

Sexual Harassment Policy

Protection of staff from Sexual Harassment by Clients, Customers and Third Parties

FINAL V1.1

DEFINITIONS

Organisation	Means The Talk About Trust, a registered charity and it's trading subsidiary, the Pavilion in the Park (PiPs) Ltd
Dated:	September 2026
Next Review Date:	September 2027

1. Policy Statement

The Organisation is committed to providing a safe, respectful and inclusive working environment for all employees, workers, contractors, agency staff and volunteers. The Organisation has zero tolerance for sexual harassment, including harassment committed by clients, customers, service users, suppliers, contractors or any other third party.

The Organisation recognises its legal and moral responsibility to take reasonable steps to prevent sexual harassment in the workplace and to protect staff from inappropriate behaviour by third parties.

Any allegation of sexual harassment will be taken seriously, investigated promptly and addressed appropriately.

2. Purpose

The purpose of this policy is to:

- Promote a workplace culture based on dignity and respect.
- Protect employees from unwanted conduct of a sexual nature.
- Ensure staff know how to report concerns.
- Prevent sexual harassment by clients, customers and other third parties.
- Set out the Organisation's responsibilities and response procedures.

3. Scope

This policy applies to:

- All employees, workers, contractors, consultants, apprentices, interns and agency workers.
- All work-related settings including PiP Café, the Community Room, offices, client premises, events, conferences, travel, online meetings, telephone communications and social functions.
- Behaviour by clients, customers, suppliers, service users and other third parties.

4. Legal Framework

This policy is informed by:

- Equality Act 2010
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Health and Safety at Work etc. Act 1974
- Employment Rights Act 1996

The Organisation recognises its duty to take reasonable steps to prevent sexual harassment and to respond appropriately where incidents occur.

5. Definition of Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of:

- Violating a person's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment can occur regardless of gender or sexual orientation and may be a one-off incident or repeated behaviour.

Examples include, but are not limited to:

- Sexual comments, jokes or innuendo.
- Unwanted flirting or sexual advances.
- Inappropriate touching or physical contact.
- Requests for sexual favours.
- Staring, leering or suggestive gestures.
- Sending sexually explicit messages, emails or images.
- Comments about appearance or body.
- Intrusive questions about personal relationships or sex life.
- Offensive online behaviour during video calls or messaging.

6. Third-Party Harassment

Third-party harassment occurs when an employee is subjected to sexual harassment by someone who is not employed by the Organisation, including:

- Clients
- Customers
- Patients or service users
- Suppliers
- Contractors
- Visitors
- Members of the public

The Organisation will not tolerate such behaviour and will take reasonable and appropriate action to protect staff.

7. Responsibilities

7.1 Employer Responsibilities

The Organisation will:

- Take proactive steps to prevent sexual harassment.
- Promote a respectful workplace culture.
- Provide training and awareness to staff and managers.
- Assess risks relating to third-party interactions.
- Encourage reporting without fear of retaliation.
- Investigate complaints promptly and fairly.
- Take appropriate action against third parties where necessary.
- Support affected employees.

7.2 Manager Responsibilities

Managers and supervisors must:

- Take all complaints seriously.
- Respond promptly to concerns.
- Escalate incidents to CEO/Designated Trustee where appropriate.
- Maintain confidentiality where possible.
- Ensure employees are protected from continued harassment.
- Lead by example in maintaining respectful behaviour.

7.3 Employee Responsibilities

Employees are expected to:

- Treat others with dignity and respect.
- Report incidents or concerns promptly.
- Cooperate with investigations.
- Support colleagues who experience harassment.

8. Reporting Procedure

Employees who experience or witness sexual harassment by a colleague, client, customer or third party should report the matter as soon as possible.

For TAT Staff reports may be made to:

- Your line manager
- CEO
- A Trustee

For PiP Café Staff reports may be made to:

- The shift supervisor
- The Café Manager
- The CEO
- A Director

Employees may raise concerns verbally or in writing.

The report should include where possible:

- What happened
- Date and time
- Location
- Name or description of the third party
- Names of witnesses
- Any evidence such as messages or emails

No employee will suffer retaliation for making a complaint in good faith.

9. Immediate Actions and Support

Where necessary, the Organisation may take immediate steps to protect the employee, including:

- Removing the employee from contact with the alleged perpetrator.
- Asking a third party to leave the premises.
- Suspending services or terminating business relationships.
- Adjusting working arrangements.
- Providing wellbeing or counselling support.

- Reporting serious incidents to the police.

The Organisation will consider the wishes of the affected employee wherever possible.

10. Investigation Process

All complaints will be handled sensitively, promptly and fairly.

The Organisation will:

1. Acknowledge the complaint.
2. Carry out an appropriate investigation.
3. Interview relevant individuals.
4. Review available evidence.
5. Decide on appropriate action.
6. Communicate outcomes where appropriate.

Confidentiality will be maintained as far as reasonably possible.

11. Action Against Third Parties

Where a complaint is upheld, the Organisation may:

- Issue a warning to the third party.
- Restrict access to premises.
- Reassign accounts or client relationships.
- End contracts or business arrangements.
- Report the matter to relevant authorities.
- Refuse future services.

The action taken will depend on the seriousness of the behaviour.

12. Malicious Complaints

Complaints made in good faith will never result in disciplinary action.

However, deliberately false or malicious allegations may be dealt with under the Organisation's disciplinary procedures.

13. Confidentiality

All complaints and investigations will be handled confidentially wherever possible.

Information will only be shared where necessary for investigation, safeguarding or legal purposes.

14. Training and Prevention

The Organisation will take proactive steps to prevent sexual harassment by:

- Providing training to managers.
- Ensuring managers understand their responsibilities.
- Promoting reporting mechanisms.
- Assessing workplace risks.
- Monitoring incidents and trends.
- Reviewing customer and client conduct expectations.

The Organisation may display notices stating that abusive, discriminatory or sexually inappropriate behaviour towards staff will not be tolerated.

15. Related Policies

This policy should be read alongside:

- Equality and Diversity Policy
- Dignity at Work policy within the Employee Handbook
- Grievance Procedure within the Employee Handbook
- Disciplinary Procedure within the Employee Handbook
- Health and Safety Policy
- Safeguarding, Child Protection & Safer Recruitment Policy
- Whistleblowing Policy & Procedure

16. Monitoring and Review

This policy will be reviewed annually or sooner where required due to changes in legislation or organisational needs.