

# Sexual Harassment Risk Assessment and Action Plan

## Clarity Independent School

**Date of assessment:** May 2026 (and into July 2026 due to lengthy case example used to inform assessment and practice)

**Assessed by:** D. Hanson, Headteacher (Employer)

**Next review date:** May / June 2027

## Purpose of This Risk Assessment

This risk assessment identifies situations and environments where sexual harassment of staff may be more likely to occur and sets out the reasonable steps we will take to prevent it.

**Sexual harassment is defined as:** Unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

As an employer, we have a legal duty to take **all reasonable steps** to prevent sexual harassment of our staff, including harassment by third parties (pupils, parents/carers, visitors, contractors, governors/trustees, volunteers).

## This risk assessment focuses on these key areas:

- Physical environments and situations where harassment may be more likely
- Communication channels and practices
- Power dynamics and relationships
- Third-party interactions
- Reporting mechanisms and support systems

## This risk assessment is linked to our Dignity at Work Procedures as follows:

- Ethos, vision and mission statement
- Staff Handbook - Staff Code of Conduct
- Staff and Pupil E-Safety and Acceptable Use Policy
- Equality and Diversity Policy
- Sexual Harassment Policy: Please see our reporting procedures in more detail here (Staff Handbook)
- Personal Harassment Policy: Please see our reporting procedures in more detail here (Staff Handbook)
- The policies above make up our

### **Further policies linked to this risk assessment:**

- Mental Health and Wellbeing Policy
- Whistleblowing Policy
- Safeguarding / Child Protection Policy
- Safer Recruitment Policy
- E-safety and Acceptable use of ICT Policy
- Home School Communication Policy
- Photo Media and CCTV Policy
- Child on Child Harmful Sexual Behaviour Policy
- Anti-bullying Policy
- Complaints Policy
- Data Protection Policy

### **Sexual Harassment Training Materials:**

- Educare Online Course: Bullying and Harassment in the Workplace (1 hour)
- Headteacher in person training April INSET annually
- Policy renewals – Staff Handbook (Sept), Staff Code of Conduct and Communications Policy (July INSET)
- At appropriate stages of Employment Rights Act updates (e.g. next will be during April 2026 INSET for ERA25)
- The Key for Leaders – materials used for dynamic training opportunities for specific discussion of scenarios
- Peninsula Bright-HR – materials used for dynamic training opportunities for specific discussion of scenarios

## Section 1: Physical Environment Risks

### Risk Area 1.1: Small, Enclosed Spaces with Limited Visibility

| Examples in our school:                                                                                                                                                                                                                                                                                                                                         | Potential risks:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Additional actions needed:                                                                                                                                  |
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| <ul style="list-style-type: none"> <li>• Exam cupboard/secure storage areas</li> <li>• Store cupboards</li> <li>• Small offices</li> <li>• Therapy rooms</li> <li>• Sensory rooms</li> <li>• Staff / pupil toilets</li> <li>• Corridor between HT and SENDCO office is not covered by CCTV</li> <li>• Lobby area of meeting room not covered by CCTV</li> </ul> | <ul style="list-style-type: none"> <li>• Staff working alone together in confined spaces</li> <li>• Out of hours working of staff</li> <li>• Limited visibility from outside and no CCTV to keep workers in view</li> <li>• Opportunity for inappropriate behaviour</li> <li>• Difficulty for staff to exit if uncomfortable</li> <li>• Allegations difficult to investigate without witnesses</li> <li>• CCTV cameras positioned outside key areas (where appropriate and compliant with exam regulations) – meeting room and corridor offer v limited risk due to passing through quickly - monitor</li> </ul> | <ul style="list-style-type: none"> <li>• Windows in doors where possible and appropriate</li> <li>• Staff workstations positioned near high-risk areas</li> <li>• Procedures requiring doors to remain open where possible</li> <li>• Two-person tasks completed in high-traffic areas during busy times</li> <li>• Time limits for tasks in confined spaces</li> <li>• Clear protocols for entering confined spaces (e.g., verbal consent, positioning near exit) *See Appendix 3</li> <li>• Regular rotation of staff required to work in these areas</li> <li>• Allocation of staff with <i>balanced</i> roles in high-risk low-visibility areas where possible</li> </ul> | <ul style="list-style-type: none"> <li>• Create alternative arrangements where possible (e.g., larger spaces, additional staff present) REVIEWED</li> </ul> |

### Risk Area 1.2: Areas with Limited Supervision or Foot Traffic

| Examples in our school:                                                                                                                                   | Potential risks:                                                                                                                    | Control measures in place:                                                                                                                                                                                                                                     | Additional actions needed:                                                                                                   |
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| <ul style="list-style-type: none"> <li>• Corridors during lesson time</li> <li>• Outdoor areas/playgrounds when not in use</li> <li>• Car park</li> </ul> | <ul style="list-style-type: none"> <li>• Reduced natural surveillance</li> <li>• Opportunity for inappropriate behaviour</li> </ul> | <ul style="list-style-type: none"> <li>• Staff encouraged to work in pairs during quiet times</li> <li>• Clear procedures for opening/closing the building</li> <li>• Adequate lighting in all areas</li> <li>• Regular staff presence in key areas</li> </ul> | <ul style="list-style-type: none"> <li>• Create clear protocols for staff working outside normal hours</li> <li>•</li> </ul> |

