

BULLYING AND HARASSMENT POLICY

1) Introduction

- a) We believe that all stakeholders have the right to study, work and live in an environment that is safe and free from bullying and harassment.
- b) This policy aims to achieve a safe, healthy and fair learning environment where every learner can make the most of their learning experience.
- c) This policy should be read alongside ETT's separate Safeguarding Policy, which outlines child protection procedures, the role of the Designated Safeguarding Lead (DSL), and processes for managing safeguarding concerns including peer-on-peer abuse that meets the threshold of significant harm.

2) Purpose

- a) Fostering an environment where bullying and harassment are clearly unacceptable, thereby reducing the likelihood of such behaviour occurring.
- b) Deterring bullying or harassing behaviour, detecting it when it occurs, and dealing with it on a case-by-case basis, taking necessary action where required.
- c) Encouraging the reporting of bullying or harassing behaviour at all levels.
- d) Setting out strategies and mechanisms to respond to allegations of bullying and harassment and to resolve complaints.
- e) Complying with duties under the Equality Act 2010.
- f) Complying with statutory safeguarding expectations under Keeping Children Safe in Education (KCSIE) September 2025

3) Scope of the Policy

- a) This policy applies to any person enrolled on a programme with ETT, and all staff, regardless of age, gender, nationality, or other personal circumstances.
- b) These provisions apply at all times on ETT premises without exception. They also apply in learner workplaces where ETT staff are operating, and, where appropriate, in situations where learners and/or staff are not directly engaged in ETT activities. This includes, but is not limited to, online behaviour, off-site activities, and any interactions arising from relationships formed through involvement with ETT.
- c) This policy relates to bullying and harassment perpetrated by or against (non-exhaustive list):
 - i) Learners
 - ii) Trainers, Training Officers and other members of ETT staff
 - iii) Visitors to ETT premises
 - iv) Members of the general public

4) Subcontracting

- a) ETT undertakes thorough due diligence on all subcontractors prior to engagement. This includes:

- i) Obtaining and reviewing the subcontractor's own policies and procedures, including their Bullying and Harassment Policy, to ensure alignment with ETT's standards.
- ii) Using ongoing monitoring activities – such as observations of teaching, learning and assessment, and Learner Voice meetings to confirm that there is no evidence of bullying or harassment affecting learners on ETT programmes delivered by subcontractors.
- iii) Where a subcontractor's arrangements are found to be inadequate, ETT will require corrective action and, if necessary, terminate the subcontracting arrangement.

5) Definitions

- a) Learner: Any individual enrolled on a programme at ETT, at any location associated with ETT.
- b) Victim: Any individual who believes they have been subject to bullying or harassment.
- c) Witness/Complainant: Anyone who has witnessed instances of bullying or harassment.
- d) Offender: Any individual accused of conduct that may constitute bullying or harassment as defined in this policy. For this document, the word 'offender' is used both for someone who has an allegation made against them and for some who is confirmed as having bullied or harassed someone. It does not automatically imply guilt.
- e) Bullying defined in line with DfE guidance *Preventing and Tackling Bullying* (July 2017): "Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a learner is adopted or has caring responsibilities. It might be motivated by actual differences or perceived differences". Examples are given in Appendix A.
- f) Harassment as defined in the Equality Act 2010: "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". Examples are given in Appendix A.
- g) Protected Characteristics (Equality Act 2010):
 - i) Age
 - ii) Disability
 - iii) Gender reassignment
 - iv) Marriage and civil partnership
 - v) Pregnancy and maternity
 - vi) Race
 - vii) Religion or belief

- viii) Sex
- ix) Sexual orientation

6) Peer-on-Peer Abuse (Child-on-Child Abuse)

- a) ETT recognises that peer-on-peer abuse (also referred to as child-on-child abuse) is a safeguarding matter, not merely a behavioural issue. This includes, but is not limited to:
 - i) Sexual violence and sexual harassment (as detailed in KCSIE 2025 Part 5)
 - ii) Upskirting
 - iii) Coercive or controlling behaviour
 - iv) Sexting (sharing of nude/semi-nude images)
 - v) Initiation or hazing-type exploitation
 - vi) Bullying that has a significant sexual or violent element
- b) All such incidents will be assessed to determine whether they meet the threshold for a safeguarding referral. Where they do, the matter will be managed under ETT's Safeguarding Policy, and the Designated Safeguarding Lead (DSL) will be informed immediately.
- c) Where the behaviour does not meet the safeguarding threshold, it will be managed under the disciplinary and complaints procedures referenced in this policy.
- d) Learners who report peer-on-peer abuse will be supported without fear of victimisation. ETT will never dismiss sexualised or violent peer behaviour as "banter" or "growing up".

7) General Principles for the Prevention of Bullying and Harassment

- a) ETT will always promote an anti-bullying and anti-harassment culture among its learners.
- b) ETT will never condone or tolerate any form of bullying or harassment under any circumstances, including that perpetrated by visitors or members of the public.
- c) ETT will encourage and support the disclosure and reporting of any bullying or harassment.
- d) Any reported incident will be treated seriously; however trivial it may seem initially. Confidentiality will be guaranteed to victims or complainants, subject to safeguarding duties (where a risk of serious harm exists, confidentiality may need to be breached in line with the Safeguarding Policy).

8) Responsibility of Learners

- a) All ETT learners are expected to:
 - i) Help promote an anti-bullying and anti-harassment culture by adhering to this policy and refraining from bullying or harassing behaviour.
 - ii) Prevent bullying and harassment by being sensitive to the reactions and needs of others.
 - iii) Discourage bullying and harassment by others, making it clear that such conduct is unacceptable, and supporting individuals taking steps to stop it.

