

POLICY ON DIGNITY AT WORK IN RESEARCH

1 Purpose

This policy sets out Cancer Research UK's (CRUK's) position and commitment to fostering a culture in research where everyone is treated with dignity and respect. We believe that all people working at CRUK or involved in CRUK-funded activities should be able to work in an environment where everyone is treated, and treats others, fairly and with respect. Behaviour that causes harm of any kind is unacceptable and is not tolerated.

2 Scope

This policy applies to all participants involved in CRUK research as outlined in our policy.

Our Policy for Research Involving Human Participants covers CRUK's position on all research involving human participants, including clinical trials, behavioural intervention trials and clinical studies.

Our commitment to CRUK staff and volunteers is addressed separately in the CRUK Dignity at Work and Safeguarding Policies. This document deals specifically with those involved in research activities that we fund and support.

3 Definitions

CRUK defines behaviours that cause abuse and harm, bullying and harassment as outlined in this section, however institutions should follow their own institutional policy definitions.

Bullying

Bullying can be, but is not limited to, abusive, offensive, malicious, insulting, intimidating or manipulative behaviour, involving an abuse or misuse of power or

position, which has the intent or effect of making someone feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can relate to personal strength, the dynamics in a group and the ability to coerce through fear or intimidation. Bullying is usually a regular pattern of behaviour, although sometimes it can also take the form of a one-off incident.

Harassment

In the UK, harassment is defined by the Equality Act 2010 as (in other countries, definitions may differ) 'unwanted conduct related to a relevant protected characteristic that has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for the complainant or violating the complainant's dignity'. Protected characteristics are: age, sex, disability, gender (including gender reassignment), marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. Unlawful harassment may also involve conduct of a sexual nature – this is sexual harassment.

CRUK defines further types of abuse and harm according to the statutory types of abuse in the UK which include, but are not limited to:

Physical abuse, domestic violence/abuse, modern slavery, discriminatory abuse, organisational/institutional abuse, neglect/acts of omission, self-neglect, cyber-bullying, child sexual exploitation, child trafficking, criminal exploitation/gangs, female genital mutilation, grooming, neglect, online abuse.

4 Key Points

4.1 What CRUK expects from people involved in CRUK-funded research

CRUK expects all participants involved in CRUK-funded research to treat each other with dignity and respect. 'Participants' include:

- Grantholders
- Co-investigators
- Collaborators

- Research staff and consultants
- Supervisors
- Students
- Sub-grantees and sub-contractors
- CRUK funding committee and panel members.

Anyone can report a concern about CRUK-funded research. Organisations must have processes in place to enable reporting. Section 4.6 below outlines how CRUK handles allegations.

4.2 What CRUK expects from Relevant Organisations involved in CRUK-funded research: providing a positive work environment

We expect organisations involved in CRUK-funded research to prevent harm and address any concerns that bullying, harassment, harm or abuse has taken place or that may arise. This includes organisations to which CRUK provides core funding and those who agree to CRUK's Grant Conditions through a grant application submission ("Relevant Organisation").

Relevant Organisations must ensure that where there are potential risks of harm to those involved in CRUK research, a risk assessment will be undertaken that will consider and mitigate any such risks. Risk assessments are not required at the time the application is made but must be completed before the research starts.

It is the Relevant Organisation's responsibility to:

- (i) Have policies in place to prevent and address bullying, harassment, abuse and harm that clearly state:
 - the standards of behaviour and safeguarding responsibilities it expects from staff.
 - their procedure for handling allegations, including a clear place to submit allegations to and escalation routes. Investigations into allegations should consider the review, rights and safety of the victim/survivor. making the allegation (if they are not the same)

Policies should be available to all staff and students, form part of induction processes and staff training, and ideally published on the Host

Institution's intranet.

- (ii) Make sure that there is an equivalent policy in place at any sub-grantee or sub-contractor.
- (iii) Ensure any relevant privacy statement permits the sharing of data in accordance with this policy and that all Participants and relevant organisations have read and are aware of the potential for information sharing.
- (iv) Take reasonable steps to ensure the policy is implemented effectively. Reasonable steps may include:
 - appropriate training for staff and students during inductions and additional training for staff in supervisory roles or for officers dealing with concerns appropriate to their role. Training should be refreshed periodically or in response to any changes
 - the establishment of an effective whistleblowing hotline or other mechanism
 - engagement with staff and students on the issue by undertaking awareness raising campaigns and engagement surveys to ensure policies are working effectively and the workplace is free from bullying, harassment, abuse or harm.
- (v) Investigate allegations of bullying, harassment, abuse or harm in an impartial, fair and timely manner and take appropriate action. If the organisation is advised by the investigator(s) that a disciplinary procedure is warranted, CRUK expects Relevant Organisations to complete the disciplinary procedure such that a formal finding can be reached, and disciplinary procedures are applied. The disciplinary procedure should still be concluded even if the subject of the investigation resigns.
- (vi) Ensure no agreements are entered into which prevent Relevant Organisations from telling CRUK of investigation findings and complying with our policy.
- (vii) Document the findings of the investigation.

