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English Path Global Anti-Harassment, Anti Bullying & Abuse Prevention Policy

Version History

Version	Author	Reviewed by	Pages	Approved by	Date published
2	Dorian Grey	-	14	Sian Matos (Regional Manager)	16.06.2025
1	Dorian Grey	Juliette Synnott	5	Mike Summerfield (Managing Director)	05.09.2023

Introduction

This policy outlines English Path’s commitment to preventing and addressing harassment, bullying, and abuse across all centres. It establishes clear procedures for reporting, investigation, and support, ensuring compliance with safeguarding duties including the Prevent duty. The policy applies to all students, staff, and stakeholders in all modes and settings of provision.

Translations available. Please ask Student Services.

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1. Purpose

The purpose of this policy is to affirm English Path's commitment to providing a safe, inclusive, and respectful environment in which all members of the community (including students, staff, and stakeholders) are protected from all forms of harassment, abuse, and bullying, whether physical, emotional, sexual, or psychological. This policy provides a clear framework for prevention, reporting, and response procedures and outlines the responsibilities of all involved parties across English Path campuses worldwide.

2. Scope

This policy applies to all English Path educational centres operating in the UK, Ireland, Malta, France, Germany, Spain, UAE, Saudi Arabia, Canada, Australia and EP Online. It covers:

All staff, students, volunteers, contractors, visitors, and stakeholders

All activities, including in-person, online, on-campus, off-campus, and affiliated learning environments

Both informal and formal contexts, including digital communication channels

3. Definitions

Abuse: Any act or failure to act that causes harm or potential harm to another person. This includes physical abuse, emotional or psychological abuse, sexual abuse, neglect, and exploitation. Abuse can occur between peers or be perpetrated by staff or external individuals in positions of trust.

Bullying: Repeated, intentional behaviour intended to intimidate, harm, or humiliate another individual, whether physically, verbally, socially, or digitally.

Discrimination: Unjust or prejudicial treatment based on protected characteristics such as race, gender, age, religion, sexual orientation, or disability.

Harassment: Unwanted conduct affecting the dignity of any individual, including sexual harassment, offensive language or behaviour, intimidation, or any form of degrading treatment.

Safeguarding: Protecting the health, well-being, and rights of vulnerable individuals, especially young learners or at-risk adults.

Young Learners: Students under the age of 18 enrolled in any English Path programme.



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4. Responsibility

Senior Leadership Team (SLT): Ensure policy implementation, monitoring, and institutional compliance.

Academic and Centre Managers: Apply this policy within their locations and act as primary escalation contacts.

Safeguarding Leads: Respond to reports involving young learners and vulnerable individuals.

All Staff and Students: Uphold a respectful culture and report concerns promptly.

5. Policy and Procedure

5.1 Overview

English Path is committed to providing a safe, inclusive, and respectful environment for all students, staff, and stakeholders across all campuses. This policy applies to all forms of harassment and bullying, including physical, verbal, psychological, sexual, discriminatory, or digital in nature, whether occurring in person, online, on campus, or in any school-affiliated context.

Harassment and bullying are unacceptable and will not be tolerated. Allegations will be addressed sensitively, promptly, and in line with English Path's safeguarding obligations, complaints procedures, and the relevant legal and accreditation frameworks of each jurisdiction.

All safeguarding leads and relevant staff receive training on statutory safeguarding responsibilities, including the Prevent duty, to ensure the early identification and appropriate escalation of concerns related to harassment, abuse, bullying, or potential radicalisation.

5.1a Note on Young Learners

English Path recognises the particular vulnerability of students under the age of 18. All references in this policy to "students" include young learners unless explicitly stated otherwise. The rights, reporting routes, protections, and procedures described herein are applicable to young learners, and will be adapted where necessary to ensure accessibility and age-appropriate handling. In cases involving minors, English Path's Safeguarding Policy and the relevant national child protection laws take precedence and will guide all actions.

