



DIGNITY AT WORK POLICY (bullying, harassment, sexual harassment and victimisation)

September 2026

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1. Statement of principles

- All members of the Trust's workforce (as defined in section 2) have a right to be treated with dignity and respect in the workplace
- Workplace harassment (including sexual harassment), bullying and victimisation are totally unacceptable and the Trust encourages any staff who believe that they may have been the victim of any of these, to make a formal or informal complaint to the appropriate person set out in this policy.
- No member of the Trust's workforce should have to tolerate harassment (including sexual harassment), bullying or victimisation from colleagues, pupils, members of the public, or other individuals they may encounter at work, or on Trust's trips/from a third party
- The Trust recognises that any member of the Trust's workforce can be subjected to these forms of behaviour
- The Trust will assess whether harassment (including sexual harassment), bullying or victimisation may have occurred based on the impact of the action(s) on the victim rather than the intent of the alleged perpetrator
- The Trust will not base decisions about handling harassment (including sexual harassment), bullying or victimisation on whether someone submitted to or rejected a particular instance of harassment, bullying or victimisation
- The Trust strives for a workplace that's free of harassment (including sexual harassment), bullying and victimisation through:
 - Raising awareness of the issues of harassment (including sexual harassment), bullying and victimisation, and refusing to tolerate these behaviours
 - Supporting any member of the Trust's workforce who is harassed (including sexual harassment), bullied or victimised
 - Dealing with any issues through agreed processes when they are raised
 - Ensuring that senior leaders demonstrate and uphold high standards of conduct
 - Undertaking a risk assessment and maintaining a review of that process to monitor any issues that may be present and require addressing
 - Ensuring that that all staff have training on and are made aware of the provisions of this policy
 - Encouraging any staff who believe that they may have been subjected to harassment (including sexual harassment), to raise any such issue knowing that any such issue will be treated seriously, sensitively and with the importance that such complaints deserve.

2. Legislation and guidance

This policy is based on the Acas guidance on [discrimination, bullying and harassment at work](#).

This policy follows the principles of the:

- [Equality Act 2010](#) and amendments made in October 2024
- [Protection from Harassment Act 1997](#) (which makes provision for protecting individuals from harassment and similar conduct)
- [Employment Rights Act 1996](#) (which is particularly relevant if the Trust's is considering a dismissal)
- [Employment Relations Act 1999](#) (where a dispute progresses to an employment tribunal)

- The Worker Protection (Amendment of Equality Act) Act 2023
- NEU: [Preventing sexism & sexual harassment | National Education Union](#)
- GMB: [Sexual Harassment Policies | GMB Union](#)
- Unison: [589_sexual-harassment-guide-Oct24.pdf](#)
- ACAS www.acas.org.uk

Where it becomes necessary to bar an individual from one or more of the Trust's premises, we will refer to the [guidance on controlling access to Trust's premises](#) from the Department for Education (DfE).

This policy is designed to protect all current and former members of the Trust's workforce.

For the purposes of this policy, the term 'Trust's workforce' includes:

- Employees
- Agency workers
- Consultants
- Casual workers
- Interns
- Apprentices
- Volunteers, including governors

This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Definitions

All forms of harassment (including sexual harassment), bullying or victimisation may consist of either a single act or a continuous pattern of behaviour. The individual making the complaint usually defines what they mean by harassment (including sexual harassment), bullying or victimisation in a given context, where something has happened to them that is unwelcome, unwarranted and causes a detrimental effect.

For the avoidance of doubt, it should be noted that the Trust's definition of harassment is wider than that set out in the appropriate legislation and just because behaviour complained of may not come within the statutory definition of harassment as set out in paragraph 3.1 does not mean that any such complaint will not be dealt with or appropriate action taken in the event that any such behaviour is found to have been established.

If a member of the Trust's workforce reports that they are being bullied, harassed (including sexual harassment), or victimised, then they have a complaint which must be dealt with, regardless of whether or not it accords with a standard definition.

3.1 Harassment

Harassment, as defined in the Equality Act 2010, is:

Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

The unwanted conduct may be physical, verbal or non-verbal. A single incident can amount to harassment.

The relevant protected characteristics defined in the Equality Act 2010 are:

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

The individual making the complaint does not need to be the intended target or possess the relevant characteristic themselves.

