



King's Group Academies

DIGNITY AT WORK POLICY

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Introduction

King's Group Academies is committed to providing a work environment free of harassment and bullying, where everyone is treated with dignity and respect. All staff are expected to model respectful behaviour and contribute to a positive working culture. The Trust takes a firm stance against bullying between pupils, and it is important that all staff lead by example with their own behaviour.

The Trust takes a firm and proactive approach to bullying, harassment and sexual harassment.

Harassment and bullying can have very serious consequences for individuals and the Trust including harm to wellbeing and psychological safety, loss of morale, poor work performance, increased turnover of staff, legal claims and damage to our reputation.

We will take allegations of harassment or bullying seriously and address them promptly and confidentially where possible. Harassment or bullying by an employee will be treated as misconduct under our Disciplinary Procedure. In some cases it may amount to gross misconduct leading to summary dismissal.

We aim to create a culture where inappropriate behaviour is challenged early, constructively and respectfully, and where all staff feel confident to speak up.

The Trust recognises that individuals may communicate, process information and interact in different ways, including those who are neurodivergent (for example, individuals with autism, ADHD, dyslexia or other neurodevelopmental differences). We are committed to ensuring that differences in communication style or behaviour are understood and considered appropriately, and not misinterpreted as inappropriate conduct where this is not the case.

This policy does not form part of any employee's contract of employment and may be amended at any time.

Scope and Purpose of this Policy

The policy sets out the types of behaviour that are unacceptable and covers bullying and harassment both in and out of the workplace, including during work-related social functions, training events, school trips, school events, online platforms and other off-site activities connected with work.

This includes conduct on digital platforms, social media, messaging applications and any use of information and communications technology (ICT), whether on Trust systems or personal devices, where this impacts on the dignity of staff or working relationships.

This policy applies to all employees of the Trust, governors, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy).

The Trust will take all reasonable steps to prevent harassment and bullying by third parties and will take appropriate action where it knows, or ought reasonably to know, that such behaviour has occurred. This may include setting clear expectations of behaviour, implementing control measures, supervised access to sites, exclusion from premises, or termination of a contract where necessary to protect staff.

Concerns about bullying or harassment will normally be considered under this policy rather than the Grievance Policy. The Trust will determine the most appropriate procedure where issues overlap, to avoid duplication and ensure matters are addressed fairly and proportionately.



This policy should be read alongside related policies including the Code of Conduct and Behaviour Policy, Disciplinary Policy, Grievance Policy, Safeguarding and Child Protection Policy and Whistleblowing Policy.

Roles and Responsibilities

All staff are responsible for:

- treating others with dignity and respect;
- challenging or reporting inappropriate behaviour where it is safe to do so;
- cooperating with any investigations conducted under this policy.

Managers are responsible for:

- leading by example and modelling appropriate behaviour;
- taking all complaints seriously and acting promptly;
- ensuring no victimisation occurs;
- seeking advice from the People Team where appropriate;
- ensuring early, informal intervention where appropriate to prevent escalation;
- ensuring appropriate action is taken to prevent recurrence.

The Trust is responsible for:

- taking proactive steps to prevent harassment, including sexual harassment;
- providing training and clear reporting routes;
- monitoring trends and taking action where risks are identified.

The Legal Framework

The Equality Act 2010 prohibits harassment related to protected characteristics. The Protection from Harassment Act 1997 makes it unlawful to pursue a course of conduct which is known, or ought reasonably to be known, to amount to harassment.

Under the Health and Safety at Work Act 1974 staff are entitled to a safe place and system of work. Individual members of staff may in some cases be legally liable for harassment.

The Trust recognises its duty to take reasonable steps to prevent sexual harassment in the workplace. In line with the Worker Protection (Amendment of Equality Act 2010) Act 2023, the Trust will take proactive and reasonable steps including:

- regular assessment of risks;
- clear behavioural expectations;
- mandatory training;
- accessible reporting routes;
- prompt action;
- monitoring patterns.

What is Harassment?

Harassment is any unwanted conduct which has the purpose or effect of:

- (a) violating a person's dignity; or
- (b) creating an intimidating, hostile, degrading, humiliating or offensive environment for them.



It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct related to a protected characteristic, as set out in "The legal framework" above, or of a sexual nature (sexual harassment).

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. This may include verbal, non-verbal or physical conduct and may occur regardless of intention. Harassment is unacceptable even if it does not fall within any of these categories.

Examples of sexual harassment may include (but are not limited to):

- sexual comments or jokes, including "banter";
- comments about appearance or body;
- intrusive questions about a person's private or sexual life;
- displaying or sharing sexually explicit material;
- unwanted physical contact or advances.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for them. Harassment may also occur even if an individual does not have a protected characteristic, but another individual engages in unwanted conduct towards them because:

- (a) they perceive the recipient to have a protected characteristic; or
- (b) they are associated with a person who does have a protected characteristic.

