Bullying and Harassment Policy

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1. Introduction

1.1 South Cumbria Skills Exchange (SCSE), operated by Whamos Training and Development CIC, is committed to ensuring that all staff, volunteers, trustees, learners, and partner organisation representatives are treated with dignity and respect, free from harassment and bullying at all times. SCSE acknowledges its duty of care to all individuals involved in its activities, particularly given that its learner cohort includes children and young people under the age of 16. Even unintentional harassment or bullying is unacceptable.

1.2 SCSE will take all allegations of harassment or bullying seriously and address them promptly and confidentially where possible. All employees, trustees, volunteers, and sessional workers must comply with this policy and take appropriate action to ensure such conduct does not occur. Harassment or bullying will, subject to investigation findings, be dealt with under SCSE Disciplinary Procedure. In some cases, it may amount to gross misconduct leading to summary dismissal or termination of engagement.

1.3 This policy applies to conduct which occurs both in and out of the workplace, including during SCSE activities, off-site visits, events, work-related social functions, and on social media and online platforms. It covers bullying and harassment by staff, trustees, volunteers, learners, and third parties such as partner organisations, suppliers, and visitors.

1.4 Where a learner under the age of 18 is involved in a bullying or harassment incident – whether as a victim, alleged perpetrator, or witness – SCSE Safeguarding and Child Protection Policy and Procedures must be consulted and the Designated Safeguarding Lead (DSL) notified without delay.

1.5 This policy does not form part of any employee's contract of employment, and SCSE may amend it at any time or depart from it where considered appropriate.

1.6 This policy sits alongside the **Anti-Bullying Policy**, which focuses on bullying between learners and on response procedures within learning provision. Where an incident involves both a learner and an adult, or where it crosses both contexts, both policies will apply in parallel.

2. What is Harassment?

2.1 Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

2.2 It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

2.3 Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

2.4 Harassment may include, for example:

- Unwanted physical conduct or 'horseplay', including touching, pinching, pushing, grabbing, brushing past someone, invading personal space, and more serious forms of physical or sexual assault;
- Unwelcome sexual advances and suggestions that sexual favours may further a career or that a refusal may hinder it;
- Continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- Sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted online);
- Offensive or intimidating comments or gestures, or insensitive jokes or pranks;
- Mocking, mimicking or belittling a person's disability;
- Racist, sexist, homophobic or ageist jokes, or derogatory remarks about a particular ethnic or religious group or gender;
- Outing or threatening to out someone as gay, lesbian, bisexual, or transgender;
- Ignoring or shunning someone, for example by deliberately excluding them from a conversation or social activity;
- Online or cyber harassment including harmful, threatening, or offensive messages sent via social media, email, messaging apps or any other digital platform.

2.5 A person may be harassed even if they were not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment.

2.6 Where any form of harassment involves a learner under the age of 18, this will be treated as a safeguarding matter and referred to the DSL immediately, in addition to any other action taken under this policy.

3. What is Bullying?

3.1 Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority – it can include personal strength and the ability to coerce through fear or intimidation.

3.2 Bullying can take the form of physical, verbal and non-verbal conduct. Examples include:

- Shouting at, being sarcastic towards, ridiculing or demeaning others;
- Physical or psychological threats;
- Overbearing and intimidating levels of supervision;
- Inappropriate and/or derogatory remarks about someone's performance;
- Abuse of authority or power by those in positions of seniority;
- Deliberately excluding someone from meetings or communications without good reason;
- Cyberbullying – using technology to send threatening or humiliating messages, post harmful content online, share images without consent, or engage in targeted online harassment.

3.3 Legitimate, reasonable and constructive criticism of a worker's performance, or reasonable instructions given in the course of employment or engagement, will not in themselves constitute bullying.

3.4 Where bullying involves a learner under the age of 18, this must be reported to the DSL as a potential safeguarding concern, and the Child-on-Child Abuse Policy should also be consulted where relevant.

4. Responsibilities

4.1 Director

- Ensures SCSE has appropriate policies and procedures in place and that they are implemented effectively.
- Takes ultimate organisational responsibility for the welfare of all staff, volunteers, and learners.
- Ensures all managers understand and fulfil their responsibilities under this policy.

4.2 All Managers and Supervisors

- Model appropriate standards of behaviour at all times.
- Address and report any witnessed or reported incidents of bullying or harassment promptly.
- Ensure all staff and volunteers within their area are aware of this policy.
- Support individuals making complaints and ensure they do not suffer detriment as a result.

4.3 All Staff, Volunteers and Sessional Workers

- Treat all colleagues, learners, and visitors with dignity and respect.
- Report any concerns about bullying or harassment to their line manager or the Director.
- Co-operate fully with any investigation carried out under this policy.

4.4 Designated Safeguarding Lead (DSL)

- Must be notified immediately where any incident of bullying or harassment involves a learner under the age of 18.
- Oversees the safeguarding response and liaises with external agencies as required.
- Maintains records of all safeguarding-related incidents in accordance with SCSE Safeguarding and Child Protection Policy.

