

## **Why policy is not enough.**

I've spoken to people from many different organisations about issues of bullying and harassment. I've seen members of HR departments struggling hard to tackle the problem head on, but I've also seen those who smile and take on a righteous glow because they know they have it sorted: they have a POLICY. I don't want to cause distress by popping anyone's balloon, but in this instance there really is no alternative, it's time to point out that policy may be a great start but it is not the panacea for all things bullying and harassment.

It's true that having a policy raises the profile of bullying and harassment thereby suggesting that the organisation takes it seriously enough to have put in place ways and means of dealing with incidents that may arise. You would think then that employees should be able to take comfort in the knowledge that their company has the policy and procedures to ensure a psychologically safe and positive working environment. Unfortunately this doesn't reflect the reality as there are many pitfalls and misperceptions about the effectiveness of both the process of developing policy and of its product.

Organisations vary enormously in their approach to policy creation. For larger or more bureaucratic ones it may be a task to be undertaken by an in-house specialist department, or a case for calling in external assistance to obtain that impressive bespoke 'Rolls Royce' of all policies. More usually it will mean that somebody has to spend hours trawling the Internet in pursuit of likely looking policies used by organisations with a similar profile. These may then be lifted wholesale, after all they must be okay if they've been tried and tested elsewhere, or they may be judiciously reworded or have cherry-picked passages mixed and matched with others either to salve consciences or more likely to avoid claims of plagiarism or breach of copyright. Very few organisations will have consulted with employees or their representatives in the development process: involvement generally starts at the stage of adoption, rather than conception and gestation. This is the first pitfall.

Before embarking on the creation of a policy there are a number of questions that need to be answered. Perhaps first and foremost it is important to analyse the requirements of the organisation, decide the purpose of the policy, and for whom it is written. Not all policies originate from a desire to tackle bullying and harassment. There is a need to be honest and realistic: is the policy a box-ticking exercise, is it there to protect the organisation, is it there to discourage complaints, or is it there to encourage employees to challenge unacceptable behaviour? The criteria used in creating the policy will impact upon its usage and effectiveness. Convolved and jargon-filled policies may satisfy the legal eagles, but, intentionally or unintentionally, their language and size may also serve to discourage others. Remember, if the policy is to be designed for all members of the organisation, the pre-planning stage should consider how the various interests (e.g. management, trade unions, line workers, minority group members, remote sites) might be engaged in the process.

Whether the draft policy is a product of piracy, commission or committee it is always a good idea to check the offerings against the needs and experiences of the organisation. This might include tasks such as looking at how the new policy would have coped with past or even notional issues, but attention should also be paid to the

wording. The KISS (Keep It Simple Stupid) maxim could almost have been written for policy designers. Despite working in the field of bullying in the workplace for many years, I have yet to hear one voice raised in favour of a longer or more complicated policy document. In order to increase its accessibility it is generally considered helpful if the bullet points of the policy, written in plain English, can be encapsulated within a short leaflet. It is so easy to get swept away with legalese or jargon-like phrasing, yet the difficult and seemingly unglamorous task of simplifying and reducing wording makes so much difference to potential users.

There might need to be several iterations of this draft-test process before settling upon the final policy. Ah yes, the final policy. This is the point at which there is a temptation to pass around the champagne glasses and to place the new policy on the shelf with some ceremony. Unfortunately, this is a grave mistake, as if this happens the policy is likely to remain on the shelf gathering dust. If the policy really is to be effective there are a number of tasks left to do before the champagne corks can fly legitimately.

Most organisations recognise the need to communicate the policy. This requires time and effort, so some rely on osmosis, hoping that the news will somehow be absorbed into the collective consciousness. More pragmatic organisations may opt for proactive direct or indirect alternatives. The most obvious method of direct line communication is the e-mail to all employees, perhaps giving a link to the intra-net site of the new policy. One drawback to this approach is that the e-mail will have to compete with many others, and, let's face it, as an e-mail about policy is unlikely to capture the imagination there can be no certainty that the message will have got through to everybody. One form of indirect communication is cascading whereby the policy is communicated to one level or department within the organisation, say management or human resources, who are then tasked with passing it on. The success of this process obviously relies on the quality of the first communications and the commitment and endeavour of the intermediaries. It really is worth taking some time to work out how best to communicate policy initially, and then how to maintain awareness.

The organisation should now embark upon the vital stage of implementation. Hopefully the policy will have outlined the organisations initiatives in terms of prevention and interventions for bullying and harassment. This might have included policy advisers, mediators, champions, awareness raising / training etc. The policy should also have assigned responsibilities, together with names if appropriate, with regard to tackling bullying and harassment. This means that everyone should know what they should expect from others and what others should expect of them. All of this should have been put in place with the appropriate processes, management and individual support.

A word of caution is needed here about the way the policy is interpreted and applied. Policies generally make it perfectly clear that bullying and harassment are unacceptable. It might seem a mystery then why certain individuals are seen, or see themselves, as special cases. Irrespective of position, length of tenure, even the amount of business the individual brings into organisation, there can be no exceptions. If the policy is not applied consistently, fairly and evenly across the organisation it will fall into disrepute. There is a place here for the policy audit. Depending on the needs of the organisation, the audit can check that all departments / sites etc. are using

the same version of the policy, that employees are aware of the contents of the policy, that the processes are in place and work according to expectations, that the environment reflects the policy, that monitoring is being carried out etc. Smaller organisations might task management to carry out limited audits within their own or other departments.

Finally, a word on evaluation and review: it would be wonderful if there was no shelf-life for policies, but unfortunately there is. Even if there is no change in legislation that necessitates change, all policies should be subjected to periodic review, to check that they still meet the needs of the organisation. In terms of evaluation, the policy and the initiatives within the policy should be evaluated periodically to check whether they are still fit for purpose. Such evaluation might include delivery mechanism, changes in awareness, changes in behaviour, and value for money when compared to alternatives.

Right, if none of this comes as a surprise, and you can honestly claim that you have addressed all the issues raised in this document you really do have cause to celebrate.

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