

Company Name:	Tradewind Recruitment / SANZA Teaching Agency
Model Policy Name:	Sexual Harassment Policy
Date:	1 December 2024 Reviewed 1 September 2025 Reviewed 1 September 2026

OUR POLICY

Tradewind Recruitment & Sanza Teaching Agency is committed to ensuring that all its staff and applicants are treated with dignity and respect and treat others in the same way. We believe that all staff and applicants have the right to work in an environment which is free from any form of harassment, including sexual harassment.

Tradewind Recruitment & Sanza Teaching Agency has a zero-tolerance approach to sexual harassment.

Tradewind Recruitment & Sanza Teaching Agency is committed to ensuring that reasonable steps are taken to prevent sexual harassment to all employees, workers, and applicants. This policy will be reviewed and updated from time to time to ensure Tradewind Recruitment & Sanza Teaching Agency's compliance with its duties under the Equality Act 2010 as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023 to ensure that all reasonable steps are taken to prevent sexual harassment.

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.



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Sexual Harassment

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, Tradewind Recruitment & Sanza Teaching Agency is committed to providing a work environment free from unlawful sexual harassment.

- 1.1 Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or the effect of:
 - 1.1.1 violating the victim'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 Slurs or unwanted sexual advances;
 - 1.3.2 Visual conduct such as derogatory or sexually oriented posters;
 - 1.3.3 Physical conduct such as assault, unwanted touching, or any interference because of sex, race, or any other protected characteristic basis;
 - 1.3.4 Threats and demands to submit sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours;
 - 1.3.5 Sexual comments or jokes;
 - 1.3.6 Unwelcome touching, hugging, massaging, or kissing.



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- 1.4 If an individual believes that they have been sexually harassed, they should make an immediate report to School DSL (Designated Safeguarding Lead) or Headteacher and Tradewind/Sanza Consultant followed by a written complaint as soon as possible after the incident. The details of the complaint 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)
- 1.5 Tradewind Recruitment & Sanza Teaching Agency will undertake a thorough investigation of the allegations. If it is concluded that harassment has occurred, remedial action will be taken.
- 1.6 Where an incident/complaint of sexual harassment relates to a temporary agency worker Tradewind Recruitment & Sanza Teaching Agency will not carry out instructions from a hirer/and/or intermediary which it considers will amount to sexual harassment and victimisation.
- 1.7 Tradewind Recruitment & Sanza Teaching Agency will take reasonable steps to safeguard temporary workers it supplies and internal members of staff from harassment.
- 1.8 Tradewind Recruitment & Sanza Teaching Agency will remind the hirer (schools) that they should have a sexual harassment policy in place, and that this is given to the candidates.
- 1.9 Tradewind Recruitment & Sanza Teaching Agency will provide access to training on sexual harassment through our training provider, the National College.
- 2 All employees and temporary workers will be expected to comply with Tradewind Recruitment & Sanza Teaching Agency's policy on sexual harassment in the workplace. Any breach of such a policy will lead to appropriate disciplinary action.

- 3 Temporary workers who Tradewind Recruitment & Sanza Teaching Agency finds to be responsible for sexual harassment will be subject to Tradewind Recruitment & Sanza Teaching Agency's complaints procedure and/or Incidents Policy even where such sexual harassment involves individuals who are not engaged by Tradewind Recruitment & Sanza Teaching Agency. If the concerns reported are considered substantiated, this could potentially be deemed as gross misconduct and could result in some form of disciplinary action up to and including removal from the live Tradewind Recruitment & Sanza Teaching Agency database, and DBS/TRA referral which will cease the terms of engagement between us.

Complaints and monitoring process

Tradewind Recruitment & Sanza Teaching Agency has procedures for monitoring compliance with this policy and for dealing with complaints of sexual harassment in place. These are available from HR and will be made available immediately upon request. Any discrimination complaint will be investigated fully.



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