



# Walthamstow School For Girls

*"Neglect not the gift that is in thee"*

## Policy Document

# Prevention of Sexual Harassment Policy

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## 1. INTRODUCTION

1. Our school is committed to providing a safe, inclusive and supportive work environment free from sexual harassment and ensuring the safety and dignity of all employees. All teachers and educational professionals have specific protection at work from sexual harassment under the Equality Act 2010. Sexual harassment and victimising staff who report sexual harassment is unlawful and will not be tolerated. This policy outlines our commitment to preventing and addressing sexual harassment in the workplace.
2. The Worker Protection (Amendment of Equality Act 2010) Act 2023, requires employers to take "reasonable steps" to prevent sexual harassment in the workplace, and to be proactive rather than reactive.
3. Sexual harassment can have severe consequences for individuals and the school, including loss of morale, poor work performance, impact on wellbeing and ill health, increased turnover of staff, legal claims, and damage to our reputation.
4. Building on the good work already being undertaken in our school regarding low-level concerns, we will take reports of sexual harassment seriously and address them promptly and confidentially. Sexual harassment by an employee may be considered gross misconduct, which could result in dismissal without notice and pay, under our Disciplinary Procedure. Acts of sexual harassment may also amount to a safeguarding concern and may also require consideration of transferable risk under Keeping Children Safe in Education (KCSIE).
5. Whilst any action in response to conduct amounting to sexual harassment will depend on the facts and circumstances, the school is committed to taking and enforcing a zero-tolerance approach of sexual harassment towards its staff.
6. Any report of sexual harassment, including incidents perpetrated by third parties or school staff, will be initially addressed in accordance with this policy.
7. Our school will ensure that whenever management receives a complaint of sexual harassment or otherwise becomes aware of possible sexual harassment, they will keep the investigation confidential as far as is reasonably possible. All staff at all levels of the school are required to cooperate with any investigation of sexual harassment. Upon receipt, we will also assess whether the allegation constitutes a low-level concern or meets the threshold for reporting as a safeguarding concern under KCSIE, in addition to determining whether transferable risk is a factor that needs to be considered.

## 2. SCOPE AND PURPOSE OF THIS POLICY

1. This Policy covers the prevention of sexual harassment that may take place within and/or outside of the workplace in the course of employment or engagement, including but not limited to working from home, school trips, at work-related events or social functions, on social media, or an outside of work situation where the incident is relevant to a person's suitability to carry out their role.
2. This Policy sets out a framework for line managers to deal with sexual harassment, and it applies to:
  - all staff, including employees, irrespective of seniority, service, working hours, or type of contract of employment (permanent, fixed term or temporary), consultants, apprentices, volunteers, those undertaking work experience, agency workers
  - third parties interacting with those listed in section 1 such as pupils, parents, suppliers or visitors to the premises.
3. This policy does not form part of an employee's contract of employment, and it may be amended at any time. Walthamstow School for Girls may also vary the application of this procedure, including any timescales for action, as appropriate.

4. The Governing Body has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the Headteacher. Suggestions for change should be reported to the Headteacher or School Business Manager.
5. If you have any questions about this policy, please direct them to your line manager initially. Alternatively, you may also refer questions about the operation of this policy or any concerns to the Headteacher or School Business Manager.

