



A collaboration of schools which enhances the educational experiences and outcomes for children, maximising the benefits of working together, whilst maintaining the individual culture and ethos of each individual school

Anti-bullying and Anti-harassment Policy & Procedures

Author:	Lead Governance Professional
Approver:	People & Pay Committee
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Category of policy:	Trust Board

Changes history

Version:	Date:	Amended by:	Substantive changes:	Purpose:
1			New trust policy	
2	February 2026	Lead Governance Professional	Add a section on whistleblowing for reports of sexual harassment and add Shinfield St. Mary's contact details	To reflect Employment Rights Act 2025 and to reflect the new school in the trust

1. Purpose

This policy outlines the Trust and schools' commitment to fostering a diverse, equitable, and inclusive workplace, free from any form of harassment, bullying and victimisation. It specifies the preventive measures in place, the procedures for handling complaints, and the support available for those affected. All employees are expected to be aware of their rights, responsibilities, and their role in maintaining this policy.

1. Scope

This policy applies to everyone working for the Agape Multi Academy Trust (the Trust) and is relevant to all stages of the employment relationship. This includes:

- Employees
- Agency workers
- Trainees
- Consultants
- Workers
- Apprentices
- Volunteers, including governors and trustees
- Job seekers and job applicants

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

The policy also applies to harassment by third parties.

Any reference to staff below means any of the persons detailed above.

2. Introduction

The Trust and schools within the trust are committed to providing a working environment where all staff are treated with dignity, respect, and courtesy. Every member of staff has the right to work without experiencing any form of harassment, discrimination, or victimisation based on the Equality Act 2010 protected characteristics, including age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy, or maternity.

The Trust and the schools within the trust recognise that individuals who experience harassment, discrimination, bullying, or victimisation may feel vulnerable and powerless. A toxic workplace culture that tolerates such behaviours can significantly harm staff wellbeing and negatively impact the Trust and the School's work. As such, the Trust and our schools enforce a zero-tolerance approach to instances of bullying, victimisation and harassment, including sexual harassment. Bullying and harassment by third parties will also not be tolerated.

Complaints about breaches to this policy will be treated seriously and the Trust and/or its schools will use their disciplinary procedures or take other appropriate action, according to the nature of the complaint.

This policy should not be seen to be in conflict with managers' and Headteachers' rights and responsibilities to oversee their staff and address poor or inadequate performance, while ensuring adherence to the Trust and School's established procedures, such as those for capability, performance management, and disciplinary actions, in a manner that maintains trust.

3. Responsibilities and Measures

The Trust and our schools are committed to actively prevent all forms of harassment, including sexual harassment via some key measures including:

- ensuring all current staff & workers have attended or completed sexual harassment training
- ensuring new starters successfully complete Sexual Harassment Awareness training, as part of their induction programme
- providing additional training for managers and Headteachers to ensure that they understand their role in preventing and stopping bullying and harassment from occurring in the workplace in line with this policy
- monitoring the workplace culture through anonymous surveys, exit interviews and one-to-one conversations to identify and address any issues
- undertake regular risk assessments to determine reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace
- ensuring that our zero-tolerance approach to all forms of discrimination and harassment, as well as the procedure to be followed to report and address concerns are communicated to all staff
- encouraging members of staff who experience all types of harassment, including sexual harassment by a third party such as students, parents, and other visitors to report it.
- notifying third parties and visitors to the school that harassment of our staff is unlawful and will not be tolerated.
- conducting assemblies on bullying and harassment for students.
- includes reference in our communication policy to our policy on harassment and requiring that both the parents and the students adhere to it.
- Ensuring staff are aware of our whistleblowing policy and have access to it

Everyone working or visiting the Trust/Schools are expected to adhere to this policy and take personal responsibility for fostering an inclusive culture free from harassment, discrimination, victimisation, or bullying. This includes speaking up or reporting any such behaviour, whether it is caused by colleagues or third parties such as students, parents, and other visitors. Staff should be aware that they may be held personally liable for their acts of harassment.

