



***** Primary Academy

Harassment and Bullying Policy

| | |
|------------------------|----------------------|
| Date of Policy | 2026 |
| Reviewed and Agreed by | The Directors' Board |
| Adopted on | Autumn 2024 |
| Reviewed on | May 2026 |
| Next Review Date | Autumn 2027 |

Contents:

Statement of intent

1. [Legal framework](#)
2. [What is harassment?](#)
3. [What is victimisation?](#)
4. [What is third party harassment?](#)
5. [What is bullying?](#)
6. [What you should do about it](#)
7. [Support and Protection](#)
8. [Record Keeping](#)
9. [Monitoring and Review](#)

Appendices

- a) [Risk Assessment](#)

Statement of intent

The Societas Trust ("The Trust") and ***** Primary Academy are committed to providing a working environment free from harassment and bullying, which includes sexual harassment, and ensuring all staff are treated, and treat others, with dignity and respect. This includes harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions or on social media.

It covers harassment and bullying by all staff employed by the Trust (which may include consultants, contractors and agency workers) and also by third parties such as clients, customers, suppliers or visitors to our premises.

We have carried out an assessment to assess the risk of different forms of harassment, including sexual harassment and third-party harassment, occurring in our workforce, including in different roles, the steps we could take to reduce those risks and which of those possible steps are reasonable. This risk assessment will be reviewed annually. The current assessment is available at Appendix 1.

1. Legal framework

Any disclosure that sexual harassment has occurred, is occurring, or is likely to occur may amount to a protected disclosure under the rules on whistleblowing if you reasonably believe the matter is in the public interest. Workers may raise concerns about sexual harassment under this policy or under our Confidential Reporting Policy.

This document is created following Employment Rights Act 2025 and The Worker Protection (Amendment of Equality Act 2010) Act 2023 coming into force on 26 October 2024 which creates a new duty for employers to take reasonable steps to prevent the sexual harassment of their employees.

This document has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The Employment Rights Act 2025
- The Worker Protection Act 2023
- The Equality Act 2010
- DfE (2023) 'Keeping children safe in education 2024'

This document operates in conjunction with the following Trust and school policies (Not exhaustive):

- Complaints Procedures
- Code of Conduct for Staff
- Code of Conduct for Parents and Carers
- Grievance Policy and Procedure
- Disciplinary Policy and Procedure
- Confidential Reporting Policy
- Investigation Procedure
- Formal Meetings Procedure
- Social Media Policy
- On-line Safety Policy
- Child Protection and Safeguarding Policy

2. What is harassment?

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

Unlawful harassment may involve **conduct**:

- **related to a protected characteristic** of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation;
- of a sexual nature (**sexual harassment**); or

- of **treating someone less favourably because they have submitted, or refused to submit to, sexual harassment or harassment related to sex or gender reassignment** e.g. where a manager gives a junior employee a poor performance review because they rejected the manager's sexual advances.

Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include (this is a non-exhaustive list), for example:

- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group, religion or belief, or gender;
- disclosing or threatening to disclose someone's sexual orientation or gender identity against their wishes;
- offensive e-mails, text messages or social media content; or
- mocking, mimicking or belittling a person's disability.

Sexual harassment does not need to be sexually motivated; it only needs to be sexual in nature and may include (this is a non-exhaustive list), for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- intrusive questions about a person's private or sex life or a person discussing their own sex life; or
- sending sexually explicit e-mails or text messages or sexual posts/contact on social media.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment; or sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

3. What is victimisation?

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

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

Victimisation may include (this is a non-exhaustive list), for example:

- Denying someone an opportunity because it is suspected that they intend to make a complaint about harassment/sexual harassment.

- b. Excluding someone because they have raised a grievance about harassment/sexual harassment.
- c. Failing to promote someone because they accompanied another staff member to a grievance meeting.
- d. Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.

Harassment/sexual harassment and victimisation are unlawful and will not be tolerated.