5.2 Informal Resolution

Where appropriate, individuals are encouraged to resolve issues informally before initiating a formal process. For example:

- A student may ask a peer to stop unwanted behaviour directly.
- A staff member may raise concerns with a line manager or HR.



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- Young learners may seek assistance from a teacher, group leader, or safeguarding staff member if unsure how to raise a concern.

Support may be provided by Student Services, Academic Management, or designated safeguarding personnel to facilitate informal resolution. If the issue persists, is serious, or informal resolution is not appropriate, the formal procedure should be followed.

5.3.1 Formal Reporting Process

Reports may be submitted:

- Verbally or in writing to any staff member
- Directly via the Global Complaints Policy channels (see [Complaints Policy](#))
- With the assistance of Student Services, safeguarding staff, or a designated colleague

Anyone reporting harassment, bullying, or abuse will be treated with dignity, and the matter will be kept confidential except as necessary to protect individuals or meet legal obligations.

Young learners may also ask a parent or trusted adult to report on their behalf.

5.3.2 Receipt and Initial Review

Once a report is received, it will be:

Logged and acknowledged within 24 hours

Reviewed by the designated local lead (e.g., HR, Academic Manager, or Designated Safeguarding Lead)

Triaged for severity, credibility, and immediate risk

Urgent concerns involving safety or safeguarding will be escalated immediately and referred in line with English Path's safeguarding policy and local laws.

5.4 Investigation Process

If formal investigation is warranted:

- The Centre Manager working with the HR will appoint an appropriate senior member of staff, not immediately involved in the case, to investigate the complaint.
- Both complainant and respondent will be interviewed separately
- Relevant evidence (e.g., messages, emails, CCTV) will be collected
- The investigation will aim to be concluded within 10 working days
- All parties will be informed of the timeline, their rights, and the outcome, in writing.



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5.5 Outcomes and Disciplinary Action

Depending on findings, outcomes may include:

- No further action (if not substantiated)
- Mediation or behavioural agreements
- Written warnings
- Suspension or dismissal (staff)
- Temporary or permanent exclusion (students)
- Referral to external authorities (in cases of criminal conduct)

All disciplinary decisions involving students or staff will follow English Path's internal disciplinary frameworks and relevant accreditation or regulatory obligations. Please see the English Path [Disciplinary Policy](#).

5.6 Abuse, Harassment and Bullying in External Settings

Abuse, harassment, or bullying may occur in environments beyond the school's immediate control, such as placements, excursions, or accommodation settings. The school maintains a duty of care to support students in these contexts and will liaise with third parties and authorities to ensure protection and redress, in accordance with legal and regulatory obligations (e.g., British Council CRG M24; QQI ELE Code 4.3).

5.7 Abuse as a Legal Offence

Certain forms of abuse—particularly sexual abuse, physical violence, and neglect of minors—are criminal offences. For adult complainants, the decision to involve police remains with the complainant unless the law requires reporting. English Path will provide full support regardless of their choice. **For incidents involving minors, English Path must report to law enforcement or child protection services as required by law.**

5.7.1 Immediate Reporting Requirements

All English Path staff must immediately report the following situations to English Path's Designated Safeguarding Lead and/or local Centre Manager.

Always Report Immediately:

- Any suspected harm to persons under 18 (physical, sexual, emotional abuse, neglect, or exposure to violence)
- Imminent physical or medical danger to any person
- Sexual assault or serious physical assault (any age)
- Credible threats of violence

No exceptions: Staff must report regardless of complainant preferences, family objections, or confidentiality requests.



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The incident should be documented within 24 hours using Incident Report Form and the designated Safeguarding Lead and/or Centre Manager should report to local authorities as required.

5.8 Interim Protective Measures

To ensure safety during investigations, English Path may implement:

- Temporary timetable changes
- Class or accommodation reassignment
- Access restrictions
- Supervision adjustments

For young learners, additional safeguarding measures—such as supervised transitions or staff escorts—may be implemented to ensure safety.

These are protective, not punitive, and will be reviewed regularly.

