



Whittington Hospital NHS Trust

Harassment, Bullying and Victimisation Grievance Procedure

Version:	Revision to a current policy
Ratified by:	EC
Date ratified:	
Name of originator/author:	Neil Edgar
Name of responsible committee/individual:	
Date issued:	
Review date:	August 2011
Target audience:	All staff

Key Words:

Bullying and harassment
Dignity and respect
Equal opportunities

Harassment, bullying and victimisation grievance procedure

April 2009

To be reviewed April 2011

Statement of intent

The Whittington Hospital is an equal opportunities employer and is committed to providing a working environment free from discrimination, harassment and bullying of any kind, and to upholding the dignity of individuals at work. It is the right of **everyone** to be treated fairly and with respect. Each employee has a responsibility to behave in a way which achieves this. The hospital expects that all working relationships will be characterised by mutual trust and respect. Any kind of behaviour which undermines this trust and respect is unacceptable to the hospital.

The Whittington Hospital has a legal duty to prevent unlawful discrimination. This covers harassment or bullying which may be defined as discrimination as covered by legislation

The hospital recognises that it is liable, together with its employees, for any act of harassment by its staff.

The policy has been agreed by the JCC and the relevant hospital management group

Policy

The aim of this policy is to ensure that the Whittington is able to:

- provide a trustworthy and supportive mechanism for raising such issues as bullying and harassment without fear of reprisal, recrimination and victimisation
- deal with any complaints of alleged bullying and harassment as quickly and locally as possible.

This policy applies to all staff, contractors and employees of other organisations who are on site, volunteers, visitors and patients.

Definitions

It is important to clarify the distinction between the terms bullying and harassment as this is an area which causes much confusion. The Advisory, Conciliation and Arbitration Service (ACAS) definitions help clarify the terms:

- Harassment, in general terms, is unwanted conduct affecting the dignity of men and women in the workplace
- It may be related to age, sex, race, disability, religion, sexual orientation, nationality or any personal characteristic of the individual, and may be persistent or an isolated incident

- The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient
- Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient
- Bullying or harassment may be by an individual against an individual (including by someone in a position of authority such as a manager or supervisor) or involve groups of people.
- It may be obvious or it may be insidious.

Whatever form it takes, it is unwarranted and unwelcome to the individual

Victimisation is defined as an act of discrimination or harassment against a person because it is known or suspected that they have made an allegation of discrimination/harassment or given evidence or information relating to the allegation.

Any employee who intimidates or victimises another employee for making a complaint or for assisting in an investigation will be subject to disciplinary action themselves which could result in dismissal.

The term harassment is used within the remainder of the policy to cover discrimination, harassment, bullying and victimisation.

Examples of unacceptable behaviour which can be considered to constitute harassment:

- Bullying by exclusion: this may take the form of social isolation and/or exclusion from meetings
- The deliberate withholding of information with the intention of affecting a colleagues performance
- Unfair and destructive criticism
- Intimidating behaviour
- Verbal abuse and the spreading of rumour
- Humiliation or ridicule
- Setting of unrealistic targets which are unreasonable, malicious and/or changed with limited notice or consultation

This list is not exhaustive

The effects of harassment and bullying

The Trust is aware that harassment and bullying at work can have adverse effects on the individual. It can cause fear, insomnia, stress, anxiety, depression, physical sickness, and loss of confidence, reduced self-esteem amongst employees. It may also put a heavy strain on personal and family life. It can lead to increased absenteeism, an apparent lack of commitment, poor performance and even resignation. For the employer the result is not just poor morale but poor team working, an increase in accidents and injuries at work, higher staff turnover, reduced productivity, and lower efficiency.

Responsibility of staff and managers

All staff have a personal responsibility for their own behaviour and for ensuring they comply with this policy. There are a number of things that staff can do to help prevent harassment such as:

- Set a positive example by treating others with respect (refer to appendix 2 Dignity and Respect nine-point plan)
- Be aware of the trust's policy and comply with it
- Do not make personal comments
- Do not accept behaviour that may be offensive when directed against you or others, and take positive action to ensure that it is challenged and/or reported
- Be supportive of colleagues who may be subject to bullying and harassment

All managers have a responsibility to implement this policy and to bring it to the attention of their staff in order to establish and maintain a work environment free of harassment. They must:

- Treat a complaint seriously and deal with it promptly and confidentially, giving the employee and the alleged perpetrator full support during the whole process
- Set a positive example by treating others with respect and setting standards of acceptable behaviour – thereby promoting a working environment where harassment is unacceptable and not tolerated. All managers should ensure their own behaviour could not be construed as bullying and harassment by acting with fairness and equity.

