Barkisland CE (VA) Primary School
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Sexual Harassment Policy for Teachers and Non-Teaching Staff in Schools & Academies

Author	Human Resources
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1	September 2024	S. Finnell	Created
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1. Adoption of the Policy

1.1 The Governing Body of Barkisland CE (VA) Primary School adopted this Policy on October 2026

1.2 The policy has been the subject of consultation with recognised trade unions.

2. Introduction

2.1 This policy/procedure does not form part of any employee's contract of employment and it may be amended by the Governing Body at any time following consultation with recognised trade unions.

2.2 This Policy has been designed for use with all employees of the school including the headteacher, teachers and non-teaching staff, including those employed temporarily, such as consultants, self-employed contractors, casual workers, agency workers and volunteers.

2.3 The generic terms 'school' and 'Headteacher' are used throughout for ease, but equally signify school/trust/academy and headteacher/principal respectively.

2.4 Respondent(s) are defined throughout the Policy as 'the person whom the allegation is made about'.

3. Purpose

3.1 With effect from the 26 October 2024, new legislation was brought in which introduces a new duty to prevent Sexual Harassment in the workplace under the Worker Protection (Amendment to the Equality Act 2010) Act 2023.

3.2 The purpose of this policy is to set out a framework for headteachers, to deal with the new duty to take reasonable steps to prevent sexual harassment of workers during their employment.

3.3 The school is committed to providing a working environment free from/zero tolerance towards sexual harassment and ensuring all employees are treated, and treat others, with dignity and respect.

3.4 It is recognised that sexual harassment can occur both in and outside the workplace, such as on school trips or at work-related events or social functions, or on social media.

3.5 Sexual harassment or victimisation of any employee, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. This can include a range of third parties such as consultants, contractors and agency workers, parents, suppliers or visitors to the school. The school will take active steps to help prevent sexual harassment and victimisation of all employees.

3.6 Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this Policy. This will enable the school to take appropriate action and provide support.

3.7 Sexual harassment can result in legal liability for both the school and the perpetrator, whether they work for the school or are a third party outside of the school's control.

3.8 Sexual harassment may result in disciplinary action up to and including dismissal.

4. Reasonable Steps to Prevent Sexual Harassment

4.1 There are a number of key areas to address as part of taking 'reasonable steps' to prevent sexual harassment:

- ensuring this Policy is enforced by taking a zero-tolerance stance, by setting a clear and consistent approach showing that sexual harassment will not be tolerated;
- carrying out risk assessments to identify where and when sexual harassment might occur and the preventative measures in place (See Appendix 1)
- provide training across all staff groups to ensure everyone is clear on what amounts to sexual harassment and the standards of acceptable behaviour;
- follow this policy should complaints of sexual harassment arise.

5. Application

5.1 When managing an employee's sexual harassment complaint, the school processes personal data collected in accordance with its Data Protection Policy on processing special categories of personal data. Data collected about an employee's sexual harassment complaint is held securely and accessed by and disclosed to individuals only for the purposes of managing their complaint under this Policy.

5.2 Inappropriate access or disclosure of employee data constitute as a data breach and should be reported in accordance with the school's Data Protection Policy immediately. It also may constitute a disciplinary offence, which will be dealt with under the school's Disciplinary Policy.

6. What is Sexual Harassment & Victimisation

6.1 Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment.

6.2 It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.

6.3 Sexual harassment may include, for example:

(a) unwanted physical conduct or “horseplay”, including touching, pinching, pushing and grabbing;
(b) continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
(c) sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
(d) unwelcome sexual advances or suggestive behaviour (which the respondent(s) may perceive as harmless); or
(e) offensive emails, text messages or social media content.

6.4 A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague’s computer in the workplace.

6.5 Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

(a) Bringing proceedings under the Equality Act 2010.
(b) Giving evidence or information in connection with proceedings under the Equality Act 2010.
(c) Doing any other thing for the purposes of or in connection with the Equality Act 2010.
(d) Alleging that a person has contravened the Equality Act 2010.

6.6 Victimisation may include, for example:

(a) Denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment.
(b) Excluding someone because they have raised a grievance about sexual harassment.
(c) Failing to promote someone because they accompanied another employee to a grievance meeting.
(d) Dismissing someone because they gave evidence on behalf of another employee at an employment tribunal hearing.

