



Key Contact: Senior Management Team (SMT)

Date : 1st June 2025

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Sexual Harassment Policy

At Survivors' Network, we are brave, we are compassionate, we are empowering and we are collaborative. These values guide how we interact with each other and serve our community.

This means:

We centre survivors in everything we do

We pay attention to and transform power

We practice care and love

We tackle intersecting forms of oppression

We build a culture of openness and are open to change

We do the work

We believe that by living these values, we can create a stronger and more effective charity that makes a meaningful difference in the world.

We strive to ensure that these values are reflected in the creation and implementation of all Survivors' Network policies.

As an equal opportunities employer, Survivors' Network aims to provide a safe and supportive working environment for all of our colleagues, free from harassment.

Introduction

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.

Sexual harassment takes many forms, but whatever form it takes it is unlawful under the Equality Act 2010 (EqA) as amended. We will not tolerate it.

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.

The SMT has overall responsibility for the operation of this policy but may delegate elements of implementation or decision-making to each departmental managers. Our managers will maintain an open-door policy and we encourage all staff to come forward with any concerns in relation to sexual harassment. All our staff have a responsibility to behave in line with the requirements of this policy.

Instances of sexual harassment or victimisation may lead to disciplinary action up to, and including, termination of employment.

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.

Sexual harassment breaches Survivors' Network policy as outlined below and goes against the very core of the mission and values of our charity. This policy should be read in conjunction with our Dignity At Work policy and our Disciplinary and Grievance procedures. Sexual harassment is classified as a serious offence, which may result in disciplinary action. In addition, it should be noted that harassment might well constitute a criminal act for which individuals may face prosecution through the Courts.

Survivors' Network recognises that harassment is potentially damaging to the health and wellbeing of employees and volunteers (henceforth referred to as 'staff'). In addition to the personal costs to our staff, there are other costs that the charity may bear in terms of low productivity, dissatisfied staff, poor quality of service and high staff turnover. Accusations of sexual harassment can be distressing for the person accused, too. Whilst a fair and thorough investigation will be carried out, we will also offer support and security to everyone involved in the investigation, regardless of their involvement.

This policy applies to all staff within Survivors' Network. Everyone carries personal responsibility for their own behaviour in relation to this policy and is responsible for ensuring that their conduct is in line with the standards set out in this policy.

All staff will be informed of Survivors' Network policy with regards to sexual harassment at induction and informed of the procedures in place to deal with it.

Scope

We deplore all forms of sexual harassment and seek to ensure that the working environment is safe and supportive to all those who work for us. This includes employees, workers, agency workers, volunteers and contractors in all areas of our charity, including any overseas sites.

1. Definition

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 in relation to gender reassignment or sex.

Sexual harassment may be committed by a fellow worker, an agent of a charity, or a third party. It does not need to occur in person. It can occur via digital means, including social media sites or channels (e.g. WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour. Examples of sexual harassment include, but are not limited to:

- Inappropriate physical contact, from invading someone's personal space and unnecessary touching, hugging, massaging or kissing through to sexual assault and rape (although rape is defined as a separate criminal offence)
- Suggestive looks, staring or leering
- Unwanted sexual comments (including comments about someone's body or personal life)
- Sexual comments or jokes, which may be referred to as "banter"
- Unwelcome sexual invitations, innuendos, and offensive gestures including wolf-whistling, cat-calling or offensive sexual noises
- Groping, pinching or smacking someone's body
- Tugging, pulling or lifting up someone's clothing
- Exposure of sexual organs
- Stalking
- Suggestions that sexual favours may further someone's career, or that refusing them may damage it – including demands for sexual favours and worsening of behaviour if a sexual advance is rejected
- Displaying offensive material, such as pornographic pictures, including circulating such material in emails, text messages or messages via other social media
- Propositions and sexual advances
- Making promises in return for sexual favours
- Sexual gestures
- Speaking about sexual experiences personal sex lives
- Intrusive questions about a person's private or sex life or a person discussing their own sex life
- Sexual posts or contact in online communications, including on social media
- Spreading sexual rumours about a person
- Unwelcome conversations that are unwanted from third parties
- Whilst having Drinks after work leading to any of the above

Sexual harassment can come from anyone, including but not limited to:

- Someone on the same team
- A supervisor or manager
- Another member of staff
- Someone else that a staff member comes into contact with while working

Allegations may be about non-recent incidents. These will be taken seriously as we recognise that coming forward about these experiences can take time and support.

