

Dignity at Work Policy
(Managing Bullying and Harassment Grievances)
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POLICY AUTHOR	Head of Employee Relations & Business Partnering

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policies@sussexpartnership.nhs.uk

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Guiding principles of our workforce policies

We are committed to improving staff experience and wellbeing, making sure our staff feel valued, supported and cared for. As part of this we want to do everything possible to ensure our policies are progressive, easy to understand and are used and applied in a fair and meaningful way. We also want to ensure our policies support staff even in difficult or challenging circumstances, facilitating decisions being made with transparency and impartiality.

1. Introduction

Sussex Partnership Foundation NHS Trust (the Trust) is committed to creating a work environment free of bullying and harassment for all employees, where everyone is treated with dignity and respect and protected from harassment, intimidation and other forms of bullying at work.

1.1 Purpose

The Trust has a zero-tolerance approach to bullying, harassment and victimisation and is committed to tackling this at all levels of the organisation. The purpose of this policy is to assist in maintaining a supportive working environment where unacceptable behaviour is easily identified, challenged, and stopped. It is intended this will improve employee performance, raise morale, reduce stress and absence levels and aid retention.

1.2 Scope

This policy covers bullying, harassment and victimisation of all employees, volunteers, contractors and bank workers and they are all responsible for ensuring that they treat others with respect and consider how their behaviour is perceived, in order to promote an inclusive and constructive environment which is in accordance with the Trust's Equality, Diversity and Human Rights Policy which can be found here - [Equality & Diversity Policy](#)

All employees carry a personal responsibility for their own behaviours in relation to this policy and are responsible for ensuring their conduct is in line with the standards set out in their contract.

The Trust has a Grievance policy which deals with concerns such as terms and conditions, new working practices, the working environment, etc. The policy can be found here: [Grievance \(Individual & Collective\) Policy & Procedure \(sussexpartnership.nhs.uk\)](#)

However, workers who believe they are the subject of bullying, harassment, or victimisation should raise their concerns using **this** policy as it deals specifically with these types of complaints.

If you have a concern that feels serious because it is about something that involves a possible danger, unsafe patient care, professional misconduct, competence or financial irregularity that might affect people who use our services, colleagues or the Trust itself, you should refer to the Raising Concerns Policy which can be found here: [Raising Concerns Policy \(Prev. Titled Whistleblowing - Freedom to Speak Up\) \(sussexpartnership.nhs.uk\)](#)

If you are unsure what policy you should refer to, you can seek advice from:

- Your trade union representative - [Trade Unions \(sussexpartnership.nhs.uk\)](https://www.sussexpartnership.nhs.uk)
- A member of the HR team - [Contact \(sussexpartnership.nhs.uk\)](https://www.sussexpartnership.nhs.uk)
- Freedom to Speak Up Lead: [Freedom to speak up \(sussexpartnership.nhs.uk\)](https://www.sussexpartnership.nhs.uk)

2.0 Policy

2.1 Principles

All complaints of bullying and harassment will be dealt with appropriately, objectively, promptly, sensitively, and fairly while ensuring the rights of both the Complainant and the alleged perpetrator.

All employees, contractors, bank workers, agency staff and those on secondment to other organisations will be made aware of this policy and will be encouraged to read and understand its processes.

All matters relating to any part of this procedure will be treated in strict confidence and any breach of confidentiality may render those responsible liable to disciplinary action. This principle also applies to witnesses. Please see section 4.2.2 regarding sharing of reports.

The individual accused of bullying and harassment must be made aware of the allegations against them and the name(s) of the individual(s) making the allegation, along with the name(s) of any witnesses and must be given the opportunity to respond to those allegations.

No employee will be victimised for making a complaint of bullying and harassment or assisting a colleague in making a complaint. Such conduct will be treated as a serious disciplinary offence. Please see section 2.2.8 in relation vexatious or malicious complaints.

