

# Bullying and Harassment Policy and Procedure



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## Purpose

To create a workplace free from bullying and harassment, and to ensure that staff feel confident that their concerns will be addressed promptly and fairly by management.

## Scope

This policy applies to all clinic personnel, including staff physicians, locum physicians, allied health professionals, administrative staff, Primary Care Network (PCN) clinicians, medical students, and residents, and applies to interpersonal and electronic communications.

## Policy

- Everyone has a right to work free from bullying and harassment. At our clinic, we do not accept any behaviour in which people are bullied or harassed.
- Everyone must adhere to this policy and procedure.
- Everyone must report if bullying and harassment are observed or experienced.
- When we see or hear about any incident of bullying or harassment, we respond immediately to stop it.
- All staff will be informed of this policy and procedure and will receive bullying and harassment training during their Young or New Worker Orientation.

## Definitions

**“Bullying”** is any inappropriate conduct or comment that the person knew, or reasonably ought to have known, would cause humiliation or intimidation. **“Harassment”** is any repeated, unwanted physical, verbal, or written behaviour that offends or humiliates.

**Bullying and harassment** can be a single incident or repeated incidents over time. It can occur during or after working hours, on and off workplace property, come from different sources such as internal (co-workers, supervisor, employer) and external (patients, visitors, other workers), and occur in many forms such as online, social, verbal, and physical.

Common bullying and harassment behaviours include:

- Verbal aggression, insults, or threats.
- Humiliating initiation practices or hazing.
- Spreading malicious rumors.
- Calling someone derogatory names.
- Vandalizing personal belongings.
- Isolation and/or exclusion from work-related activities.
- Inappropriate flirting, unwelcome sexual comments, jokes, or advances.

The above list is not exhaustive. Bullying and harassment can also take place on the grounds of a person’s age, religion, political affiliation, sex, or any other characteristics protected under the [B.C. Human Rights Code](#).

Bullying and harassing behaviour **does not include**:

- Expressing differences in opinion.
- Offering constructive feedback, guidance, or advice about work-related behaviour.
- Reasonable action taken by an employer or supervisor relating to the management and direction of employees (e.g., managing a worker's performance, taking reasonable disciplinary actions, or assigning work).

## Responsibilities

### Employer:

- Support, understand, adopt, and implement this policy and procedure.
- Provide training and resources to the designated individual responsible for internal investigations.
- Ensure all incidents are investigated fully and formalized with a written report.
- Incorporate, where appropriate, any need or request from the complainant or respondent for assistance during the investigation process.
- Complete investigations free of judgment and bias and maintain confidentiality.
- Provide follow-up and recommendations to assist in eliminating recurrence.
- Conduct an annual review of this policy.

### Supervisor:

- Inform and train workers on this policy and procedure.
- Take steps to prevent bullying and harassment.
- Promote the process to report incidents and complaints of bullying and harassment.
- Participate in the investigation of any incidents of bullying and harassment where necessary or required and maintain confidentiality.
- Participate in the annual review of this policy and SWP.

### Staff:

- Report bullying and harassment observed or experienced in the workplace.
- Cooperate with investigations and provide any details of the incident they experienced or witnessed.
- Maintain confidentiality.
- Participate in the annual review of this policy and SWP.

## Procedures

### Complainant process for reporting

- All incidents of bullying and harassment should be reported as soon as possible, verbally or in writing, to a supervisor.
- The *Bullying and Harassment Complaint Form* will be used to record the identities of the complainant and respondent, as well as details of the complaint, including dates, names, location, witnesses, and any other relevant information to the complaint.

- Where the supervisor is the alleged bully, it is recommended that the individual directly report to WorkSafeBC at 1-888-967-5377.

## **Employer process for investigating**

### **1. Investigator selection**

Most investigations will be conducted internally. In complex or sensitive situations, an external investigator may be hired.

### **2. Incident review**

Investigations will include interviews with the alleged target, the alleged bully, and any witnesses. The investigation will be documented using the *Bullying and Harassment Investigation Form*. If the alleged target and bully agree on what happened, the investigation will stop, and management will determine what corrective action to take.

### **3. Follow up**

All investigations of alleged bullying and harassment will be responded to and documented. Follow-up will include a description of corrective actions, a timeframe, and a method to address adverse symptoms. The complainant will be advised of the outcomes and support available.

*A complainant is not obligated to continue with a formal complaint at any point throughout the process. However, the Employer reserves the right to pursue an investigation and resolution process, with or without the complainant's consent, when they have sufficient concerns about the alleged behaviour.*

The process for investigating incidents and complaints of bullying and harassment will:

- Be prompt and diligent, and be as thorough as necessary, given the circumstances.
- Be fair and impartial, providing the complainant and respondent equal treatment in evaluating the allegations.
- Be sensitive to the interests of all parties involved and maintain confidentiality.
- Focus on finding facts and evidence.

## **Training**

Training for supervisors and workers will include the following:

- How to recognize signs of bullying and harassment.
- How staff who experience or witness bullying and harassment should respond.
- How to report and document bullying and harassment.
- How the employer responds to incidents or complaints of bullying and harassment.

## **Confidentiality**

Allegations of bullying and harassment involve sensitive disclosures. Confidentiality must be maintained at all times. All information is confidential with disclosure only to those who are direct

parties to the investigation, or where disclosure is required by law. Confidentiality cannot be guaranteed for individuals who initiate proceedings or comment outside the internal procedures.

## Annual Review

This policy and procedure will be reviewed annually and updated as needed.

## Reference

- [WorkSafeBC – Bullying & Harassment](#)
- [WorkSafeBC – Guidelines for the WCA - G-P2-21\(1\)-3 Bullying and Harassment](#)

## Approval

Employer:

Date: