

# Procedure and risk assessment on preventing sexual harassment in schools:



## Holywell Village First School

To be read in conjunction with the following Policies:

- Resolving Grievances at Work
- Dignity at Work Policy
- Code of Conduct

## 1. Introduction

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.

This guidance is designed to help school leaders and Governing Bodies create a safe, respectful, and positive work environment complying with your responsibilities under the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023.

## 2. Definitions

**Equality Act 2010** – Protects job applicants, employees, workers, contractors and self-employed people against harassment in the workplace related to their “protected characteristic”.

**Sexual harassment** – Unwanted conduct of a sexual nature where this has the purpose or effect of violating an individual’s dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive working environment for that person. It is also unlawful to treat a person less favourably because they have either rejected or submitted to unwanted sexual conduct. This covers not just direct acts of sexual harassment but also indirect acts such as normalising sexualised conversations that can violate that person’s dignity.

**The Worker Protection (Amendment of Equality Act 2010) Act 2023** – Under this legislation employers now have a duty to take reasonable steps to prevent sexual harassment.

Under the Worker Protection Act 2023, anyone who witnesses sexual harassment or is made aware of it in the workplace and does not do anything about may result in a failure of this legal duty. A subsequent tribunal taking account of such failures may also increase an award of up to 25% in such cases.

**The workplace** – Interpretation of this can be quite wide ranging. As well as School, it could also include a public space, home working, online activities or even visiting the home of a parent/pupil so long as it is connected in some

way to an employee's work. For example, the work Christmas party, a networking event or car sharing. It can also include social media, instant messenger, email or telephone conversations with work colleagues or activities relating to work.

### **3. Confidentiality**

Anything you discuss with a colleague about their personal circumstances or experiences should be treated as confidential unless agreed between both parties or if there is a safeguarding risk to them or others. It could be helpful to clarify with colleagues what they would like shared and how they would prefer to be supported.

### **4. Preventing Sexual Harassment**

Actions school can take to mitigate against such risk as part of this "preventative duty" will include:

- Completing regular risk assessments to identify risk and implement any actions identified (see Appendix A)
- Undertake regular training for colleagues on sexual harassment and expectations of school.
- Remind colleagues of relevant school policies such as "Dignity at Work" and the school "Code of Conduct" etc.
- Providing details of the appropriate colleagues to escalate concerns to where a colleague may have experienced, witnessed, or been informed about sexual harassment at work.

### **5. Dealing with a Sexual Harassment complaint**

This procedure can be found within the school's policy on Resolving Grievances at Work. School should ensure all staff are familiar with this procedure as well as the school's Dignity at Work Policy and Code of Conduct.

In some cases, colleagues may be able to take quick action which helps to stop the unwanted behaviour. In others, there may need to be further investigation and action under the school Disciplinary Policy and Procedure.

When considering any sexual harassment incident, it is important to consider the following:

1. Treat all complaints seriously.
2. Think very carefully about the way you should handle the complaint to make sure it is fair, sensitive and follows the correct procedure.
3. Keep the colleague who made the complaint informed on what to expect from the process.
4. Deal with the complaint as quickly as possible.
5. If the colleague has raised the complaint formally or after informal consultation, they feel it has not been addressed satisfactorily they should be directed to the school Grievance policy and procedure.
6. Do seek advice from your School HR Service Provider if you need further support or advice.

**Please note:** If you witness or become aware of sexual harassment that you believe is serious enough to be a safeguarding concern and the colleague affected does not wish to raise a concern formally, you should seek advice from your HR service provider.

## **6. External support and useful resources**

If you would like to learn more about sexual harassment in the workplace or wish to reach out to organisations that specialise in sexual harassment and support some useful external links are enclosed below:

- [Equality and Human Right Commission – Preventing sexual harassment at work](#)
- [Acas guidance on sexual harassment, including preventing and handling complaints](#)
- [Sexual harassment at work advice | Rights of Women](#)
- [Galop – the LGBT+ anti-abuse charity \(LGBT+ and sexual violence\)](#)
- [Rape Crisis England & Wales](#)
- [SurvivorsUK | We challenge the silence to support sexually abused men \(men and non-binary\)](#)
- [Specialist helplines and support – Sexual harassment – Acas](#)  
[Sexual harassment – Victim Support](#)

## **Appendix A: Preventing Sexual Harassment Risk Assessment Template**

When completing a risk assessment of this nature, it is important to involve colleagues in the review process.

### The Risk Management Model for Sexual Harassment

The four-step model detailed below, provides you with the key guidance you will need to consider when completing your risk assessment.

To ensure your risk assessment is comprehensive we would recommend you consider each of the following areas:

- **Working environment** – There are certain factors within the school working environment that can put colleagues at greater risk of sexual harassment.
  - Do any of your roles involve lone working?
  - Do some colleagues have shift patterns that don't align with the school day, so they are more isolated?
  - Are there any secluded areas within school that could leave people more at risk?
  - Are colleagues required to attend external events or leave their main place of work for any reason?
  - Do colleagues interact with third parties, which could mean they were more at risk?
  - Do colleagues work with vulnerable people? What risks might be associated with this for both colleagues and the vulnerable people?
- **People** – Consider the characteristics of the people in these work environments and the vulnerabilities that those characteristics may present.
  - Are particular groups more at risk due to their working environment?
  - How diverse is your workforce?
  - Are any particular groups at higher risk of harassment due to a protected characteristic?
- **Outside Environments** – Include factors that are connected to environments outside of the usual working hours or main work location.
  - Do colleagues socialise outside of work?

- What activities do people tend to do while socialising?
- Are you aware of any social media or WhatsApp groups used by staff?
- Are these groups used of for work or social purposes?
- Are colleagues aware that comments or actions outside of work could still be in breach of school policies?
- **Management structures and reporting** – Include how aware colleagues are of reporting processes and how to use them. You could also consider:
  - How do the power dynamics operate within you school staffing structures?
  - Are structures in place to prevent abuses of power?
  - What is the culture in school around offensive 'jokes' or 'banter'?
  - Do staff feel able to challenge or report behaviour they find inappropriate?

### Preventing Sexual Harassment Risk Assessment

Risk rating		Likelihood of occurrence		
		Probable	Possible	Remote
Likely impact	Major: Causes major physical injury, harm or ill health.	High (H)	H	Medium (M)
	Severe: Causes physical injury or illness requiring first aid.	H	M	Low (L)
	Minor: Causes physical or emotional discomfort.	M	L	L

Identifying workplace sexual harassment risks	Assessing risks (How people might be harmed)	Initial rating (L,M,H)	Existing Control Measures	Final Rating (L,M,H)	Additional Action Required (Including due date and by whom)
<b>Working environment</b> Lone workers (caretaker, school manager) at risk due to being isolated outside of school working hours	Members of staff who work alone on site maybe more at risk of unwanted inappropriate behaviours from visiting workers, delivery drivers etc.	M	<ul style="list-style-type: none"> <li>Provide lone workers with a contact for when they are lone working</li> <li>Provide lone works with specific support to understand their own vulnerabilities and how to keep themselves safe when lone working</li> </ul>	L	Brief E Reed and D Johnson – direct to the shared drive for polices. Ensure mobile is used to inform of lone working start and end times.

			(including being in regular contact with their line manager via mobile phone) <ul style="list-style-type: none"> <li>• Ensure they are aware of the reporting procedures if they suffer any sexual harassment</li> </ul>		
<b>People</b> Women are more at risk due to their sex (Office for National Statistics)	Members of staff who are women are more at risk of sexual harassment from other users of the school site.	M	Brief all staff on the location of the policies and procedure for reporting and dealing with sexual harassment and the related policies: <ul style="list-style-type: none"> <li>• Resolving Grievance at Work</li> <li>• Dignity at Work</li> <li>• Whistle Blowing</li> <li>• Low Level Concerns</li> <li>• Disciplinary</li> <li>• Staff Code of Conduct</li> </ul>	L	Brief and Sexual Harassment Policy and \risk Assessment shared with all staff at safeguarding briefing 2.2.26 (shared school360 drive)
Children are more at risk due to their immaturity	Children could be at risk from sexual harassment from other	H	The PSHE curriculum has a strong 'healthy relationships'	L	NSPCC assembly Pupil questionnaire



