BRIDGELEA PRIMARY SCHOOL

Bridgelea Primary School	Bridgelea Primary School
Bridgelea Road	Plymouth Grove West
Withington	Longsight
Manchester	Manchester
M20 3FB	M13 0AQ

POLICY INFORMATION

Policy Title	[Insert Policy Title]
Lead Officer	Kelly Eyre
Status	Statutory
Implemented By	Senior Leadership Team
Presented By	Kelly Eyre
Ratified By	Full Management Group
Approval Date	October 2026
Last Reviewed	New Policy
Review Date	Autumn 2026

UNDERSTANDING PEOPLE

Communication • Inclusion • Safety • Aspiration

Our Vision

Our vision of **Understanding People** captures our core purpose.

At Bridgelea, we support children, families and communities to develop a deeper understanding of themselves and others. Through nurturing relationships, high-quality teaching and an ambitious curriculum, we help every child develop the knowledge, skills and confidence they need to thrive now and in the future.

We believe that understanding behaviour, emotions, learning and relationships creates the foundation for success, wellbeing and positive life outcomes.

THE BRIDGELEA VALUES

Communication

We believe every child deserves to be heard and understood.

We help children develop their speech, language and communication skills so they can express themselves, build relationships and access learning successfully. Staff use visual supports, clear language and personalised strategies to make communication accessible for everyone.

Inclusion and Partnership

We know that children achieve best when school and home work together.

We build strong partnerships with families and work closely with external agencies, including health, social care and mental health services, to ensure children receive the support they need. We celebrate difference and ensure every child feels welcomed, respected and included.

Safety and Wellbeing

Children learn best when they feel safe, secure and cared for.

Safeguarding and wellbeing are at the heart of everything we do. We help children develop strategies to manage emotions, build resilience and make safe choices both in school and beyond. Our nurturing environment supports the wellbeing of children, families and staff alike.

Aspiration and Independence

We want every child to believe in themselves and their future.

We encourage children to develop confidence, independence and the skills they need for life. Through high expectations, meaningful experiences and positive relationships, we help children become resilient learners who are ready for their next steps.

THE BRIDGELEA WAY

At Bridgelea we:

- Place nurture and relationships at the heart of our practice.
- Prioritise communication and language development.
- Provide an ambitious and personalised curriculum.
- Teach children about rights, responsibilities and respect.
- Develop independence, resilience and preparation for adulthood.
- Work in partnership with families and external agencies to secure the best possible outcomes for every child.

Our curriculum is designed around the needs of our children. It is flexible, ambitious and nurturing, supporting progress both academically and personally whilst preparing children for success in school, their community and later life.

RIGHTS RESPECTING SCHOOL

As a UNICEF Rights Respecting School, children's rights underpin our policies, curriculum and daily practice.

Through their work with the School Council, children identified ten key articles from the United Nations Convention on the Rights of the Child (UNCRC) that they believe are particularly

important to life at Bridgelea. These articles help guide our work whilst recognising that all rights are universal, indivisible and equally important.

Bridgelea Key Articles

Article 12

Children have the right to give their opinions and for adults to listen and take them seriously.

Article 13

Children have the right to seek, receive and share information and ideas.

Article 15

Children have the right to choose friends and join groups.

Article 24

Children have the right to the best possible healthcare, clean water, healthy food and a safe environment.

Article 27

Children have the right to a standard of living that meets their needs.

Article 28

Children have the right to a good quality education.

Article 29

Education should help children develop their talents and abilities, respect others and care for the environment.

Article 30

Children have the right to enjoy their own culture, language and religion.

Article 31

Children have the right to rest, relax and play.

Article 39

Children have the right to support and recovery if they have experienced harm, neglect or abuse.

OUR NURTURING APPROACH

Bridgelea's practice is underpinned by the principles of nurture.

The nurturing approach provides opportunities for children and young people to experience and develop the social, emotional and relational skills that may have been disrupted through adverse experiences. Through nurturing relationships, children develop resilience, confidence, self-regulation and the ability to engage successfully in learning and life.

The Six Principles of Nurture

1. Children's learning is understood developmentally.
2. The classroom offers a safe base.
3. The importance of nurture for the development of wellbeing.
4. Language is a vital means of communication.
5. All behaviour is communication.
6. The importance of transitions in children's lives.

EQUALITY AND INCLUSION STATEMENT

Bridgelea Primary School is committed to providing an inclusive environment where all pupils, staff, families and visitors are treated with dignity, respect and fairness. We actively promote equality of opportunity, challenge discrimination and celebrate diversity within our school community.

SAFEGUARDING STATEMENT

Safeguarding is everyone's responsibility.

Bridgelea Primary School is committed to safeguarding and promoting the welfare of children and young people. All policies should be read alongside the school's Child Protection and Safeguarding Policy, Behaviour Policy, Staff Code of Conduct, Whistleblowing Policy and the most recent version of *Keeping Children Safe in Education (KCSIE)*.

APPLYING THIS POLICY

This policy should be read in the context of Bridgelea's vision, values, nurturing approach and commitment to children's rights. The implementation of this policy is intended to support children to be safe, understood, successful and prepared for their next stage of learning and life.

