

TEDI-LONDON

STUDENT BULLYING AND HARASSMENT POLICY

Summary	This Policy outlines the support systems for students who are being bullied or harassed, gives information on how allegations should be raised, and explains how TEDI-London deals with allegations of Bullying and Harassment.		
Policy Owner	Assistant Registrar – Student Experience		
Policy Sponsor	Academic Board		
Policy applies to	All students of TEDI-London.		
Related legislation and policy	Equality Act 2010 TEDI-London Student Contract TEDI-London Student Complaints Policy TEDI-London Student Disciplinary Policy TEDI-London Equality, Diversity and Inclusion Policy		
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Contents

PART ONE: OVERVIEW	3
1. INTRODUCTION	3
2. POLICY STATEMENT.....	3
3. SCOPE	4
4. ROLES AND RESPONSIBILITIES	4
5. CONFIDENTIALITY	5
6. RISKS AND MITIGATION	6
7. IMPACT ASSESSMENT	6
8. REVIEW	6
PART TWO: DEFINITIONS	7
9. WHAT IS HARASSMENT?	7
10. WHAT IS BULLYING?.....	8
PART TWO: PROCESS.....	9
11. WHAT TO DO IF YOU ARE BEING BULLIED OR HARASSED	9
12. INFORMAL ROUTE	10
13. FORMAL ROUTE.....	10
14. WHAT IF YOU ARE ACCUSED OF BULLYING, HARASSMENT OR VICTIMISATION?	11
15. WHAT HAPPENS IF A COMPLAINT HAS BEEN MADE VEXATIOUSLY?	12
APPENDIX 1: HELPFUL CONTACTS/ EXTERNAL SUPPORT	13

PART ONE: OVERVIEW

1. INTRODUCTION

- 1.1. TEDI-London aims to operate an enabling environment where all students feel safe, respected, and can challenge inappropriate behaviours wherever they occur.
- 1.2. We aim to maintain transparent and robust mechanisms that allow students to raise concerns over harassment and bullying.
- 1.3. Our culture is based upon mutual respect, trust, and empowerment. Students should be able to study in a safe environment free from harassment, bullying or victimisation. This aligns with our values of being inclusive and working with integrity.
- 1.4. This policy promotes respectful treatment of students by staff and fellow students to protect them from bullying and harassment during their time at TEDI-London.
- 1.5. TEDI-London aims to ensure that cases of bullying and harassment are dealt with in a transparent, constructive, and consistent way, in accordance with the process outlined in this document.

2. POLICY STATEMENT

- 2.1. TEDI-London is committed to providing an inclusive environment. We have zero tolerance for bullying, discrimination, and harassment.
- 2.2. Our culture is based upon mutual respect, trust, and empowerment. We all have a responsibility to create and nurture an environment for work and study which is free from harassment, bullying, discrimination – unlawful or otherwise, and to protect staff and students from victimisation.
- 2.3. We encourage students to raise any concerns they may have about harassment, discrimination, or bullying. However, it is important to distinguish such incidents from other behaviour for example vigorous academic debate or where concerns are raised about your attendance and

academic performance.

- 2.4. Academic staff will raise any performance or conduct issues with you where improvement is needed. They will do this in a reasonable manner, designed to support and encourage you. Feedback given will be constructive.
- 2.5. We demonstrate our commitment to diversity and inclusion, and harassment and bullying by providing:
 - training and learning for staff face to face or online
 - clear values and associated ways of working and studying to support our developing culture
 - appropriate routes for staff and students to ensure their concerns are adequately addressed.

3. SCOPE

- 3.1. This policy applies to all students of TEDI-London. You agree to adhere to this policy upon signing your student contract.
- 3.2. This Policy should be used if you (the student) consider that you have been bullied or harassed by:
 - A member of staff
 - A student
 - A third party (such as a contractor or visiting lecturer/speaker)
- 3.3. This policy can also be applied to the way in which students behave towards fellow students and staff at TEDI-London related social occasions and online through social media networks.

4. ROLES AND RESPONSIBILITIES

- 4.1. All TEDI-London staff and students have a responsibility to:
 - ensure they comply with this policy
 - take a request to amend behaviour seriously and to respond courteously
 - not participate in, encourage, condone, or stand by if harassment, bullying or victimisation of others is taking place, and
 - challenge inappropriate behaviour.