### **3. UNWANTED CONDUCT: WHAT IS SEXUAL HARASSMENT?**

1. Sexual harassment is unwanted conduct on grounds of sex or of a sexual nature. It can be physical, verbal or non-verbal, and it has the purpose and/or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
2. Sexual harassment covers a range of conducts, which can include but are not limited to the following:
  - Unwelcome sexual advances or suggestive behaviour, which the alleged harasser may or may not perceive as harmless, including but not limited to:
    - Suggestive looks, staring, or leering.
    - Sexual propositions.
    - Requests or demands for sexual favours
    - Sexual gestures.
    - Sexual comments, stories, or jokes.
  - Comments on someone's appearance that include explicit sexual references or have sexual undertones and implications.
  - Intrusive questions about a person's private or sex life, or a person discussing their own sex life without a clear invitation to do so.
  - Posting and/or sharing offensive social media and/or internet content of a sexual nature.
  - Sending, displaying, and/or circulating material of a sexual nature, including but not limited to emails, text messages, WhatsApp messages, video clips, and images sent by mobile phone or posted on the internet.
  - Initiating or spreading sexual rumours about a person.
  - Unwanted physical conduct or "horseplay", including unwelcome touching, hugging, massaging, patting, pinching, pushing, grabbing, or kissing.
  - Continually asking for and/or suggesting sexual activity after it has been made clear that the questions and/or suggestions are not welcome.
  - Wolf-whistling and catcalling.
  - Treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.
3. Anyone can experience sexual harassment, regardless of their sex and the sex of the alleged harasser. It can be carried out by men, women and people of any gender identity or sexual orientation.
4. The school will consider any aggravating factors, for example abuse of power by a senior employee over a more junior colleague, and/or previous harassing behaviour by the harasser, and intersecting forms of harassment such as racialised sexual harassment and sexual harassment targeted at LGBTQ plus people, when deciding what is the appropriate disciplinary action to take.

### **4. PURPOSE OF EFFECT OF UNWANTED CONDUCT**

1. If unwanted conduct is intended to violate a person's dignity or create an offensive environment, the effect that it has on the individual is irrelevant. This is because the alleged harasser's intention alone can establish the offence, regardless of the actual impact on the victim. This principle emphasises that the mere act alone is sufficient to be considered sexual harassment.

2. Conduct can have the effect of violating a person's dignity or create an offensive environment and so can amount to sexual harassment regardless of whether the alleged harasser intended for this outcome.
3. Conduct does not need to be explicitly objected to, to be considered unwanted.
4. Unwanted conduct can occur as a single instance and does not need to be repeated to constitute sexual harassment.
5. Conduct does not have to be specifically directed at an individual to constitute sexual harassment, as it may still create an intimidating, offensive, or degrading environment for them.
6. Sexual conduct that was previously welcomed can become unwanted conduct amounting to sexual harassment at any time.

## 5. ACTIVE PREVENTION OF SEXUAL HARASSMENT

1. The school recognises that employers are required by law to take reasonable steps to prevent sexual harassment of employees in the course of their employment. The school recognises that whilst there is no prescribed minimum on what an employer can do to prevent sexual harassment at work, there are reasonable steps that can help prevent sexual harassment, including but not limited to the following:
  - Ensuring that the Preventing Sexual Harassment at Work Policy is in place, regularly reviewed and well communicated to all, including publishing the policy on the school website.
  - Ensuring that all policies are cross-referenced and interact well with the Preventing Sexual Harassment at Work Policy.
  - Ensuring that the effectiveness of policies is evaluated through means such as centralised records allowing trends to be analysed, anonymous staff surveys, and asking questions to obtain an accurate picture of sexual harassment within the workplace.
  - Ensuring that proactive opportunities are provided to workers to disclose or raise issues about sexual harassment, such as but not limited to sickness or return-to-work meetings, one-on-ones, performance meetings, and exit interviews.
  - Providing training to Line Managers on how to handle a sexual harassment complaint.
  - Ensuring that all staff members understand how to report sexual harassment that they may have experienced or witnessed, as well as the process to follow if they are made aware of it.
  - Operating a zero-tolerance workplace culture in relation to sexual harassment.
  - Undertaking risk assessments concerning sexual harassment, identifying the risks, including power imbalances and the control measures necessary to minimise them.
  - Promoting a culture of transparency where staff feel empowered and are encouraged to speak up by providing both formal and informal channels to report sexual harassment without the fear of repercussions.
  - Ensuring that amongst its staff, reasonable steps will be taken to prevent sexual harassment and pre-emptively educate by
    - Providing regular anti-sexual harassment training to all staff.
    - Ensuring this policy is readily available and accessible to all staff.
    - Communicating the steps that will be taken in response to a report of sexual harassment and outlining the possible outcomes. For example, warning a colleague about their behaviour, banning the employee from attending events, reporting any criminal acts to the police, or sharing information in line with our statutory duty.
2. We will consider at an early stage whether a report of sexual harassment amounts to a potential criminal offence and whether the police should be informed. Sexual harassment amounting to a criminal offence may include, but is not limited to, sexual assault, indecent exposure, voyeurism, stalking, and offensive communications.
3. The decision to inform the police will belong to the employee, unless the school considers that there is a serious and immediate risk of harm to the employee or another individual, in which case it is likely that the concern will amount to a safeguarding concern under KCSIE and will need to be

reported to the LADO by the school. The LADO will follow their procedures in considering what other agencies, if any, to inform.

