

## Policy for Preventing and Addressing Bullying Harassment and Sexual Misconduct

***NB. This policy is available on the University of Cumbria website and it should be noted that any printed copies are uncontrolled and cannot be guaranteed to constitute the current version of the policy.***

<b>POLICY SCHEDULE</b>	
Policy title	Policy for Preventing and Addressing Bullying Harassment and Sexual Misconduct
Policy owner	Emma Bales
Policy lead contact	
Approving body	EDIW committee
Date of approval	2023
Date of implementation	2023
Version no.	1.1
Summary of changes since the previous version	12.7.24 removed reference to Student Complaints Policy and use of the term "complaint/s" in relation to student procedures
Related Guidelines, Procedures, Codes of Practice etc.	
Related stakeholder's responsible eg are there external stakeholders who have related responsibility and if so, for which area of the Policy?	
Review interval	Bi-annual

## **1. Contents page**

## **2. Introduction**

The University of Cumbria's values articulate our commitment to mutual respect and understanding and place an emphasis on underpinning all our practices with trust and honesty.

The University is committed to providing a positive work and study experience for all of our stakeholders, which includes a zero-tolerance approach to bullying, harassment or sexual misconduct. We pro-actively seek to ensure that this commitment is reflected in the behaviour and practices of our university community. Our University community is diverse and our students study on our campuses, in their workplace, flexibly, remotely, on-line and through our educational partnerships. Our T2030 strategy recognises that our approach to their varied needs and expectations will need to reflect this.

The [Student Charter](#) highlights that the University of Cumbria is "a community of students, staff, partner organisations and the Students' Union. Working together we aim to achieve the missions and uphold the values of the University of Cumbria and the University of Cumbria Students' Union (UCSU)".

It is recognised that bullying, harassment and sexual misconduct have a detrimental effect on the health, confidence, morale and performance of those affected. The University takes seriously issues of bullying, harassment and sexual misconduct and is committed to taking action where concerns are raised. This policy is designed in line with the Office for Student guidelines on free speech, which stands for the widest possible definition of freedom of speech: anything within the law.

## **3. Aims and Objectives**

The University aims to promote a culture where harassment, sexual misconduct or bullying of any student or member of staff is unacceptable.

This policy sets out the expectations of behaviour of our staff and students and provides approaches for dealing with allegations of bullying, harassment and sexual misconduct. It aims to protect students, employees and all connected with the University from sexual harassment and inappropriate behaviour.

## **4. Equality, Diversity and Inclusion Statement**

The University of Cumbria is committed to providing an inclusive environment, where staff, students and visitors are encouraged to be their true self, in order to enhance the individual and collective experience. As a university community, we share the social responsibility of enabling this inclusive environment by valuing, respecting and celebrating differences, to ensure that we generate a sense of understanding and belonging.

The university recognises that our differences are our strength, seeking and valuing different perspectives and ideas, in an environment that is without prejudice and bias.

We are committed to embracing our responsibility as a facilitator of change and continue to develop our equality agenda in line with and, where appropriate, beyond the Equality Act 2010. We do not tolerate discrimination, bullying or harassment in any form on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

## **5. Scope**

This definitions, policy principles and roles and responsibilities outlined within this policy apply to any student enrolled on a course of study with the University of Cumbria whether or not the enrolment leads to a final award, wherever the student is based and regardless of the level or mode of study.

The definitions, policy principles and roles and responsibilities outlined within this policy also apply to all University employees.

For the purposes of this Policy, 'employees' are defined as any individual either employed or engaged by the University on a paid or unpaid basis to carry out work for the University under any type of employment contract. This includes:

- Students undertaking paid or unpaid work
- People designated as workers for the University.
- Agency workers and honorary appointments
- People working on a voluntary basis at the University and those working as contractors are also bound by the terms of this Policy as is any person engaged with or representing the University.

This policy is designed to cover instances or alleged instances of Sexual Harassment. Consensual relationships and interactions between Students, Staff and third parties are covered in the Professional Relationships between Employees and Others Policy.

Any student who believes they, or another student they know, is being bullied or harassed by another University of Cumbria student or staff member, and any student who may be the subject of such an allegation, should also refer to the advice and guidance set out in the Student Prevention of Bullying Harassment and Sexual Misconduct Procedures and Processes.