- 4.2. Where a complaint of bullying or harassment is made by a student against a member of staff the matter will also be referred to the People Team where appropriate.
- 4.3. It is normally expected that a student who is experiencing bullying or harassment will raise a complaint themselves. However, where another student or member of staff becomes aware of bullying or harassment, they may raise a complaint. It does not matter that the person raising the complaint is not the person being bullied or harassed.
- 4.4. The Assistant Registrar – Student Experience is responsible for ensuring the currency and application of this policy.

5. CONFIDENTIALITY

- 5.1. Informal discussions as well as formal investigations will be kept confidential, although it will be necessary to share the information with certain parties who are directly involved such as the person against whom the complaint has been made and those interviewed as part of an investigation.
- 5.2. We have a duty to protect the confidentiality of all TEDI-London students and staff and therefore may not be able to release full information about outcomes of investigations with you, due to reasons of confidentiality.
- 5.3. We reserve the right to take forward an issue formally as an organisation if we deem it to be necessary to continue to foster a good work and study environment even if you have decided not to make a formal complaint.
- 5.4. We may be required to consult the police in cases of physical assaults or behaviour which may constitute a criminal offence.
- 5.5. Individuals who consider they are subject to inappropriate behaviour may seek advice from the Student Hub or other source of advice. You should not engage in gossip with other students or staff, as this may prejudice any future investigation and/or maintain good working relationships moving forward impossible.

- 5.6. We will collate information on the number of informal and formal complaints of bullying or harassment we receive and the outcomes for management purposes including continuous improvement in our approach.
- 5.7. You will be supported if you make a complaint about behaviour taking place towards someone else that you are aware of and may have observed and will not be victimised or suffer a detriment in doing so.

6. RISKS AND MITIGATION

- 6.1. We will provide training on themes relating to equality, diversity, and inclusion as part of induction for all staff and students as well as ongoing briefings and updates.
- 6.2. Training will also mitigate the potential legal and reputational risks that could arise from cases of bullying, harassment and victimisation occurring and not being dealt with appropriately.

7. IMPACT ASSESSMENT

- 7.1. This policy has been assessed as having a potentially high impact for students and employees – both those with protected characteristics defined in the Equality Act 2010 and without.

8. REVIEW

- 8.1. This policy will be reviewed every three years as well as when feedback is received in relation to the practical application of this policy.

PART TWO: DEFINITIONS

9. WHAT IS HARASSMENT?

- 9.1. Harassment is any unwanted physical, verbal, or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
- 9.2. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 9.3. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.
- 9.4. Harassment may include, for example:
- unwanted physical conduct or "horseplay", including touching, pinching, pushing, and grabbing
 - continued suggestions for social activity after it has been made clear that such suggestions are unwelcome
 - 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)
 - unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
 - racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about an ethnic or religious group or gender
 - outing or threatening to out someone as gay or lesbian
 - offensive e-mails, text messages or social media content; or
 - mocking, mimicking, or belittling a person's disability.
- 9.5. 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 the jokes create an offensive environment.

- 9.6. Another form of Harassment is Victimisation. Victimisation is where you are treated less favourably because you have complained (or intend to complain) about discrimination or harassment in the workplace, or because you have helped someone who has been discriminated against.

10. WHAT IS BULLYING?

- 10.1. 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.
- 10.2. Bullying can take the form of physical, verbal, and non-verbal conduct. Bullying may include, by way of example:
- physical or psychological threats
 - overbearing and intimidating levels of supervision
 - inappropriate derogatory remarks about someone's performance
- 10.3. Legitimate, reasonable, and constructive criticism of your performance or behaviour, or reasonable instructions given to you in relation to your study or work, will not amount to bullying on their own.

PART TWO: PROCESS

11. WHAT TO DO IF YOU ARE BEING BULLIED OR HARASSED

- 11.1. If you consider that you have been harassed, bullied, or received other unacceptable treatment from a member of the TEDI-London community, you should bring this to our attention through your Personal Tutor or the Student Experience Officer. Or if these members of staff are the alleged perpetrators, then to another member of the Academic Team or Registry.
- 11.2. At any stage you will be supported in your decisions including through our Student Hub Services and/ or you may wish to consult your General Practitioner (GP).
- 11.3. The matter should normally be raised without unreasonable delay, i.e. as soon as it occurs, or comes to light or within three months of the most recent episode.
- 11.4. Many issues can be resolved informally, using techniques such as mediation, this approach is encouraged wherever possible.
- 11.5. You are encouraged if you feel uncomfortable with behaviour – verbal or physical to take a note of the time, venue and location and the details of what has been said or done as soon as you can after the event(s).
- 11.6. Keep a diary if behaviour has been ongoing and your thoughts / impact, who you have shared the detail and when and any changes you have felt you had to make to mitigate the impact
- 11.7. You could talk directly to the individual(s) or put it in writing. You should keep a copy of note of what has been said or sent for future reference should it be required.
- 11.8. If you feel able to raise this directly with the individual, use the EEC acronym –
 - **E**xplain what they have done or said,
 - **E**ffect - what the effect was on you
 - **C**hange – what you would like to see change

