

# Dignity at Work and Study Policy

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<b>13. If this policy has been reviewed, has this resulted in a minor or major changes?</b>	Major – new policy

Always view the current version of the document via the Knowledge Exchange Policy Hub.

## Modifications from previous version of document

Version	Date of issue	Details of modification
1.0	TBC	New Policy
1.1	TBC	Revised following legislation changes
1.2	Aug 25	Eversheds Legal Review

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## **1. Introduction and Context**

- 1.1. The Liverpool School of Tropical Medicine (LSTM) is committed to creating a great place to work and study, in which the principles of respect, dignity, and inclusion are part of our everyday goals and behaviours.
- 1.2. This policy describes LSTM's commitment to creating and maintaining a culture which supports our community to thrive and flourish. It underpins our belief that everyone has the right to work and study in a safe, dignified, and inclusive environment.
- 1.3. LSTM has a duty to uphold the principles of freedom of speech and academic freedom within the law. Nothing in this policy infringes on or impedes the fulfilment of this duty.
- 1.4. This Dignity at Work and Study Policy does not operate in isolation and links with other LSTM policies, procedures and codes of practice that share its aim, detailed in [Appendix C](#) (staff) and [Appendix D](#) (students) of this document.

## **2. Equity and Diversity**

- 2.1 LSTM is committed to promoting equity of opportunity, combatting unlawful discrimination, and promoting good community relations. We will not tolerate any form of unlawful discrimination or behaviour that undermines this commitment and is contrary to our equity policy.
- 2.2 LSTM believes that everyone from all backgrounds has the right to be protected from all forms of harm. LSTM has a zero-tolerance policy for staff, students and organisational representatives committing any type of exploitation, abuse, discrimination or harassment
- 2.3 This policy required an Equity Impact Assessment, and the assessment is at the end of this policy document.

## **3. Safeguarding**

- 3.1 The Liverpool School of Tropical Medicine (LSTM) believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. LSTM will not tolerate abuse and exploitation by staff or associated personnel.

- 3.2 LSTM recognises its role in safeguarding and protecting our staff, students, volunteers and other representatives as well as the beneficiaries, research participants, patients and communities with whom we have direct and indirect contact through our work. LSTM has a zero-tolerance policy for staff and organisational representatives committing any type of harm, exploitation, abuse or harassment.
- 3.3 Safeguarding principles are integral to our approach to our policies and procedures. This policy document reflects our organisational commitment to keeping children and vulnerable adults safe, including our staff and students

## **4. Scope**

- 4.1 The principles of this policy apply to employees, students and anyone who comes into contact with LSTM, for example, collaborative partners, contractors and consultants, honorary appointments, volunteers, partners, and other visitors.
- 4.2 This is an LSTM Group policy. For the purposes of this policy, the LSTM Group shall include IVCC, WTC and all subsidiaries, Where LSTM is used in this document, it should be read as referring to all LSTM Group companies save for any variations highlighted. Where an LSTM specific role or committee is referred to, it should be read as referring to the equivalent role/committee within the LSTM Group company.
- 4.3 This policy applies to all employees of LSTM Group, regardless of employer.
- 4.4 The LSTM Group is a global employer and endeavours to write policies that apply to all its employees. Where local employment law or regulations require a different approach, the HR department will advise managers and colleagues.
- 4.5 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## **5. Dignity at Work and Study**

- 5.1 LSTM requires all members of our community to treat each other with respect, courtesy, and consideration at all times. Every member of the LSTM community has the right to expect respectful behaviours from others and the responsibility to behave correspondingly. Everyone is encouraged to challenge or raise concerns relating to behaviours which are contrary to this policy.

- 5.2 LSTM does not tolerate bullying, harassment and/or victimisation within the workplace, extended workplace, and study environments. LSTM will investigate formal complaints and take appropriate action on all complaints observed and/or brought to our attention. Legitimate, reasonable, and constructive criticism of a colleague's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.
- 5.3 We will ensure all prospective colleagues and students are aware of the behaviours expected of them before they join LSTM through our code of conduct. The expectations communicated through the code of conduct will continue throughout their time with LSTM.
- 5.4 We will provide training for staff, managers, and long-term students (i.e., PGR) and managers in playing their part in creating an inclusive culture, including (but not limited to):
- Mandatory e-learning modules for all staff & Students, refreshed on a regular basis,
  - Sessions focusing on specific issues or behaviours relating to creating an inclusive environment (e.g., microaggressions and being an active bystander),
  - Training for managers on their responsibilities for maintaining an inclusive culture in their teams.
  - Specialist training for those involved in the investigation or hearing of complaints related to Dignity at Work and Study
  - Dedicated training for colleagues who are Dignity and Respect Champions.

