PREVENTION OF SEXUAL HARASSMENT IN THE WORKPLACE POLICY

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RATIONALE

The Trust is committed to protecting all our staff, to creating a workplace that is safe and supported to achieve the high standards we aspire so our children achieve and thrive.

The Trust is committed to ensuring that all reasonable steps are taking to prevent sexual harassment of our staff. This policy has been updated to reflect the new duty introduced by The Employment Rights Act 2025, to come into force in October 2026, which requires organisations to take "all reasonable steps" to prevent third party harassment of staff. This will include harassment from colleagues and staff, pupils, parents/carers, suppliers, contractors and other visitors, whether in person or virtually.

Whilst adopting and implementing a Prevention of Sexual Harassment in the Workplace Policy is critical, this is about our culture as an organisation and the behaviours will seek to see. There are a number of actions that the Trust will put in place to support our shared goal: these include training and professional development for all staff and for leaders, monitoring and review by Trustees and Governors and regular staff voice reviews including annual staff wellbeing survey and exit interviews. This list is not exhaustive but illustrative of our shared commitment to making our schools a safe place to work and addressing incidents in a robust way.

DEFINITIONS

In this Prevention of Sexual Harassment in the Workplace Policy, unless the context otherwise requires, the following expressions shall have the following meanings:

(i) 'Academy' means any school operated by Veritas Multi Academy Trust and includes all sites upon which the Academy undertaking is, from time to time, being carried out.

(ii) 'Board' means the board of Directors of the Trust.

(iii) 'Headteacher' means the most senior teacher in the Academy who is responsible for its management and administration.

(iv) Local Academy Committee means, the governors appointed to carry out specified functions in relation to the Academy as delegated by the Scheme of Delegation

(v) 'Trust' means Veritas Multi Academy Trust which is the company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Academy.

(vi) Words in the singular include the plural and words in the plural include the singular.

1. About this Policy

1.1 We are committed to providing a working environment free from sexual harassment and victimisation and ensuring that all staff are treated, and treat others, with dignity and respect. We have a zero-tolerance approach to any form of sexual harassment in the workplace.

1.2 We have a duty of care to all staff, pupils and visitors coming onto our site to ensure their health and safety, and that we are providing a safe place to work and learn. Individual staff members have their own obligations to ensure that they are not creating an unsafe environment for their colleagues or those with whom they may come into contact at work.

1.3 Sexual harassment of any member of staff by a colleague or any third party who they come into contact with during the proper course of their work, is unlawful under the Equality Act 2010 and will not be tolerated under any circumstances. This includes sexual harassment which occurs:

a. in the workplace, including all Trust/Academy sites;

b. during work-related travel or trips;

c. during remote and hybrid working;

d. through telephone calls, emails, messaging applications, social media and other electronic communications;

e. at training events and conferences;

f. at open days/evenings, parent consultations and other Trust/Academy-related events;

g. pupil-centred off-site Trust/Academy-related events, such as extra-curricular activities and sports fixtures; and

h. at work-related social events and other social events sufficiently connected to work to impact, or potentially impact, workplace relationships.

1.4 This policy applies to interactions with suppliers, contractors and other third parties and covers sexual harassment and victimisation by staff (which may include consultants and agency workers) and also by third parties such as suppliers, contractors or visitors to our premises.

1.5 In cases where allegations relate to sexual harassment or victimisation of a member of staff by a pupil, they may also be handled under other policies, including Behaviour Policy and or Safeguarding and Child Protection Policy

1.6 We will take active steps to help prevent the sexual harassment and victimisation of all staff.

Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support. Sexual harassment can adversely impact the Trust and Academy, the complainant and the perpetrator, irrespective of whether they work for us, or are a third-party outside of our control. Engaging in sexual harassment or victimisation of any person may result in disciplinary action against those employed by the Trust, up to and including dismissal. Where the person engaging in such conduct is not subject to our disciplinary procedures, for example because they are a contractor or self-employed consultant, sexual harassment or victimisation may result in the immediate termination of their engagement or assignment with us.

