



LORDSHIP LANE
PRIMARY SCHOOL

Prevention of Sexual Harassment Policy

Statutory or non-statutory	Haringey Policy adapted for LLPS	Date reviewed	Date of next review
Non-Statutory	Yes	June 2025	Autumn 2026

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1. Overall Aim

1.1 Lordship Lane Primary School is committed to providing a positive work and study experience for all our employees and students which includes a zero-tolerance approach to sexual harassment.

2. Purpose

2.1 This Policy sets out the Lordship Lane Primary School expectations of behaviour by our employees and students and provides approaches for dealing with complaints of sexual harassment. It intends to protect students and employees from inappropriate sexual behaviour which may include, but is not limited to, violence, grooming, misconduct and harassment.

3. Definitions and Scope

3.1 Sexual harassment is unlawful under the Equality Act 2010 ('the Act'). It is also unlawful to treat someone less favourably because they have either submitted a complaint of sexual harassment or have rejected such behaviour. Under the Act sexual harassment is defined as occurring when a person engages in unwanted conduct of a sexual nature that has the purpose or effect of:

- violating someone's dignity, or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

3.2 Sexual harassment includes a wide range of behaviours including but not limited to:

- sexual jokes or anecdotes.
- reference to their sexuality or physical appearance;
- 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.
- standing too close;
- excessively lengthy handshakes;
- intrusive questions about a person's private or sex life and discussing your own sex life.
- unwanted sexual compliments or excessive flirting
- sexual assault.
- sexual posts or contact on social media.
- spreading sexual rumours about a person.
- sending sexually explicit emails or text messages.
- unwelcome touching, hugging, massaging or kissing.
- criminal behaviour, including sexual assault, stalking, grooming, indecent exposure and sending offensive communications.
- Predatory behaviour.
- Coercion.

3.3 Sexual interaction that is invited, mutual and consensual is not sexual harassment because it is not unwanted (i.e behaviour that is based on mutual attraction, friendship and respect is not sexual harassment).

3.4 An individual can experience sexual harassment from someone of the same or different

sex and the recipient of the behaviour decides whether or not it is unwanted.

3.5 Sexual harassment can be a one-off event and does not need to be directed at a person. It can be witnessed or overhead. Sexual conduct that has been welcomed in the past can become unwanted.

3.6 For the purposes of this Policy, 'employees' are defined as any individual either employed or engaged by the School on a paid or unpaid basis to carry out work for the School under any type of employment contract. This includes:

- Students undertaking paid or unpaid work
- People designated as workers for the School including those engaged through the Service Levels Agreement (SLA).
- Agency workers
- A student is considered to be any child registered to study in our School, including summer school and clubs.

3.7 People working on a voluntary basis at the School and those working as contractors are also bound by the terms of this Policy as is any person engaged with, or representing, the School.

3.8 Victimisation of any individual making a complaint under this Policy will not be tolerated and will be dealt with under the School's Disciplinary for Staff or the Student's Behaviour Policy for students.

3.9 Sexual harassment constitutes serious misconduct and could result in dismissal (for employees) or expulsion (for students).

4. Responsibilities

4.1 Governing Body/Senior Leadership Team

- Ensure that they understand and are committed to the rights and entitlements of all employees to attend work and perform their duties, without fear of being sexually harassed in any form.
- Develop an environment of respect within the school
- They understand what constitutes an act of sexual harassment;
- That all reasonable steps are made to eliminate sexual harassment;
- That all employees and volunteers are regularly made aware of their obligations in relation to providing a workplace free from sexual harassment;
- That they provide an environment which discourages harassment and victimisation and set an example by their own behaviour;
- Ensure that all complaints are treated seriously and confidentially;
- Take immediate and appropriate corrective action if they become aware of any offensive action.
- That managers are aware of their obligations and responsibilities in relation to sexual harassment, and the rights and entitlements of their employees and volunteers;
- That training is provided to everyone who works for the School on recognising and understanding sexual harassment.
- That ongoing support and guidance is provided to all employees in relation to the prevention of sexual harassment.
- Ensure that policies are in place and employees are aware. For example
 - disciplinary
 - use of social media
 - dress code

- code of conduct
- data protection (GDPR)

5. Expected Behaviour of Employees

- 5.1** The School believes that the professional relationship of trust and confidence that exists between colleagues and between students and employees is a central and essential part of a student's educational development and pastoral care.
- 5.2** Any abuse of the professional working relationship between employees is unacceptable and could be subject to disciplinary action.
- 5.3** The School recognises that, on occasion, a consensual relationship may also develop between two employees. In such cases both employees must follow the Relationship At Work guidance and the Conflict of Interest Regulations.
- 5.4** The Sexual Offences Act 2003 (Sections 16 to 21) prohibits sexual contact between a person and another person aged under 18 where such a relationship would be an abuse of a position of trust between the parties. This includes situations where the young person is attending an educational institution.

6. Expected Standards of Behaviour for Students

- 6.1** Sexual harassment by a student towards an employee and/or another student will be considered under the School's Behaviour Policy and action taken under this Procedure can include expulsion from the School.

