Dignity at Work Policy

1 Introduction

1.1 The College is committed to maintaining a work environment free of any forms of unacceptable behaviour (bullying, harassment, unlawful discrimination or victimisation) where everyone is treated with dignity and respect.

1.2 Any form of unacceptable behaviour will not be tolerated. All allegations of unacceptable behaviour will be investigated, and if appropriate, disciplinary action will be taken. Victimisation of a person for making allegations of unacceptable behaviour in good faith or supporting someone to make such a complaint will also not be tolerated. It is a disciplinary offence.

1.3 Staff experiencing any form of unacceptable behaviour are encouraged to raise concerns and seek advice at the earliest opportunity, without fear of repercussion, in order for the situation to be resolved.

2 Scope

2.1 This policy relates to all employees of the College. It also applies to any other individuals who may not be directly employed by the College but work on campus, visitors to the campus and those who interact with our employees through the course of their work, including ex-students. All visitors to the College, including contractors and agency staff, are expected to abide by this policy and those responsible for their presence on campus are expected to take reasonable steps to ensure they do so.

2.2 This policy covers dignity in the workplace and in any work related setting outside the workplace, for example business trips and work-related social events. Workplace, for example business trips and work-related social events.

2.3 There is a separate Code of Practice on Personal Harassment for Students available at: http://www.rhul.ac.uk/ecampus/documents/pdf/codesandregulations/studentharassment.pdf

3 Principles

3.1 This policy aims to:

- set standards for expected conduct and behaviour for all those employed by the College to ensure dignity at work;
- give individuals the confidence to complain, informally or formally, in the knowledge that their complaints will be taken seriously and due process followed in resolving the matter.
4 Legislation

4.1 Under the Equality Act 2010, Royal Holloway has a legal obligation to ensure discrimination or harassment on the grounds of a Protected Characteristic does not take place. A “Protected Characteristic” includes age, disability, gender identity and expression, marital or civil partner status, pregnancy or maternity, race, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

5 Roles and Responsibilities

5.1 The Director of Human Resources is responsible for ensuring that this policy is implemented and monitored. The Council of the College is accountable for ensuring that the College complies with all legislative requirements.

5.2 All members of the College community are expected:

- to take personal responsibility for their own behaviour;
- to treat everyone with respect and dignity;
- not to discriminate themselves or incite others to behave in discriminatory ways;
- not to harass, abuse or intimidate others;
- not to victimise or attempt to victimise anyone who has made a complaint(s) of bullying or harassment or provided information on bullying or harassment; and
- to act as soon as they become aware of any instance of bullying or harassment.

5.3 The College is committed to developing a positive working environment through the provision and promotion of:

- a range of training for employees to provide a better understanding of dignity in the workplace and to raise awareness of the effects of unacceptable behaviour on individuals and on the working environment;
- a climate in which people feel able to raise complaints of unacceptable behaviour without fear of victimisation
- clear guidance on appropriate behaviour and conduct to support an inclusive culture;
- ensuring there are clear processes in place through which employees can communicate with senior management;
- appropriate mechanisms to address concerns about behaviour which may breach this policy

5.4 All managers have a duty of care to their staff and must take effective, sensitive and rapid action when incidents of unacceptable behaviour are brought to their attention. Managers have a duty to eliminate any unacceptable behaviour of which they are, or should be aware of. Failure to deal with a complaint of bullying or harassment can itself amount to misconduct.

5.5 Monitoring is an important way of finding out whether the measures taken by the College to prevent unacceptable behaviour and to promote inclusivity are effective. Information on the
prevalence and distribution of unacceptable behaviour will be collected by the Human Resources department via staff surveys, exit interviews and formal disciplinary and grievance cases. Anonymous statistical data will be collected and reported to the Equality, Diversity and Inclusion Committee. The recognised trade unions will also encourage staff to complete monitoring data to enable effective measures to be put in place.

