

Anti-Bullying and Harassment Policy

Introduction and Purpose

InterAct is committed to providing a safe, respectful, inclusive, and supportive environment for all staff, volunteers, trustees, service users, learners, families, visitors, contractors, and others engaged with the charity.

InterAct believes that everyone has the right to:

- be treated with dignity and respect;
- feel safe and valued;
- participate without fear of bullying, harassment, discrimination, intimidation, victimisation, or abuse; and
- work, volunteer, learn, and access services within environments that promote wellbeing, equality, inclusion, and positive relationships.

Bullying, harassment, discrimination, victimisation, intimidation, and abusive behaviour are unacceptable and will not be tolerated.

InterAct recognises that bullying and harassment can:

- cause significant emotional distress and harm;
- negatively affect mental health, confidence, wellbeing, and safety;
- undermine safeguarding arrangements;
- damage professional relationships and trust;
- create hostile or unsafe environments; and
- expose individuals and the charity to legal, safeguarding, and reputational risks.

InterAct also recognises its legal duty to take reasonable steps to prevent sexual harassment and to promote safe, respectful, and inclusive environments through:

- clear standards of behaviour;
- policies and procedures;
- training and awareness;
- supervision and management oversight;
- risk assessment;
- safeguarding arrangements; and
- prompt action where concerns arise

InterAct will take reasonable steps to prevent harassment, bullying, discrimination and victimisation by service users, parents, carers, contractors, suppliers, visitors and any other third parties interacting with the charity

Scope

This policy applies to all who work for or on behalf of InterAct and to all InterAct stakeholders, including children, young people, their parents and carers, suppliers, etc.

Definitions

Bullying may be described as offensive, intimidating, malicious, insulting, or abusive behaviour that is intended to undermine, humiliate, intimidate, denigrate, isolate, or injure another person.

Bullying may:

- be deliberate or reckless;
- involve repeated behaviour or a serious one-off incident;
- occur face-to-face or online;
- involve an abuse of power or position; or
- involve individuals or groups.

Harassment is unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Harassment may relate to:

- age;
- disability;
- sex;
- gender reassignment;
- race;
- ethnicity;
- religion or belief;
- sexual orientation;
- pregnancy or maternity;
- marriage or civil partnership

InterAct may also take action regarding other forms of inappropriate behaviour not covered by the Equality Act.

Harassment may be:

- verbal;
- non-verbal;
- written;
- physical;
- sexual;
- psychological; or
- online.

Sexual harassment includes unwanted behaviour of a sexual nature that:

- violates an individual's dignity; or
- creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Sexual harassment may include:

- sexual comments or jokes;
- inappropriate touching;
- intrusive questions;
- sexualised remarks;
- sharing sexual images or content;
- unwanted messages;
- sexual gestures;
- online harassment;
- repeated unwanted attention; or
- behaviour that makes another person feel unsafe, intimidated, or humiliated.

Victimisation occurs when an individual is treated unfairly because they have:

- raised a concern or complaint;
- supported another individual raising concerns;
- participated in an investigation; or
- challenged bullying, harassment, discrimination, or unsafe behaviour.

Cyberbullying or online harassment includes bullying, intimidation, harassment, humiliation, or abusive behaviour carried out through:

- social media;
- messaging platforms;
- email;
- online forums;
- gaming platforms;
- livestreaming platforms; or
- other digital communication methods.

This may include:

- abusive messages;
- fake accounts;
- sharing edited or manipulated images;
- AI-generated abusive content or deepfakes;
- public humiliation;
- exclusion;
- threats;
- spreading rumours; or
- sharing confidential or private information.

Legal and Regulatory Requirements

This policy has been developed with reference to:

- Equality Act 2010;
- Worker Protection (Amendment of Equality Act 2010) Act 2023;
- Protection from Harassment Act 1997;
- Health and Safety at Work etc. Act 1974;
- Human Rights Act 1998;
- Safeguarding Vulnerable Groups Act 2006;
- Data Protection Act 2018 and UK GDPR;
- Working Together to Safeguard Children;
- Keeping Children Safe in Education 2025 best practice principles;
- Charity Commission safeguarding and governance guidance; and
- other relevant safeguarding, employment, equality, and legal requirements.

InterAct recognises that bullying, harassment, discrimination, victimisation, and abusive behaviour may:

- constitute safeguarding concerns;
- breach equality legislation;
- result in disciplinary action;
- result in exclusion from services or activities;
- expose individuals to personal liability; or
- require referral to external agencies.

Roles and Responsibilities

Board of Trustees

The Board of Trustees is responsible for:

- promoting a respectful and inclusive organisational culture;
- ensuring appropriate policies and procedures are in place;
- maintaining oversight of significant concerns, risks, or patterns;
- supporting safeguarding and equality arrangements; and
- ensuring the charity meets its legal and regulatory responsibilities.

