



# Forces Online CIO

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## Forces Online



## Harassment and Bullying Policy

Note: This policy is a 'living document' and as such it can be reviewed, revised and amended at any time to meet any changes or amendments deemed necessary to facilitate any legislative or environmental changes, however, such changes will only take place following consultation with and authorisation by the Forces Online CIO, Scotland and Northern Ireland Senior Management team.

# HARASSMENT AND BULLYING POLICY

Forces Online

<https://www.forcesonline.org.uk/promptsheet.pdf>

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## **1. INTRODUCTION AND PURPOSE**

Forces Online is committed to providing a safe, respectful, and inclusive environment for all members of our community. This includes service personnel, veterans, their families, volunteers, staff, and all individuals who engage with our organisation and services.

Harassment and bullying have no place within Forces Online. Such behaviours are not only harmful to individuals but also damage team cohesion, morale, and the overall effectiveness of our mission to support the Armed Forces community.

This policy establishes clear standards of acceptable behaviour and provides a framework for preventing, identifying, and addressing incidents of harassment and bullying. It demonstrates our unwavering commitment to creating a culture of respect, dignity, and mutual support.

The policy applies to all interactions within our organisation, including face-to-face encounters, online platforms, social media, events, and any situation where individuals are representing or associated with Forces Online.

## **2. POLICY STATEMENT**

Forces Online has zero tolerance for harassment and bullying in any form. We are committed to:

- **Creating a respectful environment** where all individuals are treated with dignity and respect, regardless of their background, characteristics, or circumstances
- **Preventing harassment and bullying** through proactive measures, clear communication of expectations, and comprehensive training
- **Responding promptly and effectively** to all reports and complaints of harassment and bullying
- **Supporting all parties involved** in harassment and bullying situations, including complainants, respondents, and witnesses
- **Taking appropriate action** against those found to have engaged in harassment or bullying behaviour
- **Protecting individuals** from retaliation for reporting harassment and bullying or participating in investigations
- **Continuously improving** our approach through regular monitoring, review, and feedback

This policy reflects our core values and commitment to the Armed Forces community we serve. It aligns with our duty of care to all individuals and our responsibility to maintain the highest standards of conduct.

### **3. SCOPE OF APPLICATION**

This policy applies to:

#### **All Individuals:**

- Forces Online staff and management
- Volunteers and supporters
- Service personnel and veterans accessing our services
- Family members and dependants
- Contractors, consultants, and external partners
- Visitors to our facilities or events
- Users of our online platforms and services

#### **All Locations and Situations:**

- Forces Online premises and facilities
- Work-related events, conferences, and social functions
- Training sessions and meetings
- Online platforms, websites, and social media
- Off-site locations when representing Forces Online
- Any situation where there is a connection to Forces Online activities

#### **All Forms of Communication:**

- Face-to-face interactions
- Telephone and video calls
- Email and instant messaging
- Social media platforms
- Written correspondence
- Online forums and discussion boards

The policy remains in effect 24 hours a day, 7 days a week, recognising that harassment and bullying can occur at any time and may have lasting impacts on individuals and the organisation.

### **4. DEFINITIONS**

#### **4.1 Harassment**

Harassment is unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

**Key characteristics of harassment include:**

- Unwanted and unwelcome behaviour
- Conduct that causes distress, alarm, or humiliation
- Behaviour that may be persistent or occur as a single serious incident
- Actions that would be considered offensive by a reasonable person

**Harassment may be related to:**

- Age, disability, gender reassignment, marriage and civil partnership
- Pregnancy and maternity, race, religion or belief
- Sex, sexual orientation, or any other personal characteristic
- Military service, rank, or veteran status
- Socio-economic background or education level

**Examples include but are not limited to:**

- Offensive jokes, remarks, or comments
- Unwanted physical contact or invasion of personal space
- Display of offensive materials or images
- Exclusion from activities or social groups
- Threats, intimidation, or aggressive behaviour
- Spreading malicious rumours or gossip

**4.2 Bullying**

Bullying is repeated, unreasonable behaviour directed towards an individual or group that creates a risk to health and safety. It represents an abuse of power through unreasonable and inappropriate behaviour.

**Characteristics of bullying behaviour:**

- Repeated or persistent conduct over time
- Unreasonable and inappropriate behaviour
- Creates a risk to physical or psychological wellbeing
- Involves an abuse of power or position
- Targets an individual or group systematically

**Types of bullying behaviour:**

- Verbal abuse, including shouting, swearing, or name-calling
- Exclusion from workplace activities or communications

- Unreasonable work demands or impossible deadlines
- Constant criticism or undermining of work
- Withholding information necessary for effective performance
- Public humiliation or embarrassment
- Threats to job security or career progression

### **4.3 Cyberbullying**

Cyberbullying is bullying that occurs through digital platforms, including computers, mobile phones, and other electronic devices. It can happen through social media, text messages, email, online forums, or gaming platforms.

#### **Characteristics of cyberbullying:**

- Use of technology to repeatedly harm or harass others
- Can occur 24/7 and reach a wide audience quickly
- May involve anonymous perpetrators
- Content can be permanent and difficult to remove
- Can follow victims into their personal time and space

#### **Examples include:**

- Sending threatening or abusive messages
- Sharing embarrassing photos or videos without consent
- Creating fake profiles to impersonate or humiliate others
- Excluding individuals from online groups or activities
- Spreading false information or rumours online
- Hacking into personal accounts or devices

### **4.4 Discrimination**

Discrimination occurs when someone is treated unfavourably because of a protected characteristic or because they are perceived to have, or are associated with someone who has, a protected characteristic.

#### **Protected characteristics include:**

- Age, disability, gender reassignment
- Marriage and civil partnership, pregnancy and maternity
- Race, religion or belief, sex, sexual orientation

## **4.5 Victimisation**

Victimisation occurs when someone is treated badly because they have complained about harassment, bullying, or discrimination, or because they have supported someone else's complaint.