6.7 Sexual harassment and victimisation are unlawful and will not be tolerated. They may lead to disciplinary action up to and including dismissal if they are committed:

(a) In a work situation.
(b) During any situation related to work, such as at a social event with colleagues.
(c) Against a colleague or other person connected to the school outside of a work situation, including on social media.
(d) Against anyone outside of a work situation where the incident is relevant to their suitability to carry out their role.

6.8 The school will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

6.9 If any sexual harassment or victimisation of employees occurs, the school will take steps to remedy any complaints and to prevent it happening again.

7. What is Third Party Harassment

7.1 Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, unwelcome sexual advances from a third party visiting the employer's premises, or where a person is visiting the school's premises.

7.2 Third-party sexual harassment can result in legal liability and will not be tolerated. All employees are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this Policy.

7.3 Any sexual harassment by an employee against a third party may lead to disciplinary action up to and including dismissal.

7.4 The school will take active steps to try to prevent third-party sexual harassment of employees. [These may include warning notices/posters or recorded messages at the beginning of telephone calls.]

7.5 If any third-party harassment of employees occurs, the school will take steps to remedy any complaints and to prevent it happening again. These may include warning the respondent(s) about their behaviour, banning them from our school, reporting any criminal acts to the police.

8. If an employee is being Sexually Harassed: Informal Steps

8.1 If an employee is being sexually harassed, they should consider whether they feel able to raise the problem informally with the person responsible. Explaining clearly to them that their behaviour is not welcome or makes the employee feel uncomfortable. If this is too difficult, then the employee should speak to their line manager. If this is not possible then they may discuss their concerns with a more senior manager or the Trade Union if the employee is in a Trade Union or contact HR, who can provide confidential advice and assistance to resolving the issue formally or informally. If this does not resolve the issue, the employee should follow the formal procedure.

8.2 If the complaint is about the headteacher, then the employee should discuss this first with the headteacher; if this is not possible then they should forward their complaint to the Chair of Governors.

8.3 If an employee is uncertain whether an incident or series of incidents amounts to sexual harassment, they should contact their line manager.

8.4 If informal steps are not appropriate, or have been unsuccessful, the employee should follow the formal procedure set out below.

9. Raising a formal complaint

9.1 If an employee wishes to make a formal complaint about sexual harassment, they should submit it in writing to the headteacher. If the matter concerns the headteacher, they should forward their concerns to the Chair of Governors.

9.2 The employee's written complaint about Sexual Harassment should set out full details of the conduct in question, including the name of the respondent(s), the nature of the sexual harassment, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

9.3 If an employee wishes to make a formal complaint about victimisation, they should submit it in writing to the headteacher. If the matter concerns the headteacher, they should forward their concerns to the Chair of Governors.

9.4 The employee's complaint should set out full details of the conduct in question, including the name of the person or persons they believe they have been victimised by, the reason they believe they have been victimised, the nature of the victimisation, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

9.5 As a general principle, the decision whether to progress a complaint is up to the employee. However, the school has a duty to protect all employees and may pursue the matter independently if, in all the circumstances, the school considers it appropriate to do so.

10. If an employee witnesses sexual harassment or victimisation

10.1 Employees who witness sexual harassment or victimisation are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:

(a) Intervening if the employee feels able to do so.
(b) Supporting the victim to report it or reporting it on their behalf.
(c) Reporting the incident if the employee feels there may be a continuing risk if it is not reported.
(d) Co-operating in any investigation into the incident.

10.2 All witnesses will be provided with appropriate support and will be protected from victimisation.

11. Formal Investigations

11.1 Following receipt of the complaint, a formal meeting will be arranged without unreasonable delay. Where appropriate, a fact finding exercise/investigation may be undertaken in the first instance to provide a better understanding of the issues and concerns. The manager of the process may commission an appropriate independent person to do this.

11.2 The school may consider suspending the employee on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. However, contact with the school's HR provider should be made as soon as possible.

