

Sexual Harassment Policy and Procedure

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WeST Vision, Mission and Values

[Westcountry Schools Trust - Our Vision, Mission and Values](#)

Providing Accessible Formats

This policy has been written in a dyslexia accessible format, which can also support the needs of other neurodiverse groups. If you are unable to use this document and require it in a different format, please contact Human Resources who can provide alternative accessible formats by request.

WeST Policy Suite

All Trust HR Policies are accessible via the WeST Staff Portal. Please contact your local administrative office or Human Resources for log-in details.

HR Helpline: 01752 891754 ext. 1765

HR Email: HR@westst.org.uk

Policy quick read

- WeST is committed to a safe, respectful, and inclusive work environment with zero tolerance for sexual harassment.
- The policy outlines steps to prevent sexual harassment and ensure a safe working environment, in compliance with the Worker Protection Act 2023. It applies to all employees, volunteers, workers, contractors, and third parties.
- The policy aims to educate staff, foster a harassment-free culture, and provide procedures for managing harassment. All incidents are taken seriously and investigated promptly.
- Sexual harassment includes any unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating environment. Further examples of what specific behaviours that constitute sexual harassment can be found in APPENDIX 1.
- WeST must take all reasonable steps to prevent sexual harassment, including by third parties. Preventative measures include regular risk assessments. A full breakdown of the proactive measures proposed and/or adopted by WeST as part of their duty of care can be found at: APPENDIX 2.
- Leadership and staff have responsibilities to raise awareness, challenge harassment, and report incidents. Everyone is encouraged to report any incidents of sexual harassment to their manager or HR, who will provide support and ensure reports are taken seriously and investigated promptly. All staff are protected from intimidation, victimisation, or discrimination for making a complaint or assisting in an investigation of sexual harassment. Retaliation is considered a disciplinary offense.
- Recipients of harassment should report concerns to their manager or HR. If able, they may ask the perpetrator to stop. Informal discussions with HR are encouraged if direct confrontation is ineffective.
- Those who may have harassed someone should take responsibility, stop the behaviour, and report incidents to their manager or HR.
- The reporting process is made as easy as possible, with various methods available; these different methods recognise that each individual who experiences sexual harassment will have different needs and might desire different outcomes. Individuals should choose the reporting mechanism(s) that they feel most comfortable with, whether informal or

formal through internal routes, or reporting to an external third party including the Police. WeST retains the right to investigate concerns, even if anonymously reported or withdrawn.

- Internal investigations will be fair and impartial. Confidentiality will be maintained as far as possible, with information shared only when appropriate. However, information provided may be used in subsequent HR processes, such as disciplinary hearings, and could be shared with the alleged perpetrator or used in legal proceedings. External agencies may be involved. Breach of confidentiality may result in disciplinary action.
- Written records of all requests and meetings will be kept.
- Procedural guidance and confidential support are available from HR and the employee assistance programme. Anyone affected by sexual harassment at work can also seek external advice, as detailed here: [Support for Employees](#)

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1. Delegation of Authority

The Trust is committed to ensuring a consistent, fair, and equitable approach in all staffing matters, and will not discriminate either directly or indirectly on the grounds of an employee's gender, age, disability, gender re-assignment, marital or civil partnership status, pregnancy, maternity status, race (including colour, nationality and ethnic or national origins), religion or belief, sex and sexual orientation.

In order to achieve this aim, there needs to be a clear delegation of authority throughout the structure of the Trust and for this purpose the term "Responsible Officer" shall apply as per the levels below:

Delegation Key	
Line Manager	Person with formal line management responsibility as defined within the job description.
Level One	If the employee is based within a school, the person with authority to act will be a Trust Headteacher, or an appropriate senior member of staff from the Trust Executive Leadership Team If the employee is based within the Core Services Team, the person with authority to act will be a member of the Executive Leadership Team If the employee is a Headteacher the person with authority to act will be a Director of Education If the employee is a member of Executive Leadership Team, the person with authority to act will be the CEO, unless they have acted as the Line Manager, in which case the person with authority to act will be the Chair of the Trust If the Employee is the Chief Executive Officer, the person with authority to act will be the Chair of the Trust
Level Two	Where Level One was the Headteacher the person with authority to act will be the Director of Education

	Where Level One was a member of the Executive Leadership Team the person with authority to act will be the Chief Executive Officer Where Level One was the Chief Executive Officer or the Chair of the Trust, the matter will be referred to a Trustee Appeal Panel
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The Trust reserves the right in exceptional circumstances to vary the composition of the delegated authority / panel in order to ensure that meetings proceed without undue delay. In these circumstances the Trust will ensure that the responsible officer maintains appropriate standards of separation and confidentiality.