## **6. Raising Concerns**

- 6.1 Everyone at LSTM has a part to play in maintaining a culture which supports our community to thrive and flourish. Therefore, we strongly encourage and will support all members of the LSTM community to report any incidences of unacceptable behaviour towards them or that they witness.
- 6.2 Colleagues and students can raise concerns informally or formally, to a manager, a member of HR, Academic Registrar or through the independent external reporting mechanism (Vault): this route also supports anonymous reporting. In addition, a team of trained Dignity & Respect Champions and Safeguarding Focal points are a confidential point of contact for anyone considering raising a complaint. They can provide information and signpost to support and resources but will not investigate the concerns.
- 6.3 We will not condone unacceptable behaviour or ignore reports. All concerns reported will be treated seriously, including anonymous reports, those made by witnesses to unacceptable behaviour, and management concerns. All

concerns will be investigated promptly, sensitively, fairly, in a timely manner, providing support to all parties throughout.

- 6.4 LSTM will take appropriate action against colleagues who threaten, attempt or act in any way to stop reporting or whistleblowing.

## 7. Dealing with Complaints

- 7.1 We do not believe that the burden of reporting should solely lie with the individual who has directly experienced unacceptable behaviour. Everyone in the LSTM community has a responsibility to report concerns and we encourage these to be raised in a timely manner (ideally within 3 months following the incident).
- 7.2 Where complaints are made anonymously via the independent external reporting mechanism, LSTM will take action such as training, briefings and updating policies and monitoring patterns of behaviour. However anonymous reporting restricts the ability to investigate or initiate proceedings against named individuals. LSTM recognises that in some cases, complainants may be concerned about revealing their identity to a respondent and will put steps in place to provide protection and support.
- 7.3 Investigations will normally be undertaken in accordance with the *Raising and Resolving Dignity at Work (for staff) and Study (for students) Concerns Procedure*. Investigation into complaints of misconduct may also be conducted under the relevant Disciplinary Policy, e.g., where a complaint has been raised by a witness, a pattern of unacceptable behaviour has been identified, or the organisation believes it is appropriate to do so (this list is not exhaustive).
- 7.4 During any investigation, after raising a concern, LSTM would not normally grant anonymity to any participant in the formal process, except in extreme circumstances e.g., where there is a serious risk to safety. In such circumstances, LSTM may be able to protect the complainant's identity from other parties during any investigation or formal process however this cannot be guaranteed. Complainants would need to provide their details to HR/the investigating officer to discuss appropriate steps, and provide support, and implement any steps to maintain safety.
- 7.5 In situations when LSTM is obliged to act, anonymity is not guaranteed for example, Risk of Health and Safety, Safeguarding concerns, and any other statutory requirements.
- 7.6 We will assess the risk to all parties involved in or directly affected by the complaint/report, as well as any risk to our wider colleague and student communities and take appropriate actions.
- 7.7 We may invite external consultants to take part in investigation and/or disciplinary panels if we feel it is appropriate, based on the nature of the concerns raised.

- 7.8 Following an investigation, where complaints of unacceptable behaviour are upheld, and there is a case to answer, a case may be brought under the LSTM Disciplinary Policy and Procedure for colleagues and could lead to a formal warning or, for serious cases, dismissal. For students, this will be dealt with under the LSTM Student Disciplinary Code and may lead to the student(s) being required to withdraw from the programme.
- 7.9 Complaints raised in a global context may require a different approach to take account of cultural sensitivities, individual needs and varying legal frameworks. All complaints will be dealt with in a manner which upholds the guiding principles of this policy, and which is appropriate for the circumstances and context. Separate guidance will be developed for LSTM's strategic hubs; individual complaints will be dealt with on a case-by-case basis.
- 7.10 Further details on how we will respond to complaints can be found in the following documents:
- [Procedure for Raising and Resolving Dignity at Work Complaints \(staff\)](#)
  - [Raising and Resolving Dignity at Study Concerns Procedure \(Students\)](#)
- 7.11 Complaints or concerns raised in relation to Sexual Harassment and/or Sexual Misconduct against staff or students should be reported in accordance with the process set out within the Sexual Harassment Policy and LSTM will respond to and deal with those complaints in accordance with the process set out within that Policy. Students can also find further guidance about reporting on the LSTM website ([single comprehensive source of information](#)).

