



**GREEN VALLEY ACADEMY**

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# Anti-Harassment and Bullying Policy

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**Approved: October 2026**

## DOCUMENT CONTROL

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| <b>Reference</b>        | GVA-20                                                                                                                                                                                                                                                                         |
| <b>Policy owner</b>     | Wellbeing Team Leader (students); Group HR Executive Lead (staff)                                                                                                                                                                                                              |
| <b>Approved by</b>      | Academic Board — 5 October 2026                                                                                                                                                                                                                                                |
| <b>Effective from</b>   | 5 October 2026                                                                                                                                                                                                                                                                 |
| <b>Next review</b>      | August 2027                                                                                                                                                                                                                                                                    |
| <b>Applies to</b>       | All students, staff, contractors and visitors, on campus, online, and in any Academy-related activity                                                                                                                                                                          |
| <b>Linked documents</b> | Sexual Misconduct, Sexual Harassment and Staff–Student Relationships Policy; EDI Policy (Equity, Diversity and Inclusion Policy); Safeguarding and Prevent Policy; Report and Support Form (Form 3); Student Discipline Procedure; staff disciplinary and grievance procedures |

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## 1. PURPOSE AND COMMITMENT

- 1.1** Every person who studies at, works at or visits Green Valley Academy is entitled to an environment free from harassment, bullying and victimisation, and the Academy commits itself to securing that environment through prevention, through accessible and safe routes for raising concerns, through fair and timely resolution, and through consequences for those who breach this policy which are proportionate, consistent and real. This policy states what harassment, bullying and victimisation are; sets out, in one place and for students and staff alike, how to report them and what support is available; prescribes how reports are handled, from informal resolution to formal investigation and outcome; and establishes the monitoring through which the governing body satisfies itself that the policy works in practice. Conduct of a sexual nature is governed by the Sexual Misconduct, Sexual Harassment and Staff–Student Relationships Policy, which provides enhanced protections; where conduct engages both policies, the Sexual Misconduct, Sexual Harassment and Staff–Student Relationships Policy prevails.

## 2. DEFINITIONS

- 2.1** Harassment means unwanted conduct related to a protected characteristic under the Equality Act 2010 — age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation — which has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Whether conduct has that effect is judged with regard to the perception of the person affected, the circumstances, and whether it is reasonable for the conduct to have that effect; a single incident, if sufficiently serious, can amount to harassment; conduct may amount to harassment although it was not directed at the complainant; and intention is not required — a person may harass without meaning to, though intention aggravates.
- 2.2** Bullying means offensive, intimidating, malicious or insulting behavior, or a misuse of power or position, which undermines, humiliates, denigrates or injures another person, whether it occurs face to face, in writing, online or through exclusion, and whether it consists of a single serious incident or a course of conduct. Victimisation means subjecting a person to detriment because they have made, supported, or are believed to have made or supported, a report or complaint under this policy or related legislation and is prohibited as strictly as the conduct originally complained of. For the avoidance of doubt, the legitimate and properly conducted exercise of academic or managerial functions — fair assessment and feedback, reasonable performance management, reasonable instructions and the fair application of procedures — does not constitute bullying or harassment, however unwelcome its content may be.

## 3. STANDARDS OF BEHAVIOUR

- 3.1** The Academy expects, and this policy requires, courtesy and professional respect in every interaction within its community: between staff and students in teaching, supervision and support; among students in classrooms, common spaces and online groups; among colleagues at every level; and towards and from visitors and contractors. These standards apply equal force to electronic communication and social media, where conduct connected with the Academy community is subject to this policy irrespective of

the platform on which it occurs. Members of staff additionally hold positions of professional trust in relation to students, and the boundaries prescribed by the Code of Conduct in the Safeguarding and Prevent Policy and by Part B of the Sexual Misconduct, Sexual Harassment and Staff–Student Relationships Policy form part of the standards enforced under this policy.

