

Sexual Harassment Policy

1. Introduction

1.1 This policy applies to all UK employees within Protection Services (UK) Ltd ("the Company"). The policy sets out minimum expected standards. Some clients will require compliance with additional or stricter criteria and in these situations the contract requirements take precedence. Local rules/agreements should also be taken into consideration in conjunction with this policy.

1.2 This policy does not form part of any employee's terms and conditions of employment. The Company will review and may amend this policy from time to time.

2. The Policy Statement

2.1 The Company is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. The Company will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

2.2 All complaints of sexual harassment will be taken seriously and treated with respect and in confidence.

2.3 No one will be victimised for making such a complaint.

2.4 The Company will ensure that this policy is widely disseminated to all

relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the company.

2.5 Every year, The Company will require all employees to attend a refresher training course on the content of this policy.

2.6 It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

2.7 The Company recognises the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

2.8 Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

3. Definition of sexual harassment

3.1 Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

3.2 Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

3.3 Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

3.4 Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

3.5 Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

3.6 Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. The Company recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

3.7 The Company recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for

example between manager or supervisor and employee.

3.8 Anyone, including employees of UniTrust's clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

3.9 All sexual harassment is prohibited whether it takes place within The Company premises, client premises or outside, including at social events, business trips, training sessions or conferences sponsored by UniTrust.

4. The Procedure

4.1 Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. The Company recognises that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

4.2 Wherever possible, the employee should speak to their manager or, if the complaint is about the employee's line manager, should contact the HR Team. It may be possible to discuss and agree a solution informally between the manager and employee. A record of this type of conversation should still be kept.

4.3 Where it is not possible to deal with a complaint informally or the matter is serious and/or the employee wishes to raise it formally, they should submit the grievance in writing to their line manager. If the complaint is about the line manager, the employee should submit their grievance to the HR Team.

4.4 The grievance should be a factual statement setting out the complaint including the name of the alleged perpetrator(s), the nature of the alleged harassment, the date(s) and time(s) at which

attempt to stop it from occurring.

4.5 Any complaint will be investigated in a timely, impartially and as far as possible in a confidential manner. Individuals not involved in the complaint or the investigation should not be told about the complaint. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. The investigation should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

4.6 An investigation meeting with the employee will be arranged, so that the employee can give an account of events. The employee may bring a colleague or trade union representative to the meeting. Ensure the employee knows that they can lodge a complaint outside of the company through the relevant country/legal framework.

4.7 Where a complaint is about an employee, consideration will be given to suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the alleged perpetrator. They have a right to be told the details of the allegations against them, so that they can respond appropriately.

4.8 Where the complaint is about a non-employee such as a customer or a contractor, the Company will consider what action may be appropriate to protect the person making the complaint and anyone else involved, pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, the Company will attempt to discuss

the matter with the third-party.

4.9 The Company will also seriously consider any request by the person making the complaint for changes to their own working arrangements during the investigation, such as changes to their duties or working hours so as to avoid or minimise contact with the alleged harasser.

4.10 It may be necessary to interview witnesses to any of the incidents mentioned in an employee's complaint. If so, the importance of confidentiality will be emphasised to them.

4.11 The outcome of the grievance will be recorded on the personnel file of the person making the complaint.

5 Action taken following the procedure

5.1 If the manager hearing the grievance considers that harassment has occurred, prompt action will be taken to address it. Where the harasser is an employee the matter will be dealt with under the Company's Disciplinary policy.

5.2 Where the alleged perpetrator is a third-party, appropriate action may include putting up signs specifying what is acceptable and unacceptable behaviour; speaking with them about their behaviour or, in very serious cases, banning them from the premises or terminating a contract with them.

5.3 Whether or not a complaint is upheld, the Company will consider how best to manage the ongoing working relationship between the person making the complaint and the alleged harasser which may include arranging mediation and/or counselling, or changing the duties, working location or reporting lines of one or both parties.

6 Appeals

6.1 Where an employee is not satisfied with the outcome they may appeal in writing by writing to the appeal manager listed in the outcome letter, stating their full grounds of appeal, within 5 working days of the date on which the decision is given.

6.2 An appeal meeting will be arranged and heard in line with the Appeals Procedure. The employee may bring a colleague or trade union representative to the appeal meeting.

6.3 The outcome of the appeal will be confirmed in writing and this will be the end of the procedure, with no further right of appeal.

7 Advice

Help and advice about this policy may be obtained from the HR Team:

Tel: 0208 903 8303

Email hr@unitrust.co.uk