



BAT CONSERVATION IRELAND

Dignity & Respect Policy & Procedures

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Policy Statement

Bat Conservation Ireland is committed to creating an environment for carrying out its activities, which upholds the dignity and respect of the individual and which supports every individual's right to work or volunteer in an environment which is free from any form of harassment, intimidation or bullying.

Bat Conservation Ireland recognises the right of every individual to such an environment and requires all Staff, Council, Volunteers, Interns and those working on behalf of Bat Conservation Ireland to recognise their responsibilities in this regard. Every person working in conjunction with Bat Conservation Ireland is entitled to be treated with dignity and respect by our representatives. Equally, all persons working in conjunction with Bat Conservation Ireland are expected to support the principles of dignity and respect in relation to their work.

Bat Conservation Ireland is committed to equal opportunity of employment and all employment policies, procedures and practices at the organisation will be based on merit, qualifications and abilities. Employment and recruitment practices will not be influenced or affected by an employees' "race", colour, religion, sex, marital status, nationality, family status, sexual orientation, disability, age or membership of the Traveller Community.

Dignity is about celebrating the individual differences and similarities that each person brings to the organisation. It is about providing a range of perspectives that contribute to solving problems and creativity. It is not solely about different nationalities or genders working together, but embraces a mixture of people in age, education, geographic origin, and family status, type of work, cultures, religions, personal styles and sexual orientations.

1. General Principles

1.1 Scope of the Policy

This policy applies to all Staff, Council members, Volunteers, Interns, clients, suppliers, visitors or any other person with whom Bat Conservation Ireland representatives may come into contact during the course of carrying out activities on behalf of the organisation. Bullying/harassment by non-staff members may result in the termination/non-renewal of business contracts, the suspension/non-renewal of services, exclusion from the premises or the imposition of other appropriate sanctions (must provide copy to contractors/non employees on commencement).

This policy applies to Staff, Council members, Volunteers and Interns across all Bat Conservation Ireland locations and situations, including:

- Places of work of Bat Conservation Ireland, or any other place where an individual is representing Bat Conservation Ireland;
- At events such as social functions, conferences, meetings, field work or work assignments which are related to Bat Conservation Ireland;
- In writing, on the telephone, by e-mail or on the internet;
- When working with and communicating with all members of the public;

1.2 Responsibilities

As a Council / CEO / Manager / Supervisor, your responsibility is to:

- Be aware of the impact of your own conduct and be impartial in your dealings with other Council Members, Staff, Volunteers or Interns;
- Listen to complaints or instances of unacceptable behaviour and agree follow-up action with the complainant(s);
- Take prompt action to stop unacceptable behaviour as soon as it is identified;
- Be alert to the possibility that someone being subjected to unacceptable behaviour may feel reluctant to deal with the matter him/her or seek assistance;
- Ensure that any potentially offensive material is not displayed or circulated within Bat Conservation Ireland (including online);
- Make clear to Council Members, Staff, Volunteers and Interns, including all those new to the organisation that disrespectful behaviour is unacceptable and will not be tolerated by Bat Conservation Ireland;
- Follow and co-operate with this policy.

Supervisors are expected to make clear any aspects of performance that are unacceptable including unsatisfactory performance when carrying out work or activities to further the aim of Bat Conservation Ireland. All comments should be constructive and seek to improve performance.

As an Employee, Volunteer or Intern your responsibility is to:

- Be aware of your role in upholding dignity and respect at work;
- Make sure your own behaviour does not cause offence or misunderstanding;
- Be prepared to offer support to a colleague affected by this type of situation. This support must be constructive and not based on bias and/or taking sides.

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- Follow and co-operate with this policy.

1.3 Definitions

The following are the definitions of bullying, harassment and sexual harassment for the purposes of this policy;

Bullying is defined as repeated inappropriate behaviour, direct or indirect, whether physical, verbal or a psychological nature, conducted by one or more persons against another or others, at their place of work and/or in the course of carrying out activities for the organisation, which could reasonably be regarded as undermining the individual's right to dignity and respect. The bully, intentionally or unintentionally, misuses the power of position, knowledge or personality to domineer, intimidate or humiliate others.

A characteristic of bullying is that it usually takes place over a period of time. It is regular and persistent inappropriate behaviour which is specifically targeted at one person or a group of people. An isolated incident of such behaviour may be an affront to dignity and respect but, as a once-off incident, is not considered to be bullying, e.g. an occasional bout of anger or a conflict of views.

