



Dignity at Work Policy - Summary

The College's Dignity at Work Policy is a policy document outlining Christ's College's commitment to fostering a workplace and community where all individuals are treated with respect, value, and courtesy, free from bullying, harassment, discrimination, and victimisation.

It sets out acceptable behaviours and provides a clear framework and procedures for addressing complaints and resolving issues related to a lack of dignity, promoting a safe, inclusive, and respectful environment for all.

Sections:

1. Statement of Policy (p2)
2. Purpose of this Policy (p3)
3. Who is this Policy for? (p3)
4. Roles and Responsibilities (p4)
5. What Constitutes Inappropriate Behaviour? (p5)
6. Code of Behaviour (p9)
7. What to do when you have Experienced Inappropriate Behaviour (p11)
8. What to do when you are the Subject of Concerns being Raised (p15)
9. What Happens if you have Behaved Inappropriately (p16)
10. How we will Support You (p16)
11. Training and Development Opportunities (p18)
12. How to Raise Complaints not Directly Covered by this Policy (p19)
13. Third Party Harassment (p19)

Refer also to the Dignity at Work Statement and Protocol which outlines the College's protocol to protect members of staff and Fellows in the event of abusive, inappropriate or intimidating communication and/or behaviour, including sexual harassment, by third parties.

1. STATEMENT OF POLICY

1.1 Christ's College is committed to creating and maintaining a safe, welcoming and inclusive community that nurtures a culture in which we treat one another with courtesy and professionalism, even while enabling the challenge of each other's views and opinions. There is no place for bullying, harassment, discrimination, sexual misconduct, or victimisation in our community; they will not be tolerated and are unlawful. Each of us is responsible for the way we interact with and treat others. By fostering and maintaining a culture of courtesy and professionalism in the workplace, we strengthen academic freedom and freedom of thought by ensuring that all voices can be heard clearly and all views discussed responsibly.

1.2 Bullying, harassment, discrimination, sexual misconduct and victimisation are referenced collectively throughout this Policy as 'inappropriate behaviour' and wherever this term is used, it refers to the definitions of these behaviours in section 5. The negative actions included in section 6 also illustrate the different ways in which inappropriate behaviour may be demonstrated within our community.

1.3 Allegations of inappropriate behaviour, whether by a College worker, employee, Fellow, a visitor, a student, a third party such as a supplier, a member of the public or prospective student, should always be taken seriously. Action should be taken to stop any inappropriate behaviour identified as quickly as possible, including the use of disciplinary processes where necessary and where such behaviour is found to have taken place.

1.4 Bullying, harassment (including sexual harassment), discrimination, and victimisation may lead to disciplinary action up to and including dismissal if they are committed:

- in a work/College situation
- during any situation related to work/College such as at a social event with colleagues
- against a colleague or other person connected to the College outside of a work/College situation including on social media, or
- against anyone outside of a work/College situation where the incident is relevant to their suitability to carry out the role.

1.5 College staff (both employees and workers) and Fellows should be able to informally disclose or formally report incidents without fear of repercussions and trust the processes that are in place to address their concerns. The

College will not tolerate the victimisation of an individual for raising concerns in good faith or supporting someone to raise such concerns.

1.6 Nothing in this Policy should be interpreted as undermining or compromising the College's commitment to freedom of thought and expression, as stated in the University's Code of Practice on Freedom of Speech, which has been adopted by the College in full. Maintaining a culture of courtesy and professionalism at the College must not close off debate and topics that some may find disagreeable, distasteful or even offensive, and we are expected to be tolerant of the views and opinions of others in line with the principles of the University's Code of Practice on Freedom of Speech.