4. A decision to inform the LADO and/or police of a report of sexual harassment will not be taken lightly, and we will seek the employee's cooperation in advance of doing so where possible. If the LADO / police do become involved, the school will liaise with the LADO / police regarding our internal investigation into the report of sexual harassment and any subsequent disciplinary process in order to prevent any prejudice to any criminal investigation and/or legal proceedings.

## **6. THIRD PARTIES**

1. The school will inform third parties of this policy and ensure it is readily available and accessible to all.
2. This policy makes clear that the school will not tolerate sexual harassment of its staff and sets out the actions that we may take if a third party sexually harasses a staff member, including speaking with or writing to the alleged third party harasser or their superior (or both) about their behaviour, banning the alleged third party harasser from school premises (including parents and family members), banning the alleged third party harasser from working within or for the school, banning the third party organisation and persons employed by the third party from premises, events, meetings, or contacting employees, terminating any business relationship with the third party, reporting criminal acts to the police (please see Section 5.3 of this policy for further detail), or sharing the information in line with any statutory or regulatory duty.
3. The school will be proactive about preventing and addressing sexism, sexualised behaviour and incidents of sexual harassment from students towards each other or staff as part of the student behaviour and safeguarding processes.
4. Incidents of sexual harassment or of a sexist nature against staff will be recorded as such, not as generic bullying.

## **7. REPORTING SEXUAL HARASSMENT**

1. If you are unsure whether an incident or series of incidents constitutes sexual harassment, you should initially contact your line manager informally for confidential advice and support. If the reported concern is about your line manager, you should refer it to the Headteacher.
2. Anyone can disclose sexual harassment. There are various ways to do this:
  - Speaking with their Line Manager.
  - Speak with a member of the HR team.
  - Speaking with a Governing Body.
  - Speak with the Headteacher.
3. Via any of the processes listed above, the person listening to the individual making a report of sexual harassment may ask questions to establish the facts and document the answers.
4. The listener should guide the individual making the report to review Sections 8 and 9 of this policy. This will help them understand the available options and determine the most suitable course of action regarding the disclosed matters.
5. Should the individual reporting sexual harassment wish to raise a formal complaint, they should submit this in writing setting out the full details of the conduct or behaviour in question, including the name of the alleged harasser, the nature of the sexual harassment, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it or prevent it from happening. The written document may assist the reporter if they wish to avoid repeating their concerns verbally throughout the investigation process.

6. *If you experience sexual harassment or victimisation:*
  - Staff who experience sexual harassment or victimisation are encouraged to take appropriate steps to address it and will be supported where they do so.
7. *If you witness sexual harassment or victimisation:*
  - Staff who witness sexual harassment or victimisation are encouraged to take appropriate steps to address it and will be supported where they do so. Depending on the circumstances, this could include:
    - Intervening where you feel able to do so.
    - Supporting the victim to report it or reporting it on their behalf.
    - Reporting the incident when they feel there may be a continuing risk if it is not reported.
    - Co-operating in any investigation into the incident.
8. All individuals reporting concerns and witnesses will be provided with appropriate support and will be protected from victimisation.

## **8. INFORMAL STEPS TO ADDRESS REPORTED CONCERNS OF SEXUAL HARASSMENT**

1. If you are being sexually harassed and feel able and safe to do so, you may consider raising the issue initially with the person responsible. This will enable you to have the opportunity to directly explain to the person why their behaviour is unwelcome and considered unacceptable, how it made you feel, and that it is unwanted conduct that you want to stop.
2. This direct approach is not an expectation of the school, which will ensure that support is available if you prefer not to approach the person responsible directly but would rather an informal approach, such as involving an appropriate manager or other staff member who can advocate for you.
3. If informal steps have not been successful or are not possible or are not appropriate, you can raise a formal concern following the procedure detailed in Section 9. You can also raise a formal concern if you want to report sexual harassment as a witness.

