



SEXUAL HARASSMENT POLICY

INTRODUCTION

All members of staff are entitled to be treated with dignity and respect in our place of work. This means freedom from sexual harassment, feeling safe and supported and having access to redress if such behaviour does arise. Sexual harassment takes many forms, but whatever form it takes it is unlawful under the Equality Act 2010. The law requires employers to take steps to prevent sexual harassment of their workers. The organisation is committed to taking **all reasonable steps** to prevent sexual harassment. The steps we take will reflect the nature and size of our organisation, our working environment and the risks identified through our sexual harassment risk assessments.

We will take a proactive approach to preventing sexual harassment. We will not wait for an incident to occur before acting. We will assess risks, provide appropriate training, maintain clear reporting procedures and regularly review the effectiveness of the measures we have in place.

We also recognise that sexual harassment can occur online, outside normal working hours, at work-related social events and through third parties such as customers, service users, suppliers, contractors and members of the public. If you have been sexually harassed, or you have witnessed sexual harassment, we encourage you to tell us so that we can deal with the matter swiftly and appropriately.

Our managers will maintain an open-door policy, and we encourage all staff to come forward with any concerns relating to sexual harassment. Staff may raise concerns with their line manager, the HR Advisor or another appropriate senior manager. Where the concern relates to one of these individuals, an alternative reporting route will be provided. All our staff have a responsibility to behave in line with the requirements of this policy and to contribute to creating a workplace where sexual harassment is not tolerated. **Instances of sexual harassment or victimisation may lead to disciplinary action up to and including termination of employment.** This policy is reviewed regularly to ensure it remains up to date and effective. The organisation will also review its sexual harassment risk assessment, training, reporting arrangements and preventative measures on a regular basis. Any changes required will be implemented and communicated to all our employees.

SCOPE

We deplore all forms of sexual harassment and seek to ensure that the working environment is safe and supportive to all those who work for us. This policy applies to employees, workers, agency workers, trainees and contractors in all areas of our Organisation. It also applies to behaviour involving people outside the organisation where the behaviour occurs in connection with work.

DEFINITIONS

Sexual harassment is 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. Sexual harassment may be committed by a fellow worker, an agent of an organisation or a third party.

It does not need to occur in person. It can occur through digital means, including social media, messaging services and online communication channels such as WhatsApp.

Someone may experience sexual harassment even if they were not the intended target of the behaviour.

EXAMPLES OF SEXUAL HARASSMENT

Examples of sexual harassment 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;
- a person discussing their own sex life in an inappropriate manner;
- sexual posts or contact in online communications, including social media;
- spreading sexual rumours about a person;
- sending sexually explicit emails, text messages or messages through social media;
- unwelcome touching, hugging or kissing;
- comments about a person's body, appearance or clothing of a sexual nature;
- unwanted sexual messages, images or communications;
- sexualised "jokes", comments or conversations that make another person uncomfortable; and
- any other unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

The fact that behaviour is described as "banter", joking or being part of the workplace culture does not mean that it is acceptable.

VICTIMISATION

Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do, an act which is protected under discrimination and harassment laws.

The protected acts include:

- making a claim or complaint under the Equality Act 2010;
- helping someone else to make a claim by giving evidence or information;
- alleging that someone has breached the Equality Act 2010; or
- doing anything else in connection with the Equality Act 2010.

Examples of victimisation may include:

- failing to consider someone for promotion because they have previously made a sexual harassment complaint;
- dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint; or
- excluding someone from work meetings because they gave evidence as a witness.



The organisation will not tolerate victimisation of anyone who raises a concern, makes a complaint, supports another person or participates in an investigation.

CIRCUMSTANCES WHICH ARE COVERED

This policy covers behaviour which occurs in the following situations:

Sexual harassment may include behaviour that occurs:

- during working hours;
- at the workplace;
- while working remotely;
- during work-related travel;
- at work-related meetings, events or social functions, all staff must comply with this policy at these events;
- during overnight stays or work-related trips;
- through work-related electronic communications or social media;
- outside normal working hours where the behaviour is connected to work; or
- involving a colleague or other person connected with the Organisation where the behaviour has a work-related impact.
- Employees remain expected to comply with this policy at work-related social events and activities.

Where staff live in accommodation provided or connected with the Organisation, the same standards of behaviour apply within that accommodation where the circumstances are connected to work.

Care will be taken to manage risks arising from living and working alongside colleagues, including relationships between colleagues, power imbalances, socialising, alcohol consumption, overnight arrangements and situations where an individual may feel unable to report inappropriate behaviour because they continue to live or work alongside the person involved.

WHAT TO DO IF YOU ARE SUBJECT TO SEXUAL HARASSMENT OR VICTIMISATION

We are committed to ensuring that there is no sexual harassment or victimisation in our workplace.

Allegations of sexual harassment and victimisation will be treated seriously and may be dealt with as a disciplinary matter. Every situation will be considered individually and in accordance with the principles of our disciplinary procedures.

We recognise that complaints of sexual harassment or victimisation can be sensitive or intimate in nature.