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| <ul style="list-style-type: none"> <li>• Staff room when only 2 people present</li> <li>• Areas during early morning/late evening</li> <li>• Risk of third party harassment</li> </ul> | <ul style="list-style-type: none"> <li>• Staff / pupils feeling isolated or vulnerable</li> <li>• Difficulty getting help if needed</li> <li>• Out of hours working of staff</li> </ul> | <ul style="list-style-type: none"> <li>• Buddy system for early/late working and use of separate working area for each when two staff in building alone</li> <li>• Staff awareness of CCTV in all areas of school</li> <li>• Improved lighting on driveway</li> <li>• Staff keep mobile phone with them at all times when lone working (3<sup>rd</sup> party risk) or two staff working alone</li> </ul> |  |
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### Risk Area 1.3: Off-Site Activities and Trips

| Examples in our school:                                                                                                                                                                                                                                                                                                                             | Potential risks:                                                                                                                                                                                                                                                                                                                                       | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                   | Additional actions needed:                                           |
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| <ul style="list-style-type: none"> <li>• Educational visits</li> <li>• Swimming sessions at external facilities</li> <li>• Sports activities at external venues</li> <li>• Residential trips</li> <li>• Community visits</li> <li>• Attendance at staff events outside the usual working environment</li> <li>• Socialising outside work</li> </ul> | <ul style="list-style-type: none"> <li>• Less structured environment</li> <li>• Changing facilities</li> <li>• Overnight accommodation</li> <li>• Transport arrangements</li> <li>• Reduced supervision from senior leaders</li> <li>• Out of hours working of staff</li> <li>• Effect of alcoholic beverages when socialising outside work</li> </ul> | <ul style="list-style-type: none"> <li>• Risk assessments completed for all trips and include staff safety</li> <li>• Clear staff:pupil ratios maintained</li> <li>• Separate sleeping/changing arrangements</li> <li>• Code of conduct and communication policy applies on all trips</li> <li>• Clear reporting procedures for concerns</li> <li>• Senior leader approval required for all trips</li> </ul> | <ul style="list-style-type: none"> <li>• Feedback welcome</li> </ul> |

## Section 2: Communication and Technology Risks

### Risk Area 2.1: Personal Phones and Messaging Apps

| Examples in our school: | Potential risks: | Control measures in place: | Additional actions needed: |
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| <ul style="list-style-type: none"> <li>• Staff Whatsapp group as whole staff team</li> <li>• Whatsap-ping and Texting individuals</li> <li>• Photos of staff – taking / sharing</li> </ul> | <ul style="list-style-type: none"> <li>• Blurred boundaries between professional and personal communication</li> <li>• Miscommunications and misunderstandings</li> <li>• Messages sent outside working hours – inconvenience / interruption</li> <li>• Use of informal language, emojis, kisses (xx), hugs</li> <li>• Expectations of conduct in private one-to-one staff conversations can be ambiguous</li> <li>• Difficulty monitoring or investigating concerns</li> <li>• Staff feeling pressured to respond outside working hours</li> <li>• Staff feeling pressured to respond</li> <li>• Misinterpretation of tone or intent</li> <li>• Out of hours working of staff</li> </ul> | <ul style="list-style-type: none"> <li>• Clear staff code of conduct and communications policy includes guidance on appropriate communication (kisses (xx), heart emoji)</li> <li>• Work email and Teams/work phones are approved platforms are primary communication methods</li> <li>• Staff Conduct and Comms Policy sets out expectations for professional communication and work / home boundaries / obligations to respond</li> <li>• Personal phone numbers not routinely shared</li> <li>• Staff WhatsApp group has guidelines on intended use, opt in / out and clear boundaries</li> <li>• Staff put boundaries in place with each other, and raise concerns to HT informally (or using grievance procedures) if further support needed</li> <li>• Staff can silence / ignore, or delay reading / responding till next day / working hours</li> </ul> | <ul style="list-style-type: none"> <li>• Monitor and review</li> </ul>                                                          |
| <ul style="list-style-type: none"> <li>• Social media and online interactions</li> </ul>                                                                                                   | <ul style="list-style-type: none"> <li>• Staff connecting on personal social media accounts</li> <li>• Inappropriate comments or messages</li> <li>• Sharing of personal information</li> <li>• Blurred professional boundaries</li> <li>• Out of hours working of staff</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>• Staff code of conduct and communications policy includes social media guidance</li> <li>• Staff advised not to connect with colleagues on personal social media</li> <li>• Clear guidance on professional online presence</li> <li>• Social media checks completed as part of recruitment to identify and prevent more risky online behaviour entering the team</li> <li>• Staff raise grievance informally to HT / formally if necessary.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• Provide annual refresher training of SH from accredited provider</li> <li>•</li> </ul> |

#### Risk Area 2.2: Email Communication

| Examples in our school: | Potential risks: | Control measures in place: | Additional actions needed: |
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| <ul style="list-style-type: none"> <li>• Inappropriate content or tone for work matters</li> <li>• Overly familiar language</li> <li>• Use of personal email addresses</li> <li>• Messages sent outside working hours</li> <li>•</li> </ul> | <ul style="list-style-type: none"> <li>• Blurred boundaries between professional and personal communication</li> <li>• Private one-to-one conversations</li> <li>• Misinterpretation of tone or intent</li> <li>• Messages sent outside working hours</li> <li>• Staff feeling pressured to respond outside working hours</li> <li>• Out of hours working of staff</li> <li>• Use of informal language, emojis, kisses (xx), hugs</li> </ul> | <ul style="list-style-type: none"> <li>• Email signature standards in place</li> <li>• IT acceptable use policy covers appropriate email use and appropriate language boundaries</li> <li>• Work email accounts provided to all staff</li> <li>• Staff not permitted to use personal accounts for work matters and vice versa</li> <li>• Staff advised no expectation to read / action emails outside working hours</li> <li>•</li> </ul> | <ul style="list-style-type: none"> <li>• Remove use of heart emojis and overly familiar sign-offs from work emails</li> <li>• Remove use of heart, shock, laugh and cry emoji reactions to emails</li> </ul> |
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### Section 3: Power Dynamics and Relationships