They may lead to disciplinary action up to and including dismissal without notice if they are committed:

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

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

If any harassment/sexual harassment or victimisation of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include updating relevant policies, providing further staff training and taking disciplinary action against the perpetrator.

4. What is third party harassment?

Third-party harassment occurs where a person is harassed/sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, derogatory comments about a person's age, disability, pregnancy, colour, religion or belief, sex or sexual orientation, or unwelcome sexual advances, from a client, customer or supplier visiting the employer's premises, or where a person is visiting a client, customer or supplier's premises or other location in the course of their employment.

Third-party harassment can result in legal liability and will not be tolerated. All staff are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy. Any harassment by a member of staff against a third-party may lead to disciplinary action up to and including dismissal.

5. What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include (this is a non-exhaustive list), for example:

- a. physical or psychological threats;
- b. overbearing and intimidating levels of supervision;
- c. inappropriate derogatory remarks about someone's performance.

However, legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

6. What you should do about it

If you are being harassed/sexually harassed/victimised/bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your line manager (or another manager where it concerns them) who can provide confidential advice and assistance in resolving the issue informally or formally. If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our **Grievance Policy and Procedure** and it will be dealt with under that procedure, taking into account the below.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform you of our decision. If we consider that there is a case to answer and the harasser or bully is an employee, the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. The outcome of our investigation may be put on hold while disciplinary action is taken. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

7. Support and Protection

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

We will review this policy annually and monitor its effectiveness. This will include monitoring the treatment and outcomes of any complaints of harassment, sexual harassment or victimisation we receive to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

We offer access to confidential employee support/counselling, which is available on request for anyone affected by, or accused of, harassment/sexual harassment or bullying. The helpline number is 01773 814400 and email address is nurse@uk-sas.co.uk. This is available 24/7.

Support and guidance can also be obtained from our workplace wellbeing champions and the following external services:

- a. The Equality Advisory and Support Service (www.equalityadvisoryservice.com).
- b. Protect (www.protect-advice.org.uk).

- c. Victim support (www.victimsupport.org.uk).
- d. Rights of women (England and Wales) (www.rightsofwomen.org.uk)

8. Record Keeping

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

9. Monitoring and review

This document will be reviewed on an annual basis by the Trust alongside the recognised Trade Unions and any changes made will be communicated to all staff.

The next scheduled review date for this document is autumn 2025.

The Societas Trust risk assessment for the prevention of sexual harassment

| | |
|---------------------------------|--------------------|
| Risk assessment owner: | The Societas Trust |
| Assessment date: | SEPT 2024 |
| Assessment carried out by: | AS ABOVE |
| Work location: | TRUST SETTINGS |
| Next scheduled assessment date: | SEPT 2025 |
| Version number | 1 |

Potential hazards, risks and proposed actions in prevention:

