

Equal opportunities: Anti-bullying and Harassment policy (For staff and students)

Policy Owner(s)	HR Manager and Quality Teaching and Learning Manager
Policy Approver	Executive Team
Related Policies	Disciplinary, Equal Opportunity ESO Grievance Procedure or the Student Complaints Procedure. Student Code of Conduct, Disciplinary Procedure or the Fitness to Practise procedure
Storage Location	ESO Learning Zone
Effective Date	March 2015
Next Review	March 2017

Scope of this policy

This policy relates to all employees and students of the European School of Osteopathy (ESO). The ESO has a firm commitment to equality of opportunity and as such will not tolerate the harassment or bullying of one member of its community by another.

The aim of this policy is to assist in developing an environment conducive to working and studying in which harassment & bullying are known to be unacceptable and where individuals have the confidence to report an incident should it arise, in the knowledge that their concerns will be dealt with appropriately and fairly. The policy outlines procedures to be followed if an employee or student feels they are being harassed or bullied in the course of their work/study or as a result of their employment by the ESO.

Any employee or student who is found to have harassed or bullied a colleague will be subject to disciplinary action, up to and including summary dismissal or expulsion from the course.

1 The ESO's commitment

1.1 The ESO welcomes diversity and believes that every student and employee has a right to study and work in an environment which encourages harmonious relationships. The ESO is committed to preventing harassment & bullying and it is the responsibility of all stakeholders to be aware of and understand the context of the ESO's Harassment & Bullying Policy.

1.2 Every employee and student of the ESO should aim to promote an environment free of harassment and bullying. They should take immediate action if harassment and/or bullying is suspected or identified, whether or not a complaint had been made. Allegations of harassment and bullying received either formally or informally through this policy will be taken seriously and dealt with promptly and sensitively.

1.3 In addition to its commitment to equal opportunity the ESO has a legal obligation to ensure that harassment on the grounds of race, sex, disability, sexual orientation, gender reassignment, religion or belief, age, pregnancy or maternity, marital or civil partnership status or harassment on any other grounds, does not take place, as this is discrimination. In addition, the ESO has a duty of care towards its staff under the Health and Safety at work Act 1974 and a duty of care towards its students.

1.4 Every student and member of staff is also personally liable under the protection from Harassment Act 1997 and the Equality Act 2010 legislation. Allegations of harassment & bullying will be treated very seriously and could result in disciplinary action being taken against the perpetrator.

The ESO will ensure that no member of staff or student raising a concern under this policy is victimised as a result.

1.5 As allegations of harassment & bullying are very serious. The ESO will treat very seriously any such allegations proven to be malicious and these are also likely to be the subject of disciplinary action.

2 What is harassment and bullying?

2.1 Harassment is unwanted conduct which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment, and in the perception of the recipient of the conduct, it should reasonably be considered as having that purpose or effect.

Harassment & bullying can take a variety of different forms ranging from repeatedly ignoring a colleague or subjecting them to unwelcome attention, to intimidation, humiliation, ridicule or offence. More extreme forms of harassment & bullying include physical threats or violence. Harassment & bullying may consist of a single incident or a series of incidents. Behaviour that may appear trivial as a single incident, can constitute harassment or bullying when repeated, or in the context of the staff/student or manager/employee relationship. Harassment & bullying behaviour may not always be intentional, but is always unacceptable, whether intentional or not.

The ESO has a responsibility to protect its staff and students from harassment and bullying by other members of the ESO Community, on ESO premises and off-site at

school-related events (e.g. at conferences, departmental social events with colleagues, or through deliberate exclusion from an event).

It is not always necessary for the perpetrator to be in the same room for harassment to take place. The potential for harassment or bullying by telephone and letter has now expanded to include so-called 'cyber-bullying' by, e.g. emails, text messages and material posted on web sites, including personal blogs or social networking sites.

