

The Lir, National Academy of Dramatic Art

Trinity College Dublin

Dignity and Respect Policy

Including Complaints Procedure for Staff, Students, Short-Course Participants, and the General Public

Revision 1 / June 2026 / Review Date: June 2027

Policy title	Dignity and Respect Policy
Draft Number	1
Replaces	Harassment and Bullying Policy 2024
Applies to	All staff, students, short-course participants, contractors, freelancers, volunteers, alumni, and members of the public interacting with The Lir Academy
Data controller	Trinity College Dublin Academy of Dramatic Art CLG (Trading as The Lir National Academy of Dramatic Arts) (CRO 485560)
Legal framework	Employment Equality Acts 1998–2015; Equal Status Acts 2000–2018; Safety, Health and Welfare at Work Act 2005; Work Life Balance and Miscellaneous Provisions Act 2023; Data Protection Acts 1988–2018; GDPR (EU) 2016/679; Children First Act 2015; IHREC Code of Practice on Sexual Harassment and Harassment at Work; HSA Code of Practice for Employers and Employees on the Prevention and Resolution of Bullying at Work
Approved by	Board of Directors, The Lir Academy
Date proposed	14 th July 2026
Review date	June 2027
Policy owner/s	Director of Access & Equality / Director of Administration & Company Secretary / Director of Marketing

Policy Implementation Manager

HR Manager

1. Purpose and Scope

The Lir, National Academy of Dramatic Art at Trinity College Dublin ('The Lir Academy') is committed to providing a positive, safe, and respectful environment for all who study, work at, or engage with the Academy. This policy sets out The Lir Academy's commitment to dignity and respect, and establishes the framework for addressing complaints of bullying, harassment, sexual misconduct, and related behaviours.

This policy applies to:

- All staff employed by The Lir Academy in any capacity, including permanent, part-time, temporary, casual, honorary, visiting, and voluntary staff, contractors, agency workers, and freelance tutors
- All students enrolled in postgraduate or undergraduate programmes delivered by The Lir Academy, who are also subject to the Dignity and Respect Policy of Trinity College Dublin
<https://www.tcd.ie/media/tcd/about/policies/pdfs/hr/dignity-and-respect.pdf>
- All participants in short-course programmes delivered by The Lir Academy
- Alumni and members of the public, visitors, and any other person who interacts with The Lir Academy in a professional or institutional capacity

This policy applies to behaviour that occurs on The Lir Academy premises in the course of Academy-related activities (including social functions, performances, tours, and field events), on placement, or online where the behaviour is connected to Academy activities. It applies regardless of whether the behaviour occurs during or outside working or study hours, where there is a sufficient connection to the Academy environment.

This policy is aligned with Trinity College Dublin's Dignity and Respect Policy (Revision 5, November 2023), given that students of The Lir Academy are registered students of Trinity College Dublin. Where a complaint involves Trinity's processes or personnel, the relevant Trinity pathways will be referenced and, where appropriate, engaged.

This policy should be read in conjunction with The Lir Academy's Data Protection Policy, Grievance Procedure, and Disciplinary Procedure.

2. Our Commitment

The Lir Academy does not tolerate bullying, harassment, sexual misconduct, or any form of behaviour that undermines the dignity of any person.

Every person who engages with The Lir Academy has the right to be treated with dignity and respect. This right extends equally to complainants and respondents in any complaint process.

The Lir Academy recognises that the dramatic arts environment with its intensive interpersonal dynamics, power differentials between staff and students, and creative vulnerability creates a context in which issues of dignity and respect require particular awareness and care.

The Lir Academy is committed to:

- Maintaining a culture of dignity, respect, and inclusion for all
- Taking all complaints seriously, promptly, and confidentially
- Ensuring that all parties to a complaint are treated fairly and with respect throughout the process
- Providing appropriate support to complainants, respondents, and witnesses
- Taking appropriate action where a breach of this policy is established
- Ensuring that no person suffers retaliation or victimisation for making a complaint in good faith, supporting a complaint, or participating in an investigation
- Acting when it becomes aware of concerns even in the absence of a formal complaint, for example through anonymous reports, exit interviews, or disclosures made to staff

2A. Key Principles and Policy Overview

Principles	
Institutional Commitment	The Lir Academy is committed to promoting a positive environment where everyone is treated with dignity and respect, and where work and study are free from bullying or any form of harassment.
Collective Responsibility	Everyone who engages with The Lir Academy has a responsibility to behave in a respectful way, to respect the dignity of others, and to participate in creating a positive environment.
Roles and Responsibilities	We each have a responsibility to be clear on our roles and responsibilities as staff, students, managers, contractors, freelancers, suppliers, and members of the public.
Zero Tolerance	Any form of bullying or harassment is unacceptable. Breaches of this policy will not be tolerated.
Disclosure Encouraged	The Lir Academy is committed to developing a culture where disclosure and reporting of any instance of bullying or harassment is encouraged, and where transparency in how matters are dealt with is maintained. The Lir Academy

	has a duty to act if it becomes aware of bullying or harassment without a formal complaint being made.
Policy Implementation	
Who Is Covered	All staff, students, short-course participants, contractors, freelancers, suppliers, alumni, and all those who engage with The Lir Academy in any capacity are covered by and required to adhere to this policy.
Information and Training	The Lir Academy will promote awareness and understanding of bullying and harassment through training and support for all staff and students.
Professional Support	An appropriate and accessible suite of supports is available to anyone who experiences bullying or harassment, and to respondents to complaints.
Policy Breaches	Breaches of this policy will be addressed through the appropriate disciplinary procedures. Serious breaches will be considered as gross misconduct.
Procedure Overview	
Which Route to Take	This policy provides clarity on the appropriate routes to resolution for all stakeholder groups.
Disclosure vs Complaint	Making a disclosure or raising a concern does not constitute making a formal complaint. Support may be sought at any stage without initiating a formal process.
Informal Resolution	Where possible and appropriate, consider if a concern or complaint could be resolved informally. All informal resolution avenues should be explored before formal proceedings are initiated.
Formal Process	If informal resolution is not appropriate or has not succeeded, formal proceedings may be initiated through the Complaint Form.
Thorough Investigation	Formal complaints will be investigated in a thorough, confidential, and impartial manner. Independent external investigators may be engaged where appropriate.
Confidentiality	Confidentiality will be maintained throughout any process or investigation to the greatest extent consistent with the requirements of a fair investigation and applicable legal requirements.
Timelines	Complaints and concerns should be made as early as possible after the incident occurs. Timelines are important for the integrity of any investigation.