The differences between a manager who is firm but fair and a manager who is bullying and harassing staff can be misunderstood. Examples – which are not exhaustive – are given in the table below:

Firm but fair manager	Bullying or harassment
Consistent and fair	Aggressive, inconsistent and unfair
Determined to achieve the best results, but reasonable and flexible	Unreasonable and inflexible
Knows their own mind and is clear about their own ideas, but willing to consult with colleagues and staff before drawing up proposals	Believes that they are always right, has fixed opinions, believes they know best and not prepared to value other people's opinions
Insists upon high standards of service in quality of and behaviour in the team	Insists upon high standards of service and behaviour but blames others if things go wrong
Will discuss in private any perceived deterioration before forming views or taking action and does not apportion blame on others when things go wrong	Loses temper, regularly degrades people in front of others, threatens official warnings without listening to any explanation
Asks for people's views, listens and assimilates feedback	Tells people what is happening, does not listen

Procedure

By having a separate procedure for harassment, the hospital recognises that such grievances can be of a particularly personal and sensitive nature and by having clear and specific guidelines in dealing with complaints it is hoped suffering can be lessened for all those involved. Complaints should normally be raised within three months of the alleged incident.

Individual members of staff should remember that no matter how bad things appear to be and how isolated they may feel, they should speak to someone they feel they can trust about any bullying or harassment to which they are being subject.

If the alleged perpetrator is a service user, customer or member of the public, rather than a work colleague, you can expect the same level of support from the Whittington. You should report such incidents to your line manager, or seek help from the Human Resources Department.

Bullying and harassment may be treated as a disciplinary offence and, where allegations are founded, may lead to disciplinary action up to and including dismissal.

Disciplinary action may also be taken if a complaint is found to have been made maliciously or in bad faith.

1. Informal resolution

It is important, if an individual is facing harassment that they talk to someone. They should not worry that they will be labelled a troublemaker for making a complaint. Such complaints will be taken seriously and investigated, focusing primarily on the effect the harassment has had on the individual rather than the actions of the harasser. The hospital actively encourages anyone who feels they have been the subject of harassment to talk to their manager, or a more senior manager or if they feel this is not possible - then to their human resources manager or their Trade Union or Staff Side representative. Staff may also - or indeed instead - want to talk to one of the hospital's Workplace Harassment Advisers (see appendix 3). The hospital's confidential counselling service, Oasis, is also available for advice and mediation services. Further sources of information and advice are detailed in Appendix 4 .

Harassment is taken very seriously and anyone who is found guilty of harassing another employee, after an investigation has been conducted, faces disciplinary action, which may lead to dismissal.

Whenever possible, an employee who believes that he/she has been the subject of harassment should in the first instance ask the person responsible to stop the harassing behaviour. Depending on the circumstances, it may be appropriate for another individual i.e. the Human Resources Manager/Advisor or Line Manager/Supervisor to talk to the person responsible for the harassing behaviour on the recipient's behalf, with their agreement.

The complainant can have a Trade Union representative or friend present at all stages of the procedure.

As an alternative to pursuing a formal case, staff may wish to try to resolve difficulties at work using the trust's mediation services providing both parties agree to this approach.

Staff who decide to participate in mediation do so on a purely voluntary basis and all of the discussions that take place are entirely confidential. Solutions are not imposed but have to be agreed by those involved and will have to be within the parameters of normal trust rules, guidelines, policies and procedures. No notes or records of discussions are retained by the mediator whose role is that of an impartial facilitator.

2. Formal complaint (see appendix 1 for a step by step guide)

If informal attempts to resolve the situation have not been successful or if the individual feels that the acts complained of may not be resolved informally, this may be raised with your line manager, your trade union representative, or a human resources manager, who will advise on the next steps, for example, a formal investigation.

A decision to conduct a formal investigation should be made by a senior manager jointly with a senior human resources manager.

Where an investigation is deemed appropriate, it should be conducted independently by a nominated manager (e.g. from outside the department) and a human resources representative and allow the appropriate involvement of trade union representation of the individuals involved.

Where a formal investigation is not deemed appropriate the individual will be given the reason as to why this decision has been taken. It may be at this stage other action is suggested.

If following investigations, it appears that harassment/misconduct has occurred, the investigating officer will recommend the appropriate course of action to be taken. A detailed response will be given to both parties outlining the results of the investigation and what action, if any, is being taken in respect of the complaint.

