

Payments Pro Ltd Sexual Harassment Prevention Policy

1. Introduction and Purpose

1.1 Commitment:

Payments Pro Ltd is committed to providing a work environment free from sexual harassment. We aim to create a respectful and safe workplace where all workers are treated with dignity. Sexual harassment is a form of unlawful discrimination under the Equality Act 2010.

1.2 Statutory Duty:

This policy is updated to comply with the legal duty introduced by the **Worker Protection (Amendment of Equality Act 2010) Act 2023**, which requires us to take **reasonable steps** to prevent sexual harassment of our employees in the course of their employment. This duty is proactive, meaning we must take steps to prevent harassment from occurring, not just respond to it after the event.

1.3 Scope:

This policy applies to all employees, workers (including contractors, agency workers, and temporary staff), volunteers, and interns. It covers conduct that occurs in the workplace, during work-related activities (e.g., training, business trips, social events), and conduct using work-provided communications or personal equipment where connected to work.

2. Definition of Sexual Harassment

Sexual harassment is defined under the Equality Act 2010 as **unwanted conduct of a sexual nature** which has the **purpose or effect** of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Examples of sexual harassment include, but are not limited to:

- **Verbal:** Sexual comments, jokes, slurs, or innuendos; unwelcome remarks about a person's appearance, body, or sex life; persistent requests for social or sexual encounters after refusal.
- **Non-Verbal:** Displaying sexually suggestive pictures, objects, or materials; leering, staring, or suggestive gestures; unwanted or inappropriate physical proximity.
- **Physical:** Unwanted touching, patting, pinching, brushing against someone, or hugging/kissing.
- **Digital/Online:** Sending or displaying sexually explicit or suggestive emails, texts, or social media messages; circulating or viewing pornography; online sexual gossip or rumours.

Crucially, the conduct does not need to be directed at a specific person or intended to harass; it only needs to have the 'effect' of creating a hostile environment for the person concerned.

3. Preventative Measures (Reasonable Steps)

To fulfil our new legal duty, Payments Pro Ltd will take the following **reasonable steps** to prevent sexual harassment:

3.1 Risk Assessment and Monitoring:

- We will conduct regular **sexual harassment risk assessments** to identify potential risks in the workplace, considering factors like working patterns, work environment, contact with third parties, and prior incidents.
- We will actively monitor the workplace culture, including through confidential staff surveys, one-to-one discussions, and exit interviews, to identify and address any warning signs.

3.2 Clear Policy and Communication:

- This policy will be clearly communicated to all workers upon induction and regularly re-issued.
- We will adopt a **zero-tolerance approach** to sexual harassment and make this clear to all employees and, where appropriate, to third parties.

3.3 Training and Awareness:

- **Mandatory Training:** All employees will receive regular, comprehensive, and effective training on this policy, what constitutes sexual harassment, their responsibilities, and the reporting process.
- **Manager/Leadership Training:** Managers and those responsible for addressing complaints will receive enhanced training on the preventative duty, risk assessment, and how to handle reports promptly and sensitively.

3.4 Preventing Third-Party Sexual Harassment: Although the legislation on employer liability for third-party harassment was removed, the preventative duty still requires us to take reasonable steps to prevent sexual harassment of our workers by third parties (e.g., customers, clients, visitors).

- **Measures will include** Displaying clear notices stating our zero-tolerance policy; communicating the policy to third parties where appropriate; implementing safety measures for high-risk roles (e.g., working in pairs, providing emergency contact or alarm systems); and taking prompt action against third parties who harass our workers, up to and including terminating contracts or service provision.

4. Responsibilities

4.1 All Workers:

- Treat all colleagues, third parties, and visitors with respect and dignity.
- Immediately stop any behaviour that may constitute sexual harassment when requested.
- Be familiar with and comply with this policy.
- Report any incident of sexual harassment they experience or witness, or any situation where they feel at risk, using the procedure in section 5.

4.2 Managers and Supervisors:

- Act as role models by upholding professional standards.
- Implement and enforce this policy within their teams.
- Take immediate and appropriate action upon becoming aware of any potential sexual harassment.

- Ensure their teams receive and understand the training.
- Protect complainants from retaliation and support them throughout the process.

4.3 Senior Management/HR:

- Ensure that adequate resources are available to implement and monitor this policy.
- Appoint designated contacts for reporting and conducting investigations.
- Ensure all reasonable preventative steps are identified, implemented, and regularly reviewed.

5. Reporting and Investigation Procedure

5.1 Reporting an Incident:

- A worker who feels they have been sexually harassed, or has witnessed such conduct, should report it promptly.
- Reports can be made to:
 - Their Line Manager/Supervisor (unless they are the alleged harasser).
 - [Designated Contact Person/HR/Senior Manager].
 - [Confidential Reporting Channel, e.g., a dedicated email address or external service].
- Reports can be made formally (in writing) or informally (verbally). We encourage formal reporting for detailed record-keeping.
- The worker raising a concern will be protected from victimisation, provided the complaint is made in good faith (i.e., not maliciously).

5.2 Confidentiality and Support:

- All reports will be treated with the utmost seriousness and confidentiality. Information will only be disclosed on a "need-to-know" basis to facilitate the investigation and resolution.
- Support services, such as confidential counselling, will be offered to all individuals affected by the incident.
- Appropriate interim measures (e.g., temporary changes to working arrangements) will be considered to ensure the safety and wellbeing of the complainant during the investigation.

5.3 Investigation Process:

- Upon receipt of a complaint, a fair, prompt, and impartial investigation will be conducted by an appropriate, trained individual who has had no prior involvement with the matter.
- The investigation will include interviewing the complainant, the alleged harasser, and any witnesses, and reviewing relevant evidence.
- The findings will be communicated to all parties involved.

6. Disciplinary Action and Compensation Uplift

- If an investigation concludes that sexual harassment has occurred, the perpetrator will be subject to the company's Disciplinary Procedure, which may result in a formal warning, suspension, or **termination of employment (gross misconduct)**.
- If a claim for sexual harassment against the company is upheld at an Employment Tribunal, and the Tribunal finds that the company failed to take **reasonable steps** to prevent the

harassment (a breach of the new duty), the Tribunal may award an **uplift in compensation of up to 25%**.

7. Review

This policy will be reviewed annually or following any changes to legislation or guidance (e.g., from the EHRC or Acas).

Date of Policy: 22nd July 2025

Next Review Date: 22nd July 2026