## **9. RAISING A FORMAL CONCERN OF SEXUAL HARASSMENT**

1. If you wish to report a concern about sexual harassment formally, you should inform the Headteacher whose role is to ensure that your concern is fully investigated, and further action taken where appropriate. If the reported concern is about the Headteacher, you should refer it to the Chair of Governors, who will record your reported concern in writing for the investigation process.
2. Once you have formally reported your concern, it will remain confidential between you and the Headteacher until you decide how to proceed with the matter and decide whether you wish to have the reported concern investigated further.
3. In general, whilst it is up to you to decide how you want to progress the matter, the school has a duty to prevent sexual harassment and to report matters that could amount to a safeguarding concern under KCSIE to protect all staff, and will pursue the matter if, in all the circumstances, we consider it appropriate to do so. These circumstances may include situations where there is a risk to your safety or the safety of others. If the school decides to take further action despite your wishes, we will explain our decision and ensure that we have put in place appropriate safeguards to prevent you from being further harassed or victimised and arrange support to deal with any impact the decision may have on you.

## **10. FORMAL INVESTIGATIONS**

1. We have a duty to conduct a fair investigation from the perspective of all parties concerned, including the reporter of the concern, any witnesses, and the alleged harasser. It is essential that the alleged harasser is provided with full details of the reported concern made against them, as it will otherwise be very difficult for them to respond fully without knowing who has accused them. In

exceptional circumstances, where the reporter and/or a witness has a genuine fear of reprisals, an investigator may agree that a written report of concerns of sexual harassment and/or a witness statement can be anonymised.

2. We will investigate reports of sexual harassment in a timely, respectful and confidential manner. Wherever possible, the investigation will be conducted by an appropriate person who is senior to the alleged harasser and who has had no prior involvement in the report. An external investigator may be appointed if the circumstances require the organisation to appoint an individual from outside of the school to conduct the investigation. The investigation will be thorough, impartial, and objective and carried out with sensitivity and due respect for the rights of all parties concerned.
3. The school will ensure that investigators and any individuals involved in the investigation process are suitably trained in advance to understand the sensitivities of sexual harassment and are encouraged to adopt a trauma-informed approach to investigation and decision-making.
4. We will arrange a meeting with you, typically within five working days of receiving your report, to hear your account of the events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation. The investigator will arrange further meetings with you as appropriate throughout the investigation.
5. Please refer to Section 7.5 regarding the use of an initial fact-finding document for this purpose. As far as possible, you will be kept updated on the timescales for the investigation process by the Investigating Officer. The Investigating Officer will not provide any further details at this stage regarding the investigation. If the Investigating Officer is an external third party, the Headteacher will liaise with them to determine if they can provide an update on the investigation's timescales.
6. Where your report concerns an employee, we may need to consider whether suspension of the alleged harasser is necessary on full pay or whether other temporary changes to working arrangements are required pending the outcome of a suspension risk assessment, if circumstances necessitate it and there is no alternative to suspension. If the school decides to suspend or make temporary changes to the alleged harasser's working arrangements whilst an investigation process is ongoing, this does not constitute disciplinary action against them. Any suspension or temporary changes to working arrangements will be frequently reviewed to consider whether it is necessary and/or proportionate in the circumstances.
7. The investigator will meet with the alleged harasser, who may also be accompanied by a colleague or trade union representative of their choice, to hear their account of events. They have a right to be informed about the details of the reported concerns regarding them, so that they can respond. See Section 10.1.
8. You, the alleged harasser, and any witnesses to any of the incidents and behaviours in the reported concern will be instructed not to discuss the matter with anyone else, unless you or they have been authorised to do so. Confidentiality is crucial during the investigation, and any breach of confidentiality may result in disciplinary action.
9. Where your report is about someone other than an employee, such as a third party e.g., a contractor, parent, visitor, agency staff etc. we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the school and the rights of that person. Where appropriate, we will discuss the matter with the third party.
10. We will also consider any request that you may make for temporary changes to your own working arrangements during the investigation. For example, you may request changes to your duties, work location, or working hours.
11. At the end of the investigation, the investigator will submit a report to the Headteacher, who will then consider the outcome and determine any further action required as appropriate.

