



Dignity and Respect in Training

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1.0 Purpose

This document aims to promote respect, dignity, safety and equality in training. Every trainee, as are College staff, supervisors, trainers or anyone else involved in the delivery or support of GP training, should be aware that all forms of bullying, discrimination, harassment, and sexual harassment are unacceptable under any circumstances and should not be tolerated.

This document establishes the GP Training Programme's approach to:

- promote a culture of dignity, respect, professionalism and inclusion throughout GP training;
- establish clear expectations for behaviour and make clear that bullying, harassment, discrimination and victimisation will not be tolerated;
- provide clear and accessible mechanisms for reporting and resolving concerns;
- support trainees who experience or witness inappropriate behaviour;
- encourage the early identification and resolution of concerns where appropriate;

2.0 Scope

This document applies to all trainees on the GP Training Programme who may experience or witness inappropriate behaviour connected with their training, including situations arising:

- At training scheme sites or College premises;
- During educational activities, assessments, conferences or training events;
- At College-related social functions;
- Through online or digital communication channels; or
- In any setting connected with GP training or representation of the College.

2.1 Out of Scope

While the College cannot investigate or resolve matters that fall outside its authority, it recognises that experiences of bullying, harassment, sexual harassment or discrimination in the workplace or community can significantly affect a trainee's wellbeing and participation in training.

Where appropriate, the College can provide support, guidance, and signposting to help trainees understand their options and access the appropriate channels for resolution.

Where the issue relates to the employer environment, the matter should be referred to the relevant HR partner.

Where the issue relates to professional conduct, the matter may be referred to the disciplinary action or progression review process or directly referred to the Irish Medical Council.



Matters involving College staff should be referred to the College's Human Resources department.

3.0 Approach Statement

The College is committed to providing a GP training environment that is safe, respectful, inclusive and free from bullying, harassment, sexual harassment, discrimination, victimisation and all other forms of inappropriate behaviour.

Everyone involved in the National Specialist Training Programme in General Practice—including trainees, trainers, supervisors, College staff and others involved in the delivery or support of GP training—is expected to uphold the highest standards of professional behaviour and ethics. All individuals are expected to treat one another with fairness, dignity and respect and must not engage in any conduct that a reasonable person would consider unwelcome, offensive, humiliating, intimidating or inappropriate.

Bullying, harassment, discrimination, sexual harassment, victimisation and other forms of inappropriate behaviour is inconsistent with professional and ethical standards, including those set out in the Irish Medical Council's Guide to Professional Conduct and Ethics for Registered Medical Practitioners, the Trainee Code of Conduct and the College's Employee Handbook.

The College recognises that inappropriate behaviour can have a significant impact on trainee wellbeing, learning, professional development, workplace culture, staff morale and ultimately patient care. The College also recognises that training environments may involve power imbalances, and that trainees and others may feel reluctant to raise concerns for fear of adverse consequences.

The following sections define what the College deems to be inappropriate behaviour. The reader is referred to the appendices for details, including some examples.

3.1 Bullying

Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment which could reasonably be regarded as undermining the individual's right to dignity.

An isolated incident of the behaviour described in this definition may be an affront to dignity at work but as a once off incident may not be considered to be bullying.

3.2 Harassment

Harassment is any unwanted conduct related to a protected characteristic or personal characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment may occur verbally, physically, visually, electronically or through exclusionary conduct and may consist of a single incident or repeated inappropriate behaviour.

The act must be based on one of the nine grounds of discrimination for it to qualify as harassment. The act or conduct can be a one-off event or persistent and repeated behaviour. See section 3.4.

3.3 Sexual Harassment

Sexual harassment is any unwanted verbal, non-verbal or physical conduct of a sexual nature which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

A single incident may constitute sexual harassment.

3.4 Discrimination

Discrimination occurs where a person is treated less favourably because of a protected characteristic or where a policy, practice or requirement disproportionately disadvantages a group protected under equality legislation.

The nine grounds of discrimination include:

- Gender;
- Civil status;
- Sexual orientation;
- Religion;
- Age;
- Disability;
- Race;
- Membership of the Traveller community.

3.5 Victimisation

Victimisation occurs where a person is treated adversely because they have:

- raised a concern or complaint;
- participated in an investigation;

- acted as a witness;
- supported another person in good faith through a complaints process.

Victimisation is prohibited and may itself constitute misconduct.

3.6 What Does Not Constitute Bullying, Harassment or other Forms of Inappropriate Behaviour

The College recognises the distinction between inappropriate behaviour and the reasonable exercise of educational, supervisory or management responsibilities. Critical comments or feedback on progression, that are made in an honest and constructive manner and that are supported by evidence do not constitute an infringement of a person's right to respect and dignity.

