UKMC Anti Bullying and Harassment Policy

Date	Author	Summary of Changes	Version	Authorised
19/5/2025	Head of HR	Updates to Policy	1.1	Academic Board 19/5/2025

Policy/Procedure Owner	The policy is overseen by the Head of HR. Day-to-day implementation and communication responsibilities are delegated to investigate officers when matters arise.
Equality Analysis	EDI Committee TBD
Authorised By	Academic Board
Effective From	May 2025 (Academic Board)
Next Review	July 2026
Version	1 .1
Internal/External	Both
Document Location	UKMC | Policies and Legislation Staff portal
Linked Documents and Policies Internal	UKMC Equity, Diversity and Inclusion Policy UKMC Sexual Misconduct Policy E6 Report and Support Webpage accessible via UKMC | Policies and Legislation UKMC Vulnerable Student Support Policy UKMC Support to Study Policy and Procedure UKMC Safeguarding Policy UKMC Data Protection and Data Security Policy
Linked Documents and Policies External	Disciplinary & Grievance Procedure Equal Opportunities Policy Employment Act 2008 Equality Act 2010 Employment Act 2002 (Dispute Resolution) Regs 2004 ACAS Code of Practice 2015
Dissemination Plan	The policy will be distributed via communication bulletins, and annual trainings, refreshers, or meetings events. The policy will also be published on appropriate webpages on the website or intranet.
Accessibility	**Alternative formats available on request**

Supporting Statement

This document should be read in conjunction with the following statements:

Equality and Human Rights

UK Management College recognises that some sections of society experience prejudice and discrimination. The Equality Act 2010 specifically recognises the *protected characteristics* of age, disability, sex, race, religion and belief (or lack thereof), sexual orientation, gender reassignment, pregnancy and maternity and marital and civil partnership status. The Equality Act also requires regard to socio-economic factors.

The college is committed to promoting and advancing equality and removing and reducing discrimination and harassment and fostering good relations between people that hold a protected characteristic and those that do not both in the provision of services and in our role as a major employer. The college believes that all people have the right to be treated with dignity and respect and is committed to the elimination of unfair and unlawful discriminatory practices.

UK Management College also is aware of its legal duties under the Human Rights Act 1998. Section 6 of the Human Rights Act requires all public authorities to uphold and promote Human Rights in everything they do. It is unlawful for a public authority to perform any act which contravenes the Human Rights Act.

UK Management College is committed to carrying out its functions and service delivery in line with a Human Rights based approach and the FREDA principles of **F**airness, **R**espect, **E**quality **D**ignity, and **A**utonomy

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Purpose and Rationale

All members of staff are entitled to be treated with dignity and respect in their place of work. This means freedom from behaviour by colleagues that can be interpreted as bullying or harassment or that causes offense and access to redress if such behaviour does arise. It also means standards of everyday behaviour that contribute to a working environment in which mutual respect and individual dignity are maintained.

Personal harassment takes many forms but whatever form it takes; it is unlawful under the Equality Act 2010 and will not be tolerated.

For information on our zero-tolerance approach to sexual harassment in the workplace, including what behaviour can amount to sexual harassment, third-party sexual harassment and what to do if you witness or are subjected to sexual harassment, you should read our separate Sexual Harassment Policy.

This policy covers all areas of the UK Management College and includes overseas sites, subject to any applicable local laws which impose any additional requirements.

We recognise that we have a duty to implement this policy, and all employees are expected to comply with it. We will also endeavour to review this policy at regular intervals to monitor its effectiveness.

Outcome Focused Aims and Objectives

The Anti-Bullying & Harassment Policy is aimed at securing constructive and lasting solutions to workplace issues, conflicts, complaints or dealing with behaviours which may constitute bullying, harassment, discrimination and victimisation.

It is suitable for the following types of issue:

- Issues between colleagues
- Issues within or between teams
- Issues between managers and members of their teams
- Concerns or complaints about the allocation or distribution of resources
- Concerns or complaints about the actions or inactions of the organisation
- Behaviours which may be inappropriate and ultimately constitute bullying, harassment and victimisation

The main systems for resolutions available through the policy include, but not limited to:

- Resolution meetings between managers and colleagues
- Informal discussion within department
- Facilitated conversation with suitably trained facilitator
- Mediation

- Coaching
- Investigation to establish the facts if necessary
- Formal resolution meeting
- Appeals (only applicable for Resolution)

Scope

This policy applies to all colleagues including employees, governors, executive board members, contractors and volunteers and anyone else engaged to carry out duties within the organisation's premises on behalf of the organisation will be covered.

