


# COMPASS

## Harassment & Bullying Policy



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COMPASS

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Policy Approved by:	Debbie Williams
Signed:	
Approved by the Governing Body:	01.03.2025

Compass promotes an inclusive safe, disciplined and positive environment, culture and ethos, ensuring staff and visitors are treated fairly with respect and recognises the impacts of this on the behaviour and attitudes of students. The company promotes positive behaviour and attitudes and does not tolerate bullying, discrimination, prejudiced behaviour, harassment and / or victimisation and violence in any form including peer on peer abuse, in relationships whether that be online or offline. We are committed to the elimination of bullying and harassment and violent, prejudiced behaviour in any form. It is the right of every individual to study, work and live without fear of harassment or bullying. Our aim is to raise the awareness of bullying and harassment as an issue and in so doing to empower everyone to reduce or eliminate instances of bullying and harassment. Compass will adopt this policy and procedure to ensure that unacceptable behaviours and attitudes are not tolerated and dealt with quickly, consistently and effectively whenever they occur. This policy and procedure apply to all staff employed at Compass and covers any incident that may occur at Compass or in other areas such as workplaces or online.

STATEMENT

Compass is committed to developing and maintaining an antibullying culture where bullying of adults and young people is not tolerated in any form. This policy outlines what the company will do to prevent and tackle all forms of bullying related to staff in the workplace. Bullying, especially if left unaddressed, can have a devastating effect on individuals. It can be a barrier to work and learning and have serious consequences for their mental health. By effectively preventing and tackling bullying, the company can help to create safe disciplined environments where staff are able to work and learn free of harassment.

Links to legislation and guidance:

There are several pieces of legislation which set out measures and action for educational settings in response to bullying as well as criminal and civil law. These may, but not limited to:

- The Education and Inspection Act 2006, 2011
- The Equality Act 2010 and Public Sector Equality Duty 2011
- The Children Act 1989
- Children and Families 2014
- Protection from Harassment Act 1997
- The Malicious Communications Act 1988
- Public Order Act 1986
- The Communications Act 2003
- Keeping Children Safe in Education 2020
- National Minimum Standards
- Education Inspection Framework
- Ofsted 2019

1.0 SCOPE

This document applies to all learners registered or programmes or courses at Compass including those at partner institutions and staff working for Compass.

## 2.0 RESPONSIBILITIES

It is the responsibility of:

- The Apprenticeship Manager to communicate this policy to students to ensure that disciplinary and intervention measures are applied fairly, consistently and reasonably, and that Directors have overall responsibility.
- Governors to take a role in monitoring and reviewing this policy.
- All staff and appropriate partners to support, uphold and implement this policy accordingly.
- Students to abide by this policy.
- Parents and carers to support the student and work in partnership with the College.

## 3.0 KEY TERMS & DEFINITIONS

**Bullying:** 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 direct or indirect forms:

- **Direct** – physical, verbal, non-verbal
- **Indirect** – cyber-bullying, online -bullying, social media, texting, gaming and can also include the use of images and video It can often be motivated by prejudice, real or perceived differences against groups.

This policy and procedure covers all types and forms of bullying:

- Physical bullying and violence or threatening behaviours
- Emotional bullying · Sexual harassment or bullying
- Bullying via technology, known as online or cyberbullying
- Prejudicial bullying (against people/pupils with protected characteristics):
- Bullying related to race, religion, faith and belief and for those without faith
- Bullying related to ethnicity, race, nationality · Bullying related to Special Educational Needs or Disability (SEND)
- Bullying related to sexual orientation (homophobic / bi-phobic bullying)
- Gender based bullying, including transphobic bullying
- Bullying against teenage/ student parents (pregnancy and maternity under the Equality Act)
- Bullying related to physical appearance
- Bullying of young carers, children in care or otherwise related to home circumstances
- Bullying related to physical/mental health conditions
- Initiation or hazing type

Stopping violence and ensuring immediate physical safety is obviously the company's have but emotional bullying can be more damaging than physical; the company will use professional judgements about each specific case and will take all cases regardless of bullying behaviour seriously. The company understands that bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online. Low level disruption and the use of offensive and derogatory language can have a significant impact on its target. If left unchallenged or dismissed as banter it can also lead to a reluctance to report other behaviour. Early intervention can help to set clear expectations of the behaviour that is and isn't acceptable and help stop negative behaviours escalating.

