Policy Name	Sexual Harassment Policy				
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Author	Head of School				

Version History				
Version	**Approved by**	**Revision Date**	**Details of Changes**	**Author**
1.2	**Head**	**September 2025**	**Reviewed September 2025.**	**AQ**

At ICS London, we are dedicated to fostering a safe, inclusive, and respectful workplace where everyone is treated with dignity and respect, free from harassment.

Sexual harassment, in any form, is unlawful and will not be tolerated under any circumstances. This policy applies to all employees, workers, and contractors.

We are committed to taking active measures to prevent sexual harassment in the workplace, and to protect individuals from victimisation if they report an incident or support someone else in doing so. Harassment, in any form, is a disciplinary offence and, in serious cases, may lead to summary dismissal.

This includes:

- When an employee is working from home
- Social events connected to work
- Online platforms, including social media
- Situations outside of work that could negatively impact our reputation or relate to an individual's suitability to perform their role

Definition of Sexual Harassment

Sexual harassment is defined as unwanted physical, verbal, or non-verbal conduct of a sexual. The Equality Act 2010 and the Worker Protection Act 2023 protects the following individuals from sexual harassment:

- Employees and workers
- Contractors and self-employed individuals hired to perform work
- Job applicants
- Agency Workers and Volunteers

For conduct to be considered sexual harassment, it must:

- Violate someone's dignity, or
- Create an intimidating, hostile, degrading, humiliating, or offensive environment
- Also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature in the past.

It can still be sexual harassment if:

- has one of the above effects even if it was unintended
- The behaviour occurred even if the person did not intend to harass

Sexual harassment can take many forms and may occur either as isolated incidents or as part of a pattern of behavior. It can happen in person, online, or through messaging platforms. Examples include, but are not limited to:

- Sexual comments or jokes about someone's appearance or body
- Inappropriate questions about someone's sex life or sexual orientation
- Unwanted physical contact, such as hugging or touching
- Sharing or displaying sexually explicit images
- Sexual assault or rape
- Sharing pornographic or sexual content
- Making sexual comments about someone's sexual orientation or gender reassignment

Third-Party Sexual Harassment

Third-party harassment occurs when an individual is sexually harassed by someone not employed by us but whom they encounter through their work, such as visitors, contractors, parents/caregivers, or pupils. This may include:

- Unwelcome sexual advances from a customer or client
- Inappropriate comments or behaviour from third parties

We will take proactive measures to prevent sexual harassment which includes taking all complaints seriously and handling them with fairness and sensitivity. All complaints will be treated confidently.Complaints may comes from:

1) The person experiencing harassment
2) A Witness to the harassment
3) Third party reporting the behaviour

The Steps we take to Prevent Sexual Harassment

At ICS London, we are committed to creating a culture of respect and safety by actively implementing the following measures to prevent sexual harassment:

1) Conducting risk assessments to identify potential exposure to harassment. Our risk assessment is shared with employees and can be found here. This risk assessment will be reviewed on a regular basis.

2) Implementing training for all employees on recognising sexual harassment.

3) Providing additional training for managers to support colleagues who experience or witness harassment.

4)Encouraging staff to report incidents, with an anonymous reporting procedure in place.

5) EAP- All Staff are able to use the Employee Assistance Programme through Education Support for Practical and emotional support. The contact details are 08000 856 148.

How to Report Sexual Harassment

We encourage staff who witness sexual harassment or victimisation to take the following actions:

1) Intervene if they feel able to do so
2) Support the victim in reporting the incident or report it on their behalf
3) Cooperate with any investigation

If you feel you have been sexually harassed, you may:

1) If you feel confident in doing so, speak to the person who has harassed you.explain why their behaviour is unwanted and ask them to stop.Sometime people do not realise their actions are impacting others until you point it out, this can be enough to prevent repeated behaviour. You will be able to speak to the Head of School to discuss how you can approach this conversation.
2) Make a complaint under the Grievance procedure, this can be informal or formal. The Grievance policy can be found on Page 29 of the Staff Handbook.
3) Make an anonymous report using this form here.

There may be times where staff are unsure if an incident or series of incidents amount to sexual harassment, if you are in any doubt please speak to the Head of School who will be able to provide advice.

If your complaint is related to the Head of School, reports should be made to the Board of Directors. The name of the Safeguarding Lead on the Board is Daniel Jones who can be reached by emailing daniel.jones@globeducate.com.

Assurance and Support

We want to assure staff that they will not face any detrimental impact for making a complaint, even if it is not upheld. Disciplinary action will only be taken if a complaint is proven to be false and vexatious.

Handling Complaints

Upon receiving a complaint, complaints will be addressed under our Grievance Policy which can be found on page 29 of the Staff Handbook. To protect those

involved during an investigation or complaint of sexual harassment, we will take immediate steps to safeguard all parties.

Employees found to have engaged in sexual harassment will face disciplinary action, which may include:

- Final written warnings
- Relocation or reassignment of duties
- Dismissal in serious cases

If the school decides not to uphold your complaint, we will explain why and explain how you can appeal 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 a restorative mediation or offer training.

If harassment involves a third party, appropriate steps will be taken to prevent recurrence, including warning or banning the individual from the premises.

If the harassment constitutes a criminal offense, such as sexual assault, the individual will be supported in reporting the incident to the police.

Safeguarding

If an allegation of sexual harassment involves safeguarding concerns, particularly where the behavior may pose a risk of harm to children or vulnerable adults, the matter will be referred to the LADO (Local Authority Designated Officer).

Protection from Retaliation

Anyone raising concerns in good faith will not be subject to retaliation. We will protect all individuals from victimisation and ensure they are not treated less favourably for making a complaint or supporting one.

Employee Assistance Programme

All Staff are able to use the Employee Assistance Programme through Education Support for Practical and emotional support.

The contact details are 08000 856 148.

Confidentiality

We are committed to maintaining confidentiality throughout the complaint process. Information will only be shared with those necessary for investigating and resolving the issue. 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. 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.