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--------------------------------------|-----|----|---|----------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| Workforce demographics: | | | | | | | | | |
| Is anyone required to work at night? | X | | 1. Third party harassment/ bullying. (contractors/public) whilst attending emergency call outs raised from security services that may require school staff on site. 2. Staff on residential educational visits - harassment from | SLT / PREMISES STAFF | | | | Security services/ police to be present. Very rare occasions likely. 2. SLT knowledge of staff experience and capabilities and regular training on how to report. Only use accredited residential providers. | Sept 2024 |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--|-----|----|--|--|---------------|-----|------|--|----------------|
| | | | | | Low | Med | High | | |
| | | | colleagues, 3 rd party harassment | | | | | | |
| Are there lone workers or people working in isolated workplaces? | x | | Third party harassment/ bullying. (contractors/public) | Premises staff – 3 rd party | | | | 1. Regular staff training and awareness of reporting. Lone working policy and risk assessments. | |
| Is there anyone who works with just one other employee/worker? | x | | Unidentified Peer bullying/ harassment | Admin staff Premises staff? | | | | Regular staff training, awareness of reporting and risk assessment. | |
| Do your employees/workers interact with third parties e.g. contractors or members of the public? | x | | Third party harassment/ bullying. (contractors/public) | 1. Premises – suppliers and contractors 2. Classroom staff – visits and visitors. 3. Admin – suppliers and contractors | | | | Regular staff training, awareness of reporting and risk assessment. Due Diligence of 3 rd party contractors prior to commencing work | |
| Do any of your employees/workers work alone with a third party? | x | | Third party harassment/ bullying. (contractors/public) | 1. Admin – suppliers and contractors 2. Premises – suppliers and contractors | | | | Regular staff training, awareness of reporting and risk assessment. Due Diligence of 3 rd party contractors/ companies prior to | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--|-----|----|--|---|---------------|-----|------|--|----------------|
| | | | | | Low | Med | High | | |
| | | | | 3. Classroom staff | | | | commencing work/project. | |
| Do you require your employees/workers to attend the workplace of a third party or attend offsite locations? | x | | Third party harassment/ bullying. (contractors/public) | <ol style="list-style-type: none"> 1. Classroom staff – CPD providers, other schools, ed visits. 2. Admin & premises – CPD , collect from suppliers | | | | <p>Regular staff training, awareness of reporting and risk assessment.</p> <p>Due Diligence of 3rd party contractors/ companies prior to commencing work/project.</p> <p>Staff contact details are kept up to date.</p> | |
| Are members of staff expected to socialise with third parties e.g. at events or conferences with contractors or clients? | x | | Third party harassment/ bullying. | SLT/ teachers – conferences / awards events | | | | <p>Regular staff training, awareness of reporting and risk assessment.</p> <p>Due Diligence of 3rd party contractors/ companies prior to commencing work/project.</p> <p>Staff contact details are kept up to date.</p> | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|--|---|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| Do employees/workers attend off site events? | x | | Third party harassment/ bullying. (contractors/public) | Classroom staff – CPD providers, other schools, ed visits. Admin & premises – CPD , collect from suppliers | | | | Regular staff training, awareness of reporting and risk assessment. Due Diligence of 3 rd party contractors/ companies prior to commencing work/ project. Staff contact details are kept up to date. | |
| Are there high pressured, competitive or stressful environments within your organisation? | | x | | | | | | | |
| Is there a higher representation of one gender in your workplace? | x | | The minority group may be subject to harassment and/or bullying. They may not feel confident in reporting any incidents of this nature. | All staff | | | | Rigorous safer recruitment and selection. Ongoing staff training and awareness and knowledge of reporting. Positive culture of the school and acceptance to whistleblow. Staff wellbeing survey's Clear line management of all staff. | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|--|---------------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| Are there areas of power imbalances in the workplace? | | x | Males in SLT roles in largely female workforce opportunity to use power to sexually harass or bully female or male workforce. Low numbers of male staff receiving harassment from majority female peers (ongoing staffroom 'banter' SLT females taking opportunity to use power to sexually harass or bully female or male workforce. | All staff | | | | Rigorous safer recruitment and selection. Ongoing staff training and awareness and knowledge of reporting. Positive culture of the school and acceptance to whistleblow. Staff wellbeing survey's Clear line management of all staff. | |
| Vulnerable employees and workers: | | | | | | | | | |
