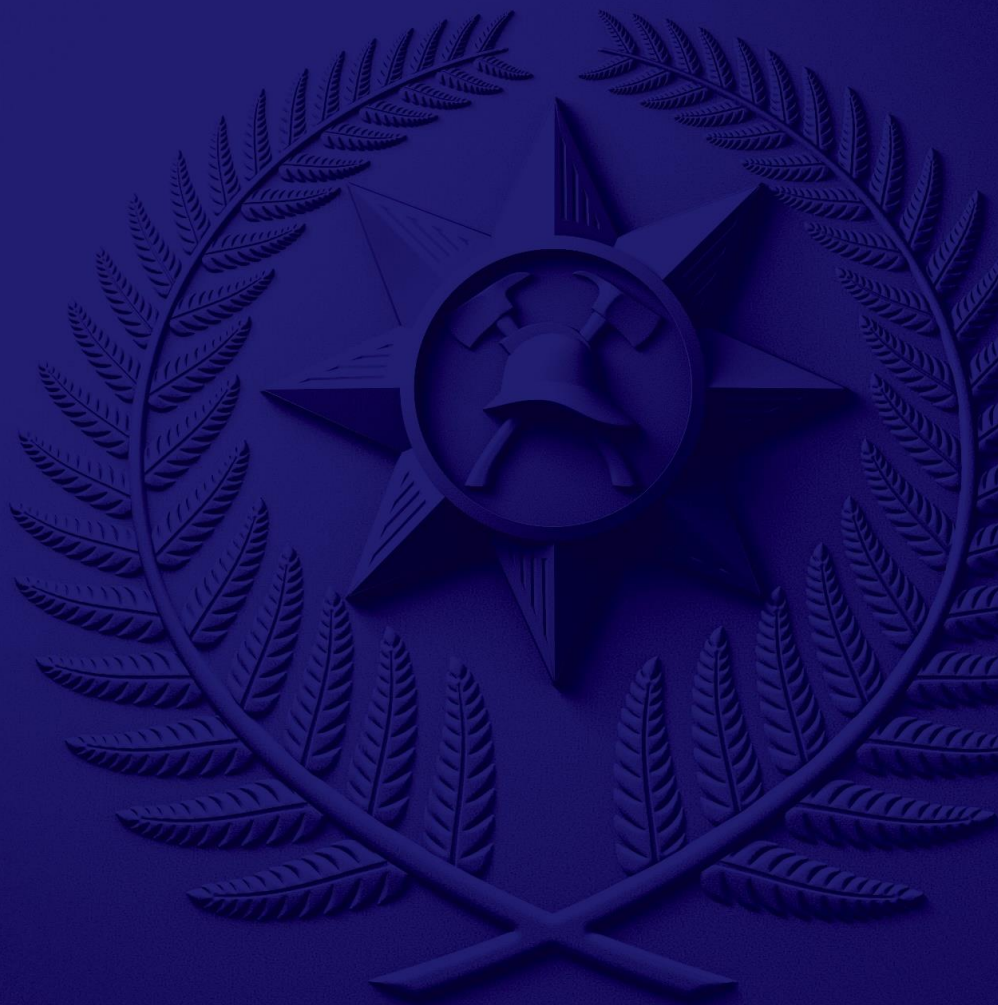




**FIRE**  
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NEW ZEALAND



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# The Behaviour and Conduct Office (BCO)

## Consultation proposal for the permanent scope and functions

## Table of contents

### Contents

Table of contents .....	2
Message from Rhys Jones, Chief Executive .....	3
Section 1 - Introduction .....	4
Section 2 - Background .....	6
Section 3 - Proposal .....	10
Section 4 - Implementation .....	18
Section 5 - Next steps .....	19
Section 6 - Support channels .....	20
Appendix 1: Independent review recommendations .....	21
Appendix 2: Proposed high level complaints process.....	22
Appendix 3: Proposed improvements .....	23

## Message from Rhys Jones, Chief Executive

Kia ora koutou

Fire and Emergency takes complaints of unwanted behaviour very seriously. Bullying and harassment of any kind does not support our values or expectations of our people.

We commissioned an independent review in 2018, a year after Fire and Emergency NZ was established, which in 2019 found that while the vast majority of our people act ethically and respectfully, unwanted behaviour has been a feature at all levels of our organisation.

Our Positive Workplace Culture Action Plan was initiated to address the 33 recommendations made by the independent review. Of these recommendations, all have either been implemented, or are in the process of being implemented.

Our values, launched in 2019, reflect what is important to our people and set out what we believe is core to who we are and the organisation we aspire to be. Our Code of Behaviour gives further meaning to our values by describing above the line (acceptable) and below the line (unacceptable) behaviour.

This along with our Policy to address bullying, harassment and victimisation is helping to make it clear that unacceptable or unwanted behaviour will not be tolerated, and provides all our people with the information they need to understand bullying, harassment and victimisation, how to prevent it, and how to report and resolve concerns.

An important part of the Independent Review was to have a clear and confidential complaints process. The Behaviour and Conduct Office is the internal mechanism for employees, volunteers, contractors and members of the public to seek information, get information about their options or raise a complaint.

Our current interim complaint process is managed by the BCO and Human Resources, supported by the relevant manager.

This proposal seeks feedback from all our people and their representatives on how a permanent Behaviour and Conduct Office with a self-contained team would be set up and what it would do.