4.3 What CRUK expects from Relevant Organisations: notifying CRUK of reports

- (i) **At application stage:** When a Host Institution submits a grant application to CRUK, it must confirm that, other than as notified to CRUK, there have been no findings of bullying, harassment abuse or harm upheld against the Lead Applicant(s), nor any of its employees or students who are named on the application as proposed Participants (defined above in section 4.1), for which there is an active formal disciplinary sanction for bullying, harassment, abuse or harm. Where Participants are not based at the Lead Applicant's Host Institution, the Relevant Organisation is responsible for reporting upheld findings directly to CRUK. The Relevant Organisation should complete the reporting pro-forma template annexed to this policy and email it to CRUK's Director of Research Operations and Communications at dignityinresearch@cancer.org.uk, telling CRUK if any of the information provided is confidential. Please also note the information required at application stage in section 4.3(iii) below. If there has been a finding of bullying, harassment, abuse or harm, CRUK may reject the application where we feel there is continued risk to people or to CRUK's principles or ask that the relevant individual(s) be removed from it.

- (ii) **Where a Relevant Organisation is responsible for Participants, or is involved in CRUK-funded research:** (defined above in sections 4.1 and 4.2), and a decision is made to formally investigate an allegation of bullying, harassment, abuse or harm, the Relevant Organisation must inform CRUK's Director of Research Operations and Communications when they decide to investigate via the process in section 4.3(iii) below. within one month of deciding to undertake a formal investigation (and must be reported at this stage at the latest) unless the case is deemed high-risk or an allegation is demonstrably irrefutable at an earlier stage, in which case CRUK should be informed immediately. Where Participants are not based at the Grantholder's Host Institution, the Participant's own Relevant Organisation is responsible for reporting upheld findings directly to CRUK.

CRUK reserves the right to ask for the name of the Participant whose conduct is being investigated, where we consider that we have a legitimate interest in doing so.

CRUK will reserve any judgement about an allegation until the investigation is complete. CRUK will only provide information to its staff or its external advisors on a need-to-know basis. The Relevant Organisation must inform CRUK of:

- a. a decision to formally investigate an allegation of bullying, harassment, abuse or harm; and
- b. the outcome of the investigation and if any sanctions are being imposed.

The Relevant Organisation should complete the reporting pro-forma template annexed to this policy and email it to CRUK's Director of Research Operations and Communications at dignityinresearch@cancer.org.uk, telling CRUK if any of the information provided is confidential.

- (iii) When notifying CRUK of a bullying, harassment, abuse or harm investigation, the Relevant Organisation should **only** provide the following information:
- a formal investigation has commenced (*notes: as per section 4.3(ii), we do **not** require the name of the person against whom the formal investigation has commenced at this point, however we reserve the right to ask for it. This step is not applicable at application stage*)
 - where an allegation has been upheld, the name of the person against whom the allegation has been upheld
 - the relevant connection to CRUK (e.g. CRUK grant reference number or CRUK panel/committee membership if relevant) where this does **not** identify the person
 - a brief factual statement about the nature of the allegation
 - the date the allegation was lodged
 - the start date of the investigation and expected/actual investigation

completion date

- for completed investigations only: a brief factual statement on the outcome of the investigation, including whether the allegation was partially or fully upheld and any sanctions
- the date of the outcome of the investigation
- the name and position of the relevant HR contact at the Relevant Organisation (i.e. the person who is providing the information). CRUK cannot act on unverified, anonymous information.

CRUK reserves the right to request a copy of the investigation report, where we consider we have a legitimate interest in doing so.

4.4 Why CRUK asks to be informed and what we do with this information

While CRUK recognises that the requested disclosures under this policy may include personal data, we consider we have a legitimate interest in handling this data.

This requires CRUK to undertake a balancing test to ensure that there are no unwarranted adverse effects on the individual.

UK data protection legislation does not prevent the sharing of this data. Whilst CRUK recognises that often information is confidential in nature due to the employment relationship, CRUK maintains the quality of confidence where allegations are under investigation and there is no immediate risk of harm to others.

During the application stage, CRUK needs to be aware of upheld allegations, so that we can make responsible funding decisions.

After an award has been made, the Relevant Organisation must tell us when a formal investigation into bullying, harassment, abuse or harm has been started. This is so that CRUK can:

- monitor that complaints are being dealt with appropriately and in a timely manner

- make sure that grantholders receive the support they need, and
- be aware of the potential impact on CRUK-funded activities and the steps being taken to manage that impact; and
- make any necessary onward report required by our regulator (the [Charity Commission for England and Wales](#)) and other relevant bodies as required by law.

