

INTERNAL PROCEDURE

Title: Anti-Bullying & Harassment

POLICY HOLDER: Library and Wellbeing Manager

APPROVAL BOARD: College Leadership Team

VERSION NO: 14

LAST REVIEWED: August 2026

REVIEW PERIOD¹: 1 Year

¹ The Review Period refers to our internal policy review process. The published policy is current and is the most recent approved version.

Summary: Sets out the College's general procedure statement on anti-bullying and harassment with guidelines for Staff and Students and on the reporting of bullying and harassment breaches.

Accessibility: If you would like this information in an alternative format, e.g. Easy to Read, large print, Braille or audio tape, or if you would like the procedure explained to you in your language, please contact the College's marketing team on 01603 773 169.

Further information: If you have any queries about this policy or procedure, please contact the named policy holder.

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Amendments log

Date	Version No	Reason for Change	Author	Approved By
February 2014	2	Annual Update	Sharon Farrant	Helen Richardson-Hulme
February 2015	3	Annual Update	AMT	Helen R-H
February 2016	4	Annual Update	Jock Downie	Helen R-H AMB
February 2017	5	Annual Update and Review	Jock D	Helen R-H Exec
September 2017	6	Banter	Helen R-H	Exec
August 2018	7	Annual Update	Jock Downie	Helen R-H Exec
August 2019	8	Annual update and review Removed legal references section in appendix 6 and linked to student disciplinary and safeguarding and behaviour.	Alex Wallace	Helen HRH Exec
August 2020	9	Annual Update - Site specific references updated (page 9). Date references updated.	Alex W	Helen R-H
October 2020	10	Update to definition of informal bullying	CMT	Helen R-H
August 2021	10	Annual update - No changes	Helen R-H	SMT
August 2022	11	Annual update – amendment of point 2.3	Alex W	Helen R-H SMT
August 2024	12	Annual update – Addition of point 8 <i>Support for staff facing bullying or harassment by students.</i>	Samara Castro	Helen R-H
August 2025	13	Annual updates throughout to reference links to the Positive Student Engagement Procedure, including updated reference to the new Student IT Conditions of Use guidance, also added definition of sexual harassment. Updated DSLs throughout.	Samara C	Helen R-H
August 2026	14	Annual update. - Restructured policy & streamlined repeated points. -Updates & additions to definitions & reporting of	Samara C	Helen R-H

		sexual harassment & sexual violence. -Changes to responses. -Edit to Roles & responsibilities. (Any new DSLs to be added for 2627) -Edit to complaints against staff. -Edit to reporting. -Removal of appendix 1 & 3 – now written into procedure.		
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Staff and Student Involvement in Procedure Development

Staff and students have contributed to the review of this procedure through consultation with the College Management Team, the Students' Union, and staff working in cross-college support roles.

Staff are encouraged to raise any concerns relating to the procedure for managing bullying and harassment with the Vice Principal, Safeguarding, Inclusion and Student Services, and there is an ongoing opportunity for discussion and feedback regarding the effectiveness of this procedure.

This procedure is reviewed annually, with due consideration given to its effectiveness and any implications for future whole-college development planning.

The procedure will be updated as required to reflect the adoption of new technologies, changes in legislation, or amendments to government guidance.

This procedure is reviewed, amended where necessary, and approved annually by the Senior Management Team.

Any suggested amendments to this procedure must be approved by the custodian who is Samara Castro, Library and Wellbeing Manager. All amendments must be approved by the Vice Principal, Safeguarding, Inclusion and Student Services.

1.College Ethos in relation to Bullying and Harassment

City College Norwich's Anti-Bullying and Harassment Procedure reflects national policy developments and should be read alongside the College's Safeguarding Procedure and other related policies.

The College is committed to providing a safe, inclusive and respectful environment in which all members of the College community can learn, work and socialise free from bullying and harassment. The College adopts a zero-tolerance approach to bullying and harassment and recognises the significant impact such behaviours can have on an individual's wellbeing, safety, dignity and ability to achieve their full potential.

All staff have a responsibility to promote a positive and supportive learning environment and to respond appropriately to concerns or incidents of bullying and harassment.