We are working towards a strong values-based culture where we hold ourselves to account and call-out unwanted behaviour when we see it. A permanent BCO with its own dedicated employees would be accountable for managing, investigating and resolving all complaints of unwanted behaviour, together with proactive education and training.

We know changing behaviour will not happen overnight and it's up to all of us to help shift the dial. There will be external influences that will make it difficult for us to see the gains we are making. No matter what happens around us, we are proposing the BCO to be the fire break to effectively deal with unwanted behaviour, while focusing on prevention and education to help us build a strong culture where unwanted behaviour is stopped before it starts.

In presenting this proposal I would like to thank all our people for your continued support in building a Fire and Emergency where everyone is safe, welcome and included.

Noho ora mai rā

nā Rhys

## Section 1 - Introduction

### Wāhanga 1: Kupu Whakataki

This section provides an overview of the document and proposal for consultation.

#### What is the purpose of this document?

This document outlines a proposal for the permanent Behaviour and Conduct Office. It is open to all FENZ personnel and their representatives as an audience who, while not directly affected, may access or support the BCO in the future to provide feedback.

Those who would be directly affected are being consulted with around both this proposal, other relevant proposals and specific potential impacts to their roles.

This document is designed to help you understand the proposal, the rationale, and explains the process for providing feedback.

#### Timeframes for consultation

The indicative timeframe for the consultation period is 3 December 2020 to 5pm Friday 28 January 2021. Next steps are identified in [Section 5](#).

#### How should you use this document?

This document sets out the proposed changes and the consultation process. It can help you to understand the proposed changes and think about the feedback you might like to provide.

#### Details about the consultation process

All information about the proposal and the consultation process will be published on an online system called **ConsiderThis**. This is the same online tool we used for consultation on the proposals for our organisational structure and approach to rank. This system is open to all our people and their representatives as a mechanism for providing feedback on the proposal.

We believe using **ConsiderThis** will make the consultation process more transparent and encourage constructive discussions and feedback. This helps get the best information to make recommendations for final decisions.

Information about the proposal will also be available on the Fire and Emergency portal.

We will protect people's privacy, the identity of personnel providing feedback will not be visible to other people viewing **ConsiderThis** unless the individual makes reference to their identity in their feedback. In addition, individuals can choose to mark their feedback as private, which means it will not be published on **ConsiderThis**.

All feedback will go through a moderation process before being published on **ConsiderThis** to make sure feedback is respectful and does not contain inappropriate language. If through the moderation process it is felt that any feedback cannot be published, the individual providing the feedback will be asked to consider if they wish to change their feedback; if they do not wish to do this then the feedback will be collected but not published on **ConsiderThis** for everyone to see. Feedback cannot be edited or deleted by anyone other than the person providing it.

All comments will however be considered in the analysis of feedback, even if they are not published, e.g., if they have been marked as private or if they were not considered appropriate for publishing.

Once the feedback has been reviewed and considered, the Chief Executive will make decisions on whether or not to proceed with the proposal, as well as any changes. A document outlining decisions and the reasons for them will be communicated to affected individuals, the wider organisation and unions and associations.

## How you can submit your feedback on this proposal?

We encourage you to submit feedback on any aspect of the proposed changes, even if you may not be affected by them directly. All Fire and Emergency employees and volunteers may provide feedback on this proposal. Unions and Associations will be collating and submitting feedback on behalf of their members.

Your individual login details will be available as follows:

### Employees

All employees will receive an email to their Fire and Emergency NZ email address with login details to **ConsiderThis** on the day consultation commences. If you do not receive an email, please contact the BCO Project Team with your name and preferred contact email address by emailing [ConsiderThis@fireandemergency.nz](mailto:ConsiderThis@fireandemergency.nz)

Feedback can also be provided through your union or association.

### Volunteers

All volunteers with an active Fire and Emergency NZ email address or who have provided Fire and Emergency with a personal email address will receive an email with a login on the day consultation commences. If you do not receive an email, please contact the BCO Project Team with your name, preferred contact email address and your brigade by emailing: [ConsiderThis@fireandemergency.nz](mailto:ConsiderThis@fireandemergency.nz)

Feedback can also be provided through your association. If for any reason you cannot access **ConsiderThis**, you can request your Controller, Chief Fire Officer (CFO) or other leader to submit your feedback into **ConsiderThis** for you.

### Teams or groups

If a team or group wishes to provide feedback, one individual in the team or group will need to log in to **ConsiderThis** to record the feedback. It would be helpful if within the feedback the numbers and collective nature of the group are detailed, e.g., five individuals from a brigade.

## Section 2 - Background

### Wāhanga 2: He Whakamārama

Fire and Emergency New Zealand was formed in July 2017 and brought together 14,000 people across 40 different organisations, all with different cultures and ways of doing things.

A number of initiatives were undertaken to investigate ways of addressing concerns around behaviour and conduct:

1. Senior management visited Fire & Rescue New South Wales (FRNSW) in July 2017 which resulted in an investigation into the concept of an Office of Professional Standards (OPS).
2. In June 2018, an indicative business case was developed with the aim of establishing a Values, Ethics and Conduct Office (VECO) which was not pursued.
3. In July 2018 we commissioned retired Judge Coral Shaw to carry out an independent review into our workplace policies, practices and procedures to address bullying and harassment (Review).

[This Review](#) was our choice. It was our line in the sand – bullying and harassment have no place in Fire and Emergency.

