

Sexual Harassment Policy

1. Introduction

- 1.1. 2 Start is committed to providing a safe environment for all its students free from discrimination on any ground and from harassment, including sexual harassment.
- 1.2. We will operate a zero-tolerance policy for any form of sexual harassment and treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will forfeit their course and be asked to leave the premises immediately.
- 1.3. Third-party sexual harassment of our workforce is unlawful and will not be tolerated. The law requires employers to take steps to prevent sexual harassment by third parties and we are committed to doing so.
- 1.4. We will not tolerate sexual harassment by any member of our workforce against a third party. Instances of sexual harassment of this kind may lead to disciplinary action, including termination of employment.

2. Definition of sexual harassment

- 2.1. Sexual harassment does not need to occur in person. It can occur via digital means, including social media sites or channels (e.g. WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour. Examples of sexual harassment include, but are not limited to:
 - 2.1.1. sexual comments or jokes, which may be referred to as “banter”
 - 2.1.2. displaying sexually graphic pictures, posters or photos
 - 2.1.3. suggestive looks, staring or leering
 - 2.1.4. propositions and sexual advances
 - 2.1.5. making promises in return for sexual favours
 - 2.1.6. sexual gestures
 - 2.1.7. intrusive questions about a person’s private or sex life or a person discussing their own sex life
 - 2.1.8. sexual posts or contact in online communications, including on social media
 - 2.1.9. spreading sexual rumours about a person
 - 2.1.10. sending sexually explicit emails, text messages or messages via other social media
 - 2.1.11. unwelcome touching, hugging, massaging or kissing

2.1.12. unnecessary close contact e.g. leaning over someone

2.2. Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do, an act which is protected under discrimination and harassment laws. These are outlined below. It is not necessary for the person to have done the protected act in order for detrimental treatment to be considered as victimisation. The protected acts are:

2.2.1. making a claim or complaint under the Equality Act (eg for discrimination or harassment)

2.2.2. helping someone else to make a claim by giving evidence or information in connection with proceedings under the Equality Act

2.2.3. making an allegation that someone has breached the Equality Act

2.2.4. doing anything else in connection with the Equality Act.

3. *Circumstances which are covered*

3.1. This policy covers behaviour which occurs in the following situations:

3.1.1. All 2 Start Training Locations (for training conducted at your place of work, please refer to your company policy)

3.1.2. a situation occurring outside of the normal training locations or normal training hours which is related to training, eg phone call or message

3.1.3. outside of a training situation but involving a member of 2 Start staff connected to the Organisation, including on social media

4. *Reporting procedure*

4.1. We are committed to ensuring that there is no sexual harassment or victimisation at our Company. Allegations of sexual harassment and victimisation will be addressed straight away, any immediate action taken to safeguard individuals, investigated and appropriate action taken including escorting students offsite if they have been found to have committed the act of harassment, including sexual harassment or victimisation. In the event that a 2 Start member of staff has been accused, investigated and found to be guilty, the necessary disciplinary action will be enforced.

5. *Formal complaint*

5.1. If you experience sexual harassment and you feel comfortable to do so, you should contact the depot manager who may be able to resolve the matter. If you feel unable to do this verbally then you should submit a written complaint to Caroline Moon (Director) at caroline@2start-training.com who will begin any necessary investigation into the matter.

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

5.2.1. the name of the alleged harasser

- 5.2.2. the nature of the alleged harassment
 - 5.2.3. the dates and times when the alleged harassment occurred
 - 5.2.4. the names of any witnesses
 - 5.2.5. any action already taken by you to stop the alleged harassment.
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- 5.3. Immediate action regarding stopping a course or changing instructors may be implemented whilst the investigation is being completed.
 - 5.4. At the conclusion of the investigation, which will normally be within 14 working days of the complaint being raised, the decision of the investigator, detailing the findings, will be sent in writing to you.

Name: Caroline Moon
Position: Finance Director

Date: 5/11/24

Signed:



Date of next review: By 5/11/25