REGULATIONS

E23 Policy and Procedure on Harassment and Bullying

Part 1 - Introduction and Definitions

1 **Introduction**

1.1 Oxford Brookes University has adopted equality, diversity and inclusion as core values and seeks to be a genuinely inclusive organisation which promotes equality and celebrates diversity. The University takes a zero-tolerance approach to any form of harassment, bullying or victimisation and expects all members of the University community to treat each other with dignity and respect.

1.2 The Brookes Charter and the Code of Conduct for Staff describe the mutual expectations and responsibilities of staff and students. All staff and students are expected to uphold these principles and to support and promote the creation of a safe working, learning and social environment, free from harassment and bullying.

1.3 The aims of this policy and procedure are, therefore, to:

a. Provide a framework of support for staff and students who feel they[1] have been subject to harassment or bullying; and
b. Provide mechanisms by which complaints of harassment or bullying can be addressed in a practical and timely way.

1.4 The University strongly encourages any member of staff or student who considers they are experiencing harassment or bullying to take action using the procedures set out in Part 2 (Staff) and Part 3 (Students) of this policy. The University in turn commits to take seriously and investigate thoroughly any allegations of harassment or bullying that are formally brought to its attention. No person will be treated less favourably for bringing an allegation in good faith. Where such an allegation is deemed to be well-founded, action will be taken against the perpetrator(s), in accordance with the appropriate disciplinary procedure, up to and including the dismissal of staff or the expulsion of students. Individuals who engage in unlawful harassment may also be held personally liable for their actions and subject to prosecution under criminal law.

1.5 Visitors are expected to observe this policy. Any visitor who feels they have experienced harassment or bullying during their visit should refer their complaint to the Registrar and Chief Operating Officer. A member of staff or student who feels that they have been harassed by a visitor to the University should follow the procedures in Part 2 or 3 of this document.

2 **Scope**

This policy applies to:

- All members of staff, both full-time and part-time, including temporary staff, honorary staff and contracted staff or self-employed consultants working on the University's premises.

[1] The University acknowledges that some people do not identify with binary genders and the pronoun "they" is used in both a singular and plural context.

- Registered students of the University, whether on campus, in halls or private accommodation, or at university events.
- All visitors to the University.

3 What is harassment and bullying?

3.1 All members of the University community have the right to work, study and live without fear of harassment, bullying, intimidation, abuse, or violent behaviour.

3.2 **Harassment** is any behaviour that is unwanted[2] which has the purpose or effect of:

- violating another person's dignity, and/or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for another person.

3.2 The **Equality Act 2010** expressly covers harassment where this is related to a relevant protected characteristic. The relevant protected characteristics are:

- age
- disability
- gender reassignment
- race
- religion or belief (including lack of belief),
- sex, and
- sexual orientation.

Harassment related to these protected characteristics is a form of discrimination and is unlawful. The complainant need not possess the relevant characteristic themselves and can be harassed:

- because of their association with a person who has a protected characteristic,
- because they are wrongly perceived to have a protected characteristic, or
- because the harassment is directed at someone else or even at no-one in particular, and is related to a protected characteristic, but the complainant still finds it offensive.

3.3 However, the University recognises that the legislation is not fully inclusive and seeks to go beyond the legislation. This policy and procedures, therefore, cover **all** members of the university community regardless of their background or how they identify.

3.4 **Bullying** is a form of harassment and may not meet the legal definition of harassment. For the purposes of this policy it is characterised as offensive, intimidating, malicious or insulting behaviour, or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient. Bullying can be carried out by an individual or a group. It can take many forms, including someone in authority bullying an individual who is less senior, peer to peer bullying, an individual bullying a manager or a student bullying a member of teaching staff or vice versa.

3.5 **Cyber bullying** is a term used to refer to harassment and bullying through electronic media, including emails and other social media. Cyber harassment and bullying will be dealt with in the same way as other forms of bullying. For further information see the Social Media Guidelines (https://www.brookes.ac.uk/services/hr/handbook/terms_conditions/social_media_guidelines.html) and the Regulation for the Use of IT Facilities at Oxford Brookes University (http://obis.brookes.ac.uk/ITRegulations.html).

