



Vanguard Learning Trust

As a group of local primary and secondary schools, Vanguard Learning Trust's mission is to serve its local community by providing outstanding, inclusive education. We have a collective purpose and responsibility to provide effective teaching, through a curriculum based on equality of opportunity and entitlement that allows our young people to shine both in and out of the classroom. Each school in the Trust has its own ethos, which also complements the Trust's vision and values, and the common aspiration that all young people can achieve their potential.

Staff anti-harassment and anti-bullying policy

Summer 2025

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Section 1: Introduction

1.1 Work environment

Vanguard Learning Trust (VLT) is committed to a work environment free of harassment and bullying, where everyone is treated with dignity and respect. VLT takes a firm stance against bullying between students, and it is important that all employees lead by example with their own behaviour.

1.2 Consequences of harassment and bullying

Harassment and bullying can have very serious consequences for individuals and the Trust including loss of morale, poor work performance, increased turnover of staff, legal claims and damage to the Trust/school's reputation. The impact of harassment and bullying in the workplace can also impact an individual's health and their family and social relationships.

1.3 Prevention of harassment and bullying

Allegations of harassment or bullying are taken seriously and active steps will be taken to prevent and address them promptly and confidentially. Harassment, or the bullying of any member of employees, or anyone they come into contact with during the course of their work, can be unlawful and will not be tolerated. Harassment or bullying by an employee will be treated as misconduct under the VLT disciplinary procedure. In some cases, it may amount to gross misconduct leading to summary dismissal.

1.4 Reporting and action

Anyone who is a victim of, or witness to, harassment or bullying is encouraged to report it in accordance with this policy. This will enable leaders to take appropriate action and provide support. Harassment and bullying can result in legal liability for both the organisation and the perpetrator, whether they work for VLT, or are a third-party outside of the Trust's control. Should an employee wish to disclose or report incidences of sexual harassment, there is a separate VLT preventing sexual harassment at work policy.

1.5 Contract of employment

This policy does not form part of any employee's contract of employment and may be amended at any time.

Section 2: Scope and purpose of this policy

2.1 Purpose of the policy

The purpose of this policy is to set out a framework for VLT to deal with any harassment, bullying or victimisation that occurs.

2.2 Unacceptable behaviour

The policy sets out the types of behaviour that are unacceptable and covers bullying and harassment both in and out of the workplace such as on school trips, at school events or work-related social functions. This policy covers bullying and harassment by employees and also by third parties such as (but not limited to) suppliers, parents or visitors to the school premises.

2.3 Application of the policy for employees

This policy applies to all employees of the Trust, governors, trustees, contractors, casual and agency staff and volunteers (collectively referred to as employees in this policy). The policy does not apply to students or parents who consider they have been the subject of bullying or harassment by VLT employees, where separate complaints procedures apply.

2.4 Employee concerns

Employees may raise a concern under this policy, the VLT preventing sexual harassment at work policy or the VLT grievance procedures, but not more than one of these policies/procedures. Employees who are not satisfied with the outcome of the process may raise a grievance through the Trust's grievance procedure.

Section 3: The legal framework

3.1 Acts of law

The Equality Act 2010 prohibits harassment related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics). The Protection from Harassment Act 1997 also makes it unlawful to pursue a course of conduct which is known or ought to be known as harassment, which includes causing someone alarm or distress. Further, the Worker Protection (Amendment of Equality Act 2010) Act 2023 places a responsibility on organisations to take reasonable steps to prevent sexual harassment in the workplace (refer to separate VLT preventing sexual harassment at work policy). Under the Health and Safety at Work Act 1974, employees are entitled to a safe place and system of work.

3.2 Personal liability

Individual members of staff may in some cases be personally legally liable for harassment of colleagues or third parties (including students) and may be ordered to pay compensation by a court or employment tribunal.

Section 4: What is harassment?

4.1 Definition of harassment

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of:

- violating a person's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past. *Staff may experience bullying and harassment from:*

- *Other staff*
- *Parents/carers*
- *Governors and trustees*
- *Students*

4.2 Unlawful harassment

Unlawful harassment may involve conduct related to a protected characteristic (see Section 3.1) or of a sexual nature (refer to separate VLT preventing sexual harassment at work policy). Harassment is unacceptable even if it does not fall within any of these categories.

4.3 Unintended harassment

A person may be harassed even if they were not the intended 'target'. For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for them. Harassment may also occur even if an individual does not have a protected characteristic, but another individual engages in unwanted conduct towards them because they:

- perceive the recipient to have a protected characteristic; or
- are associated with a person who does have a protected characteristic.

