Sexual Harassment Policy

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Sexual Harassment Policy

Part of the Company's Respect at Work Framework

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Sexual Harassment Policy

Policy Statement

We are committed to providing a safe, respectful and supportive working environment free from sexual harassment and ensuring all employees are treated, and treat others, with dignity and respect. Sexual harassment or victimisation of any employee, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated.

Sexual harassment can occur both inside and outside the workplace. This includes situations such as business trips, work-related events or social functions, and online or on social media where it relates to work.

We will take all reasonable steps to prevent sexual harassment of our employees during the course of their employment. We are committed to dealing with concerns in a fair, supportive and non-judgemental way, and we will treat all complaints seriously.

This policy sets out how you can seek support, challenge, and report any unwanted behaviours in the workplace. It makes clear the standards of behaviour we expect from all employees and details how we will investigate and deal with any complaints of sexual harassment enabling us to take the appropriate action and provide the necessary support.

This policy applies across all areas of the business including overseas locations, subject to local laws. It applies to anyone working for, or on behalf of the company. This includes employees, workers, agency or casual workers, contractors, volunteers, interns and apprentices. It also covers harassment by any third parties such as customers, suppliers and visitors. The policy applies in all work-related settings including:

- depots, yards, workshops, and offices
- customer or supplier premises
- shared vehicles and work-related travel
- overnight accommodation connected to work
- conferences, training or work social events
- online or digital environments connected to work including but not limited to WhatsApp, Microsoft Teams, text messages, emails and other communication platforms.

We recognise that some areas of our business may present a higher risk of harassment, including customer-facing roles, lone working, overnight travel, agency labour, site-based operations, workshops and yard environments, and situations where power imbalance may exist. We are committed to taking proactive steps to identify and reduce these risks.

In line with our legal obligations under the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025, we will take all reasonable steps to prevent sexual harassment and protect workers from such behaviour.

The Policy is communicated to employees using a variety of methods including different publications and training such during onboarding programmes or regular anti-harassment awareness training. The policy should be read in conjunction with the Vp Group's wider policies.

Failure to follow this policy, or committing, authorising, condoning, or failing to act appropriately in relation to sexual harassment may result in disciplinary action under the Company Disciplinary Policy, up to and including dismissal.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

This policy forms part of the Company's wider Respect at Work framework, which promotes dignity, fairness and inclusion across the organisation.

It should be read alongside the following policies and procedures:
Dignity at Work Statement
Equality, Diversity & Inclusion Policy
Harassment, Bullying & Victimisation Policy
Grievance Procedure
Disciplinary Procedure
Whistleblowing Policy

Policy Aims

- Ensure everyone understands what sexual harassment is and can openly and confidently discuss concerns about inappropriate behaviours in the workplace.
- Ensure that the Company policy and practices are clear, and our stance is that we will not tolerate any form of sexual harassment or victimisation which creates a physical or psychologically unsafe environment.
- Educate managers about the potential signs of and impact of sexual harassment in the workplace, and how they can support individuals at work.
- Reinforce our commitment to take prompt and appropriate action in response to any allegations of sexual harassment.
- Demonstrate our commitment to taking proactive measures to help create a culture where all employees feel safe from sexual harassment and victimisation.
- Ensure employees understand this policy applies in both offices and operational environments such as depots, yards, workshops, customer sites and during travel.
- Provide clear reporting routes and ensure employees feel confident that concerns will be taken seriously and that they can speak up without retaliation.
- Support the Company to meet its legal obligations by identifying high-risk situations and taking targeted steps to reduce the risk of inappropriate behaviour occurring.

What is Sexual Harassment

Sexual harassment is unwanted physical, verbal or non-verbal conduct or behaviour of a sexual nature that has the purpose or effect of:

- violating someone's dignity, whether it was intended or not;
- or creating an intimidating, hostile, degrading, humiliating or offensive environment for them, whether it was intended or not.

It also includes 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, in the past.

Harassment can be verbal, non-verbal, written, physical, visual or online. It can happen face-to-face, on the telephone, in written notes, by email, on messaging platforms such as WhatsApp or Microsoft Teams, in toolbox talks, in depots, yards, workshops, offices, shared vehicles, hotels, client locations, social events related to work or any other setting connected to work.

The person displaying the unwanted behaviour does not have to intend to sexually harass the other person for the behaviour to be considered sexual harassment. The unwanted behaviour should therefore be considered in light of its nature, the circumstances in which it occurred, and the impact on the person who experienced it. It should be noted that a single incident can amount to sexual harassment.

