MOORE Kingston Smith

Sexual harassment and third-party harassment



Risk assessment guide and action plan

A practical, venue-specific template for hospitality businesses

Document information	Complete below
Organisation	
Venue / site	
Assessment owner	
Assessment date	
Approval date	
Next review	
Version	

This is a guided assessment, not an exhaustive list of every possible incident. Select the themes that apply, add venue-specific risks and record evidence for controls genuinely operating in practice.

1. Using this guide

From operating context to completed actions.

Purpose

Use this guide to identify where harassment could arise in the way the business operates, assess current controls and agree proportionate action. It is not necessary to score every prompt or predict every possible incident.

Stage	What to do	Output
1. Profile	Describe the operation, workforce and higher-exposure activities.	Business profile
2. Review	Examine data and consult people who understand the work.	Evidence record
3. Assess	Select themes, describe actual exposure and score current risk.	Risk assessments
4. Act	Transfer gaps and further controls into one action plan.	Owned actions
5. Review	Test effectiveness and reassess residual risk.	Review record

Ground rules

- Use evidence rather than assumption.
- Record only controls that are implemented and understood.
- Consider normal operations, peak trading, events and unusual activities.
- Consult a representative mix of workers.
- Take immediate action where a serious or uncontrolled risk is identified.

2. Business and workforce profile

Establish the context before selecting risks

The same template should not produce the same answer for every business. Record the operating factors that shape this assessment.

Profile question	Response / notes
Type of operation	☐ Hotel ☐ Restaurant ☐ Pub/bar ☐ Café ☐ Events ☐ Leisure ☐ Other
Services and higher-exposure activities	
Trading hours and late-night operation	
Alcohol service and private functions	
Customer-facing roles	
Lone, isolated or mobile work	
Agency, casual and seasonal workforce	
Young or inexperienced workers	
Employer-provided accommodation	
Contractors, suppliers and entertainers	
Security, CCTV and incident response	
Digital channels used for work	

Circumstances requiring closer consideration

Note any circumstances that may increase exposure, create a power imbalance or reduce confidence in speaking up.

3. Evidence and consultation

Base assessment on what happens in practice

Information reviewed	Period / date	Key themes or patterns	Action?
Formal complaints and grievances			
Informal concerns and manager logs			
Investigation and disciplinary records			
Employee surveys / pulse checks			
Exit interview feedback			
Customer complaints / incident logs			
Agency / contractor feedback			
Operational and security observations			

People consulted	Method / date	What did they tell us?	How did this inform the assessment?
Employees			
Managers / supervisors			
Agency / seasonal workers			
Employee / union representatives			
People / HR team			

4. Scoring the risk

Score after taking existing controls into account

Score	Likelihood	Guide
1	Rare	Exceptional circumstances only
2	Unlikely	Could occur, but is not expected
3	Possible	Could occur in some circumstances
4	Likely	Expected in relevant circumstances
5	Almost certain	Expected repeatedly or frequently

Score	Impact	Guide
1	Minor	Limited harm; promptly resolved
2	Moderate	Noticeable harm or disruption
3	Significant	Material harm, complaint or wider impact
4	Major	Serious harm or sustained impact
5	Severe	Severe or lasting harm

Score	Rating	Response
1–4	Low	Maintain and monitor
5–9	Medium	Improve within a planned timescale
10–15	High	Prioritise action and interim protection
16–25	Critical	Act immediately

Editable 5 × 5 risk-rating matrix

Enter or shade the relevant cell when agreeing to a score. Each cell shows likelihood × impact. The matrix remains fully editable in Word.

	Impact →	1 Minor	2 Moderate	3 Significant	4 Major	5 Severe
5 Almost certain	Likelihood	5 MEDIUM	10 HIGH	15 HIGH	20 CRITICAL	25 CRITICAL
4 Likely	Likelihood	4 LOW	8 MEDIUM	12 HIGH	16 CRITICAL	20 CRITICAL
3 Possible	Likelihood	3 LOW	6 MEDIUM	9 MEDIUM	12 HIGH	15 HIGH
2 Unlikely	Likelihood	2 LOW	4 LOW	6 MEDIUM	8 MEDIUM	10 HIGH
1 Rare	Likelihood	1 LOW	2 LOW	3 LOW	4 LOW	5 MEDIUM

Editable scoring worksheet

Use this table during the assessment discussion. Add rows where more than one exposure sits within the same risk theme.

Risk theme / exposure	Existing controls considered	Likelihood 1–5	Impact 1–5	Current score	Further controls	Residual L / I	Residual score

Current risk = likelihood × impact after existing controls. Residual risk = expected score after further controls are completed and tested.

