

## **ECS - English Country Schools - Harassment Policy**

### **Introduction**

ECS is dedicated to creating a work and learning environment that is inclusive, respectful, and free from harassment of any kind. This policy outlines our expectations for behaviour and the process for reporting and addressing concerns. Key points of this policy are reviewed during staff inductions to ensure everyone understands and follows these principles. If you have any questions or need clarification, please ask.

### **Definition of Harassment**

According to the Equality Act 2010, harassment occurs when someone engages in unwanted behaviour that violates another person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. This includes actions related to a protected characteristic that have the same effect.

Protected characteristics under the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

### **Sexual Harassment**

Sexual harassment is a specific form of harassment involving unwanted behaviour of a sexual nature. It can be verbal, non-verbal, or physical and is often worsened by power imbalances in the workplace.

Examples of sexual harassment include:

- Unwelcome sexual advances or requests for sexual favours.
- Inappropriate jokes, comments, or remarks about someone's sexuality.
- Physical contact without consent, such as touching or groping.

- Questioning or commenting on someone's sexual orientation.
- Conduct of a sexual nature that interferes with work performance or creates a hostile environment.
- Romantic or consensual relationships between senior and junior staff, which may still constitute harassment due to power imbalances.

### **ECS takes proactive measures to prevent sexual harassment:**

- Conducting regular sexual harassment risk assessments.
- Maintaining an updated harassment prevention policy.
- Providing safeguarding and harassment prevention training before and during courses.
- Encouraging reporting through clear channels.

### **Reporting and Addressing Incidents:**

- Staff or students who experience sexual harassment should report incidents to the Course Manager.
- Even if formal action is not pursued, reporting ensures that records are kept and preventive measures can be reinforced.
- Any reported case will be managed according to the grievance policy outlined in employment contracts.

ECS is committed to maintaining a safe and respectful workplace where all reports of sexual harassment are taken seriously and handled appropriately.

### **General Harassment**

General harassment includes behaviours that humiliate, intimidate, or undermine individuals, creating a hostile environment.

Examples of general harassment include:

- Bullying, such as deliberate intimidation or exclusion.
- Discrimination based on protected characteristics or other factors.
- Spreading malicious rumours to damage someone's reputation.
- Making offensive or inappropriate comments.
- Denying fair access to training or promotion opportunities without justification.
- Deliberately overloading a competent worker with excessive tasks.

- Undermining an individual's contributions or achievements.

**ECS will not tolerate such behaviour and expects:**

- All staff to uphold these standards.
- A positive workplace culture.
- Swift action to prevent or address harassment incidents.

**Reporting and Support**

- ECS encourages open communication and reporting of harassment concerns.
- Staff should report issues to the Course Manager.
- Students can approach any staff member they trust, who will liaise with the Designated Safeguarding Lead (DSL) for appropriate action.
- Reports will be handled sensitively, respecting privacy and preferences.
- Reports will be recorded in writing by ECS.
- ECS will investigate concerns responsibly, keeping individuals informed while maintaining confidentiality where required.
- ECS guarantees statutory protection for employees who raise concerns in the right way, regardless of whether the allegations are proven.
- This policy applies to all employees, contractors, agency workers, and remote workers.

**Commitment to Action**

ECS is committed to addressing all reports of harassment or sexual harassment fairly and ensuring a supportive process. Confidentiality and protection from retaliation are guaranteed for those reporting concerns in good faith. Even if victims choose not to take formal action, reports will still be recorded and evaluated to maintain a safe environment.

**Whistleblowing**

Whistleblowing refers to reporting wrongdoing within an organisation. Concerns can be raised about past, present, or future incidents. Confidentiality agreements cannot be used to silence whistleblowers, and employees should not fear making their concerns known.

**Difference between whistleblowing and grievances:**

- **Whistleblowing:** Reporting illegal, unethical, or dangerous activities that may affect clients, third parties, or the public.
- **Grievance/Complaint:** Usually related to personal employment issues without a broader public interest.

## **Your Responsibility**

Everyone must:

- Treat others with dignity and respect.
- Avoid bullying, harassment, or intimidation.
- Avoid victimising anyone who makes or supports a complaint.
- Report inappropriate behaviour to the Course Manager or Directors of ECS.

## **Responsibilities of Line Manager**

Line Managers must:

- Ensure staff are familiar with this policy.
- Take immediate action against bullying, harassment, or victimisation.
- Maintain professional standards and avoid using intimidation as a management style.
- Encourage staff to report discrimination against them or colleagues.

## **Regulatory Disclosures**

If you feel unable to report concerns internally and believe your information is accurate, you may escalate the matter to the Directors of ECS, Christopher and Sarah Etchells.

If internal or regulatory disclosure is not an option, wider disclosure (e.g., to the police or media) may be considered, but protections apply only in certain circumstances. ECS recommends seeking independent legal advice before taking this step.

## **Respecting Confidentiality**

External disclosures must respect supplier confidentiality unless:

- The law requires or permits disclosure.
- The supplier consents.

Only disclose relevant information to the appropriate staff. Avoid making accusations without following the correct procedures.

### **Consequences of Policy Breaches**

Employees who raise concerns in good faith will not face retaliation. However, making malicious false allegations may result in disciplinary action.

### **Monitoring and Review**

This policy is reviewed annually and updated in line with legal or procedural changes. Staff will receive training on any updates to maintain awareness and understanding.

ECS remains committed to fostering a workplace where harassment and sexual harassment have no place.

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