

Dignity at King's – Bullying & Harassment Policy

Policy Category:	General
Subject:	Bullying and Harassment
Approving Authority:	SMT
Responsible Officer:	Senior Vice-President (Operations)
Responsible Office:	Human Resources; SED; Equality, Diversity & Inclusion
Related Procedures:	Statement on Freedom of Expression Grievance Procedure: Research, teaching-only and Professional Services Staff Academic Staff Regulation pertaining to Grievance Procedure Disciplinary Procedure: Research, teaching-only and Professional Services Staff Academic Staff Regulation pertaining to Disciplinary & Related Procedures
Related College Policies:	Equality, Diversity & Inclusion Policy
Effective Date:	24 September 2020
Supersedes:	New
Next Review:	January 2022

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1. General principles

- 1.1. King's is committed to being an environment free from bullying and harassment, prejudice, and discrimination. The purpose of this policy is to set out the expected behaviours of all members of the King's Community (staff, students, and visitors, both on our campuses and online) to bring to life our zero-tolerance approach and to ensure that the range of options and support for staff and students who feel they have been bullied or harassed is clear.
- 1.2. 'Staff' includes academic (including research and teaching) and professional services staff. 'Students' includes undergraduate and postgraduate (taught and research) students.
- 1.3. This policy applies to all the King's Community. It covers bullying or harassment which occurs at work and also outside of the workplace when on College business. This includes business, international, academic or research events, and social functions related to the College¹. This policy may also apply if the victim is not a member of the King's Community, but

¹ For colleagues who are members of staff of King's Health Partners the provision of the Mutual Recognition Agreement shall apply where applicable.

the alleged bully or harasser is. Bullying and harassment are defined in sections 3 and 4 and examples of behaviour that may be either bullying or harassment are given in section 5.

- 1.4. In addition to the negative impact on individuals and the King's Community, bullying and harassment may have a negative impact on the College's reputation and its relationships with partners and funding organisations. This policy also recognises and responds to expectations and specific requirements set as part of grant conditions by partners and funding organisations.
- 1.5. Equality, diversity and inclusion are cornerstones of the College's [Strategic Vision 2029](#). A key guiding principle of this vision is to create an inclusive environment where all individuals are valued and able to succeed, free from bullying and harassment. As a leading international university, the College aims to embed inclusion in its practice and culture to provide an extraordinary student experience and to be an employer of choice. Leaders at King's aim to foster environments free of bullying and harassment, ensure that managers and supervisors have the tools to address issues that arise, and monitor the effective use of those tools within their faculties and directorates.
- 1.6. Instances of bullying and harassment will be taken seriously and staff and students who make complaints of bullying and harassment will be provided with support.
- 1.7. Instances of bullying and harassment can be complex, involving multiple people and factors. The College recognises that bullying and harassment can be the result of organisational and cultural issues as well as individual ones.
- 1.8. Freedom of speech and expression are key values of the College. Vigorous speech and comment, academic debate and legitimate management of performance of staff can be distinguished from the behaviours outlined in this policy. For more information on this please refer to the College's [Statement on the Freedom of Expression](#).
- 1.9. King's staff are required to act in accordance with this policy. However, this policy does not form a part of the contract of employment and it may be amended at any time.
- 1.10. This policy will be monitored on an ongoing basis by Equality, Diversity & Inclusion, and will be formally reviewed at least every three years. Equality, Diversity & Inclusion reports to the College Senior Management Team and Council regularly via the [Equality Diversity and Inclusion Committee \(EDIC\)](#).
- 1.11. The following may be treated as misconduct under the College's disciplinary regulations for academic and non-academic staff:
 - 1.11.1. failing to comply with this policy;
 - 1.11.2. making false or malicious allegations under this policy; or
 - 1.11.3. retaliating against or victimising staff or students who make complaints or participate in good faith in investigations under this policy.

2. Who is responsible for this policy?

Managers and supervisors

- 2.1. All managers have a responsibility to demonstrate and promote good practice to ensure a working and studying environment that is inclusive and respects the expectations laid out in this policy. Managers are required to implement this policy in their area, and to ensure that all of their staff and students are aware of this policy.
- 2.2. When bullying or harassment has been reported or alleged, managers should:
 - 2.2.1. promptly explore what has happened and endeavour to remedy the situation;
 - 2.2.2. seek to protect the complainant(s) from victimisation by colleagues and students;
 - 2.2.3. contact Human Resources (for staff) or Student Conduct & Appeals (for students) for advice on the application of this policy if necessary; and
 - 2.2.4. support any member of staff or student who makes a complaint or about whom a complaint is made throughout the process.