## 8. Other

- 8.1 Some acts of Unacceptable Behaviour may amount to a criminal offence. If a complaint is made that may amount to a criminal offence support will be offered via the HR Representative to report a matter to the police if they choose to do so.
- 8.2 The complainant's wishes should always be respected: if they choose not to report then in the vast majority of cases, this will be respected. In a small number of exceptional circumstances, LSTM may determine that the matter should be reported, e.g., where the personal safety of the complainant or others is at risk. This decision will only be taken in conjunction with the Global HR Director and the Safeguarding Lead.

- 8.3 We will not use NDAs (non-disclosure agreements) or confidentiality clauses that prevent members of the LSTM community from speaking out about harassment or other unacceptable behaviour. We wish to ensure that all our colleagues and students are safe and supported and would consider the use of confidentiality clauses in such circumstances to be wholly unacceptable.
- 8.4 LSTM takes complaints of bullying, harassment, and victimisation seriously. Complaints which are found to be frivolous, vexatious, or malicious may be dealt with under LSTM's Disciplinary Procedure.

## **9. Monitoring**

- 9.1 We will report the anonymised outcome of concerns/reports raised and feedback lessons learned to LSTM Executive Group, Safeguarding Oversight Committee, E&I Committee (and relevant subsidiary committees) on a regular basis.
- 9.2 Our Human Resources team will monitor the effectiveness of the policy and review our approach as necessary.

## Appendix A - Definition of Terms

### 1. Unacceptable Behaviour

- 1.1. Unacceptable behaviour will typically involve actions, words or physical gestures that could reasonably be expected to cause another person distress or discomfort. It will include (but is not limited to) behaviour that amounts to harassment, microaggressions, bullying, victimisation and discrimination, as defined below.
- 1.2. Behaviour may be perceived as unacceptable even if there was no intent to cause offence. Equally, behaviour which has this intent is unacceptable, no matter the effect it has on the targeted individual(s). Behaviour may also be unacceptable where it is not directed at the individual it offends.
- 1.3. Unacceptable behaviour may arise from a single act or it may arise from a pattern of repeated behaviours in which individual incidents may be deemed acceptable, but which taken together, breach the bounds of acceptability.
- 1.4. It can take the form of physical, verbal, and non-verbal conduct, including via on-line, mobile phones and cameras and via social and other forms of media.
- 1.5. Examples of unacceptable behaviour can be found in Appendix B. However, in assessing whether one or more acts constitute unacceptable behaviour, LSTM will consider all the circumstances surrounding the complaint.
- 1.6. For the purposes of this policy, and to be clear, the following will not normally constitute unacceptable behaviour:
  - 1.6.1. Management requests and instructions carried out in a reasonable manner,
  - 1.6.2. legitimate, constructive, and fair feedback relating to performance or behaviour
  - 1.6.3. reasonable actions in relation to performance and conduct, either taken informally or through disciplinary, capability or other formal procedures.
  - 1.6.4. A complaint brought under the Dignity at Work and Study policy, which is brought in good faith, even if unfounded
- 1.7. When applying this definition of Unacceptable Behaviour, LSTM will do so in a manner which is consistent with the Freedom of Speech Principles as set out below. It will have particular regard to, and place significant weight on, the importance of freedom of speech within the law, academic freedom and tolerance for controversial views.

## 2. Harassment

Harassment means any of the following:

### 2.1. Harassment (under the Equality Act 2010)

- Unwanted conduct related to a relevant protected characteristic\*, which has the purpose or effect of violating another person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.
- Unwanted conduct of a sexual nature which has the purpose of violating another person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.
- Unwanted conduct (by person A) of a sexual nature or conduct that is related to gender reassignment or sex which has the purpose or effect of violating another person's (persons B's) dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for B and, because of B's rejection of or submission to the conduct, A treats B less favourably than they would have been had B not rejected or submitted to the conduct.

*\*The relevant protected characteristics are:*

- *age;*
- *disability;*
- *gender reassignment;*
- *race;*
- *religion or belief;*
- *sex;*
- *sexual orientation*

### 2.2. Harassment (under the Protection from Harassment Act 1997)

- Harassment arises where a person pursues a course of conduct\* which they know or ought to know amounts to harassment of another and which:
  - harasses one other person on at least two occasions;
  - or harasses two or more persons on at least one occasion in relation to each person.

