



Sexual Harassment Policy

Version 1

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Introduction

Sexual Harassment is prohibited under the Equality Act 2010 and Simplify is committed to a workplace where all colleagues are treated with dignity and respect. Sexual harassment has no place here. We will act promptly to prevent it, encourage reporting, and address concerns fairly and consistently.

Aims & Objectives

The aim of this policy is to ensure a positive work environment free from sexual harassment and to meet all relevant legal requirements.

Aims:

- To foster a working environment that supports dignity and respect for all, free from any form of discrimination, bullying, harassment, and violence, including gender-based violence.
- To build continuous improvement into our culture, learning from incidents and feedback.
- To prevent sexual harassment before it happens through awareness, training, culture-building, and risk assessment.
- To promote a culture where colleagues feel encouraged and supported to challenge inappropriate behaviour.
- To set clear behavioural expectations at all levels, creating consistency and shared understanding.
- To embed respect and inclusion into everyday working practices, team meetings, leadership behaviour, and organisational decision-making.

Objectives:

- Colleagues are treated fairly and consistently when sexual harassment concerns arise.
- Managers are supported to uphold high standards of conduct and address issues promptly.
- Simplify, our colleagues, clients, recommenders and introducers are protected from the consequences of sexual harassment.
- To educate all colleague about sexual harassment and their role in developing a culture free from harassment.
- Regularly review the working environment and identify risk factors that may contribute to harassment.
- Ensure leaders and managers are held accountable for maintaining a respectful culture within their teams.
- Strengthen support for those affected (e.g., access to HR, EAP, wellbeing resources).
- Provide clear and safe reporting pathways including informal, formal, and anonymous options.
- Track themes and data to identify trends and improve prevention efforts over time.

Scope

This policy applies to all colleagues currently employed within Simplify including those in probation. It also applies to consultants, self-employed contractors, casual workers, agency workers, volunteers, interns, and other third-party contacts carrying out work for Simplify.

It covers conduct:

- In the workplace during working hours.
- At work-related events outside normal hours or off-site (e.g., training, business travel, social events).
- Online, including collaboration platforms, messaging apps and social media where there is a work connection; - during commutes or while working from home, if the conduct is work-related.
- Incidents involving customers suppliers or other third parties. We will take all reasonable steps to protect colleagues from Sexual Harassment by any third parties with which we work.

Colleagues are encouraged to report any incidents they experience or witness so that we can investigate and resolve the matter. We will take all such complaints seriously. A colleague who makes a genuine complaint will not be penalised and will be protected from victimisation.

Responsibilities of Managers

All those with line management responsibility must ensure that all colleagues are aware of this policy and understand their own, and Simplify's responsibilities.

Managers have a particular duty to ensure that, within their area of responsibility, everyone is treated with dignity and respect.

To discharge this duty, they must:

- Always challenge any unacceptable or questionable behaviour that they become aware of even if they are not directly affected.
- Be aware of behaviour and language that can cause offence including jokes and banter, and if necessary, remind workers of the expected standards.
- Respond to complaints of sexual harassment swiftly, sensitively and objectively using specified procedures
- The focus in dealing with complaints should be to understand what has happened and address that proportionately, including where this involves the employer acknowledging failing and accepting fault and blame where appropriate.
- Deal directly with third party accused (such as service users, clients, visitors or contractors) outlining actions which may include withdrawing service, terminating a contract, banning from the premises if behaviour is not moderated.
- Ensure that this policy is followed.

A member of The People Team will assist any line manager in dealing with complaints of sexual harassment.

All complaints of sexual harassment must be dealt with in accordance with the Simplify's Data Protection Policy. In terms of their own behaviour, managers are expected to be role models to others. Any inappropriate behaviour or response to such behaviour or abuse of a manager's positional power will serve to condone harassment and will be considered a serious breach of this Policy and be managed under the Disciplinary Policy.

Responsibilities of Colleagues

All colleagues have a responsibility to contribute to a respectful and productive working environment.

This includes supporting and caring for their colleagues, customers and services users.

All colleagues have a duty to assist in the creation of a safe working environment, where sexual harassment is not tolerated.

All colleagues must:

- Ensure they understand what sexual harassment is.
- Be aware of how their behaviour may affect others.
- Challenge unacceptable behaviour wherever possible as long as it is safe to do so. Forms of intervention include calling out behaviour that is unacceptable when it happens and addressing the person who is behaving inappropriately; taking steps to defuse the situation/redirect those involved; checking in with the recipient of the behaviour after it has taken place, assuring them that what occurred was not acceptable.
- Report incidents of sexual harassment when witnessed and/or support recipients of sexual harassment in reporting it.
- Co-operate in investigations into alleged sexual harassment

Preventing Sexual Harassment

The law imposes a duty of care on employers to provide a safe system of work for all colleagues. This includes a specific obligation to protect the health, safety and welfare of their colleague and others who might be affected.

We are committed to preventing sexual harassment through: - Regular, mandatory training for all colleague and managers. Senior leadership acting as visible champions of this policy. Risk assessments that consider factors increasing the risk of harassment (e.g., lone working, power

imbalances, lack of diversity). Monitoring our workplace culture through anonymous surveys, exit interviews, one-to-one conversations, return-to-work meetings to identify and address any issues. Continuous awareness-raising and communication about this policy and respectful behaviour.

Examples of Sexual Harassment

Sexual harassment is prohibited under the Equality Act 2010. It occurs when a person is subjected to 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 them. A single incident can be sufficient, or a series of incidents can amount to sexual harassment.

Sexual harassment may occur in person or online, may be verbal, nonverbal or physical, and can be perpetrated by a manager, colleague, group of colleagues or a third party (e.g., customer, supplier). Someone may experience sexual harassment even if they were not the intended target.