## **5. TYPES OF UNACCEPTABLE BEHAVIOUR**

### **5.1 Physical Harassment and Bullying**

Physical harassment and bullying involves unwanted physical contact or the threat of physical harm. This is particularly serious given the military context in which many of our community members operate.

#### **Examples include:**

- Unwanted touching, hugging, or kissing
- Physical intimidation or threatening gestures
- Blocking someone's path or cornering them
- Throwing objects at or near someone
- Deliberately damaging personal property
- Physical assault or violence
- Unwanted physical training or "beasting"
- Initiation ceremonies involving physical contact

**All physical harassment and bullying is taken extremely seriously and may result in immediate suspension pending investigation and potential criminal referral.**

### **5.2 Verbal Harassment and Bullying**

Verbal harassment and bullying encompasses spoken words, tone of voice, and vocal behaviour that creates a hostile environment.

#### **Examples include:**

- Shouting, swearing, or using aggressive language
- Name-calling, insults, or derogatory comments
- Threats of violence or harm
- Offensive jokes or inappropriate stories
- Mimicking accents, speech patterns, or disabilities
- Persistent questioning or interrogation
- Public criticism or humiliation
- Comments about appearance, background, or personal life

### **5.3 Non-Verbal Harassment and Bullying**

Non-verbal harassment and bullying include body language, gestures, and other forms of communication without words.

#### **Examples include:**

- Threatening gestures or expressions
- Inappropriate staring or leering
- Displaying offensive images or materials
- Excluding someone from conversations or activities
- Eye-rolling, sighing, or other dismissive behaviours
- Invasion of personal workspace
- Following or stalking behaviour
- Deliberate ignoring or silent treatment

### **5.4 Online and Digital Harassment**

Given the digital nature of much of Forces Online's work, online harassment is a particular concern that must be addressed comprehensively.

#### **Examples include:**

- Sending abusive emails or messages
- Posting inappropriate content on social media
- Sharing private information without consent
- Creating fake profiles or accounts
- Online stalking or monitoring
- Hacking into accounts or systems
- Posting negative reviews or comments maliciously
- Using technology to track or monitor someone

#### **Digital harassment can be particularly harmful as it can:**

- Occur at any time of day or night
- Reach large audiences quickly
- Create permanent records that are difficult to remove
- Follow victims into their personal lives
- Be anonymous, making it difficult to identify perpetrators



## **5.5 Sexual Harassment**

Sexual harassment is particularly serious and includes any unwanted conduct of a sexual nature that violates a person's dignity.

### **Examples include:**

- Unwanted sexual advances or propositions
- Sexual jokes, comments, or innuendo
- Display of sexual images or materials
- Unwanted physical contact of a sexual nature
- Requests for sexual favours
- Comments about sexual orientation or gender identity
- Intrusive questions about private life or relationships
- Sharing of sexual images without consent

**All reports of sexual harassment will be treated with the utmost seriousness and may result in immediate action including suspension and referral to external authorities.**

## **6. RESPONSIBILITIES**

### **6.1 Organisation Responsibilities**

Forces Online has overall responsibility for creating and maintaining an environment free from harassment and bullying.

#### **Specific responsibilities include:**

##### **Policy Development and Implementation:**

- Developing comprehensive policies and procedures
- Ensuring policies are regularly reviewed and updated
- Communicating policies clearly to all stakeholders
- Providing adequate resources for implementation

##### **Training and Education:**

- Providing regular training on harassment and bullying prevention
- Ensuring all staff understand their responsibilities
- Offering specialised training for managers and investigators
- Creating awareness campaigns and educational materials

**Systems and Procedures:**

- Establishing clear reporting mechanisms
- Ensuring fair and thorough investigation processes
- Maintaining confidential and secure record-keeping systems
- Providing access to support services and resources

**Culture and Environment:**

- Promoting a culture of respect and inclusion
- Leading by example in all interactions
- Recognising and celebrating positive behaviours
- Taking swift action to address problematic behaviours

**Monitoring and Evaluation:**

- Regularly monitoring the effectiveness of policies
- Collecting and analysing data on incidents and trends
- Seeking feedback from stakeholders
- Making improvements based on lessons learned

**6.2 Management Responsibilities**

Managers at all levels have specific responsibilities for preventing and addressing harassment and bullying within their areas of responsibility.

**Key responsibilities include:****Prevention and Awareness:**

- Modelling appropriate behaviour at all times
- Creating inclusive and respectful team environments
- Identifying and addressing potential risks or issues early
- Ensuring team members understand policies and procedures

**Response to Issues:**

- Taking all reports seriously and responding promptly
- Following proper procedures for investigating complaints
- Ensuring appropriate support is provided to all parties
- Taking decisive action when harassment or bullying is identified

**Communication and Support:**

- Maintaining open communication with team members
- Providing regular feedback and recognition
- Addressing conflicts before they escalate
- Supporting the professional development of all team members

**Record Keeping and Reporting:**

- Maintaining accurate records of incidents and actions taken
- Reporting serious incidents to senior management
- Ensuring confidentiality is maintained appropriately
- Following up on actions to ensure effectiveness

**6.3 Individual Responsibilities**

Every individual within the Forces Online community has personal responsibility for contributing to a harassment and bullying-free environment.

**Personal conduct responsibilities:**

- Treating all individuals with respect and dignity
- Being aware of the impact of behaviour on others
- Speaking up against inappropriate behaviour when safe to do so
- Participating in training and development opportunities

**Reporting responsibilities:**

- Reporting incidents of harassment and bullying witnessed or experienced
- Providing truthful information during investigations
- Supporting colleagues who may be experiencing difficulties
- Using appropriate channels for raising concerns

**Supporting others:**

- Offering support to colleagues who report harassment or bullying
- Respecting the confidentiality of sensitive situations
- Avoiding gossip or speculation about incidents
- Contributing to a positive and inclusive culture

**Personal development:**

- Continuously learning about respectful behaviour
- Seeking help when unsure about appropriate conduct

- Reflecting on personal behaviour and its impact on others
- Taking responsibility for personal actions and their consequences

## **6.4 Bystander Responsibilities**

Individuals who witness harassment or bullying have important responsibilities to help create a safe environment for everyone.

