

Dignity at Work Policy - Addressing Harassment and Bullying

Ownership

Document Ownership	
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Ratified:	JNCC 11.06.25

Version Control

Version Control Table

All changes to this document are recorded in this table.

Date	Title	Officer
Sept 2023	V2 – Annual Policy Review	TA/RH
Aug 2025	V4 – Branding updated, included reference to glossary of terms for OFS E6 Definition and consistency of language with other policies and combined Harassment Policy with Dignity at Work.	TA

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1. Statement of Commitment

At the University of Lancashire, we are committed to working towards creating a climate in which all colleagues are treated fairly with dignity and respect.

We will aim to:

- Ensure the dignity at work of all our colleagues
- Respect and value difference
- Make full use of all the talents of all our workforce
- Prevent acts of discrimination, exclusion, unfair treatment, and other negative or demeaning behaviours
- Demonstrate our commitment to equality, diversity and inclusion for all as set out in our [EDI Policy](#) and [Belonging At the University of Lancashire](#) (the University's Equality Diversity and Inclusion strategy)
- Be open, constructive and compassionate in our communications
- Handle conflict quickly and decisively
- Be fair and just in everything we do
- Support our colleagues to develop positive behaviours and work to eliminate negative behaviours.

2. Academic Freedom, Freedom of Speech within the law and Inclusion

The University of Lancashire has a [Code of Practice to ensure freedom of speech](#), which is underpinned by its founding documents and commitment to academic freedom. Academic freedom protects the intellectual independence of academics, allowing them to question, test, and share new or controversial ideas without fear of job loss or disciplinary action.

This university respects the rights and freedoms of individuals, including the right to express their views freely, even if those views are controversial or unpopular. The code also emphasises the importance of maintaining a safe and respectful environment for all members of the university community.

We are committed to ensuring that staff or students are not prevented from discussing their experiences of harassment or sexual misconduct. As such, the University of Lancashire does not use non-disclosure agreements (NDAs) or confidentiality clauses to prevent reporting staff or students from speaking out in cases of harassment or sexual misconduct. It is important that all our students and staff feel safe and supported and the use of such clauses would be considered to be wholly unacceptable.

3. Roles and Responsibilities

Employee Responsibilities

You are responsible for ensuring that your own behaviour is appropriate. Below is a list of responsibilities for all colleagues to adopt, that can help prevent harassment and bullying.

- be aware of this policy statement and comply with it.
- set a positive example by treating others with respect and refer to the university's [Equality, Diversity & Inclusion Policy](#) alongside the Belonging Strategy
- value diversity and ensure all colleagues feel included and respected, regardless of background or role
- be mindful of others' workloads, stress levels and emotional wellbeing and encourage open conversations and signpost support where needed
- maintain professional boundaries,
- take care that jokes, banter, sarcasm are not potentially hurtful to others
- be mindful of body language – what an individual finds acceptable in terms of personal space, for example
- do not make personal comments, and take care not to make casual remarks which could be insensitive to issues individuals may be facing in private
- do not accept behaviour that may be offensive when directed against you or others, and/or take positive action to ensure that it is challenged and/or reported, where safe to do so
- don't act on assumptions which may make others feel excluded
- be supportive of colleagues who may be subject to bullying and/or harassment.

Manager Responsibilities

In addition to the above responsibilities, managers have the following responsibilities in order to establish and maintain a work environment free of harassment and bullying.

- communicate with people privately, in a professional manner, as soon as a problem occurs, promoting clarity, kindness and openness in all team communications
- have early conversations about reasonable adjustments etc, given that failure to do this can lead to accusations of harassment and/or bullying as part of grievances

- explain the reason for deadlines and timescales for work, and discuss them, ensuring that all involved are aware of the requirements for the work to be completed
- set a positive example by treating others with respect and setting standards of acceptable behaviour
- promote a working environment where harassment is unacceptable and not tolerated
- treat any complaint seriously, acknowledging and acting on concerns raised about harassment and bullying and supporting colleagues experiencing these types of incidents.
- tackle, and where possible, resolve incidents of harassment or bullying
- consider the diverse needs of individuals when planning events / meetings using compassionate communications
- consult the People Team or the Equality, Diversity and Inclusion Team for advice and support

4. Definitions of Harassment and Bullying [OFS]

Harassment has the meaning given in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997 (in its entirety, and as interpreted by section 7 of the Act), meaning, that harassment suffered by all students and staff is within scope, rather than only by reference to protected characteristics under the 2010 Act.