3.6 A **hate crime** can be defined as: "Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or

[2] "Unwanted" has the meaning of "unwelcome" or "uninvited" as defined by the Equality and Human Rights Commission. It is not necessary for someone to say that they object to the behaviour for it to be unwanted.

perceived disability and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender."[3] Incidents of alleged hate crime will be treated as harassment under this policy and the University (in consultation with the complainant – see section 7) reserves the right to report to the police any incident which it believes may constitute a criminal offence (see also section 6.3 below).

3.7 The University seeks to protect any member of the university community from **victimisation**, which is a form of misconduct which may itself result in a disciplinary process. For the purposes of this policy, victimisation occurs where a person is subjected to detrimental treatment because they have, in good faith:

- made an allegation of harassment or bullying, or
- indicated an intention to make such an allegation, or
- assisted or supported another person in bringing forward such an allegation, or
- participated in an investigation of a complaint, or
- participated in any disciplinary hearing arising from an investigation, or
- taken any other steps in connection with this policy and procedure, or
- is suspected of having done so.

3.8 **Freedom of speech** and academic freedom are protected by law (section 43 of the Education Act 1986) although these rights must be exercised within the law. Vigorous academic debate will not amount to harassment or bullying when it is conducted respectfully and without violating the dignity of others or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

4 What behaviour constitutes harassment or bullying?

4.1 Harassment or bullying may involve repeated forms of unwanted behaviour, but they can also involve a one-off incident.

4.2 The intentions of the alleged harasser(s)/bully(ies) are not always determinative of whether harassment or bullying has taken place, it can be unintentional. The perception of the complainant and the extent to which that perception may be regarded as reasonable in the circumstances will also be relevant.

4.3. Being under the influence of alcohol, drugs or otherwise being intoxicated is not an excuse for harassment or bullying. Indeed, it may be regarded as an aggravating factor.

4.4 Harassment and bullying can take a variety of forms, and may involve either individuals and/or groups.

(i) Examples of behaviour which may amount to **harassment** include (but are not limited to) the following:

- Making negative comments about personal or physical characteristics or appearance, including teasing, insults, derogatory name-calling.
- The telling of homophobic, sexist, transphobic, ageist, ‘ableist’ or racist jokes and/or banter.
- Spreading rumours or engaging in open hostility through verbal or physical threats.
- Offensive gestures or body language.
- Physical contact, ranging from an invasion of personal space to assault, including all forms of sexual harassment, including:
  - i. inappropriate body language;
  - ii. sexually explicit remarks or innuendoes;
  - iii. unwanted sexual advances and touching;

[3] Association of Chief Police Officers and Crown Prosecution Service

iv. persistent unwelcome requests for social or sexual encounters and favours. (These activities will be considered very serious if accompanied by either explicit or implicit promises for compliance or threats of penalties for non-compliance.)

- Publishing, circulating or displaying pornographic, racist, homophobic, sexually suggestive or otherwise offensive pictures or other visual or written materials, communications or images.
- Threatening to disclose, or disclosing ("outing"), a person as lesbian, gay, bisexual, or other sexual orientation, or transgender or other gender identity to others without their permission.
- Deliberately using the wrong name or pronoun in relation to a transgender person or persistently referring to their gender identity history.
- Intrusive questioning about someone's private life or of an intimate nature, especially related to a transgender person.
- Insulting, abusive, embarrassing or patronising behaviour or comments, humiliating, intimidating, and/or demeaning criticism.
- Persistently ignoring or patronising ("talking down to") someone.
- Shouting at, insulting, threatening, disparaging or intimidating someone.
- Repeatedly criticising an individual without providing constructive support to address any performance concerns.
- Exclusion from normal work or study place, conversations, or social events.

ii) **Bullying** may occur in ways which are obvious and easy to identify but others are more subtle. Examples include (but are not limited to) the following:

- Ignoring or belittling someone's views and opinions;
- Deliberately withholding information or excluding someone which may affect their performance or wellbeing;
- Setting unreasonable demands;
- Excessive supervision or misuse of power or position.

4.5 **Stalking may** also be a form of harassment and may be characterised by any of the following repeated and unwanted behaviours:

- Following a person;
- Contacting, or attempting to contact, a person by any means;
- Publishing any statement or other material –
  - Relating or purporting to relate to a person/persons, or
  - Purporting to originate from a person;
- Monitoring the use by a person of the internet, email or any other form of electronic communication
- Loitering in any place (whether public or private) where the person who is the focus of wanted attention is likely to be;
- Interfering with any property in the possession of a person;
- Watching or spying on a person/persons including through the use of CCTV or electronic surveillance.

