

# ANTI-BULLYING AND HARASSMENT POLICY

FOR APPRENTICESHIP AND  
VOCATIONAL TRAINING  
PROGRAMMES, UK

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## VERSION CONTROL

Version	Date	Comment	Author	Review Due
1	23/04/24	Policy Created	SW	23/04/25
2	23/04/25	Policy Reviewed	SW	24/0426

### COMMUNICATION

The content of this policy is communicated to all colleagues and learners during their induction phase and at other times through team meetings and email communications. A copy of the policy is always available on MSTeams.

### MONITORING AND REPORTING

Implementation of the policy is monitored by the Quality and Compliance Manager and reported to the Operations Director.

### POLICY REVIEW

This policy will be reviewed annually, or sooner if deemed necessary.

Signed:



**Position:** Operations Manager

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# 1. PURPOSE

Vertex Company UK 1 Limited, trading as Vertex Professional Services (VPS) are committed to creating and maintaining an inclusive working and learning environment that respects and celebrates difference. Everyone has the right to participate in a climate free from discrimination or harassment on the grounds of their race, disability, gender, gender reassignment, age, nationality, sexual orientation, religion or belief, marital or civil partnership status, or socio-economic background or class.

This policy provides a framework to assist the prevention of bullying and harassment and provides:

- A process for dealing with allegations of bullying and harassment.
- A template for recording conversations about bullying and harassment.
- Guidance on the action that should be taken when such incidences occur.

# 2. SCOPE

This policy applies to all learners and all persons working in support of VPS activities on its UK vocational training programmes, including employees, contractors, vendors, and consultants.

# 3. RECOGNISING BULLYING AND HARASSMENT

## 3.1 BULLYING

Bullying involves persistent criticism, personal abuse (physical or verbal) and/or ridicule either in public or private, which humiliates, offends and demeans the individuals involved. Bullying is behaviour that is unwanted, unwelcome, inappropriate, and unacceptable to the person receiving it, causing them distress, unease, stress, and possible loss of self-confidence or self-esteem.

*Bullying may appear as:*

- Demeaning, intimidating, malicious or offensive behaviour
- Persistent taunting
- Physical violence or violent gestures
- Spreading malicious rumours or insulting staff/learners
- Cyber-bullying - making offensive comments on websites, social networking sites or message boards about an individual
- Sending / copying sms texts or emails that are critical of a person
- Picking on a person or setting a person up to fail
- Ignoring or excluding an individual(s) from the team or group
- Treating an individual less favourably than another
- Overbearing supervision or misuse of power
- Deliberately overloading learners and constantly criticising them
- Blocking training or learning opportunities

*However, bullying can be more subtle, such as:*

- Giving someone an impossible deadline
- Giving an individual menial tasks to complete
- Withholding information or giving false information

## 3.2 HARASSMENT

Harassment happens when someone behaves in such a way that a person's dignity is violated, or behaves in such a way that they create an environment that is offensive, hostile, degrading, humiliating or intimidating for a person, where this is:

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- Related to a protected characteristic <sup>1</sup>
- Of a sexual nature (sexual harassment)
- Where a person is treated less favourably because they have either submitted to or rejected sexual harassment
- harassment related to sex or to gender reassignment (this is known as 'consequential harassment')

This is a broad definition that protects people who are offended by conduct, even if it is not specifically directed at them. For example, a white learner who sees a person from a black and minority ethnic background being subjected to racially abusive language and complains that this has caused their environment to be offensive, even though they are white and not the subject of the abuse. It also protects people from harassment because they associate with someone with a protected characteristic or because they are perceived to have a protected characteristic, for example a learner who experiences harassment because he associates with another learner who is a disabled learner or because he is perceived to be gay.

*Harassment may appear as:*

- Unwanted physical conduct including touching, patting, pinching, insulting or abusive behaviour or gestures, physical threats or assault
- Unwanted verbal conduct including jokes or banter which refer to a person or group's gender, colour, race, age disability or other protected characteristic

*Sexual Harassment may include:*

- Unwelcome sexual advances or requests for sexual favours
- Sexually oriented statements, sexual gestures, whistles, jokes or comments about a person's sexual experience or physical characteristics

The Equality Act 2010 recognises nine protected characteristics: race, disability gender, gender reassignment, age, sexual orientation, religion / belief, pregnancy / maternity and marriage / civil partnerships. The Act does not specifically cover harassment on the grounds of pregnancy / maternity or marriage / civil partnerships.

However, direct discrimination prohibits treatment such as bullying or harassment which results in a person being treated less favourably, such as:

- Sexual innuendo, suggestive comments, sexually oriented "kidding," or "teasing," or "practical jokes"
- Physical conduct of a sexual nature such as touching, pinching or brushing against another person's body, hair or clothing, or blocking someone's path to force contact
- Posting, displaying, or distributing sexually oriented photos, films or videos, drawings, etc.