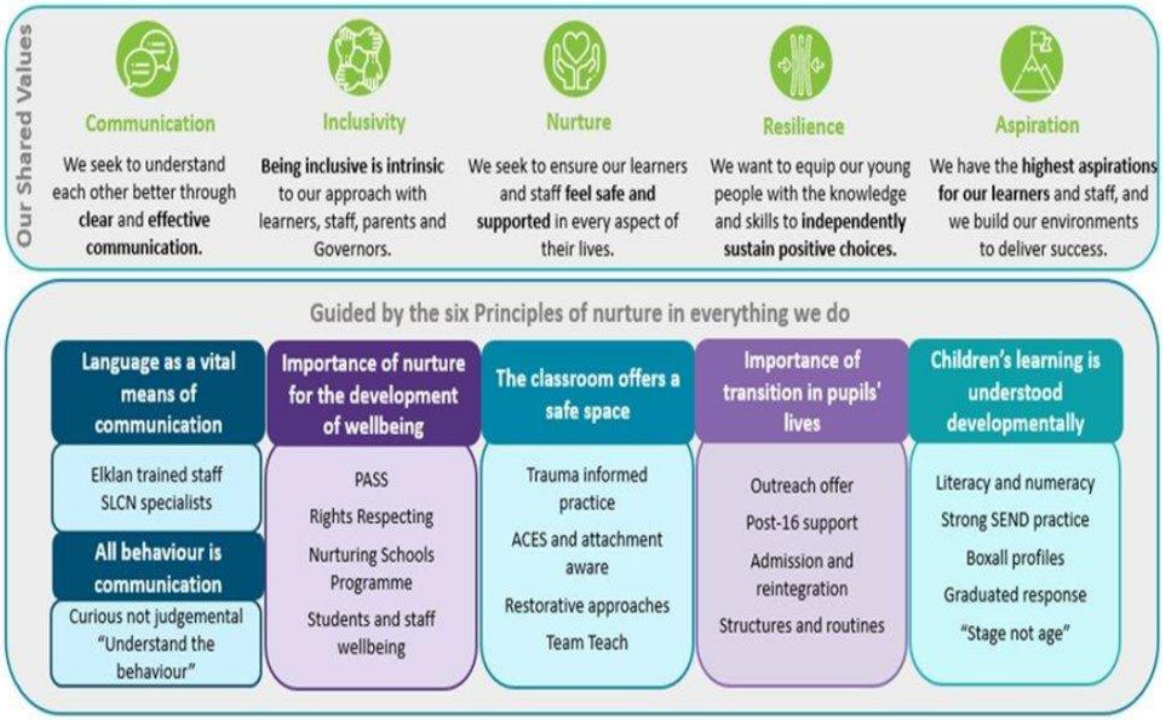
POLICY CONTENT

Sexual Harassment Policy and Procedure

February 2025

Implemented	**SLT**
Presented by	**Lisa Shaw**
Ratified by Governors	**March 2025**
Review Date	**March 2026**

Our overall vision of '**Understanding People**' captures our core purpose perfectly. At Bridgelea we want to help our children, families, and communities to understand themselves and others more, whilst keeping their understanding of the statutory and wider curriculum.



Gold Rights Respecting School

Through the School Council the children decided they would like to focus on the following 10 Articles, whilst understanding no right is more important than another:

Article 12

You have the right to give your opinion, and for adults to listen and take it seriously.

Article 13

You have the right to find out things and share what you think with others, by talking, drawing, writing or in any other way unless it harms or offends other people.

Article 15

You have the right to choose your own friends and join or set up groups, as long as it isn't harmful to others.

Article 24

You have the right to the best health care possible, safe water to drink, nutritious food, a clean and safe environment, and information to help you stay well.

Article 27

You have the right to food, clothing, a safe place to live and to have your basic needs met. You should not be disadvantaged so that you can't do many of the things other kids can do.

Article 28

You have the right to a good quality education. You should be encouraged to go to school to the highest level you can.

Article 29

Your education should help you use and develop your talents and abilities. It should also help you learn to live peacefully, protect the environment and respect other people.

Article 30

You have the right to practice your own culture, language and religion - or any you choose. Minority and indigenous groups need special protection of this right.

Article 31

You have the right to play and rest.

Article 39

You have the right to help if you've been hurt, neglected or badly treated.

This model policy and procedure has been produced by One Education's HR and People service. The HR and People team provides management and HR support and advice to schools and academies purchasing their services under an agreed Service Agreement. For further information please contact the HR and People team via the Helpline: 0161 276 0153 or Email: hrpeople@oneeducation.co.uk Website: www.oneeducation.co.uk

This policy is recommended for adoption by all maintained schools including community, voluntary controlled, community special, maintained nursery, foundation, foundation special and voluntary aided schools. It is also recommended for adoption by academies and free schools (modified as appropriate and taking into account the particular circumstances of the relevant academy or free school). Some school or academy specific provisions are included. This policy should therefore be adapted as necessary and inappropriate provisions deleted. The HR and People team can assist in adapting this policy to fully reflect a school's status including their academy or multi academy trust (MAT) status.

References in this policy to schools include a reference to academies and free schools unless otherwise stated. References in this policy to the Headteacher include a reference to an academy or free school Principal and references to the Management Group include references to governing boards and/or trust boards as applicable.

HR and People can provide training and support in implementing this document and can advise schools on good practice, highlight any legal requirements and discuss proactive and preventative steps in the management of sexual harassment complaints

Document Control	
Title	Sexual Harassment Policy and Procedure
Date	January 2025
Related policies/guidance	Grievance Bullying and Harassment Policy and Procedure; Equality Policy; Whistleblowing Policy; Disciplinary Policy and Procedure; Code of Conduct; Social Media Policy; Lone Working Policy; Communication & Relationships Policy.
Review	annually
Author	HR and People, One Education Ltd
Date consultation completed	October 2026
Date adopted by Management Group	October 2026

Equality Statement: - Under the public sector equality duty (PSED), all schools/academies must have due regard to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited by the Equality Act 2010; to advance equality of opportunity between those who share a relevant protected characteristic and those who do not share it and to foster good relations across all protected characteristics. This means schools/academies must take into account equality considerations when policies are being developed, adopted and implemented.

The One Education HR and People team regularly reviews all policies and procedures which are recommended to schools/academies to ensure compliance with education and employment legislation including the Equality Act 2010. Consultation with schools/academies is an important part of this review process. Headteachers, Principals and Governing Bodies are asked to contact the HR and People team via the Helpline if they believe there are any negative equality impacts in their school/academy in relation to the application of this policy/procedure.

1. INTRODUCTION AND PUPOSE

1.1 All members of staff working at Bridgelea school are entitled to be treated with dignity and respect and to work in an environment where they feel safe and supported. The Management Group of Bridgelea Primary School is committed to providing a safe, inclusive and supportive working environment for all staff and to creating a workplace free from all forms of discrimination and a culture where sexual harassment in the workplace and victimisation of staff who report sexual harassment is not tolerated.

