

BULLYING AND HARASSMENT

October 2014

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POLICY AMENDMENTS

Amendments to the policy will be issued from time to time. A new amendment history will be issued with each change.

New Version Number	Issued by	Nature of Amendment	Approved by and date	Date on Internet
0.1	CSU Workforce	First draft		
0.2	Vale of York CCG	CCG formatting CCG Constitution		
0.3	Vale of York CCG	GDPR Update (new paragraph 10.3)	SPF 10 January 2018	23 April 2018

To request this document in a different language or in a different format, please contact:

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1. INTRODUCTION

NHS Vale of York CCG (the CCG) recognises that all employees have the right to be treated with consideration, dignity and respect. The CCG seeks to support all staff in their professional development and aims to provide a happy and fulfilling environment in which to work. This policy promotes the respectful treatment of staff within the CCG and the protection of employees from bullying and harassment at work. Bullying and harassment will not be tolerated by the CCG in any form.

2. ENGAGEMENT

In developing this policy the following groups were consulted:

- Joint Trade Union Partnership Forum/ Policy Development Group;
- Senior Management Team; and
- Vale of York CCG staff via the CCG newsletter and publishing the draft policy on the intranet for feedback/comment.

3. IMPACT ANALYSES

Equality

3.1 In applying this policy, the CCG will have due regard to the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic.

3.2 An Equality Impact Assessment is attached at Appendix 1. This policy should be carefully monitored following implementation through the local annual staff survey and the annual monitoring data and to assess whether any particular protected groups are positively or negatively affected in terms of outcomes and accessibility.

Sustainability

3.3 A Sustainability Impact Assessment has been completed for this policy and is attached at Appendix 2.

Bribery Act

3.4 The Bribery Act is relevant to this policy. Under the Bribery Act it is a criminal offence to :

- Bribe another person by offering, promising or giving a financial or other advantage to induce them to perform improperly a relevant function or activity, or as a reward for already having done so; and
- Be bribed by another person by requesting, agreeing to receive or accepting a financial or other advantage with the intention that a relevant function or activity would then be performed improperly, or as a reward for having already done so.

3.5 These offences can be committed directly or by and through a third person and other related policies and documentation (as detailed on the CCG intranet) when considering whether to offer or accept gifts and hospitality and/or other incentives.

3.6 Anyone with concerns or reasonably held suspicions about potentially fraudulent activity or practice should refer to the Local Anti-Fraud and Corruption Policy and contact the Local Counter Fraud Specialist

4. SCOPE

4.1 The policy applies to all CCG staff.

5. DEFINITIONS

What is bullying and harassment ?

5.1 Harassment, in general terms is unwanted conduct affecting the dignity of employees in the workplace. It may be related to age, sex, race, disability, religion, sexual orientation, nationality or any personal characteristic of the individual, and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient.

5.2 All employees are responsible for their own behaviour and should act at all times in a professional manner. Please note that people's behaviour in the workplace can vary on a daily basis. This policy is not intended to deal with occasional lapses of good manners unless a pattern of behaviour emerges which is perceived to be offensive or intimidatory.

5.3 Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

Behaviours

5.4 Harassment may be an isolated occurrence or repetitive, it may occur against one or more individuals. It may be but is not limited to:-

- Physical contact – ranging from touching to serious assault, gestures, intimidation and aggressive behaviour
- Verbal – unwelcome remarks, suggestions and propositions, malicious gossip, jokes and banter, offensive language
- Non-verbal – offensive literature or pictures, graffiti and computer imagery, isolation or non-cooperation and exclusions or isolation from workplace social activities
- Bullying – persistent, offensive, abusive, intimidating or insulating behaviour, abuse of power or unfair sanctions which makes the recipient feel upset, threatened, humiliated or vulnerable. Deliberately undermining a competent employee by imposing unreasonable workloads or frequent unjustified criticism.

5.5 Further examples of unacceptable behaviours that can be considered to constitute bullying and harassment are found in Appendix 4.

6. POLICY PURPOSES AND AIMS (AND FAILURE TO COMPLY)

6.1 The CCG recognises that all employees have the right to be treated with consideration, dignity and respect. The CCG seeks to support all staff in their professional development and aims to provide a happy and fulfilling environment in which to work.