5. Informal Process

5.1 If you are being bullied or harassed, you should attempt to resolve the situation informally if it is safe and appropriate to do so. The objective is to resolve the difficulty with the minimum of conflict. It is possible that the individual responsible does not realise the effect of their behaviour. You should explain clearly to them that their behaviour is not welcome or makes you feel uncomfortable.

5.2 If you would find it too difficult to speak directly with the other person, you should communicate through a third party such as a colleague, line manager, or a trade union representative.

5.3 If the informal approach is not appropriate or has not resolved matters, you should follow the formal procedure below.

5.4 Where any aspect of the incident involves a person under the age of 18, informal resolution is not appropriate. The matter must be escalated directly to the DSL and/or the Director.

6. Formal Procedure

6.1 Complaints should be submitted in writing to your line manager or, if they are the subject of the complaint, to the Director.

6.2 SCSE will follow its Grievance Procedure for formal complaints by staff and volunteers. A copy of this procedure is available from the Director.

6.3 Where a complaint involves a learner under the age of 18, SCSE Safeguarding and Child Protection Policy and Procedures will apply alongside this policy. External agencies including the Local Authority Designated Officer (LADO) or Children's Social Care may be involved as appropriate.

6.4 SCSE will ensure that formal complaints are investigated promptly, fairly, and impartially. The investigator will be someone with no prior involvement in the matter.

6.5 Both parties will be kept informed of progress and outcomes as appropriate and in compliance with data protection obligations.

7. Protection and Support for Those Involved

7.1 Anyone who makes a complaint or participates in good faith in an investigation under this policy must not suffer any form of retaliation or victimisation as a result.

7.2 If you believe you have suffered retaliation or victimisation, you should inform your line manager or the Director. If the matter is not remedied, raise it formally under the Grievance Procedure.

7.3 Anyone found to have retaliated against or victimised someone for making a complaint or assisting with an investigation may be subject to disciplinary action.

7.4 SCSE will ensure that appropriate support is provided to all parties during and after an investigation, including signposting to external support services where appropriate.

8. Safeguarding and Child Protection

8.1 SCSE works with learners of all ages, including children under the age of 16. The safety and welfare of all learners is paramount.

8.2 Any incident of bullying or harassment involving a learner under the age of 18 will be treated as a safeguarding matter. The DSL must be informed immediately and SCSE Safeguarding and Child Protection Policy and Procedures will be followed.

8.3 Where appropriate, SCSE will refer matters to external agencies, including the LADO, Children's Social Care, or the police.

8.4 Staff and volunteers must not investigate safeguarding matters themselves. All concerns must be directed to the DSL without delay.

8.5 SCSE will ensure that all staff, volunteers, and sessional workers receive appropriate safeguarding training and are aware of their responsibilities in relation to this policy.

9. Online and Social Media

9.1 Bullying and harassment conducted online or via social media is taken equally seriously as face-to-face conduct. This includes harmful behaviour on social networking sites, messaging platforms, email, and any other digital channels.

9.2 Staff, volunteers, and learners must not use digital platforms to bully, harass, humiliate or threaten others connected to SCSE, whether during or outside of SCSE activities.

9.3 Evidence of online bullying or harassment should be preserved (e.g. screenshots) and reported promptly.

9.4 Where online behaviour involves a learner under 18, it must be referred to the DSL and may involve the police.

10. Confidentiality and Data Protection

10.1 Confidentiality is an important part of the procedures provided under this policy. Everyone involved in the operation of the policy is responsible for observing the high level of confidentiality required. Details of any investigation and the identities of those involved must only be disclosed on a 'need to know' basis.

10.2 Information about a complaint may be placed on the relevant personnel or volunteer file, along with a record of the outcome and any associated documents, retained in compliance with GDPR and the Data Protection Act 2018.

10.3 Breach of confidentiality may give rise to disciplinary action.

10.4 Where matters relate to child protection, confidentiality obligations do not override the duty to share information with appropriate agencies to protect the welfare of a child.

11. Policy Ownership and Review

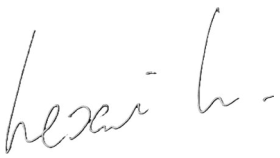
11.1 The Board of Trustees has overall responsibility for the effective operation of this policy and has delegated day-to-day responsibility to the Director.

11.2 All managers have a specific responsibility to operate within the boundaries of this policy, ensure that all staff and volunteers understand the standards of behaviour expected, and to take action where behaviour falls below these standards.

11.3 This policy will be reviewed annually, or sooner in response to any changes in legislation, regulatory guidance, or operational need.

Approval & Review

This policy has been approved on behalf of the Directors:

Elizabeth Amos-Milburn *Co-Director*	**Alexandra Gager-Liebhart** *Co-Director*
	

Date of approval: 18th May 2026

Next review: 18th May 2027

Schedule 1 — Record of Changes

Version	Date	Nature of Change
001	18th May 2026	Initial published version included in the Combined Policies and Procedures 2026 edition.