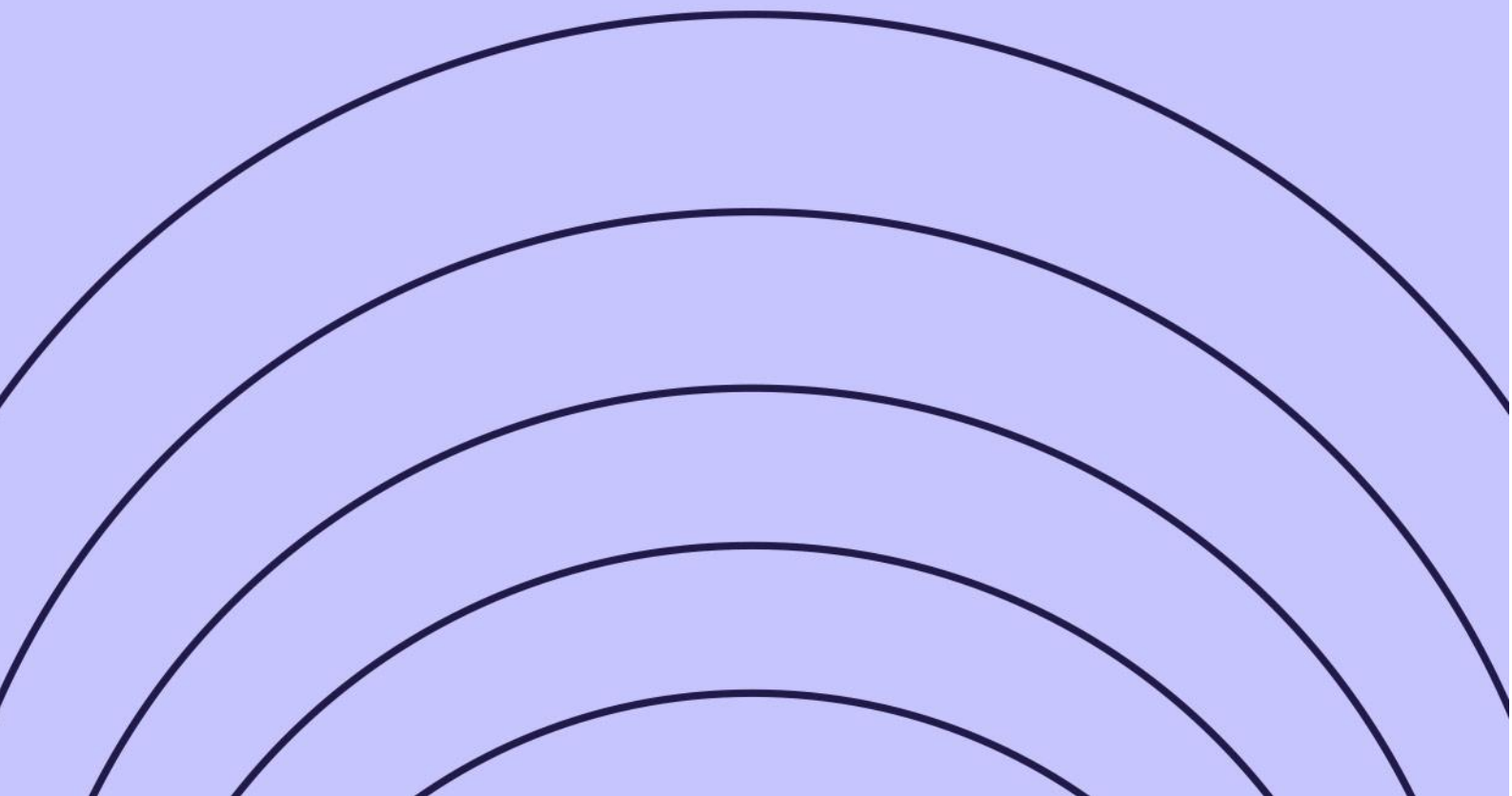




# **Pearson TQ Apprenticeships Bullying and Harassment Policy**

Policy Version No 1.0 / 20th January 2026 / PTQ-029



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# Policy statement

Pearson TQ (PTQ) are committed to providing a safe, respectful and inclusive environment for apprentices, learners, staff, visitors, subcontractors and employer partners. We operate a zero-tolerance approach to bullying, harassment, victimisation and discrimination in any setting connected to our provision (including training venues, workplaces, online learning and assessments).

