



Sexual Harassment, Prevention and Action Policy (Alternative Provision)

Contents

<i>Version History</i>	2
<i>Executive Summary</i>	3
1. <i>Aims of the Policy</i>	4
2. <i>What is Sexual Harassment?</i>	4
3. <i>Unwanted Conduct</i>	5
4. <i>Examples of Sexual Harassment</i>	5
5. <i>When Does This Policy Apply?</i>	6
6. <i>Allegations Involving Third Parties</i>	6
7. <i>Prevention of Sexual Harassment (Enhanced Duty – 01 April 2026)</i>	6
8. <i>Safeguarding and Position of Trust</i>	7
9. <i>Responsibilities of Head of Provision and Senior Staff Members</i>	7
10.0 <i>Responsibilities of Staff and Learners</i>	7
11.0 <i>Reporting Mechanisms</i>	8
12.0 <i>Protection for Victimisation</i>	8
13.0 <i>Legal Disputes and Resolution</i>	8
14.0 <i>Review and Evaluation</i>	9
15.0 <i>Support for Those Affected</i>	9
16.0 <i>Use of Language</i>	9
17.0 <i>Further Information and Support</i>	9
<i>APPENDIX 1: Sexual Harassment Report Form (Staff and Learners)</i>	10
<i>APPENDIX 2: Learner- Friendly Guide: What to Do if Something Doesn't Feel Right</i>	12
<i>APPENDIX 3: Peer-on Peer Sexual Harassment and Harmful Sexual Behaviour Guidance</i>	13
<i>APPENDIX 4: Position of Trust and Staff-to-Learner Allegations Protocol</i>	14
<i>APPENDIX 5: Sexual Harassment Risk Assessment Template (April 2026 Duty)</i>	15
<i>APPENDIX 6: Sexual Harassment Risk Assessment Template (April 2026 Duty)</i>	17
.....	17
<i>APPENDIX 7: Support Pathway for Those Affected</i>	18

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 1 of 22
---	--------------------------------------	------------------------------------	--------------



APPENDIX 8: Training and Compliance Record (Prevention Duty Monitoring)..... 19
APPENDIX 9: Equality Impact Assessment 20

[Version History](#)

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 2 of 22
---	--------------------------------------	------------------------------------	----------------------------



Version No.	Author/Editor	Approved by	Date Issued	Next Review Date	Brief Summary of Changes
1	Lorraine Miranda	Rhea Marwaha	15.04.2026	14.04.2029	New Policy

Executive Summary

Nova Newcastle Ltd is committed to providing an inclusive, respectful and safe environment in which all staff, learners, volunteers, visitors and professionals are treated with dignity and where sexual harassment is not tolerated in any form.

This policy applies across Nova Newcastle Ltd's Alternative Provision setting and reflects the organisation's safeguarding responsibilities, its statutory duties under the Equality Act 2010, and the expectations of Ofsted that education providers actively promote a culture of safety, professionalism and respect.

Sexual harassment can occur in any setting, including educational environments, and may involve staff, learners, peers, visitors, contractors or third parties. It is recognised that learners in Alternative Provision may be particularly vulnerable due to trauma, unmet needs, exploitation risks, SEND, disrupted education histories or difficulties with boundaries. For this reason, all concerns connected to sexual harassment must be treated not only as workplace issues but, where relevant, as safeguarding matters.

Nova Newcastle Ltd will take all reasonable steps to prevent sexual harassment, respond robustly to incidents, provide appropriate support, and take action to address behaviour, risk and culture.

From **01 April 2026**, employers are under an enhanced legal duty to take proactive and reasonable steps to prevent sexual harassment before it occurs. Nova Newcastle Ltd fully embraces this duty and will ensure that prevention is embedded through training, safeguarding practice, risk assessment, leadership accountability and continuous review.

Sexual harassment will be treated as a serious disciplinary offence where staff are involved, and may also result in safeguarding referrals, including to the Designated Safeguarding Lead (DSL), the Local Authority Designated Officer (LADO), Children's Social Care and/or the Police where appropriate.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 3 of 22
---	-----------------------------------	---------------------------------	--------------



No individual will be victimised for raising a concern or supporting another person to do so. Nova Newcastle Ltd is committed to creating an environment where learners and staff feel confident that concerns will be listened to, taken seriously and acted upon appropriately.

1. Aims of the Policy

The purpose of this policy is to prevent sexual harassment, respond effectively when concerns arise, and create a long-term culture of respect and safety within Nova Newcastle Ltd.