The following are common examples of bullying behaviour (this is not an exclusive list):

- Exclusions with negative consequences;
- Open aggression, threats and/or Menacing behaviour;
- Verbal abuse, including shouting, use of obscene language and spreading malicious rumours;
- Frequent or repeated humiliation, sneering, innuendo or ridicule;
- Unreasonable scrutiny or unreasonable demands;
- Taking credit for another person's work or ideas;
- Undermining a person's authority, reducing a job to routine tasks well below the person's skills and capabilities without prior discussion or explanation;
- Constantly picking on a person when things go wrong even when he / she is not responsible;
- Withholding work related information.

It is important to note that reasonable and essential discipline arising from the good management of an performance, conduct or attendance is not considered to be bullying. Actions taken which may be justified on health and safety grounds will also not be considered to be bullying.

Harassment is defined as: "any form of unwanted conduct relating to any of the discriminatory grounds of gender, civil status, family status, sexual orientation, religion, age, disability, race and/or membership of the Traveller community, which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person."

A single incident may constitute harassment.

The unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display, circulation of written words, pictures or other material.

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The following are common examples of harassment (this is not an exclusive list):

- Verbal harassment – Jokes, comments, ridicule or song;
- Written harassment – including text messages, online communication, emails or notices;
- Treating people less favourably or subjecting them to ridicule on any of the nine discriminatory grounds;
- Demeaning and derogatory remarks, name-calling;
- Isolation, non-cooperation or exclusion within the workplace or social activities;
- Inappropriate comments on appearance;
- Visual displays, e.g. posters, emblems or badges;
- Persistent negative body language;
- Physical harassment, e.g. jostling or shoving or any form of assault;
- Intimidatory harassment – gestures, posturing or threatening poses;
- Undermining the authority of a colleague in the workplace;
- Production, display or circulation of offensive material;
- Excessive monitoring of work;
- Unreasonably changing a person's job content or targets, pressure to behave in a manner that the person thinks is inappropriate, for example being required to dress in a manner unsuited to a person's ethnic or religious background

An act of harassment may occur outside the work premises or normal working hours provided the perpetrator was acting *in the course of employment*, for example, conducting field work or at a training course or work-related social event.

Sexual Harassment is defined as any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

A single incident may constitute sexual harassment.

The unwanted conduct may consist of acts, requests, spoken words, gestures, or the production, display or circulation of written words, pictures or other material.

The following are some examples of inappropriate behaviour which may constitute sexual harassment. These examples are illustrative but not exhaustive:

- Physical conduct of a sexual nature; this may include unwanted physical contact such as unnecessary touching, patting or pinching or brushing against another;
- employee's body, assault and coercive sexual intercourse;
- Verbal conduct of a sexual nature; this includes unwelcome sexual advances, propositions or pressure for sexual activity, continued suggestions for social activity outside the work place after it has been made clear that such suggestions are unwelcome, unwanted and offensive flirtations, suggestive remarks, innuendos or lewd comments;
- Non-verbal conduct of a sexual nature, e.g. the display of pornographic or sexually suggestive pictures, objects, written materials, emails, text-messages or faxes;
- Unwanted or derogatory comments about dress or appearance;
- Leering and suggestive gestures;

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- Gender-based conduct; this includes conduct that denigrates or ridicules or is intimidatory or physically abusive of a Council Member, Employee, Volunteer or Intern because of his or her sex such as derogatory or degrading abuse or insults which are gender-related.

An act of sexual harassment may occur outside the normal work environment or normal working hours provided the perpetrator was acting *in the course of employment or carrying out activities for the organisation*, for example, during field-based work, at a training course or work-related social event.

An essential characteristic of the type of behaviour which constitutes sexual harassment is that it is unwanted by the recipient. This distinguishes it from behaviour which is welcome or reciprocated.

Sexual harassment is unacceptable whether from superiors, peers, juniors, non-Employees or by persons of the same sex.

It is important that all Council Member, Employees, Volunteers and Interns understand that the Organisation is obliged to investigate all complaints of sexual harassment, whether or not it was the intention of the alleged harasser to engage in such behaviour.

Racial Harassment is defined as unwanted or unwelcome conduct based on a person's race which is offensive to the recipient and which might threaten a person's security or create a stressful, hostile or intimidating work environment.

Harassment on the grounds of race may include:

- Verbal harassment: offensive jokes or remarks about a person's race or ethnic origin (including membership of the traveller community), ridicule or assumptions based on racial stereotypes;
- Visual harassment: production, display or circulation of materials offensive to particular racial or ethnic groups, such as cartoons or racial propaganda;
- Physical harassment: physical assault, threats of physical assault.