| Evidence shows that vulnerable employees and workers can be exposed to greater risk from harassment than those who are not. In this section, assess the risk of those groups that are relevant to your workplace: | | | | | | | | | |
| Women | X | | As above | | | | | As above | |
| LGBTQ+ | X | | Vulnerable employees may be subject to harassment and/or | Vulnerable employee/group | | | | Induction and ongoing CPD / line management Whistleblowing | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--|-----|----|---|---------------------------|---------------|-----|------|--|----------------|
| | | | | | Low | Med | High | | |
| | | | <p>bullying by peers/parents/public.</p> <p>They may not feel confident in reporting any incidents of this nature.</p> | | | | | <p>Regular training and awareness</p> <p>Positive values of the Trust shared regularly and demonstrated in everyday practice.</p> | |
| Young workers | X | | <p>Vulnerable employees may be subject to harassment and/or bullying by peers/parents/public.</p> <p>They may not feel confident in reporting any incidents of this nature.</p> | Vulnerable employee/group | | | | <p>Induction and ongoing CPD / line management</p> <p>Whistleblowing</p> <p>Regular training and awareness</p> <p>Positive values of the Trust shared regularly and demonstrated in everyday practice.</p> | |
| Someone with a disability (mental or physical) | X | | <p>Vulnerable employees may be subject to harassment and/or bullying by peers/parents/public.</p> <p>They may not feel confident in reporting any</p> | Vulnerable employee/group | | | | <p>Individual health and care plans</p> <p>Induction and ongoing CPD / line management</p> <p>Whistleblowing</p> <p>Regular training and awareness</p> | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|--|---------------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| | | | incidents of this nature. | | | | | Positive values of the Trust shared regularly and demonstrated in everyday practice. | |
| Black and minority ethnic workers | X | | Vulnerable employees may be subject to harassment and/or bullying by peers/parents/public. They may not feel confident in reporting any incidents of this nature. | Vulnerable employee/group | | | | Induction and ongoing CPD / line management Whistleblowing Regular training and awareness Positive values of the Trust shared regularly and demonstrated in everyday practice. | |
| Non-UK nationals, including those who may not be confident in making a complaint in English or that English is not their first language | x | | Vulnerable employees may be subject to harassment and/or bullying by peers/parents/public. They may not feel confident in reporting any incidents of this nature. | Vulnerable employee/group | | | | Induction and ongoing CPD / line management Whistleblowing Regular training and awareness Positive values of the Trust shared regularly and demonstrated in everyday practice. | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|----------------|-----|----|--|-----------------------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| Low paid | x | | Vulnerable employees may be subject to harassment and/or bullying by peers/ parents/public. They may not feel confident in reporting any incidents of this nature. May feel isolated and not able to report any concerns. | Part time staff, lower pay scales | | | | Clear and robust job descriptions and responsibilities, line management. Induction and ongoing CPD / line management Whistleblowing Regular training and awareness Positive values of the Trust shared regularly and demonstrated in everyday practice. | |
| Home workers | X | | May feel isolated and not able to report any concerns. | Home workers | | | | Induction and ongoing CPD / line management Whistleblowing Regular training and awareness Positive values of the Trust shared regularly and demonstrated in everyday practice. | |
| Lone workers | X | | See above for lone working | | | | | | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--|-----|----|--|---------------------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| Agency workers | X | | Not fully aware of Trust policies and values. They may think this type of behavior is acceptable and/or might not know how to report incidents of harassment and/or bullying. | Agency workers All staff | | | | Induction line management Whistleblowing Regular training and awareness Positive values of the Trust shared regularly and demonstrated in everyday practice. Due diligence of agencies used. | |
| Casual workers | X | | Not fully aware of Trust policies and values. They may think this type of behavior is acceptable and/or might not know how to report incidents of harassment and/or bullying. | Casual workers All staff | | | | Induction line management Whistleblowing Regular training and awareness Positive values of the Trust shared regularly and demonstrated in everyday practice. Due diligence of agencies used. | |
| Those on fixed term or zero-hour contracts | | X | | | | | | | |
| Policy: | | | | | | | | | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--|-----|----|--|---------------------|---------------|-----|------|--|----------------|
| | | | | | Low | Med | High | | |
| working, lone workers, Equality, Diversity and Inclusion? | | | | | | | | | |
| Training: | | | | | | | | | |