5 Responsibilities

5.1 All managers have a responsibility to implement this policy and to make every effort to ensure that harassment, bullying and victimisation do not occur in the areas of work for which they are responsible. Where such behaviour does occur, the manager should ensure that any concerns are investigated promptly and effectively.

5.2 All teaching staff have a duty to implement this policy and to make every effort to ensure that harassment, bullying and victimisation do not occur in the learning environments for which they are responsible and that if they do occur, any concerns are investigated promptly and effectively.

5.3 All members of the university community (staff, students and visitors) have the right to be treated with dignity and respect by others, and a corresponding responsibility to treat others with dignity and respect. All members of the university community have a personal responsibility for complying with this policy and should discourage any form of harassment or bullying by making it clear, should they encounter it, that such behaviour is unacceptable.

6 Complaints of harassment or bullying

6.1 Harassment and bullying are serious offences and could result in disciplinary action. The University encourages staff, students and visitors who are affected to take action in accordance with the procedures outlined in section 2 (staff) or section 3 (students). No person will be treated less favourably or suffer any detriment for having raised or supported an allegation made in good faith.

6.2 If a person believes they are being subjected to harassment or bullying they should be encouraged to keep a record of incidents that occur. This should include dates, times, locations, witnesses and any other relevant information. This information may be used in any investigation of a complaint of harassment or bullying.

6.3 When a criminal offence may have been committed, the University (in consultation with any individual victim – see section 7) reserves the right to report the matter to the police. Such incidents will include, but are not be limited to, serious assault or threat of serious assault. Students can seek advice in confidence from the Head of Wellbeing, the Senior University Warden and/or Brookes Union Advice Centre, and/or approach the police directly. Staff can seek advice from the Director of Human Resources and/or approach the police directly (see also section 3.6 above).

6.4 If a complainant is deemed to have known or to have reasonably been expected to know that a complaint was unfounded, the allegation of harassment or bullying may be judged to be vexatious or malicious, and disciplinary action may be taken against them. No action will be taken if a complaint which proves to be unfounded is judged to have been made in good faith.

7 Confidentiality

All parties involved in a complaint (including any witnesses who may be interviewed as part of any investigation, or trade union representatives supporting any of the parties) must maintain confidentiality at all times. Those involved in advising complainants should, where possible, seek the consent of the individual for the onward disclosure of relevant information to those with a clear need to know. Where such consent is not forthcoming, the person entrusted with the information should make it clear that, in exceptional circumstances, it may be necessary to disclose the information, taking account of the duty of care which may be owed to the individual and/or others.

8 Monitoring and records

8.1 Confidential records of cases will be retained by Human Resources (in respect of staff) and Wellbeing (in respect of students), as appropriate, in accordance with the University's Data Protection Policy.

8.2 The University will collect information relating to the staff or student experience through surveys. Specific questions relating to harassment or bullying will be included where appropriate and responses will be anonymised, ensuring that individuals cannot be identified.

8.3 Anonymised statistics of complaints will be provided to the Equality, Diversity & Inclusion Advisory Group on an annual basis from data held by the Human Resource Management and Wellbeing departments. Requests for advice and support will be monitored through completion of anonymised feedback forms available to those indicated in sections 11 and 14 which will be collected by the Human Resource Management and Wellbeing departments.

9 Training

The University aims to provide appropriate training to create an environment free of harassment and bullying and to develop appropriate skills for those who have a responsibility for dealing with cases of harassment or bullying. In particular, HR will provide regular training for Staff Harassment Advisers (see Annex 1).

10 Review

This policy and procedure is owned jointly by the Directorates of Human Resources and Academic and Student Affairs (Wellbeing) and will be subject to review every three years.