### **Bystander intervention includes:**

- Speaking up when it's safe to do so
- Reporting incidents to appropriate authorities
- Supporting those who have been targeted
- Refusing to participate in or encourage negative behaviours

### **Safe intervention strategies:**

- Direct intervention when safe and appropriate
- Distraction techniques to defuse situations
- Delegation to someone in authority
- Delayed response by checking on the victim later
- Document incidents if they occur

## **7. PREVENTION MEASURES**

### **7.1 Training and Awareness**

**Mandatory Training Programme:** Forces Online will implement a comprehensive training programme that includes:

- **Induction training** for all new staff, volunteers, and board members
- **Annual refresher training** for all existing personnel
- **Specialised training** for managers and supervisors
- **Investigation training** for designated personnel
- **Bystander intervention training** for the broader community

### **Training Content:**

- Understanding harassment and bullying definitions and examples
- Recognising the signs and impacts of harassment and bullying
- Learning appropriate intervention techniques
- Understanding reporting procedures and support services

- Developing skills in respectful communication and conflict resolution

#### **Training Methods:**

- Interactive workshops and seminars
- Online learning modules and resources
- Case study discussions and role-playing exercises
- Guest speakers from relevant organisations
- Peer-to-peer learning and mentoring programmes

#### **Training Evaluation:**

- Regular assessment of training effectiveness
- Feedback collection from participants
- Updates based on emerging issues and best practices
- Tracking of training completion and compliance

### **7.2 Communication and Promotion**

#### **Regular Communication:**

- Include harassment and bullying prevention in all staff communications
- Promote the policy through newsletters, websites, and social media
- Share positive examples of respectful behaviour and inclusion
- Provide regular updates on policy changes and improvements

#### **Awareness Campaigns:**

- Organise annual awareness events and activities
- Partner with external organisations for educational programmes
- Create visual reminders and promotional materials
- Engage with the wider Armed Forces community on these issues

#### **Feedback and Engagement:**

- Regular surveys to assess workplace culture and climate
- Focus groups and listening sessions with different stakeholder groups
- Anonymous suggestion boxes and feedback mechanisms
- Open forums for discussion and questions about the policy

### **7.3 Environmental Measures**

**Physical Environment:**

- Ensure all premises are welcoming and inclusive
- Display policy information and contact details prominently
- Create safe spaces for confidential discussions
- Remove or address any potentially offensive materials or displays

**Digital Environment:**

- Implement robust moderation of online platforms and forums
- Provide clear guidelines for online behaviour and communication
- Use technology to monitor and prevent inappropriate content
- Ensure privacy and security of digital communications

**Cultural Environment:**

- Celebrate diversity and inclusion through events and recognition
- Promote positive role models and leadership examples
- Address cultural norms that may enable harassment or bullying
- Encourage open dialogue about respect and inclusion

**8. REPORTING PROCEDURES**

Forces Online provides multiple avenues for reporting harassment and bullying to ensure that everyone feels comfortable and safe in coming forward with concerns.

**8.1 Informal Resolution**

**When appropriate:** Informal resolution may be suitable when:

- The behaviour is less serious or appears to be unintentional
- The complainant wishes to try informal resolution first
- There is a reasonable prospect of resolving the matter informally
- Both parties are willing to participate in informal resolution

**Informal resolution methods:**

- **Direct communication:** Speaking directly with the person whose behaviour is of concern
- **Mediated conversation:** Using a neutral third party to facilitate discussion
- **Managerial intervention:** Having a supervisor or manager address the issue
- **Peer support:** Seeking help from trusted colleagues or mentors

**Documentation:** Even informal resolutions should be documented to ensure:

- A record exists of the concern and action taken
- Patterns of behaviour can be identified if issues recur
- Lessons can be learned to prevent similar situations
- Protection is available if the situation escalates

**Support during informal resolution:**

- Guidance on how to approach difficult conversations
- Access to mediation services and trained facilitators
- Ongoing monitoring to ensure the situation improves
- Option to escalate to formal procedures if needed

## **8.2 Formal Complaints**

**When to use formal procedures:**

- The behaviour is serious or persistent
- Informal resolution has been unsuccessful
- The complainant requests a formal investigation
- There are concerns about safety or welfare
- The behaviour may constitute a criminal offence

**How to make a formal complaint:**

### **Step 1: Initial Complaint**

- Complete the formal complaint form (see Appendix A)
- Submit to the designated Complaints Officer or senior manager
- Provide as much detail as possible about the incident(s)
- Include any evidence, witnesses, or supporting information

### **Step 2: Acknowledgement**

- Complaints will be acknowledged within 2 working days
- Initial assessment will be completed within 5 working days
- Complainant will be informed of the planned next steps
- Support services will be offered immediately

### **Step 3: Investigation**

- Formal investigation will commence within 10 working days

- Trained investigators will be appointed
- All parties will be interviewed and evidence gathered
- Investigation will normally be completed within 30 working days

#### **Step 4: Outcome**

- Investigation report will be prepared and reviewed
- Decision will be communicated to all parties
- Appropriate action will be taken based on findings
- Appeals process will be explained if applicable

#### **Complaint Form Requirements:**

- Date, time, and location of incident(s)
- Names of individuals involved
- Description of behaviour or conduct
- Impact on the complainant
- Any witnesses or evidence
- Preferred outcome or resolution sought