| Do you carry out equality, diversity and inclusion training that covers sexual harassment as part of the Induction/onboarding process? | x | | Staff lack of understanding of equality and diversity, specifically protected characteristics. | Staff | | | | <p>Policies shared and understood on induction, annually and Regular training and awareness</p> <p>Positive values of the Trust shared regularly and demonstrated in everyday practice</p> | |
| Do you carry out equality, diversity and inclusion training that covers sexual harassment on an annual basis? | X | | Staff lack of understanding of equality and diversity, specifically protected characteristics. | Staff | | | | <p>Policies shared and understood on induction, annually and Regular training and awareness</p> <p>Positive values of the Trust shared regularly and demonstrated in everyday practice</p> | |
| Do you provide separate training to line managers, to that which is given to | x | | Not fully understanding the risks to staff from | All staff | | | | As above and senior staff rigor to policy , implementation and ongoing monitoring | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|---|---------------------|---------------|-----|--|---------------------|----------------|
| | | | | | Low | Med | High | | |
| employees and workers? | | | harassment and/or bullying. This may lead to insufficient measures of support and reporting. | | | | | | |
| Do you provide EDI training that is specific to your workplace and that uses case studies or scenario's that relate to your organisation? | | X | | | | | Explore training and refresher training. | | |
| Do you provide refresher EDI training when circumstances warrant it? This could be: <ul style="list-style-type: none"> • There is a change in working arrangements • a change to the workforce demographics • receiving a complaint of sexual harassment | | X | Not fully understanding the risks to staff from harassment and/or bullying. This may lead to insufficient measures of support and reporting. | All staff | | | Explore training and refresher training. | | |
| Management structure: | | | | | | | | | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|--------------------|---------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| Is there a higher representation of one gender in the leadership team? | X | X | SETTING SPECIFIC - | SETTING SPECIFIC | X | X | X | <p>Clear and robust job descriptions and responsibilities, line management.</p> <p>Induction and ongoing CPD / line management Induction line management Whistleblowing Regular training and awareness</p> <p>Positive values of the Trust shared regularly and demonstrated in everyday practice. Staff wellbeing survey's Clear line management of all staff.</p> | |
| Are there areas of the business that have power imbalances? | | X | | | | | | | |
| Are there areas of the business where company policies aren't adhered to? | | X | | | | | | | |
| Is decision making concentrated - only a | | X | | | | | | | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|--------|---------------------|---------------|-----|------|--|----------------|
| | | | | | Low | Med | High | | |
| few individuals at the top of the business can make decisions? | | | | | | | | | |
| Is there a HR team, or access to an external HR Outsourcing provider? | X | | | | | | | | |
| Do leaders have individual authority over recruitment practices? | | X | | | | | | | |
| Do leaders have individual authority on pay decisions? | | X | | | | | | | |
| Working environment | | | | | | | | | |
| Do you have an IT policy that sets the rules for appropriate usage? | X | | | | | | | | |
| Do you monitor and address inappropriate behaviour on digital platforms? | X | | | | | | | Filter monitoring IT Online acceptable use policies and annual declarations Online safety training for all staff | |
| Are there sexualised or sexist materials on display such as calendars, posters? | | X | | | | | | | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--|-----|----|--|---------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| Is there adequate privacy or security for workers using bathrooms or changing rooms? | X | | | | | | | | |
| Do you have areas that are isolated or with inadequate lighting or security? | | X | | | | | | | |
| Are there different uniform requirements between genders, or prescriptive dress codes or expectations for either gender? | | X | | | | | | | |
| Are workers required to travel and have overnight stays? | X | | See above for staff attending conferences/ training In particular staff attending overseas events – 3 rd party harassment that is not perceived as bullying and harassment in another country. | Staff | | | | See above – contact details, know where they are staying, due diligence on the event Background research on culture of country visiting. Overseas visits via reputable organisation | |
| Do employees and workers travel to remote locations? | | X | | | | | | | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--|-----|----|---|---------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| Do you provide accommodation facilities for employees? | | X | | | | | | | |
| Are sexist jokes prevalent in the workplace? | | X | | | | | | Trust culture of not being funny. Trust values set understood and shared by all staff. | |
| Do workers engage with social drinking on site? | | X | | | | | | | |