and developmental levels	children or adults working with them		<p>element teaching children about respect and consent. Children have presentation by NSPCC to help them understand who to report any worries they have - related policies:</p> <ul style="list-style-type: none"> <li>• Child Protection &amp; Safeguarding</li> <li>• PSHE school curriculum</li> <li>• Visitors to School Policy</li> </ul>		
<p><b>Outside Environments</b></p> <p>Staff socialising outside of school hours may increase the risk of inappropriate behaviours and/or unwanted sexual harassment between staff members or staff members and the general public</p>	Staff and members of the general public are at risk of sexual harassment outside of the work place e.g. due to alcohol consumption, less formal setting etc. resulting in increased risk of individual's inappropriate conduct towards other	M	<p>Reiterate the duty of staff to comply with the following policies and what to do if they are a victim of sexual harassment</p> <ul style="list-style-type: none"> <li>• Resolving Grievances at Work</li> <li>• Social Networking policy</li> <li>• Dignity at Work</li> <li>• Code of Conduct</li> <li>• Whistle Blowing</li> <li>• Low level concerns</li> </ul>	L	Brief and Sexual Harassment Policy and \risk Assessment shared with all staff at safeguarding briefing 2.2.26 (shared school360 drive)

	members of staff or members of the general public.				
Staff who have been directed to work off-site e.g. other schools, County Hall at risk of sexual harassment in other settings by members of staff or the general public.	Staff feel less safe working at other sites and are unsure about procedures to share concerns if they encounter sexual harassment.	M	Reiterate that staff are protected by this procedure and related policies whenever they are working off-site (on school business, as directed) and the procedures for sharing concerns/incidents are the same as the on-site procedures.	L	Brief and Sexual Harassment Policy and \ risk Assessment shared with all staff at safeguarding briefing 2.2.26 (shared school360 drive)
Social networking groups such as WhatsApp pose a risk of inappropriate messages between individuals or groups of staff	Staff members could be at risk of sexual harassment from other staff members via text messaging, social networking etc	M	Reiterate the duty of staff to comply with the following policies and what to do if they are a victim of sexual harassment <ul style="list-style-type: none"> <li>• Social Networking policy</li> <li>• Resolving Grievance at Work</li> <li>• Dignity at Work</li> <li>• Code of Conduct</li> <li>• Whistle Blowing</li> <li>• Low level concerns</li> </ul>	L	Reiterate the contents of the social networking policy and the staff code of conduct regarding social media groups and sharing of information between individuals and groups using social media

					platforms/APPS. Reiterate the location of all related documentation
<b>Management structures and reporting</b> Risk of staff not reporting any sexual harassment due to not being aware of how to report such behaviours/incidents.	Staff may be subjected to sexual harassment and be unable to report the harassment increasing the severity and number of incidents.	M	Reiterate the importance of understanding the contents of the following policies to report without fear or prejudice: <ul style="list-style-type: none"> <li>Resolving Grievance at Work</li> <li>Dignity at Work</li> <li>Code of Conduct</li> <li>Whistle Blowing</li> <li>Low level concerns</li> </ul>	L	Brief and Sexual Harassment Policy and Risk Assessment shared with all staff at safeguarding briefing 2.2.26


### Preventative Action

	List below in priority order the actions identified to mitigate risk of sexual harassment
1	Brief E Reed and D Johnson – direct to the shared drive for polices. Ensure mobile is used to inform of lone working start and end times.

