



Harassment, Antibullying and Sexual Misconduct Policy

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1. Introduction

The Maria Montessori Institute (MMI) is committed to creating and maintaining an environment that is free from harassment and bullying for all individuals associated with our organisation, including school staff, teacher trainers, trainees, students, volunteers, contractors, and visitors. We expect everyone to treat others with dignity, respect, and professionalism at all times.

This policy applies not only within the workplace but also in any work-related or learning-related setting, such as training sessions, school activities, business trips, conferences, social functions, and events organised by MMI.

Bullying and harassment are behaviours that make someone feel intimidated, humiliated, or offended. Harassment is unlawful under the Equality Act 2010, which protects individuals against discrimination in work and training environments.

MMI operates a zero-tolerance approach to bullying and harassment and will take prompt and appropriate action to address any such behaviour. This commitment applies across all areas of our organisation, including our schools and teacher training centre.

2. Purpose

The purpose of this policy is to:

- Define what constitutes bullying and harassment in both work and learning environments
- Outline MMI's approach to preventing, addressing, and resolving such behaviour promptly and fairly
- Ensure that all individuals associated with MMI—including employees, trainees, trainers, volunteers, and contractors—understand their responsibilities and know how to report concerns safely and confidentially
- Promote a culture of respect, dignity, and inclusion across all areas of MMI's operations.



3. Scope

This policy applies to all individuals engaged in work, study, or training for or on behalf of MMI, including:

- Full-time and part-time employees
- Temporary staff and contractors
- Volunteers, directors, consultants, and trainers
- Teacher trainees and students enrolled in MMI programmes
- Any other individuals participating in MMI-organised activities or events

Please note that this policy does not form part of any employee's contract of employment and may be amended at any time to reflect best practices and legal requirements.

4. Regulatory Compliance and Protection

4.1 Students

This policy outlines our procedures regarding harassment and sexual misconduct, ensuring compliance with the Office for Students (OfS) Condition E6. It demonstrates the steps we are taking to protect students from behaviours that may amount to harassment and/or sexual misconduct, as well as the proactive measures we implement to reduce the likelihood of such behaviours occurring.

Students registered for the FdA in Montessori Pedagogy may also be referred to the University of East London for additional support or reporting options.

4.2 All Stakeholders

Reports of harassment or sexual misconduct can be submitted by:

- Staff members
- Trainees or volunteers
- Individuals who are neither staff nor students but have a connection to MMI activities



MMI ensures:

- Confidential reporting channels and protection against retaliation
- Fair and timely investigation of all reports
- Access to support services, including counseling and mediation
- Compliance with UK legislation, including the Equality Act 2010 and Protection from Harassment Act 1997
- Preventive measures, such as mandatory training and awareness programs for all stakeholders.

4.3 Disclosure and Reporting

Incidents of harassment, bullying, or sexual misconduct may be disclosed or reported to MMI.

A disclosure refers to sharing an experience confidentially for the purpose of receiving support. In most cases, the response to a disclosure will be limited to offering support, unless a safeguarding concern is identified.

A report refers to formally notifying MMI of an incident with the intention that action be taken in response to the allegation.

A disclosure may become a report if it is decided that formal action should be initiated.

MMI ensures that all disclosures and reports are handled sensitively, confidentially, and in accordance with organisational procedures and legal obligations.

Action: Where there is a belief that an individual or another person may be experiencing bullying, harassment, or sexual misconduct, prompt action is expected in accordance with MMI procedures.

Disclosure does not equal investigation: The Institute will not assume that a disclosure automatically means the individual wishes to initiate a formal disciplinary investigation. We will respect the wishes of the person making the disclosure wherever possible.

Anonymous reports: The Institute will not normally act in response to anonymous allegations; however, such reports will be considered on a case-by-case basis, particularly where there is a potential risk to others.



Multiple reporting channels: Reports can be submitted verbally or in writing to the Head of Department, a line manager, designated safeguarding lead, or through formal grievance procedures.

Confidentiality: All disclosures will be handled sensitively and confidentially, with information shared only on a “need-to-know” basis.

Support: Individuals making a disclosure will be offered appropriate support, regardless of whether they choose to pursue a formal investigation.

Third-party reports: Reports may also be submitted by individuals who are not staff or students but have a connection to MMI activities. These will be assessed for suitability and processed on a case-by-case basis.

Record Keeping: Information relating to a complaint, including details about an employee or a student, should be retained on the individual’s personnel or student file. This record may include the outcome of the process and any notes or documents compiled during the investigation, in accordance with data protection requirements.

Protection Against Retaliation: Any individual who submits a complaint, reports wrongdoing, or participates in good faith in an investigation must not be subjected to retaliation or victimisation. This protection applies to all stakeholders, including staff, students, trainees, volunteers, and external partners. MMI is committed to ensuring that all persons involved in these processes are treated fairly and without prejudice. Any act of retaliation will be regarded as a serious breach of policy and may result in disciplinary action.