6 Definitions

6.1 Unlawful discrimination takes place when an individual or a group of people is treated less favourably than others based on a protected characteristic such as age. Disability, gender reassignment or gender identity, marriage and civil partnership, pregnancy and maternity (including treating a woman less favourably because she is breastfeeding), race, religion, or belief, sex, sexual orientation and in relation to direct discrimination only.

6.2 Direct discrimination occurs where someone is treated less favourably because of one of the protected characteristics set above; this can include association with or perception of a particular characteristic

6.3 Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criteria or practice that puts people with a particular protected characteristic at a disadvantage compared with others who do not share that characteristic

6.4 Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

6.5 Harassment as defined in the Equality Act 2010 as: ‘Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the individual.

6.6 Bullying or harassment will constitute unlawful discrimination where it relates to one of the protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age.

6.7 Bullying and harassment may be misconduct that is physical, verbal or non-verbal e.g. by letter or email or through posting on social media, perpetrated either by a group or an individual.
6.8 The College recognises harassment as distinct from vigorous academic debate, which is characterised as being respectful, encouraging a variety of viewpoints and having the effect of stimulating and encouraging thought and discussion. Whilst staff and students will clearly hold a range of views on a variety issues, they would be expected to treat all members of the College community with dignity and respect and ensure that the expression of their views is not manifested in such a way that creates an environment that is intimidating, hostile, degrading, humiliating or offensive to others.

6.9 Sexual misconduct is a broad term used to encompass a range of behaviours including sexual harassment, non-consensual sexual contact (sexual assault), and non-consensual sexual penetration (rape). Further detailed definitions of sexual misconduct can be found in Appendix 1 - Expanded Definitions.

6.10 Sexual misconduct can occur between individuals who know each other, have an established relationship, have previously engaged in consensual sexual activity, and between individuals who do not know each other. Sexual misconduct can be committed by persons of any gender identity, and can occur between people of the same or different sex.

6.11 Employees are expected to carry out their jobs in line with the standards expected and in adherence with College policies. For managers this includes managing performance or absence, conducting grievance or disciplinary investigations and managing conflict as necessary. Discharging this role in line with these standards and policies does not constitute bullying or harassment.

6.12 Where, after investigation, it is found that a complaint was made with the intent to be malicious, that is to harm their/its reputation or standing without basis in fact, the complainant may be referred for disciplinary action.

6.13 Victimisation is less favourable treatment of someone who has complained or given information about discrimination, bullying or harassment, or supported someone else's complaint.

6.14 The College recognises that bullying and harassment can also take place through electronic communication (such as emails, text or WhatsApp messages) and social networking (such as Facebook and Twitter). All staff are expected to comply with the Social Media Policy: https://intranet.royalholloway.ac.uk/staff/assets/docs/pdf/royal-holloway-social-media-policy-for-staff-final.pdf. Indecent, threatening or offensive emails or phone calls may not only be bullying or harassment and therefore potentially a matter for disciplinary action. They may also breach the College’s Email Guidelines: www.royalholloway.ac.uk/it/tos/emailguidelines.aspx

6.15 A single incident can constitute bullying, harassment or sexual misconduct if sufficiently grave.

More detailed definitions are included in appendix 1
7 Procedures for Dealing with Unacceptable Behaviour

7.1 Complaints made by employees under this policy will be handled as grievances. These procedures are therefore designed to be consistent with the College's Grievance Policy and Procedures but are designed to be more practical and user-friendly. This document does not replace or alter the information or procedures set out in the College's Grievance Policy and Procedures.

7.2 The College is committed to protecting members of staff from unacceptable behaviour in the workplace and recognises that members of staff who feel they are subject to such behaviour may need additional support and advice in relation to raising concerns or grievances about these matters.

7.3 Challenging unacceptable behaviour can be difficult and distressing, and is not undertaken lightly. Any person raising a complaint or having a complaint made against them, or being involved as a witness or adviser, will be treated fairly and offered objective and non-judgemental advice and support as required.