Statutory Rights Preserved	This policy does not limit any person's statutory rights, including the right to report matters to An Garda Síochána or to make a complaint to the Workplace Relations Commission. See Section 11 for important information on statutory time limits.
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3. Definitions

3.1 Concern, Disclosure, and Complaint - Key Distinctions

It is important to understand the distinction between a concern, a disclosure, and a formal complaint. These are different stages and carry different implications.

Concern	A matter that engages a person's attention or affects their welfare. For example, a concern about how they have been treated. A person raising a concern may wish to seek advice or have the matter addressed informally, without making a formal complaint.
Disclosure	Where an individual discloses that they feel they have been subjected to bullying, harassment, or related behaviour. Making a disclosure does not constitute making a formal complaint. After seeking support and advice, a person who has made a disclosure may decide whether to proceed to a formal complaint.
Complaint	A formal complaint is made by completing and submitting the Complaint Form to the HR Manager. A complaint names the person whose behaviour is complained of and sets out the details of the alleged behaviour. Only at this stage does the formal process commence.
Complainant	The person who makes a formal complaint using the Complaint Form alleging that they have been subject to bullying, harassment, or related behaviour.
Respondent	The person named in a formal complaint as having allegedly carried out the bullying, harassment, or related behaviour.
Reporting Person	A person who has come forward to report an incident they consider to be bullying or harassment, but who has not yet submitted a formal Complaint Form.
Person Being Reported	The individual the reporting person considers to be conducting the bullying or harassment behaviour, where no formal Complaint Form has yet been submitted.

3.2 What Is a Respectful Positive Culture?

It is a culture where all opinions and backgrounds are valued, one where:

- We treat all people with dignity and respect.
- Everyone is valued with no unfavourable treatment permitted regarding any characteristics related to: where they are from; their disability status; religion; gender; sexual orientation; size; age; race; ethnicity; membership of the Traveller community (incorporating principles of our Equality Policy).
- We can freely express ourselves and share our ideas with confidence that will not be disrespected or mistreated in any way.
- We practice constructive dialogue when engaging with each other.
- Disputes and disagreements are resolved in a healthy, respectful way.
- We have open channels of communication.
- We value diversity of views, perspectives and backgrounds, without presumption or judgement.
- New colleagues and classmates are welcomed across the Academy. Advancement and promotions are unbiased, fair, and based entirely on merit.
- It is not the intention of the policy to discourage or prevent normal good-humoured chat and banter between colleagues and classmates.
- Care must be taken not to cross the line into unacceptable behaviour, which may be offensive, abusive, intimidating, malicious, or insulting.
- Every individual should be aware of their own behaviour and its potential effects on others.
- Breaches of the policy may constitute grounds for invoking disciplinary procedures which may result in sanction up to and including dismissal or expulsion.
- This policy does not affect any person's statutory rights under the Employment Equality Acts, the Equal Status Acts and the Public Sector Equality and Human Rights Duty (the Public Sector Duty) as set out in section 42 of the Irish Human Rights and Equality Commission Act 2014.

3.3 Bullying

Bullying is defined as 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 or study and/or in the course of employment or study, which could reasonably be regarded as undermining the individual's right to dignity and respect.

An isolated incident of the behaviour described in this definition may be an affront to dignity but, as a once-off incident, is not considered to be bullying. Repeated behaviour is a key element of this definition.

Bullying can take many forms, including:

- Verbal: personal insults; demeaning remarks; humiliation in front of others; persistent targeting; threats; or shouting
- Non-verbal or indirect: exclusion; hostile attitudes; spreading malicious rumours; abuse of power; excessive or unjustified criticism; or withholding essential information

- Physical: aggressive behaviour; physical intimidation; unwelcome physical contact
- Online or digital: sustained inappropriate behaviour via email; social media; messaging platforms; or other digital means ('cyberbullying')

3.4 Harassment

Harassment is defined as any form of unwanted conduct related to one or more of the nine protected characteristics under the Employment Equality Acts 1998–2015, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. A single incident can constitute harassment.

The nine protected characteristics are: gender; civil status; family status; age; disability; sexual orientation; race, colour, nationality, or ethnic or national origin; religion; and membership of the Traveller community.

Unwanted conduct may consist of acts; requests; spoken words; gestures; or the production, display, or circulation of written words, pictures, or other materials. Harassment may be verbal; non-verbal; physical; visual; electronic; or through any other form of communication.

It is the unwanted nature of the conduct that distinguishes harassment from behaviour which is welcome and mutual. The fact that a person has previously agreed to or tolerated certain behaviour does not stop them from deciding that it has become unwanted.

3.5 Sexual Harassment

Sexual harassment is any form of unwanted verbal, non-verbal, or physical conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Examples include unwelcome sexual advances; suggestive comments, jokes, or innuendo; requests for sexual favours; threats; leering; sexually suggestive gestures; display or circulation of sexually explicit material; and unwelcome physical contact of a sexual nature. Electronic forms such as messages, images, or content transmitted digitally are included.

