

Student Anti-Bullying and Harassment Policy

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POLICY STATEMENT:

1. Vision and Strategic Purpose

Salt Training Limited is committed to the elimination of harassment, bullying and victimisation on any basis, including age, disability, sex, gender reassignment, race, religion or belief, sexual orientation, marriage and civil partnership, pregnancy, maternity and caring responsibilities, physical appearance, and political views.

Every member of Salt Training Limited has the right to study or work without fear of harassment, bullying or victimisation. The organisation recognises that the safety and wellbeing of learners is central to its success, values and reputation. We are dedicated to providing a supportive, inclusive, and positive learning environment free from unacceptable behaviours so that learners can access and benefit from their experience of education.

Harassment, bullying, or victimisation—including sexual misconduct—is regarded as an offence under current legislation and is contrary to Salt Training Limited’s culture and values. A **zero-tolerance** approach will be taken toward such behaviours. All reports will be investigated fully and, if substantiated, could lead to exclusion or other formal disciplinary processes. Incidents instigated by third parties will also be pursued appropriately.

Policy awareness will be promoted during student induction and through annual sessions for both staff and students addressing the policy content and individual responsibilities.

2. What is Harassment?

According to the Equality Act 2010, harassment is defined as any unwanted behaviour that is connected to a protected characteristic—such as age, disability, gender identity, race, religion or belief, sex, or sexual orientation—that has the purpose or effect of violating someone’s dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

This type of behaviour may be deliberate or thoughtless, and a single incident can be enough to constitute harassment. It affects not only how a person feels but can also undermine their safety, wellbeing, and ability to fully participate in learning. At Salt Training Limited, we view any form of harassment or bullying seriously, regardless of the intent behind it. What matters most is how it impacts the individual on the receiving end.

Harassment can be persistent or an isolated event. It may target one individual or a group and can occur in a variety of ways:

Physical harassment includes acts like intimidation, physical gestures intended to threaten, assault, or aggressive behaviour that makes someone feel unsafe or uncomfortable.

Verbal harassment involves spoken or written language that includes name-calling, assumptions, stereotypes, sexualised or unwelcome remarks, derogatory jokes, malicious gossip, or suggestions and propositions. This type of behaviour is often tied to characteristics such as someone’s disability, gender, appearance, political beliefs, or family responsibilities. Even something as subtle as tone of voice can cause distress, whether intended or not.

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Non-verbal harassment includes actions or representations that are offensive without words being spoken. This can range from displaying discriminatory images or literature, using suggestive body language, invading someone's personal space, or excluding someone from activities. It also includes actions like graffiti, digital or computer-generated content, or deliberately isolating someone in social or learning spaces.

It's important to remember: behaviour does not have to be directed at a specific individual to be considered harassment. Even bystanders can be affected by an offensive environment.

3. Sexual Harassment and Misconduct

Sexual harassment is any **unwanted behaviour or communication of a sexual nature** that causes distress, discomfort or offence. This behaviour may be verbal, physical, written, or digital, and it can leave individuals feeling humiliated, intimidated, degraded, or unsafe. It includes, but is not limited to:

- Sexual jokes, innuendos or comments
- Leering, wolf-whistling or intrusive staring
- Upskirting or any unwanted photographing of intimate areas
- Derogatory remarks relating to sex or gender
- Inappropriate physical contact, such as groping or touching
- Sexual propositions or suggestive remarks
- Stalking or following someone
- Circulating sexual images, videos or literature without consent
- Sending unsolicited sexual messages via email, messaging or social media

Salt Training Limited acknowledges that any incident which an individual feels **crosses personal or professional boundaries** may be considered sexual harassment. It is the **experience of the individual**, not the intention of the perpetrator, that determines whether behaviour is deemed inappropriate.

