



BRACKNELL FOREST COUNCIL

ANTI-BULLYING & ANTI-HARASSMENT POLICY

Version	V4
Changes to Version 4	<ul style="list-style-type: none"> Expanded content to reflect forthcoming legislative changes, including the anticipated requirement from 30 October 2026 to take <i>all reasonable steps</i> to prevent sexual harassment. Added reference to the forthcoming duty to prevent third-party harassment arising in the course of employment. Expanded prevention requirements, including risk assessments covering third-party contact and further preventative measures as outlined in the <i>"Guidance for Schools on the New Duty Relating to Prevention of Sexual Harassment in the Workplace."</i> Strengthened responsibilities for managers and senior leaders to identify, reduce and record risks and preventative actions. Expanded third-party complaints guidance, including expected standards of behaviour, reporting, support and proportionate safeguards.
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Anti-Bullying & Anti-Harassment Policy

1 Introduction

The school is committed to fostering a safe, respectful, and inclusive workplace where all staff are treated with dignity and respect, and where everyone feels valued, supported and able to contribute fully.

The school is committed to taking reasonable steps, and where required all reasonable steps, to prevent bullying, harassment including sexual harassment, victimisation and discrimination, and to maintaining a working environment that is free from intimidation, hostility, humiliation and offensive behaviour.

This policy outlines how we address bullying and harassment, ensuring all concerns are handled fairly and sensitively.

Everyone working in or visiting the school—including staff, contractors, agency workers, and volunteers—is expected to uphold these standards. If you experience or witness inappropriate behaviour, please report it with confidence that it will be taken seriously and managed discreetly.

2 Equality

We are committed to promoting equality, diversity, and inclusion across our workforce, and to eliminating unlawful discrimination. We want every colleague to feel respected as an individual and valued for their unique contributions.

Our goal is to build a team that reflects the diversity of our school and wider society, where everyone feels empowered to do their best.

We also extend this commitment to the broader school community, as outlined in our Equality and Dignity at Work policy, which champions equity, inclusion, and respect for all.

3 Purpose

This policy sets clear expectations for staff behaviour and aims to create a safe, inclusive working environment where everyone is treated with dignity and respect. Bullying, harassment, or any form of discrimination will not be tolerated.

4 Principles

Commitment to a Safe and Inclusive Workplace

The school is committed to providing a safe, respectful, and inclusive working environment, free from bullying, harassment, victimisation, and unlawful discrimination. This applies to interactions with colleagues, contractors, members of the public, and the wider school community.

Bullying and harassment—whether verbal, physical, emotional, or digital—will not be tolerated. All complaints will be taken seriously, investigated promptly and confidentially, and addressed in line with agreed procedures. Breaches of this policy may result in

disciplinary action, including suspension or dismissal, regardless of whether a formal complaint is raised.

Expectations and Responsibilities

This policy defines unacceptable behaviours, outlines reporting procedures, and details the steps the school will take to investigate and resolve incidents. All staff are expected to:

- Model respectful behaviour and avoid contributing to or condoning inappropriate conduct.
- Cooperate fully with any investigations or complaints procedures.
- Be aware of their responsibilities under this policy and the potential consequences of misconduct.

Protection from Sexual Harassment

The school has a duty to protect staff from sexual harassment by colleagues, contractors, parents, visitors, or any member of the school community. All staff have the right to be treated with dignity and respect. Sexual harassment will be treated as a disciplinary offence and may result in suspension or dismissal. Abuse of power will be considered when determining disciplinary outcomes.

Staff are encouraged to report any incidents to their line manager or the headteacher.

All staff will be made aware of this policy and are expected to comply fully.

The school will carry out a prevention of sexual harassment risk assessment to ensure that robust measures are in place to safeguard staff and the wider community.

The prevention of sexual harassment risk assessment will consider risks arising from staff-to-staff interactions and third-party contact, including contact with parents, carers, visitors, contractors, agency workers, volunteers, pupils, service users, members of the public and other individuals encountered through work. Risk assessments should include, where relevant, lone working, one-to-one meetings, parent or carer meetings, off-site visits, school trips, evening events, home visits, staff social events, online communications, visitor-facing roles, power imbalances, isolated working areas and situations where staff may be exposed to unacceptable conduct from third parties.

