



Education Trust

Inspiring the individuals of today, for a better society tomorrow,
“Aspire, Belong, Collaborate”

RET SEXUAL HARASSMENT PREVENTION and ACTION IN THE WORKPLACE POLICY

Review Frequency	Annual
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Policy Statement

The Board of Trustees (hereafter referred to as the Board) of Riviera Education Trust (hereafter referred to as the Trust) is committed to providing a safe, inclusive, and supportive working environment free from sexual harassment, bullying, or discrimination. This policy applies to all employees, volunteers, trustees, governors, students, and third-party contractors working within any RET-affiliated environment.

Everyone has a part to play in being aware of, preventing, and dealing with sexual harassment. The Policy sets out the expectations for the behaviour of our staff and what we can do to protect all staff from sexual harassment. It is supported by the senior leadership within the organisation, and they will all be visible champions of this Policy.

Purpose

The aims of this policy are to:

- **Prevent** sexual harassment in the workplace.
- **Promote** a culture of respect, dignity, and equality for all.
- **Respond** promptly and effectively to any concerns or allegations.
- **Ensure** accountability and continuous improvement in addressing sexual harassment.

Scope

This policy applies equally to all Trust employees, regardless of their age, disability, sex, sexual orientation, race, religion or belief, gender reassignment, pregnancy and maternity, marriage, and civil partnership. Care will be taken to ensure that no traditionally excluded groups are adversely impacted in implementing this policy. This policy also extends to Trust affiliates including agency workers, student Teachers, Trustees and Governors, volunteers, and contractors.

We recognise that individuals with certain protected characteristics—and especially those with more than one intersecting characteristic—may be at increased risk of experiencing sexual harassment. The Trust is committed to identifying and addressing these heightened risk.

Linked Policies

This should be read in conjunction with the following policies, and other relevant policies that may apply:

- Disciplinary Procedure
- Grievance Procedure
- Acceptable behaviour in the workplace



- Equality and Diversity Policy

This policy covers behaviour that occurs in the following situations:

- Directly within the workplace
- A situation occurring outside of the normal workplace or normal working hours, but is directly related to work, such as residentials or social functions
- Outside of the workplace, but involving a colleague, or other person connected to the Trust, including on social media

Sexual harassment involving students is handled under a separate policy, RET Sexual Violence and Sexual Harassment Policy, and can be found on the shared drive, alongside the Trust's Safeguarding and Child Protection Policy.

Legal Framework

Sexual harassment is unlawful under the Equality Act 2010. Employers have a legal duty to prevent sexual harassment and take action when it occurs. This policy also supports RET's commitment to human rights and the welfare of all staff. This policy also reflects the employer's proactive duty to prevent sexual harassment under the Worker Protection (Amendment of Equality Act 2010) Act 2023.

Definitions

Sexual harassment includes both unwanted conduct of a sexual nature and unwanted conduct related to sex, as defined by the Equality Act 2010. This includes, but is not limited to:

Verbal Conduct

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

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

Responsibilities

Employer Responsibilities:

- Ensure the dissemination of this policy and provide sufficient training.
- Respond to all concerns or complaints promptly, sensitively, and in line with this policy. Failure to act may result in disciplinary action
- Maintain systems for confidential reporting and support.
- Continuous review of organisational culture.

Employee Responsibilities:

- Treat all colleagues with respect and refrain from engaging in or condoning any form of harassment.
- Report any incidents of harassment promptly.

Manager Responsibilities:

- Be proactive in preventing harassment and lead by example.
- Respond to complaints sensitively and in a timely manner.

Preventative Measures

- Take all reasonable steps to prevent sexual harassment, in line with our proactive employer duty
- Training for Managers on sexual harassment, ensuring all staff understand what it is, how to prevent it, and how to report it.
- An open-door policy encouraging early reporting and open discussion of any concerns.
- Clear guidelines and procedures for both informal and formal complaints.
- Risk Assessments that include consideration of factors that can increase the risk of sexual harassment including, but not limited to: work-place stress, power imbalances, lone working, parent-facing duties.

Reporting Procedure

Informal Complaints

Employees may, if they feel safe and comfortable, choose to address the behaviour directly with the individual concerned. This is entirely voluntary. Alternatively, they may seek support from their line manager, a trusted colleague, or HR.



Formal Complaints

If the behaviour persists, or the sexual harassment or victimisation is more serious, you should bring the matter to your Line Manager or HR, again A trusted colleague can support you with this.

Where possible, you should keep notes of what happened, and any written complaint should include:

- The name of the alleged harasser
- The nature of the harassment
- The dates and times when the alleged harassment occurred
- The names of any witnesses
- Any actions already taken to stop the alleged harassment (if any)

Formal complaints should be submitted in writing; investigations will follow a structured process, aiming to resolve complaints fairly and confidentially.

Anonymous Complaints

While we strongly encourage the affected individual of sexual harassment to report their concerns directly to their employer, we understand that there may be circumstances where this is not feasible. In such cases, you can call the Trust confidential voicemail line at 01803 557 190 ext. 130 and leave a detailed message. This line is monitored regularly; however, urgent or serious concerns should be raised directly with a line manager or HR for immediate support.

We reserve the right to investigate concerns brought to our attention, even if they are reported anonymously or later withdrawn. Our ability to investigate and take action may be limited in such cases, but we will handle the matter with respect and empathy toward anyone who has raised a concern. As an employer, we may still proceed with an investigation if it is deemed appropriate and proportionate to do so, as addressing potential sexual harassment within the organisation is a priority.

Investigation and Outcome

Upon receiving a formal complaint, we will take immediate action to ensure your separation from the alleged harasser, allowing for an uninterrupted investigation. This may involve temporarily transferring the alleged harasser to another work area or suspending them with full pay until the matter is resolved.