You may raise a concern with:

- your line manager;
- the HR Advisor;
- another senior manager;

Where the person who would normally receive the complaint is involved in the allegation, an alternative person will be identified.



INFORMAL COMPLAINT

Where appropriate, and where the individual feels comfortable doing so, concerns may initially be raised informally. You may, if you feel able to do so, make it clear to the person that their behaviour is unwelcome and ask them to stop.

However, **you do not have to confront the person responsible for the behaviour** and you should not feel that you must deal with the matter yourself.

You can report the behaviour directly to management or HR.

A confidential helper may assist an individual in raising a concern. The confidential helper cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.

FORMAL COMPLAINT

Where an informal approach is inappropriate, has failed, or where the sexual harassment or victimisation is more serious, the matter should be brought to the attention of an appropriate manager or HR as a formal complaint. **(Sexual Harassment Complaint Form – Available on People HR or through the Cause for Concern/Critical Incident Disclosure form situated around centres, scan the code and complete the form)**

Where possible, you should keep notes of what happened so that the complaint can include:

- 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 relevant messages, emails, photographs or other evidence; and
- any action already taken by you to stop the alleged harassment.

You should not delay reporting a concern simply because you do not have all this information.

On receipt of a formal complaint, the Organisation will consider what immediate steps are necessary to protect those involved and to enable an uninterrupted investigation.

This may involve a temporary change of duties, working arrangements, location or reporting arrangements, or suspension with contractual pay where appropriate.

Any measures taken will be considered carefully to avoid unfairly disadvantaging the person who has raised the concern.

INVESTIGATION

The person dealing with the complaint will invite the complainant to attend a meeting at a reasonable time and location to discuss the matter and carry out a thorough investigation.

The meeting will normally be held within **five working days** of receipt of the complaint where reasonably practicable.

The individual will have the right to be accompanied at a formal grievance meeting in accordance with the Organisation's grievance procedure.

Those involved in the investigation will be expected to maintain confidentiality. Information will only be shared with those who need it to deal with the matter appropriately.

The Organisation will seek to investigate complaints promptly, fairly and impartially.



The investigator will consider all relevant evidence and will give the person complained about a fair opportunity to respond to the allegations.

On conclusion of the investigation, the findings will be communicated in writing.

Where the complaint is upheld, appropriate action will be taken.

APPEAL

The complainant will have the right to appeal against the findings in accordance with the Organisation's grievance procedure.

Where reasonably practicable, the appeal will be dealt with by a more senior manager who has not previously been involved in the matter.

Following the appeal meeting, the individual will be informed of the final decision in writing.

SUPPORT

Regardless of the outcome of the procedure, we are committed to providing appropriate support.

This may include:

- access to the Employee Assistance Programme;
- mediation where appropriate;
- changes to working arrangements;
- management support;
- signposting to external support; or
- other appropriate measures to manage the ongoing working relationship.

You will not be victimised for raising a complaint or concern in good faith.

WHAT TO DO IF YOU WITNESS SEXUAL HARASSMENT OR VICTIMISATION

If you witness sexual harassment or victimisation, you are encouraged to take appropriate action.

You should not take any action that may put you or another person at risk.

If you feel able to do so, you may intervene to prevent the behaviour continuing.

If you are not able or do not feel safe to intervene, you can:

- support the person who has experienced the behaviour;
- encourage them to report the incident;
- report the incident yourself to a manager or HR; or
- raise the concern through another reporting route provided by the Organisation.

The Organisation will take reports from witnesses seriously, including where the person affected has not made a formal complaint themselves.

THIRD-PARTY SEXUAL HARASSMENT

Third-party sexual harassment occurs when a member of our Organisation is subjected to sexual harassment by someone who is not part of our Organisation, but who is encountered in connection with work.

This may include:

- customers;



- clients;
- service users;
- suppliers;
- contractors;
- tradespeople;
- visitors;
- people attending work-related events; and
- members of the public.

Third-party sexual harassment may occur in person or online.

The Organisation will not tolerate sexual harassment of our employees by third parties.

The Organisation will therefore take all reasonable steps appropriate to prevent and respond to third-party sexual harassment.

Preventative measures may include:

- assessing the risks of third-party harassment;
- providing staff with appropriate training;
- making sure staff know how and to whom concerns should be reported;
- recording and monitoring incidents;
- reviewing contracts and terms and conditions where appropriate;
- making clear to customers, service users, contractors and other third parties that sexual harassment will not be tolerated;
- reviewing staffing arrangements where particular risks are identified;
- considering appropriate safety measures where necessary; and
- reviewing our risk assessment and preventative measures following an incident.

Where a third party sexually harasses a member of staff, the Organisation will take appropriate action. This may include warning the third party, restricting or ending contact, changing working arrangements, reviewing contractual arrangements or taking other appropriate measures.

Where behaviour may amount to a criminal offence, the Organisation will consider whether referral to the police is appropriate.

We will also not tolerate sexual harassment by an employee of our organisation against a third party.