**Online / Cyber Bullying:** The company is mindful of the rapid development of, and widespread access to, technology that provides opportunities for 'virtual' bullying, which can occur in or outside company or work placement. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience.

**Harassment:** Harassment is defined as unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading or humiliating environment. Harassment can be spoken or written abuse, physical gestures, facial expressions. Harassment can also be banter that is offensive to the person. Increasingly, harassment is happening through technology. This can involve sending inappropriate, or hurtful text messages, tweets, emails, instant messages, comments or posting malicious material online including on social networking websites), or sending, sharing or posting offensive or degrading comments, images or videos. Sexual violence and harassment are safeguarding issues and are managed alongside the safeguarding policy and procedure. Reports of sexual harassment will be taken seriously and reports of a sexual nature (both on and offline) must be referred to the safeguarding team.

**Victimisation:** Victimisation is when a person subjects another person to harm or damage because they have made allegations of harassment or discrimination, intend to make such an allegation or have assisted or supported a person in bringing an allegation. Victimisation is unlawful under harassment and discrimination legislation and will be treated as a form of harassment under this policy.

**Hate Crime and Hate Incidents:** The company acknowledges that bullying can take many forms and makes the link between bullying behaviours and hate crime incidents and hate crimes and will deal with any hate incidents and crimes seriously which may include police involvement as with any other serious bullying incidents as appropriate. A hate crime can be defined as any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's race or perceived race; religion or perceived religion, sexual orientation or perceived sexual orientation; disability or perceived disability or a person who is transgender or perceived to be transgender. A hate incident can be defined as any incident which the victim, or anyone else, thinks is based on someone's prejudice towards them because of their race,



religion, sexual orientation, disability or because they are transgender. Behaviours and conduct which can be considered as hate incidents are wide ranging and can include but not limited to:

- Verbal abuse
- Harassment
- Bullying or intimidation
- Threats of violence
- Physical attacks
- Abusive social media posts, text messages or phone calls, hate mail (all forms of online abuse)
- Creating, displaying or circulating discriminatory literature or poster

**Stalking:** Stalking can be defined as persistent and unwanted attention that makes people feel pestered and harassed. It includes behaviour that happens two or more times, directed at or towards a person by another person, which causes them to feel alarmed or distressed or to fear that violence might be used against them. It can go on for a long period of time, making people feel constantly anxious and afraid. Sometimes the problem can build up slowly and it can take a while to realise that it is an ongoing campaign of abuse. The problem isn't always physical; stalking can affect people psychologically as well. Social media, text messages, phone calls and the internet are often used for stalking and harassment and cyber stalking or online threats can be just as intimidating. The Suzy Lamplugh Trust define stalking as 'a pattern of fixated and obsessive behaviour which is repeated, persistent, intrusive and causes fear of violence or engenders alarm and distress in the victim'.

It can include but not limited to:

- Making unwanted communication
- Consistently sending gifts
- Physical or sexual assault
- Monitoring a person's use of the internet, email or any other form of electronic communication
- Loitering in any place, watching or spying on a person, following a person
- Interfering with any property of a person, damaging property.

#### 4.0 COMPANY ETHOS & CULTURE

Compass recognises that all forms of bullying especially if left unaddressed can have a devastating effect on individuals, have serious consequences on mental health and create a barrier to learning and impact on personal development. The company aims to create a culture and awareness that does not tolerate bullying, harassment, violence, derogatory language and discriminatory behaviour and will deal with any issues swiftly, consistently and effectively wherever they occur. By effectively preventing and tackling bullying, the company can help to create a safe and disciplined environment, where staff can work and learn free of harassment.