Concerns regarding instances of allegations of alleged staff misconduct related to this policy will be dealt with under the Staff Prevention of Bullying Harassment and Sexual Misconduct Procedures and Processes.

Disclosures that are not about a University of Cumbria student or staff member, for example concerns about a colleague within an apprentice's work place setting, need to be directed to the relevant organisation for consideration.

## **5. Definitions – please see appendix 1 for the full set of definitions**

### **5.1 Bullying**

Bullying can be defined in many ways but is generally behaviour that is identified as a misuse of power.

According to ACAS guidance, bullying is intimidating, hostile, degrading, humiliating or offensive behaviour, through means which have the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, or humiliating environment. Bullying usually involves a repeated course of conduct.

This may make the recipient feel upset, threatened, humiliated or vulnerable and undermines self-confidence. Bullying behaviour is not necessarily always obvious or apparent to others.

Bullying is not unlawful but harassment based upon any of the characteristics listed in the definition above, is unlawful under the Equality Act 2010.

### **5.2 Consent**

Consent is agreeing by choice and having the freedom and capacity to make that choice. The person seeking consent should always take steps to ensure that consent is freely given, that it is informed and recognises that it can be withdrawn at any time.

### **5.3 Disclosure**

Disclosure, for the purposes of this Policy and procedure, involves an individual choosing to tell anyone who is part of the University, about their experience of bullying, harassment or sexual misconduct. Unlike Reporting, Disclosure does not necessarily trigger an investigation or action but it would lead to support being offered.

### **5.4 Harassment** as per the [Equality Act 2010](#)

The University of Cumbria defines harassment as unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. The conduct may be persistent or an isolated incident and can be physical, verbal or non-verbal.

The key is that the conduct is viewed as demeaning and unacceptable to the recipient.

### **5.5 Reporting**

Reporting is the formal process of informing the University of an incident of bullying, harassment or sexual misconduct experienced or witnessed by an individual for the purposes of seeking support and/or initiating an investigation process under the [Student Code of Conduct and Disciplinary](#) procedures for reports made against students or the University's Disciplinary Policy and Procedure, for reports made against staff. (note – Reporting is different from *Disclosure*).

### **5.6 Reporting party**

The Reporting Party is the person(s) who witnessed or was subject to the alleged incident of bullying, harassment or sexual misconduct.

### **5.7 Responding party**

The Responding Party is the person(s) whose behaviour it is alleged amounted to an incident of bullying, harassment or sexual misconduct.

## **5.8 Sexual misconduct**

Sexual misconduct is a form of harassment and is unacceptable behaviour of a sexual nature. It can include but may not be limited to: sexual harassment; sexual violence; intimate partner violence; sexual assault; grooming; coercion or bullying with sexual elements; sexual invitations and demands; sexual comments; sexual non-verbal communication; creation of atmospheres of discomfort; and promised resources or advancement in exchange for sexual access.

Offensive acts and behaviours of sexual misconduct that may result in disciplinary action include (this list is illustrative and not exhaustive):

- sexual intercourse or engaging in a sexual act without consent
- attempting to engage in sexual intercourse or engaging in a sexual act without consent
- sharing private sexual materials of another person without consent
- kissing without consent
- touching inappropriately through clothes without consent
- inappropriately showing sexual organs to another person
- repeatedly following another person without good reason
- making unwanted remarks of a sexual nature

An individual can experience sexual harassment from someone of the same or different gender identity or sexual orientation and the recipient of the behaviour decides whether or not it is unwanted.

ACAS guidance states that sexual harassment can be a one-off event and does not need to be directed at a person. It can be witnessed or overheard. Sexual conduct that has been welcomed in the past can become unwanted.

## **5.9 Sexual violence**

A non-legal term used as an umbrella term to refer to and include the different sexual offences of rape, sexual assault by penetration and sexual assault. These are part of the criminal law and are found in the [Sexual Offences Act 2003](#).

## **6. Policy Principles**

The University of Cumbria holds the following set of Principles to reflect the University's commitment to establishing a culture of support and respect. All members of the university community have a responsibility for upholding the Principles that are as follows:

All students and staff deserve the opportunity to study, learn, work and live in an environment free of all forms bullying, harassment or sexual misconduct.