1.2 This policy sets out Bridgelea's approach to preventing and addressing sexual harassment which may take place in the workplace (on or off school premises) including harassment by third parties, and which occurs in the course of employment or third-party engagement. This includes, but is not limited to conduct on school premises, in after school meetings, whilst working at home or offsite; at school events (including learning or training events); when travelling to events, conferences or other venues; work functions and social events. Sexual harassment may also take place via digital or virtual means including on social media platforms such as WhatsApp, Zoom and Microsoft Teams. This policy also covers situations which may not take place in the course of employment or engagement but where the conduct or behaviour in issue has an impact on the person's suitability to carry out, or continue in, their role at school.

1.3 This policy also sets out the process members of staff should follow in order to raise complaints of sexual harassment against other employees and/or against third parties an against pupils and provides a framework for how such complaints will be addressed by the school and how alleged perpetrators will be dealt with.

1.4 Initially, all complaints of sexual harassment (including complaints about third parties) will be dealt with under this policy. In appropriate cases, complaints about employees will also be dealt with as a disciplinary matter under the school's Disciplinary and Dismissal Policy. Sexual harassment by an employee may be treated as gross misconduct and if an allegation is upheld following disciplinary action, this may result in a disciplinary sanction up to and including dismissal. In disciplinary proceedings, relevant factors in determining an appropriate sanction will include, but are not limited to, the facts and circumstances of the particular case, whether there has been an abuse of power over a more junior colleague and, where the allegation involves an out of work situation, the impact of the conduct on the employee's suitability to carry out or to continue in their role in school. The school's Relationships Policy will be followed in relation to complaints of sexual harassment involving the conduct or behaviour of a pupil.

1.5 The Management Group and the Headteacher have overall responsibility for the implementation of this policy. Lisa Shaw (Designated Safeguarding Lead) and Julie Heslop (Safeguarding Governor) have responsibility for monitoring the effectiveness of this policy and for ensuring it is reviewed on a regular basis.

1.6 The school's approach for dealing with grievances, bullying, complaints about harassment (other than sexual harassment), victimisation and/or other forms of discriminatory conduct is set out in the school's Grievance, Bullying and Harassment Policy and Procedure, Code of Conduct and Disciplinary and Dismissal Policy.

1.7 This policy takes account of the legal requirements placed on the school by the Worker Protection (Amendment of Equality Act 2010) Act 2023 which creates a duty on employers to take reasonable steps to prevent sexual harassment in the workplace (the "preventative duty"). This policy also takes into account the provisions relating to sexual harassment in the Equality Act 2010 and the recommendations set out by the Equality and Human Rights Commission in their Technical Guidance document. (Sexual Harassment and Harassment at Work - Technical Guidance 2024).

1.8 This policy should be read in conjunction with the school's Equality Policy which sets out the school's approach to equality issues in general including under the school's Public Sector Equality Duty pursuant to s149 Equality Act 2010, and to all forms of unlawful behaviour and discrimination under the Equality Act 2010.

2. KEY PRINCIPLES

2.1 All complaints about sexual harassment will be taken seriously and prompt confidential action will be taken in accordance with this policy. Bridgelea is clear that nobody should have to experience sexual harassment at work. Sexual harassment can have a profound, long lasting and damaging impact on those involved and can have a negative impact on morale, performance, health and wellbeing and the ethos and reputation of the school.

2.2 Whilst any response by the school to conduct or behaviour which amounts to sexual harassment will always depend on the facts and circumstances of the case, this school is committed to a zero-tolerance approach to sexual harassment.

2.3 The school will ensure that any person involved in the investigation or management of a complaint about sexual harassment (whether the process is informal or formal) will keep the details confidential subject to any legal and statutory reporting obligations. Details of any investigation and the names of a complainant and an alleged harasser will only be disclosed on a strictly "need to know" basis.

2.4 In the application of this policy, the school may collect, process and store personal data in accordance with the school's Data Protection policy. The school will comply with data protection laws as amended and updated from time to time. Records will be kept on employee's personnel file in line with the school's Data Protection policy and in line with data protection legislation. This includes information about a complaint, notes and other documents compiled during the investigation process and outcomes. In relation to reporting outcomes, cases will be considered on an individual basis and advice will be taken by the school as appropriate to ensure disclosure is proportionate and not in breach of data protection laws. The school will record its decision about whether an outcome, including any disciplinary action against the perpetrator, can be disclosed to a complainant giving reasons for the decision.

2.5 In the investigation or management of a complaint about sexual harassment, then school will be mindful of its obligations and duties under the Equality Act 2010. Reasonable adjustments will be made where required to assist an employee or their companion with a disability. If there are any language issues affecting an employee and/or their companion, these will be reasonably addressed so matters can proceed fairly.

2.6 If an employee needs support which cannot be provided by a Trade Union representative or a colleague, the school will consider all the circumstances of the case and *may* exercise discretion to permit the employee to be supported in meetings under this policy by another appropriate person.

3. SCOPE AND DEFINITIONS

3.1 This policy applies to all school employees irrespective of seniority of service, working hours or type of contract (permanent, temporary or fixed term). It also applies to workers (as defined in the Equality Act 2010) and to consultants, apprentices, volunteers and students on placements.

3.2 The school has a duty to take reasonable steps to prevent sexual harassment of staff by third parties and also has a duty towards individuals employed by external organisations and third parties to protect them from sexual harassment in the course of their engagement or whilst working on or visiting school premises. Accordingly, there are parts of this policy which are applicable to third parties interacting with school staff such as agency workers, secondees and visitors to the school including parents. There are also parts of this policy which are applicable to the conduct and behaviour of pupils towards members of staff.

3.3 Employees of this school who are seconded or deployed to another organisation or and who make a complaint about sexual harassment by a member of staff in that other organisation will be supported by senior leaders in this school to report sexual harassment in accordance with this policy and also, in appropriate cases, in accordance with the other organisation's own Sexual Harassment Policy.

