STAFFPOWER GROUP

RECRUITMENT & TRAINING

Prevention of Bullying & Harassment Policy

| Version 4.1 |

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1. Introduction

Staff Power Training (SPT) is committed to providing a safe, respectful, inclusive and supportive environment for all learners, staff, visitors, contractors and stakeholders.SPT recognises that bullying, harassment and victimisation can have a significant impact on an individual's wellbeing, mental health, confidence, learning and work performance. Such behaviour is unacceptable and will not be tolerated in any form. SPT is committed to promoting dignity, equality, diversity and mutual respect and will take all allegations of bullying and harassment seriously, ensuring they are investigated promptly, fairly and confidentially.

All learners, staff and visitors have the right to study, work and participate in SPT activities free from bullying, harassment, discrimination and victimisation. Equally, everyone is expected to contribute to creating and maintaining a positive environment where people are treated with courtesy, respect and consideration. Where bullying or harassment is identified, SPT will take appropriate action to support those affected, address unacceptable behaviour and, where necessary, implement disciplinary, safeguarding or other corrective measures.

2. Scope

This policy applies to all learners, employees, agency workers, contractors, volunteers, visitors and any other individuals engaged in activities delivered by or on behalf of Staff Power Training (SPT).

The policy applies to behaviour that occurs:

- On SPT premises.
- During training, learning and assessment activities.
- During work placements, employer-based learning and external visits.
- At events organised or delivered by SPT.
- Within online learning environments.
- Through digital communications, including email, messaging applications and social media platforms, where the behaviour impacts learners, staff or the wider SPT community.

SPT recognises that bullying and harassment can occur both in person and online. Incidents that occur outside of normal learning or working environments may still be addressed under this policy where there is a connection to SPT activities or where the wellbeing, safety or dignity of learners, staff or others has been affected.

This policy should be read alongside SPT's Safeguarding Policy, Equality, Diversity and Inclusion Policy, Learner Behaviour Policy, Complaints Procedure and other related organisational policies and procedures.

3. Roles and Responsibilities

Learners

Learners are expected to:

- Treat others with dignity, respect and consideration.
- Refrain from any form of bullying, harassment, discrimination or victimisation.

- Report incidents or concerns promptly to a member of staff.
- Cooperate fully with any investigations.
- Support the creation of a safe and inclusive learning environment.

Staff
Staff are responsible for:
- Promoting a culture of respect, inclusion and positive behaviour.
- Challenging inappropriate behaviour where it is safe and appropriate to do so.
- Taking all reports of bullying and harassment seriously.
- Recording and reporting concerns in line with this policy and safeguarding procedures.
- Supporting individuals affected by bullying or harassment.

Managers
Managers are responsible for:
- Ensuring this policy is implemented consistently and fairly.
- Investigating complaints or appointing an appropriate investigator.
- Maintaining accurate records of concerns, investigations and outcomes.
- Taking appropriate action where bullying or harassment is identified.
- Providing support and guidance to staff involved in managing cases.

Designated Safeguarding Lead (DSL) and Safeguarding Team
The Designated Safeguarding Lead and Safeguarding Team are responsible for:
- Assessing whether reported incidents present a safeguarding risk.
- Coordinating safeguarding responses where required.
- Making referrals to external agencies where appropriate.
- Monitoring trends, risks and recurring concerns.
- Supporting learners affected by bullying, harassment or discrimination.

Senior Leadership Team
The Senior Leadership Team is responsible for:
- Promoting a zero-tolerance approach to bullying and harassment.
- Ensuring adequate resources, training and support are available.
- Reviewing incident data and monitoring the effectiveness of this policy.
- Ensuring compliance with safeguarding and equality legislation.

4. Objectives

- To define what is meant by bullying/harassment.
- To make staff and learners aware of possible signs of bullying/harassment, and their responsibility in reporting.
- To ensure that teaching, support staff and learners are aware that incidents of bullying/harassment will be fully followed up and not tolerated.

