

Bullying and Harassment Policy (Staff)

Date: 10 June 2026

Last amended by: Tim Johnson

1 Policy for Bullying and Harassment Policy (Staff)

1.1 Statement of Intent

- 1.1.1 The aim of this policy, and the accompanying procedures, is to prevent bullying and harassment of staff and freelance contractors (referred to as "staff" throughout this document) at ThinkSpace Education ("TSE"). This policy provides guidance to resolve any problem should it occur and prevent recurrence.
- 1.1.2 As part of its overall commitment to equality of opportunity, TSE is fully committed to promoting a harmonious working environment where every member of the staff and freelance community is treated with respect and dignity. No one should feel threatened or intimidated because of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, political opinion, race, religion or belief, sex, or sexual orientation. TSE also commits to treating all members of its community with dignity and respect regardless of their role or position within the organisation.
- 1.1.3 Bullying or harassment is unacceptable behaviour in the context of TSE's Equality, Diversity and Inclusion (EDI) Policy and organisational values, and will not be tolerated, permitted, or condoned in any form. TSE believes that bullying and harassment detracts from a productive working environment and can impact negatively on the health, confidence, morale, and performance of those affected by it, including witnesses. TSE is committed to ensuring that the working environment is free from bullying and harassment, and one in which all staff and visitors are treated with dignity and respect.
- 1.1.4 Harassment related to a protected characteristic — including sexual, racial, religious and disability-related harassment — constitutes discrimination and is unlawful under the Equality Act 2010. Harassment may also be a civil or criminal offence and may contravene health and safety legislation.
- 1.1.5 All staff are expected to uphold this policy and use these procedures to support and promote the creation of a bullying-free and harassment-free working environment.
- 1.1.6 TSE strongly encourages staff who consider they are suffering bullying or harassment from another member of TSE to take action under this policy. TSE in turn commits to take seriously and thoroughly investigate any allegations of bullying or harassment that are formally brought to its attention. No person will be treated less favourably for making an allegation in good faith. Where such an allegation is found to be true, disciplinary action will be taken against the perpetrator(s), up to and including dismissal of staff or termination of contracts.
- 1.1.7 Where TSE is made aware of serious cases of harassment when an individual staff member may be criminally liable, TSE will inform the police. TSE will do so with due regard to its duty of care to its staff, as well as its broader duty of care to the wider community. The complainant's right to engage, or not, with any subsequent police investigation is not affected by TSE's action in this regard.
- 1.1.8 This policy is adopted by all staff and guests of TSE.

1.2 Definitions and Forms of Bullying and Harassment

1.2.1 Bullying

TSE defines bullying as: "offensive and unwanted behaviour, which violates a person's dignity, or creates an intimidating, hostile, degrading, threatening or offensive environment or which humiliates or undermines an individual or group."

1.2.2 Harassment

TSE defines harassment as: "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 for that individual."

1.2.3 In addition, the complainant need not possess the relevant characteristic themselves and the conduct can be because of perception or association. Harassment applies to all protected characteristics except for:

- (a) Pregnancy and maternity, where any unfavourable treatment may be considered discrimination.
- (b) Marriage and civil partnership, where any unfavourable treatment may also be considered discrimination.

1.2.4 Forms of bullying and harassment

Bullying and harassment may be perpetrated verbally, physically or via other means of communication including letters, emails, phone, text messages, social media, and instant messaging services such as Slack and Discord. Bullying or harassment perpetrated via TSE's IT network and external IT services utilised by TSE is also in contravention of TSE's staff policies. Bullying and harassment can be carried out by an individual or group of people, and can involve the abuse of authority.

1.2.5 While it is unpleasant to be the target of someone's occasional aggressive behaviour, occasional behaviours are not normally defined as bullying.

1.2.6 Negative behaviours most frequently identified with bullying fall into three main groups:

- (a) Personal insults (e.g. humiliation, personal criticism, ridiculing or demeaning comments).
- (b) Intimidation (e.g. threats of physical violence or psychological intimidation, misuse of power or position).
- (c) Social exclusion (e.g. isolation, scapegoating, victimisation).

