



Anti-Bullying and Harassment Policy

Version 6.0



Anti-Bullying and Harassment Policy

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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Rena Panesar	May 2019	May 2020	First Policy.
2.0	Rena Panesar	May 2020	May 2021	Updated.
3.0	Rena Panesar	May 2021	May 2022	Updated.
4.0	Rena Panesar	May 2022	May 2023	Updated.
5.0	Rena Panesar	May 2023	May 2024	Updated.
6.0	Policy Pros	Oct 2025	Oct 2026	Retemplated and updated.



Anti-Bullying and Harassment Policy

Introduction

Pathways LDN is 100% committed to maintaining a workplace and learning environment where every single person—staff member, learner, contractor, and partner—is treated with absolute dignity and respect.

We want to make it unequivocally clear that Pathways LDN operates a **Zero-Tolerance Policy** towards all forms of bullying and harassment. Any behaviour that violates a person's dignity, or creates an intimidating, hostile, or offensive environment, is fundamentally unacceptable and is a direct breach of our core values and will not be tolerated, regardless of the individual's role or seniority.

We encourage everyone to speak up, confident that any complaint made in good faith will be taken seriously, investigated thoroughly, and dealt with decisively.

Purpose

This policy is designed:

- To ensure that every individual—staff member, learner, contractor, and partner—is treated with absolute dignity and respect in all interactions and environments.
- To define what constitutes bullying and harassment, making it unequivocally clear that such behaviour is unacceptable and a direct breach of our core values.
- To uphold our legal obligations under the Equality Act 2010 and other relevant legislation by protecting all individuals from discrimination and harassment based on any protected characteristic.
- To maintain a positive, productive, and safe working and learning environment where all members of the community are encouraged and enabled to speak up and intervene when inappropriate behaviour is witnessed.
- To establish a transparent, fair, and confidential mechanism for reporting and investigating all instances of alleged bullying or harassment, and to ensure decisive disciplinary action is taken where necessary.



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Who and what this policy applies to

This policy applies to:

- All Staff (permanent, temporary, full-time, and part-time).
- Learners and Apprentices
- Contractors
- Partners (employers, third-party trainers, etc.)
- Any individual associated with our business.

The policy covers behaviour occurring:

- On Pathways LDN premises.
- At third-party training venues.
- At employer sites.
- During work or learning-related activities, such as social events, conferences, etc.
- Through work or learning-related communication channels, including email, social media, and virtual learning environments.



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Definitions

Bullying

Although there is no legal definition of bullying, it can be described as unwanted behaviour from a person or group that is either:

- offensive, intimidating, malicious or insulting
- an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone

Bullying might:

- be a regular pattern of behaviour or a one-off incident
- happen face-to-face, on social media, in emails or calls
- happen at work/during learning, or in other work/learning-related situations

Examples of bullying at work could include:

- constantly criticising someone or their work
- spreading malicious rumours about someone
- deliberately giving someone a heavier workload than everyone else
- excluding someone from team social events
- putting humiliating, offensive or threatening comments or photos on social media

Harassment

In discrimination law (Equality Act 2010), there are 3 types of harassment:

- harassment related to certain 'protected characteristics'
- sexual harassment
- less favourable treatment as a result of harassment



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Harassment related to a protected characteristic

This type of harassment is unwanted behaviour* related to any of the following protected characteristics:

- age
- disability
- gender reassignment
- race
- religion or belief
- sex
- sexual orientation

*Unwanted behaviour can include:

- a serious one-off incident
- repeated behaviour
- spoken or written words, imagery, graffiti, gestures, mimicry, jokes, pranks, and/or physical behaviour that affects the person

To be harassment, the unwanted behaviour must have either:

- violated the person's dignity
- created an intimidating, hostile, degrading, humiliating or offensive environment for the person

It can be harassment if the behaviour:

- has one of these effects, even though it was not intended
- intended to have one of these effects even if it did not have that effect



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Sexual harassment

Sexual harassment is unwanted behaviour of a sexual nature.

This type of harassment does not need to be related to a protected characteristic, but must have either:

- violated the person's dignity
- created an intimidating, hostile, degrading, humiliating or offensive environment for the person

Sexual harassment can be a one-off incident or an ongoing pattern of behaviour.

It can happen in person. It can also happen online, for example, in meetings, email, social media or messaging tools.

Examples include:

- making sexual remarks about someone's body, clothing or appearance
- 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 assault or rape

What some people might consider as joking, 'banter', can still be sexual harassment.

Sexual harassment is usually directed at an individual, but it's not always the case.

Sometimes there can be a culture of behaviour that's not specifically aimed at one person, such as sharing sexual images. Someone could still make a complaint of sexual harassment in this situation.

Stalking is a form of harassment, but the stalker will have an obsession with the person they're targeting, and their repeated, unwanted behaviour can make the victim feel distressed or scared.



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Stalking may include:

- following someone
- going uninvited to their home
- hanging around somewhere they know the person often visits
- watching or spying on someone
- identity theft (signing up to services, buying things in someone's name)
- writing or posting online about someone if it's unwanted or the person doesn't know

It's stalking if the unwanted behaviour has happened two times or more and made you feel scared, distressed or threatened.

Less favourable treatment as a result of harassment (victimisation)

This type of harassment is when someone experiences less favourable treatment because of how they responded to previous harassment.

It can apply whether the person rejected or 'submitted to' (accepted) the previous harassment.

Harassment happens when the person is treated less favourably than they would have been if they had not responded to the previous harassment in the way they did.



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Legal Framework

- The Equality Act 2010
- The Worker Protection (Amendment of Equality Act 2010) Act 2023
- Protection from Harassment Act 1997
- Employment Rights Act 1996
- Education Act 2002, section 175 (England)
- Further and Higher Education Act 1992 and subsequent instruments
- Safeguarding Vulnerable Groups Act 2006
- Keeping Children Safe in Education (statutory guidance)
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Human Rights Act 1998 (especially Articles 8, 10, 11)
- Malicious Communications Act 1988
- Communications Act 2003, section 127
- Online Safety Act 2023
- Public Interest Disclosure Act 1998 (whistleblowing)



Roles and Responsibilities

Learners

- To treat others with dignity and respect.
- To be familiar with this policy, their code of conduct and their employer policies, and understand what is expected of them.
- To report cases of bullying or harassment to Pathways LDN (and their employer as appropriate).

Staff

- To treat everyone at work with dignity and respect.
- To promote a culture where respect thrives and where bullying and harassment are never tolerated.
- To be familiar with this policy and understand what is expected of them.
- To ensure they take appropriate action if bullying or harassment occurs, ensuring all incidents are dealt with fairly, promptly and in strict confidence.
- To report cases of bullying or harassment to the Directors.

Directors

- To promote a culture where respect thrives and where bullying and harassment are never tolerated.
- To ensure this policy is implemented effectively across the organisation.
- To promptly investigate and appropriately manage serious incidents, ensuring that disciplinary action is taken where necessary.
- To ensure that there is a fit-for-purpose and up-to-date policy in place.



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Policy

Preventing Bullying and Harassment

At Pathways LDN, we are dedicated to creating a culture built on respect, inclusivity, and wellbeing.

Our approach includes:

- Implementing a clear anti-bullying and harassment policy (which is available on our website).
- Communicating our expectations in regard to behaviour to all staff and maintaining a clear staff code of conduct.
- Communicating our expectations in regard to behaviour to all learners on induction and maintaining a clear learner code of conduct.
- Requiring all staff (including senior managers) to model exemplary behaviour at all times and to challenge inappropriate conduct immediately upon witnessing it, even if a formal complaint has not been made.
- Fostering a culture and an atmosphere where individuals feel safe and empowered to raise concerns early.

Victimisation

All complainants will be protected from victimisation for raising a complaint or assisting in an investigation relating to bullying and/or harassment.

Retaliation against any staff member, learner, contractor or partner who has raised a complaint about or assisted in an investigation of bullying or harassment will be regarded as a serious disciplinary offence/breach of our standards and will be dealt with accordingly.

Everyone has the right to feel safe and be treated with dignity and respect, just as they have the right to be treated fairly when making or supporting a complaint.



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Procedures

Stage 1: Informal Resolution

In many cases, an informal approach can resolve the issue quickly, particularly if the perpetrator is unaware that their behaviour is offensive.

- The complainant may ask the person responsible to stop the behaviour, either verbally or in writing.
- The complainant may ask a trusted staff member to speak to the person responsible on their behalf.

In some cases, an informal mediation session may also be useful, particularly for low-level, first-time incidents where both parties consent, where there is no safeguarding concern, and the complainant feels safe.

Stage 2: Formal Complaint

If the informal approach is inappropriate, has failed, or if the case is serious, a formal complaint should be made.

- For learners and other non-staff members, complaints should be made under our **Comments and Complaints Policy**.
- For staff, complaints should be made under our **Grievance Policy**.

In all cases:

- Complaints will be taken seriously.
- Complaints will be escalated to the Directors.
- Complaints will be acknowledged within 2 working days.
- Complaints will be thoroughly investigated. (Note: investigations may be paused if requested by the police or another authority, so we do not risk prejudicing any formal investigation.)
- Interim safety measures may be put in place while the investigation is ongoing.
- Outcomes will be decided on the balance of probabilities, taking into account all available evidence and the harm that has occurred.



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Reporting Crimes to the Police

If a crime has been committed, we will always ask the victim or the person making the complaint to report the matter to the police.

If they do not want to report the crime, we may respect their wishes. However, in some circumstances, we may report the matter even without their consent. For example, if there's an ongoing risk to the person's safety or the safety of others or if a child has been abused or may be in danger. If we need to do this, we will:

- Tell the victim/person who made the complaint first.
- Let them know once you've reported it to the police.

You can make a police report:

- By Phone: 999 if someone is in danger and 101 for non-emergencies
- Online for stalking or harassment:
<https://www.police.uk/pu/contact-us/stalking-harassment/>
- Online for sexual offences:
<https://www.police.uk/ro/report/rsa/alpha-v1/v1/rape-sexual-assault-other-sexual-offences/>

Supporting Victims and Others Affected

Pathways LDN is committed to providing appropriate support not only to the victim of bullying or harassment but also to anyone else who may be affected by the incident or subsequent investigation. Support may include, but is not limited to:

- Taking immediate, practical steps to prevent further distress.
- Offering confidential debriefing sessions where those affected can talk through what happened and let us know how we can best support them.
- Signposting to or providing those affected with access to external support resources, such as confidential counselling services, to help them cope with the stress and trauma of the situation.
- Guaranteeing that the victim will face absolutely no victimisation, retribution, or negative career impact as a result of making or supporting a complaint in good faith.



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Non-Compliance

Any proven instance of bullying or harassment, regardless of whether it is an isolated event or a recurring pattern, will be treated as a serious matter.

- Where an employee breaches this policy, we will take disciplinary action.
- Where a non-employee (contractor, agency worker, etc.) breaches this policy, they may be warned about their conduct or, in the case of serious offences, have any working contract/arrangement terminated.
- Learners who breach this policy will be sanctioned appropriately, whether this be by issuing a warning or, as appropriate, making the decision that they will no longer be welcome to access our services.
- Partners who breach this policy may be subject to the termination of any partnership relationship.
- Members of the public will be warned about their conduct and may be asked to leave the premises, and may be barred from returning or having further contact with us.

In addition, where bullying may be criminal, we will not hesitate to inform the authorities.

Monitoring

The Directors are responsible for monitoring the effectiveness and compliance of this policy through annual review and continuous data analysis. This process includes:

- Analysing data from all formal complaints and informal complaints that are reported to identify patterns, repeat offenders, or areas of high risk (e.g., specific departments, training venues, or forms of communication).
- Collecting stakeholder feedback relating to this policy and our processes – are they working in practice, and could they or the way we manage bullying and harassment be improved?

The results of the monitoring process will be used to drive specific improvements across the organisation.



Reviewing

Pathways Ldn Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.

This policy will be made available in other formats upon request, and all learners are encouraged to speak to any member of staff if they have any questions or require clarification.