



UNIVERSITY OF
LINCOLN

Bullying and Harassment Policy and Procedure

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1. Purpose

1.1 The purpose of this Policy is to:

- State the University's position on bullying, harassment and victimisation;
- Raise awareness amongst the University community of behaviour that could be considered to be bullying, harassment and victimisation (refer to Section 4 for definitions of these terms);
- Provide a supportive environment to seek early informal resolution to bullying, harassment and victimisation concerns, where practicable and reasonable to do so;
- Provide guidance on informal and formal means of dealing with bullying, harassment and victimisation, should it occur.

1.2 This Policy is designed to ensure that employees have access to a clear and systematic formal procedure by which they may raise concerns, problems or complaints relating to bullying and harassment. The aim is to ensure prompt, consistent and fair treatment for all employees, and to help both the employee and the University to be clear about their expectations of the process.

1.3 In this Policy:

- "Unacceptable behaviours" shall mean bullying, harassment and/or victimisation (refer to Section 4 for definitions of these terms);
- "Reporting Person" shall mean the person or group who make an allegation of bullying, harassment and/or victimisation;
- "Reported Person" shall mean the person or group who is the subject of allegations of bullying, harassment and/or victimisation.

1.4 The University has a duty of care to safeguard the health and wellbeing of all of its employees and aims to support a working and learning environment and culture free from all forms of unacceptable behaviours.

1.5 The University and the recognised Trade Unions agree that this Policy should not be used as a substitute for promoting and maintaining positive and productive relationships throughout the University.

1.6 The University encourages any employee, or visitor who in good faith, considers they are being subjected to unacceptable behaviours to take action using the procedures outlined in this Policy.

1.7 The University commits to take seriously and to investigate thoroughly any allegations of unacceptable behaviours that are formally brought to its attention.

2. Scope

2.1 This policy applies equally to all employees, of all levels of seniority, without exception as well as to individuals who are indirectly employed by the University e.g. agency workers and individuals employed by partner organisations whilst working with the University. This Policy also applies to visitors to the University; visitors are considered to be any person or persons who are not employees, workers, contractors or students who are legitimately on campus i.e. visiting academics, prospective students, volunteers, consultants, staff of businesses or organisations hosted by the University.

2.2 If an employee(s) considers they are being subjected to unacceptable behaviours they should raise a complaint under this Policy, as opposed to the Grievance Policy and Procedure, which is for matters relating to employment. If a visitor(s) to the University considers they are being subjected to unacceptable behaviours, they should refer to section 5.7.

2.3 Any person observing behaviour which may constitute unacceptable behaviours, should encourage the affected individual(s) to seek appropriate support and assistance as outlined in this Policy.

2.4 Complaints made by students regarding unacceptable behaviours are not covered by this Policy. Students at the University should refer to the University General Regulations relating to student conduct; further advice is available from Student Services, if required. Where the student is also an employee, advice should be sought from the PPC (People, Performance and Culture) Department, who will liaise with Secretariat in order to determine the most appropriate route for addressing the issue.

2.5 This procedure is not applicable to any complaints regarding:

- (i) nationally agreed terms and conditions, policies, practices or agreements;
- (ii) any matter which seeks to change an agreement reached with a recognised trade union, either nationally or locally;
- (iii) collective disputes that are the subject of negotiation or consultation with a recognised trade union;
- (iv) complaints about the instigation of disciplinary proceedings against an individual, action taken under the disciplinary procedure, or the operation of the disciplinary procedure, which should be dealt with under the disciplinary procedure at the same time as the alleged misconduct is being considered;
- (v) complaints about being subject to the Managing Sickness Absence Policy, or action taken under that Policy, which should be dealt with under the Managing Sickness Absence procedure;
- (vi) complaints about the instigation of the Improving Performance Policy against an individual, action taken under the Improving Performance procedure, or the operation of the Improving Performance procedure, which should be dealt with under

the Improving Performance procedure at the same time as the alleged under-performance is being considered;

(vii) a complaint against an actual or potential dismissal (for example, redundancy or end of fixed term contract), which should be dealt with under the appropriate procedure;

(viii) allegations about employment matters, which should be more appropriately managed through the University's Grievance Procedures;

(ix) allegations which are brought under the University's Whistle-blowing Procedures;

(x) employees are excluded from using this procedure to raise substantively the same complaint again following completion of the original Bullying and Harassment process, except where agreed actions have not been implemented. A complaint may be considered repetitious if it is identical, or substantially similar, to a complaint, or complaints, which have been thoroughly investigated previously.

2.6 Where a complaint raised by an employee relates to a procedure not covered by section 2.5, it will be managed using this Policy and in parallel with the other procedure, if it is deemed appropriate to do so.

3. Principles

3.1 Unacceptable behaviours have a detrimental effect on the learning and working environment and on the wellbeing of those directly affected by such behaviour or who are witness to it. The University is committed to creating a working and learning environment free from unacceptable behaviours in which all employees, students and visitors to the University are treated with consideration, dignity and respect. This Policy promotes the respectful treatment of employees and others within the University and their protection from bullying, harassment and victimisation.

3.2 The University aims to create and maintain an environment where employees feel able to raise concerns at the earliest opportunity and reduce the need for employees to initiate formal procedures. Wherever practicable and reasonable, concerns should be resolved informally (please refer to Section 10 for further information). Where it is not practicable and reasonable for a concern to be resolved informally, the formal procedure detailed below will be followed.

3.3 Anyone who believes they have been subjected to unacceptable behaviours should inform their Line Manager (or next tier manager if the Line Manager is the Reported Person) or speak to the PPC Department who can highlight support available and help them to understand what steps they may take to raise the issue informally or formally.

3.4 The University fully supports and recognises the right of individuals to raise a complaint in good faith. Any employee or visitor who has a complaint relating to unacceptable behaviours has a right to express it, receive a written response and be certain that they will not be victimised for using this procedure.

3.5 The University will not victimise or permit the victimisation of any employee who seeks advice or makes a complaint under this Policy, or any employee who represents or accompanies a colleague who has invoked the Bullying and Harassment procedure or acts as a witness. Victimisation of an individual involved in such proceedings will not be tolerated and is a form of misconduct that may result in a disciplinary process.

3.6 Allegations raised regarding unacceptable behaviours will be taken seriously. Where it is found that unacceptable behaviours have taken place, this finding may lead to disciplinary action and, in serious cases, dismissal.

3.7 The University has a duty of care to safeguard the health and well-being of its employees. If an individual appears to be at immediate risk because of alleged unacceptable behaviours, the University may have an obligation to investigate even if a formal complaint has not been lodged. This will be done within the procedures outlined in this Policy, at the discretion of the Chief People Officer.

3.8 During an investigation, the Line Manager (or next tier manager if the Line Manager is the Reported Person), in consultation with PPC, will give consideration as to whether the parties can continue to work together whilst the investigation is being carried out and where necessary, alternative precautionary arrangements will be made. Such precautionary changes to working arrangements will be for as short a time as possible and may include changes to working hours or place of work, so as to avoid or minimise contact between the Reporting and Reported Person. There is no implication of guilt or wrongdoing if such alternative precautionary arrangements are made.

3.9 In serious cases, depending on the nature of the complaint, the Line Manager (or next tier manager if the Line Manager is the Reported Person), in consultation with PPC, may need to consider suspension with full pay of the Reported Person. In cases where the Reported Person has a different Line Manager to the Reporting Person, they will also be involved in the decision. Any suspension will be for as short a time as possible and there is no implication of guilt or wrongdoing in any suspension from work.

3.10 In certain circumstances, where the Reported Person is in receipt of external funding, the University may need to notify any external funder of a research project of the ongoing investigation or disciplinary action, in line with their terms and conditions. Any such disclosures will be in accordance with the data protection principles set out in data protection legislation.

3.11 Whilst not a statutory legal framework, this Policy and Procedure are in line with ACAS guidelines on bullying and harassment.

3.12 The University will maintain the right of all employees to exercise their freedom of speech and expression, although these rights must be exercised within the law (article 10 of the European Convention on Human Rights). The right to freedom of speech must be balanced by the obligation to use that freedom responsibly and professionally and respecting other rights which employees enjoy. The University recognises bullying and 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. While employees will hold a range of views on a variety of issues, all members of the University community are expected to treat each other with respect and to ensure that the expression of personal views are not manifested in such a way that creates an environment that is intimidating, hostile, degrading, humiliating or offensive to others.

3.13 Complaints made under this Policy should be made by named individuals. Anonymous complaints may be raised through Concern Line, please refer to section 12.2 for further information, however the University cannot guarantee that anonymous complaints will be taken forward, as the anonymous nature of the allegation may prevent a fair investigation.

3.14 If, at any time, the Reporting Person wishes to withdraw their formal complaint, they must make their intentions known, in writing, to the Investigating Officer or the PPC Representative dealing with the matter. The University reserves the right to investigate the original complaint if it is considered to be in the best interests of the University and the individuals concerned, even if the Reporting Person withdraws it.

3.15 Where a former employee is cited as the Reported Person, the University cannot guarantee the complaint will be taken forward. Complaints submitted by a Reporting Person after they have left the University will be reviewed by the Chief People Officer and may be accepted, although not normally. However, the University recognises that some cases involving outgoing and former employees can raise important issues which may warrant investigation, if it is possible to do so. If a Reporting Person raises a complaint prior to leaving but the process has not yet been completed, then the University will conclude the process as best as reasonably possible by the end date of employment. A Reporting Person who leaves the University during this process will have no right of appeal against the outcome.

3.16 If the Reported Person is a third party such as a contractor or visitor, the University will consider what action would be appropriate to deal with the issues raised, see section 12.7 for further information about bullying and harassment by third parties.