6.2 This policy promotes the respectful treatment of staff within the CCG and the protection of employees from bullying and harassment at work. Bullying and harassment will not be tolerated by the CCG in any form.

6.3 Each member of staff carries personal responsibility for their own behaviour in relation to this policy and is responsible for ensuring that their conduct is in line with the standards set out in this policy.

6.4 Any employee who wishes to make a complaint of bullying or harassment should firstly discuss this with their line manager providing they feel able to do so. If not then they should discuss their complaint with a more senior manager who may be from a different function.

6.5 Allegations raised regarding bullying and harassment will be taken seriously and treated confidentially.

6.6 The CCG gives an assurance that there will be no victimisation against an employee making a complaint under this policy or against employees who assist or support a colleague in making a complaint.

6.7 Anyone who is found to have victimised a member of staff for making such a complaint, may be subject to disciplinary action.

6.8 Bullying and harassment may be treated as a disciplinary offence and, where allegations are founded, may lead to summary dismissal. Disciplinary action

may also be taken if a complaint is found to have been submitted maliciously or in bad faith.

- 6.9 If it is considered one of the parties concerned in a bullying or harassment case should be removed from the workplace, as a matter of principle the CCG will remove the alleged harasser on full pay. In no way does this imply any guilt nor does it have any detriment on the investigation.

7. PRINCIPLE LEGISLATION & COMPLIANCE WITH STANDARDS

- 7.1 The CCG has a legal obligation to ensure that harassment on the grounds of someone's race, sex, disability, sexual orientation, gender identity; (including reassignment), marriage and civil partnership, pregnancy and maternity, religion or belief, age or harassment on any other grounds does not take place at work, as this is discrimination in line with the Equalities Act 2010.

- 7.2 The CCG also has a duty of care towards its staff under the Health and Safety at Work Act 1974. Every member of staff is also personally liable under the legislation.

- 7.3 The relevant employment legislation governing this policy is as follows :

- Equality Act 2010
- Health and Safety at Work Act 1974
- Employment Rights Act 1996
- Protection from Harassment Act 1997
- Crime and Disorder Act 1998
- Employment Act 2002

8. PROCEDURE

Support and Advice

- 8.1 The CCG is committed to achieving informal resolution of complaints relating to bullying and harassment wherever possible.

In line with this approach, a series of options have been put into place to enable staff to be supported. This support will be provided to complainants, alleged perpetrators and any witnesses.

Occupational Health Service

- 8.2 Any member of staff who is involved in an allegation of bullying and harassment may find it helpful to talk to the occupational health service. All employees have a right to self-refer to occupational health.

Counselling

- 8.3 Counselling services are confidential and can be accessed through the Occupational Health Service.

Trade unions

- 8.4 The CCG recognises the important role trade unions and staff organisations play in addressing bullying and harassment and members are encouraged to seek advice from these representatives regarding their concerns. The CCG will work in conjunction with the trade unions and staff organisations in addressing unacceptable and inappropriate behaviours.

Employees may be accompanied by a work colleague not otherwise involved in the case, or a trade union or staff organisation representative at all formal stages of the procedure.

Informal Resolution

- 8.5 Every consideration should be given to achieving an informal resolution. Very often people are not aware that their behaviour is unwelcome or misunderstood and an informal discussion can lead to a greater understanding that the behaviour will cease.
- 8.6 If you feel able you should try to resolve the problem informally by making it clear to the alleged harasser that his/her actions are unwanted and should not be repeated.
If you do not feel able to raise your concerns with the person directly, you could write to them stating how you feel, state where and when the incident(s) occurred and how you wish to be treated. You are encouraged to seek advice from your trade union or staff organisation representative, or from a workforce representative when raising your concerns in writing. A note of the action taken should be kept.
- 8.7 If you feel unable to approach the alleged harasser, you could speak to your line manager (if appropriate), a workforce representative, a trade union or staff organisation representative or occupational health. A note should be made of the action taken.