### Independent review of our workplace policies, procedures and practices to address bullying and harassment

In January 2019 we [released the findings of the Review](#), and Chief Executive Rhys Jones publicly accepted all 33 recommendations from the review.

In summary, the Review found:

1. Bullying and harassment was a feature of Fire and Emergency at all levels and across all regions.
2. There were unacceptable levels of racism, sexism and discrimination towards particular groups of people.
3. People have a fear of speaking up – 53% of those who witnessed and/or experienced bullying or harassment did not report it.

In summary, the Review recommended:

- Leaders from all parts of the organisation must commit to addressing the issue of bullying and harassment, to adopt a zero-tolerance approach to such behaviour and aim to eliminate it from the organisation.
- Fire and Emergency acknowledge and systematically address the barriers to reporting bullying and harassment.
- Fire and Emergency develop and implement a system of capturing and recording all enquiries, complaints, grievances and/or disputes regarding bullying and harassment.
- Fire and Emergency must have clear values and develop a Code of Behaviour that all people accept and adhere to. These should both be incorporated into all aspects of Fire and Emergency life, so people are fully accountable.
- Policies, procedures and guidelines must give more detail around bullying and harassment to be fit for purpose.
- Education and training and the complaints process need to be addressed.



The Positive Workplace Culture Programme (PWC) was established to address the findings of the Review.

We're building a Fire and Emergency where everyone feels safe, welcome and included.

The Behaviour and Conduct Office would implement many of the recommendations<sup>1</sup> that came out of the Independent Review into bullying and harassment at Fire and Emergency. One of the recommendations that came out of the Independent Review was to improve the complaints process. A complaints process is a way for people to raise concerns about the way they have been or are being treated by other people in Fire and Emergency.

As a result, from June 2019 to Feb 2020, Fire and Emergency engaged Humankind, an external provider, to provide services to people raising a complaint of bullying or harassment or wishing to seek information from someone impartial and objective from the incident or issue while the Interim BCO was stood up.

In March 2020, the Interim Complaints process within the BCO was stood up to be the central point for receiving and recording complaints about bullying and harassment, providing oversight of the management of complaints of unwanted behaviour, and providing information on options while the permanent office and new function, complaints process and system were designed. The current Interim process and BCO supplements the current complaints process managed by Human Resources for resolving complaints providing an additional channel for people and a check and balance to enhance consistency.

A permanent BCO was unable to be set-up until some of the foundations for the BCO to operate effectively had been designed, tested and implemented including:

- Organisational values
- The code of behaviour
- The policy to address Bullying, Harassment and Victimisation

Other critical foundations also under development are:

- Standards of Conduct
- Policy to address Sexual Harm

### Tranche 3: People branch proposal

In September 2019 it was proposed that the BCO would report to a new Workplace Culture and Standards directorate in the People branch.

During consultation views were expressed that the BCO should be independent from the People branch and alternative suggestions were made for where it should [report](#). This was based on the need for perceived impartiality and objectivity. There were also contrasting views that the mechanisms and processes were set up correctly, and assurances could be provided regardless of where the office sat.

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<sup>1</sup> Refer to Appendix 1 for relevant recommendations

As a result, the decision was taken that the governance of the BCO be undertaken by the Positive Workplace Culture Panel while the design and development of the permanent BCO was underway at least during the first 18-month establishment period.

## Engagement on the design of the BCO

There has been a wide variety of engagement since April 2019 to understand the requirements of the BCO. This included:

- Meetings and workshops with an Internal Specialists Working Group
- Meetings and workshops with the Respect and Inclusion Taskforce
- Meetings and workshops with the Respect and Inclusion Taskforce Policies and Procedures subgroup
- Regional engagement sessions
- A National Hui
- Regional walkthroughs
- An online survey

## Online Survey

In June 2020 a survey was sent out to gather perspectives from our people on what would be important to them in a future BCO. These results supplemented feedback from regional engagement sessions, a National Hui and three regional workshops.

This feedback was not formal consultation which we are engaging in now but helped inform elements of the proposed BCO design.

We received 312 survey responses from across the organisation.

The following summarises the feedback:

- A clear preference for multiple communication channels to be available to contact the BCO
- A preference for a formal role rather than part-time regional representatives
- A clear preference for contacting the BCO directly, rather than via a regional representative
- A clear preference for the BCO to manage behaviour cases, rather than providing oversight only
- Independence (impartiality and objectivity), rather than accessibility, was seen as the most important attribute for the BCO



## Informing the Design

Getting the right design of the permanent BCO is important to us. There were a wide range of influences informing the proposed design of the BCO including:



## Engagement and Endorsement

It has taken time to investigate ways of addressing concerns around behaviour and conduct and then come up with the best way to build a BCO that works for all our people and our organisation.