Some of the most prevalent forms of harassment & bullying include the following:

- Sexual harassment can take the form of ridicule, sexually provocative remarks or jokes, offensive comments about dress or appearance, the display or distribution of sexually explicit material, unwelcome sexual advances or physical contact, demands for sexual favours or assault.
- Racial harassment is usually although not exclusively directed at people from ethnic minorities. It may include jokes about, or gratuitous references to a person's colour, race, religion, nationality. It can also include offensive remarks about dress, culture, or customs which have the effect of ridiculing or undermining an individual or fostering hatred and/or prejudice towards individuals or particular groups.
- Harassment of disabled people can take the form of individuals being ignored, disparaged or ridiculed because of mistaken assumptions about their capabilities. Their impairment/disability rather than their ability can become the focus of attention and harassment can include inappropriate personal remarks, jokes or inappropriate reference to an individual's appearance.
- Harassment on the grounds of a person's sexual orientation may be aimed at heterosexual people but is more usually experienced by gay men and lesbians, bisexual men and women. Examples of harassment relating to sexual orientation are homophobic remarks or jokes, offensive comments relating to a person's sexual orientation, threats to disclose a person's sexual orientation to others or offensive behaviour/abuse relating to HIV or AIDS status. The European Commission code of practice on sexual harassment points out that lesbians and gay men often encounter disproportionate levels of harassment relating to their sexual orientation. The response of lesbians and gay men to harassment may also be complicated by the fact that in order to complain about it or confront it, they may have to be open about their sexual orientation with work colleagues (perhaps for the first time).
- Harassment on the grounds of gender identity may be aimed at transgender people, or people who have undergone, are undergoing, or intend to undergo

gender reassignment. It is recognised that this is a separate issue unrelated to sexual orientation.

- Bullying is the exercise of power over another person through negative acts or behaviours that undermine him/her personally and/or professionally. Power encompasses personal strength, or power to coerce others through fear or intimidation, which is not always synonymous with status. Bullying can be threatening, insulting, abusive, disparaging or intimidating behaviour which places inappropriate pressure on the recipient or has the effect of isolating or excluding them. Bullying can take the form of shouting, sarcasm, derogatory remarks concerning job performance or constant criticism.

Bullying is to be distinguished from vigorous academic debate or the actions of a manager making reasonable (but perhaps unpopular) requests of his/her staff.

The above list of examples is not exclusive and harassment can also take place on the grounds of a person's age, religion or any other characteristic that makes them different from the majority or from the person who harasses or bullies them. Although the terms 'harassment' and 'bullying' are not synonymous, the guidance in this policy document relates to both issues and the term 'harassment' will be used from this point onwards to encompass both.

2.2 Managers have an obligation to tackle issues of poor performance and therefore harassment and bullying is to be distinguished from a manager legitimately and appropriately invoking approved performance management or disciplinary procedures in accordance with ESO policy.

2.3 Third party harassment The Equality Act makes you potentially liable for harassment of your employees by people (third parties) who are not employees of your company, such as customers or clients. You will only be liable when harassment has occurred on at least two previous occasions, you are aware that it has taken place, and have not taken reasonable steps to prevent it from happening again.

3 Harassment - general principles

3.1 The overriding principles in dealing with allegations or concerns of harassment are that they must be **taken seriously, considered carefully and addressed speedily and where possible, in confidence.**

3.2 A member of staff or a student who feels that s/he is the subject of harassment (either by a colleague, a student or anyone else whom they come into contact with in the course of their work/studies) may wish to make a note of incidents, dates, times and any witnesses, for future reference. Any member of staff or student who considers themselves to have been the subject of harassment has the right to be

listened to and to be given informed advice on how the matter may be resolved. There are usually a number of options. Anyone who feels they have been harassed is likely to wish to speak to someone with whom they feel they share something in common. For this reason they should be able to approach one of a number of different people within the ESO (see section 5.1 below).

3.3 Should harassment occur in a group situation, the person in authority within the group has the responsibility to recognise harassment when it occurs and to take speedy action to stop it. It is important that it is made clear to the perpetrator that such behaviour is unacceptable at the ESO and will not be tolerated. Silence or inaction can be seen as collusion and endorsement of such behaviour. If the person in authority is the harasser, others within the group should support the individual being harassed in taking action to report the harassment.

