UKMC

Dignity at Work Policy

Date	Author	Summary of Changes	Version	Authorised
14 August 2026	HR	Fully supersedes and replaces the former "Anti Bullying and Harassment Policy V1.1". Rebranded to a unified "Dignity at Work" framework, consolidating core provisions for Bullying, Harassment, Sexual Harassment, Third-Party Harassment, and Victimisation. Explicitly aligned with the Academic Freedom and Freedom of Expression Code of Practice to ensure compliance with OfS Condition E6 provisions.	2	Q&S Chair Action Pending AB Approval

Policy/Procedure Management and Responsibilities	
Policy/Procedure Owner	The policy is overseen by the Head of HR. Day-to-day implementation and communication responsibilities are delegated to HR Team.
Equality Analysis	Q&C Team
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Next Review	December 2028
Internal/External	Staff internal only
Document Location	Internal
Linked Documents and Policies Internal	UKMC Policies and Legislation UKMC Academic Freedom of Speech and Expression Code of Practice Policy.docx
Linked Documents and Policies Internal	Staff Portal

Dissemination Plan	This policy is a HR departmental policy and will be disseminated through departmental training/
Accessibility	**Alternative formats available on request to** quality@ukmc.ac.uk

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Purpose

This policy operates in strict conjunction with the UKMC Academic Freedom and Freedom of Expression Code of Practice. Nothing within this policy will be interpreted or applied in a manner that restricts the statutory right of staff to hold or express lawful views, ideas, or academic opinions in accordance with Office for Students (OfS) Condition E6 regulatory requirements.

At UK Management College, we are committed to providing a safe, inclusive, respectful and professional working environment where all employees, workers, contractors, agency staff, volunteers and visitors are treated with dignity and respect.

The college will not tolerate bullying, harassment, sexual harassment, discrimination, victimisation, or any other behaviour that undermines an individual's dignity, wellbeing or ability to work effectively.



All concerns and complaints will be taken seriously, investigated promptly, and addressed fairly, consistently and, where appropriate, confidentially.

The College is committed to taking all reasonable steps to prevent sexual harassment and to providing a safe, respectful, and inclusive environment for all employees, workers, students, and visitors, regardless of sex, gender identity, gender reassignment status, sexual orientation, or any other protected characteristic.

This includes implementing proactive measures to identify, assess and mitigate risks, fostering a culture of respect, and ensuring compliance with legal obligations and best practice standards.

Scope

This policy applies to:

- Employees
- Workers
- Agency workers
- Contractors and consultants
- Apprentices
- Volunteers
- Job applicants
- Anyone acting on behalf of the college

Application

This policy applies to conduct occurring:

- In the workplace
- During business travel
- At training events
- At conferences and professional events
- At work-related social events
- During online meetings and virtual events
- Through electronic communications, including email, messaging platforms and social media where connected to work

- In any other work-related setting where individuals are representing or associated with the college

Definitions

Bullying:

Bullying is offensive, intimidating, malicious or insulting behaviour involving an abuse or misuse of power that has the purpose or effect of undermining, humiliating, degrading or injuring an individual.

Examples include:

- Persistent criticism
- Shouting or aggressive behaviour
- Excluding individuals from meetings or activities
- Spreading malicious rumours
- Setting unrealistic deadlines
- Public humiliation
- Excessive monitoring without justification



Bullying may occur as a single serious incident or a pattern of behaviour.

Harassment:

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- Violating a person's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment.

Protected characteristics include:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Examples include:

- Offensive jokes or comments
- Mocking someone's disability
- Racial slurs
- Displaying offensive material
- Deliberately using incorrect pronouns
- Excluding someone because of a protected characteristic

Sexual Harassment:

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.



Sexual harassment can be a single incident or a pattern of behaviour and may occur in person, in writing, online, by telephone, or through other forms of communication. A person does not need to have previously objected to the behaviour for it to be considered unwanted.

Examples of sexual harassment include, but are not limited to:

- Unwanted physical contact, including touching, hugging, kissing or brushing against another person
- Sexual comments, jokes, innuendo or remarks

- Suggestive, sexually explicit or offensive emails, messages or social media communications
- Intrusive or inappropriate questions about a person's private life, relationships or sexual orientation
- Repeated requests for dates, meetings or social contact after a refusal has been given
- Sharing, displaying or sending sexually explicit or inappropriate material
- Staring, leering or making gestures of a sexual nature
- Making comments about a person's appearance in a way that causes discomfort or offence
- Unwanted flirting or sexual advances
- Promising workplace benefits or threatening disadvantage in return for sexual favours

The impact of the behaviour on the recipient is a key consideration when determining whether sexual harassment has occurred. The intention of the person engaging in the behaviour is not the determining factor. What matters is whether the conduct was unwanted and whether it had the purpose or effect described above.

Third-Party Harassment

Third-party harassment refers to any harassment experienced by an employee, worker, contractor, volunteer, or other individual covered by this policy that is perpetrated by someone who is not employed by the College.

