

# Anti-Harassment Policy

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**Author**

Suzanne Tilling

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**Version**

V11

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**Equality Impact Assessed**

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**Approved by**

Thomas Harley

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Public



**for a  
better  
tomorrow**  
A Palladium Company

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## Introduction

**Get Set UK seeks to provide an environment in which all learners and employees are treated with respect and dignity and which is free of harassment based upon an individual's race, religion, religious belief, colour, sex, age, national or ethnic origin, disability or sexual orientation. Employees and learners/participants must not harass or intimidate any learner/participant/employee on these grounds. Such harassment not only contravenes the Company's policy but it may also constitute unlawful discrimination. Such behaviour will be treated as gross misconduct in accordance with the Company's disciplinary procedure and could render an employee liable to summary dismissal, or a learner/participant to be removed from the programme.**

All employees are responsible for conducting themselves in accordance with this policy and the Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.

Employees must not victimise or retaliate against a learner/participant or employee who has made allegations or complaints of harassment, or provided information about such harassment. Such behaviour will be treated as gross misconduct in accordance with the Company's disciplinary procedure. Employees should support colleagues who suffer such treatment and are making a complaint.

## Sexual Harassment

It is against the Company's policy for any employee to sexually harass a learner/participant or another employee or to harass them on the grounds of their sexual orientation. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favours, engaging in other unwelcome verbal or physical conduct of a sexual nature, subsection to obscene or other suggestive comments, and sexual jokes or pictures. It is for the complainant to decide for themselves what they regard as offensive.

## Racial Harassment

It is against the Company's policy for any employee to harass a learner/participant or another employee on the grounds of their race, religion, colour or national origin. Racial harassment includes, but is not limited to, engaging in unwelcome verbal or physical conduct of a racial nature, subsection to racist comments, and racist jokes or pictures. It is for the complainant to decide for themselves what they regard as offensive.

## Stalking

Stalking is described as a situation where one individual inflicts on another repeated unwanted intrusions and communications which may arouse concern and fear and compromise safety. The following are examples of stalking behaviours:

- Watching/maintaining surveillance/following someone.
- Standing/staring at or loitering near victim.
- Driving by person's home/workplace.

- Telephoning/mailing/emailing/leaving graffiti.
- Taking photographs without permission.
- Giving unwanted gifts.
- Sending bizarre or sinister items to the victim's location.
- Sending any items to a private address.
- Inappropriate researching a learner/participant or member of staff's private history, e.g. via internet or social media.

For the purpose of this policy and its related procedures, the term stalking involves more than one incident directed towards a victim. This low numerical threshold allows stalking to be addressed quickly, which may help prevent escalation of the behaviours. Where there is a single serious incident a decision may be made to invoke this policy and procedure without waiting for a second incident to occur. Stalking can escalate to include a range of associated offences including:

- Death threats/suicide threats.
- Criminal damage/vandalism.
- Refusing to accept professional relationship is over.
- Confining a person against their will.
- Verbal threats/gesturing or acts of symbolic violence.
- Sexually unwanted behaviours.
- Sexual and/or violent assault.

If a member of staff feels they are being stalked they should inform their Line Manager immediately. If it is found that a member of staff is the stalker then such behaviour will be treated as gross misconduct in accordance with the Company's disciplinary procedure.

## Other Harassment

It is against the Company's policy for any employee to harass another employee on the grounds of his or her disability, age, gender or sexual orientation.

In addition, conduct relating to a person's status or other characteristic which has the purpose or effect of unreasonably interfering with an employee's work performance, or creating an intimidating, hostile or offensive working environment constitutes harassment. Examples of such conduct can include, but are not limited to, epithets, ridicule of individuals on the basis of their status or other verbal, physical or visual abuse or conduct based on status.

## Reporting and Investigation of Complaints

While the Company encourages learners/participants and employees who believe they are being harassed to notify the offender (by words or by conduct) that their behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical. In the event that such informal, direct communication between learners/employees is either ineffective or impractical, the following steps should be followed in reporting a complaint of harassment:

## For Learners/Participants:

Contact one of the designated safeguarding personnel, or submit the safeguarding form at Appendix 3 of the Safeguarding Policy, at [safeguarding@getsetuk.co.uk](mailto:safeguarding@getsetuk.co.uk).

The designated safeguarding personnel are:

- Allocated Board Level responsibility: **Thomas Harley, CEO/Director**
- Group Designated Safeguarding Lead (DSL): **Suzanne Tilling, Director of Service Improvement and Strategic Projects** (Member NADSL and Director of 2 Domestic Violence Organisations)
- Deputy Designated Safeguarding Lead (DDSL): **Lee Bird**
- Designated Safeguarding Officer (DSO) for Apprenticeships: **Andrea Gregory**
- DSO for Employability contracts: **Nishma Shah**
- DSO for IPS and Inclusive Support - **Sally Howell**
- DSO for Education and Training – **Lee Bird**

## For Employees:

1. Any employee who believes they have been or are being harassed in violation of this policy, or who wishes to report an incident of harassment, should speak to their line manager. If the employee does not wish to speak to their line manager, they can instead speak to any other manager whom they feel comfortable with or a Safeguarding Officer.
2. Such reports should be made promptly so that investigation may proceed and any action taken expeditiously.
3. All allegations of harassment will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly complaints of harassment. The allegation will be promptly investigated. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of the allegation.
4. The complainant will be informed of the outcome of the investigation and the Company's conclusions. The Company is committed to taking appropriate action with respect to all complaints of harassment.

## Disciplinary Action

Any employee of the Company who is found to have harassed a learner/participant or another employee in violation of this policy will be subject to appropriate disciplinary action under the Company's disciplinary procedure. Such behaviour will be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line managers who had knowledge that such harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

## Policy review

This policy shall be reviewed annually and amended accordingly at intervals not exceeding 12

months.

## Version control

<b>Version</b>	<b>Date</b>	<b>Purpose / Changes</b>	<b>Author</b>
V2	01/04/18	Review	Phil Henderson
V3	01/04/19	Update Covid Guidance, review	Phil Henderson
V4	01/05/21	Update Covid Guidance, review	Phil Henderson
V5	01/08/21	Update Covid Guidance, reformatting and review	Cat Barton
V6	01/08/22	Annual Review	Cat Barton
V7	02/08/23	Annual Review	BV - Permaul
V8	02/09/23	Updated job titles	BV - Permaul
V9	01/10/23	Annual Review	Cat Steel
V10	01/10/24	Annual Review / Job Titles	Susan Feltham
V11	01/09/25	Annual Review / Job Titles	Cat Steel