Managers and Headteachers are expected to recognise their leadership role in modelling acceptable behaviour and creating an inclusive environment so that any incidents of harassment are robustly challenged and addressed. They are responsible for consistently enforcing this policy, acting promptly on unacceptable behaviour, and ensuring all complaints are taken

seriously, handled fairly, and with sensitivity to the individual. Managers and Headteachers should ensure that staff who report harassment, or support others to do so, are not treated less favourably than others because of this.

4. Principles and Procedures

4.1 Definition of Harassment

Harassment includes any verbal or physical abuse, unwanted behaviour, or advances. Harassment may be behaviour an individual finds offensive and which causes them to feel humiliated, threatened, distressed or patronised. This action may also be considered harassment if it adversely affects an individual's job performance or creates an intimidating work environment.

Harassment may be deliberate or unconscious, repeated action or an isolated incident. Such behaviour can constitute harassment even if the perpetrator does not intend it as such.

Harassment can take place at school, during workplace events, outside of work (including site visits and meetings), outside of normal working hours, and through online communications (e.g., emails, video calls, social media).

Harassment is unlawful under the Equality Act 2010. All types of harassment, as described in the sections below, are unethical, can constitute to unlawful discrimination, and go against the Trust's commitment to treating everyone with dignity and respect. Therefore, incidents of harassment will be treated seriously and may result in disciplinary action up to and including dismissal under the Trust's disciplinary process. Staff who experience harassment by a third party are also encouraged to promptly report it.

5.2 Sexual Harassment

Sexual harassment involves unwelcome sexual or sex-based behaviour that undermines the dignity of individuals at work. It encompasses a wide range of behaviours, including but not limited to:

- Sexual gestures
- Intrusive questions about personal or sexual matters
- Spreading sexual rumours
- Unwelcome sexual advances or demands for sexual favours
- Unnecessary touching, patting, pinching, or hugging
- Displaying or circulating pornography
- Suggestive looks, staring, or leering
- Deterioration of working conditions following refusal of sexual advances
- Isolation, non-cooperation, or exclusion from workplace activities
- Invasion of personal space
- Verbal and written harassment, including offensive jokes, language, and sexually explicit communications
- Visual displays of sexually explicit material
- Gender-based comments about work performance

Sexual harassment is unlawful and the Trust and schools have a legal duty to take reasonable steps to prevent it. All reports will be taken seriously and handled in accordance with the Trust's disciplinary procedures.

Key considerations:

- i. Third party reporting: The preventative duty includes prevention of sexual harassment by third parties. While an individual cannot bring a claim for third-party harassment alone, it can still result in legal liability when raised in other types of claims. The Trust and our schools do not tolerate sexual harassment by any third party and encourage staff to report such incidents.
- ii. Other protected characteristics: Sexual harassment can intersect with other protected characteristics under the Equality Act 2010. An individual can be sexually harassed and also experience unlawful harassment related to one or more of the protected characteristics.
- iii. Power Imbalances: Sexual harassment can reflect power dynamics, frequently arising from imbalances in gender or status. It often takes place in unequal relationships, such as between supervisors and employees, and these power disparities will be taken into account during disciplinary actions.
- iv. False Allegations: Deliberate false or malicious accusations of sexual harassment may lead to disciplinary action. Individuals will not face disciplinary measures solely based on unsubstantiated complaints. Disciplinary action will only occur if an allegation is proven false and made in bad faith.

Whistleblowing and sexual harassment

From 6th April 2026 workers who act in the public interest and who reasonably believe that sexual harassment has occurred, is occurring or is likely to occur will be protected from being dismissed or subjected to a detriment because they have made this protected disclosure. Please refer to our whistleblowing policy for more information.

5.3 Racial Harassment

Racial harassment can be defined as unwanted conduct of a discriminatory nature where a person is treated less favourably than another based on racial group, colour, ethnicity or culture which is offensive to the dignity of the recipient. This can include physical, verbal and nonverbal conduct.