We will:

- Take all concerns seriously, respond promptly and fairly, and act to stop unacceptable behaviour.
- Protect the wellbeing and safety of those affected and anyone at risk.
- Maintain confidentiality as far as possible and in line with our safeguarding duties.
- Not tolerate retaliation against anyone who raises a concern in good faith.
- Harassment related to a protected characteristic is unlawful under the Equality Act 2010 and employers have responsibilities to prevent and address harassment at work.

## Scope

This policy applies to:

- All apprentices and learners on programmes we deliver (regardless of age),
- All staff, associates, trainers, assessors, volunteers and subcontractors,
- Employer/host employer staff involved in the apprentice's employment/training,
- Anyone interacting with our learners in connection with our services (including online).

This policy covers incidents occurring:

- At the workplace or training centre
- During assessments, reviews, visits or events linked to the programme
- Online/digitally (email, messaging apps, social media, VLE platforms).

## Definitions and examples

### Bullying

Bullying is behaviour that makes someone feel intimidated, humiliated or undermined. It may be a one-off incident or a pattern of behaviour. Examples include: spreading malicious rumours, unfair treatment, picking on or regularly undermining someone, or denying training opportunities.

## Harassment

Harassment is unwanted behaviour related to a protected characteristic (e.g., age, disability, sex, race, religion or belief, sexual orientation, gender reassignment, etc.) that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Harassment is unlawful under the Equality Act 2010.

## Victimisation

Victimisation is treating someone unfairly because they made, or supported, a complaint or concern under this policy, or are suspected of doing so.

## Abuse / safeguarding concerns

Bullying or harassment may also be a safeguarding concern, particularly where the learner is under 18, an adult at risk, or where there are threats, coercion, controlling behaviour, exploitation, hate incidents, serious mental health impacts, self-harm risk, or criminal conduct.

## Roles and responsibilities

### Everyone

All apprentices, learners, staff and employer partners must:

- Treat others with dignity and respect
- Challenge unacceptable behaviour (when safe to do so)
- Report concerns promptly (including where they witness behaviour).

### Pearson TQ (the training provider)

We will:

- Promote a respectful culture and clear standards of behaviour
- Provide accessible reporting routes and timely responses
- Work with employers to address workplace issues affecting apprentices
- Consider whether a concern meets the threshold for safeguarding referral and act accordingly
- Maintain appropriate records and monitor trends.

### Employer partners

Employers are expected to:

- Provide a learning and working environment free from bullying and harassment

- Cooperate with investigations and implement actions within the workplace
- Use their internal disciplinary/grievance procedures where appropriate.

## Designated Safeguarding Lead (DSL)

The DSL (or deputy DSL) will:

- Receive and triage concerns that may be safeguarding-related
- Decide on referrals to relevant agencies where required
- Coordinate support for the learner and liaise with the employer and other services as appropriate.

## Preventing bullying and harassment

We will:

- Explain expected behaviours during induction (including online conduct)
- Provide staff training on recognising and responding to concerns
- Encourage early, informal resolution where appropriate and safe
- Ensure learners know how to report concerns and access support.

## Reporting concerns (how to raise an issue)

### If you are in immediate danger

- Call 999 (emergency) or 101 (non-emergency police).
- If on employer premises, follow the employer's emergency procedures.

### Reporting to us (preferred routes)

You can report bullying/harassment to:

- Your trainer/assessor/skills coach
- The Designated Safeguarding Lead (DSL) / Deputy DSL
- Quality/HR (if the concern relates to a staff member)
- Whistleblowing route (if you feel unable to use other routes)

### Reporting to your employer

If the incident happens in the workplace, you can also report to:

- Your line manager/supervisor
- Employer HR, apprentice mentor, or safeguarding contact.

We can support you to report to your employer if you prefer not to do so alone.

## What information to include when reporting

Where possible, include:

- What happened (facts), when and where
- Names of those involved and any witnesses
- Any evidence (emails, messages, screenshots)
- What impact it has had
- What you want to happen next
- Whether you feel safe right now.

