



DUBLIN

Front Line Defenders – Head Office
Second Floor, Grattan House
Temple Road, Blackrock
Co. Dublin, A94 FA39, Ireland

info@frontlinedefenders.org
www.frontlinedefenders.org

phone +353 1 212 3750
fax +353 1 212 1001

BRUSSELS

Front Line Defenders – EU Office
Square Marie-Louise 72
1000 Brussels
Belgium

euoffice@frontlinedefenders.org
www.frontlinedefenders.org

phone +32 2 230 9383
fax +32 2 230 0028

Front Line Defenders Equal Opportunities Policy

1. Overall Policy Statement and Aims

1.1 Equality Statement:

Consistent with Front Line Defenders' philosophy of inclusive learning, trust and mutual respect, significant emphasis is placed on equality in our working environment. Engaging in the richness of diversity is central to the role of Front Line Defenders and in line with its core values.

Front Line Defenders is committed to equality of opportunity and positive action to promote equality of opportunity; equal opportunity is promoted as a means of developing the full potential of everyone involved in the organisation. The organisation believes that an Equal Opportunities Policy helps to ensure that there is no unjustified discrimination in the recruitment, retention, training and development of staff, interns and volunteers.

Discrimination, victimisation or harassment on grounds including but not limited to gender, marital status, family status, sexual orientation, religion, age, disability, race¹, or membership of the traveller community, will not be tolerated.

Front Line Defenders does not discriminate against any employee, intern or volunteer, or any applicant for employment or volunteering, because of gender, marital status, family status, sexual orientation, religion, age, disability, race, or membership of the traveller community.

Front Line Defenders is committed to best practice in providing equal opportunities for all job applicants and staff. The organisation believes that all people should be treated with respect and values diversity.

Front Line Defenders adheres to the Employment Equality Acts, 1998 – 2011 and the Equal Status Act, 2000 – 2011. To ensure that the policy is effective and no applicant or employee receives less favourable treatment, the organisation will promote equality of opportunity and prohibit discrimination across nine grounds:²

- Gender
- Civil status
- Family status
- Sexual orientation
- Religion
- Age

¹ While the term 'race' is used here as it appears in Ireland's equality legislation, Front Line Defenders recognises that it denotes a biological or scientific difference in human beings, a theory long discredited and to which the organisation does not subscribe.

² Employment Equality Act 1998 to 2011

- Disability
- Race
- Membership of the Traveller Community

1.2 Policy Aims:

The aims of our Equal Opportunity Policy are:

- To promote equality of opportunity throughout the organisation, the employment of staff, the involvement of interns and volunteers and the membership of the Board of Trustees and other committees as may be determined.
- To eliminate all forms of discrimination, including direct, indirect and discrimination by association, in the workplace by implementing policies, strategies and procedures which promote equality of opportunity.
- To identify and remove barriers and redress any imbalances which prevent equality of opportunity.
- To prevent discrimination in any form, whether direct or indirect, against current or prospective staff, interns and volunteers.
- To ensure that we fulfil our obligations under equality legislation.
- To engage in best practice in relation to equal opportunities.

2. Employment Policy

- 2.1 It is the policy of Front Line Defenders that the principles and practices of equality of opportunity should apply to all conditions of service to our staff, including: recruitment, placement, selection, promotion, career development, training, pensions, pay and special leave entitlements.
- 2.2 No employee will be intimidated, discriminated against or treated less favourably for taking or supporting an action under equality legislation including: raising a concern, complaining or assisting in an investigation.
- 2.3 All employees are required to comply with this policy and are responsible for ensuring its practical application. A breach of the Equal Opportunities Policy will be treated as misconduct under the organisation's disciplinary procedures.

3. Promotion of Equal Opportunities

- 3.1 To ensure that all Front Line Defenders staff are aware of their obligations and rights under the Equal Opportunities policy, a system of policy implementation, information provision and training will be provided as required.

- 3.2 Front Line Defenders will ensure that the employment equality policy is communicated throughout the organisation, to all staff, interns, volunteers, contractors, agents, suppliers and other relevant third parties in a range of formats through various media as deemed appropriate.
- 3.4 This policy will be displayed in the workplace and made accessible to all staff as part of the Staff Terms and Conditions of Employment, and interns as part of the intern policy. The policy will also be available on the shared drive of the computer network and available on the website – www.frontlinedefenders.org
- 3.5 We are committed to undertaking positive action across all the named grounds to promote equality of opportunity for all people in the workplace.
- 3.6 We will keep the addition of further grounds open to review.