The policy covers any behaviours which result in people feeling that they are not being treated with respect and civility including bullying and harassment in the organisation and in any work-related setting outside the workplace, e.g., business trips and social events. Each colleague carries personal responsibility for their own behaviours in relation to this policy.

Any issue raised should be treated in a fair and consistent way and dealt with quickly and supportively. This approach can be used for individuals and groups when there is a collective complaint.

All complaints must be raised within 3 months of the incident/concern unless there are exceptional circumstances preventing this (e.g. an ongoing issue relating to respect and civility).

Definitions

Harassment

Personal harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Personal harassment is unwanted behaviour by one employee towards another that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Examples of harassment include:

- insensitive jokes and pranks
- spoken words
- written words
- lewd or abusive comments
- graffiti
- physical gestures
- facial expressions
- mimicry
- acts affecting a person's surroundings

- aggression
- physical behaviour towards a person or their property
- deliberate exclusion from conversations
- displaying abusive or offensive writing or material
- abusive, threatening or insulting words or behaviour
- name-calling
- picking on someone or setting them up to fail
- exclusion or victimisation
- undermining their contribution/position
- demanding a greater work output than is reasonably feasible
- blocking promotion or other development/advancement.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment.

Sexual harassment

Sexual harassment can take place in many forms within the workplace and can go undetected for a period of time where employees do not understand that behaviour is classed as sexual harassment. Sexual harassment is unwanted 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 for that person. It can include:

- sexual comments or jokes
- displaying sexually graphic pictures, posters or photos
- suggestive looks, staring or leering
- propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person’s private or sex life or a person discussing their own sex life
- sexual posts or contact on social media
- spreading sexual rumours about a person
- sending sexually explicit emails or text messages
- unwelcome touching, hugging, massaging or kissing.

Sexual harassment can also take place where an employee is treated less favourably because they have rejected, or submitted to, the unwanted conduct that is related to sex or is of a sexual nature. Whether less favourable treatment occurs as a result will be examined broadly and includes areas such as blocking promotion and refusal of training opportunities or other development opportunities.

A separate policy dealing specifically with sexual harassment is available. Please refer to that policy in relation to any complaints relating to sexual harassment.

Less Favourable Treatment For Rejecting Or Submitting To Unwanted Conduct

This occurs when:

a. someone is subjected to unwanted conduct:
   i. of a sexual nature
   ii. related to sex
   iii. related to gender reassignment

b. the unwanted conduct has the purpose or effect of:
   i. violating their dignity
   ii. creating an intimidating, hostile, degrading, humiliating or offensive environment for them
   iii. them being treated less favourably because they submitted to, or rejected, the unwanted conduct.

Detrimental Behaviour Because Of An Association With A Protected Characteristic

Bullying and harassment may not be based on the fact that a colleague belongs to a particular group, but simply because the individual has been singled out for such treatment or associates with someone with a protected characteristic. For example, this would include claiming someone is gay when they are not or making fun of someone who has a disabled relative. Bullying and harassment may take the following forms, though again this is not intended as an exhaustive list:

- limiting or withdrawing verbal communication
- isolating a colleague by unfriendly behaviour
- behaviour designed to belittle or produce anxiety in a colleague
- unreasonable scrutiny of work
- unreasonable criticism of work and adopting double standards in expectations of work performance
- unreasonable denial of leave and/or special leave requests
- unreasonable denial of requests for flexible working
- work or staff social activities that deliberately exclude a colleague
- jokes or inappropriate humour at the expense of a colleague.

Standards Of Work Behaviour

- Courtesy towards colleagues.
- Consideration and understanding of the work demands of colleagues.

- Maintaining a temperate tone, and temperate language, in all verbal and written communication with colleagues.
- Avoidance of the use of foul language.
- Awareness of language and conduct which have the potential to offend a colleague.
- Obtaining the express or implied permission of a colleague before adopting familiarity in conduct or language.

Circumstances Which Are Covered

This policy covers behaviour which occurs in the following situations:

- a work situation
- a situation occurring outside of the normal workplace or normal working hours which is related to work, eg a working lunch or social event with colleagues
- outside of a work situation but against a colleague or other person connected to the Organisation, including on social media
- against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role.

Third-Party Harassment

Third-party harassment occurs when one of our colleagues is subjected to harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes our customers, suppliers, members of the public, etc. Third-party harassment of our workforce will not be tolerated.

Should you be subjected to third-party harassment, you are encouraged to report this as soon as possible.

Should a student or external visitor harass a member of our colleagues, they will be warned that continued provision of our service to them will cease if they are to act in a similar way again. Should their behaviour recur, they will be informed that our service to them will cease. Any criminal acts will be reported to the police, and we will share information relating to the incident with our other branches to ensure that we maintain a consistent approach to the cessation of our services.

