



SONIC HEALTHCARE
UK

Staff Policy

Bullying & Harassment Policy

Version 1



1	INTRODUCTION	3
2	DEFINITIONS OF BULLYING AND HARASSMENT	3
3	REPORTING & COMPLAINTS PROCEDURE	4
4	POLICY DEVELOPMENT.....	7
5	POLICY PRINCIPLES	7
6	MONITORING & EVALUATION.....	8
7	TRAINING, AND RISK MANAGEMENT	8
8	RELATED DOCUMENTS & POLICIES	8
9	DOCUMENT APPROVAL.....	9
10	CHANGE DETAILS	9
	ANNEX 1 – GUIDE FOR MANAGERS.....	10

1 Introduction

- 1.1 Sonic Healthcare UK is committed to providing a safe and respectful working environment for all employees, free from any harassment. Bullying and Harassment is unacceptable and will not be tolerated under any circumstances. All employees have the right to work in an environment where they are treated with dignity and respect.
- 1.2 Sonic Healthcare UK operates a zero-tolerance stance toward any form of harassment in the workplace and is committed to treating all incidents seriously and promptly investigate all allegations of any harassment. Any person found to have bullied and/or harassed another will face disciplinary action, up to and including dismissal from employment.
- 1.3 All complaints of bullying and harassment will be taken seriously and handled with respect and in confidence. No one will be victimised for making such a complaint.
- 1.4 The ACAS guidelines are designed to provide clarity and certainty in standards for both employers and employees when handling specific issues at work. While not mandatory, employees and employers are expected to follow the guidelines.

2 Definitions of Bullying and Harassment

- 2.1 Bullying and Harassment is unwelcome conduct that violates an individual's dignity or create hostile, intimidating, degrading, or offensive environment. It may be verbal or physical, or non-verbal and can occur as a single incident or series of behaviours.
- 2.2 Examples of **bullying** include, but are not limited to;
 - Unwanted, offensive, or malicious behaviour that undermines, humiliates, or intimidates.
 - Persistent actions that creates a hostile or degrading environment.
 - Abuse of power where an individual or group targets someone in a way that affects their dignity or well-being.
 - Spreading rumours, exclusion, threats, or excessive criticisms.
- 2.3 Examples of **harassment** include, but are not limited to;
 - Verbal abuse such as offensive remarks, threats, or discriminatory comments.
 - Unwelcome physical contact, including touching pushing, or aggressive behaviour.

- Spreading malicious rumours or deliberately undermining someone.
- Exclusion or isolation that negatively impacts on individual's well-being.
- Racial harassment, including racial slurs, offensive remarks based on race, ethnicity, nationality or skin colour.

2.4 **Sexual harassment** can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment, but are not limited to:

- Physical conduct:
 - Unwelcome physical contact including patting, pinching, stroking, kissing, hugging or inappropriate touching.
 - Physical violence, including sexual assault.
 - The use of job-related threats or rewards to solicit sexual favours.
- Verbal conduct:
 - Comments on a worker's appearance, age, private life, etc.
 - Sexual comments, stories and jokes.
 - Sexual advances.
 - Repeated and unwanted social invitations for dates or physical intimacy.
 - Insults based on the sex of the worker.
 - Condescending or paternalistic remarks.
- Non-verbal conduct:
 - Display of sexually explicit or suggestive material.
 - Sexually-suggestive gestures.
 - Whistling
 - Leering

3 Reporting & Complaints Procedure

3.1 All complaint procedures must be handled in accordance with the Sonic Healthcare UK – Grievance Policy and Procedures.

3.1.1 Informal approach - If an employee who is subject to bullying and harassment wishes to, and confident to address the behaviour directly with the person involved, letting them know that their behaviour is unwelcome and must stop.

- 3.1.2 Formal Complaint** - If informal resolution is not appropriate, or if the behaviour continues, you should report the incident to your line manager immediately, HR, or any designated person within Sonic Healthcare UK. You can submit your complaint by using the Grievance Form via Grievance Policy, outlining the details of the incident(s).
- 3.1.3 Investigation** - Upon receiving a complaint, Sonic Healthcare UK will conduct a prompt, thorough, and impartial investigation. Both the complainant and the alleged harasser will have the opportunity to present their version of events and provide evidence.
- 3.1.4 Outcome** - After the investigation, a decision will be made regarding the appropriate action, which may include disciplinary measures.
- 3.1.5 Appeal** - If you are not satisfied with the outcome, under the Grievance Policy and Procedure, you have the right to appeal the decision by submitting the appeal form (available via Appeal Policy) within 10 working days. The appeal will be reviewed by a senior manager or another appropriate person not involved in the original investigation.
- 3.1.6** Managers should refer to **Appendix 1 - Manager's Guide** for practical steps and best practices in handling complaints and promoting a respectful workplace environment, in line with our Core Values.

3.2 Informal Complaints Process:

- 3.2.1** If the employee wishes to deal with the matter informally, the line manager will:
- Arrange to meet with the complainant to listen carefully with their complaint and to understand their desired outcome.
 - Line manager to conduct a thorough and impartial investigation, by speaking to all involved parties.
 - Facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant.
 - Determine if the matter is serious to escalate to a formal resolution.
 - Ensure that a confidential record is kept of what happens.
 - Follow up after the outcome of the complaint to ensure that the behaviour has stopped.

3.3 Formal Complaints Process:

If the employee wants to make a formal complaint or if the informal complaint process has not led to a resolution, the formal grievance process should be used to escalate the matter. Details of this process can be found in section 7.3 of the Sonic Healthcare UK Grievance Policy and Procedure.

