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## 1. OBJECTIVE

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Lodge Service is committed to creating a safe, constructive working environment in which all employees are treated with dignity and respect. For this reason, we will not tolerate sexual harassment in the workplace.

We aim to create a culture of equality and respect between all employees.

As a responsible and inclusive employer, we fully understand our obligations under the Work Protection (Amendment of Equality Act 2010) Bill effective from October 2024. We therefore are committed to take proactive steps to prevent employees experiencing sexual harassment during their employment.

To make sure this is understood throughout our organisation, we have created this policy for all employees to read and understand.

The policy sets out:

- what we mean by sexual harassment
- how you can report sexual harassment
- how we will handle reports of harassment
- the actions we can take against an employee who breaches this policy
- how we will support those who experience sexual harassment

## 2. SCOPE

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This policy applies to all employees, including those who work part-time, or on fixed-term or zero-hours contracts.

It covers conduct:

- at work in any capacity
- whilst in any Lodge Service building
- whilst using Lodge Service's IT systems
- in any non-working situation where they are identifiable as an employee of Lodge Service

This policy covers actions:

- committed by an employee of Lodge Service during the course of their employment
- experienced by any employee of Lodge Service during the course of their employment
- committed in person and online

### 3.1 ROLES & RESPONSIBILITIES: SENIOR MANAGERS AND HR

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Senior managers and HR have overall responsibility for this policy and will make sure:

- this policy is included in staff inductions
- this policy is regularly shared with all employees
- it is known that we have a zero-tolerance approach to sexual harassment

Our Senior Manager and HR must foster a culture built on mutual respect for all employees to feel safe to share their views and raise concerns.

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### **3.2 ROLES & RESPONSIBILITIES: LINE MANAGERS**

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Anyone who manages employees must also:

- support and encourage employees to tell them about any instances of sexual harassment
  - foster a safe working environment
  - understand how to handle reports of sexual harassment
  - understand when conduct must be reported to the police
- provide employees who report sexual harassment with confidential support and advice

To help prevent sexual harassment, Line Managers are committed to communicate effectively that any form of unfair treatment will not be tolerated. Line Managers must maintain high standards even when they may face criticism when doing so.

### **3.3 ROLES & RESPONSIBILITIES: ALL STAFF**

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All team members employed with us are responsible for implementing the policy.

To make this happen, employees at all levels must:

- take responsibility for their own behaviour
- behave in line with our values
- respect and support their peers
- report any sexual harassment they experience
- report any sexual harassment they witness

In addition, and to make sure the policy is still accurate and up to date, the Human Resources department will review this policy as required.

### **3.4 OUR COMMITMENT**

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We will deliver regular training sessions throughout the year, so that you have a comprehensive understanding of what sexual harassment is and your role in preventing and addressing it is.

We will ensure that additional, training, education and guidance is provided to all Managers, to give them confidence in how to deal with sexual harassment.

We will follow a clear, fair and supportive procedure to encourage the reporting of potential or alleged sexual harassment in the workplace.

Please refer to our Bullying, Discrimination and Harassment Policy as required.

## **4. WHAT IS SEXUAL HARASSMENT?**

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

- violating someone's dignity, and/or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for that person

Unwanted conduct of a sexual nature includes a wide range of behaviour.

A non-exhaustive list of examples include:

- sexual comments or jokes
- sexist jokes
- displaying sexually graphic pictures
- suggestive looks, staring or leering
- propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person's sex life or discussing your own sex life
- sexual posts or contact on social media
- spreading sexual rumours about someone
- sending sexually explicit emails or texts
- unwelcome touching, hugging, massaging or kissing
- criminal behaviour, including sexual assault, stalking, indecent exposure and offensive communication

There are clear protections against sexual harassment in the workplace under the Equality Act 2010.

Victimisation (in the context of sexual harassment) is when someone is treated badly because:

- they complain about sexual harassment
- it's believed they will complain about sexual harassment
- they help someone report sexual harassment

Victimisation is also unlawful under the discrimination laws in UK.

Please refer to our Bullying, Discrimination and Harassment Policy regarding victimisation not in the context of sexual harassment.

## **5. CONFIDENTIALITY**

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Every employee has the right to discuss or report sexual harassment confidentially.

In some cases, we might need to share information about the employee who made the complaint or during an internal hearing. Where this is the case, we'll consult with the employee beforehand and make sure this is done confidentially. We will at all times comply with any data protection responsibilities.

We will not tolerate the victimisation of employees who:

- make a report about sexual harassment in good faith
- contribute to an investigation

Those who victimise an employee for one of the above will face disciplinary action.