This procedure supports the College's safeguarding responsibilities and should be read in conjunction with the following policies and procedures:

- Student Engagement Procedure
- Conditions of Use of IT Systems
- Safeguarding Children and Vulnerable Adults Procedure
- Data Protection Compliance Policy
- Information Security Procedure
- Health and Safety Policy
- eSafety Procedure
- Web-Based Services, Sites and Applications

The College is committed to fostering a culture in which concerns can be raised openly and addressed promptly, fairly and consistently. All forms of bullying and harassment, including online, digital and technology-enabled behaviours, will be taken seriously and managed in accordance with this procedure and, where appropriate, the Student Engagement Procedure and associated disciplinary processes.

The College recognises that some individuals may not feel comfortable raising concerns in person and is committed to ensuring that reporting mechanisms are accessible, safe and supportive. Students, parents, carers and other members of the College community can report concerns relating to bullying or harassment through a range of channels, including by email at **stopbullying@ccn.ac.uk**.

Concerns relating to Sexual Harassment or Sexual Violence

All concerns relating to sexual harassment or sexual violence must be reported to the Safeguarding Team without delay. This is so that, alongside dealing with the matter within our Student engagement and disciplinary procedures, we maintain a safeguarding lens for all concerns and a Designated Safeguarding

Lead can review all cases and monitor actions being taken to address cases where gender-based harassment occurs such as misogyny or misandry.

Reports of sexual harassment will be subject to an initial safeguarding assessment to determine the level of risk, identify any immediate support needs, and establish whether further action is required under college policies and procedures, including this Anti-Bullying and Harassment Procedure.

Reports involving sexual violence will be managed in accordance with the College's Safeguarding Policy and may also involve referral to external agencies where appropriate. The College will ensure that all individuals involved are provided with appropriate support, safeguarding measures and access to relevant services throughout the process.

AI and non-AI generated Child Sexual Abuse Material

Included for information in Appendix 3 is the college's response to cases where there is an allegation of on-line harm.

2.Roles and Responsibilities

2.1 The Senior Management Team (SMT) has overall responsibility for ensuring that this procedure is effectively implemented, embedded across the College, and regularly monitored. The prevention of bullying and harassment forms an important part of the College's strategic leadership and safeguarding responsibilities. SMT and Governors receive regular updates from the Designated Safeguarding Leads (DSLs) to ensure that they remain informed of emerging issues, trends, and the College's response in line with local and national guidance and best practice.

2.2 The College's Designated Safeguarding Leads are Jen Eves, Seb Gasse, Helen Richardson-Hulme, Mat Scott, Chris Caddamy and Jacky Sturman, all of whom are members of the Senior Management Team. All members of the College community are made aware of the Designated Safeguarding Leads and how to access support and advice.

2.3 Heads of Area are responsible for ensuring that bullying and harassment incidents are dealt with appropriately, accurately recorded and monitored within their areas. Termly data, including the nature of incidents and relevant demographic information such as age, gender and level of study, will be collated and submitted to the Vice Principal, Safeguarding, Inclusion and Student Services. This information will be used to identify patterns, inform preventative measures, and support reporting to the Senior Management Team and College Governors. Incidents should be recorded using the College's approved recording processes and documentation.

2.4 The Vice Principal, Safeguarding, Inclusion and Student Services will oversee the monitoring of bullying and harassment concerns reported to the College,

including regular review of the stopbullying@ccn.ac.uk mailbox and will ensure that appropriate actions are taken in accordance with this procedure.

2.5 All staff have a responsibility to remain vigilant to signs and indicators of bullying or harassment and must take all concerns seriously. Staff should recognise the significant impact that bullying and harassment can have on a student's wellbeing, safety, personal development and educational outcomes if not identified and addressed promptly.

2.6 All staff must listen to any disclosure or report of bullying or harassment with sensitivity, professionalism and respect, and take appropriate action in accordance with this procedure and relevant safeguarding requirements.

3. Definitions

Bullying

Bullying is behaviour that intentionally causes physical or emotional harm and involves the misuse of power, influence or position, leaving the individual feeling hurt, upset, vulnerable, isolated or powerless. Bullying is typically characterised by a pattern of repeated behaviour over time, although a single serious incident may be managed under this procedure where the impact on the individual is significant.

Bullying may be verbal, physical, emotional, social or psychological in nature.

Examples of bullying include:

- Derogatory remarks, name-calling, taunting, mocking or humiliating comments
- Inappropriate or offensive "banter"
- Insensitive jokes or pranks
- Physical aggression, including kicking, hitting, pushing or damaging property
- Taking or hiding personal belongings
- Deliberately ignoring, excluding or isolating an individual
- Spreading gossip, rumours or false information
- Intimidating, threatening or coercive behaviour

Harassment

Harassment is unwanted conduct that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment is unlawful under the Equality Act 2010 when it relates to a protected characteristic.

Protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity

- Race
- Religion or belief
- Sex
- Sexual orientation

Harassment by association occurs when a person experiences harassment because of their association with someone who possesses a protected characteristic.

Harassment by perception occurs when a person is harassed because they are perceived to have a protected characteristic, regardless of whether that perception is correct.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment can occur in person, online or through the use of technology.

Examples include:

- Sexual comments, remarks or innuendo
- Sexually offensive jokes, teasing or taunting
- Unwanted sexual advances
- Comments about a person's appearance, body or clothing of a sexual nature
- Deliberately brushing against someone or unnecessary physical contact
- Interfering with another person's clothing
- Displaying, sharing or distributing sexually explicit images, photographs or drawings
- Upskirting, which is a criminal offence
- Sharing or requesting nudes or semi-nudes, whether consensually or non-consensually
- Sending unwanted sexual messages, images or content online
- Sexual coercion, exploitation, threats or intimidation
- Pressuring another person to share images, videos or undertake sexual acts

Sexual Violence

Sexual violence refers to sexual offences as defined by the Sexual Offences Act 2003. Sexual violence includes:

- Rape
- Assault by penetration
- Sexual assault
- Causing a person to engage in sexual activity without consent
- All reports of sexual violence will be managed in accordance with the College's Safeguarding Policy and Procedure.

Cyberbullying

Cyberbullying is bullying or harassment carried out through digital technologies, including social media platforms, messaging services, gaming platforms, websites, email and mobile devices. Cyberbullying can occur at any time and may have a significant and enduring impact due to the speed and reach with which content can be shared.

Examples include:

- Sending abusive, intimidating or threatening messages
- Spreading malicious rumours or false information online
- Deliberately excluding individuals from online groups or activities
- Online harassment or repeated unwanted contact
- Cyberstalking
- Blackmail, coercion or intimidation
- Creating fake or impersonation profiles
- Sharing embarrassing, humiliating or private images without consent
- Recording or distributing images, videos or audio without permission
- Online fraud, deception or identity misuse

The College recognises that bullying and harassment may occur both on and off campus, including through digital platforms and social media. Where behaviour has an impact on a member of the College community or affects the safety, wellbeing or learning environment of students, the College may investigate and take action regardless of where the incident took place.

Banter

The College recognises that the term "banter" is sometimes used to describe humour, teasing or exchanges between individuals who perceive the interaction to be friendly and mutual. However, language or behaviour described as banter can become bullying or harassment where it causes offence, distress, humiliation or harm.

The College does not accept "banter", "just joking" or similar explanations as a defence for behaviour that negatively impacts another person.

Staff receive safeguarding and conduct training to help them:

- Recognise when banter may be masking bullying, harassment or discrimination
- Understand the impact that seemingly casual comments or jokes can have on others
- Challenge inappropriate language and behaviour consistently
- Promote a respectful and inclusive learning environment
- Support students to develop positive behaviours that reflect the College's Ways of Working and prepare them for life and work beyond College

3.1 General considerations

Not all conflict; disagreement or interpersonal difficulties constitute bullying or harassment. Differences of opinion, occasional disputes, or isolated incidents between individuals will not normally be considered bullying or harassment unless they are serious in nature, targeted towards an individual, or form part of a repeated pattern of behaviour.

Bullying is often a subjective experience and can take many forms. What one person may perceive as teasing or banter may be experienced by another as hurtful, intimidating or distressing. For this reason, the impact of the behaviour on the individual concerned will always be taken into account when assessing concerns.

Bullying and harassment can be perpetrated by children, young people or adults and may occur in person or through digital and online platforms. The College recognises that the nature of bullying is continually evolving as technology develops, creating new opportunities for harmful behaviour to occur both within and beyond the College environment. Consequently, the College remains committed to responding effectively to all forms of bullying and harassment and promoting a culture of dignity, respect and inclusion.

4. Procedure for dealing with instances of Bullying and Harassment

4.1 Allegations, complaints and concerns

Any allegation, complaint or concern relating to bullying or harassment will be taken seriously and addressed promptly in accordance with this procedure.

Concerns may be raised directly by a student, by a member of staff on behalf of a student or identified through a member of staff witnessing or becoming aware of behaviour that may constitute bullying or harassment.

