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Participating with dignity in all CIEP events and activities

The CIEP Dignity Policy

Community director
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1 Foreword

It is the CIEP's aim that all of our events and activities should be welcoming to and inclusive of all of our members – members from across the world, who bring with them valuable and diverse lived experiences and cultural norms.

While the CIEP is not directly responsible for the behaviour of its members, it is responsible as an association for the spaces in which its members meet and interact – both in person and online – and it has other legal responsibilities as an employer and service provider.

As such, we are working to embed equality, diversity and inclusion (EDI) across all of the CIEP's activities. As part of that work, this policy on participating with dignity in all CIEP events and activities sets out our expectations of members, staff and other participants, as well as how we will deal with complaints of harassment, victimisation, bullying and/or other unacceptable behaviours.

By outlining these expectations, the CIEP aims to foster an environment in which all members are empowered and able to participate in any and all of the CIEP's events and activities, including our annual conference and regional mini-conferences, local group meetings and other local/regional events, training (including workshops and online), member forums and social media.

This document therefore:

- sets out a statement of expectations that defines the behaviours the CIEP considers to be unacceptable, including discrimination, harassment, victimisation and bullying
- explains the ways in which you might seek support and/or report an incident should you be the target of or witness to any of these or other unacceptable behaviours
- outlines how any such complaint will be investigated and what its consequences might be
- confirms the scope of your rights to appeal and to confidentiality.

Where relevant, this document is based on and will refer to comparable procedures for complaints about members' editorial conduct under the CIEP Code of Practice. It reflects best practices set out by the Equality and Human Rights Commission (EHRC), among others, and has been reviewed as fit for purpose by the Diversity Trust.

It is framed more widely within the context of UK law and law directly applicable in the UK, including the Equality Act 2010, the Human Rights Act 1998, the European Convention on Human Rights, and the International Conventions on Civil and Political Rights, and on Economic Social and Cultural Rights, as well as

both common and criminal law in the UK, including (but not limited to) statutes such as the Serious Crime Act 2007, the Public Order Act 1986 and the Criminal Justice Act 2003.

You are invited to get in touch with the community director by email to community@ciep.uk should you have any questions about this policy and/or to suggest ways in which we might continuously improve our approach.

We thank you warmly for the professionalism and generous spirit that characterises so many of the CIEP's member-led events and activities – and we look forward to seeing you making the most of your membership by participating in them!

CIEP community director
On behalf of the CIEP Council

2 Statement of expectations

The CIEP expects everyone participating in its events and activities to treat each other with respect, both in person and online, and to be considerate and collaborative in their approach to one another. We hope that all members will feel supported and empowered to access all of the CIEP's offerings.

The CIEP will consequently take seriously any reports of unacceptable personal behaviours, which it defines as including discrimination, harassment, victimisation and bullying, as well as threats, hostility, abuse and behaviours that result in intimidation, insult or injury. In the most serious cases, the CIEP may report an incident to the appropriate authorities, eg police, ambulance service.

As a UK-based membership association, a service provider and an employer, the CIEP has a duty to ensure that its events and activities are free from any form of direct or indirect **discrimination** on grounds that include age, disability, sex, gender reassignment, marriage or civil partnership, maternity or pregnancy, race, religion or belief, or sexual orientation (the 'protected characteristics' under the Equality Act 2010). Consequently, the CIEP will not tolerate any form of harassment, victimisation or bullying of or among its members, staff or other participants in its events and activities on these grounds or any others, including (but not limited to) gender variance, neurodivergence and body type.

Harassment can be defined as 'unwanted conduct related to a protected characteristic which has the purpose or effect of violating someone's dignity or which creates a hostile, degrading, humiliating or offensive environment for someone with a protected characteristic'.¹ It does not matter whether or not a person responsible for the behaviour intended it to have such an effect; it is the perception of the person who experiences the behaviour that defines it as harassment. Harassment, including sexual harassment, may be persistent behaviour or it may be one single act. In certain circumstances, harassment is illegal and may be a police matter.

Victimisation involves treating someone less favourably because they have made a complaint about such behaviours or are supporting someone or are perceived to be supporting someone who has made such a complaint.