We will treat all members of our community with dignity and respect at all times, and it is expected that all members of our community will share in this responsibility for creating and sustaining an environment which upholds the dignity of all.

We recognise the significant impact of all experiences of Bullying, Harassment and Sexual Misconduct, and acknowledge the potential detriment to a student or staff member's wellbeing regardless of when the experience occurred.

We will work to sustain an equal and safe environment in which a culture of prevention will be promoted through appropriate and consistently applied education and training. All University staff will be informed of the Policy and will be trained as appropriate to their roles.

Any member of the University is encouraged to formally report cases of bullying harassment or sexual misconduct, whether they are the recipient of the behaviour or are witness to it, as soon as reasonably practicable.

The University will take all allegations and reports seriously and will respond to all Reports of Bullying, Harassment, and Sexual Misconduct promptly, in line with the timescales set out within the relevant procedures, and, whilst recognising that some experiences may constitute a criminal offence, we will ensure that in all cases Reports are carefully and thoughtfully addressed by relevant staff members through a process that is transparent and clearly communicated to the individuals involved.

The University is committed to putting the reporting party at the heart of the process (unless for legal reasons reporting has to be carried out without their consent).

We will respect the right of the individual disclosing an experience to choose how to take forward a Disclosure.

Whilst 3rd party or bystander reports may be submitted, and will be considered, these will only be taken forward as a formal Report with the consent of the individual involved.

Where a crime has allegedly been committed the reporting party is encouraged to report the incident to the Police. Where the Police are involved Internal University procedures may be put on hold, although the Responding party may be suspended from all or part of the University, until the outcome of external investigations and or criminal proceedings is known.

The University reserves the right to refer matters to the Police where a criminal act may have occurred against the University.

Any investigation that the university undertakes will not conclude a criminal outcome, the focus of the process is to determine whether the reported behaviours have breached the respective Student or Staff Code of Conduct.

Confidentiality will be maintained, where possible, throughout the Disclosure, Reporting and investigative processes in recognition of the sensitive nature of Sexual Misconduct and Violence matters. As such, information will usually only be shared with relevant individuals/entities (who may be internal or external to the University, e.g. internal counsellors, witnesses, external experts from specialist agencies like Rape Crisis, Sexual Assault Referral Centres or the Police) with the agreement of the Reporting Party. The University reserves the right, and may be under an obligation, to share information in exceptional circumstances where such disclosure is necessary to protect any individual or the wider University community from harm or to prevent a crime from taking place. Throughout all proceedings, the University will act in compliance with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

The University is committed to providing support for members of its community affected by the issues covered by this policy. Support information is outlined on the [You Report We Support](#) page and includes internal and external support providers.

Staff who receive a report or disclosure from a student should direct the reporting party to the support available on [You Report We Support](#).

We will work with local partners and key groups to forge positive relationships to support all our work in this area.

In addressing experiences and working with both internal and external experts, we will:

- commit to publishing the number of cases that have been dealt with each year;
- seek to learn from each experience, reflecting this learning in our policy and process development;
- respond to national policy and practice;
- provide regular assurance to the Vice Chancellors Executive Committee, Board of Directors and the wider University community, that specific incidents and broader cultural issues are appropriately captured and addressed.

## 7. Roles and Responsibilities

Role	Responsibilities
Vice Chancellor's Executive	Publicly acknowledge the existence of sexual harassment, misconduct and bullying by: Publicly committing to prioritise this work Committing to avoiding, where possible, the use of Non-Disclosure Agreements in relation to cases of bullying, harassment or sexual misconduct. Ensuring that ownership, scrutiny and accountability for progress in this area are visibly held by the Vice-Chancellor and Executive Team. Recognising the benefits of taking active steps to address harassment, and the risk and cost of inaction. Demonstrating commitment to providing resources to drive organisational change by investing in support and education to build an understanding of trauma among staff and university counselling services, so that disclosures are responded to safely and effectively Providing the Board of Directors with information and evidence on the university's commitment to tackling harassment. Embedding policies into institutional governance and reporting structures, to support sustainability and consistency by ensuring the agenda is addressed in a cross-cutting way across the university
Vice Chancellor's Executive Directorate	Modelling a culture of respect, equality and fairness challenge behaviour that does not uphold the organisation's values Being proactive and clear in communicating the processes for students and staff to incidents and seek support. Communicating actions taken to eradicate harassment to the broader university community. Empower students and staff to speak out and to take part in training to tackle unacceptable behaviours. Embedding the responsibility to eliminate harassment into the university's culture, knowledge and practice
Student Services	To ensure appropriate disclosure, reporting and support services for students are in place Build partnerships with specialist sexual violence, domestic abuse and hate crime agencies Report on trends and types of cases, and the impact of policies on the student/staff experience