4. Definition of Unacceptable Behaviours

4.1 Section 4 of this Policy defines the terms “bullying”, “harassment” and “victimisation. It is important to provide these definitions, to enable employees to make informed judgements about whether a particular type of behaviour falls within the scope of this Policy. However, the University also recognises that there can often be overlap between these different types of behaviour. If someone considers that they have experienced these unacceptable behaviours but is initially unsure of which definition is the most appropriate one, they should not be deterred from raising a complaint under this Policy.

4.2 Bullying

4.2.1 Although there is no legal definition of bullying, ACAS describe Bullying as:

- *Offensive, intimidating, malicious or insulting behaviour;*
- *An abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.*

4.2.2 Bullying is a psychological form of persecution and may occur persistently over a period of time, however, in certain situations, single incidents may constitute bullying. Bullying can also occur in less obvious scenarios and outside of traditional power relationships, e.g. an employee may be bullied by a student or a manager may be bullied by an employee. Whilst many cases of bullying occur with the intention of undermining, humiliating, degrading or injuring the recipient, it is also possible for an individual to create these effects on another person or group unintentionally. This will be taken into account in the investigation and consideration of possible sanctions.

4.2.3 Appendix 2 provides further information about bullying, including examples of behaviour that could be considered to be bullying.

4.3 Harassment

4.3.1 Harassment is 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 that individual.*

4.3.2 Harassment may take place for any number of reasons. A person may be subjected to harassment because they are perceived as being 'different to the norm' in some way or are in a less powerful position than the Reported Person. For this reason, people who are in a minority position (be it numerical or hierarchical) may be more vulnerable to being harassed. However, it is important to recognise that Harassment can occur in less obvious scenarios and outside of traditional power relationships, for example an employee could be harassed by a student, or a manager could be harassed by an employee. In addition, an individual may feel harassed even if the behaviour is not directed at them (harassment because of association) or it is directed at them but they do not have the protected characteristic, however are perceived to have it (harassment because of perception).

4.3.3 Appendix 2 provides further information about harassment and protected characteristics, including examples of behaviour that could be considered to be harassment.

4.4 Victimisation

4.4.1 Victimisation is being subjected to a detriment because someone made or supported a complaint in good faith related to a protected characteristic, intended to make such a complaint, or is believed to have made such a complaint.

4.4.2 The University seeks to protect any member of the University community from victimisation, which is a form of misconduct that may result in a disciplinary process.

4.4.3 Examples of victimisation may include labelling an individual a 'troublemaker' and/or refusing to advance them professionally, or to treat them in any way less favourably as a result of their actions.

4.4.4 A person is not protected from victimisation where they maliciously make or knowingly support an untrue complaint.

4.4.5 Victimisation is unlawful under the Equality Act 2010 and will be treated as a form of harassment under this Policy.

4.5 Reasonableness

4.5.1 On occasion, individual perceptions of behaviour may differ due, for instance, to differences in attitude, experience or culture, and what one person would consider acceptable behaviour may be unacceptable to another. The defining factor in determining whether conduct amounts to bullying or harassment is that the behaviour is unacceptable to the recipient and could 'reasonably be considered' to amount to bullying or harassment. The intention of the person engaging in the behaviour, whether or not they meant to bully or harass, is not a primary factor in determining if unacceptable behaviours have taken place.

4.5.2 When considering allegations of unacceptable behaviours, the Investigating Officer will need to apply a test of 'reasonableness' to determine if the behaviour has taken place.

4.6 Allegations of Bullying or Harassment by Line Managers

4.6.1 Managers have a right to manage and a duty to do so. Bullying or harassment should not be confused with the legitimate management of employees or the actions of a Line Manager making reasonable (if sometimes unpopular) requests that are relevant to the role. It is also distinct from techniques used to manage and improve performance which are a necessary part of the University's management processes; the distinguishing factor being that these have the effect of supporting and developing potential or promoting desired work performance, and do not, of themselves, constitute bullying or harassment.

4.6.2 Those with line management responsibilities must not abuse their authority and use it as a basis for bullying or harassment. Line Managers giving feedback should ensure that any concerns are clearly identified and addressed in an appropriate, constructive and objective way.

5. Responsibilities under this Policy

5.1 Employee Responsibilities

All employees of the University are personally responsible for their behaviour towards others, at work and at work-related events / activities, whether or not these take place on University premises or in work time. Employees should:

- Take responsibility for conducting themselves in a professional, consistent and respectful manner in line with our One Community Values.
- Through their behaviour, demonstrate an active commitment to this Policy and its aims;
- Contribute to a dignified working environment in which bullying and harassment are considered unacceptable and consider personal behaviours that might be seen as such;
- Take appropriate action as outlined in this Policy at the earliest opportunity should unacceptable behaviour arise;
- Where practicable and reasonable, seek early informal resolution to any concerns regarding bullying and harassment;
- Modify their behaviour at work if they become aware that it is unacceptable in light of this Policy, even if no informal or formal complaint has been made;
- Consider accessing support mechanisms to maintain health and wellbeing during the process.

5.2 Management Responsibilities

Line Managers are responsible for:

- Setting and modelling acceptable standards of behaviour;
- Communicating these requirements to any employee for whom they have responsibility;
- Making every effort to maintain an environment which is free from unacceptable behaviours;
- Wherever practicable and reasonable, facilitate informal resolution to employee complaints;
- Taking appropriate and prompt corrective action as outlined in this Policy or seeking advice from the PPC Department regarding how to proceed, if they are informed of behaviour which contravenes, or may contravene, this Policy;
- Modifying their behaviour at work if they become aware that it is unacceptable in light of this Policy, even if no formal or informal complaint has been made;
- Referring parties to support mechanisms to maintain health and wellbeing during the process (or consider accessing themselves if they are the Reported Person).

5.3 Responsibilities of the People, Performance and Culture (PPC) Department

The PPC Department is responsible for providing advice and information on the operation and application of this procedure at any stage and has a specific role in providing professional support during the formal stages of this procedure. A Representative of the PPC Department will be present during all formal meetings to advise the Investigating Officer with procedural guidance, and to ensure fair, consistent and appropriate management of the process. PPC will also be responsible for monitoring the number of formal cases investigated each year and the outcomes of those cases.

5.4 Responsibilities of the Investigating Officer (IO)

5.4.1 Upon receipt of the bullying and harassment complaint an independent IO is appointed by the Reporting Person's Line Manager (or the next tier Line Manager if the Line Manager is the Reported Person) and PPC. It is the IO's role to determine the outcome of the complaint and apply a test of 'reasonableness' to determine if bullying or harassment has taken place (as detailed in section 4.5). The IO will consider the level and scope of their investigative actions (which will be dependent on the nature, seriousness and sensitivities of the complaint) to ensure that they are able to respond in a fair, proportionate and efficient manner. The IO will conduct the investigation in a thorough, impartial and objective manner, and will carry out the investigation with sensitivity and due respect for the rights of all parties concerned.

5.4.2 In some instances, where the initial information submitted by the Reporting Person is unclear, the IO may need to communicate directly with the Reporting Person in advance of the Fact Finding Meeting to gain clarity; this is in order to ensure that the IO is able to respond to the complaint effectively and in a fair, proportionate and efficient manner.

5.4.3 It is important that the complaint is dealt with promptly to reduce any distress caused to all parties; therefore, the IO must complete the investigation report within a timescale agreed with the PPC Representative

5.5 Responsibilities of the Witness

Reasonable requests made by an IO of an employee to attend a Fact Finding Meeting and / or provide a statement (see Appendix 4) to assist the investigation of a case, should be met, unless there are reasonable grounds for not responding to such a request. These reasons must be given to the IO without undue delay. Witness evidence must be provided in good faith; if such evidence is found to be malicious or vexatious, it may be necessary to take subsequent disciplinary action. Anonymous statements will not be normally accepted for the purpose of this Policy, however witnesses who wish to retain anonymity will be reviewed on a case by case basis.

5.6 Responsibilities of the Trade Union Representative

The Trade Union (TU) Representative's role in the process is to support their member(s) (see Appendix 7). On occasion the TU Representative may intervene in order to seek clarification, advise the member about particular questions, or request an adjournment.

5.7 Responsibilities of Visitors

5.7.1 When visitors are officially invited to the University, it is the responsibility of their host to make them aware of the University's position on bullying and harassment, as explained in this Policy.

5.7.2 Any complaint of unacceptable behaviour will be investigated and where a complaint against a visitor is upheld, action taken may include severing links with the visitor.

5.7.3 Any visitor who feels they have experienced bullying or harassment by an employee during their visit should take action using the procedures outlined in this Policy.

5.7.4 Any visitor who feels they have experienced bullying or harassment by a student during their visit should refer to the University Student Misconduct Regulations; further advice is available from Secretariat, if required.

5.8 Responsibilities of Other Workers

5.8.1 Consultants, agency workers and contractors will be made aware of the University's Bullying and Harassment Policy by the relevant department upon appointment.

5.8.2 Any manager responsible for workers who are not directly employed by the University is responsible for making them aware of the University's position on bullying and harassment, as explained in this Policy.

5.8.3 Any consultant, agency worker or contractor who feels they have experienced bullying or harassment by an employee should take action using the procedures outlined in this policy.

5.8.4 Any consultant, agency worker or contractor who feels they have experienced bullying or harassment by a student during their visit should refer to the University Student Misconduct Regulations; further information is available from Student Services, if required.

6. Interaction with the Other University Policies

6.1 At any stage of this Bullying and Harassment Procedure, the IO dealing with the complaint and having taken advice from the PPC Department, may transfer the issue to a more appropriate Policy or Procedure either during or after an investigation, should there be sufficient evidence to support this, and if it is deemed appropriate to do so.