11.3 Employees will have the right to be represented by a work colleague or a trade union representative.

11.4 The investigator will also meet with the respondent(s) to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

11.5 It may be necessary to interview witnesses to any of the incidents mentioned in the complaint. If so, the importance of confidentiality will be emphasised to them.

11.6 If the complaint is about someone other than an employee, such as a contractor, supplier or visitor, then the headteacher will consider what appropriate action to be taken, such as discussing the matter with the third party.

11.7 If the employee requests to make any changes to their own working arrangements during the investigation, for example, may request to change duties or working hours to avoid or minimise contact with the respondent(s), then this will be looked into.

11.8 The headteacher, Governor or delegated manager will decide on appropriate action and confirm the outcome in writing as soon as practically possible, as well as notifying the complainant of their right of appeal.

12. Actions following the investigation

12.1 If the headteacher, Governor or delegated manager considers that there is a case to answer and the respondent(s) is an employee(s), the matter will be dealt with as a case of possible misconduct or gross misconduct under the School's Disciplinary Procedure. If the respondent(s) is a third party, such as a customer or other visitor, the school will consider what action would be appropriate to deal with the issue(s).

12.2 The investigation into the employee's complaint may be put on hold pending the outcome of the Disciplinary Procedure.

12.3 Whether or not the employee's complaint is upheld, the school will consider how best to manage the ongoing working relationship between the employee and the

person concerned. It may be appropriate to arrange some form of mediation or counselling, or to change the duties, working location or reporting lines of one or both parties.

12.4 Any employee who deliberately provides false information in bad faith, or who otherwise acts in bad faith as part of an investigation, may be subject to action under the School's Disciplinary Procedure. However, the employee will not be disciplined or treated detrimentally because their complaint has not been upheld.

13. Appeals

13.1 If the employee continues to be aggrieved in respect of their original complaint they can appeal to the Appeals Committee of the Governing Body (within 10 working days of receiving the written outcome of the formal investigation).

13.2 The employee will need to register their appeal stating precisely:

- What parts of the decision they dispute.
- The grounds for disputing the decision/outcome.
- How they want their complaint to be resolved.

13.3 The Appeal Panel will consist of up to three Governors who have not been involved with the complaint previously.

13.4 Appeals are a re-hearing and re-examination of the case at the investigation stage of the procedure.

13.5 Documents other than those previously circulated should not be tabled on the day of the hearing, unless new information has come to light since the investigation meeting, in which case the Chair of the Panel will exercise their discretion in deciding whether to accept them for consideration.

13.6 The Appeal Hearing shall take place in a reasonable timeframe.

13.7 The employee will be informed in writing of the outcome of the Appeal Hearing as soon as possible following the Appeal Hearing.

13.8 The decision of the Appeal Hearing is final.

14. Protection and Support for those involved

14.1 Employees who make complaints, report that they have witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under the School's Disciplinary Procedure.

14.2 If anyone believes they have suffered any such treatment they should inform their line manager. If the matter is not remedied, they should raise it formally using this policy.

14.3 The school will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation received to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

14.4 Support and guidance can also be obtained from Trade Unions or any of the following external services:

- The Equality Advisory and Support Service *www.equalityadvisoryservice.com*)
- Protect (*www.protect-advice.org.uk*)
- Victim support (*www.victimsupport.org.uk*)
- Rape crisis (*www.rapecrisis.org.uk*)
- Rights of women (England and Wales) (*www.rightsofwomen.org.uk*)

15. Reporting Outcomes, Confidentiality and Record Keeping

15.1 Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a “need to know” basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.

15.2 When appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and any measures put in place to prevent a similar event happening again.

15.3 Information about a complaint by or about an employee may be placed on their personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with the School’s Data Protection Policy.



Calderdale Council

Appendix 1: Sexual Harassment – Risk Assessment Form

On 26th October 2024, the new Worker Protection (Amendment of Equality Act 2010) Act 2023 came into force. The Act introduces a new duty on employers to take reasonable steps to prevent sexual harassment of their workers 'in the course of their employment'.

Please use this risk assessment proforma to document that you have assessed the risk of workers being exposed to sexual harassment in the workplace and determined the reasonable measures that can be taken to mitigate those risks.