Part 2 - Staff Procedures

11 Advice and support

It is important that any member of the University community who feels they have been subject to, has witnessed, or is accused of harassment or bullying can talk in confidence to someone they feel comfortable with about their concerns and options for dealing with those concerns. Advice and support for staff may be obtained from a range of staff and services as follows:

- Staff Harassment Advisers offer an impartial, confidential, listening ear and can help clarify possible courses of action and university processes. Advice is also available to those who have been accused of bullying and harassment. Details of Staff Harassment Advisers are given in Annex 1.
- Their line manager, or their manager's manager
- The Equality, Diversity and Inclusion Adviser (Staff) (https://www.brookes.ac.uk/staff/human-resources/equality-diversity-and-inclusion/edi-at-brookes/contacts/)
- Their Link HR Business Partner or HR Manager (https://www2.brookes.ac.uk/services/hr/hr_teams.html)
- The Multifaith Chaplaincy (http://www.brookes.ac.uk/students/wellbeing/chaplaincy/), and
- Occupational Health (contact details on Health and Safety web pages - http://www.brookes.ac.uk/services/hr/health_safety/)
- For trade union members, their trade union representative (http://oxfordbrookes.web.ucu.org.uk/ or (http://www.brookes.ac.uk/other/unison/).

12 Informal Action

12.1 It is important that the matter is dealt with quickly, sensitively, confidentially and effectively. It may be preferable in the first instance (but not necessarily always) to attempt to rectify matters **informally** (see also section 12.4). For example, sometimes people are not aware that their behaviour is unwanted and an informal discussion can lead to greater understanding and an agreement that the behaviour will cease. If the individual experiencing harassment or bullying feels able to, they should talk directly to the person whose behaviour is causing them concern. The perpetrator may not know that their behaviour is unwelcome or upsetting. The person should be informed of the behaviour that is considered offensive and unwelcome and that it should cease.

12.2 If the individual does not feel able to talk directly to the person concerned (and at no time should a member of staff feel obliged to approach an alleged harasser) or they would like some advice about the situation, advice and support are available as under section 11 above.

12.3 Mediation, where deemed appropriate, may be arranged through the Directorate of Human Resources for staff if both parties agree. A mediator acts as an impartial third party, helping the individuals involved to identify and negotiate an acceptable and appropriate resolution.

12.4 Where it has not been possible to achieve resolution through an informal approach or in more serious cases, the formal procedures indicated in section 13 below should be followed.

12.5 At any stage of the process, informal or formal, either party involved in a complaints process may be accompanied by a work colleague or trade union representative.

13 Formal procedures

All cases of alleged harassment or bullying raised by a staff member will be fully investigated.

13.1 A member of staff who believes that they or others have been **harassed or bullied by another member of staff**:

13.1.1 A formal complaint should normally be made in writing to the line manager of the person being complained about or their own line manager for appropriate referral on (if they feel more comfortable making a sensitive complaint to someone they know). The HR Business Partner or a Trade Union representative may be approached to provide advice in preparing the complaint letter.

13.1.2 If the person complained against is their own line manager, the complaint should normally be made to that person's line manager.

13.1.3 If the person complained against is a PVC/Dean or a Director, the complaint should be addressed to the Director of Human Resources.

13.1.4 If the manager receiving the complaint has already been involved in trying to resolve it informally, another senior manager should deal with the formal complaint (normally the manager's line manager).

13.1.5 Any letter of complaint should include the following:

- Who the complaint is being made against;
- The nature of the incident(s) and when it/they occurred;
- Details of any action taken to resolve the matter informally;
- The remedy sought.

13.1.6 **Group Complaints**

(i) If more than one person alleges harassment or bullying against the same source, and wishes to lodge a complaint as a group, they may opt to appoint a spokesperson(s) for the group. The same procedure should be followed as for individual complaints. All communications should pass through the appointed spokesperson(s) and it will be the responsibility of the spokesperson(s) to inform the rest of the group about the progress of the case.

(ii) In such cases, it is not always necessary for all those involved to be present at all meetings, but appropriate representatives should be agreed at each stage. Nevertheless, all those involved in the group complaint cannot expect to remain anonymous as they may need to be interviewed on an individual basis as part of the investigation.

13.1.7 **How managers should deal with complaints**

A line manager receiving a complaint from an employee is expected to respond sensitively; and to provide advice about the procedures and the time scales. The Directorate of Human Resources is available to give advice and support to both the manager and the parties to the complaint. Every effort will be made to deal with the matter as quickly as possible.

13.1.8 The following steps should be followed:

Stage 1

The line manager will normally carry out an initial investigation of the complaint. This should include a meeting with each of the parties to the complaint, and any witnesses. The employee accused will be given details of the complaint and of the name of the complainant, as well as a copy of this policy.