- iv) Speak up and report any incidents to a member of staff they trust if they believe they have been subject to, or have witnessed, harassment or bullying.

9) Responding to Bullying or Harassment

- a) We encourage any person who feels they are a victim or witness of bullying or harassment to talk to us early so we can work to stop the negative behaviour against them or others.
- b) When an allegation is raised, ETT will:
 - i) Take it seriously and investigate all incidents thoroughly.
 - ii) Deal with each incident individually and assess the needs of each case separately following either the informal or formal process set out in this document.
 - iii) Take immediate action to prevent escalation or further incidents, which may include:
 - (1) Imposition of sanctions, up to removal from programme
 - (2) Obtaining an apology
 - (3) Informing parents/carers of those involved (if under 18)
 - (4) Informing employers where appropriate
 - (5) Providing advice and support

10) Reporting & Resolving Bullying or Harassment

- a) Informal process
 - i) We encourage the victim or witness (if appropriate) to tell the offender to stop and make it clear that their behaviour is unwelcome. This may be done verbally or in writing. A copy of any written communication should be kept.
 - ii) If the victim or witness feels unable to approach the offender, they should speak to an ETT member of staff who will do so on their behalf.
 - iii) An individual who is made aware that their behaviour is unacceptable should listen to the concerns, respect the other person's point of view, acknowledge the other person's perception, agree on behavioural changes, and apologise if appropriate.
- b) Formal process
 - i) If the informal approach is ignored or inappropriate, the victim or witness should report the bullying or harassment to a member of ETT staff (if not done so already).
 - ii) An ETT staff member accepting a disclosure of bully or harassment will make written notes and report the allegation to the Senior Management Team (SMT) in person and/or via a cause for concern form.
 - iii) If at any point the reported behaviour includes sexual violence, sexual harassment, or any element suggesting significant harm, the staff member receiving the report must immediately refer the matter to the Designated Safeguarding Lead (DSL) without delay, and the matter will proceed under

the Safeguarding Policy rather than solely under this or the Complaints & Grievance Procedure.

- iv) In circumstances where an allegation involves the CEO, a complaint may be raised directly with the ETT Trustees (trustee@theengineeringtrust.org), who will appoint a nominee to progress the matter.
 - v) The SMT or Trustee will investigate in line with the Complaints & Grievance Procedure. All matters will be handled seriously, confidentially and in a sensitive nature so as not to negatively impact the victim or witness.
 - vi) ETT will interview victims, witnesses, or offenders separately.
 - vii) Timescales will be set by the investigator based on the gravity of allegations, number of individuals involved, extent of investigation, and other circumstances. Timescales will be communicated in writing to all parties.
 - viii) In cases of a serious allegation, the offender may be suspended pending further investigation or pending DSL-led safeguarding assessment.
 - ix) If the investigation confirms that bullying or harassment has taken place, the offender will be dealt with under ETT's Disciplinary Procedure. Where the behaviour meets a safeguarding threshold or may be considered to have broken the law, third party agencies will be involved.
 - x) If the investigation reveals that allegations were malicious or vexatious, the matter will be dealt with under ETT's Disciplinary Procedure.
- c) Appeals
- i) Appeals against a disciplinary sanction will follow the appeals process in the Disciplinary Procedure.
 - ii) Appeals regarding the outcome by a victim or witness will follow the appeals process in the Complaints Procedure.
 - iii) If dissatisfied with ETT's response, the victim or witness should put this in writing, and it will be referred to the ETT Trustees for further consideration.

Appendix A – Examples (non-exhaustive)

1) Bullying

- a) Physical: hitting, kicking, pushing, spitting, taking, damaging, or hiding possessions.
- b) Verbal: name-calling, taunting, teasing, mimicking, insulting, demanding money.
- c) Exclusionary: intimidating, isolating, or excluding a person from a group.
- d) General unkindness: spreading rumours, initiation ceremonies, exploitation, writing unkind notes, texts, or emails.
- e) Cyber bullying: using internet, mobile phones, social networking sites, email, digital cameras, web documents, online blogs to deliberately upset someone. ETT will take action to deal with cyber bullying regardless of where it takes place, including where it brings ETT's reputation into disrepute.
- f) Additional forms of bullying:
 - i) Sexual

- ii) Sexist
- iii) Racist or related to religion, belief, or culture
- iv) Related to sexual orientation (homophobic)
- v) Related to pregnancy and maternity
- vi) Related to home or economic circumstances
- vii) Related to disability, special educational needs, learning difficulty, health, or appearance

2) Harassment

- a) Sexist: displaying power over a person because of gender through disparaging remarks or threatening behaviour.
- b) Sexual: unnecessary physical contact, sexual jokes, displaying sexually explicit material, indecent demands, or requests for sexual contact.
- c) On grounds of sexual orientation: homophobic remarks, unwelcome jokes, threats to disclose sexuality, intimate questions about sexual activity.
- d) Racial: inappropriate questioning or jokes about racial/ethnic origin, offensive graffiti, intimidating behaviour including threatening gestures.
- e) Personal: making fun of personal circumstances or appearance.
- f) Age: derogatory age-related remarks, unjustifiable dismissal of suggestions on grounds of age.
- g) Stalking: physical or psychological – repeated or alarming voicemail/email messages, following people home, approaching others for personal information.