1.7 This policy covers all employees, officers, consultants, contractors, volunteers, casual workers, agency workers, apprentices, volunteers and interns.

1.8 This policy does not form part of any contract of employment and we may amend it at any time.

2. Personnel responsible for this policy

2.1 The Board has overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for overseeing its implementation to Headteachers and the CEO.

2.2 All line managers have a specific responsibility to operate within the boundaries of this policy, attend and apply the principles of any mandatory or voluntary training, ensure that all staff understand the standards of behaviour expected of them and to take action when behaviour falls below those standards.

2.3 Staff should promptly disclose any instances of sexual harassment or victimisation of which they become aware in line with this policy.

2.4 This policy is reviewed bi-annually by the Board

2.5 Questions about this policy and requests for training or information on dealing with sexual harassment or victimisation should be directed to the Trust HR team.

3. What is sexual harassment?

3.1 Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature 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 sexual harassment. Sexual harassment can occur even where someone is not the intended target of the sexual harassment or victimisation. Witnessing the sexual harassment of another person can constitute sexual harassment just as if the behaviour had been directed at you.

3.2 It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex.

3.3 Sexual harassment may include, for example:

(a) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;

(b) continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome (including by silence/non-reciprocation);

(c) workplace “banter” such as jokes of a sexual nature and innuendo;

(d) sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent, or shown, by mobile phone or posted on the internet);

(e) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); or

(f) offensive emails, text messages or social media content.

These are examples only and not an exhaustive list.

3.4 A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

3.5 The intention of the perpetrator is irrelevant to the question of whether someone has been sexually harassed. It is possible for conduct to amount to sexual harassment of another person even where this was not the intention.

3.6 Third-party harassment occurs where a person is harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. This would include, for example, sexual harassment of our staff by a parent, supplier, visitor or other third party, committed on Trust premises, or otherwise where committed during the course of the individual’s employment or sufficiently connected to their employment.

3.7 All staff are encouraged to report any sexual harassment, including third-party sexual harassment, they are a victim of, or witness to, promptly and in accordance with this policy.

3.8 Any sexual harassment by a member of staff against a third-party may lead to disciplinary action up to and including dismissal.

3.9 We will take active steps to try to prevent third-party sexual harassment of staff. Action may include, but is not limited to: warning notices to third parties; recorded messages at the beginning of telephone calls; implementing clear behaviour expectations, which are enforced, for pupils; publishing an expectations statement for parents and visitors; including behavioural expectations in parent communications; signage at receptions and school events; escalation processes for abusive parents/carers; warnings and restrictions on access where necessary and appropriate; procedures for reporting parent, visitor or contractor

misconduct.

3.10 If any third-party sexual harassment of our staff occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include: warning the harasser about their behaviour; reminding third-parties of our expectations relating to standards of behaviour towards our staff; bringing the working arrangement to an immediate end; banning them from Trust/Academy premises and/or events, where possible; reporting any criminal acts to the police; and sharing information with other schools and academies in our Trust and locally.

3.11 Engaging in sexual harassment may constitute other types of unlawful or discriminatory treatment including but not limited discrimination because of sex or gender reassignment, religion or belief discrimination, breach of contract including the implied duty of mutual trust and confidence, and breach of health and safety obligations.

3.12 Allegations of sexual harassment may also render someone unsuitable to work with children or vulnerable groups and trigger our obligations under the Trust's Safeguarding and Child Protections Policy including with regard to making the necessary referrals to the statutory agencies such as the Local Authority Designated Officer (LADO), the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA).

4. What is Victimisation?

4.1 Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

(a) Bringing proceedings under the Equality Act 2010;

(b) Giving evidence or information in connection with proceedings under the Equality Act 2010;

(c) Doing any other thing for the purposes of or in connection with the Equality Act 2010; or

(d) Alleging that a person has contravened the Equality Act 2010.