2. Introduction

Westcountry Schools Trust (WeST) are committed to creating a safe, respectful, and inclusive work environment for all. We do not tolerate sexual harassment at any level. This policy outlines our commitment to preventing sexual harassment and the steps we will take to ensure a safe working environment, in compliance with the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the strengthened duty under the Employment Rights Act 2025

This policy applies to all employees. It also applies to all volunteers, workers, contractors undertaking work on behalf of the trust and third parties interacting with the trust. These groups will be collectively referred to as 'individuals' within this policy. This Policy will be communicated to all staff on a regular basis using a variety of methods including induction, training, information and publicity, team briefings, departmental meetings and via the Whistle.

All individuals should be prepared to take appropriate action if they observe or have evidence that a colleague is being subjected to sexual harassment of any kind within the context of the workplace. This includes any unwanted conduct that occurs in the course of a person's work and which takes place at their place of work, including in their home while working from home, on their commute, or at/while travelling to a place which is not their place of work if they are there for any reason related to their work, including for a work- related social event, business trip, school trips, training sessions or conferences.

We recognise that certain vulnerable or minority groups may be more at risk from sexual harassment. Where a person has more than one protected characteristic, they may experience harassment linked to more than one aspect of their identity. This is intersectional harassment. This Policy is not fully intersectional and must be read in conjunction with the Bullying and Harassment (Dignity at work) and Equality, Diversity and Inclusion Policies for further guidance on other forms of discrimination.

To preserve and protect a positive working environment which fosters a 'speak-up' culture WeST has other existing policies which should also be read alongside this policy and that set clear standards of conduct which must be observed and enable employees to raise concerns. These include the Employee Code of Conduct, The Bullying, Harassment and Discrimination

Policy, The EEDI Policy, The Grievance Policy & Procedure and the Whistleblowing Policy. All policies referenced throughout this document are accessible via the staff pages of the WeST website.

3. Purpose and Scope

The aim of the Policy is to prevent sexual harassment, respond to incidents that arise and take action to effect long-term change by:

- educating all staff about sexual harassment and their role in developing a culture free from harassment;
- fostering a working environment that supports the dignity and respect of all and is free from any form of discrimination, bullying, harassment, and violence, including gender-based violence;
- where harassment does occur, providing a process and procedure for dealing with it to ensure it is properly managed;
- capturing learning from what happened to help create an environment free from harassment;
- monitoring progress around achieving a workplace free from harassment; and
- building continuous improvement into the culture at WeST.

WeST will not tolerate any form of sexual harassment in the workplace, and will treat all incidents seriously and promptly by investigating all allegations of sexual harassment. There is no time constraint around reporting an incident of sexual harassment under this Policy and also the Grievance and Disciplinary Policies and Procedures.

Nobody will be victimised for making a complaint of sexual harassment or for helping another person to make such a complaint. This means that anyone who makes such a complaint or who helps someone to make such a complaint, for example by giving evidence or information, will not be treated badly because of their actions. No one will be subject to disciplinary action or to any other detriment if their complaint is not upheld unless it is found to be malicious.

4. Definitions

Sexual harassment includes any unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. This can be verbal, non-verbal, or physical and applies regardless of the perpetrator's intent. Further examples of what specific behaviours that constitute sexual harassment can be found in **APPENDIX 1.**

Anyone can be a victim of sexual harassment, regardless of their sex, sexual orientation or gender identity or that of the harasser. Sexual harassment may also occur between people of the same sex. WeST recognise that sexual harassment often arises as a form of violence against people of female gender, however, sexual harassment can also be a form of violence targeted at males and those with non-binary gender identities.

Sexual harassment is often a manifestation of power relationships and frequently occurs within unequal relationships in the workplace, for example between manager or supervisor and a more junior colleague, or a longstanding employee and a new joiner. It can arise as the result of sexism and power inequalities between women and men. In cases where sexual harassment is found to have occurred, such abuses of power will be taken into account in deciding what disciplinary action to take.

5. Proactive Duty

As an employer WeST will take "all reasonable steps" to prevent sexual harassment, considering the unique circumstances of their workplace, including size, sector, and resources. This duty extends to preventing harassment by third parties including customers, suppliers, clients or visitors to any WeST premises. Any instance of work-related sexual harassment should be reported in line with this policy, regardless of who the alleged perpetrator is.

We act in accordance with the EHRC's Guidance on sexual harassment and employer's liability including for third parties: <https://www.equalityhumanrights.com/guidance/sexual-harassment-and-harassment-work-technical-guidance?v=PR>.

If a worker believes that WeST have not fulfilled their duty, then a worker can report concerns directly to 'The Equality & Human Rights Commission (EHRC)'. The EHRC can take enforcement action against an employer that has not complied with the duty to prevent sexual harassment.