The person complained against will be given the opportunity to state their case and to respond in writing. Any written response will be copied to the complainant.

The manager concerned will consult the Directorate of Human Resources and agree the course of action to be taken, bearing in mind the seriousness of the allegations. The responses might include:

- Discussion with both parties separately or jointly with a view to reaching an agreed resolution.
- With the agreement of the parties, arrange mediation through the Directorate of Human Resources with a view to reaching an agreed resolution.
- Training and advice for the person who is the subject of the complaint relating to their behaviour.
- Issue an informal disciplinary warning.
- Refer the matter for a full investigation under Stage 2.

The line manager will inform the parties to the complaint of the outcome of Stage 1 in writing.

Stage 2

Where there are allegations of a serious nature which have the potential to lead to disciplinary action, or if the complainant is not satisfied with the outcome of Stage 1, an independent investigation will be arranged by the Directorate of Human Resources.

The investigation panel should consist of at least two people at management level, who are not connected in any way with the complaint that has been made, and who should not normally be from the same Faculty/Directorate as either party. If the complainant or person complained against has evidence that a particular member of the panel may have a conflict of interest, consideration will be given to any objection that is raised.

The panel will be responsible for investigating the complaint and setting the timescales in consultation with the parties. All those invited to an investigatory meeting with have the right to be accompanied by a colleague or trade union representative.

Consideration should be given as to whether the parties can continue to work together whilst the investigation is being carried out and, where necessary, alternative arrangements made. In serious cases, consideration should be given to temporarily moving or suspending on full pay the person complained about for as short a time as possible.

The panel will present its findings to the relevant PVC Dean/Director and the Director of Human Resources (or her nominated deputy), who will decide what further action will be appropriate (which may include formal disciplinary action).

13.1.9 **Possible outcomes of a formal complaint**

(i) The allegation is not substantiated: misunderstandings are clarified and resolved; resolution through mediation may be considered.

(ii) The allegation is substantiated but does not warrant formal disciplinary action: the person complained against may be asked to give an undertaking that the behaviour will stop, or that an action will not be repeated; training and advice for the person who is the subject of the complaint relating to their behaviour (e.g. awareness raising, counselling, mentoring, staff development, monitoring for a fixed period).

(iii) Disciplinary action: serious cases of bullying or harassment will be treated as gross misconduct and may result in dismissal. The person concerned may be suspended from work pending the outcome of the disciplinary process.

13.1.10 Prior to any further action being taken there will be discussion with any union representatives involved.

13.1.11 A report of the investigation will be provided to the parties to the complaint. Separate reports will be made in cases where there is more than one person complained about and/or more than one person making a complaint.

13.1.12 Both parties will be advised of the outcome, which will as far as possible remain confidential to the parties involved.

13.1.13 Following disciplinary or formal action, consideration will be given to future working relationships which may involve relocation of the perpetrator (or the complainant where they request it).

Stage 3

If the employee is not satisfied with the outcome of Stage 2, they may ask for the matter to be considered by a Grievance Panel (in accordance with the final stage of the Grievance Procedure).

13.2 A member of staff who believes that they or others have been **harassed or bullied by a student :**

The staff member should refer to the appropriate Disciplinary Officer under the Student Conduct Regulations.

13.3 A member of staff who believes that they or others have been **harassed or bullied by a visitor** to the University or a contractor:

The line manager of the employee making the complaint should decide the most appropriate course of action, which may include: talking to the person and/or a senior member of staff and the contracting company, asking for another representative of the contracting company to attend instead or taking action to bar the particular individual complained about.

Part 3 - Student Procedures

14 Advice and support

It is important that any member of the University community who feels they have been subject to, who has witnessed, or is accused of harassment or bullying can talk in confidence to someone they feel comfortable with about their concerns and options for dealing with those concerns. Advice and support for students may be obtained from a range of staff and services as follows:

- Wellbeing advisers and/or counsellors, the Senior University Warden and/or the Head of Wellbeing (https://www.brookes.ac.uk/students/wellbeing/).

