

Keble College Policy on Harassment (including Sexual Harassment), Bullying and Victimisation

Introduction

1. This policy applies to all members of the College, including all employees, staff (including casuals), students, fellows and all contractors to the college. The policy covers harassment, bullying and victimisation.
2. The College is committed to fostering an inclusive culture which promotes equality, values diversity, and maintains a working, learning, and social environment in which the rights and dignity of all members of the College community are respected. The College does not tolerate any form of harassment, bullying or victimisation.
3. The College expects all members of the College community, and contractors to treat each other with courtesy and consideration.
4. The aims of the College as reflected in this Policy are to:
 - a. promote a positive environment in which people are treated fairly and with respect;
 - b. make it clear that harassment, bullying and victimisation are unacceptable, recognising that those behaviours may cause harm, physically or emotionally, and that all members of the College have an active role to play in creating an environment free from harassment, bullying or victimisation;
 - c. provide a framework of support for staff and students who feel they have been subject to harassment, bullying or victimisation, and
 - d. provide a mechanism by which complaints can wherever possible be addressed appropriately and in a timely way.
5. Those in positions of authority, such as senior Officers of the College, managers, and members of the Governing Body, have formal responsibilities under this Policy and are expected to familiarise themselves with the Policy on appointment. All managers have a duty to implement this Policy and to take reasonable steps to ensure that harassment, bullying and victimisation do not occur in the areas of work for which they are responsible; and that if they do occur, any concerns are taken seriously and dealt with appropriately under this Policy and the relevant Procedures.
6. This Policy applies to the College's premises as well as at a work-related social event, outside of the workplace such as a site visit or visiting a client's home or place of work, and on social media or any online communication such as emails, video conference calls or phone calls.

Definitions

7. **Harassment prohibited under this policy** is defined as behaviour meeting one or more of the following criteria:
 - a. **Conduct** on at least two occasions in relation to another person which the person whose conduct is in question knows or ought to know amounts to harassment of the other
 - b. Conduct on at least one occasion in relation to two or more other persons which the person whose conduct is in question knows or ought to know amounts to harassment of them, and by which the person whose conduct is in question intends to persuade any person (whether or not one of those mentioned earlier) either
 - i. not to do something that they are entitled or required to do or
 - ii. to do something that they are not under any obligation to do¹

¹ Summarised from the Protection from harassment Act 1997 section 1(1), 1(1A) and s7(3).

- c. Unwanted conduct related to a protected characteristic or 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,² or;
- d. Unwanted conduct of a **sexual nature** or related to **gender reassignment** or **sex** that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment and because of the alleged victim's **rejection of or submission** to the conduct the alleged perpetrator **treats the alleged victim less favourably** than they would have done had the alleged victim not have rejected or submitted to the conduct.³

A protected characteristic means age, disability, gender reassignment, marriage or civil partnership, pregnancy, maternity, race (including ethnicity or national origin), religion or belief, sex, or sexual orientation.⁴

- 8. **Bullying** prohibited by this policy is unwanted behaviour that is offensive, intimidating, malicious or insulting, or an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.
- 9. Factors which will be taken into account when deciding whether harassment or bullying have occurred include the intentions of the alleged perpetrator and the perception of the alleged victim, including the extent to which that perception is in all the circumstances reasonable.
- 10. **Harassment** and **bullying** may take place face to face or through other forms of communication, including but not limited to written communications and communications via any form of digital media. It can be verbal and/or physical. It may be direct to the person concerned or to a third party.
- 11. Being under the influence of alcohol or drugs, or otherwise intoxicated, is not an excuse for harassment or bullying.
- 12. **Victimisation** in a College context means subjecting someone to detrimental treatment because they have done, or you believe that they have done or may do, one of the following:
 - a. made an allegation of harassment, bullying or discrimination;
 - b. indicated an intention to make such an allegation;
 - c. assisted or supported another person in bringing forward such an allegation;
 - d. participated in an investigation of a complaint;
 - e. participated in any disciplinary hearing arising from an investigation, or;
 - f. taken any other steps in connection with this Policy.⁵
- 13. Freedom of speech and academic freedom are central tenets of College life as set out in our [Code of Practice on Freedom of Speech](#). The time, place and manner of expression may be relevant. Exposure to any of the following is unlikely to amount to harassment:
 - a) the content of higher education course materials, including but not limited to books, videos, sound recordings, pictures;
 - b) statements made and views expressed by a person as part of teaching, research or discussions about any subject matter which is connected with the content of a higher education course;
 - c) academic debate, including vigorous and robust debate.

² Summarised from Equality Act 2010 section 26(2).