Harassment is unwanted physical, verbal or non-verbal conduct which may (intentionally or unintentionally) violate a person's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment which interferes with an individual's learning, working or social environment. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past. Harassment often involves repetitive actions or behaviours that violate a person's dignity or create a hostile atmosphere.

Harassment may involve sexual harassment or be related to gender or a protected characteristic such as age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation. Harassment can take place on and off-line.

Sexual harassment is defined as any unwanted behaviour of a sexual nature which violates your dignity, makes you feel intimidated, degraded or humiliated, or creates a hostile or offensive environment.

Sexual harassment occurs when someone is subjected to unwanted conduct of a sexual nature which has the purpose or effect of either violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Third party harassment occurs where a person is harassed or sexually harassed by someone who does not work for the University but with whom that person has come into contact with during their employment or studies.

Bullying is intimidating, hostile, degrading, humiliating or offensive behaviour, through means which have the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, or humiliating environment. Bullying usually involves a repeated course of conduct and includes online bullying.

Cyberbullying or cyber-violence is online behaviour that constitutes or leads to harm against the physical, psychological and/or emotional state of an individual or group using digital technology. It includes stalking, unwanted advances, online harassment, non-consensual sharing of sexual images and non-consensual sharing of private information.

Bystander or an 'active' bystander is a person who witnesses prejudice or discrimination against another person and who has the opportunity to take action by challenging the behaviour. An active bystander is someone who notices and takes action to stop potential harm or violence. For example, by intervening, if it is safe to do so, or getting help, reporting or caring for the victim.

The [Office for Students \(OFS\) definitions](#) for harassment, sexual misconduct and bullying have been used in this Policy. Within this policy the term 'staff', 'colleague' and 'employee' are used interchangeably.

The OFS define staff as: includes but is not limited to employees (whether permanent, fixed-term or temporary) and all other individuals engaged by the University or acting on its behalf, including senior managers, officers, directors, consultants, contractors, trainees, seconded staff, homeworkers, casual workers, volunteers, interns, agents and sponsors.

4. Protection from Victimisation

The university will not tolerate any form of victimisation against a colleague who has raised or supported an informal complaint, co-operated in a formal investigation, challenged inappropriate behaviour, or in each case is believed to have or is believed to be likely to take such steps. This includes behaviour targeting a colleague's career progression, such as deliberately providing unbalanced or overly negative references or blocking opportunities for that colleague to participate in workshops and other development activities.

If a formal complaint of victimisation is made about a colleague's behaviour it will be fully investigated and, if upheld, will be dealt with in accordance with the relevant Disciplinary Procedure.

5. Examples of Behaviours which could constitute Harassment

- Offensive gestures, language, gossip or jokes
- Insulting or abusive behaviour or comments
- Unwanted physical interaction that is not consensual and makes you feel uncomfortable or threatened. This can include an invasion of personal space, inappropriate touching, or physical violence, recognising that sensory sensitivities and personal boundaries are different for everyone, including those who are neurodiverse, and it is important to respect comfort levels and boundaries at all times.
- Display or circulation of sexually suggestive, racist or otherwise offensive material
- Persistent unwanted isolation or exclusion
- Persistent unwanted attention
- Intrusion by pestering, spying or stalking
- Humiliating or demeaning criticism
- Body shaming or offensive comments related to someone's weight, height or physical appearance
- Sexist jokes, racist jokes, or jokes about an individual's disability, sex, ethnicity or religion, for example
- Offensive or intrusive behaviour relating to a person's disabilities or mischievous interference with personal aids or equipment
- Refusing to acknowledge someone's gender or identity, including refusing to use their preferred pronouns
- Repeated and escalating micro-aggressions, which are subtle, often unintentional actions, comments or environments that reinforce stereotypes and lead to "everyday exclusions," making people feel unwelcome because of

their identity, like race, ethnicity, gender, sexual orientation, disability, age, religion, or socioeconomic status