Chief Executive Officer (CEO)

The CEO is responsible for:

- overseeing implementation of this policy;
- promoting safe, respectful, and inclusive environments;
- ensuring concerns are managed appropriately;
- supporting fair and proportionate investigations;
- ensuring safeguarding concerns are escalated appropriately;
- ensuring staff and volunteers understand expected standards of behaviour; and
- ensuring appropriate action is taken where concerns are substantiated.

Managers

Managers are responsible for:

- promoting positive behaviour and professional standards;
- supporting staff, volunteers, and service users;
- responding appropriately to concerns or complaints;
- ensuring concerns are investigated promptly and fairly;
- supporting safeguarding arrangements;
- monitoring patterns, themes, or repeated concerns; and
- ensuring learning and improvement where concerns arise.

Staff and Volunteers

All staff and volunteers are responsible for:

- treating others with dignity and respect;
- maintaining professional and appropriate behaviour;
- challenging inappropriate behaviour where safe to do so;
- reporting concerns promptly;
- supporting inclusive and respectful environments;
- complying with safeguarding and equality expectations; and

- cooperating with investigations where required.

Policy

Preventing Bullying and Harassment

At InterAct, we are dedicated to creating a culture built on respect, inclusivity, and wellbeing.

Our approach includes:

- maintaining clear policies, procedures, behavioural expectations, and codes of conduct;
- communicating expected standards of behaviour to staff, volunteers, service users and their families, and others engaged with the charity;
- ensuring staff and volunteers understand safeguarding, equality, professional boundaries, and behavioural expectations;
- assessing and managing risks relating to bullying, harassment, discrimination, safeguarding, online behaviour, lone working, activities, environments, relationships, and communication arrangements where appropriate;
- encouraging staff and volunteers to challenge inappropriate behaviour promptly and proportionately, even where a formal complaint has not been made;
- promoting environments where concerns can be raised safely and without fear of victimisation;
- supporting early intervention where concerns or tensions arise;
- promoting online safety and respectful online behaviour;
- maintaining appropriate supervision, support, and training arrangements; and
- responding appropriately to concerns, complaints, or incidents.

Reasonable management instructions, supervision, performance management, constructive feedback, disciplinary processes, capability procedures and legitimate operational decisions do not constitute bullying where conducted fairly, respectfully and reasonably.

Communication of Expectations and Positive Behaviour

InterAct recognises the importance of creating environments where expectations relating to behaviour (including bullying and harassment) are clearly communicated, understood, and consistently reinforced.

InterAct also recognises that some children, young people, their parents/carers, or other stakeholders may have learning disabilities or cognitive differences and require additional support to understand, remember, or apply behavioural expectations consistently.

For this reason, InterAct recognises that positive behaviour support should not rely solely on written rules or sanctions. Expectations should also be communicated through:

- positive role modelling;
- consistent behaviour from staff and volunteers;
- clear and accessible communication;
- reminders and reinforcement;
- supportive conversations;

- encouragement and praise;
- visual or simplified communication where appropriate; and
- trauma-informed and relationship-based approaches.

Staff Training

InterAct recognises that maintaining safe, respectful, inclusive, and supportive environments depends upon staff, volunteers, and trustees understanding:

- acceptable standards of behaviour;
- safeguarding responsibilities;
- equality and inclusion expectations;
- professional boundaries; and
- how to recognise, prevent, challenge, and respond to bullying, harassment, discrimination, victimisation, and sexual harassment.

Training may be delivered through:

- induction;
- team meetings;
- supervision;
- policy updates;
- safeguarding briefings;
- reflective discussions;
- online learning; and
- formal training sessions where appropriate.

Complaining With Support or on Behalf of Another Person

InterAct recognises that some individuals may require support to raise concerns or make complaints.

Complaints may therefore be made:

- with the support of another person; or
- on behalf of another individual, where appropriate.

This may include support from:

- a parent or carer;
- advocate;
- support worker;
- family member;
- trusted adult; or
- another appropriate representative.

Where a complaint is made on behalf of another person, InterAct may seek to:

- confirm that the individual is aware of and, where appropriate, consents to the complaint;
- ensure the representative is acting appropriately and in the individual's best interests; and

- communicate in ways that are accessible, supportive, and appropriate to the individual's needs.

InterAct will seek to ensure that individuals are not disadvantaged or treated unfairly because they require support to raise concerns or complaints.

Malicious or Vexatious Complaints

InterAct recognises that most complaints are raised genuinely and in good faith and should be treated seriously, respectfully, and fairly.

However, in rare circumstances, a complaint may be considered malicious or vexatious where there is evidence that it has been made:

- deliberately to cause harm, distress, disruption, or reputational damage;
- knowing the information provided is false;
- abusively, persistently, or unreasonably;
- without reasonable grounds; or
- in a manner intended to harass, intimidate, or victimise others.

InterAct will consider concerns carefully and fairly before deciding whether a complaint may be malicious or vexatious. Complaints will only be treated as malicious where there is evidence they were knowingly false or made in bad faith.

Where concerns arise regarding unreasonable, abusive, or malicious behaviour, InterAct may:

- place reasonable boundaries on communication;
- restrict inappropriate contact methods;
- manage communication through a nominated individual;
- refuse to respond to abusive or threatening behaviour; or
- take further action where behaviour creates safeguarding, wellbeing, legal, or reputational concerns.

Any action taken will be proportionate, fair, and appropriately recorded.

Complaining About Bullying and Harassment Procedure

Stage 1: Informal Resolution

In many cases, an informal approach can resolve the issue quickly, particularly if the perpetrator is unaware that their behaviour is offensive.

- The complainant may ask the person responsible to stop the behaviour, either verbally or in writing.
- The complainant may ask a trusted colleague or manager to speak to the person responsible on their behalf.

In some cases, an informal mediation session may also be useful, particularly for low-level, first-time incidents where both parties consent, where there is no safeguarding concern, and the complainant feels safe.

Stage 2: Formal Complaint

If the informal approach is inappropriate, has failed, or if the case is serious, a formal complaint should be made.

Non-staff members (service users, their parents/carers, visitors, etc.) may either:

- Raise the matter directly with the relevant Service Manager or our CEO
- Submit a formal complaint via our Comments, Compliments and Complaints Policy.

Staff and volunteers may either:

- Raise the matter directly with their line manager, another manager or the CEO
- Submit a formal complaint via our Grievance Policy

In all cases:

- Complaints will be appropriately documented and retained
- Complaints will be acknowledged within a reasonable timeframe and investigations will be commenced and completed without unreasonable delay.
- Complaints will be taken seriously.
- No person will suffer detriment for acting as a witness or providing evidence
- Any individual subject to allegations will be informed of the allegations and given a reasonable opportunity to respond before findings are reached
- Serious complaints will be escalated to the Board of Trustees.
- Complaints will be thoroughly investigated. (Interim safety measures may be put in place while the investigation is ongoing.)
- Outcomes will be decided on the balance of probabilities, taking into account all available evidence and the harm that has occurred.

Reporting Crimes to the Police

If a crime has been committed, we will always ask the victim or the person making the complaint to report the matter to the police.

If they do not want to report the crime, we will try to respect their wishes. However, in some circumstances, we may report the matter even without their consent. For example, if there is an ongoing risk to the person's safety or the safety of others.

If we need to do this, we will:

- Tell the victim/person who made the complaint first.
- Let them know once you've reported it to the police.

Supporting Victims and Others Affected

InterAct is committed to providing appropriate support not only to the victim of bullying or harassment but also to anyone else who may be affected by the incident or subsequent investigation.

Support may include, but is not limited to:

- Taking immediate, practical steps to prevent further distress.
- Offering confidential debriefing sessions where those affected can talk through what happened and let us know how we can best support them.
- Signposting to or providing those affected with access to external support resources to help them cope with the stress and trauma of the situation.

Confidentiality will be respected where possible, but no person will be prevented from reporting unlawful discrimination, harassment, safeguarding concerns or criminal conduct to appropriate authorities.

Victimisation

All complainants will be protected from victimisation for raising a complaint or assisting in an investigation relating to bullying and/or harassment.

Retaliation against any individual who has raised a complaint about or assisted in an investigation of bullying or harassment will be regarded as a serious disciplinary offence/breach of our standards and will be dealt with accordingly.

Non-Compliance

Breaches of this policy may:

- create safeguarding risks;
- expose individuals or the charity to legal or reputational concerns;
- undermine wellbeing and inclusion; and
- result in disciplinary action or other appropriate action.

Serious breaches may result in:

- safeguarding referrals;
- exclusion from services or activities;
- referral to external agencies;

- disciplinary action; or
- termination of employment or volunteering arrangements where appropriate.

Monitoring and Review

InterAct will monitor concerns, complaints, incidents, and behavioural patterns in order to:

- identify themes or recurring concerns;
- improve organisational culture;
- support safeguarding;
- reduce future risks;
- improve staff and service user wellbeing; and
- strengthen equality and inclusion.

Monitoring may include:

- complaints and incident records;
- safeguarding reporting;
- supervision discussions;
- feedback from staff, volunteers, and service users;
- observation and quality assurance processes;
- behavioural trends;
- staff retention and exit feedback; and
- lessons learned following incidents or investigations.

This policy will be reviewed at least annually, or sooner where:

- legislation or guidance changes;
- concerns or incidents indicate improvements are required;
- safeguarding expectations change; or
- organisational arrangements change.

Version Control

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Policy Owner/Contact Email:

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Change history

Version 1 [Sept 2023] Initial issue

Version 2 [26/05/26] Retemplated and updated to include new measures to prevent harassment and sexual harassment.

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Approved By: Vickie Perkins (CEO) and Sonal Patel (Trustee)