7.4 It is important to note that the person who makes a complaint is usually the recipient of the behaviour complained of, but that may not always be the case. The complainant can also be someone who has direct or sufficient knowledge of the behaviour to enable a complaint to be raised. For example, if they have overheard racist or sexist language which, while not directed at them, caused them offence and distress.

7.5 Any concerns about bullying and harassment can and should be raised in line with this policy and the appropriate grievance resolution process as outlined in the College’s Grievance Policy and Procedure.

7.6 Initial remedial action will, wherever possible, focus on enabling working relationships to continue in a positive and acceptable environment. All allegations will be taken seriously and action taken will be appropriate to the circumstance.

7.7 In cases where allegations of unacceptable behaviour are substantiated it may be appropriate to consider these under the College’s Disciplinary Policy and Procedures. Unacceptable behaviour is potentially gross misconduct and, therefore, if a complaint is upheld it could lead to dismissal.

7.8 Whilst physical attacks may fall under the scope of the College’s Disciplinary Policy and Procedure, consideration should be given to reporting the attack to the police. A copy of the College’s Verbal and Physical Abuse (Violence) Policy and Procedure is available here: https://intranet.royalholloway.ac.uk/staff/assets/docs/pdf/health-and-safety/verbalandphysicalabusepolicy.pdf.

7.9 If it is felt advisable to separate the two parties, consideration will be given to appropriate action that provides a safe working environment for all concerned.
7.10 The College takes seriously malicious complaints or false accusations of unacceptable behavior. If an individual brings a complaint that is found to be false, mischievous or malicious then appropriate action will be taken. This may include disciplinary action. The mere fact that a complaint is not found to be justified does not mean it is false or has been made in bad faith.

7.11 The College will be implementing a new online reporting platform where anonymous complaints can be logged. The data collected will be monitored and any identified trends investigated.

8 Confidentiality

8.1 Where a complaint of unacceptable behaviour has been brought against an individual member of staff using the grievance procedures, that member of staff will be informed of the nature of the grievance and in accordance with the principles of natural justice will be provided with a copy of the written grievance following the investigation meeting held with the complainant.

8.2 As far as reasonably practicable, confidentiality will be maintained throughout the grievance procedure. However, there may be a need to directly involve others e.g. witnesses. Where it is necessary to directly involve others the importance of confidentiality within the procedure will be emphasised. It will also be explained to the others involved that any breach of confidentiality may lead to disciplinary action.

8.3 In exceptional circumstances it may be difficult for confidentiality to be respected, for instance where a possible criminal offence has been disclosed. Employees should also understand that in some circumstances any demand for confidentiality may make it difficult for the College to deal with the matters raised. If confidentiality is a problem, members of staff are advised to discuss this with the Human Resources Department.

9 Policy Schedule

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Appendix 1: Expanded Definitions

These definitions expand on those provided in section 4 of this policy.

10.0 Bullying and Harassment

Bullying or harassment is behaviour or actions that are unwelcome, unwarranted and causes a detrimental effect. Bullying and harassment may be verbal, nonverbal, written, or physical.

10.1 Bullying

10.11 Bullying is offensive, intimidating, malicious, or insulting behaviour that can make a person feel vulnerable, upset, humiliated, undermined or threatened. It can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example but is not limited to:

- Shouting at, being sarcastic towards, ridiculing or demeaning others;
- Physical or psychological threats;
- Overbearing and intimidating levels of supervision;
- Inappropriate and/or derogatory remarks about someone's performance;
- Abuse of authority or power by those in positions of seniority; or
- Deliberately excluding someone from meetings, work opportunities or communications without good reason.
- Ridiculing or demeaning behaviour including displaying inappropriate material that could offend someone in relation to a Protected Characteristic;
- Spreading malicious rumours or insulting someone particularly on grounds of protected characteristics. The University will consider acts as bullying that are outside the legal definition of harassment under equality legislation;
- Systematic belittling, intimidation or exclusion;
- Constantly criticising or removing duties and responsibilities without good reason;
- Unfair treatment that discriminates against people with Protected Characteristics for example telling racist or homophobic jokes in the office or in student accommodation;
- Misuse of power or position in, for example, line management or supervision directed at staff (usually at a lower grade), or senior academics directed at other academic grades including where the other person is a Head of Department.
- Making threats without foundation or inciting others to do so;
- Inappropriate acts towards students/staff/visitors including racist, sexist or homophobic behaviours.
- Any other action which is done which harms dignity, safety and well-being.