2. PURPOSE OF THIS POLICY

2.1 This Policy aims to prevent inappropriate behaviour in the workplace and resolve incidents of such behaviour if they occur. In support of this aim, this Policy:

- Sets out the standards of behaviours expected from College employees, workers and Fellows to ensure a common understanding of how everyone should behave towards one another.
- Ensures that staff are able to disclose inappropriate behaviour if it does occur and are supported in the process of resolving it.
- Promotes the early resolution of inappropriate behaviour wherever possible and appropriate, to prevent the psychological, health and work-related problems such behaviour can cause.
- Refers to what actions can be taken through the informal and formal resolution processes set out in the College's grievance and disciplinary policies if this Policy's principles are not observed.

2.2 This Policy supports the College in its duty to provide a safe environment in which to work under the Health and Safety at Work Act. Experiencing inappropriate behaviour often impacts an individual's physical and mental health and can also affect those who witness it.

2.3 This Policy is not contractual and may be amended from time to time, as necessary, in light of any changes in legislation or operational requirements.

3. WHO IS THIS POLICY FOR?

3.1 This policy applies to all College employees and workers, and Fellows.

3.2 Academic visitors, volunteers, suppliers, contractors and others will be expected to behave in a manner that is consistent with the Code of Behaviour set out in section 6 of this Policy when engaging in activities related to the College and/or on College premises.

3.3 This policy refers to Grievance and Disciplinary Policies. Staff can find the policies relevant to them on Cascade and the Intranet. Fellows should refer to the Fellows Handbook, Statute I, its Ordinance, and the associated Code of Practice for details of the applicable grievance and disciplinary policies. Statute I is disapplied in the contracts for some College Officers and separate Grievance and Disciplinary procedures apply for these individuals. These policies are on the Intranet.

3.4 This Policy does not apply to students. Standards of behaviour expected from students are set in the Student Handbook.

However, for clarity:

- The process a College employee, worker or Fellow should follow to raise a complaint against a student is outlined in section 12. Should disciplinary action need to be taken against a student in response to a complaint, this will be led by the College Dean.
- Should a student wish to make a complaint about 'inappropriate behaviour' by a College employee, worker, volunteer, or Fellow, they should raise the complaint with their Tutor first and foremost. A submitted complaint would be considered under the College Policy for Suggestions and Complaints.
- Should a student wish to make a complaint about 'inappropriate behaviour' by a third party (e.g. alumni, customers, clients, suppliers, contractors, and members of the public), the response and procedure outlined in the accompanying Dignity at Work Statement and Protocol will be followed, as required.

4. ROLES AND RESPONSIBILITIES

4.1 All employees, workers and Fellows have a responsibility to act in line with the College's Code of Behaviour set out in section 6 of this Policy. All employees, workers and Fellows also have a responsibility for completing any relevant mandatory training courses agreed by the College.

4.2 All members of the College community are expected to behave professionally and have the right to expect professional behaviour from others.

4.3 All those responsible for leading, managing and supervising people are in a position of trust and have additional responsibilities in the application of the Code of Behaviour in their area, which include:

- Setting a positive personal model of behaviour.
- Ensuring standards in the Code are established, communicated and understood and that regular visitors to their area have access to the Code.
- Taking appropriate action at the earliest opportunity to manage non-compliance with the Code, and to encourage a culture of early conflict resolution.
- Ensuring their staff are aware of and able to undertake any relevant mandatory training courses.
- Ensuring their staff are aware of and know how to report inappropriate behaviour through the relevant policies and procedures.

4.4 All roles involved in providing direct guidance and supporting informal or formal resolution processes are responsible for ensuring that information is handled confidentially.

4.5 Individuals who are notified of incidents of sexual harassment towards employees, workers, volunteers and Fellows of the College should report the details to the College's HR department who maintains a centralised, confidential records of both formal and informal sexual harassment complaints so that themes and trends can be identified. The HR department, in conjunction with the Bursar, Director of College Services or other College Officer, will determine if further investigations are required.

5. WHAT CONSTITUTES INAPPROPRIATE BEHAVIOUR?

5.1 All College employees, workers and Fellows are expected to behave professionally and appropriately and have the right to expect professional and appropriate behaviour from others. Inappropriate behaviour for the purposes of this Policy means bullying, harassment, discrimination, sexual misconduct and victimisation.

