

Bullying and Harassment Policy

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Version Control

Version	Date	Author	Changes
1.0	01/09/2025	Patsy Crocker	Initial policy creation
2.0	Jan 2026	Sophie Gilmore	Major revision: enhanced legal framework, detailed definitions and examples, structured reporting procedure, support mechanisms, learner-specific provisions

1. Purpose

Hybrid Training Centre (HTC) is committed to providing a safe, supportive, and respectful environment for all learners, apprentices, and staff. This policy sets out our position on bullying and harassment, the procedures for reporting and addressing concerns, and the support available to those affected.

HTC recognises that bullying and harassment can cause significant harm to individuals, undermining their wellbeing, confidence, and ability to learn or work effectively. Such behaviour is incompatible with our values and will not be tolerated under any circumstances.

2. Scope

This policy applies to:

- All HTC employees, including permanent, temporary, and casual staff
- Agency workers and contractors working at or for HTC
- All learners and apprentices enrolled on HTC programmes
- Visitors to HTC premises
- Employer representatives and workplace supervisors involved in apprenticeship delivery

The policy covers behaviour:

- On HTC premises (training centres, offices)
- At employer workplaces during apprenticeship or work placement
- During any HTC-related activities, events, or trips

- Online, including through social media, email, messaging apps, and virtual learning environments
- Outside the workplace or learning environment where the behaviour impacts on working or learning relationships

3. Legal Framework

This policy operates within the following legal framework:

3.1 Equality Act 2010

Harassment related to a protected characteristic (age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity) is unlawful. Employers can be held vicariously liable for harassment by their employees unless they can demonstrate they took all reasonable steps to prevent it.

3.2 Protection from Harassment Act 1997

This Act makes harassment a criminal offence and provides civil remedies. A course of conduct (on at least two occasions) that causes alarm or distress may constitute harassment.

3.3 Health and Safety at Work etc Act 1974

Employers have a duty to ensure, so far as reasonably practicable, the health, safety, and welfare of employees. This includes protection from bullying and harassment that could affect mental health.

3.4 Other Relevant Legislation

- Employment Rights Act 1996 (constructive dismissal)
- Human Rights Act 1998 (right to respect for private life)
- Criminal Justice and Public Order Act 1994 (intentional harassment)
- Malicious Communications Act 1988 and Communications Act 2003 (online harassment)

4. Definitions

4.1 Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour involving the misuse of power through means intended to undermine, humiliate, denigrate, or injure the recipient. Bullying may be:

- A pattern of behaviour over time, or a single serious incident
- Direct (face-to-face) or indirect (through others or online)
- Committed by individuals or groups
- Intentional or unintentional (impact matters more than intent)

4.2 Harassment

Harassment is unwanted conduct that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Harassment related to a protected characteristic is unlawful under the Equality Act 2010.

4.3 Cyberbullying

Cyberbullying is bullying that takes place through digital devices and platforms, including social media, messaging apps, email, and online forums. It can occur at any time and can reach into spaces previously considered private.

5. Examples of Bullying and Harassment

The following are examples of behaviour that may constitute bullying or harassment. This list is not exhaustive:

5.1 Verbal and Written

- Name-calling, insults, offensive jokes or remarks
- Spreading rumours or malicious gossip
- Ridicule, teasing, or humiliation in front of others
- Threats or intimidating language
- Persistent, unwarranted criticism

5.2 Physical

- Pushing, hitting, or physical intimidation
- Invasion of personal space
- Damage to or interference with personal belongings
- Unwanted physical contact

5.3 Social and Psychological

- Exclusion, isolation, or ignoring someone
- Withholding information needed to perform work or learning
- Setting unrealistic targets or constantly changing expectations
- Undermining someone's work or contribution
- Taking credit for others' work

5.4 Online/Cyber

- Abusive or threatening messages via email, text, or social media
- Sharing embarrassing images or information online
- Exclusion from online groups
- Creating fake profiles or impersonating someone online
- Trolling or posting offensive content

5.5 Discriminatory

- Behaviour targeting someone because of their race, religion, disability, age, sex, sexual orientation, or other protected characteristic
- Use of discriminatory language or slurs
- Displaying offensive materials

6. Policy Statement

HTC is committed to:

- Creating and maintaining an environment where everyone is treated with dignity and respect

- Promoting a culture where bullying and harassment are neither condoned nor tolerated
- Providing clear channels for reporting concerns without fear of victimisation
- Treating all complaints seriously and investigating them promptly, fairly, and confidentially
- Taking appropriate action against those found to have engaged in bullying or harassment
- Supporting all parties involved in complaints
- Taking proactive steps to prevent bullying and harassment through awareness-raising and training

7. Responsibilities

7.1 Senior Leadership Team

- Setting the tone and culture of respect across the organisation
- Ensuring adequate resources for prevention and response
- Monitoring policy effectiveness and compliance

7.2 Chief Operating Officer (Policy Owner)

- Operational responsibility for this policy and its implementation
- Overseeing investigations into complaints
- Ensuring staff receive appropriate training
- Reporting to the Senior Leadership Team on incidents and trends

7.3 Designated Safeguarding Lead

- Maintaining the safeguarding database including bullying/harassment incidents involving learners
- Providing advice and support on safeguarding aspects of complaints
- Liaising with external agencies where appropriate