Such actions will not be tolerated anywhere including in, for example, the classroom, the laboratory, the office, sporting events, social events, or in cyberspace.

10.12 The following are not acceptable excuses for actions which may harm dignity, safety and well-being:

- A 'clash of personalities';
• It is deemed to be character building;
• It is a manifestation of an individual’s ‘management’ or ‘leadership’ style;
• It was provoked by the victim.

10.13 Bullying or harassment does not include:

• managers giving reasonable instructions to staff in the course of their employment;
• legitimate, reasonable and constructive criticism of a worker’s performance or behaviour;
• College staff giving reasonable instructions to students.

10.2 Harassment

10.21 Harassment takes many forms, occurs on a variety of different grounds and can be directed at one person or many people. Harassment is conduct that it is unwanted by the recipient and which the recipient finds offensive or unacceptable. It can include unwelcome physical, verbal or non-verbal conduct and also circulating information or images via e-mail or the internet. Conduct can be harassment even if it was not intended to violate the recipient’s dignity if it has that effect.

10.22 Unwanted or offensive conduct may need to be considered alongside academic freedom which permits the exploration of controversial topics in the context of teaching or research and in this situation would not normally constitute harassment.

10.23 Conduct normally becomes harassment if it is persisted in once it has been made clear that it is regarded by the recipient as offensive, although a single incident may amount to harassment if it is sufficiently serious.

10.24 Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. It may also include victimising someone because they have been willing to challenge harassment. Harassment is unacceptable even if it does not fall within any of these categories. Harassment of a sexual nature will also be dealt with under the definition of sexual misconduct below.

10.25 Harassment may include, for example:

• unwanted physical conduct
• continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
• sending or displaying material that is pornographic or racist or that some people may find offensive (including e-mails, text messages, 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);
• racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
• outing or threatening to out someone as lesbian, gay, bisexual or transsexual;
• offensive e-mails, text messages or social media content;
• mocking, mimicking or belittling a person’s disability or physical appearance;
• isolation or non-co-operation and exclusion; or
• Intrusion by pestering, spying and stalking.

10.26 A person may be harassed even if they were not the intended “target”. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

11.0 Racism and Microaggression

11.1 Harassment can take the form of microaggressions which have increasingly replaced more overt acts of discrimination. These subtle ‘put-downs’ can be considered ambiguous and thus more difficult to prove.

11.2 Microaggression is defined as a brief, everyday interaction that sends a denigrating message to a person because they belong to a racial minority group. Compared to more overt forms of racism, racial microaggressions are subtle and insidious, often leaving the victim confused, distressed and frustrated and the perpetrator potentially oblivious to the offence caused. (From the Equality and Human Rights Commission’s Report on ‘Tackling racial harassment: Universities challenged.’)

11.3 Microaggressive acts are behaviours that are often based on stereotypical assumptions made about ethnic minority people because of their race or appearance. Microaggressions can be verbal, non-verbal or environmental. Examples of microaggressions are:

• Use of dismissive comments about foreign accents and command of the English language to question the professional competence of ethnic minority staff
• A cumulative and alienating pattern of repeated slights and insults which are dismissed as victims being ‘oversensitive’, with such incidents viewed as isolated events
• Offensive comments that are often justified as ‘jokes’ or ‘banter’
• Being ignored or excluded from conversations or group activities
• Being exposed to racist material or displays

11.4 This list is not exhaustive and all incidents will be dealt with on an individual basis. For more information, please refer to the College’s Guide to Microaggressions at Work.

