

# Anti-Bullying and Harassment Policy

Updated July 2019

## Contents

<b>Introduction.....</b>	<b>3</b>
<b>Policy Statement.....</b>	<b>3</b>
<b>Scope.....</b>	<b>3</b>
<b>What is Bullying? .....</b>	<b>3</b>
<b>What is harassment?.....</b>	<b>4</b>
<b>Standards .....</b>	<b>4</b>
<b>Responsibilities of everyone involved.....</b>	<b>5</b>
<b>Guidelines.....</b>	<b>6</b>

## Introduction

---

Everyone working in AIB has the right to be treated with dignity and respect. The bank believes in providing a workplace that supports our people to be at their best and make a positive contribution to what we do.

## Policy Statement

---

AIB is committed to ensuring that our organisation is free from all forms of bullying, harassment, or associated behaviour. All employees should be protected from bullying or harassment from colleagues or customers, they should never feel intimidated, degraded, or humiliated, or suffer hostility within the workplace.

If you experience bullying or harassment behaviours It is important that you act as soon as possible by either talking to the alleged wrongdoer or to any people leader who may be able to help. If the behaviour is continues then you should escalate your complaint\* as soon as possible.

Whether the behaviour is bullying or harassment, the intention of the wrongdoer is irrelevant and the fact that the wrongdoer had no intention of bullying/harassing a fellow employee is no defence. It is the effect of the behaviour on the person that is important.

If you make a complaint, you have the banks assurance that the complaint will be treated with fairness and sensitivity and in as confidential a manner as possible.

## Scope

---

All those working either in or for AIB and forms part of our Code of Conduct framework.

This policy relates to any unwelcome behaviour, regardless of where it happens, be it in the workplace or at any work-related event such as meetings, conferences, training or work-related social events organised by the bank, whether held at your place of work or off-site.

## What is Bullying?

---

It is repeated inappropriate behaviour either direct or indirect, whether verbal, physical or other. It can be conducted by one or more persons against another or others. It can occur at the place of work and/or in the course of employment. An isolated incident is not considered bullying, unless it takes place through a social media channel.

Legitimate, constructive and fair criticism of your performance or behaviour at work by management is not bullying as long as you are treated with dignity and respect.

Bullying manifests itself as various types of behaviour. Some examples of these behaviours include:

- Humiliation;
- Intimidation;
- Verbal or physical abuse, including threats;
- Victimisation;
- Exclusion and isolation;

- Intrusion through pestering, spying or stalking;
- Setting unreasonable assignments or duties which are obviously unfavourable to individual(s);
- Setting impossible deadlines or impossible tasks.

## What is harassment?

---

Harassment and sexual harassment includes any form of unwelcome behaviour that occurs in the course your employment that causes you distress, disruption, offence. Harassment is any form of behaviour which is unwelcome such as;

- Unwanted physical conduct
- Unwanted verbal conduct
- Unwanted non verbal conduct
- Sexual harassment
- Victimisation

(a single such incident can be construed as harassment)

This policy covers harassment based on any of the following characteristics.

- There are nine characteristics: gender, age, civil status, family status, sexual orientation, disability, race, religion or beliefs, membership of the traveller community, gender reassignment / sex and membership of a trade union. It applies even if the person does not actually possess any of these characteristics. (This list includes the grounds of discrimination and characteristics as defined in both the Irish and UK Equality Acts)

## Click here for more information

### Standards

---

- We are all responsible for making sure that we have a work environment free from bullying and harassment. It is important not to ignore any such issues that concern you and to speak to a member of management immediately.
- Complaints of bullying/harassment can be raised informally in the first instance, either through speaking to the alleged wrongdoer or to any people leader.
- Should the informal procedure not resolve the issue then formal procedures can be invoked. **(see supporting information for procedural information)**
- In as far as possible all allegations, discussions and investigations will be treated in the strictest of confidence and on a need to know basis only.
- The Bank will investigate reports thoroughly, objectively and with sensitivity and take appropriate action on a timely basis.
- Anyone involved in an investigation, e.g. complainant, alleged wrongdoer, or witness, is expected to co-operate with the investigation.
- All parties involved in an investigation must maintain absolute confidentiality.
- In the interests of natural justice, the alleged wrongdoer will be made aware of any complaints made against them.