### **8.3 Anonymous Reporting**

#### **Anonymous reporting options:**

- Online reporting form on the Forces Online website
- Anonymous telephone hotline
- Suggestion boxes in key locations
- Third-party reporting services
- Anonymous letters or emails

#### **Benefits of anonymous reporting:**

- Removes fear of retaliation
- Allows reporting of sensitive information
- Enables identification of patterns or trends
- Provides option for those uncomfortable with formal processes

#### **Limitations of anonymous reporting:**

- May limit the ability to conduct thorough investigations
- Cannot provide direct feedback or support to the reporter



- May be more difficult to gather additional information
- May not allow for immediate protective measures

**How anonymous reports are handled:**

- All anonymous reports are taken seriously and investigated where possible
- Information is used to identify trends and systemic issues
- General preventive measures may be implemented based on reports
- Where specific individuals are named, appropriate action will be taken

## **8.4 External Reporting**

**When to consider external reporting:**

- Internal processes have been exhausted without satisfactory resolution
- There are concerns about conflicts of interest in internal processes
- The behaviour may constitute a criminal offence
- There are regulatory or legal requirements to report

**External reporting options:**

**Employment Tribunals:**

- For discrimination, harassment, or whistleblowing claims
- Time limits apply for making claims
- Legal advice may be beneficial
- Conciliation services may be available

**Police:**

- For behaviour that may constitute criminal offences
- Including assault, stalking, harassment, or threats
- Can be reported alongside internal procedures
- May require formal statements and evidence

**Regulatory Bodies:**

- Charity Commission for governance issues
- Professional bodies for conduct issues
- Health and Safety Executive for safety concerns
- Information Commissioner for data protection issues

**Support Organisations:**

- ACAS (Advisory, Conciliation and Arbitration Service)
- Equality and Human Rights Commission
- Citizens Advice Bureau
- Specialist support organisations for Armed Forces personnel

**Forces Online's commitment:**

- We will not discourage external reporting
- We will cooperate fully with external investigations
- We will not retaliate against those who report externally
- We will learn from external findings and recommendations

**9. INVESTIGATION PROCESS****9.1 Initial Assessment****Purpose of initial assessment:**

- Determine the most appropriate response to the complaint
- Assess any immediate risks or safety concerns
- Identify the need for interim protective measures
- Plan the investigation approach and resource requirements

**Assessment criteria:**

- Seriousness and nature of the allegations
- Risk to individuals or the organisation
- Strength of evidence and availability of witnesses
- Previous history or patterns of behaviour
- Preference of the complainant for resolution method

**Assessment outcomes:**

- **Informal resolution:** Referral to mediation or management intervention
- **Formal investigation:** Full investigation process initiated
- **Alternative resolution:** Training, counselling, or other interventions
- **No action:** Where allegations are clearly unfounded or vexatious
- **External referral:** Police or other agencies where appropriate

**Interim measures:** During the assessment period, interim measures may include:

- Temporary changes to working arrangements

- Increased supervision or monitoring
- Suspension with pay where serious allegations exist
- Provision of support services to all parties

## 9.2 Investigation Procedure

### Investigation team:

- **Lead Investigator:** Trained senior staff member with appropriate skills
- **Support Investigator:** Additional investigator for complex cases
- **Note-taker:** Administrative support for interviews and documentation
- **External Investigator:** Independent investigator for serious or complex cases

### Investigation principles:

- **Fairness:** All parties treated with respect and given opportunity to respond
- **Thoroughness:** All relevant evidence and witnesses considered
- **Timeliness:** Investigation completed as quickly as possible without compromising quality
- **Confidentiality:** Information shared only on need-to-know basis
- **Impartiality:** No predetermined outcomes or bias towards any party

### Investigation stages:

#### Stage 1: Planning

- Review complaint and assessment recommendations
- Develop investigation plan and timeline
- Identify witnesses and evidence to be gathered
- Arrange interviews and logistics
- Brief investigation team on roles and responsibilities

#### Stage 2: Evidence Gathering

- Interview complainant to gather detailed account
- Interview respondent to obtain their perspective
- Interview witnesses and gather supporting evidence
- Review relevant documents, emails, and records
- Consider expert evidence where appropriate

#### Stage 3: Analysis

- Analyse all evidence and testimony

- Identify areas of agreement and disagreement
- Consider credibility of witnesses and evidence
- Apply relevant policies and standards
- Reach conclusions on balance of probabilities

#### **Stage 4: Reporting**

- Prepare comprehensive investigation report
- Include findings on each allegation
- Make recommendations for action
- Ensure report is clear, accurate, and well-supported
- Submit to decision-maker for consideration

#### **Interview procedures:**

- All interviews conducted by trained investigators
- Interviewees may be accompanied by support person
- Detailed notes taken and verified with interviewee
- Questions focused on relevant facts and evidence
- Opportunity provided to clarify or add information

### **9.3 Investigation Standards**

#### **Evidence standards:**

- **Balance of probabilities:** Standard of proof applied to investigations
- **Corroboration:** Seek supporting evidence where possible
- **Contemporaneous evidence:** Priority given to immediate records and reports
- **Credibility assessment:** Consider reliability and consistency of accounts
- **Pattern evidence:** Consider any patterns of behaviour or previous incidents

#### **Quality assurance:**

- Regular review of investigation progress
- Peer review of investigation reports
- External quality assurance for complex cases
- Feedback from participants on process quality
- Continuous improvement based on lessons learned

#### **Documentation requirements:**

- Detailed investigation file with all evidence
- Chronological record of all actions taken
- Secure storage with appropriate access controls
- Retention in accordance with data protection requirements
- Regular review and disposal as appropriate

#### **Timeframes:**

- **Simple cases:** Completed within 30 working days
- **Complex cases:** May require up to 60 working days
- **Exceptional cases:** Extended timeframes with regular updates
- **Regular communication:** Weekly updates to all parties on progress
- **Delays:** Explained and new timelines provided

