

2026 - 2028

Our Community Multi Academy Trust
CEO – David Whitehead



Preventing Sexual Harassment Policy

Approved by	Board of Directors
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Associated Documentation
OCMAT Wellbeing Policy
OCMAT Grievance Policy
OCMAT Disciplinary Policy
OCMAT Data Protection Policy
OCMAT Whistleblowing Policy

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Part A – Policy

1. Policy Statement

- 1.1. Our Community Multi Academy Trust is committed to providing a safe work environment free from sexual harassment where everyone is treated with dignity and respect. Sexual harassment is unlawful and we will not tolerate it.
- 1.2. The Trust will take active steps to help prevent our staff from being sexually harassed in the workplace or from being victimised if they have made a complaint or have supported someone else who has made a complaint.
- 1.3. We encourage anyone who is a victim of, or witness to, sexual harassment to report it in accordance with this policy. This will enable us to take appropriate action and provide support.
- 1.4. Sexual harassment can result in legal liability for both Our Community Multi Academy Trust and the perpetrator.
- 1.5. Any member of our staff who sexually harasses another person will be disciplined and, where appropriate, may be dismissed.
- 1.6. This policy aims to:
 - explain what sexual harassment is
 - set out the standards of behaviour we expect you to follow
 - set out the process you should follow if you wish to raise a complaint
 - explain how we will deal with any complaints and
 - explain the preventative measures we will take to reduce the risk of sexual harassment happening in our workplace.

2. Scope of the Policy

- 2.1. This Policy applies to everyone who work at Our Community Multi Academy Trust, including employees, workers, agency workers, consultants, casual workers, volunteers and students. It does not form part of your contract with us, and we reserve the right to amend it.
- 2.2. Other relevant policies to be read in conjunction with this policy:

3. Adoption Arrangements and Dates

- 3.1. This policy was adopted by the Board of Directors of Our Community Multi Academy Trust on 28 September 2026. This policy supersedes any previous Sexual Harassment Policy. This policy will be reviewed by the Board of Directors every two years or earlier if there is a need. This will involve consultation with the recognised unions for material changes only.

4. The Definition of ‘Sexual Harassment’?

- 4.1. 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. Unwanted means unwelcome or uninvited. It reflects the employee’s

view and means unwanted by them.

4.2. It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature in the past.

4.3. Some examples of sexual harassment include but are not limited to:

- unwanted physical conduct including touching
- continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome
- unwelcome sexual advances or suggestive behaviour
- sending or displaying material that is sexual (including emails, text messages, video clips and images sent by mobile phone or posted on the internet)
- banter of a sexual nature.

4.4. A single incident can amount to sexual harassment.

5. Third Party Harassment

5.1. Third party sexual harassment occurs where an employee is subjected to unwanted conduct of a sexual nature by an individual who is not employed by the Trust and over whom the Trust does not have direct control, but with whom the employee comes into contact in the course of their work. This may include, for example, harassment by contractors, suppliers, visitors, parents, or members of the public.

5.2. The Trust is committed to taking all reasonable steps to prevent sexual harassment by third parties. We will not tolerate third party harassment, whether directed at our staff or by our staff towards third parties.

5.3. Steps we may take to prevent and address third party harassment include:

- providing training to employees and managers on recognising, preventing and responding to third party sexual harassment.
- Clearly communicating our expectations of respectful behaviours to contractors, visitors and other third parties (for example, through signage, correspondence and contractual terms where appropriate).
- ensuring our employees know how to report incidents involving third parties and encouraging prompt reporting.
- taking all complaints seriously and investigating concerns promptly and appropriately, including involving external agencies such as the police where necessary..
- taking appropriate actions where third-party harassment occurs, which may include; issuing warnings, , requiring individuals o leave the premises, ending or restricting services, terminating contracts or business relationships where appropriate and reporting serious incidents to the police.

5.4. All staff are encouraged to report any incidents of sexual harassment they experience or witness in accordance with this policy, including third party harassment, and to speak to their manager or any other appropriate person within the Trust if they think there are additional steps we could take to protect them from sexual harassment.

6. Our Commitment to Preventing Sexual Harassment

6.1. We will take the following reasonable steps to prevent sexual harassment in our workplace:

- conduct annual risk assessment to identify where our staff may be exposed to sexual harassment by other members of staff or by third parties;

- implement training programmes for all employees to ensure they recognise behaviours that may amount to sexual harassment, understand expected standards of behaviour and know how to raise concerns.
- make sure this policy is available to all members of staff;
- encourage staff to report incidents and ensure that all concerns are managed promptly and appropriately in line with this policy

Part B - Procedure

7. Raising a complaint or issues in relation to sexual harassment and/or victimisation

7.1. We encourage staff who witness sexual harassment or victimisation to take appropriate steps to address it. Depending on the circumstances, this could include:

- intervening where you feel able to do so;
- supporting the victim to report it or reporting it on their behalf;
- reporting the incident where you feel there may be a continuing risk if you do not report it;
- co-operating in any investigation into the incident.

7.2. You can also report the matter anonymously via the Trusts' Whistleblowing Policy or by speaking to your manager for advice.