The proposed design went through an engagement and/or endorsement approach including:

- Directional endorsement and guidance for the design approach and high-level design by the Positive Workplace Culture ELT Panel
- Engagement with HR Managers
- Engagement of the approach and proposed high-level design with the Internal Specialist Working Group (members from Human Resources and Health, Safety and Wellbeing) and the Respect and Inclusion Taskforce which includes representatives from all people networks (Women's Development, Pou Takawaenga Māori, Afi Pasefika and Rainbow Network) and Unions and Associations
- Endorsement of the final proposed design by the Positive Workplace Culture Executive Leadership Team Panel

## Section 3 - Proposal

### Wāhanga 3: Whakakaupapa

This section outlines the proposal for change

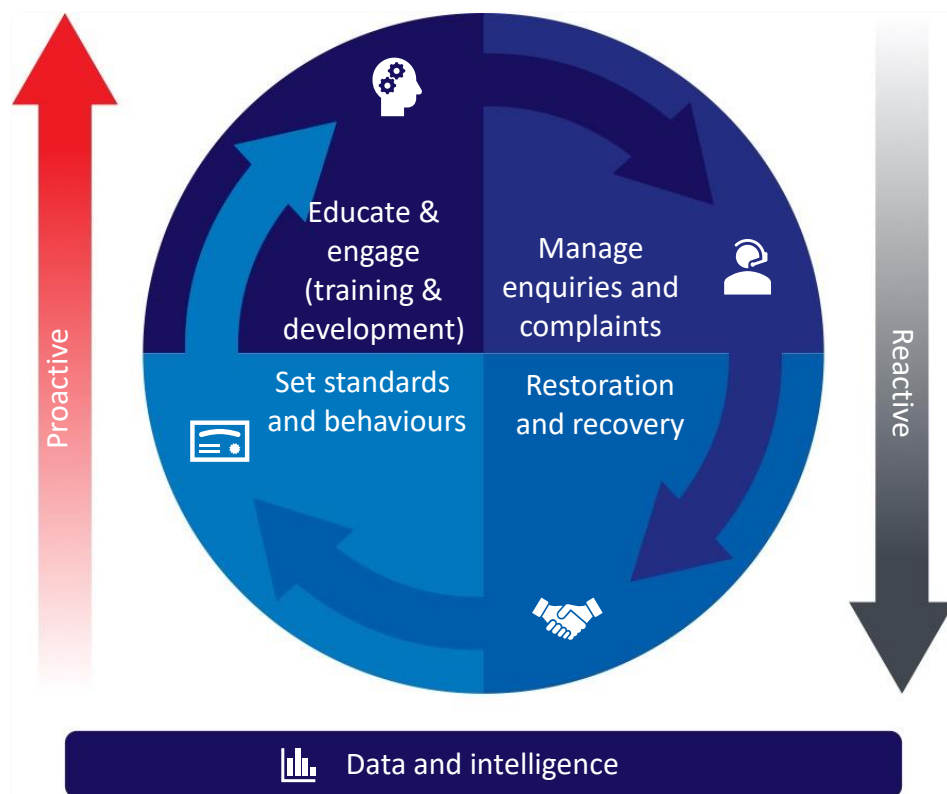
#### Proposed scope

A key part of the proposed change is deciding the scope of the BCO including:

1. Proposed functions
2. Managing enquiries and complaints - the proposed scope of one of the functions

#### 1. Proposed functions

There are five proposed functions as detailed in the graphic below:



These functions are partially being fulfilled currently:

1. Human Resources manages enquiries and complaints
2. The PWC programme is developing the foundation for setting standards and behaviours, educating and engaging and scoping a system to allow effective data and intelligence and proactive intervention
3. The Interim BCO is developing the foundations for restoration and recovery.

We propose that the BCO undertakes all five functions, proactively setting standards and providing education to prevent unwanted behaviour while reactively and effectively managing complaints to address unwanted behaviour and working with individuals to restore positive working relationships following a complaint.

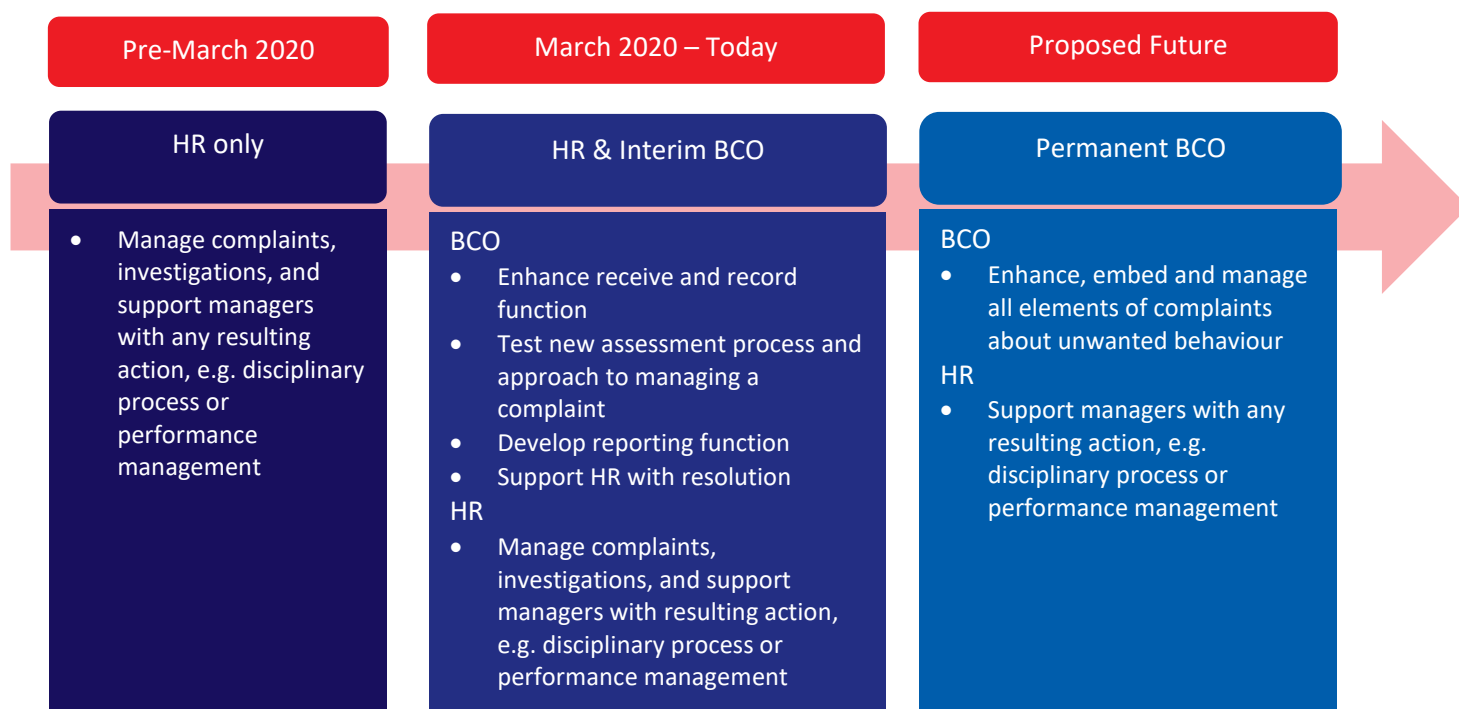
The BCO would become the centre of excellence for values-based behaviour. In order to achieve this, the five functions must work closely together to inform and enable each other. If one or more of these functions were taken outside the BCO, we believe it would be significantly more difficult to achieve the required change.