	Working with the student body, including the students' union, to raise awareness and actively participate in creating culture change across the whole university.
Academic Registry	Report on trends and types of cases, and the impact of policies on the student/staff experience Management of the investigation of reported cases through the disciplinary procedure
HR	To ensure that the policy is readily available and that employees are aware of the expected standards of behaviour. To provide assistance, support and guidance to managers on its application and identifying and developing any associated training need. To review and monitor the operation and effectiveness of the policy. To ensure compliance with legal obligations. To record the number of complaints and associated outcomes and the time taken to resolve allegations.
Managers	To ensure employees are made aware of this policy and associated student and staff procedures. To comply with the policy themselves. To deal with relationship issues sensitively. As a duty of care, to take action on concerns raised by employees. To ensure any allegations of incidents made to them are considered and actions are implemented as appropriate. To ensure such allegations are documented and raised with the relevant HR Business Partner at the earliest possible opportunity. Support staff who have received reports and disclosures
Staff	To be aware of, and comply with, the Policy, associated procedures and other university policies such as the Safeguarding Policy To raise concerns about their own support needs as soon as possible. To ensure they are conducting themselves professionally and appropriately To raise concerns about problematic or potentially problematic relationships with their line manager, involving any combination of either themselves, colleagues or students. To remain within the boundaries of their role and involve specialist student or staff support mechanisms as appropriate
Students	To be aware of, and comply with, the Policy and other university policies such as the Safeguarding Policy and the Student Code of Conduct To raise concerns about their own support needs as soon as possible. To ensure they are conducting themselves in line with the Student Code of Conduct



**8. Records Management Statement**

- The records associated with this policy are controlled by Emma Bales and will be created, stored and disposed of in line with the University’s Records Management guidelines and procedures.
- The University is committed to complying with the requirements of Data Protection legislation and regulations and any personal data created as part of this policy will be processed in accordance with the University’s Data Protection Act procedures. This includes ensuring that data is held securely, is not disclosed unlawfully and is destroyed when no longer needed.
- The University also aims to ensure that users of this policy are aware of Data Protection, Freedom of Information and Records Management issues associated with this policy.

**9. Risk Management Statement**

- Failure to comply with this policy could lead to potential legal action against the University.

**10. Related Policies, Guidelines and University Documents**

This Policy should be read in conjunction with the following University documents, policies and guidance:

- University Disciplinary Policy
- University Grievance Policy
- University Professional Relationships between Employees and Others Policy
- Public Interest Disclosure (Whistleblowing) Policy
- University Student Code of Conduct
- Safeguarding and Prevent – Policy and Procedure
- Office for Students statement of expectations for preventing and addressing harassment and sexual misconduct affecting students in higher education.
- Office for Student guidance on free speech.
- Human Rights Act (1998) and the Equality Act (2010)

**11. Contact Details**

For further information regarding any of the issues covered by this policy please contact:  
 Emma Bales  
 Director of Student Services  
 emma.bales@cumbria.ac.uk  
 University of Cumbria

**UNIVERSITY OF CUMBRIA  
 POLICY DOCUMENT CONTROL SCHEDULE**

<b>REVIEW SCHEDULE</b>				
Review no.	Due date	Reviewed by	Approved by	Completion date
1	14/9/2025			


<b>DRAFTING SCHEDULE</b>	
Draft no.	Date
<i>Eg. 0.1</i>	
<i>0.2</i>	
<i>0.3</i>	
Final Version	
<i>1.0</i>	