### **9.4 Interim Measures**

#### **Purpose of interim measures:**

- Protect the welfare and safety of all parties
- Prevent further incidents or escalation
- Preserve evidence and maintain investigation integrity
- Maintain organisational operations and morale

#### **Types of interim measures:**

- **Temporary redeployment:** Moving individuals to different roles or locations
- **Supervised contact:** Ensuring interactions are supervised or witnessed
- **Suspension with pay:** Temporary removal from duties pending investigation
- **Restricted access:** Limiting access to certain areas or systems
- **Additional support:** Counselling, mentoring, or other assistance

#### **Decision-making criteria:**

- Seriousness of allegations and potential risks
- Likelihood of further incidents occurring
- Impact on investigation integrity
- Operational requirements and constraints
- Welfare and rights of all parties involved

#### **Review and monitoring:**

- Regular review of interim measures appropriateness
- Adjustment based on investigation progress
- Clear communication about reasons and duration
- Support for all parties affected by measures
- Documentation of all decisions and rationale

## 10. SUPPORT FOR THOSE AFFECTED

### 10.1 Support for Complainants

Forces Online recognises that making a complaint about harassment or bullying can be extremely difficult and potentially traumatic. We are committed to providing comprehensive support throughout the process.

#### Immediate support:

- **Safe space:** Access to confidential and secure meeting locations
- **Emotional support:** Access to counselling and mental health services
- **Practical support:** Time off for interviews, appointments, and recovery
- **Information and guidance:** Clear explanation of processes and rights
- **Advocacy:** Support person to accompany to meetings and interviews

#### Ongoing support:

- **Regular check-ins:** Monitoring of wellbeing and support needs
- **Flexible arrangements:** Adjusted working patterns or responsibilities
- **Career protection:** Ensuring no detriment to career progression
- **Network support:** Connection with peer support groups and networks
- **Professional development:** Continued access to training and opportunities

#### Specialist services:

- **Employee Assistance Programme:** Free confidential counselling
- **Occupational health:** Assessment and support for health impacts
- **Legal advice:** Independent legal guidance where appropriate
- **Financial advice:** Support with any financial implications
- **Specialist charities:** Referral to relevant support organisations

#### Protection measures:

- **No contact arrangements:** Ensuring separation from respondent where necessary
- **Adjusted duties:** Temporary changes to role or responsibilities

- **Security measures:** Enhanced security or monitoring where appropriate
- **Communication support:** Assistance with external communications
- **Return to work:** Phased return and ongoing support

## 10.2 Support for Respondents

Individuals who have complaints made against them also require appropriate support, recognising that they are innocent until proven otherwise and may themselves be experiencing significant stress.

### Initial support:

- **Clear information:** Explanation of allegations and process
- **Legal rights:** Information about rights and entitlements
- **Emotional support:** Access to counselling and support services
- **Representation:** Right to be accompanied at meetings
- **Fair process:** Assurance of fair and impartial investigation

### During investigation:

- **Regular updates:** Communication about process and timescales
- **Interim support:** Assistance with any interim measures imposed
- **Wellbeing monitoring:** Regular check-ins on mental health and welfare
- **Professional advice:** Access to legal and professional guidance
- **Work continuity:** Support to maintain performance where possible

### Post-investigation:

- **Outcome communication:** Clear explanation of findings and rationale
- **Rehabilitation:** Support for return to normal duties if exonerated
- **Appeal support:** Assistance with appeals process if applicable
- **Ongoing monitoring:** Continued support for wellbeing and performance
- **Record management:** Fair treatment of investigation records

## 10.3 Support for Witnesses

Witnesses play a crucial role in investigations and require protection and support to encourage their participation.

### Encouragement to participate:

- **Importance explained:** Understanding of their vital role in the process
- **Protection assured:** Clear commitments about confidentiality and protection

- **Flexibility offered:** Accommodation of personal and professional constraints
- **Support provided:** Access to guidance and emotional support
- **Recognition given:** Appreciation for their courage and civic responsibility

#### **Protection measures:**

- **Confidentiality:** Strict limits on sharing of their identity and testimony
- **No retaliation:** Strong protections against victimisation
- **Anonymity options:** Anonymous testimony where legally possible
- **Security measures:** Additional protections where risks are identified
- **Alternative arrangements:** Different working arrangements if necessary

#### **Ongoing support:**

- **Debriefing:** Opportunity to discuss experience and concerns
- **Monitoring:** Regular check-ins on wellbeing and any concerns
- **Feedback:** Information about outcomes where appropriate
- **Recognition:** Acknowledgement of their contribution to the process
- **Long-term protection:** Ongoing vigilance against any retaliation

## **11. DISCIPLINARY ACTION AND SANCTIONS**

When investigations find that harassment or bullying has occurred, Forces Online will take appropriate and proportionate action to address the behaviour and prevent recurrence.

### **11.1 Range of Sanctions**

The range of potential sanctions reflects the seriousness of the behaviour and the need for both corrective and deterrent effects.

