



SIR ROBERT PATTINSON ACADEMY

ANTI-HARASSMENT & BULLYING POLICY

Reviewed in Academy: November 2025

Approved by Trustees: 3 November 2025

Review Date: November 2026

POLICY OVERVIEW

1. Policy Overview

- 1.1 In compliance with the Worker Protection (Amendment Equality Act 2010) Act 2023, all of our staff [and volunteers] have the right to work in an environment that is free from any form of harassment and bullying. This is something that the Academy takes very seriously. Our policy is one of zero-tolerance: we believe that harassment, bullying and victimisation have no place in our Academy.
- 1.2 This policy should be read in conjunction with other relevant policies including our policies on Allegations of abuse against staff, Code of Conduct, Whistleblowing and our Disciplinary Policy and Procedure.
- 1.4 At the end of this policy, you will be asked to sign an online declaration to confirm that not only have you read the policy, but you agree to abide by our rules and the particular requirements to avoid, call out, discourage and stand up against harassment and bullying. It is a condition of working for us that you sign this declaration.

2. Policy Application

- 2.1 This policy applies to all employees, workers, volunteers, officers, contractors working on site and agents. In other words, it applies to anyone who works with us or for us (we use the phrase “**Stakeholders**” to encompass all of these possibilities).
- 2.2 This policy applies to behaviour irrespective of where it takes place and when it takes place. This means that, as a Stakeholder, your behaviour under this policy is relevant even if it takes place off our premises and outside of your working hours. So conduct at a work-related social event, or on a business/education trip is regulated by this policy.

3. Personal relationships in the workplace

It is recognised that staff working together may form personal relationships during their employment or may be related to one another and it is not for the Academy to interfere with any such relationship. It is, however, necessary to ensure that all staff behave appropriately and professionally at work. Further guidance can be found in the Academy’s Code of Conduct Policy for Staff.

What is harassment?

- 3.1 There are primarily two components to harassment:
 - (a) Firstly, that it is conduct which is **unwanted**; and
 - (b) Secondly, that it is conduct related to a **protected characteristic**¹
- 3.2 Harassment can have a very damaging effect on an individual. Under the law as it currently stands, harassment under the Equality Act 2010 is unwanted conduct relating to a protected characteristic which either violates a person’s dignity, or creates a hostile, humiliating, degrading or similarly offensive environment.

¹ A protected characteristic is one that attracts special protection in law under the Equality Act 2010, and includes age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

3.3 Harassment can take on a number of different forms. It can be physical, verbal or non-verbal. Particular examples include:

Spoken words • Banter • Written words • Posts or contact on social media • Imagery • Graffiti • Physical gestures • Facial expressions • Mimicry • Jokes or pranks • Acts affecting a person's surroundings • Aggression • Physical behaviour towards a person or their property • ostracising and excluding • Belittling someone • Disrespecting another's person's views.

3.4 Potentially, a single comment or act can amount to harassment.

3.5 Importantly, an individual does not have to make it clear that conduct is unwanted for conduct to amount to harassment. It is not unusual for victims of harassment to develop a coping strategy of seemingly "going along with" or participating in or even encouraging conduct. All staff, particularly managers, must be particularly attuned to this.

3.6 Unwanted conduct does not have to be "aimed" at someone to amount to harassment. For example, an individual who overhears an offensive joke may be the victim of harassment. This means that things said online, particularly through social media, may amount to harassment.

3.7 The impact on a victim is very important. People's behaviour can amount to bullying or harassment even if they had no idea, it would be perceived that way.

4. What is Bullying?

5.1 There is no legal definition of bullying². In our workplace, we define bullying as:

- (a) Unwanted conduct.
- (b) Which has the purpose or effect of making a Stakeholder feel threatened, intimidated, humiliated, vulnerable, unwelcome or upset.
- (c) Is unjustified.

5.2 What amounts to unwanted conduct is the same as for harassment, and includes more subtle actions such as deliberate exclusion, e.g. 'sending someone to Coventry'. There is no need, however, for bullying to relate to a protected characteristic to be unacceptable in our Academy.

5.3 What separates bullying from harassment is that the conduct must be unjustified. This is because there are certain behaviours which are a necessary part of management that can be unwanted and cause upset, but are justified, such as performance management. Thus, constructive criticism about behaviour or performance from a manager is not bullying. It is part of normal employment and management routine and should not be interpreted as anything different.

6. Particular rules of behaviour

6.1 It is impossible to set out an exhaustive list of possible instances of harassment or bullying, and we do not intend to do so here. In general, we want to foster a positive working environment for all our Stakeholders, and as such we draw your attention to the following particulars rules:

- (a) **Respecting pronouns** – this means if a person has asked you to use a specific pronoun to describe them, then you should use this pronoun and not substitute your own.