##### Our Community:

- Monitors and reviews our anti-bullying policy and practice on a regular basis.
- Supports staff to promote positive relationships to help prevent bullying.
- Recognises that some members of our community may be more vulnerable to bullying and its impact than others.
- Will intervene by identifying and tackling bullying behaviour appropriately and promptly.
- Ensures our staff are aware that bullying concerns will be dealt with sensitively and effectively; that everyone should feel safe to learn and abide by the antibullying policy.
- Requires all staff to work with the company to uphold the anti-bullying policy.
- Will deal promptly with grievances regarding the company response to bullying in line with our complaints policy
- Seeks to learn from good anti bullying practice elsewhere.
- Utilises support from the Local Authority, Police and other relevant organisations when appropriate.

##### Prevention - The company will:

- Create and support an inclusion environment which promotes a culture of mutual respect, consideration and care for others which will be upheld by all.
- Recognise that bullying can be perpetrated or experienced by any member of the community
- Openly discusses differences between people that could motivate bullying
- Challenge practice and language (including 'banter' which does not uphold the company values.
- Be encouraged to use technology positively and responsibly
- Work with staff, the wider community and outside agencies to prevent and tackle concerns of prejudice-driven bullying
- Actively create safe spaces, opportunities and a culture where staff feel confident to report any concerns.
- Celebrate success and achievements to promote and build a positive company ethos.

## Policy and Support - The Compass community will:

- Provide a range of approaches for staff to access support and report concerns.
- Regularly update and evaluate our practice to consider the developments of technology and provide up-to-date advice and education to all members of the company regarding positive online behaviour.
- Take appropriate, proportionate and reasonable action, in line with existing company policies, for any bullying brought to the company's attention, which involves or affects staff, even when they are not on company premises; for example, at social activities, work placement or online, etc.
- Implement appropriate disciplinary sanctions; the consequences of bullying will reflect the seriousness of the incident, so that others see that bullying is unacceptable.
- Use a variety of techniques to resolve the issues between those who bully, and those who have been bullied.

## Education and Training - The company will:

- Train all staff to identify all forms of bullying and take appropriate action, following the company's policy and procedures, including recording and reporting incidents.

## Involvement of staff - The company will:

- Involve staff in policy writing and decision making, to ensure that they understand the company's approach and are clear about the part they play in preventing bullying.
- Ensure that all staff know how to express worries and anxieties about bullying.
- Ensure that all staff are aware of the range of sanctions which may be applied against those engaging in bullying.
- Publicise the details of internal support, as well as external helplines and websites, and offer support to staff who have been or experiencing bullying and to those who are bullying to address the problems they have.

## Intervention and Responding to bullying:

Anonymity cannot always be guaranteed as the company has a duty to act to protect and safeguard staff, but every effort will be made to deal sensitively with the issues and, wherever possible maintain anonymity. A record of accusations of bullying behaviour and actions taken are kept in the staff records and also logged by category of bullying for monitoring purposes. When the company believes that bullying has occurred, it will be dealt with as a disciplinary matter through the disciplinary process. The disciplinary process considers the needs of vulnerable staff including those responsible for bullying. If the person making the allegation is dissatisfied about with how it has been dealt with, they have the right to appeal through the company's Complaints Procedure. The company works with and supports those responsible for bullying to understand the impact of their behaviour. The company will take all reports of bullying seriously and address them as quickly as possible with a focus on supporting those being bullied. The company will determine the nature and extent of the bullying and take appropriate actions in each case. The nature and level of support will depend on the individual circumstances and the level of need.



### Responding to Bullying

- If bullying is suspected or reported, the incident will be dealt with immediately by the member of staff who has been approached or witnessed the concern.
- The company will provide appropriate support for the person being bullied – making sure they are not at risk of immediate harm and will involve them in any decision making, as appropriate.
- The manager or other allocated and identified member of staff will interview all parties involved.
- The company will speak with and inform other staff members, where appropriate.
- Appropriate actions, including support and sanctions, as identified within the company behaviour and disciplinary policy, and support will be implemented in consultation with all parties concerned.
- If necessary, other agencies may be consulted or involved, such as the police, if a criminal offence (including hate crime incidents) has been committed.
- A clear and precise account of bullying incidents will be recorded by the company in accordance with existing procedures.
- This will include recording appropriate details regarding decisions and action taken.

