



# Anti-Bullying and Harassment Policy (including Cyber Bullying)

January 2022

This policy will be updated as our business changes in line with new legislation. It will be reviewed and updated as necessary, a minimum of once a year.

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MANAGING DIRECTOR

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# Contents

## **1.0 General Statement of Policy**

- 1.1 Policy Statement
- 1.2 Policy Purpose
- 1.3 Policy Development
- 1.4 Policy Review

## **2.0 Definitions**

## **3.0 Roles and Responsibilities**

- 3.1 PTP Board
- 3.2 Managing Director
- 3.3 Senior Designated Safeguarding Officer (DSO) and Deputy
- 3.4 Senior Leadership Team (SLT)
- 3.5 All Employees

## **4.0 Identifying signs**

## **5.0 Reporting bullying or harassment**

- 5.1 Learners
- 5.2 Parents
- 5.3 Staff
- 5.4 Assessment
- 5.5 Serious harm, risk of harm and repeated misconduct
- 5.6 Criminal behaviour including violence and/or harmful sexual behaviour
- 5.7 Monitoring
- 5.8 Formal complaint

## **6.0 Other Related PTP Policies**

## **7.0 Useful Websites**

## **1.0 General Statement of Policy**

### **1.1 Policy Statement**

The aim of the Anti-Bullying and Harassment Policy is to ensure that learners can learn in a supportive, caring, and safe environment without fear of being bullied.

Bullying is anti-social behaviour and affects everyone; it is unacceptable. We are committed to providing a caring, friendly, and safe environment for all our learners so they can learn in a relaxed and secure atmosphere. If bullying or harassment does occur, all learners should be able to speak out and know that incidents will be dealt with promptly and effectively.

PTP believes that it is always unacceptable for a learner to experience bullying or harassment of any kind and recognises its responsibility to safeguard the welfare of all learners by commitment to practices that protect them.

PTP maintains a zero-tolerance approach to any form of bullying or harassment, whether online and/or in person, including sexual harassment and violence, racist, sexist, and homophobic (or any other trans-related phobias) behaviour and abuse.

### **1.2 Policy Purpose**

This policy sets out PTP's commitment to our learners and provides a clear framework to fulfil that commitment in an environment where we promote safety and welfare of all. It sets out our approach to how we will deal with allegations of bullying or harassment. The Policy applies to all learners and staff, including senior managers and the board of directors, volunteers, agency staff, or anyone working on behalf of PTP. For details of PTP's approach to bullying and harassment in the workplace between staff, please refer to the Staff Handbook- Harassment and Bullying Policy (Dignity at Work).

### **1.3 Policy Development.**

PTP's Designated Safeguarding Officers, supported by the Curriculum Manager, have been charged with developing and updating this policy (and associated procedures), and to positively promote the arrangements contained within them throughout the organisation.

PTP has adopted a learner-centred and co-ordinated approach and is committed to fulfilling its responsibilities and promoting the welfare of all learners, ensuring that we have a culture of vigilance that minimises any risk of harm. Our aim is to maintain an attitude of 'it could happen here' when shaping Policy and agreeing procedures.

### **1.4 Policy Review**

The Policy will be reviewed on an on-going basis in accordance with changes to legislation. The formal review and on-going development of the policy will be led by the Senior Designated Safeguarding Officer and approved by the Managing Director.

### **Note**

The term 'learners' is used throughout this Policy to cover all ages of individuals as PTP works with post-16 learners who have left full-time education, as well as young people still in full-time education (through partnership arrangements).