³ Summarised from Equality Act 2010 section 26 (3)

⁴ Summarised from the Equality Act 2010 section 4.

⁵ Summarised from Equality Act 2010 section 27, translated into actions that might arise in a College context.

14. Reasonable management/criticism of work or the commencement of internal college procedures are not themselves a form of bullying or harassment.
15. Harassment and bullying may take a variety of forms. [Appendix A](#) (SSO access) sets out a non-exhaustive list of examples of such behaviours.

Application of this Policy

Reporting:

16. **Harassment, bullying and victimisation** are serious forms of **misconduct**. Members of the College community who consider that they have been subject to harassment, bullying or victimisation or have witnessed such behaviour may make a **report**. For reports **relating to the behaviour of**:
 - a student of the College – report to the **Dean**;
 - a lecturer or tutor who is not a Fellow – report to the **Senior Tutor**;
 - a member of College Staff – report to the **HR Manager or Bursar**;
 - a College Fellow – report to the **Warden**;
 - a guest of a student of the College - report to the **Dean** in the first instance
 - a third party – report to **HR Manager or Bursar**;
 - an alumnus – report to the **Warden**If the designated College officer listed above is either not available, or is the subject of the report, reports may be made to any other of the officers listed.

University Procedures:

17. Incidents of harassment that occur within a University context will normally be dealt with under University procedures and policy. This includes alleged harassment by students of a college other than Keble, in which case a report can be made to the Proctors. Advice and support on how to make a report to the Proctors can be provided for by the Dean and/or College Harassment Advisors. For matters relating to a member of University staff who is not linked to the College please consult the [University Harassment Policy/Procedure](#).

College Procedures:

18. Where the responsible officer or manager judges a report to raise sufficient grounds for investigation, the College will investigate and if necessary, take action. This will take place under the **appropriate College Procedure**. For reports **relating to the behaviour of**:
 - a student of the College – [Non-Academic Misconduct: Code & Procedure](#);
 - a member of College Staff – [Employee Disciplinary Procedures](#)
 - a College Fellow – *the [College Statutes](#)*;
 - a third party – ***Pending College Procedure***
19. Wherever possible, the College will be guided by the wishes of those who have been subjected to alleged harassment in determining whether or not to begin formal procedures and in general will only usually investigate if they have received a formal report. However the College reserves the right to investigate in the absence of a report from the person who has been subjected to alleged harassment or even where they do not wish any action to be taken in certain circumstances (for example, where the alleged behaviour indicates a risk to others in the College community).

Informal Resolution:

20. Where appropriate and where the alleged victim wishes, reports of harassment, bullying or victimisation may be resolved informally without recourse to formal investigation or other procedures.

Precautionary Measures:

21. Where necessary, the College may also implement precautionary measures to ensure the safety of those involved or others on the College site. These may include (but are not limited to) precautionary measures under the [Non-Academic Misconduct: Code and Procedure](#), or suspension or action short of suspension under the [Employee Disciplinary Procedure](#).
22. No action will be taken against someone making a report of harassment, bullying or victimisation which proves to be unfounded if the report is judged to have been made in good faith. However, if someone is deemed to have known or to have reasonably been expected to know that a report was unfounded, the allegation of harassment, bullying or victimisation may be judged to be vexatious or malicious, and disciplinary action may be taken in accordance with the relevant procedure.

Confidentiality:

23. All parties involved in a matter (including any witnesses who may be interviewed as part of any investigation, or other members of the College community, and/or trade union representatives supporting any of the parties) should maintain the confidentiality of the process. Where possible, those involved in advising complainants should seek the consent of the individual for the onward disclosure of relevant information to those with a clear need to know. Where such consent is not forthcoming, the person entrusted with the information should make it clear that, in exceptional circumstances, it may be necessary to disclose the information.

Responsibilities

24. The Governing Body has overall responsibility for this Policy and for ensuring that the College takes all reasonable steps to promote and maintain an environment where neither harassment, bullying or victimisation is tolerated.
25. Responsibility for the operation and application of this Policy is delegated to the *Dean* in respect of the conduct of student members; to the *Warden* in respect of the conduct of Fellows of the College; and to the *Bursar* in respect of the conduct of employees of the College.
26. HR and Equality Committee, reporting into the Governing Body, is responsible for:
 - (i) overseeing the actions in respect of this Policy of those to whom responsibility under this Policy has been delegated;
 - (ii) receiving assurance and reporting on the application and effectiveness of this Policy for onward reporting to Governing Body.
27. All members and employees of the College are responsible for familiarising themselves with and adhering to this Policy.
28. This Policy was agreed by Governing Body on 3 December 2025 and will be subject to regular review by HR and Equality Committee reporting into the Governing Body.