12. They will arrange a meeting with you, usually within five days of receiving the report, to discuss the outcome and determine what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting.

## **11. ACTIONS FOLLOWING THE INVESTIGATION**

1. If the Headteacher considers that sexual harassment occurred, prompt action will be taken in response. Further consideration will be given at this point to whether the conduct constitutes or continues to constitute a reportable safeguarding concern under KCSIE, as well as any transferable risks that may require consideration under KCSIE.
2. Where the alleged harasser is an employee, the matter may be dealt with as a case of potential misconduct or gross misconduct under our Disciplinary Procedure.
3. Where the alleged harasser resigns partway through an investigation or following the investigation, the school will consider whether it is appropriate in the circumstances to proceed to a disciplinary hearing in the alleged harasser's absence. If the concerns have been assessed as amounting to a reportable safeguarding concern under KCSIE, the process will be completed to determine one of the five outcomes under KCSIE. In any event, the Headteacher will arrange a meeting with the person who has reported the concerns to provide an update and to discuss the next steps.
4. Where the alleged harasser is a third party, appropriate action might include speaking or writing to the person and/or their superior/employer about their conduct, or, in appropriate cases, banning the person from the premises or terminating our contract with them or their employer.
5. Whether or not your report of sexual harassment is upheld, and if the alleged harasser has not been dismissed due to the reported concern, we will consider how best to manage any ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of facilitated conversation, mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties by agreement.
6. You will not be disciplined or treated detrimentally merely because you have reported a concern of sexual harassment or if your reported concern was not upheld. Should there be evidence that indicates a staff member has deliberately provided false information or acted dishonestly during an investigation, they may be subject to action under our Disciplinary Procedure.

## **12. APPEALS**

1. If the person reporting the concern is not satisfied with the outcome of an investigation, they may appeal in writing to the Chair of Governors, stating their complete grounds of appeal, within five working days of the date on which the decision was sent or given to them.
2. We will endeavour to hold an appeal meeting within 10 working days of receiving your written appeal. The appeal hearing will be conducted by a Committee of the Governing Body that has not previously been involved in the case (although they may ask anyone previously involved to be present). You may bring a colleague or trade union representative to the appeal meeting.
3. The appeal hearing will not be a re-hearing of all the evidence reviewed during the investigation. It will be a review of the decision-making process that led to the outcome of the investigation.
4. We will confirm our decision on your appeal in writing, usually within five working days of the appeal hearing. This concludes the internal procedure, and there is no further right of appeal.

