



Anti-Sexual Harassment Guidelines

These guidelines should be read in association with our Code of Conduct for Staff.

Kingdom will not accept any behaviour which may be considered sexual harassment. We are committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect.

This guidance covers all employees, consultants, contractors, volunteers, interns, casual workers and agency workers. It does not form part of any employee's contract of employment and we may amend it at any time.

Sexual harassment is a form of unlawful discrimination under the Equality Act 2010. It involves unwanted conduct of a sexual nature that is either meant to, or has the effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

This guideline covers not only sexual harassment in the physical workplace but also work-related environments such as when socialising with colleagues and online communications. It also covers sexual harassment by third parties such as customers, suppliers or visitors to our premises. Sexual harassment from customers will be dealt with under our Unacceptable Actions Policy which employees should make themselves aware of and, if needed, raise any issues with their line manager in the first instance so appropriate actions and supports can be put in place.

Sexual harassment can happen in any number of ways, including but not limited to:

- Written or verbal comments of a sexual nature, such as remarks about an employee's appearance, body or clothing.
- Flirting or asking questions about a person's sex life.
- Making sexual comments or jokes about someone's sexual orientation or gender reassignment.
- Making lewd or offensive jokes or comments.
- Spreading sexual rumours about a person.
- Intrusive questions about a person's private or sex life, or a person discussing their own sex life.
- Displaying or sharing pornographic or explicit images, or other sexual content.
- Sending inappropriate texts and emails to or about you.
- Emails with content of a sexual nature.
- Unwanted physical contact and touching.
- Sexual assault or rape.

When it comes to sexual harassment, it is the effect the conduct has on the victim that is important, regardless of the intention of the perpetrator. The fact that the perpetrator did not intend to cause offence or was just joking is not a defence to any form of harassment.

It is important to note that a single incident can amount to harassment. You should also note that the laws on sexual harassment protect individuals who refuse sexual advances from mistreatment because of that refusal.

All employees have a duty to step in and try to stop someone being sexually harassed at work if it feels safe to do so. You should speak to the person who's experienced sexual harassment to see if they want your support and report this to your manager, another manager or the HR Team as soon as possible.

Some types of sexual harassment, such as sexual assault and other physical threats will be considered a criminal matter and we will support the employee who has been subjected to this behaviour to report this to the Police. We will not put any pressure on an employee to make a decision, however we may contact the Police where there is an ongoing risk to your safety or safety of others and we will advise you of this.

We will take any complaints of sexual harassment very seriously and these will be handled fairly and sensitively in line with our existing disciplinary and grievance policies. If you feel you have been sexually harassed, or witness someone else being sexually harassed, it is important to report it. We can only investigate and take appropriate action if we are made aware of the conduct.

We understand that experiencing or witnessing sexual harassment can be very distressing and we will try to make the reporting of this matter as stress-free as possible. We would encourage employees to report this to their manager in the first instance but where this is not appropriate, or where you do not feel comfortable doing so, to their next in line manager, another manager or to a member of the HR Team.

Where an employee feels an issue has not been resolved or wishes to make a formal complaint they should submit their complaint in writing in line with our Grievance Policy. Your complaint should set out full details of the conduct in question, including the name of the harasser, the nature of the harassment, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far.

We will investigate complaints in a timely and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. The investigation should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

Employees who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised in this way will be subject to disciplinary action under our disciplinary process.

We also understand that it can be very distressing for an employee to be the subject of a complaint and we will offer support and deal with the situation sensitively and equitably.

Employees can be accompanied by a work colleague or a trade union representative at a meeting involving allegations of sexual harassment.

Following an allegation of sexual harassment, we will support the employee raising the complaint through a variety of options including changing work patterns, location or workload, signposting to support agencies and our employee assistance programme and granting paid time off up to a maximum of 2 weeks (normal weekly contracted hours) where appropriate. A manager has the option to grant additional unpaid leave or annual leave.

We will temporarily relocate where appropriate or suspend an employee from work who is accused of sexual harassment as outlined in our Disciplinary Policy and accompanying guidelines until the disciplinary process has been completed.

Where an employee is found to have sexually harassed another they will face disciplinary action, up to and including dismissal.

All complaints and investigations will be treated confidentially however there may be occasions where we are obliged to share information (legal or regulatory obligations). We will only share information on a need to know basis.