- Derogatory assumptions or comments based on age, such as suggesting someone is too old or too young to contribute effectively
- Discrimination, exclusion, or offensive comments relating to someone's role as a parent or carer, including assumptions about reliability or commitment
- Offensive or dismissive comments about neurodivergent traits or conditions, such as autism, ADHD, dyslexia, or Tourette's' mocking or stimming, communication differences, or support needs.
- Offensive references to a person's race, ethnicity, skin colour, religion or nationality, dress, culture, background or customs
- Making it unnecessarily difficult for people to conform to their religious beliefs, making assumptions based on belief, e.g. persistently offering inappropriate food or drink
- Perpetuating negative stereotypes e.g. making antisemitic remarks, spreading Islamophobic conspiracy theories, or using misogynistic language
- Treating someone as inferior because of their sex e.g. misandrist behaviour.
- Offensive comments about someone's sexuality, including homophobic or biphobic remarks, insults or threats, or displaying homophobic or biphobic materials
- 'Outing' or threatening to 'out' someone as gay, lesbian, bisexual or trans
- Degrading, humiliating or abusive activities as part of any 'hazing' or initiation ceremony

6. Examples of Behaviours which may constitute Sexual Harassment

A person can be sexually harassed by someone of the same or different sex. Sexual harassment can include, for example:

- unwanted physical conduct of a sexual nature, including touching, pinching, pushing and grabbing, invading personal space, groping, tugging or lifting someone's clothing, and more serious forms of sexual assault.
- unwanted relationship attempts.
- continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome.
- sending or displaying material that is pornographic or that some people may reasonably find offensive (including emails, text messages, social media content, video clips and images sent by mobile phone or posted on the internet)
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); sexual jokes; remarks or comments about

someone's body or appearance; sexual derogatory comments about women or men; innuendos; wolf whistling; or stalking.

A person can be sexually harassed even if they are not the intended target.

7. Examples of Behaviours which could constitute Third-party harassment

Third-party harassment could include, for example:-

- Unwelcome sexual advances from a supplier visiting the university premises,
- A person visiting a supplier's premises or other location in the course of their employment or studies using threats or intimidating language
- A delivery driver using aggressive behaviour
- A client in a meeting or at a conference using inappropriate jokes, teasing or unwanted 'banter'
- A contractor working on the premises sharing unsolicited images or videos, unwelcome sexual advances, repeatedly asking you on a date or unwanted physical touch
- A student mocking a Lecturer due to their sexual orientation, race, religion or any other protected characteristic
- A student repeatedly targeting a colleague with unwanted friend requests or messages.

8. Examples of Behaviours which could constitute Bullying

Bullying is a particular form of personal harassment and may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Examples of bullying include:

- Spreading harmful rumours about someone
- Insulting someone with words or behaviour
- Not allowing someone to go on training courses, but allowing someone else to
- Giving someone a heavier workload than another colleague
- Publicly ridiculing or demeaning someone
- Treating someone unfairly by excluding or victimising them
- Overbearing supervision or misuse of power that makes the person feel uncomfortable

9. Examples of Behaviours which could constitute Cyberbullying

The most common places where cyberbullying occurs are:

- Social Media, such as Facebook, Instagram, Snapchat, and Tik Tok
- Text messaging and messaging apps on mobile or tablet devices
- Instant messaging, direct messaging, and online chatting over the internet
- Online forums, chat rooms, and message boards
- Email
- Online gaming communities

10. Aggravating Factors

In assessing cases of bullying, harassment, or related misconduct, the university recognises that certain aggravating factors may increase the severity of the behaviour and its impact. These factors will be considered when determining the appropriate course of action, including any disciplinary measures or support required.