5. Definition and examples of bullying/harassment

Bullying

Bullying is unwanted behaviour by an individual or group that is intended to hurt, intimidate, humiliate, undermine or distress another person. Bullying may be repeated over time or involve a serious one-off incident that has a significant impact on an individual.

Examples of bullying may include:

- Verbal abuse, insults or name-calling.
- Threatening, intimidating or aggressive behaviour.
- Spreading rumours or malicious gossip.
- Deliberately excluding someone from activities or groups.
- Persistent criticism designed to undermine confidence.
- Physical intimidation, assault or damage to property.
- Humiliation or ridicule in person or online.

Harassment

Harassment is unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Harassment can occur because of a protected characteristic or for other reasons and may be intentional or unintentional.

Examples of harassment may include:

- Offensive comments, jokes or remarks.
- Mocking an individual's appearance, beliefs or personal circumstances.
- Displaying offensive or discriminatory materials.
- Unwanted comments or behaviour that causes embarrassment or distress.
- Intimidation, coercion or deliberate exclusion.

Cyberbullying

Cyberbullying is bullying or harassment that takes place through electronic or digital means.

Examples include:

- Sending abusive, threatening or offensive messages.
- Posting harmful comments on social media.
- Sharing images, videos or personal information without consent.
- Creating fake accounts to harass or embarrass someone.
- Deliberately excluding individuals from online groups or activities.

Victimisation

Victimisation occurs when a person is treated unfairly or subjected to a detriment because they have reported bullying, harassment or discrimination, supported a complaint, or participated in an investigation. Victimisation will not be tolerated and may lead to disciplinary action.

6. Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment may occur regardless of gender, sexual orientation, age, disability, ethnicity, religion or belief, and can occur between learners, staff, visitors or any other individuals associated with SPT activities.

Examples of sexual harassment may include:

- Unwanted sexual comments, jokes or remarks.
- Sexually suggestive language or gestures.
- Inappropriate comments about a person's appearance or body.
- Unwanted physical contact or touching.
- Sharing, displaying or sending sexual images, videos or messages.
- Unwanted advances or repeated attention after requests to stop.
- Online sexual harassment through social media, messaging platforms or other digital communication channels.

Any allegation of sexual harassment will be treated seriously and investigated promptly, fairly and sensitively.

Where sexual harassment presents a safeguarding concern, involves criminal behaviour or places an individual at risk of harm, SPT will follow safeguarding procedures and may refer the matter to external agencies, including the Police, Local Authority or other appropriate services.

Individuals affected by sexual harassment will be offered appropriate support throughout the reporting, investigation and outcome process.

7. Understanding bullying/harassment & discrimination

Bullying, harassment and discrimination are distinct but closely related behaviours that can have a significant impact on an individual's wellbeing, confidence, learning and working environment. Staff Power Training (SPT) is committed to preventing and addressing all forms of such behaviour.

Under the Equality Act 2010, it is unlawful to discriminate against individuals because of a protected characteristic. The protected characteristics are:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race.
- Religion or belief.
- Sex.
- Sexual orientation.

Discrimination occurs when an individual is treated less favourably because of a protected characteristic. Discrimination may be direct or indirect and may occur

intentionally or unintentionally.

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation occurs when an individual is treated unfairly because they have made, supported or participated in a complaint relating to bullying, harassment or discrimination.

Whilst bullying is not specifically defined in law, some forms of bullying may constitute harassment, discrimination, a safeguarding concern, or in certain circumstances, a criminal offence.

Where incidents are motivated by prejudice relating to an individual's actual or perceived protected characteristics, they may be considered hate incidents or hate crimes and will be treated seriously by SPT.