1.2.7 Some examples of behaviour which can be bullying and/or harassing are:

- (a) Unwelcome sexual advances.
- (b) Physical conduct ranging from inappropriate touching to serious assault.
- (c) Intimidating, hostile, degrading, humiliating, coercive or threatening behaviour.
- (d) Oral and written harassment through inappropriate jokes, insults, name-calling, racist remarks, offensive language, gossip and slander, sectarian songs, threats and letters.
- (e) Visual displays of images, posters, graffiti, obscene gestures, flags, bunting or emblems, or any other offensive material.
- (f) Isolation, non-cooperation or deliberate exclusion.
- (g) Ridiculing and undermining behaviour; being humiliated in front of others.
- (h) Inappropriate or belittling comments about a person's appearance or personality; intrusive questions or comments about a person's private life.
- (i) Coercion; being pressurised by a group into behaviour or actions against one's wishes, including pressure for sexual favours.
- (j) Intrusion by pestering, spying, following or stalking.

1.2.8 It should be clearly understood that it is the impact of the behaviour which is relevant and not the motive or intent behind it.

1.3 Reasonableness

- 1.3.1 Individual perceptions of what is acceptable behaviour may differ, perhaps due to differences in attitude, experience or culture. The defining factor in determining if behaviour amounts to bullying or harassment is that the behaviour is unacceptable to the recipient and could "reasonably be considered" to be bullying or harassment. The intention of the person engaging in the behaviour — whether or not they meant to bully or harass — is not a primary factor in determining if bullying or harassment has taken place.
- 1.3.2 When considering allegations of bullying or harassment, TSE will therefore apply a test of "reasonableness" to determine if either has taken place. That is, with due regard to the complainant, could the behaviour in question "reasonably be considered" to:
 - (a) Violate the complainant's dignity, or
 - (b) Create an intimidating, hostile, degrading, humiliating or offensive environment for the complainant.

1.4 Staff Rights

- 1.4.1 All staff have the right to work in an environment that is free from any form of bullying or harassment. TSE fully recognises the right of staff to complain about bullying or harassment should it occur. All complaints will be dealt with seriously, promptly, and confidentially. The complaints procedure can be found on the admin dashboard of the TSE VLE.
- 1.4.2 This procedure does not replace or detract from the rights of staff to pursue a complaint under the Equality Act 2010. Every effort will be made to ensure that staff making complaints, and others who give evidence or information in connection with the complaint, will not be victimised.

1.5 TSE's Responsibilities

- 1.5.1 TSE will ensure that adequate resources are made available to promote respect and dignity in the working environment and to deal effectively with complaints of bullying and harassment. This policy and procedure will be communicated effectively to all staff, and TSE will ensure that staff are aware of their responsibilities under it. Appropriate training will be provided to support its implementation.
- 1.5.2 Designated post holders have been identified in Appendix B at the end of this document to provide advice and assistance to staff who are subject to bullying or harassment. TSE will ensure that staff can raise complaints with someone who is aware of, and competent in dealing with, issues of gender, religion or belief, race, disability, and sexual orientation. All complaints of bullying or harassment will be dealt with promptly, seriously, and confidentially.

1.6 Staff Responsibilities

- 1.6.1 Staff have a duty to implement this policy and to make every effort to ensure that bullying and harassment does not occur, particularly in working areas for which they are responsible. Staff have responsibility for any incidents of bullying or harassment of which they are aware. If bullying or harassment does occur, they must deal effectively with the situation.
- 1.6.2 Staff should:
 - (a) Set a good example by treating all colleagues with dignity and respect.
 - (b) Explain TSE's policy to all staff who fall within their remit.
 - (c) Take steps to promote awareness of the procedure for dealing with complaints.
 - (d) Be alert to unacceptable behaviour and take appropriate action.
 - (e) Be responsive and supportive to any colleague who makes an allegation of bullying or harassment.
 - (f) Ensure that colleagues know how to raise bullying or harassment problems.
 - (g) Provide clear advice on the procedure to be adopted.

- (h) Maintain confidentiality.
- (i) Seek to ensure that there is no further problem of bullying or harassment or victimisation after a complaint has been resolved.

