

SEXUAL HARASSMENT POLICY

A) INTRODUCTION

- 1) 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.
- 2) Sexual harassment takes many forms but whatever form it takes, it is unlawful under the Equality Act 2010 as amended. We will not tolerate it.
- 3) The law requires employers to take reasonable steps to prevent sexual harassment of their workers. We take action to prevent sexual harassment from occurring and have clear reporting procedures for our staff to make a complaint about sexual harassment. 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.
- 4) The Managing Director has overall responsibility for the implementation of this policy but may delegate elements of its implementation or decision-making to appropriate managers. Managers are responsible for supporting the application of this policy, and all employees have a responsibility to behave in accordance with its requirements.
- 5) Instances of sexual harassment or victimisation may lead to disciplinary action including termination of employment.
- 6) This policy is reviewed regularly to ensure it remains up to date and in order to monitor its effectiveness. Any changes required will be implemented and communicated to our workforce.

B) SCOPE

This policy applies to employees, workers, agency workers, volunteers and contractors working for or on behalf of Inspectahire. We are committed to providing a working environment where everyone is treated with dignity and respect and is protected from sexual harassment and victimisation.

C) DEFINITIONS

- 1) 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. It also covers treating someone less favourably because they have submitted to or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex.
- 2) 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 and can occur through digital communications, including email, messaging services and social media. Someone may be sexually harassed even if they were not the intended target of the behaviour.
- 3) Examples of sexual harassment include, but are not limited to:
 - a) sexual comments or jokes, which may be referred to as 'banter'
 - b) displaying sexually graphic pictures, posters or photos
 - c) suggestive looks, staring or leering
 - d) propositions and sexual advances
 - e) making promises in return for sexual favours
 - f) sexual gestures
 - g) intrusive questions about a person's private or sex life or a person discussing their own sex life
 - h) sexual posts, messages or other inappropriate contact through online communications or social media
 - i) spreading sexual rumours about a person
 - j) sending sexually explicit emails, text messages or messages via other social media
 - k) unwelcome touching, hugging, massaging or kissing

- 4) 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. It is not necessary for the person to have done the protected act in order for detrimental treatment to be considered as victimisation.
- 5) The protected acts are:
 - a) making a claim or complaint under the Equality Act 2010 (for example, for discrimination or harassment)
 - b) helping someone else to make a claim by giving evidence or information in connection with proceedings under the Equality Act 2010
 - c) making an allegation that someone has breached the Equality Act 2010, or
 - d) doing anything else in connection with the Equality Act 2010
- 6) Examples of victimisation may include:
 - a) failing to consider someone for promotion because they have previously made a sexual harassment complaint
 - b) dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint
 - c) excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

D) CIRCUMSTANCES WHICH ARE COVERED

This policy covers behaviour which occurs in the following situations:

- a) a work situation
- b) a situation occurring outside of the normal workplace or normal working hours which is related to work, for example, a working lunch, a business trip or social functions
- c) outside of a work situation but involving a colleague or other person connected to the Company, including on social media
- d) against anyone outside of a work situation where the incident is relevant to your suitability to carry out the role.

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

- 1) 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 as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of our disciplinary procedures.
- 2) **Informal complaint**

We recognise that complaints of sexual harassment or victimisation can be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper. This person cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.
- 3) If you feel comfortable doing so, you may tell the person that their behaviour is unwelcome and ask them to stop. However, you are not required to confront the person directly and may instead raise the matter with a senior colleague, manager or Director. Support can be provided if you wish to address the matter informally.
- 4) You may also raise concerns directly with your manager at any time. Your concerns will be taken seriously and you will be supported in considering the most appropriate way to address the matter.

5) **Formal complaint**

Where an informal approach is not appropriate, has not resolved the matter, or where the sexual harassment or victimisation is more serious, you may raise a formal complaint with a Senior Manager or Director. The complaint should normally be made in writing, and you may ask a senior colleague of your choice for support in preparing it.