4. Equality Training

- 4.1 Staff, interns and volunteers will be encouraged, where possible and relevant, to attend training days / conferences on equality issues.
- 4.2 Training, information and briefings in relation to equality of opportunity will be provided to staff, interns and volunteers, as necessary. Training will be organised in a manner that is equally open, available and accessible to all staff, interns and volunteers.

5. Policy Monitoring and Responsibility

- 5.1 Day-to-day responsibility for equality matters will rest with the Deputy Director.
- 5.2 The Deputy Director is responsible for monitoring the effectiveness of the Equal Opportunities Policy within the organisation in order to:
- Ensure the policy is communicated to all staff and interns.
 - Ensure that a clear statement of Front Line Defenders' commitment to equal opportunities and practices is clearly visible in all areas of the centre.
 - Consult staff, interns and volunteers where appropriate on issues relating to equal opportunities.
 - Provide information and training to all staff, interns and volunteers to ensure their understanding and commitment to the implementation and use of this policy.
 - Provide human resources and managerial support on any issues/queries arising out of this policy.
 - Identify and implement any positive action programmes as they arise to ensure equality of opportunity.
 - Provide informal and confidential mechanisms of reporting to those who feel that they have been treated unfairly in the context of this policy.
 - Provide a formal mechanism in the form of the grievance procedure contained in the Staff Terms and Conditions handbook as a means to formally investigate an alleged unfair treatment in the context of this policy.

6. Recruitment and Advertising

- 6.1 Recruitment and selection of suitably qualified staff and interns will be made from the widest possible field; positions will be advertised internally and externally.
- 6.2 Front Line Defenders reserves the right to conduct internal recruitment competitions, in line with this policy and the Staff Terms and Conditions.
- 6.2 It is our policy to avoid displaying, intentionally or unintentionally, advertisements or wordings that suggest, implicitly or explicitly, that positions are not open to candidates from all the grounds covered by this policy.
- 6.3 All advertisements for employment, internships and volunteer positions with Front Line Defenders and all information sent out to applicants for such posts will state clearly that: "Front Line Defenders is an Equal Opportunities Employer and welcomes applications from all sections of the community."
- 6.4 Advertisements should not be confined to those websites and/or publications that exclude or disproportionately reduce the number of applicants on any of the named grounds. Where feasible, recruitment advertisements will be placed in specialist websites and/or publications aimed at groups that work with individuals from all named grounds.
- 6.5 All recruitment application forms will conform with all of the provisions of the Employment Equality Acts, 1998 to 2011 and to best practice in equal opportunities.

- 6.6 Front Line Defenders staff will be included as appropriate in the development of employment equality policies in relation to recruitment and advertising of jobs and their accessibility to people with different disabilities.
- 6.7 We will seek to ensure a creative approach in our advertising that affirms diversity and attracts the widest pool of applicants.
- 6.8.1 We will keep our public relations and communications under review to ensure they are aligned with our employment equality policy.
- 6.9 Front Line Defenders will take a periodic review of the recruitment process to ensure that no direct or indirect discrimination exist.

7. Interview and Selection Process for Staff Positions

- 7.1 Front Line Defenders will ensure that the organisation's recruitment and selection procedures outlined below are consistent, provide equality of opportunity and are seen as fair by all staff and job applicants.
- 7.2 Individuals will be selected for employment based on merit. Job applicants must not be treated less favourably on any of the grounds covered by this policy, or be put at a disadvantage by unjustifiable conditions or requirements.
- 7.3 We will conduct recruitment interviews on the basis of ability, so that all candidates of equal merit have an equitable opportunity to compete.
- 7.4 We will strive to ensure a balance of persons from within all the grounds and to achieve gender balance on all our interview boards. In addition, we will provide all members of interview panels with detailed guidance/training in non-discrimination and equal opportunity issues in relation to recruitment.
- 7.5 We are committed to an agreed objective system of rating candidates for recruitment by experience, skill, qualifications, or job record as appropriate and relevant.
- 7.7 A person specification will be drawn up for each employment and volunteer position to be filled describing: the experience, skills, qualifications and knowledge required to carry out the job satisfactorily. This will ensure that before the recruitment process begins, clear criteria are agreed upon by which all applicants are assessed.
- 7.8 Written documentation will be maintained of the assessments made on applicants during the interview process for at least 12 months following the distribution of notices to unsuccessful candidates. The written record for the successful candidate will be placed in the personnel file.
- 7.9 Short-listing for interviews will be based upon job related criteria.
- 7.10 We will make appropriate adjustments to the recruitment process that will enable candidates, with or without disabilities, to compete equally for jobs.
- 7.11 We will identify contact points to ensure that we have ongoing access to the knowledge

required to make reasonable accommodation for people with disabilities.