#### Risk Area 3.1: Senior Staff and Junior Staff Interactions

| Examples in our school:                                                                                                                                                                                  | Potential risks:                                                                                                                                                                                                                                                                                                                                                 | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Additional actions needed:                                                                                                                                                                                                                                                                                            |
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| <p>Senior member of staff working alongside more junior member</p> <p>Permanent, full-time member of staff working alongside someone on a temporary contract, part time, or on induction / probation</p> | <ul style="list-style-type: none"> <li>• Power imbalance may prevent junior staff from reporting concerns</li> <li>• Junior staff may feel unable to refuse requests or set boundaries</li> <li>• Senior staff may not recognise impact of their behaviour</li> <li>• Fear of negative consequences (e.g., poor references, dismissal, reduced hours)</li> </ul> | <ul style="list-style-type: none"> <li>• Clear reporting procedures with multiple routes to raise concerns</li> <li>• Young workers – mentor</li> <li>• Young / junior staff empowered through role modelling and encouragement (briefings)</li> <li>• Whistleblowing policy in place and update in May annually</li> <li>• Regular supervision and check-ins generally</li> <li>• IRA (and IHCP where necessary) and termly Health Ques. – provide frequent check ins prompting raising concerns at low level</li> <li>• All staff trained on professional boundaries</li> </ul> | <ul style="list-style-type: none"> <li>• Provide specific training for senior leaders on power dynamics and appropriate behaviour</li> <li>• Include power dynamics in all harassment training</li> <li>• Include clearer statement (Importance, listening and how to report) in staff induction procedure</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>• Out of hours working</li> <li>• Work experience</li> </ul> | <ul style="list-style-type: none"> <li>• Anonymous feedback mechanisms available (staff surveys and voice box)</li> <li>• Risk assess to reduce need for imbalanced workers together closely especially out of hours / alone</li> </ul> |  |
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### Risk Area 3.2: Line Management Relationships

| Examples in our school:                                                                                                                                                                                                                                                                                                                                                                                                                       | Potential risks:                                                                                                                                                                                                                                                                           | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Additional actions needed:                                                                                                                                                                                                                     |
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| <p>Headteacher is the only employer and manages all employment matters</p> <p><b>Other line management-type relationships:</b></p> <ul style="list-style-type: none"> <li>• Senior leaders</li> <li>• DSL/ DDSL</li> <li>• Exams Officer</li> <li>• Curriculum lead</li> <li>• Behaviour lead</li> <li>• Attendance lead</li> <li>• SENDCO</li> <li>• Business Manager</li> <li>• Class teachers</li> <li>• More experienced HLTAs</li> </ul> | <ul style="list-style-type: none"> <li>• One-to-one meetings in private</li> <li>• Performance management discussions</li> <li>• Appraisals and reviews</li> <li>• Dependency on line manager for career progression</li> <li>• Out of hours working</li> <li>• Work experience</li> </ul> | <ul style="list-style-type: none"> <li>• Supervision meetings scheduled regularly</li> <li>• Training for line managers on professional boundaries</li> <li>• Meeting room doors have windows and CCTV</li> <li>• Clear agendas for all PM meetings</li> <li>• Notes taken and shared</li> <li>• HR policies cover appropriate conduct</li> <li>• Good practice ('Crucial Conversations' by Patterson, Grenny et al)</li> <li>• Offer colleague to accompany where it is felt employee might be anxious about meeting</li> <li>• Open, listening culture across workplace (modelled by leaders)</li> </ul> | <ul style="list-style-type: none"> <li>• Ensure staff know they can request a different person present if uncomfortable</li> <li>• Include clearer statement (Importance, listening and how to report) in staff induction procedure</li> </ul> |

### Risk Area 3.3: Mentoring and Support Relationships

| Examples in our school:                                      | Potential risks:                                                                                    | Control measures in place:                                                                               | Additional actions needed:                                                                                                  |
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| <ul style="list-style-type: none"> <li>• As above</li> </ul> | <ul style="list-style-type: none"> <li>• Close working relationships may blur boundaries</li> </ul> | <ul style="list-style-type: none"> <li>• Clear terms of reference for mentoring relationships</li> </ul> | <ul style="list-style-type: none"> <li>• Clear process for changing mentor if relationship becomes uncomfortable</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>• Sharing of personal information</li> <li>• Emotional dependency</li> <li>• Meetings outside school</li> <li>• Work experience</li> </ul> | <ul style="list-style-type: none"> <li>• Regular review of mentoring arrangements</li> <li>• Supervision for mentors</li> <li>• Professional boundaries training</li> <li>• Regular check-ins with both mentor and mentee</li> </ul> | <ul style="list-style-type: none"> <li>• Develop clear guidelines for mentoring relationships</li> <li>• Ensure mentors receive specific training on maintaining boundaries</li> </ul> |
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#### Risk Area 3.4: Protected Characteristics

| Examples in our school:                                                                              | Potential risks:                                                                                                                                          | Control measures in place:                                                                                                                                                                | Additional actions needed:                                                                       |
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| <ul style="list-style-type: none"> <li>• Person with protected characteristic or multiple</li> </ul> | <ul style="list-style-type: none"> <li>• Disabled people, ethnic minorities and LGBT community are more likely to experience sexual harassment</li> </ul> | <ul style="list-style-type: none"> <li>• Equality policy (annual update)</li> <li>• Equality training (annual)</li> <li>• Monitoring opportunities through Equality Objectives</li> </ul> | <ul style="list-style-type: none"> <li>• To be identified following specific feedback</li> </ul> |

### Section 4: Third-Party Risks

#### Risk Area 4.1: Pupils (Particularly Secondary Age)

| Examples in our school:                                                                                                                                                                                  | Potential risks:                                                                                                                                                                                                                                                                                                                                                                                   | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Additional actions needed:                                                                                                                                                                                                                                                                                                 |
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| <ul style="list-style-type: none"> <li>• Contractors</li> <li>• Specialists / therapists</li> <li>• Parents / caregivers</li> <li>• Visitors</li> <li>• Volunteers</li> <li>• Work experience</li> </ul> | <ul style="list-style-type: none"> <li>• Sexual comments or gestures towards staff</li> <li>• Inappropriate touching</li> <li>• Sharing of sexual images</li> <li>• Online harassment</li> <li>• False allegations</li> </ul> <p><b>Specific SEND considerations:</b></p> <ul style="list-style-type: none"> <li>• Some pupils may have limited understanding of appropriate boundaries</li> </ul> | <ul style="list-style-type: none"> <li>• 'Before visiting our school' checklist - Conduct for visitors</li> <li>• Monitoring and observing visitors / contractors and staff not working alone with</li> </ul> <p><b>Specific SEND:</b></p> <ul style="list-style-type: none"> <li>• HS Behaviour policy addresses sexual harassment</li> <li>• PSHE curriculum covers appropriate relationships and boundaries and appropriate to pupils' needs and understanding</li> <li>• Sufficient supervision ratios in place (always at least 2 staff or 1 staff and one reliable pupil to accompany a pupil(s) with identified risk on their IRA)</li> <li>• Dash camera for journeys</li> </ul> | <ul style="list-style-type: none"> <li>• Add zero tolerance statement to 'Before visiting our school' checklist</li> <li>• Review behaviour policy to explicitly address sexual harassment of staff</li> <li>• Include clearer statement (Importance, listening and how to report) in staff induction procedure</li> </ul> |



