REDEEMERS HEALTH VILLAGE

Human Resources Department

HARASSMENT AND BULLYING POLICY

Policy Code: HR-POL-021

Date of Issue:	June 6, 2025	**Next Review Date:**	April 28, 2027
Version:	1.2	**Last Review Date:**	April 28, 2026
Author:	Adedayo Bazunu, Acting Chief Human Resources Officer		
Directorate:	Human Resources Department		
Approved By:	Chief Executive Officer | REMCO, RHV Board		
Date Approved:	—		

Relevant Standards

- Labour Act of Nigeria (Cap L1 LFN 2004)
- ILO Convention No. 190 — Violence and Harassment in the World of Work
- RHV Disciplinary Action Policy (HR-POL-005)
- RHV Grievance Policy (HR-POL-016)
- RHV Code of Professional Conduct (HR-POL-023)

Amendment History

Issue	Status	Date	Reason for Change	Authorised
1	Draft	May 27, 2024	New Policy Implementation	
2	Final	June 2025	Policy Review & Update	CHRO
3	Final	April 28, 2026	Board Submission Revision	CHRO/CEO

1. Introduction

Redeemers Health Village (RHV) is committed to fostering a safe, respectful, and inclusive workplace where every employee, clinical and non-clinical is treated with dignity and professionalism. Harassment and bullying in any form are fundamentally incompatible with RHV's values and will not be tolerated under any circumstances, regardless of the seniority or role of the person responsible.

2. Purpose

This policy defines harassment and bullying, establishes clear and accessible reporting and investigation procedures, ensures that all employees understand their rights and responsibilities, and guarantees protection for those who raise concerns in good faith.

3. Scope

This policy applies to all employees (full-time, part-time, temporary, contract, and locum), volunteers, interns, students, and third-party contractors while engaged with RHV. It covers conduct occurring on RHV premises, at work-related events, and through digital communications including messaging applications, email, and social media used in a professional or work-related context.

4. Definitions

4.1 Harassment

Unwanted conduct, verbal, physical, or digital related to sex, race, ethnicity, disability, religion, age, sexual orientation, pregnancy, or any other personal characteristic, which has the purpose or effect of violating a person's dignity or of creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

4.2 Sexual Harassment

Unwanted conduct of a sexual nature, including: unsolicited sexual advances or propositions; requests or demands for sexual favours; sexually suggestive remarks, jokes, or gestures; unwanted physical contact of a sexual nature; sharing or displaying sexual content through any medium; or any other conduct of a sexual nature that is unwelcome and violates the recipient's dignity.

4.3 Bullying

Offensive, intimidating, malicious, or insulting behaviour; abuse of power through means that undermine, humiliate, denigrate, or injure the recipient whether physically, verbally, or through digital channels. Bullying may be persistent or may constitute a single severe incident. The use of managerial or professional authority to coerce, intimidate, or unfairly penalise a subordinate is a form of bullying.

5. Examples of Prohibited Conduct

The following are examples of conduct prohibited under this policy. This list is illustrative, not exhaustive:

- Verbal abuse, persistent criticism, offensive jokes, insults, mockery, or derogatory remarks directed at an individual
- Physical harassment, including unnecessary or unwanted physical contact, jostling, blocking, or physical assault
- Cyberbullying including through email, WhatsApp, social media, or any other digital platform
- Deliberate exclusion from team activities, meetings, professional opportunities, or social events on discriminatory or personal grounds
- Unreasonable or deliberately excessive allocation of workload designed to undermine, overwhelm, or humiliate an individual

- Persistent unwarranted criticism of an employee's work or character, particularly in public settings
- Sexual advances, overtures, requests, demands, or displays of a sexual nature that are unwelcome
- Threatening or intimidating behaviour, including implied threats to employment or professional standing
- Any conduct that a reasonable person would recognise as harassment or bullying in a professional healthcare context

6. Reporting Procedure

6.1 Informal Resolution

Where the affected employee feels comfortable and safe doing so, they may raise the matter informally — either directly with the person responsible or with their line manager. Informal resolution is appropriate for less serious, first-time incidents where the employee prefers a low-key approach. HR can assist with informal resolution at the employee's request.

