

Name of Policy

POLICY AND PROCEDURE FOR THE PREVENTION AND ERADICATION OF BULLYING WITHIN THE UNIVERSITY

Version No.1

Contents

1.	PREAMBLE	3
2.	CONTEXT / BACKGROUND.....	3
3.	DEFINITIONS.....	4
4.	LEGAL AND RULES FRAMEWORK.....	5
5.	POLICY STATEMENT	7
6.	PURPOSE.....	8
7.	SCOPE OF APPLICATION	8
8.	PRINCIPLES.....	8
9.	PROCESS.....	9
10.	SUPPORT AND PROTECTION OF COMPLAINANTS	13
11.	ROLES AND RESPONSIBILITIES.....	13
12.	MONITORING AND REVIEW	14
	VERSION HISTORY	14

Policy Title	POLICY AND PROCEDURE FOR THE PREVENTION AND ERADICATION OF BULLYING WITHIN THE UNIVERSITY
Policy Officer	HUMAN RESOURCES
Date Approved	
Date Effective From	On approval by the University Council
Last updated	New

1. PREAMBLE

- 1.1 A key aspect of University life and culture is to enable and foster academically meaningful, collegial, rigorous and robust engagement among members of the University community.
- 1.2 While these engagements may be robust, they must also be conducted in a respectful manner. With this in mind, it is important to ensure that meaningful, collegial, rigorous and robust engagement is not compromised as a result of misuse of this Policy.
- 1.3 It is equally important to ensure that this Policy does not impede the effective operation of the University and the associated requirement that managers hold staff accountable, ensure that the policies of the University are implemented and that its objectives are advanced. This means that managers are expected to exercise their managerial prerogative, which the University supports and promotes.
- 1.4 It is the abuse of this managerial prerogative that is contrary to the objectives of the University, and which may constitute misconduct as per the University's policies.

2. CONTEXT / BACKGROUND

- 2.1 Surveys conducted within the University by academic staff and reports by Organised Labour have indicated that bullying on campus is a serious phenomenon. Bullying has a debilitating impact on mental and emotional wellbeing, and universities are required to tackle bullying, whether by or affecting staff or students.
- 2.2 During its meeting of 12 August 2021, the Senate noted that bullying in its multi-faceted nature could not solely be managed as a form of discrimination or harassment under the Anti-Discrimination Policy and Procedure of the University. Therefore, the Senate confirmed its previous decision that a separate Policy and Procedure document should be developed in that regard.
- 2.3 In developing a separate policy, it is important to distinguish this Policy and Procedure for the Prevention and Eradication of Bullying within the University from existing institutional policies dealing with other forms of harassment, clarify the objectives it should pursue and to specify the required implementation modalities, including the monitoring and review mechanisms.

3. DEFINITIONS

- 3.1 **Bullying** is a single traumatic incident or repeated incidents of unjustified, unwanted conduct, which insults, demeans, humiliates, lowers self-esteem and/or self-confidence and/or creates a hostile and/ or intimidating environment and/or is calculated to induce, by submission or by actual or threatened adverse consequences, an unacceptable learning or work environment for an individual.

At the core of bullying lies abuse of power, which is defined as the unjustified coercive or improper use of power or authority, with adverse consequences for morale and collegial relationships. Abuse of power or authority can take various forms, including but not limited to:

- Harassing behaviour
- Requesting any of the members of the University community to do personal errands or favours
- Pressuring any of the members of the University community to distort facts or break rules
- Interfering with the ability of a colleague or student to work effectively (i.e. by impeding access to information or resources)

Abuse of power can be vertical (top-down or bottom-up) or horizontal and can derive from the alleged perpetrator/s association with individuals occupying powerful positions within the University or within the community external to the University.

- **Top-down bullying** occurs when an alleged perpetrator is in a senior position to the targeted individual;
- **Bottom-up bullying** is when an alleged perpetrator is an individual or a group of subordinates or students who bullies a manager or a University official; or
- **Horizontal bullying** occurs when an individual or group of colleagues/students targets an individual. Bullying can therefore manifest in 'group perpetration'. In this instance, power is derived through 'numbers' as the group is able to overpower the targeted individual psychologically and/or physically as they outnumber the individual concerned. This type of group bullying may be referred to as 'mobbing'.