Examples Of Victimisation

Victimisation takes place when an employee is treated unfavourably as a direct result of raising a genuine complaint of discrimination or harassment. Furthermore, any employee who supports or assists another employee to raise a complaint is also subjected to victimisation if they are treated unfavourably.

Process For Complaining About Harassment And/Or Bullying

The Organisation is committed to ensuring that there is no harassment or bullying in the workplace. Allegations of harassment will be treated as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of the grievance and disciplinary procedures, a copy of which is available from the HR Team.

Informal Method

We recognise that complaints of personal harassment can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper.

If you are the victim of minor harassment, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand in a written request to the harasser and your confidential helper can assist you in this.

Formal Method

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of the HR Team as a formal written grievance and again, your confidential helper can assist you in this. If possible, you should keep notes of the harassment so that the written complaint can include:

- the name of the alleged harasser
- the nature of the alleged harassment
- the dates and times when the alleged harassment occurred
- the names of any witnesses
- any action already taken by you to stop the alleged harassment.

Where it is not possible to make a formal complaint to Human Resources Team, e.g. where they are the alleged harasser(s) we would encourage you to raise your complaint to the Provost, Professor Jason Powell.

On receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

On conclusion of the investigation, which will normally be within 5 working days of the meeting with you, a report of the findings will be submitted to the manager

who will hold the grievance meeting.

You will be invited to attend a meeting at a reasonable time and location to discuss the matter once the person hearing the grievance has had the opportunity to read the report. You have the right to be accompanied at such a meeting by a colleague, or a union representative, and you must take all reasonable steps to attend. Those involved in the investigation are expected to act in confidence and any breach of confidence will be a disciplinary matter.

You will be able to put your case forward at the meeting and the manager will explain the outcome of the investigation. You have a right to appeal the outcome, which is to be made within 5 days of receiving the outcome.

If the decision is that the allegation is well-founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure up to and including dismissal. When deciding on the level of disciplinary sanction to be applied, we will take into consideration aggravating factors such as abuse of power over a more junior colleague.

UKMC is committed to ensuring employees are not discouraged from using this procedure and no employee will be victimised for having brought a complaint. However, if it is concluded that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

Staff are reminded of the Organisation's whistleblowing policy, which is available upon request.

Duties

Chief Executive Officer

The Chief Executive Officer has delegated responsibility for ensuring compliance with legislation to the Head of Human Resources

Academic Board

The Board is responsible for ensuring that the policy is being adhered to both collectively and by the management and colleagues in their area of responsibility.

Head of Human Resources

The Head of Human Resources has a responsibility to ensure that robust systems are in place, to ensure compliance with the policy and employment legislation. They will also ensure that all Directors, Managers, Human Resources Team, and colleagues are fully aware of their roles and responsibilities in relation to the early resolution procedure.

Senior Management Team

It is the responsibility of the Senior Management Team to ensure that they follow the procedure. Senior Managers will also feature as part of the Appeal Hearing panel

Line Managers

Line managers will attempt to resolve workplace issues, conflicts and complaints raised by colleagues informally, fairly, consistently and within the agreed timescales.

All Colleagues

Colleagues are required to participate and co-operate with others in ways aimed at resolving workplace issues, conflicts and complaints and to state what would be seen as a suitable outcome. complaints. Colleagues should be advised of their right to be accompanied at all formal stages in the procedure by a trade union representative or workplace colleague.

Human Resources

The Human Resources Team will work with managers; trade unions and colleagues to ensure the policy is followed and complies with employment legislation. They will provide support and advice to managers, colleagues and trade union representatives. Human Resources are responsible for advising all parties on the handling and ways to ensure early resolution of colleague's workplace issues, conflicts and complaints and may be directly involved at any stage. They will also help to maintain consistent and uniform standards throughout the organisation.

Monitoring and Dissemination

The Human Resources Department will maintain data to enable the monitoring of the number of workplace issues, conflicts or complaints submitted. This information will be reviewed and reported to the Head of Human Resources on a regular basis.

Dissemination Of The Policy

This policy will be brought to the attention of all employees and will form part of the induction process for new staff.

This policy will be disseminated organisation wide for all employees to understand and be made aware of via awareness presentations, newsletters and emails.

It is important that staff understand and are aware of this policy.

Review Of The Policy

There will be a review of the policy on a three-yearly basis, or sooner if appropriate e.g., as a result of legislation changes requirements.

Policy updates will be reported to the Academic Board for consideration.