The unwanted nature of sexual harassment distinguishes it from mutually welcome interaction. A single incident of sexual harassment can be sufficient to constitute a breach of this policy. It is the impact on the recipient, not the intention of the person, that is relevant.

3.6 Sexual Misconduct

Sexual misconduct encompasses a broad range of inappropriate and unwanted behaviours of a sexual nature, including sexual harassment and sexual violence. It may be committed by a person of any gender and can occur between people of the same or different genders. Sexual assault, including rape, constitutes a criminal offence. Where conduct may constitute a criminal act, the matter should be reported to An Garda Síochána. The Lir Academy will support any individual who wishes to

make such a report and will take appropriate internal steps in parallel, where possible.

3.7 Discrimination

The Employment Equality Acts 1998–2015 define discrimination as treating one person in a less favourable way than another based on any of the nine equality grounds set out above. Discrimination (other than harassment) is managed under The Lir Academy's Grievance Procedure. Claims of harassment on an equality ground are managed under this policy.

3.8 Victimisation, Penalisation, and Retaliation

Victimisation occurs where a person is treated less favourably because they have made a complaint, supported a complaint, given evidence in relation to a complaint, or otherwise exercised their rights under this policy or under equality legislation. Victimisation is itself a breach of this policy and of the Employment Equality Acts 1998–2015.

The Safety, Health and Welfare at Work Act 2005 separately prohibits employers from penalising employees for making complaints about health and safety matters in the workplace. Penalisation includes suspending, demoting, or dismissing an employee, reducing their wages, or coercing or intimidating them.

The Lir Academy will not tolerate retaliation or penalisation of any kind against a person who has made a complaint in good faith, supported a complaint, participated in an investigation, or otherwise engaged with this policy.

4. Responsibilities

4.1 The Lir Academy — Institutional Responsibilities

- Maintain, communicate, implement, and review this policy
- Ensure that all staff, students, and stakeholders are aware of this policy and the complaints process
- Provide appropriate training for staff, including those with responsibilities under this policy
- Act when it becomes aware of a concern or potential breach of this policy even without a formal complaint having been made
- Ensure that complaints are handled promptly, fairly, and confidentially
- Take appropriate action where a breach of this policy is established
- Ensure that no person suffers victimisation, penalisation, or retaliation for engaging with this policy in good faith
- Maintain appropriate records and produce an annual anonymised statistical report to the Board of Directors on contacts, disclosures, and formal complaints under this policy

4.2 All Staff

- Treat all colleagues, students, contractors, and visitors with dignity and respect at all times
- Be familiar with the principles of this policy and contribute positively to a culture of dignity and respect
- Refrain from any behaviour that constitutes bullying, harassment, or sexual misconduct
- Report concerns about the behaviour of others to an appropriate person
- Encourage any individual who confides in them that they have experienced bullying or harassment to seek support from available sources
- Co-operate with any investigation under this policy
- Maintain confidentiality in relation to any complaint or investigation

4.3 All Students

- Treat fellow students, staff, and others connected to The Lir Academy with dignity and respect
- Refrain from any behaviour that constitutes bullying, harassment, or sexual misconduct
- Report concerns to the appropriate person as set out in this policy
- Co-operate with any investigation under this policy
- Maintain confidentiality in relation to any complaint or investigation

4.4 Managers and Academic Leaders

- Model and promote respectful behaviour and a culture of dignity and respect
- Proactively maintain awareness of dignity and respect issues in their area of responsibility
- Address concerns or complaints brought to their attention promptly and appropriately
- Refer complaints to the HR Manager where appropriate
- Not allow personal relationships or other factors to influence the handling of a complaint
- Seek guidance from the HR Manager if uncertain about how to respond to a concern

5. Confidentiality

All parties to a complaint process (complainants, respondents, witnesses, and those involved in handling the complaint) are required to maintain strict confidentiality throughout and after the process. Breaching confidentiality is itself a disciplinary matter.

The Lir Academy will manage all information relating to a complaint on a need-to-know basis and in accordance with its Data Protection Policy, the GDPR, and the Data Protection Acts 1988–2018.

The complainant's wish for confidentiality will be respected as far as possible. However, absolute confidentiality cannot be guaranteed in all circumstances. Confidentiality may not be maintainable where:

- The behaviour complained of may constitute a criminal act
- There is a risk to the health, safety, or welfare of any person
- A respondent may repeat their actions and pose a real physical or mental threat to the wellbeing of others or to their own safety
- An individual involved is a minor or a vulnerable person
- Disclosure is required by law or statute
- It is necessary to share information with the respondent in order to allow them to respond to the complaint

NOTE: The requirement for confidentiality does not prevent any party from confiding in confidential support services, including the Employee Assistance Programme, student counselling services, a trade union or student union representative, a Trinity DR&C Support Advisor, or another support person. Accessing such supports does not breach the confidentiality requirement.

Any person who discloses information about a complaint to parties not involved in the process may be subject to disciplinary action.

6. Support Available

The Lir Academy recognises that raising or responding to a complaint can be a difficult and stressful experience. Support is available to all parties at every stage, including before deciding whether to make a formal complaint.

