

# Prevention of sexual harassment at work

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## Purpose

The Society is committed to respecting and celebrating individual differences in an environment where everyone is treated fairly, and with respect. All our people are entitled to be treated with dignity, respect and courtesy within the workplace and to not experience any form of discrimination or harassment during the performance of their duties.

As a responsible and inclusive employer, we are fully aware of our obligations under the Worker Protection Bill (effective October 2024). The Society is committed to taking proactive steps to prevent employees experiencing sexual harassment in the course of their employment and to comprehensively investigate and find resolutions to any incidents of this nature.

## Scope

This policy applies to all employees, contractors, visitors, 3<sup>rd</sup> party relationships who you come into contact with during the course of your work.

This policy applies to any incidents of harassment that occur during the course of your employment, including work related events such as conferences or work-related social events.

You are expected to follow the same standards of behaviour outlined in this policy when interacting with 3<sup>rd</sup> parties who work with the Society as well as members or customers who interact with us.

## Sexual Harassment

Sexual harassment is the unwanted attention that violates a person's dignity or creates an offensive or degrading environment. Sexual harassment makes the person or persons affected feel uncomfortable, threatened or offended. It may be perpetrated internally by colleagues, or externally by 3<sup>rd</sup> party contacts. Whatever the form and source of sexual harassment, direct or indirect, it is unwanted behaviour which is unwelcome and unpleasant. This behaviour may be persistent, repeated or an isolated incident. The Society has zero tolerance approach to sexual harassment in relation to both our employees and any 3<sup>rd</sup> parties and whether committed within or outside of working hours.

Forms of sexual harassment may include:

- unwanted physical contact ranging from touching to serious assault

- verbal and written sexual harassment through jokes, banter, offensive language, gossip and slander
- sexual images displayed or shared
- demeaning or humiliating behaviour or language
- coercion, such as pressure for sexual favours

This list is not exhaustive. Sometimes harassment can be unintentional as the behaviour is meant as "harmless fun". However, if the recipient does not perceive it in this way, the behaviour is unacceptable and offensive.

Harassment can occur in the following (but not limited to) ways:

- in person or
- via different communication channels such as teams, email, text, WhatsApp, phone calls, social media
- both during and outside of working hours

## **Responsibilities**

As a Society, our responsibilities are to:

- Communicate this policy to you and ensure that everyone is aware of the standards of behaviour we expect
- Communicate this policy to all appropriate 3<sup>rd</sup> party relationships so that they are aware of the standards of behaviour expected from them
- Provide training for all employees and line managers to understand what sexual harassment is and how to address/prevent it
- Take incidents of sexual harassment seriously and ensure these are dealt with promptly.
- Ensure that you are treated fairly and with dignity
- Support those who report incidents, so that they do not feel victimised.
- Ensure that you understand the process for reporting incidents of harassment
- Deal with malicious, vexatious, or spurious allegations appropriately

As a manager, your responsibilities are to:

- Create a positive working environment by encouraging and role modelling positive behaviours
- Foster a culture of mutual respect where your team members feel safe to raise issues and concerns
- Address any reports of sexual harassment promptly
- Actively listen to any reported concerns and treat them with the appropriate level of confidentiality
- Take action, either informally, or by seeking additional advice and guidance from the Director of People & Culture

As an individual, your responsibilities are to:

- Treat colleagues with dignity and respect at all times
- Treat 3<sup>rd</sup> party associates, members and customers with dignity and respect at all times
- Behave in accordance with the Society's values and culture
- Respond positively if you are asked to modify your behaviour
- If possible, actively challenge inappropriate behaviour when you see it
- Understand the ways that inappropriate behaviours and incidents can be reported
- Swiftly report any concerns that you have through the appropriate channels

## **How to deal with sexual harassment**

### **Informal approach**

- If you are the subject of harassment, if appropriate, you are encouraged to try and resolve the issue informally by speaking directly to the individual involved. They may not be aware that their behaviour is unwelcome or upsetting. You should make it clear that you find their conduct inappropriate and ask for it to stop. It may be helpful if you are specific about their behaviour by giving examples, and including details of when and where it happened.
- If dealing with the individual is too difficult, you can ask your line manager or the People and Culture team for help. They can provide support if you wish to have help in talking to the individual concerned or can speak to the individual concerned on your behalf.

### **Formal approach**

- If an informal approach is not possible or the harassment is more serious or persistent, you should seek advice from either your line manager, the Director of People and Culture, or a member of the Executive team. Alternatively you can seek advice from Alison McKinna, the Society's Senior Independent Director ([amckinna@shepherdsfriendly.co.uk](mailto:amckinna@shepherdsfriendly.co.uk)). A formal complaint will then be dealt with in accordance with the Society's grievance procedure.
- All complaints will be treated seriously and dealt with in a timely, confidential and sensitive manner.
- As much as possible an investigation into the complaint will be conducted by someone with appropriate seniority and with no prior involvement in the complaint. The matter will be dealt with confidentially and details will be disclosed on a "need to know" basis.
- Once an investigation is complete the Society will inform all parties of our decision. Whether or not a complaint is upheld, we will consider how best to manage the on-going working relationships.
- As a general principle the decision whether to progress a complaint is up to complainant. However, the Society has a duty of care to protect all employees

and depending on the nature of the complaint, we may proceed with an investigation if we believe it is appropriate to do so.

- The outcome of the investigation may result in the complaint being treated as a matter of misconduct or gross misconduct and dealt with under the Society's disciplinary procedure. The potential sanction for gross misconduct is dismissal.
- If the harasser is a third party, the Society will consider what action is appropriate to deal with the issue.

The Society understands that reporting sexual harassment is very difficult and can be extremely stressful. We will ensure that anyone raising a complaint is given reassurance and support throughout the process.

### **Victimisation**

The Society will do all that it can to ensure that you are not victimised or subject to any detriment as a result of making a complaint. Such victimisation will in itself constitute a disciplinary offence.

### **Vexatious Complaints**

In circumstances where the Society believes that a complaint was not made in good faith, we may take disciplinary action against the person who has made the false complaint.

### **Review**

This policy will be reviewed on a regular basis to ensure that it remains compliant with both regulation and best practice.