Sometimes common sense and management discretion can mean moving away from policies and procedures is more helpful to all parties. Alternative options may be put forward by either party. Where policies and procedures are not followed, a clear explanation will be provided, agreement reached and documented.

2.2 Definitions

2.2.1 Bullying, harassment and unacceptable behaviour

Bullying and harassment tend to be used interchangeably however they are distinctly different.

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Harassment is unwanted conduct related to a protected characteristic(s), which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. The protected characteristics are set out in the Equality Act 2010. Please see [here](#).

Whatever the form of bullying or harassment, it will be unwanted behaviour which is unwelcome, unpleasant and unacceptable and would be reasonably regarded as such by any similarly situated person.

2.2.4 Verbal harassment

Statements, remarks, jokes, innuendos that may cause offence to anyone who hears, reads or witnesses them, the comments do not need to be made to the individual for them to be considered as derogatory, or which ridicule or insult a person. It can be the use of threatening or obscene language or attempts to stir up hatred or discontent including graffiti or hate mail.

2.2.5 Physical harassment

Assault or physical attacks, actions which intimidate or which ridicule, discomfort or embarrass individuals, including making threats or insulting hand gestures against an individual or group; spitting; and or damage to property.

2.2.6 Other unacceptable behaviour

Unacceptable behaviour in the context of bullying and harassment can be defined as behaviour that is abusive, threatening, lewd, intimidating, discriminatory or otherwise inappropriate/

It may take one or more of the following forms:

- Spreading malicious rumours, or insulting someone, particularly in relation to a protected characteristic
- Copying memos/ emails that are critical about someone to others who do not need to know
- Ridiculing or demeaning someone - picking on them or setting them up to fail
- Offensive language including innuendo, mockery and obscenity
- Subjecting an individual to constant humiliation or ridicule, belittling their efforts in front of others and sometimes, privately. For example, directly to an individual or to a third party
- Monitoring everything an individual does and being excessively critical about minor things
- Setting objectives with impossible deadlines
- Exclusion or victimisation
- Overbearing supervision or other misuse of power or position
- Making threats about job security
- Deliberately undermining a competent worker by overloading and constant criticism
- Preventing individuals progressing by intentionally blocking promotion or training opportunities
- Unfair treatment on the basis of trade union membership
- Displaying or distributing materials which degrade or offend. For example, offensive magazines or the writing or painting of insults or using graffiti, badges or other insignia whose purpose is to create hatred or discontent. In some cases, it can be the use of short messaging service (SMS or texts), blogging, tweeting or social network or social media sites such as Facebook and Twitter

2.2.7 Psychological/emotional abuse

Psychological abuse is any action which adversely impacts on an individual's emotional wellbeing, causing distress and affecting their quality of life and ability to function to fulfil their full potential.

Emotional abuse is 'any act including confinement, isolation, verbal assault, humiliation, intimidation, infantilization, or any other treatment which may diminish the sense of identity, dignity and self-worth.' ¹

Complainant(s) – employee or employees raising a complaint.

Respondent(s) – employee or employees who are subject to a complaint.

2.2.8 Vexatious or malicious complaints

All complaints of bullying and harassment will be treated within the context of the right of each individual to be treated with dignity and fairness. Staff that have bona fide complaints are encouraged to raise them without fear of recrimination, in the knowledge that the Trust takes the issue of bullying and harassment very seriously.

However, if a complaint is found to have not been made in good faith and/or made with malicious intent, or it has been identified through the investigation that the Complainant's behaviour or actions has contributed towards the alleged incident(s) this will be treated as a disciplinary offence which may result in disciplinary action.

If a member of staff believes that someone has deliberately made a false complaint against them they may bring a grievance against that person (or persons) under the Trust's Grievance policy. If that grievance is upheld, this may lead to disciplinary action being taken against the person or people who brought the malicious or vexatious complaint.