6.2 Interaction with the Disciplinary Policy and Vexatious Complaints

6.2.1 If, after a full investigation, a complaint of bullying and harassment is substantiated and the conduct of an employee is deemed to be a disciplinary matter, the case will be taken forward for consideration under the University's Disciplinary Policy. The investigation report, associated evidence and witness statements relating to the complaint will be shared with the Disciplinary Panel as it may be considered pertinent to (or to wholly constitute) the preliminary investigations of the Disciplinary procedure. In such cases, the employee concerned will have a right to appeal against any disciplinary warnings and decisions in accordance with the appeals mechanism within the Disciplinary Policy.

6.2.2 In terms of the general approach to be taken, the University and its employees will assume that complaints of bullying and harassment are raised in good faith and will take all complaints seriously unless there is clear and objective evidence to the contrary.

6.2.3 A vexatious complaint is one that is made solely or mainly to harass, annoy or subdue another person, or something that is unreasonable, without foundation, frivolous, repetitive, burdensome or unwarranted. Such a complaint may be made in order to slow down or frustrate another procedure that the Reporting Person is involved in (for example, an ongoing poor performance or disciplinary procedure).

6.2.4 A malicious complaint is one that is made with the intention of causing harm by seeking to defame a colleague or manager, through knowingly providing false or misleading information or withholding information about an incident or issue.

6.2.5 The University has a duty to protect its employees from complaints made in bad faith. If at any point in the investigation, the IO decides the complaint is malicious or vexatious then the complaint may be rejected without further investigation and following advice from the PPC Department, appropriate disciplinary action may be taken against the Reporting Person. A complaint made maliciously may be considered gross misconduct and could result in dismissal. The IO will meet with the individual raising the complaint prior to making any such decision, advise them that they are minded to dismiss the complaint; in such cases the Reporting Person will have the opportunity to make representations as appropriate. The IO should make a final decision based on the evidence and report this decision to the Reporting Person and to the Reported Person.

6.2.6 Should a complaint of bullying and harassment be unfounded this is not in itself a reason to conclude that it was not made in good faith. Sometimes, a complaint may prove impossible to uphold; for example if the allegation turns out to be due to a misunderstanding or is not capable of being sufficiently substantiated. No one will be treated less favourably or suffer any detriment for having raised or supported a complaint made under this Policy in good faith.

6.3 Interaction with the Grievance Policy

6.3.1 The University has a separate Grievance Policy that should be followed if the Reporting Person has concerns relating to their employment, for example relating to: the duties and associated grade of their post or their working conditions and environment.

6.3.2 Where a complaint involves concerns relating to the Reporting Person's employment, as well as allegations of bullying and harassment, the IO will review the complaint and, with advice from PPC, will determine the most appropriate policy to address the matter under. If the matter is to be addressed under the Grievance Policy, this decision will be circulated to all concerned as all relevant details, evidence and witness statements previously relating to the complaint may be considered pertinent to (or to wholly constitute) the preliminary investigations of the Grievance procedure.

6.4 Gender-Based Violence (GBV)

Please refer to the Policy on Gender-Based Violence for specific definition and guidance.

6.5 University Staff / Students Relationships Policy

Please refer to the Policy on Staff / Student Personal Relationships for specific definition and guidance.

6.8 Criminal Offences

6.8.1 Criminal offences may be reported to the police. However, a formal complaint should be lodged in order that an investigation may be undertaken by the University. Where there is an allegation of a serious criminal offence, the employee involved will normally be suspended on pay.

6.8.2 Individuals who engage in unlawful harassment may also be held personally liable for their actions and subject to prosecution under criminal law.

6.8.3 The University reserves the right to report to the police any incident which it believes may constitute a criminal offence

7. Collective Complaints

7.1 For the avoidance of doubt, collective complaints are distinct from collective disputes, which are the subject of negotiation or consultation with a recognised trade union and senior representatives of the University. Collective disputes will be heard under the procedure outlined in the Recognition Agreement.

7.2 If more than one person raises concerns about bullying or harassment from the same Reported Person, they may raise the complaint collectively, rather than on an individual basis. A group of employees may raise as a collective complaint any matter relating to bullying and harassment under this Policy. All the employees raising the collective complaint must be in agreement with this approach, be named on the complaint and state how the issue affects them personally.

7.3 Consideration will be given to how each employee would like to see the complaint resolved. Employees who raise a collective complaint will be notified individually of the outcome.

7.4 There is a right to appeal, as outlined in section 12.8. Should an appeal be raised, there will be one appeal meeting and one appeal outcome.

7.5 In all other respects the same process will be followed as outlined in this Policy.

7.6 If there is not full agreement to these principles, if the complaints do not concern the same Reported Person or if any of the employees wish their trade union to represent them on an individual basis, the complaints will be managed individually.

8. Accessibility and Support

8.1 The University is committed to complying with its obligations under the Equality Act 2010.

8.2.1 If any aspect of the bullying and harassment procedure causes an employee or their companion difficulty on account of any disability or medical condition they may have, they should raise this as soon as possible with the IO or the PPC Representative, who will arrange for any reasonable adjustments to be made.

8.2.2 Such adjustments may include extending time limits, permitting additional support in meetings or arranging meetings away from the campus. Advice may be sought from Occupational Health, if appropriate. Such information will be treated sensitively and confidentially by those who need to be aware.

8.3 A complaint under this process can be stressful for everyone involved and different individuals will respond differently to stressful situations. It is important that any member of the University community who feels they have been subject to or is accused of unacceptable behaviours can talk in confidence to someone they feel comfortable with about their concerns and options for dealing with those concerns. The University will ensure that those involved in an allegation of unacceptable behaviours will have access to appropriate support throughout all stages of this

process. There may be occasions where the process causes distress and impacts on a person's mental health. Where there are signs of this happening to anyone involved in the process, the University will consider whether the process can be adjusted in a reasonable way and the IO / PPC Representative will inform the individual's Line Manager who should signpost the individual to support available to them within the University or to their GP, if appropriate.

8.4 Employee Assistance Programme

Confidential counselling via the Employee Assistance Programme is available for any employees involved in this process. Further details can be found on the University PPC portal page.

8.5 Mental Health First Aiders (MHFA)

8.5.1 University Mental Health First Aiders (MHFA) can also be a point of contact and support for employees involved in this process. The role of a MHFA is to recognise mental ill health and help people find the support they need. They strive to achieve the University's ambitions of creating an inclusive culture, whereby attitudes and behaviours to mental ill health are not stigmatised, and employees feel able to talk about their mental health without fear of repercussion or judgement.

MHFA can:

- Understand the important factors affecting mental ill health;
- Identify the signs and symptoms for a range of mental health conditions;
- Listen non-judgmentally and hold supportive conversations;
- Signpost employees to professional help and ongoing support.

8.5.2 MHFA are not directly involved in the informal or formal procedure under this Policy.

8.5.3 Further details about MHFA and how to contact them can be found on the University PPC portal page.

8.6.1 PPC and Trade Union Representatives can also provide information for employees on the options available under this Policy and the support available.

8.6.2 Further information on wellbeing services can be found on the University PPC "Supporting Your Wellbeing" page, which includes internal and external support providers. Any employee involved in this Policy can also seek help and advice from the persons/groups listed in Appendix 3.

8.6.3 Behaviour occurring on campus that is extreme or violent should be reported immediately to Security.

9. Confidentiality and Record-Keeping

9.1 It is the University's aim to deal with matters sensitively and with due respect for the privacy of individuals involved. Confidentiality is an important part of the procedures provided under this Policy; all parties must treat any information communicated to them in connection with matters under this procedure as confidential, subject to the need to seek appropriate advice, guidance and support. Breach of confidentiality may give rise to disciplinary action under the University's Disciplinary Policy.

9.2 It is not University policy to allow audio or visual recordings of formal meetings by either party unless there are exceptional reasons why this should be considered, including those which might relate to the disclosure of a disability or relevant health condition. The decision regarding whether to allow a recording will be taken by the IO in consultation with PPC in advance of the meeting. A recording may be made only where all parties agree. If any party covertly records a meeting under this procedure, the recording will not be considered as evidence and the employee involved may be the subject of disciplinary action.

9.3 The PPC Department will keep a written record of formal meetings. The meeting notes will provide a summary of the key discussion points and are not intended to be verbatim. A copy will be provided to the employee who attended the meeting, and they will have the opportunity to comment on any factual inaccuracies and asked to confirm that the record of the meeting is accurate. Where agreement cannot be reached the individual should give written reasons for the disagreement and these should be attached to the notes. Notes of formal meetings will be kept in line with the University's Records Management Policy.

9.4 In some circumstances it may be necessary to redact documents and/or meeting notes. Redacting may happen when information is presented that is not directly relevant to the complaint or its relevant context, and which could cause offence, is inflammatory, financially or commercially sensitive, personal data and/ or otherwise confidential. Any redacting will be completed by the PPC Department in conjunction with the IO.

9.5 The Reported Person has the right to see the allegations against them in full and have the opportunity to respond. Therefore, the Reporting Person automatically gives permission for the relevant sections of the complaint to be shared with anyone named in it.

9.6 The Reported Person will normally be told the names of any witnesses whose evidence is relevant to the specific aspect of the complaint relating to them, unless the IO exceptionally and reasonably believes that a witness's identity should remain confidential. Witnesses should understand that evidence provided by them will, other than in exceptional circumstances, be provided to the Reporting Person and to the Reported Person. Any witnesses who wish to retain anonymity will be reviewed on a case by case basis.

9.7 The University will keep a written record of all complaints made under this Policy, including the investigation report; the decision and actions taken; the reason for the actions; whether an appeal was lodged; the outcome of the appeal and any subsequent developments. Records will be treated as confidential and be kept no longer than necessary in accordance with the data protection principles set out in data protection legislation. Data protection legislation also gives individuals the right to request and have access to certain personal data stored about them.