8. Equality and Diversity

Staff Power Training (SPT) is committed to promoting equality of opportunity and valuing diversity across all aspects of its provision. SPT seeks to ensure that all learners, staff, visitors and stakeholders are treated fairly, with dignity and respect, and are able to participate fully in learning and working activities.
SPT will not tolerate discrimination, harassment, victimisation or bullying on the grounds of any protected characteristic as defined by the Equality Act 2010.
SPT is committed to ensuring that no individual is disadvantaged, excluded or treated less favourably because of their:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race, ethnicity or nationality.
- Religion or belief.
- Sex.
- Sexual orientation.

SPT recognises that diversity strengthens the organisation and enriches the learning and working environment. Diversity includes the wide range of backgrounds, experiences, perspectives, cultures, skills and characteristics that individuals bring to the organisation.

SPT is committed to creating a culture in which diversity is respected, valued and celebrated. Individuals are encouraged to contribute positively to learning, working and organisational life, free from prejudice, stereotyping, discrimination or bias.
Any incident of discrimination, harassment, victimisation or prejudice-related bullying will be treated seriously and investigated in accordance with this policy. Where

appropriate, incidents may also be addressed through safeguarding procedures, disciplinary processes or referral to external agencies.

Through training, awareness raising, policy development and positive role modelling, SPT will promote equality, challenge discriminatory attitudes and behaviours, and foster an environment where everyone is treated fairly and with respect.

9. Inclusion

Staff Power Training (SPT) is committed to creating and maintaining an inclusive environment in which all learners, staff, visitors and stakeholders feel welcomed, respected, supported and able to participate fully in learning, working and organisational activities.

SPT recognises that inclusion goes beyond equality of opportunity and valuing diversity. Inclusion is about creating a culture where every individual feels a sense of belonging, is treated with dignity and respect, and has the opportunity to contribute, develop and achieve their full potential.

SPT is committed to identifying and removing barriers that may prevent individuals from participating fully in education, training, employment or other organisational activities. Where appropriate, reasonable adjustments and additional support will be considered to ensure equitable access, participation and achievement.

SPT believes that an inclusive culture is created through positive relationships, mutual respect, open communication and a shared commitment to supporting one another. Everyone associated with SPT has a responsibility to contribute to an environment where differences are respected and individuals feel safe, valued and heard.

All learners, staff and visitors are expected to:

- Treat others with dignity, courtesy and respect.
- Value and respect different backgrounds, experiences and perspectives.
- Challenge inappropriate behaviour where it is safe and appropriate to do so.
- Promote positive relationships and a culture of belonging.
- Contribute to a safe, supportive and inclusive environment.

SPT will promote inclusion through training, awareness raising, learner engagement, staff development and positive role modelling. Any behaviour that undermines inclusion, including bullying, harassment, discrimination or victimisation, will be addressed promptly and appropriately in accordance with this policy.

SPT is committed to fostering an environment where every individual feels respected, valued and empowered to participate fully and achieve success, regardless of their background, identity, personal circumstances or individual needs.

10. Prevention of Bullying and Harassment

Staff Power Training (SPT) is committed to preventing bullying, harassment, discrimination and victimisation through a proactive approach that promotes respect, dignity, inclusion and positive behaviour.

SPT recognises that creating and maintaining a safe, supportive and inclusive environment is the responsibility of everyone within the organisation. Bullying and harassment are less likely to occur where positive relationships, mutual respect and clear behavioural expectations are actively promoted.

To prevent bullying and harassment, SPT will:

- Promote a culture of dignity, respect and inclusion throughout all learning and working environments.
- Raise awareness of this policy through inductions, training, communications and learner engagement activities.
- Provide staff with appropriate training and guidance to identify, challenge and respond to bullying and harassment.
- Encourage learners, staff and visitors to report concerns at the earliest opportunity.
- Promote equality, diversity and inclusion through learning activities, awareness campaigns and positive role modelling.
- Foster a culture in which individuals feel safe to raise concerns without fear of retaliation or victimisation.
- Monitor incidents of bullying and harassment to identify trends, risks and opportunities for improvement.

SPT will take all reports of bullying and harassment seriously and will respond promptly, fairly and sensitively. Where appropriate, support will be provided to those affected, and action will be taken to address unacceptable behaviour.

