



## **NATIONAL RIFLE ASSOCIATION**

## **BULLYING AND HARASSMENT POLICY**

**Adopted by Council on 19 August 2022**

## 1. Introduction and scope

1.1 The National Rifle Association (“**NRA**”) is committed to the principle that all those who come into contact with its activities and its members are treated with dignity and respect and treat others in the same way. The NRA seeks to ensure that the environment within which its activities take place is comfortable for all. This policy therefore covers bullying and harassment that occurs:

1.1.1 on any NRA property; and

1.1.2 outside of NRA property in any context where any event or activity is being organised with the support and approval, and under the rules, of the NRA and, in particular, the NRA Handbook, and where NRA members or members of Affiliated Bodies (as defined below) compete in events organised by any other body at any place, including any travel required to and from such places<sup>1</sup>.

1.2 This policy applies to:

1.2.1 any club, association, or other body affiliated to or under the control or direction of the NRA (“**Affiliated Body**”) and any member, trustee, director, manager, chairman, secretary, committee member or other officer of that Affiliated Body and any person purporting to act in any such capacity<sup>2</sup>;

1.2.2 any person who holds an NRA membership card, Shooter Certification Card, Range Conducting Officer card, Ranger Safety Officer card and any other card or credential issued to that person by the NRA (“**Credential**”), or any person purporting to hold such a Credential; and

1.2.3 any person at any event at any place conducted with the support and approval, and under the rules, of the NRA and, in particular, the NRA Handbook.

1.3 This policy does not apply to employees, as the Employee Handbook sets out the NRA’s Harassment and Bullying policy specifically in relation to employees. This policy, and the Employee Handbook more generally, should be referred to if employees experience or wish to report any incident of bullying or harassment. Instances of bullying or harassment by employees may still be the subject of a complaint in accordance with section 4 below but will be dealt with under the Employee Handbook. However, all NRA staff, including agency workers,

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<sup>1</sup> Please note, in this regard, that the exclusion contained in clause 1.4.5 of the Complaints Procedure does not apply to allegations of bullying and/or harassment at competitions organised by the NRA.

<sup>2</sup> Please note, in this regard, that the exclusion contained in clause 1.4.3 of the Complaints Procedure does not apply to allegations of bullying and/or harassment about Affiliated Bodies if you are dissatisfied with any action(s) an Affiliated Body has or has not taken in relation to an allegation you have made of bullying and/or harassment.

apprentices, consultants, contractors, directors, employees, interns, temporary workers and volunteers must familiarise themselves with this policy.

1.4 This policy is available on the NRA's website. Everyone to whom it applies has an individual responsibility to comply with both the spirit and the wording of the policy.

1.5 This policy should be read in conjunction with the NRA Handbook; Complaints Procedure; and Disciplinary Code.

## **2. What is harassment?**

2.1 The NRA's policy is that the harassment of any person is unacceptable behaviour.

2.2 Harassment may take a number of forms (including bullying), occurs on a variety of different grounds and can be directed at one person or a number of people. Harassment need not be directed at the complainant and can occur if the complainant witnesses another person being harassed.

2.3 Harassment involves subjecting an individual to unwanted behaviour which has the purpose or effect of:

2.3.1 violating the victim's dignity; or

2.3.2 creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.

2.4 Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or the effect referred to in paragraph 2.3 above. An individual of any gender may be the victim of sexual harassment.

2.5 A person will also commit harassment if they (or anyone else) engage in unwanted behaviour (of a sexual nature or otherwise) that has the purpose or the effect referred to in paragraph 2.3 above and the victim either rejects or submits to it and, because of that rejection or submission, that person treats the victim less favourably.

2.6 Harassment usually arises because the perpetrator continues the behaviour even after it has been made clear that it is regarded by the recipient as offensive or unwanted. However, a single incident may amount to harassment if it is sufficiently serious.

2.7 The unwanted nature of the behaviour distinguishes harassment from friendly behaviour that is welcome and mutual. Everyone must always consider whether their words or behaviour may be considered offensive and if in any doubt refrain from the behaviour.

- 2.8 Harassment can occur whether or not it is intended to be offensive, as it is the effect on the victim which is important, not whether or not the perpetrator intended to harass them. Harassment or bullying is unacceptable even if it is unintentional.
- 2.9 Harassment may relate to:
- 2.9.1 age;
  - 2.9.2 disability (past or present);
  - 2.9.3 gender reassignment;
  - 2.9.4 race, colour, nationality, ethnic or national origins;
  - 2.9.5 religion or belief;
  - 2.9.6 sex;
  - 2.9.7 sexual orientation;
  - 2.9.8 power or hierarchy; and/or
  - 2.9.9 willingness to challenge harassment (leading to victimisation).
- 2.10 The phrase 'relate to' is very wide and therefore covers:
- 2.10.1 harassment based on a perception of another person, for example that the person is gay, or is disabled, whether or not this perception is correct and even if the perpetrator knows that their perception is, in fact, wrong; and
  - 2.10.2 harassment that occurs because someone is associated with another person, for example, someone who is harassed because they care for a disabled person, or who is harassed because they are friends with a transgender person, or a white competitor who sees a black competitor being subjected to racially abusive language which also causes an offensive environment for them.
- 2.11 While not an exhaustive list, forms of harassment include:
- 2.11.1 physical contact;
  - 2.11.2 'jokes', 'banter' and mimicry;
  - 2.11.3 offensive language, shouting or behaving in an intimidating manner;
  - 2.11.4 gossip;
  - 2.11.5 slander;

