



Anti-Harassment and Bullying Policy

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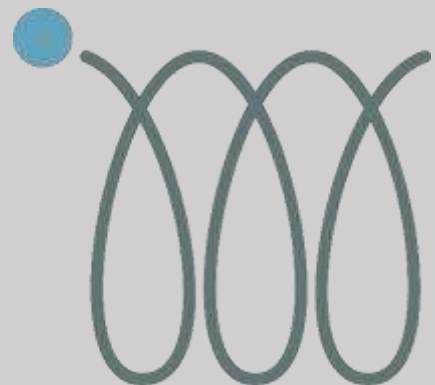
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1. Policy Statement

Grace Foundation wishes to provide a supportive working environment which will enable its staff to fulfil their personal potential and creativity. Such an environment cannot exist where any member of staff is subjected to harassment, intimidation, aggression or coercion.

Grace Foundation is fully committed to the principles of equality and diversity in the workplace and regards harassment as a form of discrimination. As such, there will be zero tolerance of any form of bullying or harassment.

All complaints of harassment and bullying will be taken seriously, investigated promptly, and handled in confidence.

2. Harassment

Harassment is unwanted conduct which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It may be on the grounds of sex, marital status, race, disability, religion or beliefs, sexual orientation, age or gender reassignment. For the purposes of this policy the list should be considered non-exhaustive, and harassment or bullying on any grounds will not be tolerated by Grace Foundation.

Harassment may be persistent or an isolated incident, obvious or subtle, face-to-face or indirect. It may even be through unequal or unfair application of monitoring systems, for example through the monitoring of breaks where it is not applied equally to all employees.

Examples of behaviour which may constitute harassment or bullying include (but are not limited to):

- Insensitive jokes and pranks
- Lewd or abusive comments
- Deliberate exclusion from conversations
- Displaying abusive or offensive writing or material
- Abusive, threatening or insulting words or behaviour
- Name-calling
- Picking on someone or setting them up to fail
- Exclusion or victimisation
- Undermining their contribution/position
- Demanding a greater work output than is reasonably feasible
- Blocking promotion or other development/advancement

Sexual harassment can take many forms within the workplace and may go undetected for a period if employees do not recognise that certain behaviours are considered sexual harassment. Sexual harassment is unwanted behaviour of a sexual nature, or related to sex, by one employee towards another. Examples of sexual harassment include:

- Lewd or abusive comments of a sexual nature such as regarding an individual's appearance or body
- Unwelcome touching of a sexual nature
- Displaying sexually suggestive or sexually offensive writing or material
- Asking questions of a sexual nature
- Sexual propositions or advances, whether made in writing or verbally

If you experience or witness behaviour that falls within these definitions, you have a responsibility to report it using the mechanisms outlined in this policy.

3. Responsibilities

3.1 Employee responsibilities

Grace Foundation requires its employees to always behave appropriately and professional during the working day, and this may extend to events outside of working hours which are classed as work related such as social events. Employees should not engage in discriminatory, harassing or aggressive behaviour towards any other person at any time.

Any form of harassment or victimisation may lead to disciplinary action up to and including dismissal if it committed:

- In a work situation
- During any situation related to work, such as a social event
- Against a colleague or other person connected to the employer outside of a work situation, including on social media
- Against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role

3.2 Employer responsibilities

Grace Foundation will be responsible for ensuring all members of staff, including seniors and those within management positions, understand the rules and policies relating to the prevention of harassing and bullying behaviour at work and during work-related social events. We will promote a professional and positive workplace whereby managers are alert and proactively identify areas of risk and incidents of harassment, sexual harassment and bullying.

We will also consider aggravating factors, such as abuse of power over a more junior colleague, when deciding what disciplinary action to take.

Where an incident is witnessed, or a complaint is made under this policy, Grace Foundation will take prompt action to deal with this matter. All incidents will be deemed serious and treated in a sensitive and confidential manner.

4. Reporting Harassment

Employees have the right to complain if they are treated in a way that they believe constitutes harassment or bullying. Aside from complaints about the behaviour of colleagues, employees have the right to complain if they believe they have been bullied or harassed by a third party e.g. a client, a customer or supplier.