- 7.12 Any candidate who feels that she / he has been unlawfully discriminated against has a right of complaint which can be exercised by writing to the Board of Trustees. All such complaints of alleged discrimination will be fully investigated by management in accordance with best practice procedures and appropriate actions will be taken where necessary.

8. Orientation / Induction

- 8.1 Front Line Defenders is committed to make all new staff, interns and volunteers feel welcome and will provide all the assistance needed for a smooth workplace induction.
- 8.2 We will introduce a pro-active equality approach in orientation programmes for new staff, interns and volunteers, as well as, undertaking awareness raising and equality skills training activities with existing staff.
- 8.3 All volunteer induction materials will state explicitly that volunteering policies are covered by the Front Line Defenders equality policies.
- 8.4 We will take steps to ensure that staff, interns and volunteers, for whom English is not their first language, understand workplace rules and procedures.
- 8.5 The Deputy Director will explore necessary adjustments with staff, interns or volunteers who have disabilities to access any necessary advice or support and to secure implementation of such adjustments.
- 8.6 Staff, interns and volunteers will be provided with information to increase their understanding of adaptations and adjustments required in the process of recruitment and the continued employment of staff with disabilities.

9. Training and Staff Development

- 9.1 It is the policy of Front Line Defenders to encourage retention and professional development of staff, interns and volunteers within the organisation regardless of their gender, marital status, family status, religious belief, race, age, sexual orientation, disability, or membership of the Traveller community.
- 9.2 We are committed to monitoring the promotion process where feasible to assess the equality of opportunity in this area.

10. Work – Life Balance

- 10.1 Consistent with the justifiable needs of the work, efforts will be made to enable staff to reconcile work with domestic responsibilities and choices.
- 10.2 Front Line Defenders provides initiatives to support work-life balance through, for example:
- Adoptive, maternity and paternity leave
 - Flexible working hours, part-time working, reduced contractual hours
 - Career breaks, special leave, carer's leave, parental leave
- 10.3 Reasonable effort will be made within existing arrangements to enable staff with particular cultural and religious needs to reconcile their work and private life.
- 10.4 Staff who avail of family-friendly work arrangements will not be discriminated against and will be treated equally with other staff.

11. Performance Management and Organisational Planning

- 11.1 Performance management and organisational planning meetings will be conducted on a basis that is non-discriminatory to all staff. Performance management shall be based on an individual's capabilities, performance or evidence of potential.
- 11.2 To ensure equality between all staff, the principle and practice of equal pay will be respected and kept under review. Front Line Defenders believes that staff should receive equal pay for the same or broadly similar work, for work that rates as equivalent and for work of equal value.
- 11.3 We shall take steps, where appropriate, that staff for whom English is not their first language, understand all disciplinary and related procedures.

12. Sexual Harassment / Harassment³

- 12.1 Front Line Defenders believes that all people have the right to be treated with dignity and respect and in no way discriminated against, sexually harassed or harassed in the course of their work.

³ Please note that the procedures for investigating sexual harassment and harassment are the same as for the Bullying Policy and Procedure, found in the Front Line Defenders Staff Terms and Conditions.

12.2 Discrimination is defined as the treatment of a person in a less favourable way than another person is, has been or would be treated in a comparable situation on any of the nine protected grounds.

In addition to direct, overt discrimination, other forms are also covered by this policy:

Indirect discrimination happens where there is less favourable treatment in effect or by impact. It happens where people are, for example, refused employment or training not explicitly on account of a discriminatory reason but because of a provision, practice or requirement puts people who belong to one of the grounds covered by the policy at a particular disadvantage, except where the provision is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

Discrimination by Association happens where a person associated with another person (belonging to a specified ground) is treated less favourably because of that association.

12.2 Front Line Defenders is committed to ensuring that the workplace is free from sexual harassment and harassment.

12.3 This policy applies to all staff, interns, volunteers, contract workers, programme participants, vendors and members representing Front Line Defenders.

12.4 The policy extends beyond the workplace to conferences and training and may extend to work-related social events.

12.5 We will ensure that complaints will be treated with fairness and sensitivity and in as confidential a manner as possible.