Nova Newcastle Ltd aims to achieve this by ensuring that all staff and learners understand what sexual harassment is, how it may present in an Alternative Provision context, and what is expected of them in terms of behaviour, boundaries and reporting.

This policy also exists to ensure that incidents are managed consistently, fairly and lawfully, with safeguarding at the centre of decision-making. It is designed not only to address individual incidents but also to capture learning, strengthen practice and reduce future risk.

Nova Newcastle Ltd is committed to meeting its legal and moral duty to take proactive steps to prevent sexual harassment, in line with the strengthened statutory prevention duty effective from 01 April 2026.

The Head of Provision has overall responsibility for ensuring this policy is implemented effectively, supported by senior leadership and the safeguarding team.

2. What is Sexual Harassment?

Sexual harassment is prohibited under the Equality Act 2010. It occurs where a person is subjected to unwanted conduct of a sexual nature which has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment can be a single incident or a pattern of behaviour over time. It may occur between adults, between learners, or involve third parties. It may also occur online, through social media, messaging platforms or digital learning environments.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 4 of 22
---	--------------------------------------	------------------------------------	--------------



It is also unlawful to treat someone less favourably because they have rejected or submitted to unwanted sexual behaviour, or because they have raised a complaint.

Nova Newcastle Ltd recognises that sexual harassment is often linked to abuse of power, boundary violations, discrimination and vulnerability, and must always be treated as serious misconduct and, where relevant, a safeguarding concern.

3. Unwanted Conduct

Unwanted conduct refers to behaviour that is not welcome, not invited, and causes discomfort, distress or offence. The impact of the behaviour must be considered from the perspective of the person experiencing it.

Unwanted conduct may include physical contact, sexualised language, gestures, jokes, coercion, sexual pressure, sharing explicit material, or any behaviour that crosses professional or personal boundaries.

Nova Newcastle Ltd also recognises that in Alternative Provision settings, learners may sometimes demonstrate sexualised behaviour linked to trauma, exploitation, unmet needs or harmful sexual behaviour. Such incidents must be addressed through safeguarding procedures, education, support and appropriate behavioural interventions.

4. Examples of Sexual Harassment

Sexual harassment may include, but is not limited to, unwanted sexual comments, jokes, sexualised bullying, inappropriate touching, coercion, sharing explicit images, sexual threats, or online harassment.

In an Alternative Provision context, this may also include peer-on-peer sexual harassment, sexualised name-calling, unwanted physical contact between learners, sexual exploitation risks, or inappropriate adult-to-learner behaviour.

All concerns must be acted upon promptly, proportionately and in line with safeguarding thresholds.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 5 of 22
---	--------------------------------------	------------------------------------	--------------



5. When Does This Policy Apply?

This policy applies to any unwanted sexual conduct occurring in the course of Nova Newcastle Ltd's work or educational environment, including on-site, off-site activities, transport, work experience placements, online learning platforms, trips, events or any context connected to the organisation.

It applies equally to staff, learners, agency workers, contractors, volunteers, visitors and third parties.

6. Allegations Involving Third Parties

Sexual harassment by third parties, including visitors, professionals, parents/carers, contractors or members of the public, will not be tolerated.

Any concerns must be reported immediately and may result in safeguarding action, removal from site, termination of contracts or referral to external authorities.

7. Prevention of Sexual Harassment (Enhanced Duty – 01 April 2026)

Nova Newcastle Ltd is committed to preventing sexual harassment through proactive, structured and reasonable measures, in accordance with the strengthened legal duty effective from **01 April 2026**.

This duty requires organisations not only to respond to harassment but to take steps to stop it occurring in the first place.

Nova Newcastle Ltd will meet this duty by embedding prevention into safeguarding culture, including:

- mandatory staff training on professional boundaries and harassment
- learner education on respectful behaviour and consent
- risk assessments identifying harassment "hot spots"
- clear reporting routes for staff and learners
- visible leadership accountability
- robust disciplinary and safeguarding responses
- regular review of incidents, themes and learning

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 6 of 22
---	--------------------------------------	------------------------------------	--------------



Prevention is not a one-off exercise. It is a continuous safeguarding responsibility.

8. Safeguarding and Position of Trust

Where a concern involves a learner, safeguarding procedures will take priority.

Any allegation or concern involving sexual behaviour between staff and learners will always be treated as a serious breach of trust and may constitute gross misconduct, as well as a safeguarding referral.