6. Preventative Measures

In compliance with the Worker Protection Act 2023, and the Employment Rights Act 2025 WeST commit to the following actions.

- Conducting regular risk assessments to identify and mitigate potential harassment risks (Available at **APPENDIX 3**)
- Implementing and maintaining a specific policy on sexual harassment, including third-party harassment
- Ensuring all policies are actively enforced and supported by mandatory, regularly refreshed training; this includes training within induction for all new staff.
- Foster an inclusive culture that promotes speaking up and reporting harassment without fear of victimisation
- To not use NDAs that prevent employees from reporting sexual harassment, discrimination, or other related misconduct

A full breakdown of the proactive measures proposed and/or adopted by WeST as part of their duty of care can be found at: **APPENDIX 2**.

7. Responsibilities of Leaders and Managers at WeST

- All those with line management responsibility must ensure that all workers are aware of this policy and understand their own, and the organisation's responsibilities. Additional training on sexual harassment and/or coaching on how to approach difficult conversations will be provided to line managers if a need is identified.
- Leaders and Managers have a particular duty to ensure that, within their area of responsibility, everyone is treated with dignity and respect by:
 - Always challenging any unacceptable or questionable behaviour that they become aware of even if they are not directly affected.

- Being aware of behaviour and language that can cause offence including jokes and banter, and if necessary, remind workers of the expected standards.
- Responding to complaints of sexual harassment swiftly, sensitively and objectively using specified procedures as appropriate based on <https://www.acas.org.uk/sexual-harassment/handling-a-sexual-harassment-complaint>
- Ensuring the focus in dealing with complaints is to understand what has happened and address that proportionately. Where necessary, this may involve acknowledging failings within the school or trust; accepting fault and blame where appropriate.
- Dealing directly with third party perpetrators (such as service users, parents, students, visitors or contractors) outlining actions which may include withdrawing service, terminating a contract or banning from the premises if behaviour is not moderated.
- Ensuring that this policy is followed.
- A suitably trained member of HR will assist any line manager in dealing with complaints of sexual harassment.
- All complaints of sexual harassment must be dealt with in accordance with WeST's data protection Policy.
- Leaders and managers at WeST are expected to set a positive example through their behaviour. Any inappropriate actions or responses to such behaviour, or misuse of positional power, will be seen as condoning harassment and will be treated as a serious violation of this Policy, subject to the Disciplinary Policy.
- If a line manager does not actively enforce this Policy within their area of responsibility or fails to address sexual harassment when it comes to their attention, it may be considered a breach of this policy and their employment contract, potentially leading to disciplinary action.

8. Responsibilities of staff

- All staff have a duty to assist in the creation of a safe working environment, where sexual harassment is not tolerated by:

- Ensuring they understand what sexual harassment is.
- Being aware of how their behaviour may affect others.
- Challenging unacceptable behaviour wherever possible and as long as it is safe to do so. Forms of intervention include: calling out behaviour that is unacceptable when it happens and addressing the person who is behaving inappropriately; taking steps to defuse the situation/redirect those involved; checking in with the recipient of the behaviour after it has taken place, assuring them that what occurred was not acceptable.
- Reporting incidents of sexual harassment when witnessed and/or support recipients of sexual harassment in reporting it.
- Co-operating in investigations into alleged sexual harassment.

9. Reporting and Procedures

Everyone is encouraged to report any incidents of sexual harassment to their manager, senior leadership or HR, who will provide support to those affected and ensure that all reports are taken seriously and investigated promptly and thoroughly.

All staff shall be protected from intimidation, victimisation or discrimination for making a complaint of sexual harassment or for assisting in an investigation. Retaliating against a worker for complaining about or assisting in an investigation of sexual harassment is a disciplinary offence.

The language used for the purpose of this policy makes reference to 'Victim' and 'Perpetrator', however we recognise that this may not always be appropriate, and/or such terminology may cause distress to individuals involved. The preferred terminology to be used will therefore be established with individuals involved on a case-by-case basis.

What should I do if I am the recipient of unwanted conduct of a sexual nature?

You can report any concerns to your manager, senior leadership or HR. In some cases, you may feel able to ask the perpetrator to stop the behaviour. If that is ineffective, or you do not feel able to do this, an informal discussion with HR can be a useful way of talking through what has happened and deciding what further action you wish to take. Such discussions will be dealt with

in confidence. However, if the harassment is of such a serious nature because of the high immediate risk to the safety of the complainant, or others with whom the perpetrator may come into contact, WeST as the employer may need to take further action. Information on external support that is available will be provided whenever you report sexual harassment.