## Staff Procedures

### Reporting Channels for Employees

- Where appropriate employees should raise a complaint to their line manager in the first instance. Complaints about a line manager would normally be raised to the next level manager. The relevant manager will liaise with HR to determine whether to make arrangements for an investigation to be undertaken in accordance with the University's Disciplinary Policy and Procedure. The University will aim to deal with all complaints in a fair, balanced and proportionate way.
- The Student Procedures Officer will be notified by the HR Team if the disclosure is against a student and the allegation will be progressed through the Student Code of Conduct and Disciplinary Regulations.
- Any staff member suspecting sexual harassment between a colleague and a student or another stakeholder, is encouraged to report or disclose this to their line manager, or use another appropriate reporting channel as outlined in this policy.

### Investigations into Complaints or Allegations

- Any investigations into allegations of sexual harassment by employees will be conducted under the University's Disciplinary Policy and Procedure. Investigations into allegations of sexual misconduct by students will be conducted under the Student Code of Conduct and Disciplinary Procedure.
- Sexual harassment may also lead to a criminal investigation being instigated into the actions of an employee or student.
- Confidentiality will be maintained as much as possible, subject to any requirement to involve witnesses, or external agencies where a criminal offence may have been committed or where maintaining confidentiality would pose a risk to the person making the report, or to others.

### Support and Advice for Employees

There are many sources of support available to employees prior to making a complaint or to both complainant and alleged perpetrator once a complaint has been made.

These include:

- Line managers as first point of contact.
- HR Business Partners to initially direct staff and managers to the appropriate process and sources of support.
- The Employee Assistance Programme
- A confidential counselling service operated by the Occupational Health provider.
- The chaplaincy service is available and is not dependent on religious belief.
- Union representatives (for union members).
- The University's Equality Diversity and Inclusion Officer

## **Student Procedures –**

### **Reporting Channels**

Students who wish to disclose an issue relating to Bullying Harassment or Sexual Misconduct can use the “Report” tool on the [“You Report, We Support”](#) pages accessed via the Student Hub.

Any disclosures made via “You Report, We Support” will be received into the Student Case Management System, in a confidential closed area.

The reports are automatically workflowed to the Safeguarding Team: Head of Student Support and the MH&WB team.

A member of the Safeguarding Team will contact the student to discuss their welfare, support needs and formal reporting options (both internally and externally)

### **Investigation process**

Where a student wishes to make a formal report through the internal University processes, raising concerns against another student, this will be Investigated and dealt with via the [Student Code of Conduct](#), and [Disciplinary](#) Procedures.

Where a student wishes to make a formal report through the internal University processes, raising concerns against a member of staff, this will be investigated through the relevant HR process.

## **Appendix 1: Definitions**

### **Abuse of power**

An abuse of power is where someone uses their position of power or authority in an abusive and unacceptable manner. Abuse of power can take various forms and may include, but is not limited to manipulation, coercion, or pressuring someone to do something which may be illegal or against the rules, or something which they are not comfortable with. Abuse of power may also occur in the context of a close personal or intimate relationship.

### **Bullying**

Bullying can be defined in many ways but is generally behaviour that is identified as a misuse of power.

According to ACAS guidance, bullying is intimidating, hostile, degrading, humiliating or offensive behaviour, through means which have the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, or humiliating environment. Bullying usually involves a repeated course of conduct.

This may make the recipient feel upset, threatened, humiliated or vulnerable and undermines self-confidence. Bullying behaviour is not necessarily always obvious or apparent to others.

Bullying is not unlawful but harassment based upon any of the characteristics listed in the definition above, is unlawful under the Equality Act 2010.

### **Consent**

Consent is agreeing by choice and having the freedom and capacity to make that choice. The person seeking consent should always take steps to ensure that consent is freely given, that it is informed and recognises that it can be withdrawn at any time.

### **Freedom to consent:**

A person is free to make a choice if nothing negative would happen to them if they said no. For example, a person may not feel free to make a choice if:

- they are being threatened with violence (by the perpetrator and/or by someone else);
- they are being threatened with humiliation;
- they believe that the continuation or assessment of their studies, or progression or advancement of their career, will be at risk if they refused;
- they are being blackmailed;
- there is a significant power imbalance and the party without power feels pressured to continue in the relationship against their will.