4.2 Victimisation may include, for example:

(a) Denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment (or any other complaint under the Equality Act 2010);

(b) Excluding someone because they have raised a grievance about sexual harassment (or any other complaint under the Equality Act 2010);

(c) Failing to promote someone because they accompanied another staff member to a grievance meeting; or

(d) Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.

These are examples only and not an exhaustive list.

4.3 Sexual harassment and victimisation are unlawful and will not be tolerated. They may lead to

disciplinary action up to and including dismissal if they are committed:

(a) in any of the circumstances set out in *Section1.3* of this policy;

(b) against a colleague or other person connected to us outside of a work situation, including on social media.

(c) against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role and/or to work with children or vulnerable groups.

4.4 We will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

5. Preventative Measures

5.1 To meet its commitment to preventing sexual harassment in the workplace, the Trust will:

(a) Ensure that anyone coming onto our site or into contact with our staff is clear on the standards of behaviour that is expected of them, and our zero-tolerance approach to sexual harassment in the workplace;

(b) Conduct regular sexual harassment and victimisation risk assessments;

(c) Review workplace and cultural risks annually

(d) Provide mandatory induction and refresher training to all staff, trustees and governors;

(e) Provide enhanced training for senior leaders, managers, trustees, governors and investigators;

(f) Evaluate training and update as needed to manage particular risks identified;

(g) Monitor reporting trends and complaints;

(h) Review categories of risk in respect of the perpetration of sexual harassment and victimisation e.g. from or by staff or other individuals engaged by the Trust; from pupils; from parents/carers; from suppliers and/or contractors; from other third parties;

(i) Implement and review measures to prevent third-party sexual harassment;

(j) Maintain clear reporting channels; and

(k) Periodically review this Policy and related procedures.

5.2 These non-exhaustive measures are intended to support compliance with the requirement to take all reasonable steps to prevent sexual harassment in the workplace.

6. If you witness sexual harassment or victimisation in the workplace

6.1 Staff who witness workplace sexual harassment are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:

(a) Intervening where you feel able, and it is safe, to do so;

(b) Supporting the person subjected to the harassment to report it or reporting it on their behalf;

(c) Reporting the incident where you feel there may be a continuing risk if you do not report it; and

(d) Cooperating in any investigation into the incident.

6.2 All witnesses will be provided with appropriate support and will be protected from victimisation.

7. If you are being sexually harassed

Informal steps

7.1 If any workplace sexual harassment or victimisation of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include updating relevant policies, providing further staff training, taking disciplinary action against the perpetrator and taking any other steps included in this policy, or otherwise as appropriate to the circumstances.

7.2 If you are being subjected to workplace sexual harassment, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome and/or makes you uncomfortable, and ask them to stop. If this is too difficult or embarrassing, you should speak to your line manager, who can provide confidential advice and assistance in resolving the issue formally or informally. In the event that your concerns relate to the behaviour of your line manager, you should contact the Trust's HR team

7.3 If you are not certain whether an incident or series of incidents amounts to workplace sexual harassment, you should initially contact your line manager or HR informally for confidential advice.

Formal steps

7.4 If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out in our Staff Grievance and Resolution Policy and Procedure.

7.5 Where you raise a grievance under our Staff Grievance and Resolution Policy and Procedure. we will consider any request that you make for changes to your working arrangements during the investigation. For example, you may ask for changes to your duties or working hours so as to avoid or minimise contact with the alleged harasser. However, the Trust reserves the right to refuse such changes where it would have an unreasonable and/or disproportionately adverse impact on colleagues and/or the efficient delivery of education and, instead, may engage with you to suggest alternative measures to seek to alleviate your concerns during the investigation, although there is no requirement for it to do so.

7.6 As a general principle, the decision whether to progress a complaint (whether formal or informal) is up to you. However, we have a duty to protect all staff (and pupils) and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so and in particular where the matter is relevant to our ability to comply with our safeguarding obligations. Advice may be sought from LADO at any stage of the process, whether the matter has been raised formally or informally, or even withdrawn by the

complainant.

