

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

TTT POLICY DOCUMENT

Anti-Bullying and Harassment Policy

Maintaining a respectful, inclusive and safe environment for every learner, staff member and associate.

Document Control

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Version	1.0
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Policy Owner	Phenil Mehta, Centre Manager
Approved By	Phenil Mehta, Centre Manager
Classification	Public
Applies To	All learners, staff, assessors, IQAs, associates and third parties

Anti-Bullying and Harassment Policy

1. Purpose

This policy sets out TTT's commitment to creating and maintaining a learning and working environment free from bullying, harassment, victimisation and intimidation. It defines unacceptable behaviour, the responsibilities of everyone at TTT and the routes available for reporting and resolving concerns.

2. Scope

This policy applies to:

- All learners enrolled on TTT qualifications or short courses
- All TTT staff, including Course Tutors, Course Assessors, IQAs and administrative staff
- Associates, freelance assessors and third parties involved in TTT provision
- All contexts of engagement, including virtual classrooms, discussion forums, email, written assessment communications, social media where connected to TTT and any face-to-face interactions
- Behaviour by a third party, such as a learner's employer or family member, that affects a TTT learner, staff member or associate

3. Definitions

The following terms carry the meanings given throughout this policy.

Bullying	Repeated, unreasonable behaviour directed at an individual or group that intimidates, degrades, undermines, humiliates, isolates or offends. Bullying does not need to relate to a protected characteristic to fall within this policy.
Harassment	Unwanted conduct related to a protected characteristic that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment (Equality Act 2010 s.26).
Sexual Harassment	Unwanted conduct of a sexual nature, including physical contact, suggestive comments, displaying explicit material or unwelcome advances, whether in person or online.
Cyberbullying	Bullying or harassment carried out through digital means, including email, chat, video conferencing, discussion forums, social media and messaging platforms.
Victimisation	Subjecting a person to a detriment because they have raised or supported another person in raising a concern under this policy or under the Equality Act 2010.

Third-Party Harassment	Harassment of a TTT learner, staff member or associate by a person who is not directly part of TTT, such as a learner's employer, family member or external contact.
Microaggression	A subtle, often unintentional comment or action that communicates a negative or derogatory attitude toward a person based on a protected characteristic or other personal attribute.
Reasonable Management	Legitimate, constructive feedback, performance management or direction given to a learner or staff member, which is not bullying even where the recipient finds it uncomfortable.

4. Policy Statement

TTT is committed to the following principles and commitments.

1. TTT has zero tolerance of bullying, harassment and victimisation in any form, whether online or offline, whether by or towards learners, staff, associates or third parties.
2. TTT promotes a culture of dignity, respect and open dialogue in every learning and working interaction.
3. TTT complies with the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023 preventative duty on sexual harassment, the Protection from Harassment Act 1997 and other relevant legislation.
4. All staff and associates are responsible for modelling respectful behaviour and challenging unacceptable conduct constructively.
5. Every concern raised under this policy is taken seriously, investigated promptly and handled with sensitivity and confidentiality.
6. Complainants and witnesses are protected from victimisation for raising concerns in good faith.
7. Malicious or knowingly false allegations are themselves a breach of this policy and will be investigated.
8. Confirmed breaches lead to proportionate action, which may include verbal or written warnings, mandatory training, suspension, termination of contract, removal from the programme or referral to the Police or Awarding Organisation where appropriate.
9. TTT takes reasonable steps to prevent sexual harassment of its workers, as required by the Worker Protection Act 2023.
10. This policy is reinforced through induction, annual training and regular communication.

5. Examples of Unacceptable Behaviour

The following examples are illustrative, not exhaustive. Whether behaviour amounts to bullying or harassment depends on its impact on the recipient as well as the intent of the person acting.

Category	Examples
Verbal	Insults, slurs, derogatory nicknames, mocking a person's appearance, accent or beliefs, shouting or persistent interruption in live sessions, offensive jokes even where framed as humour.
Written and digital	Abusive emails, intimidating chat messages, offensive memes or images shared in TTT channels, posting malicious content about another learner or staff member on social media.
Exclusion and isolation	Deliberately ignoring or excluding a learner from group work, withholding information needed for study, freezing someone out of discussion.
Intimidation	Threats, aggressive body language on camera, repeated and unwelcome contact, visible anger directed at an individual.
Discriminatory	Any of the above conduct connected to a protected characteristic, including racist, sexist, homophobic, transphobic, ableist or religiously motivated conduct.
Sexual	Unwelcome comments about a person's body or appearance, suggestive jokes or messages, requests for images, persistent unwanted attention, displaying explicit material during a session.
Abuse of power	Using a supervisory, tutor or assessor role to coerce a learner into action unrelated to study or to apply unjustified pressure on a staff member or associate.
Third-party conduct	A learner's employer demanding inappropriate access to that learner's study records or a family member contacting staff abusively on a learner's behalf.

6. What This Policy Does Not Cover

The following are not considered bullying or harassment under this policy, provided they are carried out reasonably, respectfully and without discrimination:

- Constructive feedback on assessment work or professional performance
- Reasonable management instruction, supervision, direction and performance conversations
- Robust academic debate where disagreement is expressed through respectful language
- Single episodes of rudeness or misunderstanding, which are addressed informally in the first instance

Where a learner or staff member is uncertain whether particular conduct falls within this policy, they are encouraged to discuss it with the Centre Manager on a confidential basis.