1.7 Staff Members' Responsibilities

- 1.7.1 All staff have a responsibility to help create a working environment in which the dignity of everyone is respected. Staff must comply with this policy and should ensure that their behaviour to colleagues or guests does not cause offence and could not in any way be considered to be harassment or bullying.
- 1.7.2 Staff should discourage bullying and harassment by making it clear that they find such behaviour unacceptable and by supporting colleagues who experience such treatment and are considering making a complaint. They should alert the appropriate person (see Appendix B at the end of this document) of any incident of bullying or harassment to enable TSE to deal with the matter.

1.8 Monitoring of Incidents of Bullying and Harassment

- 1.8.1 The Head of Postgraduate Education (HPE), or their nominee, will monitor annually all incidents of harassment and incidents of bullying. Monitoring will consist of a review of all reported incidents, their outcomes, and any patterns or recurring concerns, with a summary reported to the Academic Board each year. The HPE will also be responsible for reviewing the effectiveness of this policy and procedure.

2 Procedures for Addressing Bullying and Harassment, and Sources of Support

2.1 Overview

- 2.1.1 Any individual who believes they have been subject to bullying or harassment has the right to be listened to and have their concerns taken seriously. TSE encourages staff to take action using the guidance set out below — no person will be treated less favourably or suffer detriment for having raised or supported an allegation made in good faith.
- 2.1.2 If an individual believes they are being subjected to bullying or harassment, a number of informal and formal options are available to them. TSE recommends that, where possible and appropriate, attempts to resolve the situation informally should be taken in the first instance. It is however up to the individual to decide how they wish to proceed.
- 2.1.3 Whether an informal or formal approach is chosen, it is recommended that a written record of any incident of bullying or harassment is made as soon as possible after it occurs. This record should be signed, dated and kept for future reference, and a copy should be forwarded to the HPE. Depending on the circumstances, the HPE may discuss it with the complainant to agree a way forward. The report should include:
 - (a) Details of when and where the bullying or harassment has taken place, including dates and times.
 - (b) Details of the alleged perpetrator of the bullying or harassment.
 - (c) Details of the behaviour.
 - (d) Details of any witnesses to the behaviour.
 - (e) Any other evidence, e.g. emails, texts, photos, social media etc.
- 2.1.4 Behaviour that is extreme and/or violent should be reported directly to the Police and an appropriate member of TSE staff made aware.

- 2.1.5 Incidents of a sexual nature, including sexual harassment, sexual assault and sexual misconduct, should be addressed under the TSE Sexual Assault and Misconduct Policy, which is the appropriate route for such cases and sets out the support available.

2.2 Informal Procedures for Addressing Bullying or Harassment

- 2.2.1 If a person believes they are being subjected to bullying or harassment there are a number of ways to deal with the matter quickly and effectively. An informal approach can effectively address the unwanted behaviour without recourse to formal procedures. Informal approaches can have the advantage of resolving the situation quickly and with minimal disruption to relationships. It is recommended that informal approaches be used in the first instance, as this is often sufficient to resolve the matter without the need for more formal means. It is however up to the individual to decide if this approach is appropriate to their situation.
- 2.2.2 Individual action by the complainant
- In some cases, speaking directly with the person concerned can be enough to bring the situation to a close. Sometimes people do not realise that their conduct is causing offence and explaining this to them is enough to make them rethink their behaviour. Ideally, the person should be approached at the earliest opportunity to prevent the behaviour from continuing or escalating.
- 2.2.3 When taking individual action, the complainant should try to:
- (a) Pick a time and a place where they can speak privately and without interruption.
 - (b) Clearly identify the behaviour that is causing concern, giving examples and instances of when it has occurred.
 - (c) Make it clear that the behaviour is unwelcome and must stop immediately.
- 2.2.4 If the complainant feels unable to speak directly to the person concerned, they could try putting their concerns to them in writing. It is advisable to keep a record of any discussions or correspondence at this stage, as this may be useful in the event that further action becomes necessary.
- 2.2.5 Guidance for those accused of bullying or harassment
- Persons who are approached about their behaviour are advised to consider what is being said carefully. They should listen to the request and ensure they understand what they are being asked to do or not do. Persons are advised to try and follow reasonable requests to cease the behaviour described. Even if it was not the intention to cause offence, actions can still constitute bullying or harassment if they could reasonably be considered to have this effect. If this is the case, then behaviour will need to change.
- 2.2.6 In many cases people may feel that there has been a misunderstanding and that they did not intend to cause bullying or harassment. In this case the person engaging in the behaviour should explain that the behaviour would not be repeated and come to an agreement with the complainant regarding what is and is not acceptable. Behaviour that some individuals find acceptable, or even friendly, may be offensive to someone else and this should be respected.
- 2.2.7 Third-party intervention
- If approaching the person directly does not resolve the situation, or is inappropriate, seeking third-party intervention may be helpful. Asking an appropriate person who is not directly involved in the situation to speak with the person concerned can often help get the right message across. For staff, it may be another colleague, a supervisor, or a designated mediator.
- 2.2.8 The third party will seek to resolve the situation quickly and with minimal disruption. Options may include meeting with the alleged harasser to discuss the allegation and make clear that any behaviour that could be considered bullying or harassment under this policy must stop immediately. Alternatively, the third party may facilitate a meeting between the persons involved to discuss the situation and jointly reach agreement on the way forward. Staff may be accompanied by a colleague or representative at their request.