4.3.1 Communication of Outcomes

Any outcomes resulting from a report of harassment, bullying, or sexual misconduct will be communicated in accordance with the relevant procedures:

- For students, outcomes will follow the process set out in the Student Conduct Policy and Disciplinary Procedures
- For all other stakeholders, outcomes will be communicated in line with the MMI Disciplinary Procedures.

4.4 Support

When an incident of harassment, bullying, or sexual misconduct is disclosed, or when a report of alleged misconduct is made, the matter will be handled with sensitivity and confidentiality. Individuals involved will be supported and informed of the options available under MMI procedures.



Reporting incidents of harassment, bullying, or sexual misconduct is encouraged. The decision to report or not report will be respected, and support will be offered to anyone who makes a disclosure.

4.4.1 Anti-Bullying and Harassment

- Anti-Bullying Alliance (ABA)
Website: <https://anti-bullyingalliance.org.uk>
Email: aba@ncb.org.uk
- BulliesOut
Website: <https://bulliesout.com>
Email: mentoronline@bulliesout.com
- HAB Antibullying & Mental Health
Website: <https://www.hab-antibullying.com>
Helpline: 07369 276817

4.4.2 Workplace Harassment Support

- Suzy Lamplugh Trust
Website: <https://www.suzylamplugh.org>
Helpline: 0808 802 0300
- Acas
Website: <https://www.acas.org.uk>
Helpline: 0300 123 1100

4.4.3 Sexual Misconduct

- Rape Crisis England & Wales
Website: <https://rapecrisis.org.uk>
Helpline: 0808 802 9999
- The Survivors Trust
Website: <https://thesurvivortrust.org>
Helpline: 0808 801 0818

4.4.4 National Support Services

- National Bullying Helpline
Website: <https://www.nationalbullyinghelpline.co.uk>
Helpline: 0300 323 0169
- Victim Support
Website: <https://www.victimsupport.org.uk>
Helpline: 0808 168 9111



- Samaritans
Website: <https://www.samaritans.org>
Helpline: 116 123

4.4.5 Employee Assistance Programme (EAP)

In cases of harassment, bullying, or sexual misconduct, MMI staff have access to the Employee Assistance Programme (EAP). The EAP provides confidential support services, including a helpline, digital wellbeing resources, and additional tools designed to promote mental health and resilience.

5. Roles and Responsibilities

Each member of the organisation has a role to play in helping achieve an inclusive and supportive environment, and in promoting good relations between all.

Every member of staff has a personal responsibility to ensure their own conduct does not cause offence to others and to raise any issues of harassment or bullying in a timely manner, so that investigations can be carried out at the earliest opportunity.

Line managers are responsible for ensuring that harassment, discrimination and bullying are not permitted within their sphere of management, and that any incidents are dealt with firmly and fairly. Complaints should be taken seriously, and investigations carried out in line with MMI's Grievance Procedure.

6. Definitions

6.1 Harassment vs Bullying

While harassment and bullying are both unacceptable behaviours, they differ in their nature and legal implications:

6.2 Harassment

Definition: Unwanted behaviour related to a protected characteristic under the Equality Act 2010, such as age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

Legal Status: Harassment is unlawful and specifically linked to discrimination law.



Examples:

- Offensive comments about someone's race or religion
- Unwanted sexual advances
- Creating a hostile environment based on gender or disability

6.3 Bullying

Definition: Repeated, unreasonable, or inappropriate behaviour that targets an individual or group, creating a risk to health, safety, or wellbeing. Bullying does not need to relate to a protected characteristic.

Legal Status: Bullying is not defined in law in the same way as harassment, but employers have a duty of care to prevent it.

Examples:

- Persistent criticism or undermining someone's work
- Excluding someone from meetings or social activities
- Spreading rumours or intimidating behaviour

6.4 Key Difference

Harassment is linked to discrimination law and protected characteristics.

Bullying is about repeated harmful behaviour, regardless of whether it relates to a protected characteristic.

6.5 Protected Characteristics

- **Age** – including remarks or jokes about life stages (e.g., menopause) or menstruation
- **Disability** – including conditions such as dyslexia
- **Gender Reassignment** – including individuals who identify as transgender
- **Religion or Belief** – covering all faiths and philosophical beliefs
- **Sex** – referring to biological sex
- **Sexual Orientation** – including all orientations
- **Race** – encompassing ethnicity, nationality, and cultural background, not limited to skin colour



- **Nationality** – Refers to the legal relationship between an individual and a state, often signified by citizenship. It indicates the country to which a person belongs under law and can determine rights such as residence, voting, and protection by that state
- **Ethnic or National Origins** – Refers to a person's historical, cultural, or ancestral background. This includes shared traditions, language, and heritage linked to a particular ethnic group or nation, regardless of current nationality or citizenship.

7. Harassment

7.1 Duty of Care

MMI recognises that harassment in any context—whether involving staff, students, trainees, volunteers, or external partners—is a serious matter. It can harm wellbeing, damage relationships, and undermine the integrity of our learning and working environment. We are committed to creating a culture where harassment is completely unacceptable and will not be tolerated under any circumstances.