4 How will allegations of harassment be dealt with? (Procedure)

In the event that a member of staff or student considers that they are experiencing harassment they have a number of options open to them:

- ❖ They may be able to speak directly to the individual concerned or to write to him/her expressing their concerns and requesting that the harassing behaviour stop immediately.
- ❖ Alternatively, (or subsequently if they achieve no success) they may wish to talk to someone in order to obtain another perspective on the situation and to ensure that someone else knows about it and can take action with them to ensure that it stops.
- ❖ A final option is to make a formal complaint.

5 The Informal Approach

5.1 Members of staff or students wishing to seek advice or discuss concerns about harassment may approach their line manager or year tutor, the HR Manager or the Student Welfare Officer or another manager within the ESO. The HR Manager and the Student Welfare Officer will be available for both staff and students so there is a choice of people to go to. .

This policy will be included in a series of lunch-time training sessions for staff.

5.2 Anyone approached by a member of staff or student who wishes to discuss the matter informally should

- find a quiet place to discuss the issue confidentially and without interruption
- listen carefully to what they are being told and ensure that they understand the full facts

- when they are sure they understand and if they feel confident to do so, they should discuss the options open to the individual.
- Notes should be made of the meeting.

5.3 Confidentiality is very important in dealing with cases of alleged harassment as experience shows that they will be much more difficult to resolve informally if information about the matter becomes common knowledge. Anyone raising an alleged issue of harassment and bullying may however wish to be accompanied by a colleague.

5.4 If after having been approached, an employee or student wishes to seek advice on how to deal with an alleged case of harassment they should seek the agreement of the person who has confided in them to that course of action. If they don't feel able to advise in a particular case they should explain the reasons to the person who has approached them and refer them to another manager or the HR Manager/Student Welfare Officer.

5.5 Having heard the facts about the incident and the context of the action or behaviour that caused concern, there are a number of informal options available to the individual to resolve the matter.

For example

- The person who has experienced harassment could **talk to the individual** on his/her own, or with a colleague accompanying him/her. The purpose of the conversation would be to make the respondent aware of the way his/her behaviour has been perceived and ask him/her not to repeat it.
- Alternatively, the **manager could facilitate a meeting between both parties** to give the complainant the opportunity to talk to the respondent and explain his/her view of the offending behaviour. Normally, no action should be taken following an informal approach concerning harassment, without the agreement of the individual concerned.

5.6 In some cases, both parties may wish to refer themselves for **mediation**. This will be facilitated by the Student Welfare Officer.

5.7 The action outlined above will be appropriate in many cases and will often be sufficient to resolve the matter. Where it is possible to resolve the matter by informal means, every effort should be made to do so and as swiftly as possible. A **formal complaint** should only be submitted as a 'final option', where the informal approach has not achieved satisfactory results, or in exceptional circumstances where the nature of the incident(s) warrants a more formal approach.

5.8 If an informal approach has failed or is inappropriate, then a formal complaint should be made via the **ESO Grievance Procedure or the Student Complaints Procedure**.

5.9 Staff who consider that they have experienced harassment from students can seek advice from their line manager or the HR manager. If the matter is not resolved informally to the satisfaction of the complainant, a formal complaint should be made in writing to the HR Manager via the ESO Grievance Procedure who will then progress the matter with the Head of Learning and Quality. A matter of this nature will be dealt with via the Student Code of Conduct, Disciplinary Procedure or the Fitness to Practise procedure.

6 A formal Complaint

6.1 Once it has been established that the issue has not been resolved, a formal complaint must be registered in writing as soon as possible via the Student Complaints Procedure (for students) or the ESO Grievance Procedure (for faculty and staff). A formal complaint of harassment should include the nature of the complaint, with reference to dates, times and places (where possible) in relation to a specific incident(s) and any (unsuccessful) efforts to resolve the matter. The names of any witness(es) to the incident(s) should also be included. Witnesses can request anonymity and this will be granted if appropriate, but this is not encouraged in the interests of openness and 'natural justice'.

6.2 While the formal complaint is under investigation, an alternative location, or timetable for the work of the complainant will be considered where requested (although there can be no guarantees that an alternative location can always be found). Where it is necessary to facilitate ongoing professional relations between the two parties, other possibilities such as an embargo on one to one meetings between the parties, or meetings without a third party present should be considered and facilitated by the line manager and Head of Department.

