



HINDLE'S
SCHOOL OF EXCELLENCE LTD

Staff Bullying, Harassment and Sexual Harassment Policy

Hindle's School of Excellence Ltd | Academic Year 2026-27

Policy owner	Director
Applies to	Employees, workers, tutors, trainees, volunteers and job applicants
Approved by	Joanne C. Hindle, Director
Approval date	31 August 2026
Effective from	1 September 2026
Next review	1 September 2027, or sooner following legal or organisational change

Zero tolerance and positive duty

Hindle's is committed to a working environment in which everyone is treated with dignity and respect. Bullying, harassment, sexual harassment, discrimination and victimisation are unacceptable. Hindle's will take proactive steps to identify and reduce risks, respond promptly to concerns, support affected workers and take proportionate action where concerns are upheld.

1. Purpose

This policy explains how Hindle's School of Excellence Ltd ("Hindle's") prevents and responds to bullying, harassment and sexual harassment involving its workforce. It provides clear reporting, assessment, investigation, support and outcome arrangements and should be read with the Equality and Diversity, Grievance, Disciplinary, Safeguarding and Child Protection, Whistleblowing, Health and Safety, Online Safety and Data Protection policies.

The aims are to protect dignity, health, safety and wellbeing; meet equality and employment duties; prevent unlawful conduct; address inappropriate conduct before it escalates; and ensure concerns are handled fairly, confidentially and without victimisation.

2. Scope

This policy applies to employees, workers, self-employed tutors and contractors when working for Hindle's, trainee teachers, agency staff, volunteers, work-experience participants and job applicants. Employment rights may differ according to status, but the conduct standards and reporting routes apply to everyone in scope.

It covers conduct by or involving:

- colleagues, managers, directors, tutors, trainees, volunteers and contractors;
- students and former students;
- parents, carers, family members, visitors, commissioners, suppliers and other third parties;
- online contacts and people encountered through work.

It applies on Hindle's premises, at home or remote-working locations, during online teaching and communications, on visits and training, at work-related social events, during travel, and outside working hours where there is a sufficient connection to work or an impact on working relationships, safety or Hindle's operations.

3. Legal and guidance framework

This policy has been prepared with regard to current law and guidance, including:

- Equality Act 2010, including harassment, sexual harassment, victimisation and employer liability;
- Worker Protection (Amendment of Equality Act 2010) Act 2023 and the preventative duty in force from 26 October 2024;
- the strengthened requirement from 30 October 2026 to take all reasonable steps to prevent sexual harassment and the strengthened protection from third-party harassment;
- Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999;
- Protection from Harassment Act 1997;
- Employment Rights Act 1996 and the implied duty of mutual trust and confidence;
- UK GDPR and Data Protection Act 2018;
- ACAS Code of Practice on disciplinary and grievance procedures and ACAS guidance on bullying, harassment and sexual harassment;
- Department for Education, Preventing and Tackling the Bullying and Harassment of School Staff (July 2026).

Preventative duty

Hindle's will not wait for an incident before acting. Risks will be assessed and preventative measures reviewed. From 30 October 2026, this policy is intended to support the requirement to take all reasonable steps to prevent sexual harassment and relevant third-party harassment.

4. Definitions

Term	Meaning
Bullying	Unwanted behaviour from a person or group that is offensive, intimidating, malicious or insulting, or an abuse or misuse of power that

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	undermines, humiliates or causes physical or emotional harm. Bullying may be a pattern or, if sufficiently serious, a single incident.
Harassment	Unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
Sexual harassment	Unwanted conduct of a sexual nature that has the purpose or effect described above. It may be verbal, non-verbal, physical, visual or online.
Less favourable treatment	Treating someone less favourably because they submitted to, or rejected, sexual harassment or harassment related to sex or gender reassignment.
Victimisation	Subjecting someone to a detriment because they raised, supported or were believed likely to raise an equality complaint or do another protected act.
Third-party harassment	Harassment by a person who is not employed by Hindle's, such as a student, parent, visitor, commissioner, supplier or online contact.
Upward/downward bullying	Bullying can be carried out by a manager towards a worker, by a worker towards a manager, or between colleagues. Seniority does not determine whether conduct is unacceptable.