An individual may find the behaviour offensive even if it is not directed at them, or they may be:

- Associated with a person who has a protected characteristic
- Wrongly perceived to have a protected characteristic
- Treated as if they have a protected characteristic

Harassment may also occur where there is unwanted conduct of a sexual nature or that relates to sexual orientation or gender reassignment or sex. This conduct has the same purpose or effect described at the beginning of this section (3.1) and the individual is treated less favourably because they rejected or submitted to it.

Harassment is unacceptable, and may still be considered and addressed under this policy even if it does not fall within any of the defined categories above.

3.2 Sexual Harassment

The Equality Act 2010 states that sexual harassment is unlawful and defines it as unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Examples of sexual harassment may include the following, although this is not an exhaustive list:

- flirting, gesturing or making sexual remarks about someone's body, clothing or appearance;
- displaying or sharing sexual images;
- asking questions about someone's sex life;
- telling sexually offensive jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment;

- displaying or sharing pornographic or sexual images, or other sexual content;
- touching someone against their will, for example hugging them;
- sexual violence, including unwanted sex acts, rape, threatening to carry out sexual violence.

Joking or banter can be considered sexual harassment if:

- the behaviour is of a sexual nature;
- it is unwanted;
- it violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them.

Sexual harassment can be one isolated incident or several incidents.

Certain behaviours should be considered as sexual harassment, and therefore unlawful, even if the perpetrator did not intend their conduct to be offensive. An action can constitute sexual harassment even if the perpetrator did not intend to create an offensive, humiliating environment for the individual.

The conduct need not be sexually motivated, only sexual in nature.

An individual can experience sexual harassment from someone of the same or different sex.

Sexual harassment may be obvious, or it may be subtle and more difficult to recognise. It can take place at any level and within any workplace relationship and can also be carried out by third parties such as visitors, contractors, members of the school community i.e. parents/carers/pupils/governors/trustees.

Sexual harassment is not limited to working hours and working premises. In fact, episodes of sexual harassment can occur in any work situation, including social events, outside of the workplace, home visits, on social media or any online communication platform (e.g. emails, video conference calls, phone calls or instant messaging platforms).

Sexual interaction that is invited, mutual or consensual is not sexual harassment because it is not unwanted. However, sexual conduct that has been welcomed in the past can become unwanted.

3.3 Third party sexual harassment

In line with its legal duties, the Trust and all of its schools are committed to taking reasonable steps to prevent sexual harassment of staff by third parties which is not tolerated. Third parties are people who do not work for and are not an agent of the School/Trust (for example visitors, contractors, members of the school community i.e. parents/carers/pupils/governors/trustees).

In accordance with the statutory guidance Keeping Children Safe in Education, the School/Trust recognises that pupil-on-pupil sexual harassment may also impact staff and other adults working in the school. Where such behaviour occurs, the school will take prompt and appropriate action to safeguard the wellbeing of staff, in addition to fulfilling its safeguarding responsibilities to the pupils involved. This includes investigating concerns

thoroughly, taking corrective action where appropriate, and ensuring that both staff and pupils are supported.

Workers are encouraged to report sexual harassment by third parties by immediately informing the Head teacher and/or CEO.

Although an individual cannot bring a claim for third party sexual harassment alone, it can still result in legal liability when raised in other types of claims.

Examples of steps the Trust will take to prevent third party sexual harassment includes but is not limited to:

- Encouraging colleagues to speak up on matters in relation to sexual harassment
- To regularly review School's/Trust risk assessments

3.4 Bullying

Bullying in the workplace may be characterised as:

- Offensive, intimidating, malicious or insulting behaviour involving an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Bullying can take the form of physical, verbal and non-verbal conduct.

Harassment is when bullying or unwanted behaviour is about any of the protected characteristics defined in the Equality Act 2010 (as defined in section 3.1).

3.5 Victimisation

Victimisation is defined in the Equality Act 2010 as:

- Subjecting an individual to a detriment because he/she does a protected act, or it is believed he/she has done or may do a protected act.

A 'protected act' is:

- Bringing proceedings under the Equality Act 2010 or any relevant enactment;
- Giving evidence or information in connection with proceedings under the Act or any other relevant enactment;
- Doing any other thing for the purposes of or in connection with the Act or any other relevant enactment;
- Making an allegation that someone has breached the Act or any other relevant enactment.