Individual members of the King's Community

- 2.3. The College expects all members of the King's Community to treat each other with respect, courtesy and consideration. All members of the King's Community have the right to expect professional, respectful and inclusive behaviour from each other and have a reciprocal responsibility to behave professionally, respectfully and inclusively towards others. All members of the King's Community have a personal responsibility to ensure that their conduct is in accordance with the standards set out in this policy and the overarching [Equality, Diversity and Inclusion Policy](#).
- 2.4. All members of the King's Community are expected to actively promote and foster a working and learning environment that is free from bullying and harassment. They must take reasonable measures to ensure that bullying and harassment does not occur within the College.
- 2.5. If members of the King's Community witness bullying or harassment, and it is safe to intervene, they are encouraged to be *active bystanders* by speaking up. The [It Stops Here](#) campaign, a collaboration between the College and King's College London Student's Union (KCLSU), offers community support and training, including about how to be an *active bystander*.

3. What is bullying?

- 3.1 Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority. It can include both personal strength and the power to coerce through fear or intimidation.
- 3.2 The College recognises that there are a number of power dynamics that can arise in a university, for example between a lecturer and a student or a researcher and their supervisor. The College is alert to the potential for bullying and harassment to occur where there is an imbalance in power.

- 3.3 Bullying may include (without limitation):
 - 3.3.1 physical or psychological threats;
 - 3.3.2 overbearing and intimidating levels of management or supervision;
 - 3.3.3 inappropriate or derogatory remarks about someone's performance;
 - 3.3.4 public shaming or humiliation in front of others; and
 - 3.3.5 purposefully ignoring an individual's work or contributions in class.
- 3.4 Bullying may also include subtle or insidious acts including (without limitation):
 - 3.4.1 unequal treatment in the application of conditions of employment;
 - 3.4.2 unreasonable pressure to complete tasks;
 - 3.4.3 unfair allocation of work or assigning more work to an individual than others;
 - 3.4.4 unreasonably withholding permission to attend training and development opportunities including promotion, academic conferences or similar events;
 - 3.4.5 persistent criticism;
 - 3.4.6 spreading malicious rumours; and
 - 3.4.7 making threats or comments about job security without foundation.
- 3.5 Cyber bullying is any form of bullying that is carried out online using electronic media devices such as computers, laptops, smartphones, tablets, or gaming consoles. It can take place on social media platforms such as (but not limited to) Facebook, Instagram, Twitter, WhatsApp, WeChat, LinkedIn, through email, or online collaboration sites such as Microsoft Teams or Zoom.

4. What is harassment?

- 4.1 Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
- 4.2 A person may be harassed even if they were not the intended "target" of the harassing behaviour.
- 4.3 Harassment is unlawful under the Equality Act 2010 if it relates to age, disability, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, or if it is conduct of a sexual nature (sexual harassment).
- 4.4 Gender reassignment is the protected characteristic that protects trans people from discrimination, victimisation, and harassment in employment. Where this policy refers to 'trans people' and the associated terms of 'gender identity' and 'gender expression, this refers to a broad range of people whose gender identity is not expressed in ways that are typically associated with their assigned sex at birth. This includes those who have non-binary, agender or gender fluid identities and individuals who may not identify as trans but who are impacted by matters covered under this policy.