Reference to a course of conduct includes speech and references to harassment of a person include alarming the person or causing the person distress.

- 2.3 In deciding whether conduct has the effect referred to above, consideration must be given to the perceptions of the complainant, the other circumstances of the case and whether it is reasonable for the conduct to have that effect.
- 2.4 Under our definition we also understand harassment to include, domestic violence and abuse (which can also involve control, coercion, and threats) and stalking experienced by an individual. (for any Safeguarding concerns, please refer to LSTM's Safeguarding Policy)
- 2.5 We would also consider harassment to include any incidents of physical violence towards another person(s) on the basis of a protected characteristic and hate crimes, such as those criminal offences, which are motivated by hostility or prejudice, based on a person's disability or perceived disability (not all of which are visible); race or perceived race; or religion or perceived religion; sexual orientation or perceived sexual orientation, or gender identify or perceived gender identity.
- 2.6 Sexual misconduct is defined within the Sexual Harassment, Sexual Misconduct and Victimisation Policy as meaning any unwanted or attempted unwanted conduct of a sexual nature and includes but is not limited to: a) Sexual harassment; b) Sexual assault; c) Rape.
- 2.7. Racial harassment is defined as an incident or a series of incidents intended or likely to intimidate, offend or harm an individual or group because of their ethnic origin, colour, race, religion or nationality.

### **3 Microaggressions**

- 3.1 Microaggressions are subtle 'everyday' verbal or non-verbal behaviours, whether intentional or unintentional, which communicate hostile, derogatory, or negative messages, based on protected characteristics (see 2.1).
- 3.2 Examples of microaggressions could be:
- Assuming that an individual is not from the country you're based in due to their skin colour or accent,
  - Making assumptions of how someone will/should be or behave based on stereotypes,
  - Assuming that work experience or qualifications gained outside the country you are from are superior/inferior,
  - Making statements about groups of people based on a stereotype.
  - Refusing to address an individual by their preferred pronouns when this has been made clear.
  - This list is not exhaustive.

## 4 Bullying

- 4.1 Bullying is defined by [ACAS](#) as “*offensive intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.*” Power does not always mean being in a position of authority but can include personal strength and the power to coerce through fear or intimidation. Bullying is a form of abuse that can make a person feel fearful, vulnerable, upset, humiliated, undermined, or threatened.
- 4.2 Bullying behaviour can be directed at others regardless of their role relative to the person displaying the bullying behaviours within a formal structure. Bullying behaviour can be directed at individuals at the same level, a lower level, or a higher level within the formal structure, by an individual towards a group of people, or a group of people towards an individual.
- 4.3 Bullying can take the form of physical, verbal, and non-verbal conduct. Bullying may include:
- Physical or psychological threats,
  - Overbearing and intimidating levels of supervision,
  - Inappropriate derogatory remarks about someone's performance,
  - Gaslighting – subtle, manipulating behaviour intended to control an individual or situation which leads to feelings of being undermined, excluded and loss of trust impacting confidence and performance.
  - This list is not exhaustive.
- 4.4 The management of performance, including legitimate, reasonable, and constructive criticism of an individual's performance or behaviour, or reasonable instruction given in the course of employment will not amount to bullying on their own.

## 5 Victimisation

- 5.1 Victimisation refers to subjecting someone to a detriment because they have complained or given information about discrimination or harassment or supported someone else's complaint. It also applies if the detrimental treatment arises from a belief that the individual intends to complain or provide information but has not yet done so.
- 5.2 Detrimental treatment of a complainant or a witness to a complaint brought under this policy, may be considered to be victimisation.

## **6 Discrimination**

- 6.1 Discrimination can be direct or indirect.
- 6.2 Direct discrimination is defined by the Equality Act 2010 as the less favourable treatment of a person because of a protected characteristic (see 2.1) that:
- They possess (ordinary direct discrimination),
  - That is possessed by someone they are associated with (direct discrimination by association), or
  - They are thought to have (direct discrimination by perception).
- 6.3 Indirect discrimination is where a provision, criterion or practice is applied equally to a group of employees but has the effect of putting those who will share a certain protected characteristic (see 2.1) at a particular disadvantage when compared to others without the characteristic in the group and this cannot be lawfully justified.

