

Learning Accord Multi Academy Trust

Bullying and Harassment Policy



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1. Introduction

- 1.1 All employees have the right to work in an environment where they are shown respect and consideration at work, and in which the dignity of every individual is valued.
- 1.2 Accordingly, the academy is committed to the development and promotion of a positive work culture in an environment that is free from bullying and harassment.
- 1.3 Within the work environment all staff will be treated with dignity and respect and in turn are expected to extend this treatment to others, and the aim of this policy is to ensure that staff model appropriate behaviour which shows due respect for all relevant persons, including our students.

2. Purpose and scope

- 2.1 This policy applies to all persons employed in, or by, the academy (which may include volunteers and agency workers) and additionally extends to third parties such as parents or other visitors to our premises.
- 2.2 It covers incidents of bullying and harassment which may occur either on school premises or out of the workplace, such as on business trips or at work-related events or social functions.
- 2.3 The academy will ensure that any allegation of bullying and/or harassment at work is taken seriously, is properly investigated, and is dealt with effectively, sensitively, and speedily.
- 2.4 Employees are encouraged therefore to raise any issues immediately in accordance with this procedure in the knowledge that their concerns will be treated seriously and in confidence.

3. Definitions

- 3.1 The legal position with respect to bullying is complex as there is no single piece of legislation dedicated to addressing the issue of workplace bullying in isolation – however, it is usually interpreted as representing an abuse of power, and although the word ‘bullying’ is not specifically defined in law the following definition is offered by ACAS:

“Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.”

- 3.2 Bullying might represent one element of discriminatory behaviour, or could relate to any one of several legal principles, for example:
 - breach of contract (usually breach of the implied term that an employer will provide reasonable support to employees to ensure that they can carry out their job without harassment and disruption by fellow workers)
 - the common law duty to take care of safety of workers
 - the Employment Rights Act 1996 (for example, constructive or unfair dismissal)
 - the Trade Union and Labour Relations (Consolidation) Act 1992 (dealing with special types of intimidation, etc)
 - protection for whistleblowers (under the Public Interest Disclosure Act 1998).

3.3 Harassment (according to the Equality Act 2010) is defined as:

“unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.”

3.4 Sexual harassment, with relevance to the Worker Protection (Amendment of Equality Act 2010) Act 2023, differs from the above in that it is strictly defined within the legislation as **“unwanted conduct of a sexual nature”** as defined in Section 26(2) of the Equality Act, which has the purpose or effect that is described in the preceding Section 26(1) (namely violating a particular individual’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them).

3.5 Employers should therefore note that sexual harassment is quite distinct from behaviour of a misogynistic nature, which may conceivably represent harassment related to sex but does **not** equate to sexual harassment, as within the meaning of the statute such behaviour is just harassment. To constitute sexual harassment the offending behaviour must involve conduct of a sexual nature and it is only that sort of harassment that employers will have a duty (see below) to take reasonable steps to prevent.

3.6 Relevant protected characteristics which are covered by the above legislation comprise the following:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

3.7 Additionally, the law on harassment is not confined to matters between employees, or between employer and employee. It also covers harassment of an employee by a third party (such as a customer or client, for example, which in the case of a school could be interpreted as a parent) or indeed vice versa.

3.8 An employer may be held liable for incidents that have been repeated, if the employer knows that these have happened and has not taken reasonable steps to stop them recurring.

4. Examples

4.1 Bullying and harassment involve inappropriate abuse of power and may be directed against one or more individuals. This may involve single or repeated incidents ranging from extreme forms of intimidating behaviour, such as physical violence, to more subtle forms such as ignoring someone. This can often occur without witnesses.