- Brookes' Union Advice Centre and Brookes Union officers (http://www.brookesunion.org.uk/)
- Student Support Co-ordinators (contact details on each faculty's web pages)
- The Equality, Diversity and Inclusion Adviser (Students) (http://www.brookes.ac.uk/students/wellbeing/edi-adviser/)
- The Student Disputes Office (Academic & Student Affairs) (https://www.brookes.ac.uk/students/your-studies/student-disputes/)
- The Multifaith Chaplaincy (http://www.brookes.ac.uk/students/wellbeing/chaplaincy/)

15 Informal action

15.1 It is important that the matter is dealt with quickly, sensitively, confidentially and effectively. It may be preferable in the first instance to attempt to rectify matters **informally** (see also section 15.3). For example, sometimes people are not aware that their behaviour is unwelcome and an informal discussion can lead to greater understanding and an agreement that the behaviour will cease. If the individual experiencing harassment or bullying feels able to, they should talk directly to the person whose behaviour is causing them concern. The perpetrator may not know that their behaviour is unwelcome or upsetting. The person should be informed of the behaviour that is considered offensive and unwelcome and that it should cease.

15.2 If the individual does not feel able to talk directly to the person concerned (and at no time should a student feel obliged to approach an alleged harasser) or they would like some advice about the situation, advice and support are available as under section 14 above.

15.3 Where it has not been possible to achieve resolution through an informal approach or in more serious cases, the formal procedure indicated in section 16 below should be followed.

15.4 At any stage of the process, informal or formal, either party involved in a complaints process may be accompanied by a friend, relative or Brookes Union representative.

16 Formal procedures

All cases of alleged harassment or bullying raised by a student will be fully investigated.

16.1 A **student** who believes that they or others have been bullied or harassed either by another student, a member of staff or others may raise this via the **Student Complaint Procedure** [link].

16.2 If the investigation finds *prima facie* evidence of bullying or harassment, this will be dealt with under the **Student Conduct Regulations** or, if the matter concerns a member of staff, the **Staff Disciplinary Procedure**.

For further information about these regulations, please contact Human Resources.

Prepared by: Human Resources/Wellbeing

Approved by: Executive Board, 5 December 2016

Next reviewed: 5 December 2019

Annex 1

Staff Harassment Advisers

1 Oxford Brookes University is committed to providing a safe working environment free from harassment and bullying, supporting the right of all its community to be treated with respect. As part of that commitment, the University provides a network of trained Staff Harassment Advisers who are a first point of contact for staff who are concerned about bullying and harassment.

2 Staff Harassment Advisers are staff who have volunteered their time to provide an information service both to those who feel they are experiencing unwanted behaviour or to those who have been accused of perpetrating unwanted behaviour. However, the same Adviser will not provide advice to both the complainant and alleged perpetrator.

3 **A Harassment Adviser**:

- Provides a supportive and confidential listening service outside of the usual University structures and services;
- Provides information on the options that are available;
- Assists those seeking advice in thinking those options through, but respects the wishes of the member of staff.

4 **A Harassment Adviser cannot:**

- Make judgements about the legitimacy of a complaint or act as an investigator - staff nominated by the Directorate of Human Resources will undertake formal investigations;
- Provide counselling. If the Adviser discerns a member of staff might benefit from counselling, they can signpost them to the Occupational Health Service.
- Act as an advocate - Harassment Advisers provide informal support only and cannot meet with other parties to the situation;
- Meet with members of staff outside of office hours or outside of the University premises.

5 **Who are Staff Harassment Advisers and how can they be contacted?**

- Harassment Advisers are drawn from a variety of areas across the University.
- A list of Harassment Advisers can be found on the EDI website [link] and can be contacted directly. They work on a cross-University basis so it's not necessary to contact someone from your own faculty or directorate.

6 **How to become a Harassment Adviser**

Anyone interested in becoming a Harassment Adviser should contact the EDI Adviser (Staff) in the HR Directorate [link to contact details]. Harassment Advisers undergo initial training and then are expected to participate in ongoing development sessions and Adviser network meetings.

7 **Monitoring and Data Protection**

- Harassment Advisers may need to meet with members of staff more than once. To avoid the need to cover ground already discussed, with the agreement of the employee, they may take notes at a meeting. Notes will be used only to provide a history of discussions and advice.
- Any notes taken will be stored confidentially and only accessible to the Harassment Adviser. They will be retained for a period of six months after the final meeting after which they will be destroyed.
- For statistical purposes, information relating to complaints will be collated using a monitoring form and may be used in reports made to the EDI Advisory Group and senior management.

The form is anonymous and will not be used or presented in any way as to make individuals identifiable.

HR Directorate
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