The protected characteristics relevant to workplace harassment are age, disability, gender reassignment, race, religion or belief, sex and sexual orientation. Marriage and civil partnership and pregnancy and maternity are protected in other discrimination and victimisation contexts. Hindle's will also challenge inappropriate conduct related to appearance, caring responsibilities, socioeconomic background, health, accent, working pattern or any perceived or associated characteristic.

The effect of conduct is considered as well as intent. A person may not intend to offend, but conduct can still be harassment. In deciding whether conduct has the prohibited effect, Hindle's will consider the complainant's perception, the circumstances and whether it was reasonable for the conduct to have that effect.

5. Examples of unacceptable conduct

Type	Examples
Verbal/written	Insults, threats, persistent criticism, humiliating remarks, offensive jokes, slurs, gossip, sexual comments, comments about appearance or private life, or aggressive emails.
Exclusion/undermining	Deliberate isolation, withholding necessary information, taking credit, setting someone up to fail, removing responsibilities without reason, or repeatedly ignoring contributions.
Abuse of authority	Unreasonable threats, coercion, impossible deadlines, arbitrary changes, excessive monitoring, misuse of appraisal or capability processes, or pressuring a person to stay silent.
Physical/sexual	Unwanted touching, invading personal space, sexual gestures, displaying sexual material, propositions, pressure for dates or sexual contact, stalking or assault.
Online	Abusive messages, group-chat exclusion, impersonation, harmful posts, sharing images or personal data without consent, cyberstalking, pile-ons or AI-generated abusive/sexual material.
Third-party	Threats, abuse, sexist/racist/disablist or sexual conduct from a student, parent, visitor, commissioner or member of the public.
Retaliation	Reducing hours, excluding, threatening, criticising, giving poor references or otherwise disadvantaging someone because they raised or supported a concern.

The examples are not exhaustive. Conduct may breach this policy even where it does not meet the legal definition of harassment.

6. What is not normally bullying

Reasonable and proportionate management action is not bullying merely because it is unwelcome. This can include setting objectives, allocating work, monitoring performance, giving constructive feedback, addressing conduct, applying policies, refusing leave for legitimate reasons, changing duties after consultation or taking disciplinary or capability action.

Management action must still be carried out respectfully, consistently, without discrimination and with reasonable support. Repeatedly humiliating a worker, using threats, applying unjustified pressure or misusing a formal process may amount to bullying.

7. Roles and responsibilities

7.1 Director and managers

- Set a respectful culture and communicate that bullying and harassment will not be tolerated.
- Assess workplace and third-party risks, implement preventative steps and record reviews.
- Model appropriate behaviour and challenge inappropriate conduct, including “banter”.
- Respond promptly, impartially and sensitively to reports.
- Avoid conflicts of interest and appoint an independent investigator where necessary.
- Protect complainants, respondents and witnesses from retaliation.
- Take safeguarding action where conduct may affect children or adults at risk.
- Monitor patterns, training, outcomes and policy effectiveness.

7.2 All workers and volunteers

- Treat others with dignity and consider the effect of words and actions.
- Do not participate in, encourage, share or ignore bullying or harassment.
- Cooperate with risk controls, training and investigations.
- Report concerns promptly and preserve relevant evidence.
- Maintain confidentiality and avoid retaliation or malicious gossip.
- Intervene safely or seek help when witnessing inappropriate conduct.

7.3 Bystanders and witnesses

A witness may check in with the affected person, record what they observed, challenge conduct if safe and report it. Hindle's will protect witnesses from victimisation. A worker does not need the affected person's permission to report a serious safety, safeguarding or criminal concern.

8. Prevention and risk assessment

Hindle's will take a proactive, organisation-wide approach. Preventative measures will be proportionate to its size and risks and may include:

- a written sexual-harassment and third-party-harassment risk assessment, reviewed at least annually and after incidents;
- induction and refresher training for all staff, with additional training for managers and investigators;
- clear standards for staff, students, parents, visitors and online communications;
- safe lone-working, home-tuition, evening-working, social-event and online-teaching arrangements;
- more than one reporting route and access to an independent investigator when internal impartiality is not possible;
- monitoring anonymous themes, grievances, exit feedback, absence, turnover and repeated concerns;
- prompt action when early warning signs, inappropriate banter or boundary concerns arise;
- reasonable adjustments and accessible reporting for disabled staff;
- contractual expectations for contractors and clear responses to third-party misconduct.