- 11.9. If you are not able to have this conversation yourself, you should speak to your Personal Tutor or Student Experience Officer who will facilitate the conversation on your behalf, following the process outlined in the Informal Route section below.

12. INFORMAL ROUTE

- 12.1. We can facilitate a conversation between you and the alleged perpetrator. This is known as a **Bullying and Harassment meeting**.
- 12.2. The Bullying and Harassment meeting is informal and confidential. It is an opportunity for all parties to discuss the situation in a facilitated conversation with a TEDI-London member of staff who has been trained to facilitate such conversations, or an external mediator. Notes will be taken to make sure that there is a thorough record of all meetings.
- 12.3. Those participating in a Bullying and Harassment meeting may contact the King's College London Students' Union (KCLSU) for guidance and may be accompanied at the meeting by an adviser from KCLSU or by a friend/supporter of their choice (such person may not attend in a legal capacity).
- 12.4. All parties present at the Bullying and Harassment meeting will be advised of the outcome of the meeting in writing, including any actions to be taken following the meeting.
- 12.5. All allegations are taken seriously, and we want to enable relationships to move forward positively where this is possible.
- 12.6. We may suggest that the two parties work away from each other, but we acknowledge that this might not always be possible. In group work for example, both parties may need to be separated in a sensitive manner.

13. FORMAL ROUTE

- 13.1. There are some instances where you might want to make a formal allegation. This might be:

- where matters cannot be resolved informally,
- if you are dissatisfied with the outcome of the informal stage, or
- if the behaviour continues.

13.2. You can elect not to follow the informal route and to pursue a formal route only.

13.3. We deal with formal bullying and harassment allegations via our [Student Discipline Policy](#). We will investigate all allegations and will take formal action where appropriate, in line with the Student Discipline Policy.

13.4. In some cases where concerns have come to the attention of members of staff or students, we may decide to take formal action even where an individual is themselves unwilling to pursue the matter formally. In such cases the student(s) concerned will be informed of this.

14. WHAT IF YOU ARE ACCUSED OF BULLYING, HARASSMENT OR VICTIMISATION?

14.1. We recognise that a complaint made about you such as bullying, harassment or victimisation is difficult and can be stressful and/ or distressing.

14.2. We are committed to treating all allegations seriously and objectively. We will ensure that remedial or other action is taken as appropriate.

14.3. We will ensure the procedure enables all parties to be treated in line with the rules of natural justice:

- what the actual complaint is about
- that you have an opportunity to be accompanied to any meetings under this and related policies
- that you can put forward your point of view at every stage and to be heard objectively

14.4. Support is available for you throughout informal or formal stages including Counselling and Mental Health and/or Kings College London Students' Union. Your behaviour may have been received as harassment or bullying even if you did not intend to cause offence or you consider the other party

is being oversensitive.

- 14.5. You are asked to remember that being open to and prepared to accept feedback and offering a heartfelt apology may be a resolution depending on the circumstances and the view of the complainant

15. WHAT HAPPENS IF A COMPLAINT HAS BEEN MADE VEXATIOUSLY?

- 15.1. In many cases of potential bullying and harassment cases, there are two conflicting views of the same events which must be considered.
- 15.2. If you have submitted a complaint in good faith, you will not suffer a detriment as a result of raising a complaint, even if it is not upheld.
- 15.3. However, in the rare event and (on the balance of probabilities) it is concluded by the investigating manager that a complaint was raised in bad faith, the complaint may be used as a basis for taking disciplinary action against the complainant.

APPENDIX 1: HELPFUL CONTACTS/ EXTERNAL SUPPORT

- [National Bullying Helpline](#) for practical support to anyone who is experiencing bullying. Call 0845 22 55 787, 9am - 5pm Monday to Friday.
- [Victim Support](#) help anyone who has been the victim of a crime. They can support you coping with the after-effects of crime and help with reporting to the police.
- Contact the Student Hub to access any of our Wellbeing Services such as Counselling: studenthub@tedi-london.ac.uk