- 8.8 An individual who is made aware that their behaviour is unacceptable should:-
- Listen carefully to the complaints and the particular concerns raised
 - Respect the other person's point of view
 - Agree the aspects of their behaviour that they will change
 - Review their general conduct/behaviour at work and with colleagues

Formal Resolution

- 8.9 If the alleged bullying or harassment continues and the complainant feels unable or unwilling to deal with the matter informally, or the allegation is so serious as to prevent use of the informal procedure, a complaint should then be raised formally.
- 8.10 This should initially be raised with your line manager, or if you feel unable to do so then you should discuss the complaint with a more senior manager or a workforce representative.
- 8.11 If possible, employees should keep notes of the incident(s)/harassment so that the written complaint can include :
- The date and times of the incident(s)
 - The nature of the alleged harassment or bullying
 - The names of any witnesses
 - Any action already taken to stop the alleged harassment or bullying
 - And any other relevant information
- 8.12 A decision to conduct a formal investigation should be made by the line manager/senior manager after consultation with the workforce representative.
- 8.13 Where an investigation is deemed appropriate, a suitable investigating officer and a workforce representative will be appointed. They will be expected to:
- Take full details of the incidents in writing from the complainant and their representative (if appropriate)
 - Take full details from any witnesses/other complainants who come forward and may have witnessed the alleged behaviour
 - Make the alleged harasser aware of the formal complaint, he/she should be notified by his/her own Line Manager
 - Advise the alleged harasser to seek representation and invite him/her to a meeting in order that they can comment on the allegations against them
 - Keep all parties informed of expected timescales
 - Inform all parties in writing of the outcome and any action that may be required
 - Allow the appropriate involvement of representation for the individuals involved.
- 8.14 Please refer to the Code of Good Practice for Investigations (Appendix 2 of the Disciplinary Policy and Procedure) for further information. This investigation and any action arising from it will be carried out in line with the CCG disciplinary procedure.
- 8.15 If, following investigation, it appears that bullying/harassment/misconduct has occurred; the investigating workforce representative and investigating officer will recommend the appropriate course of action in line with the CCG's

disciplinary procedure. A detailed response will be given to both parties outlining the details of the investigation and what action, if any, is being taken in respect of the complaint. This may result in a meeting being convened under the CCG disciplinary policy and the behaviour being viewed as serious misconduct.

- 8.16 If the allegations and the working situation warrant it, the alleged harasser may be suspended during the investigation or transferred temporarily pending the outcome of the inquiry to another business area.
- 8.17 The investigating officer and workforce representative will propose a time frame within which the investigation could reasonably be expected to be completed. However, given the complexities of some issues, this may not always be achievable. Timescales will be discussed in more detail with the individual concerned.
- 8.18 If the complaint is upheld at the disciplinary stage, there are a number of possible outcomes for the harasser, depending on the evidence presented and the circumstances. These could include, but are not limited to:-
- Dismissal
 - A formal warning
 - A recommendation of redeployment of the harasser either on a temporary or permanent basis. This will not be on any less favourable terms and conditions of employment
 - Making arrangements for both parties to work as separately as possible
 - Training for the harasser as deemed necessary
- 8.19 The claimant may wish to move departments/sections depending upon the nature of the complaint and the people involved. Appropriate consideration should be given to this request and the outcome with reasons provided to the complainant.
- 8.20 With any allegation, the need for a thorough and objective investigation is paramount. Consequently, if through the course of the investigation evidence supports that the allegation has been made maliciously then the individual making the complaint may be subject to disciplinary proceedings.

9. RECORD KEEPING

- 9.1 Following resolution of both formal and informal bullying and harassment complaints, a record should be kept of the incident. Where bullying or harassment did occur, it is important to check that this has stopped and that there has been no subsequent victimisation. Monitoring will be carried out on a regular basis with both parties.

10. CONFIDENTIALITY

- 10.1 All employees involved with the investigation and any subsequent process are required to respect the need for confidentiality.
All complaints, associated correspondence and interviews will be treated in strict confidence. Breaches in confidentiality will be subject to disciplinary action.
- 10.2 It must, however, be remembered that legislation requires the accused to be made aware of the allegations against them and the names of those making the allegations and the name of any witnesses.
- 10.3 The CCG is committed to ensuring that all personal information is managed in accordance with current data protection legislation, professional codes of practice and records management and confidentiality guidance. More detailed information can be found in the CCG's Data Protection and Confidentiality and related policies and procedures.

