

	<p align="center">MORTIMER COMMUNITY BENEFIT SOCIETY LIMITED (MCBS)</p>
	<p align="center">SEXUAL HARASSMENT POLICY (to be reviewed and updated annually)</p>

Definition of Sexual Harassment

Sexual harassment is any unwanted behaviour of a sexual nature that makes someone feel offended, humiliated, or intimidated. It can include, but is not limited to:

- Unwelcome sexual advances.
- Inappropriate touching or physical contact.
- Sexual jokes or comments.
- Displaying sexually explicit materials.
- Sending sexually explicit emails or messages.

Duty to Prevent Sexual Harassment

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, effective from 26 October 2024, MCBS has a duty to take reasonable steps to prevent sexual harassment in the workplace. This includes:

- Implementing preventive measures such as regular training and clear communication of this policy.
- Creating a culture of respect and inclusion.
- Taking proactive steps to identify and mitigate risks of sexual harassment.

Reporting Procedure

If staff or volunteers experience or witness sexual harassment, it should report it to the Bar Manager in the first instance. If you do not feel able to do so, report it to the Chair of MCBS or another member of the Committee. Reports can be made in person or via email.

Handling Sexual Harassment Complaints

All complaints will be taken seriously and handled promptly and sensitively. If proven, we will take prompt and effective action. Any employee found to have engaged in sexual harassment may face disciplinary action, which may include dismissal. Volunteers may also be subject to appropriate actions.

Please see also the MCBS Disputes & Complaints Policy.

PROCEDURE

This will include:

- Acknowledging receipt of the complaint
- Conducting a thorough and impartial investigation
- Keeping all parties informed of the progress
- Ensuring confidentiality as much as possible

Subject to the outcome of an investigation, MCBS may consider a range of formal and, potentially, informal options where both the MCBS and the person making a complaint think this is appropriate.

Informal Action.

This might include:

- Explaining to the person who's been complained about why their behaviour was not acceptable and that it needs to change.
- Arranging mediation between the people involved.

Formal Action.

A formal procedure will be followed either:

- When informal options have not or would not work or be appropriate or.
- A formal complaint is made at the outset.

Disclosure of Sensitive Communications

MCBS will handle sensitive communications with the utmost care. This includes:

- Maintaining the confidentiality of all parties involved
- Ensuring that any sensitive information disclosed during the investigation is protected
- Following legal guidelines on privilege and disclosure to ensure that sensitive communications are only shared with those who need to know.

Supporting People in Speaking Up About Sexual Harassment

MCBS recognises the importance of supporting individuals in speaking up about sexual harassment. MCBS also recognises that creating and maintaining an open, respectful culture is key to doing so and, to foster a safe environment for reporting.

MCBS will:

- **Reduce Psychological Barriers:** Acknowledge the difficulty of speaking up and provide reassurance that reports will be taken seriously and handled with sensitivity.
- **Lessen Social Threats:** Make it clear that the intention of reporting is to improve the workplace environment, not to target individuals.
- **Provide Clear Reporting Channels:** Ensure that people know how and where to report incidents, and that they can do so without fear of retaliation.
- **Offer Support and Resources:** Provide access to counselling and support services for those who report harassment.
- **Encourage a Speak-Up Culture:** Regularly communicate the importance of speaking up and, if reasonably possible, provide training on how to do so effectively.

Additional Steps for Management

MCBS also recognises that creating an open and respectful culture is primarily the responsibility of the Committee. To further ensure a harassment-free workplace, the Committee will:

- **Include Policies and Training:** Ensure that our zero tolerance of sexual harassment is properly reflected in other policies, induction and on the job training.
- **Lead by Example:** Demonstrate zero tolerance for sexual harassment through their own behaviour and actions.
- **Communicate Clearly:** Communicate the importance of a harassment-free workplace and the steps being taken to ensure it.
- **Report Instances:** Any complaints about sexual harassment will be reported to the chair and, if appropriate, other reporting action taken, such as to the Committee.

Support for Affected Individuals

MCBS will provide support to anyone affected by sexual harassment, including access to counselling services and adjustments to work arrangements if needed.

UK Sexual Harassment Resources

Equality and Human Rights – [Workplace Sexual Harassment Guidance](#).

Harvard Business Review – [How to speak up when it matters](#).

Acas: [Sexual harassment](#).

Charity Commission E&W – [serious incident reporting](#).

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