12.6 Victimisation of any party to a complaint, or of an employee / non – employee who takes action, supports action or gives notice of intention to take / support an action under equality legislation in relation to sexual harassment or harassment will be subject to disciplinary action.

12.7 Sexual harassment and harassment by staff and non-staff such as contract workers, volunteers, programme participants and business contacts **will not be tolerated** and could lead to disciplinary action (in the case of staff) and other sanctions, for example the suspension of contracts or services or the exclusion from premises (in the case of non-staff).

12.8 No employee will be treated less favourably because he/she has rejected, tolerated or accepted the sexual harassment or harassment (e.g. The fact that an individual has previously agreed to the behaviour does not stop him/her from deciding that it has now become unwelcome).

12.9 It is the responsibility of the employee to decide what behaviour is unwelcome, irrespective of the attitude of others to the matter.

12.10 To ensure this policy is effective, Front Line Defenders will:

- Provide a good example by treating all persons in the course of their work with courtesy and respect.

- Promote awareness of the organisation's policy and complaints procedures through dissemination of equality bulletins, newsletters and training as appropriate.
- Be vigilant for signs of harassment and take action before a problem escalates.
- Respond quickly and sensitively to an employee who makes a complaint of harassment. We will handle all complaints in as confidential a manner as possible.
- Explain the procedures to be followed if a complaint of sexual harassment or harassment is made. We will provide all staff and volunteers with copies of this procedure.
- Ensure that an employee making a complaint is not victimised for doing so.
- Monitor and follow up the situation after a complaint is made so that the sexual harassment or harassment does not recur.

13. Sexual Harassment

13.1 Sexual harassment is defined as any:⁴

- unwelcome act of physical intimacy
- unwelcome request for sexual favours
- other act or conduct including spoken words, gestures or the production, display or circulation of written words, pictures or other material that is **unwelcome** and could reasonably be regarded as **sexually offensive, humiliating or intimidating**.

13.2 Many forms of behaviour can constitute sexual harassment. It includes examples like those contained in the following list, although it must be emphasised that the list is illustrative rather than exhaustive. A single incident may constitute sexual harassment.

13.2.1 **Physical conduct of a sexual nature** - This may include unwanted physical contact such as unnecessary touching, patting, pinching or brushing against another person's body, assault and coercive sexual intercourse.

13.2.2 **Verbal conduct of a sexual nature** - This includes sexual advances, offensive flirtations, suggestive remarks, innuendos or lewd comments. Propositions or pressure for sexual activity and continued suggestions for social activity outside the workplace (after it has been made clear that such suggestions are unwelcome or unwanted) also constitute verbal conduct of a sexual nature.

13.2.3 **Non-verbal conduct of a sexual nature** - This may include the display of pornographic or sexually suggestive pictures, objects, written materials, emails, text-messages or faxes. It may also include leering, whistling or making sexually suggestive gestures.

13.2.4 **Sex-based conduct** - This would include conduct that denigrates, ridicules, intimidates or is physically abusive to an employee because of his or her sex such as derogatory or degrading abuse or insults that are gender-related.

⁴ Section 13 -Code of Practice on Sexual Harassment and Harassment at Work – Equality Authority

14. Harassment

- 14.1 Harassment is any act or conduct including spoken words, gestures or the production, display or circulation of written words, pictures or other material if the action or conduct is unwelcome to the staff and could reasonably be regarded as offensive, humiliating or intimidating.⁵

⁵ Section 14-Code of Practice on Sexual Harassment and Harassment at Work – Equality Authority

14.2 The harassment is based on the relevant characteristic of the staff whether it is the employee's:

- **Gender** – A man, woman or a transsexual person.
- **Civil Status** – Single, married, separated, divorced, widowed, civil partners and former civil partners.
- **Family status** – A parent of a person under 18 years or the resident primary carer or a parent of a person with a disability.
- **Sexual orientation** – Heterosexual, homosexual, lesbian or bisexual orientation.
- **Religious belief** (or no belief) - Different religious belief, background or outlook or none.
- **Age** – This includes persons over the age of 18
- **Disability** – Broadly defined includes people with physical, intellectual, learning, cognitive or emotional disabilities and a range of medical conditions.
- **Race** – Includes race, skin colour, nationality or ethnic origin.
- **Membership of the Traveller Community** – People who are commonly called Travellers, who are identified both by Travellers and others as people with a shared history, culture, traditions and historically a nomadic way of life on the island of Ireland.

14.3 The protection of the Act extends to situations where the employee does not have the relevant characteristic but the harasser believes that he/she has that characteristic, for example, if the harasser thought the employee was gay and the employee wasn't.

