



GARRION PEOPLE'S HOUSING CO-OPERATIVE LTD
FORGEWOOD HOUSING CO-OPERATIVE LTD



SEXUAL HARASSMENT POLICY

POLICY IMPLEMENTATION CHECKLIST	
Policy Guardian:	PAUL MURPHY
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Approved by Director:	14 MAY 2025
Effective From:	20 MAY 2025
Date of Next Review:	MAY 2030
Diversity compliant:	YES
Equality Impact Assessment:	LOW
Data Protection compliant:	YES
Health & Safety compliant:	YES
Procedure implemented:	YES
SDM system changes made:	N/A
Training Completed:	
Posted on Sharepoint:	
Posted on website:	

The Co-op's Objectives:

- To ensure that our resources are adequate to deliver our objectives by investing in our people, demonstrating value for money and through robust procurement practices.
- To promote social inclusion by applying principles of equality and diversity to everything we do.

Regulatory Standards:

- The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these objectives.
- The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay
- The governing body and senior officers have the skills and knowledge they need to be effective
- The RSL conducts its affairs with honesty and integrity.

Introduction

The Co-ops are committed to creating a work environment where all employees are treated with dignity and respect.

Sexual harassment and victimisation are prohibited under the Equality Act 2010, and this policy outlines the Co-op's zero-tolerance stance toward such behaviour. The purpose of this policy is to ensure all employees feel safe and supported, with clear pathways to redress should any inappropriate behaviour arise.

1. Policy Scope, Explanations or Requirements

This policy applies to all employees, workers, agency workers, volunteers and contractors of Forgewood & Garrion Housing Co-operatives, including those employed or engaged in any capacity for the Co-ops. It serves as a clear guideline for recognising, preventing, and addressing incidents of sexual harassment.

All employees are expected to contribute to a respectful and harassment-free work environment.

2. 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 an organisation, 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:

- Sexual comments or jokes, which may be referred to as “banter”
 - Displaying sexually graphic pictures, posters or photos
 - Suggestive looks, staring or leering
 - Propositions and sexual advances
 - Making promises in return for sexual favours
 - Sexual gestures
 - 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
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- Sending sexually explicit emails, text messages or messages via other social media
 - Wolf-whistling
 - Unwelcome touching, hugging, massaging or kissing
 - Making sexual remarks about someone’s body, clothing or appearance
 - Making sexual comments or jokes about someone’s sexual orientation or gender reassignment

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

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
- Excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

3. Circumstances

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 or social functions
- Outside of a work situation but involving a colleague or other person connected to the Organisation, including on social media
- Outside of a work situation where the incident is relevant to your suitability to carry out the role

4. Responsibilities

In line with the Equality and Human Rights Commission (EHRC) guidance, FHC & GPHC have developed a comprehensive Sexual Harassment Action Plan to ensure a safe, respectful workplace where all employees feel supported.

The Senior Management Team at FHC & GPHC will work within these guidelines to uphold the highest standards of behaviour and create an environment where employees feel safe to raise concerns. This plan focuses on fostering openness, addressing complaints quickly, and taking proactive action to prevent sexual harassment. This policy supports the Dignity at Work policy and the Code of Conduct.

Employees - Employees are vital in creating an open, transparent culture at FHC & GPHC. They are responsible for treating colleagues with respect and must report any behaviour that may constitute sexual harassment, either when they experience it or witness it. Employees are also encouraged to attend mandatory training sessions and read relevant materials to fully understand their responsibilities. By doing so, they help maintain a workplace where all individuals are treated with dignity.

Line Managers - Managers play a pivotal role in preventing and addressing sexual harassment. They have a responsibility to:

- Promptly and confidentially address complaints of sexual harassment or any unacceptable behaviour.
- Create a safe space where employees feel comfortable discussing issues and raising concerns without fear of retaliation.
- Investigate complaints thoroughly and impartially, ensuring that any unacceptable conduct is dealt with in accordance with FHC & GPHC's disciplinary procedures.
- Actively intervene and stop inappropriate behaviour, even if no formal complaint has been made, in line with their duty to maintain a harassment-free workplace.

Both employees and managers must act swiftly when sexual harassment occurs. Any instance of harassment, whether directly experienced or witnessed, should be reported, ensuring that FHC & GPHC's procedures are followed to protect all parties involved.

5. Monitoring & Evaluation

This policy does not constitute contractual terms and conditions. FHC & GPHC reserve the right to amend any provision of this policy subsequent to appropriate consultation.

6. Equality and Human Rights

We will not discriminate on the grounds of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, and Sexual Orientation. An Equality Impact Assessment has been carried out and none of these protected groups will be unduly affected by this Policy. The Policy applies to all.

FHC & GPHC will provide equality of opportunity and fair treatment for all, ensuring that no individual or group is treated less favourably than anyone else. We work closely with community stakeholders, to provide assurance that we are achieving these aims.

FHC & GPHC will meet, and where appropriate exceed our obligations under the Equality Act 2010, including the general equality duty in the Act, to ensure we do not discriminate against, harass or victimise a person because they have one or more of the nine protected characteristics described in the Act.

An Equality Impact Assessment has been carried out as part of the review of this policy, in order to assess where the aims of this policy may have a positive, negative or neutral impact upon any of the nine Protected Characteristics set out in the Equality Act 2010.

7. Review

FHC & GPHC undertakes to review this policy regularly, at least every five years after the initial first year review, with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice