



Anti-Bullying & Anti-Harassment Policy

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1. Background and Scope

LCK Academy (LCKA) is committed to ensuring that all students, staff and other stakeholders at LCKA feel secure and are not subjected to any form of bullying or harassment when studying or working at one of the LCKA locations or when representing LCKA in any other location.

'Staff' includes all individuals engaged in work at LCK Academy, including full-time, part-time, temporary, agency, and freelance workers. LCKA recognises that bullying and harassment can significantly affect the working and social environment of students and staff, and we will make every effort to prevent bullying and harassment of anyone by anyone and to address instances promptly should they arise.

Bullying and harassment are universally treated by LCKA as unacceptable and will not be tolerated. This policy and its procedures seek to provide a means for protecting the rights of individuals regarding their personal safety and dignity.

Bullying and harassment may be unlawful in many cases and individuals may be reported to the authorities if it is believed that their behaviour is illegal. Many instances of bullying and harassment are related to discrimination. LCKA is committed to equality, diversity and inclusion, which includes eradicating all types of discrimination including those based on the following criteria listed as protected characteristics in the Equality Act 2010:

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

It is the right of every staff member and student to work or study without fear of harassment, victimisation or bullying. LCKA recognises the issues linked to harassment and bullying and is dedicated to creating an environment where everyone can perform effectively, confidently, and competently. Any complaints raised about bullying and harassment will be taken seriously, promptly investigated, and appropriate action will be taken if evidence of bullying and harassment have been identified.

This policy is applicable to all incidents of bullying and harassment that involves any member of staff, any student or other stakeholders visiting or representing LCKA.

2. Aims and Objectives

This policy aims to provide every student, staff member, and stakeholder with the comprehensive information they need to understand if bullying and harassment have occurred and what actions they can take if they or someone else they know requires protection from bullying and discrimination. It also explains what actions LCKA can and will take if any individual or group are collectively engaged in bullying or harassing another person at an LCKA Campus or while representing the Academy at any alternative location. This policy has the following objectives:

- To ensure that all students, staff and stakeholders collectively share the responsibility for cultivating a secure, tolerant and compassionate learning and social environment that remains free from bullying, threats, harassment, and intimidation.
- To provide anyone who initiates or reports an allegation of bullying or harassment with comprehensive assistance and support, so they do not feel vulnerable or at risk of potential repercussions.
- To provide additional support and clarification to our existing policy on safeguarding adults at risk, who potentially could be victims of bullying and harassment.
- To assist everyone in recognising different types of bullying and harassment and to establish a process that LCKA can utilise to address any cases fairly, safely and effectively
- To ensure the roles of individual staff designated to manage cases or allegations of bullying or harassment are clear.
- To provide comprehensive information on required documentation and record-keeping if an allegation is reported.

3. Defining Terms

According to [UNISON](#), **bullying** is:

- offensive, intimidating, malicious, or insulting behaviour;
- abuse of authority which violates the dignity of an individual or a group of people;
- creating a hostile environment against an individual.
- the undermining, humiliation or injury of an individual.

Bullying may or may not relate to one of the protected characteristics from the Equality Act 2010 listed above.

According to [UNISON](#), **harassment** is:

Unwanted conduct that has the purpose or effect of violating the dignity of people in the workplace or of creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment includes bullying if it relates to one of the protected characteristics above.

Any cases or allegations of sexual harassment are covered under the LCKA **Sexual Harassment Policy** and are not, therefore, included in this policy. For the purposes of this policy, bullying and/or harassment includes all forms of unacceptable behaviour as defined by UNISON above, which is conducted by students, staff or other stakeholders towards any other student, staff member or stakeholder.

3.1. Types of Bullying and Harassment

The following list includes examples of bullying and harassment (apart from sexual harassment covered by the LCKA Sexual Harassment Policy) which may occur, but it is not exhaustive:

- Making arguments with others without due cause.
- Being physically violent
- Being intentionally rude or offensive to others
- Direct threatening physical, verbal, non-verbal behaviour.
- Assigning students or staff an unacceptably excessive workload so they are unable to cope.
- Disregarding someone's contributions and excluding them from activities, events or access to important information they should reasonably expect to have access to.
- Treating someone inequitably compared to the way in which you treat others.
- Persistently taunting or mocking someone to the extent that they are made to feel uncomfortable or belittled.
- Denying someone access to possible support services, as well as training and development opportunities.
- Humiliating, threatening and offending or slandering people on social media, including online-bullying using social media, texting, images and video.
- Making discriminatory remarks about someone.
- Initiating or propagating rumours about other people with malicious intentions.

3.2. Freedom of Speech and Academic Freedom

Whilst preventing all forms of bullying and harassments, LCK Academy is committed to upholding lawful freedom of speech and academic freedom, as outlined in the Education (No. 2) Act 1986 and OfS Condition E6.

Nothing in this policy should be used to prohibit lawful expression of opinions or academic debate, even if some opinions may be considered offensive by some people, provided it does not meet the threshold for bullying, harassment or incitement to violence as defined above.

Please see the LCKA's [Academic Freedom](#) and [Freedom of Speech](#) Policies for further information.

4. Application

Students and staff have different routes for addressing bullying or harassment, ranging from directly requesting the offender to cease, emailing safeguarding.prevent@lckacademy.org.uk, or formally **reporting** a safeguarding concern via [Report a Safeguarding Concern](#). Students should avoid using the Complaints Policy or Complaints Form for cases of bullying or harassment including sexual harassment. This is to ensure that the case is managed as quickly as possible and is not included with more general complaints. Staff should also use the [Report a Safeguarding Concern](#), rather than the procedures in the Staff Grievance Policy, which is in the Staff Handbook.

4.1. Informal Early Resolution

In the initial stage when an allegation of bullying or harassment emerges, the involved parties should attempt to resolve the matter through informal means if feasible. This approach is only recommended where no immediate risk exists from physical, verbal or mental abuse.

Keeping records

Students, staff members, or other stakeholders who believe that they are experiencing bullying or harassment, should record all relevant incidents in writing, documenting times, dates, witness names, and additional pertinent information. They should do this even if they hope to resolve the matter informally.

Talk to the person causing you distress

Where possible and safe, the alleged victim of bullying should communicate to the perpetrator that their conduct is unacceptable and ask them to stop. It may be that the person is unaware that their actions are inappropriate. If the inappropriate behaviour is unintentional, it may be enough to simply ask the person to stop.

Talk to someone else

Should a **student** feel unsafe or uncomfortable confronting an individual directly, or if previous attempts have proven ineffective, they might discuss the situation with a friend, their **Lecturer**, or the **Head of Student Services**.

Similarly, if a **staff member** feels unsafe or uncomfortable confronting an individual directly, or if previous attempts have proven ineffective, they might discuss the situation with their **line manager**, or the **Head of HR**.

If a student or staff member prefers discussing the matter with someone sharing similar background characteristics (e.g., gender, race, religious belief), LCKA will make efforts to accommodate such preferences when feasible.

Anyone reporting bullying or harassment will be offered appropriate support, counselling, or mentoring and will be requested to complete the **Pre-Counselling Declaration** (Appendix 1A and 1B).

Informal meeting

An alleged victim may request an informal meeting with the LCKA staff concerned. They have the option to bring a companion to the meeting for support or representation. Substantial efforts will be directed towards achieving an amicable, informal resolution.

Responding to a concern

All allegations of bullying or harassment by students and staff will be swiftly addressed, commencing with an informal early resolution whenever possible. This method typically produces effective outcomes while minimising embarrassment and preserving confidentiality. If the student or staff member making the allegations prefers to bypass the informal early resolution stage and make a formal complaint directly, they can by following the procedure below.

4.2. Confidentiality

Claims of bullying and harassment may be extremely sensitive so Academy staff will act with the utmost discretion so as to protect the privacy of those involved. Throughout any proceedings, the Academy will apply its Data Protection Policy and Data Privacy Notice and Consent Policy and comply with the UK's general data protection regulations (UK GDPR) and Data Protection Act 2018.

Information we disclose

The Academy will only share information connected with a case with the express permission of the parties involved, although exceptions may be made where LCKA needs to:

- Report a crime.
- Prevent a crime from taking place.
- Safeguard students, staff or any other stakeholder from harm.

In accordance with LCKA's Data Privacy Notice and Consent Policy and Data Protection Policy, disclosure of information will be restricted to relevant information only and will only be provided to those who are legally entitled to receive such information and for justifiable reasons.

Anonymous reporting

LCKA permits anonymous reporting through its online safeguarding portal [Report a Safeguarding Concern](#). While this may limit the ability to investigate fully, all reports will be reviewed and actioned where possible. Anonymised cases of bullying and harassment will be presented annually to the Board of Governors to review trends, effectiveness of response, and improvement opportunities.

4.3. Safety Concerns

In situations where personal safety is compromised, students or staff members should not approach the person they are concerned about but notify someone. **Students** may talk to their Lecturer or Head of Programme or any other member of staff they feel comfortable approaching. **Staff** should talk to their **line manager**, the **Head of HR** or other senior member of staff.

Students and staff can also use the online form to [Report a Safeguarding Concern](#).

Anyone connected with LCKA who reports serious cases of bullying or harassment including sexual harassment will be offered support by the Wellbeing Officer and will be signposted to relevant specialist services where appropriate. Refer to the LCKA **Sexual Harassment Policy** for more information on how this type of serious harassment is dealt with at LKCA.

If concerns about anyone's personal safety arise, contact the police (999 for emergencies and 101 for non-emergencies) and immediately inform a senior member of staff.

4.4. Formal Procedure

The Informal Procedure described above may fail to achieve an early resolution, or someone may feel unsafe or uncomfortable and unable to speak to the person they feel is bullying or harassing them. In this case, the alleged victim of bullying or harassment may report an allegation of bullying or harassment using the online safeguarding portal: [Report a Safeguarding Concern](#).

Alternatively, a relative, friend, or representative (such as a Student Council member, colleague or external agency) may submit the report on behalf of the member of staff or student, provided they have the consent of the person they are representing. This consent must be confirmed by the person they are representing in an email to safeguarding.prevent@lckacademy.org.uk.

Reporting an allegation

When reporting an online allegation of bullying or harassment, you need to give the following information:

- the name of the alleged harasser(s) or bully(ies)
- specifics of the harassment or bullying
- incident dates and times
- witness names if any
- any prior actions taken to address the issue.

Risks to health and safety

If the bullying or harassment is deemed a risk to someone's safety or health, a staff member might make immediate contact with the person reporting the allegation on the same day and refer them to the Safeguarding Officer, Designated Safeguarding Lead and/or Wellbeing Officer to conduct a separate assessment and ensure they are safe and receive the support they need.

Responding to an online report

Once a student or member of staff has reported an allegation of bullying or harassment formally online, the individual will be notified **within two days** that the members of the LCKA Disciplinary Panel (DP) will appoint an appropriate Investigating Officer (IO), who will be designated to handle the case.

4.5. Disciplinary Panel (DP)

Allegations that cannot be successfully resolved or are deemed too serious for Informal Early Resolution as described above, will be referred to a Disciplinary Panel (DP) comprising of the following members:

- Director of Advancement and Operations (Chair)
- Head of HR (Vice-Chair)
- Designated Safeguarding Lead

The DP provides a comprehensive report to the Senior Leadership Team (SLT) on the investigation and outcome whenever it has been summoned to evaluate an allegation of bullying or harassment.

Where an allegation is made against a member of the DP the SLT will ask that member to recuse themselves from the DP. The SLT will appoint a suitable alternate not involved in the case to take the place of the member recused from the DP.

4.6. Investigation Officer (IO)

The DP will designate an appropriate Investigating Officer (IO) who is unaffiliated with the alleged victim or the alleged bully/harasser. The IO must also be free from any actual or perceived conflict of interest and positioned to ensure an impartial and objective investigation. The IO will:

- Contact the alleged victim **within two days**, evaluate the severity of the allegation and guide the individual on the next steps they will take.
- Explore all potential options including following informal procedures with the individual and any representative they may have before following the formal procedure below.

4.7. Recommended Investigating Officers

Accused of bullying/harassment	Recommended Investigating Officer/s
Chief Executive Officer	An independent member of the BoG
Executive Dean	Chief Executive Officer
Senior Staff	Chief Executive Officer
Professional Staff	The Executive Dean
Junior Staff	Head of HR
Students	Designated Safeguarding Lead

4.8. Investigation

Within five days after contacting the alleged victim, the IO will compile reports and collect written statements from the alleged victim and the alleged bully(ies) or harasser(s). Both parties must be informed that they are required to maintain confidentiality regarding the allegation and refrain from contacting the other party's witnesses. Any breach may be interpreted as an attempt to intimidate witnesses and could potentially result in disciplinary action. Both parties must also be informed that potential motivation for fabricating evidence will be considered by the IO.

Written statements

Both parties may submit a written statement. These are made available to all parties involved and include the following:

- The date, time, and location of each incident.
- Observations, and other pertinent details.
- Any other corroborating evidence.
- Any witness who can testify to the allegation or denial of the allegation.

4.9. Investigative Meeting

The Investigating Officer (IO) will conduct **separate meetings** with both parties, along with their respective representatives if relevant. Representatives could be a friend, family member, peer or colleague.

The Investigating Officer will evaluate any requests for **confidentiality** but the accused must be informed who is making an allegation against them so that they can mount a defence. The IO will carefully balance protecting witness identities and ensuring a fair hearing. Both parties should receive an opportunity to nominate witnesses they wish to be interviewed.

Outcome of the investigation

Following the investigation, the IO will compile a report. Both parties, along with the members of the Disciplinary Panel, will receive the report **within five days**. The Disciplinary Panel will read the report and decide one of the following:

- There needs to be a Disciplinary Hearing
- There does not need to be a Disciplinary Hearing

The IO will inform both parties of the outcome **within five days**.

Responding to the outcome

Despite its initial ruling, the DP will be obliged to hold a hearing if the alleged victim still requests one.

Protections

The alleged victim should never face a penalty such as suspension for making an allegation. If relocation is necessary to prevent bullying, the alleged victim should not be moved unless they opt to do so. However, allegation that are deemed malicious may lead to staff or student disciplinary proceedings. See the Staff Disciplinary Policy in the Staff Handbook and the Non-Academic Student Disciplinary Policy for more information.

4.10. The Disciplinary Hearing

Certain witnesses might be hesitant to attend a disciplinary hearing, due to embarrassment or fear of potential reprisal. All staff and students should be aware that LCKA strictly prohibits any form of intimidation, victimisation, or discrimination against those who assist in the investigation of allegations of bullying or harassment. Retaliating against an alleged victim or a witness who has assisted in this procedure is considered a serious disciplinary offence.

If the alleged victim and the alleged bully(ies) or harasser(s) are asked to attend the hearing, they can be accompanied by a relative, friend, peer or colleague and have any questions directed through this person. However, the alleged victim or the accused cannot expect their representative to respond on their behalf exclusively.

Upon conclusion of the hearing, both parties will be informed **within 5 days** that the decision of the DP is one of the following:

- The allegation is upheld and the accused is subject to one of the sanctions below
- The allegation is rejected and there is no further action

5. Sanctions

The sanctions which may be applied by LCKA for bullying and harassment could encompass one or more of the following:

- A formal apology in terms to be determined by LCKA to any individual adversely impacted by the incidence of bullying or harassment or any damage caused to LCKA's relationships with its stakeholders or the public.
- A verbal or written warning.
- Mandatory attendance at a designated bullying and harassment workshop.
- Temporary suspension.
- Withdrawal or exclusion.
- In very serious instances, law enforcement may be notified.
- In cases deemed gross misconduct, staff may be suspended or dismissed.

Any sanctions imposed will be confidential and no details shared with third parties.

5.1. Appeal by the Alleged Victim

If the allegation is rejected by the Disciplinary Panel, the alleged victim may appeal against the decision **within ten days** to the Appeals Panel (AP) comprising the following members:

- Chief Executive Officer (Chair)
- Executive Dean

The Appeals Panel will review all the evidence and may invite both parties to an AP Hearing. The AP will decide on one of the following **within five days**:

- The decision of the DP is upheld.
- The decision of the DP is overruled and a sanction is imposed.

The AP provides a report to the Senior Leadership Team on the outcome. The Appeals Panel decision is final.

5.2. Appeal by the Accused

If the accused wishes to appeal against the decision of the Disciplinary Panel, they may also appeal against the decision **within ten days** to the Appeals Panel (AP) comprising the following members:

- Chief Executive Officer (Chair)
- Executive Dean

The Appeals Panel will review all the evidence and may invite both parties to an AP Hearing. The AP will decide on one of the following **within five days**:

- The decision of the DP is upheld
- The decision of the DP is upheld but the sanction is reduced or changed
- The decision of the DP is overruled and there is no sanction.

The AP provides a report to the Senior Leadership Team on the outcome. The Appeals Panel decision is final.

5.3. Additional support

LCKA's counselling service will be made available to both parties, regardless of the outcome, once the informal and/or formal procedure(s) have been concluded.

Counselling or mentoring plays a critical role for individuals whose behaviour is deemed unacceptable. They may demonstrate a lack of awareness or sensitivity regarding the impact of their actions, and counselling can potentially modify their behaviour or prevent further incidents. For the alleged victim, counselling or mentoring can provide support in cases where investigations do not warrant disciplinary action.

Support such as counselling and HR guidance will be available to students and staff accused of bullying or harassment during investigations without implying a presumption of guilt.

6. Misuse of this Policy

LCK Academy will take seriously any misuse of this policy for malicious purposes. Knowingly submitting false or malicious allegations may lead to disciplinary action.

7. Preventive Measures

LCK Academy is committed to preventing bullying and harassment through regular training, awareness sessions, and transparent communication. As part of its preventative strategy, LCKA will provide training and awareness resources to all students and staff on bullying and harassment, in addition to sexual harassment, misconduct, digital boundaries, and respectful relationships during induction and through staff trainings and sessions.

LCK Academy recognises its responsibility under the Equality Act 2010 to take all reasonable steps to prevent harassment. Staff or students who believe this policy has been breached without adequate response are encouraged to use the Whistleblowing Policy to raise their concern confidentially. [Whistleblowing Policy-v1.docx](#).

8. Trends and Accountability

All cases involving bullying and harassment will be categorised and tracked separately. Anonymised trend data will be reviewed annually by the Senior Leadership Team and Board of Governors to evaluate the institution's effectiveness and identify areas for improvement.

In addition to internal safeguarding support, LCKA will support alleged victims in accessing external services. For any concerns related to sexual harassment students and staff should consult the LCKA Sexual Harassment Policy and may be referred to services such as the Rape Crisis, Victim Support, the NHS Sexual Health Services, and the Police, where appropriate.

All members of the Senior Leadership Team share responsibility for ensuring that LCKA maintains an inclusive, safe, and respectful environment. This includes proactively addressing inappropriate behaviour, monitoring incident trends, ensuring effective communication of this policy, and regularly reviewing its implementation and effectiveness.

8. Responsibilities

Records should be maintained of any incident and the subsequent investigation and outcomes by the Student Wellbeing Officer if the incident concerns a student or Head of HR if the incident concerns a member of staff. A comprehensive log should be kept of all incidents which are reviewed by the Executive Dean with a view to:

- Assessing the effectiveness of the approaches adopted to dealing with instances of bullying and harassment
- Identifying any patterns in instances of bullying and harassment and developing suitable strategies to address these in order to reduce the incidences of bullying.

The Executive Dean is supported operationally by the Head of HR, who is accountable for ensuring LCKA's policies, procedures, and support systems in relation to staff are robust, fair, and compliant with the OfS Condition E6 requirement on Harassment and Sexual Misconduct.

The Designated Senior Post Holder responsible for the oversight of sexual harassment cases is the Executive Dean: holding ultimate accountability for oversight of such cases. Refer to the LCKA Sexual Harassment Policy for more information.

9. External Support Services

In addition to the internal support available through LCK Academy's Safeguarding Team and Student Wellbeing Officer, students and staff may also wish to access specialist **external organisations** for confidential advice, emotional support, and practical guidance. These services operate independently of the Academy and provide support tailored to a range of experiences.

9.1. Sexual Misconduct and Abuse Support

- **NHS Support after Rape and Sexual Assault** – Medical and emotional care available via local NHS services
- **Rape Crisis** (www.rapecrisis.org.uk) – Support for women and girls affected by sexual violence
- **The Survivors Trust** (www.thesurvivorstrust.org) – National network of specialist support organisations
- **Male Survivors Partnership** (www.malesurvivor.co.uk) – Resources for men affected by abuse
- **Rape Crisis 24/7 Support Line** – Free, confidential helpline: **0808 500 2222**

Domestic Abuse

- **Women's Aid** (www.womensaid.org.uk) – Support for women facing domestic abuse
- **National Domestic Abuse Helpline** – 24/7 freephone: **0808 2000 247**

Mental Health and Crisis Support

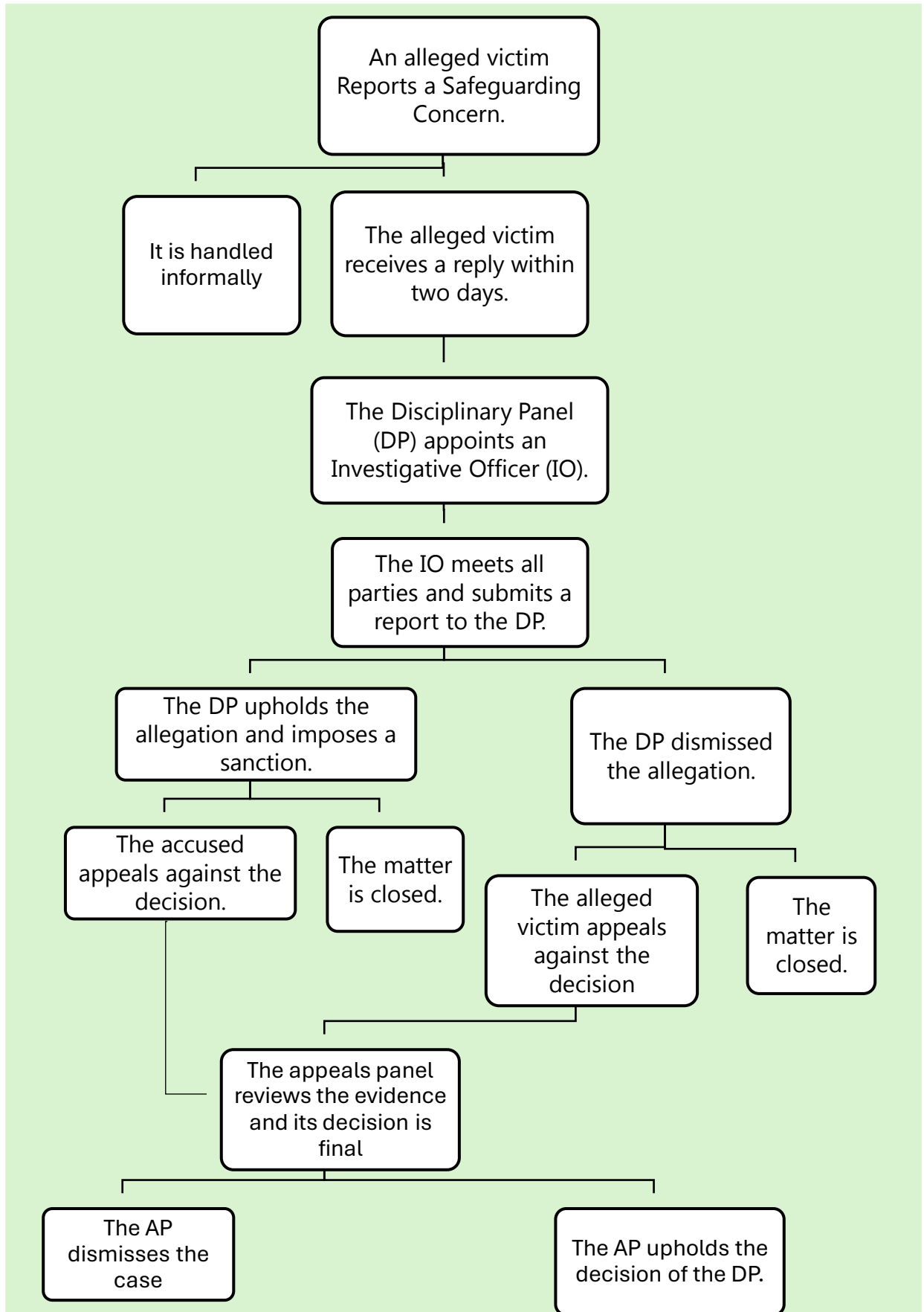
- **Samaritans** (www.samaritans.org) – 24/7 emotional support: **116 123**

Hate Crime Support

- **Stop Hate UK** (www.stophateuk.org) – Support for victims of hate crimes
- **Transgender Hate Crime Support** – via **Galop**: www.galop.org.uk
- **Disability Hate Crime Support** – via **United Response**: www.unitedresponse.org.uk
- **Action Against Stalking** (www.actionagainststalking.org) – National charity for victims of stalking

LCK Academy encourages students and staff to explore these services alongside internal support, especially if they wish to access advice independently or anonymously.

10. Formal Process of Investigation



Appendix 1A: Staff Pre-Counselling Declaration

Staff should complete the following form when requesting or being recommending staff for counselling.

Name.	
Date of declaration.	
Give details of why you seek counselling. This will remain confidential and will only be viewed by authorised LCKA personnel.	

Appendix 1B: Student Pre-Counselling Declaration

Students should complete the following form when requesting or being recommended for counselling.

Name.	
Date of declaration.	
Give details of why you seek counselling. This will remain confidential and only will be viewed by authorised LCKA personnel.	