Sexual Misconduct

Sexual misconduct refers to a broader category of **unwanted sexual behaviours**, which may also include:

- Physical sexual assault, including those defined under the Sexual Offences Act 2003
- Rape or attempted rape
- Coercive sexual advances that create a hostile or intimidating learning environment
- Promising educational, financial, or social rewards in exchange for sexual favours
- Grooming or manipulative behaviour towards vulnerable individuals
- Sharing private, intimate images or videos without consent (also referred to as "revenge porn")

All forms of sexual harassment and misconduct are taken seriously and could result in disciplinary action, safeguarding intervention, or criminal investigation.

4. Digital Conduct, Cyberbullying and Professional Boundaries

Salt Training Limited has a statutory duty under the *Education and Inspections Act 2006* to provide appropriate support to students, staff, and their families in the event of cyberbullying. In line with our safeguarding commitments, we actively monitor and filter internet usage across platforms, including email,

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messaging services, and collaborative learning tools. Any misuse of these systems to harass or intimidate others is treated as a serious disciplinary matter and will be addressed in accordance with our Behaviour and Disciplinary Policy.

Students and staff may interact via Salt Training's official learning platforms (such as the Virtual Learning Hub, Microsoft Teams, email or internal messaging tools). However, **communication between staff and students via external social networking platforms (e.g. Facebook, WhatsApp, Instagram, TikTok) is not permitted** under any circumstances. Any direct or indirect contact outside these boundaries that is inappropriate, or could be interpreted as bullying or harassment, will be reviewed and dealt with even if it occurs off-site or outside normal programme hours.

5. Recognising Signs of Bullying or Harassment

We understand that some learners may not always disclose incidents directly. Therefore, it is important that staff and peers remain aware of common warning signs that may indicate someone is experiencing bullying or harassment:

- Drop in attendance or reluctance to attend learning sessions
- Increased anxiety, withdrawal, sleep disturbance or nightmares
- Visible distress when accessing digital platforms or receiving messages
- Avoidance of public transport or travelling to Salt Training
- Damage to personal belongings or unexplained injuries
- Sudden decline in class performance or engagement
- Low self-esteem or heightened sensitivity to interactions
- Expressions of hopelessness, self-harm, or talk of running away
- Nervous or jumpy reactions to mobile phone notifications
- Fear or refusal to use technology or the internet

If any of these signs are observed, staff and peers are encouraged to act. Where appropriate, a calm conversation with the learner may be helpful—or alternatively, concerns should be passed immediately to a safeguarding lead, tutor or mentor.

5. Applicability

This policy applies across the Salt Training Limited learning community and covers any instance of bullying or harassment that may occur:

- Between learners
- Between learners and staff
- While learners are on placement
- During off-site visits, enrichment, or community engagement work

Salt Training Limited is committed to promoting mutual respect, personal responsibility, and inclusivity in all areas of learning. All learners and staff are expected to take accountability for their conduct and adjust behaviours to ensure that no individual feels excluded, threatened, or demeaned.

This policy should be read in conjunction with the College's Student Disciplinary Procedures and Agreed Standards of Behaviour.

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6. Prevention and Response: Salt Training Limited's Commitment

Salt Training Limited recognises its duty under the *Education and Inspections Act 2006* to take all reasonable steps to **prevent bullying and harassment** within the learning environment and to respond promptly, effectively and sensitively when incidents occur.

We are committed to creating and maintaining a culture of transparency, safety and respect. To ensure this, we:

- **Raise awareness** through staff and learner induction, tutorials, and specialist training
- Make this **policy and associated procedures** readily accessible to all learners and staff—via the Salt Training intranet, learner platforms, induction packs, and on request
- Deliver **annual refresher sessions** for all learners and staff covering both the policy and their individual responsibilities
- Make clear that this policy applies to **all Salt Training activities**—including travel to and from learning centres, during off-site visits or placements, and while representing the organisation in any capacity
- Expect all learners and staff to actively **adhere to and support** the policy principles and challenge inappropriate behaviour when observed
- Provide **targeted training for managers** and programme leads to ensure they can confidently uphold the policy, remain legally compliant, and support effective communication of these standards
- Integrate the policy into our **safe student and staff feedback cycles**, including surveys and wellbeing reviews, to ensure lived experiences inform future improvements
- Use **reasonable adjustments** to provide accessible versions of this policy for learners with specific learning needs. Information will be adapted to meet each learner's requirements as identified during initial risk assessments or support planning

We have also implemented a confidential **"Report and Support" function**, which is available to all learners and staff via the Salt Training portal. This tool allows individuals to share their concerns safely and, if desired, anonymously.