9. Reporting a concern

Immediate danger

Call 999 if anyone is in immediate danger or a crime is in progress. Staff should move to safety and notify the Director as soon as possible. Non-emergency police matters may be reported on 101.

A worker may raise a concern verbally or in writing with the Director. The report should, where possible, include what happened, dates, locations, people involved, witnesses, impact, steps already taken and relevant evidence. A worker may be accompanied at formal meetings in accordance with the applicable procedure.

If the concern involves the Director, or the Director cannot act impartially, the complainant should state that the matter requires an independent route. Hindle's will appoint an external HR adviser or other suitably competent independent person to receive or investigate it. The subject of a complaint will not investigate or decide their own case.

Anonymous reports will be considered, although anonymity may limit the action possible. Hindle's will consider seriousness, credibility, evidence, safety and whether other sources can corroborate the concern.

10. Informal resolution

Where the conduct is lower-level, the worker feels safe and all parties agree, an informal approach may be appropriate. Options include explaining that the conduct is unwelcome, asking a manager to raise it, facilitated discussion, coaching, agreed boundaries or mediation.

Informal resolution is voluntary and will not be imposed in cases involving sexual harassment, violence, coercion, serious power imbalance, safeguarding, repeated behaviour or potential criminal conduct. A worker may move to the formal procedure at any time. Informal action will be recorded proportionately.

11. Formal procedure

1. Acknowledge the complaint promptly and identify immediate safety, safeguarding, wellbeing and conflict-of-interest issues.
2. Appoint an impartial investigator who has not been involved in the events. For a small organisation, this may be an external investigator.
3. Set terms of reference, explain the process and expected timescale, and keep parties updated if delays arise.
4. Meet separately with the complainant, respondent and relevant witnesses and consider documents, messages, CCTV or other lawful evidence.
5. Give the respondent sufficient detail and a fair opportunity to respond.
6. Apply the balance of probabilities and produce a factual investigation report.
7. A decision-maker who is impartial, and preferably different from the investigator, determines the outcome and next steps.
8. Confirm relevant outcomes in writing, while protecting confidential information about others.
9. Offer a review or appeal route under the grievance or disciplinary procedure.

Safeguarding, police, regulatory or health-and-safety action will not be delayed by an internal process. Hindle's may pause or coordinate aspects of its investigation to avoid prejudicing an external investigation, while maintaining protective measures and support.

12. Interim and protective measures

Hindle's may take neutral, temporary measures while a concern is assessed. These are not disciplinary findings and will be reviewed regularly. Measures may include:

- temporary reporting-line, timetable, location, communication or duty changes;
- no-contact arrangements;
- increased supervision or two-person working;
- adjustments to student, parent or visitor contact;
- remote work, paid suspension or alternative duties where justified;
- security measures, platform controls or police advice;
- reasonable adjustments, time off for appointments or wellbeing support.

Where possible, arrangements will not disadvantage the person who reported harm. Paid suspension will be used only where necessary and kept under review.

13. Outcomes and action

Where a complaint is upheld, action will be proportionate to seriousness, impact, intent, repetition, power imbalance, mitigation, risk and any previous conduct. It may include training, coaching, a written conduct agreement, management instruction, mediation where safe, apology, changes to duties or contact, disciplinary action up to dismissal, termination of a contractor or volunteer arrangement, exclusion of a visitor, restrictions on parent/student contact, safeguarding referral or police report.

Where the evidence does not meet the balance of probabilities, Hindle's may still take reasonable steps to restore working relationships, address risk, clarify expectations or provide support. An unsubstantiated complaint is not automatically false or malicious.

14. Third-party harassment and abuse

Hindle's will take reports involving students, parents, carers, visitors, commissioners, suppliers or online contacts as seriously as staff-to-staff concerns. Workers are not expected to tolerate abuse as "part of the job".

- Set and communicate behaviour standards and consequences.
- Assess foreseeable risks by role, location, student need, lone working and online contact.
- Provide safe exit, escalation and incident-reporting arrangements.
- Change contact arrangements or require another adult to be present.
- Issue warnings, restrict access, change the point of contact or end non-essential contact.
- Work with the commissioning body, safeguarding partners or police where appropriate.
- Support the worker and review controls after every serious incident.

