



## Anti Bullying, Harassment & Victimisation Policy

### Policy Statement

All KEITS learners and staff are entitled to be treated with dignity and respect at work and whilst learning. This means freedom from bullying and harassment, feeling safe and supported, and having access to redress if such behaviour does arise.

Bullying and harassment take many forms, but whatever form it takes, it is unlawful under the Equality Act 2010 and KEITS operates a zero-tolerance policy.

The law requires employers to take reasonable steps to prevent bullying, harassment or victimisation of learners and staff. We take action to prevent bullying and harassment from occurring and have clear reporting procedures for both learners and our staff to make a complaint about bullying or harassment. If, as a learner or member of staff, you have been bullied or harassed, or you have witnessed bullying or harassment, we encourage you to tell us so that we can deal with the matter swiftly.

### Definitions

- 1) Harassment is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.
- 2) Bullying may be characterised as offensive, intimidating, malicious, or insulting behaviour, an abuse or misuse of power, through means that undermine, humiliate, denigrate or injure the recipient.

Either or the above may be committed by a fellow worker, a contractor, or a third party. It does not need to occur in person. It can occur via digital means including social media sites or channels e.g. WhatsApp, Facebook, X etc. Someone may be harassed even if they were not the target of the behaviour. Examples of bullying or harassment include, but are not limited to:

- A) Verbal
- B) Cyber
- C) Emotional
- D) Homophobic
- E) Physical
- F) Racist
- G) Sexual (see separate Policy on Sexual Harassment for staff)
- H) Prejudice
- I) Ganging Up
- J) Misuse of Seniority

3) Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do an act which is protected under discrimination and harassment laws. It is not necessary for the person to have done the protected act in order for detrimental treatment to be considered as victimisation.

The protected acts are:

- making a claim or complaint under the Equality Act 2010 (for example, for discrimination or harassment)
- helping someone else to make a claim by giving evidence or information in connection with proceedings under the Equality Act 2010
- making an allegation that someone has breached the Equality Act 2010, or
- doing anything else in connection with the Equality Act 2010

Examples of victimisation may include:

- a) Failing to consider someone for promotion because they have previously made a bullying or harassment complaint
- b) Dismissing someone because they accompanied a colleague to a meeting about a bullying or harassment complaint
- c) Excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about bullying or harassment.

We are committed to ensuring that there is no sexual harassment or victimisation in our workplace. Allegations of sexual harassment are covered under our Sexual Harassment policy.

## **Policy Responsibility**

KEITS CEO has overall responsibility for the operation of this policy but may delegate elements of implementation or decision making to Designated Safeguarding Leads or Senior Management. Our managers and staff maintain an open-door policy. All learners, staff and contractors have a responsibility to behave in line with the requirements of this policy and to support learners or staff who may report bullying, harassment or victimisation.

Instances of bullying, harassment or victimisation perpetrated by members of KEITS staff or management may lead to disciplinary action including termination of employment. Such instances perpetrated by contractors, may lead to cessation of our business agreement with that individual.

Bullying or harassment perpetrated by our learner's employers or their staff, may lead to termination of their contract with KEITS. Serious cases of bullying, harassment or victimisation may result in law enforcement involvement.

## **Policy Key Features**

Raise awareness of KEITS zero-tolerance policy with all learners, learner's employers, our employees, contractors and any other parties who may interact with KEITS Ltd.

Ensure all learners and staff are aware of reporting procedures.

Deal quickly, discretely and sensitively with all reported incidents.

Regularly review preventative measures already in place.

## **Monitoring and Review**

This policy will be monitored by the Designated Safeguarding & Prevent Leads. If new legislation should be introduced the policy will be reviewed immediately.

Location	Title	Responsibility	Date Created	Version/updated	Review Date
Doc Con/Docs/ All Company Policies/Bullying, Harassment & Victimisation	Bullying, Harassment & Victimisation Policy	KH/KRS	March'18	4 – Oct'25	Oct'28