

### **Statement of commitment**

The S&P Sephardi community is committed to creating and maintaining a working and communal environment that encourages harmonious, respectful, and dignified relations and equality of opportunity for all employees, lay leaders including trustees, volunteers and all Yehidim of the Kahal.

The Trustees, Senior Rabbi, and Chief Executive commit to ensuring that under their leadership there is embedded a good workplace and community culture where professional standards are maintained and move away from any conduct which can allow bullying to flourish.

The S&P Sephardi community will not, therefore, tolerate any form of harassment (e.g., unacceptable behaviour by one person against another person or persons) within the organisation. Allegations of bullying and harassment will be taken seriously by the leadership of the community.

### **Purpose and Scope of this Policy**

The S&P Sephardi Community has a zero-tolerance approach to bullying and harassment. Our aim is to provide an environment where everyone is treated with dignity and respect and can work and be part of the Kahal without fear of bullying or harassment. It aims to ensure that individuals we employ, members and volunteers feel confident to bring complaints, or to challenge behaviour, without fear of ridicule or reprisal.

This policy is written in conjunction with related employment policies and the Ascamot to acknowledge the communal nature of the organisation and the involvement of lay leaders and volunteers in its running.

### **Related policies**

- The Staff Employment Handbook provided by Peninsula HR services including the Personal Harassment Policy and Procedure, Whistleblowing Policy, and Disciplinary Policy
- The S&P Sephardi Community Safeguarding Policy
- Trustees Code of Conduct
- Volunteers Code of Conduct
- Ascamot 10.4 and 10.5\*

### **Standards of Behaviour**

The S&P Sephardi Community expects the highest standards of behaviour from all those who participate in any way in its activities, whether in a salaried, stipendiary, or voluntary position. In particular, it expects that all will avoid behaviors that could lead to allegations of bullying or harassment.

The Trustees, Senior Rabbi and Chief Executive recognize the importance of setting a

good example. They acknowledge that a culture where rabbis and staff are consulted, and problems are discussed is less likely to encourage bullying and harassment than one where there is an authoritarian leadership style.

Harassment, discrimination, or victimisation in any form will not be tolerated. All employees, trustees of the S&P and its associated charities, volunteers, and consultants will be expected to comply with this policy and act appropriately to ensure that such conduct does not occur.

### **Communication and Training**

The laity, rabbis and employees recognize the importance of setting a good example to the Kahal and undertake to participate in any relevant training offered in support of this policy.

The Parnas Presidente and CEO together with the HR advisor to the Kahal are responsible for encouraging and monitoring the implementation of the Policy.

The Kahal will be notified that such a policy has been created.

This policy will be reviewed every two years and the next review is due in June 2025.

### **What is bullying?**

Any behaviour that could potentially undermine someone's dignity and respect should be regarded as unacceptable. If it is not challenged, it is likely to escalate and lead to significant difficulties for all concerned.

Bullying and harassment includes any behaviour which an individual or group knows, or ought reasonably to know, could have the potential effect of offending, humiliating, intimidating, or isolating an individual or group to the extent that it causes actual harm or distress, normally but not exclusively after a series of incidents so over a prolonged period of time. Bullying can also be described as an abuse or misuse of power.

Lack of intent does not diminish, excuse, or negate the impact on the target or the distress caused.

### **Examples of bullying behaviour include but are not limited to:**

- verbal, written, physical or psychological threats
- humiliating, shouting, or swearing at, or threatening an individual in public or private
- blocking promotion and training opportunities without good reason
- overbearing and intimidating levels of supervision
- singling out or treating an individual less favourably without justification
- inappropriate derogatory remarks about a person or their performance
- use of e-mails, either to the individuals or to third parties, to undermine an employee

It is important to distinguish between bullying and reasonable behaviour to address shortcomings in performance or asking individuals to account for their actions. The S&P Sephardi community expects its senior employees and trustees to address such matters in a respectful and supportive manner.

### **What is harassment?**

Harassment is unwanted conduct that violates an individual's dignity, or that creates an intimidating, hostile, degrading, humiliating or offensive environment for the recipient. It may be related to age, sex, disability, religion, sexual orientation, nationality, or any personal characteristic of the individual, and may be persistent or an isolated incident. The key issue is that the actions or comments are viewed as demeaning and unacceptable by the recipient.

**Examples of harassment include:**

- spreading malicious rumours, or insulting someone by word or behaviour, verbally or in writing
- ridiculing or demeaning someone, picking on them or setting them up to fail.
- exclusion or victimisation.
- unfair treatment.
- misuse of power or position.
- unwelcome sexual advances, touching, standing too close, display of offensive materials, asking for sexual favours.
- making threats or comments about personal circumstances that may cause anxiety without foundation.
- deliberately undermining an individual by overloading and constant criticism.
- intentionally blocking promotion or training opportunities.

Bullying and harassment do not necessarily occur face to face, they may occur through written communications, visual images, email, phone, social media and other.

The most serious incidents of bullying and harassment might result in:

- creating an unsafe environment
- ignoring signs of overwork and extreme stress
- putting someone's health physically, emotionally, or psychologically at risk by making
- them upset, frightened and/or ridiculed

Further definitions of harassment are outlined in the S&P Peninsula Employment Handbook (page 35).

**Dealing with allegations of bullying and harassment**

The aim of this policy is to ensure members of staff, lay leaders and volunteers feel confident that in bringing to attention examples of bullying or harassment the matter will be investigated appropriately and that they will not be victimised or penalised.