Our Commitment

The school commits to:

- Creating a workplace that promotes dignity, respect, and inclusion.
- Recognising and valuing individual differences and contributions.
- Raising awareness of rights and responsibilities under this policy.
- Ensuring staff understand that both they and the school may be held accountable for acts of bullying, harassment, victimisation, or discrimination in the course of employment.

5 Scope and communication of the policy

This policy applies to all staff working for the school in any capacity, including permanent, temporary, and agency staff, as well as volunteers, interns, and those working off-site.

It may be communicated through various channels, including team briefings, departmental meetings, internal publications, and other appropriate methods to ensure all staff are aware of its contents and expectations.

Complaints involving the Headteacher or a Governor should be submitted in writing to the Clerk to the Governing Body via the school office or email, clearly marked 'Private and Confidential.'

If the complaint concerns the Chair of Governors, it may be referred to the Vice-Chair or another suitably experienced governor.

6 Bullying

6.1 Definition of Bullying

Workplace bullying refers to unreasonable behaviour intended to undermine, intimidate, or harm an individual or group. It may be deliberate or unintentional, and can occur in various forms, including:

- Verbal abuse – insults, teasing, or derogatory remarks
- Physical abuse – hitting, pushing, or other aggressive actions
- Social exclusion – intentionally excluding someone from work-related activities
- Cyberbullying – using digital platforms to harass or intimidate

Bullying is any unwanted behaviour that is:

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

It may be:

- A one-off incident or a repeated pattern
- Carried out face-to-face, via email, phone, social media, or other digital means
- Not always visible or recognised by others

Unawareness or lack of intent does not excuse bullying behaviour.

Examples of bullying include:

- Persistent criticism of someone's work
- Spreading harmful rumours
- Undermining someone in meetings
- Assigning unfair workloads
- Excluding colleagues from team activities
- Posting offensive or threatening content online

6.1.1 Upward Bullying

Bullying can also be directed towards senior staff, known as *upward bullying*. This may come from one or more employees and can include:

- Ongoing disrespect or defiance
- Refusal to complete tasks
- Spreading rumours
- Undermining authority
- Actions that portray a leader as incompetent

Senior staff may find it difficult to recognise upward bullying. It's important to explore underlying causes, such as team culture or broader organisational issues.

Bullying and harassment can occur through various channels—face-to-face, written communication, phone calls, texts, messaging apps (e.g. WhatsApp), or social media platforms (e.g. Facebook, Instagram, X). Any behaviour that negatively impacts an individual's safety, wellbeing, or job performance is unacceptable.

Incidents may be isolated or part of a pattern, and may involve individuals or groups.

7 Harassment

Under the Equality Act 2010, harassment in the workplace is defined in three categories:

1. Harassment related to protected characteristics
2. Sexual harassment
3. Less favourable treatment due to submission to or rejection of sexual harassment or harassment related to sex or gender reassignment

In serious cases, harassment may also constitute a hate crime.

7.1 Harassment Related to Protected Characteristics

Harassment is unlawful when it relates to the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation

It involves *unwanted conduct* that has the purpose or effect of:

- Violating a person's dignity
- Creating an intimidating, hostile, degrading, humiliating, or offensive environment

This applies whether the behaviour:

- Was intended to cause harm or not
- Had the described effect or was intended to have it

Legal assessment considers:

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- The context of the behaviour
- The perception of the person affected
- Whether it is reasonable for the person to feel harassed

Harassment may also apply if someone:

- Is perceived to have a protected characteristic
- Is associated with someone who has a protected characteristic
- Witnesses harassment that affects their own dignity or environment

Note: The law does not define harassment for *marriage and civil partnership* or *pregnancy and maternity*, but poor treatment based on these may still be considered direct discrimination.

7.1.1 Unwanted Behaviour

Unwanted behaviour may include:

- A serious one-off incident
- Repeated actions
- Spoken or written words, images, graffiti, gestures, mimicry, jokes, pranks, or physical actions

Such behaviour may leave the individual feeling:

- Disrespected
- Frightened
- Humiliated
- Insulted
- Intimidated
- Threatened

It is unlawful even if the person being harassed does not explicitly ask for the behaviour to stop.

7.1.2 If You Witness Harassment

All staff have a responsibility to help prevent harassment. If you witness harassment, report it to an appropriate manager or the headteacher.