Lack of Respect can be shown by direct comments, sarcasm, snide remarks, inappropriate jokes or banter directed towards a colleague. It can also arise where colleagues are ignored, overlooked, avoided or shunned and in a manner likely to be hurtful or disrespectful. Jokes or comments directed at or referring to a colleague could be thought amusing by others but unpleasant, uncomfortable or hurtful to that colleague. Respect should be shown to all colleagues. Respect is also earned. By showing respect to others and honouring their personal dignity, a person will earn their respect.

What to do if you feel you are not being treated with dignity and respect.

As part of the commitment to an environment, which upholds dignity and respect, Bat Conservation Ireland has a number of resources available to those who feel that they are the subject of bullying and harassment and has established procedures to deal with informal and formal complaints. As a general rule an attempt should be made to address the complaints/allegations as informally as possible by means of an agreed informal procedure (detailed below). The objective of this approach is to resolve the difficulty with the minimum of conflict and stress for the individuals involved and for the organisation.

1.4 Informal Processes

It is often preferable for all concerned that complaints under this policy are dealt with and resolved informally between the parties whenever possible. This is likely to produce solutions which are speedy, effective and minimise embarrassment and the risk of breaching confidentiality, while also protecting the working relationship.

The objective of the informal approach is to stop the bullying, harassment or sexual harassment with the minimum conflict and stress for the individuals concerned.

While the organisation acknowledges that this may be difficult it does encourage that if you feel you are being harassed or bullied you should, in the first instance, endeavour to make it clear to the person, or persons, causing offence that such behaviour towards you is offensive and unacceptable. The person concerned may not have realised that nature or effect of what they were doing or had done. In many cases, the individual whose behaviour is causing offence may be unaware that his or her actions are inappropriate, or it may be that his or her words or actions have been misinterpreted. In such cases, every attempt should be made to clear up any misunderstanding quickly, on an informal basis.

The informal process provides options for resolving disputes including mediation, where appropriate.

- The informal procedure consists of a low key and non-confrontational approach by the recipient of the behaviour to the party causing offence to advise him/her of the impact of their behaviour and to ask them to cease behaving in this manner;
- The approach should be made in private, and should be non-confrontational. Advice in relation to this procedure should be sought from any Manager in the Organisation;
- Keep a record of incidents so that you can be specific about the behaviour or actions which are causing offence. If such behaviour is having an adverse effect on your work, point this out to them and ask them to stop;
- If speaking to the person fails, or if it proves too difficult to do, there are other sources of help available to you. You may still wish to take an informal approach to resolve the problem with the minimum of conflict;

1.5 Structured Informal Procedure:

Any Council Member, Employee, Volunteer or Intern who feels that s/he is being subjected to behaviour which undermines his or her dignity may either approach the alleged perpetrator directly and make the person aware that the behaviour in question is unwelcome or request a line manager to approach the person on his or her behalf. Sometimes the alleged perpetrator is genuinely unaware that his or her behaviour is unwelcome and causing distress. An informal discussion is often sufficient to alert the person concerned to the effects of his or her behaviour and can lead to greater understanding and an agreement that the behaviour will stop.

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Approach the alleged perpetrator directly

In this case the Council Member, Employee, Volunteer or Intern may find it helpful to rehearse what s/he intends saying to the alleged bully so that s/he feels more confident about initiating the discussion and articulating the precise nature of the offending behaviour and its effects.

Request the intervention of an appropriate line manager

The line manager will attempt to resolve the matter in an informal low-key and non-confrontational manner by making the alleged perpetrator aware of the effects of his/her behaviour and addressing any underlying issues.

Where this does not bring about a satisfactory outcome, the line manager or person who has been on the receiving end of the alleged bullying behaviour may request the intervention of a manager at a more senior level who will endeavour to resolve the matter.

Where the matter remains unresolved, the senior manager may request both parties to consider mediation.

Mediation

Mediation is the preferred method under the Dignity & Respect Policy for the resolution of complaints of bullying and harassment which are not capable of being resolved by local management.

The objective of mediation is to resolve the matter speedily and confidentially without recourse to a formal investigation and with the minimum of conflict and stress for the individuals involved. Mediation requires the voluntary participation and co-operation of both parties in order to work effectively.