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|  | <ul style="list-style-type: none"> <li>• Communication difficulties may make it harder for pupils to express themselves appropriately</li> <li>• Some pupils may have experienced trauma that affects their behaviour</li> <li>• Pupils with certain conditions may display sexually inappropriate behaviour</li> </ul> | <ul style="list-style-type: none"> <li>• Staff trained in managing challenging behaviour and RPIs</li> <li>• Change of face</li> <li>• Clear procedures for reporting pupil-on-staff incidents</li> <li>• Individual risk assessments and behaviour plans are in place for pupils with known sexually inappropriate behaviour</li> <li>• Safeguarding procedures and training on management of SH from pupils in place</li> <li>• Regular supervision for staff working with pupils who display challenging behaviour</li> <li>• Signage reminding all stakeholders that harassment of any kind is not tolerated</li> <li>• Stakeholders informed of zero tolerance policy through Home School Communication Policy and during Parent Induction Meeting when pupil first joins</li> </ul> |  |
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#### Risk Area 4.2: Parents and Carers, Contractors, Visitors, and Volunteers

| Examples in our school:                                                                                                                                                                                                                                                                                    | Potential risks:                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Additional actions needed:                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <ul style="list-style-type: none"> <li>• Visiting parents / carers (meetings)</li> <li>• Parents afternoons / evenings</li> <li>• Drop off / collection times</li> <li>• Phone calls / emails from parents / carers</li> <li>• Texts to parents</li> <li>• Teams meetings with parents / carers</li> </ul> | <ul style="list-style-type: none"> <li>• Inappropriate comments or behaviour</li> <li>• Requests for personal contact information</li> <li>• Invitations to social events</li> <li>• Excessive gifts or favours</li> <li>• Aggressive or threatening behaviour</li> <li>• Uncomfortable presence</li> <li>• Less familiar with school culture and expectations</li> <li>• May not have received safeguarding training</li> <li>• May work alone with staff</li> </ul> | <ul style="list-style-type: none"> <li>• Training and clear communication protocols with parents/carers</li> <li>• Staff advised not to share personal contact details</li> <li>• Meetings with parents/carers take place on school premises</li> <li>• Two staff present for difficult meetings</li> <li>• Procedures for managing and reporting aggressive behaviour</li> <li>• Agreement with staff regarding an acceptable value of accepted gifts</li> <li>• All visitors sign in and wear badges</li> <li>• Safeguarding information provided to all visitors</li> </ul> | <ul style="list-style-type: none"> <li>• Ensure reception staff know how to support colleagues experiencing harassment</li> <li>• Include guidance on parent/carer boundaries in staff handbook</li> <li>• Develop specific guidance for contractors and volunteers on appropriate behaviour</li> <li>• Include sexual harassment expectations in contractor agreements</li> <li>• Brief all visitors on expected professional conduct</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>• Short-term presence makes reporting less likely</li> <li>• Out of hours working of staff</li> </ul> | <ul style="list-style-type: none"> <li>• DBS checks for regular contractors and volunteers</li> <li>• Staff code of conduct shared with regular contractors</li> <li>• Supervision of visitors and contractors</li> </ul> | <ul style="list-style-type: none"> <li>• Ensure staff know they can report concerns about any third party</li> </ul> |
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## Section 5: Reporting, Response, and Support Systems for Staff

### Risk Area 5.1: Barriers to Reporting

| Examples:                                                                                                                                                        | Potential risks:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Additional actions needed:                                                                                                                                                                                                                                                                           |
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| <ul style="list-style-type: none"> <li>• Awareness of procedures</li> <li>• Fear</li> <li>• Cultural</li> <li>• History</li> <li>• Worry of detriment</li> </ul> | <ul style="list-style-type: none"> <li>• Staff don't know how to report</li> <li>• Fear of not being believed</li> <li>• Fear of retaliation or negative consequences</li> <li>• Concern about confidentiality</li> <li>• Worry about impact on working relationships</li> <li>• Cultural barriers (e.g., normalisation of certain behaviours)</li> <li>• Previous negative experiences of reporting</li> <li>• Worry about being treated negatively because of reporting / whistleblowing</li> </ul> | <ul style="list-style-type: none"> <li>• Multiple routes to report concerns (line manager, mentor, headteacher, external helpline)</li> <li>• Whistleblowing and Grievance policies protect staff who raise concerns</li> <li>• Confidentiality maintained (except where necessary)</li> <li>• Clear investigation procedures</li> <li>• Support offered to those making reports</li> <li>• Anonymous reporting option (voice box, staff surveys)</li> <li>• Access to external support (e.g., Employee Assistance Programme, union representatives)</li> </ul> | <ul style="list-style-type: none"> <li>• Provide further anonymous reporting option (e.g., CPOMS Staff-Safe)</li> <li>• Regularly communicate reporting routes to all staff</li> <li>• Include in all staff induction</li> <li>• Display reporting information prominently in staff areas</li> </ul> |

### Risk Area 5.2: Inadequate Response to Reports

| Examples in our school:                                                                      | Potential risks:                                                                                                                                           | Control measures in place:                                                                                                                                                                                                                                                                   | Additional actions needed:                                                                                             |
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| <ul style="list-style-type: none"> <li>• Admin time limitations of senior leaders</li> </ul> | <ul style="list-style-type: none"> <li>• Failure to respond to previous reports adequately, sets culture</li> <li>• Reports not taken seriously</li> </ul> | <ul style="list-style-type: none"> <li>• All leaders frequently reminded to report any sexual harassment reports to HT immediately no matter how low level</li> <li>• Clear investigation procedures in place</li> <li>• Trained investigators and use of external HR consultants</li> </ul> | <ul style="list-style-type: none"> <li>• Ensure investigations are trauma-informed and avoid victim-blaming</li> </ul> |