3.4 All members of staff and individuals referred to in paragraphs 3.1 and 3.2 above are required to comply with this policy and will be made aware of this policy and the school's zero tolerance approach towards sexual harassment in the workplace.

3.5 We expect any third-party organisation supplying staff to work at this school to engage and cooperate in any investigation where allegations of sexual harassment have been made against that member of supply staff and to take appropriate action and provide appropriate support as is reasonable in the circumstances.

3.6 For the avoidance of doubt, in this policy any reference to a **"school working day"** will have the following meaning: -

(a) School Support Staff: - any day during an academic year when a school is normally open for educational purposes or when staff are in attendance for training purposes, and

(i) in the case of staff contracted to work during term time only, **excluding** any day which falls on a Bank Holiday or within school holiday periods, and

(ii) in the case of staff contracted to work all year round, excluding any day which falls on a Bank Holiday but **including** any day which fall within school holiday periods.

(b) School Teaching Staff: - any day during an academic year when a school is normally open for educational purposes or when staff are in attendance for training purposes but **excluding** any day which falls on a Bank Holiday or within school holiday periods.

4. DEFINITION OF SEXUAL HARASSMENT

4.1 Sexual harassment is defined in the Equality Act 2010 (s26(2)) as **unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.**

4.2 Unwanted conduct includes unwelcome and/or uninvited conduct and covers a wide range of behaviour. It does not need to occur in person or within normal school working hours. It can be physical, verbal or visual and can take place anywhere (see paragraph 1.2 above).

4.3 Examples of **conduct of a sexual nature** include but are not limited to: -

- sexual comments or jokes, which may be referred to as "banter"
- displaying sexually graphic pictures, posters, or photos
- suggestive looks, staring or leering
- propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person's private or sex life or a person discussing their own sex life
- sexual posts or contact in online communications, including on social media
- spreading sexual rumours about a person
- sending sexually explicit emails, text messages or messages via other social media
- unwelcome touching, hugging, massaging or kissing
- comments on someone's appearance with explicit sexual references or with sexual undertones and implications
- wolf whistling and cat calling
- treating someone less favourably because they have submitted to or refused to submit to unwanted conduct of a sexual nature in the past

4.4 Anyone can experience sexual harassment, regardless of their sex or sexual orientation and regardless of the sex or sexual orientation of the alleged perpetrator. It can be experienced by and carried out by men, women and people of any gender identity.

4.5 Conduct will amount to sexual harassment if it has the *purpose or effect* of violating a person's dignity and/or creating an intimidating, hostile, degrading, humiliating or offensive environment for the employee even if that was not the *intended purpose*. Conduct does not need to be objected to in order to be considered unwanted. Conduct that was previously welcomed can subsequently *become* unwanted conduct amounting to sexual harassment.

4.6 Someone may be sexually harassed even if they were not the intended target of the conduct/behaviour. Conduct does not need to be specifically directed at a particular individual to constitute sexual harassment as it may still have the effect of creating an intimidating, hostile, humiliating, offensive or degrading environment for them.

4.7 Behaviour which constitutes sexual harassment may occur on a single occasion; it may be sporadic or it may take the form of a continuing process.

4.8 Sexual harassment may be committed by school employees or by third parties such as members of staff supplied through an agency or otherwise. Third party sexual harassment of staff in this school will not be tolerated. If any school employee is subjected to sexual harassment from a third party, this will be taken no less seriously than if an allegation were about another employee. If an allegation of sexual harassment is made about a third party the school will initially deal with the matter under this policy and will also report the allegation to the third party's employer or representative organisation without delay. Appropriate steps will always be taken to ensure the safety of those involved. How the school will address complaints from and about third parties is set out in paragraph 12 below.

4.9 Sexual harassment may also amount to a safeguarding issue and/or a criminal offence and may lead to police involvement. Sexual harassment amounting to a criminal offence includes but is not limited to sexual assault, indecent exposure, voyeurism and offensive communications. If an individual makes a complaint of harassment that may amount to a criminal offence, the school will raise the possibility of reporting the matter to the police and will provide the person making the complaint with the necessary support. There may be cases where the school will take the decision to report the matter to the police contrary to a complainant's wishes. In these cases, all the facts and circumstances will be considered including the risk of harm to the complainant, colleagues or other individuals. If the police are involved, the school will liaise with them regarding the school's internal processes and any disciplinary investigation in order to prevent prejudice to any criminal investigation or legal proceedings.

5. STEPS TO PREVENT SEXUAL HARASSMENT

5.1 There are no specific steps employers must take to prevent sexual harassment from occurring in the workplace. Employers must take action that is reasonable. The Management Group and Senior leaders in this school are committed to taking measures to foster a culture of dignity, respect and professionalism in the workplace and which underline our zero-tolerance approach to sexual harassment.

5.2 The steps the school is committed to take to comply with its preventative duty, which includes steps the school will take to prevent third party harassment from occurring include, but are not limited to the following. The school will: -

- Ensure there is a designated senior leader (DSL) and a link governor (Safeguarding Governor) to take responsibility for the implementation, monitoring and review of this policy and to monitor the steps the school has committed to take to comply with its preventative duty;

- Ensure this policy is available, accessible, implemented and communicated to all staff working in and with our school and to all those visiting our school, ensuring it is published on the school's website and the school's intranet;

- Communicate the policy via internal newsletters, notice boards (physical and digital) and at staff meetings and training, providing written and verbal reminders ahead of key events where the risk of sexual harassment might increase;

- Ensure Line Managers are trained so any warning signs of sexual harassment are picked up during meetings with staff members. This might include during informal 1 2 1 meetings, in sickness absence or return to work meetings, in meetings about conduct or performance, in exit interviews and following feedback from staff surveys;

- Provide training for workplace champions to enable them to provide support and advice to those who witness or experience sexual harassment;

- Carry out risk assessments to identify any potential risks of sexual harassment in the workplace and to anticipate scenarios where school staff might be subject to sexual harassment in the course of their employment or engagement. Risk assessments will consider the specific context of the working environment including but not limited to risks associated with off-site working; lone working; out of hours working; the benefits of implementing CCTV in isolated work spaces; working on secondment; working alone with a third party; attending conferences or off-site training events; socialising with colleagues out of work and social media contact. Risk assessments will inform any necessary changes to the workplace which include the need to introduce protective measures such as modifying procedures and/or working arrangements and increasing supervision. Risk assessments will be reviewed regularly and mitigating action taken if any new or additional risks are identified.