## 2. Managing enquiries and complaints

There are five key stages to the complaints process as detailed in the graphic below:



There has been increased focus on certain stages over time which is outlined below:



We propose the future BCO manages all stages of the complaints process dealing with unwanted behaviour with key improvements<sup>2</sup> in line with best practice.

We believe the benefit of this is that there would be end to end visibility of the process. It would ensure the required degree of objectivity and impartiality and provide dedicated resourcing and focus to the process.

The Interim BCO is focused on Bullying and Harassment complaints. These complaints are required to meet a certain threshold which is described in the [Policy to Address Bullying, Harassment and Victimisation](#).



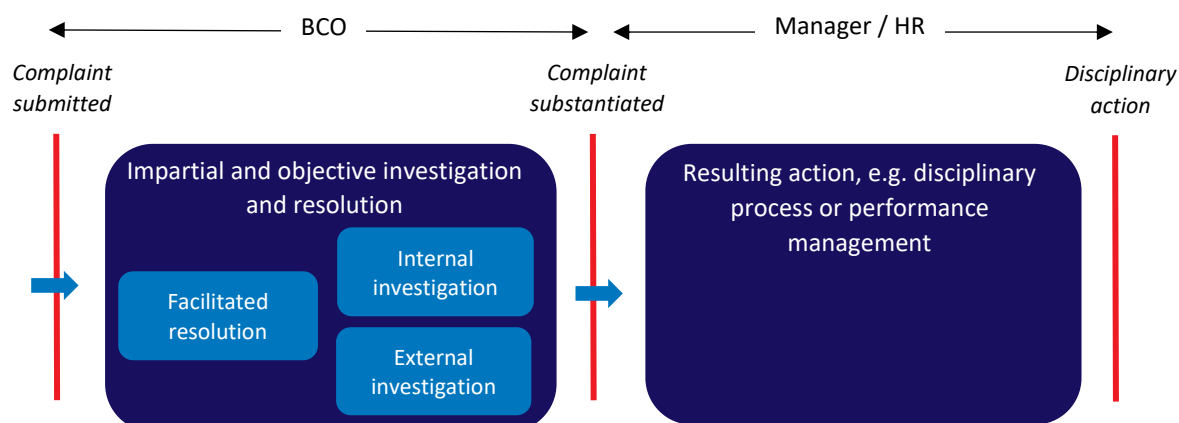
We propose that the scope of the BCO is widened to deal with all unwanted behaviour – i.e. behaviours that don't necessarily meet the bullying, harassment and victimisation threshold as well as those that do.

The reason for this is that having a threshold creates a barrier that may deter people from reporting unwanted behaviour if they cannot easily determine whether it meets the threshold or not. It could also be confusing as to where to report this behaviour. In addition, failing to address unwanted behaviours that don't meet the bullying and harassment threshold may result in more serious behaviour and causing more significant harm.

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<sup>2</sup> Refer to Appendix 3

The following graphic shows the proposed split of work between the BCO and HR teams



We propose that the scope of the Resolution stage is split with the BCO or external investigator conducting the investigation and the Manager (supported by HR in People branch) conducting the resulting action e.g. disciplinary process or performance management (if applicable).

We believe this would better enable complaints to be managed objectively and impartially, provide dedicated specialist resourcing and focus to the process, and release capacity within the HR team.

We anticipate that while the BCO would resolve the majority of complaints, there would be clear instances which would require appointment of an external investigator. The BCO would undertake a risk assessment to determine where this is required. For example:

- Sensitive allegations - e.g. sexual harm allegation
- Questions of credibility e.g.
  - When a serious allegation of inappropriate behaviour is made by a member of the public
  - When a serious allegation is made about a senior member of staff

We propose that external investigations into unwanted behaviour are overseen and coordinated by the BCO.

