

Dignity & Respect at Work Policy

Policy document

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At Ofcom we have a zero-tolerance approach to any form of bullying, harassment, or discrimination. We expect all colleagues to be treated, and to treat others, with dignity and respect at all times.

This Policy explains:

- How we expect our colleagues to behave.
- What to do if you see or experience inappropriate behaviour.
- How we can all help to create a respectful working environment.
- How to access impartial emotional support whether you are experiencing inappropriate behaviour, you have been accused or you are supporting a colleague.

This Policy applies to all permanent and fixed term colleagues, as well as agency workers and contractors.

Please note that this policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

Where to get advice & support

If you would like to discuss anything in relation to this policy, either for yourself or as a Career and Performance Manager (CPM), please don't hesitate to contact the [Employee Relations & Policy Team](#). Any information you provide to us will be in the strictest of confidence, unless either you allow us to share it, or we believe you or someone else is at risk of harm. This is in accordance with our [Data Protection Policy](#).

You can also access a range of other support through our [Thrive@Ofcom](#) programme.

Our approach to ensuring Dignity & Respect

We all have a responsibility to create a culture where bullying, harassment, and discrimination does not exist at Ofcom, and challenging or reporting it if we see it happening. We want all colleagues to feel able to perform to the best of their ability in a supportive, open, and inclusive environment.

Ofcom expects colleagues to treat each other, and those they interact with through the course of their work, with dignity and respect and to consider whether their words or conduct could be offensive to others. This applies to all channels of communication including face to face, email, instant messaging, Teams, online via any form of social media, and applies at all times – including outside work.

Please note, if we find that you have bullied, harassed, or discriminated against someone, made false allegations, or treated a colleague badly because they have raised a legitimate concern, we may regard this as potential gross misconduct, and you could be dismissed without notice under the [Disciplinary Policy](#).

What is harassment?

In discrimination law (Equality Act 2010) there are 3 types of harassment:

- harassment related to certain protected characteristics.
- [sexual harassment](#).
- less favourable treatment as a result of harassment.

Harassment and bullying are often confused. Bullying behaviour can be harassment if it meets these definitions. It is also possible that serious harassment could also be a hate crime.

If someone's behaviour is unwanted and causes offence, even if it wasn't done on purpose, it may be harassment. The unwanted behaviour doesn't have to be aimed at you for you to be offended by it. If it creates an intimidating or offensive environment for you or anyone else, then it could be harassment.

Examples of harassment at work

- Sexually suggestive jokes, comments or innuendo, offensive gestures or whistling.
- Unnecessary touching.
- Suggestions that sexual favours may further someone's career, or that refusing them may damage it.
- Offensive remarks relating to any protected characteristic.
- Outing a colleague based on their sexual orientation and / or gender identity without their permission.
- Repeatedly using the wrong pronouns or name for someone who is trans or non-binary, despite having the correct information.
- Ridicule or assumptions based on racial stereotypes.
- Spreading rumours or gossip about someone's sexual orientation or gender.

- Making jokes or offensive remarks about someone's disability or long-term condition.
- Excluding someone because of their political opinion or religious group.

Harassment can include:

- A serious one-off incident.
- Repeated behaviour.
- Spoken or written words, imagery, graffiti, gestures, mimicry, jokes, pranks, or physical behaviour that affects the person.
- Exclusion.

It's still against the law even if the person being harassed does not ask for it to stop.

What is bullying?

Bullying 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.

The bullying might:

- be a regular pattern of behaviour or a one-off incident.
- happen face-to-face, on social media, in emails or calls.
- happen at work or in other work-related situations.
- not always be obvious or noticed by others.

Examples of bullying at work

- Someone has spread a malicious rumour about you.
- Your manager keeps giving you a heavier workload than everyone else.
- Someone keeps putting you down in meetings.
- Someone holding back information or deliberately "losing" information.
- Being excluded from team social events.
- Someone has put humiliating, offensive, or threatening comments or photos on social media.
- Someone at the same or more junior level as you keeps undermining your authority.

Bullying is not:

- Being held accountable for your performance or behaviour.
- Constructive feedback.
- Conflict or difference of opinions discussed in a respectful way.