Nova Newcastle Ltd will immediately involve the Designated Safeguarding Lead (DSL) and, where required, refer to the Local Authority Designated Officer (LADO), Children's Social Care and/or Police.

Staff must understand that they hold a position of trust and that any sexualised conduct towards learners is wholly unacceptable.

9. Responsibilities of Head of Provision and Senior Staff Members

Managers and supervisors are responsible for ensuring that this policy is implemented consistently and that staff and learners understand expected standards.

They must respond swiftly and sensitively to concerns, escalate safeguarding matters appropriately, challenge inappropriate behaviour, and ensure that no person is victimised for raising an issue.

Failure to act may itself constitute misconduct.

10.0 Responsibilities of Staff and Learners

All staff have a duty to uphold professional standards, maintain appropriate boundaries and contribute to a respectful culture.

Learners are expected, in line with their understanding and support needs, to engage respectfully with others and to report concerns.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 7 of 22
---	--------------------------------------	------------------------------------	--------------



Nova Newcastle Ltd recognises that learners may require education, therapeutic support and safeguarding intervention rather than punitive responses in some cases, particularly where behaviour reflects trauma or exploitation.

11.0 Reporting Mechanisms

Nova Newcastle Ltd encourages all staff and learners to report concerns at the earliest opportunity.

Concerns may be raised with a trusted adult, line manager, the Designated Safeguarding Lead, HR, or through safeguarding reporting systems.

Anonymous concerns will be taken seriously, although this may limit the ability to investigate fully.

Nova Newcastle Ltd reserves the right to investigate concerns even if a complaint is withdrawn, where risk remains.

12.0 Protection for Victimisation

No person will be treated unfairly, disadvantaged or victimised for raising a concern, supporting another individual, or participating in an investigation.

Retaliation is a disciplinary offence.

13.0 Legal Disputes and Resolution

Nova Newcastle Ltd will manage any legal disputes connected to sexual harassment fairly, sensitively and with awareness of potential trauma impacts.

Nova Newcastle Ltd remains open to mediation or alternative dispute resolution where appropriate, but safeguarding duties will always take precedence.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 8 of 22
---	--------------------------------------	------------------------------------	----------------------------



14.0 Review and Evaluation

This policy will be reviewed regularly to ensure effectiveness, compliance and alignment with safeguarding practice and statutory guidance.

Nova Newcastle Ltd will monitor trends, training completion, incident reporting and cultural progress, ensuring continuous improvement.

15.0 Support for Those Affected

Nova Newcastle Ltd recognises the emotional and psychological impact of sexual harassment and will provide access to appropriate support, including safeguarding support, counselling, occupational health referrals or external services.

Support will also be offered to witnesses and others affected.

16.0 Use of Language

Nova Newcastle Ltd will use sensitive, neutral and professional language when managing concerns, avoiding terminology that may stigmatise or retraumatise individuals.

17.0 Further Information and Support

Further guidance is available from ACAS, the Equality and Human Rights Commission, safeguarding agencies, specialist support services and emergency services where needed.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 9 of 22
---	--------------------------------------	------------------------------------	----------------------------



APPENDIX 1: Sexual Harassment Report Form (Staff and Learners)

Nova Newcastle Ltd encourages any staff member or learner to report concerns as early as possible. Reports may be made verbally in the first instance, but this form should be completed to support safeguarding and follow-up action.

1. Details of the person raising the concern

Name: _____
Role (Staff/Learner/Other): _____
Preferred contact method: _____
Date of report: _____

2. Details of the concern

Date(s) of incident(s): _____
Time(s): _____
Location (on-site/off-site/online): _____

Please describe what happened, using your own words:

3. Who was involved?

Name(s) of person(s) alleged to have caused harm:

Name(s) of any witnesses:

4. Immediate impact

How has this affected you or others?

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 10 of 22
---	-----------------------------------	---------------------------------	---------------



5. Desired outcome (if known)

What support or action would you like?

6. Safeguarding and escalation

Does this concern involve a learner under 18? YES / NO

Has the DSL been informed? YES / NO

Does the person feel safe right now? YES / NO

Signed: _____

Received by: _____

Date: _____

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 11 of 22
---	--------------------------------------	------------------------------------	---------------



APPENDIX 2: Learner- Friendly Guide: What to Do if Something Doesn't Feel Right

At Nova Newcastle Ltd, everyone has the right to feel safe and respected.

Sexual harassment is when someone says or does something sexual that makes another person feel uncomfortable, unsafe, embarrassed or upset.