## 2.0 Definitions

### **Bullying definition**

Although there is no legal definition of bullying, it can be described as unwanted behaviour from a person or group that is either:

- Offensive, intimidating, malicious or insulting
- An abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone

The bullying might:

- Be a regular pattern of behaviour or a one-off incident
- Happen face-to-face, online, in emails, calls, or texts
- Happen in-centre, or at work/ other work-related situations
- Not always be obvious or noticed by others

Examples of bullying could include:

- Physical assault
- Spreading malicious rumours
- Teasing
- Making threats
- Name-calling
- Insulting someone verbally, or through behaviour
- Sharing humiliating, offensive, or threatening comments or photos/video on social media
- Cyberbullying - bullying via mobile phone or online (for example email, social networks, and instant messenger)

### **Harassment definition**

Harassment is unwanted behaviour which you find offensive, or which makes you feel intimidated or humiliated. It can happen on its own or alongside other forms of discrimination.

Harassment may come in many forms, some of which are not always obvious to the individuals involved.

It will usually take the form of some unwanted behaviour and can include verbal, non-verbal or physical conduct which:

- Belittles someone
- Can include comments about a person's appearance, clothes, or body
- Patronises someone
- Has the purpose of degrading someone
- May involve unwelcome sexual attention or comment
- Can include the display, or sharing of, offensive or sexually explicit material
- May involve staring at a person
- Includes the deliberate exclusion of someone from work activities or discussions for any reason but especially because of their race, sex, gender orientation, disability, age or similar

The essence of harassment is that the behaviour of the individual or individuals is unwelcomed, unwanted, and not reciprocated in any way.

Harassment is unlawful discrimination under the Equality Act 2010 if it's because of or connected to one of these protected characteristics:

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

### **3.0 Roles and Responsibilities**

#### **3.1 PTP Board**

The Board recognises and supports PTP's responsibilities regarding bullying and harassment. Members will receive updates on any instances where bullying and/or harassment has been reported, and the results of any investigations.

#### **3.2 Managing Director (MD)**

Has overall and final responsibility for anti-bullying and harassment in the company, supported by the Senior Designated Safeguarding Officer (DSO) and Senior Leadership team (SLT).

#### **3.3 Senior Designated Safeguarding Officer (DSO) and Deputy**

- Is the first point of contact within PTP for referrals and information on bullying and harassment.
- Responsible for making appropriate decisions in respect of reported concerns and liaising with other external agencies as required.
- Ensures procedures as dictated by this policy are adhered to and that policy development and review takes place.
- Maintains secure records of referrals and allegations of bullying and harassment.
- Oversees the referral process and follows up any referrals made, internally and with external agencies.
- Plans, develops, and manages staff training in conjunction with HR.
- Keeps the MD up to date with anti-bullying and harassment arrangements and any policy changes required.

#### **3.4 Senior Leadership Team**

Authorised to deal with issues or concerns, along with the MD, of any reported instances of bullying or harassment should the DSO need to delegate handling of concerns to another member of staff.

#### **3.5 All employees**

Have a responsibility to promote a safe and respectful culture to learners and employers, and to co-operate with management to ensure PTP offers a safe working environment for learners. Staff have the responsibility to implement procedures to confront bullying or harassment in any form, and to listen to all parties involved in incidents.

All staff must abide by PTP's "Code of Professional Conduct" at all times.

## 4.0 Identifying signs

Some warning signs that a learner might be being bullied or experiencing harassment:

- Changes in academic performance
- Appears anxious
- Loss of self-confidence - becoming self-critical
- Regularly feeling sick or unwell
- Reluctance to come into centre or to work
- Reluctance to leave the classroom/workplace, or go to specific areas of the building
- Self-neglect in appearance and diet
- Loss of appetite. Not sleeping. Loss of weight
- Clothes/bags torn or damaged
- Money/possessions going missing
- Unexplained cuts and bruises
- Unexplained behaviour changes, e.g., moody, bad-tempered, tearful
- Unhappiness
- Not very talkative
- Person exhibiting self-harm
- Person appears frightened or behaves differently when in the presence of particular people
- Reluctant to give eye contact
- Reluctance to socialise
- Anger and aggression
- Feelings of heightened vulnerability
- Does not want to use the internet
- Nervous or jumpy when a cyber message is received

Some reasons why people bully:

- Desire to appear powerful
- Unhappiness
- Feelings of inadequacy
- Difficulties at home.
- Learned behaviour (They too have been bullied)
- Prejudice against others, in particular behaviour that is homophobic, transphobic, racist, targeted at faith, sexist, and disablist.