2.2.9 Victimisation

Victimisation occurs when a Complainant receives less favourable treatment as a result of having made a complaint, or it is suspected they have made a complaint, or if they have or are going to provide evidence about the behaviour, conduct or performance of a third party or parties. Where victimisation of a Complainant occurs, this could result in disciplinary action following investigation against the party who has acted in this way.

When the victimisation is related to an act of unlawful discrimination for example where an individual makes a complaint about race, age, sex or disability discrimination etc., then the act of victimisation itself could be deemed unlawful as well as resulting in disciplinary action following investigation.

Counter allegations

Where a formal counter-allegation is lodged as part of a process, this should be dealt with as a separate investigation although this may run concurrently with the original investigation with the same Investigating Officer, depending on the nature and timing of the allegations.

2.2.10 Personal relationships at work

The Trust recognises employees who work together may in some cases form friendships, romantic relationships or already be related to each other.

Whilst the organisation accepts such relationships exist amongst employees, it is expected employees keep their work and personal life separate, and to stay professional both when things are going well or if the relationship breaks down/ends.

Employees who are in a personal relationship at work are still expected to participate in a work environment that is professional and free of bullying and harassment for all employees. They may be subject to this policy should their behaviour be unwanted or inappropriate.

2.2.11 Fair and appropriate management

Managers are responsible for ensuring that staff who report to them perform to an acceptable standard. Legitimate, justifiable and appropriate monitoring and management of an employee's behaviour or work performance within good management practice does not constitute bullying and harassment.

It is reasonable to expect a manager to carry out these functions in a fair, proportionate and appropriate manner, and it is acknowledged that some staff may feel anxious while the procedures are on-going. However carrying out these functions in an appropriate way does not constitute an act of bullying or harassment. The table below demonstrates some examples.

Fair and appropriate management behaviours:	Bullying and/or harassing management behaviours:
Consistent and fair	Aggressive and inconsistent
Determined to achieve the best results but is reasonable and flexible.	Unreasonable and inflexible.
Willing to consult with colleagues and staff before finalising proposals	Believes they are always right, fixed opinions, believes they know better and they are not prepared to listen and consider other people's opinions.
Insists on high performance standards in service quality and behaviour within the team and accountability.	Insists on high performance standards in service quality and behaviour but crucially blames others if things go wrong.
Will discuss in private any perceived deterioration before forming any views or acting and does not apportion blame on others when things go wrong.	Loses their temper regularly, degrades people in front of others, and threatens official sanctions or warnings without listening to any explanation.

Reasonable management instructions to maintain patient care that is safe and of high quality	Makes unreasonable demands in relation to care that are outside of the employee's professional scope/boundaries
Asks for people's views, listens and assimilates feedback.	Tells people what will be happening and does not listen.
Adheres to policy and procedure and applies them fairly to all staff.	Ignores set down policy and procedures.

3.0 Duties

All staff have a duty to be familiar with workforce policies.

All employees should collaborate in stopping unacceptable behaviour by:

- treating colleagues with dignity and respect
- understanding how their own behaviour may affect others and, if necessary, changing it
- intervening, if possible, to stop unacceptable behaviour and giving support to recipients
- making it clear to colleagues if they find their behaviour unacceptable and explain why
- reporting allegations of bullying and harassment to their manager (or appropriate manager)

Managers

All managers in the trust have a responsibility to address any concerns regarding the inappropriate behaviour of a colleague to a member of staff. Addressing concerns should not rely solely on the member of staff experiencing the behaviours but also with any manager who observes a colleague has not acted in keeping with this policy, or the trust's own values. Where they are not the line manager, contact should be made with them to alert to them to their concerns and agree how the matter will be addressed if it was not appropriate to do so at the time it occurred. The member of staff will not always recognise they are experiencing inappropriate behaviour and so this being addressed at an early stage could prevent the situation escalating. For further advice, please speak to the appropriate member of the HR Department.