5.2 When deciding the appropriateness of behaviour, factors that will be taken into consideration include the specific context, the motive or intent of the individual demonstrating the behaviour, the impact on the individual and whether that impact or effect is reasonable in the circumstances and standards set out in the Code of Behaviour. The University's Code of Practice

on Freedom of Speech, adopted by the College, protects the right to express or describe views within the law that others may find offensive. This will be taken into consideration as part of the specific context or circumstances where relevant.

5.3 Inappropriate behaviour may:

- Be perpetrated by an individual or a group.
- Be intentional or unintentional.
- Take place either on or off College property, via College IT systems, or online via email, the internet or social media.
- Range from overt and easy to recognise one-off instances, to numerous, small remarks and acts sending denigrating messages to the recipient, linked to an individual's characteristics or status.

5.4 Although the terms are often used interchangeably, the terms 'bullying' and 'harassment' describe different types of behaviour. ACAS defines bullying as unwanted behaviour from a person or group that is offensive, intimidating, malicious or insulting to the recipient. It may involve an abuse or misuse of power that makes a person feel undermined or humiliated or causes physical or emotional harm. Power does not always mean being in a position of authority but can include personal strength, status, and the power to coerce through fear or intimidation. As such, it can be perpetuated upwards to a manager or senior colleague. Bullying can take the form of physical, verbal, and non-verbal conduct. Such behaviour is considered unacceptable in the workplace by the Health and Safety Executive.

Examples of bullying could include:

- Spreading a false rumour about a colleague.
- Consistently giving heavier workloads to one particular individual in a team.
- Unjustly cutting off or preventing a colleague from reasonably expressing their views in a meeting.
- Regularly undermining the authority of a more senior colleague.

5.5 Unlawful harassment under the Equality Act 2010 is unwanted conduct that is either related to the protected characteristics set out in section 5.5.1 or is conduct of a sexual nature as set out in section 5.5.2. The Act defines harassment as unwanted conduct that must have either the purpose or the

effect (where it is reasonable to have that effect) of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment can be physical, verbal or non-verbal. It can be a single incident, or repeated behaviour can include imagery, graffiti, gestures, mimicry, jokes, pranks and physical behaviour that affects the recipient. It can also include treating someone less favourably because they have previously submitted or refused to submit to unwanted conduct of a sexual nature or to unwanted conduct that is related to sex or gender reassignment.

5.5.1 When harassment relates to protected characteristics, it refers to the following characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

Examples of harassment relating to protected characteristics include:

- Using derogatory terms in connection with a team member's race or age.
- Belittling a colleague because of their disability.
- Disclosing a colleague's transgender status without their permission.
- Creating a hostile environment for a team member because they hold a protected philosophical belief.

5.5.2 Sexual harassment is a form of sexual misconduct, an umbrella term that describes all types of unwanted and unpermitted behaviour of a sexual nature including sexual abuse. The intention or reasonably perceived effect of this type of harassment is to violate the recipient's dignity or create an environment that is intimidating, hostile, degrading, humiliating or offensive for the recipient. It can happen to and be demonstrated by women, men and people of any gender or sexual orientation.

Sexual harassment includes serious sexual misconduct such as sexual assault or rape. Other examples of sexual harassment and misconduct could include:

- Emailing, texting, or messaging sexual content or making sexually offensive jokes to your team.
- Displaying sexually graphic pictures, posters or photographs.
- Unwanted flirting or making sexual remarks about a colleague's body, clothing or appearance.

- Suggestive looks, staring or leering.
- Touching a colleague or student without their permission, such as hugging them.
- Propositions and sexual advances.