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. These are outlined below. It is not necessary for the person to have done the protected act in order for detrimental treatment to be considered as victimisation.

The protected acts are:

- Making a claim or complaint under the EqA (e.g. for discrimination or harassment)
- Helping someone else to make a claim by giving evidence or information in connection with proceedings under the EqA
- Making an allegation that someone has breached the EqA
- Doing anything else in connection with the EqA.

Examples of victimisation may include:

- Failing to consider someone for promotion because they have previously made a sexual harassment complaint
- Dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint
- Dismissing someone as they raised a harassment case due to witnessing the incident
- Excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.
- Moving someone to a new role or department as they raised a sexual harassment claim

Circumstances which are covered

This policy covers behaviour which occurs in the following situations:

- A work situation
- A situation occurring outside of the normal workplace or normal working hours which is related to work, e.g. a working lunch, a business trip, drinks after work, or social functions
- Outside of a work situation but involving a colleague or other person connected to the charity, including on social media
- Against anyone outside of a work situation where the incident is relevant to your suitability to carry out the role.
- Meeting clients
- Meeting suppliers

2. Behaviour outside work and online

If unwanted or offensive behaviour happens outside of the workplace but is still related to Survivors' Network, for example at a work-related social event or training course, this can still be reported and it will be dealt with in line with this policy.

If a staff member posts potentially offensive or inappropriate comments or images about or directed at colleagues or service users on social media, we will take this very seriously and it will be dealt with in line with this policy, and in line with our disciplinary and grievance policy.

3. The Equality Act

The Equality Act 2010 makes employers potentially liable for the harassment of their staff, including by people they don't employ. In recognition of this legal obligation, as well as Survivors' Network's core mission and values, Survivors' Network is totally committed to the elimination of bullying, harassment, victimisation or discrimination and adopts a zero-tolerance attitude to all forms of harassment.

4. Responsibility

Every manager has an obligation to prevent harassment and to take immediate and sensitive action once it has been identified, whether or not a formal complaint has been made.

All staff within Survivors' Network have a responsibility to make our workplace a safe space. To that end, every staff member has a personal responsibility not to harass or bully other members of staff.

This policy is made with the understanding that staff or volunteers who experience sexual harassment may not feel comfortable to share this directly with a line manager for a multitude of reasons. As such multiple avenues for reporting are on offer and detailed below.

5. Making a complaint of sexual harassment

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, a copy of which is available from the charity intranet or the office.

Depending on the wishes of the complainant, it is acceptable to raise the issue informally or to take the issue directly to a formal complaint using the grievance procedure. Anyone who feels that they have been sexually harassed, or who feels they have seen sexual harassment take place, can make an informal complaint of sexual harassment to their line manager, any other line manager they feel comfortable to, one of our mental health first aiders, via our HR consultant, or during clinical supervision. Disclosures made to HR or during Clinical Supervision will be reported back to the employee's line manager or SMT anonymously if the reporter requests this. Disclosures can be made at any time in this way by emailing HR@survivorsnetwork.org.uk.

Before speaking to someone, it is often useful to make notes about the incident involved, especially if recalling the incident is particularly upsetting. It is also advisable to keep a record of any incidents detailing when, where, what occurred, and witnesses (if any), as a formal complaint must be made in writing.

6. Handling a complaint of sexual harassment

All complaints of sexual harassment will be taken very seriously and handled fairly and sensitively.

Experiencing sexual harassment is often extremely emotional and distressing. This means we will aim to make reporting as stress-free as possible, including making sure there is plenty of time to discuss the matter and offering a private space to meet.

We understand that the complainant may want to be accompanied by a colleague or a trade union representative at a meeting involving allegations of sexual harassment. This can be arranged. The complainant may wish to be accompanied by a friend or family member; this is permissible at the discretion of Survivors Network.