Trade Union Representatives

Trade union workplace representatives, otherwise known as stewards, are elected representatives whose role includes representing members both individually and collectively. All stewards have basic training in representation and access to regular training courses. They can gain support, advice and information from their branch, paid union officials via their regional offices and their union's online resources. Stewards are bound by the rules and governance structures of their union and are expected to keep up to date with relevant training.

The Trust recognises the important role that trade unions play in addressing bullying and harassment. Staff who are members of a trade union are encouraged to approach their trade union representative regarding their concerns. The Trust will work in conjunction with the Trade Unions in addressing unacceptable and inappropriate behaviour.

Support and representation

Employees have a right to be accompanied by a single companion. This can be a trade union representative (as noted above), or a colleague. They can address the hearing to put and sum up the worker's case, can express a view or opinion in an appropriate manner and in relation only to the case, and confer with the worker during the hearing. The companion does not, however, have the right to answer questions on the worker's behalf, address the hearing if the worker does not wish it or prevent the employer from explaining their case.

In exceptional circumstances there may be an occasion when it is recommended that a third party attends in an advisory capacity which should be with the agreement of those attending. This can be a representative from Occupational Health, Access to Work or an appropriate person who can support the employee such as a Care Worker. Family members or friends are not normally able to attend meetings or hearings.

4.0 Procedure

Sometimes common sense and management discretion can mean moving away from policies and procedures are more helpful to all parties. Where policies and procedures are not followed, a clear explanation should be provided and agreement reached between all parties and documented. Any dispute as a result of a management decision to move away from the policy without an individuals' agreement will be covered by the Grievance Procedure.

4.2 Procedure for dealing with harassment & bullying complaints

4.2.1 Informal approach to tackling bullying or harassment

It may be possible to sort out matters informally, particularly if the person does not know their behaviour is unwelcome or upsetting. An informal discussion may help them to understand the effect of their behaviour and agree to change it.

What to do if a colleague wants to discuss a concern about your behaviour with you

Do not ignore a complaint because you were only joking, or decide the Complainant was being too sensitive. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others - you may have offended someone without intending to. If that is the case, the person concerned may be willing to accept an apology from you and an assurance that you will be careful to avoid behaving in a way that might knowingly cause offence.

Provided that you do not repeat the behaviour which has caused offence, this is likely to be the end of the matter. It can be, and should be, seen as a useful learning experience about the effect of your behaviour on others, and therefore an opportunity for self-reflection and improvement.

If you are approached for this reason you can meet with them at once, or agree to meet to discuss the issues in the next couple of days, to give you time to reflect.

When you meet:

- listen to the points that are made without interrupting or getting defensive
- allow the Complainant to explain the way they feel
- seek clarification on what aspects of your behaviour are felt to be unacceptable;
- discuss how you might work together more effectively
- it may be a shock to be told about the effect of your behaviour, so if you need to, ask for a break or time to consider your response
- try to remain calm and avoid aggravating what is a difficult situation for both of you
- apologise, if appropriate

Managers, Complainants and Respondents are encouraged, wherever possible, to be open minded when trying to identify ways of resolving differences in order to maintain good employment relations. It is expected that all individuals involved will enter into the informal procedure in good faith, with the aim of resolving a particular issue.

People who witness unacceptable behaviour, as well as those whom experience it directly, have the right to raise concerns.

Some Complainants feel able to approach the person on their own, or with the help or support from a colleague, manager, Trade Union representative or the appropriate Staff Network Group Lead. Details can be found under section 3.

When raising a concern, politely tell the person what they have said or done that is offensive and unwelcome, and ask them to stop it immediately. It could be added that, if the behaviour continues, a formal complaint may be made.

If an employee feels unable to approach the person face to face they may want to consider putting their concerns in writing to the person. It should be made clear what they have said or done that is offensive and unwelcome and be asked to stop it immediately. Make it clear that, if the behaviour continues, a formal complaint may be made.