10. Informal Resolution

10.1.1 If a person believes they are being subjected to bullying or harassment in any form, they should not feel that they have to tolerate it or that it is their fault. The University's primary concern is that the bullying and harassment should stop and that there is support and assistance available to those who need it.

10.1.2 It can be challenging to deal with bullying and harassment, especially where close colleagues or managers are involved, but it is important to seek help and to do it at an early stage. Where possible, employees are encouraged not to 'store-up' issues over a prolonged period of time before raising them as this sometimes makes the task of resolving them more problematic. Where practicable and reasonable, issues should normally be raised as soon as they occur or come to light.

10.1.3 If a person believes they are being subjected to bullying or harassment, where possible, those involved are encouraged to resolve the situation informally in the first instance. The University recognises however, that in some instances it may not be reasonable and practicable to resolve issues informally, or informal attempts at resolution may be unsuccessful. In these circumstances, the Reporting Person should submit a formal complaint of bullying and harassment in accordance with the formal procedure outlined in Section 12.

10.1.4 Whichever approach is chosen (informal or formal), it is recommended that a written record of any alleged incident of bullying or harassment is made as soon as possible after it occurs. This should be dated, kept for future reference and should include:

- The name of the Reported Person;
- Details of when and where the alleged bullying or harassment took place, including dates and times;
- Details of the alleged behaviour;
- Details of the impact the alleged behaviour had upon the Reporting Person; and
- Details of any witnesses to the alleged behaviour.

10.1.5 If the Reporting Person is not certain whether an incident or series of incidents amounts to bullying or harassment, they should speak to their Line Manager for further guidance. If the Line Manager is the Reported Person, the

Reporting Person should contact the next tier manager or their PPC or Trade Union Representative for further guidance.

10.2 Informal Procedure

10.2.1 The University will support employees to resolve concerns informally wherever it is reasonable and practicable to do so. An informal approach can effectively address the unwanted behaviour without recourse to formal procedures. Sometimes people are not aware that their behaviour is unwanted and an informal discussion can lead to greater understanding and an agreement that the behaviour will cease. Informal approaches can have the advantage of resolving the situation quickly and with minimal disruption to relationships. Informal approaches may be sufficient to resolve the matter without the need for more formal means. It is however, up to the individual to decide if the informal approach is appropriate to their situation.

10.2.2 Employees at all levels of the University are encouraged to view the informal raising of unacceptable behaviours under this Policy constructively. Wellbeing and good performance/productivity can be dependent upon effective working relationships, and the fair and reasonable handling of disagreements is an important element in creating and maintaining those relationships.

10.2.3 A 'no fault' approach is strongly recommended where reasonable and practicable, by all parties when responding to matters raised under this Policy, with resolution being a shared and inclusive responsibility. Adopting a constructive attitude may facilitate a speedy and satisfactory resolution, and potentially avoid the need for the matter to be raised as a formal complaint.

10.2.4 The informal approaches that can be adopted are outlined below.

10.3 Individual Action

10.3.1 If it is practicable and reasonable to do so, the University recommends that anyone who believes they are being subjected to bullying or harassment should speak directly to those involved or, if more suitable, put their concerns in writing to them. Ideally, the Reported Person should be approached at the earliest opportunity.

10.3.2 When taking individual action, the Reporting Person should:

- Pick a time and a place where they can speak privately and without interruption;
- Clearly identify the behaviour that is causing concern, and give examples and instances of when it has occurred;
- Make it clear that the behaviour could be considered bullying or harassment under this Policy, is unwelcome and must stop immediately.

10.3.3 Advice can be sought from a number of sources prior to doing this as it may help the Reporting Person to frame the conversation and consider whether it may be possible to arrive at an acceptable solution on an informal basis. Advice can be sought from the PPC Department or a Trade Union Representative. All persons involved in an allegation of bullying or harassment can find further information about sources of support in Section 8 and Appendix 3.

10.3.4 In contrast to formal proceedings, the informal procedure is not a process which involves detailed investigation into the complaint, the making of decisions on disputed issues, or attributing blame or fault. The focus of informal resolution is to allow safe and constructive dialogue to explore whether the issues can be resolved through discussion and by agreement on ways of avoiding similar matters arising in future. This may include:

- (i) exploring and discussing the behaviour which has given rise to the issue and considering whether there have been any misunderstandings on either side;
- (ii) the Reporting Person and the Reported Person explaining their views and feelings on the issue in question to better understand each other's position;
- (iii) considering whether alternative ways of communicating or working with each other could have prevented the issue arising or might avoid similar matters arising in the future.

10.3.5 Guidance for the Reported Person who may be approached informally about their behaviour is at section 10.5 below.

10.3.6 Although this is an informal process, it is advisable that the Reporting Person and Reported Person should make a confidential summary note recording the details any discussions or correspondence, its outcome and any agreed next steps, as this may be useful in the event that further action becomes necessary. The summary note will only be shared by the Reporting or Reported Person if the matter escalates to a formal bullying and harassment complaint, or if all involved agree it would be beneficial to share the record more widely. Where informal resolution does not satisfactorily resolve the issue or if the behaviour does not stop, the Reporting Person may wish to pursue the formal process as set out in Section 12.

10.3.7 Whilst a PPC Representative will not attend meetings connected with the informal stage, PPC advice may be sought by either the Reporting Person or the Reported Person, if required.

10.4 Mediation

As a means to informal resolution the Reporting and Reported Person may wish to pursue Mediation as set out in section 11 below, if it is reasonable and practicable to do so. Where mediation does not satisfactorily resolve the issue or if the behaviour does not stop, the Reporting Person may wish to pursue the formal process as set out in section 12 below.

10.5 Guidance for the Reported Person

10.5.1 The University recognises it can be distressing to be the subject of allegations of bullying or harassment. Persons who are approached about their behaviour are advised to consider what is being said carefully. Whilst it may be upsetting, they should allow the Reporting Person to express their concerns and try to reach some common ground to remedy the situation. Even if it was not the intention to be hurtful, actions can still constitute bullying or harassment if they could reasonably be considered to have this effect. If this is the case, then behaviour will need to change. It is often helpful to seek clarification about what aspects of behaviour were felt to be unacceptable and to discuss ways of working together more effectively.

10.5.2 In many cases people may feel that there has been a misunderstanding, and that they did not intend to cause bullying or harassment. In this case the Reported Person should explain that the behaviour will not be repeated, and parties should come to an agreement regarding what is/isn't acceptable. Behaviour that some individuals find acceptable, or even friendly, may be hurtful to someone else and this should be respected.

10.5.3 Persons subject to a formal allegation of bullying or harassment should not contact the Reporting Person or any named witnesses regarding the matter, as this is unlikely to solve, and may aggravate, the situation.

10.5.4 If a person believes the allegations against them to be unfounded, they are encouraged to participate in proceedings as it is their opportunity to respond.

10.5.5 Persons who are the subject of allegations of bullying or harassment, either under the formal procedure or who are approached informally about their behaviour, can seek support and advice from PPC. Details of other sources of help and advice can be found in Section 8 and Appendix 3.

11. Mediation

11.1 Where it is reasonable and practicable to do so, mediation can be an important consideration for resolving issues and disputes at an early stage informally without resorting to formal procedures. Where appropriate, the University would encourage all parties to consider mediation or other non-adversarial discussions to take place at the earliest opportunity, preferably before formal procedures are commenced.

11.2 Mediation is a voluntary and confidential process which encourages open communication of feelings and encourages parties to deal directly with any conflict and determine the resolution. It is designed to be a positive process, as it focuses on resolving problems to move forwards, rather than trying to apportion blame.

11.3 The University may recommend mediation to try and resolve concerns, where it is appropriate to do so. Subject to the agreement of all parties involved, the procedure may be suspended at any stage for mediation or other non-adversarial discussions with the aim of expediting a resolution.

11.4 Agreement to mediation does not preclude the Reporting Person from submitting a formal complaint at a later stage if mediation is not successful in resolving the matter or if the behaviour does not stop. In such circumstances, the Reporting Person is encouraged to raise any subsequent formal complaint promptly, where possible.

11.5 Workplace mediation will be facilitated by an independent, impartial person, working with both sides to find a solution. The PPC Department reserves the right to appoint an external professional mediator in cases where it deems this is necessary. The process would seek to facilitate a mutually acceptable way forward, in a supported and confidential manner. Solutions on some issues may require an element of compromise and it must be accepted that it may not always be possible to resolve an issue to the total satisfaction of everyone involved.

11.6 Further information on mediation can be obtained from the PPC Department, if required.

12. The Formal Procedure

12.1 Submitting a Formal Complaint

12.1.1 If informal resolution is unsuccessful or if the unacceptable behaviour is significant or persistent in nature, the Reporting Person may initiate the formal procedure.

12.1.2 The purpose of the formal procedure is to provide an independent investigation into complaints of bullying or harassment, and consider, on the basis of available evidence, if unacceptable behaviour has taken place and if so, to what degree. The investigation will recommend action(s) to be taken. A formal investigation and any potential consequential disciplinary action can only take place if the complaint is investigated under the formal procedure.

12.1.3 If the Reporting Person wishes to raise a formal complaint under this Policy, they should complete and submit the Form at Appendix 4 to both the Line Manager and PPC. Where the immediate Line Manager is the Reported Person, the Reporting Person should submit it to the next tier of Management and the PPC Department as explained at Appendix 4.

12.1.4 The Bullying and Harassment Form will help the Reporting Person clearly set out the complaint, so that the matter can be responded to effectively. A key focus of this Policy is resolution, therefore it is important that the Reporting Person states how they would like the matter resolved.

12.1.5 Employees who wish to make a formal complaint about another employee may, in the first instance, seek support and guidance from their Trade Union Representative or the PPC Department.