If a complaint is reported to police, or criminal court proceedings are being pursued, internal investigations will still take place as an employment matter, in line with our disciplinary and grievance procedures.

7. 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 to your line manager, any other line manager you feel comfortable to, one of our mental health first aiders, via our HR consultant, or during clinical supervision. Disclosures made to HR or during Clinical Supervision will be reported back to the employee's line manager or SMT anonymously if the reporter requests this. Disclosures can be made at any time via our HR Consultant by emailing HR@survivorsnetwork.org.uk.

If you experience sexual harassment and you feel comfortable to do so, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

In addition, you may also choose to raise concerns during your regular communication with your manager, e.g. in a one-to-one meeting. Your manager will listen to you and take your concerns seriously if you do this but may encourage you to follow the reporting procedures set out below. If you don't have a one-to-one meeting scheduled with your manager, you can ask to meet with them to discuss any concerns that you may have. They will raise the concerns with HR.

8. Formal complaint

Where the informal approach fails or if the sexual harassment or victimisation is more serious, you should bring the matter to the attention of the SMT or HR as a formal written complaint and again your confidential helper can assist you in this.

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

- The name of the alleged harasser
- The nature of the alleged harassment
- The dates and times when the alleged harassment occurred
- The names of any witnesses

- Any action already taken by you to stop the alleged harassment.

On receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved. Suspension is a neutral act and is not a disciplinary sanction in itself. Both parties will have the right to be supported by a colleague.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. The meeting will normally be held within five working days of receipt of your complaint. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence may be dealt with under the disciplinary procedure.

On conclusion of the investigation, which will normally be within 10 working days of the meeting with you, the decision of the investigator, detailing the findings, will be sent in writing to you.

You have the right to appeal against the findings of the investigator. If you wish to appeal, you must inform a SMT member within five working days of receiving the outcome. You will then be invited to a further meeting. As far as reasonably practicable, the charity will be represented by a more senior manager than the manager who attended the first meeting (unless the most senior manager attended that meeting).

Following the appeal meeting, you will be informed of the final decision, normally within 10 working days, which will be confirmed in writing.

Regardless of the outcome of the procedure, we are committed to providing the support you may need. This may involve mediation between you and the other party or some other measure to manage the ongoing working relationship.

You will not be victimised for having brought a complaint.

9. Procedure

Where an issue of sexual harassment or potential sexual harassment is raised, the CEO is to initiate an investigation of the circumstances and agree an action plan with all concerned. The investigation is to be independent of the protagonists and, where necessary, external resources will be utilised. The SMT is to ensure that anyone conducting an investigation has received appropriate training, information and instruction to allow both a thorough and impartial examination of the facts as they present.

10. Investigation

The investigation should be initiated as soon as possible, and an investigation meeting should be undertaken in accordance with the disciplinary and grievance procedure. This period may be extended where it is agreed that this would be in the best interests of the investigation. All parties must be informed of such a decision and given information, without prejudicing the investigation, supporting a delay.

11. Findings

The findings of the investigation are to be detailed in a written report, which will be distributed to all parties concerned and to the Management Committee. Any actions necessary will then be implemented without delay.

The SMT will ensure the investigation proceeds as quickly as is practicable and that all parties are regularly updated with regard to its progress. On completion of the investigation a report will be made to Management Committee members and the action plan is to be implemented drawing on available resources as necessary.

12. Discipline

The investigation will not necessarily result in disciplinary action where alternative solutions are appropriate such as mediation or the modification of behaviour, however, the sanctions set out in the disciplinary policy may be used if appropriate.

If the decision is that the allegation of sexual harassment or victimisation is well founded, the harasser/victimiser will be liable to disciplinary action in accordance with our disciplinary procedure up to, and including, summary dismissal. An employee who receives a formal warning or who is dismissed for sexual harassment/victimisation may appeal by using our disciplinary appeal procedure.

When deciding on the level of disciplinary sanction to be applied, we will take into consideration any aggravating factors affecting the case. One example of aggravating factors is an abuse of power over a more junior colleague.