A single incident can amount to harassment. The fact that the perpetrator did not intend to harass the victim is not relevant to determining whether harassment took place.

4.4 Victimisation

Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

- bringing proceedings under the Equality Act 2010;
- giving evidence or information in connection with proceedings under the Equality Act 2010;
- doing any other thing for the purposes of or in connection with the Equality Act 2010; and
- alleging that a person has contravened the Equality Act 2010.

4.5 Actions that may constitute victimisation

Victimising a person may include, but is not limited to:

- unreasonably denying their requests at work, for example annual leave requests;
- unreasonably denying them opportunities at work, for example promotions;
- bullying behaviour such as intimidation, mockery, being rude and/or dismissive;
- socially isolating them so they do not have the confidence to raise a grievance; or
- unfairly dismissing them.

4.6 Reporting retaliation or victimisation

If an employee believes they have suffered any such treatment they should inform the headteacher/CEO. If the matter is not remedied to their satisfaction, they can raise it formally using the channel outlined within Section 8 of this policy or via the VLT grievance procedure. If the matter relates to sexual harassment, it should be raised formally using the VLT preventing sexual harassment at work policy.

4.7 Disciplinary action

Harassment and victimisation are unlawful and will not be tolerated. Such actions may lead to disciplinary action up to and including dismissal for gross misconduct if they are committed:

- in a work situation;
- during any situation related to work, such as at a social event with colleagues;
- against a colleague or other person connected to us outside of a work situation, including on social media;
- against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.

VLT will consider any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

4.8 VLT action against harassment

If any harassment or victimisation of employees occurs, VLT will take steps to remedy any complaints and to prevent it happening again. Action may include updating relevant policies, providing further staff training and taking disciplinary action against the perpetrator.

4.9 Third party harassment

Third-party harassment occurs where a person is harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, derogatory comments about a person's age, disability, pregnancy, colour, religion or belief, sex or sexual orientation from any third party, including but not limited to parents, contractors and suppliers visiting the employer's premises, or where a person is visiting any third party premises or other location in the course of their employment.

4.10 Third-party harassment

Third-party harassment can result in legal liability and will not be tolerated. VLT will take active steps to prevent third-party harassment of employees. Action may include warning notices or recorded messages at the beginning of telephone calls. All employees are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy. If any third-party harassment of employees occurs, VLT will take steps to remedy any concerns and to prevent it happening again. Action may include warning the person who is alleged to have harassed about their behaviour, banning them from the Trust premises, reporting any criminal acts to the police, terminating contracts with suppliers and sharing information with other Trust schools. Any harassment by a member of staff against a third-party may lead to disciplinary action up to and including summary dismissal.

Section 5: What is bullying?

5.1 Definition of bullying

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

5.2 Informal resolution

Legitimate, reasonable and constructive criticism of an employee's performance or behaviour or reasonable instructions given to employees in the course of their employment, will not amount to bullying on their own. It is also recognised that differences of opinion and constructive criticism in relation to work and performance may occur from time to time in any normal working environment. VLT would normally expect employees to resolve issues through informal processes rather than through the use of the formal procedure set out below.

5.2.1 Informal procedure

Under the informal stage, employees who feel that they have been subjected to harassment should inform the other person(s) involved, if appropriate and they feel able to do so, that their conduct is regarded as unwelcome, offensive and/or interfering with work. The aim of the informal stage is to allow an opportunity for resolution without recourse to the formal procedure.

Where the complainant feels uncomfortable in approaching the other individual directly, assistance may be sought from a senior leader who will make the initial approach if required. If assistance from a senior leader is sought in making such an approach, this action will not be considered to be a disciplinary sanction.

This preliminary stage does not detract from the sensitivity or the potential seriousness of the

situation. Rather, it allows complainants greater flexibility in choosing the most appropriate option they wish to follow having sought advice.

Section 6: Examples of bullying and harassment

Bullying and harassment can take the form of physical, verbal and non-verbal conduct. Employees should always consider whether their words or conduct could be offensive. Conduct may be harassment or bullying whether or not the person behaving in that way intends to offend. *Examples of unacceptable conduct can be found in Appendix 1.*

Section 7: Reporting

7.1 Advice and support

If an employee is not certain whether an incident or series of incidents amounts to harassment and/or bullying, they should initially contact the school's HR lead or director of people (DoP) for central team staff, informally for advice and support. If the reported concern is about the school's HR lead or the DoP, they should refer it to another senior leader. Informal advice, in line with the procedures of this policy, may be sought from a trade union representative.