² You should be aware, however, that it is an offence (both a criminal offence and civil offence) to harass someone under the Protection from Harassment Act 1997. Harassment under this law does not require the conduct to be connected to a protected characteristic. The law defines harassment in this context as a course of conduct (i.e. more than one incident) which has the purpose or effect of causing alarm and distress.

- (b) **Avoid stereotyping** – generally, this means not making assumptions about people based on stereotypes (this includes “positive stereotypes”, which are stereotypes based on a protected characteristics that seem positive, but which are nonetheless presumptions, such as the idea that all Asians are good at maths).
- (c) **Avoiding sexual comments and “banter”** – Sexual comments, jokes, or banter of any kind are strictly prohibited, even if intended as humour. What one person considers harmless banter can be offensive or distressing to another, particularly if it is unwanted or repeated.
- (d) **Avoiding tribalism** - Tribalism, or the division of people into groups that exclude or isolate others, can foster an unhealthy work environment. This includes cliques, favouritism, and any behaviour that divides teams or isolates individuals. All stakeholders are expected to contribute to a cooperative and inclusive atmosphere where everyone feels equally valued.
- (e) **Avoid microaggression** – Microaggressions are subtle, often unintentional actions or comments that demean or marginalize individuals based on a protected characteristic. This includes statements like “You’re so articulate for someone from [background]” or “You don’t look disabled.”
- (f) **Be aware of mental health and wellbeing** – All stakeholders must recognise the importance of mental health in the workplace. Comments or actions that trivialize mental health challenges (e.g., “Everyone gets anxious, just push through it”) or make light of someone taking time off for mental health reasons are unacceptable.
- (g) **We celebrate diversity of thought and perspective** – Stakeholders should be encouraged to respect diversity of opinion and perspective. Dismissing or belittling someone’s viewpoint based on their background, position, or experiences is not conducive to a respectful environment. This is particularly important in fostering innovation and creativity, where diverse thinking can be a competitive advantage.

6.2 Just as important, we do not want to foster a working environment where people are afraid to interact because they are worried about how someone might react. We encourage Stakeholders to be respectful, but also patient. People will make mistakes and misjudge situations. Minor, one-off, or innocent mistakes will be reviewed individually under this policy. Stakeholders are encouraged to talk through problems and disagreements, and not weaponize political correctness. Thus, Stakeholders must not openly or in front of others accuse someone of harassment or bullying – instead, they should report their concern using the appropriate Staff Concern Reporting Procedure (Appendix 2).

7. Speaking Up

- 7.1 All Stakeholders are encouraged to think about their behaviours and the effect they have on others. The starting point is healthy and constructive dialogue. We understand, for instance, that people can misjudge situations. In a case where someone says something which you perceive to be offensive, we encourage you to say so politely.
- 7.2 If, whether you have line management responsibility or not, you witness behaviour towards a Stakeholder that you think is, or may be, a breach of this Policy, then the first thing to do is discuss it with the affected Stakeholder and encourage them to raise it with their line manager. In certain situations, it may be appropriate to report potential harassment or bullying (using the Staff Concern Reporting procedure below) where you witness

harassment or bullying without the affected Stakeholder's consent. This is a judgment call. It will depend on things like the seriousness of the behaviour and the reason why the affected Stakeholder is reluctant to come forward.

8. Our legal duty to prevent Sexual Harassment

- 8.1 As of the 2024 amendment to the Equality Act 2010, we recognise that employers are legally required to take proactive steps to prevent sexual harassment in the workplace.
- 8.2 Under this duty, the Academy is committed to:
- Implementing effective measures to prevent harassment, including by third parties, in all work-related contexts.
 - Taking reasonable steps to ensure that any instances of harassment are swiftly identified, investigated, and addressed.
 - Providing training and clear guidelines to staff and management on how to recognise, prevent, and respond to harassment.
 - Creating a safe reporting environment for all employees to raise concerns about inappropriate behaviour, whether it involves internal staff or third parties.
- 8.3 Failure to meet this legal duty could expose the Academy to legal liability. Therefore, the Academy prioritises a proactive and robust approach to preventing harassment in the workplace, ensuring that the wellbeing of all employees is protected.

9. Confidentiality

- 9.1 Any discussions that a Stakeholder has about an incident or incidents under this policy, are confidential and must not be disclosed to any other Stakeholder or third party.
- 9.2 A Stakeholder may Report a Concern under this policy anonymously, but the Stakeholder is reminded that remaining anonymous may hinder the Academy's ability to investigate or resolve the issue.
- 9.3 If the Academy reasonably considers that it is necessary to convey information to a Stakeholder as part of taking any action under this Policy, or a policy connected to this Policy, such as the Disciplinary Procedure, then it will do so. In this sense, confidentiality cannot be completely guaranteed.