Bullying manifests in any or a combination of the following forms of abuse, which results in **prejudice and/or physical** and/or **psychological harm** to the complainant:

Cyber-bullying - the inappropriate use of technology, through email, text, cartoons, memes, and web posts on any other form of online communication or electronic technology, which has the same effect as conventional bullying. Cyberbullying or cyber harassment may take place inside or outside the physical University precincts and perpetrated through online platforms and social media.

Harassment refers to an act or omission or more than one act or omission directed towards an individual at the workplace, that is unwelcome, unwanted and has a destructive effect on the complainant or a group of complainants.

Intimidation refers to an unjustified act of compelling or inducing a particular person to do or to abstain from doing any act or to assume or to abandon a particular standpoint justifiable in law or the performance of a duty expected by the University.

Victimisation occurs when one person threatens to subject the other person to potential adverse consequences for exercising any rights enshrined in the Constitution of South Africa or exercising any rights in accordance with the Protected Disclosure Act, Act 26 of 2000.

Vilification - when a person incites hatred towards, contempt for, or severe ridicule of a person or group of persons on any legally recognised grounds.

3.2 **Complaint** – means an allegation by a complainant that:

- a) they have been or are being bullied by a student, employee, line manager, service provider, and/or visitor
- b) a decision purportedly taken against the complainant by any person as defined in the scope of application of this Policy, constitutes abuse of power
- c) as a result of a decision in 3.2(b), the complainant has sustained or may sustain prejudice
- d) a dispute of fact relating to bullying has arisen between a complainant and any person as defined in the scope of application of this Policy, resulting in the complainant sustaining or potentially sustaining prejudice

For purposes of this Policy, a complaint shall include a group complaint but shall not include an allegation that does not relate to a specific complainant or a group of complainants.

3.3 **Complainant** – any person or a group of persons as defined in the scope of application of this Policy who allege to have been subjected to bullying or allege to have witnessed another being subjected to bullying. Such a person or a group or persons must be willing and able to corroborate allegations made against the alleged perpetrator.

4. LEGAL AND RULES FRAMEWORK

Constitution of the Republic of South Africa

4.1 In Chapter 2, Section 7(1), the Constitution of the Republic of South Africa stipulates the Bill of Rights as *a cornerstone of democracy in South Africa, which enshrines the rights of all people in our country and affirms the democratic values of human dignity, equality and freedom.*

4.2 Regarding the right to freedom, Section 12(1)(e), stipulates that *everyone has the right to freedom ..., which includes the right not to be treated or punished in a cruel, inhuman or degrading way.*

- 4.3 While Section 16(1) of the Constitution enshrines the right to freedom of expression for everyone, subsections 2(b) and 2(c) prohibit *incitement of imminent violence and advocacy of hatred that is based on race, ethnicity, gender or religion, and that constitutes incitement to cause harm*, respectively.
- 4.4 Section 33 (1) safeguards for everyone *the right to administrative action that is lawful, reasonable and procedurally fair*.

Accordingly, bullying infringes on the rights to human dignity, equality and freedom (from inhumane or degrading, violence or harm), which rights must be respected, protected, promoted and fulfilled in terms of Section 7(1). The University has implemented rules aimed at ensuring respect for, protection, promotion and fulfilment of these rights by members of its community.

University Rules

- 4.5 The Code of Conduct (HRG/26 – ‘the Code’) are intended to inform the rules and disciplinary codes of the University towards the regulation of ethical, respectful, responsible and diligent conduct of members of the University community.
- 4.6 In this regard, the Code seeks to prevent, *inter alia*, abuse of power and all forms of harassment, but does not provide specific guidelines, which should not relieve an individual of the responsibility of applying the highest ethical standards when reacting to a situation.
- 4.7 As the Code applies to both students and employees, and informs the rules governing their conduct as members of the University community, the following sections provide for mechanisms at the University to enforce the Code.
- 4.8 The University has implemented social justice policies (the Sexual Harassment, Sexual Assault and Rape Policy and Procedures (HRG/10); Policy on Sexual and Romantic Relationships between Staff and Undergraduate and Honours Students (C2016/611); Employment Equity Policy (HRG/06) and Anti-Discrimination Policy (C2020/037) to manage harassment and unfair discrimination within the University.