Third parties may include, but are not limited to:

- Students
- Customers
- Service users
- Visitors
- Contractors
- Suppliers
- Governors, trustees or external partners
- Members of the public



Third-party harassment can arise in connection with any protected characteristic recognised under equality legislation. It may also consist of unwanted conduct that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or

offensive environment. Such harassment may occur face to face, online, by telephone, in writing, or through other forms of communication.

Examples of third-party harassment include:

- Offensive, abusive or discriminatory comments
- Bullying, intimidation or threatening behaviour
- Unwanted conduct of a sexual nature
- Racist, sexist, homophobic, transphobic, ageist or disability-related remarks
- Unwelcome jokes, banter or gestures
- Offensive emails, messages or social media communications

The college will not tolerate third-party harassment and is committed to taking all reasonable steps to prevent and address such behaviour. Any concerns or incidents will be taken seriously and, where appropriate, action will be taken to protect those affected, including investigating complaints, challenging unacceptable behaviour, and implementing measures to reduce the risk of recurrence.

Responsibilities

Employees:

All employees must:

- Treat colleagues, students, visitors, contractors, and other stakeholders with dignity and respect.
- Comply with the requirements of this policy and related procedures.
- Challenge inappropriate behaviour where it is safe and appropriate to do so.
- Report incidents, concerns, or complaints of harassment promptly.
- Cooperate fully with any investigation into alleged harassment.

Managers:

Managers must:

- Lead by example and promote a respectful working environment.
- Take all concerns and complaints seriously and respond promptly.
- Seek advice from Human Resources where appropriate.
- Escalate concerns and complaints in accordance with the College's reporting and investigation procedures.
- Maintain confidentiality and handle concerns sensitively.

- Support employees who raise concerns or are affected by harassment.
- Take preventative action where risks of harassment are identified.

Human Resources:

Human Resources will:

- Provide advice, guidance, and support to managers and employees.
- Ensure complaints are managed fairly, consistently, and in accordance with college procedures.
- Support and oversee investigations where appropriate.
- Monitor trends, outcomes, and areas of potential risk.
- Review workplace practices and risks relating to harassment.
- Deliver and promote training and awareness initiatives.

The College:

The College is committed to providing a safe, inclusive, and respectful working environment and will:

- Take all reasonable steps to prevent harassment, including sexual harassment.
- Regularly assess and review workplace risks relating to harassment.
- Provide appropriate training and guidance to managers and employees.
- Maintain clear, accessible, and effective reporting procedures.
- Investigate complaints promptly, sensitively, and fairly.
- Take appropriate corrective or disciplinary action where necessary.
- Monitor the effectiveness of measures implemented to prevent harassment and improve workplace culture.

These measures support the College's duty to take reasonable steps to prevent harassment and its enhanced preventative duty in relation to workplace sexual harassment. The College will keep its arrangements under regular review to ensure they remain effective and compliant with legal requirements.

Escalation of Complaints:

Managers who receive a complaint, witness inappropriate behaviour, or become aware of a potential breach of this policy must take prompt action. Where informal resolution is not appropriate, the matter must be escalated to Human Resources without delay.

Managers should also escalate concerns where:

- The allegation is serious in nature.
- The complaint involves harassment, sexual harassment, discrimination, victimisation, or safeguarding concerns.
- The complainant requests a formal investigation.
- There is a risk to the health, safety, or wellbeing of any individual.
- The complaint involves a manager or other senior employee.
- Previous informal attempts to resolve the issue have been unsuccessful.



Human Resources will advise on the appropriate course of action and determine whether a formal investigation is required. Where necessary, matters may be referred to senior management, safeguarding leads, external agencies, or the police.

Reporting Concerns

Any employee who experiences, witnesses, or becomes aware of bullying, harassment, sexual harassment, or victimisation is encouraged to report their concerns as soon as possible.

Concerns may be raised through any of the following channels:

- The employee's line manager.
- Another manager where the line manager is involved in the concern or the employee does not feel comfortable reporting to them.
- Human Resources.
- The College's Speak Up (Whistleblowing) procedure.

Reports may be made verbally or in writing. Employees are encouraged to provide as much information as possible, including details of the incident(s), those involved, any witnesses, and any supporting evidence.



All concerns will be taken seriously and handled as sensitively, confidentially, and promptly as possible. Information will only be shared with those who need it to investigate and resolve the matter appropriately.

The College will consider appropriate interim measures to protect those involved while concerns are being reviewed or investigated.

- **No employee will suffer retaliation, victimisation, or any other detriment for raising a concern or participating in an investigation in good faith.**
- **Any act of retaliation or victimisation will be treated as a serious conduct matter!**

Where a concern relates to a criminal offence, safeguarding issue, or an immediate risk to health, safety, or wellbeing, the matter may be referred to the appropriate external authority, including the police, local authority, or other relevant agency.

Informal Resolution

Where appropriate and with the agreement of those involved, concerns may be resolved informally before a formal complaint is made. Informal resolution can often help address issues at an early stage and prevent them from escalating.

Informal options may include:

- Discussing the issue directly with the individual concerned and explaining that their behaviour is unwelcome and should stop.
- Seeking support from a manager to raise and address the issue informally.
- Requesting management intervention to facilitate a resolution.
- Participating in a facilitated conversation or mediation where appropriate and agreed by all parties.