Bullying can be summarised as unwanted behaviour that is 'offensive, intimidating, malicious or insulting ... [aiming to] undermine, humiliate, denigrate

¹ Equality and Human Rights Commission (EHRC), 'Equality Act FAQs', available online at equalityhumanrights.com/en/equality-act/equality-act-faqs

or injure the recipient'.² It may be overt or it may be characterised by a pattern of behaviours, each of which may seem trivial, but which have a significant cumulative impact on the target. Again, it is the effect of the behaviour that is definitive.

Should you believe that you have witnessed or been subjected to any of these or other unacceptable behaviours while participating in a CIEP event or activity, please report the incident(s) in confidence to the event or activity organiser, any CIEP director or online by using the CIEP's **incident report form** (see next section).

Under UK law, the CIEP has a legal responsibility and duty of care to everyone participating in its events and activities. **If any participant is found to have engaged in unacceptable behaviours, they may be asked to leave an event or activity with any refund at the organiser's discretion.**

² Advisory, Conciliation and Arbitration Service (ACAS), 'Bullying, harassment, victimisation: what's the difference?', available online at [acas.org.uk/index.aspx?articleid=5535](https://www.acas.org.uk/index.aspx?articleid=5535)

3 Making a complaint

If, while participating in a CIEP event or activity, you have witnessed or been subjected to behaviours that you believe to be unacceptable under this policy and you would like to make a complaint, including a complaint about the behaviour of a member volunteer, member of staff or director of the CIEP, please use the route with which you feel most comfortable. **We understand that making such a complaint can be difficult and the CIEP aims to support you sensitively.**

When making a complaint, you will be asked to share details including the date, time and nature of the incident, the names of the parties involved (if you know them) and any witnesses. If you choose to make a complaint after a CIEP event or activity has ended, please do so as soon as possible and please record not only the date of the incident, but also the date on which you are reporting it.

If appropriate, you may feel able to address the behaviour directly with the person responsible. In this case, you may want to report the incident only to seek advice on how best to do this. Such a complaint will remain confidential and, unless the behaviour relates to protected characteristics or is otherwise so serious that the CIEP has a duty to investigate or report it to the appropriate authorities, further action will not normally be taken unless you request intervention or escalate the complaint.

3.1 Reporting an in-person incident

3.1.1 Reporting to the event or activity organiser

You may choose to report any behaviour that you believe to be unacceptable under this policy to the event organiser, local group coordinator or trainer at the event or during the activity or by email after the event or activity has ended.

An event organiser, local group coordinator or trainer may take summary action in the most serious of instances; in other circumstances and particularly if you report an incident to them after the event or activity, they may offer you support in the first instance and refer the complaint to a director.

If the event organiser, local group coordinator or trainer is the subject of your complaint, you should report the incident directly to any director (see 3.1.2) or online (see 3.1.3).

3.1.2 Reporting to any director

You may choose to report any behaviour that you believe to be unacceptable under this policy to any director by email or in person.

You can find the names and email addresses of all of the directors to whom you may report any such incident on the **Meet the team** page of the website. In any instance, you may reach out directly to the community director (community@ciep.uk).

If you would like to speak to a director, you can call the CIEP office on 020 8785 6155, speaking to a member of staff directly between 10am and 4pm, Monday–Friday, or leaving a message to ask that a director be put in touch with you urgently. If you express no preference, this request will default to the community director.

3.1.3 Reporting online

You may choose to report online, in writing, any behaviour that you believe to be unacceptable under this policy. In this case, you should use the CIEP's confidential **incident report form**.

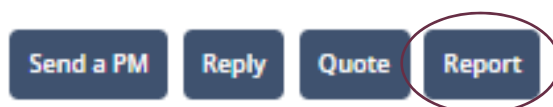
You may choose to submit this form anonymously if you want to report the behaviour but do not want the incident to be investigated.

If you do want the incident to be investigated, you must include your name and contact details, as well as the names of the parties involved, including any witnesses.

3.2 Reporting an online incident

3.2.1 Reporting on the CIEP member forums

If you are distressed by a post on the CIEP member forums that you believe to be unacceptable under this policy, you can bring it to the attention of a forum moderator by using the 'Report' button that you will find in the bottom right-hand corner of any post on any thread:



When reporting the incident, please be as clear as possible about the reason(s) why you believe the post to be unacceptable and what outcome you would like to see. The action(s) that the moderator might take in response should they agree with your assessment include deleting a post, cautioning a member in private and/or posting directly to request that members self-moderate.