Students

- 4.9 The University has implemented social justice policies (the Sexual Harassment, Sexual Assault and Rape Policy and Procedures (HRG/10); Policy on Sexual and Romantic Relationships between Staff and Undergraduate and Honours Students (C2016/611) to protect students against any conduct, which could limit their freedom as enshrined in the Bill of Rights;
- 4.10 These policies contemplate disciplinary actions against perpetrators. Section 36 of the Higher Education Act, 101 of 1997 provides for *disciplinary measures and disciplinary procedures for students as may be determined by the institutional statute*, following consultation with Senate and the Student Representative Council.
- 4.11 Section 76(1) of the Wits Statutes stipulate that *disciplinary measures and discipline provisions applicable to the students are set out in the University Rules*. The University Rules for student discipline define misconduct as behaviour within or without the precincts of the University, or whilst on official business of or representing the University, without just excuse, which, *inter alia*:

- 4.11.1 constitutes conduct that tends to bring the University or any part of it or a member of its staff or a student or any part of its student body into *contempt or disrepute*; or
 - 4.11.2 *interferes* with the governance and proper administration of the University; or
 - 4.11.3 *interferes* with the conditions necessary for teaching, learning or research.
- 4.12 Section 5(5) of the Rules stipulates that *such behaviour is subject to disciplinary processes of the University*, and could result in exclusion of the perpetrator for a defined period.

Employees

- 4.13 The Disciplinary Code and Procedure for Employees is premised on discipline for misconduct being a line manager's responsibility. The Policy classifies bullying as misconduct that may be addressed progressively through final written warning (for first time occurrence) and dismissal (for second time occurrence). The Policy also envisages an investigation into alleged misconduct to ascertain the veracity thereof.
- 4.14 Section 1.4.1 of the Disciplinary Code and Procedure for Employees makes the resultant sanctions dependent *on the circumstances of the employee, the nature of the job, and the seriousness, nature and circumstances of a specific transgression, even a first transgression may result in dismissal, suspension or demotion. Similarly, mitigating factors could give rise to a lesser disciplinary sanction*. This presupposes an investigation into the alleged misconduct.

5. POLICY STATEMENT

- 5.1 The University is committed to the principles of collegial, robust engagements and the exercise of managerial prerogative, which must be applied without prejudice to any of its community members.
- 5.2 The University commits to the democratic values of human dignity, equality and freedom as enshrined in the Constitution of South Africa, as well as the right to academic freedom espoused in the Higher Education Act (101 of 1997, as amended).
- 5.3 Accordingly, the University prohibits any conduct, including administrative actions that infringes upon these democratic values or abuses the right to academic freedom and will subject perpetrators of such actions to disciplinary processes.
- 5.4 Recognising the harm of bullying to the educational and work environment, as well as the need to protect the rights of both employees and students to a bullying-free environment, the University commits to devising and implementing appropriate policies, procedures and programmes to address bullying on campus, including cyberbullying. Such procedures and programmes shall aim to enhance the overall wellness of members who experience bullying, including

advocacy programmes and/or support programmes to sensitise members of the University to the legally recognised avenues for the reporting of bullying.

6. PURPOSE

This Policy aims to further the following purposes:

- 6.1 To promote ethical, respectful, responsible and diligent conduct of members of the University community in pursuit of democratic values of human dignity, equality and freedom enshrined in the Constitution of South Africa and the institutional values of professionalism, ethical behaviour, respect, diversity and compassion.
- 6.2 To ensure that complaints are properly and confidentially received, recorded, dealt with and analysed centrally to ensure that the University deals properly and consistently with bullying and has full records. Similarly, the University will manage service level agreements with service providers to achieve this purpose.
- 6.3 To maintain a healthy balance between the lawful use of power, freedoms expressed in the Higher Education Act (as amended), and the rights and responsibilities of students and staff as defined in the University's Code of Conduct and prevailing legislation.

7. SCOPE OF APPLICATION

- 7.1 The policy shall apply to all forms of bullying as defined in paragraph 3.1.
- 7.2 Notwithstanding the existence of social justice policies, which respectively provide for mechanisms to manage harassment and unfair discrimination within the University as forms of bullying, this Policy focuses only on the prevention and eradication of bullying within the University.
- 7.3 Given that it derives its mandate from the Constitution of the Republic of South Africa, the University's Code of Conduct, the Rules of Discipline for both students and employees, and the South African legislative framework, this Policy must be read in conjunction therewith.
- 7.4 The provisions of this Policy shall apply to the entire University community, including students, employees, joint staff, service providers and visitors.