A single incident can amount to harassment although first-time conduct which unintentionally causes offence will not usually be harassment. However it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them.

What is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Bullying may occur between peers, from manager to employee, or employee to manager.

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own. It is also recognised that differences of opinion, outbursts of bad temper etc may occur from time to time in any normal working environment. We would normally expect our employees to resolve through informal processes rather than through the use of the formal procedure set out below.

When considering whether behaviour amounts to bullying, the Trust will take into account individual circumstances, including whether behaviours may be linked to a disability or neurodivergent condition. In such cases, appropriate support, advice and reasonable adjustments will be considered alongside any management action.



Examples of Bullying and Harassment

Bullying and harassment can take the form of physical, verbal and non-verbal conduct. Employees should always consider whether their words or conduct could be offensive. Conduct may be harassment or bullying whether or not the person behaving in that way intends to offend. Examples of unacceptable conduct include:

- (a) unwanted physical conduct including touching, pinching, brushing past someone, invading their personal space, and more serious forms of physical or sexual assault;
- (b) unwelcome sexual advances or suggestive behaviour or suggestions that sexual favours may further a career or that a refusal may hinder it;
- (c) continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- (d) sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet);
- (e) offensive or intimidating comments or gestures, or insensitive jokes or pranks;
- (f) jokes or comments about an individual's age, disability, sexual orientation or religion, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- (g) ignoring or shunning someone, for example, by deliberately excluding them from a conversation, a workplace social activity or from meetings;
- (h) shouting at, being sarcastic towards, ridiculing or demeaning others;
- (i) physical or psychological threats;
- (j) overbearing and intimidating levels of supervision;
- (k) inappropriate and/or derogatory remarks about someone's performance;
- (l) abuse of authority, power or status by those in positions of seniority.

Cyber bullying is defined as any use of information and communications technology (ICT) to support deliberate and hostile attempts to hurt, upset or embarrass another person. This may occur through Trust systems or personal devices and accounts.

Examples of cyber bullying may include:

- offensive or threatening emails or messages;
- harassment via email, messaging apps or social media;
- posting defamatory, offensive or inappropriate content online;
- sharing private or personal information without consent;
- liking, sharing or commenting on offensive or discriminatory content (including racist material);
- repeated or excessive contact outside working hours;
- using technology to target or isolate individuals.

Cyber bullying is treated as seriously as face-to-face bullying and may result in disciplinary action.

Additional examples may include:

- sharing or requesting intimate images or personal information;
- creating or sharing inappropriate content via social media, messaging apps or work platforms;
- repeated unwanted contact outside working hours;
- misuse of digital or AI tools to create humiliating or sexualised material.



Informal Steps

If you think you are being bullied or harassed, you should initially consider raising the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your line manager (or another manager if the matter relates to your line manager), who can provide advice and assistance in resolving the issue formally or informally.

Where appropriate, informal resolution may include facilitated conversations or mediation supported by a manager or the People Team.

If you are not certain whether an incident or series of incidents amount to bullying or harassment, you should initially contact your line manager (or another manager if the matter relates to your line manager) informally for confidential advice.

If informal steps have not been successful or are not possible or appropriate, you should follow the formal procedure set out below.

While the decision to make a complaint rests with the individual, the Trust may progress matters without the complainant's consent where necessary to meet its legal duties, safeguard individuals, or prevent further harassment or bullying.

Raising a Formal Complaint

If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your line manager, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. If the matter concerns that person, you should refer it to the next person senior to that individual.

Where the Executive Headteacher/Principal/Headteacher feels bullied or harassed they should raise the matter with the Chair of Governors, or if it involves the Chair of Governors, with the Trust.

Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

Formal Investigations

We will investigate complaints in a timely and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it. The investigation will be conducted by someone with no prior involvement in the complaint. The investigation should be thorough, impartial, objective and carried out with sensitivity and due respect for the rights of all parties concerned.

Investigators will take into account individual needs and circumstances, including any known disabilities or neurodivergent conditions, and will make reasonable adjustments to ensure that all parties can participate fully in the process.

All stages of the investigation process will be progressed without unreasonable delay. Where stated timescales cannot be met, the parties will be kept informed and provided with an update. Please note that timescales are indicative and may be extended where complexity, safeguarding considerations, or witness availability require this.

We will arrange a meeting with you, usually within five working days of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a



trade union representative of your choice, who must respect the confidentiality of the investigation. You will be given an indication of the timescales for the investigation. The investigator will arrange further meetings with you as appropriate throughout the investigation.

Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require and there is no alternative to suspension. The investigator will also meet with the alleged harasser or bully who may also be accompanied by a colleague or trade union representative of their choice to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

Where your complaint is about someone other than an employee, such as a contractor, pupil, parent or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the Academy and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.