#### **Informal sanctions:**

- **Verbal warning:** For minor or first-time offences
- **Written guidance:** Clear expectations for future behaviour
- **Additional training:** Specific education about appropriate conduct
- **Increased supervision:** Closer monitoring of behaviour and performance
- **Mediated resolution:** Facilitated discussion and agreement

#### **Formal sanctions:**

- **Written warning:** Formal disciplinary record for moderate offences
- **Final written warning:** Serious warning for significant misconduct
- **Demotion:** Reduction in role, responsibilities, or authority



- **Transfer:** Movement to different role or location
- **Suspension without pay:** Temporary removal from duties

#### **Serious sanctions:**

- **Dismissal:** Termination of employment or volunteer relationship
- **Exclusion:** Permanent ban from Forces Online activities and premises
- **Professional referral:** Reporting to professional regulatory bodies
- **Legal action:** Pursuit of civil remedies for damages
- **Criminal referral:** Reporting to police for potential prosecution

#### **Restorative measures:**

- **Apology:** Genuine acknowledgement of harm caused
- **Restitution:** Making good any losses or damages
- **Community service:** Contribution to organisational or community activities
- **Behavioural agreement:** Formal commitments to future conduct
- **Monitoring arrangements:** Ongoing oversight and review

### **11.2 Factors Considered in Sanctions**

#### **Severity factors:**

- **Nature of behaviour:** Type, frequency, and duration of conduct
- **Impact on victim:** Physical, emotional, and professional consequences
- **Abuse of power:** Exploitation of position, rank, or authority
- **Premeditation:** Whether behaviour was planned or spontaneous
- **Pattern of behaviour:** Single incident versus repeated conduct
- **Vulnerability of victim:** Particular targeting of vulnerable individuals

#### **Aggravating factors:**

- **Previous incidents:** History of similar behaviour or warnings
- **Senior position:** Abuse of authority or leadership role
- **Breach of trust:** Violation of special relationship or confidence
- **Public nature:** Behaviour witnessed by others or in public forums
- **Retaliation:** Action taken against those who reported or complained
- **Lack of remorse:** Failure to acknowledge wrongdoing or show regret

- **Ongoing impact:** Continued effects on victim or organisation

#### **Mitigating factors:**

- **First offence:** No previous disciplinary record
- **Genuine remorse:** Sincere acknowledgement and apology
- **Cooperation:** Full participation in investigation process
- **Personal circumstances:** Relevant health, family, or other issues
- **Corrective action:** Steps taken to address behaviour independently
- **Length of service:** Positive contribution over extended period
- **Character references:** Support from colleagues and community

#### **Organisational factors:**

- **Deterrent effect:** Need to prevent similar behaviour by others
- **Public confidence:** Maintaining trust in Forces Online
- **Legal requirements:** Compliance with employment and equality law
- **Precedent:** Consistency with previous similar cases
- **Rehabilitation potential:** Likelihood of successful behaviour change

### **11.3 Appeals Process**

**Right of appeal:** All individuals subject to disciplinary action have the right to appeal both the finding and the sanction imposed.

#### **Grounds for appeal:**

- **Procedural irregularities:** Failure to follow proper procedures
- **New evidence:** Significant evidence not available during investigation
- **Disproportionate sanction:** Penalty excessive for the misconduct found
- **Bias or prejudice:** Evidence of unfair treatment or predetermined outcomes
- **Legal errors:** Misapplication of policy or legal requirements

#### **Appeal procedure:**

- **Timeframe:** Appeals must be submitted within 10 working days of notification
- **Written grounds:** Clear statement of appeal grounds and desired outcome
- **Appeal panel:** Independent panel not involved in original decision
- **Review scope:** Comprehensive review of evidence and decision-making
- **Hearing:** Opportunity to present case and respond to questions
- **Decision:** Final decision communicated within 15 working days

### Appeal outcomes:

- **Dismiss appeal:** Original decision stands
- **Reduce sanction:** Lesser penalty imposed
- **Overturn finding:** No misconduct found
- **Remit for reinvestigation:** Return for fresh investigation
- **Alternative resolution:** Different approach to addressing issues

## 12. CONFIDENTIALITY AND RECORD KEEPING

### Confidentiality principles:

- **Need to know basis:** Information shared only with those requiring it
- **Professional discretion:** Careful consideration of disclosure decisions
- **Consent where possible:** Seeking agreement before sharing information
- **Legal requirements:** Compliance with data protection and other laws
- **Ongoing protection:** Maintaining confidentiality after case closure

### Record keeping standards:

#### Investigation records:

- **Comprehensive documentation:** All evidence, interviews, and decisions
- **Secure storage:** Appropriate physical and digital security measures
- **Access controls:** Limited access to authorised personnel only
- **Retention schedules:** Clear timescales for retention and disposal
- **Regular review:** Periodic assessment of continued need for retention

#### Personal data protection:

- **Data minimisation:** Collecting only necessary information
- **Purpose limitation:** Using data only for stated purposes
- **Accuracy maintenance:** Ensuring records are accurate and up-to-date
- **Security safeguards:** Protecting against unauthorised access or loss
- **Individual rights:** Respecting rights to access, correction, and erasure

#### Information sharing:

#### Internal sharing:

- **Management reporting:** Summary information for oversight purposes
- **Trend analysis:** Anonymous data for policy development

- **Risk assessment:** Information relevant to ongoing risk management
- **Support provision:** Details necessary for providing appropriate support
- **Legal compliance:** Information required for legal or regulatory purposes

**External sharing:**

- **Legal requirements:** Disclosure required by law or court order
- **Safeguarding:** Information sharing to protect vulnerable individuals
- **Professional obligations:** Reporting to regulatory or professional bodies
- **Consent-based:** Sharing with explicit consent of data subjects
- **Public interest:** Disclosure in exceptional public interest circumstances

### **13. PROTECTION AGAINST RETALIATION**

Forces Online has zero tolerance for retaliation against individuals who report harassment and bullying or participate in investigations.