- 4.5 However, the College considers all harassment to be unacceptable, whether or not it relates to a relevant protected characteristic (for example, harassment related to weight and body size, or social class).
- 4.6 The examples provided below are non-exhaustive and do not add any relative importance to any protected characteristic.
- 4.7 **Harassment on grounds of age** may include (without limitation):
- 4.7.1 ageist jokes;
 - 4.7.2 conduct based on stereotypical perceptions about a person because of their age or level of experience; and
 - 4.7.3 intrusive questions about a person's age.
- 4.8 **Harassment on the grounds of disability** may include (without limitation):
- 4.8.1 mocking, mimicking or belittling a person's disability or the disability of someone they care for;
 - 4.8.2 denial of a person's disability;
 - 4.8.3 consistent or repeated failure to provide clearly identified facilities or meet requirements to enable a person to perform their duties or receive an adequate service; and
 - 4.8.4 intrusive questions regarding a person's impairment.
- 4.9 **Harassment on grounds of gender identity and gender expression** may include (without limitation):
- 4.9.1 jokes about gender identity and/or expression;
 - 4.9.2 deliberately or repeatedly using incorrect pronouns;
 - 4.9.3 not acknowledging a person's affirmed name (known as 'deadnaming'); and
 - 4.9.4 intrusive questions regarding a person's gender identity and/or expression.
 - 4.9.5 Outing a person as trans without their permission or spreading rumours or gossip about their gender identity, expression, and history.
- 4.10 **Harassment on grounds of race** may include (without limitation):
- 4.10.1 racist jokes;
 - 4.10.2 conduct and comments based on stereotypical perceptions and prejudices about a person because of their race;
 - 4.10.3 intrusive questions about a person's race, skin colour, nationality, or ethnic national origins; and

4.10.4 intrusive questions, remarks, comments about a person's appearance or physical touching of a person's hair.

4.11 **Harassment on grounds of religion or belief** may include (without limitation):

4.11.1 jokes about a particular religious group;

4.11.2 behaviour which fails to tolerate, acknowledge or allow participation in religious convictions, beliefs or practices; and

4.11.3 intrusive questions about a person's religion or beliefs.

4.12 **Harassment on grounds of sex** may include (without limitation):

4.12.1 sexist jokes;

4.12.2 conduct based on stereotypical perceptions and prejudices about a person because of their sex; and

4.12.3 intrusive questions regarding a person's sex.

4.13 **Harassment on grounds of sexual orientation** may be experienced by any of the groups above and may include (without limitation):

4.12.1. Homophobic or biphobic jokes, or jokes relating to a person's actual or perceived sexual orientation, relationship, or relationship history;

4.12.2 Outing a person as lesbian, gay or bi¹ without their permission or spreading rumours or gossip about their sexual orientation, relationship, or relationship history; and

4.12.3 intrusive questioning about a person's sexual orientation, partnership, or domestic circumstances.

Sexual harassment

4.13. Sexual harassment (or sexual misconduct) is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that creates an intimidating, hostile, degrading or offensive environment. Sexual harassment may include (without limitation):

4.13.1. unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;

4.13.2. continued suggestions for social activity after it has been made clear that such suggestions are unwelcome; or

4.13.3. unwelcome sexual advances or suggestive behaviour (even if the harasser perceives it as harmless).

4.14. Sexual harassment is complex and may not always be obvious or follow an easily recognisable pattern. It is important to note that:

¹ Bi is an umbrella term used to describe a romantic and/or sexual orientation towards more than one gender. Bi people may describe themselves using one or more of a wide variety of terms, including, but not limited to, bisexual, pan, queer, and some other non-monosexual and non-monoromantic identities.

- 4.14.1. a person can experience unwanted conduct from someone of any gender;
- 4.14.2. conduct may be unwanted even if the person subject to it does not expressly object to it;
- 4.14.3. it may not matter whether the conduct is acceptable to others or is common in the person's work environment;
- 4.14.4. sexual interaction that is invited, mutual or consensual is not sexual harassment because it is not unwanted; and
- 4.14.5. sexual conduct that has been welcomed in the past can become unwanted.

5. Behaviours

- 5.1. The behaviours set out below may constitute bullying or harassment.

Controlling behaviour

- 5.2. Controlling behaviour is behaviour designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Examples may include (without limitation):
 - 5.2.1. separating individuals/teams from the group or team activities within a department/faculty or activities;
 - 5.2.2. denying individuals access to meetings with others without reason or justification;
 - 5.2.3. unjustifiably or unreasonably monitoring emails and communications of a person; and
 - 5.2.4. discouraging access to or refusing permission to access training, seminars, conferences or other career development opportunities.

Coercive Behaviour

- 5.3. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, frighten, or create dependence. Examples may include (without limitation):
 - 5.3.1. making direct or implied threats, such as threatening to revoke authorship and credit on publications and research papers; and
 - 5.3.2. humiliating an individual by criticising them in a public forum, such as by group email/messaging service or in a group meeting.