14.4 Many forms of behaviour may constitute harassment including:

- Verbal harassment - jokes, comments, ridicule or songs
- Written harassment - including faxes, text messages, emails or notices
- Physical harassment - jostling, shoving or any form of assault
- Intimidating harassment - gestures, posturing or threatening poses
- Visual displays such as posters, emblems or badges
- Isolation or exclusion from social activities
- Pressure to behave in a manner that the employee thinks is inappropriate, for example being required to dress in a manner unsuited to a person's ethnic or religious background.

15. Common Elements

- 15.1 The definitions of sexual harassment and harassment have several common concepts.

Unwelcome conduct

The Employment Equality Act does not prohibit all relations of a sexual or social nature at work. To constitute sexual harassment or harassment the behaviour complained of must firstly be unwelcome. It is up to each employee to decide (a) what behaviour is unwelcome, irrespective of the attitude of others to the matter and (b) from whom, if anybody, such behaviour is welcome or unwelcome, irrespective of the attitudes of others to the matter. The fact that an individual has previously agreed to the behaviour does not stop him/her from deciding that it has now become unwelcome. It is the unwanted nature of the conduct that distinguishes sexual harassment and harassment from friendly behaviour that is welcome and mutual.

- 15.2 The intention of the perpetrator of the sexual harassment or harassment is irrelevant. The fact that the perpetrator has no intention of sexually harassing or harassing the employee is no defence. The effect of the behaviour on the employee is what is important.
- 15.3 Staff, interns and volunteers of Front Line Defenders may contribute to achieve an environment free from sexual harassment and harassment through cooperation with management. Sexual harassment and harassment by staff, interns or volunteers constitutes misconduct and may lead to disciplinary action.
- 15.4 Any acts of sexual harassment and/or harassment by non-staff such as contract staff, programme participants and business contacts will not be tolerated and may lead to termination of contracts or suspension of services, or the exclusion from a premises or the imposition of other sanctions (as appropriate).⁶

16. Policy Promotion

- 16.1 Front Line Defenders will endeavour to ensure that this policy is communicated effectively to all management, staff, interns, volunteers, service users, project users and other business contacts, including those who supply and receive goods and services.
- 16.2 Front Line Defenders will display this policy on notice boards.
- 16.3 Front Line Defenders is committed to monitoring incidents of sexual harassment and harassment. Information will be used to evaluate the policy and procedures at regular intervals.
- 16.4 Front Line Defenders will endeavour to arrange for regular training on the prevention of sexual harassment, harassment and bullying for managers, staff and interns/volunteers.
- 16.5 New staff, interns and volunteers will be trained at induction or through appropriate awareness raising initiatives.
- 16.6 Any complaints of sexual harassment or harassment must be taken seriously and handled in a sensitive, supportive manner. Moreover, any retaliation or retribution of any kind against a person who complains about sexual harassment or harassment is strictly

⁶ Section 15 – Code of Practice on Sexual Harassment and Harassment at Work – Equality Authority

forbidden. Where a complaint has been found to be made falsely and maliciously, however, the disciplinary procedure shall be imposed upon the person(s) who made the complaint.

17. Complaints Procedure

17.1 Any complaint of sexual harassment and/or harassment will be treated in as confidential a manner as possible. All complaints will be handled through the official grievance procedure.

17.2 An employee will not be victimised or subject to sanction for making a complaint in good faith, or for giving evidence in proceedings, or by giving notice of intention to do so.

17.3 Types of Complaints:

Informal: An employee, intern, volunteer, member, contract staff, service user or project user who is being sexually harassed or harassed, should first attempt to resolve the problem informally if this is possible. The individual should explain clearly to the person engaging in the unwanted conduct that the behaviour in question is not welcome, that it offends them or makes them uncomfortable. This is likely to produce solutions that are speedy, effective, and minimise embarrassment and the risk of breaching confidentiality.

If a person finds it difficult to approach the alleged perpetrator directly, then the individual should seek help and advice on a confidential basis from a colleague, his/her line manager or the Deputy Director.

Having consulted with a colleague, line manager or the Deputy Director, the complainant may request the assistance of that colleague, line manager or Deputy Director in raising the issue with the alleged perpetrator(s). In this situation, the approach of the consulted colleague/ line manager/ Deputy Director should be by way of a confidential, non-confrontational discussion with a view to resolving the issue in an informal, low-key manner.