Recipients of sexual harassment are encouraged to speak up and report any instances of sexual harassment, victimisation or discrimination experienced. Reporting is an important step in preventing the behaviour and is important to the recipient's ongoing health, safety and wellbeing, and will enable them to access appropriate guidance and support. However, we recognise that there may be many reasons that someone who has experienced sexual harassment may not report it and are committed to making it easier and less stressful to do so.

What should I do if I have witnessed unwanted conduct of a sexual nature?

You do not have to be the recipient or target of sexual harassment to raise a concern or make a complaint. If you see it happening or become aware of it, you should speak up and report it provided it is safe to do so and you feel able to do so. We recognise that past experience of sexual harassment may make this difficult. Your actions can be important in helping create a culture free from sexual harassment and ensuring that there are no bystanders. Tackling sexual harassment is everybody's responsibility. Those who have witnessed sexual harassment can use the reporting mechanisms outlined below.

What should I do if I have sexually harassed someone or been accused of doing so?

If you have, or are concerned that you have, engaged in unwanted conduct of a sexual nature (intentionally or otherwise), you should take responsibility for your actions as soon as you can, as they may amount to sexual harassment. This is important as it may prevent the recipient of your behaviour from experiencing further trauma.

If you have been questioned, accused, charged or prosecuted for a criminal offence (including one of sexual harassment, assault or rape) you must report this to us immediately. This applies even if you deny the alleged conduct or do not consider the alleged conduct to be connected to work. A failure to report this could amount to gross misconduct in itself.

Alleged sexual harassment may be investigated by us under this process, our disciplinary policy or otherwise and could also amount to an act of misconduct/gross misconduct or otherwise result in your dismissal (including summary dismissal).

If, at any time, you are asked (verbally or in writing) by someone who considers your behaviour to amount to sexual harassment to stop, you must not persist in that behaviour. You should also report the incident to your manager or HR. In such circumstances, it is important that you reflect on your behaviour and the way in which it is perceived and experienced by others. Remember that everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. An authentic apology and genuine assurance that the behaviour will not be repeated may be enough to end the matter.

However, in some cases a direct apology without a third party to facilitate may not be appropriate and advice from HR should be sought in advance. You should be sensitive to the reaction/potential reactions of the recipient. If the recipient refuses to accept your apology or is upset further by it, you should not persist in contacting them. You should also seek advice from and/or report your behaviour to your line manager, a senior manager or HR at this point.

Reporting Mechanisms

It is important that any concerns are reported as you may be the first to formally speak up and raise something that has been occurring for some time.

There are different ways in which you can report such behaviour; these different methods recognise that each individual who experiences sexual harassment will have different needs and might desire different outcomes. You should choose the reporting mechanism(s) that you feel most comfortable with.

As the employer, WeST retains the right to investigate concerns that we become aware of even if these are based on anonymous reporting or complaints are subsequently withdrawn. Our ability to investigate and take action may be restricted in these circumstances, and we will act with respect and empathy towards any person who has raised a concern but no longer wishes to be involved in the process. As an employer, we may however still pursue matters if it is

appropriate and proportionate to do so. This is important to ensure that we can tackle concerns about potential sexual harassment within the organisation.

In addition, effective from 6 April 2026, the Employment Rights Act (ERA) explicitly classifies reporting sexual harassment as a "qualifying disclosure" under whistleblowing law in accordance with the Public Interest Disclosure Act (1998). Therefore, employees will also have the right to whistle blow on any sexual harassment encounters they or others have been subjected to or witnessed. This follows the same principle in that such disclosures can be past present or anticipated sexual harassment in the future. To qualify; The ERA (2025) states that a worker must reasonably believe that making a disclosure about sexual harassment is in the public interest. Please refer to the Whistleblowing Policy for details of the specific criteria where this may apply.

Informal Reporting

If a person reports sexual harassment to a manager or HR but does not want to take the matter any further, the individual receiving the complaint will keep in contact with them periodically to check whether the situation has improved.

Although the wishes of the complainant to keep the report informal will be adhered to wherever possible, there may be some circumstances where the harassment is of such a serious nature that the employer will need to take action because of the high immediate risk to the safety of the complainant, or others with whom the perpetrator may come into contact with. In such situations, the employer will put in place appropriate safeguards, such as instigating a formal investigation with suspension, or transfer of the alleged perpetrator, to prevent further harassment or victimisation of the complainant.

Formal Reporting

If informal action does not stop the sexual harassment, or a formal report is made, a formal procedure should be initiated in line with the grievance process outlined in the Grievance policy.

The process allows both the complainant and the person against whom the complaint is made the right to be accompanied by a trade union representative, or a colleague, or any other person of the complainant's choosing.