7.2 Disclosures

If an employee wishes to disclose harassment and/or bullying they should speak to the school's HR lead, a senior leader, or the headteacher (CEO for central team employees). The person listening to the reporter may ask questions to establish the facts and document the answers. An employee may choose to make a formal disclosure under this policy if:

- The informal stage is unsuccessful in bringing a resolution;
- The employee does not wish to address the matter under the informal procedure (section 5.2);
or
- The serious nature of the disclosure means that an informal procedure is inappropriate.

A senior leader can also initiate the formal procedure should they become aware that harassment and/or bullying has taken place. Senior leaders will not make a personal judgement on the validity of the disclosures and will always ensure that the matters are investigated. Senior leaders will have received training on how to manage and respond to such disclosures. This training will be updated annually.

7.3 Staff who witness harassment and/or bullying

Staff who witness harassment and/or bullying are encouraged to take appropriate steps to address it and will be supported where they do so. Depending on the circumstances, this could include:

- intervening where they feel able to do so;
- supporting the victim to report it or reporting it on their behalf;
- reporting the incident where they feel there may be a continuing risk if it is not reported; and
- co-operating in any investigation into the incident.

7.4 Support for witnesses

All individuals reporting concerns and witnesses will be provided with appropriate support and will be protected from victimisation.

7.5 Steps to address reported concerns of harassment and/or bullying

Staff reporting concerns should be aware that once a formal investigation is commissioned, they will not be informed of the specific findings and/or sanctions if relevant as this is a confidential process. They should, however, be reassured that the Trust is taking prompt action to deal with the matter and will be interviewed as part of the investigation. Should staff be dissatisfied with how the matter is being dealt with, they can raise a grievance in accordance with the Trust's grievance procedures. A copy of the procedures can be located on the Trust's policy drive

Section 8: Formal investigations

8.1 The Trust's disciplinary policy and procedures

An investigation will be carried out in line with the Trust's disciplinary policy and procedures. The commissioning officer will be the headteacher or the CEO for central team employees and an external investigating officer may be commissioned to lead the investigation. Depending on the allegation, an initial fact-finding process may be carried out. All investigations will be carried as promptly as possible. The person who has made a disclosure will be updated by the headteacher every 10 working days on the expected timeline of the process. As stated in section 7.5, staff reporting concerns should be aware that once a formal investigation is commissioned, they will not be informed of the specific findings and/or sanctions if relevant as this is a confidential process. The person who has made a disclosure will be updated by the headteacher every 10 working days on the expected timeline of the process.

8.2 Consideration for action in line with KCSIE

If, following the investigation, it has been concluded that there is a case to answer to, consideration will be given at this point in relation to whether the conduct either amounts to or continues to amount to a reportable safeguarding concern under KCSIE, in addition to any transferable risks that may require consideration under KCSIE. There may be a decision to wait until the disciplinary panel's decision is made following the hearing.

8.3 Resignation during/after the investigation

Where the alleged perpetrator resigns part way through an investigation or following the investigation, the school/Trust will consider whether it is appropriate or not in the circumstances to proceed to a disciplinary hearing in the alleged perpetrator's absence. If the concerns have been assessed as amounting to a reportable safeguarding concern under KCSIE the process will be seen through to completion in order to come to one of the 5 outcomes under KCSIE. In any event, the headteacher (CEO for central team employees) will arrange a meeting with the employee who has reported the concerns to provide an update and to discuss next steps.

8.4 Management of working relationships

Whether or not the employee's report of sexual harassment is upheld, and where the alleged harasser has not been dismissed because of the reported concern, the school/Trust will consider how best to manage any ongoing working relationship between the employee and the person concerned promptly. It may be appropriate to arrange some form of facilitated conversation, mediation and/or counselling or to change the duties, working location or line management of one or both parties by agreement. It will also be considered whether or not some form of facilitated conversation, mediation and/or counselling would be beneficial to any witnesses involved.

8.5 False information and dishonesty

The employee who raised the concern will not be disciplined or treated detrimentally because they have reported a concern of harassment and/or bullying or if their reported concern was not upheld. If there is evidence that shows or indicates that a staff member has deliberately provided false information or has acted dishonestly as part of an investigation, they may be subject to action under the VLT disciplinary policy and procedures which could result in dismissal.

Section 9: Protection and support for those involved

9.1 Retaliation or victimisation

A staff member who reports a concern of harassment and/or bullying or who participates in any investigation conducted under this policy must not suffer any form of retaliation or victimisation as a result of reporting a concern. Anyone found to have retaliated against or victimised someone in this way may be subject to the procedures in the Trust's disciplinary policy and procedures.