A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by explicit images shared in a messaging group or displayed on a colleague's computer in the workplace.

It is important to note that just because someone does not object to inappropriate behaviour at the time, that does not mean they are okay with it, or it is acceptable. A person may not object at the time because they may lack confidence, feel intimidated, embarrassed, isolated, feelings of shame or concerned about how they would be viewed, worried about losing opportunities, or because there is a power imbalance between them and the person responsible.

You may experience harassment from anyone you encounter as part of your role, including a colleague, agency worker, supervisor, line manager, contractor, customer, supplier, visitor, member of the public or someone in a position of authority or influence. It can be carried out by anyone of the same or a different gender, and every individual's experience is unique to them.

Inappropriate Conduct / Behaviour

Any incident of sexual harassment can cause long lasting and significant distress to an individual. Behaviours which are considered as sexual misconduct or harassment, and can result in disciplinary action, up to and including dismissal, are given below. This is not an exhaustive list.

- Unwanted comments of a sexual nature about a person's clothing, looks, body, appearance, sexual orientation or gender etc, in a derogatory manner or a manner that makes them feel uncomfortable.
- Sexually explicit jokes, sexist comments, innuendoes or "banter" that humiliates or offends someone.
- Insinuations, requests or demands for sexual favours of any kind and/or making promises in return for sexual favours.
- Propositions and sexual advances including excessive and unwelcomed flirting (which the harasser may perceive as harmless).
- Continued suggestions to meet up socially, or for sexual activity after it has been made clear that such suggestions are unwelcome.
- Spreading sexual rumours, asking intrusive questions or discussing a person's sex life.
- Discussing your own personal sex life.
- Unwanted physical conduct or "horseplay" - invading personal space, inappropriate and unwanted touching (hugging, stroking, massaging, grabbing, grinding, groping, purposely brushing up against someone etc.)
- Stalking/following a person, standing too close or blocking/trapping their movement.
- Unwanted, coercive, intimidating or threatening sexual behaviour/acts.
- Sexual gestures such as suggestive looks, staring or leering, whistling. Looking a person's body up and down etc. Derogatory gestures or facial expressions of a sexual nature.
- Masturbation or genital exposure.

- Displaying or sharing sexually graphic pictures, content or comments, posters, photos, text messages, emails, videos, or other information on messaging platforms (such as Microsoft Teams and WhatsApp groups connected to work) and social media.
- Behaviour of a sexual nature during work travel or overnights stays.
- Sexualised comments made in office or operational environments such as depots, workshops or yards.

One of the most extreme forms of sexual harassment is sexual assault. This is a serious crime, and the Company will support employees who wish to press charges against offenders.

It's important to recognise that people will have different experiences, backgrounds, views, feelings, and levels of sensitivity about certain matters. Something that one person finds humorous can be humiliating or intimidating to another, whether it was intended or not. Employees should therefore avoid jokes, comments or "banter" which may be offensive to others.

The following provides a guide on areas that may be considered unacceptable topics for jokes, comments or "banter" in the workplace, this is not an exhaustive list:

- **Legally Unacceptable** – age, race, religion or belief, disability, sex, gender reassignment or sexual orientation, marriage or civil partnership, pregnancy or maternity, being on a fixed term contract or part-time worker, being or not being a trade union member.

- **Socially Unacceptable** –
  - social background,
  - department, work history, or job level,
  - working pattern/arrangements,
  - political orientation,
  - thinking style, approach, communication style, noise levels, personality
  - physical appearance or dress sense
  - generational differences

Victimisation

Victimisation occurs where a person suffers a detriment because they have done, or are believed to have done, a protected act, such as raising a complaint, supporting another person's complaint, giving evidence, or participating in an investigation or legal process connected to equality law.

Victimisation may include:

- Denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment.
- Excluding someone because they have raised a grievance about sexual harassment.
- Treating someone as disloyal or troublesome because they accompanied another employee during a grievance meeting.
- Failing to allocate work, overtime, training, or promotion opportunities because someone spoke up.
- Dismissing someone or otherwise disadvantaging them because they gave evidence on behalf of another employee.

Victimisation will not be tolerated and may result in disciplinary action up to and including dismissal.