The centralised and consistent approach to managing complaints would ensure that internal and external investigations had the necessary coordination, monitoring and oversight.

The proposed permanent Behaviour and Conduct Office would be the internal mechanism for providing support and resolving complaints about unwanted behaviour. All personnel and the public could get advice or raise a complaint via the BCO. We are currently identifying the different

pathways available to personnel who are not satisfied with the decision made on their complaint or the process followed by the BCO.

## Reporting line

As outlined in the Tranche 3 People branch decisions document, the permanent BCO would continue to report to the PWC ELT Panel for a period of 18 months from the date it was established.

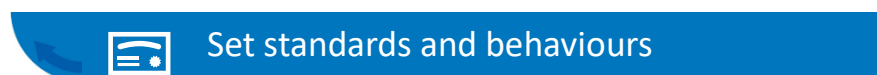
Over time we expect that proactive work (such as leadership training) would reduce the emphasis on the complaints side of the BCO. With natural alignment with the proactive functions of the proposed BCO with other teams in the People branch it could make sense for the BCO to report there at an appropriate time.

## Proposed design

### BCO Management

We believe this function should be high profile and relatively autonomous based on our experience with the current BCO. Based on this we propose a permanent BCO Director is established to lead and provide oversight of the multiple functions of the BCO. The role would be responsible for activities such as building awareness of the BCO and ensuring its services are trusted, building and maintaining internal and external networks and representing the BCO as required for high profile enquiries or events.

To achieve this, we propose that the manager role is included in the team to support the proposed Director in managing the day to day operational activity of the BCO. This role would ensure the management and resolution of complaints, and restoration and recovery activities are appropriately resourced, operating within agreed service levels and budgets, and ensure risks and issues are properly managed and reported/escalated.



The proposed Director would take the lead on this with the engage and educate team supporting including a part/shared resource reviewing and maintaining the various policies, processes, procedures and standards that for which the permanent BCO would be responsible.

The focus of this area would be setting professional standards and behaviours in the workforce and raising awareness of the BCO and supporting tools.



## Educate & engage (training & development)

The Positive Workplace Culture Programme is developing the following Initiatives which in future will need to be supported as well as additional needs identified.

The focus of this team would be to provide training and education to support the identification and management of inappropriate behaviour. This team would comprise specialist learning and development capability and lead the embedding of organisational values and enable and support development of leadership capability. This includes:

- The code of behaviour
- The standards of conduct
- The policy to address Bullying, Harassment and Victimisation
- The policy to address Sexual Harm
- Delivery of Respect Training, Crew Conversations Training and Inclusive Leadership training

This area would provide resource and focus to address Recommendations<sup>3</sup> 16, 17, 21 and 31.

Many of the needs are not fully understood at this stage. For this reason, we propose that a small team be initially established to deliver this function, and at the same time develop organisational knowledge and networks and scope and manage the various options to meet the need which could be developed and delivered in-house, outsourced or via a mixed model.



## Manage enquiries and complaints

We propose that a moderate sized team is responsible for all elements of complaint management with three specific separate focuses.

1. Complaint management to provide information for enquiries and then facilitating and monitoring the complaint process.
2. Provide facilitation and mediation support to resolve enquiries informally (i.e. without an investigation and a potential disciplinary outcome)
3. Provide investigation services where a formal resolution is required. As stated above at times this would be outsourced to an external investigator. If the substance of the complaint was established, then this would be handed over to the Manager (with the support of HR in People branch) to take resulting action, e.g. disciplinary process or performance management

We propose creating a Principal role that would focus on informal and formal resolution. This would allow the development of best practice, support and guidance for less senior practitioners and an internal resource for complex complaints where appropriate. All roles would have specialist skills in their area of expertise.

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<sup>3</sup> Refer to Appendix 1





## Restoration and recovery

The informal resolution resources would be able to provide restorative facilitation at the end of a process and recovery services would be offered via the complaint management resources. Restorative facilitation is about working with all parties to repair relationships to enable them to move forward while recovery services are additional support to help individuals to recover from the incident.



## Data and intelligence

We propose that with minimal data initially a part/shared resource is established to provide analytical support to the BCO (and where there are potential synergies more broadly).

The focus of this role would be data capture and analysis to inform early intervention, training and education as well as system wide learning to enable continuous improvement.

This area would provide resource and focus to address Recommendation 18<sup>4</sup>

### Location

We propose that although the team would have a centralised reporting-line they would be geographically dispersed to provide a presence across the country as well as flexibility and access.

### Proposed interactions

The proposed permanent BCO would operate within the broader organisational context therefore there we expect of close working relationships with key functions and teams.

<b>Human Resources (People Experience directorate)</b>	Human Resources would work closely with Managers to provide support and identify enquiries which may need to be raised via the BCO. They would support the Manager with any action resulting from an investigation.
<b>Employee Relations (Workplace Culture and Change directorate)</b>	We expect that the BCO specialists would have an oversight relationship with the Employee Relations team to ensure consistency around outcomes
<b>Safety, Health and Wellbeing (People Experience directorate)</b>	If a potential complaint or risk was raised via Safety, Health and Wellbeing, we propose the Safety Health and Wellbeing Advisor would continue to provide support to people affected by unwanted behaviour, or those affected, including the person accused, through Fire and Emergency's support channels. Any complaints would be sent to the BCO. There may be some policy, process or system changes required to support this.