The following will not ordinarily constitute bullying or harassment where carried out professionally and reasonably:

- Fair and constructive criticism of one's performance, conduct or attendance;
- Reasonable and essential discipline arising from the good management of one's performance, professionalism, attendance, clinical standards or patient safety;
- Objective progression assessments;
- Reasonable allocation of duties;
- Expectation to meet all training programme requirements;
- Academic judgement;
- Decisions relating to training placements, rotations, educational opportunities or progression through the training programme.
- Reasonable requests to comply with College, Scheme, practice or training requirements;
- A difference of opinion regarding clinical practice, educational matters or workplace issues;
- A once-off disagreement, misunderstanding or interpersonal conflict;
- Legitimate management or training-related decisions that a trainee may disagree with
- Actions taken which can be justified as regards to one's safety, health and welfare

4.0 Support and Advice

Issues relating to bullying, harassment and discrimination can be distressing for all parties involved. College staff can provide support to a trainee but will not speak on their behalf or intervene with their employer.

If a trainee believes that they have been subject to bullying, harassment, sexual harassment or discrimination during the course of their training and within the scope outlined in this policy they may seek support or advice from the following:

- Scheme Directors;

- Assistant Scheme Directors;
- GP Trainee Wellbeing Manager
- HSE wellbeing supports such as:
 - Employer's occupational health services;
 - Employee assistance programmes;
 - Mediation
- Trusted colleagues or mentors;

The reader is referred to Appendix 4 for further guidance on how to respond to instances of inappropriate behaviour.

5.0 Reporting Concerns

Concerns may be raised informally or formally. Individuals are encouraged to raise concerns as early as possible and, where appropriate and safe to do so, to seek informal resolution initially.

Seeking advice or support does not commit the trainee to making a formal complaint.

All complaints under this policy will be treated seriously, fairly, and in the strictest of confidence.

Any reported complaint found to be vexatious or mischievous may be the subject of disciplinary action. This includes but is not limited to instances whereby a complaint is found to be without merit, where false information is submitted, or where the complaint is made with the intention of causing distress or disruption.

The College's Human Resources department should also be contacted in incidents involving College staff.

5.1 Informal Resolution

Where appropriate, concerns may be addressed through:

- Speaking directly to the person concerned;
- Explaining the impact of the behaviour and asking that it stop;
- Seeking support from a trainer, mentor, scheme directing team, manager or HR;
- Using facilitated discussion or informal mediation, where appropriate;
- Health and Wellbeing Manager.

Informal resolution may not be appropriate in all cases, for example where the individual does not feel able to address the matter directly or where the case is of a serious nature, including allegations involving sexual harassment, threats, discrimination, abuse of authority or patient safety concerns.



Choosing to use an informal approach does not prevent an individual from making a formal complaint later if the matter is not resolved.

5.2 Formal Complaints Process

Where informal resolution is inappropriate or unsuccessful, a trainee may submit a complaint formally to the training programme by emailing complaints.training@icgp.ie.

However, before making a formal complaint, trainees are advised to consult their scheme directing team or GP Trainee Wellbeing Manager. Consultation with a contact person is strictly confidential and no further action will be taken without the consent of the complainant. If the behaviour is deemed serious by the contact person and the problem cannot be resolved by informal means, the contact person can assist the complainant in making a formal complaint in writing.

Where the respondent is an employee of the College, the relevant manager must report the complaint to the relevant Human Resources Manager within 5 working days of receipt of the complaint.

6.0 Roles and responsibilities

Trainees	• Behave professionally and respectfully; • Contribute to a psychologically safe learning environment; • Refrain from inappropriate behaviour; • Cooperate with complaints procedures; • Maintain confidentiality where appropriate; • Avoid retaliation or victimisation.
GP Training Unit	• Promote awareness of dignity and respect principles; • Provide accessible reporting pathways; • Ensure fair and timely processes; • Provide education and training where appropriate; • Support individuals involved in complaints processes; • Monitor trends and promote continuous improvement.
HSE	• Under the Safety, Health and Welfare at Work Act 2005, employers have a strict statutory duty to protect employees' safety and mental welfare, which includes maintaining a safe work environment and establishing proper anti-bullying policies.



7.0 Related and Supporting Documentation

- IMC's Guide to Ethics
- Educational Grievance Policy
- Disciplinary Action Policy
- HSE Diversity, Equality and Inclusion information and strategy
- HSE Dignity at Work Policy
- Irish College of GPs Employee Handbook

8.0 Contact

Quality Assurance and Enhancement

gae.training@icgp.ie

Appendix 1—Bullying

Examples of categories that can help clarify the different forms of bullying are detailed below:

Verbal Abuse

- Yelling, shouting, or swearing at others
- Making demeaning, belittling, or sarcastic remarks
- Spreading rumours or gossip intended to harm someone's reputation
- Threatening, intimidating, or blackmailing a colleague
- Persistent, unwarranted criticism or making sarcastic comments about work performance.

Physical Intimidation and Harassment

- Engaging in threatening body language (e.g. blocking someone's path, invading personal space aggressively)
- Physically threatening behaviour, such as making gestures or actions intended to scare
- Unwanted physical contact, such as pushing, shoving, or otherwise physically intimidating another person.

Emotional Manipulation and Exclusion

- Deliberately excluding someone from work-related activities or meetings
- Isolating a colleague or spreading false information to turn others against them
- Sabotaging someone's work or setting them up to fail (e.g. by withholding critical information)
- Manipulating a person's workload or responsibilities to set them up for failure or humiliation.