6.1 Internal Supports

- HR Manager - available to all staff and students for guidance on the process, available options, and signposting of supports (hr@thelir.ie)
- Academic Administrator - first point of contact for postgraduate and undergraduate student concerns
- Short Course Manager - first point of contact for short-course participant concerns
- Director of The Lir Academy - available for concerns involving senior staff or where a conflict of interest exists at management level
- Chair of the Board of Directors - available for concerns involving the Director or senior leadership including Members of the Board
- Chair of the Equality and Diversity Committee - anonymous confidential reporting - inconfidence@thelir.ie

6.2 Trinity Supports (available to TCD-registered students)

- Trinity Dignity, Respect & Consent (DR&C) Service - provides confidential information, support, and signposting for registered Trinity students and staff on all aspects of bullying, harassment, and sexual misconduct: www.tcd.ie/hr/dignity-and-respect
- Trinity DR&C Support Advisors - trained advisors who can provide impartial information and support through any stage of a complaint process, including accompanying a complainant or respondent to investigation meetings
- Trinity Student Counselling Service
- Trinity Student Union

6.3 External Supports

- Employee Assistance Programme (EAP) - available to all staff for confidential counselling and support - lenabyinspire.com
- An Garda Síochána - where conduct may constitute a criminal act (emergency: 999 / 112)
- Irish Human Rights and Equality Commission (IHREC) - www.ihrec.ie | Tel: 01 858 9601
- Workplace Relations Commission (WRC) - www.workplacerelations.ie | Lo-call: 0818 80 80 90
- Data Protection Commission - www.dataprotection.ie

IMPORTANT - STATUTORY TIME LIMITS

Your right to make a complaint to the Workplace Relations Commission (WRC) under the Employment Equality Acts or the Equal Status Acts is subject to a statutory time limit of six months from the last act of discrimination or harassment. This time limit is not paused or extended by the existence of an internal workplace or institutional investigation, it continues to run. If you are considering a WRC complaint, you should seek independent legal advice without delay.

Contact: Workplace Relations Commission | www.workplacerelations.ie | Lo-call: 0818 80 80 90

7. Complaints Procedure

The Lir Academy's complaints procedure is accessible, fair, prompt, and proportionate. It applies to all stakeholders: staff, students, short-course participants, and members of the general public with pathways tailored to each group.

There are two stages: informal and formal. Informal resolution should be considered and, where appropriate, exhausted before the formal stage is initiated. However, in cases involving sexual misconduct, a significant power imbalance, or where informal resolution has previously been attempted without success, the complainant may proceed directly to the formal stage.

At any stage of the formal process, the complainant may seek to revert to informal resolution. The complainant is the decision-maker about which pathway to pursue.

NOTE: Complaints under this policy relate to behaviour not to academic results, assignment of duties, or terms and conditions of employment or study. Complaints of the latter nature should be addressed under The Lir Academy's Grievance Procedure or Academic Appeals process as appropriate.

Summary of Complaints Pathways

Stage	Staff Pathway	Student / Public Pathway
Concern / Disclosure	Seek advice from HR Manager or relevant support. Consider informal options. A disclosure or concern does not constitute a formal complaint.	Seek advice from Academic Administrator, Short Course Manager, or Trinity DR&C Service. A disclosure or concern does not constitute a formal complaint.
Informal Stage	Informal conversation; facilitated discussion involving a manager; mediation. See Appendix A.	Informal conversation (if appropriate); facilitated discussion via Academic Administrator or Short Course Manager; mediation. See Appendix A.
Formal Stage	For a staff complaint towards a student – complete Trinity's Formal Complaint Form Submit (https://www.tcd.ie/hr/dignity-and-respect/students/students-making-a-complaint/) For a staff complaint towards a staff member of The Lir Academy, complete The Lir Academy's Complaint Form (see here) and send to HR Manager at hr@thelir.ie. Once received, a Screening Panel will be convened.	For student complaint towards another student – complete Trinity's Formal Complaint Form Submit (https://www.tcd.ie/hr/dignity-and-respect/students/students-making-a-complaint/) For a student complaint towards a staff member of The Lir Academy, complete The Lir Academy's Complaint Form (see here) and send to HR Manager at hr@thelir.ie. Once received, a Screening Panel will be convened.

Screening Panel	For a Lir Academy-led complaint, the Screening Panel will aim to be comprised of 2 external parties and 1 Lir Board member, with Lir Director of Access and Equality as observer. For Trinity-led complaints, Trinity DR&C will advise of the panel make up. Panel reviews redacted complaint against policy. Recommends informal resolution or formal investigation. Fully external panel reviews complaint against policy. Recommends informal resolution or formal investigation. The decision of the Screening Panel is final and cannot be appealed. Appeals can be submitted based on final outcome of investigation only.	For Trinity-led complaints, Trinity DR&C will advise of the panel make up. For Lir Academy led complaint, the Screening Panel will aim to be comprised of 2 external parties and 1 Lir Board member, with Lir Director of Access and Equality as observer. Panel reviews redacted complaint against policy. Recommends informal resolution or formal investigation. Fully external panel reviews complaint against policy. Recommends informal resolution or formal investigation. The decision of the Screening Panel is final and cannot be appealed. Appeals can be submitted based on final outcome of investigation only.
Out of Scope	Panel advises complainant in writing with reasons and signposts to appropriate alternative procedures. Respondent not normally notified.	Panel advises complainant in writing with reasons and signposts to appropriate alternative procedures. Respondent not normally notified.
Investigation	External independent investigator may be appointed if appropriate. Terms of reference issued. Investigation conducted. Report issued.	External independent investigator may be appointed if appropriate. Terms of reference issued. Investigation conducted. Report issued.
Outcome / Action	HR Manager / Board implement recommendations. Respondent notified. Counter-allegations treated as separate complaint. Appeal pathway available.	HR Manager / Board implement recommendations. Respondent notified. Counter-allegations treated as separate complaint. Appeal pathway available.

7A. Staff Complaints Procedure

Informal Stage - Staff

Where a member of staff experiences behaviour they consider to be bullying, harassment, or sexual misconduct, they are encouraged in the first instance to consider informal resolution options where safe and appropriate. Informal options include:

- Speaking directly to the person whose behaviour is causing concern, making clear that the behaviour is unwanted and asking that it stop. The person may not be aware that their behaviour is causing concern
- Seeking support from their line manager or a senior colleague to facilitate a conversation
- Requesting a facilitated discussion with the involvement of the HR Manager
- Requesting mediation (see Appendix A)

Staff are not obliged to confront the person whose behaviour is causing concern directly and are not required to pursue informal resolution before making a formal complaint, particularly in cases involving sexual misconduct or a significant power imbalance. If informal resolution is not possible or appropriate, the member of staff should contact the HR Manager, who will advise on available options.