Managers must act on any concerns raised or observed. They should begin by discussing the incident with the affected colleague to determine whether they wish to raise a formal complaint. If not, refer to **Section 9** for further guidance.

7.1.3 If You Are Being Harassed

If you believe you are being harassed or bullied:

- Make a written record of the incident(s) as soon as possible, including what was said or done
- This record can support any future action or formal complaint

7.2 Sexual Harassment

Sexual harassment is defined as unwanted behaviour of a sexual nature that:

- Violates a person's dignity, or
- Creates an intimidating, hostile, degrading, humiliating, or offensive environment

This applies regardless of intent—behaviour may be considered harassment even if the perpetrator did not intend harm, or if the behaviour did not result in the intended effect.

Protection under the Equality Act 2010 extends to:

- Employees and workers
- Contractors and self-employed individuals hired to do work personally
- Job applicants

Sexual harassment does not need to be linked to a protected characteristic such as sex or sexual orientation.

It can occur:

- In any workplace setting (e.g. offices, toilets, meeting rooms, breakout areas)
- Outside the workplace (e.g. school trips, training, conferences, staff events)
- Through any medium—face-to-face, written communication, phone, email, social media, or messaging platforms
- In public or private settings

Examples of sexual harassment include:

- Sexual remarks, gestures, or comments about someone's appearance or clothing
- Displaying or sharing sexual images or content
- Sexual jokes or comments, including those about sexual orientation or gender identity
- Unwelcome sexual advances, propositions, or physical contact
- Promises of reward in exchange for sexual favours
- Intrusive questions or discussions about someone's sex life
- Sexual rumours or posts on social media
- Sending sexually explicit messages or images
- Unwelcome touching, hugging, or kissing
- Predatory behaviour, coercion, or stalking
- Upskirting or other forms of invasive behaviour
- Sexual assault or rape (note: rape is a separate criminal offence)

Sexual harassment can affect anyone—regardless of gender identity or sexual orientation—and may be perpetrated by:

- Colleagues
- Managers or supervisors
- High-profile individuals
- Members of the school community (e.g. parents, visitors)
- Pupils or members of the public

Even if not directed at a specific individual, a culture of inappropriate behaviour (e.g. sharing sexual content) may still constitute harassment.

Important: Consensual sexual interaction is not harassment. However, previously welcomed behaviour can become unwanted and therefore constitute harassment.

Workplace culture and 'banter':

Behaviour considered joking or part of workplace culture may still be harassment if it is:

- Sexual in nature
- Unwanted
- Violates dignity or creates a hostile environment

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The school recognises that such behaviour may not always be intentional. Staff are encouraged to address poor behaviour directly and respectfully when it occurs. The school will support this by clearly communicating expected standards and responsibilities.

7.2.1 Legal Duty to Prevent Sexual Harassment

The school is committed to meeting its legal obligations to prevent sexual harassment in the workplace and to safeguarding staff from harassment arising in the course of employment.

This includes compliance with the Equality and Human Rights Commission (EHRC) 2024 guidance as outlined in the document- *“Guidance for Schools on the New Duty Relating to Prevention of Sexual Harassment in the Workplace.”*

The school recognises that the legal framework on workplace harassment is changing. The current duty requires employers to take reasonable steps to prevent sexual harassment of workers in the course of employment. Forthcoming legislative changes are expected to strengthen this duty so that, from 30 October 2026, employers will be required to take *all reasonable steps* to prevent sexual harassment. The changes are also expected to introduce a duty to prevent harassment of employees by third parties where this arises in the course of employment.

To reflect these forthcoming changes, the school will adopt a proactive and preventative approach. This means identifying how harassment could occur within school settings, including from third parties, assessing the level of risk, putting proportionate control measures in place, recording the steps taken, and reviewing those measures regularly. The school will also keep this policy, associated risk assessments, training records, communication arrangements and preventative action plans under review to ensure they remain appropriate, effective and legally compliant.

7.3 Less Favourable Treatment Due to Harassment

This occurs when someone is treated unfairly because of how they responded to previous harassment—whether they rejected or accepted it. It applies to:

- Sexual harassment
- Harassment related to sex
- Harassment related to gender reassignment

7.4 Whistleblowing Protection Relating to Sexual Harassment

From 6 April 2026, reports of sexual harassment are legally recognised as a “qualifying disclosure” under whistleblowing legislation.

