

Sexual Harassment in the Workplace

Last Reviewed: June 2026

Purpose of the policy

The Tudor Griffiths Group is committed to creating a safe, constructive working environment in which all employees are treated with dignity and respect. For this reason, we will not tolerate sexual harassment in the workplace. The Tudor Griffiths Group aim to create a culture of equality and respect between all employees.

To make sure this is understood throughout our organisation, we have created this policy for all our employees. The policy sets out:

- what we mean by sexual harassment
- how employees can report sexual harassment
- how the Tudor Griffiths Group will handle reports of sexual harassment
- the actions the Tudor Griffiths Group can take against an employee who breaches this policy
- how the Tudor Griffiths Group will support those who experience sexual harassment

Scope of the policy

This policy applies to all employees, including those who work part-time, or on fixed-term or zero-hours contracts. It covers conduct:

- at work in any capacity
- whilst in any the Tudor Griffiths Group building
- whilst using the Tudor Griffiths Group's IT systems
- in any non-working situation where they are identifiable as an employee of the Tudor Griffiths Group

This policy covers actions:

- committed by an employee of the Tudor Griffiths Group during the course of their employment
- experienced by any employee of the Tudor Griffiths Group during the course of their employment
- committed in person and online

Roles and responsibilities

Senior managers

Senior managers have overall responsibility for this policy and will make sure:

- this policy is regularly shared with all employees
- it is known that the Tudor Griffiths Group has a zero-tolerance approach to sexual harassment
- employees receive relevant sexual harassment training

Line managers

Anyone who manages employees must also:

- support and encourage employees to tell them about any instances of sexual harassment
 - foster a safe working environment
 - understand how to handle reports of sexual harassment
 - understand when conduct must be reported to the police
- provide employees who report sexual harassment with confidential support and advice

All staff

Everyone in the Tudor Griffiths Group is responsible for implementing the policy. To make this happen, employees at all levels must:

- take responsibility for their own behaviour
- behave in line with the Tudor Griffiths Group's values
- respect and support their peers
- report any sexual harassment they experience
- report any sexual harassment they witness

This policy will be reviewed annually, or sooner where required, to ensure it remains compliant with legislation and reflects current organisational practices.

What is sexual harassment?

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of:

- violating someone's dignity, and/or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for that person

Unwanted conduct of a sexual nature includes a wide range of behavior. A non-exhaustive list of examples include:

- sexual comments or jokes
- sexist jokes
- displaying sexually graphic pictures
- suggestive looks, staring or leering
- propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person's sex life or discussing your own sex life
- sexual posts or contact on social media
- spreading sexual rumours about someone
- sending sexually explicit emails or texts
- unwelcome touching, hugging, massaging or kissing
- criminal behaviour, including sexual assault, stalking, indecent exposure and offensive communication

There are clear protections against sexual harassment in the workplace under the Equality Act 2010 (for the UK)

Victimisation (in the context of sexual harassment) is when someone is treated badly because:

- they complain about sexual harassment
- it's believed they will complain about sexual harassment
- they help someone report sexual harassment

Victimisation is also unlawful under the discrimination laws in UK.

Training

The Tudor Griffiths Group will provide its managers with sexual harassment training which will cover:

- what sexual harassment is
- what types of behaviour class as sexual harassment
- what to do if employees experience or suspect sexual harassment
- how employees can raise a complaint and how it will be dealt with
- how to contribute to a positive workplace culture to help prevent sexual harassment

Line managers will also be trained on how they can contribute to a safe working environment.

Addressing the risk of sexual harassment in the workplace

The Tudor Griffiths Group will do the following to assess and tackle sexual harassment in the workplace:

- perform sexual harassment risk assessments regularly or when:
 - something changes, such as a new process or procedure
 - an incident of sexual harassment occurs
- address hazards identified by the sexual harassment risk assessment
- consider and regularly review its policy on personal relationships between employees (in particular, relationships that have an unequal power dynamic such as between junior and managerial staff)
- monitor sex-related workplace issues which lead to inequality like the gender pay gap and unequal pay
- adopt a zero-tolerance approach to sexism within the workplace which is reflected through its policies, procedures, culture and training
- foster and promote a safe working environment which allows employees to feel safe and secure

Confidentiality relating to sexual harassment reports

Every employee has the right to discuss or report sexual harassment confidentially.

In some cases, we might need to share information about the employee who made the complaint or during an internal investigation. Where this is the case, we'll consult with the employee beforehand and make sure this is done confidentially. We will at all times comply with any data protection responsibilities.

We will not tolerate the victimisation of employees who:

- make a report about sexual harassment in good faith
- contribute to an investigation

Those who victimise an employee for one of the above will face disciplinary action.

Reporting sexual harassment

Employees should report all instances of sexual harassment to their line manager.