An assigned mediator will meet with both parties, usually separately to begin with, to discuss the alleged offending behaviour. The mediator will then bring both parties together to reach a common understanding and agreement on acceptable future behaviour. A mediated agreement seeks to restore harmonious working relations and will not result in the issues being dealt with under the disciplinary policy.

Minimal paperwork and/or records will be generated by this process. Mediation may be attempted at any / all points in the procedure to try to resolve the matter. The parties will be requested to attempt mediation before alleged offending behaviour is the subject of a formal investigation. Mediation may be attempted again during the formal investigation or following the outcome of the investigation.

- You need to inform your supervisor. The supervisor may ask you to detail the complaint in writing. If assistance is needed for this the supervisor can give a framework and offer assistance and can be done there and then if agreed by complainant. The reason for this is to ensure clarity of the complaint;
- If the complainant is the supervisor s/he must inform the Chairperson;
- If the complaint is made against the Chairperson, the complainant must then inform one of the other Directors of the organisation;

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- The nature of the complaint will be outlined to the accused person and a date set for an informal meeting. The supervisor will facilitate this. A number of meetings may be required. The first meeting will occur as soon as is possible but not exceeding 10 working days of the complaint being brought to the supervisor's attention;
- The parties involved will outline their difficulties/complaints to each other and will work towards identifying possible solutions;
- A formal record will be maintained of this process and review meetings will be agreed. Individual parties may keep their own notes if so desired;
- It may be appropriate to engage the services of a mediator/counsellor to assist with part of this process, but this will still be viewed as a step in the informal process;
- The supervisor will inform the Chairperson that a complaint has been lodged and that it is being dealt with through the informal procedure. Exact details and specific information is given only on a need to know basis;
- The Chairperson may nominate another Director to assist with further steps if necessary;
- The outcomes of the informal meeting(s) will be fed back to the Chairperson;
- For whatever reason the informal procedure may be by-passed and the formal procedure may then be invoked;
- Bat Conservation Ireland will endeavour to support all parties involved to continue the informal procedure until all aspects have been exhausted.

1.6 Formal Procedure

- It is acknowledged that it may not always be practical to use the informal procedure to resolve an issue. The Council Member, Employee, Volunteer or Intern may not feel comfortable to approach the other party, or they may feel that the issue is too serious to be addressed through the informal procedure. In such circumstances, or where the informal process has failed to resolve an issue, the formal procedure set out in this policy should be followed;
- In order to make a formal complaint an initial approach may be made to any Manager regarding the issue. Although the initial complaint may be provided verbally, it is a requirement that the complaint is lodged in writing to ensure that a fair process may be followed. Where assistance is required to put the complaint in writing, the Council Member, Employee, Volunteer or Intern should consult the Chairperson to arrange this.

The complaint should state:

- The name of the alleged perpetrator;
- The nature of alleged harassment i.e. the behaviours/conduct constituting harassment/sexual harassment;
- Dates/times and locations of where and when the alleged harassment / sexual harassment occurred;
- Names of witnesses to any alleged incidents;
- Details of any action already taken to stop the harassment / sexual harassment.
- Consent to your identity and the facts of the allegation being disclosed to the alleged perpetrator. This is required in order to allow the Organisation to investigate and to take action in appropriate circumstances.

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If the behaviour complained of does not concern harassment or sexual harassment as defined, an alternative approach may be put in place and a rationale recorded. If there are no concrete examples given, it will be deemed that there is no complaint to be answered by the alleged perpetrator as they have no recourse to repudiating an accusation that doesn't give any specifics.

Where an alternative approach is not deemed appropriate, the alleged perpetrator(s) will be notified in writing that a complaint has been made against him/her, and provided with a copy of this complaint. The person investigating the complaint will indicate a timeframe for the resolution of the complaint; however, such timeframes may be extended where necessary. He/she shall be afforded a fair opportunity to respond to the allegation(s), normally five working days.

- If you wish to make a formal complaint, you must do so in writing to your supervisor. If the complaint is being made against the supervisor the formal complaint must be addressed to the Chairperson. Written complaints should contain details of the person or persons against whom the complaint is being made and where possible, details of the alleged act or acts of bullying or harassment. The complaint should be confined to precise details of actual incidents;
- Any person against whom a formal complaint is made will be informed immediately (within 5 working days) of the complaint. This person will be informed, in writing, that allegations of bullying/harassment/lack of respect etc. have been made and he/she will be given a copy of the complainant's statement and advised that he/she will be given a fair opportunity to respond to the allegation(s);
- The complainant allegations will be subject to an initial examination by the nominated members of management in order to determine an appropriate course of action. An example of this could be exploring a mediated solution or a view that the issue can be resolved informally. Should either of these approaches be deemed inappropriate or inconclusive, a formal investigation will take place with a view to determining the facts and the credibility or otherwise of the allegation(s).

