MANOR GREEN APPRENTICESHIPS

Excellence for All

Harassment and Bullying Policy

1 Context

Manor Green Apprenticeships (MGA) has adopted Manor Green School's Golden Rule: to treat people kindly. All forms of harassment and bullying are unacceptable.

As an equal opportunities apprenticeship provider, it is our policy and practice to ensure all individuals associated with our organisation are treated fairly regardless of race, sex, gender reassignment, sexual orientation, marriage or civil partnership status, pregnancy or maternity, religion or belief, age or disability.

The following definitions are used.

Harassment includes any behaviour that upsets another person and that continues once that person or anyone else has indicated that they are upset by that behaviour.

Bullying is a sort of harassment. It is the repeated, intentional hurting or intimidation of a person or group by another person or group. Bullying can be physical, spoken, written or psychological. It can happen face to face or online.

More information about harassment and bullying may be found in Appendix 1.

This document aims to help MGA create and sustain an environment where apprentices and staff treat each other with dignity and respect to a standard above and beyond the legal framework set out in the Equal Opportunities Act 2010. Failure to follow this policy could lead to disciplinary action.

2 Policy objectives

Aimed at apprentices, this is part of a set of core documents that each apprentice must read.

This policy aims to help apprentices:

- understand what behaviour is unacceptable;
- recognise if they are being harassed or bullied;
- understand what to do if they feel they are being harassed or bullied;
- understand the professional consequences of harassing or bullying others;
- understand that all issues will be treated seriously and in confidence.

3 Related policies and documents

This policy operates within the context of the following policies and job-related guidance.

- MGA Equality and Diversity Policy
- MGA Expectations for High Standards
- Code of Conduct for Apprentices
- MGA Complaints Policy
- MGS Complaints Procedure

Apprentices should read this document in conjunction with their employer's:

- Staff Handbook,
- Dignity at Work policy
- Grievance policy
- Complaints procedure
- Online Safety/Acceptable Use policy
- Mobile Phone and/or Social Media policy
- Whistleblowing policy

4 Key points for apprentices

A What are harassment and bullying?

Harassment is behaviour that upsets you and continues once you have shown you dislike it. Bullying is a type of harassment. Appendix 1 has more details.

A heavy workload, demanding deadline, bad language or criticism of work is not necessarily bullying. This is true even if you do not like what is being said, dislike the other person, or disagree with what they want you to do. However, the person setting the work etc. must always take any concerns you raise seriously. They must not judge or criticise you for your concerns.

B What to do if you feel you are being bullied or harassed

We do not tolerate bullying in any form and strongly encourage you to raise any concerns.

Firstly, try to speak directly with the person concerned. This will often resolve matters. If you feel uncomfortable doing this, or if they do not take your concerns seriously, the person to contact will depend on who is involved.

- Normally, you should talk to your Assessor. They will help you follow the correct procedure.
- If your complaint is against your Assessor, you should talk to the Apprenticeship Manager. If the Apprenticeship Manager is also your Assessor, you should talk to the DDSL.

Pages 5-7 explain the process for allegations involving apprentices or MGA staff. Your employer's Bullying and Harassment policy will explain the process for allegations involving anyone else you work with.

C What to do if someone says you have bullied or harassed them

- Try to listen to their concerns calmly and without contradicting them.
- You can talk in confidence to your assessor or the Apprenticeship Manager.
- Appendix 2 has details of what might happen and the support available.

D Keep things confidential

Information about the alleged bullying or harassment should only be discussed with people directly involved in sorting things out. You should not copy other people into emails or talk about what is going.

E Keeping a record of incidents

All allegations will be taken seriously, with or without evidence. However, it will be helpful if you can record the date, time and content of any incidents.

5 Responsibilities

Apprentices are responsible for:

- reading this policy to understand what behaviour is considered unacceptable;
- ensuring that they do not encourage or commit any form of unacceptable behaviour (as described in Appendix 1) in relation to another apprentice or member of MGA staff;
- if safe, challenging any unacceptable behaviour by another apprentice or by MGA staff;
- reporting unacceptable behaviour using the procedures detailed in this policy;
- in addition, where unacceptable behaviour occurs at their place of work, reporting this behaviour to their line manager;
- co-operating with those who are responsible for carrying out any duties associated with this policy, including those carrying out an informal or formal complaints procedure.

The Headteacher is responsible for:

- responding to formal allegations of harassment or bullying by members of MGA staff.