7 Investigating a formal complaint

7.1 A formal complaint of harassment should be sent under confidential cover to the HR Manager (Faculty and Staff) or the Quality, Teaching and Learning Manager (Students). Where the complaint involves either the HR Manager or the Quality, Teaching and Learning Manager the complaint should be forwarded under confidential cover to the Vice Principal. Where informal approaches have failed or the nature of the allegation warrants it, a formal investigation will commence. The HR Manager or the Quality Teaching and Learning Manager (Or the Vice Principal) will convene an Investigatory Panel to examine the matter within the time frames set out below. Where there has been no attempt to resolve the matter informally, the

complainant may be asked to follow an informal route to resolution before a formal panel is convened.

The Chair of the panel will take responsibility for ensuring the meetings take place within the agreed timeframe.

Process	Timeframe
Register of formal complaint	As soon as possible after the incident
Formal acknowledgement /receipt of complaint by HR/QTLM	Within 5 working days of receipt of formal complaint by HR
Respondent notified in writing by HR/QTLM of complaint and date set for written response. Complainant given a copy.	Within 5 working days of receipt of formal complaint
HR/QTLM set up investigatory panel * and agree date of hearing from the outset	Within 10 days of receipt of formal complaint
Notification to all parties of date of hearing	Within 10 days of receipt of formal complaint
All written submissions to panel, complainant and respondent	Not less than 7 calendar days before the hearing
Pre meeting briefing for investigatory panel	Within one week of receipt of written submissions by panel
First meeting of panel	Within one month of being appointed
Panel decision in writing to HR/QTLM	Within 5 working days of the last panel meeting
If case upheld, QTLM and HR Manager to determine what action needs to be taken	Within 5 working days of receipt of the investigatory panel report
Outcome of investigatory panel and action to be taken conveyed in	Within 7 calendar days of decision regarding action to

writing to respondent,	be taken
Outcome of investigatory panel conveyed in writing to complainant and heads of department where appropriate	Within 7 calendar days of decision regarding action to be taken
Witnesses informed in writing when investigation is complete and if case upheld	Within 7 calendar days of decision regarding action to be taken
N.B. Exceptionally, timescales may not be adhered to, or there may be delays through ESO closure, or absence of one of the parties etc.	In exceptional circumstances, HR will write to all parties with a revised timetable as soon as possible.

* The investigatory panel will consist of:

Chair: Member of Executive Team (excluding the Principal), one other line manager and ANO.

Notetaker: HR Manager

Appeal: CEO/Principal

7.2 The Panel

1. For faculty/staff, the Panel of 3 will include two senior managers.. The HR Manager will advise the panel. Wherever possible, no member of the Panel will be from the department in which the complainant, the respondent or any of the witnesses work and the panel should reflect a varied profile in terms of race, gender, disability age, religion or belief and sexual orientation wherever possible.
2. For students, the Panel of 3 will include one senior manager and the M^Ost Programme Leader, **the senior manager** will chair the meetings. The Q^TLM will advise the panel. The panel should reflect a varied profile in terms of race, gender, disability age, religion or belief and sexual orientation wherever possible.

7.3 Guidance notes for all those involved in the investigation of a formal complaint will be provided. A briefing on harassment and bullying will take place at the first pre meeting of each formal investigation panel. The HR Manager/Quality Teaching and Learning Manager will ensure that the respondent is informed in writing of the

complaint made against him/her and will ensure that all those attending a meeting of the Investigatory Panel are given sufficient notice in writing. Anyone required to attend an Investigatory Panel meeting may be accompanied by a colleague or Trades Union Representative. The complainant will have access to the respondent's submission or responses and any witness statements.

7.4 It is important to safeguard confidentiality and as such, none of the parties should discuss it with others, including members of the Panel outside the investigatory hearing, unless there is a legitimate reason for them to do so i.e. in order to be able to respond to an allegation, investigate and take action.

7.5 The respondent can seek support from their Trade Union/Student Association or the HR Manager/Student Welfare Officer who will refer them for external advice. .