12.0 Sexual misconduct
12.1 Sexual misconduct can occur between individuals who know each other, have an established relationship, have previously engaged in consensual sexual activity, and between individuals who do not know each other. Sexual misconduct can be committed by persons of any gender identity, and can occur between people of the same or different sex.

12.2 Prohibited behaviours with regard to sexual misconduct include but are not limited to:

- Creating a hostile environment/sexually hostile environment
- Domestic/relationship violence
- Stalking
- Invasion of privacy
- Sexual misconduct including:
  - Non-consensual sexual contact (sexual assault);
  - Non-consensual sexual penetration (rape);
  - Engaging in sexual activity without obtaining effective consent;
  - Coercion;
  - Sexual exploitation.

12.3 The following definitions are provided for information and guidance and will be used when any investigation is being undertaken. This list is not intended to be exhaustive and all incidents will be dealt with on an individual basis.

**Coercion**

12.4 Coercion is forcing another person to act based on fear of harm to self or others. Means of coercion may include, but are not limited to, pressure, threats, emotional/psychological intimidation, or the use of physical force.

**Domestic Violence/Relationship violence in intimate relationships**

12.5 Domestic/Relationship violence is defined as actual or threatened psychological or physical violence, intimidation, or other forms of physical or sexual abuse that would cause a reasonable person to fear harm to self or others. For this policy, “intimate relationship” means marriage, domestic partnership, engagement, casual or serious romantic involvement and dating, whether in a current or former relationship.

**Effective consent**

12.6 The definition of consent as defined in the Sexual Offence Act 2003 is agreeing by choice and having the freedom and capacity to make that choice.

12.7 When engaging in sexual behaviour of any kind it is important to obtain the informed and effective consent of each partner. Effective consent must be obtained for each instance and each escalation of sexual activity. Obtaining effective consent is the responsibility all parties involved.
12.8 Effective consent is:
- Informed, that is mutually agreed specific sexual activities;
- freely and actively given on each occasion/activity;
- mutually understandable words or actions that indicate a willingness to participate in agreed upon sexual activity.

12.9 Consent is not effective when:
- there is only silence or passivity;
- the use of intimidation, coercion, threats, force, or violence negates any consent obtained;
- it is obtained from an individual who is incapable of giving consent due to one or more of the following or other reasons:
  - a relevant mental, intellectual, or physical disability;
  - is under the legal age to give consent;
  - is asleep, unconscious, or physically helpless;
  - is incapacitated by alcohol or other drugs;

12.10 Consent to sexual activity at one time does not imply consent to the same or other sexual activity at any other time. A person can withdraw consent at any time.

Responsibility for obtaining effective consent

12.11 For the purpose of this policy the responsibility for obtaining effective consent is held by all parties involved. Failing to obtain effective consent is a violation of this policy.

12.12 Individuals involved in sexual activity assume responsibility for their behaviour and must understand that the use of alcohol or other drugs does not reduce accountability for their actions. When involved in sexual activity the question is whether a sober and reasonable person in the same position should have known whether another person gave, or was able to give, effective consent.

12.13 Refusal, lack of consent, or non-consent may be expressed in many ways, verbally or physically. Physical resistance is not necessary to communicate a lack of consent. It is not necessary to resist physically or express verbally to indicate a lack of consent.

Force

12.14 Force may include words, conduct, or appearance. Force includes causing another’s intoxication or impairment through the use of drugs or alcohol. Coercion, intimidation, and non-physical threats can all be forms of force.

Hostile environment

12.15 A hostile environment is created if conduct undertaken is sufficiently severe, persistent or pervasive to limit the recipient’s ability to participate in or benefit from their environment or creates a hostile or abusive environment.
Incapacitation

12.16 Incapacitation is the physical and/or mental inability to make informed, rational judgments and decisions. States of incapacitation include sleep and blackouts. Where alcohol or other substances are involved, incapacitation is determined by how the substance impacts a person’s decision-making capacity, awareness of consequences, and ability to make informed judgments.

