

Policy on Bullying and/or Harassment of Participants in HRB-funded Research

Policy Statement

The Health Research Board (HRB) believes that everyone involved in HRB-funded activities should be able to work in an environment where everyone is treated, and treats others, fairly and with respect. It considers bullying and harassment of any kind, in any context, to be unacceptable. Bullying and/or harassment can have devastating effects on the health, confidence, morale and performance of those subjected to them. Bullying and harassment may also have a damaging impact on employees not directly subjected to inappropriate behaviour but who witness it or have knowledge of it.

This policy forms part of our grant terms and conditions and should be considered alongside our policies on good research practice and research misconduct.

1. Definitions

Bullying is defined by the Task Force on Prevention of Workplace Bullying¹ as any repeated inappropriate behaviour, direct or indirect – whether verbal, physical or otherwise – conducted by one or more persons against another or others at the place of work or in the course of employment, which could reasonably be regarded as undermining the individual’s right to dignity at work.

Harassment as defined in the Equality Act 2004² provides further clarification of the term ‘dignity’ as any behaviour and conduct that fails to consider that person and creates an intimidating, hostile, degrading, humiliating or offensive environment for the person.

2. Responsibilities of participants in HRB-funded research

We expect all participants involved in HRB funding to treat each other with dignity and respect. This policy applies to all participants in HRB-funded research, including but not limited to:

- Lead applicants (Principal Investigators)
- Co-applicants/Co-investigators
- Collaborators/Co-funding partners
- Mentors, and supervisors

¹ <https://irishequity.ie/wp-content/uploads/2015/12/EquityBullyingHarassmentPolicy.pdf>

² <http://www.irishstatutebook.ie/eli/2004/act/24/enacted/en/pdf>

- Staff members employed on the award
- Third parties providing goods or services for the award
- Advisory Board/Steering Committee members

Where a participant in HRB-funded research wishes to make an allegation of bullying and/or harassments against another participant in HRB-funded research, we expect the complainant(s) to use the policies and processes in place in the relevant Host Institutions. The HRB should not be approached with allegations.

3. Responsibilities of HRB host institutions

In line with the HRB Terms and Conditions of funding, it is the responsibility of HRB host institution to:

1. Have a Bullying and Harassment Policy in place that clearly sets out:

- the standards of behaviour it expects from all staff, students, and contractors
- their procedure for responding to complaints
- a clear point of contact for receiving complaints

The policy should be available to all staff and should be easily located on the website of the host institution.

2. Ensure that there is an equivalent policy in place at any sub-awardee organisation, if relevant.

3. Respond promptly and in confidence to allegations of bullying and/or harassment. Allegations should be investigated in an impartial, fair and timely manner.

4. Take appropriate actions where an allegation is upheld.

5. As per the HRB Grant Terms and Conditions, alert the HRB Director of Research Strategy and Funding (BandHpolicy@hrb.ie) about any allegation of bullying and/or harassment against a participant in HRB-funded research that is upheld. This should only happen once the full internal investigative process is complete, including any appeal.

The information that should be provided to the HRB includes:

- the name of the person against whom the allegation has been upheld
- a brief factual statement about the nature of the allegation
- a brief factual statement on the outcome of the investigation, including any sanctions, and any other information that is deemed relevant, on a case-by-case-basis.

The HRB does not need to receive any sensitive personal information about either party to the allegation. Allegations that are not upheld should not be reported to the HRB.

6. Any information provided to the HRB by the Host Institution will be:

- Stored in accordance with data protection legislation and GDPR requirements
- Communicated on a need-to-know, restricted-access basis only

- Updated and/or deleted in line with our retention policy

4. Responsibilities of the HRB

Complainants should not contact the HRB directly with allegations that are the responsibility of the Host Institution to process. Therefore, if an allegation of bullying and/or harassment is made to the HRB rather than to the relevant HRB Host Institution we will refer the individual making the complaint (complainant) to their Host Institution. The Host Institution is then responsible for enacting their processes and procedures for handling allegations of bullying and/or harassment.

The HRB does not carry out its own investigations, but we may, as part of our audit process:

- check that the HRB Host Institution has a policy in place and that it is accessible to all staff at the Host Institution
- ask for information about a HRB Host Institutions' processes and procedures and how these are being implemented

Should a Host Institution uphold an allegation of bullying and/or harassment against an individual associated with a HRB award, the Host Institution must notify the HRB of this as per Section 3 of this policy and Clause 14 of HRB Terms and Conditions.

5. Sanctions

If a HRB Host Institution upholds a bullying and/or harassment allegation, the HRB may apply our own specific sanctions that may be independent of those set by the Host Institution. We may for example:

- send a letter of reprimand to the subject of the upheld allegation ('complainee')
- remove the subject of the upheld allegation from the affected award(s)
- withdraw funding from the subject of the upheld allegation on the affected award(s)
- bar them from being a supervisor or mentor on a HRB-funded award
- temporarily or permanently restrict them from future HRB grant applications (or specific type of grant applications)
- allow future grant applications, but require the HRB Host Institution to monitor the way the subject of the upheld allegation manages staff

We may apply sanctions against a HRB Host Institution if we find that it has failed to:

- respond to a bullying and/or harassment promptly and objectively
- keep the HRB informed of the outcomes of a upheld allegation

Sanctions against a HRB Host Institution may include:

- not accepting new grant applications for a limited and specified period of time
- restricting applications for specific grant types
- suspending funding to the organisation in extreme cases

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