5.9 Protection from Retaliation

Retaliation against individuals who report harassment or participate in investigations is strictly prohibited. Any form of reprisal may result in disciplinary action.

5.10 Confidentiality and Data Handling

All complaints and investigations are handled with strict confidentiality. Data will be stored securely and only accessible to authorized personnel. Records are retained in accordance with the English Path [Privacy Policy](#).

5.11 Support and Referral

Where a formal investigation or disciplinary hearing is involved, students may request to be accompanied by a support person (e.g., peer or staff member) as outlined in the [Disciplinary Policy](#).

While English Path does not currently provide in-house psychological services, students and staff will be signposted to qualified external wellbeing professionals or helplines upon request. Local referral lists are maintained by Student Services and safeguarding leads.

5.12 Safeguarding and Escalation

Cases involving children or vulnerable adults will be managed in accordance with the relevant English Path Safeguarding Policy and country-specific legal requirements. Safeguarding Leads are listed on local school noticeboards and on the [English Path policy webpage](#)



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5.13 Appeals

If a harassment investigation results in formal disciplinary action, the respondent may appeal through the process outlined in the English Path [Disciplinary Policy](#). Complainants dissatisfied with investigation handling or outcomes may appeal via the [Global Complaints Policy](#).

5.14 Monitoring and Review

To ensure the effectiveness of this policy and the well-being of all community members:

- Records of reported incidents, outcomes, and trends will be reviewed and patterns of behaviour, repeat concerns, or systemic risks may trigger additional preventive measures or policy amendments.
- Feedback from complainants and respondents will be anonymized and reviewed to inform continuous improvement.

6. Review Cycle

This policy will be reviewed annually to ensure continued alignment with applicable accreditation standards, current legislation, evolving best practices, and the strategic and operational needs of the school.

7. References and Related Policies

- English Path Complaints Policy
- English Path Safeguarding Policy
- English Path Disciplinary Policy

The above policies are available on our [policies webpage](#).

- British Council Accreditation Criteria (2024)
- QQI Code of Practice and QA Guidelines (Ireland)
- Equals Quality Standards v7.3 (2025)
- ELICOS Standards and ESOS Act (Australia)
- Languages Canada QA Scheme (2024)
- ELT Council Policy Manual and Safeguarding Standards (Malta)

8. Forms

- Incident Reporting [Form](#).



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9. Appendices

- Appendix A: Country-Specific Legal and Accreditation Frameworks
- Appendix B: Reporting Flowcharts for Staff and Students
- Appendix C: Examples of harassment, bullying and abuse

This policy document was developed with the assistance of AI technology to support clarity, compliance and alignment with international accreditation standards.



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Appendix A: Country-Specific Legal and Accreditation Frameworks

This appendix outlines key legal frameworks related to harassment, bullying, and safeguarding in each country where English Path operates. Local procedures should be read in conjunction with this policy.

United Kingdom

- Equality Act 2010 (prohibits harassment and discrimination)
- Children Act 1989 and Working Together to Safeguard Children
- Human Rights Act 1998
- Protection from Harassment Act 1997
- Employment equality regulations 2003
- British Council Accreditation guidelines

Ireland

- Employment Equality Acts 1998–2015
- QQI Code of Practice for ELE and Statutory QA Guidelines
- Children First Act 2015 (mandatory reporting)

Malta

- ELT Council Policy Manual and Safeguarding Minors Policy
- Education Act (CAP. 327)
- Child Protection (Alternative Care) Act 2019

France, Germany, Spain

- Compliance with EU Charter of Fundamental Rights
- National labour codes and education laws
- EU Equal Treatment and Anti-Harassment Directives

United Arab Emirates (UAE)

- UAE Federal Labour Law (provisions on workplace harassment)
- UAE Child Protection Law (Wadeema's Law)
- Ministry of Education safeguarding guidelines

Saudi Arabia

- Anti-Harassment Law (Royal Decree No. M/96)
- Labour Law provisions on employee protection
- Cultural sensitivity in enforcement and reporting