When assessing whether behaviour constitutes bullying or harassment, consideration will be given to the impact of the behaviour on the individual concerned. The perception and experience of the person affected will be taken into account, recognising that it is the effect of the behaviour, rather than the intention behind it, that is most significant.

Where a student reports bullying or harassment but requests that no action be taken, staff must explain that the College has a duty of care to respond to all reports of bullying and harassment. Concerns cannot be ignored and appropriate action will always be taken in line with this procedure, while seeking to respect the student's wishes and involving them in decisions wherever possible.

4.2 Recording and Reporting Instances

Any member of staff who receives a complaint, witnesses an incident, or becomes aware of potential bullying or harassment must notify the relevant Course Leader or Tutor as soon as possible. The concern should then be managed in accordance with the informal or formal response processes outlined within this procedure.

Where concerns are reported via **stopbullying@ccn.ac.uk**, the student's **Head of Area** will be notified and will be responsible for ensuring that appropriate support, monitoring and any necessary follow-up actions are put in place. Students and staff may use the incident recording template provided in **Appendix 2** to maintain a record or timeline of incidents and associated concerns.

When to Refer to Safeguarding

Where a member of staff becomes aware that a student is experiencing or perpetrating repeated bullying, harassment, or behaviour that raises safeguarding concerns, and there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a safeguarding concern must be raised immediately via the College's **Red Button Safeguarding Referral** process.

All safeguarding referrals will be subject to an initial safeguarding assessment to determine the level of risk, identify any immediate support needs, and establish whether further action is required under college safeguarding procedures or this Anti-Bullying and Harassment Procedure.

4.3 Informal Response

An informal response may be appropriate where a complaint, allegation or witnessed incident indicates that the behaviour is isolated, low-level, unintentional, or capable of being resolved through early intervention.

The aim of an informal response is to address inappropriate behaviour promptly, minimise disruption to learning, and prevent escalation into more serious or repeated incidents.

The Course Leader, Tutor or Lecturer should meet with the student(s) concerned and clearly explain that the behaviour is unacceptable.

The discussion should:

- Identify the behaviour that has caused concern.
- Explain why the behaviour is inappropriate.
- Outline the standards of behaviour expected in future.
- Make clear that the behaviour will be monitored and that further incidents may result in formal action being taken.

When addressing concerns, staff should focus on the **impact** of the behaviour on the individual rather than the intention behind it. This is particularly important when managing behaviour described as "banter", which may nevertheless constitute bullying or harassment.

A record of the discussion and any agreed actions must be recorded on the student's **Individual Learning Plan (ILP)**. Where the member of staff managing the matter does not have access to the ILP, a summary of the incident and actions taken must be provided to the relevant Course Leader for recording.

An example of a **Bullying and Harassment Incident Record (Template 1)** may be completed and submitted to the Head of Area for monitoring and reporting purposes;

however the college recognises that reports of bullying and harassment may come through in a variety of different ways.

Any member of staff who witnesses, receives a report of, or becomes aware of bullying or harassment must share relevant information with appropriate colleagues to support effective intervention, monitoring and safeguarding.

Where multiple students are involved and have different tutors or course teams, those staff members should liaise to ensure a consistent and coordinated approach.

4.4 Formal Response

A formal response may be required where a complaint, allegation or witnessed incident indicates that the behaviour is deliberate, repeated, serious in nature, discriminatory, or has not been resolved through informal intervention.

A formal response may also be appropriate for serious one-off incidents where the impact on the individual is significant, even if the incident does not meet the definition of bullying or harassment.

The purpose of a formal response is to investigate the circumstances, safeguard those affected, address unacceptable behaviour, and prevent further occurrences.

Formal cases should be managed as follows:

The matter must be referred immediately to the student's **Head of Area**. A written summary of the incident, including details of those involved and any action taken to date, must be provided.

The Head of Area will undertake, or appoint an appropriate manager to undertake, an investigation. The investigation will consider all available evidence and seek the views of those involved.

Separate meetings will normally be held with:

- The complainant.
- The alleged perpetrator.
- Any relevant witnesses.

Individuals participating in the process may be accompanied by a parent/carer, friend, supporter or member of staff where appropriate.

A written record will be made of all meetings and participants will be given the opportunity to confirm that the notes accurately reflect the discussion.

Confidentiality will be maintained throughout the process wherever possible. All parties will be reminded of the importance of respecting the confidentiality of those involved.