If you are dissatisfied with the outcome of moderation or if you want to report the incident under this policy as part of a pattern of unacceptable behaviours, you may choose to make a complaint using the CIEP's confidential **incident report form**.

3.2.2 Reporting on the CIEP's social media

If you believe that a post, comment or tweet on the CIEP-curated social media, which include **Facebook**, **Twitter** and **LinkedIn**, is unacceptable under this policy, you can bring it to the attention of the CIEP's social media team by using direct messaging.

Please note that using a platform's own reporting function will report the comment to the platform itself and not to the CIEP's social media team. If you want the team to take action, a direct message to the CIEP page or profile will alert the team to your concerns.

If you are dissatisfied with the outcome of this intervention or if you know the user responsible for the post, comment or tweet to be a CIEP member and you want to report the incident as part of a pattern of behaviours defined as unacceptable under this policy, you may choose to make a complaint using the CIEP's confidential **incident report form**.

NB While you can report a comment made on social media by a non-member, the CIEP's action in such a case is limited to deleting the comment and blocking the user. In the most serious of cases, the CIEP may also report a comment to the appropriate authorities.

4 Investigating a complaint

The CIEP will investigate any complaint made under this policy promptly and confidentially, fairly and sensitively.

The CIEP's forum moderators and social media team are empowered to take summary action to resolve issues arising in those spaces, and they are permitted to seek advice from one or more other moderators/admins and/or one or more of the CIEP's directors before taking such action.

Event organisers, local group coordinators and trainers are also empowered to take summary action to resolve issues arising during the course of CIEP events or activities, and they are asked to report any dignity-related incident to a director as soon as possible.

Please note that the potentially sensitive nature of complaints under this policy is such that the investigating team shall not comprise independent Advanced Professional Members, as is the case of a complaints panel under the CIEP Code of Practice, but rather a team of no more than three CIEP directors.

If a complaint is made against a director or if a director has an interest in the complaint, that director will not be part of the investigating team nor will they be consulted on the team's recommendations.

The investigating team will interview all parties to the complaint, including any witnesses, either in person or remotely, by video conferencing or phone call. All parties, including any witnesses, have a right to be accompanied at any such interview(s) and also have a right to refuse to be interviewed.

The investigating team will aim to complete all such interviews as soon as possible after the incident and no later than two weeks (10 working days) after receipt of the complaint.

The investigating team will assess all evidence impartially and lawfully, making decisions by consensus where possible and simple majority otherwise.

The investigating team will consult with the full Council only in the event that they uphold the complaint and recommend action as a consequence of their investigation, in which case they will deliver, in writing, a summary report and recommendations to the Council.

The investigating team will aim to deliver its report and recommendations to the Council no later than two weeks (10 working days) after completion of all interviews and the Council shall then have a further one week (5 working days) in which to vote on these recommendations.

In line with section 6.1 of the **Complaints Procedure** under the CIEP Code of Practice, the Council may:

- fully accept the investigating team's recommendations OR
- partially accept the recommendations, suggesting its own amendments OR
- (in exceptional circumstances only) reject the recommendations and request further investigation.

In the event that the investigating team finds itself unable to uphold the complaint, all parties will be notified in writing and no further action will be recommended.

5 Consequences of a complaint

If a CIEP member or other person participating in a CIEP event or activity is summarily found to have engaged in serious unacceptable behaviours, the Council delegates to organisers the right to ask that participant to leave the event or activity and to report the incident to the appropriate authority if necessary. Any refund is at the sole discretion of the organiser(s).

Such a summary finding will follow where behaviours are witnessed and are sufficiently serious that they would commonly amount to gross misconduct in a workplace or an offence under UK law. In such circumstances, the CIEP will not hesitate to act to fulfil its legal responsibilities, including its duty of care to other members.