9.2 Definition of victimisation

Victimisation is subjecting a person to a detriment because they have:

- raised a concern (whether formally or otherwise) that someone has harassed and/or bullied them or someone else such as another staff member or third party connected to the employer;
- supported someone to make a report of harassment and/or bullying;
- given evidence in relation to a reported concern of harassment and/or bullying;
- brought legal proceedings for harassment under the Equality Act; or
- given evidence or information in connection with legal proceedings for harassment under the Equality Act.

9.3 Actions that may constitute victimisation

Victimising a person may include, but is not limited to:

- unreasonably denying their requests at work, for example annual leave requests;
- unreasonably denying them opportunities at work, for example promotions;
- bullying behaviour such as intimidation, mockery, being rude and/or dismissive;
- socially isolating them so they do not have the confidence to raise a grievance; or
- unfairly dismissing them.

9.4 Reporting retaliation or victimisation

If an employee believes they have suffered any such treatment they should inform the headteacher (CEO for central team employees). If the matter is not remedied to their satisfaction, they can raise it formally using the Trust's grievance procedures.

9.5 Disciplinary action

Anyone found to have retaliated against or victimised someone for making a report of harassment and/or bullying or assisting with an investigation under this policy may be subject to the VLT disciplinary policy and procedures.

9.6 Confidential counselling

Access to confidential counselling, which is available on request for anyone affected by, or accused of, harassment and/or bullying. The details are available in confidence from the school's HR lead in each school/the central team.

9.7 External support

Support and guidance can also be obtained from the following external services:

- The Equality Advisory and Support Service (www.equalityadvisoryservice.com)
- Protect (www.protect-advice.org.uk)
- Victim support (www.victimsupport.org.uk)
- Rape crisis (www.rapecrisis.org.uk)
- Rights of Women (England and Wales) (www.rightsofwomen.org.uk)
- ACAS (www.acas.org.uk)
- Equality and Human Rights Commission (www.equalityhumanrights.com)
- Education Support helpline - free and confidential emotional support for teachers and education staff (www.educationsupport.org.uk)

Section 10: Confidentiality, record keeping, data protection and training

10.1 Confidentiality during all procedures

Confidentiality is an important part of the procedures provided under this policy. Everyone involved in the operation of the policy, whether making a report or involved in any investigation, is responsible for observing the high level of confidentiality that is required. Details of the investigation and the names of the person raising the concern and the person accused must only be disclosed on a 'need to know' basis. Information about a concern by or about a staff member may be placed on their personal file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with the VLT data protection policy.

10.2 Retention and storage of data

As part of the application of this policy, the Trust may collect, process and store personal data in accordance with the VLT data protection policy. Requirements of Data Protection Legislation (being the UK General Data Protection Regulation and the Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time will be complied with. Records will be kept on the employee's personnel file in line with the retention policy and in line with the requirements of the Trust Data Protection policy, both of which are available via the Trust's website. Breaches of confidentiality may give rise to disciplinary action under the VLT disciplinary policy and procedures.

10.3 Training

All new staff will attend training on the staff code of conduct, which states that bullying and/or harassment is unacceptable, as part of their induction programme. It is expected that all VLT staff proactively support training and initiatives to prevent harassment and/or bullying by attending events and workshops.

Version history

First issue/revision date	Approved by	Summary of changes if not first issue
July 2025	Board of trustees	New policy

Appendix 1: Examples of unacceptable conduct

The list below includes some examples of unacceptable conduct which may constitute bullying and harassment. This is not an exhaustive list:

- unwanted physical conduct or 'horseplay' including touching, pinching, brushing past or against someone, invading their personal space, and more serious forms of physical or sexual assault (refer to separate VLT preventing sexual harassment at work policy);
- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- offensive or intimidating comments or gestures, or insensitive jokes or pranks;
- jokes or comments about an individual's age, disability, sexual orientation or religion, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- ignoring or shunning someone, for example, by deliberately excluding them from a conversation, a workplace social activity or from meetings;
- shouting at, being sarcastic towards, ridiculing or demeaning others;
- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- changing priorities and objectives unreasonably;
- unnecessary invoking of disciplinary or capability procedures;
- constantly criticising someone's work;
- inappropriate and/or derogatory remarks about someone's performance;
- abuse/undue criticism in front of students/staff;
- cyberbullying - a recognition that bullying can also take place over the internet, emails, phones etc.;
- gaslighting; and
- abuse of authority, power or status by those in positions of seniority