	Add Code of Conduct and Sexual harassment Policy to Contractors Induction Pack
2	Briefing- Sexual Harassment Policy and Risk Assessment shared with all staff at safeguarding briefing 2.2.26 Reiterate the contents of the social networking policy and the staff code of conduct regarding social media groups and sharing of information between individuals and groups using social media platforms/APPS. Reiterate the location of all related documentation (shared school360 drive) Reiterate that the protections and procedures remain the same whether working on-site or off-site.
3	Sexual Harassment Policy added to Contractors Pack

### Risk Assessment Sign Off

I consider the risk assessment to be suitable and sufficient to control the risks to the prevention of sexual harassment at work for colleagues within school.

Headteacher:		Date:	26.1.26	Date of review:	Spring 2027
Chair of Govs:	Angela Hall	Date:	2.2.26	Date of review:	Spring 2027

### Appendix B – Examples

Example	What do you do?
You conduct a risk assessment for preventing sexual harassment and identify that the facilities staff	<ul style="list-style-type: none"> <li>Approach the relevant staff members and have an open discussion about the risk assessment, seeking their views on any additional action that may be required</li> </ul>

<p>(cleaners/caretakers) are at an increased risk of sexual harassment when working in the evening, as there are fewer people around, and third parties may be present for school lettings</p>	<ul style="list-style-type: none"> <li>• Review safety measures already in place such as CCTV, use of radios for contact between colleagues. Make sure staff are able to contact a colleague at all times when working alone.</li> <li>• Ensure any third-party organisations involved in lettings are aware of policies and procedures relating to sexual harassment as part of lettings agreements</li> <li>• Conduct regular check-ins with those working in the evening, and conduct lone working risk assessments where required</li> <li>• Provide comprehensive training to staff on recognising and reporting sexual harassment, bystander intervention and the consequences of sexual harassment.</li> </ul>
<p>School staff are hosting a work Christmas party in a function room at the local pub. One of the team has had a few pints and is going up to some of their colleagues and hugging and kissing them. You notice that some of them are feeling uncomfortable around the person and are starting to actively avoid them.</p>	<ul style="list-style-type: none"> <li>• Assess the situation to see if it is safe and confirm your perception of the situation with the staff affected.</li> <li>• Approach the drunk colleague and suggest that they may want to go home. Make sure that they can safely get back to their home.</li> <li>• Arrange to speak to them when you are back at work and explain that their behaviour was inappropriate and how it made their teammates feel. Explain that it could not happen at another work event – at their work base or outside.</li> <li>• Speak to the people who were affected by the behaviour. Explain how you have dealt with the issue and ask if they are satisfied with that outcome.</li> </ul>
<p>A member of staff reports that a colleague has been sending a message to a WhatsApp group including other colleagues that are derogatory about</p>	<ul style="list-style-type: none"> <li>• Investigate the content of the messages.</li> <li>• Remind all colleagues of the social media policy and that all WhatsApp groups they must abide by Our Code of Conduct.</li> </ul>

<p>women. Other people in the group see it as harmless jokes but a couple think it is not appropriate.</p>	<ul style="list-style-type: none"> <li>• Explain why sexist jokes are offensive and harmful and should not be shared with colleagues in any format.</li> <li>• Continue to monitor if there are any changes in behaviour.</li> <li>• Speak to the people who were affected by the behaviour. Explain how you have dealt with the issue and ask if they are satisfied with that outcome.</li> </ul>
<p>Another member of the SLT is working late in school with a colleague and makes an unwanted sexual advance towards them. You find out by accident after hearing a staff member talking about it.</p>	<ul style="list-style-type: none"> <li>• If you hear this, you have a responsibility to respond to this – do not wait for a grievance to be raised.</li> <li>• Ask to speak to the person who experienced the unwanted sexual advance and ask them if there is anything they wish to raise. Explain that you have heard something concerning and you want to offer them support.</li> <li>• If necessary, investigate the issue that has been raised. Follow the guidance in the Disciplinary Procedure if there is evidence to suggest that an inappropriate incident took place. Offer the colleague support and signposting to wellbeing support if they require it.</li> </ul>