Upward bullying

Upward bullying is when a colleague bullies a more senior colleague or manager. It can be from one colleague or a group of colleagues. Examples of upward bullying can include:

- showing continued disrespect.
- refusing to complete tasks.
- spreading rumours.
- doing things to make you seem unskilled or unable to do your job properly.

It can be difficult if you are in a senior role to realise you are experiencing bullying behaviour from your colleagues, however a senior position does not make you immune to the impact and effects of bullying and we would take any allegations just as seriously as any other.

What is victimisation?

Victimisation means being treated badly because you have:

- Brought an employment tribunal claim alleging discrimination.
- Complained about discrimination.
- Given evidence or information in relation to someone else's claim about discrimination.

The law only protects you from victimisation if you've done something in good faith. This means not acting maliciously. You are not protected from victimisation if you:

- deliberately give false evidence.
- deliberately make a false allegation of discrimination or harassment.

Example of victimisation

A colleague was a witness at an employment tribunal, supporting another colleague who made a claim of sex discrimination. They apply for a promotion and do not get it. A member of the selection panel says they are a troublemaker who supported a discrimination claim against Ofcom. If this is the reason for the panel's decision, the colleague is being victimised.

If you disagree with your CPM's actions

Bullying is not the same as managing someone. If your CPM is giving you work to do, or managing your conduct, performance, or sickness using an informal or formal process - and they're doing that in a professional and supportive way - this will not on its own be considered bullying.

However, if you do feel that your CPM's behaviour towards you is unacceptable, talk to them about it. If you feel like you can't do this, there are other ways you can raise your concerns – see the [Grievance Policy](#) for more information.

What to do if behaviour breaches this policy

If you experience unacceptable behaviour that you believe falls outside the expectations outlined in this policy, there are several ways to resolve this.

If you witness unacceptable behaviour against someone else, you can speak to your CPM or the [Employee Relations & Policy team](#) for advice and support. Please note, the [Whistleblowing Policy](#) is also available if you believe the incident fits under the Whistleblowing criteria.

Resolving things informally

It's always better to try to sort things out informally if possible. Explaining to the colleague responsible how it makes you feel and asking them to stop may get things resolved. They might not realise the impact of their words or actions or have meant to offend you.

But if you do not feel able to speak to the person, talk to your CPM about the problems you are having. If it is appropriate, your CPM may speak to them confidentially to say that their behaviour is inappropriate and needs to change. Wherever possible your CPM will aim to resolve things quickly and informally without the need to use a formal process. Dealing with things informally is often much less stressful and quicker for everyone involved than a formal process.

Resolving things formally

If you don't feel you can speak to your CPM, or if your complaint is about them, you can speak informally to either your CPM's CPM, or the [Employee Relations & Policy Team](#). If this does not resolve the issue, or you do not feel it is the right course of action, you may decide to submit a formal [grievance](#). Your complaint will be investigated, and the appropriate action taken.

If you are a CPM, and you witness unacceptable behaviour that you believe constitutes a breach of the expectations outlined in this policy, you may proceed to investigate the matter under the [Disciplinary Policy](#) if informal resolution has not been successful, or you deem the alleged incident too serious. Please contact the [Employee Relations & Policy Team](#) who will advise you on next steps.

Further considerations

Remember, you are responsible for your own behaviour while at work, any time you are representing Ofcom outside of the workplace, or at any work-related event. We are all expected to be respectful and considerate of other people and individual differences.

If you experience unwanted or offensive behaviour that happens outside of the workplace but still to do with your work, for example at a work-related social event or training course, or social event with colleagues whether organised by Ofcom or not, tell your CPM or the ER team. They will seek advice on how to deal with the issue in line with this policy.

Behaviour of consumers or external parties

If you experience or see inappropriate behaviour by consumers or third-party contractors, it is really important you do not feel you just have to put up with it. Incidents of inappropriate behaviour should not be tolerated. Please speak to your CPM or the ER team who will support you in resolving this.

Version history

Version	Date	Revised by	Summary of changes
1.0	31/01/2019		Document created
1.1	27/01/2020		Review update
1.2	01/12/2020		Review update Alignment with the Disciplinary and Grievance Policies
1.3	31/03/2022		Reviewed and updated the links
2.0	01/04/2024		Refreshed and updated – aligned with other policies and linked to disciplinary and grievance policies.
2.0	01/04/2026		Regular review – no updates.