Section 1: Assessment Details

Name of person completing this assessment:	Sarah Wilde
Date assessment completed:	September 2026
Review date:	September 20207
Area(s) of the School covered by this risk assessment:	All
Name of Chair of Governor signing off this assessment:	Ashley Kingston
Date assessment signed off:	October 2026

Section 2: Questionnaire

This questionnaire is designed to assist Headteachers to assess the risks of sexual harassment to staff.

If the answer to any of the following questions is "YES" then the risk factor should be examined further, and control measures be put in place to mitigate the risk. These should be outlined in the remedial action plan/risk assessment in section 3 of this document.

Question	Y	N	Teams this statement applies to within the School (Please list below)
I have staff who work alone with limited supervision and support.	X		Premises Manager Headteacher
I have staff that undertake night working and/or work out of hours.		X	
Gendered power imbalances could exist within the School.	X		SLT
The School consists of a predominantly all female / all male workforce.	X		Predominantly all female
The School serves alcohol to the public in some capacity.	X		BSA events
I have members of staff that are likely to come into contact with individuals under the influence of alcohol or other intoxicating substances.	X		BSA events – staff supporting these events
I have staff who regularly interact with third parties including Parents, contractors, visitors etc.	X		All staff
The School has staff on casual contracts, or where there is a general lack of job security.	x		Some casual kids club staff
I have staff in the School that are customer facing.	X		All staff
There is a lack of diversity amongst senior leadership in the School.	X		All White British
I have staff or teams that are involved in work/projects that could raise local and national tensions.		X	
There have been parts of the School that tolerate certain attitudes, inappropriate behaviours, or stereotypical views.		X	
There are staff within the School that have been placed on	X		Office Manager New TA in Year 2 starting Nov 26

secondment or newly appointed members of the team.			
The School employs staff that during the course of their duties will work remotely, working from different work locations or in the community e.g. Pastoral Staff	X		PSW home visits(but always with another staff member ideally a senior leader) ; teachers PPA at home
I have staff that sometimes attend events outside of normal working hours.	X		Residentials, information evenings and BSA events
Socialising outside work is common within my School	X		
I am aware that social media contact exists between workers (or workers and third parties e.g., contractors) in my School.	X		Staff who are parents and staff who are related to contractors.
There has been previous incident of sexual harassment through contacts such as email, face to face interactions, telephone conversations, physical, non-physical etc.		X	
There have been previous failures to respond to allegations of harassment or sexual harassment.		X	
There are a lack of supportive policies and procedures within the School with regards to harassment and sexual harassment.		X	
The School employs staff with intersectional risks i.e. someone with more than one protected characteristic e.g. race and disability.	X		Yes – a small number of staff in school
There are roles in the School where individuals may have access to personal information, for example contact numbers, and as such there is a risk in someone using these to pursue intentions of sexual harassment.	X		Office staff, SLT, Kids Club Manager

Remedial Action Plan/Risk Assessment

Please amend/delete as appropriate. If the risk factor was not identified in the questionnaire in section 2 above, please state N/A or delete the whole row. Suggested control measures to mitigate risk can be found in Appendix 1 below.

The overall opinion of the assessor is that the risk of sexual harassment in this service is:				
LOW		**MEDIUM**		**HIGH**

Risk Factor	How might people be at risk?	Measures already taken	Risk Rating (H-M-L)	Further actions required	Residual Risk Rating (H-M-L)	Action by whom?	Action by when? (Target date for completion)
Lone Working	Staff working alone may have reduced immediate supervision or support.	Lone-working procedures in place. Staff avoid meeting parents/visitors alone where concerns are known. Other staff are aware when colleagues remain on site. Secure access arrangements are in place.	L	Remind staff to follow lone-working procedures and report concerns immediately.	L	Headteacher / SLT	Ongoing
Night and/or out of hours working	Night/out-of-hours working may increase vulnerability because fewer colleagues are present.	N/A - school does not routinely operate with staff working alone at night.	N/A	N/A	N/A	N/A	N/A
Gendered Power Imbalances	Power imbalances can make individuals feel less able to challenge or report inappropriate behaviour.	Equality Policy; Staff Handbook; safeguarding/privacy training; HR support; grievance, complaints and whistleblowing procedures; clear reporting routes.	L	Ensure sexual harassment expectations and reporting routes are explicitly revisited with staff.	L	Headteacher / SLT	Annually
Male Dominated Workforce	A strongly male-dominated workplace may increase the likelihood of sexist or	N/A - school workforce is not male dominated.	N/A	N/A	N/A	N/A	N/A