Third Party Sexual Harassment

Third-party sexual harassment occurs where a person is sexually harassed by someone who does not work for Vp plc, but with whom they have come into contact during the course of their employment such as clients, customers, contractors, suppliers, visitors or members of the public.

Employees should never feel expected to tolerate sexually inappropriate, offensive or abusive behaviour from customers, clients or other third parties. Any such behaviour should be reported so that appropriate action can be taken.

It may occur in depots, yards, workshops, offices, customer premises, shared transport, on the telephone, online, during delivery or collection activity, while travelling or while staying away for work.

Third-party sexual harassment will not be tolerated. We will take all reasonable steps to prevent this kind of behaviour.

Our legal obligations in relation to third party harassment extend beyond sexual harassment and also cover harassment related to relevant protected characteristics under the Equality Act 2010. Further information is set out in the Harassment, Bullying and Victimisation Policy.

All employees should report any third-party harassment they experience or witness so that appropriate action can be taken.

If any third-party sexual harassment of an employee occurs, we will take steps to remedy complaints and to prevent it happening again. These may include warning the third party about their behaviour, ending visits, reallocating contacts, refusing service where appropriate, banning them from our premises, escalating concerns to their employer, altering working arrangements, or reporting criminal acts to the police.

Any sexual harassment by a member of staff against a third party may lead to disciplinary action up to and including dismissal.

Preventing Sexual Harassment – Our Proactive Duty

Vp plc is committed to taking proactive steps to prevent sexual harassment, rather than relying only on complaints being made after harm has occurred.

In line with our legal duties, we will take all reasonable steps to prevent sexual harassment. What is reasonable will depend on a number of factors including the working environment and the risks identified.

We will take steps to identify and reduce risks, which may include:

- Identifying areas of the business where there is a higher risk of sexual harassment, such as lone working, overnight travel, customer-facing roles, depots, yards, workshops, site-based work, online communication channels and male-dominated teams.
- Considering where power imbalance may exist, including between managers and team members, experienced employees and new starters, qualified employees and trainees, permanent employees and agency workers, majority and minority groups and operational leaders and junior staff.
- Setting clear behavioural expectations in all work settings, including messaging groups, shared vehicles, travel, accommodation and social events.
- Ensuring reporting routes are known, accessible and trusted by employees, workers and agency workers.

- Training employees, managers and leaders on expected standards, reporting routes, bystander action and how to respond appropriately to reports of sexual harassment.
- Communicating standards of behaviour to third parties where appropriate, including customers, clients, visitors and contractors.
- Monitoring patterns or themes through complaints, grievances, surveys, exit interviews and HR data so that action can be taken where risks are identified.
- Reviewing the effectiveness of policies, training and preventative measures on an ongoing basis.
- Taking additional targeted steps in higher-risk parts of the business.

The Company may take action where concerns are identified, even if no formal complaint has been made, where this is necessary to protect individuals, manage risk, meet our duty of care or comply with legal obligations.

The Company may also take action where patterns, themes or risks are identified through complaints, workforce feedback, surveys or other organisational information.

Duties & Responsibilities

We expect everyone to take responsibility for being aware of, preventing, reporting and dealing with sexual harassment.

Employees

All employees have a responsibility to treat colleagues, workers and all other individuals they interact with in the course of their duties with dignity and respect at all times, supporting a safe working environment and culture where sexual harassment is not tolerated. Employees are expected to:

- Uphold the Company values & behaviours
- Ensure they have fully read and understood the Sexual Harassment Policy, asking questions if they are unsure.
- Ensure they understand what sexual harassment is and be aware of how their behaviour may affect others.
- Avoid jokes, comments, “banter”, images, messages or behaviour that may reasonably be offensive or intimidating to others.
- Challenge inappropriate behaviour where it is safe to do so, including supporting colleagues who may be affected and reporting concerns where necessary.
- Intervene appropriately where safe, including calling out behaviours at the time that they happen, taking steps to defuse situations, supporting those impacted, signposting individuals to reporting channels and checking in with the recipient afterwards.
- Report all incidents of sexual harassment when experienced or witnessed, or support recipients of sexual harassment in reporting their experience. This should be completed without delay to enable the necessary support to be provided to the individual and appropriate action to be taken.
- Cooperate in any investigations into alleged sexual harassment.
- Maintain confidentiality and act sensitively if involved in any complaint or investigation.

