

Third-Party Sexual Harassment Policy

Should you need to report an incident of sexual harassment or seek support, please don't hesitate to reach out via email or phone. You are not alone—whether you need to report an issue or simply talk to someone, support is available. If you'd like to reach out to the HR team, please use the contact details below. Alternatively, you can reach out to your Line Manager:

- *Malinda Gibson, HR Business Partner*
- *Email: malinda.gibson@abgi-uk.com*
- *Contact Number: 028 9544 2935*

Introduction

All members of staff are entitled to be treated with dignity and respect in their place of work. This means freedom from behaviour by third parties, such as customers/clients or suppliers, that can be interpreted as bullying or harassment or that causes offense and access to redress if such behaviour does arise.

This policy will be reviewed regularly to ensure it remains up to date and to monitor its effectiveness.

Third-party harassment

Third-party harassment occurs when one of our workforce is subjected to harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes our customers, suppliers and members of the public. Third-party harassment of our workforce will not be tolerated.

Conduct becomes harassment if it persists and it has been made clear that it is regarded as offensive by the recipient or a witness to the conduct, although a single offensive act can amount to harassment if it is sufficiently serious.

Scope

We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic to all those who work for us. This includes employees, workers, agency workers, volunteers and contractors in all areas of our Company, including any overseas sites.

For more information on bullying and harassment, please read our separate Anti-Harassment and Bullying Policy. For information on sexual harassment, please read our separate Sexual Harassment Policy.

Circumstances which are covered

This policy covers behaviour by third parties towards a member of our workforce which occurs in the following situations:

- a work situation
- a situation occurring outside of the normal workplace or normal working hours which is related to work, e.g. a working lunch or a social event with colleagues
- outside of a work situation but against a colleague or other person connected to the Company, including on social media.

Action to prevent third-party harassment

We take a zero-tolerance approach to third-party harassment of our workforce. Any complaints of third-party harassment will be taken seriously and thoroughly investigated.

In order to prevent third-party harassment from occurring and encourage staff to report any concerns, we will:

- Attach signage to the walls of the areas within the workplace to warn that sexual harassment of our staff is not acceptable.
- Make this policy available to Third-Parties through our Company website.
- Ensure that all staff receive comprehensive training and refresher courses on sexual harassment prevention and response.
- Ensure that any issues with clients are recorded.

Should a client harass a member of our workforce, they will be warned that continued provision of our service to them will cease if they are to act in a similar way again. Should their behaviour recur, they will be informed that our service to them will cease. Any criminal acts will be reported to the police, and we will share information relating to the incident with our other branches to ensure that we maintain a consistent approach to the cessation of our services.

What to do if you or a colleague are subject to third-party harassment

We recognise that complaints of sexual harassment can be of a sensitive or intimate nature. In these circumstances, you are encouraged to raise such issues with HR or your Line Manager.

If possible, you should keep notes of what happened so that the written complaint can include:

- the name of the alleged harasser
- the nature of the alleged harassment
- the dates and times when the alleged harassment occurred
- the names of any witnesses
- any action already taken by you to stop the alleged harassment, for example have you spoken to the named individual or a manager

On receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve asking the alleged harasser to not attend the office for a temporary period of time during the investigation.

The HR department will handle the complaint by inviting you to attend a meeting, to discuss the matter and carry out a thorough investigation. The meeting will normally be held within five working days of receipt of your complaint. You have the right to be accompanied at such a meeting by a trusted colleague of your choice and you must take all reasonable steps to attend.

On conclusion of the investigation, which will normally be within 10 working days of the meeting with you, the decision of the investigator, detailing the findings, will be sent in writing to you.

You have the right to appeal against the findings of the investigator in accordance with the appeal provisions of the grievance procedure.

Training

We provide training to all our staff on harassment, training will be required on a 2-year basis.

Employee Assistance Programme

- We would like to remind you that further support is available by contacting our Employee Assistance Programme (EAP), a confidential 24-hour telephone counselling service with *Aviva Smart Health*, which can be accessed by telephone on **02034990167**. *Please use the company access code LGO17310.*

As part of our EAP, you also have access to a wide range of other support services.

More details of this service are available from the Company Intranet.

Review schedule

Review interval	Documentation creation	Next review due by
2 years	October 2024	October 2026

Contacts

Position	Name	Email
HR Business Partner	Malinda Gibson	malinda.gibson@abgi-uk.com

Communications and Training

Will this document be available externally?	Yes
Will training needs arise from this policy	Yes
If yes, please give details Training for all staff is essential upon joining the business, including refresher training every 2 years.	