

**BOARD OF TRUSTEES**  
**26 June 2025**



<b>Report on Bullying and Harassment 1 June 2024 to 31 May 2025</b>	<b>Agenda No: 16</b>
<b>Purpose:</b> For approval	
<b>Recommendation(s):</b> The Board is asked to review and approve the ICR's annual report on Bullying and Harassment.	
<b>Executive Summary of Paper:</b>  <p>This is the second Bullying and Harassment Annual Report to be written. It covers the period 1 June 2024 to 31 May 2025. It provides data on the number of formal complaints made to Human Resources in respect of bullying and harassment, as well as the number of reports made, anonymously or from a named employee, via the Report + Support platform.</p> <p>Section 2. Differentiates between three types of concerns: public interest (whistleblowing), grievances, and complaints related to bullying and harassment. Unlike many employers who combine grievances and bullying/harassment complaints under a single grievance policy, the ICR has chosen a different approach. Based on recommendations from our legal advisers, the ICR maintains two separate policies. However, the procedures for addressing these issues are largely similar.</p> <p>Section 3. Data on grievances has been excluded because the ICR's Grievance Policy addresses complaints unrelated to bullying and harassment. It is important to note that no grievances were reported during the reporting period, meaning there were no complaints outside of bullying and harassment.</p> <p>Section 4. Highlights the routes via which staff and students may raise concerns.</p> <p>Section 5. Provides further information on the amendment to the Equality Act 2010, The Worker Protection Act (2024), which imposes a legal duty on employers to take "reasonable steps" to prevent sexual harassment of their employees and create a safe working environment</p> <p>Section 6 summarise the actions taken to tackle concerns about inappropriate behaviour and to promote awareness of the routes for raising concerns, and further actions scheduled.</p> <p>Section 7. Outlines further planned actions to be implemented.</p> <p>Section 8. Highlights some further suggestions for consideration.</p>	
<b>Related Risk, Strategy, KPI:</b> Failure to meet the new legal duty to take proactive steps to prevent sexual harassment in the workplace. Negative perception by staff of managers for failure to act or take complaints seriously. Negative PR should staff or students post on social media, such as LinkedIn, Glassdoor, that they had a poor experience whilst working here.	
<b>Implications:</b> <p>Potential Whistleblowing complaint if we fail to meet our legal obligations. Increased turnover, low morale, inability to attract staff, due to poor PR. Potential of a Tribunal claim of bullying, harassment, sexual harassment, and a consequential claim that the ICR failed to meet its duty to prevent sexual harassment in the workplace, with associated high cost of litigation including settlement in or out of court.</p>	
<b>Committees and other Stakeholders consulted:</b> <p>Chief People Officer, Deputy Director, Learning and Organisational Development, EDC&amp;I Manager, Executive Board, Audit &amp; Risk Committee</p>	
<b>Further Approval required:</b> No	
<b>Equality Impact Assessment:</b> Not applicable	
<b>Author:</b> Jacqui Bailie, Deputy Director, HR Operations	
<b>Approver:</b> Carol Ford, Chief People Officer	

## Annual Statement on Bullying and Harassment 1 June 2024 to 31 May 2025

### Section 1: Key contact information

1A. Name of organisation	The Institute of Cancer Research
1B. Type of organisation	Higher Education Institution
1C. Date statement approved by Executive Board	
1D. Web address of organisation's bullying and harassment page (if applicable)	<a href="https://www.icr.ac.uk/about-us/strategy-2022-27/equality-and-diversity">https://www.icr.ac.uk/about-us/strategy-2022-27/equality-and-diversity</a> (see Support for staff and students/Bullying and harassment)
1E. Named senior member of staff to oversee matters relating to workplace bullying and harassment	Name: Carol Ford, Chief People Officer
	Email address: <a href="mailto:carol.ford@icr.ac.uk">carol.ford@icr.ac.uk</a>
1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters relating to workplace bullying and harassment	Name: Jacqui Bailie, Deputy Director, HR Operations
	Email address: <a href="mailto:jacqui.bailie@icr.ac.uk">jacqui.bailie@icr.ac.uk</a>

### Section 2: Different types of concerns

#### Whistleblowing

Raising a concern about an organisation's behaviour, rather than an individual's treatment, is considered whistleblowing. The whistleblower acts as a witness, not a complainant, and the concern must be in the public interest. Whistleblowing complaints are handled under the Whistleblowing Policy.