The information you provide at any point should **not** include any:

- sensitive personal information (such as special category personal data, as defined in UK Data Protection Law) or information relating to criminal offences or convictions. (In some circumstances such information may be pertinent to the investigation. Should a Relevant Organisation feel that they did want to provide special category data, they should ensure that this meets the requirements of Article 9 of GDPR, for example with the consent of the data subject.)
- personal details about other people, e.g. the person making the claim.

Any information you send to us will:

- be handled in confidence and in accordance with data protection law requirements
- be stored in a secure, restricted-access location, with access restricted to two members of staff involved in the management of these cases:
 - Senior Policy & Governance Manager
 - Director of Research Operations & Communications
- be communicated only to other CRUK staff on a need-to-know, restricted-access basis only, where necessary, to pursue our legitimate interests as a funder. This includes making sure that:
 - CRUK can access legal or safeguarding advice.
 - grantholders get the support they need from CRUK
 - the outcomes of CRUK-funded grant activities are not at risk.
 - CRUK is able to monitor the number of outstanding cases. CRUK's Scientific Executive Board and Research Committee review anonymised data relating to outstanding cases on a periodic basis.
- not be communicated to expert reviewers.

- be kept by CRUK in line with our retention policy, reviewed regularly to assess whether it can be removed, and for no longer than we need it for our legitimate purposes. Any allegations that are not upheld will be stored for two years after the outcome, the remainder will be stored for six years after the outcome, or the point at which any sanction ends whichever is later
- be communicated to other organisations only where:
 - the grant is co-funded by another organisation(s). CRUK may share details of the allegations and its result when known.
 - CRUK has a statutory obligation to report serious incidents to the Charity Commission for England and Wales or to comply with a court or regulatory order to pass the information on.

CRUK may convene a Research Conduct Review Panel – comprising designated senior members of CRUK’s governance boards – to review the outcome of an investigation and take a decision on what potential, appropriate sanctions CRUK should then take as a research funder (see section 4.5). Information shared with the Panel will be highly restricted, accessible only to those designated senior individuals.

All personal data provided will be managed in accordance with CRUK’s Information Security & Data Protection Policy. Information on how to exercise Data Subject Rights are made available via the [CRUK Privacy Statement](#).

4.5 Sanctions

After reviewing the investigation and disciplinary procedure outcomes, CRUK may apply its own sanctions. Sanctions may vary in length, depending on the seriousness of the case and any remedial action already in place.

These will be independent of any set by the Relevant Organisation and will be considered on a case-by-case basis.

CRUK may:

- send a letter of concern

- where the person remains in post, they may be required to attend workplace behaviour training before continuing on a CRUK grant or applying for further CRUK funding
- remove the person from the affected grant(s), from a CRUK Panel or Committee
- withdraw funding from the grantholder. CRUK will work with the Relevant Organisation to minimise the impact on any staff working on the affected grant(s), which may include transferring the grant to another suitable investigator to allow the work to be completed.
- prohibit that person from acting as a PhD supervisor for CRUK-funded students
- temporarily or permanently restrict them from future grant applications (or specific types of grant applications) or from being invited to be a member of a CRUK Panel or Committee
- allow future grant applications, but require the Relevant Organisation to monitor the way the person manages staff
- require training and/or monitoring of future work
- take any further sanctions at its own discretion.

CRUK may apply sanctions against a Relevant Organisation if CRUK believes:

- the Relevant Organisation has failed to respond to a bullying and/or harassment complaint promptly and objectively
- there has been institutional-level failure to complete disciplinary procedures
- there has been a serious Institutional-level failure to effectively ensure appropriate workplace conduct standards are observed.

Sanctions may include:

- ongoing monitoring of the Relevant Organisation's policies and practices
- not accepting new grant applications from that Relevant Organisation for a period of time
- restricting applications for specific grant types, e.g. not allowing participation in training programmes
- suspending funding to the Relevant Organisation in extreme cases
- taking any further sanctions at its own discretion.

4.6 How CRUK handles allegations

Anyone can report a concern or allegation of bullying, harassment, abuse and harm related to CRUK-funded research. Concerns and allegations should always be reported to the employing organisation, or if this is not known, the organisation that is running the research project. It is the employing organisation's responsibility to investigate.

If an allegation of is made directly to a member of CRUK staff or via email to dignityinresearch@cancer.org.uk rather than to the Relevant Organisation:

- a senior CRUK staff member will first discuss the circumstances with the informant
- CRUK will either encourage the informant to report the allegation at their employing organisation through the appropriate channels or then tell an appropriate individual at the employing organisation if the individual is unwilling or unable to report the allegation directly to the organisation.