Gaslighting

- 5.4. Gaslighting is the manipulation by psychological means of a person (or group) which causes them to doubt themselves, their capabilities or their sense of reality. Examples may include (without limitation):

- 5.4.1. a manager criticising an individual's work, then later denying they had done so; and
- 5.4.2. an individual being made to feel that their opinions, concerns, thoughts and feelings are incorrect or lack validity.

Microaggressions

- 5.5. Microaggressions are brief and repetitive verbal, behavioural and environmental indignities, whether intentional or unintentional, that communicate hostile, derogatory, or negative slights and insults to a person or group. Examples may include (without limitation):
 - 5.5.1. asking a person 'where are you *really* from?';
 - 5.5.2. a teacher in the classroom asking for a 'strong man' to help carry equipment; and
 - 5.5.3. comments such as 'you look so normal' to a person with a disability.

Banter

- 5.6. Banter is the exchange of teasing remarks. Communication which some may consider to be banter is not acceptable if it falls into the categories of bullying and/or harassment. Banter may affect the person the comments are directed towards, and others who overhear the comments. Examples may include (without limitation):
 - 5.6.1. making jokes about a person's appearance;
 - 5.6.2. publicly humiliating a person in front of others; and
 - 5.6.3. using 'pet names' such as 'love' or 'sweetheart'.

Victimisation

- 5.7. Victimisation is subjecting a person to detrimental treatment because they have reported bullying and harassment. Examples may include (without limitation):
 - 5.7.1. being marked as a 'trouble-maker';
 - 5.7.2. withdrawal of opportunities for promotion or advancement in academic career;
 - 5.7.3. threats of withdrawing funding or grants; and
 - 5.7.4. withholding resources, information and opportunities.

6. What to do

- 6.1. Below is a list of actions individuals may take if they witness or experience bullying or harassment. While these are presented in order of formality, one step need not be completed before moving to the next. For instance, there will be some cases where early intervention is not appropriate or where a complainant may not feel safe or comfortable in engaging in such steps.

Early intervention

- 6.2. Early intervention is not obligatory and will not always be appropriate, but it can lead to a resolution where an honest and constructive conversation is possible. Such conversations may enable the person who experienced the bullying or harassment to explain how and why something was hurtful and enable the alleged bully or harasser to understand the consequences of their actions. If a member of the King's Community believes they or another member of the King's Community has been bullied or harassed, they may choose to:
- 6.2.1. have an initial discussion with the alleged bully or harasser to raise their concerns;
 - 6.2.2. have an initial discussion with their own, or the alleged bully or harasser's, line manager or supervisor to facilitate a constructive conversation or help address the situation;
 - 6.2.3. members of staff who do not feel comfortable approaching the relevant line manager or supervisor may ask for support from their [HR People Partner](#); and
 - 6.2.4. students who do not feel comfortable approaching the relevant line manager or supervisor, may ask for support from a personal tutor or student adviser or, if this is not appropriate, from KCLSU's Advice team.

Anonymous reporting

- 6.3 If a member of the King's Community has been bullied or harassed or is concerned that another member of the King's Community has been bullied or harassed, they can report the concern anonymously using the College's [Anonymous Disclosure Form](#). Anonymous reporting helps the College to monitor the prevalence of incidents and understand the impact of initiatives run by the College and King's College London Student's Union (KCLSU). The College will not be able to offer direct advice to users of the form or initiate any formal procedures in response to any reports disclosed using the form
- 6.3.1. Anonymous disclosures can be made at any time and can be made alongside any of the listed action within this policy.

For members of staff

- 6.4. **Mediation** is an informal, voluntary process where a neutral third party is appointed to support the parties involved in a dispute in reaching a satisfactory outcome. The purpose of mediation is to create a safe environment where parties can communicate and work towards the restoration of a positive working relationship. The Case Management Team, part of HR, will arrange mediation if it is appropriate and if the complainant is comfortable engaging in it. It should be noted that a person can request mediation without making a formal complaint.
- 6.5. **Grievances** may be raised by employees who have been bullied or harassed or who consider that another member of the King's Community has been bullied or harassed. In addition, managers may engage the disciplinary procedures to deal with occurrences of bullying and harassment they become aware of. It is not necessary for a grievance to have been issued for a manager to take this step. The relevant policies are:
- 6.5.1. [Grievance Procedure: Research, Teaching-only and Professional Services Staff](#);
 - 6.5.2. [Academic Staff: Regulation pertaining to Grievance Procedure](#);

6.5.3. [Disciplinary Procedure: Research, Teaching-only and Professional Services Staff](#); and

6.5.4. [Academic Staff: Regulation pertaining to Disciplinary and Related Procedures](#).

