Preventing Sexual Harassment Policy and Procedure

Policy Statement

BE Recruitment Ltd is committed to ensuring a safe and respectful working environment for all. We uphold a zero-tolerance policy towards sexual harassment in any form, whether it is committed by our workers or by third-party individuals. This policy adheres to the Equality Act 2010 (as amended) and provides a detailed procedure for preventing, reporting, and addressing sexual harassment within the workplace, including on-site placements with clients.

BE Recruitment Ltd recognises its legal duty to take reasonable steps to prevent harassment of workers in the course of their employment. The Company will take proactive measures to identify risks, implement preventative controls, provide training, and regularly review the effectiveness of those measures.

Harassment of a sexual nature by individuals who are not directly employed by BE Recruitment Ltd, such as clients, customers, suppliers, or contractors, will be treated with the same seriousness as internal cases. We are committed to taking all reasonable steps to prevent such behaviour and ensure our workers are protected in every work setting.

Scope

This policy applies to all workers, including temporary, contract, agency, and permanent staff, as well as job applicants and anyone associated with BE Recruitment Ltd. It covers all work-related activities, including work on client sites, travel, and social events.

Roles and Responsibilities

The staff in the following roles are responsible for implementing this policy:

- The Company Secretary has overall responsibility for the Preventing Sexual Harassment Policy and Procedure
- The Company Secretary has responsibility for the development and implementation of policy and procedure
- The Company Secretary is responsible for training the policy throughout the organisation and communicating internally and externally
- The Company Secretary Ltd will undertake periodic assessments of workplace and assignment-related risks, including risks arising from lone working, client interactions, social events, travel, and power imbalance situations, and will implement appropriate preventative measures.
- **All Management**: Establish and uphold a zero-tolerance policy for sexual harassment, ensure policy dissemination, provide training, and handle complaints seriously and confidentially.
- **All Staff**: Be vigilant, address inappropriate behaviour promptly, support the reporting procedure, and ensure compliance with the policy.
- **All Workers**: Understand and adhere to the policy, treat all colleagues with respect, and report any incidents of sexual harassment promptly.

Definition of Sexual Harassment

Sexual harassment includes any unwanted conduct of a sexual nature. This can occur in various forms:

- **Verbal**: Comments about a person's appearance, sexual jokes, or innuendos.

- **Non-Verbal**: Displaying sexually explicit images, making sexual gestures, or suggestive body language.
- **Physical**: Unwanted physical contact such as touching, groping, or assault.

This list is not exhaustive; any behaviour that makes someone feel uncomfortable, humiliated, or offended can be considered sexual harassment.

Preventative Measures

- **Training and Awareness**:
    - All BE Recruitment staff, will receive training on identifying, preventing, and addressing sexual harassment. Training will cover:
        - Recognising what constitutes sexual harassment.
        - How to report an incident confidentially.
        - Understanding the consequences of harassment.

Training will be provided at induction and refreshed periodically. Additional training will be provided to managers responsible for handling complaints and implementing preventative measures.

Policy Communication:

- This policy will be linked to the worker handbook, provided during induction, and made available on the company website.
- Posters and information leaflets summarising the policy and reporting procedures will be displayed prominently in all workplaces. This will include client sites where possible and with client / end user permission.

Client Collaboration:

- We will work with clients to ensure they understand and support our Preventing Sexual Harassment policy. Agreements with clients will include a commitment to maintaining a harassment-free work environment for our workers.

Reporting Procedure

Workers who experience or witness sexual harassment should follow these steps:

1. **Report the Incident**:
    - **Internal Reporting**:
        - **Direct Supervisor/Line Manager**: Report the incident to your direct supervisor or line manager, who will then escalate it to the Managing Director or Company Secretary.
        - **Managing Director or Company Secretary**: If you are not comfortable reporting to your supervisor, or if the supervisor is involved, contact the Managing Director or Company Secretary directly.
        - **Confidential Reporting Line**: You can report anonymously through our website for any issues you wish to raise.
    - **External Reporting**:

        - If you feel that internal resolution is not sufficient, you may seek advice from external bodies such as ACAS or the Equality and Human Rights Commission (EHRC).

2. **Document the Incident**:
    - Record the details of the incident(s), including dates, times, locations, the nature of the behaviour, and any witnesses. This documentation will aid in the investigation process.

Investigation Process

Once a report is received, the following steps will be taken:

1. **Acknowledgment**:
    - The complaint will be acknowledged within 24 hours of receipt. Immediate support will be offered to the complainant, including options for temporary adjustments to their working conditions if needed.
2. **Assign an Investigator**:
    - A neutral and trained investigator will be assigned to conduct a thorough investigation. If the complaint involves complex issues or senior staff, an external investigator may be appointed.
3. **Conduct the Investigation**:
    - **Interviews**: The investigator will interview the complainant, the alleged harasser, and any witnesses. All parties will be treated fairly, and confidentiality will be maintained throughout the process.
    - **Evidence Review**: Review any physical evidence (e.g., emails, messages, CCTV footage) related to the incident.
4. **Outcome Determination**:
    - A determination will be made based on the evidence. This may involve disciplinary action against the harasser if the complaint is substantiated, which can range from a warning to dismissal, depending on the severity of the incident.
    - If the complaint is not substantiated, steps will be taken to ensure that the complainant is not subjected to any form of victimisation.
    - Where a worker reports harassment by a client, customer, contractor, supplier or other third party, the Company will take appropriate action which may include intervention with the third party, reassignment of the worker, removal from the assignment, or termination of the business relationship where appropriate

5. **Communication of Outcome**:
    - Both the complainant and the alleged harasser will be informed of the investigation's outcome. The complainant will be told whether the allegation was upheld and the action taken, without breaching the privacy of those involved.

Post-Investigation Support

- **Support for the Complainant**:

- Offer continued support to the complainant, which may include counselling services, changes to working arrangements, or further protection measures.

- **Reintegration and Monitoring**:
  - Monitor the situation to prevent further harassment or retaliation. Conduct follow-up meetings with the complainant to ensure their well-being.

Confidentiality and Data Protection

All information related to a sexual harassment complaint will be handled in strict confidence. Records of the investigation will be kept secure and only accessible to those directly involved in the investigation. Personal data will be managed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

Protection Against Victimisation

BE Recruitment Ltd prohibits victimisation of anyone who reports sexual harassment or participates in an investigation. Victimisation includes any form of intimidation, reprisal, or discrimination. Such actions will result in disciplinary measures, up to and including dismissal.

External Support Services: ACAS Helpline, Equality and Human Rights Commission (EHRC)

Document Control and Accountability

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