

## FEDERATION OF GORING AND STOKE ROW CHURCH OF ENGLAND PRIMARY SCHOOLS



# ANTI-BULLYING, HARASSMENT AND DISCRIMINATION POLICY

Policy reviewed and agreed by: Finance and Resources Committee  
Date: January 2026  
Next review: January 2028

This policy is applicable for Oxfordshire County Council (OCC) maintained schools. It is provided as advice for schools where the Governors are the employer. Academies may adapt this policy should they wish to.

This Oxfordshire model policy has been drawn up following consultation with the recognised trade unions and associations: ASCL, NEU, NAHT, NASUWT and Unison. Advice and support on the application of this policy is available from Educational Personnel Service (EPS) for maintained schools and HR.

### 1. PURPOSE

The Council and the School are committed to providing a safe, inclusive, healthy and productive working environment, free from harassment, bullying, victimisation and any behaviour that makes people feel excluded, offended, humiliated or intimidated. All staff should be treated with dignity and respect and be encouraged to meet their full potential.

This policy provides a framework for OCC maintained schools to help prevent bullying, harassment and discrimination and explains the procedure that should be followed by employees and the school leadership team when such incidents occur.

The Council and the School have a zero-tolerance approach to discrimination on the grounds of age, race, disability, sex, sexual orientation, gender identity, gender expression, religion or belief, marriage or civil partnership or pregnancy and maternity and expects all maintained schools, voluntary aided schools and academies to adopt a zero-tolerance approach to any form of discrimination.

Race means being part of a group of people who are identified by their nationality, citizenship, colour, national or ethnic origins.

A separate policy applies to bullying, harassment and discrimination that occurs from members of the public, clients or pupils as a result of an employee carrying out their role.

## 2. SCOPE

This policy applies to everyone working for the Council and School including all employees, supply teachers, casual staff, any workers classed as agency staff and consultants, whether working from Council premises, School premises or from other locations. It also covers work-related events or social functions.

### 2.1 Employee responsibilities

Every employee and worker must:

- uphold the Council's and School's values
- treat colleagues, Councillors, pupils and partners with dignity and respect
- be aware of the effect their behaviour can have on others
- create a work environment where bullying, harassment and discrimination are not tolerated
- support colleagues if they experience bullying, harassment or singling out
- dress appropriately for the workplace
- challenge inappropriate behaviour or speak to a manager, Headteacher, Governing Body, EPS or union representative
- set a positive example
- be mindful of language and attitude
- co-operate with investigations
- keep their equality and diversity knowledge up to date
- inform their manager if they suspect unfair discrimination, harassment or victimisation

### 2.2 Policy Breach

The Council and School have a zero-tolerance policy towards bullying, harassment and discrimination. Where such behaviour is found to have taken place, disciplinary action will be taken, which may include dismissal or termination of contract.

All complaints must be taken seriously and handled sensitively. Anyone found to have made a deliberately false or malicious allegation will be subject to disciplinary action.

## 3. THE LAW AND DEFINITIONS OF BULLYING, HARASSMENT AND DISCRIMINATION

Bullying and harassment cover a range of behaviours that undermine dignity. The Council, School and individual employees can be held liable for unlawful discrimination, harassment or bullying.

**Bullying** is: "Offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient." (ACAS)

**Harassment** is: "Unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment." (Equality Act 2010)

Harassment may relate to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. It may be verbal, non-verbal or physical.

There is also protection against harassment related to trade union membership or non-membership.

**Discrimination** is: "Treating a person unfairly because of who they are or because they possess certain characteristics."

The nine protected characteristics are: age, disability, race, religion & belief, gender reassignment, sex, sexual orientation, pregnancy and maternity, marriage and civil partnership.

Victimisation occurs when someone is treated detrimentally because they have raised or supported a complaint under the Equality Act.

#### **4. BEHAVIOURS THAT COULD BE REGARDED AS BULLYING, HARASSMENT OR DISCRIMINATION**

These behaviours may be verbal, written, physical or digital (e.g., email, messaging, social media). They may be single or repeated incidents.