A person who believes that they have been sexually harassed and who decides to formally report it should, in the first instance, report the alleged act or acts to their line manager. If they do not feel that the line manager is an appropriate person, for example if the line manager is the person doing the harassment, the report should be made to a senior manager or HR. Where possible, the individual should set out in writing details of the complaint including dates and times of the alleged incident(s) and an account of the behaviour. They should also include details of what their desired outcome is.

All complaints will be handled and investigated in a timely and confidential manner. The complaint will be acknowledged within 3 working days and the complainant invited to an informal meeting with the Responsible Officer for their setting at the earliest possible opportunity and certainly within 5 working days of reporting the alleged act or acts. Following this initial meeting, the Responsible Officer may instigate an investigation to be undertaken by another person 'the Investigator' either under the disciplinary or grievance policy; whichever is deemed to be most appropriate to the circumstances.

The Investigation

Whether involving the complainant or the alleged perpetrator, all cases will be dealt with in a fair and impartial manner, including having the right to be accompanied to any meetings by a trade union representative or a work colleague. Where appropriate, requests to bring an alternative companion to support the complainant's wellbeing will also be considered. It is recognised that the complainant may prefer to talk to an investigator of the same sex and we will endeavour to facilitate this where requested.

At the outset of the investigation the position concerning confidentiality will be explained to participants before they take part. In practice, there will be a requirement for those giving evidence (including complainers and alleged perpetrators) to the investigation to keep what they have said in the process confidential (though they will be given details of those in the organisation that they can speak to for support). It will also be explained how the information they provide in the process may be used and shared in the future.

While the sensitive nature of information will be respected and it will be managed accordingly, participants should understand that the information may be used as part of subsequent HR processes if required. For example, it could form part of a disciplinary management pack for a hearing in which case the information, including notes from any witness interviews would be shared with the alleged perpetrator. It may be that materials are ultimately used as evidence in legal proceedings which could be held in a public forum. Within the organisation, confidentiality will be maintained as far as possible, with information only being shared when appropriate.

We may at times need to involve external agencies where a criminal offence may have been committed, or if maintaining confidentiality would pose a risk to the complainant or to others. In all other circumstances, breach of confidentiality will be viewed seriously and may be a disciplinary offence.

Reporting to an External Third Party including the Police

A person may also report concerns about sexual harassment to the police when they consider it appropriate to do so. Personal safety is paramount and where a person has any concerns about criminal behaviour we recommend reporting to the police.

Further information and guidance on understanding your rights can be found here: [Specialist help and support - Sexual harassment - Acas.](#)

10. Timescales

The timescales detailed in the policy are in accordance with the statutory requirements and best practice. They must therefore be adhered to unless both parties have agreed to an extension of time.

There may be a number of reasons why the time limits specified are too short and an extension may be required. Where an extension to the time limits is agreed, a written record of this decision should be made along with reasons.

11. Confidentiality

Any parties affected by or involved in the application of this policy will be expected to maintain an appropriate level of confidentiality. Breaches of confidentiality will be taken seriously,

especially if they hinder the application of the policy. Failure to maintain confidentiality may result in action being taken under the disciplinary policy arrangements.

Disclosure of information may also be a breach under the Data Protection Act (2018) and may lead to action being taken under the provisions of that Act, in addition to action being taken under the disciplinary policy.

12. Recording of Information

A written record must be made of all requests and meetings held during the application of this policy. Those involved in each meeting will be provided with a copy of any records made.

The Responsible Officer or their delegate will ensure there is a full and comprehensive file of the process which should include all statements, records and evidence referred to in the rationalising of the decision outcome. At the end of the process the file should be passed to HR who will ensure that it is stored confidentially, in accordance with the Data Protection Act (2018) on the personnel file.

13. Support for Employees

Procedural guidance relating to this policy is available from HR. Where a referral to Occupational Health or the counselling service is necessary, this should be made by the employee's line manager.

We recognise that sexual harassment can cause stress, anxiety or other mental health as well as physical health problems. Deterioration in job performance which results from sexual harassment will be dealt with as a health-related issue and the person will be encouraged to seek help and support under the terms of this policy.

There will be no discrimination against individuals suffering from stress caused by sexual harassment. We also recognise that those who may be accused of sexual harassment, witnesses to incidents or otherwise affected such as by being a by-stander, can experience stress, anxiety or other mental or physical health problems. We have a duty of care to support all staff affected by these issues.

Confidential support, practical information and advice is also available for WeST's employee assistance programme Care First: www.carefirst-lifestyle.co.uk (User name: Westcountst / Password: Wellbeing1234). We may where appropriate, refer the individual to an occupational health provider, advise they seek advice from their GP or refer them to an independent doctor, all in line with our Managing Sickness Absence Policy.