5.5.3 Under the Equality Act 2010 the College has a positive legal duty to take reasonable steps to prevent sexual harassment of its workers. This is called the preventative duty. The preventative duty is anticipatory and designed to improve workplace cultures by requiring employers to anticipate how sexual harassment might happen in their workplace and take proactive, reasonable steps to prevent it happening. The College as an employer, and therefore its line managers/Heads of Departments, should not wait until a complaint of sexual harassment has been raised before taking any action. If sexual harassment does take place, the preventative duty means that the College should take action to stop sexual harassment from happening again. The College has undertaken an assessment of risks relating to harassment, sexual harassment and victimisation to identify potential risks and control measures to minimise the risks; this risk assessment will be kept in regular review.

5.6 Unlawful discrimination under the Equality Act 2010 is when the recipient is treated unfairly because of any of the following characteristics: age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation. Discrimination can be direct (when someone is treated less favourably than another person in the same situation – but without the protected characteristic – is or would be treated) or indirect (where rules or arrangements apply to a group of employees or job applicants, but in practice are less fair to a certain protected characteristic).

Examples of discrimination could include:

- Not offering a job to an individual because of their sex.
- Excluding a colleague from team social events because they are close friends with a LGBTQIA+ person.
- Drawing inferences about a job applicant's religion because of their name and rejecting that individual for that reason.
- Advertising a role and specifying a minimum number of years' experience.

5.7 Exposure to research, course material, academic debate and discussion, or speakers' views that may be experienced as offensive, contentious or

unacceptable but are nonetheless within the law, are unlikely to be considered unlawful harassment as defined in section 5.5, unlawful discrimination as defined in section 5.6, or bullying as defined in section 5.4, unless they are specifically intended to violate a person's dignity or to create an intimidating, hostile, degrading, humiliating, insulting, malicious or offensive environment for them.

5.8 Unlawful victimisation under the Equality Act 2010 occurs when a person is subject to a detriment because they made a complaint of unlawful discrimination or provided evidence or information in connection with a complaint of unlawful discrimination or because someone believes that they have done so or may do so.

6. CODE OF BEHAVIOUR

6.1 In an environment that encourages and celebrates freedom of thought and expression, it is vital that our behaviour towards one another remains courteous and professional. The following Code sets out the College's expectations around how we should and should not behave towards other members of our community. This Code is not exhaustive but models both the positive behaviour expected of us in our interactions with one another and the negative behaviours that may lead to informal or formal action being taken. However, no individual will be subjected to disciplinary sanction or other less favourable treatment by or on behalf of the College because of the lawful exercise of freedom of speech or academic freedom.

The negative actions listed in the Code below show how the inappropriate behaviour defined in section 5 may be demonstrated within our community. Understanding this can help each of us appreciate the impact of the way we behave.

The Code of Behaviour

We are each individually responsible for our own actions and for recognising the impact of our behaviour on others. Acknowledging the University and College's core values of freedom of thought and expression and freedom from discrimination, we should always strive to:

- Foster a trusting environment that enables honest and supportive working and studying conditions.
- Recognise that our actions can impact others and show courtesy and consideration in our interactions with others, even if we disagree with their views.

- Discuss views that others may find disagreeable or distasteful in a constructive and lawful way, in line with the University Code of Practice on Freedom of Speech, as adopted by the College.
- Treat each other fairly and without bias.
- Recognise and acknowledge the contribution of others to our work.
- Honour the need for confidentiality when the nature of our work requires it.
- Maintain appropriate and professional relationships with all members of the College, in particular students and those in junior positions to us.
- Promote a culture where colleagues can speak out about inappropriate behaviour.
- Support our colleagues experiencing inappropriate behaviour by intervening, speaking out and helping where we feel able.