5. Risk themes 1–3

Complete only where relevant to this operation

1. Customers, guests and visitors

Prompts: Alcohol; private spaces; tips; requests for details; unwanted comments or contact.

How to use the worked examples

The amber examples below show illustrative entries for a fictional hospitality venue. They demonstrate the level of specificity expected. Replace or delete them when completing the assessment. A blank row is retained beneath each example for the organisation's own entry.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Waiting and bar staff have regular contact with guests, including intoxicated customers during Friday and Saturday evening service. Concerns have included sexual comments and requests for personal contact details.	Anti-harassment policy; manager on duty; incident log; CCTV in public areas; staff told to escalate concerns. Evidence: training records and incident log reviewed.	4	3	**12 high**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Introduce a guest behaviour statement in booking confirmations and at the venue; issue manager intervention guidance; brief staff that service may be refused and support is available.	Operations Manager 30 Nov 2026	2	3	**6 medium**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

2. Workplace culture and colleague conduct

Prompts: Banter; sexualised language; blurred boundaries; failure to challenge.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Informal language and sexualised “banter” is sometimes heard in the kitchen during busy shifts. New starters may be reluctant to challenge established colleagues.	Code of conduct; induction; grievance route; annual training. Evidence: policy acknowledgement and training attendance records.	3	3	**9 medium**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Run team-based behavioural standards briefing; coach supervisors on early intervention; include a culture question in the next pulse survey.	Head Chef / HR 31 Dec 2026	2	3	**6 medium**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

3. Management conduct and power imbalance

Prompts: Control over shifts, tips, probation or progression; fear of repercussions.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Supervisors influence rotas, overtime, probation feedback and access to favourable shifts. Workers may worry that raising concerns could affect hours or progression.	Grievance and whistleblowing routes; HR contact outside the reporting line; manager code of conduct; disciplinary procedure.	3	4	**12 high**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Publicise alternative reporting routes; train managers on boundaries and victimisation; conduct confidential check-ins with new starters during probation.	People Manager 30 Nov 2026	2	4	**8 medium**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

6. Risk themes 4–6

Complete only where relevant to this operation

4. Alcohol, events and functions

Prompts: Peak periods; celebrations; weddings; conferences; intoxication.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Weddings, Christmas events and staff celebrations involve extended alcohol service, crowded areas and contact with intoxicated guests or colleagues.	Premises licence controls; event manager; security for larger events; CCTV; pre-event operational briefing.	4	3	**12 high**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Add harassment response to event briefings; name the manager responsible for welfare; define when security intervenes and when a guest is removed.	Events Manager Before next event	2	3	**6 medium**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

5. Lone, isolated and late-night work

Prompts: Opening and closing; bedrooms; cellars; kitchens; travel home.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Housekeeping staff may enter occupied bedrooms alone. Closing staff may leave after midnight and cross poorly supervised back-of-house areas or car parks.	Room-entry procedures; radios; duty manager contact; CCTV in corridors and entrances; closing checklist.	3	4	**12 high**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Introduce occupied-room escalation protocol; review lone-closing arrangements; provide check-out confirmation and safe-travel escalation route.	Rooms / Duty Manager 31 Dec 2026	2	4	**8 medium**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

6. Agency, casual, seasonal and young workers

Prompts: Short induction; insecure hours; unfamiliar reporting routes.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Seasonal and agency staff may receive a shortened induction, may not know internal contacts and may be less confident raising concerns about managers or guests.	Site induction checklist; agency terms; named supervisor; policy available on staff portal.	3	3	**9 medium**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Create a 10-minute site briefing covering standards and reporting routes; provide QR access to reporting information; seek agency worker feedback after peak periods.	HR / Site Manager Before next intake	2	3	**6 medium**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

7: Risk themes 7–9

Complete only where relevant to this operation

7. Digital communications and social media

Prompts: WhatsApp; direct messages; images; out-of-hours contact.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Work rotas and shift changes are discussed in WhatsApp groups. Personal messages and images may be sent outside working hours using private numbers.	Social media and acceptable-use policies; manager oversight of official groups; disciplinary procedure.	3	3	**9 medium**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Move operational messages to an approved work channel where practicable; publish group rules; provide a route to report private messages connected with work.	Operations / IT 31 Jan 2027	2	3	**6 medium**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

8. Third parties and external relationships

Prompts: Contractors; suppliers; drivers; entertainers; security; clients.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Delivery drivers, contractors, entertainers and security staff have direct contact with employees, including in back-of-house areas with limited supervision.	Signing-in process; contractor terms; named site contact; incident escalation route.	2	3	**6 MEDIUM**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Add behavioural expectations and consequences to supplier onboarding; brief regular contractors; record and escalate concerns to the supplier employer.	Procurement / Venue Manager 31 Jan 2027	1	3	**3 LOW**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

9. Accommodation, travel and private spaces

Prompts: Staff accommodation; hotel rooms; transport; changing facilities.