7. Procedures

7.1 Complaint/Grievance Process –

- 7.1.1** Sexual harassment can occur at any level of the School. It can be experienced by both men and women and may involve a co-worker, volunteer, supervisor, manager, service provider, parents/cares. Lack of intent is no defense in sexual harassment cases.
- 7.1.2** Employees or volunteers who believe they are the subject of sexual harassment should take firm, positive and prompt action.
- 7.1.3** If you deem it inappropriate, you should make the perceived harasser(s) aware that you find their behaviour offensive, unwelcome, unacceptable, and that it needs to stop immediately.
- 7.1.4** If the behaviour continues, or if the employee or volunteer feels unable to speak to the person(s) directly, they should contact the headteacher or Line Manager. Alternatively, an employee or volunteer may contact the Chair of Governors or their HR provider or another Manager they feel comfortable with. They may also wish to seek support from their Trade Union or professional association where they are a member. All such support is offered on a confidential basis.
- 7.1.5** The Manager will provide support and ascertain the nature of the complaint and the wishes of the complainant.
- 7.1.6** The complainant does not have to request a full formal investigation if they will be

satisfied by less formal treatment of the issue.

7.2 Informal Intervention

- 7.2.1** Informal intervention may be undertaken through a process of mediation or conciliation. During informal intervention the alleged harasser will be made aware of the allegations being made against them and given the right to respond.
- 7.2.2** This procedure will be complete when the complainant and the respondent come to an agreement on the procedure to be followed. A record will be kept of the resolution.

7.3 Formal Complaints Procedure

- 7.3.1** Proceeding with a formal grievance requires the consent of the person complaining, particularly as witnesses or senior management may become involved.
- 7.3.2** The formal procedure will be coordinated by the headteacher or chair of governors, who will be guided by the Human Resources Adviser. The Human Resources Adviser does not need to know the specific details of the sexual harassment case to provide this guidance.
- 7.3.3** The headteacher should clarify the grievance and obtain a step-by-step account of the incident. More than one interview may be necessary.
- 7.3.4** The headteacher will document all such interviews accurately and avoid irrelevant information. Relevant information will include parties involved, timing, location, and nature of conduct complained against.
- 7.3.5** Records are to be kept and filed in a confidential and secure place. If no confidential area is available, these notes may be sealed and forwarded to the Human Resources provider, where they will be maintained in a confidential filing system. These records should be kept for a period of seven years. Under no circumstances will records be placed on the complainant's personnel file.
- 7.3.6** The headteacher or chair of governors will organise an investigation, which in most cases may involve but is not limited to:
- A private interview to ascertain the facts and what the complainant expects to happen as a result of making the complaint;
 - An interview with the alleged harasser(s) to ascertain their defense;
 - Interviews with other employees, volunteers or individuals who may be able to assist with the complaint;
 - Examination of any relevant documents;
 - Determination of previous behaviours or issues.
 - Review any records kept by the person claiming to have been harassed;
 - Information on the absence of evidence where it should logically exist.
- 7.3.7** On completion of the investigation, the headteacher or chair of governors will determine a course of action to be taken. In most cases this will involve guidance from the Human Resources Adviser.
- 7.3.8** Sexual harassment may also lead to a criminal investigation being instigated into the actions of an employee or student. Where there are concerns that a criminal act has taken place, advice must be taken from the school's Human Resources provider.

8. Outcomes

This will depend upon factors such as:

- The severity and frequency of the harassment;
- The weight of the evidence;
- The wishes of the person who was harassed;
- Whether the harasser could have been expected to know that such behaviour was a breach of policy;
- The level of contrition;
- Whether there have been any prior incidents or warnings.

9. Possible course of actions

This may include, but not be limited to, any combination of the following:

- Counselling.
- Disciplinary proceedings against the harasser (outcome to be noted in the respondent's personnel file).
- Disciplinary action against the person who complained if there is strong evidence that the complaint was vexatious or malicious.
- Formal apologies and undertaking that the behaviour will cease.
- Conciliation/mediation conducted by an impartial third party where the parties to the complaint agree to a mutually acceptable resolution.
- Reimbursing any costs associated with the harassment.
- Re-crediting any leave taken as a result of the harassment.

10. Notification of Outcome

- The headteacher or chair of governors will advise all relevant parties of the outcome within 5 working days.
- If the investigation determines that sexual harassment has occurred, the headteacher or chair of governors must forward a summary of the complaint and the action taken to the Human Resources provider. A copy may be placed in the respondent's personnel file.

11. Where there is Insufficient Evident

If there is insufficient proof to decide whether or not the harassment occurred, the headteacher or chair of governors will:

- Remind those involved of expected standards of conduct.
- Conduct further training and awareness-raising sessions for staff and volunteers.
- Monitor the situation carefully.

12. On-going actions

- The headteacher or chair of governors will monitor the outcome to ensure that the offensive behaviour has ceased, and that neither party has been victimised. This may involve follow-up interviews.
- If there has been any substantiated victimisation, disciplinary procedures will be followed against the perpetrator.

13. Confidentiality

Confidentiality will be maintained, subject to any requirement to involve external agencies where a criminal offence may have been committed or where maintaining confidentiality would pose a risk to the person making the report, or to others.

14. Support and Advice for Employees

There are many sources of support available to employees prior to making a complaint or to both complainant and alleged perpetrator once a complaint has been made. These include:

- Union representatives (for union members)
- School's HR provider
- Employee Assistance Programme (EAP)
- Sexual Harassment at Work - legal advice telephone helpline provided by charity [Home | Rights of Women](#)
- ACAS - [What sexual harassment is - Sexual harassment - Acas](#)