All complaints about bullying or harassment should be made to the Chief Executive or the Safeguarding Trustee whether related to an employee, rabbi, or trustee of the S&P or one of its associated charities including the Parnas Presidente. Where the complaint is related to the Safeguarding Trustee or the Chief Executive it should be made to the Parnas Presidente.

**Employees**

Paid employees of the S&P Sephardi community should follow the guidance in the S&P

Peninsula Employment Handbook with regards to making a complaint or if they find themselves the subject of the complaint.

Appropriate disciplinary action, will be taken against any employee who violates the staff policy. Any manager failing to take corrective action will be viewed as not fulfilling the responsibilities of their position, which may be treated as a disciplinary offence. Procedures for such circumstances are set out in the related policies in the S&P Peninsula Employment Handbook.

### **Trustees/Lay Leaders/Volunteers**

Any trustee/lay leader / volunteer found to have fallen short of the standards expected in this community policy following an investigation will be required to undertake training and offer a written apology. There may be circumstances where such an individual will not be permitted to continue to serve in a communal role and may be barred from doing so in the future.

Where a complaint relates to a trustee, the complainant is assured that the trustee being complained about will not be involved in the investigation and it may be suitable to bring in an independent person to investigate.

Those who bully or harass are not always colleagues or managers but may be members or contractors. If a complaint is made involving a member or contractor this should be reported to the CEO who will discuss it with the Safeguarding Trustee and the HR advisor.

### **Support**

Support for employees who are experiencing bullying and harassment is available from the HR services at Peninsula.

### **Confidentiality**

Should complaints about bullying and harassment be raised they will be treated with absolute confidentiality in order to protect all parties.

### **False Allegations**

False allegations are a serious matter. Where members of staff raise unfounded allegations maliciously, they will be dealt with under the S&P Sephardi Community's Disciplinary Policy and Procedure.

## **Appendix 1**

### **I think I have been the target of bullying or harassment, what can I do?**

1. If you are an employee, please refer to the relevant policies in the S&P Peninsula Employment Handbook. This will ensure that the process is followed appropriately.
2. If you are experiencing bullying or harassment do not suffer in silence or feel that you are to blame in some way for inviting bullying behaviour.
3. Keep a factual log of all incidents of bullying – dates, times, nature of incident, details of

accusations, criticisms, emails, and other correspondence. This may be needed as evidence should harassment, victimisation or bullying continue or subsequently recur.

4. If others have witnessed bullying incidents, ask if they will support you.

5. It may be possible for the complaint to be resolved quickly by explaining directly to the harasser or bully the effect their behaviour is having, and that you want it to stop. By trying the informal route, you may be able to get the harasser or bully to stop their behaviour and so prevent the matter becoming public, or of escalating and making your situation more difficult.

6. It has been shown that it is rarely advisable for an individual to confront a bully alone, without professional support. Speak to the CEO to discuss with them whether to confront the alleged harasser, alone or with their support or whether you would like them to talk to the alleged harasser on your behalf.

7. Every effort should be made to use informal means, including considering alternative dispute resolution such as mediation or restorative justice, to stop the offensive behaviour before formal procedures are invoked. It is worth discussing whether mediation is an appropriate response in the particular situation before proceeding further. You should also make it clear that if the behaviour continues you will make a formal complaint. This may be enough to sort things out, particularly if the person(s) involved was/were unaware that their behaviour was causing offence.

8. Whenever possible, any complaint of bullying or harassment should be notified, in confidence, to the CEO. Once the situation has been concluded, the CEO will monitor the situation as appropriate.

9. The transition to a formal process will involve the CEO consulting with the HR Advisor. If the matter is deemed sufficiently serious, they will make a file note of action taken and with your permission, institute an investigation under the formal procedures.

## **Appendix 2:**

### **I have been accused of bullying or harassment, what can I do?**

1. If you are an employee, please refer to the relevant policies in the S&P Peninsula Employment Handbook. This will ensure that the process is followed appropriately.

2. Bullying and harassment are matters that must be taken seriously. An accusation does not signify a judgement that you are guilty, and there will need to be a discussion with you in order to establish the true nature of the situation. It is possible that there might be a problem that has arisen because you have not realised the effect of your actions and you may not have intended the effects complained of.

3. The perception of the person complaining of bullying or harassment is, however, an important factor in determining whether or not harassment has taken place – simply to

deny there is a problem, or that the problem lies with the person complaining won't normally be sufficient.

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4. You are encouraged to contact the CEO if you have been accused of bullying and harassment. The aim will be to facilitate discussion with a view to resolving the problem at source if possible.

5. In many cases the problem will be resolved informally through discussion. You will be asked to reflect on your behaviour and the possibility that you might be at fault, whether consciously or not. Mediation with an external mediator might be appropriate.

6. If an informal process is unsuccessful, consideration will be given to moving to a more formal process. Any formal procedures will be fairly and properly followed. Details relating to the circumstances that gave rise to the complaint, the evidence of witnesses and the nature of the relationship between the person complaining and yourself will all be considered.

7. Throughout any informal or formal procedures the principal objective is that of identifying the underlying issues and eliminating the cause of offence as quickly as possible and with minimal recrimination.

8. As a result of informal or formal action you may be offered help to recognise, understand and modify your behaviour; you are strongly advised to accept this help. Under certain circumstances a refusal to accept help could be a disciplinary issue.

#### **\*Ascama 10.4 and 10.5**

**Ascama 10.4(ii) and Ascama 10.5 (a)-(d) outline the requirement for Trustees and committee members not to bring the Kahal into disrepute and the possible outcomes should such behaviour be proven. This policy works in conjunction with these Ascama providing more detail about the circumstances and process for dealing with specific conduct complaints.**