4.2 Examples* of bullying and harassment may include (but are not limited to) the following:

- making unwelcome remarks (including jokes at personal expense) or using offensive language (or gossip) about a person's age, dress, appearance, race, marital status, sexuality etc
- unwanted physical contact (including 'horseplay')
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless) or coercion for sexual favours
- isolation or non-cooperation and exclusion from social activities
- pressure to participate in political/religious groups
- personal intrusion from pestering, spying or stalking (including by electronic means) or by failure to safeguard confidential information
- deliberately undermining a competent worker by overloading, or by setting impossible deadlines, or by constant and unwarranted criticism
- misuse (or manipulation) of power or position, including preventing individuals progressing by intentionally blocking promotion or training opportunities

**The above examples are not necessarily limited to personal contact but can also include the use of emails and text messages to third parties, social media content and so on.*

5. Employee responsibilities

- 5.1 Employees have a responsibility to behave in ways which support a non-hostile working environment for themselves and their colleagues.
- 5.2 Employees should be prepared to challenge inappropriate behaviour and to take appropriate action where necessary (by reporting such behaviour to senior management) if they observe (or have other evidence of) harassment, either of themselves or of a third party.
- 5.3 Individuals guilty of harassment can be personally liable to pay compensation and can be prosecuted under criminal as well as civil law.

6. Employer responsibilities

- 6.1 Employer responsibilities may extend to any environment where work-related activities take place. These can include social gatherings organised by the employer such as work parties or outings. An employer could be held liable for events which take place on these occasions unless they can show they took reasonable steps to prevent bullying and/or harassment.
- 6.2 In addition to the above responsibilities, the **Worker Protection (Amendment of Equality Act 2010) Act 2023** (effective from 26 October 2024) places employers under a specific mandatory duty to prevent sexual harassment. This new law creates a positive legal obligation on employers to take proactive steps to stop sexual harassment (which is already unlawful) from happening in the first place.
- 6.3 This shift from reactive to proactive is a significant change, and (whilst the position regarding employers being held liable for third-party harassment remains unchanged) employers can avoid liability if they can show that they took reasonable steps to prevent any sexual harassment from any perpetrator, including third parties such as parents and even members of the public in addition to fellow employees.
- 6.4 The new duty is for the employer to take reasonable steps to prevent sexual harassment of employees **in the course of their employment**. This applies to sexual harassment as

defined in the Equality Act 2010, namely unwanted conduct of a sexual nature. The new duty only applies to sexual harassment and does not extend to harassment based on other protected characteristics (such as, for instance, race, age, sexual orientation or belief).

- 6.5 The new duty does not apply to harassment which is related to sex but which is not **conduct of a sexual nature** (as defined earlier in this policy). Misogynistic behaviour (whilst undoubtedly harassment) does not equate to sexual harassment: to qualify as the latter the offending must involve conduct of a sexual nature, and it is only that specific sort of harassment that employers will have a duty to take reasonable steps to prevent.
- 6.6 To be covered by the new legislation, any sexual harassment must occur 'in the course of employment'. This includes sexual harassment occurring within the workplace, but also extends to sexual harassment occurring at work-related events, such as conferences or social events (whether formal or informal). The duty therefore requires employers to anticipate situations when workers might potentially be exposed to sexual harassment and to take action in advance to prevent this from happening.
- 6.7 Further information on this topic to support managers in complying with their duties can be found within the following appendices:
- Appendix 1 - EHRC guidance on prevention of sexual harassment
 - Appendix 2 - Overall approach to identifying risk factors
 - Appendix 3 - TUC guidance on prevention of sexual harassment
 - Appendix 4 – Risk assessment example using TUC questions.
- 6.8 Senior managers should also be especially aware of 'cyberbullying'. Detrimental texts sent via mobiles or images of work colleagues posted on external websites following work events could amount to bullying or even, potentially, (sexual) harassment. As this would be seen to have its origins in the workplace, the employer could be held liable.
- 6.9 Employers and individuals can be ordered to pay unlimited compensation where harassment involving discrimination has occurred, including the payment of compensation for injury to feelings.

7. Dealing with allegations of bullying and/or harassment

- 7.1 All allegations of bullying and/or harassment should be dealt with promptly.
- 7.2 Some instances may be dealt with internally and informally. In minor cases it may be sufficient for the recipient of harassment to raise the problem with the perpetrator, pointing out the unacceptable behaviour, but should the employee find this too challenging they must instigate formal procedures. Mediation may be used during any stage of these procedures.
- 7.3 If the allegation is directed against the headteacher, the employee should write to the chair of governors detailing their concerns (and may also wish to contact their trade union). The chair of governors should ensure that the concerns are investigated to determine whether further action should be taken.
- 7.4 At any stage of these procedures, both the person making the allegation and the alleged bully or harasser may be accompanied by their trade union representative or a work colleague.