10. "Third Party" Harassment

- 10.1 Just as the Academy won't tolerate harassment in the workplace, we also consider harassment of our Stakeholders from Third Parties to be unacceptable. In this context, Third Parties are people who interact with our Stakeholders in a business context, such as parents/carers, students, suppliers, agents, and contractors.
- 10.2 Anybody affected by, or witnessing, unwanted conduct from a Third Party should raise this first with their line manager and if appropriate follow the Staff Concern Reporting Procedures.
- 10.3 Dealing with harassment from a Third Party is sometimes more difficult for the Academy because we do not always have direct control over the actions of a Third Party, but action that the Academy will consider taking includes:

- Raising the issue directly with the Third Party
- Raising the issue in confidence with someone in authority at the Third Party
- Restricting or ceasing contact between the person affected by the behaviour and the Third Party, either permanently or temporarily
- Enforcing any contractual rights, we might have against the Third Party
- Terminating our relationship with the Third Party
- Engaging a Third Party's complaints procedure
- In very serious cases, supporting our Stakeholders referring the matter to an external authority, such as the Police.

11. Support for Affected Stakeholders

- 11.1 For the purposes of this section, an affected Stakeholder is any Stakeholder affected by harassment or bullying in the workplace, including someone who raises a Report a Staff Concern and a person who is the subject of a Report.
- 11.2 All affected Stakeholders are entitled to support under this Policy.
- 11.3 What amounts to support will be determined by the Academy depending on the nature of the circumstances, but support could include:
- Referral to counselling services (Education Mutual)
 - Allocating the Stakeholder a single point of contact for anything relating to his policy
 - Adjustments to work duties and environment, including temporary relocation.
 - Changing temporary line management structures
 - Increased managerial support.
 - Allocating the Stakeholder an appropriate person to provide support who is has had no previous involvement with the situation.
 - Signposting to appropriate wellbeing programs, such as mindfulness sessions, stress management workshops, or resilience-building courses (Education Mutual)

12. Training

- 12.1 We are committed to ensuring that all employees understand their rights and responsibilities concerning harassment and bullying. To support this, we provide comprehensive and regular training to all staff members, including managers and supervisors, with the goal of fostering a safe, respectful, and inclusive workplace.
- 12.2 This includes committing to making sure that:
- All new recruits receive training on induction.
 - Managers receive appropriate training on dealing with instances of harassment and bullying.
 - All staff receive regular "refresher" training.

- 12.3 The effectiveness of training will be evaluated through employee feedback. Results will help identify areas for improvement and guide future training initiatives.
- 12.4 All training will be documented.

13. Abusing this Policy

- 13.1 All Staff Concern Reports will be taken seriously and dealt with fairly and reasonably under this Policy. However, a person reporting a concern must be mindful that a “complaint” of harassment or bullying can be very serious and have serious consequences for the person who is the subject of the complaint.
- 13.2 Accordingly, there are certain rules about raising concerns under this Policy. This includes when reporting and giving information, either as a witness or otherwise. These rules are:
- (a) Complaints must be made in good faith;
 - (b) Information provided must be truthful and honest;
 - (c) Stakeholders must not abuse this process by making vexatious complaints or complains are retaliatory in nature.

14. Breaches of this Policy

- 14.1 This Policy is important, and all Stakeholders should read it carefully. A breach of this Policy is very likely to be a disciplinary offence and will be dealt with through the Academy’s Disciplinary Procedure. A serious or persistent breach of this Policy may result in instant dismissal. Very serious examples of harassment or bullying could lead to civil or criminal proceedings.

15. Monitoring and Review

- 15.1 The effectiveness of this Policy will be ensured through regular monitoring and review. All incidents will be tracked and analysed to identify patterns and improve preventative measures. Employee feedback gathered will inform adjustments to the policy and training programs. The policy will undergo an annual review to remain compliant with legal obligations, including the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023, and will be updated promptly in response to significant incidents or changes in law. Senior leadership will oversee the policy's implementation, ensuring managers and HR respond effectively to complaints and support affected employees. This continuous evaluation helps foster a safe, respectful, and inclusive workplace for all staff members.
- 15.2 If you want to give feedback on this policy, you are welcome to contact Donna Garrett, HR Manager.