In order to maintain a culture of courtesy and professionalism, we must never bully, harass, discriminate, victimise or commit sexual misconduct, by avoiding such behaviour as:

- Talking down to, belittling, gratuitously interrupting or preventing others from speaking.
- Directing inappropriate language, such as swearing, towards others or making degrading comments about individuals or groups of individuals.
- Making inappropriate derogatory remarks about a colleague's performance in public, whether directly (such as in a meeting) or indirectly (e.g., by needlessly copying people into an email).
- Humiliating others by shouting at them, either publicly or privately.
- Maliciously ignoring individuals or groups of individuals or inhibiting the ability of others to perform their roles by withholding information or excluding them from necessary meetings and discussion.
- Imposing overbearing and intimidating levels of supervision or management.
- Undermining the reputation of others through malicious rumours or false allegations or by breaching confidential conversations.

- Making racist, sexist, homophobic, transphobic or ageist jokes, remarks or gestures, which may demean or discriminate independently of our intentions.
- Mocking, mimicking or belittling a colleague, student or visitor because we perceive them as different to us, or using this difference as a reason to treat them unfairly.
- Behaving in a controlling or coercive way.
- Circulating or displaying any type of communication of any form of media that would otherwise constitute a form of inappropriate behaviour contrary to this Policy.
- Making unwelcome and unpermitted sexual advances, suggestive behaviour or touching someone against their will or without their consent, even if it is perceived as harmless by the individual behaving this way.
- Retaliating to allegations of inappropriate behaviour, including threatening those who have made the allegations, providing unfair or misleading references, or blocking access to career development opportunities.

7. WHAT TO DO WHEN YOU HAVE EXPERIENCED INAPPROPRIATE BEHAVIOUR

7.1 Allegations should always be taken seriously, and action taken as quickly as possible to stop any inappropriate behaviour identified. This section summarises the procedures available in the College's grievance and disciplinary policies to do this.

7.2 Both informal and formal options are available in the College's grievance and disciplinary policies 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.
- Mediation and facilitated conversations.

This type of collaborative approach has been found to be the most effective way of resolving conflict, tackling inappropriate behaviour and minimising any negative impact on the individuals involved.

Formal grievances are more appropriate for serious instances or repeated patterns of inappropriate behaviour where previous informal attempts may have failed.

To explore the appropriate option to use, individuals should speak with their line manager/Head of Department, the Master (applicable to Fellows), or with the HR Department. The colleague approached may need to discuss the matter and collect further information about the alleged inappropriate behaviour disclosed to provide appropriate guidance. This may involve speaking informally and confidentially with other individuals involved in or witnessing the incident. Any such activity will be undertaken promptly for the purposes of identifying the most appropriate option to resolve the alleged behaviour and will not constitute a formal investigation. This will only be undertaken with the permission of the individual disclosing the incident.

7.3 Individuals are encouraged to keep a record of the nature and frequency of the alleged inappropriate behaviour. This is to support them in raising their concerns and help the other party understand better the issues raised during the course of these discussions and the impact they have had.

7.4 Informal Resolution

7.4.1 An individual wishing to resolve issues informally should use the informal procedure set out in the Grievance Policy relevant to them. There is the direct resolution process, and the supported informal resolution process set out in the Policy.

7.4.2 The direct informal resolution process is where the individual experiencing the behaviour directly addresses the issue themselves. It is likely to be most effective when done in the early stages of experiencing the behaviour and in a constructive way, including specific examples of the unwanted behaviour, explaining why this made the individual feel uncomfortable or gave distress, and what the individual feels would resolve the issue.

7.4.3 Support to help the individual prepare what they want to say is also available from their line manager/Head of Department and/or from the HR Department.

7.4.4 The individual raising the concerns may wish to try informal resolution but, understandably, feel unable or reluctant to directly approach the other

party on their own. In an informal resolution process with support, the individual may ask for support to achieve any informal resolution.

This approach can particularly help when addressing issues concerning a line manager/Head of Department or a more senior colleague and help can be requested from:

- Their line manager/Head of Department (or equivalent).
- The HR Department.
- The Bursar.
- The Senior Tutor.
- The Master.