As an organisation, MMI has a legal and ethical duty of care to protect all stakeholders from harassment and discrimination by taking all reasonable steps to prevent such conduct. In line with UK legislation, we must ensure that we:

- Do not unfairly discriminate in any aspect of our operations
- Take steps to prevent discrimination and harassment.
- Do all that we reasonably can to protect individuals from discrimination or harassment by others.
- Safeguard the wellbeing of everyone engaged in MMI activities.

Failure to comply with these obligations can cause harm and distress and may result in complaints, legal claims, or regulatory action. MMI can be held responsible for the actions of its representatives under the principle of vicarious liability. Individuals who engage in harassment or discrimination are also personally accountable and may face legal consequences.



7.2 Responsibility for Enforcement

Managers, supervisors, and those in positions of responsibility play a critical role in upholding this policy. They are expected to reinforce standards within their teams or groups, monitor behaviour, and address concerns promptly and effectively. All stakeholders share responsibility for maintaining a respectful environment and reporting any concerns.

7.3 Cyber Harassment

Cyber harassment occurs when digital platforms or technologies are used to intimidate, threaten, or harass an individual. This behaviour can take many forms, including but not limited to:

- Sending offensive or inappropriate messages via email, text, or messaging apps (e.g., WhatsApp)
- Publishing harmful or defamatory content on blogs or websites
- Sharing or posting abusive videos online
- Posting derogatory comments or materials on social networking sites.

7.3.1 Impact on the Organisation

Cyber harassment can have serious consequences for MMI and its stakeholders, including:

- Creating a hostile or toxic environment that undermines wellbeing, satisfaction, and performance
- Damaging organisational reputation and trust
- Increasing the risk of legal claims, such as constructive dismissal, discrimination, harassment, or victimisation
- Hindering recruitment efforts and making it difficult to attract and retain staff and volunteers in the future.

7.4 Sexual Harassment

Sexual harassment and misconduct refer to any unwanted conduct of a sexual nature. This behaviour is unacceptable in all contexts and will not be tolerated within MMI activities. Examples include, but are not limited to:

- Sexual harassment (verbal, non-verbal, or physical)
- Unwanted physical sexual advances



- Intimidation or coercion, including offering resources, benefits, or opportunities in exchange for sexual favours
- Sharing or distributing explicit personal material without consent
- Sexual assault
- Rape.

7.4.1 Key Principles

- Sexual harassment is defined as behaviour of a sexual nature that is uninvited and unwelcome, regardless of intent
- A single incident or repeated behaviour can constitute harassment

- Harassment does not need to occur face-to-face; it can take other forms, including online communication, images, written materials, or text messages
- These examples are illustrative, not exhaustive.

7.4.2 Applicability

This policy applies to all stakeholders engaged in MMI activities, including staff, students, trainees, volunteers, and external partners. Allegations of sexual misconduct are treated with the utmost seriousness and may constitute criminal offences.

7.4.3 Investigation and Response

For students, allegations will be investigated under the Student Conduct Policy at Level 2 or Level 3, led by the Head of Training in consultation with the Executive Director.

For all other stakeholders, investigations will follow MMI's internal disciplinary and safeguarding procedures, ensuring fairness, confidentiality, and compliance with legal obligations.

8. Key Personnel Contact Details

- The Chair of the Trustees/Board of Directors is Sara Giwa-McNeil

Contact details: email: chair@mariamontessori.org Tel: 020 7435 3646

- The Head of School is Michel Capobianco

Contact details: email: michel.capobianco@mariamontessori.org Tel: 020 7435 3646



- The Head of Training is Louise Livingston

Contact details: email: louise.livingston@mariamontessori.org Tel: 020 3870 1980

- The Head of Finance and Administration/Bursar is Monika Pempyte

Contact details: email: monika.pempyte@mariamontessori.org Tel: 020 7435 3646

- The Designated Safeguarding Lead (DSL) is Karen Gelson

Contact details: email: karen.gelson@mariamontessori.org Tel: 020 7435 3646

(Out of school hours telephone contact is 07830391472)

- The Deputy Designated Lead (DDSL) is Michel Capobianco

Contact details: email: michel.capobianco@mariamontessori.org Tel: 020 7435 3646

- The Board Member with responsibility for safeguarding is Catherine Middlemas

Contact details: email: Catherine.middlemas@mariamontessori.org

- The Executive Director is Lynne Lawrence

Contact details: email: lynne.lawrence@mariamontessori.org Tel: 020 7435 3646

9. Related Policies

9.1 Internal Policies

- Behaviour Policy
- Disciplinary Procedure
- Safeguarding Policy
- Whistleblowing Policy
- Student Conduct Policy
- Personal Relationship Policy

9.2 External policies

- Condition E6: Harassment and sexual misconduct - Office for Students
- Statement of Expectations relating to Sexual Misconduct



10 Review and Updates

This policy will be reviewed annually and updated as necessary to ensure it remains effective and compliant with current laws and best practices.