

3. Scope

This policy applies to:

- employees
- workers
- temporary workers
- agency workers engaged by or through Val Wade Recruitment
- consultants and contractors
- job applicants and candidates, where relevant to our processes
- anyone acting on behalf of the business

It also covers interactions with:

- clients
- candidates
- suppliers
- service users
- visitors
- members of the public and other third parties

4. What is sexual harassment?

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 them.

Sexual harassment can be a one-off incident or a pattern of behaviour. It can be physical, verbal or non-verbal, in person or online.

Examples may include:

- sexual comments, jokes, "banter" or innuendo
- remarks about someone's body, appearance or sex life
- unwanted flirting or repeated requests for dates
- intrusive questions of a sexual nature
- displaying or sharing sexual images or messages
- unwanted touching, hugging, kissing or physical contact
- sexual gestures, staring or leering
- sexual propositions, coercion or pressure
- conduct at work events or social occasions connected to work
- online harassment through email, Teams, WhatsApp, text or social media

What matters is whether the conduct is unwanted and its impact, not whether the person responsible intended to cause offence.

5. Third-party harassment

Val Wade Recruitment recognises that sexual harassment may be committed by third parties, including clients, candidates, customers, suppliers, contractors, visitors or members of the public. The law requires employers to take reasonable steps to prevent sexual harassment of workers by third parties as well as by colleagues.

We will take concerns about third-party harassment seriously and act appropriately, which may include:

- challenging the behaviour
- changing working arrangements
- removing an individual from contact
- reporting concerns to the client or relevant organisation
- ending a business relationship where appropriate

6. Roles and responsibilities

All staff and workers must:

- treat others with dignity and respect
- follow this policy and related procedures
- avoid conduct that could amount to sexual harassment
- report incidents, concerns, or risks promptly
- cooperate with any investigation

Managers must:

- lead by example
- take all complaints and concerns seriously
- respond quickly and appropriately
- escalate concerns without delay
- ensure no one suffers retaliation for reporting

Directors / senior management must:

- promote a culture of respect and safety
- assess and review risks
- ensure reporting routes are clear
- ensure appropriate training and policy review takes place
- monitor themes, complaints and actions taken

7. Reporting concerns

Anyone who experiences, witnesses, or becomes aware of sexual harassment should report it as soon as possible.

Concerns may be raised with:

- a line manager
- a director
- HR / people contact, if applicable
- the designated safeguarding or wellbeing contact, if applicable
- emma@valwade.co.uk
- 0207 3552772

Reports can be made verbally or in writing.

Where possible, reports should include:

- what happened
- date, time and location
- who was involved
- any witnesses
- any relevant messages, emails or screenshots

Val Wade Recruitment will also encourage workers to report situations where they felt at risk, even if no incident ultimately occurred, as part of taking preventative action.

8. How we will respond

All reports will be treated seriously, sensitively and as confidentially as possible.

When a concern is raised, we will:

- acknowledge it promptly
- assess any immediate safety or wellbeing risks
- consider interim steps to protect those involved
- decide whether an informal or formal route is appropriate
- investigate fairly and without unreasonable delay
- keep appropriate records
- communicate outcomes, where appropriate and lawful

No one should be pressured to deal with sexual harassment informally if they do not want to.

9. Support for anyone affected

Val Wade Recruitment will support anyone affected by sexual harassment, including where the concern has not yet been formally investigated.

Support may include:

- a confidential conversation with a manager or director
- adjustments to working arrangements
- changing reporting lines or client contact
- time away from work where appropriate
- signposting to external support services, including Acas or specialist charities

10. Victimisation and retaliation

No one will be treated badly because they:

- report sexual harassment
- support someone who reports it
- give evidence
- raise concerns about risk or culture

Retaliation or victimisation will itself be treated as a serious disciplinary matter.

11. Confidentiality

We will handle reports as confidentially as possible. Information will only be shared where necessary to investigate, safeguard individuals, or comply with legal obligations.

All parties are expected to maintain confidentiality and not discuss the matter inappropriately.

12. Consequences of breaching this policy

Any worker found to have committed sexual harassment or victimisation may face disciplinary action, up to and including dismissal or termination of engagement.

Where a third party is involved, action may include:

- formal complaint to the organisation concerned
- removal from assignments or meetings
- restriction of contact
- termination of the business relationship where appropriate

13. Prevention and risk reduction

Val Wade Recruitment will take proactive steps to prevent sexual harassment. These may include:

- clear standards of behaviour
- induction and refresher training
- risk assessment of working environments and assignments
- clear reporting routes
- guidance for work-related events and social settings
- review of complaints, themes and lessons learned
- action where workers may be at risk from third parties

14. Related policies

This policy should be read alongside:

- Equal Opportunities Policy
- Grievance Policy
- Disciplinary Policy
- Bullying and Harassment Policy
- Whistleblowing Policy
- Dignity at Work Policy
- Data Protection / Privacy Policy

15. Monitoring and review

This policy will be reviewed:

- annually, and
- sooner if there is a legal change, incident trend, or operational reason to update it

We will monitor concerns raised, outcomes, and any patterns or risks to improve our preventative approach.

Val Wade Recruitment – Sexual Harassment Policy

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