- Anyone involved in an investigation has the right to be accompanied or represented at any meeting / discussion, by an employee representative (i.e. a work colleague or a recognised Trade Union representative)\*.
- Mediation can be employed at any stage of the informal or formal process and may be encouraged by the bank if it will support you in reaching a resolution.

*What is mediation? It is a facilitated process where issues are communicated and negotiated. The goal is to reach a mutually acceptable solution. If mediation is used then the Bullying/Harassment procedures are suspended for the duration of the mediation process (if mediation doesn't work then the aggrieved party can re-start the bullying/harassment procedures.)*

- Proven complaints of bullying or harassment may be grounds for disciplinary action up to and including dismissal.
- Any individual found to have made a knowingly false allegation of bullying/harassment, or any individual who knowingly supports a false claim, including witnesses, may be subject to disciplinary action.
- Bullying by others such as non-employees, clients, customers and business contacts will not be tolerated and may lead to sanctions such as termination of contracts, suspension of services, or exclusion from bank premises.
- Bullying Complaints should be raised as quickly as possible and must be raised within 6 months of incidents taking place. In exceptional circumstances a 12 month time limit may apply, subject to the discretion of the Head of HR.
- Harassment Complaints should be raised as quickly as possible and must be raised within a period of three months after the harassment incident(s), to facilitate a timely investigation.
- The statutory rights of all involved in this process will remain unaffected.

\*Note- A bullying and harassment complaint differs from a grievance complaint in that grievances are about rights/entitlements whereas bullying/harassment complaints are about "repeated unwelcome behaviour".

\* If your representative is unable to attend a hearing, a postponement of up to five days will be allowed so your representative can be present. Where this is not possible you must be represented at the re-arranged hearing by an alternative work colleague or Union representative.

## Responsibilities of everyone involved

---

- **People Leaders** - All of us in positions of authority have a particular responsibility to ensure that bullying and/or harassment does not happen and that complaints are addressed speedily. **(see supporting information for more information)**
- **Employees** - As employees we should all contribute to achieving an environment free of bullying or harassment and we should report any incidents on a timely basis.
- **Complainant** - If you are bullied or harassed, it is important that you note the details of the incidents, including noting any witnesses who may have been present, and that you report any incidents quickly.
- **Alleged Wrongdoer** - If someone speaks to you and indicates that they feel that your behaviour is inappropriate, you should listen to what is being said. Consider it

calmly and if applicable change your behaviour. (**see supporting information for more information**)

- **Witness** - If you are identified as a witness to a complaint you may be asked to provide a statement. No information will be kept on file regarding your participation in the case.

## Guidelines

---

- If you can, you should speak to the person responsible in the first instance.
- If you are not comfortable speaking directly to the alleged wrongdoer then you can talk to either your People Leader (or any other people leader) or the Workforce Performance Team in HR Direct for advice.
- The People Leader investigating the case may contact the Workforce Performance Team in HR Direct for advice and support at any time.
- The process for raising a complaint both informally and formally are **detailed in the supporting information**.
- Anyone involved in an investigation can seek advice on a confidential basis from their People Leader, the Workforce Performance Team in HR Direct or from their Trade Union Representative.
- Both the complainant and alleged wrongdoer have the right to appeal any course of action determined by AIB resulting from the investigation and subsequent finding.
- Our EAP phone line can give you free, independent emotional support at any time, on a confidential basis, Please contact:
  - In ROI the number is FREEPHONE 1800 200 314
  - In UK the number is 0800 243 458
  - Outside the UK the number is +44 (0) 20 8987 6550
  - Email: [assistance@workplaceoptions.com](mailto:assistance@workplaceoptions.com)
  - Website: [www.workplaceoptions.com](http://www.workplaceoptions.com)

---

**Useful Information;** Workforce Performance Team contact information Ext 26640

<i>Policy Implementation date:</i>	<i>12.03.2015</i>
<i>Last updated with changes:</i>	<i>01.07.2019</i>
<i>Policy is reviewed:</i>	<i>If changes required by legislation or the business</i>
<i>Policy Owned by:</i>	<i>Head of Governance &amp; Regulation, HR</i>

This policy replaces any previous policies addressing bullying and harassment and complies with all codes, legislation and regulations in all the jurisdictions in which we operate.