Staff members are encouraged to keep a contemporaneous record of any incidents, including dates, times, locations, what was said or done, any witnesses, and the impact on them.

If someone raises a concern with you, about you:

Be open to the approach, understanding how difficult it can be for a person to speak up to raise the issue. If you do not agree with the person or accept that any change is necessary, consider how you, or you both, might best seek support in resolving the issue. Supports are available to you and are outlined in the policy.

If you see something you are concerned about:

We all should be aware of the safety and welfare of colleagues/classmates, even if we are not in a formal position of responsibility. We should always respect the privacy of others, however, if a concern arises for the welfare of a colleague/classmate, the matter should be raised with an appropriate person or the HR Manager. Where a disclosure or reporting of any instance of inappropriate behaviour is made, transparency is ensured via this policy as to how the College deals with such matters. This policy should not justify unwanted interference in the affairs of another.

Formal Stage - Staff (Named Complaint)

Where informal resolution is not appropriate or has not resolved the matter, a member of staff may proceed to the formal stage by completing the Complaint Form and submitting it to the HR Manager at hr@thelir.ie.

On receipt of a completed Complaint Form:

- The HR Manager will acknowledge receipt within five working days and confirm next steps
- A Screening Panel will be convened and where appropriate, composed of persons external to The Lir Academy and free from any conflict of interest
- The Screening Panel will determine whether the complaint falls within the scope of this policy and recommend whether informal intervention or a formal investigation should proceed
- Where the Screening Panel recommends informal options, this will not preclude progression to formal investigation if informal options are unsuccessful
- Where the complaint is found not to fall within the scope of this policy, the complainant will be informed in writing with reasons and signposted to the appropriate alternative procedure. The respondent will not normally be notified in this circumstance
- Where the complaint is found to fall within the scope of this policy, the respondent will be notified that a complaint has been made and provided with details of the allegation at the appropriate stage alongside the screening panel outcome. Counter-allegations will be treated as a separate complaint.
- Both parties will be advised of the Screening Panel's composition before it convenes and may raise any conflict of interest within five working days

A member of staff may be accompanied by a trade union representative or work colleague (who is not a legal representative) at any stage of the following steps in the process.

Anonymous Reporting - Staff

Staff may make an anonymous report of a concern via email to inconfidence@thelir.ie. Anonymous reports will be reviewed by the Chair of the Equality and Diversity Committee, who will determine what action is possible. Formal investigation of an anonymous complaint may be limited by the absence of a named complainant, but all anonymous reports will be reviewed and acted upon where possible.

7B. Student Complaints Procedure

If someone raises a concern with you, about you:

Be open to the approach, understanding how difficult it can be for a person to speak up to raise the issue. If you do not agree with the person or accept that any change is necessary, consider how you, or you both, might best seek support in resolving the issue. Supports are available to you and are outlined in the policy.

If you see something you are concerned about:

We all should be aware of the safety and welfare of colleagues/classmates, even if we are not in a formal position of responsibility. We should always respect the privacy of others, however, if a concern arises for the welfare of a colleague/classmate, the matter should be raised with an appropriate person; the

Trinity DR&C Support Advisors or the Trinity DR&C Manager. Where a disclosure or reporting of any instance of inappropriate behaviour is made, transparency is ensured via this policy as to how the College deals with such matters. This policy should not justify unwanted interference in the affairs of another.

Postgraduate and Undergraduate Students - Informal Stage

Students who experience behaviour they consider to be bullying, harassment, sexual misconduct, or a related concern are encouraged to seek support in the first instance. Before deciding how to proceed, students may:

- Contact the Academic Administrator in confidence for advice and support
- Contact the Trinity DR&C Service for confidential information and signposting
- Contact the Trinity Student Union for support and guidance
- Keep a contemporaneous record of incidents, including dates, times, locations, what was said or done, any witnesses, and the impact

Informal resolution options include a facilitated conversation supported by the Academic Administrator or HR Manager and mediation (see Appendix A). Students are not required to pursue informal resolution before making a formal complaint.

Postgraduate and Undergraduate Students - Formal Stage

Students wishing to make a formal complaint should complete the Complaint Form and submit it to the HR Manager at hr@thelir.ie. The formal process: Screening Panel, investigation, outcome, etc., follows the same pathway as for staff. The Screening Panel is aligned with Trinity's DR&C process, and Trinity's DR&C Service may be engaged where appropriate.

A student may be accompanied by a Trinity Student Union representative or a fellow student (who is not a legal representative) at any stage of the formal process.

Short Course Participants - Informal Stage

Short-course participants who experience behaviour they consider to be bullying, harassment, or sexual misconduct should contact the Short Course Manager (shortcourses@thelir.ie) in the first instance. The Short Course Manager will listen without judgement; provide information on available options; and facilitate informal resolution where appropriate and with the participant's consent.

Short Course Participants - Formal Stage

Short course participants wishing to make a formal complaint should complete the Complaint Form and submit it to the HR Manager at hr@thelir.ie. The Screening Panel for short course complaints will be composed with appropriate regard to avoiding conflict of interest, and appeal lies with the Director of Administration & Company Secretary and CEO/Director (for complaints against students or tutors) or at Board level where appropriate.