- Prepare an action plan that sets out what preventative steps the school will take to address any identified risks and to address how the position will monitored. The action plan will be published on the school's website;

- Promote a culture of transparency where school staff feel empowered and are encouraged to speak up by providing informal and formal channels to report sexual harassment and/or victimisation without fear of repercussions;

- Set up anonymous reporting channels to encourage staff to speak up if they are fearful of identifying themselves (see paragraph 6.3);

- Provide training to members of staff (see paragraph 13) on a regular basis to raise awareness about sexual harassment and the school's preventative duty. Training will be given on induction and will cover what possible outcomes might be in response to a complaint of sexual harassment;

- Carry out an annual review and monitor the effectiveness of this policy and of staff training referred to above (see paragraph 14);

- Ensure regular review of all related school policies and to ensure they reflect the school's preventative duty, interact well and are updated to take into account the school's legal obligations around preventing sexual harassment in the workplace;

- Communicate the school's zero tolerance approach to third parties (see paragraph 12);

- Raise awareness and understanding of harassment and sexual harassment with pupils in a manner consistent with statutory requirements around the school curriculum and the Equality Act 2010 whilst always taking into account the age and levels of understanding of the pupils;

- Attach signage to the walls of the areas in the school where visitors and other third parties are present to warn that harassment and sexual harassment of our staff is not tolerated;

- Inform callers to the school by recorded message at the beginning of telephone calls of the school's zero-tolerance policy on harassment, sexual harassment and other forms of unlawful discrimination;

- Set up a new data protection compliant evidence hub for Senior Leaders/Line Managers to record details of reported incidents and evidence of sexual harassment, both formal and informal; all reported incidents will be added to CPOMS Staff.

- Review evidence from the data hub at least every 6 months to identify any trends and to ensure appropriate action is taken;

- Review staff surveys (at least annually) to obtain an accurate picture of whether sexual harassment is occurring in the workplace and to ensure any actions taken by the school under this policy are appropriate and effective.

- **Inform school suppliers including supply agencies and supply staff at the outset of their engagement with the school about this policy, about the school's expectations of them and our zero-tolerance approach to sexual harassment;**

- **Ensure third party contract conditions require agencies supplying staff to work at our school to inform their workers about this policy and to make sure before coming to work with us, agency staff are clear about our zero-tolerance approach to sexual harassment and victimisation in the workplace and how this will be dealt with;**

- **Check what arrangements agencies have in place for the prevention of sexual harassment and victimisation. We will enquire how agencies will deal with any such complaints from their agency staff. The school expects agencies to provide guidance to their staff about sexual harassment and that it is unlawful and to provide guidance about how agency staff can make a complaint about sexual harassment in the course of the agency agreement.**

6. REPORTING SEXUAL HARASSMENT

6.1 Any member of staff or third party can make a disclosure or complaint about sexual harassment or victimisation for submitting to or refusing to submit to unwanted conduct of a sexual nature. There are various ways to do this. In this school making a disclosure or complaint to one of the following people:-

- **For employees - their Line Manager**
- **The school's trained workplace champion (Lisa Shaw)**
- **One of the school's mental health first aider (Diane Hallworth & Amy Robinson)**
- **The SLT designated equality lead (Amy Robinson)**
- **The school's link Safeguarding Governor (see paragraph 1.5 above)**

6.2 The person to whom a report is made may ask questions to establish the facts and to guide the complainant as to their options and the most appropriate course of action. If the complainant wishes to follow an informal route, the person providing support will refer them to paragraph 7 of this policy. If the complainant wishes to raise a formal complaint, they will be helped to put their concerns in writing if that is what they would like to do so that they can use this during the investigation process to save them having to repeat their concerns. If the complainant wishes to put their concerns in writing without support, they may use the pro forma attached at Appendix 1 as part of the formal investigation process.

6.3 Individuals are able to report an issue involving sexual harassment to one of the above people anonymously. If an anonymous complaint is received, the formal steps in this policy will be followed as far as is reasonably practicable taking into account the nature and extent of the information detailed in the anonymous report. It is always preferable for individuals reporting sexual harassment to identify themselves as it makes it more likely that the complaint can be fully and fairly investigated and/or resolved. It also helps to maintain an open and trusting culture in the school and means that where appropriate, the person making the complainant can be kept informed about the progress and/or outcome of the school's investigation.

7. INFORMAL COMPLAINTS

7.1 Members of staff may wish to try to resolve sexual harassment issues informally. If a member of staff feels safely able to do this, and this is their preferred method of approach, they may decide to speak to the alleged harasser directly. This will enable them to explain to the other person how their conduct has made them feel, why the conduct or behaviour is unacceptable and that it is unwanted or unwelcome and they would like it to stop.

7.2 An informal approach is not the school's expected method of approach and the onus is never on any individual to resolve an issue involving sexual harassment informally or personally.

7.3 Members of staff may wish to try to resolve an issue informally but may not feel able to do so by a direct approach. If this is the case, the school will ensure support is available from a senior leader, Line Manager and/or HR or Trade Union representative wherever reasonably possible.

7.4 The person nominated to provide support will listen to the complaint and will try to establish how best to resolve the matter informally. This may include a range of options including arranging mediation, arranging counselling or seeking advice or support from another external source as appropriate. Mediation through a trained mediator is a voluntary process where the mediator helps people in dispute to attempt to reach an agreement. It is not the place of the mediator to judge or to tell those involved in the mediation what they should do. The mediator will facilitate the process of seeking to resolve the problem.

7.5 If informal steps have been unsuccessful or if an informal approach is not possible or is inappropriate, a formal complaint may be raised in accordance with paragraph 8 below.

