




# Sexual Harassment

## RA032-CEN

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<b>Approved for Use</b>	07/08/2025	

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Version	Date	Name	Details
1	05/08/2025	Steve Usher	New draft
2	22/08/2025	Steve Usher	Changed at risk – Especially Women/all staff to “all employees”

**Note** Under no circumstances is this document to be modified in any way without the QHSE Managers consent. Uncontrolled when Printed or Downloaded

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## 1 Document Summary

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- 1.1 This risk assessment identifies and evaluates the potential risks of sexual harassment within the workplace. It outlines the hazards, those at risk, the consequences of harm, and the control measures implemented to prevent incidents and ensure a safe, respectful, and inclusive working environment. It also forms part of the organisation's commitment to comply with the Equality Act 2010 (as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023).
- 1.2 The document demonstrates the reasonable steps taken by the employer to prevent sexual harassment, including awareness, training, reporting processes, leadership responsibilities, and culture monitoring.

**Note** Any deviation from this RA or any linked documents mentioned below, must be agreed with the QHSE Manager.

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## 2 Definition of Sexual Harassment

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- 2.1 Sexual harassment is unwanted behaviour of a sexual nature that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment for them

It can be a one-off incident or a pattern of behaviour, and the key factor is that the conduct is unwelcome and makes the person feel uncomfortable, distressed, or threatened—regardless of the intention behind it.

- 2.2 Sexual harassment may involve:

Examples include (but are not limited to):

- Verbal: Sexual comments, jokes, or suggestive remarks
- Non-verbal: Leering, staring, gestures, displaying sexually explicit images
- Physical: Unwanted touching, hugging, brushing against someone
- Written/Online: Inappropriate emails, texts, social media messages, or images
- Coercion: Pressure for sexual favours or dates, threats linked to career progression

- 2.3 Important Notes:

- It does not have to be directed at a specific person—for example, sexual jokes in a group setting can still create a hostile environment.
- The recipient decides what is acceptable to them—not the person delivering the behaviour.
- It can occur between colleagues, between a manager and employee, from third parties (e.g., clients, contractors, the public), or online.
- Sexual harassment can affect anyone, regardless of gender, sexuality, or role.

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## 3 Responsibilities

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### 3.1 Managing Director

- Ensure company-wide zero-tolerance approach is implemented
- Provide resources to support harassment prevention and reporting
- Set the tone and lead by example

### 3.2 HR Manager

- Maintain and communicate the Bullying & Harassment Policy
- Ensure confidential, fair, and timely response to reports
- Coordinate training and cultural reviews

### 3.3 Line Managers / Supervisors

- Promote respectful behaviours on site and in offices
- Attend and implement training
- Act immediately on any signs or reports of inappropriate behaviour

### 3.4 QHSE Manager / Coordinators

- Promote a proactive reporting culture
- Assist with investigations where appropriate

### 3.5 All Employees

- - Comply with the Code of Conduct
- - Report concerns or incidents
- - Support a respectful, inclusive culture.

## 4 Training & Competence

4.1 To ensure employees understand, identify, and prevent sexual harassment:

Training Type	Personnel	Frequency	Content
Induction training	All new staff	On joining Company	Company Values, Harassment Policy, Reporting routes
Annual Refresher	All Staff	Annually	Behaviour expectations, real-life examples, impact awareness
Line Manager Training	Supervisors	Every 3 years	Investigating reports, maintaining confidentiality, non-retaliation
TBT's	Site-based operatives	Annual	Respectful communication, boundaries, how to report

## 5 Reporting

5.1 The company is committed to providing clear, confidential, and accessible reporting channels to deal with allegations of sexual harassment effectively.

5.2 How to Report

- **Informal Report (Optional):**

Speak directly to a trusted supervisor or HR contact if you feel comfortable doing so.

- **Formal Report:**  
 Submit a complaint through:
  - o Direct conversation with HR or a Manager
  - o Written complaint (email or form)
  - o Anonymous reporting system (if available)
  
- **Whistleblowing:**  
 For serious or unresolved issues, use the company’s protected disclosure procedure.