8. PRINCIPLES

The application of this Policy shall be guided by the following principles:

- 8.1 **Advocacy and training** – bullying, as a social phenomenon, is multifaceted in that parties may either lack accountability or find it difficult to prove bullying, as it often comprises micro-aggressions that are hard for outsiders to discern. Therefore, in order to ensure accountability, confidence in reporting bullying and the appropriate management thereof, sensitisation programmes (including diversity sensitisation, gender safety and anti-bullying) for members of the University community shall be implemented.

- 8.2 **Care and Support** – the University shall support the mental health and wellness of employees and students during and after the investigative process, through relevant programmes as the University shall develop and implement from time to time.
- 8.3 **Due process** – The University shall handle all complaints by hearing both sides (*audire alteram partem* rule), while ensuring that the complainant is supported, their complaint is dealt with appropriately and that they are not silenced or further victimised by the alleged perpetrator or the process.
- 8.4 **Impartiality** - committees constituted to adjudicate bullying complaints must observe principles of impartiality and members with interests in any matter must recuse themselves to avoid conflict of interests in the best interests of the fairness of outcomes.
- 8.5 **Immediacy of action** - experiences of bullying must be reported as soon as practicable and investigated by a fact finder and, where applicable, adjudicated as soon as practicable by a competent mediator or duly constituted disciplinary panel, as appropriate, to avoid delays in the administration of justice.
- 8.6 **Privacy and Confidentiality** - complaints resolution and disciplinary processes must ensure that privacy and the rights of the affected person(s) and / or complainant(s) are upheld.
- 8.7 **Protected disclosure** is a legal obligation by the University to protect any of its community members who disclose any information regarding the bullying conduct of other member/s (students or employees) as outlined in the definition of bullying in this Policy. Employees have the right to disclose information about any bullying conduct at the University in a legally protected manner, without fear of reprisals by their line managers or University officials.

9. PROCESS

- 9.1 Recognising that complainants may feel uncomfortable and take time to formally lodge complaints, the University encourages complainants to report experiences or incidents of bullying within a reasonable time. The Director: T&EEO shall facilitate the necessary counselling to overcome such discomfort.
- 9.2 The University further recognises that some members may witness or suspect conduct of bullying or abuse of power against others and would need a mechanism to have these resolved. Therefore, the University encourage such members to report such complaints in writing to the Director: T&EEO following the protected disclosure route.
- 9.3 Preference is to pursue the type of action requested by the complainant but that the University reserves the right in serious cases, and particularly where there is corroborating evidence, to pursue a formal process in the interests of the University as a whole.
- 9.4 Bullying may be managed through informal or formal processes depending on its nature; type; severity; frequency and the relative powers of the people involved.

Informal process

- 9.5 An informal process entails a voluntary and mutually agreed (between the complainant and the alleged perpetrator) process to address complaints of bullying with or without the assistance of trained University mediators.
- 9.6 An informal complaint is lodged voluntarily and directly with the alleged perpetrator, either verbally or in writing, in an attempt to resolve the matter amicably or to stop their bullying actions without going through the disciplinary route.
- 9.7 In the event that the alleged perpetrator is unwilling to cooperate with the complainant in resolving the complaint, the complainant may lodge complaints either verbally or in writing to the Director: Transformation and Employment Equity Office (T&EEO).
- 9.8 The Director: T&EEO or nominee will arrange a meeting in order to assist or advise, ascertain required resolution of the matter from the complainant and establish willingness of the complainant to have the matter mediated.
- 9.9 Prior to appointing a competent mediator, the Director: T&EEO or nominee must ascertain the willingness of the alleged perpetrator to participate in a mediation process aimed at resolving the complaint.
- 9.10 In the event that the Director: T&EEO or nominee is satisfied that the parties to the complaint agree, freely and voluntarily to mediation, s/he will send a written authority to either the internal or external mediator to conduct the mediation process. Both parties must agree on the mediator to be appointed. A fellow employee or student may accompany the complainant to these meetings.
- 9.11 In the event that there is unwillingness on either party or both parties to the complaint to pursue mediation, and the complainant indicates a desire to proceed with formal disciplinary process, the Director: T&EEO will initiate a process as per paragraph 9.17 of the Policy.
- 9.12 Should the parties to the mediation process agree to a settlement, the mediator should reduce that to writing and request that both parties sign in full and final settlement of the matter. The outcomes of the mediation process may include an apology from the alleged perpetrator to the complainant.
- 9.13 In the event that the mediation process fails and the complainant indicates a desire to proceed with formal disciplinary process, the mediator shall report same to the Director: T&EEO who will initiate a process as per paragraph 9.17 of the Policy.