Managers

In addition to the employee responsibilities above, all those with line management responsibility must:

- Ensure that all employees and workers within their area of accountability are:
  - treated with dignity and respect.
  - aware of this policy and understand theirs and the business' responsibilities.
- Role model acceptable behaviour at all times. Always challenge unacceptable or questionable behaviour that they witness or become aware of.
- Be aware of behaviour and language that can be dismissed as "banter" but may be harmful, offensive or exclusionary, and ensure standards are maintained at all times.
- Respond swiftly, sensitively and objectively to all complaints and concerns of sexual harassment and escalate matters to HR Advisor / HR Business Partnering team.
- Consider whether temporary adjustments are required to protect an individual while concerns are looked into.
- Identify higher-risk areas in their teams and work with HR and senior managers to put proportionate preventative measures in place.
- Ensure no individual is disadvantaged because they have raised or supported a concern.

Individuals in a position of authority

All individuals in a position of authority or where a power imbalance exists, such as line managers, directors, heads of departments, mentors to students, trainers, qualified employees to trainees, long serving employees to new starters, senior employees to junior employees, permanent employees to agency workers, and employees in a majority group to those in a minority group, must be aware of the imbalance of authority / unequal relationships in the workplace and are expected to:

- Be aware of, and do not take advantage of the potential power imbalance and the vulnerability this can create.
- Never take advantage of their position of power, such as asking for sexual favours in return for enhancements or better opportunities in the workplace.
- Ensure those in a lower position of power are not subjected to inappropriate behaviours including jokes and "banter" due to their position.
- Be aware of vulnerabilities of minority groups who may be at greater risk of sexual harassment. This includes individuals with protected characteristics such as but not limited to, gender, race, sexuality, trans status, religion and disability which may increase the risk of experiencing sexual harassment.
- Act promptly where they become aware of concerns, even if no formal complaint has yet been made.

Senior Leaders (EXCO)

In addition to the above, the Senior Leaders in the business are responsible for:

- Ensuring that there are sufficient resources and reporting structures across the business to report concerns and investigate allegations.
- Ensuring that sufficient resources are available to support the emotional and physical wellbeing of all employees, specifically those who have been the recipient or alleged perpetrator of sexual harassment.
- Ensuring that high-risk environments and trends are regularly reviewed and appropriate actions are taken in areas of concern.
- Reinforcing expected standards through visible leadership and accountability.

- Ensuring managers are equipped and held accountable for culture, conduct and policy compliance.

Group HR Director & HR Team

Have a responsibility to:

- Ensure that all policies and procedures are reviewed on a regular basis
- Ensure all cases are dealt with promptly and in a fair and consistent manner
- Support managers in implementing this policy effectively.
- Regularly review data and report on any trends or areas of concerns to Senior Leaders.
- Report on any learnings from cases highlighting steps to prevent them happening again.
- Keep under review changes in law and guidance and update the policy framework accordingly.

Reporting Procedures

Any concerns should normally be raised with your line manager in the first instance. If the matter concerns your line manager, you should raise it with the next manager inline. You should however choose the method you feel most comfortable with, and this could include:

- Line Manager or another manager within the Group.
- A colleague or another employee.
- HR Team
- Mental Health First Aider

If you are not certain whether an incident or series of incidents amounts to sexual harassment, you should initially contact your line manager, a more senior manager, or the HR Team informally for confidential advice.

Concerns do not have to be raised formally, just speaking with someone may assist you in taking action or receiving support to help promptly resolve the concerns.

Employees are encouraged to raise concerns as early as possible so that the Company can take appropriate action and prevent behaviour from escalating or being repeated.

In some circumstances, particularly where there may be a wider risk to others and the Company has a duty of care to act on the information disclosed, we may need to take action even if the person raising the concern does not wish to make a formal complaint. In these situations we will seek to protect confidentiality as far as reasonably possible. Each situation will be considered on a case-by-case basis, and a decision will be made following a review of the information held at the time.

A disclosure relating to sexual harassment may also qualify as a protected disclosure under whistleblowing legislation. Further information about raising a concern under these arrangements is available in the Whistleblowing Policy.

Informal Steps

If you believe you are being sexually harassed, you should consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome, is inappropriate or makes you uncomfortable and that it must stop. If this is too difficult, inappropriate or unsafe, you should follow the reporting procedures above and speak to someone who can provide advice and assistance in resolving the issue informally.

Informal action may include a direct conversation, support from a manager or HR, reminding an individual of expected standards, mediation where appropriate, or steps to minimise contact.

