

## **Royal Drawing School Preventing Sexual Harassment Policy**

### **1. Overall Aim**

1.1 The Royal Drawing School is committed to preventing harassment, discrimination and victimisation at work. Sexual harassment will not be tolerated. Complaints will be taken seriously and not ignored, regardless of role or status.

1.2 This Policy sets out the School's expectations of behaviour by our employees, tutors, models and students and provides approaches for dealing with complaints of sexual harassment. It also responds to the Worker Protection (Amendment of Equality Act 2010) Act, which introduced a new legal duty on employers to take reasonable steps to prevent sexual harassment of their employees (the 'preventative duty').

### **2. Definitions and Scope**

2.1 Sexual harassment is unlawful under the Equality Act 2010 ('the Act'). It is also unlawful to treat someone less favourably because they have either submitted a complaint of sexual harassment or have rejected such behaviour. The Act defines sexual harassment as unwanted conduct of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

2.2 Conduct 'of a sexual nature' includes a wide range of behaviour, such as:

- Suggestive looks, staring or leering
- Propositions and sexual advances
- Intrusive questions about a person's private or sex life or a person discussing their own sex life
- Sexual posts or contact on social media
- Sending sexually explicit emails, images or text messages
- Unwelcome touching, hugging, massaging or kissing
- Unwanted sexual advances, propositions, or demands for sexual favours.
- Inappropriate comments about a person's body, appearance, or sexual orientation.
- Offensive jokes, slurs, or derogatory remarks about someone's gender or sexual orientation.
- Making lewd gestures or staring in a suggestive manner.
- Displaying or sharing vulgar materials, including pornography.
- Spreading sexual rumours or gossip about a person.
- Engaging in suggestive or inappropriate conversations or sharing sexual content without consent.

2.3 Sexual harassment can happen to men, women and people of any gender identity or sexual orientation. It can be carried out by anyone of the same sex, a different sex or anyone of any gender identity.

2.4 Sexual interaction that is invited, mutual or consensual is not sexual harassment because it is not unwanted. However, sexual conduct that has been welcomed in the past can become unwanted.

2.5 For the purposes of this Policy, 'employees' are defined as any individual either employed or engaged by the Royal Drawing School on a paid or unpaid basis to carry out work under any type of employment contract. This includes:

- Students or interns undertaking paid or unpaid work
- Tutors undertaking paid or unpaid work
- People designated as casual workers for the School.
- Agency workers

2.6 A student is considered to be any individual registered to study on any programme of study at the School, including summer school and short courses. Students may also be studying away from RDS Campus as part of their course.

2.7 A tutor is considered to be any individual registered to teach at the School, including summer school and short courses

2.8 People working on a voluntary basis at the School and those working as tutor, models and contractors are also bound by the terms of this Policy as is any person engaged with, or representing the School.

2.9 Victimisation of any individual making a complaint under this Policy will not be tolerated and will be dealt with under the RDS's Disciplinary Policy for staff or the Self-Employed Tutor and Model Code of Conduct for Tutors and Models.

2.10 Sexual harassment constitutes serious misconduct and could result in dismissal for employees or expulsion from the School for students, and termination of the Agreement for self employed tutors and models.

### **3. The preventative duty: expectations of staff**

3.1 The Worker Protection (Amendment of Equality Act 2010) Act introduces a legal duty on employers to take all reasonable steps to prevent sexual harassment of their staff.

This covers sexual harassment by other people at work or by third parties, for example students and contractors. All employees are expected to promote a positive and inclusive workplace culture where sexual harassment is not tolerated and where complaints are dealt with promptly, efficiently and sensitively.

3.2 Risk factors include, but are not limited to:

- meeting service users alone – please see the RDS Lone Worker Guidelines
- an environment where people are drinking alcohol
- work-related social events
- social media contact between staff
- power imbalances between staff
- travelling for work, including overnight stays

3.4 Examples of preventative measures include, but are not limited to:

- making it clear that sexual harassment will not be tolerated
- encouraging staff to report any incidents of sexual harassment
- encouraging staff to report situations where they felt at risk, even if nothing happened
- encouraging students, model and tutors to report any incidents of sexual harassment
- encouraging students, model and tutors to report situations where they felt at risk, even if nothing happened
- setting standards of behaviour for work social events

3.5 HR Business Partnering Teams can provide further guidance on the risk assessment process.

#### **4. Expected Standards of Behaviour for Students**

4.1 Sexual harassment by a student, tutor or model towards an employee and/or another student will be considered under the School's Student Disciplinary Regulations and action taken under this Procedure can include expulsion from the School.