Formal process

A – Receiving a complaint

- 9.14 In the event that a complainant elects to lodge a formal complaint, they must do so in writing, attaching supporting documentation and filing same with the T&EEO. The complainant may be assisted in this by the Director T&EEO or nominee.
- 9.15 While disclosure may be protected, it is recognised that there is a limit to which the University can proceed with anonymous complaints given the rules around *audi alteram partem* (the alleged perpetrator's right to be heard and test the

veracity of a complaint against him/her), at which point consent of the complainant for disclosure of information would need to be sought.

9.16 Upon receipt of a written complaint, the Director: T&EEO or nominee will conduct preliminary investigation of the complaint, which will include requesting a statement from the alleged perpetrator-

9.17 Within 14 days of receiving a written complaint and a statement from the alleged perpetrator and any other evidence obtained in the preliminary investigation, the Director: T&EEO shall convene a Standing Committee¹ dealing with the bullying complaint. The Committee:

- a) shall have the responsibility to determine, in light of the information provided, whether a *prima facie* case of bullying or abuse of power on the part of the perpetrator exists.
- b) If no *prima facie* case exists, shall have the responsibility to determine, in light of the investigation report submitted to it, whether complaints were malicious or vexatious and make recommendations on how these could be addressed.
- c) may recommend any complainant protection measures to be implemented, to the Employee Relations Office (for employees) and Vice-Chancellor (for students) aimed at restoring freedom and peace of the complainant and ensuring that the investigation can proceed without hindrance from the alleged perpetrator.
- d) may recommend steps to be taken in resolving the complaint, based on the findings of the investigation process.
- e) shall draft the terms of reference for the appointment of a fact finder to conduct the investigation of allegations pertaining to bullying.
- f) shall recommend to the Vice-Chancellor the appointment of a fact finder for staff and student complaints from the appropriate internal human rights or social justice experts or externally through the University's procurement processes. Upon the VC endorsing the recommendations, the Director: T&EEO shall submit documents to the appointed fact finder to proceed with the investigation;
- g) shall recommend an expert witness to provide evidence about bullying during the disciplinary hearing and to contextualise the complaint.

B - Investigation

9.18 Investigations shall commence as soon as the fact finder has formally been appointed and provided with the terms of reference.

9.19 The fact finder shall have the following powers:

- (a) To question a person about the substance of the complaint and about any records or document as submitted to the Standing Committee;

¹ The University shall appoint a Social Justice Committee comprising of at least two chairpersons of Transformation Committees (PAS and Academic), a member of the Sexual Harassment Committee. The Social Justice Committee shall be chaired by the Executive responsible for Transformation or a nominee.

- (b) To inspect and copy any record or document provided as part of the complaint process or remove these to make copies or extracts for purposes of concluding the matter and writing a report;
 - (c) Perform any other prescribed function necessary to ensure completeness of information aimed at concluding the investigation report, e.g. interviews with witnesses;
 - (d) Establish the extent to which the line manager (in the case of employees) would objectively be in a position to prosecute the matter.
- 9.20 The timelines for completion of the investigation process depend on the type or nature of the complaint and circumstances surrounding it, but shall not be longer than a month from the date it was commissioned. The fact finder shall provide progress updates to the Director: T&EEO (who shall notify the Standing Committee) as the investigation process unfolds.
- 9.21 The investigation process may take the form of desktop review of submitted documents, interviewing the parties to the complaint and any witnesses who are able to provide pertinent information on the complaint.
- 9.22 Upon concluding the investigation, the fact finder must compile a report establishing the existence of bullying or abuse of power in terms of this Policy, if any. In the event of the complaint being substantiated, the report may include recommendations on measures to be implemented to remedy the complaint, and must be submitted to the Director: T&EEO for processing through the Standing Committee.

C - Disciplinary hearing

- 9.23 Formal complaints shall, where applicable, be processed through the Disciplinary Code and Procedure (G-S-2021-005 - for employees), Rules for Student Discipline (C2017/627A), Service Level Agreements (for service provider employees) and Integrity Hotline (for visitors).
- 9.24 In the event that the disciplinary process finds the perpetrator not guilty of an offence, the matter is closed.
- 9.25 In the event that the alleged perpetrator is found guilty of the offence and a final written warning is deemed an appropriate sanction, the perpetrator shall undergo any social justice training or intervention or community service that the disciplinary process may recommend.