### **Capacity to consent:**

Capacity is about whether someone is physically and/or mentally able to make a choice and to understand the consequences of that choice. For example, a person does not have the capacity to give consent if:

- they are drunk or under the influence of drugs - this means someone may still be physically able to have sex but they may not be able to consent;
- they are asleep or unconscious;
- a person may also not have capacity to give consent if they have, for example, a cognitive or learning difficulty, a disability which impairs their speech, or are experiencing a mental health crisis.

### **Disclosure**

Disclosure, for the purposes of this Policy and procedure, involves an individual choosing to tell anyone who is part of the University, about their experience of bullying, harassment or sexual misconduct. Unlike Reporting, Disclosure does not necessarily

trigger an investigation or action (link to relevant section of Safeguarding Policy?), but it would lead to support being offered.

### **Discrimination**

The Equality Act 2010 states that it is against the law to treat any person unfairly or less favourably on the basis of a protected characteristic – see section 4 EDI statement.

### **Grooming**

Grooming can be defined as a gradual process that someone in a position of power uses to manipulate someone to do things they may not be comfortable with and to make them less likely to reject or report abusive behaviour. Grooming will initially start as befriending someone and making them feel special and may result in sexual abuse and/or exploitation.

### **Harassment** as per the [Equality Act 2010](#)

The University of Cumbria defines harassment as unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. The conduct may be persistent or an isolated incident and can be physical, verbal or non-verbal.

The key is that the conduct is viewed as demeaning and unacceptable to the recipient.

### **Reporting**

Reporting is the formal process of informing the University of an incident of bullying, harassment or sexual misconduct experienced or witnessed by an individual for the purposes of seeking support and/or initiating an investigation process under the [Student Code of Conduct and Disciplinary](#) procedures (different from *Disclosure*).

### **Reporting party**

The Reporting Party is the person(s) who witnessed or was subject to the alleged incident of bullying, harassment or sexual misconduct.

### **Responding party**

The Responding Party is the person(s) whose behaviour it is alleged amounted to an incident of bullying, harassment or sexual misconduct.

### **Sexual misconduct**

Sexual misconduct is a form of harassment and is unacceptable behaviour of a sexual nature. It can include: sexual harassment; sexual violence; intimate partner violence; sexual assault; grooming; coercion or bullying with sexual elements; sexual invitations and demands; sexual comments; sexual non-verbal communication; creation of atmospheres of discomfort; and promised resources or advancement in exchange for sexual access.

Offensive acts and behaviours of sexual misconduct that may result in disciplinary action include (this list is illustrative and not exhaustive):

- sexual intercourse or engaging in a sexual act without consent
- attempting to engage in sexual intercourse or engaging in a sexual act without consent
- sharing private sexual materials of another person without consent
- kissing without consent
- touching inappropriately through clothes without consent
- inappropriately showing sexual organs to another person
- repeatedly following another person without good reason
- making unwanted remarks of a sexual nature

An individual can experience sexual harassment from someone of the same or different gender identity or sexual orientation and the recipient of the behaviour decides whether or not it is unwanted.

### **Sexual violence**

A non-legal term used as an umbrella term to refer to and include the different sexual offences of rape, sexual assault by penetration and sexual assault. These are part of the criminal law and are found in the [Sexual Offences Act 2003](#).

### **Rape**

A rape is when a person uses their penis without consent to penetrate the vagina, mouth, or anus of another person. Legally, a person without a penis cannot commit rape, but a female may be guilty of rape if they assist a male perpetrator in an attack.

### **Sexual Assault**

Sexual assault is where one person intentionally touches another person sexually without their consent. The touching can be done with any part of the body or with an object.

### **Assault by penetration**

Assault by penetration is where a person intentionally penetrates the vagina or anus of another person with any part of their body or an object without that person's consent. The penetration has to be sexual.

### **Stalking**

Following a person, watching or spying on them or forcing unwanted contact with the victim through any means, including social media. The effect of such behaviour is to curtail a victim's freedom, leaving them feeling that they constantly have to be careful. In many cases, the conduct might appear innocent (if it were to be taken in isolation), but when carried out repeatedly so as to amount to a course of conduct, it may then cause significant alarm, harassment or distress to the victim.