7C. General Public Complaints Procedure

Informal Stage - General Public

Members of the general public who experience behaviour at or in connection with The Lir Academy that they consider to be a breach of the standards set out in this policy are encouraged to raise their concern directly with The Lir Academy by contacting the HR Manager at hr@thelir.ie or the Director of Marketing (see below). The person receiving the concern will acknowledge receipt, listen without judgement, provide information on available options, and seek to resolve the matter informally where possible.

Formal Stage - General Public

Where informal resolution is not possible or appropriate, a member of the general public may submit a formal written complaint to the HR Manager at hr@thelir.ie setting out: their name and contact details; the nature of the concern; the person(s) whose behaviour is complained of (if known); dates, times, and any witnesses; and any steps already taken to resolve the matter.

The HR Manager will acknowledge receipt within five working days and refer the complaint to the appropriate process. Where the complaint falls within the scope of the Equal Status Acts 2000–2018, the complainant will also be advised of their right to refer the matter to the Workplace Relations Commission, subject to the statutory time limit noted in Section 11.

The Lir Academy will respond to formal public complaints within 20 working days of receipt or will advise the complainant if additional time is required and provide an estimated timeframe.

8. The Formal Investigation Process

8.1 Appointment of Investigator

If appropriate, an external, independent investigator will be appointed by The Lir Academy in consultation with the HR Manager, Director of Administration & Company Secretary, CEO/Director and/or Board. The investigator will have no prior involvement in the complaint and no conflict of interest with any party. Both parties will be informed of the investigator's identity before the investigation commences and may raise any conflict of interest within five working days. In cases involving sexual harassment or sexual misconduct, The Lir Academy will endeavour to ensure that at least one investigator is of the same gender as the complainant, in line with best practice.

8.2 Terms of Reference

The appointed investigator will set out the terms of reference, The terms of reference will then be provided to all parties before the investigation commences. These will set out the scope of the investigation, the allegations to be investigated, the process

to be followed, and the expected timelines. Parties will be given reasonable time to consider documentation and will have an opportunity to respond.

8.3 The Investigation

The investigator will: meet separately with the complainant and respondent; take detailed statements; meet with relevant witnesses; review all relevant documentation; and provide both parties with an opportunity to review and respond to the evidence gathered. A written record of all meetings will be maintained. A neutral third party may be present to take notes. There should be no communication between the parties in relation to the complaint outside of the investigation process.

All parties attending investigation meetings may be accompanied by a trade union representative, student union representative, or work colleague (who is not a legal representative). Relevant witnesses will also be interviewed.

Counter-allegations made during the investigation will be treated as a separate complaint and will be addressed as such - they will not be conflated with the original complaint.

Interim precautionary measures may be put in place by The Lir Academy during the investigation period where necessary to protect the welfare of any party:

- For staff: a staff member against whom allegations are made may be placed off duty on full pay in order to facilitate a thorough and unimpeded investigation. Other precautionary measures may also be put in place in appropriate circumstances.
- For students: a student against whom allegations are made may, in appropriate circumstances, be suspended from attending campus or class participation in order to facilitate a thorough investigation.

NOTE: A precautionary measure is not a penalty or sanction and does not indicate that any conclusion has been reached that the person concerned has committed a breach of this policy or of disciplinary procedures.

If, during the formal investigation, the parties indicate they believe the matter could be resolved through mediation, the formal process may be paused to allow mediation to be explored, provided both parties agree. See Appendix A.

8.4 Out-of-Scope Complaints

Where the Screening Panel determines that the complaint does not fall within the scope of this policy, the Screening Panel will communicate this to the complainant in writing, setting out the reasons for the determination and outlining any alternative policy or procedure that may be appropriate to the matters raised. Consideration will be given to the fact that the individual has already completed a Complaint Form and that any relevant detail may be transferable to an alternative process. The respondent will not normally be notified of the complaint in this circumstance.

8.5 Investigation Report

On completion of the investigation, the investigator will produce a written report setting out their findings of fact, conclusions, and recommendations. The report will be provided to HR Management and/or the CEO/Director or Board. The complainant will be advised of the outcome of the investigation and whether there is a case to be answered. The complainant will not be informed of the specific disciplinary measures that may arise from the case.

8.6 Outcome and Action

Where the investigation finds that a breach of this policy has occurred, HR Management and/or Director or Board will determine the appropriate response, which may include:

- Disciplinary action against the respondent, up to and including dismissal for staff
- Disciplinary action under the relevant student disciplinary procedure
- Mediation or restorative practice
- Training or support measures
- Organisational or operational changes
- Post-investigation actions to support the rebuilding of professional relationships in the workplace or study environment

Where the investigation finds that no breach of this policy has occurred, both parties will be informed and advised of any further options available to them.

8.7 Malicious or Vexatious Complaints

A complaint made in good faith that is not upheld will not be treated as a malicious or vexatious complaint. A malicious complaint is one that is made without foundation and with malicious intent, where a person knowingly or without regard to the truth accuses another of bullying or harassment. Making a malicious complaint can have serious implications for the person making it, including disciplinary action where established. Those involved in the early assessment of a complaint should be mindful of context and that different people can bring different perspectives to the same event.

9. Appeal

Both the complainant and the respondent have the right to appeal the outcome of a formal investigation. An appeal must be submitted in writing to the HR Manager within 14 calendar days of receiving written notification of the outcome and must clearly set out the grounds for appeal. The other party will be advised that an appeal has been submitted.

The grounds for appeal are limited to: a material procedural error in the investigation process; new evidence that was not reasonably available during the investigation; or a finding of fact that is not supported by the evidence.

The Screening Panel will identify an appropriate person to conduct the appeal. The appeal decision is final and binding within The Lir Academy's internal processes. This does not affect any party's right to refer a matter to an external body.