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|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <ul style="list-style-type: none"> <li>Inadequate knowledge / training</li> </ul> | <ul style="list-style-type: none"> <li>Victim-blaming responses</li> <li>Inadequate investigation</li> <li>No action taken</li> <li>Complainant suffers negative consequences</li> <li>Perpetrator not held accountable</li> </ul> | <ul style="list-style-type: none"> <li>Support offered to all parties</li> <li>Disciplinary procedures followed where appropriate</li> <li>Regular review of cases</li> <li>Create clear timescales for investigations</li> <li>No detriment to staff who report in good faith</li> <li>Appropriate disciplinary action taken where harassment is found</li> <li>Outcomes monitored to ensure consistency and fairness</li> <li>Support provided to complainants throughout process (e.g., counselling, adjustments)</li> </ul> |  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

### Risk Area 5.3: Lack of Awareness Among Staff

| Examples in our school:                                                                                                                                                                      | Potential risks:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Additional actions needed:                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>New staff</li> <li>Missed training</li> <li>Misunderstanding</li> <li>Staff's previous workplace culture transferring to Clarity</li> <li></li> </ul> | <ul style="list-style-type: none"> <li>Staff don't recognise sexual harassment</li> <li>Bystanders don't intervene</li> <li>Normalisation of inappropriate behaviour</li> <li>"Banter" culture</li> <li>Staff don't know their rights or responsibilities</li> <li>No clear accountability</li> <li>Policies not reviewed or updated</li> <li>"Banter" culture, tolerance of low-level inappropriate behaviour, sexualised jokes or comments, about appearance, unwanted physical contact (e.g., hugs, touching), sharing of sexual content</li> </ul> | <ul style="list-style-type: none"> <li>Staff code of conduct sets out expected behaviour and zero tolerance</li> <li>Examples discussed in daily briefings</li> <li>Safeguarding training includes staff-on-staff concerns</li> <li>Induction covers professional boundaries</li> <li>Annual policy updates and training</li> <li>Plan to implement SH specific training before April 26 (New Emp Rights Act 2025)</li> <li>Whistleblowing policy</li> <li>Disciplinary and grievance procedures</li> <li>Concerns addressed promptly</li> <li>Leaders model appropriate behaviour</li> <li>Culture where calling out inappropriate behaviour is supported</li> </ul> | <ul style="list-style-type: none"> <li>Create clear examples of what is/isn't acceptable behaviour</li> <li>Make training mandatory for all staff including support staff, <b>contractors</b></li> <li>Provide specific training on sexual harassment for all staff (including what it is, examples, how to respond)</li> <li>Include bystander intervention training</li> <li>Create dignity at work policy pack</li> <li>Include in performance management for senior leaders</li> </ul> |

### Risk Area 5.4: Inadequate Induction for New Staff

| Examples in our school: | Potential risks: | Control measures in place: | Additional actions needed: |
|-------------------------|------------------|----------------------------|----------------------------|
|                         |                  |                            |                            |

|                                                                                                   |                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                              |
|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• New staff</li> <li>• Work experience students</li> </ul> | <ul style="list-style-type: none"> <li>• New staff don't know expectations</li> <li>• Vulnerable to inappropriate behaviour from others</li> <li>• May not know how to report concerns</li> <li>• May bring inappropriate behaviours / expectations from previous workplaces</li> </ul> | <ul style="list-style-type: none"> <li>• Comprehensive induction programme with clear guidance on professional boundaries</li> <li>• Staff handbook provided</li> <li>• Safeguarding training</li> <li>• Code of conduct shared and signed</li> <li>• Probation period with regular reviews / check-ins creating space to ask about any concerns</li> <li>• Assign mentor or buddy for first term age-appropriate support</li> </ul> | <ul style="list-style-type: none"> <li>• Ensure induction explicitly covers sexual harassment and reporting procedures</li> <li>•</li> </ul> |
|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|

### Risk Area 5.5: Staff Wellbeing and Support

| Examples in our school:                                                                                                                                                                                                      | Potential risks:                                                                                                                                                                                                                                | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Additional actions needed:                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• New staff</li> <li>• Staff suffering with anxiety / mental ill-health</li> <li>• Staff suffering stress in / out of work</li> <li>• Staff with less support outside work</li> </ul> | <ul style="list-style-type: none"> <li>• Staff under stress may be more vulnerable</li> <li>• Mental health difficulties may affect judgement</li> <li>• Isolation and loneliness</li> <li>• Lack of peer support</li> <li>• Burnout</li> </ul> | <ul style="list-style-type: none"> <li>• Regular supervision</li> <li>• Staff wellbeing initiatives</li> <li>• Employee Assistance Programme and counselling</li> <li>• Occupational health support, Medicash services</li> <li>• Workload and stress level monitoring and management, staff surveys</li> <li>• Regular wellbeing check-ins for all staff, HQ, IRAs, IHCPs</li> <li>• Peer support networks</li> <li>• Culture of healthy work-life boundaries provided</li> <li>• Provide additional support for staff in high-stress roles</li> <li>• Thank you events funded by school during working salaried hours</li> <li>• Approx 10 term- time days not required to be in, to promote time to 'pay back in' / longer holidays / reast times</li> </ul> | <ul style="list-style-type: none"> <li>• Further feedback welcomed and implemented</li> </ul> |

## Section 6: Specific SEND Considerations

### Risk Area 6.1: Physical Care and Personal Care Tasks

| Examples in our school:                                                               | Potential risks:                                                                                       | Control measures in place:                                                                                                                                                                            | Additional actions needed:                                                                       |
|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Specific pupil(s) with SEND needs</li> </ul> | <ul style="list-style-type: none"> <li>• Intimate care tasks (toileting, changing, washing)</li> </ul> | <ul style="list-style-type: none"> <li>• Intimate care policy and procedures reviewed</li> <li>• Two-person care where possible</li> <li>• Same-gender care where possible and appropriate</li> </ul> | <ul style="list-style-type: none"> <li>• Ensure staff can report concerns about being</li> </ul> |

|                                                                                            |                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                       |
|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>making personal care difficult at school</li> </ul> | <ul style="list-style-type: none"> <li>Physical intervention and restraint</li> <li>Medical procedures</li> <li>Close physical proximity required</li> <li>Vulnerability of both staff and pupils</li> <li>Lone working of staff</li> </ul> | <ul style="list-style-type: none"> <li>Clear protocols for when care must be provided by opposite gender</li> <li>Clear recording of all incidents</li> <li>Positive handling training (e.g., Therapeutic Thinking) including boundaries</li> <li>Individual care plans for pupils</li> <li>Staff trained in appropriate touch</li> <li>Regular supervision</li> <li>Staff wellbeing and rotation of intimate care duties</li> </ul> | <ul style="list-style-type: none"> <li>asked to provide inappropriate care</li> </ul> |
|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|