A meeting will be convened between the Senior Manager, the senior HR representative and the complainant with their trade union representation if required, to discuss the outcome of the complaint

The complainant may appeal, stage 3 - grievance procedure, if it is felt that the process of investigation and subsequent application, or not, of the disciplinary procedure has been unfairly or poorly carried out or agreed. There should be no appeal allowed to the complainant against the perceived severity or leniency of the disciplinary action taken.

The alleged harasser may appeal (again stage 3 grievance procedure) if it is felt that the process of investigation or subsequent application of the disciplinary procedure has been unfairly or poorly carried out or agreed.

The alleged harasser should also be allowed to appeal against the perceived severity of the disciplinary action taken (c.f disciplinary procedure)

The procedure for carrying out a formal investigation is outlined in appendix 1

All employees involved with the investigation and any subsequent process are required to respect the need for confidentiality. All complaints, associated correspondence and interviews will be treated in strict confidence. Breaches in confidentiality will be subject to disciplinary action.

The use of this policy does not preclude an individual from referring their case to an employment tribunal on the grounds of race or sex or other forms of discrimination, harassment or victimisation. This policy fulfils the statutory requirements for dealing with grievances.

Employees being harassed by patients or other members of the public

Employees have the right to be treated with respect and dignity at all times. The Trust, therefore, recognises that it is unacceptable for patients or other members of the public to harass staff. All patients will be informed of this policy.

An employee who is being harassed by a patient or other member of the public is encouraged to bring it to the attention of their line manager immediately. The Trust expects line managers to attempt to resolve the situation locally. The matter should be discussed sensitively with the employee who has been harassed and agreement reached on the course of action to be taken.

For example, where a patient is harassing a nurse, it would not be acceptable simply to provide the patient with a different nurse unless specifically requested to do so by the nurse experiencing harassment.

The employee and/or line manager should consider an informal approach in the first instance. In many cases, pointing out to the harasser that the behaviour is unacceptable should be sufficient to stop the problem without the need for further action.

When the situation cannot be resolved informally or is of a serious nature, a more senior manager or the consultant in charge of the patient's care should be involved. The patient or member of the public should be informed in writing that their behaviour is unacceptable and that any further incidents will not be tolerated. It may be, at this stage, that visitors are warned that they will be barred from further visits to the hospital. Please refer to the Hospital's Security Policy. Security assistance can be called at any stage.

Should a further incident occur with a patient, healthcare staff should be involved in drawing up a contract with the patient. The ward manager in conjunction with their line manager who will seek specialist advice where necessary should lead this. This contract should outline the services that will be provided to the patient, the behaviour expected of the patient and the consequences of breaking the contract. It may be that, in the event of a breakdown in relationships, the Trust will have to explore the possibility of referring the patient to another unit. The patient should be requested to sign the contract and copies given to the patient as well as placed in the notes. Legal assistance can be sought through the Risk manager.

8 Review and monitoring of the policy

The director of human resources and the chair of staff side will review this policy every two years.

The director of human resources will be responsible for co-ordinating the dissemination, implementation and review of this procedure

Investigation procedure for a complaint of bullying and harassment

All cases must be treated seriously and dealt with promptly, as this will help to prevent additional stress and anxiety to both sides of the complaint. Where possible, timescales should be agreed in advance between the investigating team and the senior manager.

Step 1. Initial response:

Following receipt of a letter of complaint a senior manager and a senior HR representative will decide if a formal investigation has to be undertaken.

If a formal investigation is to be conducted then the senior manager and human resources manager will decide if the complaint should be investigated under the harassment, bullying and victimisation grievance procedure or the trust's disciplinary procedure and will advise the complainant of their decision. This decision will be kept under review and if any change is proposed the complainant and the employee under investigation will be informed.

If it is decided that a formal investigation under the harassment bullying and victimisation grievance procedure should take place then an investigating officer should be appointed and the investigation procedure below followed. This officer should be a manager from outside the department concerned.

If the investigation is being held under the disciplinary procedure then the appropriate disciplinary investigation should be conducted and the disciplinary procedure followed.

The employee should be informed within 5 working days of receipt of the letter of complaint as to whether a formal investigation is to be carried out and under which policy it will be convened – and if not why not and what action will be taken. If a formal investigation is to be instigated the complainant will be informed of who the investigating officer will be and made aware of the process that will be adopted during the investigation.