To help you understand your rights and options, employers and anyone affected by sexual harassment at work can also seek external advice:

- [Specialist help and support - Sexual harassment - Acas](#)
- [Sexual harassment at work advice | Rights of Women](#)
- [get legal advice](#)
- talk to your trade union or employers' association if you have one
- [Equality Advisory and Support Service](#) (EASS) For advice on discrimination issues: Phone 0808 800 0082
- [Protect](#) Confidential advice for individuals who have witnessed wrongdoing in their workplace but are unsure how to raise their concerns: Phone 020 3117 2520

If you're struggling to cope and need someone to talk to, you can contact:

- [Samaritans](#)
- [LGBT Foundation](#)

Help after sexual assault or rape

- [Galop](#) – LGBT+ sexual violence support
- [The Survivors Trust](#)
- [SurvivorsUK](#) – male rape and sexual abuse support
- [Victim Support](#)
- [Find out about other help after rape and sexual assault on the NHS website.](#)

Contacting the police:

- call 999 if you or someone else is in immediate danger
- call 101 if it's not an emergency
- [Contact us | Police.uk](#)

When you're reporting a crime, you can ask to speak to a specialist officer who's trained to deal with sexual violence.

14. Review and updates

This policy will be reviewed regularly and updated as necessary to ensure compliance with legal requirements and best practice.

We are committed to ensuring that this policy and all related procedures are effective in preventing sexual harassment and in dealing with incidents where they do occur. Essential to achieving this aim is continuous review and evaluation.

The first review was carried out at not more than 12 months. Subsequent reviews will take place biennially. WeST will also periodically monitor how successful it is in creating a workplace free of sexual harassment by other means which will include confidential staff surveys, training, raising awareness of harassment and bullying in general and undertaking risk assessments.

Appendix 1 – EXAMPLES OF SEXUAL HARASSMENT

The following examples are intended to provide illustrations of the types of behaviours that will constitute sexual harassment. They are not exhaustive – there are many more examples of such behaviour. Importantly, sexual harassment can arise in various forms and to different degrees; therefore, it's important to recognise that some of examples listed below are also criminal offences. As part of the review process for this policy, we will ensure that the specific examples given in this policy are updated so as to reflect the specific work environment in which our staff operate taking account of the composition of our workforce and the types of work undertaken. Certain types of harassment may be linked to more than one aspect of the recipient's identity. This is intersectional harassment. Examples that illustrate this are included here, but this Policy is not fully intersectional and must be read with the Bullying and Harassment Policy for further guidance on other forms of discrimination.

Verbal conduct

- Banter
- Mimicry
- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories, jokes or pranks
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending/sharing sexually explicit messages/images (by any medium)
- Coercion
- Gaslighting (a form of covert emotional abuse)

Non-verbal conduct

- Display of sexually explicit or suggestive material or imagery
- Acts affecting a person's surroundings
- Posts or contact on social media
- Sexually suggestive gestures
- Facial expressions

- Whistling
- Leering
- Predatory behaviour
- Indecent exposure

Physical harassment

- Unwanted physical contact of a sexual nature – for example, brushing up against someone or hugging, kissing or massaging them.
- Sexual assault
- Rape

Appendix 2 – WESTCOUNTRY SCHOOLS TRUST DUTY OF CARE

The law imposes a duty of care on employers to provide a safe system of work for all staff. This includes a specific obligation to protect the health, safety and welfare of their staff and others who might be affected. In discharging this legal duty, WeST recognise that there are certain measures that can help to prevent sexual harassment in the workplace including; ensuring that adequate measures are in place to tackle sexism and address inequality between women and men and people with non-binary identities, as well as other forms of discrimination including racism, ableism, homophobia, transphobia and ageism, and to prevent the conditions which cause and exacerbate high levels of stress. We are committed to the adoption and operation of such measures, including:

- **Improving the gender balance at all levels of the organisation:** At WeST we will be constantly analysing our data in order to compose a narrative which will include the reasons behind any gap and potential plans to address the gap and achieve improvement. [Westcountry Schools Trust – Gender Pay Gap](#)
- **Improving diversity and inclusion at all levels of the organisation:** Mandatory training for all staff on E,D&I.
- **Staff survey:** Ascertaining how working conditions impact on all staff and identifying any areas of concern. To this end, an annual staff survey will be conducted, the results of which will be consulted on to identify any action that needs to be taken.
- **Data monitoring:** Staff data related to sickness absence rates and turnover will be carefully monitored in accordance with the Absence Management Policy to identify patterns of behaviour as it is recognised that they can be linked to high stress levels and associated behaviours which may be indicative of sexual harassment.
- **Risk assessments:** Giving consideration to factors that can increase the risk of sexual harassment including: work-place stress, power imbalances, job insecurity, lone working, customer-facing or student facing duties, and lack of diversity and inclusion in the workforce.
- **Good management practices:** Including anti-discrimination management practices, competent and respectful people management, awareness of the conditions that can allow sexual harassment to become prevalent and consistency in taking appropriate preventions and

interventions (including prompt and unambiguous action to visibly demonstrate that concerns regarding sexual harassment will be taken seriously).

