PREVENTION OF SEXUAL HARASSMENT POLICY

Policy statement

We are committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect. We recognise that sexual harassment can occur both in and outside the workplace, such as on excursions, trips, at school related events or social functions, or on social media.

Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. The law requires employers to take all reasonable steps to prevent sexual harassment of their staff during the course of their employment. We will take proactive steps to prevent the sexual harassment and victimisation of all staff. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. Sexual harassment constitutes a breach of our Staff Behaviour Policy and may result in disciplinary action up to and including dismissal.

About this policy

The purpose of this policy is to set out a framework for managers to deal with sexual harassment that occurs by staff (which may include consultants, contractors and agency workers) and also by third parties such as parents, suppliers, volunteers or visitors to our premises. It should be read in conjunction with our Anti-Harassment and Bullying Policy but is intended to address, specifically, the issue of sexual harassment.

The policy covers sexual harassment which occurs at work and out of the workplace, such as on School trips or at work-related events or social functions, or on social media.

This policy does not form part of any contract of employment, and we may amend it at any time.

Who does this policy apply to?

This policy applies to all employees and third parties as outline above.

Who is responsible for this policy?

The Board of Governors has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the Senior Leadership Team.

This policy is reviewed annually by the HR Department and we will take steps to monitor its effectiveness.

What is sexual harassment?

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.

It includes harassment related to certain 'protected characteristics' – for example sex, sexual orientation and gender reassignment.

It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct relating to protected characteristics.
Sexual harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
- 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);
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); or
- offensive emails, text messages or social media content.

A person may be sexually harassed even if they were not the intended target.

Sexual harassment is unlawful, will not be tolerated and may lead to disciplinary action up to and including dismissal.

Third-party sexual harassment
Third-party sexual harassment occurs where a person is 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 sexual harassment could include, for example, unwelcome sexual advances from a supplier visiting the school's premises.

Third-party sexual harassment can result in legal liability and will not be tolerated. The law requires the school to take all reasonable steps to prevent sexual harassment by third parties All staff are encouraged to report any third-party sexual harassment they are a victim of, or witness, in accordance with this policy.

If any third-party sexual harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. These steps may include warning the harasser about their behaviour, banning them from our premises and reporting any criminal acts to the police.

Any sexual harassment by a member of staff against a third party may lead to disciplinary action up to and including dismissal.

Preventative steps
We are committed to taking proactive steps to prevent the sexual harassment of our staff. These steps include:

- A review of the risk assessment when this policy is reviewed or sooner if necessary.

- Making all staff aware of what constitutes harassment and what to do if staff witness or experience harassment, by clearly communicating and making our policies available to all staff and including them in the induction pack.
- Ensuring existing policies cover harassment and sexual harassment effectively.
- Clearly communicating sexual harassment policies and procedures to visitors by making them available when they sign in.
- Ensuring appropriate support (where appropriate) is available to staff following a complaint.
- Responding in a timely fashion to complaints and learning from any issues identified.
- Adopting a zero-tolerance policy to third-party sexual harassment.
- Encouraging staff to report any instances of third-party harassment.
- Training all staff.

If you are being sexually harassed: informal steps

If you are being sexually harassed, consider whether you feel able to raise the problem informally with the person responsible. If you feel comfortable doing so, you should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. We recognise, however, that this may be difficult or inappropriate depending on the circumstances. If this is the case, or raising the problem with the person responsible has not resolved the issue, you may speak to your line manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

If you feel unable to speak to your line manager for any reason, you may speak to HR.

If you are not certain whether an incident or series of incidents amounts to sexual harassment, you should initially contact HR informally for confidential advice.

Raising a formal complaint

If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure which you will find on the staff area of the school website. The matter will then be dealt with as a formal grievance in line with our Grievance Procedure.

If, following the conclusion of the grievance process, we consider you have been sexually harassed by an employee the matter will be dealt with under our Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the alleged perpetrator is a third party such as a parent or visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

As a general principle, the decision whether to progress a formal complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

If you witness sexual harassment

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

- Intervening where you feel able to do so
- Supporting the victim to report it or reporting it on their behalf

- Reporting the incident where you feel there may be a continuing risk if you do not report it
- Co-operating in any investigation into the incident

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

Protection and support for those involved
Staff 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 our Disciplinary Procedure.

If you believe you have suffered any such treatment you should inform HR. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

We will monitor the treatment and outcomes of any complaints of sexual harassment we receive 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, and workforce training is targeted where needed.

Support and guidance can also be obtained from 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).

Confidentiality and record-keeping
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.

Information about a complaint by or about a staff member 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 our Data Protection Policy and Staff Privacy Notice.