	inappropriate workplace culture.						
Presence of Alcohol	Alcohol may reduce inhibitions and increase the likelihood of inappropriate behaviour.	Alcohol is not consumed during the normal working day. At occasional staff/social events attendance and alcohol consumption are optional. Professional standards continue to apply.	L	Remind staff that professional standards apply at work-related social events.	L	SLT	Ongoing
Third party contact	Regular contact with parents, visitors, contractors or suppliers can expose staff to inappropriate behaviour.	Visitors sign in and access is controlled. Staff are not usually alone with visitors. Parent meetings can be supported by SLT/additional staff. Staff can request support where concerns are known.	L	Ensure staff know to report inappropriate comments, behaviour or contact from third parties.	L	SLT	Ongoing
Job Insecurity or casual workforce	Temporary or casual workers may feel less confident reporting concerns.	Where supply/temporary staff are used, they receive appropriate induction and have access to the same reporting procedures and protections as permanent staff.	L	Continue to include key conduct and reporting information within induction.	L	Headteacher / SLT	As required
Customer facing duties	Frequent interaction with parents and the public may expose employees to inappropriate comments or behaviour.	Parents/contractors are authorised and sign in. Staff are present around school. Meetings can be supported by SLT. Staff do not have to tolerate inappropriate or abusive behaviour.	L	Ensure staff know how to summon support or end a meeting where behaviour becomes inappropriate.	L	SLT	Ongoing
Lack of diversity in the workforce	A lack of diversity may create power imbalances or leave some staff feeling less able to speak up.	Equality & Diversity Policy and training; Staff Handbook; safer recruitment; safeguarding; whistleblowing/grievance procedures; clear expectations of respectful behaviour.	L	Continue equality, safeguarding and appropriate workplace-behaviour training.	L	Headteacher / SLT	Annually
Events that raise local and national tensions	Strong reactions to local/national events can contribute to hostile or disrespectful workplace behaviour.	School monitors emerging safeguarding/community issues. Staff are expected to maintain respectful professional conduct.	L	Respond to emerging issues through staff briefings and/or updated risk assessment where required.	L	Headteacher / DSL	As required

		Reporting routes are established.					
Unprofessional Environment (cultural norms within the workplace)	A culture tolerating inappropriate attitudes, sexualised comments, stereotypes or 'banter' can increase risk.	Staff Code of Conduct; Equality Policy; safeguarding procedures; Staff Handbook; clear professional expectations; accessible SLT; grievance and whistleblowing procedures.	L	Remind staff that sexual harassment, sexualised comments/'banter' and inappropriate behaviour are unacceptable and explain reporting routes.	L	Headteacher / SLT	Autumn 2026 / annually
Workers placed on secondment/new starters	New staff may be unfamiliar with colleagues, workplace expectations and reporting structures.	Induction procedures; Code of Conduct shared; safeguarding induction; key policies provided; line manager/SLT support and reporting/whistleblowing routes available.	L	Include sexual harassment expectations and reporting arrangements explicitly within staff induction.	L	Headteacher / SLT	On induction
Remote Workers	Isolated or unsupervised work, including off-site visits, may increase vulnerability.	Visits diarised and normally undertaken during the school day. Lone visits only where authorised. Safeguarding procedures/training in place; staff remain contactable.	L	Ensure whereabouts and expected return are known for off-site visits and concerns are reported to SLT.	L	SLT	Ongoing
Attending events outside normal working hours	Training, conferences or work events can present different environments and may involve alcohol.	Risk assessments undertaken where appropriate. More than one member of staff attends where possible. Safeguarding procedures and Staff Code of Conduct continue to apply.	L	Remind staff that normal professional conduct and reporting arrangements continue to apply.	L	SLT	Ongoing
Socialising outside work	Less formal work-related social settings can increase the likelihood of unwanted advances or inappropriate behaviour.	Staff Code of Conduct and professional standards are in place. Staff understand expected standards of behaviour.	L	Remind staff that work-related social events remain subject to expected standards, including where alcohol is consumed.	L	Headteacher / SLT	Annually
Social media contact between workers	Online contact can provide a platform for unwanted sexual comments, advances or imagery.	Safeguarding training; Social Media Policy; Acceptable Use/IT Policy; Staff Code of Conduct; training on appropriate online conduct.	L	Remind staff that harassment standards and reporting procedures also apply to online/social-media communication.	L	SLT	Annually
Failure to respond to previous allegations	Failure to respond appropriately can reduce confidence in reporting and allow risks to continue.	No known previous allegations or failures to respond. Safeguarding, grievance, disciplinary, whistleblowing and HR procedures are established.	L	No additional action required. Any future allegation will be acted upon promptly under the relevant procedure.	L	Headteacher / Governing Body as appropriate	Ongoing