- **Equality impact assessments:** These assessments take into account of the differential effects of organisational policies, procedures and practices on certain groups or individuals depending on sex, sexual orientation, and gender identity, race, age, disability, religion or belief and pregnancy and maternity and follow-up actions to address these effects and to increase diversity and inclusion within the workforce. This will include recognition of intersectionality.
- **Continuous awareness-raising:** Promoting awareness and understanding about the nature and impacts of sexual harassment, common reactions to sexual harassment and the requirement of respectful behaviour for all staff to create a culture free from harassment and identify and address incidents when they occur. Awareness of this policy, a copy of which will be made available to all staff and members of the public on the WeST website: <https://www.westst.org.uk/>. All new workers will also be sign-posted to the policy on induction.
- **Executive Leadership champions:** This Policy is supported and championed by WeST's Executive Leadership team. They will be actively involved in promoting it, attending staff training and being vocal champions of the policy.
- **Appropriate and targeted training:** All staff including Senior Leaders and Managers at all levels of the organisation will be directed to undertake Sexual harassment training staff. The training is mandatory for all staff and will form part of the induction for new staff and staff receiving promotions or moving to new roles. Training will be monitored and evaluated as part of annual review of this Policy.
- **Monitoring progress:** Continued assessment of the Policy and WeST's progress against the above objectives will be transparently reported on and discussed, including in Staff Forums, team meetings, at Trust board meetings and as an agenda item within the JCNC group meeting.

Appendix 3 – WESTCOUNTRY SCHOOLS RISK ASSESSMENT

	Westcountry Schools Trust (WeST) Risk Assessment	
Operation/Activity: Ensuring that the trust takes ALL reasonable steps to PREVENT sexual harassment		

Name of member of staff:	All staff of all genders	Date of risk assessment	February 2025 / Reviewed April 2026
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Hazards associated with the activity/operation.		
LIKELIHOOD	1	Unlikely
	2	Possible
	3	Quite Possible
	4	Likely
	5	Very Likely
SEVERITY	1	Negligible
	2	Minor
	3	Significant
	4	Major
	5	Catastrophic
RISK RATING	1-3	Low
	4-7	Medium
	8-10	High

Risk	Generic Risk Control Measures	Inherent risk			Additional Control Measures	Residual risk		
		Likelihood	Severity	Risk Rating		Likelihood	Severity	Risk Rating