6.2 Formal Complaint

Where informal resolution is not possible, appropriate, or has failed — or where the conduct is serious enough to warrant formal action — the employee submits a formal written complaint to the HR Department. The complaint should clearly set out: the specific nature of the conduct; the date(s), time(s), and location(s) of each incident; the names of any witnesses; and any supporting evidence available.

6.3 Confidentiality

All complaints are handled with strict confidentiality. Information about the complaint is shared only on a genuine need-to-know basis. Victimisation, retaliation, or adverse treatment of a complainant, witness, or any person involved in a harassment or bullying report is itself a serious disciplinary offence at RHV.

6.4 Anonymous Reporting

Employees may raise concerns about harassment or bullying anonymously through the RHV Whistleblowing channel (HR-POL-021). RHV will investigate all credible anonymous reports to the extent that the facts provided permit a proper investigation.

7. Investigation

1. HR acknowledges receipt of the formal complaint in writing within two (2) working days and confirms the name of the investigating officer and the anticipated investigation timeline.
2. A fair and impartial investigation is conducted by a designated HR officer with no prior involvement in the matter — or by an independent investigator where the circumstances require it.
3. The respondent is informed of the general nature of the complaint and given a full and fair opportunity to respond.
4. All relevant witnesses are interviewed separately and their accounts documented.
5. The investigation is ordinarily completed within fifteen (15) working days. Where exceptional complexity requires more time, both parties are notified in writing of the revised timeline.
6. On completion, both the complainant and the respondent are informed in writing of the investigation findings and the outcome.

8. Outcomes and Disciplinary Action

Where a complaint is substantiated — fully or partially — disciplinary action is taken against the respondent in accordance with the RHV Disciplinary Action Policy (HR-POL-003). The severity of the sanction reflects the gravity of the conduct, the respondent's position of responsibility, and any pattern of prior behaviour.

Sanctions range from a formal warning through to summary dismissal. Where the conduct involves a clinical professional, referral to the relevant professional regulatory body may also be made.

Where a complaint is not substantiated, the matter is closed and documented accordingly. Both parties are informed. No adverse record is placed on the file of the respondent where the complaint is not upheld.

Where a complaint is found to be knowingly false or made maliciously, the complainant may themselves face disciplinary action.

9. Support for Employees

- Employees who have experienced harassment or bullying may access confidential counselling and pastoral support through HR or the Employee Assistance Programme at any stage of the process.
- HR provides ongoing support and regular progress updates to the complainant throughout the investigation.
- Reasonable adjustments — such as temporary redeployment, change of working arrangements, or adjusted shift patterns — may be implemented as an interim protective measure during investigation, without this implying any finding against the respondent.

10. Roles and Responsibilities

Employees

Treat all colleagues with respect and dignity; report incidents of harassment or bullying without delay; cooperate fully with investigations; never retaliate against a reporter.

Managers and Heads of Department

Create and sustain a culture of respect and inclusion within their teams; take all complaints seriously and act promptly; never minimise, dismiss, or discourage reporting; escalate all formal complaints immediately to HR.

HR Department

Administer the reporting and investigation process; maintain confidential records; ensure all timelines are met; report anonymised trend data to the CHRO and Board.

CHRO

Oversees this policy; ensures the investigation process meets legal and institutional standards; reports on harassment and bullying trends to the Board's People & Remuneration Committee annually.

11. Monitoring and Review

The CHRO maintains a confidential register of all formal harassment and bullying complaints, their nature, and their outcomes. Anonymised trend data is presented to the Board annually. This policy is reviewed annually by the CHRO and updated to reflect any changes in Nigerian law, professional regulatory guidance, or organisational experience.