The following are examples of aggravating factors that may be taken into account:

10.1 Abuse of Power or Position

Where the behaviour involves a misuse of authority—such as a manager, supervisor, or senior colleague exerting undue influence over a more junior colleague—this will be regarded as particularly serious due to the inherent power imbalance and potential for coercion.

10.2 Repetition or Pattern of Behaviour

Repeated incidents, or evidence of a persistent pattern of conduct over time, may indicate intent and are likely to cause cumulative harm. This behaviour is considered more serious than isolated incidents.

10.3 Discrimination Related to Protected Characteristics

Conduct which targets an individual based on a protected characteristic such as age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation may constitute unlawful discrimination, harassment, or victimisation under the **Equality Act 2010** and will be treated as a serious breach of this policy.

10.4 Victimisation Following a Complaint

Any action that seeks to penalise or disadvantage an individual for raising a concern or supporting another person's complaint—whether directly or indirectly—will be considered an aggravating factor.

10.5 Impact on Health and Wellbeing

Where there is evidence that the behaviour has had a significant negative impact on your mental or physical health (e.g. stress, anxiety, depression), this will be taken into account in assessing the seriousness of the case.

10.6 Public or Humiliating Conduct

Harassment or bullying that occurs in a public setting, is widely disseminated (e.g. via email or social media), or causes public embarrassment or humiliation will be regarded as more serious due to the wider and more lasting impact.

10.7 Retaliation or Intimidation

Any attempt to intimidate or retaliate against a complainant, witness, or colleague involved in a complaint process is a serious breach of trust and may result in disciplinary action.

10.8 Lack of Remorse or Cooperation

A failure to cooperate with investigations, a lack of insight into the impact of the behaviour, or a refusal to acknowledge wrongdoing may be considered as indicators of ongoing risk.

11. What to do if you feel you have or are being harassed or bullied

If you feel that you are being subjected to harassment or bullying, do not feel that it is your fault or that you have to tolerate it. The university's primary concern is that you should receive appropriate support, assistance, and confidential advice.

Both informal and formal options are available in the university's [Resolution Policy](#) and [Disciplinary Procedure](#) to resolve issues.

Informal approaches are intended to help resolve one-off or minor incidents of inappropriate behaviour, to stop such behaviour early and to prevent it escalating. They include:-

- A direct informal resolution process
- An informal resolution process with support from the People Team
- Mediation and/or facilitated conversations.

This type of collaborative approach has been found to be the most effective way of resolving conflict, tackling inappropriate behaviour and minimising negative impact on the individuals involved, where it is felt appropriate to do so.

11.1 Informal Resolution

- Act promptly; do not wait until working conditions become intolerable
- Keep a diary of all incidents – relevant dates and times, locations, what was said, etc.
- Keep copies of any correspondence that may be relevant, for example reports, letters, memos, notes of any meetings that relate to you.
- In some instances, it may be possible for the complaint to be resolved quickly by explaining directly to the harasser the effect their behaviour is having and that you want it to stop. However, this will depend on a number of factors, e.g. power dynamics and the impact that the harassment has had on you and whether you feel it is safe for you to try to resolve the situation yourself
- In some cases, the person against whom you have a complaint may be unaware that their behaviour is inappropriate or unacceptable, or it may happen that their words or actions have been misinterpreted. In such cases, the misunderstanding needs to be cleared up speedily
- Where you feel comfortable, you should make it clear that if it continues you will make a formal complaint.
- If the behaviour of a person is aggressive it may be necessary to walk away making it clear you do not wish to be spoken to in that way.
- If you do not feel able to raise your concerns with the person directly, you could write to them stating that you feel harassed, state where and when this occurred and how you wish to be treated. Always keep a copy.

11.2 Counselling

If you believe you are being bullied or harassed, it may be helpful for you to contact the Staff Counselling service. Counselling provision is on an entirely confidential basis and is available to all members of staff. Information about further sources of support is available on the [People Team Wellbeing](#) pages.

11.3 Trade Unions

Discuss any concerns you have with your Trade Union representative who can support and advise you.