## 4. POLICY

- Bullying or harassment is harmful to all individuals. VPS has a zero tolerance to bullying or harassment - either on-site or off-site (for example at the place of accommodation such as a hotels etc).
- Every learner has a personal responsibility not to harass or bully other learners or members of staff.
- All staff, learners and individuals involved in the vocational training programmes for VPS have a responsibility to recognise bullying and harassment and take appropriate action in accordance with this policy immediately they become aware of any such behaviour.

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- Allegations of bullying or harassment received either formally or informally will be dealt with promptly and sensitively.
- Any bully or harasser may be subject to disciplinary action in relation to the vocational training programme, which may result in his/her suspension or expulsion from the vocational training programme.

## 5. REPORTING BULLYING AND HARASSMENT

Any learner who believes that he/she or others have been harassed or bullied should raise the matter through the procedure set out below.

VPS staff members and others supporting the VPS vocational training programmes who believe that a learner has been harassed or bullied must deal with the issue through the procedure set out below.

VPS has developed an informal and formal procedure to deal with allegations of harassment and/or bullying. Any incident of bullying and harassment that is reported by a VPS member of staff, learner or parent will be treated with the strictest confidence. Staff dealing with these matters will show empathy and respect and will deal with the allegation in a sensitive and non-judgemental manner.

VPS will take the necessary measures to ensure the safety and well being of the victim. Witnesses will also be treated fairly and respectfully and protected from victimisation.

## 6. ACTION TO BE TAKEN ON REPORTED BULLYING AND HARASSMENT

### 6.1 IF A LEARNER CONFIDES IN A MEMBER OF STAFF THAT THEY ARE BEING BULLIED OR HARASSED:

All reports of bullying / harassment should be taken seriously and treated sensitively. It is important to recognise that learners who experience bullying or harassment may feel particularly vulnerable and may require support to deal with the experience and / or report the experience.

If a learner confides in you that they are being bullied or harassed, you should inform the learner of the formal procedures and discuss how they want to proceed. You should listen to the individual concerned and make such enquiries necessary to clarify exactly what has been happening. You should reassure the individual that they have acted correctly by reporting this to someone who may assist.

If they do not want to formalise the incident then you should

- Explain that they can choose to formally report the harassment or bullying at a later date or if it happens again. They can talk to a tutor, a programme manager, their Assessment and Employment Coach (AEC) or any member of VPS staff
- Encourage the student to formally report the incident if it happens again. If a repeat incident does occur, and the student still does not want to formalise the incident, it would be helpful to make a note of the conversation and talk informally with the operations manager
- Make the learner aware of support services available to them and how to access these, for example stress counselling
- Bring the information to the attention of the operations manager who may seek external guidance if appropriate

You may find the information in appendix A helpful, as this provides [guidance on how to handle different types of bullying and harassment](#)

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VPS reserves the right however to treat any matter as serious misconduct and deal with it following the formal procedure described below.

*If they want to formalise the incident(s) then you should:*

- Support the learner to complete a bullying / harassment report form (see appendix B), following the guidance in appendix A
- Explain that the incident will be investigated using the relevant VPS disciplinary procedures, starting at the informal stage, or if more serious, the formal stage
- Explain to the learner that they will be kept informed of any action that will be taken to investigate the allegation
- Make the learner aware of support services available to them and how to access these, for example stress counselling

Programme managers will discuss with the complainant the actions to be taken which may result in a series of informal 3-way meetings between complainant, alleged perpetrator and a facilitator. The purpose of the meeting will be to aim to resolve the bullying or harassment issue.