Mediation should be considered as a means of resolving a complaint at the informal stage provided both parties agree. Mediation should always be conducted by a formally trained mediator ensuring the necessary stages are managed properly. Advice should be sought from HR prior to progressing mediation. No attempt to formally mediate should be made by a manager who is not trained or where it has not been first discussed with a member of the HR team.

An individual may not feel able to approach the person themselves but prefer to raise the issue informally with their manager, or the next appropriate line manager.

It is advised that those who experience unacceptable behaviour keep a record of any incidents that occur or attempts to address the issue, noting the dates, times, circumstances and names of any witnesses. This will be useful in the event that they need to use the formal route to deal with the problem.

Support services for staff

The Trust recognises the distress and anxiety that such allegation can cause to both the Complainant and the alleged perpetrator. Support is available for both parties from a more senior manager, HR, trade union representative, professional association representative, self-referral to Occupational Health or support of a colleague.

In addition, a confidential 24-hour service is available from the Employee Assistance Programme. They offer a confidential and impartial telephone counselling service that is available to all employees and is independent of the Trust. You can access help sheets on a range of work, personal and well-being issues and access to the Health Assured website. You can find out more at:

www.healthassuredeap.com using the user name: Sussex Password: Partnership

Employees are asked to carefully consider using stage 1 prior to raising a complaint in stage 2. Any formal process can make it more difficult to work in harmonious way in future, depending on the outcome. Formal processes are always difficult for those involved. However, if the employee believes they have no option but to move to a formal stage, they should follow the procedure detailed below.

4.2.2 STAGE 1 - Formal procedure

If the informal process does not reach a satisfactory conclusion or if serious harassment or bullying occurs, employees are advised to escalate their complaint through to Stage 1 and may seek assistance in doing so.

The complaint may be made orally but must be confirmed in writing as soon as possible using the Complaint Form (**Appendix 1 in the Dignity at Work Tool Kit**) and the Monitoring Form (**Appendix 2 in the Dignity at Work Tool Kit**). We will provide alternative communication mediums if and when required, in line with a fair and equitable access procedures and the Equality Act 2010.

The form should be sent in confidence to the immediate manager. Where the Respondent is the Complainant's line manager, then the matter should be reported to the next level manager. If the Complainant needs assistance in making the complaint, a trade union representative or close work colleague may assist in this task.

Alternatively, such complaints can be sent directly to the Chief People Officer in a sealed confidential envelope marked 'Chief People Officer, Sussex Partnership NHS Foundation Trust.

Conducting an investigation

In all cases where an incident, allegation or problem has arisen and there may be a need for formal action, a fair and thorough investigation into all the circumstances will be undertaken. The manager in receipt of the form will identify a Case Manager (which could be themselves) who should appoint an Investigating Officer.

Please see the Investigation Policy & Procedure for full details [Investigation Policy & Procedure \(sussexpartnership.nhs.uk\)](http://sussexpartnership.nhs.uk)

Roles

Investigating Officer

The role of the Investigating Officer is to conduct a fair, full, thorough and balanced investigation, focussing on the incident or allegations made, and to present the facts of the case, in an objective and unbiased way, in an impartial report to the Case Manager. The Investigating Officer should look for evidence that supports and/or undermines the allegations. The investigation will always be carried out with support from the HR department who will appoint a named HR representative to liaise with the Investigating Officer and provide coaching and training where required.

The Investigating Officer will be appointed by the Case Manager. Decisions about who will be the Investigating Officer will consider time, capacity and experience. The Investigating Officer will be given dedicated time to carry out their remit within the time frames of the policy and should raise any concerns regarding capacity to complete the investigation on time with the Case Manager.

If it is not appropriate for the line manager to act as the Investigating Officer then a manager from another area should be appointed to investigate.