The line manager who initially received the complaint will refer the matter to Human Resources Department to instigate a formal investigation. If the harasser is the line manager then a complaint can be sent to their line manager who will refer to Human Resources Department.

A Senior Manager will assign an appropriate investigation manager to investigate this complaint under the Grievance Procedure.

The independent Investigation Manager will carry out a thorough and impartial investigation, and will:

- Interview the complainant and the alleged harasser separately.
- Interview other involved parties separately
- Decide whether or not incident (s) of bullying or harassment took place.
- Produce an investigation report detailing the investigation, findings and recommendations.
- If the harassment took place, decide what the appropriate resolution for the complainant is, during meeting with the employee; an apology; change to work arrangements; training for the harasser; discipline; suspension or dismissal.
- Follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the complainant is satisfied with the outcome.
- If it cannot determine that the bullying or harassment took place, the employee may still make recommendations to ensure proper functioning of the workplace.
- Keep a record of all discussions and actions taken.
- Ensure that all records concerning the matter are kept confidential.
- Ensure that the process is done as quickly as possible and in any event within a reasonable time-frame.

4 Policy Development

- 4.1 Every 2 years or in light of the legislative changes or further guidance being issued and at Management level.

5 Policy Principles

- 5.1. Sonic Healthcare UK will provide a fair, consistent and effective method of dealing with formal complaints and concerns raised under Sonic Healthcare UK Grievance Procedure.
- 5.2 The Company acknowledges the rights of employees to:
- (a) know the standards expected of them;
 - (b) give an adequate explanation of faults or failings;
 - (c) respond to any alleged conduct issues;
 - (d) be represented during formal grievance procedures by a colleague or recognised Trade Union representative;
 - (e) appeal against an appeal outcome.
- 5.3 There may be times when investigating a complaint leads to formal disciplinary action. No formal disciplinary action will be taken against an employee until the matter has been fully investigated and considered by Management.
- 5.4 Whilst the complaint is being investigated, Sonic Healthcare UK may suspend the employee on full pay (with the exception of suspensions for no right to work) for such period as is necessary. Alternatives may also be explored, for example, a temporary change to shift patterns, working days or departments.
- 5.5 Employees will be given 5 working days' notice of any formal meetings.
- 5.6 It is the employee's responsibility to arrange for their colleague or recognised Trade Union representative to attend the meeting. If the chosen representative is unavailable the meeting will be rescheduled within 5 working days. If this is not possible the employee will be required to select an alternative representative as to not delay the process.
- 5.7 If the colleague is unable to attend the formal meeting, a second meeting may be rescheduled where possible and agreed by the chair. Where the employee fails to

attend formal meetings without just cause or the employee fails to attend for a second time, the meeting may go ahead in their absence and the manager will make a decision based on the evidence available at the time.

- 5.8 Where an employee is unable to attend a formal meeting, they may wish to submit a written statement instead which must be received by the manager prior to the meeting in order to be considered.
- 5.9 To ensure an accurate record of any formal meetings is kept, a member of the HR department will take notes of the meeting. These notes will be shared with the employee within 5 working days of the meeting and the employee will have the opportunity to make any amendments they feel necessary to ensure accuracy.
- 5.10 As minute notes are being taken no recording is permitted within formal meetings. This includes meetings that are held remotely via telephone or video conferencing. Any attempt to covertly record a meeting without authorisation from all parties present may result in disciplinary action.

6 Monitoring & Evaluation

- 6.1 Sonic Healthcare UK recognises the importance of monitoring this bullying harassment policy and will ensure that in line with GDPR, collects statistics and data as to how it is used and whether or not it is effective.

7 Training, and Risk Management

- 7.1 We are committed in adopting a safe and respectful working environment. As part of our proactive approach to preventing bullying and harassment, we aim to provide training and awareness sessions for both managers and staff. These sessions are designed to build understanding, promote positive behaviours, aligned with company core values, and equip individuals with the tools to identify and address inappropriate conduct.
- 7.2 In addition, we conduct regular risk assessments to identify and mitigate any potential risks to staff safety and wellbeing. These assessments help ensure that our working environment remains, inclusive, and free from harassment.

8 Related Documents & Policies

- Investigation and Disciplinary Policy

- Grievance Policy
- Whistleblowing Policy

9 Document approval.

Document Approvals are recorded within the document record card within Sonic Healthcare UKs electronic quality management system (e-QMS).

Approved documents will be marked as active in the footer of the document. Documents that are not marked approved are not considered controlled. Printed copies are not permitted. Records of approval and reference copies of procedures are available from HR@tdlpathology.com.

10 Change Details

Change Request number	Change Detail	Implemented in Version Number
Table Text	Table Bullet	Table Text
Table Text	Table Bullet	Table Text
Table Text	Table Bullet	Table Text

Steps to Handle a Complaint

- **Listen and Document:**
 - Provide a safe and private space for the complainant to speak.
 - Take detailed notes of the incident(s) reported.
- **Acknowledge and Reassure:**
 - Confirm receipt of the complaint.
 - Reassure the complainant of confidentiality.
- **Decide on Next Steps:**
 - Determine if informal resolution is suitable or if escalation to HR is needed.
- **Communicate Clearly:**
 - Keep the complainant informed about the process and next steps.
 - Ensure timely updates throughout the investigation.
- **Follow Up:**
 - Monitor the workplace to ensure the resolution is effective.
 - Check in with the complainant for ongoing support.

- **Do's and Don'ts**

Do:

 - Act immediately when an issue is reported.
 - Treat all complaints seriously and impartially.
 - Keep all documentation secure and confidential.

Don't:

 - Dismiss complaints as minor or misunderstandings.
 - Delay action or fail to escalate serious issues to HR.
 - Discuss complaints with unauthorized individuals.