1. Sexual harassment occurring in the day-to-day workplace; this includes onsite working and remote where work is agreed to be undertaken from home. 2. Sexual harassment occurring on school trips (day trips and overnight stays). 3. Sexual harassment of an individual previously in a consensual relationship with another staff member 4. Sexual harassment of an individual by their current partner who is also a colleague.	- HR Policies are kept up to date and current and a regular review cycle and in accordance with any new legislation. - A review of policy in November 2024 identified the need to create a stand-alone Sexual Harassment Policy in response to the new duty to PREVENT sexual harassment. The full Sexual Harassment Policy was published in Sep 2025 to demonstrate a commitment to the prevention - in and work in conjunction with and strengthen existing policies which are relevant within this topic (Bullying & harassment (Dignity at Work), Equality, Diversity & Inclusion, Code of Conduct, Grievance procedure, Disciplinary procedure) - EEDI and Bullying, harassment and discrimination policies updated in September 2025 and provide specific reference and sign-posting to sexual harassment. - Sexual Harassment Policy published in a public area on the WeST website - HR Policies are accessible to all staff within the trust via ESS. - Trust induction materials to include signposting to Sexual harassment policy (in addition to the already covered code of conduct) as well as completion of mandatory e-learning. - Questions regarding sexual harassment added to annual staff survey to understand the current climate - A preventative strategy continues to be b developed and partially informed by the staff survey results May 2025. This supports the pro-active approach to Sexual harassment at WeST. - Promoting a culture of respect and inclusivity through our values	3	3	6	- Ongoing: Pro-active reporting of sexual harassment cases to the board of trustees as part of the HR Metrics - On-going: Publish prevent sexual harassment articles in the whistle as well links from ESS - On-going: Training – e-learning for all staff - On-going: Training – Proposed SLT training; discussions. - On-going: School Leaders provide briefing to their SLT's, including slides provided by Trust - Consider – dignity at work/E,D&I and Sexual Harassment signs in staffing areas, including posters in wash rooms? - On-going: Consider employee inclusion network groups; Diversity Reference group - On-going: Monitoring of response to sexual harassment in staff survey results - On-going: Creation of a speak up culture / promotion of this internally. - Use the answers from the staff survey (available in May 2026) to inform future strategy and objectives.	2	2	4
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	- Disclosure of inter-staff relationships a requirement of the code of conduct							
5. Sexual harassment of job applicants during a recruitment process	- Recruitment and selection policy is kept up to date and current - - A preventative strategy continues to be developed and partially informed by the staff survey results May 2025. This supports the pro-active approach to Sexual harassment at WeST. - Recruitment and selection Policy updated in September 25 and now includes reference to sexual harassment. - EEDI and Bullying, harassment and discrimination policies updated in September 2025 and provide specific reference and sign-posting to sexual harassment. - Sexual Harassment Policy published in a public area on the WeST website	2	3	5	- training required for recruiting managers -	2	1	3
6. Sexual harassment of contractor / volunteers by a member of WeST staff	As for 1-4	2	3	5	- On-going: Consider what site induction any contractor / volunteers receive, including a statement about what they can expect from WeST staff and how to report behaviours which fall below this standard? -	2	2	4
7. Sexual harassment of a member of WeST staff on secondment at another workplace	As for 1-4	3	3	6	- Request confirmation of the action plan of the host organisation on preventing sexual harassment and how these measures are communicated to new starters (e.g., relevant policy / training). Store this information on the individual's personnel folder. - Secondment policy in development for publication September 2026 will specifically address this. - Where the above is not available or forthcoming, communicate to the member of staff relevant policy sections	2	2	4

8. Sexual harassment by a third party towards a WeST member of staff (e.g., parent / contractor / visitor)	- Code of conduct for parents - Users of community sports, signed agreements in place, whether individually or for groups - Service level agreements in place for contractors; both for on-going providers and those used on an ad-hoc basis. - A preventative strategy being developed and implemented to be pro-active in the approach to Sexual harassment at WeST. - Promoting a culture of respect and inclusivity through our values - Questions regarding sexual harassment added to annual staff survey to understand the current climate. Data from May 2025 used to inform overview of current climate and future strategy.	3	4	7	- On-going: Consider what site induction is received for contractors and the mutual expectations of behaviour. - On-going: Request copies of relevant policies from organisations contractors being used through to understand if they have fulfilled their duty to prevent sexual harassment - On-going: Re-visit contracts for community sports provisions to consider including specific references to sexual harassment and the removal from sites/suspension of contract. - On-going: Monitoring of response to sexual harassment in staff survey results	2	2	4
9. Sexual harassment of an individual by a more senior person	As for 1-4	2	4	6	- On-going: Consider if further policy review needed to specifically address this. - On-going: School Leaders provide briefing to their SLT's, including slides provided by Trust - On-going: Specifically addressing power dynamics within the new Policy and encouraging a 'speak-up' culture around this. - On-going: Monitoring of response to sexual harassment in staff survey results	1	2	3
10. Sexual harassment of an individual with a vulnerability making them reluctant to report sexual harassment (e.g., on a zero hours contract / on probation / at risk of redundancy) / with a learning disability.	As for 1-4 - Specifically addressing intersectional Harassment in the Sexual Harassment Policy, linking to other relevant policies.	2	4	6	- On-going: Consider if further policy review needed to specifically address this. - On-going: Specifically addressing power dynamics within the new Policy and encouraging a 'speak-up' culture around this - On-going: Induction Training on sexual harassment; consider if this needs to be extended to workers on casual engagements, i.e., Exam Invigilators?	2	2	4

11. Sexual harassment by a student	As for 1 – 4 plus - Code of conduct for students in place	4	3	7	- On-going: Review and act on complaints as they arise, addressing any gaps in process. - On-going: Consider addressing within PSHE	2	3	5
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Assessed By: Jenna Gipson – Head of HR Employee Relations	Date: 7 April 2026	Reviewed by: Trust SLT Head Teachers / Principals	Date: 6 July 2026
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Additional points for consideration

Policy History

Policy Date	Summary of change	Contact / Responsibility for Policy	Version/ Implementation Date	Review Date
2025	Policy Implemented	HR	September 2025	Annual Review
2026	Policy updates under The Employment Rights Act 2025 and ERA 2025 (Whistleblowing). Review and updating Risk Assessment	HR	September 2026	Bi-Annual Review or otherwise as required