<sup>4</sup> Refer to Appendix 1

Recommendation 21 specified that the roles of the Human Resources team, the Employment Relations team and the Safety, Health and Wellbeing team in managing enquiries and complaints of bullying and harassment are reviewed and rationalised. We believe that the above role clarity, having a centralised system for receiving and managing complaints, and work to successfully embed the new model would address this recommendation.

<b>Unions and Associations</b>	Unions and Associations would continue to represent their members through support and advocacy throughout the process.
<b>Workforce Capability (People and Workforce Capability directorate)</b>	The proposed BCO 'engage and educate team' would have a close working relationship with key areas of this directorate to ensure learning needs are scoped with a full view of other activity planned and that there is alignment or combined development or leveraging resourcing across the business.
<b>People Networks</b>	With a small centralised function proposed networks <sup>5</sup> would be key in raising the profile of the BCO, providing support, guiding people to the process and raising any general issues they are seeing that could be addressed by the BCO.

<sup>5</sup> For example, WFENZ, Afi Pasefika, Pou Takawaenga and the Rainbow Network.

## Section 4 - Implementation

### Wāhanga 4: Te Whakatinanatanga

This section describes the proposed approach to implementing the BCO once decisions have been made following consultation.

Following consultation, and if the decision is made to proceed with some or all of the proposal set out in this document, careful consideration would be given to how and when transition to any new structures and working arrangements.

Potential stand up would largely depend on appointments to new positions, many of which may not occur until the first half of 2021. A key additional consideration is the reduction in levy brought about as a result of the economic impact of Covid-19 on businesses and the commercial sector. That will likely require us to approach implementation over time in a phased way which would require us to operate a hybrid model in-between the current and new models for a period.

In addition, we would be mindful of those who could be recruited into the new organisational structure – lengthy transition delays may have a disruptive impact.

If you have any suggestions or ideas about the process and timing of implementing the new function if this proposal goes ahead, please provide them in your feedback.

## Section 5 - Next steps

Wāhanga 5: Ngā Mahi Whai Muri

This section describes what will happen following the end of the consultation period

### Decisions announcement

Decisions on whether or not to proceed with the proposed changes will not be made until all feedback on the proposal has been considered. Following consultation, feedback will be themed and provided to the Positive Workplace Culture ELT Panel for consideration with decisions made around any changes to all or part of the proposal. A summary of feedback will be provided as part of the decision document with relevant responses.

We want to ensure that our people feel well supported throughout this process and that legal and contractual obligations are faithfully observed.

## Section 6 - Support channels

If you are feeling unsafe or have experienced unwanted behaviour you can contact the BCO for confidential information and advice about options, reporting, and support:

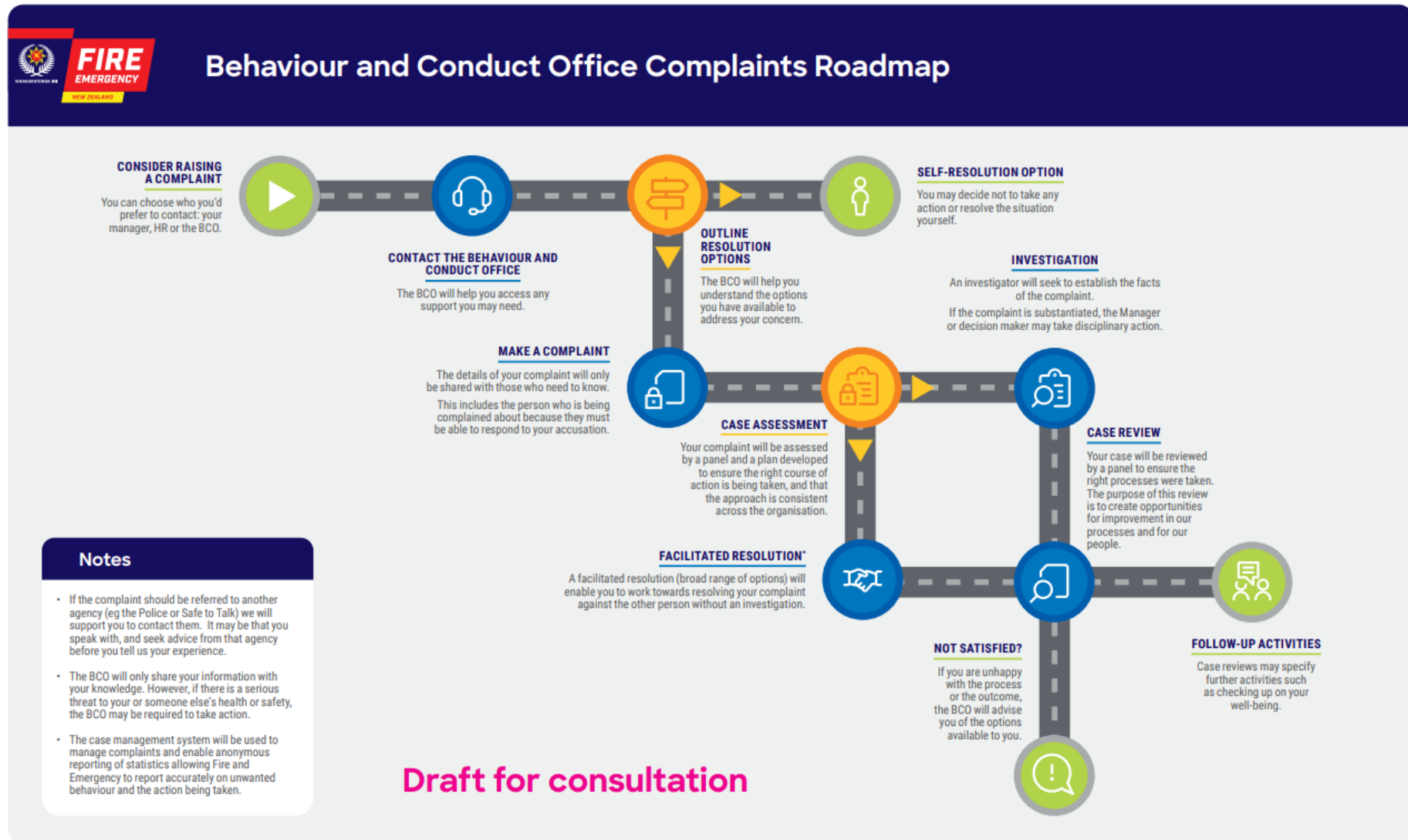
- Phoning 0800 470 951 (available Monday to Friday, 9am-5pm)
- Emailing [bco@fireandemergency.nz](mailto:bco@fireandemergency.nz)
- Completing this [Behaviour and Conduct Office Complaints and enquiry form](#) and emailing it to [bco@fireandemergency.nz](mailto:bco@fireandemergency.nz)