#### 6.2 IF A MEMBER OF VPS STAFF WITNESSES A BULLYING / HARASSMENT INCIDENT:

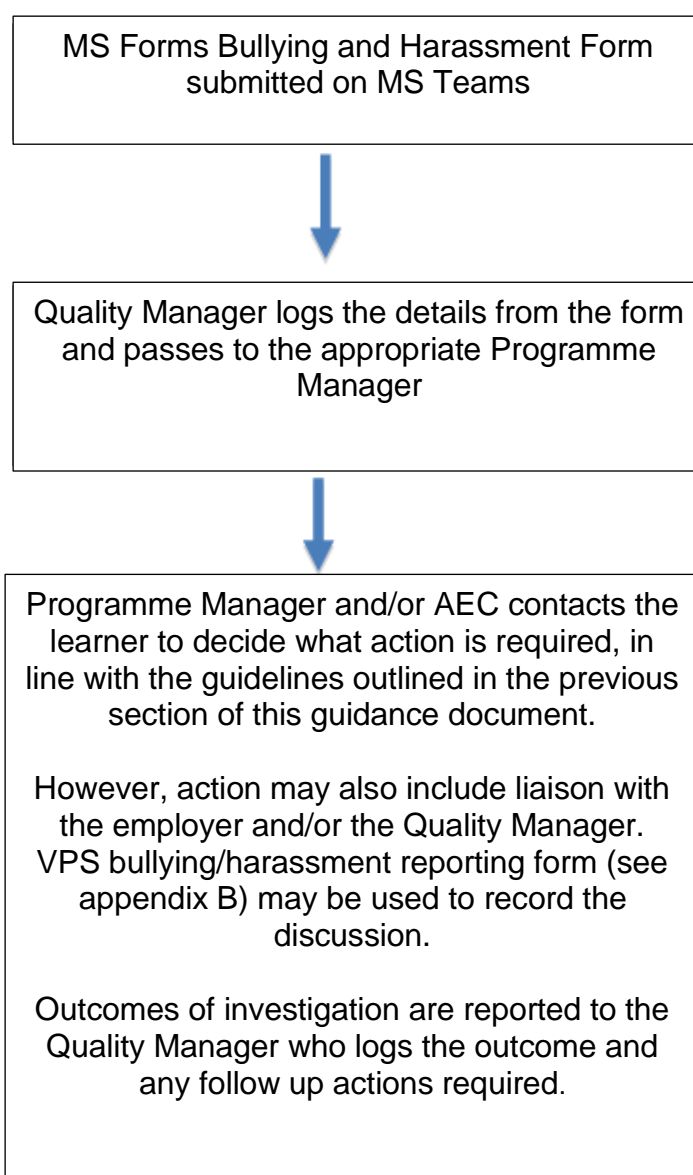
All incidents of bullying or harassment should be taken seriously and treated sensitively. You should:

- Obtain the name of the learner(s) concerned and ensure the incident is reported to the Programme Manager or Assessment and Employment Coach (AEC) as soon as possible (the Programme Manager / Assessment and Employment Coach will follow guidelines below)
- For serious incidents you should inform the Programme Manager or Quality Manager who can suspend the learner(s) if necessary
- If the learner is at risk of harm, you should inform the Safeguarding Officer
- Make the learner aware of support services available to them and how to access these, for example stress counselling

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## 7. STAFF PROCEDURES FOR DEALING WITH AN INCIDENT OF BULLYING OR HARASSMENT IN THE WORKPLACE

Learners on VPS training programmes may experience bullying or harassment in their workplace. All learners can raise an issue at any time by completing the Bullying and Harassment Form that is available on MSTeams. The following process is followed if a learner raises a Bullying or Harassment issue.



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## 8. ACTION TO BE TAKEN FOLLOWING A FORMAL COMPLAINT

Upon receipt of a formal complaint VPS will undertake the following actions

### *Initial Meeting with the Complainant*

- The AEC & Programme Manager responsible for the programme of learning will meet the complainant and record in writing the nature of the complaint and ensure that the complainant is aware of the procedure.
- The complainant has the right to be accompanied by his/her parent(s), carer, guardian(s) or someone acting as an advocate.
- The relevant staff member should follow up and talk to all individuals concerned (person being bullied and bully), agree actions and follow them through. All details should be recorded and held on the learner(s) file(s).
- Employers, mentors, programme managers and parents/carers should be involved as appropriate and with full agreement of the individual concerned. See Appendix A, **Guidance on how to handle different types of bullying and harassment.**
- Specific actions by bully/bullies (e.g. violence, theft, touching etc.) may be subject to suspension or expulsion from the vocational training programme and will need to be reported to employers and/or the authorities.
- The complainant/learner should be fully supported by the relevant staff member until the situation has been brought to a satisfactory result and fully resolved.
- Action on receiving a complaint will commence within 24 hours.
- The complainant will receive a written acknowledgement of the report and outcomes.

## 9. INFORMING THE ALLEGED PERPETRATOR

- The alleged perpetrator will be notified in writing of the allegation against them and will be invited to an investigative meeting. The procedure will be explained to the alleged perpetrator.
- The meeting with the alleged perpetrator will normally take place within 5 working days of receipt of the complaint.
  - The alleged perpetrator will be informed that disciplinary action may be taken against him/her.
  - The perpetrator will be informed that they may be accompanied at all times by parent(s)/carers or guardian(s).
  - It must be made clear that any person accompanying the perpetrator is not permitted to comment during the meeting(s).
  - The meeting(s) will be chaired by the AEC & Programme Manager or the Operations Manager, depending on the severity of the case.

## 10. OUTCOME OF INVESTIGATION

- Having obtained all the required information, including interviewing any witnesses, the Quality Manager will consider whether the complaint is substantiated and will decide on the appropriate course of action which will be communicated to the complainant and alleged perpetrator.