11. APPEAL

- 11.1 Appeals against decisions taken under Bullying and Harassment Policy shall be dealt with as follows :
- Appeals against a disciplinary sanction will be dealt with in accordance with the appeals process in the disciplinary procedure
 - Appeals by a complainant about the outcome of any inquiry should be notified to the workforce department with 28 days, giving their reasons for appeal

12. ROLES / RESPONSIBILITIES / DUTIES

The CCG Constitution

- 12.1 The CCG Constitution, section 9, refers to the duties and responsibilities of the CCG as an employer that may be summarised as follows :
- The CCG recognises that its most valuable asset is its people and will seek to enhance their skills and experience ;
 - The CCG will seek to set an example of best practice as an employer and will ensure that employment practices are designed to promote diversity and to treat all individuals equally;
 - The CCG will ensure that it employs suitably qualified and experienced staff who will discharge their responsibilities in accordance with the high standards expected of staff employed by the CCG;
 - All staff will be made aware of the constitution and the relevant internal management and control systems which relate to their field of work;

- The CCG will maintain and publish policies and procedures on all aspects of human resources management, including grievance and disciplinary matters;
- The CCG will ensure that its rules for recruitment and management of staff provide for the appointment and advancement on merit on the basis of equal opportunity for all applicants and staff;
- The CCG will ensure that employees' behaviour reflects the values, aims and principles set out in the Constitution;
- The CCG will ensure that it complies with all aspects of employment law;
- The CCG will ensure that its employees have access to such expert advice and training opportunities as the Governing Body consider reasonable in order to exercise their responsibilities effectively and
- The CCG will adopt a Code of Conduct for staff and will maintain and promote effective 'whistleblowing' procedures to ensure that concerned staff have means through which their concerns can be voiced.

Responsibility of Staff

12.2 All staff have personal responsibility for their own behaviour and for ensuring that they comply with the policy. There are a number of things that staff can do to help prevent harassment, such as :

- Set a positive example by treating others with respect
- Be aware of the CCG's policy and comply with it
- Do not accept behaviour that is offensive or unwanted when directed against you or others, and take positive action to ensure that it is challenged and/or reported
- Be supportive of colleagues who may be subject to bullying and/or harassment

12.3 If you are subject to bullying and/or harassment but do not feel able to talk about it yet, you should keep a record of the incidents including dates and times. You can also contact a workforce representative or Trade Union representative for advice and support.

Responsibility of Managers

12.4 All managers have a responsibility to implement this policy and to bring it to the attention of staff in their work area, in order to establish and maintain a work environment free of bullying or harassment. They must:

- a) Treat a complaint seriously and deal with it promptly and confidentially, giving the employee and the alleged perpetrator support during the process
- b) Set a positive example by treating others with respect and setting standards of acceptable behaviour; also, promote a working environment where bullying and harassment is unacceptable and not tolerated

- c) Tackle, and where possible, resolve incidents of bullying and harassment
- d) Consult with a workforce representative at any time for advice and support.

Role of the eMBED Workforce Team

12.5 The eMBED Workforce Team is responsible for advising on the application and interpretation of the policy to ensure that it is followed, fairly and consistently. They will :

- Advise managers on the application of the policy
- Advise managers and staff where individuals feel that they are being harassed or bullied in the course of their employment
- Advise on the effective implementation of the policy
- Monitor incidence of bullying and harassment and initiating appropriate action
- Review and amend the policy as necessary

13. POLICY IMPLEMENTATION

13.1 Following approval by the policy will be sent to :

- The Communications Manager who will disseminate to all staff via the team newsletter process and approve publication on the CCG intranet and website.
- The Chairs of the Governing Body, the Council of Members and all other committees and sub committees for dissemination to members and attendees.

13.2 This policy will be communicated to staff via team meetings/team brief and will be available for staff on the intranet.

13.3 Breaches of this policy may be investigated and may result in the matter being treated as a disciplinary offence under the CCG's disciplinary procedure.

14. TRAINING AND AWARENESS

14.1 A copy of the policy will be available on the CCG intranet. Training needs will be identified via the appraisal process and training needs analysis.

15. MONITORING AND AUDIT

15.1 The implementation of this policy will be audited on an annual basis by the CCG and reported to CCG Governing Body.

16. POLICY REVIEW

- 16.1 The policy and procedure will be reviewed after three years. Where review is necessary due to legislative change, this will happen immediately.