Those who experience or witness sexual harassment should keep a record of the incident or incidents. This will help with investigations if the matter is formally reported. This includes logging:

- the date and time of incidents
- details of who was involved
- details of what happened
- details of any witnesses

Informal process

Someone who has experienced or witnessed sexual harassment may feel comfortable trying to resolve the matter informally. They might want to:

- arrange an informal, confidential chat with their line manager and ask for advice and support
- speak to the person who carried out the sexual harassment and try to make them understand the effect their actions have had
- speak to the person who carried out the sexual harassment in the presence of a manager to try and make them understand the effect their actions have had
- ask a manager to speak to the person who carried out the sexual harassment

The Tudor Griffiths Group will fully support someone who wants to resolve the matter informally.

Formal process

In some circumstances the person who experiences or witnesses sexual harassment may want to formally report the matter. This might include:

- raising their concerns using the Tudor Griffiths Group's grievance procedure - this can be found in the TG policies section of the Tudor Griffiths Group Intranet. If they do not have access, a copy can be obtained from their line manager
- making a claim at an employment tribunal
- reporting the matter to the police

Legal action

In some instances, sexual harassment could be considered a criminal offence. The Tudor Griffiths Group will respect the decision of the person whether they wish to report it to the police or not. If the matter is reported to the police, the Tudor Griffiths Group will help them with the investigation where it can.

Investigation, record keeping and data protection

Investigating allegations

If an incident of sexual harassment is not resolved informally, the Tudor Griffiths Group will perform a confidential investigation into the allegations.

The Tudor Griffiths Group will:

- interview everyone involved
- consider the circumstances surrounding the allegations
- consider the reporting person's feelings and perception of the conduct
- establish if the conduct can be defined as sexual harassment

If allegations are upheld, the Tudor Griffiths Group will decide what action will be taken next. This could be disciplinary action or a report to the police. Once a decision on action has been made, the Tudor Griffiths Group will update the:

- reporting person
- victim (if they didn't make the initial complaint)

Record keeping and data protection

The Tudor Griffiths Group will keep a record of all reports of sexual harassment.

The information regarding the complaint will be kept on the HR files of those involved including:

- the victim
- the perpetrator
- relevant witnesses (where appropriate)

Information on a reported act of sexual harassment will be kept confidential and only discussed and shared with those:

- who need to know
- involved in the report

In some cases, the Tudor Griffiths Group might report the conduct and share information with the police even if the victim does not want to. We will take this type of action if an incident involves:

- a hate crime
- physical violence
- sexual assault

When we take this kind of action, we will always consult the victim of the abusive conduct before a report is made.

All information gathered, recorded and stored will comply with the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR), as applicable.

Actions we will take against an employee who breaches our policy

If an employee breaches this policy, and we have sufficient evidence they've done so, they will face disciplinary action. We will take this action in line with our disciplinary procedure, which can be found on the Tudor Griffiths Group Intranet. If the employee does not have access to this, a copy can be obtained from their line manager.

Action will also be taken against those who make false allegations of sexual harassment or allegations in bad faith which are found to be untrue.

If we consider an employee's behaviour to have breached this policy and be gross misconduct, this will usually result in dismissal without:

- notice
- payment in lieu of notice

Sexual harassment by a third party

An employee might experience sexual harassment by a third party such as a customer or supplier. We will not tolerate sexual harassment of our employees by any third party. The Tudor Griffiths Group will take steps to prevent sexual harassment by third parties. This could include but is not limited to:

- make it clear to our clients, customers or supplier and others who work with us that sexual harassment of our employees is unacceptable e.g. by recording messages at the beginning of telephone calls or displaying notices
- formally report any incidents by third parties to the relevant person within the third parties organisation
- carrying out risk assessments when planning events attended by third parties
- reviewing this policy
- reviewing risk assessments
- reviewing other relevant policies and procedures

If a complaint of third-party harassment is received, we will seek to investigate the allegation and may:

- warn the client, customer or supplier about their behaviour
- ban them from our premises
- report any alleged criminal acts to the police
- share information with other branches of the organisation

Monitoring after the complaint and investigation

Once an investigation into sexual harassment has been completed, the Tudor Griffiths Group will actively monitor the issue for a short period of time. This is to make sure:

- the reported behaviour has stopped if the perpetrator has not been dismissed
- no one is treated unfairly because they either made or supported a complaint

If there is a recurrence of sexual harassment or unfair treatment following on from an incident already reported, the Tudor Griffiths Group will re-engage this policy.

Support for those who experience sexual harassment

The Tudor Griffiths Group is committed to making sure victims of sexual harassment:

- feel safe discussing what has happened to them
- are supported through the reporting process
- are supported after the report has been made

To do this the Tudor Griffiths Group will:

- make sure adjustments are made for the victim including time off for counselling or to take legal advice, if required
- ask the victim to what the Tudor Griffiths Group can do to help them
- provide information of where they can find support outside of the Tudor Griffiths Group