8. Informal procedure

- 8.1 An employee who feels that they are being subjected to bullying and/or harassment should, if possible, keep a record of the incident (or incidents), including date, time, nature of incident(s), and the names of any witnesses.
- 8.2 It is important that employees who feel subjected to bullying and/or harassment raise the issue with an appropriate person at the time the incident (or incidents) occur, in order that matters can be dealt with swiftly and that further potential bullying and/or harassment is prevented.
- 8.3 If the employee feels able, they should raise the problem with the alleged bully or harasser, either verbally or in writing, making it clear that the behaviour is offensive and unwelcome, and asking for it to stop. Alternatively, the issue may be brought to the attention of a line manager who can initially raise the allegations informally on behalf of the person making the allegation.
- 8.4 Where resolution is reached through the informal stage of the process, with the acceptance of both parties, a copy of the outcome should be provided to both and a further copy placed in their personal files.
- 8.5 Where resolution cannot be achieved through the informal stage, an employee can pursue an allegation through the formal stage of the process.

9. Mediation

- 9.1 This represents a further informal option, whereby a meeting may be arranged in the presence of a mediator who will give both parties an opportunity to express their respective viewpoints in the hope of brokering a mutually acceptable solution. However, this option can only proceed in the event of both parties being agreeable, and cannot be imposed on any individual.
- 9.2 Any discussions which take place during mediation remain confidential and 'without prejudice' and may not be used by either party in any subsequent internal or external process unless this is with the explicit consent of all parties.

10. Formal procedure

- 10.1 If an employee wishes to make a formal allegation of bullying and/or harassment, they should submit this in writing to either their line manager or the headteacher. In circumstances where the alleged perpetrator is the individual's line manager the allegation should be submitted to the next senior manager (or to the headteacher).
- 10.2 If the allegation relates to the headteacher then it should be submitted in writing to the chair of governors (and in such circumstances the chair of governors will normally, throughout the formal procedure as described in the following clauses, perform the role more usually undertaken by the headteacher).
- 10.3 The line manager or headteacher will acknowledge receipt of the formal allegation in writing within 5 working days. This letter should outline: the next steps to be taken; information on any sources of support that may be available; and should also (where applicable) identify by name any investigating officer appointed to look into the matter.
- 10.4 The line manager or headteacher (or investigating officer if applicable) will then undertake an investigation, which must be carried out with due regard to the need for a swift conclusion

and which should normally take no more than three to four weeks from the date of initial submission of the allegation.

- 10.5 The line manager or headteacher (or investigating officer if applicable) will keep both parties informed of the progress of the investigation, including any necessary alteration to the above timescale. Should a counter-allegation be received from the alleged bully or harasser, this will be dealt with as part of the same investigation.
- 10.6 At any stage of the formal procedure the individual who has submitted the allegation may decide that they wish to attempt to resolve the situation through an informal approach instead. They will be supported in this decision wherever possible.
- 10.7 However (the preceding clause notwithstanding), the line manager or headteacher has a duty of care to manage allegations appropriately. If they deem informal resolution inappropriate due to the seriousness of the allegation, or they perceive that an employee may be at serious risk, they should continue with formal action.

