

**Prevention of Harassment and Bullying Policy
Sexual Harassment Policy**

1. The Company recognise the need to create a working environment where all staff are treated with respect by their colleagues as well as by all guests, clients and suppliers. We therefore wish to create a working environment in which no person feels threatened or intimidated.
2. The Company will not tolerate any form of harassment or bullying or not tolerate any form of retaliation, violence or victimisation against any member of staff and in particular where they have brought a complaint of harassment or bullying under this policy. Staff who harass or bully any other member of staff will be subject to disciplinary action in accordance with the Company's disciplinary policy. Any such actions may amount to gross misconduct leading to termination of employment without notice.
3. It is the responsibility of all staff and managers to ensure that this policy is fully implemented and duly trained in the undertaking of the policy and its enforcement. Managers are expected to ensure that the policy is fully understood by the staff, that it is properly implemented, and that suitable disciplinary action is taken in the event of any breach of the policy.

Harassment

4. Harassment may arise in many forms, some of which are not always obvious to the individual members of staff. It will usually take the form of some unwanted behaviour by one member of staff to another. The essence of harassment is that the behaviour of the individual or individuals is unwelcome, unwanted and not reciprocated in any way. Harassment can include verbal, nonverbal or physical conduct.

Bullying

5. Bullying is a persistent course of behaviour by an individual or a group of individuals that creates a situation where people are undermined due to this threatening or intimidating behaviour. There is no single definition of what amounts to bullying.
6. Employees who become aware of a problem of this nature should ensure that they make their manager aware of the position. If an employee is subject to unwelcome conduct or remarks they should make the person aware that they find the conduct unacceptable or offensive and inform their line manager or another suitable person.
7. We recognise that complaints of harassment or bullying can be of a sensitive or worrying nature. Staff may feel unable to speak directly to their line manager. If this is the case employees may wish to speak to someone in a more senior position or to any other person. Alternatively, employees may wish to put their concerns in writing and send them to the appropriate person.
8. All staff members should treat their colleagues with respect and comply with this policy.
9. Wherever possible and appropriate, we will aim to try and resolve difficulties and concerns within the workplace through an initial informal approach. This informal approach will usually involve a meeting, individual or joint, involving the relevant parties to discuss the issues and to attempt to resolve the difficulties.
10. Where this informal approach fails, or a staff member feels that the issue is of such a serious nature that an informal approach is inappropriate, the matter will be dealt with through a formal complaint procedure in line with the grievance and appeal procedure. A formal complaint will be thoroughly investigated. Staff are

reminded that they should keep full details of the alleged concerns and be specific when raising a complaint in relation to the incident or incidents, including dates, times and parties involved where possible. All meetings necessary to investigate the facts will be undertaken.

Sexual Harassment Policy

1. Our company is committed to providing a workplace environment that is free from sexual harassment for everyone, including employees, agency workers, contractors, volunteers, and other individuals associated with our organisation. Everyone has the right to be treated with dignity and respect. We recognise that sexual harassment is a serious matter and will not be tolerated.
2. Any complaint of sexual harassment will be promptly investigated and addressed in accordance with our disciplinary procedure.
3. Sexual harassment is a violation of the Equality Act 2010 and is strictly prohibited. We have a zero-tolerance policy for such behaviour. As an employer, we are legally obligated to take proactive steps to prevent sexual harassment. We encourage all staff members to report any incidents of sexual harassment so that appropriate action can be taken.
4. This policy covers conduct in several contexts, including at the workplace; during work-related events held beyond regular hours or locations (such as business lunches, travel, or social events); outside of work when involving colleagues or associated individuals (including on social media); or any actions outside of work that might affect your fitness for your role.
5. We strongly encourage all employees (including witnesses) to report any concerns about sexual harassment to their line manager who are committed to addressing all complaints promptly and confidentially.
6. Relevant assessment of risks relating to harassment, sexual harassment and victimisation will be conducted to review risk and control management. We will also ensure that ongoing briefing regarding Sexual Harassment will be provided to all staff on recognising and preventing sexual harassment, understanding acceptable behaviour, and how to report incidents. Management will receive additional training on handling these complaints and enforcing this policy.

Definitions of Sexual Harassment

7. We define sexual harassment as any unwanted behaviour of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.
8. A colleague, an organisation representative, or a third party may engage in sexual harassment. It could happen in person, verbal or over online channels like social media. Even if they are not the intended target of the action, someone can nevertheless experience sexual harassment. Sexual harassment examples include, but are not limited to:
 - Sexual comments or jokes (including "banter").
 - Displaying sexually explicit images, posters, or photos.
 - Suggestive looks, staring, or leering.
 - Sexual advances or propositions.
 - Promises made in exchange for sexual favours.
 - Sexual gestures.
 - Intrusive questions about someone's private life or discussing one's own sexual life.
 - Sexual content in online communications, including social media.
 - Spreading sexual rumours.
 - Sending sexually explicit messages (e.g., email, text, or social media).
 - Unwelcome physical contact, such as touching, hugging, massaging, or kissing.

Definitions of Victimisation

9. Victimisation refers to treating someone unfairly because they have taken, are suspected of taking, or intend to take action protected by discrimination and harassment laws. This protection includes making a claim, helping others in a claim, or alleging a breach of the Equality Act 2010.
10. Examples of victimisation:
 - Being denied a promotion because of a previous harassment complaint.
 - Dismissal for accompanying a colleague to a harassment-related meeting.
 - Exclusion from work meetings after providing testimony in a harassment case.

Informal Complaint

11. Employees who have a complaint of sexual harassment, where possible, should discuss this with their line manager or a manager who they feel comfortable with.

Formal Complaint

12. If a complaint cannot be resolved informally, or in cases where the complaint is severe. A formal complaint should be raised in writing in confidence to a manager of your choice, with the full details of the incident.
13. Upon receipt of the complaint, it may be appropriate to separate you from the alleged employee. In this instance it will be the alleged employee who is moved to a different location, role or suspension. This decision will be made by the manager investigating the incident.
14. A formal meeting will be arranged as soon as possible, normally within 5 working days from our receipt of the complaint. Employees will have the opportunity to be accompanied at any formal meeting by a fellow employee or a Trade Union representative or official should they so wish. No other person will be allowed to attend such meetings on their behalf. Employees have a duty to make all reasonable attempts to attend any meeting arranged. Consideration will be given to adjourning any such meeting to allow for any further investigations that may be necessary.
15. Employees who are dissatisfied with the outcome of their grievance have the right to appeal. Any appeal should be submitted in writing within five working days of receipt of the letter confirming the outcome of the grievance meeting. For further information about the rights of appeal, please refer to the appeals procedure.
16. If the complaint is proven, the disciplinary procedure will be invoked against the harasser, where the outcome could be up to and including dismissal.
17. All proceedings will be dealt with confidentially and sensitively. Any breaches of confidentiality may result in disciplinary action.

Third-Party Sexual Harassment

18. We are committed to taking to steps to prevent any third-party harassment.
19. If you experience harassment, immediately raise this to your line manager or a manager of your choice. Who will take the appropriate action with the third party.
20. Where an employee of the Company has a complaint of alleged sexual harassment from a third party, this will be addressed in line with this policy.
21. If it should become clear that the policy has not been invoked by the employee as outlined above, for example, for malicious reasons or to pursue a personal grudge against another employee or the Company, this will be

dealt with in accordance with the disciplinary procedure and may in serious cases lead to the termination of employment.

Director in ChargeMatthew Moreton

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Date: 26th April 2026