Sutton & District Training Limited

PREVENTION OF HARASSMENT & BULLYING POLICY

Date effective from:	01/08/2026
The Policy will next be reviewed:	01/08/2027
Policy approved by:	Julie Ingleton
Signed:	
Date:	27/10/2026

SUTTON & DISTRICT TRAINING LIMITED

Prevention of Harassment & Bullying Policy

SDT is committed to providing a safe, friendly and secure environment where students can learn in a caring environment. Staff will ensure that all students understand this policy by explaining it to each individual student in a way that is person-centred and appropriate to any needs they may have.

Staff are expected to ensure that the personal dignity of all the staff, students, apprentices, visitors and contractors is upheld by the prevention of any incidents of harassment, bullying or inappropriate behaviour.

What is harassment?

1. Harassment is defined as unwanted conduct which is offensive to the recipient. It includes behaviour which is unsolicited, personally offensive, and fails to respect the dignity and rights of others. In many cases, the person carrying out the harassment fails to recognise the impact that such behaviour may have.

2. It is the deed itself and its impact on the recipient – not the intention of the perpetrator – which constitutes harassment or unwanted conduct which is offensive to the recipient. Harassment may take many forms and occurs in a variety of ways; it can be directed at an individual or a group, and it often involves discrimination.

3. Harassment may be:

    - Physical: involving direct contact, assault or gestures; intimidation; or aggressive behaviour
    - Verbal: including unwelcome and thoughtless remarks, suggestions and propositions; malicious gossip; or jokes and banter involving age, gender reassignment, racial, sexual, disability, religious or belief, sexual orientation and other discriminatory forms of innuendo
    - Non-verbal: including offensive writing, literature or pictures, graffiti and computer imagery; or deliberate exclusion from social activities.

Sexual harassment is now specially defined in law. It is:

- Comments about the way you look which you find demeaning
- Indecent remarks
- Questions about your sex life
- Sexual demands by a member of your own or the opposite sex
- Any conduct of a sexual nature which creates an intimidating, hostile or humiliating working environment for you; this includes viewing, displaying and downloading of offensive material (including, but not limited to, pornography) at work or vocational training.

We have a separate confidential procedure for complaints about sexual harassment.

4. Social and cultural differences in behaviour have to be taken into account and these are to be respected. We expect staff and students to conduct themselves at all times in ways which are acceptable to others. They should proactively think about ways to resolve potential conflicts.

5. The dignity of an individual is especially important. An insult to dignity at work or in vocational learning could constitute a legal offence of harassment amounting to discrimination if it involved an insult to a person's religion or beliefs, including philosophical beliefs, race or ethnic or national origin, sexual orientation, disability or learning difficulty because it involved:

    - Any unwanted conduct
    - Making an intimidating or hostile atmosphere
    - Actions which degrade or humiliate
    - Causing an offensive environment.

Our Commitment

1. We are committed to maintaining a working and learning environment free from harassment, bullying, intimidation and offensive behaviour in any form, verbal or non-verbal. All staff are expected to carry out their duties effectively, confidently and competently; they and their students have the right to work and learn without fear of harassment or bullying and without loss of dignity.

2. If a complaint is made to management about harassment or bullying, it will be investigated promptly and appropriate action taken. Our disciplinary procedure will be used, where necessary, if the complaint is upheld.

3. A written record of the complaint must be made in the complaints book and this document should be protected under our confidentiality procedures.

4. We will not require anyone who is complaining about sexual harassment to use the standard grievance procedure. A separate and confidential procedure exists to take privacy into account in such cases.

5. Some types of harassment are unlawful cases of discrimination. Harassment, including bullying, is unacceptable to us whether or not it is categorised as unlawful.

What is bullying?

1. Bullying is defined as a behaviour that uses power or influence in order to hurt others. Bullying can take the form of persistent, intentional undermining of an individual or it can be a single incident. Bullying can be carried out by an individual or group. Bullying usually fall into four main groups:

    - Physical bullying
    - Verbal/written bullying
    - Cyber bulling
    - Emotional bullying

2. Like harassment, it is the impact of the behaviour on the recipient which constitutes bullying – not its intention.

Management responsibility

1. Management will seek to eliminate harassment and bullying in the workplace. Managers will be alert to all forms of harassment and bullying in their areas of responsibility and, after careful consideration, take action immediately – whether or not the matter has been brought formally to their attention.