11. Investigation

- 11.1 In certain circumstances the line manager or headteacher may take precautionary action which could involve either temporary redeployment or suspension of the alleged bully or harasser (as a non-judgemental and neutral act) to allow the matter to be investigated fully.
- 11.2 The alleged perpetrator will be informed of the allegations made against them. The line manager or headteacher (or investigating officer if applicable) will then interview, and obtain signed statements from, both the person making the allegation and the alleged perpetrator. Interviews may also be held with any witnesses to the alleged incident(s) of bullying and/or harassment.
- 11.3 The questions asked in the course of the investigation will be crucial to establishing the facts. Prior to conducting interviews, the line manager or headteacher (or investigating officer if applicable) should prepare a list of proposed questions (which may be either open or closed). Consideration should also be given to those areas where it could be anticipated that supplementary questions may be required.
- 11.4 The scope of the investigation should include attempts to establish the facts by addressing (amongst others) the following questions:
 - what allegation(s) or incident(s) are being investigated and what academy policy has potentially been breached?
 - when did the alleged incident(s) take place?
 - where did the alleged incident(s) happen?
 - who was involved in (or witnessed) the incident(s)?
 - why has the incident or behaviour created a problem?
 - was the incident or behaviour reported to anyone at the time of occurrence?
- 11.5 During the interview, the line manager or headteacher (or investigating officer if applicable) should take time to consider the responses provided, and where these appear unclear or inconsistent should seek clarification.
- 11.6 All sensitive information will be treated confidentially in accordance with the requirements of data protection legislation.

- 11.7 The investigating officer (where applicable) will, on completion of their investigation, prepare an impartial written report for presentation to the line manager or headteacher who commissioned the investigation.
- 11.8 The findings of the investigation report will form the basis of the decision of the line manager or headteacher as to whether further action should be taken. Should the line manager or headteacher conclude that there is still insufficient detail on which to base their decision the investigating officer may be asked to seek further information and/or clarification.
- 11.9 Following completion of the investigation there are three possible outcomes (as detailed below).

12. Outcomes

- 12.1 The three possible outcomes are as follows:

i. Allegation not upheld

If it is decided that there is no case to answer, support will be provided for both parties, with additional consideration being given to managing their ongoing working relationship. In certain circumstances (but only where practical, normally in larger organisations) this might include the voluntary transfer of either of the employees concerned.

ii. Evidence of unacceptable behaviour that may be dealt with informally

In some cases, where bullying/harassment is substantiated but does not warrant disciplinary action, it may still be possible to agree an acceptable resolution. For example, the manager may address the situation through supervisory processes (counselling, advice, instruction, training and/or support) and make it clear that ongoing monitoring will be undertaken. The manager must make it clear to the employee that their behaviour is unacceptable and that further similar instances may lead to disciplinary action.

iii. Disciplinary action

Where an investigation concludes that there is sufficient evidence of unacceptable conduct, it will be necessary to commence disciplinary proceedings in accordance with the academy's disciplinary policy.

- 12.2 Once the investigation is completed, the outcome should be set out in a written communication to be provided to both the individual who has made the allegation **and** the subject of that allegation.

13. Malicious allegation

- 13.1 If it transpires, following appropriate investigation, that the allegation of harassment/bullying was malicious then the individual who has made the allegation may be dealt with under the academy's disciplinary policy.

14. Appeal process

- 14.1 Should the person making the allegation be dissatisfied with the outcome of the process they have a right of appeal against the decision.
- 14.2 They should submit their grounds for appeal in writing to the line manager or headteacher (or to the chair of governors if the headteacher was the alleged perpetrator) within five working days of receiving formal notification of the decision.
- 14.3 Appeals will be heard no later than ten working days from the date of the appeal letter being submitted. Appeals will be undertaken by a governor review panel with no less than two governors, who must have had no previous involvement in the matter.
- 14.4 The decision of the appeal committee is final, and this represents the conclusion of the process.

15. Other policies and procedures

- 15.1 This policy will be supported by the following policy and procedures:
 - Disciplinary Policy

Appendix 1: Summary guidance from the Equality and Human Rights Commission

Prevention of sexual harassment in the workplace

The overall guidance from the Equality and Human Rights Commission (EHRC) states that an employer must assess and take steps to reduce risk in their workplace to help employers meet their obligations under the Worker Protection (Amendment of Equality Act 2010) Act.

A summary of the steps taken from that guidance appears below, in a format that may be provided to management as an aide memoire to support them in complying with the legislation by use as a checklist to ensure that all relevant areas are covered.

Engage staff

Conduct regular one-to-ones, run staff surveys and exit interviews, and have open door policies.