##### **4.1 Examples of unacceptable behaviour**

- personal insults
- physical aggression or intimidation
- practical jokes that embarrass or humiliate
- degrading jokes, verbal abuse, offensive comments
- racist comments or threats
- homophobic, biphobic or transphobic insults
- outing someone as LGBT+ without consent
- gossip or speculation about sexual orientation or gender identity
- unnecessary or degrading references to protected characteristics
- refusing to use correct pronouns
- intrusion into privacy
- deliberate isolation or exclusion
- sexual advances or inappropriate physical contact
- stalking or pestering
- bullying or victimising someone based on trade union membership

#### **5. SCHOOL'S RESPONSIBILITIES**

The school leadership team must model appropriate behaviour, encourage an inclusive atmosphere, prevent harassment and act promptly when issues arise.

They must:

- provide a good example
- be alert to potential issues
- attend equality and diversity training
- correct inappropriate behaviour
- ensure all staff understand expected standards
- ensure all staff undertake equality and inclusion training
- record incidents and outcomes
- treat cases sensitively and confidentially

##### **5.1 Legitimate Management Actions**

Managers may:

- issue instructions
- set targets and monitor performance
- set standards and monitor compliance
- address unacceptable performance or behaviour

These actions do not constitute bullying when carried out fairly.

## **5.2 Unacceptable Behaviour by Managers**

Examples include:

- humiliating staff publicly
- unjustified criticism
- intimidation or threats
- excessive or unrealistic demands
- assigning inappropriate tasks
- undermining staff
- blocking progression
- making unfounded threats about job security
- disclosing personal information without consent
- discriminatory task assignment
- unconscious bias leading to unreasonable conditions

## **6. RAISING A CONCERN**

### **6.1 Informal approach**

Employees should, where possible, speak directly to the individual or seek support from a manager, HR, EPS or a union representative. Keeping a diary of incidents may help.

If the concern relates to the manager or Headteacher, it should be raised with the Chair of Governors or via a union representative.

### **6.2 Mediation**

A trained mediator may help resolve issues and restore working relationships.

## **7. FORMAL APPROACH**

If informal steps fail or the issue is serious, employees may raise a formal grievance. The grievance form should indicate whether the complaint relates to bullying, harassment or discrimination.

If the complaint concerns the line manager, the form should be submitted to EPS or a union representative.

## **8. CONFIDENTIALITY**

Complaints must be handled confidentially. No-one will be victimised for making or being subject to a complaint. Breaches of confidentiality may lead to disciplinary action.

## **9. BULLYING, HARASSMENT OR DISCRIMINATION BY MEMBERS OF THE PUBLIC**

Employees must report incidents immediately. All incidents will be investigated in line with the Council's Zero Tolerance policy.

## 10. TRADE UNION OFFICIALS

Concerns should be raised with the local branch and HR.

## 11. GOVERNORS

Concerns should be raised with the line manager and HR Business Partner for Children's Services.

## 12. SUPPORT FOR EMPLOYEES

Support is available through the Employee Assistance Programme and trade unions.

### 12.1 Other sources of information

- ACAS – [www.acas.org.uk](http://www.acas.org.uk)
- Equal Opportunities Commission – <https://www.eoc.org.uk/>
- Equality and Human Rights Commission – [www.equalityhumanrights.com](http://www.equalityhumanrights.com)
- Stonewall – [www.stonewall.org.uk](http://www.stonewall.org.uk)

## 13. EQUALITY MONITORING AND ACCESSIBILITY

The Council monitors complaints to ensure fairness and consistency. Adjustments can be made for disability or language needs.

### Equality & Diversity Impact Measure

This policy has been subject to an Equality Impact Assessment and is not considered to unduly impact any protected group.

### Variation of Procedures

This procedure is not contractual and may be varied to comply with legislation or best practice.

### Version Control

- **Approved:** November 2021 (Version 1.0)
- **Review due:** November 2023 (unless legislative change requires earlier review)

## Annex A – Definitions of Unlawful Discrimination

**Direct discrimination** Treating someone less favourably because of a protected characteristic.

Includes:

- discrimination by perception
- associative discrimination

**Indirect discrimination** A rule or practice that disadvantages people with a protected characteristic unless objectively justified.

**Positive action** Permitted steps to improve opportunities for under-represented groups. Positive discrimination is unlawful.