## 5.0 Reporting bullying or harassment

### 5.1 Learners

Learners can feel confident that any member of PTP staff will listen to them. A learner who is being bullied or harassed, or who is worried about another learner, should make a report without delay, and can do so in several ways. The learner may:

- tell their parents, their tutor, trusted member of PTP staff, or DSO either by contacting one of our training centres or by sending a confidential email to [ask@ptp-training.co.uk](mailto:ask@ptp-training.co.uk)

All reports of bullying will be taken seriously and those affected will be offered appropriate and timely support.

## **5.2 Parents**

Parents who are concerned that their child is being bullied should inform the DSO without delay, either by contacting one of our training centres or by sending a confidential email to [ask@ptp-training.co.uk](mailto:ask@ptp-training.co.uk)

## **5.3 Staff**

Staff are encouraged to report any concerns or issues, however small, to a trusted member of staff and/or the Designated Safeguarding Officer (DSO) so that appropriate and timely action can be taken, and relevant support offered. The DSO will always be informed of concerns raised.

As a matter of safeguarding concern, all incidents of bullying must be referred to the Designated Safeguarding Officer (DSO). As a matter of behaviour and discipline, all incidents of bullying must also be referred to a member of the Senior Leadership Team (SLT) who will treat it as a disciplinary issue.

The DSO may delegate handling of concerns to another member of staff who is able to offer the appropriate support but will continue to oversee the whole process.

As with all safeguarding concerns, the DSO will be responsible for dealing with both the alleged victim(s) and the alleged perpetrator(s) and developing ongoing programmes of monitoring and support as well as recording the concern, investigation, and outcome.

## **5.4 Assessment**

The DSO will investigate concerns and/or allegations by meeting with see the alleged victim(s) and (unless the case involves very serious risk of harm, threat of harm or criminal offences) any witnesses without delay, to form an initial assessment. The assessment will consider:

- the nature of the incident(s) – physical, verbal, psychological, sexual, cyberbullying
- if it is a ‘one-off’ incident involving an individual or a group
- if it is part of a pattern of behaviour by an individual or a group
- whether serious harm has been caused or risk of serious harm exists
- the likely outcomes and next steps based on the nature and level of the concerns and/or allegations: e.g., mediation, counselling and/or disciplinary action.

## **5.5 Serious harm, risk of harm and repeated misconduct**

If the DSO believes the reported incident raises serious issues of harm, possible criminal behaviour and/or repeated misconduct it will become a disciplinary matter that will be dealt with in accordance with the Safeguarding Policy.

## **5.6 Criminal behaviour including violence and/or harmful sexual behaviour**

Allegations that highlight violence and/or harmful sexual behaviour will automatically be considered as a safeguarding concern and will be dealt with in accordance with PTP’s Safeguarding Policy and Procedures, and in consultation with external agencies.

## **5.7 Monitoring**

As soon as a concern and/or allegation is raised about bullying the details will be recorded, tracked, and monitored by the DSL. This may involve sharing information with colleagues and learners.

## 5.8 Formal complaint

If the alleged victim or their parents are not satisfied with the action taken, they should be advised to make a formal complaint, according to the complaints procedure outlined in the PTP's Complaints Policy.

## 6.0 Other Related PTP Policies

- Safeguarding Policy
- Equality & Diversity Policy
- Staff Handbook- Code of Professional Conduct
- Staff Handbook- Disciplinary Procedure
- Staff Handbook- Bullying & Harassment Policy (Dignity at Work)
- Staff Handbook- Whistleblowing Policy

## 7.0 Useful Websites

<https://anti-bullyingalliance.org.uk>

<https://www.kidscape.org.uk>

<https://www.nationalbullyinghelpline.co.uk/>

<https://bulliesout.com/>