Prior to commencing an investigation, the complaint and the response may be subject to an initial examination by a designated impartial member of Management or other appropriate person, with a view to determining an appropriate course of action. An appropriate course of action at this stage could, for example, include exploring a mediated solution or a view that the issue can be resolved in accordance with the Informal Procedure. Should either of these approaches be deemed inappropriate or inconclusive, a formal investigation of the complaint will be undertaken with a view to determining the facts of the case. In all cases there will be no inference of guilt against the alleged perpetrator, and they will be afforded a fair opportunity to respond to the allegation. The principles of natural justice will be adhered to throughout the investigation process.

All Council Members, Employees, Volunteers or Interns involved in an investigation must respect the need for confidentiality; a failure to do so may represent a serious disciplinary offence. Confidentiality is assured in so far as it is reasonably practicable. Both parties may be suspended with pay, without any negative inference, pending the outcome of an investigation, where deemed appropriate by Management. However, where this is not possible, the parties to the complaint will be expected to maintain a positive working relationship.

1.7 Investigation

Where a decision is taken to proceed to formal investigation, the following principles will apply:

- The investigation will be conducted thoroughly and objectively and with due respect for the rights of both the complainant and the alleged perpetrator;
- Both parties will be required to co-operate fully with the investigation;
- Notwithstanding the difficult circumstances, both the complainant and the alleged perpetrator will be expected to continue with their normal duties and maintain a professional working relationship during the course of the investigation. Management will however have due regard at all times for its obligations to safeguard the health, safety and welfare of Council Members, Staff, Interns and Volunteers;
- All evidence provided to assist with the investigation will be treated as confidential;
- The investigator may interview anyone who they feel can assist with the investigation. Council Members, Staff, Volunteers and Interns are expected to co-operate fully with the investigation and will be fully supported throughout the process;
- Council Members, Staff, Volunteers and Interns who participate in the investigation process will be required to respect the privacy of the parties involved by refraining from discussing the matter with other work colleagues or persons outside the organisation;
- It will be considered a disciplinary offence to intimidate or exert pressure on any person who may be required to attend as a witness.

Guidelines on conducting an Investigation

Both parties will be given a copy of the investigation report and an opportunity to comment before any action is decided upon by management.

- The Chairperson will appoint the investigators. The investigators will be nominated from the management and/or Council of the Organisation. The Chairperson may, depending on the situation, appoint an external investigator on their behalf;
- Terms of Reference will govern the investigation. These terms will be agreed by the Chairperson of Bat Conservation Ireland and circulated to all parties involved;
- The investigation team will meet with the complainant and alleged party and any witnesses or relevant persons on an individual basis with a view to establishing the facts surrounding the allegations. All persons interviewed may be accompanied by a work colleague or other appropriate representation, e.g. Trade Union rep, if so desired;
- Every effort will be made to carry out and complete the investigation as quickly as possible and within a time frame outlined in the Terms of Reference. On completion of the investigation, the investigation team will submit a written report to the Chairperson containing findings and recommendations for approval;
- Both parties will also be informed in writing of the findings of the investigation;
- Both parties will be given the opportunity to comment on the findings before the Chairperson decides upon action;

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- Should management decide the complaint is well founded the alleged party will be given formal interview to determine an appropriate course of action. Such action could, for example, involve counselling, action plans for change of behaviour, monitoring through support and supervision sessions and/or review dates, monitoring and progression of the issue through the grievance and disciplinary procedure of Bat Conservation Ireland;
- If either party is unhappy with the outcome of the investigation the issue may be processed through the normal industrial relations mechanisms.

Outcome

- If the complaint is upheld, the matter may be further progressed through the disciplinary procedure;
- The complainant and the alleged perpetrator will be informed in writing of management's decision;
- Management will take appropriate action based on the outcome of the investigation;
- Where an investigation is inconclusive and the complaint is not upheld, there will be no negative inference against any party to the complaint. All parties to the complaint will be expected to continue working as normal, and to conduct themselves in an appropriate manner at work;
- In the interests of all Council Members, Employees, Volunteers and Interns any knowingly false or reckless complaints will be treated very seriously and may lead to disciplinary action against the complainant;
- Where it is found that the complaint was malicious or vexatious, then a disciplinary hearing will be held with the complainant to explore this further. In this situation only, may a disciplinary sanction be imposed on the complainant. Lodging a malicious or vexatious complaint is a serious disciplinary offence, and, depending on the seriousness of the issue, may be deemed gross misconduct by the Organisation and may result in summary dismissal;
- Victimisation or retaliation against a complainant, witness or any other party will constitute a serious disciplinary offence.

