

Harassment Policy and Procedure

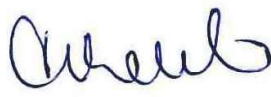
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HISTORY AND ISSUE CONTROL

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Author	Responsibility	Authorisation
		
Hubert Mugliett	Hubert Mugliett	Maria Melillo

Head of SHRM	Head of SHRM	CEO
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AUTHORISATION

1. PURPOSE

It is the policy of the Company to prohibit any form of personal harassment. Improper interference with the ability of staff members to perform their expected duties will not be tolerated and should be reported to the appropriate supervisor as well as to the Medilink International General Manager.

2. SCOPE

The Harassment procedure will apply to all staff members and contractors from the commencement of their relationship with the Company. There may be local variances to this policy and procedure that comply with local legislation.

3. DEFINITIONS

HARASSMENT

Personal harassment takes many forms and staff members may not always realise that their behaviour constitutes harassment. Harassment is related to protected characteristics, age, sex, disability, race, gender, religion, and sexual orientation. Personal harassment is unwanted behaviour by one staff member towards another and examples of harassment include:

- insensitive jokes and pranks,
- lewd or abusive comments about appearance,
- deliberate exclusion from conversations,
- displaying abusive or offensive writing or material,
- unwelcome touching,
- abusive, threatening, or insulting words or behaviour.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against staff members committing any form of personal harassment.

Unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature constitute unlawful sexual harassment when either:

- submission to such conduct is or becomes a term or condition of an individual's employment or is used as a basis for employment decisions relating in any way to that individual,
- such conduct substantially interferes with an individual's work performance,

- such conduct creates an intimidating, hostile, or offensive working environment.

4. REFERENCES AND RELATED PROCEDURES

- SOP_HRRMST10 – SOP for Disciplinary Action
- HRRMST1019 - Performance Evaluation Feedback Form
- POL_HRRMST01 - Equal Opportunities Policy
- POL_HRRMST03 - Grievance Policy and Procedure

5. ROLES AND RESPONSIBILITIES

GENERAL MANAGER/ COUNTRY MANAGER/ CEO	The person, who will receive a formal complaint of harassment and authorise an investigation. They have the authority to dismiss/terminate the contract of service of a member or contractor. They are the highest authority responsible for the country/region where the complaint is lodged.
HR Department	The Department is in charge of maintaining HR records and ensuring that this policy and procedure is followed.
MANAGER	Person appointed by the General Manager/Country Manager/CEO to complete an investigation into the complaint.
STAFF MEMBER	May make a true complaint unmaliciously and has a responsibility to follow the process outlined in this policy and procedure.
CONFIDENTIAL HELPER	A senior colleague of the Staff Member's choice who will support the Staff Member through the process. Whilst the Confidential Helper may support the Staff Member, they may not act on the Staff Member's behalf.

6. PROCEDURES

6.1. INFORMAL COMPLAINT

Medilink recognises that personal harassment complaints, particularly sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for a Staff Member to raise the issue through the Company's normal grievance procedure. In these circumstances, the Staff Member is encouraged to raise such issues with a senior colleague of their choice (whether that person has direct supervisory responsibility for the

Staff Member or otherwise) as a confidential helper. This person cannot be the General Manager/Country Manager/CEO or their delegate, who will be responsible for investigating the matter if it becomes a formal complaint and must be indicated to the General Manager/Country Manager/CEO investigating the complaint as soon as appropriate.

If a Staff Member is the victim of minor harassment, the Staff Member should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If the Staff member feels unable to do this verbally then they should hand a written request to the harasser, and their confidential helper can assist in this.

A record of such written requests should be kept and handed over to the HR Department in case of escalation.

6.2. FORMAL COMPLAINT

Where the informal approach fails or if the Staff Member feels that the harassment is serious, they should bring the matter to the attention of the General Manager/Country Manager/CEO as a formal written complaint. Staff Member's confidential helpers can assist them in this. If possible, the Staff Member should keep notes of the harassment so that the written complaint can include:

- the name of the alleged harasser,
- the nature of the alleged harassment,
- the dates and times when the alleged harassment occurred.

Once a formal complaint is received the General Manager/Country Manager/CEO shall instigate an investigation of the Harassment complaint following the **POL_HRRMST03 - Grievance Policy and Procedure** and **SOP_HRRMST10 - SOP for Disciplinary Action** as required.

7. REFERENCE STANDARDS AND GUIDELINES

- Employment Equality Framework Directive (2000/78)
- Racial Equality Directive (2000/43)

8. APPENDICES

ANNEX A - Procedure flowchart