The person against whom the complaint is made should also be informed at the outset if a formal investigation is to be carried out and should be given a copy of the written complaint.

Step 2: Possible redeployment or suspension during the investigation:

The investigating manager should consider the appropriateness of redeployment or suspension for the duration of the investigation to relieve the stress and pressure on one or both parties and/or to prevent the risk of further incidents or victimisation occurring.

Suspension of the alleged harasser may be considered where the investigating officer feels that it is in the interest of either the individual, the organisation or both. It may be appropriate in some instances for both parties to be suspended. It should be made clear at all times that suspension under this procedure is not a disciplinary act and does not imply that there has been any misconduct, or that there is any suggestion of guilt. Suspension will be on full pay.

Temporary redeployment of one or both parties can also be considered. In normal circumstances it is appropriate that the alleged bully/harasser should be redeployed rather than the complainant. The complainant could, however, be offered the option of redeployment where appropriate. In some circumstances both parties may be redeployed. Any temporary redeployments will be at the same grade although there may be instances where the post into which the individual is being redeployed is at a lower substantive grade. Every effort should be made to ensure that temporary redeployment is mutually acceptable. Payment protection will apply during the period of temporary redeployment.

Step 3: Meeting with the complainant

Once appointed, the investigating manager will write to invite the complainant to an information gathering meeting. This meeting will take place as quickly as possible – normally within 10 days - they will also arrange and conduct a meeting with the complainant.

The purpose of this meeting is for the investigating manager together with HR support to take a more detailed statement of the incident(s). The complainant should be given the opportunity to nominate witnesses whom they wish to be interviewed by the investigating manager.

[A trade union official or equivalent or a friend acting in a non-official capacity if requested may accompany and assist anyone attending meetings in steps 3-6. Notes at these meetings will be taken]

Confidentiality must be maintained at all times and members of staff attending meetings should be reminded of this.

Step 4: Meeting with the person against whom the complaint has been made:

The investigating manager together with HR support will meet with the person against whom the complaint has been made and hear what they have to say about the alleged incident(s) – having previously been informed of the allegation against them.

The employee should be given the opportunity to nominate any witnesses whom they wish to be interviewed by the investigating manager.

Step 5: Meeting with the witnesses

The investigating manager, together with HR support, will meet with the witnesses nominated by both sides.

Step 6: Further clarification

The investigating manager may decide to meet any of the employees again to clarify or gain further information. He/she must ensure that they obtain any written material that may be used as evidence.

It is important to note that the purpose of the meetings outlined in steps 3-6 is to establish the facts. They are not disciplinary hearings. All those giving information will be interviewed privately and not in the presence of any other person involved in or present during the alleged incident(s). Individuals will be informed that discussions need to remain confidential to the investigation. Notes taken during these meetings will be made available to all those involved in their particular meeting and they will be given the opportunity to comment on accuracy. However witnesses will also be informed that if a disciplinary hearing is convened against the employee/s under investigation they may be required to attend as witnesses and their statements could be used in evidence.

Step 7: Consideration of information:

Having obtained all the information possible, the investigating manager and human resources representative will review the information and decide whether harassment/misconduct has occurred.

In some cases there will not be any witnesses and it will be one person's word against another's. In these cases the investigating manager and human resources representative will consider whether on the balance of probabilities the incidents/actions occurred.

Step 8: Further action:

The investigating manager and human resources representative will consider the facts and will recommend one of the following in the form of a written report to the senior manager and the senior HR representative:

1. Take no action as the allegation has not been substantiated or there is insufficient evidence to reach a conclusion
2. Proceed to disciplinary procedure as the investigation has found that there may be substance to the allegation. The manager undertaking the initial investigation will then normally be designated as the investigating officer for the disciplinary case which they will be expected to present.
3. Take alternative management action as the evidence and/or nature of the complaint does not merit use of the disciplinary procedure. This could include but is not limited to:
 - A recommendation for a facilitated discussion/counselling for both parties – through the services of, for example, Oasis
 - A recommendation for redeployment of one or both parties, either on a permanent or a temporary basis – normal protection rules in accordance with the pay protection policy would apply
 - Setting up arrangements to monitor the situation
 - Mandatory attendance on training courses (such as equality and diversity)

- Use of the disciplinary procedure against the complainant as the investigation felt that the complaints had been made maliciously or in bad faith
- Other recommendations regarding the situation if these are felt to have a direct bearing on the complaint having arisen.