7. Roles and Responsibilities

Role	Responsibility
Centre Manager (Phenil Mehta)	Overall accountability for this policy; investigates formal complaints; determines sanctions; reviews this policy annually; ensures staff training is current.
Course Coordinator	First point of informal contact for learners; supports learners in raising concerns; monitors classroom and forum conduct.
Course Tutor	Models respectful behaviour; challenges unacceptable conduct in live sessions; refers concerns promptly; maintains a positive learning climate.
Course Assessor and IQA	Maintains professional conduct in all assessor-learner interactions; reports concerns arising from assessment exchanges.
All Staff and Associates	Comply with the Staff Code of Conduct; complete annual training; report bullying or harassment they experience or witness; cooperate with investigations.
Learners	Comply with the Learner Code of Conduct; treat fellow learners, staff and associates with respect; raise concerns through the routes in this policy; cooperate with investigations.

8. Prevention

TTT takes active steps to prevent bullying and harassment before it occurs.

- Codes of conduct for staff and learners are issued at induction and reinforced through ongoing communication
- Live sessions open with clear ground rules about respectful participation
- Moderation tools in virtual classrooms and discussion forums are configured and actively used
- All staff and associates complete annual training on bullying, harassment, sexual harassment and bystander intervention
- The Centre Manager assesses risks of harassment, including sexual harassment by third parties and records preventative measures in line with the Worker Protection Act 2023
- Feedback mechanisms allow learners and staff to raise concerns about culture before they escalate to formal complaints

9. Raising a Concern

Anyone experiencing or witnessing bullying or harassment is encouraged to raise it as soon as possible. Three routes are available.

9.1 Informal route

Where the recipient feels safe and able to do so, a direct, calm conversation with the other person can resolve many situations. Support in preparing for such a conversation is available from the

Course Coordinator or Centre Manager. Where the concern is resolved informally, a brief written note of the outcome is kept by the Course Coordinator.

9.2 Formal complaint

Formal complaints are submitted in writing to the Centre Manager at phenil@theteachertrainer.co.uk, setting out what happened, when, who was involved and any witnesses or supporting evidence. The Centre Manager:

1. Acknowledges receipt within 3 calendar days.
2. Opens an investigation, including interviews with the complainant, the respondent and any witnesses and a review of relevant evidence such as session recordings, chat logs or emails.
3. Issues a written outcome within 21 calendar days, with extensions communicated in writing where the complexity of the case requires it.
4. Records the investigation, decision and actions in the Bullying_Harrasment Log held by the Centre Manager.

9.3 Where the respondent is the Centre Manager

Where the complaint concerns the Centre Manager, it is referred instead to an independent reviewer such as an external HR consultant or the relevant Awarding Organisation, so the investigation is impartial.

9.4 External escalation

Where a complainant is not satisfied with the outcome of an internal investigation, they may escalate to the relevant Awarding Organisation, the Equality and Human Rights Commission, ACAS or, in the case of criminal behaviour, the Police. TTT cooperates fully with any external investigation.

9.5 Protection from victimisation

No learner, staff member or associate will be treated less favourably for raising a concern under this policy in good faith or for supporting another person who has raised a concern. Victimisation is itself a disciplinary matter.

10. Outcomes and Sanctions

Where a complaint is upheld, TTT takes proportionate action to address the behaviour, support the complainant and prevent recurrence. Possible outcomes include, but are not limited to:

Respondent Category	Possible Outcomes
Learner	Written apology; warning letter; mandatory behaviour coaching; restricted access to forums or live sessions; suspension; removal from the course; report to the sponsoring employer where applicable.
Staff or associate	Investigation under the Staff Disciplinary and Sanctions Policy; warnings; mandatory training; removal from specific duties; suspension; termination of contract.

Respondent Category	Possible Outcomes
Third party	Formal notification to the third party or their organisation; restriction of their involvement in TTT activity; in serious cases, referral to the Police.

Where behaviour may constitute a criminal offence, TTT will support the complainant in reporting to the Police and may make a report itself where appropriate.

11. Support for Those Affected

Being subject to bullying or harassment can significantly affect wellbeing, study and work. TTT provides the following support:

- Confidential one-to-one conversations with the Centre Manager
- Adjustments to learning or work arrangements to reduce contact with the respondent during an investigation
- Signposting to external support, including the Samaritans (116 123), the NHS 111 service and, in relevant cases, the Equality Advisory and Support Service (0808 800 0082)
- A post-outcome review meeting offered to the complainant to agree any ongoing support needed

12. Training

Role	Training	Frequency
All staff and associates	Bullying and harassment awareness; sexual harassment prevention; bystander intervention; respectful online conduct	Induction and annual refresh
Centre Manager	Investigating complaints; applying proportionate sanctions; Worker Protection Act duties	Induction and every two years
Course Tutors	Managing live session dynamics; de-escalation; addressing microaggressions	Annual
Course Assessors and IQAs	Professional boundaries in assessment interactions; recognising coercive conduct	Annual

13. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by legislative change, Awarding Organisation requirements, significant incidents or stakeholder feedback. Complaint data is reviewed quarterly for themes, patterns and opportunities to strengthen prevention. All outcomes are recorded in the Version History at Section 15.

14. Related Documents

This policy should be read alongside:

- Safeguarding and Prevent Duty Policy
- Equality, Diversity and Inclusion Policy
- Accessibility and Reasonable Adjustments Policy
- Staff Code of Conduct
- Learner Code of Conduct
- Complaints Policy
- Staff Disciplinary and Sanctions Policy
- Learner Sanctions Policy
- Whistleblowing Policy
- Online Learning and Digital Conduct Policy

15. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	A new standalone policy separating bullying and harassment from the previous combined EDI coverage. Aligns with Equality Act 2010, Worker Protection (Amendment of Equality Act 2010) Act 2023 and Protection from Harassment Act 1997.

16. Approval

This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta
Name

P Mehta
Signature

22/04/2026
Date