Racial harassment may constitute race discrimination. The Trust may be liable for what their employees do, whether or not the Trust and the school knows about those actions. Whilst much of what has been previously stated about sexual harassment applies, there is an additional offence of inducing or instructing another to discriminate. Racial Harassment can include the following:

- Racist language or abuse directed towards or in the hearing of any member of staff.
- Racist jokes including those made about any group e.g. Irish and Jewish people and those from other racial/ethnic groups

- Racial stereotyping in the workplace which results in employment opportunities not being afforded to that individual.
- An offensive manner in communication which is not used with other employees.
- Isolation, non co-operation at work, or exclusion from workplace talk or activities.
- The judging of an individual's work performance more harshly than any other individual's similar performance by a manager. This would include receiving a more negative performance assessment than his/her counterpart having achieved a similar level of performance.
- Visual display of posters, graffiti, obscene gestures and emblems.

5.4 Harassment of People with a Disability/People with Specific Health Conditions

Harassment of people with a disability can be defined as any behaviour, which discriminates and treats a person less favourably because of a person's disability/health status. The forms of harassment which people with a disability are commonly subjected to are as follows:

- Jokes about a person's disability, including jokes, not only in relation to those who have any form of physical impairment, but those whose disability takes the form of any kind of mental illness.
- Unwanted or patronising comments which draw attention to the individual's impairment.
- Unwanted or patronising comments which draw attention to any employment aids or equipment they may use.
- Stereotyped comments in relation to the capability of a person with a disability.
- Isolation, refusal to assist or non-co-operation at work, exclusion from workplace talk or activities.
- Judging a person with a disability more harshly than a person who has not got a disability where their performance is similar.
- Abuse directed at a person's disability.
- Remarks concerning the sexuality of people with disabilities.

5.5 Harassment on the Grounds of Sexual Orientation or gender re-assignment

Harassment on the grounds of an individual's sexual orientation or gender re-assignment status may result in offence being caused to the dignity of the recipient. Harassment on the grounds of sexual orientation or gender re-assignment may take the form of:

- Jokes aimed at an individual's sexual orientation or gender re-assignment status.
- Innuendoes and teasing by colleagues because of their sexual orientation or gender re-assignment status.
- Unwanted jokes and comments implying that the lesbian or gay member of staff should find a partner of the opposite sex.
- Threatening to publicise or actually publishing the fact that a colleague is lesbian or gay.
- An individual's sexual orientation or gender re-assignment status being brought to the attention of other staff.
- Exclusion from workplace talk or activities.
- Isolation or non-co-operation at work

It needs to be recognised that because of discrimination on the grounds of sexual orientation or

gender re-assignment status, incidents of harassment, especially sexual harassment for example, may be unreported by the victim because of their fear of their sexuality or gender re-assignment status being identified.

5.6 Harassment of Individuals on Religious Grounds

Harassment of individuals on the grounds of religious beliefs constitutes unacceptable behaviour and as such will not be tolerated by the Trust and our schools. Harassment of staff on the grounds of religion may take the form of:

- References made to religious beliefs in a derogatory manner.
- Religious beliefs being brought to the attention of other staff.
- Innuendoes and teasing by colleagues on the basis of religious beliefs

5.7 Bullying

Bullying is generally seen as behaviour that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power. It is typically repetitive and has the impact of undermining, humiliating, or harming the individual on the receiving end. It includes actions, comments, physical contact or behaviour, which is found to be objectionable by the recipient. Bullying may take the form of consistent, continual or persistent:

- Personal abuse either in public or private.
- Use of abusive language.
- Unjustified criticism.
- Ignoring or excluding an individual.
- Setting of targets with impossible to meet deadlines

Bullying is complex and often difficult to describe by those affected and it is under-reported because of the perception that it is trivial or because of embarrassment, which the recipients of bullying may feel.

If the bullying relates to a person's protected characteristic, it may constitute harassment and, therefore, will be unlawful.