Make sure that all workers are aware of:

- how they can report sexual harassment
- their employer's sexual harassment policy
- the consequences of breaching that policy

Risk assessment

Undertaking a risk assessment will help an employer to comply with the preventative duty.

A risk assessment should consider the following factors:

- where are the power imbalances?
- is there a lack of diversity in the workforce?
- is there job insecurity for a particular group or role?
- are staff working alone and/or at night?
- do staff have customer-facing duties?
- are customers or staff drinking alcohol?
- are staff expected to attend external events, conferences or training?
- do staff socialise outside of work?
- do staff engage in crude or disrespectful behaviour at work?

Reporting

Explain clearly to all workers:

- what is considered acceptable behaviour
- how to recognise sexual harassment
- what to do if they experience or witness unacceptable behaviour or sexual harassment

Management should keep centralised, confidential records of all concerns raised, whether formal or informal. This enables trends to be identified.

Training

All staff, including managers/senior staff, should be trained on:

- what sexual harassment in the workplace looks like

- what to do if they experience or witness it
- how to handle any complaints of harassment

In industries where third-party harassment from customers is more likely, workers should also be trained on how to address these issues.

An employer should review the effectiveness of any training and offer refresher sessions at regular intervals.

What to do when a harassment complaint is made

Management must act immediately to resolve the complaint, following the organisation's harassment policy and taking into account how the worker wants the issue to be resolved. The confidentiality of all parties must be respected at all times.

Management must protect the complainant from ongoing harassment or being victimised during an investigation, for example, by moving the alleged harasser to another team or site where this is practical. Witnesses to sexual harassment should be similarly protected.

Dealing with harassment by third parties

Harassment by a third party, such as a student or client, should be treated just as seriously as that by a colleague, and employers should take steps to prevent this type of harassment, including putting reporting mechanisms in place or assessing high-risk workplaces where staff might be left alone with potential perpetrators.

Monitoring and evaluation

It is important to regularly evaluate the effectiveness of the steps put in place to prevent sexual harassment in the workplace and to implement any changes arising from that process. This will help an employer in complying with the preventative duty and protecting staff from sexual harassment.

Methods of evaluating the effectiveness of the steps could include:

- reviewing informal and formal complaints data to see if there are any trends or particular issues
- surveying staff anonymously on their experiences of sexual harassment, including whether they have witnessed or been subjected to harassment, whether they have or would in the future report it (and if not, why not) and what further steps they think the employer could take
- holding lessons-learned sessions after any complaints of sexual harassment are resolved.

Appendix 2: Overview of an employer's initial approach to preventing sexual harassment

Risk factor	Risk factor strategies to reduce harassment	Notes/commentary
Younger employees may be more susceptible to being taken advantage of by colleagues or superiors, particularly those who may be older and more established in their positions.	Provide orientation to all new employees with emphasis on the employer's desire to hear about all complaints of unwelcome conduct. Provide training on how to be a good supervisor when young staff are promoted to positions of influence/staff management	
Management may be reluctant to jeopardise a high value employee's economic value to the employer. High value employees may perceive themselves as exempt from workplace rules or immune from consequences of their misconduct.	Apply workplace rules uniformly, regardless of the position or value to the employer	
Employees in the minority can feel isolated and may actually be, or at least appear to be, vulnerable to pressure from others.	Increase diversity at all levels of the workforce, with particular attention to work groups with low diversity Pay attention to relations among and within work groups	
Abusive remarks or humour may promote workplace norms that devalue certain types of individuals.	Proactively and intentionally create a culture of civility and respect with the involvement of the highest levels of leadership.	
Harassers have easy access to their targets, especially where there are no witnesses	Consider restructuring work environments and schedules to eliminate isolated conditions. Ensure that employees in isolated work environments understand internal procedures eg grievance	
Alcohol reduces social inhibitions and impairs judgment.	Remind managers about their responsibility if they see harassment, including at work and at out of hours work events where alcohol is consumed. Intervene promptly when external people who have consumed too much alcohol act inappropriately.	