As part of this process, the supporting person can meet directly with the individual reported to have demonstrated the inappropriate behaviour to discuss what has happened and how to resolve it, or they can be part of any meeting between both parties.

7.5 Mediation and Facilitated Conversations

7.5.1 It may be appropriate for the matter to be dealt with by way of mediation, depending on the nature of the issue. Mediation is a well-established, confidential process for resolving issues between individuals, involving an impartial mediator(s) helping those involved find and agree their own solutions.

7.5.2 Mediation can be used at any time as a means of informal resolution, including before or after an informal or formal process.

7.5.3 Mediation is voluntary, confidential and either party can withdraw from the process at any time. No member of staff is required to use mediation before utilising the option of a formal grievance.

7.6 Formal Resolution

7.6.1 There will be instances of inappropriate behaviour where an informal resolution process is not successful or is simply not appropriate due to the nature of the allegations. In these situations, the individual experiencing the inappropriate behaviour should raise a complaint using the formal process set out in the Grievance Policy relevant to them.

7.6.2 No member of staff is required to use the informal route before utilising the option of a formal grievance.

7.6.3 Where the member of staff wishing to raise a formal complaint is under the age of 18 or is deemed to be an 'adult at risk' consideration should be given to the Safeguarding Policy.

7.6.4 When a complaint of bullying and/or harassment is received, it may be appropriate to separate the alleged harasser from the complainant. This may involve temporary transfer of the alleged harasser to another department, or the suspension of the alleged harasser with pay until the complainant has been investigated and resolved.

7.6.5 In circumstances where disciplinary action is taken in response to a complaint or behaviour, aggravating factors, such as abuse of power over a more junior colleagues, will be taken into account when deciding an appropriate disciplinary sanction.

7.7 Raising Alleged Inappropriate Behaviour Without Making a Complaint

7.7.1 It is the aim of this Policy to ensure all staff feel able to disclose alleged inappropriate behaviour so that it can be resolved. If an individual raises alleged inappropriate behaviour but does not want or feel able to proceed with either an informal resolution or a formal process, the colleague approached will:

- Discuss ideas for how the individual can respond to the behaviour if it happens again.
- Encourage the individual to talk to them again after any future repetition of the behaviour.
- Make the individual aware that they may have to take action if the nature of what is disclosed invokes the College's duty of care, particularly if the reported behaviour is impacting the individual's mental or physical wellbeing.
- Provide information on College support services.
- Check that the individual is aware of the informal and formal options available to resolve the alleged behaviour should they wish to reconsider at any point.

7.7.2 Should there be multiple informal disclosures that give rise to sufficient cause for concern, or the nature of what is disclosed invokes the College's duty

of care, the Head of Department/Line Manager may choose to conduct an investigation into the alleged behaviour.

7.8 Raising Complaints of Serious Sexual Misconduct

7.8.1 If an individual has experienced serious sexual violence, such as sexual assault, violence or rape, it is important they feel supported. They also have a choice in what they do next and what is right for them. The University has dedicated information about the reporting options and support available – both within and outside of the University – on its [Breaking the Silence](#) – website.

7.8.2 Often a grievance process will not be appropriate in response to a complaint of serious sexual misconduct. When an individual has 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 grievance policy. In serious cases, it may be necessary to refer the case to the Police.

7.8.3 Information is also available on the Breaking the Silence website for anyone who is approached for advice and support by an individual who experienced serious sexual misconduct. 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.

8. WHAT TO DO WHEN YOU ARE THE SUBJECT OF CONCERNS BEING RAISED

8.1 It can be a disconcerting and upsetting experience for an individual to be approached and told that their behaviour could be construed as inappropriate. If this is done through an informal process, they should be prepared to listen patiently and calmly and allow the members of staff (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. The individual should keep a note of what was discussed and, if appropriate, agreed.