## **7 Freedom of Speech Principles**

- 7.1 LSTM is committed to upholding, promoting and protecting academic freedom and freedom of speech within the law across its community. Central to this is a strong presumption in favour of permitting lawful speech, even where topics may be difficult, contentious or discomfiting, recognising that higher education must be a space for open, critical and inclusive debate.
- 7.2 LSTM works on the assumption(unless provided with evidence to the contrary) that it is unlikely to amount to harassment if students are exposed to any of the following in the course of their studies: the content of higher education course materials, including but not limited to books, videos, sound recordings, and pictures; and, statements made and views expressed by a person as part of teaching, research or discussions about any subject matter which is connected with the content of a higher education course
- 7.3 While individuals are free to express their views within the law, LSTM expects all members of its community to engage in discourse respectfully, acknowledging and being sensitive to the diverse backgrounds and perspectives of others. Whilst LSTM has a duty to protect freedom of speech within the law, it will not protect unlawful speech.
- 7.4 Please see Freedom of Speech Code of Practice for full details of or policy.

## Appendix B – Examples of Unacceptable Behaviour

Below are examples of behaviour which could be considered by LSTM to be unacceptable. The lists are not intended to be exhaustive.

- Deliberate exclusion from meetings, communications or activities without good reason.
- Sending emails, displaying, circulating or creating material containing offensive content including emails, text messages, video clips and images sent by mobile phone or posted on the internet
- Preventing individuals progressing by intentionally blocking promotion or training opportunities without legitimate reason
- Wearing clothing or accessories with objectively offensive motifs, slogans, suggestive phrases, or images
- Unreasonable work demands and deliberately setting impossible targets
- Making it unnecessarily difficult for colleagues to conform to their religion or beliefs
- Refusing to work with someone or isolating them e.g., because of a protected characteristic (whether actual or perceived) or because of their connection with someone with that protected characteristic
- Aggressive, abusive, threatening or offensive behaviour including shouting and personal insults
- Spreading rumours or malicious lies
- Actual or threatened disclosure of a protected characteristic, e.g., sexual orientation or trans status
- Unwanted comments on dress and/or appearance, including where this is linked to ethnicity, culture and/or religion
- Continued suggestions for social activity after it has been made clear that such suggestions are unwelcome
- Making verbal threats
- Using humour to put another person or group of people down, or telling offensive jokes
- Making threats or comments about job security without foundation

### Physical

- Unwanted physical conduct or “horseplay”, including touching or the invasion of personal space (getting too close)
- Inappropriate practical jokes
- Physical abuse and/or exploitation
- Persistent unwelcome contact including text messages, emails, phone calls, gifts
- Spying, stalking, or pestering
- Damaging, defacing, or removing another person’s property

## **Appendix C - Policies and Documents (Staff)**

- Procedure for Raising and Resolving Dignity at Work Complaints
- LSTM Disciplinary Policy and Procedure
- LSTM Code of Conduct
- LSTM Protecting Children and Vulnerable Adults Policy and Procedure
- LSTM Safeguarding Students Policy
- LSTM Acceptable Use of Computer and IT Facilities
- LSTM Sexual Harassment Policy
- LSTM Relationship Policy
- Freedom of Speech Code of Conduct

## **Appendix D – Policies and Procedures (Students)**

- Raising and Resolving Dignity at Study Concerns Procedure
- LSTM Student Complaints Procedure
- LSTM Student Charter
- LSTM Code of Conduct
- LSTM Safeguarding Policy (Protecting Children & Adults at Risk)
- LSTM Safeguarding Students Policy
- LSTM Acceptable Use of Computer and IT Facilities
- LSTM Student Disciplinary Code
- LSTM Regulations for Postgraduate Taught and Postgraduate Research degrees
- LSTM Sexual Harassment Policy
- LSTM Relationship Policy

## Equity Impact Assessment (EIA)

(Please refer to the [EIA guidance document](#))