7.3. If you believe that you have been sexually harassed you have a number of options open to you:

- If you feel confident doing so, speak to the person who has harassed you, explain why their behaviour is unwanted and ask them to stop. Sometimes, people do not realise how their actions are impacting others and pointing this out can be enough to prevent repeat behaviour. Please speak to your manager if you'd like advice about how to approach the conversation;
- Make a complaint under our grievance procedure (you have the option of choosing an informal or formal approach). Sometimes an informal solution may not be appropriate or hasn't worked. Where appropriate, we will talk to you about making a formal complaint;

7.4. If you are not certain whether an incident or series of incidents amounts to sexual harassment, please speak to your Manager or contact Trust HR and ask for advice.

7.5. If your concerns relate to your manager, contact Trust HR or another senior leader.

7.6. We want to reassure you that you will not be subjected to any detriment for making a complaint in good faith – even if the complaint is not upheld. No action will be taken against an individual where a complaint is found to be unsubstantiated, provided it was made honestly and without malice. However, if it is reasonably concluded that an allegation has been made falsely and in bad faith (i.e. the individual did not genuinely believe it to be true), this may be treated as a disciplinary matter. Such action would only be considered in exceptional circumstances.

8. Dealing with complaints

8.1. We will only deal with complaints in line with our Grievance Policy.

8.2. If the Trust deems it necessary, you may be separated from the person you are complaining about whilst we investigate to prevent the issues from escalating further whilst the investigation is ongoing. This is not a prejudgement of your complaint, and we will discuss this with you before taking this course of action.

- 8.3.** If your complaint is upheld, the matter will be dealt with in accordance with our Disciplinary and Conduct Policy.
- 8.4.** If your complaint is not upheld, we will explain why and explain how you can appeal this outcome in accordance with our Grievance Policy. If your complaint relates to a colleague, we will consider ways of improving your relationship and may, for example, suggest mediation or offer training.

9. Disciplinary action

- 9.1.** Any employee found to have sexually harassed a colleague, or another person will be subject to disciplinary action and may be dismissed. We will take into consideration any aggravating factors such as abuse of power over a more junior or vulnerable colleague, when deciding on the appropriate disciplinary action. We may also report any criminal acts to the police.
- 9.2.** If a member of staff has been harassed by a third party, we will take appropriate action to prevent it from reoccurring. That may include;
- warning the harasser that if they repeat their behaviour we may ban them from our premises and report any criminal acts to the police as appropriate.
 - banning the harasser from the premises instantly depending on the severity of the harassment

10. Protection and Support

- 10.1.** Anyone who raises an allegation of sexual harassment with us in good faith will not be subjected to any detriment as a result.
- 10.2.** We will provide appropriate support to anyone who makes a complaint or who witnesses an incident and will protect them from victimisation. You should not fear retaliation for having raised or supported a complaint of harassment and you will be protected from being treated less favourably because you have done so.
- 10.3.** We offer access to confidential counselling, which is available on request for anyone affected by, or accused of, sexual harassment. This is available to request via your line manager or confidentially through Trust HR.
- 10.4.** We will provide regular training to all employees on what sexual harassment is and how to report it. We will provide separate training to managers so they understand the role they have in supporting colleagues who experience or witness sexual harassment.
- 10.5.** We will undertake risk assessments and take other reasonable measures to understand areas and roles which are most at risk of sexual harassment and will take reasonable preventative steps to mitigate those risks.

11. Maintaining confidentiality

- 11.1.** We are committed to handling all complaints of sexual harassment sensitively and confidentially.
- 11.2.** If you have made a complaint, witnessed an incident or are accused of sexual harassment, you must not discuss the case with anyone except:
- any manager or other responsible person in our organisation you have approached for help and support;
 - your trade union representative;
 - someone at work who is acting as your companion at a formal meeting;

- close family or friends who are supporting you;
- anyone who is providing counselling or other services to you provided they are suitably qualified.

11.3. We will ensure that any investigation into a complaint is conducted confidentially and that the details of the complaint are only disclosed to those who need to know in order to investigate and resolve the matter. In some cases, this may include providing information to the police or to a regulator.

11.4. We may place information and documents about a complaint raised by or about you on your personnel file. These will be processed in accordance with our Data Protection Policy.

11.5. We will only use Non-Disclosure Agreements (NDAs) or confidentiality provisions if it is lawful, necessary, and appropriate to do so, and will not prevent employees from making protected disclosures (whistleblowing) as defined under the Employment Rights Act 1996. Please refer to the Trust's Whistleblowing Policy for more details.

11.6. If you fail to maintain confidentiality when you are involved in some way in a sexual harassment complaint, then you may face action under the Trust's Disciplinary Policy.

12. Monitoring our progress

12.1. We will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation we receive to make sure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and workforce training is targeted where needed.

12.2. We will review the effectiveness and contents of this policy at least on an annual basis. We will identify any themes that emerge, evaluate feedback and consider what lessons can be learned.

13. Useful Links

13.1. The following internal policies contain additional guidance/support:

- OCMAT Wellbeing Policy
- OCMAT Grievance Policy
- OCMAT Disciplinary Policy
- OCMAT Data Protection Policy
- OCMAT Whistleblowing Policy