

Title	Anti sexual harassment policy - Third party statement
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Introduction

Sexual harassment of RMT staff is **unlawful and will not be tolerated** by our business.

This document:

- provides a definition of sexual harassment (including by third parties)
- explains the preventative measures we have in place with regards to third-party sexual harassment and how we deal with complaints
- outlines how we will monitor and review our processes

To view our full company policy, please contact HR@ruthmiskin.com

Our commitment to our staff

We are committed to providing a safe and respectful workplace and promoting a working environment based on dignity and trust, and one that is free from sexual harassment.

We therefore adopt a zero-tolerance approach to all occurrences and forms of sexual harassment.

What is sexual harassment?

Harassment may be sexual in nature. The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

As an employer, we are legally obliged to take reasonable steps to prevent the sexual harassment of our employees in the course of employment, including by third parties.

What is third party sexual harassment, how do we prevent it and how do we deal with it?

Third-party sexual harassment occurs when an employee is subjected to sexual harassment by someone who is not part of our organisation but who is encountered in connection with work. This includes our customers, suppliers, members of the public, people who work at buildings where we work, who are not employed by us, clients, service users, friends and family of colleagues, delegates at a conference, audiences, self-employed contractors etc.

Third-party sexual harassment of our employees is unlawful and will not be tolerated. The law requires employers to take reasonable steps to prevent sexual harassment by third parties.

To prevent third party sexual harassment, we:

- have created a stand-alone sexual harassment policy (including third parties)
- have introduced signage to our London Head Office clearly stating that any verbal/physical abuse will not be tolerated towards our staff
- will deliver training to our employees to increase awareness amongst staff of sexual harassment, how to spot it and how to report it
- will communicate our zero-tolerance approach regarding sexual harassment of our employees to all third parties (where possible) by providing a link to the third-party statement

If an employee of ours has been subjected to third-party sexual harassment, they are encouraged to report this promptly to management or HR and will be supported throughout.

The educational establishments that we work with are considered to be clients of RMT. Should one of our employees be sexually harassed by a client's member of staff we will take action, up to and including banning the client from our services. We will fully comply with the client's investigations by sharing information relating to the incident to enable them to come to a fair and just outcome. Any criminal acts will be reported to the police.

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

We can address a third-party case of sexual harassment in several ways. Our approach will vary depending on the severity of the case and preferences of the employee involved, but we will always support and encourage action against sexual harassment.

An informal approach to remedy a complaint regarding a third party could include:

- the individual speaking directly to the third party themselves, expressing that their behaviour is not acceptable and asking them to stop
- a member of the HR team or a member of management having an informal conversation with the third party on behalf of our employee
- a member of the HR team or a member of management arranging a mediated conversation between our employee and the alleged third-party harasser

The formal approach to address a complaint regarding a third party would be to use our formal company grievance procedure.

Monitoring and review

Our sexual harassment policy, training and risk assessment is reviewed annually and, if necessary, amended to ensure that it remains effective. We analyse data around allegations of bullying or harassment (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our wider equality, diversity, and inclusion strategy. Other ways in which we monitor and evaluate the effectiveness of this policy are below:

- Logging all reported incidents
- Survey staff anonymously and regularly
- Compare reported complaints to survey feedback/exit interviews/1-1 feedback to see if there is a disparity and if action needs to be taken
- Follow up after any reported incidents to share any lessons learned and raise awareness
- Review policies, procedures and training regularly
- Regular risk assessments

Record-keeping

We process personal data collected in relation to bullying or harassment complaints in accordance with our data protection policy. Data collected in relation to the investigation of bullying or harassment complaints is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints and conducting an investigation. Any inappropriate access or disclosure of employee data in accordance with our GDPR Data protection policy should be reported promptly, as this constitutes a data protection breach. It may also constitute a disciplinary offence, which we will deal with under our disciplinary procedure.

The overall responsibility for the operation of this policy is the company CEO with elements of implementation or decision making delegated to other member of management and/or HR. Should you wish to view our full company policy on anti sexual harassment, please contact HR@ruthmiskin.com – thank you.