12.1.6 Students who wish to make a formal allegation against another student should be directed to the Student Misconduct Regulations (Part P of the University General Regulations). Students who wish to make a formal allegation against an employee should be directed to the Student Complaints Regulations (Part O of the University General Regulations).

12.1.7 When the complaint is from a student and if the Reported Person is an employee, the Governance team shall inform PPC of the allegations and keep them informed throughout the process to enable PPC to decide whether and when a separate employee procedure may need to be instigated.

12.1.8 Should an employee wish to raise a complaint about bullying or harassment from a student, they should be directed to the Student Misconduct Regulations (Part P of the University General Regulations).

12.2 University of Lincoln Concern Line

12.2.1 Should employees wish to anonymously report incidences of any unacceptable behaviours they may do so through the University of Lincoln's Concern Line. The Concern Line is 24/7 and can be accessed by phoning 0333 2128056. Through Concern Line employees can discuss the incident and receive tailored support from trained counsellors.

12.2.2 As detailed in section 3.13 the University cannot guarantee that anonymous complaints will be taken forward, as the anonymous nature of the allegation may prevent a fair investigation. Where applicable, anonymous incidents reported through Concern Line will follow the process in this policy as far as reasonably possible.

12.2.3 All incidents of unacceptable behaviours that are reported through Concern Line, will be monitored and in the event of any patterns emerging, management will be advised and where appropriate, they may wish to investigate and take remedial action.

12.2.4 Further details about Concern Line can be found on the University PPC portal page.

12.3 Formal Procedure

12.3.1 Once the Bullying and Harassment Form (Appendix 4) has been received by PPC, an appropriate independent Investigation Officer (IO), will be appointed by PPC and the Line Manager of the Reporting Person (or the next tier manager, if the Line Manager is the Reported Person) to lead the next stage of the process. The IO will have no conflict of interest or prior involvement with the matters of the complaint. The IO will be supported by a Representative of the PPC Department who will provide procedural advice.

12.3.2 The PPC Department reserves the right to appoint an external investigator in cases where it deems this is necessary. This will only be done in exceptional circumstances and in consultation with the Chief People Officer.

12.3.3 To avoid any conflict of interest, if the Reporting or Reported Person has a genuine and valid reason why it would not be appropriate for the IO assigned to investigate the complaint, they must raise this at the earliest opportunity with the PPC Representative, clearly stating the reasons for their objection. Such comments will be taken into consideration in determining the appropriateness of the IO assigned. Where objections remain regarding the choice of IO, the matter should be referred to the Chief People Officer, whose decision will be final.

12.3.4 The IO's preparatory work will be to consider the details provided on the Bullying and Harassment Form (Appendix 4) by the Reporting Person, and as detailed in section 5.4.2 above, this may necessitate further communication with the Reporting Person. Dependent on the nature of the complaint i.e. the seriousness and sensitivities of the alleged unacceptable behaviours, the IO will decide the scope of their investigation, where relevant witnesses need to be interviewed and / or statements requested, and advise PPC accordingly.

12.3.5 If any "counter-claims" are received, for example where the Reported Person considers the behaviour of the Reporting Person amounts to bullying or harassment, the terms of reference for the investigation will be extended to cover these claims.

12.3.6 The method of communications regarding meetings and outcomes will be agreed individually with all parties. In the absence of agreement, the preferred method of communication will be by email to the employee's University email account.

12.3.7 Where circumstances require it, and in particular, to avoid delay, the Fact Finding Meeting(s) may be held by way of video or teleconference with the agreement of the employee concerned, the IO and the PPC Representative.

12.4 Invitation to the Fact Finding Meeting

12.4.1 The PPC Representative on behalf of the IO will send a link to this Policy to:

- a) The Reporting Person;
- b) The Reported Person;
- c) The Line Manager of the Reporting Person (or the next tier Line Manager, if the Line Manager is the Reported Person);
- d) Where applicable, any witnesses deemed relevant by the IO to be interviewed (or alternatively, requested to submit a witness statement).

12.4.2 The individuals listed in section 12.4.1 will be informed of the need to hold a Fact Finding Meeting, and the following information will also be sent to them in writing:

- The date, time, location and purpose of the Fact Finding Meeting;
- The right to be accompanied by a companion and the need to notify PPC of the name of the companion in advance of the meeting (see Appendix 7);
- The name of the IO and the PPC Representative who will be present at the meeting, and their roles;
- An outline of the alleged unacceptable behaviour; and
- Available support.

12.4.3 In addition to section 12.4.2, the information sent to the Reporting Person will include:

- Confirmation that the Reported Person will be sent the relevant sections of the Bullying and Harassment Form and potentially other information received by the IO.

12.4.4 In addition to section 12.4.2, the information sent to the Reported Person will include:

- Any relevant sections of the Bullying and Harassment Form;
- An explanation that the purpose of the meeting is to give the Reported Person an opportunity to respond to the allegations and the right to provide any other relevant information in relation to the complaint, such as their own material evidence or named witnesses to the IO to support the investigation;
- Confirmation that the Reporting Person may be sent copies of witness statement forms and potentially other information received by the IO.
- A copy of the information will also be sent to the Reported Person's Line Manager.

12.4.5 In addition to section 12.4.2, the information sent to the Line Manager of the Reporting Person and where applicable, any witnesses will include:

- The name of the Reporting and Reported Person;
- The right to provide their own material evidence or named witnesses to the IO to support the investigation;
- A request, where applicable, to complete the Witness Statement Form (see Appendix 6);
- Confirmation that the Reporting Person may be sent copies of witness statement forms and potentially other information received by the IO.

12.5 The Fact Finding Meeting

12.5.1 The purpose of the Fact Finding Meeting is for the IO to listen to the Reporting Person's concerns, establish the scope of the complaint, review the information presented, consider whether the complaint could reasonably be considered to be bullying or harassment and explore possible solutions.

12.5.2 Any meeting with the Reporting Person will be held by the IO without undue delay. PPC will be present to provide procedural advice, and an appropriate notetaker will also be in attendance.

12.5.3 At any Fact Finding Meeting, the Reporting and Reported Person will be given the opportunity to present their case at separate meetings with the IO, in a calm, fair and objective manner and state how they would like the matter resolved.

12.5.4 The IO will explain the proposed next steps and provide an estimated timescale for carrying out any investigation and responding to the Reporting and Reported Person. If there are any delays to the proposed timescales, the IO will explain how long the delay will be and why. It shall be for the IO to determine the extent of the investigation they consider necessary to respond to the complaint, including the need to interview any other employees.

12.5.5 The IO will consider the information presented, decide if the complaint is well-founded and what actions should be taken. The factors to be taken into consideration when making such a decision are:

- Whether bullying or harassment can reasonably be determined to have taken place;
- The gravity and the degree of intent of the incident(s);
- Whether there was a single incident or a series of incidents;
- Any precedents;
- Any mitigating circumstances;
- What resolution or remedies are being sought and whether they are possible or appropriate.

12.5.6 The IO may, at any point during this process, reconvene any meeting if new information has come to light and further time or information is required to consider the complaint. This will be done without undue delay and for good cause.

12.5.7 If either the Reporting Person or Reporting Person has any concerns regarding the IO's investigation at any stage of the process, they should raise them at the earliest opportunity with the PPC Representative.

12.6 After the Fact Finding Meeting

12.6.1 After the Fact Finding Meeting, the IO will, without undue delay, write a report which will summarise the nature of the alleged unacceptable behaviour, the investigation that has taken place, the decision as to whether the complaint could reasonably be considered to be bullying or harassment or not, and the reasons for that decision. The report will also detail any recommendations considered appropriate to resolve the matter or address its cause (whether or not bullying or harassment is considered to have occurred). Where recommendations are stated, the report will detail who is responsible for ensuring that any actions are complied with and reviewed at a later date.

12.6.2 Following an investigation and whether or not the complaint is upheld, consideration will be given regarding how best to manage the ongoing working relationship between the Reporting and Reported Person. If necessary, the University may consider steps such as a change of line management/working area/working hours. Other possible recommended actions may include:

- Mediation;
- Counselling;
- Training and development for either party;
- Disciplinary action to be taken under the University's Disciplinary Policy. In such cases, the Reported Person will have a right to appeal against any disciplinary warnings and decisions in accordance with the appeals mechanism within the Disciplinary Policy.
- The IO may also find there is no case to answer and recommend that no action be taken.

12.6.3 The outcome of the complaint will be communicated by the PPC Department who will send the Reporting Person a copy of the IO's report. The University reserves the right to redact any sections or recommendations from the report that are not relevant to the Reporting Person. If the complaint is not upheld, or upheld only in part, the Reporting Person will be advised of the right to appeal the decision under the next stage of the Bullying and Harassment Procedure.

12.6.4 The relevant sections and recommendations from the report will be sent to the Line Manager of the Reporting Person (or next tier manager should the Line Manager be the Reported Person).

12.6.5 The relevant sections and recommendations of the report will be provided to the Reported Person and their Line Manager.

12.6.6 Where appropriate, the Line Manager (or next tier manager) and the PPC Representative will meet with the Reporting and Reported Person separately to discuss the outcome and any agreed actions in a formal outcome meeting. PPC will keep a record of any outcome meeting and the agreed actions, in line with the University's Records Management Policy.

12.6.7 If the complaint is not upheld, the Reported Person should be reassured that their behaviour was not deemed to be inappropriate. They should be supported to recognise that the Reporting Person may still perceive the behaviours were inappropriate and that therefore the Reporting Person was not acting unreasonably in raising a concern, unless there is evidence to suggest the complaint was not raised in good faith.

12.7 Employees Who Experience Third Party Bullying or Harassment

12.7.1 In this section of the Policy the term “third party” is taken to mean the actual source i.e. the contractor, company, supplier or form of the individual(s) who represent that third party company and against whom the allegation of bullying and harassment has been made.