Employees with more than one intersectional risk	Some employees with multiple protected characteristics may statistically be at greater risk of harassment.	Equality Policy; Equality & Diversity training; Staff Code of Conduct; safeguarding procedures; safer recruitment; whistleblowing/grievance procedures; commitment to equality and inclusion.	L	Ensure staff know confidential reporting routes and that concerns relating to protected characteristics will be taken seriously.	L	Headteacher / SLT	Ongoing
Lone Working	Staff working alone may have reduced immediate supervision or support.	Lone-working procedures in place. Staff avoid meeting parents/visitors alone where concerns are known. Other staff are aware when colleagues remain on site. Secure access arrangements are in place.	L	Remind staff to follow lone-working procedures and report concerns immediately.	L	Headteacher / SLT	Ongoing

Suggested Control Measures

Please note, the following are not exhaustive lists of potential control measures

Generic Controls

- The School has a Sexual Harassment Policy
- Provide employees with access to counselling or support services if they experience sexual harassment.
- Regular training on recognising and reporting sexual harassment.
- The School to monitor cases of sexual harassment events and review if necessary.

Lone Working

- Lone working policies and procedures
- Regular check ins with lone workers
- Panic buttons, CCTV, other security measures etc.
- Working in pairs
- Bystander training

Evening/Out of School Hours/Night Working

- Implementing security measures such as well-lit work areas, security cameras, and access controls can deter potential harassers.
- Headteacher/SLT should conduct regular check-ins with evening/out of school/night workers to assess their safety and wellbeing.
- Implementing a buddy system where employees work in pairs during night shifts can provide additional support and safety (if applicable).
- Fostering a workplace culture that encourages open communication and reporting of harassment is crucial.

Power Imbalances

- Training for SLT/managers aimed at preventing abuses of power
- Training for SLT/managers involved in handling sexual harassment complaints.

All Female/All Male Dominated Workforce

- Fostering a workplace culture setting out expected standards of behaviour in line with the School's Code of Conduct/Handbook and Sexual Harassment Policy.
- Regular EDI training.

Alcohol

- Work-related social events policy setting out expected standards of behaviour
- Appropriate supervision and adequate staffing levels.
- Designate staff members as points of contact for individuals to report concerns and seek assistance.

Third Party Contacts

- Training on handling difficult interactions with third parties.
- Training for SLT/managers to support staff who are subjected to harassment by third parties.
- Zero tolerance approach communicated to third parties.

Job Insecurities

- Fostering a culture of respect and open communication can help employees feel more empowered to address harassment concerns.
- Employees with union representation may have more leverage to address harassment issues without fear of job repercussions.

Customer Facing Roles

- Regularly train all employees on recognizing and reporting sexual harassment, including how to de-escalate situations with difficult customers.
- Ensure employees have accessible methods to report harassment incidents, including confidential reporting options.
- Bystander intervention - Encourage employees to intervene and support colleagues facing harassment from customers.
- Provide employees with access to counselling or support services if they experience sexual harassment.
- Foster a culture of respect where employees feel empowered to speak up against inappropriate behaviour without fear of retaliation.