2. If a complaint about harassment or bullying is brought to the attention of a manager, he or she will:

   - Ensure that appropriate procedures are followed, including informing the DSL
   - Secure support for individuals who complain about harassment or bullying before, while and after the complaint is investigated
   - Treat the matter in a sensitive and confidential manner; and
   - Keep full notes of incidents, information received and action taken.

3. Staff who fail to carry out their responsibilities under this policy may be regarded as colluding with the person accused by the complainant, and appropriate action will be taken.

Our procedures

1. These procedures for dealing with complaints about harassment and bullying seek to ensure minimal stress for the complainant, the timely resolution of complaints and a degree of flexibility appropriate to individual circumstances.
2. When a complaint about harassment or bullying is made, the complainant may follow an informal or formal route. The option of using either route remains open at any stage of the procedure.
3. Since perceptions about harassment and bullying may vary between individuals, it should in the first instance be made clear to the alleged perpetrator that the behaviour is unwelcome and should stop. If this is difficult or embarrassing for the complainant, the initial approach could (with the consent of the complainant) be made by another member of staff or a trade union representative.

The informal route

1. The purpose of the informal route for considering allegations of harassment or bullying is to:

   - Enable the complainant to raise the matter so that it will receive attention in an understanding manner; and
   - Decide, in consultation with the complainant, on a course of action which will resolve the problem at its source.

2. It is important that problems about harassment or bullying are raised and not allowed to continue unchallenged. Members of staff or learners who suffer these problems are advised to:

   a. Tell the harasser or bully, either orally or in writing, that the unwanted behaviour must stop b. Confide in a friend, if it would help

   c. If it is difficult to confront the harasser or bully, contact another member of staff who could help. Concerns may be raised informally and in confidence with a counsellor, a trade union representative or George Panteli

   d. Talk to their line manager or another member of management or assessor for learners, about any informal or formal action which could be taken

   e. Whatever the circumstances, keep a detailed record of any incidents immediately after the event, including:

      - The date, time and place
      - The name of the person responsible for the harassment or bullying
      - What actually happened
      - The name(s) of any witnesses
      - The action taken by the person harassed or bullied
      - Whether or when reported to management and to whom.

The formal route

1. The purpose of the formal route for considering complaints and allegations of harassment or bullying is to:

    - Secure an investigation by management into the complaint or allegation
    - Ensure that appropriate action is taken both to stop the unwanted behaviour and against the offender if the complaint is upheld

2. Whatever the circumstances, the complainant should keep a detailed record of any incidents as outlined in paragraph 2(e) above

3. A member of staff or student who suffers harassment or bullying should raise the matter formally with an appropriate manager if he or she chooses to take the formal route or if the informal route has been followed and found to be ineffective.

4. The matter should be raised in writing specifying whether it is a complaint or a formal grievance. If it is the latter, the grievance procedure will be followed.

5. Complaints and grievances will be investigated promptly and discreetly. Both parties have the right to be accompanied by a colleague or a trade union representative during the investigation and at any hearing. If the complaint is upheld, it will be made clear to the offender that the behaviour which gave rise to the complaint is unacceptable and must cease forthwith.

6. If the matter is not resolved through the consideration of the complaint or the grievance procedure, it will be referred to a Director who will decide whether the disciplinary procedure should be used.

7. Whatever the outcome of the matter, the appropriate managers will seek to ensure that the complainant is not subject to any detrimental treatment as a consequence of making the complaint. If the complaint is not upheld, the appropriate managers will seek to ensure that the defendant is not subject to any detrimental treatment as a consequence of the complaint.

8. If the complaint is found to be malicious, a Director will decide whether the complainant should be the subject of a disciplinary investigation.

Appeals

If either party can show that the matter has not been considered in accordance with the procedure in this policy, an appeal may be made under the grievance procedure.

Review

The effectiveness of this policy will be reviewed annually.

Policy Improvement

Members of staff and learners are encouraged to put forward suggestions for improvement to this policy. The policy sponsor is Julie Ingleton (Director)

Signature:  **Date:** *27/10/2026*