Investigations should normally be concluded within **four weeks** of the complaint being received. Where this is not possible, those involved should be kept informed of progress and the reasons for any delay.

Following completion of the investigation, the Investigating Manager will review the evidence and determine whether the allegation is substantiated.

All parties will be informed of the outcome and provided with written confirmation of the findings.

Where bullying or harassment is found to have occurred, the matter will be addressed in accordance with the **Student Engagement Procedure** and associated disciplinary processes.

The Investigating Manager must maintain a comprehensive written record of the investigation, findings, decisions and actions taken. All subsequent interventions, meetings and outcomes must be recorded on the relevant student's ILP.

Where an incident may constitute a criminal offence, the College may refer the matter to the police. The College will support any student who wishes to make a report to the police and will continue to provide appropriate safeguarding and welfare support throughout the process.

Student disciplinary process definitions are clearly set out in the Student Engagement Procedure:

Gross Misconduct

Involvement in actions which are unlawful, or which directly threaten the learning, rights, well-being, safety and/or security of persons rightfully using the College, or which threatens the well-being, safety and/or security of private or College property. Attitudes, behaviours, or actions which have the potential to bring the college into disrepute.

- Serious or persistent failure to comply with the Colleges rules and regulations, including Health and Safety rules.
- Physical or verbal assault or intimidation whilst on college premises or College related activities.
- Harassment or bullying including online and AI generated
- Threatening, offensive or indecent behaviour language including gender-based slurs e.g. misogyny or misandry
- Sexual misconduct, relating to all unwanted conduct of a sexual nature.
- Possession of and/or intent to supply controlled drugs or alcohol.
- Possession of items which may be deemed to be weapons.
- Causing deliberate harm and or distress to animals.
- Vandalism and/or destruction of property
- Theft
- Abuse or misuse of computer equipment and IT systems
- Infringement of the College Equality and Diversity Procedures
- Photographing, video recording and or audio recording of staff or students without their consent
- Behaviour which brings the College into disrepute
- Multiple or repeated instances of misconduct.

This list is not exhaustive.

5. Support for Students

The Wellbeing Team can provide support to students involved in bullying or harassment, whether as the person experiencing the behaviour or as the person responsible for it. Support may include counselling, wellbeing interventions, practical advice and education on the effects of bullying and harassment and practical advice on managing online bullying and harassment, including the use of social media, messaging platforms and mobile devices.

Where appropriate, the Wellbeing Team can facilitate restorative conversations or mediation between students to help resolve concerns and promote positive relationships. Referrals to facilitated conversations can be made via the [Student Services – Supportive Interventions](#) page on SharePoint.

6.Complaints against a Member of Staff

Any accusation of bullying or harassment from staff member to student should immediately be referred to that staff member's Line Manager who will investigate and take advice from HR if it is necessary.

7.Support for Staff Facing Bullying or Harassment by Students

Any member of staff who believes they are experiencing bullying or harassment by a student must report the concern to their line manager and the student's Head of Area. The Head of Area will investigate the matter in accordance with section 3 of this procedure. Line managers will provide appropriate support to staff affected by bullying or harassment, supported by HR if appropriate.

8.Recording

The College will provide termly reports to the Senior Leadership Team (SLT) and College Governors on the number of bullying allegations managed through the safeguarding team. Reports will include anonymised information on the gender, age, and level of study of those involved.

Appendix 1 – Example record of a bullying/harassment allegation

Student name	
Student number	
Area	
Report completed by	
Allegation/incident	
Parents/carers contacted	Notes:
Incident logged on ILP	Yes/No
Lead staff investigating	
Head of Area or Course Leader informed	Confirm Yes
Other actions taken	
Date	

Appendix 2 – Record of bullying incidents

Keeping a record about the bullying you've experienced can be really helpful then you are talking to your lecturer or another adult about how to sort it out. Try to remember and write down as much as you can about what happened, when and where the bullying took place, and who was involved. You can show this sheet to an adult you trust or just use it to remind you when you are talking to them about what happened.

Date & time	What happened? <i>What was said or done to you?</i>	Who was involved in the bullying? <i>Their names – or a description if you don't know them</i>	Where did the bullying take place? <i>For example, at college or on the bus</i>	Was anything taken? <i>For example, your phone or money</i>	Was anyone with you or did anyone else see what happened?

Appendix 3 AI and non-AI generated Child Sexual Abuse Material