7.6 A complaint of harassment may involve matters that are distressing or personal and which the complainant may find difficult to discuss in detail. The Chair of the Panel will therefore conduct its meeting(s) with the utmost sensitivity. A written record of the meeting(s) will be made, which may be presented as evidence to any subsequent disciplinary hearing.

7.7 The role of the Panel will be to interview the complainant, the respondent and any other relevant people such as named witnesses and to produce a report of its investigation outlining any proposals for action resulting from the Panel's findings. In the event that there has been action which could be perceived as retaliation, or victimisation since the complaint was made, this will be considered by the Panel in the course of their investigation. Formal notes of the meeting will be made. The report will be submitted under confidential cover to the Chair of the Panel, The HR Manager or the Quality, Teaching and Learning Manager will determine what action if any, needs to be taken. Where a formal complaint is upheld, action will be taken in all cases irrespective of the seniority or status of the respondent. The record of the meetings of Investigatory Panels will be stored confidentially by the HR Manager and will not be integrated with any individual's personal record file.

7.8 Where an allegation is of a serious nature amounting to gross misconduct under the Disciplinary Procedure relevant to the member of staff concerned, consideration will be given to immediate action under that procedure, which may include suspension of the respondent from work in accordance with agreed procedures. The procedures set out in this document do not inhibit any action that may be taken under the ESO's Disciplinary Procedures.

7.9 The Chair of the Panel will convey the outcome of an Investigatory Panel meeting in writing to the complainant, respondent and the relevant Head(s) of department where appropriate and will explain any actions resulting from it. Where appropriate,

training and/or counselling will be offered to the perpetrator to assist him/her in understanding how to avoid repeating the offending behaviour. Counselling will also be offered to the complainant.

7.10 Following a formal harassment complaint, either party may be concerned about working with the other again. Due regard of such views should be taken into account when offering counselling or mediation and a transfer of one or both parties to another, department, class group or location may be appropriate in some cases. Where an Investigatory Panel confirms a complaint of harassment, the transfer of the complainant would only take place with his/her agreement. The HR Manager and/or the Student Welfare Officer might facilitate the rebuilding of damaged relationships where this has occurred.

7.11 If either the complainant or the respondent feels that a formal investigation of a harassment complaint involving them has not been dealt with to their satisfaction, they may lodge an appeal within 5 working days of the outcome of the investigation. The appeal should go to either the Quality, Teaching and Learning Manager (Students) or the HR Manager (Employees)

7.12 Where a complaint of harassment and bullying has been upheld and disciplinary action is taken against the respondent, the Line Manager with advice from HR, should monitor the situation, to make sure there is no repeat in the offending behaviour and/or victimisation and/or lack of management, or support for the former complainant.

7.13 Following a finding of harassment or bullying any repeat behaviour of this type will result in disciplinary action.

8 Monitoring of the Policy

8.1 The Health and Safety Committee with the Quality, Teaching and Learning Manager will keep the implementation of this policy under review and will monitor its use annually.

Law relating to this document:

Leading statutory authority

Data Protection Act 1998

Equality Act 2010

Employment Rights Act 1996

If an employee or student is subjected to harassment, whether physical, verbal or non-verbal, on grounds of sex, transgender status, marital status (including civil partnership), race, disability, sexual orientation, religion or belief (including lack of belief), pregnancy & maternity or age, he or she may have grounds to bring a complaint to a tribunal under the Equality Act 2010. There is no minimum period of service required to bring a claim for discrimination or harassment to tribunal. Courts and tribunals have consistently interpreted harassment as behavior that is unwanted and offensive to the person on the receiving end, irrespective of the motive of the harasser. The Equality Act 2010 contains an express definition of harassment.

Please refer to the Equal Opportunities Policy which can be found on the ESO Learning Zone/staff section/policies and procedures.

It is important to note that the law states that it is **not** the intention of the perpetrator which defines a particular type of harassment but the effect it has on the recipient.

Revision History

Version	Change	Author	Date of Change
001	Change of personnel. Explanation of training and mediation.	Reviewed by H&S Committee	25-03-15
002	Change of personnel	JH	18-01-16

Annex One

What is bullying and harassment?