We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example you may ask for changes to your duties or working hours so as to avoid or minimise contact with the alleged harasser or bully.

It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.

At the end of the investigation, the investigator will submit a report to the Executive Headteacher/Principal/Headteacher nominated to consider the complaint. Both parties will be informed of the outcome of the investigation and whether any further action will be taken. A summary of the findings may be shared where appropriate, but the Trust reserves the right to withhold or redact information in order to protect confidentiality, the rights of other individuals and its data protection obligations.

A written record of all complaints, investigations and outcomes will be retained in accordance with the Trust's retention schedule.

Action Following the Investigation

If the Executive Headteacher/Principal/Headteacher considers that harassment or bullying has occurred, prompt action will be taken to address it.

Where the harasser or bully is an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure.

Where the harasser or bully is a third party, appropriate action might include speaking or writing to the person and/or their superior about their behaviour, or, in very serious cases, banning them from the premises or terminating a contract with them.

Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the alleged harasser or bully. It may be appropriate to arrange some form of mediation and/or counselling or to change the duties, working location or reporting lines of one or both parties.

Any staff member who is found to have knowingly provided false information or otherwise acted in bad faith as part of an investigation may be subject to action under our Disciplinary Procedure.



Appeals

If you are not satisfied with the outcome, you may appeal in writing to the Executive Headteacher/Principal/Headteacher within five working days of the date on which the decision was sent or given to you, setting out your full grounds of appeal.

We will hold an appeal meeting, normally within five working days of receiving your written appeal. This will be dealt with impartially by a more senior manager who has not previously been involved in the case (although they may seek clarification from those previously involved where necessary). You may bring a colleague or trade union representative to the meeting.

We will confirm our final decision in writing, usually within five working days of the appeal hearing. This is the end of the procedure and there is no further right of appeal.

Protection and Support for Those Involved

Staff who make complaints or who participate in good faith in any investigation conducted under this policy are legally protected from victimisation. Any form of retaliation or detrimental treatment will be treated as a serious disciplinary matter.

Victimisation is subjecting a person to a detriment because they have in good faith:

- (a) complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else; or
- (b) supported someone to make a complaint; or
- (c) given evidence in relation to a complaint.

This would include isolating someone or giving them a heavier or more difficult workload. If you believe you have suffered any such treatment you should inform your line manager. If the matter is not remedied you should raise it formally using our Grievance Procedure or this procedure if appropriate.

Making a complaint or giving evidence that you know to be untrue may lead to disciplinary action being taken against you.

The Trust will ensure that fear of repercussions does not deter genuine reports made in good faith.

Anyone found to have retaliated against or victimised someone for making a complaint or assisting in good faith with an investigation under this procedure will be subject to disciplinary action.

Where a complaint is found to have been made in bad faith or with malicious intent, this may result in disciplinary action.

Where concerns indicate potential safeguarding risks, these will be managed in line with the Trust Safeguarding and Child Protection Policy.

If a complaint is made against you, do not dismiss the complaint out of hand because you were only joking or think the complainant is being too sensitive. Remember that different people find different things acceptable and everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. You may have offended someone without intending to. If that is the case, the person concerned may be content with an explanation and an apology from you and an assurance that you will be careful in future not to behave in a way that you now know may cause offence. Provided that you do not repeat the behaviour that has caused offence that may well be the end of the matter.



We offer access to confidential counselling, which is available on request for anyone affected by, or accused of, bullying or harassment. The details are available in confidence from CentralHR@kingsacademies.uk.

Additional support may include access to the EAP, wellbeing risk assessments, a named People Team or academy contact, temporary adjustments to duties, reporting lines or working arrangements where appropriate.

Confidentiality and Data Protection

Confidentiality is an important part of the procedures provided under this policy. Everyone involved in the operation of the policy, whether making a complaint or involved in any investigation, is responsible for observing the high level of confidentiality that is required. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis.

As part of the application of this policy, the Academy and/or Trust may collect, process and store personal data in accordance with the Trust Data Protection Policy and Staff Privacy Notice. We will comply with the UK GDPR and the Data Protection Act 2018. Records will be kept in accordance with the Staff Privacy Notice and the Trust's retention schedule.

Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.

Information will be retained only for as long as necessary and in accordance with the Trust's retention schedule and Staff Privacy Notice.

Training and Awareness

The Trust will ensure that staff receive appropriate information, guidance and training on standards of behaviour, including harassment and sexual harassment, and on how to raise concerns under this policy. Training will be proportionate to role and responsibility and reviewed regularly. This will include awareness of neurodiversity and inclusive communication to support understanding and appropriate application of this policy.

Review of this Policy

This policy is reviewed and amended as required by King's Group Academies. We will monitor the application and outcomes of this policy to ensure it is working effectively.