Employees are not required to attempt informal resolution before making a formal complaint and should not do so if they feel uncomfortable or unsafe.

Informal resolution will not normally be appropriate where:

- The allegations are serious in nature.
- The behaviour may constitute sexual harassment, discrimination, victimisation, or a safeguarding concern.
- There is a significant imbalance of power between the individuals involved.

- Previous attempts at informal resolution have been unsuccessful.
- The matter may warrant formal disciplinary action.

Where informal action does not resolve the concern, or where the circumstances require it, the matter may be addressed through the formal procedure.

Formal Procedure

Where informal resolution is inappropriate, unsuccessful, or the nature of the allegation requires formal action, an employee may submit a formal complaint in accordance with the College's grievance or dignity at work procedures.

The formal process will normally involve the following steps:

1. A formal complaint is received and acknowledged.
2. An impartial investigating manager will be appointed.
3. The investigating manager will gather relevant evidence, which may include witness statements, documents, correspondence, and other relevant information.
4. Individuals involved will be given an opportunity to provide their account of events.
5. The evidence will be reviewed, and findings will be documented in a written investigation report.
6. A decision will be made regarding any further action required.
7. The parties will be informed of the outcome, subject to confidentiality and data protection requirements.

- **The College will aim to conduct investigations promptly and fairly. All parties are expected to cooperate fully with the investigation process and maintain appropriate confidentiality.**
- **Where appropriate, temporary measures will be implemented during an investigation to safeguard the wellbeing of those involved and maintain a respectful working environment.**

Possible Outcomes

Following an investigation, outcomes may include, but are not limited to:

- No further action where there is insufficient evidence to substantiate the complaint.
- Informal management guidance or recommendations.
- Additional training, coaching, or awareness-raising measures.
- Facilitated discussions or mediation, where appropriate.
- Review of working arrangements or workplace practices.
- Formal management action.
- Disciplinary action in accordance with the College's Disciplinary Policy, up to and including dismissal.
- Referral to an external agency where required by law or where safeguarding concerns arise.

Victimisation

The College will not tolerate victimisation of any individual who, in good faith:

- Raises a concern or complaint under this policy.
- Participates in or supports an investigation.
- Acts as a witness.
- Provides evidence or information relating to a complaint.
- Supports another individual in making or pursuing a complaint.
- Raises concerns about potential breaches of this policy.



Victimisation occurs when a person is treated unfavourably because they have made, supported, or participated in a complaint or allegation relating to bullying, harassment, discrimination, or sexual harassment.

Examples of victimisation may include:

- Excluding an individual from meetings, opportunities, or workplace activities.
- Unjustified criticism or negative treatment.
- Threats, intimidation, or hostile behaviour.
- Unfair changes to duties, working arrangements, or terms and conditions.
- Any other conduct that disadvantages a person because they have raised or supported a concern.

Any allegation of victimisation will be taken seriously and investigated promptly. Employees who engage in victimisation may be subject to disciplinary action, up to and including dismissal.

Confidentiality

The College will treat all complaints, concerns, and investigations under this policy sensitively and, wherever possible, confidentially.

Information relating to a complaint will only be shared with those who have a legitimate need to know in order to:

- Conduct a fair and thorough investigation.
- Consider and implement appropriate action.
- Comply with legal, regulatory, or safeguarding obligations.
- Protect the health, safety, and wellbeing of those involved.
- Provide appropriate support to the individuals concerned.



All employees involved in a complaint or investigation are expected to maintain confidentiality and not discuss the matter with others unless authorised to do so or required for support, representation, or legal purposes.

While the College will make every effort to preserve confidentiality, it cannot guarantee absolute confidentiality where disclosure is necessary to investigate a complaint, fulfil a legal obligation, protect an individual, or manage a significant risk.

Any unauthorised breach of confidentiality will be dealt with under the relevant College procedures and, where appropriate, may result in disciplinary action.

Breaches of the Policy

Any employee found to have engaged in bullying, harassment, sexual harassment, victimisation, or retaliation may be subject to disciplinary action, up to and including dismissal.

Where a third party (such as a customer, supplier, contractor, visitor, or service provider) engages in behaviour that breaches this policy, the organisation may take appropriate action, including:

- Issuing a formal warning
- Restricting or removing access to company premises, systems, or services
- Terminating contracts or business relationships
- Refusing future engagement with the individual or organisation
- Reporting incidents to relevant authorities, professional bodies, or regulatory agencies where appropriate

The college will investigate all reported concerns promptly and take appropriate action in line with its policies, procedures, and legal obligations.

Related Policies

This policy should be read in conjunction with the following policies and procedures:

- Disciplinary Policy
- Grievance Policy
- Equality, Diversity and Inclusion Policy
- Whistleblowing Policy
- Code of Conduct
- Dignity at Work Policy (where applicable)

These policies provide additional guidance on expected standards of behaviour, reporting concerns, investigating complaints, and addressing breaches of workplace standard.