17. ASSOCIATED DOCUMENTATION

- Appendix 1 Equality Impact Assessment Form
- Appendix 2 Sustainability Impact Assessment Form
- Appendix 3 Examples of Unacceptable Behaviours which may constitute bullying and harassment
- Appendix 4 Informal Resolution
- Appendix 5 Formal Resolution
- Appendix 6 Equality Impact Assessment

18. CONTACT DETAILS

Planning and Assurance Manager

Telephone: 01904 555870

Email: valeofyork.contactus@nhs.net

Address: NHS Vale of York Clinical Commissioning Group, West Offices, Station Rise, York. YO1 6GA

19. APPENDIX 1 : EQUALITY IMPACT ASSESSMENT FORM

1.	Title of policy/ programme/ service being analysed.
	Bullying and Harassment Policy.
2.	Please state the aims and objectives of this work.
	This policy promotes the respectful treatment of staff within the CCG and the protection of employees from bullying and harassment at work. Bullying and harassment will not be tolerated by the CCG in any form.
3.	Who is likely to be affected? (e.g. staff, patients, service users)
	All CCG Staff
4.	What sources of equality information have you used to inform your piece of work?
	The CCG encourages staff to complete an annual staff survey to share views and issues relating to all aspects of their work.
5.	What steps have been taken ensure that the organisation has paid <u>due regard</u> to the need to eliminate discrimination, advance equal opportunities and foster good relations between people with protected characteristics
	This policy intends to promote equality and ensure there is a coherent approach to dealing with bullying and harassment in the workplace. The policy refers to the Equality Act 2010.
6.	Who have you involved in the development of this piece of work?
	<ul style="list-style-type: none"> • Policy and Assurance Manager • Strategy and Assurance Manager – Vale of York CCG Equality Lead • Business Support Manager • Vale of York CCG Senior Management Team • eMBED HR Department • Social Partnership Forum
7.	What evidence do you have of any potential adverse or positive impact on groups with protected characteristics? (Refer to Table 2 - What do we mean by Impact) Do you have any gaps in information? Include any supporting evidence e.g. research, data or feedback from engagement activities
	(Refer to Table 1 - Embedding Equality into the Commissioning Cycle if your piece of work relates to

	commissioning activity to gather the evidence during all stages of the commissioning cycle)	
	The evidence the CCG use to monitor this policy is the annual staff survey. As the staff numbers have increased, the CCG ensure that we continue to monitor the information from the survey particularly with regards to protected characteristics.	
Disability People who are learning disabled, physically disabled, people with mental illness, sensory loss and long term chronic conditions such as diabetes, HIV)	Consider building access, communication requirements, making reasonable adjustments for individuals etc.	
The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.		
Sex Men and Women	Consider gender preference in key worker, single sex accommodation etc.	
The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.		
Race or nationality People of different ethnic backgrounds, including Roma Gypsies and Travellers	Consider cultural traditions, food requirements, communication styles, language needs etc.	
The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.		
Age This applies to all age groups. This can include safeguarding, consent and child welfare	Consider access to services or employment based on need/merit not age, effective communication strategies etc.	

<p>The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.</p>	
<p>Trans People who have undergone gender reassignment (sex change) and those who identify as trans</p>	<p>Consider privacy of data, harassment, access to unisex toilets & bathing areas etc.</p>
<p>The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.</p>	
<p>Sexual orientation This will include lesbian, gay and bi-sexual people as well as heterosexual people.</p>	<p>Consider whether the service acknowledges same sex partners as next of kin, harassment, inclusive language etc.</p>
<p>The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.</p>	
<p>Religion or belief Includes religions, beliefs or no religion or belief</p>	<p>Consider holiday scheduling, appointment timing, dietary considerations, prayer space etc.</p>
<p>The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.</p>	
<p>Marriage and Civil Partnership Refers to legally recognised partnerships (employment policies only)</p>	<p>Consider whether civil partners are included in benefit and leave policies etc.</p>
<p>The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace.</p>	