The Apprenticeship Manager is responsible for:

- publicising and promoting this policy to existing and new apprentices, staff members of MGA and to all institutions with whom it has a partnership agreement;
- checking that all apprentices have signed the training plan to show that they have read this policy;
- ensuring all apprentices have access to a named and trained DDSL;
- giving procedural advice to staff or apprentices in relation to harassment/bullying;
- endeavouring to respond to informal complaints within 7 days;
- being the first contact point for an apprentice in the resolution process for allegations of harassment or bullying by other apprentices;
- submitting any formal allegation of harassment/bullying by an apprentice to HR;
- working with the Head of HR and DSL to ensure that:
    - disciplinary measures are applied fairly, consistently and reasonably;
    - the policy is acted on in all other ways.

The Head of Safeguarding is responsible for:

- training the Deputy Designated Safeguarding Lead (DDSL) and providing regular refresher training relevant to this policy;
- tracking concerns in CPOMS and initiating action/follow up as required.

The DDSL is responsible for

- keeping an anonymous record of complaints of unfair treatment, harassment and bullying on CPOMS, in line with best practice guidance.

Each Assessor is responsible for:

- publicising and promoting this policy to existing and new apprentices;
- ensuring all apprentices sign the Training Plan to confirm they have read the policy.
- giving advice to any apprentice subject to an allegation of harassment or bullying.

All staff working for MGA are responsible for:

- supporting, upholding and implementing this policy.

Key personnel

- Apprenticeship Manager: jackie.evans@manorgreenschool.co.uk
- Head of Human Resources: anna.weir@manorgreenschool.co.uk
- Deputy Designated Safeguarding Lead (DSL): Zoe.Rapley@manorgreenschool.co.uk
- Human Resources trained mediator: Anna.Weir@manorgreenschool.co.uk
- Apprentice Assessors
- Lead governor: Amy Crowle (Safeguarding)

6 Confidentiality

The complainant, alleged harasser and any witnesses, and staff involved in the resolution process must treat the complaint with as confidential. Information about the alleged harassment or bullying should normally only be shared with others on a "need to know" basis.

If, however, the member of staff involved in the resolution process believes there is an unacceptable risk to the complainant, another person or to MGA (e.g. if there is a danger of violence, or where a complaint identifies a criminal act or illegal discrimination), they have a legal duty to notify the lead DSL or Head of HR immediately.

7 Procedures for addressing harassment and bullying

Please note: it is helpful if the person who believes they are being bullied or harassed, or who witnesses something they believe to be harassment or bullying makes a record what happened as soon as possible after the event. Ideally, this will include the dates and details of what was said or done, and any emails or messages.

All forms of harassment and bullying are unacceptable, and allegations of bullying and/or harassment will be taken seriously, with or without a record of events.

Dignity and respect for all. MGA recognises that it has an equal duty of care to both the individual alleging unfairness and the alleged individual(s) committing harassment. An allegation will not presume to be proved until properly investigated and tested against a principal of reasonableness. Support will be available to all parties. Each individual will be treated with dignity, respect and without judgement throughout the complaints process.

1) Direct approach

MGA encourages the apprentice (the complainant) to raise their concerns with the person they believe to be exhibiting bullying or harassing behaviour before beginning the informal resolution process (2). They may also make a written request asking that person to stop the behaviour which is causing offence. The complainant does not need to explain why they find the behaviour offensive or inappropriate.

If the complainant does not feel comfortable making a direct approach, or if the person concerned refuses to take their concerns seriously, the complainant should start the informal resolution process.

2) Informal resolution process for an allegation of harassment or bullying

Apprentices should note that informal complaints are treated as seriously as formal complaints.

a) The apprentice should ask the to help resolve the matter informally. They will act impartially and in confidence to give the apprentice an opportunity to discuss issues of concern.

b) The Apprenticeship Manager will, in conjunction with the apprentice's HR team:

- explain their role;
- advise the apprentice of the routes and options for resolving the issue;
- explain what support is available, including directing the apprentice to a trained counsellor.

c) If the complaint is outside the remit of the apprentice-MGA relationship (e.g. alleged victimisation by a classroom mentor) the complainant will be directed to their employer's complaints process.

d) If the complaint falls within the remit of the apprentice-MGA relationship, the person(s) against whom the complaint has been made will be made aware of the nature of the complaint and given the opportunity to respond.

e) It is strongly recommended, in the interests of re-establishing good working relationships, that all parties who have been affected by a situation should meet together to help to resolve issues. The HR representative will facilitate all such meetings.

f) Both the complainant and the person against whom an allegation is made are entitled to be accompanied by another person (including a union representative) at any or all meetings.

g) Where the person against whom the complaint has been made indicates that they were unaware that their behaviour was unwelcome or offensive, steps to put matters right and prevent a recurrence will be agreed. This might include a reminder/explanation of what constitutes unacceptable behaviour, counselling, training, conciliation (with assistance of a third party, e.g. Unison), to help each party understand the other person's point of view and re-establish good working relationships.

h) Informal complaints will, under normal circumstances, be responded to within seven days.

If the matter is not resolved by the informal procedure, the complainant may start the formal resolution process.

