



Oxford Prospects Programmes

Harassment Policy

Oxford Prospects Programmes (OPP) does not tolerate bullying, harassment or victimisation in any circumstances.

General

1. For the purposes of this policy, harassment is any unwelcome comment or conduct that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Unwelcome comments may constitute harassment whether they are made orally or in writing and whether or not they are made face to face. Conduct does not have to be repeated to constitute harassment.

2. Unwanted behaviour as harassment

To be harassment, the unwanted behaviour must have either:

-violated the person's dignity

-created an intimidating, hostile, degrading, humiliating or offensive environment for the person

It can be harassment if the behaviour:

-has one of these effects even it was not intended

-intended to have one of these effects even if it did not have that effect

By law, whether someone's behaviour counts as harassment depends on:

-the circumstances of the situation

-how the person receiving the unwanted behaviour views it

-if the person receiving the behaviour is 'reasonable' to view it as they do

If someone makes a harassment claim to an employment tribunal, the judge would consider whether a 'typical' person would see the behaviour as harassment.

3. Examples of conduct that fall foul of this policy include:

- Making intimidating or threatening remarks
- Repeatedly undermining someone, putting them down or unfairly criticising them
- Making derogatory personal comments
- Making sexist, ageist, racist, ableist, homophobic or transphobic jokes directed at an individual
- Inappropriate touching
- Stalking
- Making malicious allegations of harassment or other wrongdoing

4. OPP expects all staff, contractors and students to help to prevent harassment by:

- Being sensitive to the needs and reactions of others
- Making reasonable efforts to avoid causing offence
- Making it clear to others where necessary that harassment is not acceptable

5. All OPP staff, contractors and students have a right to be protected from harassment under this policy. Any allegation of harassment – regardless of whether the alleged victim and the alleged perpetrator are staff, contractors or students – should be directed to the Operations Manager, or if the Operations Manager is Unavailable, to the Deputy Operations Manager. Any allegations concerning the operations team should be escalated to the Programme Manager.

6. OPP reminds its staff, contractors and students that harassment is against the law where it relates to characteristics protected by the Equality Act 2010. Anyone guilty of this will be subject to our internal disciplinary procedures and a record of this conduct may be stored and shared with other institutions affiliated with the perpetrator.

Victimisation

7. Victimisation occurs when somebody is bullied or receives less favourable treatment as a result of making an allegation of harassment or other wrongdoing.

8. OPP regards victimisation as a form of harassment and will treat it accordingly.

Addendum: Sexual Harassment, October 2024.

Definition of Sexual Harassment

Sexual harassment is any unwanted behaviour of a sexual nature that makes someone feel offended, humiliated, or intimidated. It can include, but is not limited to:

- Unwelcome sexual advances.
- Inappropriate touching or physical contact.
- Sexual jokes or comments.
- Displaying sexually explicit materials.
- Sending sexually explicit emails or messages.

Duty to Prevent Sexual Harassment

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, effective from 26 October 2024, OPP have a duty to take reasonable steps to prevent sexual harassment in the workplace. This includes:

- Implementing preventive measures such as regular training and clear communication of this policy.
- Creating a culture of respect and inclusion.
- Taking proactive steps to identify and mitigate risks of sexual harassment.

Reporting Procedure

If you experience or witness sexual harassment, you should report to the management team. Look for your job title below and follow the escalation path described:

Activity Leader – the Operations Manager, or if they unavailable, the Deputy Operations Manager. If you need to report to senior management, escalate to the Programme Manager. Reports can be made in person or via email.

Campus Lead – the Operations Manager, or if they unavailable, the Deputy Operations Manager. If you need to escalate the issue or report to senior management, escalate to the Programme Manager. Reports can be made in person or via email.

OPP Academic or Operations Staff – your Line Manager. If you need to report to senior management, escalate to the Programme Manager. Reports can be made in person or via email.

Handling Sexual Harassment Complaints

All complaints will be taken seriously and handled promptly and sensitively. If proven, we will take prompt and effective action. Any employee found to have engaged in sexual harassment may face disciplinary action up to and including dismissal. Volunteers, third party suppliers and beneficiaries may also be subject to appropriate actions.

Procedure. The process will include:

- Acknowledging receipt of the complaint
- Conducting a thorough and impartial investigation
- Keeping all parties informed of the progress
- Ensuring confidentiality as much as possible

Subject to the outcome of an investigation, we may consider a range of formal and, potentially, informal options where both the assigned case manager and the person making a complaint think this is appropriate.

Informal Action. For example, this might include:

- Explaining to the person who's been complained about why their behaviour was not acceptable and that it needs to change.
- Arranging mediation between the people involved, at the discretion of the victim.

Formal Action. A formal procedure will be followed either:

- When informal options have not or would not work or be appropriate or.
- A formal complaint is made.

Disclosure of Sensitive Communications

We will handle sensitive communications with the utmost care. This includes:

- Maintaining the confidentiality of all parties involved
- Ensuring that any sensitive information disclosed during the investigation is protected
- Following legal guidelines on privilege and disclosure to ensure that sensitive communications are only shared with those who need to know.

Supporting People in Speaking Up About Sexual Harassment

We recognise the importance of supporting individuals in speaking up about sexual harassment. We recognise that creating and maintaining an open, respectful culture is key to doing so and, to foster a safe environment for reporting, we will:

v2. 30 June 2016. Revised 13th November 2024

- **Reduce Psychological Barriers:** Acknowledge the difficulty of speaking up and provide reassurance that reports will be taken seriously and handled with sensitivity.
- **Lessen Social Threats:** Make it clear that the intention of reporting is to improve the workplace environment, not to target individuals.
- **Provide Clear Reporting Channels:** Ensure that people know how and where to report incidents, and that they can do so without fear of retaliation.
- **Offer Support and Resources:** Provide access to counselling and support services for those who report harassment.
- **Encourage a Speak-Up Culture:** Regularly communicate the importance of speaking up and, if reasonably possible, provide training on how to do so effectively.

Additional Steps for Management

We also recognise that creating an open and respectful culture is primarily the responsibility of OPP's leadership team. To further ensure a harassment-free workplace, management will:

- **Include in Policies and Training:** Ensure that our zero tolerance of sexual harassment is properly reflected in other policies, induction and on the job training.
- **Lead by Example:** Demonstrate zero tolerance for sexual harassment through their own behaviour and actions.
- **Communicate Clearly:** Communicate the importance of a harassment-free workplace and the steps being taken to ensure it.
- **Regular Training:** Conduct regular training sessions for all employees, including management, on recognising, preventing, and addressing sexual harassment.

Support for Affected Individuals

We will provide support to anyone affected by sexual harassment, including access to counselling services and adjustments to work arrangements if needed.

UK Sexual Harassment Resources

Equality and Human Rights – [Workplace Sexual Harassment Guidance](#).

RSM [Final Countdown to New Duty to Prevent Sexual Harassment](#).

Acas: [Sexual harassment](#).