**What constitutes retaliation:**

- **Adverse treatment:** Negative changes to working conditions or treatment
- **Career detriment:** Blocking promotions, training, or development opportunities
- **Social exclusion:** Isolation from colleagues or organisational activities
- **Increased scrutiny:** Excessive monitoring or criticism of work performance
- **Threats or intimidation:** Direct or indirect threats about consequences
- **Spreading rumours:** Damaging gossip or false information about the individual

**Protection measures:**

- **Clear policy:** Explicit prohibition of retaliation in all forms
- **Monitoring systems:** Active monitoring for signs of retaliatory behaviour
- **Reporting mechanisms:** Easy ways to report suspected retaliation
- **Swift response:** Immediate investigation and action against retaliation
- **Support services:** Enhanced support for those experiencing retaliation
- **Sanctions:** Serious consequences for those engaging in retaliation

**Monitoring and prevention:**

- **Regular check-ins:** Proactive contact with those who have reported issues
- **Performance monitoring:** Careful tracking of work-related decisions affecting reporters
- **Cultural awareness:** Training and messaging about retaliation prevention

- **Leadership accountability:** Clear expectations for managers to prevent retaliation
- **Anonymous reporting:** Options for reporting retaliation anonymously

## 14. MONITORING AND REVIEW

**Performance monitoring:** Forces Online is committed to continuously monitoring and improving the effectiveness of this policy.

### Data collection:

- **Incident statistics:** Number, type, and outcomes of complaints
- **Trend analysis:** Patterns in behaviour, locations, and demographics
- **Resolution timeframes:** Speed of complaint resolution and investigation
- **Satisfaction surveys:** Feedback from those using the complaints process
- **Training effectiveness:** Assessment of training impact and uptake

### Regular review process:

- **Annual review:** Comprehensive assessment of policy effectiveness
- **Stakeholder consultation:** Input from staff, volunteers, and service users
- **Expert advice:** External review by harassment and bullying specialists
- **Best practice research:** Comparison with other organisations and sectors
- **Legal updates:** Incorporation of changes in law and regulation

### Continuous improvement:

- **Action planning:** Development of improvement plans based on review findings
- **Resource allocation:** Ensuring adequate resources for policy implementation
- **Communication updates:** Regular updates to stakeholders about improvements
- **Training updates:** Revised training based on lessons learned
- **Policy amendments:** Updates to policy based on experience and feedback

### Reporting and accountability:

- **Annual reports:** Public reporting on harassment and bullying prevention
- **Board oversight:** Regular reports to Forces Online governance structures
- **Stakeholder updates:** Regular communication with key stakeholder groups
- **Transparency measures:** Open communication about challenges and improvements
- **External scrutiny:** Welcome of external review and assessment

## 15. RELATED POLICIES AND LEGISLATION

This policy operates within the context of other Forces Online policies and relevant legislation.

### Related Forces Online policies:

- **Equality and Diversity Policy:** Promoting inclusive and respectful treatment
- **Code of Conduct:** Standards of behaviour for all stakeholders
- **Disciplinary Policy:** Procedures for addressing misconduct
- **Grievance Policy:** Formal processes for raising workplace concerns
- **Whistleblowing Policy:** Protection for reporting serious wrongdoing
- **Social Media Policy:** Guidelines for online behaviour and communication
- **Safeguarding Policy:** Protection of vulnerable adults and children

### Key legislation:

- **Equality Act 2010:** Protection from discrimination and harassment
- **Protection from Harassment Act 1997:** Criminal and civil remedies for harassment
- **Employment Rights Act 1996:** Rights and protections for employees
- **Health and Safety at Work etc. Act 1974:** Duty of care for workplace safety
- **Data Protection Act 2018:** Protection of personal information
- **Human Rights Act 1998:** Fundamental rights and freedoms
- **Corporate Manslaughter and Corporate Homicide Act 2007:** Organisational accountability

### Regulatory guidance:

- **ACAS Code of Practice:** Disciplinary and grievance procedures
- **Equality and Human Rights Commission guidance:** Best practice recommendations
- **Health and Safety Executive guidance:** Workplace stress and mental health
- **Charity Commission guidance:** Governance and safeguarding requirements
- **Information Commissioner's Office guidance:** Data protection compliance

## 16. CONTACT INFORMATION

### Primary contacts for harassment and bullying concerns:

#### Harassment and Bullying Officer

- **Name:** Steve Duce

- **Position:** Head of HR
- **Email:** [steve.duce@forcesonline.org.uk](mailto:steve.duce@forcesonline.org.uk)
- **Phone:** 07754889412
- **Available:** Monday-Friday, 10:00 AM - 4:00 PM

#### **Alternative contacts:**

##### **Chief Executive Officer**

- **Name:** Len Chappell
- **Email:** [len.chappell@forcesonline.org.uk](mailto:len.chappell@forcesonline.org.uk)
- **Phone:** 07826163001

##### **Chair of Trustees**

- **Name:** George Dryburgh
- **Email:** [george.dryburgh@forcesonline.org.uk](mailto:george.dryburgh@forcesonline.org.uk)
- **Phone:** 07918936866

##### **Support Helpline**

- **Phone:** 0300 300 2288
- **Available:** 10:00am 18:00 Monday to Friday
- **Operated by:** Forces Online

##### **Online Live Chat**

- **Websites:** On all our websites
- **Available:** 0930-2200 Monday to Sunday – Holiday Times may vary.
- **Operated by:** Chat Heroes

##### **Online reporting:**

- **Anonymous reporting:** <https://forms.office.com/e/ZH2tktvq9s>
- **Email:** [complaints@forcesonline.org.uk](mailto:complaints@forcesonline.org.uk)
- **Chat to the senior team via the Veterans VirtualHub** <https://www.virtulhub.uk>  
Monday to Friday 10.00am to 4.00pm (Closed on bank holidays).