SPT is committed to continuous improvement and will regularly review its practices, training and support mechanisms to ensure they remain effective in preventing bullying and harassment and promoting a positive organisational culture.

11. Safeguarding Considerations

Staff Power Training (SPT) recognises that some incidents of bullying, harassment, discrimination and victimisation may also constitute safeguarding concerns. All reports will be assessed to determine whether additional safeguarding action is required.
Bullying or harassment may become a safeguarding concern where:

- Physical harm, assault or threats of violence have occurred.
- Sexual harassment, sexual abuse or sexual violence is alleged.
- The behaviour involves coercion, exploitation or intimidation.
- The incident is motivated by prejudice, hate or discrimination.
- Online behaviour places an individual at risk of harm.

- There are concerns regarding an individual's mental health, emotional wellbeing or risk of self-harm.
- The individual is considered vulnerable or at risk due to their age, disability, personal circumstances or other factors.

Where a safeguarding concern is identified, the matter will be referred to the Designated Safeguarding Lead (DSL) or a member of the Safeguarding Team without delay. Appropriate action will be taken in accordance with SPT's Safeguarding Policy and associated procedures.

SPT may, where appropriate, seek support from or make referrals to external agencies, including Children's Social Care, Adult Social Care, the Police or other relevant statutory services.

The welfare and safety of individuals involved will remain a priority throughout any investigation, and appropriate support will be offered to those affected.

12. Procedures for dealing with complaints of bullying/harassment

Staff Power Training (SPT) encourages individuals to report concerns about bullying, harassment, discrimination or victimisation as soon as possible. All complaints will be taken seriously and handled fairly, sensitively and, where possible, confidentially. Concerns may be reported by:

- Learners.
- Staff.
- Visitors.
- Parents, carers or representatives, where appropriate.

Individuals may report concerns to:

- A member of staff.
- Their line manager.
- A member of the safeguarding team.
- A member of the senior leadership team.

Upon receiving a complaint, SPT will:

- Listen to and record the concern appropriately.
- Assess whether there are any immediate safeguarding or welfare risks.
- Determine the most appropriate course of action.
- Provide information about available support.
- Investigate concerns where necessary in accordance with this policy.

SPT recognises that some complaints may be resolved informally, while others may require a formal investigation. The appropriate route will be determined by the nature, seriousness and circumstances of the allegation.

No individual will be disadvantaged, victimised or treated unfairly for raising a concern, making a complaint or participating in an investigation in good faith. Any form of retaliation or victimisation will be treated as a serious matter and may result in disciplinary action.

Complaints will normally be managed through one of the following stages:

- Informal Stage.
- Formal Stage.

13. Confidentiality

Staff Power Training (SPT) will handle all reports of bullying, harassment, discrimination and victimisation as confidentially as possible. Information relating to complaints will only be shared with those who have a legitimate need to know in order to investigate concerns, provide support, fulfil safeguarding responsibilities or comply with legal and regulatory obligations.

All individuals involved in a complaint, including complainants, witnesses and those subject to allegations, are expected to respect the confidentiality of the process and refrain from discussing matters with others unnecessarily.

SPT will take reasonable steps to protect the privacy, dignity and wellbeing of all parties involved throughout the reporting, investigation and outcome process.

Whilst confidentiality will be respected wherever possible, it cannot be guaranteed where:

- There are safeguarding concerns.
- There is a risk of harm to an individual or others.
- Criminal activity is suspected or alleged.
- Disclosure is required by law, regulation or other statutory obligations.

Where information must be shared, SPT will ensure that disclosure is proportionate, appropriate and limited to those who need the information in order to fulfil their responsibilities.

Records relating to complaints, investigations and outcomes will be maintained securely and managed in accordance with SPT's Data Protection Policy and applicable data protection legislation.

