



HAMPSTEAD
FINE
ARTS
COLLEGE



2026-2027

Hampstead Fine Arts College

Sexual Harassment Policy

For employees, governors, volunteers, agency and casual workers, contractors (including those self-employed), visitors, parents and any other third parties

Introduction

We are committed to maintaining a workplace free from harassment, discrimination, and bullying.

We are committed to fostering a safe, respectful, and inclusive environment for all our employees and workers where everyone can thrive. Our commitment to upholding the highest standards of dignity and respect is embedded in our culture and values. We encourage open and respectful communication, valuing diverse perspectives and the unique contributions of each individual.

Sexual harassment of any kind is strictly prohibited and will not be tolerated under any circumstances. We are committed to ensuring that all employees work in an environment where they are free from any form of sexual harassment. This includes unwelcome sexual advances, inappropriate comments or jokes, gestures, or any behaviour that creates an intimidating, hostile, or offensive environment.

We encourage all employees to report sexual harassment or sexual violence, knowing that their concerns will be taken seriously and addressed promptly and fairly.

This policy is non-contractual and may be amended from time to time.

Scope

The Sexual Harassment Policy applies to all employees, governors, volunteers, agency and casual workers, contractors (including those self-employed), visitors, parents and any other third parties who work with us or provide services to us, or with whom our staff may come into contact with during the course of their work.

This policy applies to conduct that occurs both within the workplace and in any professional or work-related setting, including school visits, events, work-related social functions (including those which are not directly organised by work), and online interactions such as social media and networking platforms.

If a complaint primarily relates to another policy, such as grievance or whistleblowing, it will be handled according to the relevant policy.

Roles and responsibilities

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.

The leader of the setting has responsibility for ensuring all appropriate policies, systems and training are in place and that policies are reviewed on a regular basis.

HR and/or the People Team will provide support and guidance to those using this policy.

All managers have a specific responsibility to operate within the boundaries of this policy, ensure that all employees and workers understand the standards of behaviour expected of them and to take action when behaviour falls below its requirements.

This policy should form part of every new employee's induction.

Every staff member has a responsibility to treat others with dignity and respect and maintain an environment free from sexual harassment.

Available support

We understand that anyone affected by or involved in a complaint of sexual harassment may feel anxious or upset and we will do what we can to support you.

All employees have access to the 24/7 confidential Employee Assistance Programme. This can be accessed by calling 0800 030 5182 or through the website <https://wisdom.healthassured.org/login> with the organisation code: MHA145999.

We will provide access to support from a manager or HR professional for any alleged victims of sexual harassment. We will provide equal support to any alleged perpetrator until the conclusion of the process.

Sexual harassment

The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

It can be sexual harassment if the behaviour:

- has one of these effects even if it was not intended
- is intended to have one of these effects even if it did not have that effect

Examples of sexual harassment

Sexual harassment can occur in many forms, and can take place either at work, outside work, in person, or online. While this is not an exhaustive list, examples include:

- physical conduct of a sexual nature;
- unwelcome physical contact or intimidation;
- unwelcome touching, hugging, massaging or kissing;
- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;
- showing or sending offensive or pornographic material by any means (eg by text, video clip, posters, pictures, email or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;

- sexual comments or jokes;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures;
- making promises in return for sexual favours;
- sexual gestures;
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours; and
- discussing sexual experiences or intrusive questions about someone else's sexual experiences.

A person can experience unwanted conduct from the same or a different sex.

Sexual violence

Sexual violence is any kind of sexual activity or act which occurs without consent or involves one or more of the following:

- pressure
- manipulation
- bullying
- intimidation
- threats
- deception
- force

Examples of sexual violence

Some examples of sexual violence are listed below. This list is not exhaustive:

- rape
- sexual assault
- sexual abuse
- indecent exposure or "flashing"
- sexual exploitation

Third-party sexual harassment

Third-party sexual harassment occurs when an employee or worker is subjected to sexual harassment by someone who is not part of our workforce but who they may encounter in connection with work. This includes agency staff, supply teachers, suppliers, parents, visitors, members of the public etc.

Third-party sexual harassment of our workforce is unlawful and will not be tolerated. We are committed to taking steps to prevent sexual harassment of our staff by third parties.

If you have been subjected to third-party sexual harassment, you are encouraged to report this as soon as possible.

Harassment of third parties

We will not tolerate sexual harassment by any member of staff against a third party. Any allegations of sexual harassment will be fully investigated. Instances of sexual harassment of this kind may lead to disciplinary action, up to and including termination of employment.

What you should do if you witness or experience sexual harassment or sexual violence

If you experience or witness sexual harassment or sexual violence, here is what you should do:

1. Prioritise Your Safety

If you feel unsafe, remove yourself from the situation immediately. Seek assistance from a trusted colleague if necessary.

2. Report the Incident

Informally

If you feel able to, you may decide to raise the issue with the individual themselves, to make clear that their behaviour is not welcome and to ask them to stop. They may not be aware that their behaviour is offending you.

Alternatively, if you do not feel you can speak directly to the individual, you may consider asking your manager, a colleague, SLT or HR for support.

If you are experiencing sexual harassment by a third party, we encourage you to report this to SLT or the HR team without delay so that they can advise and support you on the best course of action.

Formally

If you are not happy with the outcome of an informal process, or if you feel it is not appropriate to approach the issue informally, you may decide to raise the matter formally.

To do this you should first discuss with the Principal or HR. If for any reason you are unable to approach the Principal, you can speak to the HR department or a member of the People Team.