3) Formal resolution process for allegation of harassment or bullying

There are three possible scenarios where a formal complaint might be made; each has a different procedure. The complainant may ask a colleague or union representative to help with submitting their allegation to the correct person. *Please note that complainants should first have attempted to resolve their concerns informally.*

3a) Allegation of harassment or bullying by an apprentice or group of apprentices

Details of the allegation should be submitted in writing to the Apprenticeship Manager, who will raise the complaint with the HR department of the apprentice's work setting.

The allegation will, under normal circumstances, be responded to within ten working days.

3b) Allegation of harassment or bullying by a member or members of MGA staff

Details of the allegation should be submitted in writing to the Headteacher of Manor Green School.

The allegation will, under normal circumstances, be responded to within ten working days.

3c) Allegation of harassment or bullying by a visitor to MGA

Details of the allegation should be given to the MGS Head of HR.

The allegation will be dealt with in accordance with the MGS harassment and bullying policy.

4) Recurrence of bullying

Where harassment or bullying reoccurs, this will become the responsibility of the employer, and subject to HR and performance management provisions.

5) Actions where a complainant does not wish to engage with the process

There may be occasions when a complainant, having made an allegation of harassment or bullying refuses to take action via the procedures outlined above.

In this instance, the member of staff responsible for managing the complaint should make sure the complainant understands options 1 – 3. If they still do not wish to proceed, the complainant's decision must be accepted unless there is an unacceptable risk to anyone concerned (see Confidentiality, above). The member of staff should record the complainant's wishes and write to the complainant confirming the situation and making clear that the responsibility for taking no action rests with the complainant.

8 Support available for the individual(s) against whom an allegation is made

An apprentice who is approached by a complainant about their behaviour, or who is the subject of an informal or formal complaint of harassment, bullying or victimisation, is entitled and encouraged to seek the advice of any of the following:

- Their assessor
- The Apprenticeship Manager
- The DSL or HR representative
- Mental Wellbeing Adviser (catherine.stewart@manorgreenschool.co.uk)

Advice on how to respond to someone who says you have harassed or bullied them is given in Appendix 2.

9 Malicious claims

If an investigation finds an allegation of harassment or bullying has been made in order to cause harm or detriment to the alleged offender, and that the claim is untrue, this may be grounds for disciplinary proceedings as detailed in the Apprentice Code of Conduct.

10 Promoting awareness of this policy

We will raise awareness of this policy via:

- Staff and apprentice induction
- Publication on The SchoolBus (MGA staff and internal apprentices)
- Publication on Qualsdirect (external apprentices)

11 Public Sector Equality Duty (Equality Act 2010)

MGA believes this policy does not prioritise or disadvantage any apprentice, member of MGA staff or partnering employer.

12 Monitoring and review

The Governors and Headteacher have overall responsibility for the maintenance and operation of this policy.

This policy will be reviewed annually and following any concerns and/or updates to relevant legislation, national/local guidance or procedures.

The Local Governing Board approved this policy on: 5 February 2026

Signed: Colin Hayfield, Chair of Governors

Signed: Helen Hannam, Headteacher & Principal

Date of review or revision	Description	Author or reviewing officer
March 2024	New policy	Apprenticeship Manager
May 2025	Annual review	Kate Hartup
February 2026	Ratified	Governors

Appendix 1

What the law says about harassment and bullying

The Equality Act 2010 protects anyone with the following 'protected characteristics' from any form of discrimination due to:

- age;
- gender reassignment, including where someone is proposing to undergo, is undergoing or has undergone a process (or part a process) for the purpose of reassigning their sex by changing physiological or other attributes of sex;
- being married or in a civil partnership;
- being pregnant or on maternity leave;
- disability, including physical or mental impairment, learning difficulty or disfigurement;
- race, including their colour, nationality, ethnic or national origin;
- religion or belief;
- sex;
- sexual orientation.

People also protected from any discrimination that arises because:

- they are associated with someone who has a protected characteristic (such as a family member or friend);
- they have complained about discrimination or supported someone else's claim.

Harassment is a form of discrimination. The Equality Act 2010 defines harassment as unwanted behaviour related to a "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.

For behaviour to count as harassment in equality law, it has to be one of three types:

Type 1:	Unwanted behaviour related to the protected characteristics listed above related to age, disability, race, sex, gender identity, religion or belief or sexual orientation.
Type 2:	Sexual harassment. This may be homosexual or heterosexual. It is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that creates an intimidating, hostile, degrading, humiliating or offensive environment. Specific examples of sexual harassment could include the invasion of personal space and inappropriate downloading of pornographic or sexually exploitative and degrading material by computer. Sexual harassment can occur of women by men, men by women, and also between members of the same sex. It can also refer to unwanted conduct that is related to the sex of another person
Type 3:	Less favourable treatment because of submission to or rejection of previous sexual harassment.