8 MAKING A FORMAL COMPLAINT

8.1 Staff members wishing to make a formal complaint about sexual harassment should initially contact the headteacher whose role it is to ensure the complaint is fully investigated. If the complaint is about the headteacher, complainants should refer their concerns initially to the school's Chair of Governors. The headteacher, or the Chair of Governors as appropriate, will then nominate a suitably trained, senior person to carry out the investigation, taking into account all the circumstances including the sensitivities of the particular case. If the circumstances require, the school may appoint an external investigator. The school investigator may be accompanied at meetings by the school's HR provider.

8.2 Any investigation will be thorough, impartial and objective for all those involved. The details of the investigation will be kept confidential and information about the case should not be shared with people not involved in the investigation. The complainant, the alleged harasser and any witnesses will be instructed not to discuss the matter with anyone unless given authority to do so by the nominated investigator. A breach of confidentiality is a disciplinary matter and in appropriate cases, a breach of confidentiality will be dealt with in accordance with the school's Disciplinary and Dismissal Policy.

8.3 If a complainant wishes to put their complaint in writing, they should set out full details of the conduct or behaviour being complained about, the name of the alleged harasser the nature of the sexual harassment, the dates and times at which it occurred, the names of any witnesses to the conduct and any action taken so far to try to stop the alleged harassment. The form at Appendix 1 to this policy may be used.

8.4 The investigator should where possible contact the complainant within 5 school working days of receiving their complaint to arrange a date, time and venue for an initial investigation meeting to explore the nature of the complaint. The meeting should take place as soon as is reasonably possible. The complainant is entitled to be accompanied at the meeting by a colleague or trade union representative or by another person where reasonably appropriate (see paragraph 2.6).

8.5 The purpose of the meeting with the complainant will be to clarify the nature of the formal complaint and any issues in relation to the information submitted. Follow up meetings may be appropriate throughout the investigation process both with the complainant and any witnesses (who may be accompanied by a colleague or Trade Union representative if they wish). The complainant will be kept updated as far as is reasonably practicable about timescales and progress.

8.6 Meetings will also be held with the alleged harasser (who may also be accompanied by a colleague or Trade Union representative) to hear their account of events. The alleged harasser will be given full details of the complaints made to enable them to respond to the allegations made against them. In exceptional cases, if the person making the complaint and/or witnesses have a genuine fear of reprisals, it may be appropriate for the investigator to agree that any reports/outcome and witness statements can be anonymised

8.7 Where a complaint is about a school employee, the school will carry out a risk assessment about the working arrangements of those involved and will also consider whether suspension on full pay of the alleged harasser is appropriate. The school may also need to consider whether it is necessary to agree

temporary changes to working arrangements pending the outcome of the investigation. Any suspension or changes to working arrangements will be reviewed by the school on regular basis.

8.8 If a complaint is about a third party (e.g., a member of agency staff, a contractor or visitor) the school will discuss the matter with the third party direct and/or liaise with the third-party organisation about the investigation process. The school will also consider whether any action is necessary to protect the complainant and anyone else involved in the investigation process.

8.9 If a member of staff raises a complaint but then during the investigation asks that the matter is not taken any further, the investigator will in most cases take steps to ensure the matter is resolved which might include: -

- keeping a record of the complaint and the worker's request (including reasons stated) to keep the matter confidential;
- encouraging the worker to address the issue informally either directly or with support;
- providing the worker with any necessary support and guidance on how to address the issue informally;
- keeping the situation under review by checking in with the worker to find out if the situation has improved;
- where the situation has not improved, explaining to the worker that the matter should be addressed for both for their wellbeing and that of their colleagues.

8.10 Where possible the investigator will respect the wishes of a complainant but there may be circumstances in which the risk of not taking action outweighs the risk arising from overriding the complainant's wishes. The investigator will take into account all the circumstances of the case including whether all other options under this policy have been exhausted; the impact of overriding the complainant's wishes; the potential risks to the complainant, colleagues and third parties if no further action is taken; whether other complaints have been made about the same person and, the likelihood of the matter being resolved without the school's intervention.

8.11 Further action may be appropriate where there is an immediate risk to the safety of the complainant or others, particularly where criminal behaviour has taken place. If the school decides formal action must be taken it will explain its decision to the complainant and will ensure appropriate safeguards are put in place to prevent further harassment or victimisation of the complainant as well as providing support and counselling as appropriate for the complainant to deal with any impact the decision may have.

9. THE OUTCOME

9.1 On conclusion of the investigation, a report will be prepared by the investigator and submitted to the headteacher or Chair of Governors as appropriate. A meeting will be arranged with the complainant, usually within 10 school working days of completion of the report where the findings of the investigation will be shared in person and then this will be followed up in writing. The complainant has a right to be accompanied at his meeting by a colleague or a Trade Union representative or other representative as appropriate. There will be a discussion about the outcome and what action, if any that should be taken.

9.2 Prompt action will be taken by the school if it is found that sexual harassment has occurred. Where the alleged harasser is an employee, the matter will be dealt with as appropriate under the school's Disciplinary and Dismissal Policy.

9.3 Where the alleged harasser is a third party, appropriate action will be taken which include speaking to the person or the third-party organisation about the conduct in issue, banning them from the school premises and terminating the business arrangements (see paragraph 12.4 below).

9.4 Where the alleged harasser is a pupil at the school, the matter will be dealt with by the Headteacher and/ or Chair of Governors as appropriate in accordance with the school's Relationships Policy.

9.5 Whether or not a sexual harassment complaint is upheld and where the alleged harasser is an employee who is not dismissed following disciplinary action as a result of a complaint, the school will consider how best to manage the ongoing working relationship between the complainant and the alleged harasser. It may be appropriate for example to arrange for mediation or counselling or to

agree a change in the working arrangements of one or both parties.