15. Sexual harassment

Hindle's has a positive duty to prevent sexual harassment. Consent to one form of interaction does not imply consent to another, and a previous consensual relationship does not remove the right to

reject later conduct. Alcohol, social events, messaging outside work and remote communication remain within scope where connected to work.

Reports will be handled sensitively. The complainant will not be required to confront the respondent or use mediation. Relevant risks include lone working, power imbalances, social events, intimate or sexualised conversations, private messaging, work with young people, image sharing and harassment by third parties.

16. Safeguarding and allegations concerning children

If information suggests that an adult may have harmed a child, committed an offence against a child, posed a risk of harm, or behaved in a way indicating they may be unsuitable to work with children, the Safeguarding and Child Protection Policy and allegations procedures take priority. The Designated Safeguarding Lead and, where required, the Local Authority Designated Officer (LADO), Disclosure and Barring Service, commissioning body or police will be contacted. Internal employment action will be coordinated without compromising child protection.

17. Support and wellbeing

Hindle's will discuss reasonable support with the complainant, respondent and witnesses. Support may include a named contact, adjustments, check-ins, occupational-health or GP advice, counselling signposting, union or companion support, time away from immediate contact, and review of workload or working arrangements. Support does not imply a finding for or against any person.

18. Confidentiality, records and data protection

Information will be limited to those who need it for safety, investigation, decision-making, support or legal duties. Absolute confidentiality cannot be guaranteed, and a respondent must normally receive enough information to answer the concern. Participants must not post about or discuss the case unnecessarily.

Records will distinguish allegations, evidence, findings and professional judgement and will be stored securely in accordance with retention and data-protection requirements. Audio recording of meetings is not permitted unless agreed as a reasonable adjustment or authorised in advance.

19. Victimisation, retaliation and malicious allegations

No person will suffer retaliation for raising, supporting or participating in a concern in good faith. Retaliation may itself be misconduct, victimisation or unlawful harassment. Managers will check for subtle detriment such as exclusion, reduced hours, changed opportunities, poor references, gossip or hostile treatment.

A complaint that is not upheld is not malicious. Disciplinary action will be considered only where there is clear evidence that a person knowingly fabricated a material allegation or evidence with the intention of causing harm. A mistaken, incomplete or uncorroborated account will not be treated as malicious.

20. External advice and reporting

Contact	Details
Hindle's School of Excellence Ltd	115 Rochdale Road, Bury BL9 7BA 0161 764 2415
Emergency services	999 - immediate danger or a crime in progress
Police non-emergency	101
ACAS Helpline	0300 123 1100 acas.org.uk
Equality Advisory and Support Service	0808 800 0082 equalityadvisoryservice.com
Health and Safety Executive	hse.gov.uk - workplace health and safety guidance
NSPCC Whistleblowing Advice Line	0800 028 0285 - concerns about child-protection practice

Nothing in this policy prevents a worker from contacting a trade union, ACAS, a legal adviser, police, regulator or safeguarding agency, or from making a protected disclosure. Statutory time limits may continue to run while an internal process is ongoing.

21. Monitoring and review

The Director will review incident themes, affected groups, sources of third-party risk, working locations, training completion, sickness absence, turnover, complaints and outcomes. Data will be anonymised where possible. The sexual-harassment and third-party-harassment risk assessment will be reviewed at least annually and after significant incidents, organisational change or new guidance.

This policy will be reviewed by 1 September 2027 and earlier if required. It does not form part of any contract of employment and may be updated following consultation and legal advice.

22. Approval

Signed: Joanne C. Hindle MA PGDE BA (Hons)

Role: Director of Hindle's School of Excellence Ltd

Address: 115 Rochdale Road, Bury BL9 7BA

Date approved: 31 August 2026

Date effective: 1 September 2026

Next review: 1 September 2027

Reference documents

- Department for Education, Preventing and Tackling the Bullying and Harassment of School Staff (9 July 2026).

- ACAS, Bullying at Work; Sexual Harassment; and Handling Bullying and Discrimination Complaints.
- Equality Act 2010.
- Worker Protection (Amendment of Equality Act 2010) Act 2023.
- Employment Rights Act changes taking effect from 30 October 2026.