12.7.2 The University reserves the right to move to any step of the following procedure and take the necessary actions to protect and support its employees.

12.7.3 Should an employee experience any form of bullying or harassment from a third party e.g. a contract worker or supplier it should be reported directly to the employee’s Line Manager.

12.7.4 It is the Line Manager’s responsibility to seek to resolve directly with that third party that nature of the unacceptable behaviours.

12.7.5 If the Line Manager does not hold the contractual arrangements with that third party, then the Line Manager should report the incident to the appropriate manager who does and pass on the responsibility to address the matter with the third party.

12.7.6 It is the Line Manager’s responsibility to draw the third party’s attention to this Policy and request that the unacceptable behaviour stop immediately.

12.7.7 At this stage of the procedure, the Line Manager and employee are advised to keep a personal written record of any action they have taken in respect of the complaint.

12.7.8 After this course of action, if the third party’s unacceptable behaviour should persist against the employee, then the Line Manager will need to raise a formal complaint to the third party. The formal complaint to the third party must provide the following information:

- Name of the Reporting and Reported Person;
- Nature of the alleged bullying or harassment;
- Date and time of incident(s);
- Names of any witnesses to the incident(s);
- Details of any action already taken.

12.7.9 The formal complaint should also make it clear that if such unacceptable behaviour continues then sanctions will be taken which may include links between the worker or organisation and the University to be severed, as appropriate. The third party should be asked to make a response outlining what steps they will take to resolve the matter.

12.7.10 If the Line Manager should feel that the third party has responded appropriately and is satisfied with the redeeming course of action taken by the third party then this information should be shared with the employee concerned and the matter should be drawn to a close.

12.7.11 If the employee has any remaining concerns after the Line Manager has drawn the matter to a close, they should raise them with the next tier manager.

12.8 The Appeal Process

12.8.1 The Reporting Person has a right of appeal in relation to the process used and the decision reached. The purpose of the appeal hearing is not to rehear the case but to ensure that the original decision was reached in a procedurally correct way and the action taken was reasonable, and to consider the proportionality of any penalty to the offence.

12.8.2 An appeal can be submitted in writing using the Appeal Form at Appendix 5 to PPC. This must be done within 10 working days from receipt of the decision by the Reporting Person, as detailed in section 12.6.3 above. The Reporting Person should clearly set out their grounds for appeal and in the event this is not specified, the Reporting Person will be asked to provide this detail.

12.8.3 An appeal will be heard without undue delay by an independent IO who has not been previously involved in the matter.

12.8.4 PPC will write to all concerned notifying them of the time and date of the hearing. The Appeal Process will be the same as that detailed in the Disciplinary procedure.

12.8.5 The outcome of the appeal will be communicated in writing by PPC, without undue delay to the employee and their Line Manager (or next tier manager should the Line Manager be the Reported Person).

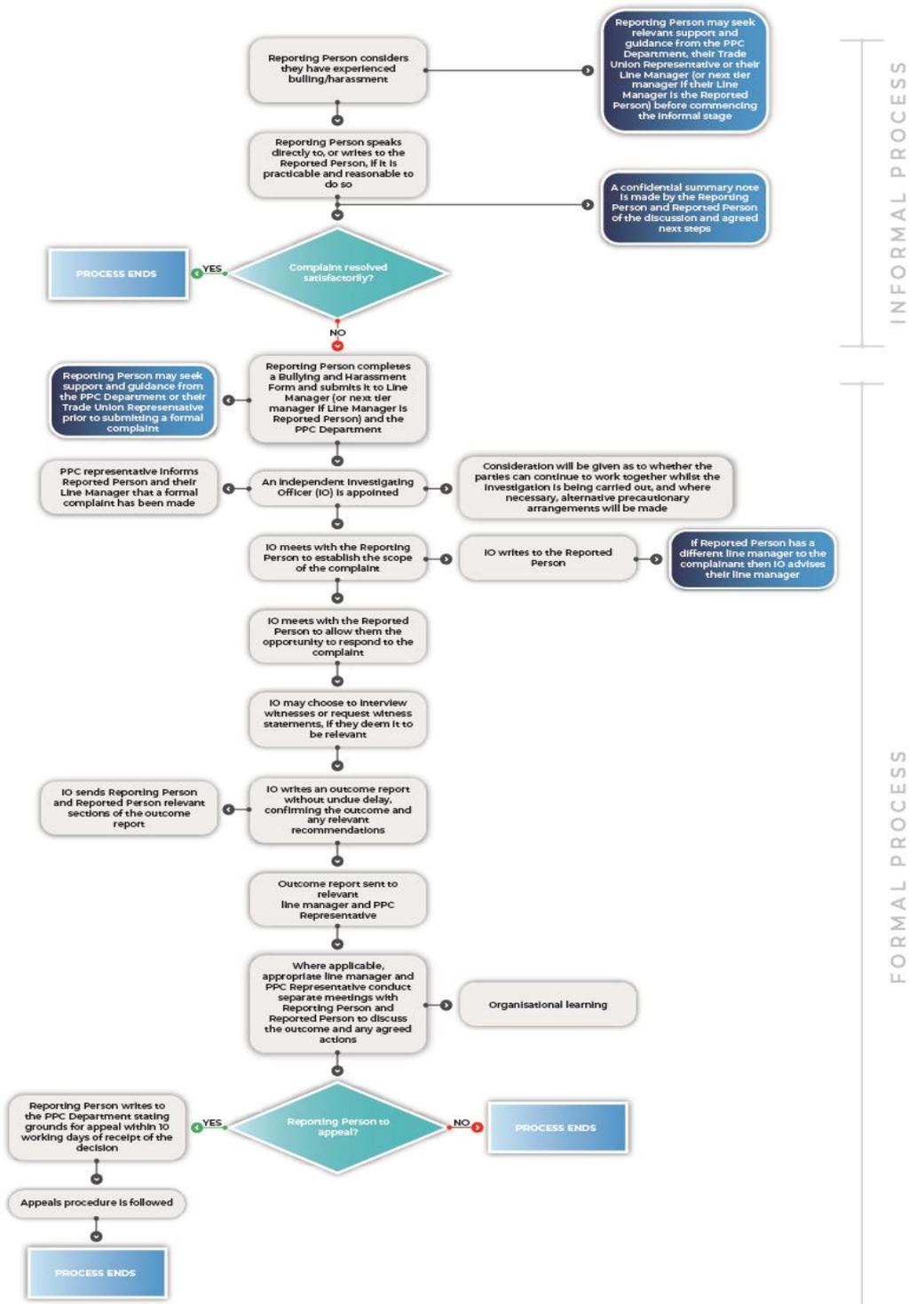
12.8.6 The outcome of the appeal is final and there are no further stages to the Bullying and Harassment Procedure.

13. Appendix 1

Bullying and Harassment Procedure Flowchart



BULLYING & HARASSMENT



14. Appendix 2

Examples of Unacceptable Behaviour

1. Introduction

1.1 Unacceptable behaviours are defined in Section 4 of this Policy, however further information and examples of what the University considers to be unacceptable behaviour can be found below.

1.2 One minor incident may be viewed as bullying or harassment. If the employee concerned did not intend to bully or harass and was unaware that they were causing offence, they need to be made aware that their actions and / or behaviour is unacceptable.

1.3 Where an employee knew or should know of the implications of their actions and / or behaviour then one proven minor incident may be sufficient for the University's disciplinary procedure to be invoked.

1.4 Threatened or actual violence, threats of dismissal or promises of special treatment in return for sexual favours, are further examples of where one proven incident may be sufficient for the University's disciplinary procedure to be invoked.

2. Bullying

2.1 Examples of behaviours that may constitute bullying include:

- Ridiculing a person;
- Shouting or screaming at a person;
- Making someone feel frightened, less respected, made fun of or upset;
- Setting someone up to fail e.g. withholding necessary information;
- Criticising an individual in an inappropriate manner or belittling them about their work, personality or appearance;
- Persistently 'singling out' a person without good reason or deliberately excluding, ostracising, isolating or ignoring an individual;
- Making threats or comments about job security;
- Persistently ignoring or 'talking down' to an individual;
- Pressurising an individual into behaviour or actions against their wishes.

2.2 The above examples are not exhaustive. They are, however, indicative of behaviour that would be considered unacceptable conduct by the University.

3. Harassment

3.1 Harassment is when bullying or unwanted behaviour is about any of the following protected characteristics under the Equality Act (2010):

- Age
- Disability
- Gender Reassignment*
- Race (including colour, nationality, ethnic and national origin)
- Religion or Belief
- Sex
- Sexual Orientation

Harassment related to these characteristics is unlawful under the Equality Act 2010.

* The University's policies, practices and procedures specifically extend to protect and support employees with gender diverse identities from harassment, such as trans, non-binary, intersex and gender non-conforming people.

3.2 The law on harassment does not cover the protected characteristics of:

- Marriage or Civil Partnership
- Pregnancy and Maternity

If someone experiences worse treatment because of having one of these protected characteristics it could be classed as discrimination.

3.3 Behaviour that might constitute Harassment

3.3.1 Any behaviour that is unwanted and could reasonably be considered as violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them is potentially harassment. Typically, for behaviour to be considered harassment, it must be persistent and continue or develop over a period of time. However, a one-off incident that is particularly serious can in itself constitute harassment.

3.3.2 Harassment can be communicated verbally, be physical in nature, or be expressed through other means of communication, such as letters, emails, text messages and graffiti. It may be expressed directly to the Reporting Person, occur in their presence or be communicated about them to another person. Often harassment is targeted at a particular individual, however, a prevailing workplace or learning culture, where, for example, the telling of racist jokes or homophobic comments is tolerated, can also constitute harassment.