This might include:

- sexual comments or jokes
- unwanted touching
- someone pressuring you to do something
- sexual messages or images online
- being made to feel unsafe because of your gender or body

If this happens:

You do not have to deal with it alone.

You can tell:

- any trusted adult in the setting
- your key worker or mentor
- the Designated Safeguarding Lead (DSL)
- a parent/carer or another safe adult

You will be listened to, taken seriously, and supported.

It will never be your fault.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 12 of 22
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 3: Peer-on Peer Sexual Harassment and Harmful Sexual Behaviour Guidance

Nova Newcastle Ltd recognises that sexual harassment may occur between learners, including peer-on-peer incidents.

In Alternative Provision, this may sometimes be linked to:

- trauma or abuse history
- exploitation risks
- unmet SEND needs
- poor boundaries
- exposure to inappropriate online content

All peer-on-peer sexual harassment will be treated as a safeguarding matter.

Responses will be proportionate and may include:

- immediate safety planning
- separation of learners
- safeguarding referrals
- behavioural support plans
- education on consent and respectful relationships
- referral to specialist services where needed

Sanctions may apply, but safeguarding and support will always be central

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 13 of 22
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 4: Position of Trust and Staff-to-Learner Allegations Protocol

All staff at Nova Newcastle Ltd hold a position of trust.

Any sexualised behaviour, inappropriate contact, communication or boundary violation between staff and learners is strictly prohibited.

Where an allegation involves a member of staff and a learner, Nova Newcastle Ltd will:

- immediately inform the DSL
- consider suspension as a neutral act
- refer to the Local Authority Designated Officer (LADO)
- refer to Police/Children's Social Care where required
- follow KCSIE and safeguarding procedures

Such conduct will normally be treated as gross misconduct.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 14 of 22
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 5: Sexual Harassment Risk Assessment Template (April 2026 Duty)

From 01 April 2026, Nova Newcastle Ltd must take proactive steps to prevent sexual harassment.

This includes identifying “risk hotspots” and putting controls in place.

Risk Area: _____

(e.g. corridors, transport, online spaces, unsupervised times)

Who may be at risk?

Staff / Learners / Visitors

Risk Factors Identified:

Current Controls:

Additional Preventative Actions Required:

Responsible Lead: _____

Review Date: _____

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 15 of 22
---	--------------------------------------	------------------------------------	-----------------------------

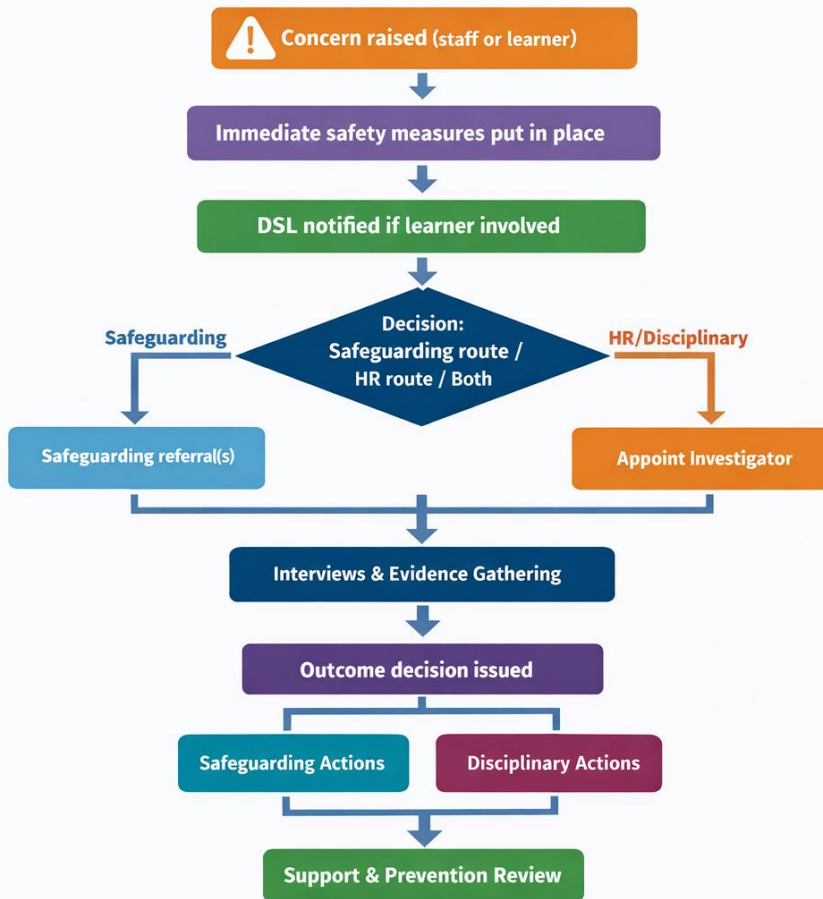


Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 16 of 22
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 6: Sexual Harassment Risk Assessment Template (April 2026 Duty)