8. Action during and/or following Investigation

8.1 As part of the investigation of any grievance about workplace sexual harassment or victimisation, whether or not your grievance is upheld, we will consider how best to manage the ongoing working relationship between you and the alleged harasser. It may be appropriate to arrange mediation and/or counselling, or to consider changing the duties, hours, working location or reporting lines of one or both parties, either temporarily or permanently, subject always to the needs of the Trust and the efficient delivery of education.

8.2 Where your complaint is about a staff member, we may deal with the matter as a case of possible misconduct or gross misconduct and, where appropriate, may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. This will be a matter for the Trust. We will also consider what additional action may be appropriate as a precautionary measure to safeguard staff and pupils pending the outcome of the investigation. We owe a duty of confidentiality to all staff and so, even if you are the complainant, we may not be able to disclose to you any specific action or precautionary measures taken in respect of the alleged harasser, including any suspension, modified duties during and/or disciplinary action.

8.3 The investigator will usually meet with the alleged harasser to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

8.4 Where your complaint is about someone other than a staff member employed by us, such as for example a supplier, contractor, agency worker or visitor, we will consider the most appropriate course of action including whether it is appropriate to end their engagement/assignment immediately without further investigation. In circumstances where the alleged harasser is not a member of staff the extent of the investigation will be determined having regard to the circumstances of the case and we are not required to follow a comprehensive process that we would otherwise be required to follow in respect of allegations against those who are employed by us. Where appropriate, we will attempt to discuss the matter with the third party before reaching a decision about their ongoing engagement/assignment.

9. Protection and support for those involved

9.1 Any staff member who deliberately provides false information or otherwise acts in bad faith in respect of an allegation of workplace sexual harassment, or as part of an investigation may be subject to disciplinary action under our Staff Disciplinary Policy and Procedure. However, you will not be disciplined or treated detrimentally because your complaint has not been upheld.

9.2 Staff who make complaints/grievances, report that they have witnessed wrongdoing or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way may be subject to disciplinary action under our Staff Disciplinary Policy and Procedure.

9.3 If you believe you have suffered any such treatment you should inform your line manager or HR. If the matter is not remedied, you should raise it formally using our Grievance Resolution Policy and Procedure. The Trust offers access to confidential counselling. This will be accessed by the HR Team.

10. Confidentiality and record-keeping

10.1 Confidentiality is an important part of the procedures referred to in this policy. Details of the investigation and the names of the person making the complaint and the person accused must usually only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Staff Disciplinary Policy and Procedure.

10.2 It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.

10.3 Information about a complaint by, or about, an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

10.4 The Trust and Academy may keep records of evidence of: complaints, investigations, outcomes, training completion records, risk assessments, attendance logs, survey results, Board reports, minutes of governor/trustee discussions, relevant communications with staff, pupils and third parties; policy review logs, records of interventions relating to abusive pupils, parents/carers, visitors and other third parties, and action plans and preventative actions taken. Data will be monitored to identify patterns, risks and opportunities for improvement.

10.5 We hope that staff will feel able to raise concerns openly under this policy. We do not encourage staff to make disclosures confidentially or anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Where you are concerned about possible reprisals if your identity is disclosed you should speak to your line manager or HR so that any confidentiality concerns can be discussed and appropriate measures taken to preserve confidentiality, if required.

10.6 Staff are reminded that all data, which is given the widest possible interpretation, created and/or used in respect of any concern or complaint raised, whether reported pursuant to this policy or otherwise, is confidential and may contain third party personal data, including special category data. Save as permitted by law or this policy, neither the Trust nor the Academy consent to any individual sharing or otherwise disseminating such data including but not limited to any Artificial Intelligence (AI) platform. Any breach of data protection and/or confidentiality including by the use of AI platforms may constitute a breach of contract and Trust/Academy policies, and lead to disciplinary action.

10.7 All data collected and/or processed under this policy, particularly the data referred to at *Sections 10.3 and 10.4*, will be handled in accordance with our Data Protection Policy, Privacy Notice and the requirements of the UK GDPR.