If this action does not resolve the issue, or if the matter is too serious for informal resolution, you should follow the formal procedure below.

Raising a Formal Complaint

If you are not happy with the outcome of an informal process, or if you feel it is not appropriate to approach the issue informally, you may decide to raise it formally. Please see below and also refer to the Company Grievance Procedure.

To make a formal complaint about sexual harassment, you should submit it in writing to your line manager. Complaints may also be addressed under the Company Grievance Procedure where appropriate.

If the matter concerns your line manager, you should submit it to the next manager inline. If for any reason you are unable to approach your line manager or a more senior manager, you can send it to the HR Team.

Your written complaint should set out full details of the conduct in question, including the name of the harasser, the nature of the sexual harassment, the date(s), time(s) and location(s) at which it occurred, the names of any witnesses, any messages, images, emails or other relevant material, any action that has been taken so far to attempt to stop it from occurring, and the impact the behaviour has had on you.

As a general rule, the decision whether to progress a complaint is up to you. However, we have a duty to protect all employees and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

Formal Investigations

Following the receipt of a complaint:

- An appropriate Manager will be allocated to the case and will investigate the complaint in a timely, respectful and confidential manner. Individuals not involved in the complaint, or the investigation should not be told about it.
- Where reasonably practicable, we will arrange a meeting with you, usually within 5 business days of receiving your complaint and appointing a hearing manager, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation.
- Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation. We will also consider what additional action may be appropriate to protect you and other employees pending the outcome of the investigation.
- The Manager will also meet with the alleged harasser to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.
- Where your complaint is about someone other than an employee, such as a customer, supplier, visitor or member of the public, we will consider what action may be appropriate to protect you and other employees pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party or their organisation.

- It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.
- Further meetings may be held with you or the alleged harasser to ask you additional questions in light of any information we have gathered.
- Where relevant, the investigation may include review of WhatsApp messages, Microsoft Teams communications, emails, CCTV, travel records, work logs, witness accounts or other relevant material.

Action following the investigation

- The Manager will consider all the evidence in full before informing you of their decision, either during an additional meeting or in writing. If the decision is delivered to you in a meeting, you have the same right to be accompanied as before.
- If we uphold the complaint prompt action will be taken to address it and if the harasser is an employee, we will instigate the Disciplinary Procedure, and the matter will be dealt with as a case of possible misconduct or gross misconduct. Disciplinary outcomes could be up to and including dismissal.
- Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation, counselling, additional management support, training, or if possible, to change the duties, working location or reporting lines of one or both parties.
- We will also consider what additional measures we may need to take as preventative measures for the future, including wider team action where concerns suggest cultural or systemic issues.
- Any employee who deliberately provides false information in bad faith, or who otherwise acts in bad faith as part of an investigation, may be subject to action under our Disciplinary Procedure. However, you will not be disciplined or treated detrimentally because your complaint has not been upheld.

Appeals

- If you are not satisfied with the outcome you may appeal, within 5 business days of receiving the outcome letter. This should be done in writing setting out what aspects of the decision you are unhappy with and the reasons why. Your appeal should be addressed to the HR Team who will organise for an appropriate appeal manager (someone who has not previously been involved in the case) to hear your appeal.
- Once an appeal manager is appointed, and where reasonably practicable, they will aim to hold a meeting, normally within 5 business days, to discuss your appeal in full. You must take all reasonable steps to attend the meeting and may be accompanied by a colleague or trade union representative.
- Once full consideration has been given, the appeal manager will confirm their final decision in writing, usually within 10 business days of the appeal hearing. This is the end of the procedure and there is no further appeal.

Please note that although we aim to deal with cases in a timely manner there may be circumstances (such as complex or large cases, difficulties in appointing relevant managers, availability of witnesses, or difficulties in diary management) where delays cannot be avoided. If this is the case, we will communicate this to you.

Support for those affected or involved

We understand that anyone affected by, or involved with, a complaint of sexual harassment may feel anxious or upset and we will do what we can to support you.

- **Experiencing** sexual harassment can have a profound emotional, psychological and physical effect on an individual. If you feel you cannot continue to work in close contact with the person concerned, we will seriously consider any requested changes to your working arrangements during our investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser.

- Being **accused of** sexual harassment can be distressing for an individual and may cause challenges in their personal and professional life. Vp plc is committed to conducting a thorough and fair investigation into all allegations of sexual harassment and individuals complained about will be treated with respect and dignity throughout the process.

