

**Sexual Harassment Policy**

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**Purpose**

OneCall24 Limited is committed to ensuring that all its staff and applicants are treated with dignity and respect and treat others in the same way. We believe that all staff and applicants have the right to work in an environment which is free from any form of harassment, including sexual harassment.

OneCall24 Limited has a zero-tolerance approach to sexual harassment.

OneCall24 Limited is committed to ensuring that reasonable steps are taken to prevent sexual harassment to all employees, workers, and applicants. This policy will be reviewed and updated from time to time to ensure OneCall24 Limited's compliance with its duties under the Equality Act 2010 as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023 to ensure that all reasonable steps are taken to prevent sexual harassment.

The Compliance Manager has day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance. Staff should disclose any instances of harassment, sexual harassment or bullying of which they become aware to their line manager. If the allegations of sexual harassment relate to their line manager then they should disclose any instances to the Compliance Manager.

This policy does not form part of the employee's contract of employment and may be amended at any time.

**Objectives**

- To ensure a working atmosphere free from sexual harassment of any kind.
- To ensure that all members of staff are not subject to sexual harassment in the

course of their employment.

- To ensure that all staff members are aware that Onecall24 Limited takes all allegations of sexual harassment seriously and will not hesitate to invoke the Discipline Policy and
- Discipline and potentially dismiss any perpetrator should the allegations be found to be true.

### **What is sexual harassment?**

- Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or the effect of:
  - violating the victim's dignity; or
  - creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.
- An individual of any gender may be the victim of sexual harassment.
- The conduct need not be sexually motivated, it only needs to be sexual in nature.

Whilst not an exhaustive list, forms of sexual harassment can include:

- Slurs or unwanted sexual advances;
- Visual conduct such as derogatory or sexually oriented pictures, photos or posters;
- Physical conduct such as assault, unwanted touching, or any interference because of sex, race, or any other protected characteristic basis;
- Threats and demands to submit sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours;
- Sexual comments or jokes;
- Unwelcome touching, hugging, massaging, or kissing;
- Suggestive looks, staring or leering;
- Sexual gestures;
- Intrusive questions about a person's private or sex life, or a person discussing their own sex life;
- Spreading sexual rumours about a person;
- Sending sexually explicit emails or text messages

Sexual interaction that is invited, mutual or consensual is not sexual harassment (because it is not unwanted), but situations change and sexual conduct that has been consensual in the past may become unwanted. A person can experience unwanted conduct from someone of the same or a different sex.

### **Examples of sexual harassment**

A male worker alters a pornographic image by pasting an image of his female colleague's face on to it. He then sends it to their other colleagues, causing them to ridicule her. There was no sexual motivation behind this act, but the use of the image is sexual in nature.

A female worker has a brief sexual relationship with her supervisor. The worker tells her supervisor that she thinks it was a mistake and does not want the relationship to continue. The next day, the supervisor grabs the worker's bottom, saying 'Come on, stop playing hard to get'. Although the original sexual relationship was consensual, the supervisor's conduct after the relationship ended is unwanted conduct of a sexual nature.

Male workers download pornographic images to their computers in an office where a woman works. She may make a claim for sexual harassment if she is aware that the images are being downloaded and the effect of this is to create a hostile and humiliating environment for her. In this situation, it is irrelevant that the male workers did not intend to upset the woman, and that they considered the downloading of images to be 'having a laugh'.

### **Procedure: Informal Process**

Any allegation of sexual harassment will be dealt with seriously, promptly and in confidence. Employees who feel they have been subject to sexual harassment must not hesitate in using this procedure, and they should not fear victimisation. Retaliation against an employee who brings a complaint of sexual harassment is in itself a serious disciplinary offence which may constitute gross misconduct and could result in dismissal. You may prefer to try to resolve the matter on an individual basis, if you feel able to do so. In some cases it may be possible for the affected person to explain clearly to the perpetrator that the behaviour in question is not welcome, that it offends them, makes them uncomfortable or interferes with their work, and that they want it to stop—and this may be enough to make it stop. However, the affected person may not always feel able to take this step, and in more serious cases it will not be appropriate.

The affected member of staff should submit it in writing to their line manager or main point of contact (if self-employed). If the matter concerns their line manager or main point of contact, they should submit it to the Compliance Manager or HR Department (where applicable).

The written 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 to attempt to stop it from occurring.

As a general principle, the decision whether to progress a complaint is up to the affected member of staff. However, Onecall24 Limited has a duty to protect all staff and may pursue the matter independently if, in all the circumstances, it considers it appropriate to do so.

**Procedure: Formal Process**

Following receipt of a formal complaint of sexual harassment, the member of staff's line manager or another nominated person with appropriate experience and no prior involvement (where possible) will undertake an impartial and objective investigation into the allegations raised.

Onecall24 Limited may arrange a meeting with the affected member of staff, usually within one week of receiving the formal complaint, so that they can give their account of events. The affected employee will be allowed to bring a colleague or a trade union representative to the meeting with them.

Any incident of sexual harassment, should be immediately reported to the head of Compliance or the Head of Human Resources and followed by a written complaint as soon as possible after the incident. The written complaint should include:

- Details of the incident,
- Name(s) of the individual(s) involved,
- Name(s) of any witness(es).

Onecall24 Limited will ensure that any necessary steps are taken to manage the relationship between the employee making the accusation and the individual the allegations are made about. This may include temporary adjustments in working arrangements, where appropriate. Any details of the investigation, including the names of individuals involved, will only be disclosed on a need-to-know basis. Onecall24 Limited will maintain the utmost confidentiality where possible.