4. Examples of unacceptable behaviour

Unacceptable behaviour in this Trust includes:

- Insulting someone verbally or through offensive behaviour
- Physical or psychological threats
- Spreading malicious rumours
- Sharing information about an individual with others who do not need to know
- Ridiculing or demeaning someone
- Picking on someone or setting them up to fail
- Exclusion
- Misuse of power, such as overbearing supervision or deliberately undermining a competent worker
- Unwelcome sexual advances, such as touching, standing too close, displaying offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected, making sexual innuendo
- Making unfounded threats or comments about job security
- Preventing an individual from progressing by intentionally blocking promotion or training opportunities
- Putting humiliating, offensive or threatening comments or photos on social media

This list is not intended to be exhaustive and any behaviour which is found to breach the definitions set out in clause three are capable of amounting to unacceptable behaviour.

Harassment (including sexual harassment), bullying or victimisation may occur:

- Face to face
- Through written communication
- Using visual images (for example, pictures of a sexual nature or embarrassing photographs of colleagues)
- Via email
- Via phone or communication platforms
- Via social media
- Via automatic supervision methods, such as computer recording of downtime from work, or recording of telephone conversations, if these are not universally applied to all workers in similar roles

This list is not intended to be exhaustive and any behaviour which is found to breach the definitions set out in clause three are capable of amounting to unacceptable behaviour.

5. Reasonable management

The Trust differentiates between reasonable management, which is firm and fair, and behaviours associated with harassment, bullying or victimisation.

Legitimate, justifiable, appropriately conducted monitoring of a member of the Trust's workforce's behaviour or job performance does not therefore constitute bullying, harassment or victimisation.

6. Roles and responsibilities

6.1 The Board of Trustees

The governing board:

- Ensures complaints and allegations are handled according to agreed procedures
- Holds the head teacher to account for the implementation of this policy
- Ensures that this policy is periodically reviewed and kept up to date
- Deals with complaints raised by or about the head teacher

6.2 The Head teacher (CEO for central team)

The head teacher:

- Works to ensure that the working environment is free from harassment, bullying and victimisation
- Works to check that complaints and allegations are handled according to agreed procedures
- Works to ensure that the harassment risk assessment process is carried out and reviewed regularly either directly or by delegating this function to another member of staff
- Works to ensure that appropriate training on harassment, the monitoring and evaluation of actions taken in response to complaints of harassment is undertaken and monitored appropriately either directly or by delegating this function to another member of staff

6.3 All members of the Trust's workforce

All members of the Trust's workforce should:

- Treat colleagues with dignity and respect
- Contribute to maintaining an environment free from harassment, bullying and victimisation
- Support colleagues who experience unacceptable behaviour and who are considering making a complaint, or have made a complaint
- Report any occurrence of unacceptable behaviour and offer supporting evidence in any investigation where appropriate

6.4 Line managers

Line managers, and those fulfilling this role when a complaint is about the line manager:

- Will listen to and take seriously any member of the Trust's workforce who comes to them with a concern or complaint regarding harassment, bullying or victimisation

7. What to do if you're being harassed, bullied or victimised

If you are being harassed (including sexual), bullied or victimised by an employee (as defined in 8.1, below), stakeholder (as defined in 8.2, below) or pupil, speak to a Senior Leader in a school or Director within the Trust. They can provide confidential advice and assistance in resolving the issue.

If the subject of your complaint is a Senior Leaders speak to Head teacher or the CEO if relates to the Head teacher.

In the case of members of the LAB, 'line manager' in this policy means the chair of the governing board (LAB). If the LAB chair is the subject of your complaint, speak to the Chair of Trustees.

Consider whether you feel able to raise the issue informally with the person responsible. Your Head teacher, if your complaint is about your line manager or chair of the governing board (LAB) can support you with this.

If you do raise the issue with the individual, you should explain clearly that their behaviour is not welcome or makes you uncomfortable. It may be that they are not aware of the effect of their actions.

Raising the matter informally will involve a discussion of the events, with the intention of reaching an agreement that the behaviour will cease with immediate effect.