##### **External support services:**

##### **ACAS (Advisory, Conciliation and Arbitration Service)**

- **Phone:** 0300 123 1100
- **Website:** [www.acas.org.uk](http://www.acas.org.uk)

##### **Equality and Human Rights Commission**

- **Phone:** 0808 800 0082
- **Website:** [www.equalityhumanrights.com](http://www.equalityhumanrights.com)

#### **Samaritans**

- **Phone:** 116 123 (free from any phone)
- **Website:** [www.samaritans.org](http://www.samaritans.org)

#### **Combat Stress**

- **Phone:** 0800 138 1619
- **Website:** [www.combatstress.org.uk](http://www.combatstress.org.uk)

### **17. IMPLEMENTATION AND COMMUNICATION**

#### **Implementation timeline:**

- **Month 1:** Policy approval and resource allocation
- **Month 2:** Staff training and system setup
- **Month 3:** Full policy launch and communication campaign
- **Month 6:** First review and adjustment period
- **Month 12:** Annual comprehensive review

#### **Communication strategy:**

- **All-staff briefings:** Mandatory sessions for all personnel
- **Website publication:** Prominent display on Forces Online website
- **Handbook inclusion:** Integration into staff and volunteer handbooks
- **Induction training:** Inclusion in all new starter programmes
- **Regular reminders:** Ongoing communication through newsletters and updates

#### **Training rollout:**

- **Leadership training:** Priority training for senior managers and trustees
- **Investigator training:** Specialist training for designated investigators
- **General awareness:** Broad-based training for all staff and volunteers
- **Refresher training:** Annual updates and skills reinforcement
- **Specialist training:** Advanced training for specific roles and responsibilities

#### **Success measures:**

- **Awareness levels:** Regular surveys to assess policy knowledge
- **Reporting rates:** Monitoring of complaint and incident reporting



- **Resolution satisfaction:** Feedback on complaints process effectiveness
  - **Culture indicators:** Assessment of organisational culture and climate
  - **Compliance monitoring:** Regular audits of policy implementation
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## **APPENDIX A: COMPLAINT FORM TEMPLATE**

### **CONFIDENTIAL HARASSMENT AND BULLYING COMPLAINT FORM**

#### **Personal Information:**

- **Name:** \_\_\_\_\_
- **Position/Role:** \_\_\_\_\_
- **Department/Team:** \_\_\_\_\_
- **Contact Phone:** \_\_\_\_\_
- **Contact Email:** \_\_\_\_\_
- **Preferred Contact Method:** \_\_\_\_\_

#### **Incident Details:**

- **Date(s) of Incident(s):** \_\_\_\_\_
- **Time(s):** \_\_\_\_\_
- **Location(s):** \_\_\_\_\_
- **Person(s) Involved:** \_\_\_\_\_
- **Witnesses Present:** \_\_\_\_\_

#### **Description of Incident(s):**

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#### **Impact on You:**

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#### **Previous Action Taken:**

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#### **Desired Outcome:**

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#### **Additional Information:**

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**Evidence Attached:** ☐ Yes ☐ No **If yes, please list:** \_\_\_\_\_

**Declaration:** I declare that the information provided is true and accurate to the best of my knowledge.

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

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## **APPENDIX B: INVESTIGATION CHECKLIST**

### **HARASSMENT AND BULLYING INVESTIGATION CHECKLIST**

**Pre-Investigation:** ☐ Complaint received and acknowledged ☐ Initial risk assessment completed ☐ Investigation team appointed ☐ Interim measures considered and implemented ☐ All parties notified of investigation ☐ Investigation plan developed

**Evidence Gathering:** ☐ Complainant interviewed ☐ Respondent interviewed ☐ Witnesses identified and interviewed ☐ Documentary evidence collected ☐ Electronic evidence preserved ☐ Expert evidence obtained (if required)

**Analysis and Decision:** ☐ All evidence reviewed and analysed ☐ Findings reached on each allegation ☐ Recommendations formulated ☐ Investigation report prepared ☐ Legal and policy compliance checked

**Outcome and Follow-up:** ☐ Decision communicated to all parties ☐ Disciplinary action implemented (if required) ☐ Support services arranged ☐ Appeals process explained ☐ Monitoring arrangements established ☐ Lessons learned documented

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## **APPENDIX C: SUPPORT RESOURCES**

### **INTERNAL SUPPORT SERVICES**

#### **Employee Assistance Programme**

- **24/7 confidential counselling**
- **Phone:** 0800 XXX XXXX
- **Online:** [www.eap-provider.com](http://www.eap-provider.com)
- **Services:** Counselling, legal advice, financial guidance

### **EXTERNAL SUPPORT ORGANISATIONS**

#### **Armed Forces Specific:**

- **Combat Stress:** 0800 138 1619
- **SSAFA:** 0800 731 4880
- **Royal British Legion:** 0808 802 8080
- **Help for Heroes:** 01980 844280

#### **General Support:**

- **Samaritans:** 116 123
- **Mind:** 0300 123 3393
- **Victim Support:** 0808 168 9111
- **Women's Aid:** 0808 2000 247

#### Legal Advice:

- **Citizens Advice:** 0808 223 1133
- **ACAS:** 0300 123 1100
- **Equality and Human Rights Commission:** 0808 800 0082
- **Law Society:** 020 7242 1222

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#### Forces Online

**Registered Charity No:** 118955 (England & Wales) SC050678 (Scotland) Applied for (Northern Ireland)

**Website:** [www.forcesonline.org.uk](http://www.forcesonline.org.uk)

**Email:** [len.chappell@forcesonline.org.uk](mailto:len.chappell@forcesonline.org.uk)

**Phone:** 01234 567890

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*This policy demonstrates Forces Online's commitment to creating and maintaining a safe, respectful, and inclusive environment for all members of our community. It will be regularly reviewed and updated to ensure continued effectiveness and compliance with best practice and legal requirements.*

- Legal Requirements: Charity law, GDPR, Equality Act 2010

## Change Record

Date of Change:	Changed By:	Comments:
07/04/2000	LC/ME	Authorised by Trustees.
07/04/2021	LC/ME	Policy Check
07/04/2022	LC/PE/KS	Policy Check
07/04/2023	LC/PE/KS	Policy Check
07/04/2024	LC/PE/KS	Policy Check
07/04/2025	LC/GD/KS	Policy Check
01/09/2025	LC/KS/SD	Format changed to PDF