10. Timelines

Acknowledgement of formal complaint	Within 5 working days of receipt of completed Complaint Form
Screening Panel convened	Within 15 working days of receipt of completed Complaint Form (subject to availability of panel members)
Screening Panel determination	Within 10 working days of the panel meeting
Investigator appointed	Within 10 working days of Screening Panel recommendation to investigate
Investigation completed	Will depend on complexity; parties will be kept informed of progress and any delays
Outcome notified to parties	As soon as reasonably practicable following receipt of investigation report
Appeal submitted	Within 14 calendar days of outcome notification
Appeal outcome	Within 20 working days of appeal submission

These timelines are indicative. Formal investigations are complex and their duration will depend on the number of parties, availability of witnesses, and the nature of the allegations. All parties will be kept informed of progress and any expected delays.

11. Statutory Rights and External Bodies

This policy does not limit any person's statutory rights. Individuals retain the right at all times to:

- Report conduct that may constitute a criminal act to An Garda Síochána
- Make a complaint to the Workplace Relations Commission under the Employment Equality Acts 1998–2015 or the Equal Status Acts 2000–2018
- Make a complaint to the Data Protection Commission in respect of data protection matters

IMPORTANT — STATUTORY TIME LIMITS

Your right to make a complaint to the Workplace Relations Commission (WRC) under the Employment Equality Acts or the Equal Status Acts is subject to a

statutory time limit of six months from the last act of discrimination or harassment. This time limit is not paused or extended by the existence of an internal workplace or institutional investigation — it continues to run. If you are considering a WRC complaint, you should seek independent legal advice without delay.

Contact: Workplace Relations Commission | www.workplacerelations.ie | Lo-call: 0818 80 80 90

12. Rights and Supports for the Respondent

A person against whom a complaint is made ('the respondent') has the right to: be informed that a complaint has been made and of the general nature of the complaint; receive details of the specific allegations at the appropriate stage; respond fully to all allegations; be accompanied at any stage; be treated with dignity and respect throughout; and access support, including the EAP for staff. The presumption of innocence applies throughout. Respondents are reminded that retaliation against a complainant, witness, or any person connected with the complaint is itself a serious breach of this policy.

13. Complaints Involving External Parties

Where a complaint is made against a person who is not employed by or enrolled at The Lir Academy, for example, a freelance tutor, contractor, or visitor, The Lir Academy will take all reasonable steps to address the complaint within its sphere of influence. This may include terminating or suspending the engagement of a contractor or freelance tutor, excluding a visitor from premises, or referring the matter to the relevant external body or the respondent's employer. The Lir Academy will also consider its obligations under the Equal Status Acts 2000–2018 where a complaint is made by a member of the public or a service user.

14. Safeguarding and Welfare

The Lir Academy is committed to the safety and welfare of all persons who engage with the Academy. Where a complaint or concern raises a child protection or vulnerable adult concern, The Lir Academy will follow its obligations under the Children First Act 2015 and the National Vetting Bureau (Children and Vulnerable Persons) Act 2012. Any member of staff or student who has a concern about the safety or welfare of a child or vulnerable adult should contact the Designated Liaison Person (DLP) or, where there is an immediate risk, An Garda Síochána directly.

15. Data Protection and Records

All personal data processed in connection with a complaint under this policy will be handled in accordance with The Lir Academy's Data Protection Policy, the GDPR, and the Data Protection Acts 1988–2018. Personal data will be: processed only for the purposes of managing the complaint and any associated process; shared only on a need-to-know basis; and retained in accordance with The Lir Academy's Retention Schedule.

The Lir Academy will gather and maintain appropriate statistical data in relation to contacts, disclosures, and formal complaints under this policy. An anonymised report will be produced annually and presented to the Board of Directors. This data will be used to identify themes, inform training and awareness initiatives, and support the continuous improvement of the policy and its implementation. Individual data will remain confidential throughout.

Individuals have the right to access personal data held about them in connection with a complaint, subject to applicable exemptions under the Data Protection Acts 2018. Requests should be directed to the HR Manager at hr@thelir.ie.

16. Training and Awareness

The Lir Academy will ensure that all staff receive training on this policy and on their obligations under it, including on induction and periodically thereafter. Staff with specific responsibilities under this policy — including managers and those involved in investigating complaints — will receive appropriate specialist training.

This policy will be communicated to all students at enrolment and to short course participants at the commencement of their programme. It will be published on The Lir Academy website and made available on request.

17. Policy Review and Monitoring

This policy will be monitored by the Director of Equality and Diversity, Director of Administration & Company Secretary, Director of Marketing, and reviewed annually by the HR Manager, or sooner in the event of changes to applicable legislation, Codes of Practice, or Trinity's Dignity and Respect Policy. Proposed amendments will be approved by the Board of Directors.

18. Legislative and Policy Framework

- Employment Equality Acts 1998–2015
- Equal Status Acts 2000–2018
- Safety, Health and Welfare at Work Act 2005
- Work Life Balance and Miscellaneous Provisions Act 2023

- Industrial Relations Acts 1969–2015
- General Data Protection Regulation (EU) 2016/679
- Data Protection Acts 1988–2018
- Children First Act 2015
- National Vetting Bureau (Children and Vulnerable Persons) Act 2012
- IHREC Code of Practice on Sexual Harassment and Harassment at Work
- HSA Code of Practice for Employers and Employees on the Prevention and Resolution of Bullying at Work
- Trinity College Dublin Dignity and Respect Policy (Revision 5, November 2023)
- aligned, not binding on Lir Academy staff

