

Director of HR
University of Warwick
University House
Coventry

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Cc: Sir Normington
Chair of the Council of the University

February 11, 2020

Dear Madam,

Following eight (8) requests for Professor Sander's written allegations since my unlawful and wrongful suspension by the Provost of the University of Warwick, Professor Ennew, on Thursday 16 January 2020, Professor Lavender forwarded to me a thread of communications on Friday 31 January 2020, that is, 15 days following Professor Ennew's suspension letter. This included an undated email communication ('the complaint') Professor Sanders sent to HR.

I replied to Professor Lavender and Sir Normington on the same day (Friday, 31 January 2020) and this email communication is included below and forms part of my grievance. I did not have time then to tender a second grievance against Professor Sanders because I had a flight on the following day. It is submitted now (- the first grievance was submitted on 6 January 2020).

Professor Sanders has committed serious acts of gross misconduct (- these are outlined below) and behaved, once more, dishonestly and with lack of integrity in order to victimise me and to cause serious injuries to me, that is, to his colleague, mentee and, in the light of the reference he forwarded to Warwick University before my job interview in 2012, his friend.

Professor Sanders is well aware the neither the Student Complaints procedure of the University nor the Dignity at Warwick Policy permits a head of department to write complaints/allegations on behalf of a student. Both policies require the written statements of students as complainants (see 6.1 and 6.2 of the Dignity at Warwick) and no student had tendered any complaint. They had no reason for doing so. The reason as to why no one is permitted to write 'hearsay'

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statements and unsubstantiated opinions on behalf of another is because the policies do not leave room for breaches of natural justice, deliberate falsehood, prejudice, malice, discrimination and sycophancy. Professor Sanders intentionally did not follow the procedures of the University and proceeded to write a complaint for Ms Opik in order to make libellous statements which would cause me substantial harm.

I will not engage with the low level displayed by the content of Professor Sander's email communication, here; I refer you to my email communication to Professor Lavender and to Sir Normington of 31 January 2020 which is included.

It will suffice to note that Professor Sanders's statements were made with actual malice – namely, with knowledge that they were false (- my communication with Ms Opik did not disclose harassment; in fact, Professor Sanders has seen the HR Notice in the kitchen of the law school on what harassment means) and with reckless disregard of whether they were false or not (- this applies to the statements he made regarding Ms Opik's unsubstantiated hearsay concerning student x and his own embellishment of that uncorroborated hearsay).

Maliciously making false allegations and intentional and unwarranted statements violating the dignity of a professor, her honour, reputation and professional integrity in order to procure a suspension is not only unethical and unlawful behaviour but also gross misconduct.

Professor Sanders has engaged in sycophancy.

He also breached tort law (libel) and equality law.

In addition, he breached his duties in terms of the pursuit of truth, fairness and the duty of care.

Accordingly, he caused concrete harms (the suspension) and mental suffering and distress through an act which is wrongful in itself and in violation of standard procedures in all Universities in the UK and Europe. He has damaged my professional standing within the department and beyond, my relation with 11 supervisees and foiled my delivery of a course to more than 100 students, who had explicitly chosen it for a number of reasons, including employability.

He also displayed complete disregard for my fundamental rights (he acted in breach of Articles 1 and 8 EUCFR, Article 12 UDHR and Article 8 ECHR), the prohibition of victimisation (breach of the Equality Act and the policies of the University, that is, the Dignity at Warwick and the Grievance Procedure which prohibits the victimisation of the person who activated it,

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health and safety regulations (and the Health and Safety Act 1974) and the duty of care and, finally, for the contractual duties he has to observe natural justice.

All the above breaches fall within the ambit of gross misconduct (see Appendix 1 of the Disciplinary Policy) and I believe that the University of Warwick has to activate its disciplinary policy, irrespective of my grievance.

Thus far, it has punished the person who was wronged by Professors Sanders and Ennew thereby inviting reasonably held beliefs that it operates its disciplinary policy inconsistently, unfairly and in a discriminatory manner (see ACAS's guidance).

Abuses of power and intentionally not following standard procedures in order to abridge protected freedoms and damage an employee, who has a legal case before the courts and has submitted a grievance against Professor Sanders, through defamatory falsehood cannot but turn the Warwick Law School into a victimisation project.

In such circumstances, I have the right to protection and request the University to right the wrongs Professor Sanders and Professor Ennew have committed immediately and to rectify all the serious injuries inflicted upon me.

The Disciplinary Policy of the University of Warwick does not confer upon Professor Sanders, and/or Professor Ennew, an unrestricted and unbridled licence for every possible attack upon the dignity of another employee and the abridgment of her rights, including her rights to health and well-being, to exercise her profession and teach her students and to an undisrupted and peaceful enjoyment of her private and family life.

I look forward to hearing from you.

Yours faithfully,

Professor Dora Kostakopoulou

PS: I have prepared letters for 140 students who have been affected by my total banishment from the University of Warwick. Please inform me about the process of delivering those letters to my students.

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