7.4 Line Managers

- Modelling respectful behaviour and creating a positive team culture
- Being alert to signs of bullying or harassment in their teams
- Taking early informal action to address concerns
- Supporting staff involved in complaints
- Ensuring fair treatment regardless of personal relationships

7.5 Assessors and Trainers

- Creating a safe and respectful learning environment
- Being alert to signs of bullying among learners
- Reporting concerns about learner wellbeing to the Designated Safeguarding Lead
- Supporting learners who disclose bullying or harassment

7.6 All Staff and Learners

- Treating others with dignity and respect
- Taking responsibility for their own behaviour
- Challenging inappropriate behaviour when safe to do so
- Reporting incidents they witness or become aware of
- Supporting colleagues or fellow learners who are being bullied or harassed
- Cooperating with investigations

8. Reporting Procedure

8.1 Informal Resolution

Where appropriate and where the individual feels able to do so, they may try to resolve the matter informally by:

- Speaking directly to the person whose behaviour is causing concern, explaining the impact and asking them to stop
- Seeking support from their line manager, assessor, or the Designated Safeguarding Lead to facilitate a conversation

Informal resolution may be appropriate for less serious matters or where the person may not realise their behaviour is unwelcome. However, no one is obliged to attempt informal resolution, and individuals may proceed directly to the formal procedure.

8.2 Formal Complaint

Where informal resolution is unsuccessful or inappropriate, a formal written complaint should be submitted to the COO (for staff) or the Designated Safeguarding Lead (for learners). The complaint should include:

- Name of the alleged perpetrator(s)
- Description of the behaviour
- Dates, times, and locations of incidents
- Names of any witnesses
- Any evidence (messages, emails, etc.)
- Any previous attempts to resolve the matter

8.3 Investigation

All formal complaints are investigated promptly and thoroughly:

- The COO or appointed Investigation Officer will conduct the investigation
- The investigation will normally be completed within 10 working days
- All parties will be interviewed and given the opportunity to present their case
- Detailed written statements will be taken
- Witnesses may be interviewed
- All parties have the right to be accompanied to meetings
- For learners under 18 or vulnerable adults, parents/guardians will be involved

8.4 Interim Measures

Depending on the severity of the allegations, interim measures may be implemented pending the outcome of the investigation:

- Separation of the parties (different work areas, class groups)
- Suspension of the alleged perpetrator (without prejudice)
- Temporary changes to reporting lines or assessment arrangements

8.5 Outcomes

Following investigation, outcomes may include:

- No case to answer – complaint not upheld
- Informal resolution (apology, mediation, training)
- Formal warning
- Disciplinary action (up to and including dismissal for staff, or removal from programme for learners)
- Referral to police (where criminal conduct is suspected)

Both the complainant and the alleged perpetrator will be informed of the outcome in writing.

9. Protection from Victimisation

HTC will not tolerate victimisation of anyone who:

- Makes a complaint in good faith under this policy
- Supports someone making a complaint
- Gives evidence in an investigation
- Raises concerns about bullying or harassment

Victimisation is a serious disciplinary matter and will be dealt with under the relevant disciplinary procedure.

10. Malicious Complaints

If an investigation concludes that a complaint was both untrue and made with malicious intent, the complainant may be subject to disciplinary action. However, HTC recognises that complaints made in good faith that cannot be substantiated are not malicious, and individuals should not be deterred from raising genuine concerns.

11. Support

HTC provides support to all parties involved in bullying and harassment complaints:

11.1 For Complainants

- Access to the Designated Safeguarding Lead for advice and support
- Signposting to counselling services and external support organisations
- Regular updates on the progress of investigations
- Ongoing monitoring following resolution

11.2 For Those Accused

- Clear information about the allegations and process
- Right to be accompanied at meetings
- Access to support services
- Fair and impartial investigation

11.3 Counselling and Training

Where appropriate, HTC may offer counselling, mentoring, or training to help individuals modify their behaviour or recover from experiences of bullying or harassment.

12. Record Keeping

The COO maintains confidential records of all formal complaints, including:

- Details of the complaint and parties involved
- Investigation records and evidence
- Outcome and any actions taken
- Monitoring and follow-up

Records involving learners are also logged on the safeguarding database by the Designated Safeguarding Lead. Records are retained in accordance with the Data Retention Policy and are stored securely with restricted access.

13. Training

HTC provides:

- Awareness training on bullying and harassment as part of staff induction
- Information for learners during programme induction
- Refresher training for all staff at least annually
- Specialist training for managers and investigators
- Targeted training where concerns have been identified

14. Related Documents

- Disciplinary Policy (Staff)
- Disciplinary Policy (Learners)
- Grievance Policy
- Whistleblowing Policy
- Safeguarding Policy
- Equality and Diversity Policy
- Social Media Policy
- Data Protection Policy

15. Monitoring and Review

This policy is monitored through:

- Analysis of complaints data (numbers, types, outcomes)
- Feedback from staff and learners
- Exit interview data
- Staff and learner surveys

The policy is reviewed annually by the COO or sooner if required by changes to legislation or best practice guidance.

Policy Approval

Signature:

Date:

Sophie Gilmore

Group Chief Executive Officer