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INSEAD Anti-Harassment Policy

June 2025

Category	Compliance
Topic	Anti-harassment
Policy applicable to	Staff, Faculty, Students, Participants, Service Providers
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	Function	Name	Signature
Author	Office of Diversity & Inclusion	N/A	N/A
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Policy Statement

Personal Conduct and Responsibilities Within the INSEAD Community

INSEAD upholds the principle that each individual contributes unique qualities and talents to our community, and everyone deserves respectful treatment. INSEAD is dedicated to fostering an environment where all community members can thrive professionally and academically. This commitment is fundamental to our institutional values of respect, diversity, and excellence.

All INSEAD community members are expected to demonstrate professionalism, integrity, and respect for others' rights, differences, and dignity. These conduct standards apply across all forms of communication—verbal, written, and non-verbal, online and offline. Community members should also handle both INSEAD property and others' belongings with appropriate care and respect.

INSEAD does not tolerate discrimination, bullying, violence, or harassment of any kind and pursues a policy of actively promoting equal opportunities and inclusiveness.”

Scope and Application

This policy applies to all community members—all employees, including faculty and staff, as well as students, participants, fellows, visitors, affiliates, and anyone conducting business with or on behalf of INSEAD. While this policy establishes standards for all community members, the specific remedial measures or disciplinary sanctions applicable will depend on an individual's relationship with INSEAD.

This policy governs conduct while on official INSEAD business including behaviour occurring on school premises, when representing the institution, conducting business on its behalf, or participating in activities funded or sponsored by INSEAD, such as conferences.

The policy also applies to behaviour occurring outside campus when such behaviour:

1. Substantially disrupts the educational or work environment at INSEAD;
2. Violates the rights of other INSEAD community members;
3. Creates a hostile environment that impedes equal access to INSEAD programs, activities, or services;
4. Occurs in the context of INSEAD-affiliated activities or relationships formed primarily through INSEAD connections; or
5. Constitutes harassment, discrimination, or violence that, due to its severity, scope, or persistence, significantly impairs INSEAD's ability to fulfil its educational mission.

INSEAD will exercise this jurisdiction thoughtfully and with respect for individual privacy, focusing on conduct that has a demonstrable connection to the institution's educational and professional environment.

Legal Context

While this policy establishes INSEAD's institutional standards, we recognize that harassment and misconduct matters are also subject to national laws, local regulations, and cultural contexts in the jurisdiction where the alleged conduct occurred.

This policy is informed by the provisions of the French Labor Code, Education Code, Penal Code (particularly Article 222-33), Law No. 2022-299 of March 2, 2022 on combating school and university harassment, and Law No. 2018-703 of August 3, 2018 on strengthening the fight against sexual and gender-based violence, as well as applicable laws in other jurisdictions where INSEAD operates.

Community Responsibilities and Enforcement

Every member of our community shoulders the responsibility to uphold these standards by demonstrating respect for the dignity and integrity of peers and colleagues, actively contributing to a positive work and study environment. We strongly encourage all community members to report behaviours they reasonably believe constitute harassment.

Violations of this policy will result in disciplinary measures proportionate to the nature and severity of the misconduct, administered in accordance with relevant institutional policies and applicable regulations.

Definitions

What constitutes harassment

Harassment is unwelcome conduct that a reasonable person would consider intimidating, hostile, or abusive, and that objectively creates an intimidating, hostile, or offensive environment. Harassment typically involves repeated acts, though certain forms of misconduct—such as serious sexual pressure or severe cyber-harassment—may constitute harassment even as a single incident, in accordance with applicable laws

Examples of conduct that may constitute harassment

- Deliberate and repeated humiliation
- Racial slurs or offensive comments about someone's cultural background
- Spreading harmful rumors or gossip about someone
- Mocking someone's religious beliefs or practices
- Repeatedly making someone feel small or worthless through mean comments or actions
- Unwelcome comments about physical appearance
- Repeated insults about professional competence

Examples of conduct that do not constitute harassment

Normal administrative and academic activities do not constitute, in and of themselves, harassment:

- Setting and communicating performance standards
- Performance reviews (including negative ones)
- Work assignments and decisions
- Changes in work areas or colleagues
- Giving professional feedback
- Having occasional disagreements
- Expressing constructive criticism

Forms of harassment

Psychological harassment

Psychological harassment (also called bullying) consists of repeated negative and destructive verbal or physical behaviours that aim to or result in the degradation of working or study conditions. These repeated actions may damage a person's dignity, physical or mental health, or academic/professional future. Examples include attempts to:

- Prevent expression through constant interruption or silencing
- Damage social relations through exclusion or isolation
- Harm reputation through ridicule or rumors
- Interfere with work by assigning inappropriate tasks or withholding important work
- Create a hostile environment through threats or excessive workload

Sexual harassment

Sexual harassment consists of either: (1) repeated comments or conduct with sexual connotations that harm a person's dignity or create an intimidating, hostile, or

offensive environment; or (2) any form of serious pressure, even if not repeated, exerted with the real or apparent aim of obtaining a sexual act. Sexual harassment can occur in any context related to studies, work, or INSEAD activities, including through electronic communications.