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

Harassment is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating his/her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her, even if this effect was not intended by the person responsible for the conduct.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Different people find different things acceptable. Everyone has the right to decide what behaviour is acceptable to him or her and to have his or her feelings respected by others. Behaviour which any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to him or her, eg sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, eg certain "banter", flirting or asking someone for a private drink after work. In these cases, first-time conduct which unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to him or her.

Harassment may also occur where a person engages in unwanted conduct towards another because he/she perceives that the recipient has a protected characteristic (for example, a perception that he or she is gay or disabled), when the recipient does not, in fact, have that protected characteristic. For example, it would be harassment for an individual to tease repeatedly an individual because of an incorrect belief that that the recipient is deaf. Similarly, harassment could take place where an individual is bullied or harassed because of another person with whom the individual is connected or associated, for example if his/her child is disabled, wife is pregnant or friend is a devout Christian.

Harassment also includes circumstances where an individual is subjected to unwanted conduct from a third party, such as a client or customer. For example, it might be that a client makes a series of racist remarks to a black employee. If an employee feels that he/she has been bullied or harassed by customers, suppliers, vendors or visitors, he/she should report any such behaviour to their manager who will take appropriate action. Bullying or harassment of customers, suppliers, vendors or visitors or others will be dealt with through the disciplinary procedure.

A single incident can be harassment if it is sufficiently serious.

All bullying and harassment is misconduct and is a disciplinary offence which will be dealt with under the ESO's disciplinary policy. Bullying or harassment will often be gross misconduct, which can lead to dismissal without notice.

Bullying or harassment will constitute unlawful discrimination where it relates to one of the protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age. Serious bullying or harassment may amount to other civil or criminal offences, eg a civil offence under the Protection from Harassment Act 1997 and criminal offences of assault.

Examples of bullying or harassment

Bullying and harassment may be misconduct that is physical, verbal or non-verbal, eg by letter or e-mail (so-called "flame-mail").

Examples of unacceptable behaviour that are covered by this policy include (but are not limited to):

- physical conduct ranging from unwelcome touching to serious assault;
- unwelcome sexual advances;
- the offer of rewards for going along with sexual advances, eg promotion, access to training;
- threats for rejecting sexual advances, eg suggestions that refusing advances will adversely affect the employee's employment, evaluation, pay, advancement, assigned work, or any other condition of employment or career development;
- demeaning comments about a person's appearance;
- unwelcome jokes or comments of a sexual or racial nature or about an individual's age, disability, sexual orientation or religion;
- questions about a person's sex life;
- unwanted nicknames related to a person's age, race or disability;
- the use of obscene gestures;

- excluding an individual because he/she is associated or connected with someone with a protected characteristic, eg his/her child is gay, spouse is black or parent is disabled;
- ignoring an individual because he/she is perceived to have a protected characteristic when he/she does not, in fact, have the protected characteristic), eg an employee is thought to be Jewish, or is perceived to be a transsexual;
- the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person, eg magazines, calendars or pin-ups;
- spreading malicious rumours or insulting someone;
- picking on someone or setting him/her up to fail;
- making threats or comments about someone's job security without good reason;
- ridiculing someone;
- isolation or non-cooperation at work;
- excluding someone from social activities.

What is victimisation?

Victimisation is subjecting a person to a detriment because he/she has, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing him/her or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because he/she has made a complaint or giving him/her a heavier or more difficult workload.

Provided that you act in good faith, ie you genuinely believe that what you are saying is true, you have a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the ESO will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised you.

Making a complaint that you know to be untrue, or giving evidence that you know to be untrue, may lead to disciplinary action being taken against you.

Dealing with allegations of Harassment and Bullying.		
HR Manager (Vice Principal if HRM involved) (Faculty and Staff)		Head of Learning and Quality (Vice Principal if HRM involved) (Students)
	Informal	
Success No further action		Success No further action
Fail Investigatory Panel (X 3 people) Chair: Member of SMT (not CEO/Principal) 1 X line manager +1 HR Manager – notetaker (or if involved ANO) Decision to HRM or VP Appeal Principal		Fail Investigatory Panel (X 3 people) Chair: One senior manager HLQ 1 X student 1 X notetaker Decision to HLQ or VP Appeal Principal