This means that any worker or employee who raises concerns about sexual harassment in good faith is protected by law from retaliation. In particular:

- **Protection from unfair dismissal:**
Where an individual with employee status is dismissed because they have raised a whistleblowing disclosure about sexual harassment, the dismissal will be treated as an automatic unfair dismissal under employment law.

- **Protection from detriment:**

Individuals must not suffer any detriment as a result of making a disclosure.

Detriment includes:

- Being treated worse than before; and/or
- Having their working conditions, role, or situation made worse in any way.

The school is committed to supporting individuals who raise concerns about sexual harassment and will not tolerate any form of retaliation against those who do so. Any concerns raised under this protection will be handled seriously, confidentially, and in line with the school's whistleblowing, anti-harassment, and safeguarding procedures.

7.5 Witnessing Sexual Harassment

If you witness sexual harassment at work and feel safe to do so, you may intervene.

Afterwards, you can:

- Support the affected person's complaint
- Report what you saw
- Provide evidence as a witness
- Make your own complaint if the behaviour affected your dignity or created a hostile environment

You don't need the victim's permission to report it. You must not be penalised for reporting or supporting a complaint.

7.5.1 Deciding Whether to Report or Complain

Speak with the person affected to see if they want support. You can also seek advice from:

- A trusted colleague or manager
- A trade union representative

7.5.2 Prevention Measures

The school takes steps to prevent sexual harassment and other forms of harassment related to protected characteristics, including harassment by third parties, such as:

- Promoting respectful management practices
- Conducting risk assessments (e.g. lone working, visitor-facing roles, and situations involving third party contact.)
- Raising awareness through training and induction
- Providing HR support for handling complaints
- Offering confidential support and clear reporting routes
- Improving diversity and inclusion across the organisation
- Reviewing incident data, informal concerns, grievances, exit information and staff feedback to identify patterns or areas of increased risk.
- Making clear to third parties, where appropriate, that harassment, discrimination, intimidation or abusive behaviour towards staff will not be tolerated and may result in action such as ending a meeting, asking the individual to leave, restricting contact, reporting the matter to relevant authorities or using the school complaints procedure.

8 Roles and Responsibilities

8.1 Managers and Senior Leaders

Managers and senior leaders must ensure staff understand this policy and their responsibilities. They are accountable for maintaining a respectful workplace and must:

- Challenge unacceptable behaviour
- Take all complaints seriously and respond promptly and fairly
- Clearly explain the complaint process
- Ensure thorough investigations, with HR support as needed

Managers and senior leaders must also take proactive steps to identify and reduce risks of bullying, harassment and sexual harassment. This includes ensuring relevant risk assessments are completed and reviewed, acting on patterns or early warning signs, making sure agreed control measures are implemented, and keeping appropriate records of actions taken.

If a complaint is made but not pursued, the headteacher should keep a record and check in periodically. In serious cases, action may be taken to protect staff, even without a formal complaint. Failure to act on known harassment may result in disciplinary action.

8.2 Staff Responsibilities

All staff must help maintain a respectful, safe workplace. This includes:

- Understanding what constitutes sexual harassment
- Being mindful of their behaviour
- Following the policy and cooperating with investigations
- Challenging inappropriate behaviour when safe to do so
- Supporting or reporting incidents of harassment

Staff should report harassment whether they experience or witness it, as soon as possible so that action can be taken to safeguard all parties.

8.3 Trade Union Involvement

Union reps can support members experiencing harassment. Staff are encouraged to seek help from their union if needed.

The school supports union efforts to raise awareness and tackle harassment. It recognises that sexual harassment often intersects with gender and other inequalities, and is committed to working with unions to improve workplace equality and diversity.

9 Reporting bullying and harassment

Bullying and harassment can be addressed informally or formally. If you experience or witness it, raise the issue promptly.

You don't need to be the target to make a complaint—everyone has a responsibility to help tackle it.

Reports can be made by:

- The person affected
- A witness

Some individuals may not realise their behaviour is harmful. In such cases, pointing it out may resolve the issue. This policy supports both informal and formal approaches to handling complaints.

9.1 Informal Resolution

If you feel comfortable, you may try to resolve bullying or harassment informally. This could involve:

- Speaking directly to the person involved and explaining how their behaviour affects you
- Asking a manager, senior leader, or the headteacher to speak to them on your behalf
- Discussing the issue with a trusted colleague, manager, or union rep for advice

If your concern involves the headteacher, raise it with the Chair of Governors.