### 5.3 Key Commitments:

- All reports are taken seriously and investigated promptly.
- Confidentiality is maintained at all times.
- No victimisation or retaliation is tolerated.
- Support is available through HR

## 6 Linked Documents

Document Name	Location
<b>PY004-CEN Grievance Policy</b>	Documents/QHSE/Policies/Policies
<b>PY005-CEN Disciplinary Policy</b>	Documents/QHSE/Policies/Policies
<b>PY019-CEN Data Protection Policy</b>	Documents/QHSE/Policies/Policies
<b>PY055-CEN Bullying &amp; Harassment Policy</b>	Documents/QHSE/Policies/Policies

## 7 Risk Assessments

- 7.1 The following risk assessments are based on sexual harassment in the workplace; the following operational hazards and risks provide a general indication of what may be encountered during normal operations:
- Unwanted sexual comments, jokes, gestures
  - Inappropriate touching, physical contact
  - Abuse of power or coercion
  - Online or digital harassment (emails, texts, social media)
  - Lack of awareness, reporting reluctance, or fear of retaliation
  - Harassment occurring in workplace
  - Incidents not reported or handled poorly
  - Digital or online harassment
  - Culture that tolerates inappropriate behaviour
- 7.2 The list is not exhaustive and operational personnel **MUST** carry out an on-site dynamic risk assessment.

## 7.3 Risk Scoring Methodology & Risk Assessment

Action Required						
<b>Minor (MI)</b>	1	Negligible concern – no action usually needed				
<b>Low (L)</b>	2-4	Manageable risk – monitor or manage				
<b>Moderate (MO)</b>	5-9	Needs control measures – actively manage				
<b>Major (MA)</b>	10-15	Significant risk – strong controls required				
<b>Catastrophic (C)</b>	16-25	Unacceptable – stop work until risk is reduced				
Examples of Persons at Risk						
Inexperienced (I)						
Office Staff						
Visitors						
TM Operative (TMO)						
Site Personnel (SP)						
All						
Severity Level	Minor 1	Low 2	Moderate 3	Major 4	Catastrophic 5	
	1	2	3	4	5	
Likelihood of the hazard happening	Almost Certain – Expected frequently (Monthly or more often) 5	5	10	15	20	25
	Likely – Will probably occur (A few times a Year) 4	4	8	12	16	20
	Possible – May occur sometimes (Once a Year) 3	3	6	9	12	15
	Unlikely – Could happen occasionally (1 every 1-5 Yrs) 2	2	4	6	8	10
	Rare – Highly unlikely to occur (1 very 5+ Yrs) 1	1	2	3	4	5

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Hazard(s)	At Risk	Risks	PRE-RCM				Risk Control Measures	POST-RCM			
			Risk score ( S x L)					Likelihood	Severity	Risk Score	Risk Level
			Likelihood	Severity	Risk Score	Risk Level					
Unwanted sexual comments, jokes, gestures	All employees	Psychological harm, stress, anxiety, fear, loss of dignity, absenteeism, resignation	2	3	6	MO	<ul style="list-style-type: none"> <li>a. Zero-tolerance Bullying &amp; Harassment Policy in place</li> <li>b. Clear definition of sexual harassment(within this RA)</li> <li>c. Posters and awareness in offices and depots (QHSE Dept)</li> <li>d. Annual policy refresher (HR)</li> <li>e. Annual mandatory toolbox talks for all personnel (HR)</li> </ul>	1	3	3	L
Inappropriate touching, physical contact	All employees	Trauma, breach of personal boundaries, legal action	2	3	6	MO	<ul style="list-style-type: none"> <li>a. Anonymous reporting mechanisms (HR)</li> <li>b. Designated trained harassment contact(s) (HR)</li> <li>c. Whistleblowing policy (HR)</li> <li>d. Grievance procedure with protective measures (HR)</li> </ul>	1	3	3	L
Abuse of power or coercion	Subordinates	Threat to job security, pressure to comply, emotional distress	2	3	6	MO	<ul style="list-style-type: none"> <li>a. Code of conduct (MD)</li> <li>b. Disciplinary procedures (HR)</li> <li>c. Line manager conduct monitored via HR and performance review (Department Heads)</li> </ul>	1	3	3	L
Online or digital harassment (emails, texts, social media)	All employees	Intrusion, humiliation, ongoing distress outside of work	2	3	6	MO	<ul style="list-style-type: none"> <li>a. Cyber-bullying awareness – PY055-Bullying &amp; Harassment Policy in place.</li> </ul>	1	3	3	L
Lack of awareness, reporting reluctance, or fear of retaliation	All employees	Silence around harassment allows issues to persist, repeat offences occur	2	3	6	MO	<ul style="list-style-type: none"> <li>a. Behavioural expectations in inductions (HR)</li> <li>b. Regular toolbox talks on respect and inclusion (HR)</li> <li>c. Team leader responsibilities clarified (within this RA)</li> </ul>	1	3	3	L