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- Records of investigations, outcomes and actions taken will be recorded on personnel files / learner files for up to 6 months.
- The guidance in [Appendix A: Guidance on how to handle different types of bullying and harassment](#) of this document should be considered.
- If the incident of bullying and or harassments is deemed to be serious then the matter should also be reported to the NSPCC Helpline for impartial advice. The decision to take this course of action is the responsibility of the senior management (operations or above).
- If, following discussions with the NSPCC, it is decided to contact the police this action is to be completed by senior management (operations or above).

## 11. MONITORING AND REVIEW

Records of allegations of harassment / bullying, including how and where they occurred and their ultimate conclusion will be made. These will be reviewed each year to ensure that issues are being handled in a reasonable and effective manner to identify problem areas and identify training needs

## 12. VPS STAFF TRAINING

All VPS staff responsible for the learning of apprentices of the age 14-25 will, within 3 months of their employment, complete:

- Bullying and Harassment Training
- Equality and Diversity Training
- Sexual Harassment Training
- Online and Cyber Safety Training
- Mental Health Awareness

All VPS staff responsible for the learning of apprentices of the age 14-24 will within 12 months of their employment complete:

- Level 2 & 3 Child Protection - Safeguarding Training

This document forms part of the Equality & Diversity policy. It will be reviewed annually and updated in accordance with current legislation.

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## 13. APPENDICIES

### APPENDIX A: GUIDANCE ON HOW TO HANDLE DIFFERENT TYPES OF BULLYING AND HARASSMENT

Remember each learner has the right to feel happy, safe and valued on vocational training programmes.

You are helping a bully by:

- Providing an audience
- Not supporting someone who is being bullied
- Passing on harassment notes or emails / social networking posts
- Passing on rumours
- Laughing at a bully's actions

Positive action to help eradicate bullying.

- Take assertive action - tell the bully how you feel
- Discuss it with your parents, carer, your supervisor at work, Assessment and Employment Coach (AEC), colleague, friend or mentor
- Assess your own behaviour
- Avoid situations that lead to bullying
- Talk to a trusted person
- Keep a diary of events when incidents occur

#### Guidance to staff on how to treat different types of bullying and/or harassment:

##### Low level

This should be handled quickly and sensitively. An appropriate member of staff should:

- Talk with the person being bullied to let them know that you understand how they feel
- Demonstrate to those who have been bullying, the distress their behaviour has caused, help them understand that the behaviour is unacceptable, and encourage a response to the bullied in the form of an apology and an offer to improve the relationship
- Attempt to discover whether there are underlying reasons for the behaviour.

It is important to feed back to all involved and informally keep a check on the situation. Usually, parents/carers do not need to be informed.

##### Medium level

The priority is to protect and provide support for the bullied, and then to try to resolve the conflict. In most cases the parents /carer should be informed.

You should also consider whether additional support work is needed with both bullied and bully, to help them address issues such as self-esteem, resilience, assertiveness, and anger management.

##### High level

In these circumstances, an organisation has to ensure the future safety of the bullied and other young people and to consider whether the organisation has the capacity to resolve the situation. This may mean sanctions, including temporary or permanent exclusion from the programme of learning and, if viewed as possibly a criminal offence, involve the police or children's social services.

The organisation will also need to consider whether the bullying has implications that go beyond the individuals involved. This is likely if the bullying is driven by prejudice, where it may be necessary to address the issues throughout the organisation.

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APPENDIX B: DISCRIMINATION, HARASSMENT OR BULLYING REPORTING FORM

<b>Name of person logging issue:</b>
<b>Date Raised:</b>
<b>Date Closed:</b>
<b>Outcome:</b>

<b>What happened/is happening?</b>
<b>When did it happen?</b>
<b>Who is doing the bullying/harassment? *</b>
<b>Has anyone else seen this happen and if so who? *</b>
<b>Was the bullying/harassment a one-off incident or part of a bigger problem?</b>
<b>Were you or anyone else hurt during the incident?</b>

**What sort of help would you like to stop the bullying / harassment?**

For example, would you like someone to speak to the individuals concerned, and / or to monitor the situation to make sure it doesn't happen again?

**How can we best support you while we investigate this issue?**

**Please note.** You don't have to give any information marked with an \* if you do not want to, but if you do give this information it will make it easier for us to help stop the bullying / harassment. Any information you do give us will be treated sensitively and we will discuss what action you would like us to take before we take any action.

**Please pass this form onto** your tutor , AEC or email to the Quality Manager at [swaller@gov2x.eu](mailto:swaller@gov2x.eu)

**Alternatively, you can complete the Discrimination, Harassment or Bullying Reporting Form on MSTeams.**

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