- 2.2.9 Although asking someone to act as a third party may be helpful, complainants should avoid involving too many independent people in the situation as this can be counter-productive in some situations.

2.3 Formal Procedures for Addressing Bullying or Harassment

- 2.3.1 In most cases, following the informal procedures will be effective in resolving the situation. If the informal methods do not achieve satisfactory results, or if the bullying or harassment is particularly serious, a formal allegation should be submitted.
- 2.3.2 Staff wishing to make a formal complaint of bullying or harassment should review the Complaints Policy and Procedure, which can be found in the "policies" section of the TSE VLE.
- 2.3.3 Formal allegations of bullying or harassment should be made in writing to the HPE and include:
- (a) The complainant's personal details.
 - (b) An outline of the allegation (including dates, times and places).
 - (c) Details of the alleged perpetrator of the bullying or harassment.
 - (d) Details of any witnesses.
 - (e) If relevant, details of any informal attempts to resolve the situation and the outcome(s).
- 2.3.4 Formal complaints will be acknowledged within 5 working days of receipt. The HPE (or their nominee) will investigate and aim to communicate an outcome in writing within 20 working days of receipt. Where this is not possible, the complainant will be informed of the revised timescale and the reason for the delay.
- 2.3.5 Where the alleged perpetrator is a student, the matter will be addressed under the Bullying and Harassment Policy (Students) and the TSE Student Disciplinary Procedure. Serious misconduct by a student may also be referred to Arts University Bournemouth (AUB) under the AUB Student Disciplinary Policy, and AUB may impose sanctions independently of TSE.

Appendices

A. Guidance for People Witnessing Bullying or Harassment

Staff who believe they may have been witness to bullying or harassment may want to consider:

- (a) Speaking to the person affected by the bullying or harassment to ask how they felt about the behaviour and to offer support.
- (b) Speaking to the alleged bully or harasser — do they know what they did or said was potentially hurtful?

Staff should also encourage any person affected by bullying or harassment to contact one of the members of staff listed in Appendix B below.

Staff who are present when bullying or harassment occurs should take action to stop it, either by reporting the matter to a supervisor or taking action themselves. It is important to make clear to the person engaging in the behaviour that such actions are unacceptable and can result in disciplinary action.

Silence or inaction by those witnessing or receiving reports of bullying or harassment can be interpreted as collusion or endorsement of such behaviour and creates an environment in which bullying and harassment are deemed to be acceptable.

B. Sources of Help and Advice for Staff

Role	Name	Contact
Director	Guy Michelmore	guym@thinkspace.ac.uk
Head of Postgraduate Education	Tim Johnson	tim@thinkspace.ac.uk
Human Resources	Sarah White	sarah@thinkspace.ac.uk