### Equity Impact Assessment: Section 1 (to be completed for all Policies)

<b>Title of policy/process:</b>	<i>Dignity at Work and Study Policy and accompanying Raising and Resolving Dignity at Work Concerns Procedure.</i>
<b>Policy owner job title:</b>	<i>Head of People Services</i>
<b>Date of EIA:</b>	<i>21<sup>st</sup> January 2022 and 5<sup>th</sup> September 2022, 12<sup>th</sup> September 2023, 10<sup>th</sup> September 2025</i>
<b>Policy relevant to: Staff / students / visitors etc:</b>	<i>All members of the LSTM community</i>
<b>Summary of any consultation with stakeholders (e.g. date and type of consultation):</b>	<i>N/A – organisation-wide consultation took place in Summer 2023</i>
<b>This policy has been checked for accessibility on: (date)</b>	<i>21<sup>st</sup> January 2022 and 5<sup>th</sup> September 2022, 12<sup>th</sup> September 2023 &amp; 10<sup>th</sup> September 2025</i>

<b>I confirm that this policy does/does not impact people, and therefore does not require an EIA (delete as appropriate)</b>	<b><u>Does</u> impact people <i>(continue to Section 2)</i></b>
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**Section 2: To be Completed if your policy has an impact on people, or if you are unsure of the impact of a Policy or Procedure and need to engage with stakeholders (note: you do not need to use this template – only use it if it’s helpful)**

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
1.1	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on a group depending on their ethnicity?	Yes (positive)	<p><i>States that colleagues of all ethnic groups must be treated with dignity and respect.</i></p> <p><i>Colleagues from ethnic minorities may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <li>• <i>Trained Dignity &amp; Respect Champions will be made available to provide colleagues with information on how to report.</i></li> <li>• <i>Our BAME staff network can support colleagues.</i></li> <li>• <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i></li> <li>• <i>External panel members may be used where this is appropriate.</i></li> <li>• <i>Collect &amp; analyse EDI data to identify the</i></li> </ul>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
				<i>disproportionate number of complaints and outcomes affecting groups from marginalised backgrounds.</i>
1.2	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on a group depending on their gender?	Yes (positive)	<p><i>States that colleagues of all genders must be treated with dignity and respect.</i></p> <p><i>Colleagues may experience unacceptable behaviour related to their gender.</i></p>	<ul style="list-style-type: none"> <li>• <i>Trained Dignity &amp; Respect Champions will be made available to provide colleagues with information on how to report.</i></li> <li>• <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i></li> <li>• <i>External panel members may be used where this is appropriate.</i></li> </ul>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
1.3	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people during <i>pregnancy or maternity</i> ?	Yes (positive)	<p><i>States that everyone must be treated with dignity and respect.</i></p> <p><i>Colleagues may be more likely to experience unacceptable behaviour during pregnancy and/or maternity.</i></p>	<ul style="list-style-type: none"> <li>• <i>Trained Dignity &amp; Respect Champions will be made available to provide colleagues with information on how to report.</i></li> <li>• <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i></li> <li>• <i>External panel members may be used where this is appropriate.</i></li> </ul>
1.4	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people with disabilities?	Yes (positive and possible negative)	<p><i>States that all colleagues must be treated with dignity and respect, regardless of any disability.</i></p> <p><i>Additional support during the procedure may be required for colleagues with a disability or long-term health condition.</i></p>	<ul style="list-style-type: none"> <li>• <i>Requirement under UK law for reasonable adjustments to be made - see sections 2.8 of procedure. HR team will liaise with colleagues who have requested additional support.</i></li> <li>• <i>Trained Dignity &amp; Respect Champions will be made</i></li> </ul>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
			<i>Colleagues with disabilities may be more likely to experience unacceptable behaviour.</i>	<p><i>available to provide colleagues with information on how to report.</i></p> <ul style="list-style-type: none"> <li>• <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i></li> <li>• <i>External panel members may be used where this is appropriate.</i></li> </ul>
1.5	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people due to their <i>sexual orientation</i> ?	Yes (positive)	<p><i>States that colleagues of all sexual orientations must be treated with dignity and respect.</i></p> <p><i>Colleagues from the LGBTQ+ community may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <li>• <i>Trained Dignity &amp; Respect Champions will be made available to provide colleagues with information on how to report.</i></li> <li>• <i>Our LGBTQ+ staff network can support colleagues.</i></li> <li>• <i>Anonymous reports can be made through our Freedom to Speak Up mechanism.</i></li> </ul>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
				<ul style="list-style-type: none"> <li>External panel members may be used where this is appropriate.</li> </ul>
1.6	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people due to their <i>religion, belief, or lack thereof</i> ?	Yes (positive)	<p><i>States that colleagues must be treated with dignity and respect regardless of any or no religion or belief.</i></p> <p><i>Colleagues with certain religions or beliefs may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <li>Trained Dignity &amp; Respect Champions will be made available to provide colleagues with information on how to report.</li> <li>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</li> <li>External panel members may be used where this is appropriate.</li> </ul>
1.7	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people who are <i>trans</i> ?	Yes (positive)	<p><i>States that trans colleagues must be treated with dignity and respect.</i></p> <p><i>Trans colleagues may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <li>Trained Dignity &amp; Respect Champions will be made available to provide colleagues with information on how to report.</li> </ul>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
				<ul style="list-style-type: none"> <li>• <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i></li> <li>• <i>External panel members may be used where this is appropriate.</i></li> </ul>
1.8	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people due to their <i>age</i> ?	Yes (positive)	<p><i>States that colleagues of all ages must be treated with dignity and respect.</i></p> <p><i>Younger and older colleagues may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <li>• <i>Trained Dignity &amp; Respect Champions will be made available to provide colleagues with information on how to report.</i></li> <li>• <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i></li> <li>• <i>External panel members may be used where this is appropriate.</i></li> </ul>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
1.9	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people due to <i>marriage or civil partnership</i> ?	Yes (positive)	<i>States that intrusive questioning about a person's marital status is unacceptable behaviour</i>	