## 4. RAISING A CONCERN

- 4.1** A student may raise a concern with any member of staff they trust, with their Personal Academic Tutor, with the Wellbeing team directly, or through the online Report and Support Form (Form 3), which accepts named and anonymous reports; every named student report shall receive contact from a trained member of the Wellbeing team within two working days. A member of staff or contractor may raise a concern with their line manager, with the Group HR Executive Lead, or through Form 3; where the concern involves the line manager it may be taken directly to HR or the Principal, and where it involves the Principal it shall be taken to the Chair of the Board of Directors, whose contact details are published for this purpose. Any person may additionally use the Whistleblowing Policy where they believe wrongdoing is being concealed or fear reprisal, and any person may report conduct to the police where it may be criminal, with the Academy's active support and without being required to choose between routes.
- 4.2** **This policy is not an emergency service: where any person is in immediate danger, the first call is to 999, and the Academy's processes follow.** Support under Section 5 is available from the moment a concern is raised, named or not, formal or not, and is never conditional upon the pursuit of any process.

## 5. SUPPORT

- 5.1** The support available to any person affected by conduct within this policy comprises: a named contact within the Wellbeing team, or within HR for staff, for the duration of the matter; practical interim measures where feasible, including adjustments to seating, groupings, timetabling or communication channels; referral under the Mental Health and Wellbeing Referral Policy; safeguarding action under the Safeguarding and Prevent Policy where the person is at risk; and signposting to external sources of support
- 5.2** The current local specialist services — including hate-crime reporting, victim support and domestic abuse services for Luton and Bedfordshire — shall be published alongside Form 3 and in the Student Handbook. These services include Bedfordshire Police (101), Stop Hate UK (0800 138 1625), Bedfordshire Victim Care Services (0800 028 2887), Women's Aid Luton (01582 391856) and the National Domestic Abuse Helpline (0808 2000 247). These services shall be verified each year. Support shall be offered to responding parties as well as reporting parties, since unresolved allegations damage everyone, they touch, and the offer of support implies no view of the merits.

## 6. RESOLUTION: INFORMAL AND FORMAL ROUTES

- 6.1** Where the person affected wishes it, and the conduct is suitable for it, informal resolution shall be attempted first: a clear request to stop, made by the person or on their behalf; a

facilitated conversation; or an intervention by a manager, Personal Academic Tutor or Wellbeing Officer, in each case with a brief written note retained. Informal resolution is never appropriate for serious allegations, shall never be pressed upon a reluctant complainant, and its failure shall not prejudice the formal route. Formal resolution proceeds upon a written report: a trained, impartial investigator shall be appointed; both parties shall be heard, shall be entitled to be accompanied, and shall receive updates at least fortnightly; interim protective measures may be applied without prejudgment; findings shall be made on the balance of probabilities; and the investigation shall conclude within thirty working days wherever possible, any extension being explained in writing to both parties.

- 6.2** Outcomes shall be determined under the procedure appropriate to the responding party: for students, the Student Discipline Procedure and, where engaged, the University of Wolverhampton's regulations, with outcomes up to expulsion; for staff, the disciplinary procedure operated with group HR, with outcomes up to dismissal; and for visitors and contractors, exclusion and termination of engagement. Both parties shall receive the outcome in writing with the applicable appeal route; confidentiality shall be maintained on a need-to-know basis throughout, and no confidentiality expectation shall ever prevent any person from reporting to the police or a regulator. An allegation shown to have been made maliciously or in knowing falsehood — as distinct from an honest report not upheld — is itself misconducted.

## **7. PREVENTION, MONITORING AND REVIEW**

- 7.1** Prevention shall be delivered through: induction for every student and member of staff covering this policy, expected behaviors and reporting routes; annual refresher training, with enhanced content for managers, investigators, Personal Academic Tutors and the Wellbeing team; active-bystander guidance encouraging safe intervention and reporting; and visible, repeated leadership communication of the standards this policy protects. The Wellbeing Team Leader shall maintain a confidential case log; anonymised data on volumes, categories, timeliness and outcomes shall be reviewed each term by the Student Support, Safeguarding and Wellbeing Committee and by the EDI Committee, which shall examine whether particular groups are disproportionately affected; and an annual report shall be made to the Board of Directors. This policy shall be reviewed annually in the light of that data and of current sector guidance.