In all cases, whether the complaint is upheld or otherwise, the Organisation's environment will be monitored to ensure that the parties to the complaint conduct themselves in an appropriate manner and do not engage in any improper conduct. Appropriate support will be made available to both parties. The Organisation will take such action as is required to eliminate the risk of that behaviour recurring or continuing and will keep records of interventions used for this purpose.

1.8 Disciplinary Procedure

If it is intended to take disciplinary action, Bat Conservation Ireland's policy on Disciplinary Procedures will be followed.

1.9 Counselling

Bat Conservation Ireland will provide a contact point with local counselling services. Often those whose behaviour is causing problems may be unaware of, or insensitive to, the impact of their actions and counselling can help change behaviour and prevent future incidents. A Council Member, Employee, Volunteer or Intern who is unaware or reluctant to accept that their behaviour is causing problems may be directed by management to take steps to look at changing this behaviour. These steps will be decided upon by management and will depend on the nature of the issue at hand. People who have experienced harassment or bullying may also find counselling helpful.

1.10 Malicious or Vexatious Complaints

Malicious complaints have no place in a work environment committed to dignity and respect for all. Complaints found to have been made maliciously will be treated seriously and may result in disciplinary action, and depending on the seriousness of the issue, may be deemed gross misconduct by the Organisation and may result in summary dismissal.

1.11 Retaliation or Victimisation

Retaliation or victimisation, including dismissal or any other adverse action against a person, resulting from the person's lodging a complaint, participation in the investigation of a complaint, or for representing or providing support to a complainant will result in the organisations disciplinary procedure, up to and including dismissal. Similarly, an employee intending to take action before the Workplace Relations Commission or for having opposed an act unlawful under this policy will not be victimised.

1.12 Monitoring

The policy will be monitored in line with any complaints made and the outcome of them. Bat Conservation Ireland is also committed to monitoring the Organisation to ensure it is harassment, bullying and sexual harassment free environment.

1.13 Reviews

The policy will be monitored and amended as required in line with changes in practice and legislation.

1.14 The Law

This policy is underpinned by national legislation:

- Workplace Relations Act, 2015
- Employment Equality Act, 1998 to 2015
- Prohibition of Incitement to Hatred Act, 1989

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- Safety, Health and Welfare at Work Act, 2005
- Equal Status Act, 2000-2010
- This policy is also influenced by the Health and Safety Authority's Code of Practice on the Prevention of Workplace Bullying.

1.15 Third Party Harassment / Sexual Harassment

The procedures outlined in this policy should be employed to deal with harassment or sexual harassment by a third party. Sanctions which may be imposed on a third party may include exclusion from the premises, termination of a contract, or other measures to prevent the recurrence of the inappropriate behaviour.

1.16 The Law and Individual Rights

This policy aims to ensure that any problems of bullying and harassment which occur can be resolved within Bat Conservation Ireland. Using the Complaints Procedure will not affect the complainant's right to make a complaint under the Employment Equality Acts, 1998 & 2004 or the Equal Status Acts 2000 & 2004.

1.17 Responsibilities

Management will endeavour to ensure that this policy is communicated to all Council Members, Employees, Volunteers and Interns and will ensure that the policy is maintained and updated in line with legislative changes and any amendments to the relevant Code of Practice. Where required, measures will be taken to ensure the accessibility of policies and procedures for all Employees.

Management has a particular responsibility to prevent workplace harassment and is expected to lead by example, promote awareness of this policy, be vigilant for signs of harassment, tackle problems before they escalate, deal sensitively with individuals involved in a harassment complaint and monitor the situation in the workplace so that harassment or sexual harassment does not occur or reoccur.

Council Members, Employees, Volunteers and Interns are expected to conduct themselves so as to respect the rights of others to dignity in the Organisation, to comply with this policy and to raise issues of concern through the procedures outlined in the policy.

1.18 Appeal

Either party may appeal the decision, outlining in writing to Management the reason for the appeal. Such appeals will be heard by a Manager or Council Member not previously involved in the investigation and independent advice and support will be sought if required.