



## **Workplace Harassment Policy**

### **Objective:**

This policy aims to establish a clear framework for taking proactive steps to prevent and address all forms of harassment within the workplace, in compliance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, effective from October 26, 2024.

### **Scope:**

This policy applies to all employees, contractors, and third parties including schools and their staff engaged with the company, encompassing all work-related activities, including those conducted off-site or during work-related events.

### **1. Definition of Harassment**

Harassment is defined as unwanted conduct related to a relevant protected characteristic that has the purpose or effect of:

- Violating an individual's dignity; or
- Creating an intimidating, hostile, degrading, humiliating, or offensive environment for that individual.

Relevant protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

### **2. Employer's Duty to Prevent Harassment**

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, the company is legally obligated to take reasonable steps to prevent harassment in the workplace. This includes:

- **Risk Assessment:** Identifying areas where employees may be exposed to harassment, including from third parties such as clients or customers.
- **Policy Development:** Establishing and maintaining clear anti-harassment policies that outline expected standards of behaviour and procedures for reporting and addressing harassment.
- **Training:** Providing regular training to all employees, especially managers, on recognising, preventing, and responding to harassment.
- **Reporting Mechanisms:** Implementing confidential and accessible channels for reporting harassment incidents.
- **Support Systems:** Offering support to individuals who have experienced harassment, including adjustments to work arrangements if necessary.

### 3. Employee and Client Responsibilities

Employees and clients are expected to:

- Treat each other with respect and dignity, this includes speaking kindly and politely, using positive body language, and asking questions to clarify any miscommunication or misunderstandings
- Refrain from engaging in any form of harassment which includes but is not limited to:
  - Verbal Harassment: speaking in a derogatory manner, using threatening or offensive language, inappropriate comments or jokes
  - Physical Harassment: unwanted touch, inappropriate conduct such as physically blocking someone's path, any aggressive or intimidating behaviour or body language
    - Visual Harassment: derogatory or degrading body language such as eye-rolling, tutting, treating someone condescendingly, staring or leering, sending inappropriate messages or showing inappropriate images
    - Sexual Harassment: offering abnormal employee benefits, unwanted sexual advances, unwelcome invitations or otherwise
- Report any incidents of harassment they experience or witness promptly, using the established reporting mechanisms.

#### **4. Reporting and Investigation Procedures**

- Reporting: Employees should report incidents of harassment to their line manager if the incident has been from a ClubsComplete client (parent/guardian) or Employee. Alternatively, in the event that harassment is experienced in a school setting from a school employee - please ask to speak to a member of SLT and ask for a copy of their Harassment Policy to ensure you follow the correct process before leaving school. Due to the confidential nature of reporting harassment, ClubsComplete may be unable to deal with or discuss any harassment claims which arise in a school setting from school staff as the Employees there are employed by the school directly - this must be handled using the school's Harassment Policy.
- Investigation: All reported incidents to ClubsComplete which concern ClubsComplete Employees or Clients will be investigated promptly and thoroughly, maintaining confidentiality to the extent possible.
- Outcome: Following the investigation, appropriate action will be taken, which may include disciplinary measures up to and including termination of employment/ use of services for clients

#### **5. Protection Against Retaliation**

The company prohibits retaliation against individuals who report harassment or participate in investigations. Any retaliatory actions will be subject to disciplinary procedures.

#### **6. Third-Party Harassment**

The company recognises its duty to protect employees from harassment by third parties.

Measures include:

- Informing clients, customers, and visitors of the company's harassment policy.
- Taking appropriate action if third-party harassment occurs, which may involve terminating services for parents or reporting incidents to relevant authorities.

#### **7. Monitoring and Review**

The company will regularly review and update this policy to ensure its effectiveness and compliance with current laws and best practices. Feedback from employees will be considered in these reviews.

## **8. Legal Compliance**

This policy is designed to comply with the Worker Protection (Amendment of Equality Act 2010) Act 2023 and other relevant legislation. Non-compliance with this policy may result in legal consequences for the company and individuals involved.

## **9. Contact Information**

For further information or to report an incident, please contact your Line Manager immediately. Please note if you experience harassment by an external party such as a staff member in a school setting who is not an employee of ClubsComplete, please report this in school before you leave, following the school's Harassment Policy.

By adhering to this policy, we commit to fostering a respectful and safe working environment for all employees.

Policy reviewed: 10th February 2025

Due for review: 10th February 2026