### Risk Area 6.2: Therapeutic and Intervention Spaces

| Examples in our school:                                                                                                             | Potential risks:                                                                                                                                                                                                                                                           | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Additional actions needed:                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>Breakout rooms</li> <li>Admin overflow room (counselling)</li> <li>First aid room</li> </ul> | <ul style="list-style-type: none"> <li>One-to-one therapy sessions</li> <li>Sensory rooms</li> <li>Quiet spaces</li> <li>Emotional regulation support</li> <li>Physical contact during regulation activities</li> <li>First aid</li> <li>Lone working for staff</li> </ul> | <ul style="list-style-type: none"> <li>Therapy rooms have windows</li> <li>Staff to avoid working with pupil with door closed</li> <li>Sessions are scheduled and recorded</li> <li>Clear protocols for therapeutic interventions</li> <li>Regular supervision for therapists and support staff</li> <li>Clear protocols for physical contact during interventions</li> <li>Staff can raise concerns over interventions they're uncomfortable with for alternative circumstances</li> </ul> | <ul style="list-style-type: none"> <li>Ensure all therapy and intervention staff receive training on professional boundaries</li> </ul> |

### Risk Area 6.3: Challenging Behaviour and Physical Intervention

| Examples in our school:                                                       | Potential risks:                                                                                                                                                                                             | Control measures in place:                                                                                                                                                                                                                                                                                                                                                                                                                    | Additional actions needed:                                         |
|-------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>Specific pupils' SEND needs</li> </ul> | <ul style="list-style-type: none"> <li>Physical contact during restraint</li> <li>Heightened emotions</li> <li>Potential for injury</li> <li>Debrief sessions may involve close emotional support</li> </ul> | <ul style="list-style-type: none"> <li>Comfortable distance (ASD / SEMH pupils) training for all relevant staff</li> <li>Positive handling training for all relevant staff including maintaining professional boundaries</li> <li>Clear recording and reporting of all incidents</li> <li>Debrief procedures in place</li> <li>Risk assessments for pupils with challenging behaviour</li> <li>Team approach to managing behaviour</li> </ul> | <ul style="list-style-type: none"> <li>Feedback welcome</li> </ul> |

|  |                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                      |  |
|--|---------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|  | <ul style="list-style-type: none"> <li>• Staff working in high-stress situations</li> <li>• Staff working one to one</li> </ul> | <ul style="list-style-type: none"> <li>• Trauma-informed support provided for staff involved in incidents</li> <li>• Regular supervision for staff working with challenging behaviour</li> <li>• Staff wellbeing monitored and additional support provided where needed</li> <li>• Rotation of staff working with most challenging pupils</li> </ul> |  |
|--|---------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

#### Risk Area 6.4: Transport and Community Access

| Examples in our school:                                                                                                                               | Potential risks:                                                                                                                                                                                                                 | Control measures in place:                                                                                                                                                                                                                                                                                                                     | Additional actions needed:                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Transporting pupils to daytime activities</li> <li>• Taxis transporting pupils to and from school</li> </ul> | <ul style="list-style-type: none"> <li>• Staff and pupils in vehicles together</li> <li>• Community visits with small groups</li> <li>• Less structured environments</li> <li>• Reduced oversight from senior leaders</li> </ul> | <ul style="list-style-type: none"> <li>• Transport risk assessments</li> <li>• Clear protocols for vehicle use</li> <li>• Sign sheets for departure and arrival</li> <li>• Two staff / staff and 2 pupils on transport where possible</li> <li>• Community visit risk assessments</li> <li>• School mobile phones for communication</li> </ul> | <ul style="list-style-type: none"> <li>• Confirmation that taxi companies have performed all necessary safer recruitment procedures and will inform if later breached</li> </ul> |

#### Section 8: Monitoring and Review

| How we will monitor the effectiveness of these measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Key Performance Indicators:                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• IRAs, IHCPs, HQ termly</li> <li>• Regular supervision and check-ins with all staff</li> <li>• Annual staff survey including questions about safety and harassment</li> <li>• Anonymous feedback mechanisms</li> <li>• Regular review of all policies (at least annually)</li> <li>• Analysis of any reports or concerns raised</li> <li>• Exit interviews asking about workplace culture</li> <li>• Review of this risk assessment at least annually or after any incident</li> </ul> | <ul style="list-style-type: none"> <li>• Number of staff trained on sexual harassment awareness</li> <li>• Number of reports received and how they were handled</li> <li>• Staff survey results on feeling safe at work</li> <li>• Staff turnover rates related to perception of safety</li> <li>• Sickness absence related to stress/wellbeing</li> <li>• Compliance with policy review schedule</li> </ul> |

## Action Plan – Categories

### 1. Policy Updates

- Review all policies to explicitly address sexual harassment
- Add zero tolerance statement to 'Before visiting our school' checklist
- Review behaviour policy to explicitly address sexual harassment of staff
- Include sexual harassment expectations in contractor agreements
- Create dignity at work policy pack

### 2. Staff Training & Development

- Provide sexual harassment training to all staff (mandatory for all including support staff, contractors)
- Provide specific training on what sexual harassment is, examples of what is/isn't acceptable behaviour, and how to respond
- Include power dynamics in all harassment training
- Educare online SH course for senior leaders on power dynamics and appropriate behaviour
- Include bystander intervention training
- Ensure therapy and intervention staff receive training on professional boundaries
- Include in performance management for senior leaders

### 3. Induction & Onboarding

- Update induction programme to include specifics on sexual harassment, social media guidance
- Include clearer statement on importance, listening and how to report
- Ensure induction explicitly covers sexual harassment and reporting procedures
- Brief all visitors on expected professional conduct
- Develop specific guidance for contractors and volunteers on appropriate behaviour