8.2 The individual 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.

9. WHAT HAPPENS IF YOU HAVE BEHAVED INAPPROPRIATELY

9.1 While this Policy emphasises the value of an early, informal process, there will be situations that can only be resolved through a formal grievance. Where a formal grievance is brought and upheld against an individual and the nature of the inappropriate behaviour warrants it, a separate procedure under the relevant disciplinary policy will be undertaken by the College. This may result in a formal warning being issued to the person demonstrating the inappropriate behaviour and training or other interventions may also be recommended. In the cases of serious or sustained misconduct, the procedure may result in the termination of employment.

9.2 Additionally, where a Head of Department/Line Manager has become aware of multiple concerns or complaints of inappropriate behaviour in their area, which may not have been formally reported but give rise to sufficient cause for concern, they may choose to conduct an investigation to understand the alleged behaviours in more detail and to determine if support and interventions are needed. Known as a College-instigated investigation, this is intended to ensure the effective resolution of concerns raised and the prevention of future inappropriate behaviours where identified by the investigation. The purpose of the investigations is to ascertain the key concerns and possible solutions. If the findings indicate, this may lead to a disciplinary process under the relevant procedure.

9.3 In line with the University Code of Practice on Freedom of Speech, adopted by the College, no individual will be subjected to disciplinary sanction or other less favourable treatment by or on behalf of the lawful exercise of speech of academic freedom.

10. HOW WE WILL SUPPORT YOU

10.1 Support Services

10.1.1 The College is committed to providing support for employees, workers and Fellows affected by these issues. The following support resources are available to individuals whether they are considering raising an issue about inappropriate behaviour, actually disclosing an incident or the subject of a complaint.

10.1.2 Help for any employee or worker who has been subjected to sexual misconduct, including sexual assault or rape, is available through the University's Breaking the Silence website. This includes the details of services provided by both the University and external specialist organisations that support women, men and people of any gender or sexual orientation affected

by sexual misconduct.

10.1.3 The College offers members of staff access to confidential counselling/an employee assistance programme via Health Shield, which is available on request for anyone affected by, or accused of, inappropriate behaviour. The helpline number is 0800 028 1963.

10.1.4 The College has an arrangement with the University of Cambridge's Staff Counselling Centre. They can offer one-to-one counselling and support. For more information, please speak to the HR Department who can arrange a referral.

10.1.5 Members of staff who have been affected by sexual harassment or bullying (including sexual harassment unrelated to their employment) may also contact the following organisations for support:

The Equality Advisory and Support Service (for free advice or guidance on equality, discrimination or human rights issues:

www.equalityadvisoryservice.com

Protect: www.protect-advice.org.uk

Victim support: www.victimsupport.org.uk

10.2 Confidentiality

10.2.1 Confidentiality – and trust in that confidentiality – is critical when dealing with allegations of inappropriate behaviour. 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 under the relevant disciplinary procedure.

10.2.2 Information about a complaint by or about an individual may be placed on their personnel file, along with a record of the outcome and any other notes or other documents compiled during the process. Notes and records will be treated as confidential and be kept no longer than necessary in accordance with the data protection principles set out in the relevant data protection legislation.

10.3 Victimisation

10.3.1 The College will not tolerate any form of victimisation against an individual who has raised or supported an informal complaint, cooperated 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 an individual's career progression, such as deliberately providing unbalanced or overly negative references or blocking opportunities for that individual to participate in training and other development activities.

10.3.2 If a formal complaint of victimisation is made about a member of staff's behaviour it will be fully investigated and, if upheld, will be dealt with in accordance with the relevant disciplinary procedures.

10.4 Malicious or Vexatious Complaints

10.4.1 A malicious complaint is one that is made with the intention to intimidate, to lower the reputation of, or otherwise injure or harm a colleague or manager, through knowingly providing false or misleading information or withholding information about an incident or issue.

10.4.2 A vexatious complaint is either one that is made with the sole or main intention to harass, annoy, or subdue somebody, or one that is unreasonable, without foundation, frivolous, repetitive, deliberately burdensome, or unwarranted.