12.17 In evaluating whether a person(s) was incapacitated for purposes of evaluating effective consent, the following will be considered:

i. Did the person(s) initiating sexual activity know that their partner(s) was/were incapacitated?

If not,

ii. would a sober, reasonable person in the same situation have been able to recognise that the partner(s) was/were incapacitated?

If the answer to either of these questions is “yes,” effective consent was absent.

12.18 For purposes of this policy, incapacitation is a state beyond drunkenness or intoxication. A person is not incapacitated merely because they have been drinking or using drugs.

12.19 The standard for incapacitation does not turn on technical or medical definitions, but instead focuses on whether a person has the physical and/or mental ability to make informed, rational judgments and decisions. A person must look for the common and obvious warning signs that show that a partner may be incapacitated or approaching incapacitation. Although every individual may manifest signs of incapacitation differently, typical signs include slurred or incomprehensible speech, unsteady gait, combativeness, emotional volatility, vomiting, or incontinence. A person who is incapacitated may not be able to understand some or all of the following questions: “Do you know where you are?” “Do you know how you got here?” “Do you know what is happening?” and “Do you know who else is here?”

12.20 Because the impact of alcohol and other drugs varies from person to person, one should be cautious before engaging in sexual contact or intercourse when either party has been drinking alcohol or using other drugs. The introduction of alcohol or other drugs may create ambiguity for either party as to whether effective consent has been sought or given. If one has doubt about either party’s level of intoxication, the safe thing to do is to forgo all sexual activity.
Invasion of privacy

12.21 This includes, but is not limited to, recording, photographing, or transmitting images or other personal aspects, including those of private sexual activity and/or the intimate parts of another person without effective consent; allowing third parties to observe images, including private sexual acts without effective consent; engaging in voyeurism without effective consent.

Retaliation

12.22 Retaliation includes threats, intimidation, reprisals, and/or adverse employment or educational actions against a person based on their report of prohibited conduct or participation in the investigation, report, remedial, or disciplinary processes provided for in this Policy.

Non-consensual sexual penetration (rape)

12.23 This is defined as the sexual penetration of any orifice with a body part or other object without effective consent. This could be committed by force, threat, intimidation, coercion, or through exploitation of another’s mental or physical condition (such as lack of consciousness, incapacitation due to drugs or alcohol, age, or disability) of which the respondent was actually aware or which a reasonable person in the respondent’s position should have been aware.

Sexual assault

12.24 Non-consensual sexual contact (sexual assault) is defined as any physical contact with another person of a sexual nature without that person’s effective consent. The touching of a person’s intimate parts (such as genitalia, groin, breast, buttocks, mouth, or clothing covering same); touching a person with one’s own intimate parts; or forcing a person to touch another’s intimate parts would be violations of this policy if they occur without effective consent.

12.25 Sexual assault is also defined as the sharing of private, sexual materials, either photos or videos, including digital, of another person without their consent and with the purpose of causing embarrassment or distress.

Sexual exploitation

12.26 Sexual exploitation is taking sexual advantage of another person and includes, without limitation: indecent exposure; causing or attempting to cause the incapacitation of another person in order to gain a sexual advantage over him or her; causing the prostitution of another person; and knowingly or recklessly exposing another person to a significant risk of sexually transmitted infection.
Stalking

12.27 Stalking is a course of conduct involving more than one instance of unwanted attention, harassment, unwanted physical or verbal contact, use of threatening words and/or conduct, or any other course of conduct directed at an individual that could be reasonably regarded as alarming or likely to place that individual in fear of harm or injury, including physical, emotional, or psychological harm. Stalking can be undertaken by any means, including social media etc.

Note: Appendix 1 has been adopted from Lancaster University’s Bullying, Harassment and Sexual Misconduct Policy – Staff Procedure with their permission.