Complaints involving visitors and employees of service providers

- 9.26 The University, through its Marketing Office, will design and place notices at entrances that the University is a ‘bullying free Zone’.
- 9.27 Complaints involving visitors and independent contractors must be submitted to the Registrar, who in consultation with the Legal Office and/or Transformation and Employment Equity Office will find resolution thereto.
- 9.28 In the event where complaints are against employees of the service provider, the Legal Office will request the service provider to take actions that will enable the realization and promotion of the spirit, purport and object of this Policy.
- 9.29 In the event of non-resolution of the dispute, parties may seek recourse to the Human Rights Commission or the Courts.

Appeal or Review

- 9.30 Appeals or review applications by students shall be managed through paragraph 7 of the Rules for Student Discipline (C2017/627A).
- 9.31 Appeals by employees shall be managed through chapter 4 of the Disciplinary Code and Procedure (G-S-2021-005).

External recourse

- 9.32 Parties to the complaint may have recourse to external remedies, including the Commission for Conciliation, Mediation and Arbitration (for staff) or the Human Rights Commission (for both staff and students)
- 9.33 In the event of the outcomes of any disciplinary processes resulting in the alleged perpetrator invoking external legal recourse, the Office that facilitated the disciplinary process shall represent the University in such proceedings.

10. SUPPORT AND PROTECTION OF COMPLAINANTS

- 10.1 The Director: T&EEO shall designate a resource to assist the complainant in writing down their complaint, as the person who alleges should proof the case. In addition, the Director: T&EEO shall facilitate counselling for complainants with a service provider that the University appointed for the health and wellness of its community members.
- 10.2 Complainant protection measures contemplated in paragraph 9.17 (c) of the Policy may, depending on the type, nature and severity of the allegations, include the following:
 - a) redeployment or changes to the reporting lines for the complainant;
 - b) issuing 'cease and desist' letters to the alleged perpetrators;
 - c) suspension of an alleged perpetrator's service
- 10.3 The suspension of an alleged perpetrator's service shall be limited to specific circumstances including:
 - a) where the alleged perpetrator is suspected of having committed an act of such a nature that they should not be allowed to continue service or studies while the matter is being investigated and/or any disciplinary enquiry is conducted;
 - b) where the possibility exists of the alleged perpetrator interfering with the investigation, destroying evidence or intimidating witnesses, aggravating a sensitive situation or causing disruption at the workplace; and/or
 - c) where the nature of the transgression falls within the definition of protected disclosure, including, but not limited to, fraud, theft, assault, victimisation, and unauthorised possession of the University's property.

11. ROLES AND RESPONSIBILITIES

- 11.1 Employees or students shall report all incidents of bullying and victimisation experienced and allegedly perpetuated by staff or students, employees of service providers and/or visitors.
- 11.2 Line managers must ensure that incidents within their knowledge are reported and they must facilitate disciplinary steps, where necessary against perpetrators.

- 11.3 The Legal Office will manage any disciplinary processes involving students in line with the Rules for Student Discipline, and assist with those complaints against the visitors and employees of service providers.
- 11.4 Employee Relations will manage any disciplinary processes involving employees in line with the prevailing staff disciplinary procedure.
- 11.5 The Legal Office and/or the Employee Relations Office shall assist in matters that are referred to external recourse by students (Legal Office) and staff (Employee Relations).
- 11.6 The Registrar, in consultation with the Legal Office and/or Transformation and Employment Equity Office, will facilitate resolution of complaints involving visitors and independent contracts.
- 11.7 The Director: T&EEO shall facilitate informal and formal complaints as per provisions of this Policy.

12. MONITORING AND REVIEW

The Policy shall be reviewed by Senate and the University Forum once every three years or when applicable legislation changes, whichever is earlier. In order to enable the review process, the Director: T&EEO shall maintain a record of complaints addressed through this Policy, and present an analysis thereon to SET, HRC, Senate, the University Forum and Council on an annual basis.

VERSION HISTORY

Version	Date	Summary	Changed by
1	October / November 2021	Policy to regulate incidents of bullying at the University	Senate and University Forum