14. Timescales

SPT aims to address complaints promptly and fairly. While timescales may vary depending on the complexity of the case, SPT will normally:

- Acknowledge receipt of a complaint within 2 working days.
- Conduct an initial assessment as soon as practicable.
- Commence any formal investigation without unreasonable delay.
- Keep all parties informed of progress throughout the process.

- Communicate outcomes as soon as reasonably possible following completion of the investigation.

SPT will normally seek to conclude formal investigations within 20 working days of the complaint being received. Where this is not possible due to the complexity of the case, availability of witnesses or other exceptional circumstances, all parties will be kept informed of progress and provided with revised timescales.

Where immediate safeguarding concerns are identified, action may be taken outside of these timescales to protect the safety and wellbeing of those involved.

15. Informal stage

Individuals who believe they have experienced bullying, harassment, discrimination or victimisation are encouraged, where they feel safe and comfortable to do so, to make the individual(s) aware that their behaviour is unwanted and unacceptable. In some cases, concerns can be resolved quickly and effectively through informal discussion and early intervention.

The purpose of the informal stage is to provide an opportunity to resolve issues at the earliest opportunity without the need for a formal investigation. However, no individual will be expected to confront another person if they do not feel comfortable doing so.

Individuals may seek support from:

- A member of staff.
- A line manager.
- A member of the Safeguarding Team.
- A member of the Senior Leadership Team.

Where appropriate, a member of staff, manager or safeguarding representative may support or facilitate informal discussions between those involved in an attempt to reach a positive resolution.

Informal actions may include:

- A discussion with the individual concerned.
- Facilitated conversations.
- Restorative approaches.
- Mediation, where appropriate and agreed by all parties.
- Agreement of expected standards of behaviour moving forward.

Where concerns involve serious allegations, safeguarding risks, discrimination, sexual harassment, threats, violence or repeated incidents, SPT may determine that the matter should proceed directly to the formal stage without an informal resolution being attempted.

Records of informal concerns and agreed actions may be maintained where appropriate to support monitoring, safeguarding and future decision-making.

16. Formal stage

A formal complaint may be raised where:

- The informal stage has not resolved the matter.
- The individual does not feel comfortable pursuing an informal resolution.
- The allegation is serious in nature.
- There are safeguarding concerns.
- The behaviour is repeated, persistent or has had a significant impact on the individual concerned.

Formal complaints should be submitted in writing and include, where possible:

- Details of the incident(s).
- Dates, times and locations.
- The name(s) of the person(s) involved.
- Details of any witnesses.
- Any supporting evidence available.
- The impact the behaviour has had on the individual.

Upon receipt of a formal complaint, SPT will appoint an appropriate member of staff to review and investigate the matter. The investigator will seek to establish the facts by gathering evidence, speaking to those involved and considering any relevant records or documentation.

The complainant and the person against whom the allegation has been made will each be given an opportunity to provide their account of events and submit any relevant information.

During the investigation, SPT will:

- Act fairly and impartially.
- Maintain confidentiality wherever possible.
- Consider any safeguarding concerns.
- Keep appropriate records.
- Provide support to those involved where required.

Where necessary, statements may be obtained from witnesses and additional evidence gathered to ensure a thorough and balanced investigation.

Following completion of the investigation, SPT will determine whether the complaint is:

- Substantiated.
- Partially substantiated.
- Not substantiated.
- Unfounded or malicious.

Both parties will be informed of the outcome and any actions to be taken, subject to confidentiality and data protection requirements.

Where bullying, harassment, discrimination or victimisation is found to have occurred, appropriate action will be taken in accordance with relevant organisational policies and procedures. This may include safeguarding interventions, behavioural measures, disciplinary action, suspension, exclusion or referral to external agencies where appropriate.

17. Responding to Instances of Bullying, Harassment or Discrimination

Following the conclusion of an investigation, SPT will determine the most appropriate response based on the nature, severity and impact of the incident, the evidence available and any identified safeguarding concerns.

The welfare, safety and wellbeing of all individuals involved will be considered when determining appropriate actions and outcomes.