Appendix 3: TUC guidance document – checklist for preventing sexual harassment

The following is guidance set out (for their union representatives) by the TUC to ensure that organisations protect staff and workers from sexual harassment. Although written in 2021, it will serve to help managers in meeting the new requirements arising from the Worker Protection (Amendment of Equality Act 2010) Act which places employers under a mandatory duty (from October 2024) to prevent sexual harassment.

Extract taken from the TUC document:

Findings from the confidential climate survey should inform the completion of the checklist as workers will have a clear idea of the risks and how they can be avoided or reduced

In summary

- examine the work and workplace to identify what factors could put people at risk
- think about structures – abuse of power is at the root of sexual harassment
- assess the chance, high or low, that somebody could be harmed by the factors identified – any factor that increases the opportunity for sexual harassment to happen should be addressed but assessing the chance will help you decide how to prioritise action
- on the basis of this assessment, decide what prevention or control measures should be taken to prevent the possibility of harm.

Consider the following areas/questions and consider the answer (yes or no) to the questions, the level of risk (low, medium, high) and possible preventative action and a review of actions taken. You may wish to review the questions and relevance to your own school or academy and create a table with headings.

People

Are particular groups being placed in certain environments, are there any patterns between characteristics and working environment eg women, young people, disabled, LGBT etc?

Working environment

Do staff report a culture of banter or casual sexism which is hard to challenge?

Do members of staff work alone or in isolated workplaces?

Specifically, do members of staff work alone at night?

Do staff interact with third parties (eg contractors or members of the public) at work?

Are staff expected to work with third parties alone?

Do members of staff have to leave their main place of work often for work-related activities?

Are there certain members of staff who are often placed on lone shifts or shifts with only one other member of staff?

Do staff members work in high-pressured competitive or stressful environments?

Is alcohol consumed while staff are working (by staff or third parties)?

Are members of staff expected to socialise with third parties eg, at events or conferences with contractors or clients?

Outside working environment

Do staff often socialise?

Is alcohol present when staff socialise?

Is there a requirement for staff to attend work related events outside of work where alcohol is present?

Management structures and reporting process

Are there strong hierarchies in the workplace with some people who have a lot more power than others?

Do staff members have limited networks or not many ways of interacting with more than one line manager?

Does the workforce have a lack of diversity? Or is it segregated amongst vertical and horizontal occupations and levels?

Does the leadership and management of your organisation have a lack of diversity? Think of key characteristics such as class, ethnicity, disability and gender.

How are decisions regarding ways of working, working patterns, shifts etc decided across your organisation? Is there a consistent and/or formal approach across different teams or is the approach more informal?

Who has responsibility for deciding hours, working patterns or rotas?

Is there clear signposting to staff on who they can talk to, besides their line manager, if they are having issues at work?

Do staff members know who the trained people are that they can report an incident of sexual harassment to?

Do staff members know the informal reporting process for sexual harassment?

Do staff members know the formal reporting process for sexual harassment?

Do freelancers, agency workers and self-employed contractors have access to safe reporting mechanisms and know who they can report directly to?

Do staff members know what sexual harassment is?

Do informal and anonymous reports of sexual harassment outnumber formal reports made to the management team? Low rates of formal reporting can be a sign of distrust in management and in the reporting measures; this is why we recommend conducting regular climate surveys.

Within the organisation, how many reports of sexual harassment are the management team aware of in the last three years?

Are there any trends or hotspots in the management team's records of sexual harassment reports over the last three years?

Appendix 4: Example questions for a risk assessment layout (based on TUC questions)

Question	Yes/No	Level of risk (L/M/H)	Preventative Action	Review/monitoring outcome
Do staff report a culture of banter or casual sexism which is hard to challenge?				
Do members of staff work alone or in isolated workplaces?				
Are there procedures in place such as appraisals or job chats where we can gauge workplace environment and identify issues?				
Are members of staff expected to socialise with third parties eg, at events or conferences with contractors or clients?				
Do staff members know who the trained people are that they can report an incident of sexual harassment to?				
Do staff members know the informal reporting process for sexual harassment?				
Are there strong hierarchies in the workplace with some people who have a lot more power than others?				
Is there clear signposting to staff on who they can talk to, besides their line manager, if they are having issues at work?				