<p>The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.</p>	
<p>Pregnancy and maternity Refers to the pregnancy period and the first year after birth</p>	<p>Consider impact on working arrangements, part-time working, infant caring responsibilities etc.</p>
<p>The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.</p>	
<p>Carers This relates to general caring responsibilities for someone of any age.</p>	<p>Consider impact on part-time working, shift-patterns, options for flexi working etc.</p>
<p>The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.</p>	
<p>Other disadvantaged groups This relates to groups experiencing health inequalities such as people living in deprived areas, new migrants, people who are homeless, ex-offenders, people with HIV.</p>	<p>Consider ease of access, location of service, historic take-up of service etc.</p>
<p>The Bullying and Harassment Policy encourages good working relationships and promotes equality in the workplace. The staff survey is used to monitor groups and highlight potential concerns. The CCG encourages close working relationships for all CCG staff and promotes active engagement within teams to enable open, honest and regular communication. This relates to protected characteristics.</p>	
<p>8.</p>	<p>Action planning for improvement Please outline what mitigating actions have been considered to eliminate any adverse impact? If no mitigating action can be taken, please give reasons. Please state if there are any opportunities to advance equality of opportunity and/ foster good relationships between different groups of people?</p>

	An Equality Action Plan template is appended to assist in meeting the requirements of the general duty
	The CCG actively works with Communications Manager to continue to use staff survey to promote staff equality and good relationship in the workplace.

Sign off
Name and signature of person / team who carried out this analysis Mary Skelton, Business Support Manager Helen Sikora, Strategy and Assurance Manager
Date analysis completed Monday 20 October 2014
Name and signature of responsible Director Rachel Potts
Date analysis was approved by responsible Director

20. APPENDIX 2 : SUSTAINABILITY IMPACT ASSESSMENT

Staff preparing a policy, Governing Body (or Sub-Committee) report, service development plan or project are required to complete a Sustainability Impact Assessment (SIA). The purpose of this SIA is to record any positive or negative impacts that this is likely to have on sustainability.

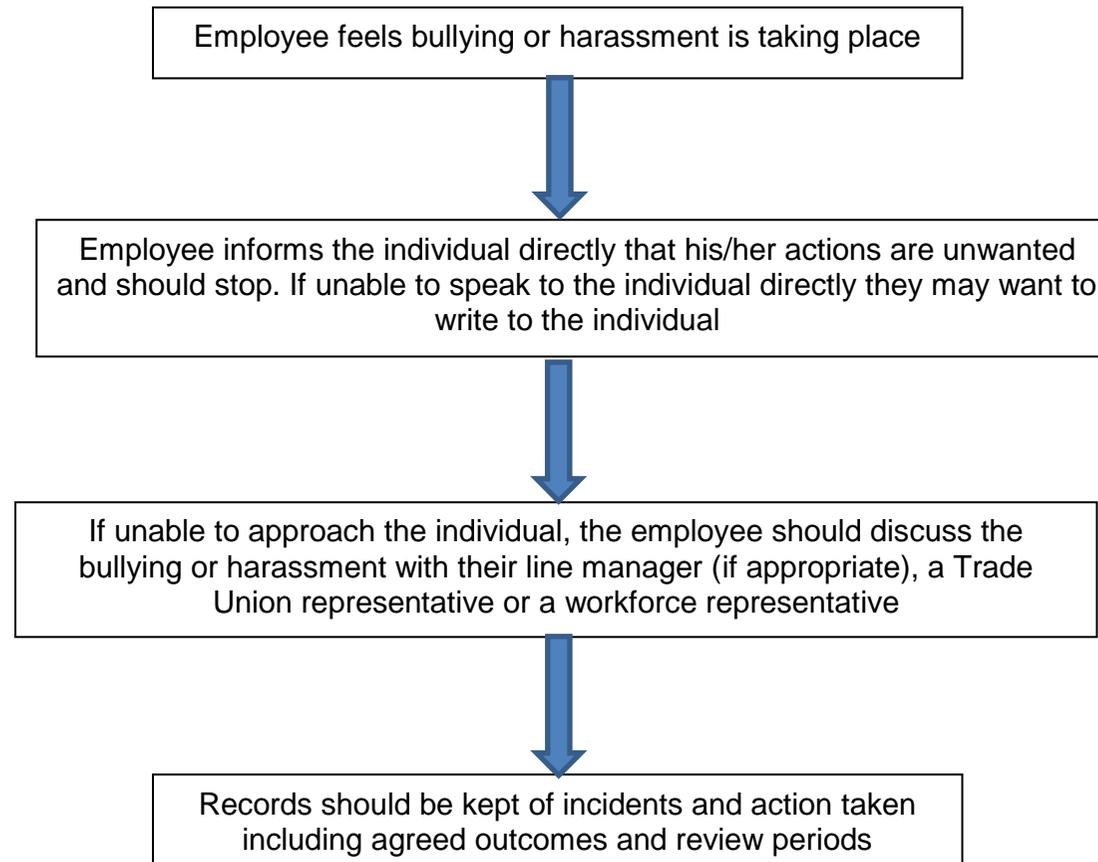
Title of the document		Bullying and Harassment Policy		
What is the main purpose of the document		This policy promotes the respectful treatment of staff within the CCG and the protection of employees from bullying and harassment at work.		
Date completed		October 2014		
Completed by		Governance		
Domain	Objectives	Impact of activity Negative = -1 Neutral = 0 Positive = 1 Unknown = ? Not applicable = N/A	Brief description of impact	If negative, how can it be mitigated? If positive, how can it be enhanced?
Travel	Will it provide / improve / promote alternatives to car based transport?	N/A		
	Will it support more efficient use of cars (car sharing, low emission vehicles, environmentally friendly fuels and technologies)?	N/A		
	Will it reduce 'care miles' (telecare, care closer) to home?	N/A		
	Will it promote active travel (cycling, walking)?	N/A		
	Will it improve access to opportunities and facilities for all groups?	N/A		