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

- a) the name of the alleged harasser;
 - b) the nature of the alleged harassment;
 - c) the dates and times when the alleged harassment occurred;
 - d) the names of any witnesses; and
 - e) details of action already taken or other relevant information.
- 6) On receipt of a formal complaint, appropriate interim measures will be considered to protect those involved and allow a fair and uninterrupted investigation to take place. Any measures taken will depend on the circumstances and may include changes to working arrangements or, where appropriate, suspension in accordance with Company procedures.
 - 7) The investigation meeting will normally be arranged within five working days of receipt of the complaint, wherever reasonably practicable. You have the right to be accompanied to the investigation meeting by a confidential helper or another work colleague of your choice. You should take all reasonable steps to attend. Those involved in the investigation will be expected to maintain confidentiality and any inappropriate breach of confidentiality may be dealt with under the disciplinary procedure.
 - 8) The investigation will normally be completed within ten working days of the investigation meeting, wherever reasonably practicable. The outcome and relevant findings will be confirmed to you in writing. Where additional time is required, you will be informed of the reason for the delay and the anticipated timescale.
 - 9) You have the right to appeal against the findings of the investigation. If you wish to appeal, you must inform a Senior Manager or Director within five working days of receiving the outcome. You will then be invited to an appeal meeting. Wherever reasonably practicable, the appeal will be considered by a Director or Senior Manager who has not previously been involved in the matter.
 - 10) Following the appeal meeting, you will normally be informed of the final decision within ten working days, wherever reasonably practicable. The decision will be confirmed in writing.
 - 11) Regardless of the outcome of the procedure, we are committed to providing appropriate support where required. This may include mediation between the parties or other appropriate measures to support and manage the ongoing working relationship.
 - 12) You will not be victimised for having brought a complaint.

F) **WITNESSING SEXUAL HARASSMENT OR VICTIMISATION**

- 1) 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 others at risk of harm. If you feel able to do so, you may intervene to prevent the behaviour from continuing. Alternatively, you may offer support to the person affected, encourage them to report the incident, or report the incident yourself.
- 2) If reporting the incident, you should bring the matter to the attention of a Senior Manager or Director as soon as reasonably practicable. Reports may be made verbally or in writing.
- 3) Your concerns will be handled by a Senior Manager/Director who will sensitively talk to the person subject to sexual harassment to determine how they want the matter to be handled.

G) THIRD-PARTY SEXUAL HARASSMENT

1. Third-party sexual harassment occurs when a member of our workforce is subjected to sexual harassment by someone who is not part of our workforce but who is encountered in connection with work. This may include customers, clients, suppliers, contractors or members of the public.
2. Third-party sexual harassment will not be tolerated. Inspectahire will take appropriate steps to identify and reduce the risk of sexual harassment arising through interactions with third parties.
3. If you experience or witness third-party sexual harassment, you are encouraged to report it as soon as possible to a Senior Manager or Director. Reports will be taken seriously and appropriate action will be considered based on the circumstances.
4. Where a customer, client, supplier or other third party sexually harasses a member of our workforce, appropriate action may include raising the matter with the individual or their organisation, restricting contact, removing personnel from the situation or ending the business relationship where appropriate. Suspected criminal conduct may be reported to the police.
5. We will not tolerate sexual harassment by any member of our workforce towards a third party. Such behaviour may result in disciplinary action, up to and including dismissal.

H) DISCIPLINARY ACTION

- 1) Where an allegation of sexual harassment or victimisation is found to be substantiated, the person responsible may be subject to disciplinary action in accordance with the Company's disciplinary procedure, up to and including dismissal. Any right of appeal will be managed in accordance with the disciplinary procedure.
- 2) When determining the appropriate disciplinary sanction, the Company will consider all relevant circumstances, including any aggravating factors such as an abuse of power or authority over a more junior colleague.
- 3) No disciplinary action will be taken against someone simply because a complaint is not upheld. However, where there is evidence that a complaint has been deliberately false or made maliciously, the matter may be addressed under the Company's disciplinary procedure.

Authorised by:



Cailean Forrester (Sep 4, 2026 15:24:05 GMT+1)

Name: Cailean Forrester

Title: Managing Director

Date: 04/09/2026 (Review period is within 13 months)

Sexual Harassment Policy 2026 - 2027 - POL 22 Rev 03

Final Audit Report

2026-09-04

Created:	2026-09-04
By:	Lillian Paterson (lillianpaterson@inspectahire.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAaku94KMs4Sh13hMobrkdGBKTwiRJUsx-

"Sexual Harassment Policy 2026 - 2027 - POL 22 Rev 03" History

-  Document created by Lillian Paterson (lillianpaterson@inspectahire.com)
2026-09-04 - 2:09:20 PM GMT
-  Document emailed to Cailean Forrester (caileanforrester@inspectahire.com) for signature
2026-09-04 - 2:09:25 PM GMT
-  Email viewed by Cailean Forrester (caileanforrester@inspectahire.com)
2026-09-04 - 2:23:46 PM GMT
-  Document e-signed by Cailean Forrester (caileanforrester@inspectahire.com)
Signature Date: 2026-09-04 - 2:24:05 PM GMT - Time Source: server - Signature Appearance Selected: DRAW
-  Agreement completed.
2026-09-04 - 2:24:05 PM GMT