Types of behaviours which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging.
- Fondling, or inappropriate touching.
- Physical violence, including sexual assault and rape.
- The use of job-related threats or rewards to solicit sexual favours.

Verbal conduct

- Banter
- Mimicry
- Comments on a worker's appearance, age, private life, etc
- Sexual comments, stories, jokes or pranks
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending/sharing sexually explicit messages/images (by any medium)
- Coercion
- Gaslighting (a form of covert emotional abuse)

Non-verbal conduct

- Display of sexually explicit or suggestive material or imagery.
- Graffiti.
- Acts affecting a person's surroundings.
- Posts or contact on social media.
- Sexually suggestive gestures.

- Facial expressions.
- Whistling.
- Leering.
- Predatory behaviour.

If conduct is related to sex or gender reassignment, pregnancy or maternity, sexual orientation, or another protected characteristic under the Equality Act 2010, it may also be unacceptable behaviour.

What Should I do if I Have Witnesses Unwanted Conduct of a Sexual Nature?

You do not have to be the recipient or target of sexual harassment to raise a concern or make a complaint. If you see it happening or become aware of it, you should report it provided it is safe to do so and you feel able to do so. We recognise that past experience of sexual harassment may make this difficult. Your actions can be important in helping create a culture free from sexual harassment and ensuring that there are no bystanders. Tackling sexual harassment is everybody's responsibility. Those who have witnessed sexual harassment can use the reporting procedure outlined below.

Reporting mechanisms:

Informal Procedure

If you feel able, tell the person to stop — make it clear their conduct is unwelcome and must not continue. Often, behaviour stops once its impact is understood.

If you do not feel comfortable addressing the person directly, or if the behaviour continues, speak to your line manager or a member of the People Team for confidential support and guidance.

Even where you indicate that you prefer an informal approach, Simplify may need to act formally depending on the nature and seriousness of the allegations.

Formal Procedure

For serious concerns, where the informal approach is not appropriate or has been ineffective, the Grievance Policy & Procedure will apply.

Raising a formal complaint

Send a written complaint to your line manager. If the allegation involves your line manager, write to the next level of management or our People Advisor.

Set out what happened; when and where; who was involved; any witnesses; and any steps you have already taken.

Investigation

The investigating manager will:

- meet you to understand the complaint and any immediate support needs
- gather evidence (including speaking confidentially with witnesses)
- meet the colleague(s) concerned and allow them to respond (with the right to be accompanied at any formal meeting)
- keep objective, confidential records; and
- conclude whether the conduct appears to amount to sexual harassment and whether formal action is required

As a general principle, it is your decision whether to proceed; however, we may pursue matters independently if needed to protect colleagues or the organisation.

Third-party sexual harassment

Bullying and Harassment by third parties will not be tolerated.

If a third party (e.g. client, customer, supplier) is alleged to have sexually harassed a colleague, we will take reasonable steps to protect colleagues which may include: addressing behaviour with the third party, restricting access, reallocating work, and/or escalating to the third party's organisation. Criminal acts may be reported to the police.

Outcomes and next steps

Following the investigation, you will be informed of the outcome as soon as reasonably possible. Where allegations appear substantiated, we may commence the Disciplinary Policy & Procedure. Proven malicious or reckless false allegations may themselves be treated as misconduct.

All parties have the right to be accompanied by a trade union representative, colleague, or other person of their choosing at meetings. The investigation will be conducted promptly, with regular updates provided. Where possible, the investigator and decision-maker will be different people. If relocation is necessary, the accused will be relocated or suspended. Mediation or reconciliation may be offered where appropriate.

Disciplinary Policy and Procedure

Colleagues found to have sexually harassed others, or to have victimised someone for making or supporting a complaint, may be subject to disciplinary action up to and including dismissal for

gross misconduct. Where possible, a different manager will conduct any disciplinary hearing from the person who conducted the investigation.

Disciplinary actions may include warnings, suspension, compulsory transfers or demotions (without protection of wages or salary), and dismissal with or without notice. Both the colleague who raised the concern and the accused have the right to appeal decisions.

Please click [here](#) to access the Disciplinary Policy.

Confidentiality

Everyone involved must respect confidentiality. Information will be shared only on a need-to-know basis to investigate and resolve the matter. Records (including outcomes and relevant notes) may be kept on personnel files in line with our data protection obligations. Breaches of confidentiality may result in disciplinary action.

Confidentiality will be maintained as far as possible, but information may be shared where required by law or to protect the safety of individuals. We will not use non-disclosure agreements to prevent individuals from sharing their experiences of sexual harassment.

Use of Language

In addition, we are committed to fostering an environment in which all individuals feel comfortable, respected, and supported when addressing concerns related to sexual harassment. We encourage open dialogue and welcome feedback about our procedures and language choices, so that everyone's experience is acknowledged and valued. By regularly reviewing our policy and promoting clear, inclusive communication, we aim to ensure ongoing improvement and uphold a safe workplace for all.

Further Information and Support Services

Bullying, harassment and sexual harassment can have a profound impact on wellbeing. As a Simplify colleague, you and your family have access to our Employee Assistance Programme (EAP) for 24/7 confidential support.

Phone: 0800 389 0285 (24/7)

Web: www.healthassuredeap.co.uk

Username: Wellbeing

Password: Hub

The EAP provides telephone support, guidance on work and personal issues, and can arrange counselling (including CBT) where appropriate.

Document Control

This document will be reviewed annually and only if changes are made will a new version be created and issued to colleagues.

V	DATE	CHANGES	APPROVED BY
1	January 2026	Original draft	CPO