For students

- 6.6 [King's Legal Clinic Mediation Project](#) is a free-to-use King's Community mediation service. The project is a collaboration between the Clinic and the KCL Pro Bono Society. The Clinic offers the support of trained King's Community mediators who will facilitate a conversation that hopefully results in an agreement with which everyone is satisfied.
- 6.7. [Student Conduct and Appeals Office \(SCA\)](#) investigate reported instances of bullying or harassment relating to students. Students who wish to make a complaint in relation to bullying or harassment should refer to SCA. If appropriate, HR and SCA will work together on cases involving both staff and students. Students are advised to contact [KCLSU Advice](#) for support and guidance on the procedures followed by SCA.
- 6.8. **Postgraduate Research (PGR) Students** may be both a student and a member of staff. PGR students may address complaints to SCA or use the grievance or staff misconduct complaint procedures if appropriate. The College recognises the complexities in relation to PGR students. KCLSU Advice offers support and guidance to PGR students and has dedicated PGR Staff to support enquiries.

7. Support

- 7.1. Bullying and harassment can cause humiliation, isolation, loss of confidence and serious harm to mental health and wellbeing in both the short-term and longer-term. The following support and services are available to members of the King's Community who have experienced, witnessed or been accused of bullying and harassment.
- 7.2. This Policy outlines the sources of support for all of the King's Community at university level. Local departments and faculties may also have some support, so please check your local Faculty pages for further information.

For staff and students

- 7.3. [King's College London NHS Health Centre](#) is based at Bush House and was established in 2001 to provide health care for staff and students of the College. As well as regular GP and Nurse consultations, they can refer patients to internal and external counselling services.
- 7.4. [Togetherall](#) supports people who are experiencing stress, are struggling to sleep or simply need someone to talk to. It is available to staff and students. The service supports users to talk about their experiences, express themselves creatively and provides access to a library of self-care resources. Trained counsellors are online 24/7 to keep all members safe and provide extra support. Togetherall is completely anonymous, so no one needs to know you are using the service unless you tell them. To access initially, sign up under 'Organisation' with your College e-mail address (that is your King's ID@kcl.ac.uk).
- 7.5. [The Haven](#) is a network of three specialist sexual assault referral centres provided by King's College Hospital NHS Foundation Trust. Their medical and emotional support services are confidential, so they won't tell anyone you've contacted them unless you want them to.
- 7.6. [The College Chaplaincy](#) is a resource for the whole of the King's Community and includes Chaplains from a number of faiths. There are Chaplains at each of the campuses who are available to see any member of staff or student in confidence. You do not have to be of any faith or any particular faith to see a Chaplain: they are practiced listeners and have a wealth of experience in supporting people through relationship, work and study difficulties, spiritual and vocational issues, and can signpost to other services.
- 7.7. **External services** are available and Equality, Diversity and Inclusion have signposted a number of these on [their website](#).

For staff

- 7.8. [The Wellbeing Hub](#) has a variety of initiatives developed to support staff.
- 7.9. [Employee Assistance Programme \(EAP\)](#) provides independent expert advice on both home and work concerns for employees. This service is entirely independent from the College and is confidential. The EAP is paid for by the College and is free to College employees and the services are independent and confidential.
- 7.10. [Five trade unions](#) are recognised by the College: UNISON, UNITE, UCU, the BMA and BDA. Members of staff who are union members can contact their union for support, representation and advice on any aspect of this policy.
- 7.11. [Staff Networks](#) provide support to staff with particular protected characteristics and help to develop a sense of community through shared experience.

For students

- 7.12. [KCLSU Advice](#) provides free, confidential and impartial academic advice to students in respect of issues affecting their studies. KCLSU Advice also have dedicated PGR Advisors.
- 7.13. [Student counselling](#) is offered by the College free of charge. The counselling service offers a safe, confidential and supportive space to help explore problems, share and gain insight into feelings, thoughts and behaviour.
- 7.14. [KCLSU Wellbeing](#) offer a range of initiatives that focus on using the holistic '5 Ways to Wellbeing' as a framework to take a positive and proactive approach to wellbeing.
- 7.15. [KCLSU Student Networks](#) are student communities who exist to connect students of shared experience and protected characteristics.