Lack of Diversity

- Confirm demographics of individuals in leadership and management roles.
- Regular EDI training for all staff in School, with a focus on unconscious bias.
- Reverse mentorship scheme where senior leaders and managers can learn from each other’s lived experiences.
- EDI events and workshops
- Actively recruit and retain a diverse workforce across all levels of the organisation. Encourage job applications for senior leadership positions from as diverse a range of people as possible.
- Provide training for all employees on sexual harassment prevention, including awareness of power dynamics and the importance of reporting misconduct.

- Encourage open communication and create a safe environment where employees feel empowered to speak up about concerns without fear of retaliation.

Particular events that raise tensions locally and nationally

- Reminders on the School's zero tolerance policy to sexual harassment.
- Regular check-ins with employees during any such event to ensure their wellbeing and help identify any potential issues.

Cultural Norms

- Promoting gender equality by challenging traditional gender roles and emphasising equal power dynamics between genders.
- Creating environments where individuals feel comfortable discussing and reporting sexual harassment without fear of retaliation.
- Bystander intervention training - Empowering individuals to actively intervene when they witness potentially harassing behaviour.
- Educating communities about what constitutes sexual harassment and the importance of reporting it.
- Adopting a system that supports those affected by sexual harassment including access to employee assistance programmes, workplace mediation, and counselling.
- Regular EDI training for all staff in the School, with a focus on unconscious bias.
- Monitor workplace culture through anonymous surveys, exit interviews, one-to-one conversations, shared conversations, and return to work meetings to identify any high-risk issues.
- Engage workplace champions who are trained in sexual harassment.

Secondments

- Both sending and receiving organisations should clearly communicate expectations regarding workplace behaviour, anti-harassment policies, and reporting procedures to seconded employees.
- Assign a designated "buddy" within the new team to support the seconded employee and provide guidance on navigating the workplace dynamics.
- Conduct regular check-ins with seconded employees to monitor their wellbeing and address any concerns they may have.
- Ensure all employees involved in a secondment receive comprehensive training on sexual harassment awareness and prevention.

Remote Workers

- Provide regular sexual harassment training for all mobile workers, emphasizing awareness of potential risks, reporting procedures, and assertive communication techniques.
- Establish clear and accessible channels for reporting harassment, including anonymous options, and ensure timely investigations and appropriate actions.
- Conduct regular risk assessments to identify high-risk situations and locations, and develop preventive strategies tailored to those areas.
- Consider implementing a buddy system where mobile workers can check in with a colleague, especially when working in isolated areas.
- Provide guidelines on safe interaction with clients, including appropriate communication boundaries, and procedures for handling potentially harassing situations.
- Utilize technology like GPS tracking, dedicated communication tools, and safety apps to monitor employee locations and provide support when needed.
- Foster a culture where mobile workers feel comfortable discussing concerns with their supervisors and reporting any potential harassment without fear of retaliation.

Socialising Outside Work/attending events outside normal working hours (School residentials)

- Establish clear expectations of behaviours as per the School's Code of Conduct/Staff Handbook at social events/events outside of normal working hours and communicate this to all involved. It would include any conduct that could bring the School into disrepute.
- Appoint managers or representatives to monitor events and intervene if necessary.
- Ensure employees have clear ways to leave a situation they feel uncomfortable in.
- Conduct assessments of potential risks at social events and implement preventive measures.
- Clearly outline how to report incidents of harassment that occur outside of work hours.

Social Media

- Social media policy - Set clear guidelines for monitoring employee social media activity, focusing on potential issues related to work and professional conduct.
- Create accessible channels for employees to report instances of social media harassment, including anonymous reporting options i.e. via Whistleblowing.

Failure to respond to previous allegations

- Headteacher/Managers to take all sexual harassment allegations seriously and follow the Sexual Harassment Policy, failure to follow policy could result in the Disciplinary Policy being instigated.
- Training for those involved in handling sexual harassment complaints.

Employees with intersectional risks, ie someone with more than one protected characteristic, eg race and disability

- Regular EDI training for all staff in the school, with a focus on unconscious bias.
- Foster a culture where workers feel comfortable discussing concerns with their supervisors and reporting any potential harassment without fear of retaliation.
- Clear policies outlining reporting procedures, consequences for harassment, and protections against retaliation to encourage victims to speak up in line with the Whistleblowing Policy.