



Sexual Harassment Statement

IMS-STM-02

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Responsible individual/team: HR Manager

Company Proprietary Information

The electronic version of this procedure is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this manual is uncontrolled, except when provided with a document reference number and revision in the field below:

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1. Purpose

The purpose of this statement is to prevent sexual harassment in the workplace and should be read in conjunction with the Company's Dignity and Respect at Work policy.

This statement outlines the Company's commitment to provide a safe and respectful work environment for all employees, free from unwanted conduct of a sexual nature. Sexual harassment will not be tolerated by employees or third parties and is unlawful.

This statement applies to everyone in our organisation including employees, workers, contractors and volunteers.

2. Individual responsibilities

Employees are expected to:

- Ensure they understand this policy, along with our Dignity and Respect at Work policy and act in accordance with them.
- Treat all individuals with respect and refrain from engaging in any form of sexual harassment.
- Not participate in, encourage or condone sexual harassment or victimisation of others.
- Report any incidents of sexual harassment they experience or witness.
- Cooperate with any investigations into complaints of sexual harassment.
- Comply with the Company's expectations regarding workplace conduct, further details of this can be found in our Dignity and Respect at Work policy.
- Attend training when requested.

3. Company responsibilities

The Company has a legal obligation to take reasonable steps to prevent sexual harassment in the workplace. To proactively prevent sexual harassment the Company:

- Has implemented and will regularly review this sexual harassment statement.
- Has made this statement accessible to all employees without having to request a copy. A copy can be found on Bright HR under Documents>Lemon Reinforcement>Policies and Procedures.
- Will provide regular training to all employees on sexual harassment in the workplace and keep a record of all training provided.
- Has established a number of clear reporting channels for employees to raise concerns.
- Ensures that all complaints are handled promptly, fairly, and confidentially.
- Conducts regular risk assessments to identify potential areas where sexual harassment could occur.
- Has an open-door policy for employees to speak to management about any concerns they have.
- Deals with complaints, either informal or formal, in a timely manner.
- Ensures that parties found to have sexually harassed another will be dealt with in line with Company policies and procedures.

4. Definition and examples of sexual harassment

Sexual harassment is defined as any unwanted behaviour of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Discrimination law also recognises sexual harassment as something separate to sex (i.e. female or male) harassment. Sexual harassment occurs when someone is subjected to unwanted conduct of a sexual nature or when a person is treated less favourably because they have accepted or rejected unwanted conduct of a sexual nature.

Examples of Sexual Harassment include:

- Making sexual comments about someone's body, clothing, or appearance.
- Telling sexual jokes.
- Displaying or having in your possession sexually graphic pictures, posters or photos.
- Suggestive looks, staring or leering.
- Propositions and sexual advances.
- Making promises in return for sexual favours.
- Sexual gestures.
- Intrusive questions about a person's private or sex life, or a person discussing their own sex life.
- Sexual posts or contact on social media.
- Spreading sexual rumours about a person.
- Sending sexually explicit emails or text messages.
- Unwelcome physical contact such as touching, hugging, massaging or kissing.
- Pursue or flirt with another person persistently without the other person's willing participation or flirting with someone at an inappropriate time (e.g. in a team meeting) is considered sexual harassment, even when these advances would have been welcome in a different setting. This is because such actions can harm a person's professional reputation and expose them to further harassment.

Please note this list is not exhaustive and reference should also be made to the Dignity and Respect at Work policy.

Anyone can experience sexual harassment, and an individual can experience sexual harassment from someone of the same sex or a different sex. The conduct does not have to be directed at someone for them to experience or report sexual harassment.

5. Reporting Sexual Harassment

You are encouraged to report any sexual harassment you are a victim of, or witness, as soon as possible and in accordance with the reporting procedure detailed in our Dignity and Respect at Work policy.

All reports of sexual harassment will be investigated promptly and thoroughly. The investigation will be conducted in a fair and impartial manner, respecting the confidentiality of all parties involved. Based on the investigation, appropriate action will be taken, which may include disciplinary measures against the perpetrator, up to and including termination of employment.

6. Support, Protection and Training

The Company is committed to supporting individuals who report sexual harassment. This may include:

- Protecting individuals from victimisation or retaliation as a result of making a complaint.
- Ensuring confidentiality throughout the investigation process.
- Being a Company Supporter of the Lighthouse Construction Charity where individuals can go for free, confidential help.

Individuals can also contact the following third parties directly for support:

- [Lighthouse Construction Charity](#)
- [Rights of Women](#)
- [SafeLine](#) National Male Survivor Helpline
- [Galop](#) the LGBT+ anti-violence charity
- [Samaritans](#)

- [Rape Crisis](#) England and Wales
- [Victim Support](#)

Regular training sessions, via iHasco, will be conducted with employees and management to ensure all employees understand the statement and their responsibilities. Training will include:

- A clear understanding of what harassment is.
- Definitions and examples of sexual harassment.
- The importance of maintaining a respectful and inclusive workplace culture.
- An understanding of what is appropriate and what isn't in 'grey' areas such as banter.

7. Housekeeping and Maintenance

The statement will be monitored annually by the HR Manager and Directors, and any necessary updates will be proposed to employees where required, following agreed consultation arrangements. The statement will be updated automatically and without consultation when there are changes in the law or employment regulation.

Amendment record

Listed below is a brief audit trail, detailing amendments or actions made to this statement.

Page No.	Context	Revision	Date
All	Review with directors	001	11/03/2025
All	New issue	001	08/04/2025