Workplace Bullying Policy

Policy Summary

PATH is committed to providing a safe, supportive, and respectful environment for all personnel. To further these values, PATH does not tolerate abusive conduct or bullying. Workforce bullying refers to a pattern of repeated unreasonable actions of an individual (or a group) directed towards an employee (or group of employees), which intimidate, degrade, humiliate, or undermine; or which create a risk to the health or safety of the employee(s). Bullying behavior may take many forms including physical, verbal, or written acts or behaviors. Workplace bullying often involves an abuse or misuse of power.

Violations of this policy may result in disciplinary action, up to and including termination of employment or contract.

Workplace Bullying Examples

Examples of bullying may include:

- Persistent or egregious use of abusive, insulting, or offensive language directed at an individual.
- Aggressive behavior that frightens, humiliates, belittles or degrades, such as insulting remarks, shouting, angry outbursts, finger pointing, invading someone else’s personal space, and harsh emails or texts.
- Spreading misinformation or malicious rumors.
- Making repeated inappropriate comments about a person’s appearance, lifestyle, family, or culture.
- Regularly teasing or making someone the brunt of jokes or pranks.
- Inappropriately interfering with a person’s personal property or work equipment.
- Circulating inappropriate or embarrassing photos or videos via email, text, or social media, or taunting on social media.
- Pushing, shoving, kicking, poking, tripping, or other physical assault or threat of physical assault.
- Staring, glaring, or other nonverbal demonstrations of hostility or threatening gestures or glances.
- Purposefully and inappropriately excluding, isolating, or marginalizing a person from normal work-related activities.
- Encouragement of others to turn against the targeted employee.
- Manipulating the ability of someone to do their work, such as removing tasks or tools that are imperative to job performance, withholding information that is necessary for the person to do the job, or giving deliberately ambiguous instructions.
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave.
- Constant criticism on matters unrelated or minimally related to the person’s job performance or job description.
- Public reprimands.
- Repeatedly accusing someone of errors that cannot be documented.
- Monitoring another without a legitimate business reason.
- Undermining employees by demeaning their work standards, not giving them credit or stealing credit for their work, setting them up for failure, or repeatedly reminding them of old mistakes.
- There is a difference between bullying and appropriate management or feedback. Examples of reasonable actions, when carried out in an appropriate manner, include:
  - Providing performance coaching or feedback on job performance.
  - Re-balancing workload to core job duties as part of performance management.
  - Monitoring or restricting access to sensitive information for legitimate business reasons.
  - Scheduling ongoing meetings or other check-ins to address performance issues.
  - Setting aggressive performance goals to help meet departmental, program, or other organizations goals.
  - Counseling or disciplining an employee for misconduct or violation of PATH policy.
  - Investigating alleged misconduct or policy violation.

Differences of opinion, interpersonal conflicts, and occasional problems in working relations are an inevitable part of working life and do not necessarily constitute workplace bullying.

Reporting Incidents of Bullying

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents.
of bullying. PATH strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. PATH will make every effort to stop alleged workplace bullying before it becomes severe or pervasive, but can only do so with the cooperation of all personnel.

If you believe that you are experiencing or have observed conduct that violates this policy, please contact your manager or Human Resources Business Partner, or, if you are not comfortable contacting these individuals, please contact any Human Resources Business Partner, or any Human Resources Director, or the Chief People Officer. Managers who observe bullying behavior or receive a report of bullying are required to report it immediately their Human Resources Business Partner.

The availability of this reporting procedure does not preclude individuals who believe they are being subjected to bullying conduct from promptly advising the offender that the behavior is unwelcome and requesting that such behavior immediately stop.

Resolution

Human Resources will promptly assess all allegations of bullying in violation of this policy. PATH strives to ensure that bullying complaints are addressed sensitively, promptly, and in accordance with PATH policy. All reasonable steps will be taken to respect the confidentiality of the people involved in a complaint. PATH is committed to facilitating a fair and impartial resolution process.

Options for resolving potential violations of this policy will vary depending on the circumstances and may include a facilitated resolution or an investigation. The goal of a facilitated resolution is to resolve concerns at the earliest stage possible with the cooperation of the parties involved. PATH encourages early resolution and HR will assist the parties in reaching a mutually agreeable resolution when the parties wish to resolve the situation collaboratively. In some cases, HR may determine that a facilitated resolution process is either insufficient or unsuccessful, and an investigation is warranted. Investigations will be conducted with due regard to procedural fairness, timeliness, and the individuals’ safety and well-being.

PATH will respond to reports of bullying brought anonymously or by third parties not directly involved in the complaint. However, sufficient information about the alleged or suspected activity is required to adequately assess the allegations and/or initiate an investigation.

Retaliation

This policy prohibits retaliation (such as threats, intimidations, reprisals and adverse actions related to employment) against any person who reports workplace bullying, assists someone with a report of bullying, or participates in an investigation or resolution of a bullying complaint.