When responding to Cyber-Bullying Concerns, the company will:

- Act as soon as an incident has been reported or identified.
- Provide appropriate support for the person who has been cyberbullied and work with the person who has carried out the bullying to ensure that it does not happen again.
- Encourage the person being bullied to keep any evidence (screenshots) of the bullying activity to assist any investigation.
- Take all available steps where possible to identify the person responsible.

This may include: looking at use of the company systems, identifying and interviewing possible witnesses and Contacting the service provider and the police, if necessary.

Work with the individuals and online service providers to prevent the incident from spreading and assist in removing offensive or upsetting material from circulation. This may include:

- Support reports to a service provider or other agencies (such as Professionals Helpline, CEOP, Revenge Porn Helpline) for advice and / or to remove content if those involved are unable to be identified or if those involved refuse to or are unable to delete content.
- Requesting the deletion of locally-held content and content posted online if they contravene company policies.
- Ensure that sanctions are applied to the person responsible for the cyberbullying;

The company will take steps to change the attitude and behaviour of the bully, as well as ensuring access to any additional help that they may need. Inform the police if a criminal offence has been committed. Provide information to staff regarding steps they can take to protect themselves online. This may include:

- advising those targeted not to retaliate or reply;

- providing advice on blocking or removing people from contact lists;
- helping those involved to think carefully about what private information they may have in the public domain.

#### Supporting Staff:

Staff who have been bullied will be supported by:

- Reassuring the student and providing continuous support.
- Offering an immediate opportunity to discuss the experience with their line manager/person of their choice.
- Being advised to keep a record of the bullying as evidence and discuss how to respond to concerns and build resilience as appropriate.
- Working towards restoring self-esteem and confidence.
- Providing ongoing support; this may include working and speaking with staff and offering formal counselling where appropriate.
- Where necessary, working with the wider community and local/national organisations to provide further or specialist advice and guidance.

Students who have perpetrated bullying will be helped by:

- Discussing what happened, establishing the concern and the need to change.
- Providing appropriate education and support regarding their behaviour or actions.
- If online, requesting that content be removed and reporting accounts/content to service provider.
- Sanctioning, in line with company behaviour and discipline policy
- Where necessary, working with the wider community and local/national organisations to provide further or specialist advice and guidance.

The company will take steps to change the attitude and behaviour of the bully, as well as ensuring access to any additional help that they may need. Inform the police if a criminal offence has been committed. Provide information to staff regarding steps they can take to protect themselves online. This may include:

- advising those targeted not to retaliate or reply;

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#### Keeping Records:

It is important that accurate and timely notes are investigations, and any such notes should include (investigations, possible):

- Date
- Time
- Place
- Name of person harassing them
- What need-to-know?
- How the person felt at the time
- Name of any witnesses
- Action taken and who it was reported to

Any correspondence relating to the incidents and subsequent complaints. Records will be stored confidentiality either with the Safeguarding team or with Corporate Services if a formal investigation takes place and notes with outcomes and action planning. Storage and retention of records will be in line with company GDPR.

#### Confidentiality:

At all stages of the procedure, the need to maintain confidentiality is paramount. Circulation of information and discussions will be minimised to that which is necessary to ensure a fair process. Information will be shared on a need-to-know basis investigations, safeguard and support all involved. In such cases, the complainant will be consulted prior to any action being taken however there may be cases where the company may need to involve other statutory agencies such as the police without the consent of the individuals involved.

#### Counselling:

Either party may request an appointment with to a counsellor at any time. The role of the company counsellor is to provide support and assistance during this time. The counsellor has no role in formal investigations, and neither are they a source of evidence in any proceedings, since all discussions between the Counsellor and client are confidential in line with BACP guidelines.

#### Complaints:

Formal complaints should be made to one of the Directors, in accordance with the company's Complaints Policy and Procedure.