3.3.3 Behaviour amounting to harassment may include:

- Insults, name-calling and offensive language and gestures;
- Inappropriate jokes including racist, sexist, homophobic, biphobic, transphobic, ablist or ageist jokes, or derogatory or stereotypical remarks about a particular cultural, ethnic or religious group or gender;
- Ridiculing and undermining behaviour;
- Inappropriate or unnecessary physical contact;
- Physical assault or threats of physical assault;
- Intimidating, coercive or threatening actions and behaviour;
- Unwelcome sexual advances;
- Isolation, non-cooperation or deliberate exclusion;
- Inappropriate comments about a person's appearance, intrusive questions or comments about a person's private life and malicious gossip;
- Outing or threatening to out someone as gay, lesbian, bi or trans;
- Offensive images and literature;
- Pestering, spying or stalking.

These examples are not intended to be exhaustive. They are, however, indicative of behaviours that would be considered unacceptable by the University.

3.3.4 Harassment related to age, disability, gender reassignment, race, religion or belief, sex (including sexual harassment) and sexual orientation is unlawful.

The following section describes these forms of harassment in greater detail and provides examples of how such harassment may be manifested. Again, these examples are not intended to be exhaustive. They are, however, indicative of conduct that would be considered unacceptable by the University:

3.4 Racial Harassment

3.4.1 Racial harassment is unwanted conduct related to a person's race, including their ethnic, cultural or national origins. It is usually, although not exclusively, directed at individuals from minority ethnic groups.

3.4.2 Specific manifestations of racial harassment may include:

- derogatory name-calling
- racist insults and threats
- racist jokes, banter and language
- ridicule of an individual or group for racial, ethnic or cultural differences
- racist graffiti, images or insignia
- microaggressions including asking persistent questions such as where a person is really from
- making persistent comments about appearance, command of language or stereotypical assumptions based on race
- not using the individual's name or adopting a nickname

- deliberately excluding or refusing to cooperate with someone because of their race
- conduct that focuses upon a person's appearance, dress, culture, language or customs
- behaviour that has the effect of fostering hatred and/or prejudice towards individuals of particular racial, ethnic or cultural groups

3.4.3 Racial harassment is unlawful under the Equality Act 2010.

3.5 Sexual Harassment

3.5.1 Sexual harassment is unwanted or uninvited conduct by someone, regardless of their gender, that is sexual in nature. Conduct that would amount to sexual harassment includes:

- Unnecessary and unwelcome physical contact, ranging from invasion of personal space, inappropriate touching or sexual assault
- Intrusive questions and remarks about a person's private life
- Inappropriate remarks about a person's appearance or dress
- Sexually explicit language, jokes, verbal and physical innuendo
- Display or circulation of sexually explicit materials
- Coercive demands for sexual favours, (such as promotion or academic success depending on the response to the demand)
- Intrusion by pestering, spying or stalking
- Persistent, unwanted advances, (e.g. inviting a colleague or friend out would not in itself amount to harassment, however, if it was indicated that the approach was unwelcome and the individual persisted in making such approaches, this is likely to be considered harassment by the recipient).

3.5.2 Sexual harassment is unlawful under the Equality Act 2010.

3.6 Harassment related to Sex

Harassment related to sex describes unwanted conduct that is directed at a person because of their gender. For example, to deliberately exclude someone because they are the only man or woman in a team, group or class would be considered sex harassment. Harassment related to sex is distinct from sexual harassment as, whilst the behaviour relates to a person's sex, it is not sexual in nature. Harassment related to sex is unlawful under the Equality Act 2010.

3.7 Harassment related to Disability

3.7.1 Harassment related to disability is unwanted conduct directed at a person because of their physical or mental disability. It may relate to the disability itself or the person's real or presumed capabilities. A person can also be harassed on the grounds of disability where they themselves are not disabled - for example, if they are the carer of a child with disabilities and suffer harassment on that basis.

3.7.2 Specific examples of disability-related harassment include

- direct verbal abuse or comments that make a disabled person feel uncomfortable, intimidated or degraded
- comments which fail to acknowledge an employee's disability
- physical abuse
- jokes or banter relating a disabled person
- mimicking or teasing a person about their disability
- deliberately ignoring a disabled person
- deliberately altering physical space or removing equipment required by a disabled person
- unnecessarily intrusive and inappropriate questions about a person's condition
- excessive and unnecessary references to a person's disability
- refusal to work alongside a disabled person

3.7.3 Harassment related to disability is unlawful under the Equality Act 2010.

3.8. Harassment related to Religion or Belief

3.8.1 Harassment related to religion or belief is unwanted conduct directed at a person because of their religion, a lack thereof, or a comparable belief system. It can also occur because a person is presumed to be of a particular religion or belief, even if this is not the case, or because of a person's nonadherence to a religion or belief system.

3.8.2 Harassment may take the form of:

- teasing or ridiculing someone for holding a particular religion or belief
- persistently asking an individual intrusive questions about how they choose to observe their religion or belief
- ostracising someone because of their religion or belief
- failing to respect the religion or belief of another (i.e. by persistently offering inappropriate food and drink)
- persistent criticism of employee for not wearing appropriate uniform or dress
- behaviour may focus upon a particular aspect of a religion or belief system, such as clothing, religious artefacts, beliefs and rituals
- the expression of stereotyped perceptions and assumptions about a religion or belief and its followers
- coercive pressure to convert or conform to a religion or belief system

3.8.3 Harassment related to religion or belief is unlawful under the Equality Act 2010.

3.9. Harassment related to Sexual Orientation

3.9.1 Harassment related to sexual orientation is unwanted conduct directed at a person because of their actual or perceived sexual orientation. It most frequently affects individuals who are gay, lesbian or bisexual, but can sometimes be directed at heterosexuals too. Harassment may be because of the actual or perceived sexual orientation of those with whom they associate. Harassment related to sexual orientation may go unreported because a person does not wish to disclose their sexuality.

3.9.2 Harassment related to sexual orientation may be specifically manifested as:

- making suggestive or unwelcome comments or gestures emphasising the actual or perceived sexual orientation of an individual or group
- engaging in homophobic or biphobic behaviour
- using homophobic or biphobic language
- displaying homophobic or biphobic materials
- making homophobic or biphobic insults or threats
- engaging in banter or making jokes which are degrading to a person's actual or perceived sexual orientation
- ignoring or excluding an individual from activities because of their actual or perceived sexuality
- spreading rumours or gossip about an individual's actual or perceived sexual orientation
- outing an individual without their permission
- asking an individual intrusive questions about their private life
- making assumptions and judgments about someone based on their actual or perceived sexual orientation
- verbally or physically abusing or intimidating someone because of their actual or perceived sexual orientation

3.9.3 Harassment related to sexual orientation is unlawful under the Equality Act 2010.

3.10. Harassment related to Gender Reassignment

3.10.1 Harassment related to gender identity is defined as being unwanted conduct directed at a person whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth (for example, someone who is transgender or non-binary). This includes individuals who are undergoing, have undergone or plan to undergo a gender reassignment process (or part of a process) for the purpose of reassigning the person's sex by changing the physiological or other attributes of sex.

3.10.2 Specific examples of such harassment may include:

- refusing to address a trans or gender-diverse person by their preferred name and correct gender pronouns
- repeated and deliberate mis-gendering of a trans or gender-diverse person or people
- engaging in discriminatory banter or making transphobic or disparaging comments, taunts or jokes
- outing an individual as trans or gender-diverse without their permission or spreading rumours or gossip about their gender identity, expression and/or history
- ignoring or excluding an individual from activities because of their trans or gender-diverse identity
- asking a trans or gender-diverse person intrusive questions about their private life
- making assumptions and judgements about someone based on their gender identity, expression and/or history
- refusing to work with someone because of their gender identity
- verbally or physically abusing or intimidating someone because they are trans or gender-diverse

3.10.3 Harassment related to gender reassignment is unlawful under the Equality Act 2010. However, the University's policies, practices and procedures specifically extend to protect and support employees with gender diverse** identities from harassment, such as trans, non-binary, intersex and gender non-conforming people.

** Gender diversity is an umbrella term that is used to describe gender identities that demonstrate a diversity of expression beyond the binary framework.

3.11. Harassment related to Age

3.11.1 Harassment related to age is unwanted conduct related to a person's real or perceived age. Specific examples of age-related harassment may include:

- direct verbal abuse or comments about age that make a person feel uncomfortable, intimidated or degraded
- unjustified exclusion of a person because of their age
- ageist jokes
- using inappropriate language and name-calling relating to a person's age or comments about their presumed abilities related to age
- making assumptions and judgements about a person's capabilities based on their age

3.11.2 Harassment related to age is unlawful under the Equality Act 2010.

3.12 Bullying or Harassment via Electronic Media, including the use of Social Media

3.12.1 Bullying or harassment through electronic and social media (social channels such as Facebook, Twitter, Blogs, Wikis, forums, email, text message etc.) is not acceptable. In sending emails consideration should be given to the content, language and appropriateness of such communications.

3.12.2 The following are some examples of what might constitute this form of bullying or harassment:

- pages that identify and shame individuals;
- images altered to degrade individuals;
- photos or videos of physical bullying posted to shame the victim;
- sharing personal information to blackmail or harass people;
- repeatedly targeting other people with unwanted friend requests or messages;
- non-consensual sharing of sexually explicit photographs.

3.12.3 Language should be avoided which would be deemed to be offensive to others in a face-to-face setting, as the impact on an individual may be much the same.

3.12.4 If allegations of online bullying or harassment are reported they will be dealt with in the same way as if they had taken place in a face-to-face setting.

3.12.5 For further information please refer to the University's ICT Acceptable Use Policy and Digital Communication Protocols.