Actual exposure	Existing controls and evidence	L	I	Current score
Worked example: Shared staff accommodation and employer-arranged transport create contact outside normal supervision. Bedrooms, changing areas and vehicles are private spaces.	Accommodation rules; named accommodation contact; separate reporting route; transport provider standards.	2	4	**8 MEDIUM**
Client entry: describe the actual exposure at this venue	Record controls genuinely operating and the evidence checked	L	I	Score

Further control / improvement	Owner / date	Residual L	Residual I	Residual score
Worked example: Review room allocation and access controls; reinforce privacy expectations; give residents an external escalation contact; include conduct standards in transport arrangements.	HR / Accommodation Lead 31 Jan 2027	1	4	**4 LOW**
Client entry: further control and intended outcome	Owner / target date	Residual L	Residual I	Residual score

8: Testing control effectiveness

Move beyond “in place” to “working in practice”

A policy or training session should not be treated as effective without evidence that people understand it and managers apply it.

Key control	In place?	Understood?	Applied?	Evidence	Improvement
Policy and behavioural standards					
Accessible reporting routes					
Manager intervention arrangements					
Employee and manager training					
Customer / guest expectations					
Incident recording and escalation					
Welfare support and non-retaliation					
Supplier / contractor standards					
Senior oversight and trend review					

Assessor summary

9: Action plan

Include only actions arising from the assessment Amber rows are illustrative and should be replaced or deleted.

Ref	Risk / gap	Action and intended outcome	Priority	Owner	Due	Status / evidence	Effectiveness review
S1	Customers and guests	Publish guest behaviour statement and manager intervention protocol.	High	Operations Manager	30 Nov 2026	Draft prepared	Review incident data after 3 months
S2	Manager power imbalance	Launch alternative reporting route and manager boundaries briefing.	High	People Manager	30 Nov 2026	Not started	Pulse check after implementation
S3	Agency and seasonal workers	Add site-specific reporting briefing and QR information to induction.	Medium	HR / Site Manager	Before next intake	Not started	Sample worker feedback after peak period
01							
02							
03							
04							
05							

- **Critical:** immediate control required.
- **High:** prompt action and interim protection.
- **Medium:** planned improvement.
- **Low:** maintain and monitor.

10: Monitoring, review and sign-off

Confirm whether action has reduced risk

Measure / source	Owner	Frequency	Question / threshold	Reported to
Incident and concern trends				
Training completion and understanding				
Employee confidence to report				
Manager response quality				
Exit and agency feedback				
Customer / guest complaints				
Action plan progress				

Review triggers

- A complaint, incident or emerging pattern.
- A new site, service, event type or customer group.
- Changes to hours, staffing, security or accommodation.
- Evidence that a control is not understood or applied.
- Completion of significant actions.
- The scheduled review date.

Role	Name	Signature	Date
Assessor			
People / HR review			
Senior manager approval			

A: Hospitality risk prompt library

Prompts for discussion, not a mandatory checklist

Select only relevant prompts and add venue-specific issues. The absence of complaints does not, by itself, show that a risk is controlled.

Customers and service

Comments; requests for contact details; unwanted contact; repeat customers; tips or reviews influencing tolerance; intoxicated guests.

Physical environment

Bedrooms; lifts; cellars; kitchens; storage; smoking areas; changing rooms; staff entrances; CCTV gaps.

Working practices

Late finishes; lone closing; split shifts; transport home; bedroom servicing; staff accommodation; private events.

Culture and management

Banter; blurred boundaries; control over hours or progression; favouritism; reluctance to challenge valuable customers.

Workforce

Young or inexperienced workers; agency and seasonal staff; apprentices; language barriers; new starters.

Events and digital contact

Celebrations; supplier hospitality; conferences; WhatsApp; direct messages; image sharing.

Third parties

Suppliers; contractors; drivers; entertainers; security providers; agency representatives; clients.

Additional venue-specific prompts

_____
_____
_____
_____
_____
_____
_____
_____

B: Assessment record

Document decisions and preserve the audit trail

Record	Details
Assessment scope	
People involved	
Evidence retained and location	
Risks excluded and reason	
Immediate measures introduced	
Actions transferred to tracker	
Residual risks reassessed on	
Lessons for other venues	

Completion statement

The assessor confirms that this assessment reflects the operation at the date completed, that relevant workers and evidence have been considered, and that identified actions have been assigned for implementation and review.

Name	Role	Signature	Date

Tailor terminology, governance routes and retention arrangements to the organisation. This template does not replace investigation, safeguarding, disciplinary or emergency procedures where an incident or immediate concern arises.

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