A complainant may decide, for whatever reason, to bypass the informal procedure. Choosing not to use the informal procedure will not reflect negatively on a complainant in the formal procedure. It is recognised that it may not always be practical to use the informal procedure, particularly where the bullying is serious or where the people involved are at different levels in the organisation. In such instances, the individual should use the formal mechanism set out below.

Formal: If the problem continues or it is not appropriate to resolve the problem informally, (for example, because of the severity of the harassment) it will be necessary to process the complaint through the grievance procedure outlined below.

Complaints should be made to her/his line manager or the Deputy Director as soon as possible. Where the line manager or the Deputy Director is involved as alleged harasser or as victim, the complaint should be made to the Executive Director. Where the Executive Director is involved as alleged harasser or victim, the complaint should be made to the Chairperson of the Board of Trustees. If the complainant believes that it would not be appropriate to make a complaint to any member of the management team, s/he should discuss the matter with the Chairperson of the Board of Trustees with a view to establishing an effective method of making a complaint.

In the interests of natural justice, the alleged harasser will be notified in writing of the nature of the complaint, given a copy of the allegation, informed of his or her right to representation and will be given every opportunity to rebut the detailed allegations made.

18. Investigation of Complaints

- 18.1 Front Line Defenders will ensure that the investigation of any complaint is handled with sensitivity and with respect for the rights of both the complainant and the alleged harasser. A written record will be kept of all meetings and investigations.
- 18.2 The investigation will be handled in an independent and objective manner.
- 18.3 No fewer than two people, who have been appropriately trained to conduct an investigation in a sensitive and objective manner, will carry out an investigation of the complaint. The investigators shall be agreed by union and management where appropriate.
- 18.4 Front Line Defenders will strive to ensure that any investigative panel has gender balance where appropriate.
- 18.5 The complaint shall be in writing. Both parties will be given full details in writing of the nature of the complaint as well as the response, including written statements and any other documentation or evidence, including witness statements, interview notes or records of meetings held with the witnesses.
- 18.6 The alleged harasser will be given time to consider the documentation and an opportunity to respond.
- 18.7 Separate hearings for both parties to the complaint shall be held, as well as with any witnesses. Both parties have the right to be accompanied and/or represented, by a representative, friend or colleague.
- 18.8 Confidentiality will be maintained to the greatest extent in keeping with a fair investigation.
- 18.9 The investigation, having considered all of the evidence before it and the representations made to it, will produce a written report to both parties outlining its findings and the reasons for its final decision. The report should be prepared citing the details of the complaint, the response of the alleged harasser, the results of the investigation and the conclusion, and a copy should be sent to both the complainant and the alleged harasser. Both parties will be given the opportunity to comment on the conclusions of the investigation team.
- 18.10 If the examiner(s) conclude that there is not enough evidence to sustain the allegation of harassment or sexual harassment, both parties must be informed as soon as possible that the matter will not proceed any further.
- 18.11 If the allegation is sustained, the examiners will report their findings, including recommended appropriate disciplinary measures, to the Executive Director, who is responsible for making a final decision and communicating it in writing to the line manager and both parties. In cases involving the Executive Director, the findings of the report will be filed with the Chairperson of the Board of Trustees, who shall make the final decision and report it to the relevant line manager and both parties.
- 18.12 Disciplinary action shall be taken in sustained complaints in line with the organisation's disciplinary procedures. Regular checks will be made by one of the investigators to ensure that the bullying has stopped and that there has been no victimisation for referring a complaint in good faith. Retaliation of any kind against an employee for complaining or taking part in an investigation concerning bullying at work is a serious disciplinary offence

18.13 If the complaint is upheld against a non-employee, the report will recommend appropriate sanctions that could extend to:

- Exclusion of the individual from premises
- Suspension or termination of service
- Suspension or termination of a supply service or other contract

19. Appeals Procedure

19.1 If the complainant wishes to appeal the Executive Director's decision, an appeal can be brought to the Chairperson of the Board of Trustees who will consider the findings and subsequent solutions with the aim of resolving the complaint. Should the complaint involve the Executive Director, the appeal should be made to some other member of the Board of Trustees who has not been involved with the initial complaint or an independent third party to be appointed by some other member of the Board of Trustees who has not been involved with the initial complaint.

20. Disciplinary Procedure

20.1 See Front Line Defenders' Disciplinary Procedures in the Staff Terms and Conditions.

21. Further Information

21.1 All questions relating to the execution or interpretation of this policy and procedures contained within it should be referred to the Deputy Director.

22. Policy Review

This policy shall be reviewed annually. The next review will take place in 2017.