3.13 Hate Incidents / Crimes

3.13.1 The University considers a hate incident to be any incident which is perceived by the victim, or any other person to be motivated by hostility or prejudice based on a person's:

- disability or perceived disability;
- race or perceived race;
- religion or perceived religion;
- sexual orientation or perceived sexual orientation;
- transgender identity or perceived transgender identity.

This can give rise to an environment in which people experience or could reasonably fear, harassment, intimidation or violence.

3.13.2 Following investigation and consideration of the evidence, where an incident is found to be motivated by hostility or prejudice, the University will consider this to be a hate incident and treat this as an aggravating factor in considering any appropriate action to take.

3.13.3 Hate incidents can take many forms, and be perpetrated by either an individual or group, including:

- physical attacks, such as physical assault, damage to property, offensive graffiti, neighbour disputes and arson;
- threat of attack, including offensive letters, abusive or obscene telephone calls and other intimidating behaviour;
- verbal abuse or insults, or abusive gestures;
- other abuse, such as offensive leaflets and posters, unfounded and malicious complaints and bullying.

3.13.4 Hate incidents are unlawful, and incidents of alleged hate incidents will be treated as a form of harassment under this Policy. Hate incidents may also constitute a criminal offence and consideration should be given to reporting such matters to the police. See section 6.8 for further information about criminal offences.

15. Appendix 3

Further Sources of Help and Support

The groups/people below will also be able to offer support, help and advice to any person involved in this procedure, if required.

Service	Contact Details
Concern Line	Visit: Concern Line
Employee Assistance Programme	Visit: Employee Assistance Programme
Occupational Health	Visit: Occupational Health
Mental Health First Aiders	Visit: Mental Health First Aiders
PPC Department	Visit: People, Performance and Culture
Line Manager / next tier manager	
Union Representative	
Campus Security	01522 88 6671

Students in need of support should contact Student Wellbeing or Student Support.

External Services

The lists of useful contacts given below is correct at the time of writing. Please check the web for up-to-date contact information. Please note that the University does not endorse or take responsibility for the information provided by external organisations.

Equality and Human Rights Commission is the statutory body responsible for protecting, enforcing and promoting equality across the protected characteristics www.equalityhumanrights.com.

Equality Challenge Unit provides advice and support for students and employees on equality and diversity in higher education www.ecu.ac.uk/guidance-resources/inclusive-environment/

Specialist Services

Bullying UK, part of Family Lives is a leading charity providing advice and support to anyone affected by bullying www.bullying.co.uk

National Bullying Helpline provides help and advice related to bullying or harassment at work www.nationalbullyinghelpline.co.uk

Samaritans provides free confidential emotional support 24/7 to those experiencing despair, distress or suicidal feelings. Call: 116 123 or email: jo@samaritans.org

Victim Support provides free confidential support to those affected by crime including harassment. Call for free on 0808 1689111 or request support online via www.victimsupport.org.uk



16. Appendix 4

Bullying and Harassment Form

To be completed by the Reporting Person and sent to the Line Manager* and Department of PPC. Please ensure you have read the Bullying and Harassment Policy and Procedure before completing this form.

This form should contain all relevant facts and circumstances that will enable the complaint to be investigated fully. The information provided should be clear and concise so the Investigating Officer hearing the complaint can articulate the key concerns. If there are several elements to your complaint, you should use separate headings to address these points.

Please note that the Bullying and Harassment procedure cannot be initiated unless this form is complete. If you have any queries about completing this form, please contact the PPC Department or your Trade Union Representative.

Name		College / Directorate	
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DESCRIPTION OF COMPLAINT: Please answer the questions as outlined below as this will help the Investigating Officer to deal with your complaint more effectively.

Please provide a description of what has occurred to make you raise this complaint, including the name of the Reported Person

Please provide the date(s) and time(s) the alleged incident(s) occurred

Please explain what action, if any, you took in response to the alleged incident(s)

If practical and reasonable to do so, please explain what steps, you have taken to resolve the alleged incident(s) informally

Please outline how you would like your complaint to be resolved

SUPPORTING WITNESSES AND EVIDENCE: Relevant and up-to-date evidence should be included where applicable.

If relevant, please provide the names of any witnesses to the specific alleged incident(s) and why you consider them to be relevant to your complaint:

Witness Name	Why they are a relevant witness

Please provide a list of any materials you would like to submit as evidence in support of your complaint i.e. emails, contract clauses etc. and why you consider it relevant.

Item	Why it is relevant to your complaint

*If your Line Manager is the Reported Person, send the form to the next tier of your line management and the Department of PPC.

I provide this information in good faith and I am aware that the content will be discussed with relevant people connected to this complaint.

Electronic Signature / Name		Date	
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17. Appendix 5

Bullying and Harassment Appeal Form

To be completed by the Reporting Person and sent to the Line Manager* and Department of PPC. Please ensure you have read the Bullying and Harassment Policy and Procedure before completing this form.

This form should contain all relevant facts and information that will enable the appeal to be investigated fully.

Please note that the appeal procedure cannot be initiated unless this form is complete. If you have any queries about completing this form, please contact the PPC Department or your Trade Union Representative.

Please note that the time for lodging an appeal is 10 working days from receipt of the bullying and harassment decision.

Name		College / Directorate	
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GROUNDS FOR APPEAL:

Please indicate on which grounds you are appealing	
The original decision was not reached in a procedurally correct way	<input type="checkbox"/>
The action taken was not reasonable	<input type="checkbox"/>
The penalty was not proportional to the offence	<input type="checkbox"/>

Please provide a detailed explanation regarding the basis for your appeal

--

Please outline how you would like your appeal to be resolved

--

*If your Line Manager is the Reported Person, send the form to the next tier of your line management and the Department of PPC.

I provide this information in good faith and I am aware that the content will be discussed with relevant people connected to this appeal.

Electronic Signature / Name		Date	
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18. Appendix 6

Bullying and Harassment Witness Statement Form

To be completed by the witness and sent to the Department of PPC. Please ensure you have read the Bullying and Harassment Policy and Procedure before completing this form.

If you have any queries about completing this form, please contact the PPC Department or your Trade Union Representative.

Name		College / Directorate	
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The Department of PPC will have provided you with an outline of the complaint you have been named as a witness in. Please answer the questions as outlined below as this will help the Investigating Officer to deal with the complaint more effectively.

Please provide a description of what you saw or heard, or how you are involved with the complaint

--

Please provide the date(s) and time(s) the alleged incident(s) occurred

--

Please explain what action, if any, you took in response to the alleged incident(s)

--

SUPPORTING EVIDENCE: Please provide any evidence, where applicable, in support of your statement and why you consider it relevant.

Item	Why it is relevant to your statement

I provide this information in good faith and I am aware that the content will be discussed with relevant people connected to this complaint.

Electronic Signature / Name		Date	
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19. Appendix 7

The role of the Companion under this Policy

Under the formal procedure for dealing with allegations of bullying and harassment, the companion may be a Trade Union Representative or work colleague. The employee must notify PPC of the name of the chosen companion in advance of the first meeting. It is not reasonable for the employee to insist on being accompanied by a colleague whose presence would prejudice the meeting or who might have a conflict of interest.

The role of the companion is to assist and support the employee by putting forward the employee's case or summarising it at the end. They may also ask questions to clarify understanding of the situation and ask to confer with the employee outside the room with the employee's agreement about any pertinent matters. However, a companion cannot answer questions on behalf of the employee where questions are directed at the employee. They cannot address the hearing if the employee does not want them to, or prevent the employer from explaining their case, nor can they prevent any other person at the hearing from making a contribution.

Colleagues who do not wish to accept an invitation to act as a companion are not obliged to do so.

Companions may attend meetings during working hours without loss of pay and will be given reasonable time to familiarise themselves with the matter and confer with the employee both before and after meetings.

Employees are responsible for ensuring their companions are willing to support them and attend meetings.

Employees may not appoint a legal representative or anyone external to the University, other than a recognised TU official, to act as a companion.

Where a companion is a witness (or is otherwise involved, or is potentially involved) in the investigation, the employee should be advised of the need to select a different companion in order to avoid any suggestion of collusion or conflict of interest.

20. Appendix 8

Inability to attend a Fact Finding or Appeal Meeting

The University is committed to completing the Bullying and Harassment process promptly and without undue delay, so that employees are confident that issues will be dealt with in a timely manner. It expects all employees involved in the process to abide by this principle. The University therefore expects that attendance at a Fact Finding or Appeal Meeting should normally take precedence over other commitments.

An employee who cannot attend a meeting should inform the IO or the relevant PPC Representative in advance whenever possible, and another date will be set. Pre-arranged annual leave periods will be respected in this process.

If an employee cannot attend a re-arranged Fact Finding or Appeal Meeting within a reasonable period of time, and with reasonable justification, the meeting will be held in their absence based on the available evidence. Where they have chosen to be accompanied the companion will be invited to attend on their behalf and / or the employee may wish to send a written submission.

If an employee's companion cannot attend on a proposed date, the employee can suggest another date so long as it is reasonable and is not more than 5 working days after the date originally proposed. If this cannot be done, then the University may ask that another companion is chosen instead. In exceptional cases or due to the complexity of the case, this 5-day time limit may be extended by agreement with the University.

Employees taking a period of sick leave during an investigation can be invited to participate in formal meetings, however individual circumstances will be taken into consideration at the time and advice may be sought from Occupational Health and/or the employee's GP on a case-by-case basis. In discussion with the employee, consideration will be given to the most appropriate location to hold any meetings during this time.

A decision may be taken in the employee's absence based on the available evidence if they fail to attend the re-arranged meeting and cause undue delay, without reasonable justification.

Bullying and Harassment Policy and Procedure

Owner	Last Reviewed
Operations	May 2023



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