#### Grievance

Typically, a grievance arises when an employee believes their statutory or contractual rights at work have been violated, or they feel they are being treated unfairly. Complaints specifically about bullying and/or harassment are considered grievances of a particular nature. Grievances unrelated to bullying and harassment are managed under the Grievance Policy. The ICR has a separate procedure to handling complaints related to alleged bullying or harassment.

#### Bullying and harassment, including sexual misconduct

There is no legal definition of bullying, however it can be described as unwanted behaviour from a person or group that is either:

- offensive, intimidating, malicious or insulting
- an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone

Harassment is defined as unwanted conduct related to a protected characteristic, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading,

humiliating, or offensive environment. Less favourable treatment can be anything that puts someone with a protected characteristic at a disadvantage, compared to someone who does not have that characteristic. Sexual harassment is unwanted behaviour of a sexual nature, but it does not need to be related to a protected characteristic.

Sexual misconduct includes sexual harassment and assault. Employers have a legal duty to take reasonable steps to prevent sexual harassment.

Complaints of bullying and/or harassment, including sexual misconduct, are dealt with under the Challenging Bullying and Harassment Policy.

Grievances and complaints of bullying and harassment are not in the public interest as they generally only impact one individual or a small number of individuals. However, if for example the ICR repeatedly failed to take action to investigate such complaints or failed to take appropriate action where a complaint has been substantiated via an investigation, that failure may potentially give rise to a disclosure made in the public interest (Whistleblowing).

### Section 3: Data

#### Complaints made via Human Resources

Complaint type	Relevant policy	Number made
Complaints relating to bullying and harassment	Challenging Bullying and Harassment Policy	8
Complaints unrelated to bullying and harassment	Grievance Policy	0
Disclosures of public interest	Whistleblowing Policy	0

#### Complaints made via Report + Support

Complaint type	Anonymous or with contact details	Number made
Complaints relating to bullying and harassment	With contact details	5
Complaints related to sexual harassment	One anonymous, one with contact details	2

No complaints were made via Report + Support for 1 August 2024 to 31 October 2024

No complaints were made via Report + Support for 1 February 2025 to 30 April 2025

Total complaints made = 15

## **Section 4: Routes for raising concerns**

Staff and students may raise concerns directly with their line manager/student supervisor – however, if the concern involves that individual there are other routes for raising concerns. Students may also raise concerns with their Senior Tutor or a member of the Registry Team.

Staff who have concerns may speak in confidence to a member of the HR Operations team either informally or formally. HR will discuss with the staff member how they might wish to deal with the issue, for example through an informal discussion with the subject of their complaint, through mediation, or via a formal complaint process (under the Grievance Policy or the Challenging Bullying and Harassment Policy depending on the type of concern).

Staff and students may also speak in confidence to a Wellbeing Champion or Union representative. Increasingly, feedback from these groups is that staff/students do not wish them to take the matter further or disclose it to HR. In such cases, Wellbeing Champions and Union representatives recommend to the complainant that they use Report + Support platform (see below) to report a concern, either anonymously or providing their contact details. If they feel it appropriate, the Wellbeing Champion or Union representative can report a concern via the platform themselves.

Report + Support is an online platform which allows staff and students to report a concern, providing as much or as little detail as they wish. Anonymous complaints are reviewed together with named complaints and complaints made via other sources to help identify trends or hotspots. Named complaints are assigned to a member of the HR or Registry Team depending on whether the complainant is an employee or a student. They are then contacted by the assigned person to discuss their concern and how they wish to proceed, with the aim of resolving the matter.

Disclosures made under the Public Interest Disclosure Act, known as “whistleblowing” must meet specific criteria. Whistleblowing is the action someone takes to report wrongdoing at work that affects others. For example, it could affect a large number of employees, or the general public. A disclosure may relate to a criminal offence, the breach of a legal obligation by an organisation, a miscarriage of justice or damage to the environment. It normally relates to something an organisation has or has not done, rather than something that an individual has or has not done. However, if the ICR routinely failed to investigate concerns raised about inappropriate behaviour towards individuals or to take appropriate action should investigations substantiate an individual’s allegations, it may be appropriate for the individual to use the Whistleblowing Policy in this case (to report systematic failure to investigate concerns, rather than to report their particular complaint).