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Canada

- Canadian Human Rights Act
- Provincial laws (e.g., Ontario Occupational Health and Safety Act)
- Languages Canada QA Standard requirements

Australia

- Fair Work Act 2009
- Sex Discrimination Act 1984
- ESOS Act and ELICOS Standards
- Child Protection legislation by state (e.g., NSW Children and Young Persons Act)



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Appendix B: Incident Reporting Flowcharts – Students and Staff





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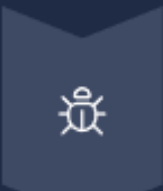
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Staff Incident Reporting Flowchart



Experience or Receive Report

Identify incident requiring action.



Report Through Appropriate Channel

Line Manager, Centre Manager, HR or Safeguarding Lead.



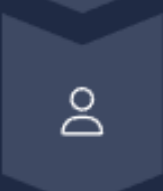
Designated Reviewer Assigned

HR, Manager, or Safeguarding Lead triages case.



Investigation Initiated

Senior neutral staff reviews witnesses and evidence.



Outcome Issued

Disciplinary action or referral to authorities if needed.



Appeal Process

Via internal appeal or Global Complaints Policy.

Staff and students should refer to English Path's regional safeguarding policies for detailed implementation procedures specific to each location.



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Appendix C. Examples of Harassment, Bullying and Abuse

(i) Harassment

Harassment refers to unwanted behaviour related to a personal characteristic that violates a person's dignity or creates an intimidating, hostile, degrading or offensive environment. This may include:

- **Sexual harassment:** Unwelcome sexual advances, sexually suggestive remarks or jokes, inappropriate touching, comments on appearance, sharing offensive images, or inappropriate digital communication.
- **Racial harassment:** Insults, racist jokes, derogatory name-calling, ridicule of cultural practices, or verbal abuse related to ethnic background.
- **Disability harassment:** Mocking or ignoring someone due to disability, unwelcome attention to a person's appearance, or assumptions about competence.
- **Age-related harassment:** Patronising or excluding individuals based on age, or undermining their contributions.
- **Sexual orientation harassment:** Homophobic remarks or jokes, ridicule, threats to disclose sexual orientation, or abuse related to HIV status.
- **Religion or belief harassment:** Offensive comments, exclusion from prayer or observance, or ridicule of religious dress or dietary requirements.
- **Gender reassignment harassment:** Inappropriate questions or jokes about gender identity, or comments about dress or appearance.
- **Status harassment:** Patronising or marginalising others due to job role or background, including displays of favouritism.

This list is not exhaustive. Harassment can occur based on any characteristic that differentiates an individual from others.

(ii) Bullying

Bullying involves repeated or severe negative behaviours intended to undermine, intimidate or distress another person personally, academically, or professionally. This may include:

- Verbal aggression, such as shouting, sarcasm or derogatory remarks.
- Persistent criticism or undermining of performance or character.
- Deliberate exclusion or social isolation.
- Abuse of authority or coercion, especially where there is an imbalance of power.
- Intimidation through threats or controlling behaviour.

Reasonable academic demands or performance management are not bullying. Bullying may be perpetrated by peers, subordinates or those in senior roles.

(iii) Abuse

Abuse is any action that intentionally harms or threatens to harm another's physical or emotional wellbeing. It can be perpetrated in person or online, and may involve:

- **Physical abuse:** Deliberate physical harm such as hitting, pushing or misuse of medication.
- **Emotional abuse:** Threats, humiliation, isolation, manipulation or persistent verbal abuse.



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- **Sexual abuse:** Non-consensual sexual contact or conduct, including inappropriate touching, grooming, or exposure to sexual content.
- **Neglect:** Failing to provide appropriate care or supervision, especially where there is a duty of care.
- **Financial abuse:** Misuse or exploitation of another's finances or possessions.
- **Digital abuse:** Online harassment, coercion, or distribution of harmful content.

Any form of abuse must be reported and will be treated seriously in accordance with safeguarding procedures and legal requirements.