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### **5.1. HOW CAN WE ALL HELP PREVENT SEXUAL HARASSMENT IN THE WORK PLACE**

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We have a shared responsibility to help create and maintain a work environment free of sexual harassment. You can help do this by:

- Considering how your own behaviour affects over and amending it accordingly
- Being receptive, rather than defensive, if asked to modify your behaviour
- Treating fellow team members with dignity and respect
- Taking a stand if you think inappropriate comments, jokes or behaviour is occurring
- Making it clear to others if you find their behaviour unacceptable
- Intervening if possible to stop sexual harassment and give support to others
- Reporting sexual harassment or potential sexual harassment in the appropriate manner

### **6. HOW WE ADDRESS ALLEGATIONS OF SEXUAL HARASSMENT**

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If you experience sexual harassment, we suggest that you should keep a record of the incident or incidents. This will help with investigations if the matter is formally reported.

This includes logging:

- the date and time incidents
- details of what happened
- details of any witnesses

#### **6.1 INFORMAL PROCESS**

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If you have experienced sexual harassment, you may feel comfortable trying to resolve the matter informally. Therefore, you might want to:

- arrange an informal, confidential chat with their line manager and ask for advice and support
- speak to the person who carried out the sexual harassment and try to make them understand the effect their actions have had
- speak to the person who carried out the sexual harassment in the presence of a manager to try and make them understand the effect their actions have had
- ask a manager to speak to the person who carried out the sexual harassment

We will fully support someone who wants to resolve the matter informally.

#### **6.2 FORMAL PROCESS**

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In some circumstances you may want to formally report the matter of sexual harassment. This might include:

- raising their concerns using our grievance procedure. This can be found on the employee portal
- making a claim at an employment tribunal
- reporting the matter to the police

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### 6.3 LEGAL ACTION

In some instances, sexual harassment could be considered a criminal offence. We will respect the decision of the person whether they wish to report it to the police or not. If the matter is reported to the police, we will help them with the investigation where it can.

### 7.1 INVESTIGATING ALLEGATIONS

If an incident of sexual harassment is not resolved informally, we will perform a confidential investigation into the allegations.

We will:

- interview everyone involved
- consider the circumstances surrounding the allegations
- consider the reporting person's feelings and perception of the conduct
- establish if the conduct can be defined as sexual harassment

If allegations are upheld, we will decide what action will be taken next. This could be disciplinary action or a report to the police. Once a decision on action has been made, we will update the:

- reporting person
- victim (if they didn't make the initial complaint)

### 7.2 RECORD KEEPING AND DATA PROTECTION

We will keep a record of all reports of sexual harassment.

The information regarding the complaint will be kept on the HR files of those involved including:

- the victim
- the perpetrator
- relevant witnesses (where appropriate)

Information on a reported act of sexual harassment will be kept confidential and only discussed and shared with those:

- who need to know
- involved in the report

In some cases, we might report the conduct and share information with the police even if the victim does not want to. We will take this type of action if an incident involves:

- a hate crime
- physical violence
- sexual assault

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When we take this kind of action, we will always consult the victim of the abusive conduct before a report is made.

All information gathered, recorded and stored will comply with the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).

## **8 ACTIONS WE WILL TAKE AGAINST AN EMPLOYEE WHO BREACHES OUR POLICY**

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If an employee breaches this policy, and we have sufficient evidence they've done so, they will face disciplinary action. We will take this action in line with our disciplinary policy, which can be found employee portal.

Action will also be taken against those who make false allegations of sexual harassment or allegations in bad faith which they not to be untrue.

If we consider an employee's behaviour to have breached this policy and be gross misconduct, this will usually result in dismissal without:

- warning
- a notice period
- payment in lieu of notice

## **9. IF SEXUAL HARASSMENT IS COMMITTED BY A THIRD PARTY**

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An employee might experience sexual harassment by a third party like a customer or supplier. If this happens Lodge Service will take steps to prevent recurrence.

This could include but is not limited to:

- making sure interactions between the victim and the perpetrator are supervised
- making sure the victim does not have to interact with the perpetrator
- formally reporting the incident to the perpetrator's manager
- formally reporting the incident to the police, where appropriate

## **10. MONITORING AFTER THE COMPLAINT AND INVESTIGATION**

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Once an investigation into sexual harassment has been completed, we will actively keep an eye on the issue for a short period of time. This is to make sure:

- the reported behaviour has stopped if the perpetrator has not been dismissed
- no one is treated unfairly because they either made or supported a complaint

If there is a recurrence of sexual harassment following on from an incident already reported, we will re-engage this policy.

## **11. SUPPORT FOR THOSE WHO EXPERIENCE SEXUAL HARASSMENT**

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We are committed to making sure victims of sexual harassment:

- feel safe discussing what has happened to them
- are supported through the reporting process
- are supported after the report has been made

To do this we will:

- make sure adjustments are made for the victim including time off for counselling or to take legal advice, if required
- ask the victim to what we can do to help them
- provide information of where they can find support outside of Lodge Service

You can access support via the Employee Assistance Programme (EAP) via the PerkPro portal or you can access the 24/7 helpline on 0330 380 0648.

I have read and understood the above