#### **5. Reporting**

5.1 Any member of RDS, whether paid or unpaid is encouraged to formally report cases of sexual harassment whether they are the recipient of the behaviour or are witness to it as soon as reasonably practicable.

## **6. Reporting Channels for Employees**

6.1 Staff wishing to report another staff member should report to their line manager or HR Business Partner who can advise on how to proceed. Reports about the behaviour of a staff member will normally be progressed through the RDS Conflict Resolution Policy and Procedures.

6.2 Staff wishing to report a student should contact the Public Programme, Drawing Year, Young Artist or ODDY Team.

Reports about the behaviour of a student will normally be progressed through the Student Disciplinary Regulations and Procedure.

6.3 If an employee becomes aware of sexual harassment between a colleague and a student or another employee, or a tutor of model advice should initially be sought from their HR Business Partner.

6.4 Sexual harassment can also give rise to situations where there is coercive or predatory behaviour. If intimate relationships arise between colleagues and any person has concerns about any predatory or coercive element to such relationship, they are encouraged to report or disclose this to their line manager, or other relevant senior manager, who is obliged to ensure that such reports are recorded. The senior manager will liaise with HR to determine whether to make arrangements for an investigation to be undertaken.

## **7. Reporting Channels for Students**

7.1 Any student, tutor of model complaint relating to sexual harassment, including witnessing such behaviour, should be made to The Public Programme, Drawing Year, Young Artist or ODDY Team.

The relevant HR Team will be involved if the complaint is against an employee.

## **8. Investigations into Complaints or Allegations**

8.1 Any investigations into allegations of sexual harassment by employees will be conducted under the School Disciplinary Policy. Investigations into allegations of sexual misconduct by students, tutors or models will be conducted under Drawing Intensive student Handbook; for tutors and models the Code of Conduct; and for PP students the Code of Conduct

8.2 Sexual harassment may also lead to a criminal investigation being instigated into the actions of an employee or student. Where there are concerns that a criminal act has taken place, advice must be taken from the Head of HR and the RDS Director.

8.3 Confidentiality will be maintained, subject to any requirement to involve external agencies where a criminal offence may have been committed or where maintaining confidentiality would pose a risk to the person making the report, or to others.

8.4 Any investigation into allegations of sexual harassment will be dealt with in a confidential, sensitive and timely manner. The Investigating officer will keep in contact with all parties at each stage of the process and ensure that the matter is dealt with without any undue delay.

## **9. Support and Advice for Employees**

9.1 There are many sources of support available to employees prior to making a complaint or to both complainant and alleged perpetrator once a complaint has been made. These include:

### **1. Acas (Advisory, Conciliation and Arbitration Service)**

- **Website:** [Acas](#)
- **Phone:** 0300 123 1100
- **Email:** use the contact form on their website

### **2. Equality Advisory and Support Service (EASS)**

- **Website:** [EASS](#)
- **Phone:** 0808 800 0082
- **Email:** [adviceline@equalityadvisoryservice.com](mailto:adviceline@equalityadvisoryservice.com)

### **3. Citizens Advice**

- **Website:** [Citizens Advice](#)
- **Phone:** 0800 144 8848
- **Email:** use the contact form on their website

### **4. The Sexual Harassment Support Network**

- **Website:** [SHSN](#)
- **Phone:** 0800 093 5358

- Email: info@shsn.org.uk

### **10.9. Support and Advice for Students**

- The Public Programme Team will endeavour to give advice or signpost further agencies that may be of use.
- Young Artist DY and ODDY Students should get in touch with the relevant team, in addition to the resources listed above.

Policy created by	Sandie Rochfort, Head of HR	Date	October 2025
Policy Approved by	Harry Parker, Director	Date	October 2025
Version	1	Review Date	October 2026