Sexual harassment can manifest in many ways, including:

- Unwanted looks, whistling, or obscene gestures
- Sexual assault or coercion
- Advances or remarks about physical appearance
- Sexist remarks or jokes
- Unsolicited display of pornographic material
- Unwelcome invitations for sexual purposes
- Unwanted physical contact
- Stalking behavior
- Approaches with promises of reward or threats of retaliation

It is also important to distinguish between *flirting* and harassment. While an initial flirting involves respect, and continued flirtation involves mutually desired interaction and respect when interest is not reciprocated, harassment aims to establish a relationship of power and domination. Flirting maintains equal power dynamics and creates acceptable feelings for both parties. In contrast, harassment creates discomfort and fear.

Sexual misconduct

Sexual misconduct encompasses a range of unwelcome behaviour of a sexual nature that is committed without consent or by intimidation, coercion, threat or force. Sexual misconduct includes but is not limited to actual, attempted, or threats of sexual assault and sexual coercion.

Cyber harassment

Cyber harassment is the use of electronic communication to bully, threaten, intimidate, or harm others. While harassment typically requires repeated acts, French law recognizes that in digital environments, even a single communication can constitute harassment if it has the potential for widespread or lasting impact due to its public nature or potential for redistribution. Cyber harassment can occur through various digital platforms and includes behaviours such as:

- Sending threatening or intimidating messages
- Sharing someone's personal information online without consent (doxing)
- Creating fake profiles to impersonate someone
- Repeatedly sending unwanted messages despite requests to stop

- Spreading rumors or false information online
- Encouraging others to harass a target (dogpiling)
- Cyberstalking

Cyberstalking refers to behaviours, including but not limited to:

- Persistently following someone's social media activities without their consent
- Repeatedly monitoring someone's personal online presence in a way that causes distress
- Using digital tools to track their online movements
- Engaging in patterns of unwanted digital observation that intrudes on their privacy

This provision does not apply to INSEAD's legitimate monitoring of institutional digital resources in accordance with applicable policies and laws.

Disciplinary Sanctions

INSEAD will initiate disciplinary sanctions against anyone who has been determined to have harassed another person or to have engaged in behaviours that create an unsafe environment for other members of the community. Such actions and follow-up sanctions will be decided in accordance with applicable INSEAD Codes of Conduct, internal regulations and applicable laws. The INSEAD Open Talk and No Retaliation policy can be accessed [here](#).

The nature of the disciplinary sanctions and/or other remedial measures will depend on the severity of the offense which depends, amongst other things, on the relationship between the parties and on the gravity and or frequency of the alleged harassing behaviour.

The above is without prejudice to possible additional civil, criminal or administrative sanctions decided by local authorities or courts.

As a guiding principle, investigations and disciplinary proceedings shall uphold fair process and respect the rights of all parties. Any individual accused of misconduct shall be informed of the specific allegations and given an opportunity to respond. Investigations shall be conducted by impartial persons with no conflict of interest

Keeping People Safe: Open Talk and No Retaliation Policy

INSEAD will not tolerate any form of retaliation against a complainant, an alleged perpetrator, a witness or anyone involved in the reception of the complaint or

investigation process. Anyone who indulges in retaliatory acts will be subject to disciplinary action.

The institution strictly prohibits retaliation against anyone who reports harassment or participates in an investigation. However, false accusations made with deliberate dishonesty and malicious intent will result in disciplinary action. This does not apply to good-faith reports that cannot be substantiated, which are protected even when allegations cannot ultimately be proven

The INSEAD Open Talk and No Retaliation policy can be accessed [here](#).

Confidentiality

All reports will be taken seriously and treated with confidentiality. When disclosure is deemed necessary for legal or judicial reasons, the concerned parties will be informed.

Miscellaneous

Security and retention of personal data

Personal data related to complaints and investigations under this Policy shall be securely processed and stored using adequate technical and organisational measures.

Personal data will be stored and processed throughout the duration of the respective actions related to this Policy and, beyond their duration, for as long as necessary: (i) for compliance with legal obligations or (ii) for the establishment, exercise, or defense of legal claims. Provided that confidentiality obligations are duly in place, personal data processed in the context of this policy may be shared and/or disclosed within INSEAD's legal entities and with third-party providers. Furthermore, where legally required, personal data may also be shared with / disclosed to competent authorities and other legally foreseen recipients.

Individuals whose personal data is processed in relation to this Policy shall be provided with data protection notices which shall cover all the legally required information under applicable data protection laws, including the rights of data subjects and how they can exercise them. It is important to note that such rights are not absolute and may be limited or restricted in certain circumstances, where there is a legal ground for such limitation or restriction or depending on the applicable legal basis for processing.

Revision

This Policy will be reviewed regularly, and appropriate changes will be made should these be required. This Policy may be amended to ensure compliance with all applicable legislation.

Relevant other INSEAD policies: INSEAD Code of Conduct and Ethics, Open Talk and No Retaliation Policy, Policy on Consensual Romantic and Sexual Relationships.