| Do workers engage with social drinking off site? | X | | Through loss of inhibitions may result in potential harassment / bullying by other staff or 3 rd party public. | Staff Public | | | | staff code of conduct – expectation for responsible behaviour in and out of school (and online) | |
| Do you have high staff turnover, particularly of female, young workers, or low paid earners? | | X | | | | | | | |
| Have you been informed that some workers are more reluctant to work with certain workers | | X | | | | | | | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|---|---------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| or take on certain tasks? | | | | | | | | | |
| Is alcohol consumed, either by staff or third parties, whilst staff are working? | | X | | | | | | | |
| Outside of the workplace | | | | | | | | | |
| Do staff socialise outside of the workplace? | X | | Through loss of inhibitions may result in potential harassment / bullying by other staff or 3 rd party public. | Staff Public | | | | staff code of conduct – expectation for responsible behaviour in and out of school (and online) | |
| Is alcohol available at social events? | X | | Through loss of inhibitions may result in potential harassment / bullying by other staff or 3 rd party public. | Staff Public | | | | staff code of conduct – expectation for responsible behaviour in and out of school (and online) | |
| Do you undertake background or reference checks for all workers and other people engaged at your workplace such as contractors? | X | | Employing candidates/ contractors who have unsuitable personality characteristics or previous history of | Staff | | | | Induction and ongoing CPD / line management Clear and robust job descriptions and responsibilities, line management. | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|---|---------------------|---------------|-----|------|--|----------------|
| | | | | | Low | Med | High | | |
| | | | bullying or harassment | | | | | Rigorous safer recruitment and selection. Due diligence on contractors | |
| Do you issue employee communications in advance of workplace events? | X | X | SETTING SPECIFIC | SETTING SPECIFIC | X | X | X | SETTING SPECIFIC | |
| Complaint handling: | | | | | | | | | |
| Do you have clear and effective procedures for receiving and responding to complaints of sexual harassment? | X | | Staff wouldn't feel able or confident in reporting without a system that could lead to a culture of acceptable bullying and harassment. | Staff | | | | <p>Induction and ongoing CPD / line management Induction line management Whistleblowing Regular training and awareness</p> <p>Positive values of the Trust shared regularly and demonstrated in everyday practice.</p> <p>Clear and robust job descriptions and responsibilities, line management.</p> | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|--|-----|----|---|---------------------|---------------|-----|------|---|----------------|
| | | | | | Low | Med | High | | |
| | | | | | | | | Induction and ongoing CPD / line management | |
| Are there multiple, confidential ways for employees to report harassment? | X | | Staff wouldn't feel able or confident in reporting without a system that could lead to a culture of acceptable bullying and harassment. | Staff | | | | Induction and ongoing CPD / line management Clear and robust job descriptions and responsibilities, line management. Induction line management Whistleblowing Regular training and awareness Positive values of the Trust shared regularly and demonstrated in everyday practice. | |
| Are your workers able to access management who are outside of their direct reporting line? | X | | Staff wouldn't feel able or confident in reporting without a system that could lead to a culture of acceptable bullying and harassment. | | | | | Staff have the details of other leaders in the trust including the chair of the trust board. | |

| Considerations | Yes | No | Hazard | Who might be harmed | Level of risk | | | Preventative action | Date completed |
|---|-----|----|---|---------------------|---------------|-----|------|--|----------------|
| | | | | | Low | Med | High | | |
| Is your workforce so small that confidentiality and confidence to raise issues may be difficult to achieve? | | X | | | | | | | |
| Have there been previous cases of harassment? | | X | | | | | | | |
| Are line managers consistent at, and enforce disciplinary and grievance policies? | X | | Staff wouldn't feel able or confident in reporting without a system that could lead to a culture of acceptable bullying and harassment. | Staff | | | | All relevant policies annually reviewed and updated with leaders, staff, HR and unions (JCNC), HR professional services work alongside all senior leaders and staff. Staff union membership. | |
| Do you ensure prompt, thorough and impartial investigations of sexual harassment complaints? | X | | Staff wouldn't feel able or confident in reporting without a system that could lead to a culture of acceptable bullying and harassment. | Staff | | | | As above | |
| Are there support systems in place for victims of sexual harassment, such as | X | | Staff wouldn't feel able or confident in reporting without a system that could | | | | | Counselling support available for all staff – noted in the harassment and | |