## Appendix 1: Independent review recommendations

The proposed BCO design would enable the following recommendations to be addressed:

#	Independent review recommendations
4	FENZ acknowledges and systematically addresses the barriers to reporting bullying and harassment
5	FENZ procedures are extended to ensure that the content and scope of their coverage are comprehensive and in line with state sector and WorkSafe guidelines and best practice.
6	FENZ creates an integrated framework for addressing bullying and harassment as a significant health and safety risk in FENZ
7	FENZ develops tools to identify, eliminate or minimise the risks to mental health and wellbeing caused by bullying and harassment
9	The work undertaken to address bullying and harassment is subject to regular monitoring and review of the effectiveness of the actions and controls, including at a governance level and with the engagement of all unions and associations
12	Once the review has been completed and a more coherent system of bullying and harassment policies and procedures is put in place, the template forms are amended to reflect the suggested processes and FENZ values, to ensure consistency in approach and consistency in the message received from FENZ management
13	If the 'How Do I' guides remain in use, they need to be updated to ensure they are comprehensive to enable the reader to be fully informed about the options open to them, and that any relevant information is readily accessible when the relevant 'How Do I' guide is consulted
14	A common set of procedures and practices for receiving and managing complaints of bullying and harassment is formulated and implemented without delay
15	The practices and procedures for receiving and managing complaints of bullying and harassment include deadlines by which both targets and accused are regularly advised of the progress of the complaint and the outcome of any investigation.
16	All persons who are charged with receiving and resolving complaints of bullying and harassment receive adequate education and training in the definition and awareness of the dynamics that drive and support this behaviour
17	All persons who have responsibility for receiving and resolving complaints of bullying and harassment receive adequate education or training in the delivery of the new procedures and practices.
18	FENZ provides adequate resources and support to collect and manage all data relating to bullying and harassment
19	FENZ develops and implements a system of capturing and recording all issues, complaints, grievances and/or disputes regarding bullying and harassment.
21	Roles of the Human Resources team, the Employment Relations team and the Safety, Health and Wellbeing team in managing issues and complaints of bullying and harassment are reviewed and rationalised in the light of the other recommendations this report
28	The performance requirements of the system for dealing with bullying and harassment is formulated and implemented after full engagement with workers and unions and associations
32	FENZ develops and implements a complaints process for issues of bullying and harassment
33	It is recommended that all the recommendations in this report that are accepted and implemented by FENZ are regularly monitored and evaluated over a period of 36 months

## Appendix 2: Proposed high level complaints process





## Appendix 3: Proposed improvements

Below are the key improvements we believe the new model would provide:

### Case Assessment Process

This process means that using a variety of experience and expertise to initially review complaints to drive impartiality and consistency and minimise any bias or conflicts of interest from entering the decision-making process.

### Approach Plans

As a result of the Case Assessment process the approach plan would clearly document roles the approach to managing the complaint, with timeframes and objectives. The BCO would monitor these timeframes and be able to provide updates.

### Structured Approach to Informal Resolution

With a structured approach to informal resolution and a range of options, education could be provided, and expectations set early in the process around the benefits, limitations and suitability of an informal approach.

### Case Reviews

Cases would be reviewed prior to being closed to ensure consistency of approach, learn lessons, share information and refine approaches.

### Post-resolution follow-up actions

There would be more of a focus on actions after resolution (if required) like restorative facilitation (to ensure the workplace can start to work together effectively again), education and training, additional support for participants in the process. This would help to restore relationships, and avoid victimisation or retribution. In addition, participants would be asked for their reviews on the process to help continuous improvement.

### Ability for the BCO to raise cases and take action

The BCO would take a proactive approach using information from trends and anecdotal information from networks or partners.

### Specialised resourcing

There would be resources specialised in facilitated resolution and others in investigations each with a Principal role focused on ensuring best practice is embedded in each discipline with the Principal Investigations Specialist coordinating any external investigations required. This would ensure consistency and robustness of practice.