

# Procedure in cases of bullying, harassment or violence in the workplace

## Initiation of procedure

**Report/information received by the party responsible for the procedure:** Human resources manager at SÍ or Employee trustee

**Person(s) responsible should ask for the following information from the person reporting the behaviour:**

- description of the behaviour
- the name of the alleged offender
- when the behaviour occurred, as well as where and who was present

**The person responsible ensures that all information/announcements are evaluated by an outside specialist/professional.**

**Documentation:** The person responsible assesses the information and documents it.

## Informal procedure

If a victim reports an incident and asks for confidentiality and/or does not want to initiate the procedure, the outside specialist/professional, must assess whether the request can be granted.

If granted, a formal investigation phase of the procedure is not initiated. Instead, the response is limited to supporting to the victim.

The identity of the offender is not documented and no one except the person responsible for the procedure receives that information. The victim receives appropriate support, and where possible, general preventive actions regarding communication and cooperation in the workplace are initiated after consultation with the victim.

## Investigation

The person responsible instigates an investigation of the alleged behaviour with the purpose of assessing whether there are reasonable grounds for suspicion of bullying, harassment or violence in the workplace. The party who carries out this investigation on behalf of the company seeks relevant documentation and plans interviews.

## Interviews

The person responsible seeks the assistance of an expert/ombudsman in the workplace to perform the assessment and carry out interviews (investigator). Alternatively, the responsible party for the procedure can carry out interviews and document them, and subsequently seek assistance regarding the assessment.

**Interviews with alleged victim and witnesses:** Interviews with alleged victim and witnesses: Interviews are carried out with the alleged victim and witnesses. The interviews and all the content relating to them are kept confidential and the parties interviewed are not allowed to disclose anything about these interviews to the alleged victim, the alleged offender or any other party until the person responsible gives them permission to do so.

**Interview with the alleged offender:** Interview with the alleged offender: The alleged offender receives information on the complaint made and a summary of the information gathered in the interviews without any assessment. The alleged offender is then asked to give his/her own account of the behaviour and

interaction including place, time and who was present. They also provide any other information considered to be relevant to the proceedings.

The next step is to assess whether further interviews are necessary, based on the information received from the alleged offender and whether any new information calls for a second interview with the victim and witnesses. In this case, a final interview may then be carried out with the alleged offender.

The alleged victim and witnesses should be offered the support of a specialist if the procedure causes them distress. If appropriate, this may also be offered to the alleged offender as well.

## Assessment

After the investigation, an assessment is carried out. The findings are reported in written form to both the alleged victim and the alleged offender. The conclusion should contain a proposed action plan. The alleged victim and the alleged offender can agree to the proposed action plan where appropriate, or the action plan may be asked to them as a final decision.

### Conclusion: Not bullying, harassment or violence

- The action plan contains actions to improve communication and cooperation
- A clear message is given on communication
- Supervision and follow up is to be carried out according to the action plan
- The alleged offender and alleged victim are informed that the case is closed but that a follow-up procedure is in place

### Conclusion: Bullying, harassment or violence

- The action plan contains a decision on the consequences for the offender;
  - Reprimand or termination of the employment contract if applicable
  - A conciliation process is carried out if applicable, supported by a clear message on communication, supervision and follow-up:
- A clear message is given on communication and cooperation
- Supervision and follow-up are planned
- The offender and victim are informed that the case is closed but that a follow-up procedure is in place.

## Follow up

- Support is provided to the parties involved/victim. Their mental state is monitored as well as their general progress.
- A timed assessment is carried out on the success of the action plan.
- As part of that assessment, actions and need for further actions are reassessed, e.g. changes being implemented in the workplace, response, work procedures etc.

# Response plan for bullying, harassment and violence

**A complaint is reported or information is received**

## **Investigation**

Alleged victim and offender are interviewed as well as witnesses where applicable.

## **Assessment**

Findings are presented to the victim and offender according to the action plan.

### **Not bullying, harassment or violence**

Action plan contains steps for improving communication.

### **Bullying, harassment or violence**

Action plan contains decision on consequences for the offender.

## **Follow-up**

Support is provided to parties involved/victim and their mental state and progress is monitored.

**Success of the action plan is assessed**