9.6 Employees will not be subjected to disciplinary action or to any other detriment simply because their complaint of sexual harassment is not upheld. Whilst the vast majority of complaints about sexual harassment are made in good faith, there may be occasions however when a complaint is made that is malicious. This is where the complaint is both false and made in bad faith, i.e., without an honest belief in its truth. Malicious complaints by employees will be dealt with as a disciplinary matter under the school's Disciplinary and Dismissal Policy and may ultimately lead to a disciplinary sanction up to and including dismissal.

10. APPEALS

10.1 If the complainant is dissatisfied with the outcome of the investigation, there is a right of appeal to the Management Group Appeal Committee. The person to whom any appeal should be addressed will be confirmed to the complainant when the outcome of the investigation is delivered to them. Appeals will not be a rehearing of the evidence reviewed during the investigation of the sexual harassment complaint. An appeal will be a review of the decision-making process that led to the outcome of the investigation.

10.2 Where an appeal is to be considered by a Management Group Appeal Committee, this will be a committee of three governors from the school's Management Group. None of the governors sitting on the Appeal Committee will have had any prior involvement in the investigation of the complaint.

10.3 Full grounds of appeal should be provided by the complainant in writing (using the Appeal Form attached at Appendix 2) and should be submitted to the person/ body referred to in paragraph 10.1 above within 10 school working days of the date of the letter confirming the outcome of the school's investigation.

10.4 The school will endeavour to hold an appeal meeting normally within 20 school working days following receipt of the complainant's written appeal. If it is not possible for an appeal meeting to be held within this timeframe, the complainant will be advised when the appeal meeting is reasonably expected to take place. Complainants may be accompanied at appeal meetings by a colleague or Trade Union representative or other representative as appropriate (see paragraph 2.6).

10.5 The appeal decision will normally be confirmed to the complainant within 10 school working days of the appeal meeting. The complainant) will be informed that the decision is final and that there is no further right of appeal.

10.6 Regardless of the outcome of the investigation and/or appeal process complainants will not be victimised or subjected to any detriment for having brought a complaint or an appeal.

11. WITNESSES TO SEXUAL HARASSMENT OR VICTIMISATION

11.1 Members of staff who witness sexual harassment or victimisation are encouraged to take appropriate steps to address it and will be supported by the school where they do so. This might include: -

- intervening where a witness feels able to do so;
- asking the person subjected to the harassment if they would like support and if so, supporting the victim to report the conduct or reporting it on their behalf;
- reporting the conduct or behaviour where a witness feels there may be a continuing risk if they do not report it;
- co-operating in any investigation into the conduct or behaviour;

11.2 Any witness providing information or reporting concerns about sexual harassment to the school will be provided with appropriate support and the school will ensure they are not subjected to any form of detriment or victimisation by others.

12. THIRD PARTIES

12.1 The school will ensure third parties with whom the school has a relationship are aware of this policy and are clear that the Management Group and Senior Leaders in this school will not tolerate sexual harassment of school staff. A third party is someone who is not an employee of the school and includes suppliers, contract workers, agency workers, volunteers, parents, friends and family members of colleagues and members of the public.

12.2 **The school will take reasonable steps to prevent third party harassment from occurring. The preventative steps the school has committed to take in relation to third parties are included in the steps detailed in paragraph 5.2 above.**

12.3 If an employee of the school wishes to make a complaint about third party sexual harassment, they should follow the process detailed in this policy.

12.4 If a third party sexually harasses a member of school staff the school will speak to the third party direct or to their superior in appropriate cases (or both) about their conduct and may ban the third party from school premises or from working with or for the school. The school may also ban a third party or third-party organisation from events or meetings at school or from contacting school staff and may terminate any business relationship. In cases involving criminal conduct then school may report such conduct to the police and may share information with relevant statutory authorities.

12.5 The school expects agencies supplying staff to work in school to engage and cooperate in any investigation where allegations of sexual harassment have been made against an agency worker, and to take appropriate action and provide support as deemed reasonably necessary and appropriate.

12.6 If during the course of the agency agreement, an agency worker makes a complaint of sexual harassment against a member of school staff, the headteacher will inform the agency and the school will usually undertake a preliminary investigation. The school will then update the agency on the outcome of the preliminary investigation and, dependent upon what has been agreed with the agency, the complaint against the member of school staff will be investigated and dealt with in accordance with this policy and the school's Disciplinary Policy as appropriate and will be passed to the agency for them to deal with the mater in accordance with their own Sexual Harassment Policy.

12.7 The school will cooperate in any external investigation where an allegation of sexual harassment has been made against a school employee.

12.8 The school will ensure agency workers have been provided with guidance prior to their engagement with the school so they know whose policy applies in which circumstances. Agency workers should receive an induction on both the school's and the agency's sexual harassment policies and procedures.

13. TRAINING AND AWARENESS

13.1 All members of staff must attend equality training when requested to do so by Senior Leaders or their Line Managers which will include training about harassment, sexual harassment and victimisation. Equality training will be provided to staff during their induction process. Refresher training will be provided at least annually. Following the training, the school will survey members of staff attending to ensure they have a clear understanding of the matters covered and the school's expected standards of behaviour. Equality training will emphasise that the school will not tolerate sexual harassment and that acts of sexual harassment may constitute gross misconduct under the school's disciplinary policy which could potentially result in dismissal. The school will ensure that equality training refers to this policy and the school's general Equality Policy.

13.2 Records will be kept of those attending to ensure all staff have attended up to date equality training on a regular basis.

13.3 Line Managers and School Champions (see paragraph 6.1 above) will receive separate training on recognising harassment and sexual harassment and on how to identify and deal with complaints. This will include how to investigate complaints and also how to support staff and others involved.

13.4 The school will raise awareness of this policy through staff inductions, in staff meetings, by posting on the school's website and by referring to it in annual equality training. See also the steps detailed in paragraph 5.1. Senior Leaders will remind staff of the school's policy prior to any events where the risk of sexual harassment increases such as work social events.

13.5 The school will share this policy with third-party organisations supplying workers or services to the school (and will keep records of those with whom it is shared) so third parties know the standards expected of them in their business arrangements with the school.