November 2026

Annex A - Sexual Harassment Risk Assessment Form **Assessor :** Maura Brittain **Date :** 11.11.2026								
Risk factors:	**Who might be at risk and why (list all that apply):**	**How we have assessed the risk:**	**Steps already taken to reduce those risks:**	**Further action necessary:**	**Who is responsible for taking action?**	**Date action to be completed?**	**Done**	**Any remaining significant risks:**
1. Lone working	Staff who work alone may face increased risks of sexual harassment due to limited supervision or support.	Considered any reported incidents of harassment while an individual was lone working. None have occurred.	The School has adopted a robust Anti-Harassment and Bullying policy that explicitly addresses sexual harassment. This policy includes clear examples of sexual harassment, and a comprehensive reporting procedure. The policy is accessible to all staff via the staff portal. The school has provided comprehensive training to staff on recognising and	(1) Continue conducting regular check-ins with lone workers to ensure their wellbeing and help identify any potential issues. (2) Consider the implementation of safety measures, such as panic buttons or CCTV cameras, which may serve as deterrents and provide a sense of security. (3) Make efforts to ensure that there are always two members of staff on duty whenever	Bursar	Ongoing		Risk is felt to be very low

			reporting sexual harassment, bystander intervention and the consequences of sexual harassment. The training focused on creating a supporting environment and empowering staff to speak up. This training also covered how to handle difficult interactions with third parties, setting boundaries, and empowering individuals to remove themselves from difficult situations.	possible.				
2. Power Imbalances	Staff who are in subordinate positions may be at higher risk of experiencing sexual harassment. This is because the power imbalances that exist in such in such relationships can create opportunities for exploitation. It may also be more difficult for individuals in these subordinate positions to speak up			(1) Provide additional training for managers that is aimed at preventing abuses of power and their role in preventing and stopping bullying and harassment from occurring in the workplace. (2) Ensure managers involved in handling sexual harassment	Bursar	Ongoing		Risk is felt to be very low

	due to fear of negative consequences or retaliation.			complaints are given appropriate training to address the complexities of cases involving power imbalances and the need to be independent and not influenced by any conflicts of interests.				
3. Presence of Alcohol	Staff attending work-related social events where alcohol is consumed may be more vulnerable to sexual harassment. Alcohol consumption can impair judgement and lower inhibitions, potentially leading individuals to behave in ways that they would not in a sober state.			(1) For social events ensure there is appropriate supervision and adequate staffing levels to monitor and address any potential incidents of sexual harassment promptly. (2) Reinforce relevant policies leading up to these events to remind staff and attendees about the importance of	Bursar	Ongoing		Risk is felt to be very low

				ensuring a safe environment, free from discrimination, bullying or harassment.				
4. Third-Party Contact	Staff who regularly come into contact with third parties, may be more vulnerable to sexual harassment due to a higher frequency of interactions.			(1) Ensure that the organisation's zero tolerance approach to sexual harassment is communicated to third parties via email and notices displayed in public areas of the workplace.	Bursar	Ongoing		Risk is felt to be very low

5. Lack of Diversity	A lack of diversity in senior leadership and managerial roles can result in a significant power imbalance, which may lead to women and groups from other underrepresented backgrounds throughout the organisation feeling marginalised, more vulnerable to sexual harassment and less empowered to speak up due to fear of retaliation.	The organisation has analysed the demographics of individuals in senior leadership and managerial roles. We have concluded that **72%** of individuals in senior leadership roles and **72%** of individuals in managerial roles are male.	The organisation has adopted a robust Anti-harassment and anti-bullying policy that explicitly addresses sexual harassment. This policy includes clear examples of sexual harassment, and a comprehensive reporting procedure. The organisation has also adopted an Equal Opportunities policy. Both policies are accessible to all staff via the staff portal.	Take reasonable and appropriate steps to encourage job applications for senior leadership and managerial roles from as diverse a range of people as possible. All Job adverts include a statement around diversity.	Bursar	Ongoing		Risk is felt to be very low
6. Particular events that raise tensions	Events that raise tensions locally or nationally can create strong reactions, polarise opinions and	The organisation has considered all reported incidents and formal	The organisation has adopted a robust Anti-harassment and anti-bullying	(1) Provide comprehensive training to staff on recognising and reporting sexual	Bursar	Ongoing		Risk is felt to be very low

locally or nationally	create division in the workplace. In such environments, individuals may feel compelled to assert their beliefs forcefully, sometimes leading to harassment or hostile behaviour towards those in the workplace with differing perspectives.	complaints that involved sexual harassment during particular events that raised tensions locally or nationally. None have occurred	policy. This policy includes clear examples of sexual harassment and a comprehensive reporting procedure. The policy contains multiple reporting channels to ensure that staff can safely report incidents of sexual harassment, even if the harasser is in a position of power. The inclusion of multiple reporting channels ensures impartiality and protection against negative consequences or retaliation. The policy is accessible to all staff via the staff portal	harassment, bystander intervention and the consequences of sexual harassment. (2) Remind staff of the organisation's zero tolerance approach to discrimination, bullying harassment and sexual harassment in the workplace during any such event and reinforce the Anti-bullying and harassment policy. (3) Conduct regular check-ins with workers during any such event to ensure their wellbeing and help identify any potential issues.				

7. Cultural norms at the workplace	A workplace culture that tolerates certain attitudes, inappropriate behaviours and stereotypical views where employees are not treated with dignity and respect may make staff more vulnerable to sexual harassment.	The organisation has considered all reported incidents and formal complaints that involved sexual harassment. We have concluded that there has not historically been a workplace culture that has made staff vulnerable to sexual harassment as no incidents have been formally reported.	The organisation has adopted a robust Anti-harassment and anti-bullying policy. This policy includes clear examples of harassment, including sexual harassment, and a comprehensive reporting procedure. The organisation has also adopted an Equal Opportunities policy. Both policies are accessible to all staff via the staff portal. We have started to carry out exit questionnaires with staff leaving.	(1) Monitor our workplace culture through , exit interviews, one-to-one conversations and return-to-work meetings to identify and address any high risk issues. (2) Ensure Anti-harassment and anti-bullying policy is reviewed and communicated to staff regularly.	Bursar	Ongoing		Risk is felt to be very low