In other instances in which a complaint is upheld, the investigating team's recommendations will be proportionate to the severity of the incident. The likely recommendations are equivalent to those set out in section 5 of the **Complaints Procedure** under the CIEP Code of Practice, ie that the party who has been found to have behaved unacceptably be:

- given appropriate advice on how to avoid a similar complaint in the future OR
- given a written warning, to include such advice, to be held on the member's file for a period of one year or some other period as agreed by the Council OR
- given such a written warning and suspended from membership of the CIEP for a period no longer than six months OR
- expelled from the Institute.

The investigating team may propose and the Council may agree, by a simple majority vote, some other form of appropriate disciplinary action.

A member of the investigating team shall notify the parties in writing of the outcome within one week (5 working days) of the Council's decision.

In light of the gravity of the findings likely to give rise to a recommendation of expulsion, a member who has been expelled from the CIEP for reasons of discrimination, harassment (including sexual harassment), victimisation, bullying or other behaviours defined as unacceptable under this policy will not be eligible to apply to rejoin the Institute for a period of three years after any investigation or appeal is completed. In the most serious of circumstances, the Council may, by a simple majority vote, agree to extend this period.

NB Please note that lowering a member's membership grade (paragraph 5.4 of the Complaints Procedure under the CIEP Code of Practice) is not a sanction suited to complaints under this policy. Suspension of membership (paragraph

5.5) in dignity-related circumstances is not limited to Entry-Level Members but spans all membership grades.



6 Appeals

Anyone found to have engaged in unacceptable behaviours will have a right to appeal the finding (including a summary finding) and/or its consequences in writing to the CIEP Council within one month (20 working days) of the date on which they are notified of that finding and its consequences.

The member who made the complaint may likewise choose to appeal a decision should a complaint not have been upheld and no further action have been recommended.

If the investigating team has recommended and the Council has voted to implement expulsion of the member from the Institute, their membership will be suspended immediately for a period of one month (20 working days) in case the member should wish to appeal and continue in effect pending the outcome of any appeal.

As in section 7.2 of the **Complaints Procedure** under the CIEP Code of Practice, any such appeal must set out clearly the grounds on which it is being brought. In addition, if the appellant submits new evidence, they must explain why they did not make that evidence available during the original investigation.

Three directors, to include at least one of the chair or vice-chairs and all of whom must not have been part of the original investigating team, shall form the appeal team.

The appeal team will review the grounds of the appeal and any new evidence alongside the original investigating team's evidence, report and recommendations.

The appeal team will aim to deliver its report and recommendations to the Council within three weeks (15 working days) of receipt of the appeal, and the Council shall vote on the new recommendations within one week (5 working days) of receipt of the report and recommendations.

In line with section 6.1 of the Complaints Procedure under the CIEP Code of Practice, the Council may:

- reverse its original decision in full or in part OR
- uphold its original decision.

As under section 10.4 of that Procedure, if the Council votes to reverse its original decision in full or in part, this will not necessarily result in a lesser finding or a lesser recommendation. It may involve a finding where there was none before or a recommendation that the Council should impose a stronger sanction.

The chair shall notify the parties in writing of the outcome within one week (5 working days) of the Council's decision.

The Council's decision on appeal is final.

7 Confidentiality

The investigating team will take special care to protect the confidentiality of all of the parties involved in any complaint under this policy, including any witnesses. Should you be the subject of a complaint, your right to reply is not to the party making the complaint, but to the investigating team.

Any detailed records gathered or generated during the investigation shall be retained securely, in line with recommendations from the Information Commissioner's Office (ICO), for no more than three months after any investigation or appeal is completed, or for no more than six months after receipt of the report in the event that an investigation is not requested and the member has submitted the report as evidence of a pattern of behaviours, indicating that they may want to pursue a complaint at a later date.

A summary record of the consequences of a complaint that has been upheld shall be retained securely on a member's or former member's file, in line with recommendations from the ICO, for no more than three years in serious instances, including expulsion, or for some other shorter period if the Council considers that more appropriate in the specific circumstances.

All records shall be securely disposed of in line with recommendations from the ICO.

Please note that, unlike under section 13 of the **Complaints Procedure** under the CIEP Code of Practice, the sensitive nature of complaints made under this policy is such that there shall be no notification to the CIEP membership at any time.

The right to confidentiality under this policy is suspended should any behaviour be sufficiently serious that it constitutes a notifiable or other offence under UK law, in which case the CIEP will be under a duty to notify the appropriate authorities.