- 2.11.6 offensive, insensitive or sectarian songs or messages (including email);
  - 2.11.7 displaying posters or pictures, graffiti, emblems, flags;
  - 2.11.8 obscene or offensive gestures;
  - 2.11.9 offensive emails and screen savers etc.;
  - 2.11.10 isolation or non-cooperation and exclusion;
  - 2.11.11 coercion for sexual favours or sexually suggestive remarks;
  - 2.11.12 pressure to participate in political/religious groups;
  - 2.11.13 intrusion by pestering, spying and stalking;
  - 2.11.14 continued requests for social activities after it has been made clear that such suggestions are not welcome; and
  - 2.11.15 verbal, non-verbal or physical conduct of a sexual nature.
- 2.12 Harassment is unlawful in many cases and individuals may be held personally liable for their actions. In some cases their behaviour may also amount to a criminal offence.

### **3. What is bullying?**

- 3.1 The NRA's policy is that the bullying of any person is unacceptable behaviour.
- 3.2 Bullying may be described as behaviour (from a person or a group) that is unwanted and makes the recipient feel frightened, less respected or put down, made fun of or upset. Bullying may be physical, verbal or non-verbal.
- 3.3 Behaviour that is considered firm coaching by one person may be considered bullying by another. Most people will agree on extreme cases of bullying and harassment but it is sometimes the 'grey' areas that cause the most problems. The NRA considers that unacceptable behaviour includes (this is not an exhaustive list):
  - 3.3.1 spreading false rumours, or insulting someone (particularly because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, or sexual orientation);
  - 3.3.2 putting someone down in front of others;
  - 3.3.3 copying critical notes about someone to others who do not need to know;
  - 3.3.4 ridiculing or demeaning someone, picking on them or setting them up to fail;

- 3.3.5 deliberately excluding someone from communications without good reason;
  - 3.3.6 excluding someone from social events;
  - 3.3.7 unfair treatment, e.g. not allowing one member as long on the firing range as another;
  - 3.3.8 overbearing or intimidating supervision or other misuse of power or position;
  - 3.3.9 'upward bullying', e.g. a more junior member of a shooting team overruling a person's authority, showing continued disrespect, spreading rumours or doing things to make the person seem unskilled or unable to undertake their responsibilities properly.
- 3.4 Legitimate, reasonable and constructive feedback to another person where such feedback is appropriate, or reasonable instructions given to a person where the instructing person has authority to do so will not, on their own, amount to bullying.

#### **4. How do I complain?**

- 4.1 Complaints of harassment and/or bullying must be made under the Complaints Procedure.
- 4.2 We take harassment and bullying seriously. A breach of or failure to follow any element of this policy constitutes a breach of Section 22, Paragraph 73 of the NRA Handbook and may be dealt with by the NRA under the Disciplinary Code. Any person subject to the Disciplinary Code found to be in breach of this policy will be liable to disciplinary action thereunder, which could result in sanctions including a fine and/or expulsion from the membership of the NRA.
- 4.3 For all those to whom the Disciplinary Code does not apply, a breach of this policy may result in:
  - 4.3.1 exclusion from Bisley Camp; and/or
  - 4.3.2 exclusion from competition at any event at any place conducted with the support and approval, and under the rules, of the NRA and, in particular, the NRA Handbook, in each case either permanently or for such a period as the Secretary General and the Chairman of the Disciplinary Body thinks fit.
- 4.4 Anyone who feels they have been subject to harassment and/or bullying should not hesitate in using the Complaints Procedure, and they should not fear victimisation. Retaliation against someone who brings a complaint of harassment and/or bullying is a serious matter and will also be considered a breach of this policy.

4.5 The Complaints Manager can provide, in confidence, support and assistance to any person subjected to harassment and/or bullying and assist in the resolution of any problems, whether through informal or formal means under the Complaints Procedure. If you are in any doubt as to whether an incident or series of incidents that has or have occurred constitute harassment and/or bullying, then in the first instance you may wish to approach The Complaints Manager on an informal confidential basis. They will be able to support you in assessing whether the complaint necessitates further action under the Complaints Procedure.

**5. Review**

5.1 This policy will be reviewed and revised as required in response to updated legislation and guidance and lessons learnt from any complaints in relation to this policy.