If you feel uncomfortable raising the matter with the individual informally, or you have tried to do so without a successful resolution, the school/Trust will decide whether your complaint should be dealt with formally under this policy or under the Trust's work resolution (grievance) procedures. It is for the school/Trust to determine the appropriate procedure, based on the facts of the case.

If the complaint is dealt with under this Dignity at Work policy, the school/Trust will follow the procedure set out below A, B & C).

If the complaint is dealt with under the Trust's work place resolution (grievance) procedures, you should refer to those.

8. Formal procedure for managing complaints

How complaints will be dealt with will depend, in part, on whether the alleged perpetrator is an employee, a stakeholder or a pupil. Each option, and who it relates to, is set in the Appendix A, B & C. For all allegations of members of the Trust's workforce being harassed, bullied or victimised, consideration will be given to involving other agencies as necessary.

Where a complaint has been raised and is being investigated under this procedure, the Trust's will consider requests from the complainant to change their working arrangements, duties or hours in order to avoid or minimise contact with the alleged perpetrator until a successful resolution and an agreed outcome are reached.

8.1 Alleged harassment (including sexual harassment), bullying or victimisation by employees

The Trust's will use this process if the complaint relates to someone employed directly by the Trust's, or where the Trust's has the power to take professional or disciplinary action.

8.1.1 Submitting a formal complaint

Where the decision has been reached for the complaint to be dealt with under this dignity at work policy, please see Appendix in making a formal complaint and sent to the Head teacher in writing to their line manager. If the complaint relates to their Head teacher, it should be sent to the CEO. In the case of central staff this should be sent to the Executive Director of Schools.

The written complaint should set out the nature of the complaint with reference to specific incidents where possible, including times, dates and witnesses. It is important that it contains sufficient detail to enable the nature of the complaint to be determined.

8.1.2 Formal investigation

Once a written complaint is received, this matter will be considered will be considered by Head teacher/CEO/EDoS to consider immediate next steps by gathering any evidence that is available at that time. Please see process in Appendix A, B & C below which confirms the process to be followed in dealing with the complaint raised

8.1.3 Action following the investigation

If the investigating officer upholds the complaint against the employee, possible outcomes may be:

- Disciplinary action following the Disciplinary Policy
- Mediation – Workforce Resolution Policy if appropriate
- Mandatory training

If the investigating officer does not uphold the complaint, possible outcomes may be:

- No action
- Mediation

These lists are not intended to be exhaustive.

8.2 Alleged harassment, bullying or victimisation by stakeholders

The school/Trust will use this process if the complaint relates to someone not employed directly by the Trust, or when the school/Trust doesn't have the power to take any professional or disciplinary action against the person in question.

Where the decision has been reached for the complaint to be dealt with under this Dignity at Work policy, the matter will be handled in line with the above outlined formal procedure – namely the requirement for a formal written complaint to be submitted and a formal investigation to commence. It may be appropriate to allow the stakeholder to be accompanied as part of any investigation interview.

If the allegation is found to be justified, the response from the school/Trust will depend on the relationship of the perpetrator to the school/Trust and the nature and severity of the incident.

The school/Trust will take proportionate action in consultation with the individual who made the complaint. This may involve:

- Mediation
- Putting up signs setting out acceptable and unacceptable behaviour
- A verbal warning
- A written warning

This list is not intended to be exhaustive.

If the action taken is not effective in preventing issues, or for very severe cases, the school/Trust will consider further action. This may involve a meeting to discuss a ban from one, or more than one, of the Trust's sites. If the perpetrator is a contractor, this may involve a meeting to discuss the termination of the contract between them and the school/Trust.

In the case of a ban, the individual will be informed in writing that they are banned from the premises, subject to review. At this stage, other agencies such as the local authority may be involved. Where appropriate, the school/Trust will have regard to the Department for Education's guidance on controlling access to Trust's premises (see section 2 of this policy).

If the individual is a parent of a pupil at a Trust school, where appropriate, the arrangements for pupils being delivered to and collected from the school will be clarified.

8.3 Alleged harassment (including sexual harassment), bullying or victimisation by pupils

Where the decision has been reached for the complaint to be dealt with under this Dignity at Work policy, the matter will be handled in line with the above outlined formal procedure – namely the requirement for a formal written complaint to be submitted and a formal investigation to commence. It may be appropriate to allow the pupil to be accompanied by an appropriate adult as part of any investigation interview.