You may raise a formal complaint of sexual harassment under our Grievance Policy if it applies to you. However, you may prefer to do so under this policy because it is specifically aimed at dealing with such issues.

If you raise a formal complaint under this policy, you will not be required to attend a grievance hearing and the investigation will be conducted under the disciplinary policy. You should be aware that you cannot raise a complaint under this policy if you have raised a complaint about the same issue already under the Grievance Policy.

Raising a formal complaint under this policy and anonymous reporting

To make a report of sexual harassment or sexual violence you can report to either Dukes Education or Hampstead Fine Arts College using the reporting forms below:

Hampstead Fine Arts College: [Sexual Harassment/Sexual Violence reporting form Hampstead Fine Arts College](#)

Dukes Education: [Sexual Harassment / Sexual Violence reporting form](#).

You may use either of these forms if you have been a victim of sexual harassment or sexual violence, or if you believe you have witnessed it. The form will allow you to make an anonymous report.

Please note that whilst we commit to investigating fully all reports we receive, we are only able to investigate based on the information which is provided, and therefore we encourage you to provide as much detail as possible.

The Sexual Harassment / Sexual Violence report will be sent directly to your People Partner or regional HR representative if you completed the Dukes Education form, or the Principal and HR team if you completed the Hampstead Fine Arts form.

If you choose to provide your name, we will speak to you first before any further investigation. We will make your Principal aware that we are investigating a concern unless you object to this and, in collaboration with the Principal we will appoint an investigating manager. We will inform you of the outcome of the investigation if you have provided your details.

If you are comfortable raising a formal complaint in person then you can write to the Principal, your local HR representative or your People Partner as an alternative to using the form. The person to whom you raise the complaint will make the Principal aware unless you have objections to this, and, in collaboration with the Principal, will appoint an investigating manager.

If the complaint is about the Principal or you do not wish to make the Principal aware, you should explain this when you raise your concern.

What information we will need

We will ask you to set out the details of the incident and include as much detail as possible about the incident including dates, times, locations, individuals involved and witnesses.

If you have provided your details, the investigating manager may wish to hold an investigation meeting with you. We will also hold an investigation meeting with the alleged perpetrator and any witnesses, based on the details you have provided. We may request CCTV and other evidence as part of the investigation.

We will investigate fully every formal complaint in an objective and confidential way, while also ensuring that we respect your rights as well as the rights of the alleged harasser.

Confidentiality

All reports will be handled confidentially to the extent this is possible, whilst ensuring a thorough investigation.

All employees must treat as confidential any information communicated to them in connection with a matter which is subject to this policy. Any breach of confidence may be dealt with under the disciplinary procedure.

The employee and anyone accompanying the employee to any meeting in set out in this policy, including both formal and informal meetings, must not make electronic recordings of any meetings or hearings conducted under this procedure without consent.

Protection for those involved

Retaliation or victimisation against anyone who reports harassment or participates in an investigation is strictly prohibited and will result in disciplinary action.

If you believe you have suffered any such treatment you should inform the Principal or a HR representative.

Please be assured that we will take your concerns seriously and will investigate any alleged occurrences of retaliation or victimisation.

Criminality

Where it appears that a crime may have occurred you will be encouraged to speak to the police.

As your employer we have a duty of care to you and your colleagues and, therefore, if we feel there is an ongoing risk to you or your colleagues and we have evidence of criminality, we may choose to report the incident to the police for your protection or the protection of other staff members.

Risk Assessments

We will carry out risk assessments to limit, as far as reasonably possible, any exposure to unnecessary risk of sexual harassment. You can find links to the risk assessments on BOB. These risk assessments are tailored specifically to your setting.

If you are not an employee and do not receive a copy of the staff handbook, you may request these risk assessments from your HR representative or a member of the People Team.

Contractors and suppliers

Contractors and suppliers will be made aware of this policy and our zero-tolerance approach to sexual harassment.

Visitors, guests and members of the public

In order to prevent third-party sexual harassment from occurring, we will make all visitors to our setting aware of our zero-tolerance approach to sexual harassment through clear signage in our reception area and any other appropriate areas which may be frequented by visitors.

Consequences of breaching this policy

If, following a formal investigation, we find that you have committed, authorised or condoned an act of sexual harassment or sexual violence, we may deal with the issue as a possible case of gross misconduct.

We may take disciplinary action against you, up to and including dismissal (or other appropriate action for non-employees).

You should be aware that any aggravating factors, such as abuse of power over a more junior colleague, will be taken into account in deciding what disciplinary action to take.

Anyone who complains or takes part in good faith in a sexual harassment investigation must not suffer any form of detrimental treatment or victimisation. If we find that you have victimised anyone in this way, we will instigate disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).

If you are an employee, please refer to our Disciplinary Policy for further information.

Should a third party sexually harass a member of staff we will take action that may include warning the third party (or their employer) about their behaviour, terminating their contract with us, and banning the third party from working with us and other schools within our organisation at any time in the future. Any criminal acts by third parties will be reported to the police.

Record-keeping

We process personal data collected in relation to sexual harassment complaints in accordance with our data protection policy. In particular, data collected in relation to the investigation of sexual harassment complaints is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints and conducting an investigation.

Time off because of sexual harassment

The organisation will handle any time off which results from sexual harassment at work sensitively. For instance, paid time off will be granted for sickness absence or appointments for specialist support that result from sexual harassment at work. Employees will not suffer any detriment as a result of time off due to sexual harassment. Should you be unable to return to work for an extended period, our long-term sickness absence procedure will be followed.

Monitoring

This policy will be reviewed every three years or as necessary in the interim.