### 4. Communication & Boundaries

- Develop clear communication policy (remove personal phones/WhatsApp for work)
- Include guidance on parent/carer boundaries in staff handbook
- Create clear protocols for staff working outside normal hours

### 5. Physical Environment & Supervision

- Review all small enclosed spaces and improve protocols
- Train staff on small space protocols

### 6. Reporting Mechanisms

- Create anonymous reporting mechanism
- Provide further anonymous reporting option (e.g., CPOMS Staff-Safe)
- Regularly communicate reporting routes to all staff
- Display reporting information prominently in staff areas
- Ensure staff know they can report concerns about any third party

- Ensure reception staff know how to support colleagues experiencing harassment

#### **7. Support & Wellbeing**

- Conduct staff wellbeing survey
- Ensure staff know they can request a different person present if uncomfortable
- Ensure staff can report concerns about being asked to provide inappropriate care

#### **8. Mentoring Relationships**

- Develop clear guidelines for mentoring relationships
- Ensure mentors receive specific training on maintaining boundaries
- Clear process for changing mentor if relationship becomes uncomfortable

#### **9. Investigation Procedures**

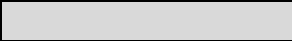
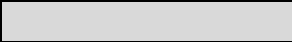
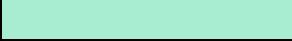
- Ensure investigations are trauma-informed and avoid victim-blaming

#### **10. Third-Party Management**

- Confirmation that taxi companies have performed all necessary safer recruitment procedures and will inform if later breached



## Appendix 1: Action Plan Timeline and Responsibilities AND PROGRESS AS OF END JULY 2026

| Further Actions                                                                                                                | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deadline      | Status (not started / in progress / complete) |    |   |
|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------------------------------------|----|---|
| Policy Updates                                                                                                                 |       |               | NS                                            | IP | C |
| Review all relevant policies to explicitly address sexual harassment                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                      | July 2026     |                                               |    |   |
| Create dignity at work policy pack                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                      | July 2026     |                                               |    |   |
| Reporting Mechanisms                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |                                               |    |   |
| Create anonymous reporting mechanism and share with staff (voice box / note under door)                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                      | July 2026     |                                               |    |   |
| Communication & Boundaries                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |                                               |    |   |
| Develop clear communication policy (remove personal phones/WhatsApp for work)                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                      | July 2026     |                                               |    |   |
| Include guidance on parent/carers boundaries in staff handbook / communication policy                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                      | July 2026     |                                               |    |   |
| Mandatory Training Roll-out                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |                                               |    |   |
| Review behaviour (+C on C SH) policy to explicitly address sexual harassment of staff by pupils                                |                                                                                                                                                                                                                                                                                                                                                                                                                                      | Sept INSET 26 |                                               |    |   |
| Add zero tolerance statement to 'Before visiting our school' checklist and put on website                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      | Sept INSET 26 |                                               |    |   |
| Refresh -> better zero tolerance statement (re culture for all stakeholders) in reception above sign in (get nice noticeboard) |                                                                                                                                                                                                                                                                                                                                                                                                                                      | Sept INSET 26 |                                               |    |   |
| Display SH reporting information (re staff / visitors) prominently in staff / visitor areas                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                      | Sept INSET 26 |                                               |    |   |
| Ensure reception staff know how to support colleagues experiencing harassment from parents / third parties                     |                                                                                                                                                                                                                                                                                                                                                                                                                                      | Sept INSET 26 |                                               |    |   |
| Regularly communicate reporting routes to all staff (termly minimum) (anonymous route)                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                      | Sept INSET 26 |                                               |    |   |
| Provide further anonymous reporting option (e.g., CPOMS Staff-Safe or G4Schools)                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                      | Sept INSET 26 |                                               |    |   |
| Provide sexual harassment training to all staff (what it is, examples, how to respond)                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                     | Sept INSET 26 |                                               |    |   |
| Include power dynamics in all harassment training                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                    | Sept INSET 26 |                                               |    |   |
| Educare online SH course for senior leaders on power dynamics and appropriate behaviour                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                    | Sept INSET 26 |                                               |    |   |
| Include bystander intervention training                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                    | Sept INSET 26 |                                               |    |   |
| Induction & Onboarding                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |                                               |    |   |
| Update induction programme to include specifics on sexual harassment, social media guidance                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                    | Sept INSET 26 |                                               |    |   |
| Include clearer statement on importance, listening and how to report                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                    | Sept INSET 26 |                                               |    |   |
| Ensure induction explicitly covers sexual harassment and reporting procedures                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                    | Sept INSET 26 |                                               |    |   |
| Physical Environment & Supervision                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |                                               |    |   |
| Review all small enclosed spaces and improve protocols                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                    | Oct ½ term 26 |                                               |    |   |

|                                                                                                                  |  |                |  |  |  |
|------------------------------------------------------------------------------------------------------------------|--|----------------|--|--|--|
| Train staff on small space protocols                                                                             |  | Oct ½ term 26  |  |  |  |
| Create clear protocols for staff working outside normal hours                                                    |  | Oct ½ term 26  |  |  |  |
| Include in performance management for senior leaders (bi-annual cycle)                                           |  | End Nov 26     |  |  |  |
| <b>Mentoring Relationships</b>                                                                                   |  |                |  |  |  |
| Develop clear guidelines for mentoring relationships                                                             |  | End Dec 26     |  |  |  |
| Ensure mentors receive specific training on maintaining boundaries                                               |  | End Dec 26     |  |  |  |
| Clear process for changing mentor if relationship becomes uncomfortable                                          |  | End Dec 26     |  |  |  |
| <b>Third-Party Management</b>                                                                                    |  |                |  |  |  |
| Include sexual harassment expectations in contractor agreements                                                  |  | End Dec 26     |  |  |  |
| Brief all visitors on expected professional conduct                                                              |  | End Dec 26     |  |  |  |
| Develop specific guidance for contractors and volunteers on appropriate behaviour                                |  | End Dec 26     |  |  |  |
| Confirmation that taxi companies have performed all necessary safer recruitment procedures                       |  | End Dec 26     |  |  |  |
| Ensure therapy and intervention staff receive training on professional boundaries                                |  | End Dec 26     |  |  |  |
| Regularly communicate reporting routes to all staff (termly minimum)                                             |  | Jan INSET 27   |  |  |  |
| <b>Investigation Procedures</b>                                                                                  |  |                |  |  |  |
| Ensure investigations are trauma-informed and avoid victim-blaming                                               |  | Feb ½ term 27  |  |  |  |
| Create clear examples of what is/isn't acceptable behaviour                                                      |  | Feb ½ term 27  |  |  |  |
| <b>Support &amp; Wellbeing</b>                                                                                   |  |                |  |  |  |
| Conduct staff wellbeing survey                                                                                   |  | Feb ½ term 27  |  |  |  |
| Ensure staff know they can request a different person present if uncomfortable at PM / support meetings with SLT |  | Feb ½ term 27  |  |  |  |
| Ensure staff can report concerns about being asked to provide inappropriate care                                 |  | Feb ½ term 27  |  |  |  |
| Ensure staff know they can report concerns about any third party                                                 |  | Feb ½ term 27  |  |  |  |
| <b>Performance Management</b>                                                                                    |  |                |  |  |  |
| Include in performance management for senior leaders (annual cycle)                                              |  | May 27         |  |  |  |
| Regularly communicate reporting routes to all staff (termly minimum)                                             |  | April INSET 27 |  |  |  |
|                                                                                                                  |  |                |  |  |  |