14. MONITORING AND REVIEW

14.1 The overall effectiveness of this policy and how the school complies with its preventative duty including risk assessments and the training provided to staff will be monitored and reviewed on an annual basis by the Headteacher and the Management Group. The school will do this by using quantitative and qualitative data which will include reviewing any records and outcomes of complaints (including informal complaints) and by carrying out anonymous staff surveys on the effectiveness of the school's policy, the effectiveness of the measures in place, reporting channels and awareness and understanding of how complaints of sexual harassment can be made and will be dealt with by the school.

14.2 The school will also monitor and regularly review all other related school policies, procedures and practices to ensure they take into account the provisions of this policy and the school's preventative duty in relation to sexual harassment and the Equality Act 2010. In the light of reviews, the Headteacher will assess whether they believe any changes to this policy need to be made and will liaise with the school's HR provider as appropriate.

15. PROTECTION AND SUPPORT INCLUDING SUPPORT FOR VICTIMS AND ALLEGED PERPETRATORS

15.1 Any staff member who makes a complaint of sexual harassment or who participates in any investigation under this policy must not suffer from any form of retaliation or victimisation as a result. Any employee found to have retaliated against or victimised someone for making a complaint of sexual harassment will be subjected to disciplinary action in accordance with the school's Disciplinary Policy.

15.2 If a complainant believes they have been victimised they should inform the SLT Equality Lead in the first instance. If the matter cannot be remedied with support from the SLT Lead, the matter will then be passed to the Headteacher for them to discuss the appropriate way forward.

15.3 Victimisation is treating someone badly (subjecting them to a detriment) because they have done or are going to do a "protected act." A protected act will include the following: -

- Making a complaint (whether formally or otherwise) that they have been sexually harassed or that someone else has been sexually harassed (e.g., a colleague or third party connected to the school)
- Helping someone else to make a claim of sexual harassment by giving evidence or information; or
- Giving evidence in relation to a complaint of sexual harassment; or
- Bringing legal proceedings for sexual harassment under the Equality Act 2010
- Giving evidence or information in connection with legal proceedings for sexual harassment under the Equality Act 2010.

15.4 Subjecting someone to a detriment might include (but is not limited to): - rejecting them for promotion or other progression opportunities; unreasonably denying leave requests; socially isolating someone;

denying opportunities to represent the school at external events; being excluded from CPD or other training and development opportunities; being unfairly dismissed.

15.5 Sickness absence due to sexual harassment will be dealt with in accordance with the school's usual attendance management process to ensure appropriate support is provided and to ensure the complainant's health and wellbeing is regularly reviewed. The usual triggers in the school's policy and timeframes for action and escalation may not apply.

15.6 The school will offer access to confidential counselling, usually via its EAP provider, to anyone involved in a sexual harassment complaint, whether that is the complainant, the alleged harasser, a witness or a person involved in the investigation of a complaint under this policy.

15.7 Further support and guidance in relation to sexual harassment complaints can be obtained from the following external organisations: -

- ACAS: www.acas.org.uk
- Protect: www.protect-advice.org
- Samaritans: www.samaritans.org/how-we-can-help/
- Rape Crisis: www.rapecrisis.org
- Equality Advisory and Support Service: www.equalityadvisoryservice.com
- Citizens Advice: www.citizensadvice.org.uk/
- Victim Support: www.victimsupport.org.uk/
- The school's Employee Assistance Programme (EAP)
- **Schools UK** are delighted to announce Sonder as our new EAP (Employee Assistance Program) provider. Sonder are one of the leading EAP providers in the UK, with clients such as Hays, Volvo and McDonalds, to name a few.
- You can access their services by either calling the helpline number or downloading their app for easy online access. Below is a document showing the helpline number and the QR code to download the app for easy access to their services. The other document is a step by step guide once you've downloaded the app.
- Please note that when setting up the Sonder app, you use the same email address that your school has used for the Schools UK software system. You have already been pre-registered for the app and you will be validated once the email address is entered.
- Call: Sonder - 0808 196 7585

Teaching Staff Unions

NEU
John Morgan
07552 854216
JOHN.MORGAN@neu.org.uk

NASUWT
Mike Fenton
michael.fenton@mail.nasuwt.org.uk

NAHT
Jason Ferraby
Jason.ferraby@naht.org.uk

ACSL
Phil Hart
07710 714125
Philip.Hart@ascl.org.uk

Support Staff Unions

Unison
Dawn Warriner (primary)

0161 254 7500
07894 537831
dawn.warriner@manchester.gov.uk

Unite
Jimmy Thornton
j.thornton@manchester.gov.uk

GMB
Michael Clark
michael.clark@gmb.org.uk

The Voice
Steve Fay
stevefay@voicetheunion.org.uk

APPENDIX 1 – DETAILS OF COMPLAINT

Employee Name	
Job Title	
Work Location	
Outline of issues including the name of the alleged harasser, the nature of the alleged harassment, the dates and times when the alleged harassment occurred, the names of any witnesses, any action already taken by you to stop the alleged harassment ***(Please continue on a separate sheet if necessary)***	
Name(s) of any witness(es)	
Supporting documents attached (if any)	
Outcome sought: -	

This form should be submitted to the person appointed to investigate your complaint. You will be contacted within **5 school working days** to arrange an initial investigation meeting to discuss your complaint.

Signature …… Date ……

APPENDIX 2 – APPEAL FORM

APPEAL AGAINST OUTCOME OF COMPLAINT

Please complete this form in full if you are dissatisfied with the outcome of your complaint. You may complete it personally or with your permission, your representative may complete it on your behalf.

Please return this form, together with any supporting documents to the Executive Headteacher/ Chair of the Appeal Committee **within 10 school working days** of the date of the letter advising you of the outcome of your complaint.

You must clearly state why you wish to appeal and specify why you disagree with the outcome of your complaint.

Please note that appeal process will be a review of the decision-making process that led to the outcome of the investigation and will not be a rehearing of all the evidence.

I wish to appeal against the outcome of my complaint because ……
Please continue on a separate sheet if more space is needed.

Signature ……

Date……