Step 9 – informing the complainant of the outcome – Meeting

The senior manager and senior HR representative will review the report received. The senior manager following advice from HR will decide what action to take. A summary should be sent to the complainant who will be invited to a meeting to discuss the outcome. The senior manager and the senior HR representative will meet with the complainant and a trade union representative if requested.

If, following this meeting, the complainant is not satisfied with the outcome of the investigation they have recourse to the grievance procedure (see above).

The senior manager will contact the person the complaint is about to inform them of the outcome and any further action.

Steps 3 to step 9 should normally be completed within four weeks

The Whittington Hospital 
NHS Trust

Dignity and respect, what it means for patients, carers and staff at this hospital:

- *Giving clear, honest information*
- *Being polite and speaking calmly*
- *Providing privacy and asking permission*
- *Treating problems confidentially*
- *Treat others as we or our relatives would wish to be treated*
- *Actively listening to what people have to say*
- *Praising staff when they do well and support them when things don't go right*
- *Talk through problems with people*
- *Everyone is accountable for their own performance for which they should be respected*

The Whittington Hospital

Workplace harassment advisers

All employees have the right to work in an environment that is free from harassment, bullying or victimisation of any kind. Harassment, bullying and victimisation in the workplace will not be tolerated.

It is recognised that can it be an extremely upsetting time if you feel that you are being harassed or bullied at work and a workplace harassment advisers may be someone you feel you can turn to for help.

Harassment advisers are there:

- *to provide a “listening space” - creating an opportunity for staff to talk about what is happening to them without judgement*
- *to give policy guidance – helping staff understand their rights and responsibilities within agreed hospital policies*
- *to offer support in helping staff decide for themselves what action they want to take to resolve the situation*

Harassment advisers are current members of staff who have volunteered to become advisers. They have been trained in basic counselling skills and will receive on-going support to help them to provide an effective service to staff.

How do I contact the service?

You are free to choose which adviser you wish to contact.

Please contact an adviser by sending them an e-mail (0900-1700 Monday to Friday) to their work e-mail address outlining clearly that you want them to contact you in their role as harassment adviser. If they are not available, you should receive an out-of-office e-mail and should then approach another adviser.

The adviser will contact you once they have received your message to offer you an appointment of up to an hour which will be arranged at your mutual convenience. Advisers cannot discuss issues or offer advice on the telephone.

Please remember that advisers are providing this service while carrying out their normal workload and will not normally be able to offer time immediately.

It is very important for you to know that this service is completely confidential. Workplace advisers will not give your name or any information about you to anyone outside the workplace adviser service unless it is felt someone's personal safety is at

risk. If you want any more information on this, please ask your workplace adviser when you first meet with them.

Who are the advisers?

- Mary Field - PA to Directors
- Nicola Wright - Senior Physiotherapist
- Vicky McManus - HR Adviser
- Noel O'Connor - Charge Nurse (Emergency Department)
- Breege Gilbride - Clinical Lead Nurse (Critical Care Services)
- Rekha Desai - Administrator (Risk Management)

Although the hospital hopes that there is little or no harassment happening in the hospital – and therefore little use of the service will be necessary – it is recognised that harassment and bullying can occur. The service is there for you if you feel you are being harassed. Please make use of it if you think it will help you.

If you have any questions on the service, please give Neil Edgar (Ext. 5282) or Cathy Abrey (Ext. 5718) a call. They are both based in the Human Resources Department.

Dignity at Work: Harassment, bullying and victimisation policy

Advice can also be sought from:

ACAS (Advisory, Conciliation and Arbitration Service)

Head office

Brandon House

180 Borough High Street

London SE1 1LW

Web Site: www.acas.org.uk

Helpline: 08457 47 47 47

ACAS Equality Direct Helpline

Tel: 08456 00 34 44

The Commission for Racial Equality

St Dunstan's House

201 - 211 Borough High Street

London SE1 1GZ

Web Site: www.cre.gov.uk

Tel 020 7939 0000

The Disability Rights Commission

DRC Helpline

Freepost MID 02164

Stratford-upon-Avon CV37 9BR

Web Site: www.drc.org.uk

Tel: 08457 622 633

Textphone: : 08457 622 644

The Equal Opportunities Commission

Arndale House

Arndale Centre

Manchester M4 3EQ

Web Site: www.eoc.org.uk

Helpline: 0845 601 5901

Trades Union Congress

Congress House

Great Russell Street

London WC1B 3LS

Web Site: www.tuc.org.uk

Tel: 020 7636 4030

Other useful websites

Department of Trade and Industry

Website covers in detail the points of employment law including equality legislation and maternity rights. Web Site: www.dti.gov.uk/employment

Multifaithnet

Details the cultural differences and customs of different religions. Can help employers understand the different requirements of various religions. Web Site: www.multifaithnet.org

LAGER

Organisation promoting the rights of Lesbian and Gay people in the workforce aims to reduce discrimination and provides training on issues of sexual orientation.

