Agency Workers' Sexual Harassment Policy

Company name:	Vision for Education / Smart Teachers
Document	Agency Workers' Sexual Harassment Policy
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Our Policy

Vision for Education and Smart Teachers are committed to ensuring that all of their supply staff are treated with dignity and respect in their place of work, and that they treat others in the same way. We believe that all supply staff have the right to work in an environment which is free from any form of harassment, including sexual harassment.

Vision for Education and Smart Teachers have a zero-tolerance approach to sexual harassment.

We are committed to taking all reasonable steps to prevent sexual harassment of all employees, supply staff, and applicants before it occurs. We adopt a proactive approach to identifying and reducing risks, promoting a respectful working environment, encouraging reporting, and responding promptly to concerns. In preparation for the strengthened duty expected to take effect in October 2026 under the Employment Rights Act 2025, we are reviewing our arrangements to ensure that all reasonable steps are taken to prevent sexual harassment. This policy will be reviewed at least annually to ensure compliance with relevant obligations and best practice.

Preventing Sexual Harassment

Vision for Education and Smart Teachers will take proactive measures to prevent sexual harassment, including:

- assessing workplace risks where agency workers may be exposed to sexual harassment;
- providing appropriate training and guidance;
- ensuring workers know how to report concerns;
- responding promptly to reports and reviewing outcomes to identify recurring risks;
- working with client schools and settings to address identified risks where reasonably practicable.

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Harassment

Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual, including conduct of a sexual nature.

Sexual harassment also includes treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may be committed by colleagues, agency staff, school employees, pupils where applicable, parents, contractors, visitors or any other third party encountered during an assignment. It does not need to occur in person. It can occur via digital means, including social media sites or channels (e.g. WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour.

Where concerns relate to third parties, we will work with the client school or setting to take appropriate steps to reduce the risk of recurrence, including reviewing whether further placements remain appropriate.

Victimisation

Victimisation occurs when an individual is subjected to a detriment because they have carried out, or are believed to have carried out, a protected act. Protected acts include:

- bringing proceedings under the Equality Act 2010;
- giving evidence or information in connection with such proceedings;
- doing anything else in connection with the Equality Act 2010; or
- making an allegation that another person has breached the Equality Act 2010.

This includes raising or supporting a complaint of discrimination, harassment or sexual harassment and participating in an investigation or related process.

Victimisation will not be tolerated. No employee, agency worker or applicant will be disadvantaged for carrying out, or being believed to have carried out, a protected act.

A concern that is not upheld will not, by itself, result in action against the person who raised it. However, this protection does not extend to false evidence or allegations made in bad faith.

Sexual Harassment

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, Vision for Education and Smart Teachers are committed to providing a work environment free from unlawful sexual harassment.

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1.1 Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or the effect of:

1.1.1 violating an individual's dignity; or

1.1.2 creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.

1.2 An individual of any gender may be the victim of sexual harassment.

1.3 Whilst not an exhaustive list, forms of sexual harassment can include:

1.3.1 Sexual comments or jokes, which may be referred to as 'banter';

1.3.2 Displaying sexually graphic pictures, posters or photos;

1.3.3 Suggestive looks, staring or leering;

1.3.4 Propositions and sexual advances;

1.3.5 Making promises in return for sexual favours;

1.3.6 Sexual gestures;

1.3.7 Intrusive questions about a person's private or sex life or a person discussing their own sex life;

1.3.8 Sexual posts or contact in online communications, including on social media;

1.3.9 Spreading sexual rumours about a person;

1.3.10 Sending sexually explicit emails, text messages or messages via other social media

1.3.11 Unwelcome touching, hugging, massaging, or kissing.

Examples are illustrative and may occur in person, digitally, on social media, at work events or during travel connected with an assignment.

Intention is not decisive: conduct can be harassment because of its effect, taking account of the individual's perception, the circumstances and whether it was reasonable for the conduct to have that effect.

1.4 If an individual believes that they have been sexually harassed, they should make an immediate report or report as soon as possible after the incident. The details of the report should include:

1.4.1 Details of the incident

1.4.2 Name(s) of the individual(s) involved.

1.4.3 Name(s) of any witness(es)

Concerns can be reported to the Safeguarding Team at dsl@edwin.supply, the worker's consultant or another appropriate manager. Absolute confidentiality cannot be guaranteed. A worker does not have to report a concern to someone involved in it. Where a concern relates to an immediate danger or possible criminal offence, the worker should contact the police as appropriate.

1.5 We will ensure that concerns are considered promptly and appropriately, working with the client school or setting and any relevant third parties. The Agency will determine what action it is responsible for taking and will keep the reporting worker appropriately informed. If it is concluded that harassment has occurred, remedial action will be taken.

1.6 Sexual harassment may result in action under the applicable disciplinary, incidents or allegations procedure, up to and including termination of employment, engagement or assignment.

1.7 Where an incident/complaint of sexual harassment relates to a member of supply staff, the Agency will not carry out instructions from the school or setting which it considers will amount to sexual harassment and victimisation.

1.8 The Agency will take all reasonable steps to safeguard agency workers and internal members of staff from sexual harassment.

1.9 The Agency assumes that any school/setting has a sexual harassment policy in place, and that this can be made available on request.

1.10 The Agency will provide appropriate sexual harassment awareness training to relevant internal staff and agency workers, with refresher training as required.

2 All employees and workers will be expected to comply with our policies on sexual harassment in the workplace. Any breach of such a policy will lead to appropriate disciplinary action.

3 All agency workers are expected to:

- treat others with dignity and respect;
- not engage in unwanted conduct of a sexual nature;
- report incidents they experience or witness;
- cooperate with investigations.

4 Supply staff who the Agency finds to be responsible for sexual harassment will be subject to our incidents and allegations procedure, even where such sexual harassment involves individuals who are not engaged by the Agency.

5 The Agency will periodically review reports, trends and lessons learned relating to sexual harassment to identify whether further preventative measures are required.