You will be invited to attend a meeting at a reasonable time and location to discuss the details of the complaint and ensure a thorough investigation is carried out. This meeting will typically take place within five working days of receiving your complaint. You have the right to be accompanied by a trusted work colleague of your choice, and you are expected to make every effort to attend. All parties involved in the investigation are required to maintain confidentiality, and any breach of this confidentiality may be addressed under the disciplinary procedure.



The investigation is normally concluded within 10 working days of the initial meeting, and the findings will be communicated to you in writing.

If you wish to appeal the outcome, you must notify the Clerk to Governors within five working days of receiving the decision. A further meeting may then be arranged, where, if possible, the Trust will ensure a more senior manager than the one who attended the initial meeting presides (unless the most senior manager was already involved).

Following the appeal meeting, you will be informed of the final decision, usually within 10 working days, and this will be confirmed in writing.

Staff shall be guaranteed a fair and impartial hearing whether they are the complainant or the alleged perpetrator.

Managing a complaint under this Policy will mirror the structure of any other Grievance Process, while also recognising the unique issues and skill sets that may be needed to properly manage a sexual harassment complaint.

If the sexual harassment involves a potential criminal offence—such as sexual assault, indecent exposure, stalking, or offensive communications—the investigator will ensure that the affected individual receives appropriate support should they choose to report the matter to the police. In these instances, we will coordinate with law enforcement regarding the investigation and any related grievance or disciplinary processes, seeking their guidance on how to ensure a fair and thorough procedure. These details will be incorporated into the disciplinary procedure as necessary.

If there is an immediate risk of serious harm, the investigator may contact the police directly and will inform the complainant of this action. In certain cases, we may also engage with the police for high-level guidance on an anonymous basis, without disclosing identities, when appropriate.

At the end of the investigation, the investigator will provide a detailed response in writing to the complainant specifying outcomes wherever appropriate. If the complaint is upheld, this will include details of the action taken to address the specific complaint and of any preventative or structural measures taken to safeguard against future incidents of a similar nature.

Appeals

Both the complainant and the alleged harasser have the right to appeal investigation outcomes within five working days of receiving the decision.

Support for Employees

Regardless of the outcome, The Trust will provide:

- Access to counselling through the Employee Assistance Programme
- External agency referrals when necessary.
- Protection from retaliation following any harassment complaint.



Witnesses of Sexual Harassment

You don't have to be the direct recipient of sexual harassment to raise a concern or file a complaint. If you witness or become aware of such behaviour, it's important to report it, as long as it feels safe and you are able to do so. We acknowledge that past experiences with sexual harassment may make this challenging, but your actions play a vital role in fostering a culture free from harassment and eliminating the bystander effect. Addressing sexual harassment is a shared responsibility, and those who have witnessed it are encouraged to use the reporting mechanisms provided above.

Third Party Sexual Harassment

Third-Party Sexual Harassment occurs when a member of our workforce is subjected to sexual harassment by someone outside the organisation, such as a parent, contractor, or member of the public, in connection with their work. Third-party harassment is unlawful and will not be tolerated by the Trust.

The law mandates employers to take reasonable steps to prevent third-party sexual harassment, and the Trust is fully committed to upholding this responsibility. Although individuals cannot bring a claim solely on the grounds of third-party harassment, failure by the employer to act may result in legal liability in other types of claims.

To prevent third-party sexual harassment, we will:

- Ensure all visitors, including contractors and parents, are made aware that harassment or discrimination against our employees is strictly prohibited.
- Include statements in correspondence, emails, and other communication to reinforce the Trust's zero-tolerance stance.

If a third party, such as a parent or contractor, engages in sexual harassment, we will take appropriate action, ranging from issuing a formal warning (for lower-level concerns) to banning the individual from Trust premises if necessary. Any criminal behaviour will be reported to the police.

Equally, we will not tolerate sexual harassment by any member of our workforce towards third parties. Such behaviour may result in disciplinary action, up to and including termination of employment.

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.

Victimisation



No one 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 simply because their complaint is not upheld.

Malicious/Fabricated Accusations:

If it is determined that the allegation was made maliciously or fabricated, the complainant will be subject to the Trust's Disciplinary Procedure. Similarly, the Trust will not tolerate unfounded public accusations labelling any individual as a bully or harasser.

Monitoring and Review

This policy will be reviewed annually to ensure compliance with current laws and best practices. The Trust will conduct regular evaluations to monitor the effectiveness of this policy, including anonymous staff surveys and data analysis on harassment incidents.

Further Information and Support Services

In addition to support you receive from the Trust when experience Sexual Harassment at work you can also:

- Visit the **ACAS** website <https://www.acas.org.uk/sexual-harassment/if-youve-been-sexually-harassed-at-work>
- Contact our **Employee Assistance Helpline** on: 0800 028 0199
- Contact your own GP
- Contact Talkworks on 0300 555 3344
- Visit [Sexual harassment at work advice | Rights of Women](#)
- Contact victim support on 0808 168 911

If you are struggling to cope and need someone to talk to you can contact:

- [Need urgent help | Mind - Mind](#)
- [Samaritans | Every life lost to suicide is a tragedy | Here to listen](#)



To report a crime:

- **Contract 999 if you, or someone else is in immediate danger**
- [Contact us | Police.uk \(www.police.uk\)](https://www.police.uk) to report a crime online



POLICY AMENDMENTS

October 24

- Policy adopted

October 25

- Clarified malicious allegation definition and disciplinary action.
- Strengthened victimisation protection statement.
- Added confidentiality reminder for all parties.
- Updated third-party harassment actions.
- Added police involvement clarification.
- Confirmed appeal rights for both parties.
- Strengthened Monitoring & Review with annual reporting.