If, due to the investigation, it is concluded that your complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

13. Support

Where appropriate internal/external counselling will be available to victims of sexual harassment to ensure, where possible, a complete recovery. Support will also be offered to complainants if they wish to pursue the issue within the criminal justice system. As this is a service offered by Survivors Network, alternative support can be offered from an outside agency should if this is more comfortable for the staff member. Relevant support services are also listed below.

Samaritans: A charity who can provide emotional support for anyone struggling to cope and who needs someone to listen. They can be found at: www.samaritans.org

Police: Call 999 if someone is in immediate danger or if the crime is in progress. Otherwise contacting the police is at the discretion of the complainant.

14. Confidentiality

The highest degree of confidentiality is to be maintained at all times during the investigation into sexual harassment. Survivors' Network gives an assurance that there will be no victimisation against

anyone making a complaint under this policy or against anyone who assists or supports a colleague in making a complaint.

Under no circumstances will the fact that a member of staff has made a complaint of sexual harassment be entered onto their personnel record. Raising a complaint is to have no effect on the individual's status or future within the charity.

15. Communication

All staff will be informed of the Sexual Harassment Policy. They will be reassured regarding:

- Fear that others will consider the behaviour trivial and not take complaints of harassment seriously
- Fear that no action will be taken against a person found guilty of harassment
- Fear of retaliation or victimisation in registering a complaint either informally or formally

The Sexual Harassment Policy will be part of staff induction. Survivors' Network welcomes staff suggestions in delivering a workplace free from harassment. The CEO will consult with staff wherever practicable to further develop procedures to deal with harassment.

It is envisaged that this policy will develop over time to account for such development and for changes in working conditions, legal requirements and other developments.

16. Training

Training will be provided for those employees who have a specific responsibility for implementing this policy or who may be involved in dealing with complaints that arise.

We provide training to ensure there is a clear understanding of:

- What sexual harassment is, how it may occur and that it will not be tolerated
- Expected levels of behaviour
- How they can report any incidents of having been sexually harassed or having witnessed it
- How acts of harassment will be dealt with under the disciplinary procedure, which can potentially result in dismissal.

We ensure that all levels of management are trained on implementing this policy, including preventing and managing sexual harassment in the workplace and the procedure to follow if an allegation is reported.

We will regularly review the effectiveness of our training. We provide refresher training as appropriate.

What to do if you witness sexual harassment or victimisation

Staff who experience sexual harassment or staff who witness sexual harassment have multiple avenues they can report by.

If you witness sexual harassment or victimisation, you are encouraged to take appropriate action to address it. You should not take any action that may put you at risk of sexual harassment or other harm. If you feel able, you should intervene to prevent the matter continuing. If you are not able to do this, your action may include offering support to the person who has been sexually harassed and encouraging them to report the incident or reporting the incident yourself.

If reporting the incident, you should bring the matter to the attention of your manager in writing. Alternatively, you can report instances of sexual harassment by emailing HR. Your concerns will be handled by a senior manager and HR who will sensitively talk to the person subject to sexual harassment to determine how they want the matter to be handled.

Third-party sexual harassment

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 includes our clients, survivors, suppliers, freelance contractors, members of the public, friends and family of colleagues clients, and service providers.

Third-party sexual harassment of our workforce is unlawful and will not be tolerated. The law requires employers to take steps to prevent sexual harassment by third parties and we are committed to doing so.

The law does not provide a mechanism for individuals to bring a claim of third-party harassment alone. However, failure for an employer to take reasonable steps to prevent third-party sexual harassment may result in legal liability in other types of claim.

In order to prevent third-party sexual harassment from occurring, we will:

- Ask service users to agree to the group agreement at the start of each group, stating they will respect the members of the group and staff.
- Share with third parties (ie suppliers) of our zero-tolerance sexual harassment policy within our supplier/freelancer documentation and contracts
- Ask suppliers for their sexual harassment policies and procedures

If you have been subjected to third-party sexual harassment, you are encouraged to report this as soon as possible to your manager and HR.

Should a client sexually harass a member of our workforce, we will fully investigate; which may include discussing/warning our client about their behaviour, share information with our other offices as appropriate. Any criminal acts will be reported to the police.

We will not tolerate sexual harassment by any member of our workforce against a third party. Instances of sexual harassment of this kind may lead to disciplinary action, including termination of employment.