If the issue is serious or unresolved, you can proceed with a formal grievance. All discussions must remain confidential.

If you feel unsafe, speak to your manager or the headteacher as soon as possible.

9.2 Formal Procedure - Raising a Grievance

If informal steps don't resolve the issue or the matter is serious, raise a formal grievance under the school's grievance policy.

- Complaints about external individuals (e.g. visitors or parents) should follow the school's complaints procedure.
- For agency workers, the headteacher or line manager should notify the agency to take appropriate action.

All allegations will be investigated thoroughly. Breaches of this policy may lead to disciplinary action, including warnings, suspension, or dismissal. Abuse of power will be considered when deciding outcomes.

If a manager identifies a potential disciplinary offence, they may initiate an investigation.

If disciplinary action follows a grievance, it may begin at Stage 1 or 2, depending on prior investigation.

To protect those involved, the school may adjust duties, work patterns, or locations.

Confidentiality will be maintained, and all parties will receive a fair hearing. Breach of confidentiality may result in disciplinary action.

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Where necessary, the school may suspend the accused during the investigation. If the complaint is upheld, immediate action will be taken to stop the behaviour and prevent recurrence, including a risk assessment.

Staff are protected from retaliation for reporting or supporting a complaint. Retaliation is a disciplinary offence.

For serious sexual harassment allegations:

- If the behaviour may be criminal (e.g. assault, stalking), the headteacher should advise the complainant to contact the police and offer support.
- If there's an immediate risk, the school may contact the police directly and inform the complainant.
- The school will work with the police to ensure a fair disciplinary process.

9.2.1 Third party complaints

The school recognises its duty to protect staff from harassment by third parties encountered through work. Third parties may include parents, carers, visitors, contractors, self-employed consultants, agency workers, volunteers, pupils, service users, members of the public and individuals attending school events or communicating with staff online.

From 30 October 2026, the school may be liable where an employee is harassed by a third party in the course of employment unless the school has taken all reasonable steps to prevent that harassment. This applies to harassment related to protected characteristics as well as sexual harassment.

Preventative steps may include assessing third-party harassment risks, communicating expected standards of behaviour to visitors and the wider school community, training staff on reporting and de-escalation, recording incidents and action taken, reviewing repeat concerns, and considering proportionate contact restrictions or other safeguards where necessary.

If a staff member reports harassment or discrimination from a third party, the priority is to ensure they feel safe and supported.

Steps to follow:

- Speak with the affected person to offer support and gather details compassionately
- Make clear that such behaviour is unacceptable and may result in the person being asked to leave the premises
- If the behaviour is discriminatory, it may be a hate crime and should be reported to the police or online:

Report Hate Crime: <https://www.gov.uk/report-hate-crime>.

Thames Valley police website:

<https://www.thamesvalley.police.uk/ro/report/ocr/af/how-to-report-a-crime/>

If the victim chooses not to report it, a witness should do so.

Support:

- Ongoing management support should be provided
- Additional help is available via Victim Support <https://www.victims-first.org.uk/>

10 When is it a Crime?

If a staff member experiences harassment, assault, or sexual assault—especially if serious or involving a third party—they may choose to report it to the police.

In some cases, the school may need to notify the police. This should be discussed with the individual beforehand.

Staff may wish to report incidents if:

- There's an ongoing risk to their safety or others
- They are considered vulnerable (e.g. due to mental health)

Police involvement does not prevent the school from conducting its own investigation under the disciplinary policy. HR advice should be sought in such cases.

11 Employee Support

The school recognises that bullying, harassment, and sexual harassment can impact mental and physical health and job performance. Support will be offered without discrimination.

Staff can access the school's confidential 24/7 counselling service. No information is shared without written consent. Reasonable paid time off is available for those attending counselling due to sexual harassment.

Further information can be accessed here:

<https://www.bracknell-forest.gov.uk/jobs/staff-benefits/staff-counselling>

Additional support is available from:

- Education Support www.educationsupport.org.uk
- [Acas helpline](#)
- [Equality Advisory and Support Service \(EASS\)](#)

If a complaint is not upheld or results in action short of dismissal, mediation or redeployment may be offered to support those affected.