## Appendix 2: Frequently Asked Questions

### **Q: What if I'm not sure if it counts as harassment?**

A: If something has made you feel uncomfortable, undermined, or unsafe, it's worth reporting. We can help you work out what to do. You can speak to someone confidentially for advice before making a formal report.

### **Q: What if the person is more senior than me?**

A: The policy applies to everyone, including senior leaders. You can report concerns about anyone, regardless of their position. If the harassment is by your line manager or headteacher and you do not feel able to speak to them, use one of the alternative reporting routes (e.g., a colleague, mentor or anonymously).

### **Q: What if I'm worried about my job or career?**

A: We have a legal duty to protect you from victimisation. You will not lose your job, miss out on opportunities, or be treated unfairly for raising a concern following procedures, in good faith. If you experience any negative treatment after reporting, this is also a form of harassment and should be reported immediately.

### **Q: Will the person know I reported them?**

A: We will maintain confidentiality as far as possible, but in order to investigate properly, we may need to share some information. We will discuss this with you and will not share your identity without your knowledge. In some cases (e.g., if the matter goes to a formal hearing), it may not be possible to keep your identity completely confidential.

### **Q: What if other people are experiencing the same thing?**

A: Please still report it. Your report may help us identify a pattern of behaviour and protect others. We treat each report seriously and will investigate thoroughly.

### **Q: Can I bring someone with me to meetings?**

A: Yes. You have the right to be accompanied by a colleague (or trade union representative at some meetings). Let us know in advance who you'd like to bring.

### **Q: What if I don't want a formal investigation?**

A: That's okay. We can discuss informal options with you. However, if the harassment is serious or ongoing, we may need to investigate to protect you and others, even if you don't want us to. We will discuss this with you sensitively.

### **Q: How long will the investigation take?**

A: We aim to complete investigations as quickly as possible, and will usually meet with you within 5 working days to investigate the concern, then provide an outcome within 10 working days after that. Some complex cases may take longer, but we will explain why and keep you informed. See Personal / Sexual Harassment Policy (Staff Handbook) for more information.

### **Q: What if I'm not happy with the outcome?**

A: You have the right to appeal. We will explain the appeals process when we share the outcome with you. You can also seek external advice from ACAS or your trade union.

## **Remember: We Are Here to Help**

**Harassment is never acceptable. You deserve to feel safe and respected at work.**

**If you're experiencing harassment, please don't suffer in silence. Speak to someone today.**

## Appendix 3: Protocol for Using the Exam Cupboard: Safeguarding Staff

### Context

The exam cupboard was originally designed for single-person use to store exam papers securely. JCQ regulations now require a 'second pair of eyes check' before opening/dividing exam packs, necessitating two people in a space not designed for this purpose. Due to JCQ security requirements, the cupboard must remain windowless and cannot contain CCTV or recording devices.

### Physical Mitigations in Place

- **Location:** Central walkway in busy area with continuous foot traffic
- **Staffing:** 2-3 office workers positioned directly outside cupboard
- **CCTV:** Camera facing cupboard door captures external video and some internal sound (without capturing paper content - regulatory requirement)
- **Lighting:** Bright light operated from inside doorway (not outside) to prevent darkness
- **Door mechanism:** Can be always opened from inside - never locked when occupied

### Staffing Protocol

- **Role restriction:** Only SLT / Senior staff members perform second pair of eyes checks (or members of the same 'rank' where not possible)
- **Rotation:** This role alternates to prevent burden falling on one person
- **Balance:** Ensure appropriate staff role balance when pairing
- **Induction:** SLT and new staff members briefed on this protocol before they're asked to perform the role

### Procedural Safeguards

#### 1. Positioning Inside Cupboard

- Exams Officer stands near door hinges
- Accompanying person stands nearest door opening with handle at face height
- This ensures accompanying person can exit when desired

#### 2. Time Limit

- Target: Less than 2 minutes per check (or as close as possible)

#### 3. Consent Script (Initial Uses) Use for first several times until both parties confirm comfort with task:

**Before entering:** *"When we go into the cupboard, it is quite small in there and we have to close the door to complete the second pair of eyes check. Before we go in, are you happy to go in there with me?"*

**After consent, before closing door:** *"Now I need to close the door. Are you happy for that before I do? It will not be locked and you can exit at any time."*

**4. Discontinuing Script** Once staff member has performed role several times and indicated comfort, stop using script to prevent it raising alarm about intended misconduct.

**Staff Rights & Support**

- Any staff member can decline to perform this duty without explanation
- Staff can request a different person to accompany them
- Any concerns about the process should be reported immediately to Headteacher (or another SLT who will discretely alert HT)
- Staff can access anonymous reporting mechanisms if uncomfortable

**Documentation:** Keep a log of who performs checks together and when (stored securely, reviewed termly for patterns)

**Review**

This protocol will be reviewed annually or following any incident/concern.