7. Staff Responsibilities

Every member of staff is expected to act in a manner that upholds dignity and respect. They are required to reflect on how their own behaviour could be perceived by others and avoid conduct that may cause offence, discomfort, or misunderstanding.

- **Mentors and Personal Tutors** must provide tailored, consistent support for any learner involved in—or impacted by—allegations of bullying or harassment
- **Trainers, Lecturers, and Programme Managers** are responsible for ensuring curriculum delivery upholds the spirit and requirements of this policy at all times
- **All staff** have a legal and professional duty to treat allegations seriously, investigate them promptly, and escalate safeguarding concerns as necessary
- Staff must take **proactive action** when witnessing inappropriate behaviour or when disclosures are made, ensuring the wellbeing of all learners involved
- **Intimate personal relationships between staff and enrolled learners are strictly prohibited** under safeguarding guidance and Salt Training's code of conduct

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8. Responding to Incidents

The appropriate level of response will depend on the nature and severity of the behaviour. Possible responses include:

- **Challenging the behaviour** directly in a calm and appropriate manner
- **Facilitated mediation**, if both parties are open to resolution and this is deemed suitable
- A **formal complaint** investigation under Salt Training Limited's Behaviour and Disciplinary Policy

Staff and students who may feel unconfident in challenging behaviour directly are encouraged to seek immediate support from a safeguarding lead, mentor, or line manager. In some cases, individuals may choose to nominate a trusted peer or adult to act on their behalf.

7. Challenging Unacceptable Behaviour

At Salt Training Limited, we encourage a culture where learners and staff feel empowered to speak out against bullying, harassment or inappropriate conduct. Where possible, individuals who experience such behaviour are encouraged to calmly and clearly ask the person to stop and explain why the behaviour is not acceptable. We recognise that this is not always easy to do, so support is available throughout the process.

All members of the Salt Training community—both staff and learners—have a responsibility to challenge bullying or harassment when they witness it. This means:

- Considering whether the behaviour observed is genuinely unwanted or harmful, rather than mutual horseplay where both parties willingly participated
- Making it clear to the person exhibiting the behaviour that their actions are unacceptable, explaining the impact it may be having on others
- Offering encouragement and reassurance to the person experiencing the behaviour

If a learner or staff member doesn't feel confident addressing the issue directly, they are strongly encouraged to speak with a **Safeguarding Lead, Mentor, Tutor**, or another trusted member of the team. Challenging the behaviour directly may be enough to stop it—sometimes individuals are unaware that their actions are hurtful or inappropriate. However, if the behaviour continues, it may be necessary to move forward with mediation or a formal complaint.

8. Accessing Support

Salt Training Limited understands that raising concerns about bullying or harassment can be emotionally difficult, especially for learners who may have experienced trauma or are at heightened vulnerability. Therefore:

- Learners may ask a trusted friend, peer, mentor, tutor, or support worker to raise the issue on their behalf
- All complaints are treated seriously and will be handled in a sensitive, respectful and non-judgemental manner
- Support will be provided to both the individual making the complaint and the person accused, to ensure dignity and procedural fairness

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We are committed to ensuring that every learner feels heard and supported, and that any incident brought forward is addressed in line with our safeguarding and disciplinary procedures.

Helpful Resources

For further guidance or support, learners may wish to visit:

- Bullies Out
- Childline
- Anti-Bullying Alliance
- BeatBullying

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