## **13. PROTECTION AND SUPPORT FOR THOSE INVOLVED**

1. A staff member who reports a concern of sexual harassment or who participates in any investigation conducted under this policy must not suffer any form of retaliation or victimisation as a result of reporting a concern. Anyone found to have retaliated against or victimised someone in this way may be subject to a disciplinary process, subject to the provisions set out in Section 11.6.
2. Victimisation is subjecting a person to a detriment because they have:
  - Complained (whether formally or otherwise) that someone has sexually harassed them or someone else such as another staff member or third party connected to the employer.
  - Supported someone to make a report of sexual harassment.
  - Given evidence about a reported concern of sexual harassment.
  - Brought legal proceedings for sexual harassment under the Equality Act.
  - Given evidence or information in connection with legal proceedings for sexual harassment under the Equality Act.
3. Victimising a person may include, but is not limited to:
  - Unreasonably denying their requests at work, for example, annual leave requests.
  - Unreasonably denying them opportunities at work, for example, promotions.
  - Bullying behaviour, such as intimidation, mockery, rudeness, and/or dismissiveness.
  - Socially isolating them so they do not have the confidence to raise a grievance.
  - Unfairly dismissing them.
4. If you believe you have been subjected to any such treatment, you should inform the Headteacher. If you feel that the matter is not remedied to your satisfaction, you may raise it formally using the channel outlined within Section 9 of this Policy or via the Grievance Procedure if you wish.
5. Anyone found to have retaliated against or victimised someone for making a report of sexual harassment or assisting with an investigation under this policy may be subject to our Disciplinary Procedure.
6. If a report is made about your behaviour or conduct, it is important not to automatically dismiss it because you were merely joking or that the reporter is overly sensitive. Recognise that individuals have diverse perceptions of acceptable conduct, and it is the right of every individual to define what is acceptable to them. It is important to respect these boundaries and to contribute to maintaining a work environment that is free from any form of sexual harassment. You may have unintentionally offended someone. If that is the case, the person concerned may be content with an explanation, an apology, and an assurance that, as you understand that the conduct and/or behaviour was unwanted, you will be careful in the future not to behave in a way that may offend.
7. We have access to confidential counselling, which is available via Educational Mutual, for anyone who may be affected by or accused of sexual harassment. Please get in touch with the School Business Manager if you require these details.
8. Support and guidance can also be obtained from the following external services:
  - The Equality Advisory and Support Service ([www.equalityadvisoryservice.com](http://www.equalityadvisoryservice.com))
  - Protect ([www.protect-advice.org.uk](http://www.protect-advice.org.uk))
  - Victim support ([www.victimsupport.org.uk](http://www.victimsupport.org.uk))
  - Rights of Women (England and Wales) ([www.rightsofwomen.org.uk](http://www.rightsofwomen.org.uk))
  - ACAS ([www.acas.org.uk](http://www.acas.org.uk))
  - Equality and Human Rights Commission ([www.equalityhumanrights.com](http://www.equalityhumanrights.com))
  - Education Support helpline - free and confidential emotional support for teachers and education staff - [www.educationsupport.org.uk](http://www.educationsupport.org.uk)

## 14. TRAINING

1. Employers must provide mandatory training to all staff on what sexual harassment is and the standards of behaviour expected.
2. Managers need specific training on how to handle complaints of sexual harassment effectively.

3. All new staff must attend equity, diversity and inclusion training as part of their induction programme.
4. All current employees and workers must attend regular equity, diversity, and inclusion training on an annual basis.
5. We expect all our staff to proactively support our equity, diversity and inclusion initiatives by attending events and workshops to educate themselves on the challenges faced by others and ways to help prevent and alleviate these issues in the workplace.

## **15. CONFIDENTIALITY AND DATA PROTECTION**

1. Confidentiality is a crucial aspect of the procedures outlined in this policy. Everyone involved in the operation of the policy, whether making a report or participating in any investigation, is responsible for maintaining the high level of confidentiality required. Details of the investigation and the names of the person making the complaint and the person accused must be disclosed only on a "need-to-know" basis.
2. As part of implementing this policy, the school may collect, process, and store personal data in accordance with our Data Protection Policy. We will comply with the requirements of Data Protection legislation (UK General Data Protection Regulation & the Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time. Records will be kept on the employee's personal file in accordance with our Workforce Privacy Notice, Retention and Destruction Policy, and the requirements of Data Protection legislation. This will include information about the complaint, along with a record of the outcome and any notes or other documents compiled during the process.
3. As previously stated in Section 10.8. A breach of confidentiality may result in disciplinary action under our Disciplinary Policy and Procedure.

## **16. REVIEW OF THIS POLICY**

1. This policy is reviewed and amended frequently by school leaders. We will monitor the application and outcomes of this policy on an annual basis to ensure it is working effectively. This includes but is not limited to the following:
  - Providing refresher training to line managers.
  - Providing refresher training to all staff.
  - Conducting one-to-one sessions with Line Managers and staff regarding the application and outcomes of the policy.
  - Conducting anonymous staff and student surveys in order to monitor the rate of incidents of sexual harassment among staff and students.
  - Updating this Policy in response to changes in law, regulatory requirements, and best practices.