Once Onecall24 Limited has completed its investigation, the employee will be informed of the outcome of the investigation. If the alleged harasser is a fellow employee, Onecall24 Limited will look to deal with the potential misconduct or gross misconduct offence under the Discipline Policy and Procedure. As per usual practice, the outcome of the disciplinary process is at the determination of Onecall24 Limited and the affected employee cannot dictate what action is to be taken.

In cases where the alleged harasser is a temporary agency worker, Onecall24 Limited will not comply with instructions from a hirer or intermediary that could lead to further harassment or victimisation of the worker involved.

Onecall24 Limited may explore, in certain cases, the feasibility of mediation between the parties involved. This may be accompanied by additional training for the alleged harasser, either internally or externally. All staff are encouraged to consider engaging in mediation where it is offered as a solution, although Onecall24 Limited recognises that mediation will not always be appropriate.

Where the unwanted behaviour has stemmed from a third party, Onecall24 Limited will

look to clarify the behaviour expected of their representatives or, in very serious cases, ban them from the premises and/or terminate the contract with them.

Where the unwanted behaviour has stemmed from a Client, the member of staff should bring this to the attention of their line manager as soon as possible. OneCall24 Limited will investigate and take appropriate action to resolve the issue where an offense has occurred.

Whether or not the employee's complaint is upheld, OneCall24 Limited will consider how best to manage any ongoing working relationship between the employee and the person concerned.

### **Anonymous Reporting**

OneCall24 provides a confidential and anonymous reporting platform for employees who prefer not to disclose their identity.

Individuals may log a report anonymously through the following link: [Anonymous Reporting](#) or visit the company's website via <https://onecall24.co.uk> to log an anonymous report.

Alternatively, please contact us through the following number: 03333 22 11 22 to log your anonymous report. You may call via a hidden number to maintain the anonymity.

### **Third party sexual harassment**

In your work, you may have contact with third parties, such as customers, service users and or suppliers. We will not tolerate sexual harassment of our staff by any third party. As with any harassment or bullying, if you experience or witness harassment by a third party, we would urge you to report it.

We will take the following reasonable steps to prevent harassment by third parties:

- To make it clear to our customers, service users, suppliers and others who work with us that sexual harassment of our staff is unacceptable, we will implement the following measures:
  - Display anti-harassment policies prominently in public-facing areas, such as reception desks, waiting rooms, or service areas.
  - Include statements in new contracts, new agreements, and terms of business outlining zero-tolerance for sexual harassment.
  - Establish a clear and accessible process for staff to report incidents of harassment.
  - Enforce strict consequences for violations, which may lead to termination of contracts or banning individuals who engage in harassment.

- Use signage with messages like “We are committed to a safe and respectful environment—sexual harassment will not be tolerated” in visible areas.
- provide regular training for managers and staff to raise awareness of rights related to sexual harassment and of this policy;
- provide specific training for managers to support them in dealing with complaints;
- take steps to minimise occasions where staff work alone;
- where possible, ensure that lone workers have additional support;

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

- Warn the third party about their behaviour;
- When dealing with service users with conditions such as dementia or learning difficulties, approach warnings with sensitivity, ensuring that communication is adapted to their understanding and needs.
- Ban them from our premises;
- Report any alleged criminal acts to the police;
- In cases where the individual’s condition may affect their understanding of their actions, communicate with the appropriate authorities or safeguarding teams to ensure a fair and balanced approach.
- Offer support to the staff member involved, such as counselling, temporary reassignment, or adjustments to their working environment.
- Provide staff with specific training on managing challenging behaviour from service users with dementia, learning difficulties, or other conditions, ensuring they feel equipped to handle such situations safely and respectfully.

### **Sexual Harassment: OneCall24 commitment**

OneCall24 Limited will take reasonable steps to safeguard temporary workers it supplies and internal members of staff from sexual harassment.

OneCall24 Limited will ensure that the hirer/end client has a sexual harassment policy in place, and this is given to their employees and workers.

OneCall24 Limited will ensure that all staff are given training on sexual harassment, and that regular training is provided to all staff on sexual harassment on a yearly basis.

OneCall24 Limited will carry out due diligence checks on hirers/intermediaries who we engage in the supply of temporary agency workers to ensure that they are taking reasonable steps to carry out their duties as employers under the Equality 2010.

All employees and workers will be expected to comply with OneCall24 Limited’s policy on

sexual harassment in the workplace. Any breach of such a policy will lead to appropriate disciplinary action.

Employees who Onecall24 Limited finds to be responsible for sexual harassment will be subject to disciplinary procedures and the sanction may include termination.

Temporary workers who Onecall24 Limited finds to be responsible for sexual harassment will be subject to our complaints procedure even where such sexual harassment involves individuals who are not engaged by Onecall24 Limited

### **Appeals**

If the affected employee is not happy with the outcome of the investigation, they may appeal to Compliance Manager or the Board of Directors (where applicable) within seven days. The letter must state the full reasons for the appeal.

Onecall24 Limited will arrange an appeal meeting with the affected employee usually within seven days of receiving the appeal letter. The appeal will be carried out by a manager who has not previously been involved with the investigation.

The affected employee will be allowed to bring another employee or a trade union representative to the meeting with them.

Following the meeting, Onecall24 Limited will write to the affected employee with their decision. This will usually be within seven days. There will be no further right of appeal after this decision.

Please note that any employee who deliberately provides false information or acts in bad faith as part of the investigation process will be subject to action under the Discipline Policy and Procedure at Onecall24Limited.

Onecall24 Limited may keep information about a complaint by or about an employee on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

### **Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.