Potential outcomes may include:

No Further Action

Where there is insufficient evidence to substantiate the allegation, or where the complaint is not upheld, no further formal action may be taken. Support may still be offered where appropriate.

Informal Resolution

Where appropriate, concerns may be resolved through:

- Informal discussion.
- Restorative approaches.
- Agreed behavioural expectations.
- Targeted support and guidance.

Mediation

Where all parties agree and it is considered appropriate, mediation may be used to help rebuild relationships and achieve a positive resolution. Mediation will not normally be used where there are safeguarding concerns, serious misconduct allegations or significant power imbalances.

Behavioural and Support Interventions

Actions may include:

- Behaviour improvement plans.
- Additional supervision or monitoring.
- Safeguarding support.
- Wellbeing or mental health support.
- Referral to internal support services.
- Referral to external support agencies.

Disciplinary Action

Where bullying, harassment, discrimination or victimisation is substantiated, disciplinary action may be taken in accordance with relevant organisational procedures. This may include:

- Formal warnings.
- Suspension.
- Removal from activities.
- Permanent exclusion.
- Other appropriate sanctions.

Referral to External Agencies
Where appropriate, SPT may refer matters to:

- The Police.
- Children's Social Care.
- Adult Social Care.
- Local Authority services.
- Other relevant agencies.

Ongoing Support
SPT recognises that incidents of bullying and harassment can have a lasting impact. Appropriate support may be offered to:

- Individuals affected by the behaviour.
- Witnesses.
- Individuals who have been subject to allegations.
- Staff supporting the process.

18. Appeals

SPT is committed to ensuring that all complaints are handled fairly, consistently and transparently. Where an individual is dissatisfied with the outcome of a formal investigation, they have the right to appeal the decision.

An appeal must be submitted in writing within 10 working days of the outcome being communicated and should clearly state the grounds for appeal.
Grounds for appeal may include:

- New evidence becoming available that was not reasonably available during the original investigation.
- Concerns that the investigation process was not followed correctly.
- Concerns that the outcome was unreasonable based on the evidence presented.
- Concerns that there was a material procedural error that may have affected the outcome.

Appeals will be reviewed by an appropriate manager, panel or senior representative who has had no prior involvement in the case wherever possible.
The appeal review may include:

- Reviewing the original complaint and investigation records.
- Considering any new evidence submitted.
- Meeting with relevant individuals where necessary.
- Reviewing whether the original decision was reasonable and procedurally fair.

Following the appeal review, the outcome may be:

- The original decision is upheld.
- The original decision is partially amended.
- The original decision is overturned.
- A further investigation is required.

The outcome of the appeal will be communicated in writing as soon as reasonably practicable. The decision of the appeal panel or reviewer will be final.

19. Related Policies and Procedures

- Safeguarding Policy
- Equality, Diversity and Inclusion Policy
- Complaints Procedure
- Learner Behaviour Policy
- Staff Disciplinary Policy
- Online Safety Policy
- Prevent Policy
- Data Protection Policy

Appendix A

Anti-Bullying/Harassment Report Form

Learner name:	
Date, Time and location of allegation:	
Member of staff Receiving report:	
Date:	
Case Reference Number:	

SPT needs as much information as possible to undertake an accurate assessment, please include where possible the following:

- *Names of those alleged to be responsible.*
- *What happened.*
- *How it made them feel.*
- *Name of any witnesses.*
- *Any action taken e.g. if reported to a member of staff.*

Notes made by member of staff taking allegation:			
Safeguarding Concern Identified		**Yes** ☐	**No** ☐
If yes, referred to DSL on:			
Immediate actions Taken:			
Referral Made to:			
Support Offered:			
Next Steps:			
Reviewed by:			
Date:			

Outcome of Investigation			
Substantiated	Partially Substantiated	Not Substantiated	Unfounded/Malicious
☐	☐	☐	☐

Date Closed:	
Completed by:	
Signature:	
Date:	
Reviewed by:	
Signature:	
Date:	