Tel: 020 7704 6066 (for gay men) 8066 (for lesbians)

Stonewall

Works to achieve legal equality and social justice for lesbians, gay men and bisexual people.

Web Site: www.stonewall.org.uk Tel: 020 7593 1850

Age Positive

Web Site: www.agepositive.gov.uk

**The Whittington Hospital
Harassment, Bullying and Victimisation Grievance Procedure
Equality Impact Assessment Tool**

To be completed and attached to any procedural document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:	no	
	Race		
	Ethnic origins (including gypsies and travellers)		
	Nationality		
	Gender		
	Culture		
	Religion or belief		
	Sexual orientation including lesbian, gay and bisexual people		
	Age		
	Disability - learning disabilities, physical disability, sensory impairment and mental health problems		
2.	Is there any evidence that some groups are affected differently?	no	
3.	If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?		
4.	Is the impact of the policy/guidance likely to be negative?	no	
5.	If so can the impact be avoided?		
6.	What alternative are there to achieving the policy/guidance without the impact?		
7.	Can we reduce the impact by taking different action?		

If you have identified a potential discriminatory impact of this procedural document, please refer it to director of human resources together with any suggestions as to the action required to avoid/reduce this impact.

Appendix A - Checklist for the Review and Approval of Procedural Document

To be completed and attached to any document which guides practice when submitted to the appropriate committee for consideration and approval.

	Title of document being reviewed:	Yes/No/Unsure	Comments
1.	Title		
	Is the title clear and unambiguous?	yes	
	Is it clear whether the document is a guideline, policy, protocol or standard?	yes	
2.	Rationale		
	Are reasons for development of the document stated?	Revision of existing policy	
3.	Development Process		
	Is the method described in brief?	No – revision of existing policy	
	Are people involved in the development identified?	yes	JCC
	Do you feel a reasonable attempt has been made to ensure relevant expertise has been used?	yes	
	Is there evidence of consultation with stakeholders and users?	As above	
4.	Content		
	Is the objective of the document clear?	yes	
	Is the target population clear and unambiguous?	yes	
	Are the intended outcomes described?	yes	
	Are the statements clear and unambiguous?	yes	
5.	Evidence Base		
	Is the type of evidence to support the document identified explicitly?	Revision of	

	Title of document being reviewed:	Yes/No/ Unsure	Comments
		existing policy	
	Are key references cited?	na	
	Are the references cited in full?	na	
	Are supporting documents referenced?	na	
6.	Approval		
	Does the document identify which committee/group will approve it?	yes	Normal hr route to JCC and then hospital management
	If appropriate have the joint Human Resources/staff side committee (or equivalent) approved the document?	yes	
7.	Dissemination and Implementation		
	Is there an outline/plan to identify how this will be done?	yes	Director of hr
	Does the plan include the necessary training/support to ensure compliance?	n/a	
8.	Document Control		
	Does the document identify where it will be held?	yes	Normal hr route
	Have archiving arrangements for superseded documents been addressed?	yes	
9.	Process to Monitor Compliance and Effectiveness		
	Are there measurable standards or KPIs to support the monitoring of compliance with and effectiveness of the document?	no	Normal hr monitoring
	Is there a plan to review or audit compliance with the document?	no	However bullying and harassment cases are recorded
10	Review Date		
	Is the review date identified?	yes	2011

	Title of document being reviewed:	Yes/No/Unsure	Comments
	Is the frequency of review identified? If so is it acceptable?	yes	
11	Overall Responsibility for the Document		
	Is it clear who will be responsible for co-ordinating the dissemination, implementation and review of the documentation?	yes	Director of HR

Individual Approval			
If you are happy to approve this document, please sign and date it and forward to the chair of the committee/group where it will receive final approval.			
Name		Date	
Signature			
Committee Approval			
If the committee is happy to approve this document, please sign and date it and forward copies to the person with responsibility for disseminating and implementing the document and the person who is responsible for maintaining the organisation's database of approved documents.			
Name		Date	
Signature			

Acknowledgement: Cambridgeshire and Peterborough Mental Health Partnership