Case Manager (8a or above)

The Case Manager will oversee the entire case ensuring that the Investigating Officer is provided with the necessary time to undertake the investigation and that the process is progressing appropriately and timescales are being adhered to. The Case Manager is the general point of contact on issues around the investigation.

On receipt of the complaint the Case Manager will meet with the Complainant and discuss support available. Arrangements to meet will be agreed within **5 working days**. Following this, the Case Manager will arrange to meet with the Respondent to inform them of the allegation(s) and explain the process.

Depending on the severity of the case the Case Manager may consider whether a temporary move to another area is required. It is advisable that the Complainant should be given first choice as to whether they wish to be transferred, subject to practical limitations. In some cases, it may be more appropriate to redeploy the Complainant, following a discussion with them regarding the rationale, and with their agreement wherever possible. In severe cases and only as the last resort should the Case Manager consider suspending the Respondent. The Respondent should be informed that suspension is a neutral act whilst the complaint is investigated. Advice from HR should be sought prior to any decision being made and every option should be explored before making the decision to move or suspend.

The Investigation Officer is responsible for investigating the complaint. The investigation should commence within **10 working days** of receiving the complaint. If it is not possible to meet the timescales, all parties must agree a new timescale and be kept fully informed.

Any relevant witnesses should be interviewed and the importance and reasons for confidentiality must be emphasised. All parties should be advised that failure to maintain confidentiality may prejudice the outcome of the investigation. Any breach of confidentiality will be taken seriously and may be investigated via the Disciplinary Procedure.

On concluding the investigation, the Investigating Officer will produce a factual report ideally within 4 weeks of the last interview, for presentation to the Case Manager. Any delay in timescale needs to be raised with the Case Manager and HR. Agreement should be sought for a new deadline, the outcome of which will be communicated to all parties by the Case Manager

Following submission of the report, the Case Manager will meet with the Investigator(s) to discuss their findings after which a decision will be made as to the next course of action. The options available to the Case Manager at this point shall be:

- Accept the report;
- Request further information/investigation;
- Reject report and re-commission an investigation

4.2.3 If allegations of bullying and harassment are not upheld

The Case Manager will meet with the Complainant and the Respondent separately to confirm the conclusion of the investigation. The outcome will be provided in a follow up letter. Any development needs identified by the Case Manager as part of the outcome, these shall be addressed the supervision process.

If either party has been moved or suspended, they will return to the workplace as soon as possible.

A facilitated meeting will be required to support the working relationship between both parties to ensure they work together in a professional manner. This will be organised as soon as practicable.

Any request to transfer to another work area will be considered, taking account of whether suitable vacant post(s) are available, as well as operational needs of the organisation. Any requests to transfer to an alternative position will be the subject to normal recruitment and selection process. The transfer is not guaranteed and will not take precedence over 'at risk' staff and pay protection will not be applicable.

4.2.4 If allegations of bullying and harassment are upheld

The Case Manager who commissioned the investigation will hold separate meetings with the Complainant and the Respondent to confirm the conclusion of the investigation. This will also be confirmed in writing, providing detailed reasons of how the decision has been reached.

Recommendations may be one of or a combination of the following:

- Additional support for the Complainant;
- Stipulations around the future behaviour and conduct of the Respondent;
- Additional support and/or training for the Respondent;
- Mediation between the Complainant and the Respondent providing both parties agree to participating;
- Refer the matter to a disciplinary process. These disciplinary proceedings will not begin until the bullying and harassment procedure has been completed and cannot overturn its findings and recommendations. Please note that a disciplinary investigation may not require all parties and witnesses to be re-interviewed.

Failure to co-operate with recommended outcomes may be considered to be a failure to follow reasonable management instructions, and may be subject to disciplinary action.

The Respondent is not entitled to appeal the outcome of a bullying and harassment complaint raised against them.

The Respondent will be informed that further action will be taken in accordance to the Trust's Disciplinary Policy and that they will be required to attend a disciplinary hearing.