## **Section 5: Workers Protection Act 2024**

A new duty under the Equality Act 2010 now requires employers to take “reasonable steps” to prevent sexual harassment of their employees and create a safe working environment. The Worker Protection Act (2024) has been in force since 26 October 2024.

The law does not list specific steps an employer must take. Different employers may seek to prevent sexual harassment in different ways, but all employers must take action, and no employer is exempt from the sexual harassment preventative duty.

Our bullying and harassment policy has been updated to include guidance on sexual misconduct. The policy will require further updating in relation to guidance from the Office for Students, which comes into effect in August 2025.

A Risk Assessment and checklist has been produced which has highlighted the need for mandatory training for staff, students and managers covering how to recognise and report sexual harassment, managers' responsibilities in preventing abuses of power, preventing inappropriate behaviour and conducting investigations and regular diversity and inclusion training.

Should the ICR fail to meet our new legal obligations under the Worker Protection Act (2024), for example by failing to implement training for staff and students, this could give rise to a complaint made under the Whistleblowing Policy.

### **Section 6: Actions taken to tackle concerns and raise awareness of reporting routes**

A presentation on the ICR's Whistleblowing Policy and procedure was made at the January Professional Services briefing and circulated to all ICR staff, including other ways to raise concerns that may not fall under Whistleblowing. Further promotion of the ICR's Whistleblowing policy and procedure, and other ways of raising concerns was published on Nexus as an "In Focus" topic in March 2025.

Quarterly "Early warning meetings" are held, with the Chief People Officer, Chief Research and Academic Officer, the Deputy Dean and Deputy Director, HR Operations, to identify common themes that may be being reported via different routes and to discuss any appropriate action which needs to be taken.

The Report + Support platform was promoted via the Students' wellbeing induction and as part of World Mental Health Day in October 2024 via the digital noticeboards and in an article on Nexus in November 2024 as part of Anti-bullying Week. A presentation was also made to the Research Degree Student Liaison Committee in February 2025.

Updates on the new legislation relating to sexual harassment was presented to Wellbeing Champions and to the Athena Swan Steering Group.

Guidance on appropriate behaviour was provided as part of the promotion of our Winter Social event, including how to report inappropriate behaviour.

Links to short webinars on understanding and confronting sexual misconduct at work were promoted as part of Sexual Abuse and Sexual Violence Awareness Week (February 2025).

The Supportive Workplace training is currently being updated, which is mandatory for all new starters.

### **Section 7: Further actions scheduled**

Additional questions will be included in this year's staff survey (due in October) to check awareness and understanding of different routes to raise concerns and to explore whether there is reluctance to report and if so, why.

The use of quick polls on Nexus to gauge awareness of routes for raising concerns (more immediate than the staff survey) is being investigated.

HR and Internal Communications colleagues are having discussions on better ways to promote new policies or key changes, when to use these policies and who to contact for further information.

Training is currently being designed for Senior Tutors on bullying, harassment and discrimination, including identifying early warning signs, understanding power dynamics and why students may be reluctant to speak up, particularly those from different cultures. This training is expected to be delivered in September/October.

A revised Bullying and Harassment policy is currently being approved; in conjunction with the Internal Communications team, the revised policy will be promoted to all staff and students, drawing attention to the new duty to take proactive steps to prevent sexual harassment.

### **Section 8: Further considerations**

The following recommendations are aimed at upskilling staff in recognising and managing inappropriate behaviour and demonstrating that appropriate action is taken to tackle such behaviour. We have not made further recommendations regarding promoting ways of reporting concerns, as this is done regularly and via a number of media, which will be continued.

1. Invite those submitting exit interviews mentioning bullying or other unacceptable behaviour to discuss the matter in confidence with an HR colleague, Wellbeing Champion or Union representative, so that more information can be gathered in order to inform positive action.
2. Introduce mandatory training for all Heads of Division, Group Leaders, Professional Services Directors and Deputy Directors on how to respond to complaints and allegations. This should be run annually for new managers and refresher training required every two years.
3. Prompt quarterly reporting of complaint statistics and actions taken made available to all staff and students via Nexus.