If the allegation is found to be justified, the school will then refer to the behaviour policy, and may issue a disciplinary sanction against the pupil in accordance with that policy (up to and including permanent exclusion where appropriate), with reference to the safeguarding policy if appropriate to the pupil's circumstances.

Where the pupil remains at the school, the school will also take responsibility for educating the pupil about appropriate behaviour and will liaise with the individual who raised the allegation about alternative working arrangements (temporary or permanent) if they teach, or otherwise have regular interaction with, the pupil.

8.4 Continued working relationships

If it is decided that there is no case to answer, support will be provided for both parties and consideration given to managing their ongoing working relationship.

We will also consider whether there is evidence that the complaint has been malicious. If there is evidence to suggest that the complaint was malicious, this will be investigated and dealt with under our disciplinary procedures. Where the individual isn't covered by our disciplinary procedures, the school/Trust will consider other reasonable action, and involve other agencies where appropriate.

Whatever the outcome, we will consider how to support the individuals involved to maintain an ongoing working relationship.

8.5 Appeals

If the complainant is not satisfied, they should write to the Chair of Board of Trustees within 10 working days of being informed of the outcome of the procedure.

An appeal hearing will then be arranged within a reasonable period of time and will be dealt with by an appropriate level of senior management with no prior involvement with the complaint and/or investigations. The complainant may be accompanied at the hearing by either a colleague, a trade union official, a trade union representative who has been certified by their union as competent to accompany a worker.

The appeal outcome will be confirmed in writing within 5 working days of the hearing.

An outcome may dismiss the appeal and confirm the original decision or may uphold the appeal and overturn the original decision.

9. Confidentiality

The school/Trust will respect confidentiality for both the person making the allegation and the subject of it. Details of the investigation and the names of the victim and alleged perpetrator will only be disclosed when necessary (for example, when it is necessary to give details to properly investigate the matters raised).

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

A complaint about a pupil may be stored on their educational record.

Information will be processed in line with UK data protection law. It will be kept securely, only for as long as necessary and in line with UK data protection law, our privacy notices and record retention schedule.

10. Further information

An employee can seek further information on harassment (including sexual harassment), bullying and victimisation from their:

- Line manager
- Trade union representative
- HR department

11. Monitoring arrangements

This policy will be reviewed by the CEO annually.