Is behaviour harassment or bullying?

Bullying is behaviour that intends to cause hurt or distress to another individual or group. Although bullying behaviour does not always amount to harassment under the Equality Act, no form of bullying is tolerated at Manor Green Apprenticeships.

Bullying includes any behaviour that is offensive, intimidating, malicious or insulting. It may be a one-off incident, but is often repeated or a pattern of behaviour that builds up over time. It includes:

- Psychological bullying
- Verbal (spoken or written) bullying
- Physical bullying
- Cyberbullying (harassment by electronic communication)

Is it banter?	It's not banter if …
Banter is teasing or joking between friends.	• You would be upset if someone said it to you. • It's hurtful. • You are not friends. • Someone has asked you to stop. • The target isn't laughing. • It focuses on someone's insecurities.

Harassment by electronic communication

Harassment may take place by any form of electronic communication. This includes e-mail, intranet, internet, social networking sites, text, mobile phones and landlines. Misuse of any form should be reported immediately.

Things that are not harassment or bullying

A heavy workload, demanding deadline or criticism of work is not in itself the same as bullying, even if an individual does not like what is being said, dislikes the other person, or disagrees with the task set.

However, the person setting the workload etc has a duty to consider any concerns raised by the apprentice without judging or criticising them, and the apprentice is entitled and encouraged to register their concerns as described in the policy.

The following are some features of harassment and bullying. **In the context of this policy, both are equally unacceptable and should be challenged.**

Typical of harassment	Typical of bullying
Target is seen as a victim. Perpetrator(s) is often part of a peer group.	Target is seen as someone to be dominated. It usually **but not always** involves someone in a position of authority bullying someone in a lesser position.
Often takes place in public i.e. to an audience	Often in private, unseen by others
Typically consistent	Typically unpredictable, irrational
Target is usually aware of harassment	Target may not realise for some time, but then realise seemingly small incidents add up to intimidation and victimisation
Focuses on individual differences, often any/all of the protected characteristics	Focuses on personal qualities e.g. competence or popularity.
May have a physical element e.g. contact, touch, intrusion into personal space, damage to possessions or sabotage of target's work	Sometimes physical but more usually psychological
Generally obviously rude or offensive. Might include: • physical attack • verbal and or physical intimidation • public humiliation • display of offensive material • incitement of others to commit acts • offensive language, statements or 'jokes' • innuendo or derogatory name calling • unwanted comments on appearance/dress • patronising language	**Often criticism or false or unfair allegations rather than offensive words. Might include:** • shouting • 'telling off' in front of colleagues or other people • non-constructive criticism • series of often minor comments belittling work, personality or appearance, • persistently ignoring or 'talking down' • pressuring someone into behaviour or actions against their wishes
Similar to bullying: • Deliberate unfair allocation of work or responsibilities • Exclusion from normal workplace conversation or activities	**Similar to harassment:** • Giving an unfair amount of work or responsibility • Exclusion or non-co-operation at work
A specific example of harassment might include intrusive questioning about a person's domestic circumstances or the sending of offensive emails.	**A specific example of bullying might include** copying emails that are critical about someone to others who do not need to know

Appendix 2

What to do if someone complains you have bullied or harassed them

The MGA Harassment and Bullying Policy details ways to resolve allegations of harassment and bullying (4 -6).

The policy advises anyone who feels they have been bullied or harassed to speak to the person concerned directly. This is because talking about things informally will probably stop the situation developing into a formal complaints procedure.

If someone says you have bullied or harassed them:

- Remember that:
    - differences in attitude, background or culture can mean that what is perceived as unacceptable behaviour by one person may not seem so to another.
    - behaviour which might have been regarded as acceptable in the past may not be appropriate now and may even be against the law.
- Try to listen to their concerns without getting defensive or playing down their concerns.
- Remember it was probably hard for them to speak to you about this.
- Try to understand why they have raised an issue.
- If you are not clear what you have done to upset them, ask them to provide an example of the behaviour. They do not have to say why they believe your behaviour was harassment or bullying.
- Apologise for the offence that was caused. You do not have to agree with the other person's point of view to say that you are sorry that an aspect of your behaviour upset them.

If this happens to you, you may find it difficult or stressful. You may find it helpful to talk to someone about how you feel about what has happened or how to make sure that you are still able to work effectively with the person who has approached you.

You can talk, in confidence, to:

- Your assessor
- The Apprenticeship Manager
- The MGA Deputy Direct Safeguarding Lead
- A member of your employer's HR team
- Counsellor /Mental Wellbeing Adviser

If a formal complaint is made about you or your behaviour, the Apprenticeship Manager and/or HR representative will help you understand your rights and the procedure that will be followed.