12. Formal Resolution

If the informal steps have not been successful, or are not appropriate, you should speak to your line manager or contact the People Team who will discuss with you how best to raise a formal grievance through the [Resolution Policy and Procedure](#).



Alternatively, you can complete the [RS1 form](#) and submit it to resolution@uclan.ac.uk

It may be appropriate, where possible, to take account of the nature of the issues involved in the complaint being made when determining who should investigate the grievance – for example in cases of sexual harassment, racial harassment, etc. as the university has a number of specially trained investigators for such matters.

If, as a result of the investigation, it is identified that there is a case to answer, the university's [Disciplinary Procedure](#) will be invoked where appropriate. The disciplinary procedure may also apply in cases where the complaint of harassment or bullying, or the complainant's behaviour, is deemed to be malicious or mischievous.

13. Raising Concerns Anonymously

As well as, or instead of raising issues for resolution informally or formally, colleagues, students and visitors of the university can report any type of bullying, harassment, discrimination or victimisation to the university using [Report and Support](#) for staff and students.

14. Raising complaints of serious sexual misconduct

If you have experienced serious sexual violence, such as sexual assault, violence or rape, it is important you feel supported. You also have a choice in what you do next and what is right for you.

Often a grievance process will not be appropriate in response to a complaint of serious sexual misconduct. When you have disclosed an incident of serious sexual misconduct and consented to that disclosure being treated as a complaint, careful consideration will be given to the most appropriate process for dealing with that complaint, whether through the relevant Disciplinary or Resolution policy.

If you are approached for advice and support by an individual who experienced serious sexual misconduct, you should contact Student Wellbeing Team, where the disclosure is from a student, or your line manager, a member of the People Team or a Sexual Violence Liaison Officer for advice where the individual is a staff member. This includes supporting colleagues who have very recently experienced serious sexual misconduct and may need immediate medical attention, as well as supporting those in non-emergency situations.

15. What to do when you are the subject of concerns being raised

It can be an upsetting experience for anyone who is approached and told that their behaviour could be construed as inappropriate. If this is done through an informal process, you should be prepared to listen patiently and calmly and allow the colleague (or the person supporting them in the process) to express their concerns. If it is possible, they should also try to remedy the situation and allow a positive working relationship to be resumed. You should keep a note of any discussions.

The person who is the subject of the complaint should also be able to give an account of what happened as part of any informal and formal resolution processes.

16. What happens if you have harassed or bullied someone

While this Policy emphasises the value of an early informal resolution process, there will be situations that can only be resolved through the formal part of the Resolution Procedure. Where a formal grievance is brought and upheld against an individual and the nature of the harassment or bullying warrants it, the matter may be referred to the Disciplinary and Dismissal Procedures. This may result in a formal warning being issued to the person who has been harassing or bullying you and training or other interventions may also be recommended.

17. How we will support you

The university is committed to providing support for anyone affected by these issues. The following support resources are available to any colleague whether they are considering raising an issue about harassment or bullying, actually disclosing an incident, or the subject of a complaint.

Confidential support can be accessed from the People Team, a Mental Health Champion or a Sexual Violence Liaison Officer on issues relating to bullying, harassment, discrimination and sexual misconduct, or where a colleague is seeking help where they have been subjected to sexual misconduct, including sexual assault or rape.

Talking confidentially to a member of one of the university's Diversity Network Groups may also be helpful, particularly if the harassment or bullying is perceived to be due to a protected characteristic.

Information about further sources of support is available on the university's Single Comprehensive Source of Information.

18. Confidentiality

Confidentiality and trust are critical when dealing with allegations of harassment and bullying. Details of the complaint (including the names of the person making the complaint and the person accused) must only be disclosed on a 'need to know' basis. Breach of confidentiality in either an informal or formal resolution process may give rise to disciplinary action under the university's Disciplinary Procedure.

19. Related Policies and Guidance

[Resolution Policy](#)

[Social Media Policy](#)

[Disciplinary Procedure](#)

[Dismissal Procedure](#)

[Suspension Procedure](#)

[Staff and Student Personal Relationships Policy](#)

[Single Source of Information](#)