	Will it specify social, economic and environmental outcomes to be accounted for in procurement and delivery?	N/A		
Procurement	Will it stimulate innovation among providers of services related to the delivery of the organisations' social, economic and environmental objectives?	0		
	Will it promote ethical purchasing of goods or services?	0		
Procurement	Will it promote greater efficiency of resource use?	0		
	Will it obtain maximum value from pharmaceuticals and technologies (medicines management, prescribing, and supply chain)?	0		
	Will it support local or regional supply chains?	0		
	Will it promote access to local services (care closer to home)?	0		
	Will it make current activities more efficient or alter service delivery models			
Facilities Management	Will it reduce the amount of waste produced or increase the amount of waste recycled? Will it reduce water consumption?	N/A		
Workforce	Will it provide employment opportunities for local people?	0		
	Will it promote or support equal employment opportunities?	0		
	Will it promote healthy working lives (including health and safety at work, work-life/home-life balance and family friendly policies)?	0		
	Will it offer employment opportunities to disadvantaged groups?	0		

Community Engagement	Will it promote health and sustainable development?	0		
	Have you sought the views of our communities in relation to the impact on sustainable development for this activity?	0		
Buildings	Will it improve the resource efficiency of new or refurbished buildings (water, energy, density, use of existing buildings, designing for a longer lifespan)?	0		
	Will it increase safety and security in new buildings and developments?	0		
	Will it reduce greenhouse gas emissions from transport (choice of mode of transport, reducing need to travel)?	0		
	Will it provide sympathetic and appropriate landscaping around new development?	0		
	Will it improve access to the built environment?	0		
Adaptation to Climate Change	Will it support the plan for the likely effects of climate change (e.g. identifying vulnerable groups; contingency planning for flood, heat wave and other weather extremes)?	N/A		
Models of Care	Will it minimise 'care miles' making better use of new technologies such as telecare and telehealth, delivering care in settings closer to people's homes?	N/A		
	Will it promote prevention and self-management?	N/A		
	Will it provide evidence-based, personalised care that achieves the best possible outcomes with the resources available?	N/A		

	Will it deliver integrated care, that co-ordinate different elements of care more effectively and remove duplication and redundancy from care pathways?	N/A		
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21. APPENDIX 3 : EXAMPLES OF UNACCEPTABLE BEHAVIOURS WHICH MAY CONSTITUTE BULLYING AND HARASSMENT