Cyberbullying

- Sending harassing or threatening emails, messages, or texts
- Publicly shaming or belittling a colleague in group chats or social media
- Sharing private or embarrassing information about a colleague without their permission
- Using online platforms to spread false information or rumours.

Excessive or Unwarranted Surveillance

- Closely monitoring a colleague's every move in a way that is not part of their supervisory role
- Frequently checking up on someone with the intent to exert control or make them feel uncomfortable
- Requiring a colleague to account for their time or work more frequently than necessary.



Unjust Work Assignments and Responsibilities

- Assigning tasks with unreasonable deadlines, expectations, or workloads to create unnecessary stress
- Denying someone training or development opportunities provided to others with similar roles
- Removing important tasks from someone's role without explanation or valid reason
- Assigning undesirable or menial tasks unrelated to a person's job description as a form of punishment.

Sabotage and Professional Undermining

- Taking credit for another's work or ideas and not acknowledging their contribution
- Giving contradictory instructions that cause confusion and errors
- Blocking a colleague's advancement opportunities by giving negative, unmerited feedback to managers
- Failing to share crucial information that directly impacts a colleague's work quality.



Appendix 2—Harassment

Examples of harassment may include one or more of the following and it must be noted that the list is not exhaustive:

- **Verbal:** Inappropriate jokes, comments, ridicule, mocking, using slurs.
- **Non-verbal:** Body gestures, facial/body language, threatening poses, isolation or exclusion.
- **Physical:** Jostling, shoving, touching, pushing, pulling, assault.
- **Sexual:** Unwelcome comments, jokes with sexual overtones, suggestive gestures.
- **Visual:** Displays such as posters, emblems or badges
- **Cyber:** Unwanted, WhatsApp / text messages, email, exclusion from virtual work-related discussion.
- **Discriminatory:** making / mocking offensive or hostile comments about ethnicity, race, nationality, gender identity, or sexual orientation. Denying opportunities based on background or identity.
- **Retaliatory:** Targeting (in any form) or mistreating someone because they reported harassment/discrimination, complained or were part of an investigation.



Appendix 3—Sexual Harassment

Examples include:

- Physical conduct of a sexual nature, including unnecessary touching, brushing against another employee's body, assault and coercive sexual intercourse
- Verbal conduct of a sexual nature, including propositions or pressure for sexual contact, continued suggestions for social contact outside the workplace after it has been made clear that such suggestions are unwelcome, suggestive remarks, innuendo or lewd comments
- Written conduct of a sexual nature, including emails, text messages, or social media posts
- Other conduct of a sexual nature, for example, whistling, leering, and display of sexually suggestive pictures
- Gender-based conduct, including derogatory or degrading insults which are gender based (for example, insulting an employee because they are pregnant or transgender)

Appendix 4—How to Deal with Inappropriate Behaviour

In the Workplace or Training

- Safety is a priority. If a trainee feels unsafe, they should remove themselves from the situation and seek support from a senior colleague or supervisor.
- The trainee should keep a factual record of what happened, including the date, time, location, who was involved, and any witnesses.
- Trainees are encouraged to talk to someone they trust, the HSE Support Person, trainer, scheme mentor or Trainee Wellbeing.
- Concerns should be reported through the most appropriate route, which may include the trainer, scheme mentor, Human Resources, and the HSE Dignity at Work Policy. Consider reporting on the HSE National Incident Management System (NIMS).
- Trainees are encouraged to seek advice before deciding on next steps. Formal complaints do not need to be submitted immediately, and discussing options with a trusted person can help determine what is the best course of action.
- If trainees feel additional support would be helpful, confidential services such as Trainee Wellbeing, the HSE Employee Assistance Programme (EAP), their own GP, the NCHD hub or the Practitioner Health Matters Programme are available.

Outside the Workplace or Training

If a trainee experiences or witnesses inappropriate behaviour in the community:

- Safety is a priority. Where appropriate, the incident should be reported to the organisation or service where it occurred.
- If the trainee believes a criminal offence or hate crime has occurred, they should contact An Garda Síochána.
- Racist incidents can also be reported confidentially through iReport.ie, which helps monitor racism and support national advocacy.
- For additional support, confidential services such as Trainee Wellbeing, the HSE Employee Assistance Programme (EAP), own GP, or the Practitioner Health Matters Programme are available.



Witness to Inappropriate Behaviour

If it is safe and appropriate to do so:

- The trainee should check in with the person afterwards and ask if they are okay.
- The trainee can offer support, including accompanying them to speak with a trainer or manager if they wish.
- The trainee can offer the affected person to act as a witness and keep a factual record of what they observed.
- As a witness, the trainee should respect the affected person's decision about reporting. In most circumstances, a witness should not include in a report of inappropriate behaviour the affected person's name or their personal details without their knowledge and agreement.
- The trainee should consider seeking advice if they are unsure how to respond. Concerns can be discussed with an appropriate senior person or support service but they should not identify the affected person without their knowledge and agreement.