## What happens after a report is made (our process)

### Step 1 – Acknowledge and triage (within 2 working days)

We will:

- Acknowledge receipt
- Assess immediate risk (including safety, mental health, safeguarding)
- Decide whether urgent action is needed (e.g., safe working arrangements).

### Step 2 – Provide support and safety measures (immediately where needed)

Support may include:

- A named contact person
- Adjustments to training/review arrangements
- Liaison with employer for temporary changes (e.g., alternative supervisor, different shift/team, different location)
- Signposting to wellbeing/mental health support, union representation (if applicable), or independent advice.

### Step 3 – Decide the appropriate route (informal / formal / safeguarding)

We will determine whether the concern should be handled:

- Informally (where appropriate, safe, and desired), e.g., facilitated conversation/mediation, agreed behaviour standards; or
- Formally via investigation; and/or
- As a safeguarding referral, if thresholds are met (e.g., under 18, adult at risk, significant harm risk, coercion, exploitation, hate incidents, serious threats).

### Step 4 – Investigation (normally within 20 working days, depending on complexity)

A trained manager (not directly involved) will:

- Gather accounts from the complainant, alleged perpetrator, and witnesses
- Review evidence (messages, CCTV where available, learning logs)
- Liaise with employer HR where the issue is workplace-based
- Keep parties updated on progress.

## Step 5 – Outcome and actions

We will confirm the outcome in writing (subject to confidentiality constraints) and implement actions.

## Actions we may take (examples)

### Where concerns are substantiated (or partially substantiated)

Actions may include:

- A formal instruction to stop the behaviour and comply with conduct standards
- Training/coaching on respectful behaviour and equality
- Increased supervision/monitoring
- Changes to working/training arrangements
- Employer-led disciplinary action (where the perpetrator is employer staff or another apprentice employed by the employer)
- Provider-led disciplinary action (where the perpetrator is our staff)
- Restrictions on contact, removal from certain activities, or suspension from programme pending investigation
- Termination of workplace arrangement (in severe cases)
- Referral to police where a crime may have occurred.

### Where concerns are not substantiated

We may still:

- Take steps to rebuild a safe learning environment
- Offer support to those involved
- Monitor the situation and review risk
- Consider whether there are wider cultural/management issues at the workplace.

### If the complaint is found to be malicious

If evidence shows a deliberately false allegation was made maliciously, we may take disciplinary action. (A complaint made in good faith that is not upheld will not be treated as malicious.)

## Safeguarding escalation

Bullying/harassment may trigger safeguarding actions. We will consider referral to:

- Children's social care (for under 18s)
- Adult safeguarding (for adults at risk)
- Prevent-related processes where relevant (managed under our safeguarding framework).

## Confidentiality, information sharing and data protection

We will handle reports sensitively and share information only with those who need to know to manage risk, investigate, and meet legal/safeguarding duties. Records will be kept securely in line with data protection requirements.

## Protection from retaliation

We will not tolerate threats, intimidation or retaliation against anyone who reports or supports a concern. Any retaliation will be treated as a serious disciplinary matter.

## Recording, monitoring and quality improvement

We will:

- Record all reports and outcomes
- Review trends to improve learner safety and culture
- Use learning from incidents to strengthen training, employer engagement and risk management.

## Related policies and documents

- PTQ Apprenticeships Safeguarding Policy
- PTQ Apprenticeships Extremism & Radicalisation Policy
- PTQ Apprenticeships Equality and Inclusion Policy
- PTQ Apprenticeships Learner Code of Conduct
- PTQ Apprenticeships Complaints Policy
- PTQ Apprenticeships Whistleblowing Policy
- PTQ Apprenticeships Online Safety / Acceptable Use Policy

## External support (England)

- [ACAS advice](#) and helpline (0300 123 1100)

- Police: 999 (emergency) / 101 (non-emergency)
- Samaritans: 116 123 (24/7)
- NSPCC (under 18s): 0808 800 5000

## Review of the Policy and Procedure

The Policy will be reviewed annually by Pearson TQ’s Senior Management Team to ensure it is still valid and reflective of current best practice.

## Document Version History

Version No	Date Revised	Revision Description	Revised By	Approved By
1.0	20/01/2026	New policy created	Neil Saunders	Martyn Leader