Ref.	Other groups who could be impacted (acquired characteristics)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
2.1	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people due to their <i>contract type (part-time or full-time)</i> ?	Yes (positive)	<i>The policy and procedure cover all colleagues, regardless of their contract type.</i>	
2.2	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on people due to their <i>contract status (fixed-term or indefinite)</i> ?	Yes (positive)	<i>The policy and procedure cover all colleagues, regardless of their contract status.</i>	
2.3	Is it likely that the policy or framework <b>could</b> have a	Yes (positive)	<i>The policy and procedure cover all colleagues, regardless of their grade.</i>	

Ref.	Other groups who could be impacted (acquired characteristics)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
	positive or negative impact on people due to <i>their grade</i> ?			
2.4	Is it likely that the policy or framework <b>could</b> have a positive or negative impact on <i>people with dependents or caring responsibilities</i> ?	Yes (positive)	<i>The policy and procedure cover all colleagues, regardless of their dependents or caring responsibilities.</i>	

## Conclusion

<p>a. What issues are highlighted by the EIA process? Summarise the action you will take to mitigate against them, or how you've changed your policy to remove the issues.</p>	<p>Reasonable adjustments may need to be made for colleagues with a disability or long-term health condition to support accessing the procedure. This is recorded in the <i>Raising and Resolving Dignity at Work Concerns Procedure</i> and will be facilitated by the HR department.</p> <p>Trained Dignity &amp; Respect Champions will be available to all colleagues to provide information on how to report.</p> <p>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</p> <p>External panel members may be used where this is appropriate during investigation of complaints and any subsequent disciplinary process.</p> <p>Risk assessments will be made when complaints are received to support colleagues.</p>
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<p>b. If you consider intersectionality of protected characteristics, are the issues compounded? Summarise the action you will take to mitigate against the issues.</p>	<p>Colleagues may experience unacceptable behaviour relating to more than one protected characteristic.</p> <p>The actions stated in section a. of this EIA (above) will apply.</p>
<p>c. Are there are groups of people who aren't recorded so far, who may be adversely impacted by this policy/framework?</p>	<p>No</p>
<p>d. Are there any opportunities within the policy/framework to particularly promote equity?</p>	<p>The aim of the policy and procedure is to promote dignity for all at LSTM and provide processes for issues to be dealt with in a supportive manner.</p>
<p>e. Does the policy/framework need amendment after the outcome of the EIA process?</p>	<p>No, however will be reviewed again after organisation-wide consultation.</p>
<p>f. Timeline for amendment, review, and further consultation with key stakeholders.</p>	<p>Consultation took place in summer 2023 with staff.</p>
<p>g. Any additional comments</p>	<p>N/A</p>

**Once Section 1 & 2 are completed, copy, and paste into your policy template, with any confidential or restricted data (or identifying numbers of individuals [<5]) redacted, to allow for sharing of good practice across the school via the internal Policy Hub. Please ensure you refer to job roles and group names, and not individual's names.**

**Please share the final document with [inclusion@lstmed.ac.uk](mailto:inclusion@lstmed.ac.uk) prior to internal publication.**