The Complainant will be advised that they will be required to attend a Disciplinary Hearing as a witness, unless there are exceptional circumstances which prevent them from doing so. If they are required to attend, they are entitled to be accompanied by either a Trade Union Representative or work colleague.

Please refer to the disciplinary policy in regards to holding a disciplinary hearing. The policy can be found on the intranet at: <http://policies.sussexpartnership.nhs.uk/workforce>

Information sharing

The Case Manager will send the investigation report to both the Complainant and the Respondent being investigated, (and representatives where engaged) normally within ten working days of the completion of the investigation. The reports will be shared on the basis that they are confidential to the parties involved and must not be shared any further. Failure to respect the need for confidentiality of the report could in itself, constitute a matter that requires investigation. In exceptional circumstances it may be necessary to redact personal or sensitive information from witness statements before sharing them with the report. If any of the material is relevant to the case it will be referenced in the report without disclosure of sensitive or personal details. The final decision on this will be made by the Chief People Officer (or nominee).

The outcomes/sanctions from any disciplinary process are confidential and will not be shared with the Complainant.

The Case Manager should ensure all relevant documentation is sent to the HR Department at the same time it is sent to the Complainant and Respondent. A copy of the decision will be held on the Complainant's file. If the complaint is upheld a copy will also be held on the Respondent's file

4.2.5 Responding to counter allegations

When a complaint of bullying and harassment is made, sometimes a counter-complaint is made. In these circumstances both complaints will be investigated simultaneously by the same Investigating Officer.

4.2.6 Appeals

Where the Complainant wishes to appeal the outcome, the process and the grounds for making that appeal are set out in Section 4.5 of the Trust's Disciplinary Policy and Procedure.

4.2.7 Confidentiality

All employees involved with the investigation of bullying and harassment complaints and any subsequent processes are required to maintain confidentiality. All complaints raised in line with this policy, associated correspondence and interviews will be treated in strict confidence. Any breaches of confidentiality will be subject to disciplinary action in accordance with the Trust's Disciplinary policy and procedure.

5. Development, consultation and ratification

This policy has been developed in partnership with Staff Side colleagues through the HR Policy Working Group and ratified at both the Trust Partnership Forum.

6.0 Equality and Human Rights Impact Assessments (EHRIA)

The policy has undergone an equality and human rights impact assessment.

7. Monitoring compliance

The HR Department will commission Audits from time to time and maintain statistics and monitor trends which will be reported regularly to the People Committee, a subcommittee of the Board. Updates will take place at the review date or before in line with changes in legislation, case law or best practice.

Some policies are audited annually and published as part of the Equality, Diversity and Human Rights Report to check compliance.

8. Dissemination and implementation of policy

This policy will be circulated to all staff by means of communication tools available to the Trust such as Partnership Bulletins, leadership briefings, circulated at team meetings and will be placed on SUSI. New staff will be made aware of the policy at the Trust induction. Paper copies will be made available to members of staff on request. Training for managers will be offered to ensure that they are familiar with the policy and its procedures.

9.0 Document control including archive arrangements

It will be the responsibility of the Sponsor and Author of this policy document to ensure that it is kept up to date with any local, national policy or legislation. The policy will be managed in accordance with the Policy for Procedural Documents.

10.0 Reference documents – not applicable

11.0 Bibliography

The Equality Act 2010
The Health and Safety at Work Act 1974

12.0 Glossary – not applicable

13.0 Cross reference

- Complaints Management Policy and Procedure
- Disciplinary Policy and Procedure
- Equality and Diversity Policy
- Grievance Policy
- Investigation Policy
- Management, reporting, recording and investigation of incidents policy
- Policy for procedural documents - an organisation-wide policy for the development and management of procedural documents
- Prevention and Management of Violence and Aggression Policy
- Raising matters of concern (Whistleblowing) policy