Key Contacts

HR Manager — The Lir Academy	Sreeja Ghosh - hr@thelir.ie
Academic Administrator	Colm Carney - colm.carney@thelir.ie
Short Course Manager	Leonor Madureira - shortcourses@thelir.ie
Director of Access & Equality	Shaz Oye – shaz.oye@thelir.ie
Director of Administration & Company Secretary	Anne Fitzpatrick – anne.fitzpatrick@thelir.ie
Director of Marketing	Jessica Hilliard – jessica.hilliard@thelir.ie
Director of The Lir Academy	Gemma Bodinetz – gemma.bodinetz@thelir.ie
Chair of the Board of Directors	James Hickey – chair@thelir.ie
Confidential anonymous reporting	inconfidence@thelir.ie
Trinity DR&C Service	www.tcd.ie/hr/dignity-and-respect
Trinity Data Protection Officer	dataprotection@tcd.ie
Lir Academy Data Protection Officer	Anne Fitzpatrick – anne.fitzpatrick@thelir.ie
Employee Assistance Programme (EAP)	Lena by Inspire - https://lenabyinspire.com

Workplace Relations Commission	www.workplacerelations.ie Lo-call: 0818 80 80 90
IHREC	www.ihrec.ie Tel: 01 858 9601
Data Protection Commission	www.dataprotection.ie Tel: +353 (0)57 868 4800
An Garda Síochána (emergency)	999 / 112

Appendix A — Mediation and Facilitated Conversation

A.1 Mediation

The Lir Academy supports the use of mediation as an informal method of resolving complaints. Mediation is a voluntary, confidential, and impartial process through which a trained mediator helps the parties in a dispute to talk about the issues between them and, if they wish, to reach an agreement that is acceptable to both sides.

Both parties must be willing to take part in mediation and agree to the appointment of a mediator. If the parties agree to this approach, The Lir Academy will appoint a neutral and independently trained mediator to facilitate the process. The mediator will be experienced, trained, and will be independent of The Lir Academy and of both parties.

Mediator's role	To set up and sign terms of reference with the parties; to set up meetings and venue; to facilitate open discussion; to help parties explore issues and solutions; to mediate towards a resolution; to maintain confidentiality. The mediator does not hand down a solution, does not make decisions for the parties, does not take sides, and is in charge of the process but not the outcome.
Role of the parties	To volunteer for mediation and sign the terms of reference; to engage genuinely and openly in the process; to attempt to find a mutually acceptable resolution; to maintain strict confidentiality.
Process	The parties are advised of mediation as an informal option. On agreement, a mediator is appointed. The mediator contacts both parties directly to arrange meetings. Meetings are held in a quiet, private, neutral space.
Confidentiality	Matters discussed in mediation are strictly confidential and conducted on a without-prejudice basis. Participants agree not to compel the mediator to disclose matters discussed in mediation, including in any legal or workplace relations forum. No information about a mediation will be held on an employee's or student's record unless otherwise agreed by all parties. Any written outcomes will be agreed by all parties.
If no resolution	If no resolution is found, it is up to the parties to decide on next steps. The complainant may wish to proceed through the formal complaints procedure.
During investigation	If, during a formal investigation, parties indicate they believe the matter could be resolved through mediation, the formal process may be paused to allow mediation to be explored, provided both parties agree. If mediation is unsuccessful, the formal investigation will recommence.

Cost

There is no cost to participants.

A.2 Facilitated Conversation

A facilitated conversation is an informal process in which an independent third party facilitates dialogue between the parties. It is distinct from mediation in that it focuses on enabling the parties to speak freely to each other about the impact of the alleged behaviour, rather than on reaching a formal agreement. It is held in a neutral venue and both parties must be willing to take part.

A facilitated conversation may be provided by a suitably skilled member of staff, a specialist, or external support, as agreed by the parties. The process is voluntary, confidential, and without prejudice.

Appendix B — The Screening Panel**B.1 Role of the Screening Panel**

The Screening Panel's role is to:

- Make an evidence-based determination as to whether the alleged behaviour falls within the definition of bullying, harassment, or sexual misconduct as outlined in this policy
- Make recommendations in relation to informal resolution options where appropriate, recognising that proceeding to formal investigation is not automatic
- Assess the impact of any delay in bringing the complaint forward on the likelihood of a fair investigation being carried out, considering: the circumstances of the alleged complaint; its complexity; the cause of the delay; and the possibility of prejudice to the respondent
- Outline their determination in writing and where the complaint does not fall within the scope of this policy, set out reasons and signpost the complainant to alternative appropriate processes
- Where relevant, make a recommendation to the HR Manager or CEO/Director that precautionary measures should be considered

B.2 Composition

The Screening Panel, where appropriate, will be composed of persons external to The Lir Academy and free from any conflict of interest in relation to the complaint. Where The Lir Academy is a named respondent in a complaint, all panel members must be external. Gender representation will be considered in the composition of the Screening Panel where appropriate. Members of the Screening Panel will have appropriate training in relation to bullying, harassment, and sexual misconduct.

Both the complainant and the respondent will be advised of the proposed Screening Panel composition before the panel convenes and may raise any conflict of interest within five working days.

B.3 The Screening Panel Decision

The Screening Panel will make its determination based on the written complaint submitted. It reserves the right to seek clarification from the complainant on any aspect of the complaint. Where more than one policy or procedure may be applicable to the matters raised, the Screening Panel will determine which should have priority or be most appropriate in the circumstances. Decisions made by the Screening Panel are not a predetermined outcome of any subsequent investigation - an investigator may reach a different conclusion having received further information not available to the Screening Panel.

The HR Manager will notify the complainant in writing of the outcome of the screening determination within 10 working days of the Screening Panel meeting. Where the complaint is to proceed to formal investigation, the respondent will then be notified within 10 working days and provided with the Complaint Form, the policy, the Screening Panel's determination, and details of the investigation process.

The Lir, National Academy of Dramatic Art | Trinity College Dublin

Dignity and Respect Policy | Revision 1 | June 2026 | Review: June 2027

This policy replaces the Harassment and Bullying Policy 2024.

This document is a working document and subject to updates. Feedback is welcome to hr@thelir.ie