12. Links to other policies

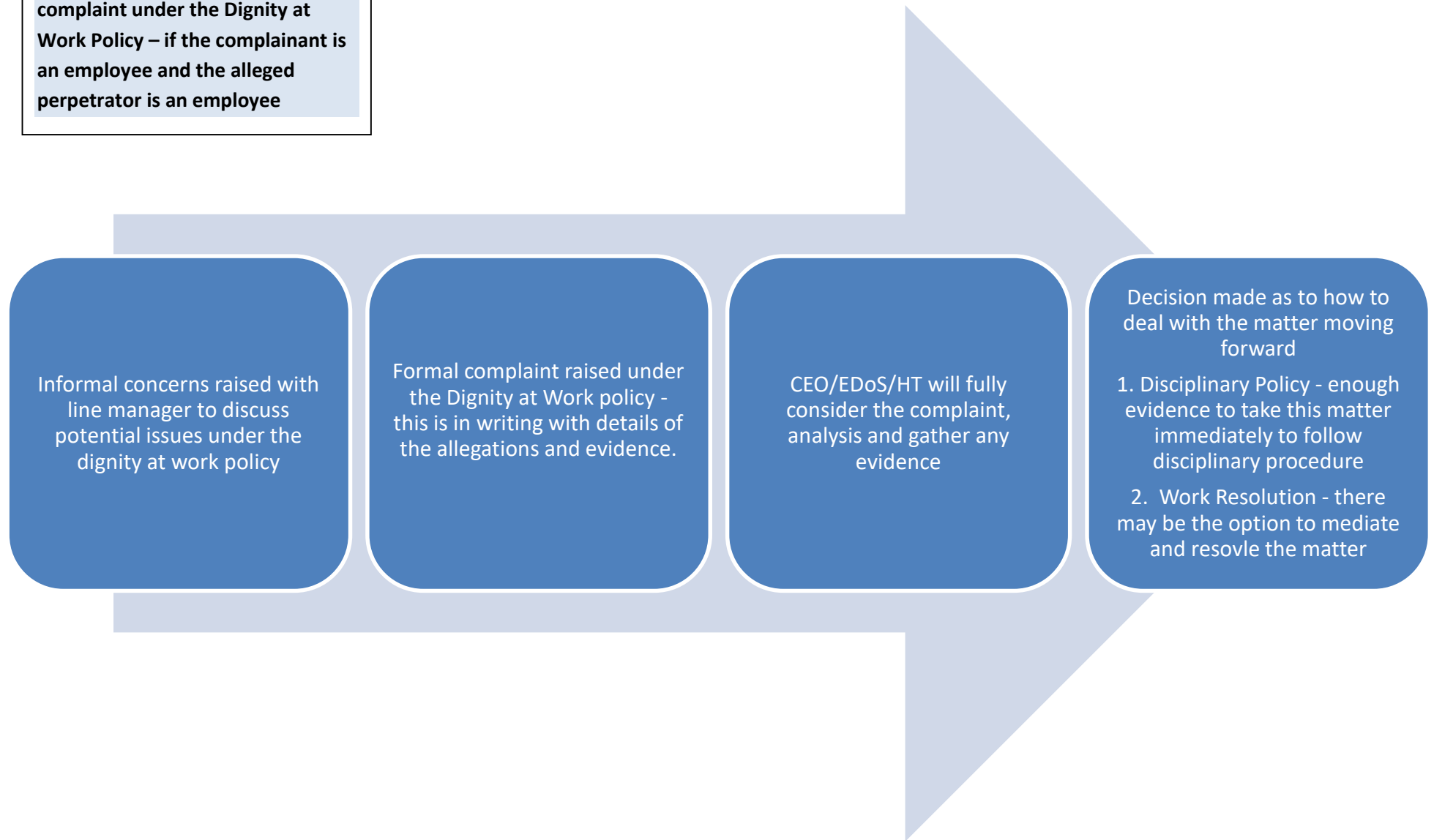
This policy is linked to the following policies:

- Workplace Resolution Policy
- Staff disciplinary procedures
- Whistle-blowing policy
- Staff code of conduct
- Behaviour policy
- Safeguarding policy
- Staff wellbeing policy

13. Actions that all schools/the Trust will undertake to ensure staff are aware of this policy and their role in supporting this:

- Share this policy with all staff annually and give opportunities for questions/discussion. RPT schools and the Trust have an open door policy to raise any concerns at any time.
- Share this policy with all staff during their induction period and give opportunities for questions/discussion
- Discuss at annual appraisal – are there any potential issues arising and how is this being addressed.
- Display this policy in the entrance area at each Trust school
- Display this policy in the staff room at each Trust school
- Display posters across the Trust schools to remind all staff of the key messages relating to this policy
- ***The Trust operates an alcohol and illegal drug free environment at all times*** – there should be no alcohol or illegal drugs bought and consumed on to the Trust's premises. Bringing alcohol or illegal drugs onto any Trust site will result in disciplinary action that could result in dismissal.

Appendix A - Employee complaint under the Dignity at Work Policy – if the complainant is an employee and the alleged perpetrator is an employee



Appendix B

Employee complaint under the Dignity at Work Policy – if the complainant is an employee and the alleged perpetrator is a 3rd party

Informal concerns raised with line manager to discuss potential issues under the dignity at work policy

Formal complaint raised under the Dignity at Work policy - this is in writing with details of the allegations and evidence sent to HT and/or CEO

CEO/EDoS/HT will fully consider the complaint, analysis and gather any evidence

If this matter is related to a 3rd party then this matter will be handled via the complaints policy and escalated to 3rd party ie agency if there is a serious breach

Appendix C

Employee complaint under the Dignity at Work Policy – if the complainant is an employee and the alleged perpetrator is a pupil

Informal concerns raised with line manager to discuss potential issues under the dignity at work policy

Formal complaint raised under the Dignity at Work policy - this is in writing with details of the allegations and evidence.

This matter is immediately escalated to HT/CEO and fully consider the complaint, analysis and gather any evidence

This matter will be discussed with Executive Director of Schools who may involve Safeguarding Lead and/or Inclusion Team and managed via safeguarding procedures