



**Prevention of Workplace Bullying and Violence  
Policy and Procedure  
BRAC International**

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## **1. Introduction**

Workplace bullying and violence is a serious threat to the physical safety and mental well-being of employees. Failure to prevent such incidents in the workplace hampers an employee's ability to work safely and productively.

BRAC, as an organisation, has for over forty years made the safety of the participants of its programs, the safety of the employees of its programs and the safety of the employees of its enterprises of paramount importance in the way it has conducted its (anti-poverty) work.

BRAC has safeguarded its people (program participants, employees) in the first place by making their safety a primary consideration already at the level of the design of programs and enterprises. The prevention of sexual harassment, intimidation, violence, bullying, humiliation and discrimination, neglect and exploitation is as far as possible built into the work practices themselves. If the design and its implementation cannot reduce risks sufficiently, Brac has installed secondary safeguarding mechanisms, like selecting and training of personnel, supervising and monitoring activities, reporting channels, investigations and punishments.

In the overall safeguarding policy BRAC has described its history in more than forty years of safeguarding practice. BRAC pledges to continue its vigilance. The safeguarding policy also described BRAC's ethos and prevention practice in general.

BRAC is committed to uphold the right to a safe workplace for its employees, programme participants and partners where no one is subjected to any form of harassment, bullying, threats or actual violence.

## **2. Scope of Policy**

This policy should be read and interpreted in line with the overarching Safeguarding Policy. The objective of this policy is to address intimidating, threatening, bullying, humiliating, discriminatory, neglect, exploitation, inappropriate or unwelcome behavior in the workplace. Workplace harassment can be a significant one-time occurrence, repetitive, intimidating, threatening, violent direct or indirect behavior by someone in a position of authority, a group of persons at work, employees against a manager or by employees of the same level.

The inappropriate behavior can be verbal, physical or through electronic communication. The use of electronic communication, including social media in the course of employment, to intimidate or threaten a person also falls under this policy if the behavior arises from employees of BRAC.

If an incident of harassment occurs there may be an intersection of issues which are intentionally duplicated and addressed in other BRAC policies such as; the Code of Conduct, Adult with Special Needs, Whistleblowing and Sexual Harassment Elimination Policy. If a harassment complaint includes elements that are sexual in nature the Sexual Harassment Elimination Policy should be the primary policy and procedure that is followed.

This policy applies to all employees including regular, contractual, project, service, trainee (including apprentices & interns), volunteers, outsourced and non-graded staff and programme

participants of BRAC. It also includes to Partner employees, consultants, service providers and programme participants.

### **3. Definitions**

#### **Workplace Harassment**

Direct or indirect behavior which can be a significant one-time occurrence, repetitive, pestering, unwelcome, threatening, targeted, belittling and physically and/or emotionally harmful to the person subjected to it

#### **Bullying**

Behavior which seeks to belittle, dominate, target or single out someone. The behavior can be indirect, aggressive and/or threatening. The use of electronic communication/social media which is referred to as “Cyber bullying” is also covered under this policy.

#### **Violence**

The threat of physical assault or direct aggressive unwelcome physical contact in the workplace.

The following includes a non-exhaustive list of types of behaviors that may constitute a breach of this policy:

- Threat of physical violence
- Physical assault
- Repetitive targeted behavior that belittles or humiliates someone
- Derogatory comments or behavior

### **4. Role of Supervisor**

A supervisor merely carrying out operational direction, performance management, disciplinary measures or any other acts that are within their employment responsibilities will not simply amount to harassment. To constitute as bullying elements of belittling, singling out, threat or intimidation as described in section 3 should be proven with evidence. Supervisors must follow organisation's policy, procedures and Code of Conduct (COC). Any unfairness and violation of policy and procedures if investigated and are proven appropriate action will be taken as per organisation's policy against the supervisor.

This policy extends to behavior which occurs outside the BRAC's premises, such as at social functions or training events, provided there is a sufficient link with the work of the firm and its employees.

No disciplinary action (except the immediate ones if situation demands) can be taken before proper investigation. Complaints raised will follow the disciplinary procedure according to the BRAC Human Resources Policies and Procedures (HRPP).

### **5. Reporting**

Anyone who is subject to workplace bullying should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. BRAC recognizes that harassment may occur in

unequal relationships and that it may not be possible for the victim to inform the alleged harasser. If felt that he/she or someone else has been the recipient of harassment, a complaint should preferably be lodged as soon as such incident takes place.

A Report can be made by a victim, peers, supervisors or witnesses using the methods below:

Complaints are received through letters, phone calls, emails, and in person. The report can be lodged immediately through any of the following ways:

Complaints can be lodged to [bi.safeguarding@brac.net](mailto:bi.safeguarding@brac.net), [voice.international@brac.net](mailto:voice.international@brac.net) or [voice.countryname@brac.net](mailto:voice.countryname@brac.net) (i.e for Uganda- [voice.uganda@brac.net](mailto:voice.uganda@brac.net), for Afghanistan – [voice.afghansitan@brac.net](mailto:voice.afghansitan@brac.net))

Report can also be lodged directly to Country Representative, Chief Executive Officer, Directors, Executive Directors, and CPO / Director Human Resources.

If the victim complains via their line management the manager will send the complaint to the Human Resource Compliance Committee who is responsible for reviewing the complaint and deciding whether it warrants investigation. If so, they will refer to the Investigations Unit for investigation.

## **6. Response**

Any complaints related to this policy will be addressed through the grievance procedure. The process is mentioned below:

### **Human Resource Compliance Committee (HRCC):**

BRAC operating in different countries has created a dedicated committee, known as the Human Resource Compliance Committee (HRCC) that receives all kinds of complaints and initiates investigations for cases of abuse and harassments, reviews the investigation reports and takes decision based on the findings of investigation. The HRCC consists of senior level members from programmes and functional departments, including the Country Representative and Head of HRD. The steps taken are as follows:

- The Committee will receive all complaints related to “workplace bullying” and “violence”.
- Decides on whether the complaint will go for investigation or not.
- If the HRCC does not find a prima facie case it will not go for investigation.
- Forward the complaint to investigation team if so decided.
- Ensure that the entire process is done within time, that is, within 60 days of receiving the complaint.
- The Committee consists of 5 to 7 members, including the Country Representative and/or Chief Executive Director.
- The Committee will ensure security of the complainant and inform them about decision of the organisation.

## **7. Prevention**

One of main priorities of BRAC is to prevent harassment and uphold a safe working environment. The preventive measures will be:

- Orientation about current Workplace Harassment and Violence policy during every employee's onboarding
- Focused training on the victim/survivor centric approach for all staff.
- Refresher training for all employees after certain intervals
- Circulate/display a short version of policy procedures at all locations within BRAC establishment
- Circulate leaflet/Poster/Booklet and include the messages in the staff dairy and beneficiary's passbook.

## **8. Review of Policy and Procedure**

The policy will be reviewed at a minimum of every 3 years or when it is shown necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to legislation.