It is recognised that there may be one off incidents of poor behaviour, e.g. a loss of temper, which may not constitute bullying, but which may not be regarded as acceptable behaviour in a work environment. Such cases will be dealt with as appropriate, including the use of the disciplinary procedure. In addition, bullying by third parties will not be tolerated and staff are encouraged to promptly report such cases.

5.8 Age Harassment

Age Harassment is based on unjustified assumptions about a person's value and abilities because of their age. Harassment can include:

- Ageist jokes or comments.
- Physical threats or abuse.
- Stereotyping about commitment to a job i.e. he won't be interested in a training course, s/he has only got two years to go until they retire.

- Suggestions that older staff have outdated ideas and do not cope well with change.

5.9 Pregnancy and Maternity

Harassment in this context can be defined as any behaviour, which discriminates and treats a person less favourably as a result of their pregnancy or maternity leave. Harassment can include:

- Unwanted or patronising comments
- Stereotyped comments in relation to ability or commitment
- Judging an individual's work performance more harshly than other individuals whose performance is similar

5.10 Marriage and civil partnership

Harassment in this context can be defined as any behaviour, which discriminates and treats a person less favourably as a result of their marriage or civil partnership status.

5.11 Victimisation

Victimisation occurs when an employee is treated badly because they have engaged or are going to engage in a protected act, such as reporting a claim of harassment, including sexual harassment. Protected acts include:

- Making a claim or complaint under the Equality Act 2010 (e.g., for discrimination or harassment)
- Assisting someone else in making a claim by providing evidence or information
- Alleging a breach of the Act
- Taking any other action related to the Act

The protection applies to anyone making a claim, or assisting others, regardless of whether a breach occurred, as long as they genuinely believe their information is true and is not made in bad faith.

Treating an individual badly includes, but is not limited to adverse employer actions, such as demotion, dismissal, or unfavourable changes in job duties or working conditions.

Under the Equality Act 2010 victimisation is unlawful and any such incidents will be treated with the utmost seriousness and addressed promptly through the School's disciplinary process.

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

If you are being harassed, bullied or victimised by an individual in the Trust, stakeholder or pupil, speak to your line manager within the school. They can provide confidential advice and assistance in resolving the issue.

Staff are advised to keep written records of any incidents.

If your line manager is the subject of your complaint, speak to your Line Manager's Manager or a member of the Senior Leadership Team.

Staff may also wish to discuss their case, where they are a Trade Union member, with their Trade Union representative.

In the case of staff working in the Trust Central Team, 'line manager' in this policy means the CEO. If the CEO is the subject of your complaint, speak to the Chair of the Trust Board.

In the case of members of the Local Governing Committee, 'line manager' in this policy means the chair of the Local Governing Committee. If the chair is the subject of your complaint, speak to the Headteacher or the Chair of Trustees.

In the case of members of the Trust Board, 'line manager' in this policy means the Chair of the Trust Board. If the Chair is the subject of your complaint, speak to the CEO.

For job applicants, job seekers and former members of the school workforce, 'line manager' in this policy means the Headteacher.

6.1 Informal procedure

Consider whether you feel able to raise the issue informally with the person responsible. Your line manager or the persons detailed above 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 Trust/school will decide whether your complaint should be dealt with formally under this policy or under the school's grievance procedures. It is for the trust/school to determine the appropriate procedure, based on the facts of the case.

If the complaint is dealt with under this policy, the school will follow the procedure set out below.

If the complaint is dealt with under the Trust's grievance procedures, you should refer to those.

6.2 Formal procedure

How complaints will be dealt with will depend, in part, on whether the alleged perpetrator is an employee, member of staff, a stakeholder or a pupil. Each option, and who it relates to, is set out below.

For all allegations of members of the school 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 school 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.

6.3 Alleged harassment, bullying or victimisation by employees

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

6.3.1 Submitting a formal complaint

Where the decision has been reached for the complaint to be dealt with under this policy, the complainant should submit their complaint in writing to their line manager. If the complaint relates to their line manager, it should be sent to the Line Manager's Manager. Please see section 6 above if you are a member of the trust team, a governor or a trustee as to whom your line manager is.