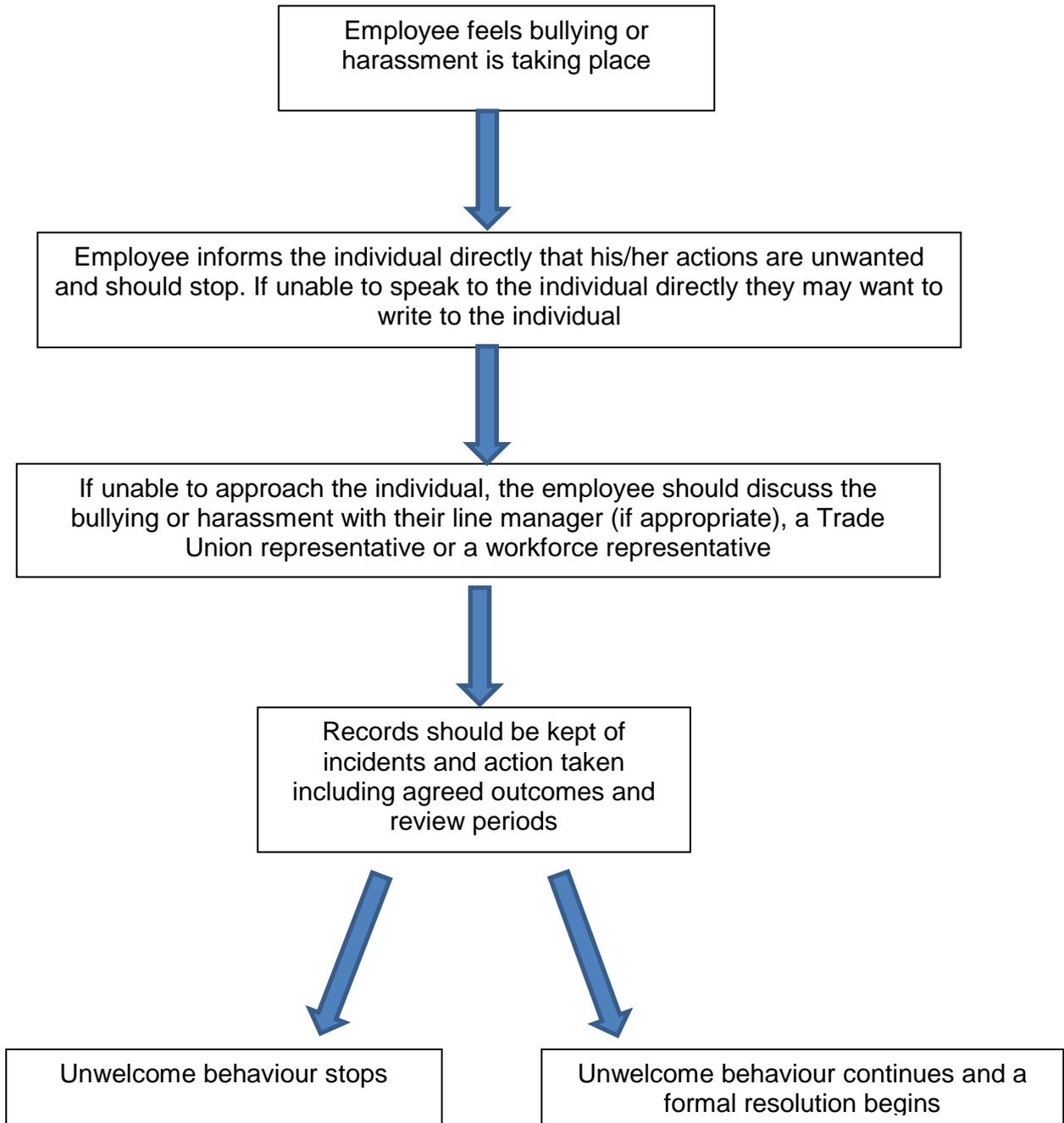
22. APPENDIX 4 : EXAMPLES OF UNACCEPTABLE BEHAVIOUR

Examples of unacceptable behaviour that can be considered to constitute bullying and harassment :

- Bullying by exclusion - this may take the form of social isolation and/or exclusion from meetings
- The deliberate withholding of information with the intention of affecting a colleague's performance
- Unfair and destructive criticism
- Intimidating behaviour
- Verbal abuse and spreading of unfounded rumours
- Humiliation or ridicule
- Setting of unrealistic targets which are unreasonable and/or changed with limited notice or consultation
- Copying information that is critical about someone to others who do not need to know

Please note this list is not exhaustive.

23. APPENDIX 5 : INFORMAL RESOLUTION



24. APPENDIX 6 : FORMAL RESOLUTION