PREVENTION AND RISK MANAGEMENT

The Organisation recognises that preventing sexual harassment requires more than having a policy in place. We will take proactive steps to identify and reduce the risks of sexual harassment.

Our preventative measures will include, as appropriate:

Risk assessments

We will regularly assess the risks of sexual harassment within the Organisation and take appropriate action to reduce identified risks. Risk assessments will consider the nature of our work, working arrangements, workplace culture, relationships between workers and managers, social activities, online communication, lone working, third-party contact and any other relevant risks.

Training

All staff will complete sexual harassment training through the Ihasco Portal.



Training will be completed:

- as part of induction;
- at regular intervals as determined by the Organisation;
- following significant changes to policy or legislation where appropriate; and
- where additional training is identified as necessary.

Managers will receive appropriate additional guidance and training on:

- recognising sexual harassment;
- dealing with concerns;
- receiving complaints;
- preventing victimisation;
- managing confidentiality;
- taking appropriate immediate action; and
- escalating concerns to HR.

People responsible for receiving or investigating complaints will receive appropriate guidance and support. Training completion will be recorded and monitored.

Reporting Arrangement

The Organisation provides several reporting routes. "A Cause for Concern/Critical Incident Disclosure Form is available on People HR or by scanning the QR code displayed on posters around the centre. Staff may also raise concerns with:"

- their Line Manager;
- the Head of Centre; or
- directly with the HR Advisor.

Staff are not required to report an allegation to the person involved or to anyone with whom they do not feel comfortable raising the concern. Where the concern relates to their Line Manager or Head of Centre, staff may report the matter directly to HR. Concerns may also be raised anonymously through the Organisation's disclosure process. Anonymous reports will be reviewed and investigated as far as reasonably practicable.

MANAGER RESPONSIBILITIES

Managers must:

- act immediately when sexual harassment concerns are raised or observed, not discouraging staff from reporting;
- challenge inappropriate behaviour even where no complaint has been made;
- ensure staff know how to report concerns;
- complete required training;
- participate in risk assessments;
- implement control measures arising from risk assessments;
- monitor workplace culture, sexual harassment is not accepted or dismissed as "banter".
- escalate concerns promptly to HR;
- ensure no employee is subjected to victimisation; and



- maintain appropriate records of concerns and actions taken.

RECORDING, MONITORING AND REVIEW

The Organisation will maintain appropriate records of:

- reported incidents;
- investigations;
- actions taken;
- training completion;
- risk assessments;
- preventative measures;
- staff communications; and
- reviews of the effectiveness of preventative measures.

Personal information will be handled confidentially and in accordance with applicable data protection requirements.

The Organisation will monitor information from complaints, incidents, staff feedback and other appropriate sources to identify patterns or emerging risks.

Where an incident identifies a weakness in our preventative arrangements, we will consider what further action is required.

We will review our sexual harassment risk assessment and preventative measures regularly and following significant incidents or changes in working arrangements.

DISCIPLINARY ACTION

If the decision is that an allegation of sexual harassment or victimisation is well founded, the harasser/victimiser may be liable to disciplinary action in accordance with our disciplinary procedure, up to and including summary dismissal.

An employee who receives a formal warning or is dismissed for sexual harassment or victimisation may appeal using the disciplinary appeal procedure.

When deciding on the level of disciplinary sanction to be applied, we will take into consideration any aggravating factors affecting the case.

Where an investigation establishes that a complaint was deliberately false and made maliciously, disciplinary action may be considered.

A complaint will not be treated as malicious simply because it is not upheld.

EMPLOYEE ASSISTANCE PROGRAMME

We would like to remind you that further support is available by contacting our Employee Assistance Programme (EAP), a confidential 24-hour telephone counselling service, which can be accessed on; -

Employee Assistance Programme

0800 028 0199

MHA264637 Ref Number

More details of this service are available from your Line Manager.



RESPONSIBILITY FOR IMPLEMENTATION

The HR Advisor has overall responsibility for ensuring that this policy is implemented and reviewed. Senior Management and managers are responsible for supporting the implementation of the policy and taking appropriate action when concerns are raised.

All staff have a responsibility to:

- treat colleagues and others with dignity and respect;
- comply with this policy;
- report concerns where appropriate;
- cooperate with investigations; and
- avoid behaviour that could constitute sexual harassment or victimisation.

The Organisation will take appropriate steps to ensure that staff are aware of this policy and understand how to raise concerns.

POLICY & TRAINING REVIEW

This policy will be reviewed regularly and at least annually.

The Organisation will implement and communicate any changes identified through the review.

This policy does not confer any contractual rights.

All staff will complete the Sexual Harassment Training on the Ihasco Portal every two years and will attend in house refresher training yearly.

We will regularly review the effectiveness of the training. We provide refresher training as appropriate.

Policy agreed by: CEO.

Mr John Whittaker

John Whittaker
John Whittaker (Oct 6, 2026 11:34:49 GMT+1)

Date:-

06/10/2026

This policy can be reviewed at any time.

SEXUAL HARASSMENT POLICY OCTOBER 2026

Final Audit Report

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