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.

6.3.2 Formal investigation

Once a written complaint is received, an investigating officer will be appointed to carry out an investigation into the complaint. This will be an independent individual with no prior knowledge of the complaint.

Both the complainant and the subject of the complaint should be advised that a formal complaint has been made and that an investigation will take place.

An interview will usually be arranged with the complainant within 1 week of receipt of the complaint. The subject of the complaint will then be interviewed and will be allowed the opportunity to respond to the complaint. There is no entitlement for the subject of the complaint to see the written complaint, but they should be provided with information as to the nature of it.

Both the complainant and the subject of the complaint may be accompanied at any stage of the formal procedure 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, or a friend.

If any other witnesses are deemed pertinent to the investigation, the investigating officer will arrange to speak with them and will review relevant information and documentation.

The investigating officer will consider all information and evidence gathered over the course of their investigation and will produce a written report detailing their findings and recommendations about action to be taken upon the conclusion of the investigation.

The Headteacher (or the CEO if the Headteacher has been previously involved in the matter) will decide upon the action to be taken.

For members of the Central Trust Team a senior member of staff will be appointed as the Investigating Officer and the CEO will decide upon the action to be taken. If the CEO has previously been involved the Chair of the Trust Board or their appointed representative will decide upon the action to be taken.

For governors and trustees the Headteacher, CEO or another governor/trustee will be the Investigating Officer with the Chair of either the Local Governing Committee or Trust Board deciding upon the action to be taken, as appropriate.

6.3.3 Action following the investigation

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

- Disciplinary action
- Mediation
- 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.

6.4 Alleged harassment, bullying or victimisation by stakeholders

The Trust will use this process if the complaint relates to someone not employed directly by the trust, or when the 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 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 Trust/school will depend on the relationship of the perpetrator to the trust/school and the nature and severity of the incident.

The Trust/school 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 Trust/school will consider further action. This may involve a meeting to discuss a ban from the Trust/school site. If the perpetrator is a contractor, this may involve a meeting to discuss the termination of the contract between them and the Trust/school.

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 Trust/school will have regard to the Department for Education's guidance on controlling access to school premises.

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

6.5 Alleged harassment, bullying or victimisation by pupils

Where the decision has been reached for the complaint to be dealt with under this 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 Trust/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.

7. 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, we 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. Appeals

If the complainant is not satisfied, they should write to the Governance Professional of the school/ Trust as appropriate within 10 working days of being informed of the outcome of the procedure.

For staff at Altwood school please contact Mrs Jo Hargreaves jhargreaves@altwood.co.uk

For staff at Piggott School please contact Mrs Rebecca Marr MarrR@piggottschool.org

For staff at Shinfield St. Mary's Junior School please contact clerk@shinfield-st-marys.wokingham.sch.uk

For staff of the Central Trust Team, governors and trustees please contact Mrs Rebecca Marr MarrR@agapetrust.co.uk

An appeal hearing will then be arranged within a reasonable period of time and will be dealt with by a panel of three governors and/or trustees with no prior involvement or knowledge of the matter.

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, or a friend.

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.

A meeting of the Appeals Panel is the last stage in this procedure and therefore the decision of the panel will be final.

9. Data Protection

The Trust and our schools take their obligation regarding compliance with the UK Data Protection Act 2018 (DPA 2018) very seriously. Employees should report any unauthorised access or disclosure of personal data immediately, as this may be considered a data protection breach and will need to be investigated by the data protection officer (DPO). Where a complaint is made, any processing of personal data must be done in accordance with the Trust's and the School's data protection policy and in compliance with the UK data protection legislation.

10. Associated policies

- Disciplinary Policy & Procedure
- Equality Policy
- Grievance Policy
- Data Protection Policy
- Safer Recruitment
- Staff code of conduct
- Child Protection & Safeguarding
- Whistleblowing