- **Witnessing** an incident can be upsetting and distressing and it takes courage to report and/or challenge the behaviour witnessed. It is important for the individual to remember to care for their own health and get support where needed.

Whether you have experienced sexual harassment, or been accused of, or witnessed sexual misconduct, we encourage you to reach out for emotional support using the resources below:

Internal resources for employees and managers include the following:

- Employee Assistance Programme
- Wisdom Wellbeing App
- Mental Health First Aiders
- AXA Health Insurance (for members)

External Support - There's a wide range of external support for individuals who have experienced, witnessed, been affected by, or been accused of involvement in a sexual misconduct incident:

- Rape Crisis (www.rapecrisis.org.uk)
- Protect (www.protect-advice.org.uk)
- Victim Support (www.victimsupport.org.uk)
- The Equality Advisory and Support Service (www.equalityadvisoryservice.com)
- Rights of Women (England & Wales) (www.rightsofwomen.org.uk)
- Scottish Women's Rights Centre (www.scottishwomensrightscentre.org.uk)
- Women and Girls Network (www.wgn.org.uk)
- Survivors UK (www.survivorsuk.org.uk)

Employees that raise concerns, report they have witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary procedure.

If you believe you have suffered any such treatment you should inform your line manager or the HR Team without delay. If the matter is not remedied, you should raise it formally using our Grievance procedure.

Consequences of breaching this policy

If, following a formal investigation, we find that you have committed sexual harassment or, where you had a responsibility to act, you failed to respond appropriately to sexual harassment of which you were aware, we will deal with the issue as a possible case of misconduct or gross misconduct.

We may take disciplinary action against you, up to and including dismissal (or other appropriate action for non-employees). You should be aware that any aggravating factors, such as abuse of power over a more junior colleague, retaliating against someone who has raised concerns, or repeated behaviour after warnings or training, will be taken into account in deciding what disciplinary action to take.

Sensitivity and confidentiality

Anyone involved with an informal or formal complaint about sexual harassment, including witnesses, is expected to maintain confidentiality of the process and the sensitivity of the matter. Information should not be shared with others unless reasonably necessary, for example to obtain advice, support or representation.

If you are found to have breached confidentiality or acted without due care or sensitivity in a case of sexual harassment, we may take disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).

If you are an employee, please refer to our Disciplinary Policy for further information.

Record-keeping

Information about a complaint by, or about an employee may be placed on their personnel file, along with a record of the outcome and any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

We may also retain anonymised or aggregated information for monitoring purposes to identify trends, hotspots, repeat concerns, training needs and the effectiveness of preventative measures.

Training & Communication

We will take all reasonable steps to prevent sexual harassment of our employees during the course of their employment through:

- Ensuring all our new starters, including agency workers where appropriate, are made aware of and have access to this policy.
- Ensuring all employees complete Sexual Harassment training at appropriate intervals. This includes confirming that they understand and will follow this policy.
- Providing additional training for line managers to ensure that they understand how to implement this policy effectively and their role in preventing and stopping sexual harassment from occurring in the workplace, and by third parties that you may have contact with.
- Providing additional guidance and training for higher-risk parts of the business, including depots, yards, workshops, customer-facing roles, lone working, and overnight travel.
- Making clear that this policy applies equally to in-person behaviour and to digital communications including WhatsApp, Microsoft Teams and other communication platforms used for work purposes.
- Publicising and communicating our Sexual Harassment Policy using various methods including the intranet, notice boards, Employee Handbook, Company-wide emails, Toolbox Talks, and The Academy.

- Monitoring workplace culture through anonymous surveys, exit interviews, one-to-one conversations, return-to-work meetings and other available information to identify and address any issues.
- Undertaking risk assessments to identify sexual harassment risks and determine the preventative measures required.
- Ensuring that our zero tolerance approach to all forms of sexual harassment, is communicated to all employees and, where appropriate, to third parties.

Monitoring and review

This policy is reviewed annually and, if necessary, amended to ensure that it remains effective. We will analyse data around allegations of sexual harassment (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy. This includes monitoring the treatment and outcomes of any complaints of sexual harassment we receive to ensure that:

- they are properly investigated and resolved.
- those who report or act as witnesses are not victimised.
- repeat offenders are dealt with appropriately.
- cultural clashes and areas of heightened risk are identified and addressed
- workforce training is targeted where needed.
- preventative measures remain effective and proportionate.