



What can the company do?

Have a company policy on harassment and bullying. The policy statement should:

- Contain a message from the Chief Executive or equivalent in the company;
- Set out the company's commitment to the elimination of harassment and bullying from on board ships and the goal of a working environment in which there is respect for the dignity and well-being of all seafarers;
- Identify a director or appropriate member of senior management in the company as the person with overall responsibility for the policy;
- Contain examples of the types of behaviour that may be classed as harassment and bullying
- Contain contact information to enable seafarers to report incidents.
- The company may wish to discuss the policy with employee representatives and/or seafarers' organisations to obtain their support and commitment.
- Once agreed, the company should ensure that all seafarers and relevant shore based personnel, are made aware of the policy and understand it.
- They should be presented with copies of documents containing the policy and a similar document should be displayed prominently on noticeboards on board ships and in shore-side offices.

Have complaints procedures. Companies should maintain fair procedures for dealing promptly with complaints from seafarers. Complaints of harassment and bullying can usually be dealt with using clear grievance and disciplinary procedures. Such procedures should:

- Provide for confidentiality;
- Provide safeguards against victimisation of the complainant;
- Provide safeguards for both the person making the complaint and the alleged perpetrator to be accompanied by a fellow employee or seafarer representative of their choice; and
- Ensure that the parties to the complaint are treated with equal dignity and fairness.
- It is important that seafarers are aware that complaints of bullying or harassment, or information from staff relating to such complaints, will be



dealt with fairly, confidentially, sensitively and expeditiously. Seafarers may be reluctant to come forward if they feel they:

- May be treated unsympathetically; or Are likely to be confronted aggressively by the person about whose behaviour they complain.

Harassment and bullying grievance procedure.

- The company should designate a person or persons to act as the first point of reference for each seafarer that wishes to make a complaint. This person could be a member of the ship's crew, a company employee based ashore, or a person designated by the company to act on its behalf.
- If the designated person is a company employee, that person should be given the authority to deal with the complaint, or to choose to refer it to a higher level in the company.
- As well as the **formal procedure**, the company should provide the victim of harassment or bullying with the option, at their discretion, of resolving their complaint **informally**. This could involve the victim explaining the effects of the alleged perpetrator's actions in the presence of another person from the company trained in resolution of complaints. The alleged perpetrator may then be offered an opportunity to apologise for their actions and undertake not to repeat them. A victim should never be made to face an alleged perpetrator if they do not wish to.
- The company may wish to:
- Consider using an independent third party based ashore to whom those suffering harassment or bullying might address their complaints; or
- Make its seafarers aware of confidential helplines provided by seafarers' organisations.
- A system whereby complaints are heard by others onboard may be effective on ships with large numbers of crew members and officers.
- Where a ship has a smaller crew complement, it may also be advisable for a point of contact ashore to be available to crew members for the reporting of incidents.

Responding to a complaint of bullying and/or harassment

Resolution of case/action

- Upon resolution, if the complaint is upheld, the company and seafarers' organisation should ensure that appropriate action is taken with regard to



handling the perpetrator of the harassment when taking remedial action and provision of necessary support to the victim.

- It would be inappropriate to respond by simply moving the victim to a different job or ship as a way of resolving a case of harassment or bullying.

Awareness-raising Activities. Companies and seafarers organisations may wish to:

- Arrange for seafarers to participate in educational programmes explaining the undesirable effects of harassment and bullying and setting out the company's policy;
- Use programmes to set out the mechanics of the company's procedures for the reporting of incidents;
- Consider provision of literature, posters and videos to underpin and reinforce corporate policies; or
- Notices on staff notice boards;
- A section in the staff handbook;
- Management guides;
- Seafarer guides;
- Articles in the staff/union magazines;

Example Company Policy on Harassment and Bullying.

- Company x will treat all complaints of harassment and bullying seriously and in strict confidence.
- Your senior officer on board and personnel manager ashore have been trained in dealing with complaints of harassment and bullying. You may approach either or both to report any incident you have suffered.
- The company considers any complaint of cyber bullying to be a serious issue.
- If you do not feel comfortable raising a complaint yourself, you may ask a friend or colleague to do so on your behalf. You will not be penalised by the company for making a complaint, provided it is not vexatious or made maliciously.
- Remember, it is the victim's perception of any actions that counts. If YOU feel you have suffered harassment or bullying, the company will look into the issue raised.
- Company Name: Contacts:



Suggested text of leaflet for seafarers

Obligations and responsibilities of seafarers

- No seafarers should be harassed or bullied on board ships. All seafarers have a responsibility for ensuring that their ship is free of harassment and bullying. Your company takes harassment and bullying very seriously.
- **Do you harass or bully other seafarers?**
- Harassment includes any act which creates feelings of unease, humiliation, embarrassment, intimidation, or discomfort to the person on the receiving end.
- Bullying may include any negative or hostile behaviour that makes a recipient feel intimidated. You may be unaware of the effect of your own actions on other seafarers and may need to modify your approach. Possible examples include:
 - Do you consider that your way of doing a job is always right?
 - Do you raise your voice at others?
 - Are you sarcastic or patronising to others?
 - Do you criticise individuals in front of others?
 - Do you criticise minor non-safety critical errors and fail to give credit for good work?
 - Do you shun any others or spread rumours or malicious gossip?
 - If you are concerned that aspects of your behaviour could be considered harassment or bullying, your company can help you to eradicate these aspects. However, you should approach your line manager and seek assistance – don't wait until a complaint is made against you!