APPENDIX F: INVESTIGATION PROCESS FLOW (SAFEGUARDING-FIRST)



Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 17 of 22
---	-----------------------------------	---------------------------------	---------------



APPENDIX 7: Support Pathway for Those Affected

Nova Newcastle Ltd will offer support to:

- the person experiencing harassment
- witnesses and bystanders
- learners affected
- staff accused (where appropriate, without compromising safeguarding)

Support may include:

- safeguarding mentoring
- counselling or EAP
- external advocacy services
- adjusted working or learning arrangements
- risk-managed reintegration plans

Support will be trauma-informed and confidential wherever possible.

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 18 of 22
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 8: Training and Compliance Record (Prevention Duty Monitoring)

Nova Newcastle Ltd will maintain training records to demonstrate compliance with the prevention duty.

Mandatory Training Includes:

- Sexual harassment awareness
- Professional boundaries and position of trust
- Safeguarding and child protection
- Peer-on-peer abuse and harmful sexual behaviour
- Reporting and whistleblowing
- Trauma-informed practice

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 19 of 22
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 9: Equality Impact Assessment

The organisation aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the Equality Act 2010. Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies.

In an Alternative Provision setting, consideration must also be given to the impact of policies and practice on **children and young people**, many of whom may be vulnerable learners, have SEND, experience trauma, or be at increased risk of exclusion or discrimination.

Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies, including both **staff and pupils/learners**, parents/carers, and wider stakeholders.

Ref #	Question	Yes	Comments
		No	
		N/A	
1	Does the document/guidance affect one group less or more favourably than another on the basis of:	No	
	Age	No	
	Race/Ethnic origins (including Gypsy, Roma and Traveller)	No	
	Sex (man or woman)	No	
	Gender Reassignment	No	
	Pregnancy/Maternity	No	
	Religion or Belief	No	

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 20 of 22
---	-----------------------------------	---------------------------------	---------------



	Sexual orientation including lesbian, gay and bisexual people	No	
	Marriage/Civil Partnership	No	
	Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
	Carers	No	
2	Is there any evidence that some groups are affected differently?	No	
3	If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?	No	
4	Is the impact of the document/guidance likely to be negative?	No	
5	If so, can the impact be avoided?	N/A	
6	What alternative is there to achieving the document/guidance without the impact?	N/A	
7	Can we reduce the impact by taking different action?	N/A	
8	Does this policy impact pupils with SEND, SEMH needs or Education, Health and Care Plans (EHCPs)?	No	
9	Could this policy lead to disproportionate behaviour sanctions, exclusions or barriers to reintegration for any protected group?	No	
10	Does this policy ensure reasonable adjustments are made so disabled pupils and staff can access education, support and services fairly?	Yes	
11	Does this policy promote inclusion and belonging for pupils who may experience	Yes	

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 21 of 22
---	-----------------------------------	---------------------------------	---------------



	discrimination, bullying or peer-on-peer abuse linked to protected characteristics?		
12	Does this policy support safeguarding duties, including protection from discriminatory bullying, online harassment and peer-on-peer abuse?	Yes	
13	Are there any barriers for parents/carers from diverse backgrounds (e.g., language, culture, disability) in accessing information or engaging with the organisation?	No	
14	Does this policy promote equality of opportunity in curriculum access, support planning and learner voice?	Yes	
15	Have pupils' individual vulnerabilities been considered, including those who are Looked After, Previously Looked After, or known to social care?	Yes	

For advice in respect of answering the above questions, or if a potential discriminatory impact has been identified, please contact the Designated Safeguarding Lead (DSL) or Equality and Diversity Lead.

Names and Organisation of Individuals who carried out the Assessment: Please give contact details.	Date of the Assessment
Name & Job Title: Rhea Marwaha, Director	15.04.2026

Policy Title: Sexual Harassment, Prevention and Action Policy	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 22 of 22
---	-----------------------------------	---------------------------------	-----------------------------