Declaration (exemplified below and completed online)

By signing this declaration, I declare that I have read and understood this policy and agree to abide by its terms, and I will:

- **Respect** all individuals at my workplace
- Not engage in any behaviour which could reasonably be regarded as **bullying, harassment, discrimination, victimisation or retaliation**
- Deal with people with appropriate **respect, courtesy, professionalism and etiquette**
- Not **ostracise, ignore, mock or shun** any of my work colleagues or otherwise do or fail to do something which reasonably makes them feel uncomfortable, offended, degraded or humiliated
- **Actively listen** to people
- Raise concerns in **good faith** which are genuine
- Treat those that have raised concerns to me with confidence and in a **fair manner**
- **Speak up** and act when I see people acting inappropriately
- **Help and support** my colleagues, especially those that are more junior to me
- Consider the impact and perception of my actions, especially when voicing a difference of opinions – **I will always respect the legitimate views of others**, even if I do not agree with them
- Support, uphold and promote the Academy's **core values** of honesty, integrity, trustworthiness, accountability, teamwork and professionalism
- Help promote a **positive working environment and culture**

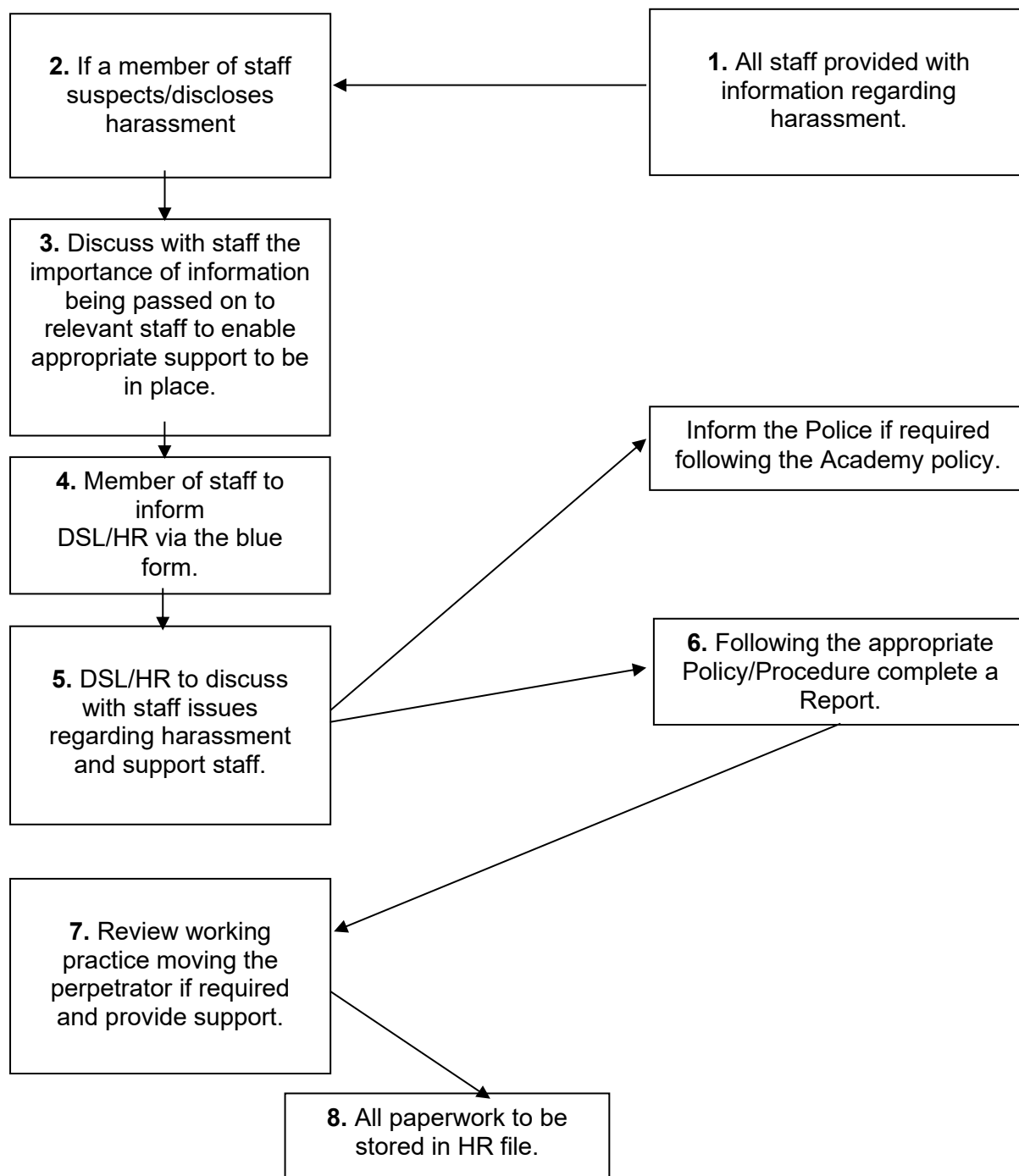
SIGNED: _____

PRINT NAME: _____

DATED: _____



Appendix 1 - Harassment Referral Pathway



Staff Concern Reporting Procedures