Employees who make a genuine complaint under this policy will not be subjected to any unfavourable treatment or victimisation because of making the complaint.

5. Procedure for Complaints

Any employee who believes that they have been subjected to harassment or bullying by another member of staff should raise the matter as soon as reasonably practicable.

Employees may raise a complaint either informally or formally. They should contact a member of the Grace Foundation Senior Team, the HR Department, or another manager if their immediate manager is unavailable or if the complaint involves that manager.

Before raising a formal complaint, the employee is encouraged to talk directly and informally to the person whom they believe is harassing him or her, using the informal procedure below. It may be that the person whose behaviour is causing offence is genuinely unaware that their behaviour is unwelcome or causing distress and that a direct approach can resolve the matter without the need to use the formal procedure.

A formal complaint can also be submitted via the IMG Third Party Speak Up Portal. Please follow this link to view the portal and submit your complaint online via [Third-Party Speak-Up Policy | IM Group](#)

If you witness or experience similar behaviour affecting another individual, please use the same reporting mechanisms outlined above to ensure that concerns are appropriately addressed.

5.1 Informal Procedure

If the employee feels able, they should speak up at the time when they feel harassed or bullied. It is important to be direct and for the employee to state explicitly that they feel they are being harassed and that the behaviour is unacceptable to them.

Alternatively, if the employee feels unable to speak to the harasser directly, they could write a letter or email to them which clearly identifies the offending behaviour and requests that it stops immediately. If the employee chooses to send a letter this should be dated and signed by them, and they should ensure that a copy of any correspondence is kept for any possible future formal complaint. It is also advisable that the employee keep an 'incident diary' of any offending behaviour.

We recognise that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for the employee to raise the issue through our normal grievance procedure. In these circumstances the employee is encouraged to raise such issues with a senior colleague of their choice (whether or not that person has a direct supervisory responsibility for them) as a confidential helper.

Where the informal procedure has not resolved an employee's complaint, a formal grievance can be raised by the employee.

5.2 Formal Procedure

An employee who feels that they have been subjected to harassment or bullying may at any time decide to deal with the issue through the formal procedures, using the partner school or IMG's grievance procedure, regardless of whether informal steps have been taken or not.

If possible, the employee should keep notes of the harassment so that the written complaint can include:

- The name of the person whose behaviour is believed to amount to bullying or harassment.
- The behaviour that is causing offence, with specific examples.
- Dates and times when incidents of harassment or bullying occurred.
- The names of any employees who witnessed any incidents.
- Details of any action the employee has taken to try and address the bullying/harassment.

Grace Foundation will investigate any informal or formal complaints thoroughly and fairly.

An employee accused of harassment or bullying will be informed of the exact nature of the complaint against them and given an opportunity to give their own version of events.

During the investigation, Grace Foundation reserves the right to suspend or temporarily redeploy either the employee making the complaint of harassment or bullying, or the employee suspected of harassment or bullying. Suspension will be on full pay and is not a disciplinary sanction. As soon as the investigation is complete, Grace Foundation will inform the employee suspected of bullying or harassment of the outcome and decide if it is appropriate to start disciplinary proceedings.

6. Consequences of Breach

Harassment is a disciplinary offence and will be dealt with according to IMG/Grace Foundation's Disciplinary procedure. Bullying, harassment, victimisation or discrimination may constitute gross misconduct punishable by summary dismissal without notice.

Employees should bear in mind that harassment or bullying may also constitute criminal offence punishable by a fine and/or imprisonment.

7. Confidentiality

Grace Foundation will treat any complaint received under this policy confidentially. All employees involved with an investigation are required to respect the need for confidentiality. Grace Foundation will maintain records of investigations into alleged incidents of harassment or bullying and the outcome of the investigations. These records will be maintained in confidence and in line with the Records Retention, Destruction and Archiving Policy. Any breaches in confidentiality will be subject to disciplinary action.

8. Review

This policy will be reviewed every **two years** or sooner if required by changes in legislation or operational needs.

This policy links to the IMG Grievance Policy which can be found [here](#).

This policy links to the IMG Whistleblowing Policy which can be found [here](#).

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