We may also pass the allegation to the employing organisation where there is a risk to the safety of others. When this is the case, we do not need to consent of the informant to do so.

We will respect an informant's anonymity. In exceptionally rare circumstances, we will share their information if required to do so under a court order, if requested by the police or other regulatory or government authority, if it is necessary to protect the vital interests of any individual or if otherwise required to do so by law. CRUK will tell the informant before it does this.

The employing organisation is then responsible for following its own allegation procedures.

CRUK will reserve any judgement about an allegation until the investigation is complete. CRUK will only provide information to its staff or its external advisors on a need-to-know basis.

4.7 CRUK's role in any investigation

As stated above, it is the employing organisation's responsibility to investigate allegations, and this is our preferred course of action.

However, CRUK may:

- ask for information about an organisation's processes and how they are effectively implemented
- check that an organisation and any sub-grantee have a policy and are following it.
- ask for a copy of the full, final investigation report, where we consider that we have a legitimate interest in doing so.

This may be done as part of CRUK's standard funding assurance process, grants management audits or as part of the annual review process in the case of organisations holding core-funding from CRUK.

If an investigation has been completed and an individual has concerns about the process, CRUK will ask the Relevant Organisation to confirm that it has adhered to its published policy. We are not able to challenge the outcome of the investigation.

Where we exercise our right to see the above information, we expect Relevant Organisations to be able to share it. We strongly discourage the inappropriate use of non-disclosure agreements that might prevent organisations from sharing this information with us.

Formal allegations, reports of allegations or complaints about process, should be reported to CRUK, as outlined in this policy, and within five years of the alleged incident.

5 Support & Advice

For any queries about this policy please contact:

dignityinresearch@cancer.org.uk

6 Related documents

For more information, please see the following linked documents:

- [CRUK's Conditions of your Grant](#)
- [Code of Practice for Funding Committees and Panels](#)

Policy sponsor	Dr Iain Foulkes, Executive Director of Research & Innovation, CEO Cancer Research Horizons
Policy owner	Dan Burkwood, Director of Research Operations & Communications
Subject Matter Experts (SME)	Sue Russell, Senior Policy & Governance Manager
Executive Board or Council approval required?	Yes – Scientific Executive Board
Date of last review	February 2025
Next review due	February 2028
Superseded documents	Version 3

Summary of changes

Key changes to the policy should be recorded below:

Version	Date	Author	Approved by	Summary of Changes
4	04/02/25	Sue Russell	SEB	<ul style="list-style-type: none"> - Expand to include abuse/harm (safeguarding) - Clarify which organisations are required to report investigations, when and why - Clarify CRUK's role when directly approached by researchers
3	31/01/23	Sue Russell	SEB	<ul style="list-style-type: none"> - Reformatted policy into new template - Job title changes for the Director of Research Operations & Communications

Dignity at Work in Research Reporting Form to Cancer Research UK

Relevant Organisations must inform CRUK's Director of Research Operations and Communications about:

- a. any decision to formally investigate an allegation of bullying, harassment, abuse or harm related to CRUK-funded research and, once it is known, the outcome of that investigation (note: we do **not** require the name of the person against whom the formal investigation has commenced at this point, however we reserve the right to ask for it. This step is not applicable at grant application stage); and
- b. at CRUK grant application stage only: an upheld allegation against the Lead Applicant(s) or any employees named on the application, for which there is an active formal disciplinary sanction. CRUK does not expect to be informed of ongoing and unresolved investigations (ie. para (a) above) for applicants until if and when the application is successful, or the allegation is upheld, whichever is earlier.

The Relevant Organisation contact should complete this reporting template, indicating if any information is confidential and email it to dignityinresearch@cancer.org.uk. You should **only** provide the information requested below. You should **not** include:

- sensitive personal information (such as special category personal data, as defined in Data Protection Law) or information relating to criminal offences or convictions.
- personal details about other people, e.g. the person making the claim

Your name, position at Organisation and email (*CRUK cannot act on unverified, anonymous allegations*)

--

The name of the person against whom an allegation has been upheld (note: the name is **not** automatically required at start of an investigation however, we reserve the right to ask for the name)

The person's connection to CRUK (e.g. CRUK grant reference number or CRUK Committee membership)

(note: only provide this where it does **not** identify the person)

A brief factual statement about the nature of the allegation

Date the complaint was lodged

Start date of the investigation and expected/actual investigation completion date

For completed investigations only: a brief factual statement on the outcome of the investigation, including whether allegation was partially or fully upheld and any sanctions

Date of the outcome of the investigation

As outlined in our Policy, the information you send to CRUK will be: stored in accordance with data protection law requirements; communicated on a need-to-know, restricted-access basis only; and updated and/or deleted in line with our retention policy.