10.4.3 If it is found that an individual has made a complaint that is malicious or vexatious, the College may instigate a disciplinary process against them. Disciplinary action will not be taken, however, where a grievance is mistaken or otherwise ill-founded but not malicious or vexatious.

10.4.4 Individuals will not be subjected to disciplinary action or to any other detriment simply because their complaint is not upheld. Individuals will only face disciplinary action if it is found both that the allegation is false and made in bad faith (that is, without an honest truth in its belief).

11. TRAINING AND DEVELOPMENT OPPORTUNITIES

11.1. It is everyday interactions that indicate courteous and professional environments, whether in informal social situations, agreeing and allocating work, managing change, supporting development, feedback opportunities, being an active bystander or negotiating difficult conversations. All these require skills, practice and ongoing review and are needed at all stages of employment, from recruitment through to end of contract.

11.2. The College provides a wide range of training and development opportunities for staff, managers and leaders to build skills to tackle and prevent bullying, harassment, discrimination and sexual misconduct.

11.3. In meeting its public sector equality duty, the College will also identify any mandatory courses that need to be undertaken by staff and managers when they join the College (and on a periodic basis thereafter), or when preparing to undertake certain activities on behalf of the College (such as recruitment). The content of such courses will be focused on building awareness of the employment legislation, statutory codes, case law, and other relevant information to achieve the objectives of this duty, namely eliminating conduct prohibited by or under the Equality Act 2010, advancing equality of opportunity and fostering good relations between those who share a relevant protected characteristic and those who do not share it.

11.4. Any courses deemed to be mandatory will be communicated accordingly.

12. HOW TO RAISE COMPLAINTS NOT DIRECTLY COVERED BY THIS POLICY

12.1 College employees, workers or Fellows who have a complaint against a student should report the student to the Senior Tutor and/or the Dean. A Head of Department may report a student on behalf of a staff member if appropriate.

12.2 College employees, workers or Fellows who have a complaint against any other third party (such as a contractor) or a member of the public should speak with their Head of Department/Line Manager in the first instance. In order to address the complaint, it may be necessary to notify third parties and use their local complaints procedure and/or notify the Police when complaints involve members of the public. It may be appropriate to make the third party or member of the public aware of our Zero Tolerance Approach outlined in the Dignity at Work Statement and Protocol.

13. THIRD PARTY HARASSMENT

13.1 The law requires employers to take reasonable steps to prevent sexual harassment by third parties. Third parties include but are not limited to alumni, customers, clients, suppliers, contractors, and members of the public. While an individual cannot bring a claim for third-party harassment alone, it can still result in legal liability when raised in other types of claim.

13.2 Sexual harassment by third parties will not be tolerated and College employees, workers and Fellows are strongly encouraged to report any incidences that arise.

13.3 A risk assessment has been undertaken to assess the risks of third-party sexual harassment. It details the steps taken by the College to prevent it including warning a third party about their behaviour, banning a third party

from entering the College site or engaging in future business with the College, and reporting any criminal acts to the police.

13.4 The accompanying Dignity at Work Statement and Protocol outlines the College's protocol to protect members of staff and Fellows in the event of abusive or intimidating communication and/or behaviour by third parties.

| Date | Summary of Changes | Date of next review |
|----------------|---|----------------------------|
| November 2023 | New policy. | November 2024 |
| May 2024 | Rebranding applied | November 2024 |
| May 2025 | Updated in line with the introduction of the University's Code of Practice on Freedom of Speech; updated in line with the revisions to the University's Dignity at Work Policy; updated in response to new duties under the Equality Act 2010 regarding sexual harassment | May 2026 |
| September 2025 | Updated to reference policy/procedure for student complaints | September 2026 |
| November 2025 | Section 3.3 updated now that the Disciplinary and Grievance Policies has been approved for College Officers not covered by Statute I | November 2026 |