City of London Corporation Delegated Authority Report

Committee(s): Corporate Services Committee	**Dated:** 9 September 2026
Subject: Preventing Sexual Harassment Policy Proposal	**Public report:** For Decision.
This Proposal: • My Wellbeing & Belonging – employees should have sufficient support & resources to undertake their work. • Trustworthy Leadership – Leaders and managers hold responsibility for creating a safe physical and psychological working environment.	Delivers People Strategy 2024-2029 outcomes.
Does this Proposal require extra revenue and/or capital spending?	No.
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Cliff Morton - Chief People Officer.
Report author:	Maggie Heneghan – Senior Policy Officer and Industrial Relations.

Summary

The **Employment Rights Act 2025** will:

- Strengthen the duty on employers to take 'reasonable steps' to prevent sexual harassment of their employees by increasing the duty to take 'all reasonable steps'.
- Introduces employer liability for third-party harassment. This liability is not just limited to sexual harassment, but extends to harassment on the grounds of age, disability, religion or belief, sex and sexual orientation.

These changes are due to come into force on **30 October 2026**.

As part of our duty to take 'all reasonable steps' to prevent sexual harassment, we propose the implementation of a dedicated Preventing Sexual Harassment Policy with effect from **1 October 2026**.

The policy has been developed following consultation with relevant stakeholders, including recognised Trade Unions, Senior Employee Representatives, HR colleagues and the Equality, Equity, Diversity and Inclusion team.

The report is provided for information under delegated authority arrangements approved by the Corporate Services Committee on 27 November 2024.

Recommendation(s)

It is recommended that Members approve the implementation of the Preventing Sexual Harassment Policy.

Main Report

Background

The Employment Rights Act 2025 will increase employers' duty to take all reasonable steps to prevent sexual harassment.[1] The Act also extends to prevent sexual harassment by third parties.[2] The change is effective from 30 October 2026.

Current Position

Our sexual harassment procedure currently makes up part of our Bullying, Harassment and Sexual Harassment Policy.

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[1] Employment Rights Act 2025, last accessed 18 August 2026.

[2] Ibid.

The current procedure is primarily focused on responding to incidents after they have occurred. While it provides routes for raising complaints and conducting investigations, it does not contain the preventative controls, training expectations, management guidance or risk assessment arrangements necessary to help demonstrate compliance with the duty to take all reasonable steps to prevent sexual harassment.

It does **not** include:

- Any definitions or explanation of what may constitute sexual harassment, victimisation or bullying.
- Explain third-party Sexual Harassment.
- Provide information for line managers on how to help resolve an informal concern.
- Advise when to progress to the formal procedure.
- Expand on the meaning of a vexatious or malicious grievance and the consequences for raising such a grievance.
- Align the policy with the Grievance procedure.

Preventing Sexual Harassment change

ACAS recommends that employers consider having a specific policy on sexual harassment, training everyone on how to recognise sexual harassment, training managers on their responsibilities and take steps to creating the right culture.[3]

The dedicated Preventing Sexual Harassment Policy and accompanying Employee Guide, Manager Guide and Manager Risk Assessment would help us toward our duty. We are also working with the Learning & Organisational Development Team on mandatory training for all staff, with information on manager responsibilities for manager training.

Why are we suggesting change now?

In preparation for the implementation of the Employment Rights Act 2025, the City Corporation is aiming to implement the updated policy from 1 October 2026. The legislation update is due to be in effect from 30 October 2026, so this would ensure we have a policy in place ahead of this date.

Consultation summary

The policy was developed in consultation with:

- HR.
- Employee Relations.

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[3] Preventing sexual harassment - Sexual harassment - Acas, last accessed 18 August 2026.

- EEDI.
- City of London Police.
- City Bridge Foundation
- Trade Unions GMB and Unite.
- Senior Employee Representatives.

Feedback received through consultation has informed the final draft policy. Consultation included an HR Working Group session, an Equality Impact Assessment, engagement with recognised Trade Unions and engagement with Senior Employee Representatives.

Key policy changes.

The policy includes:

- Explicit reference to our duty as an employer.
- Focuses on preventing rather than reacting.
- Stronger third-party harassment provisions.
- Greater emphasis on manager's role in taking preventative action.
- Better reporting framework.
- Better victim support protection.
- Inclusion of risk assessment as a formal control.

It is a more structured, supportive and procedurally robust process than the previous policy.

Options

1. Two options have been provided:
   a. Adopt the new policy.

      This option supports organisational readiness for the Employment Rights Act 2025 and provides a clearer framework for our commitment to Preventing Sexual Harassment.

   b. Maintain the current policy.

      While we could opt to "do nothing", this would increase the risk of us failing to meet our employer duty to take all reasonable steps to prevent sexual harassment.

Corporate & Strategic Implications

- My Wellbeing & Belonging – employees should have sufficient support & resources to undertake their work.

Trustworthy Leadership – Leaders and managers hold responsibility for creating a safe physical and psychological working environment.

Strategic implications – this proposal supports the People Strategy by promoting the My Wellbeing and My Belonging limb, helping to ensure employees have sufficient support & resources to undertake their work. It also helps towards our Trustworthy Leadership, helping managers to take responsibility for creating a safe working place and addressing concerns early on.

Legal implications – The revised policy applies to all workers. The policy has been subject to review by recognised Trade Unions and Senior Employee Representatives.

Risk implications – Failure to adopt the revised policy would increase the risk of the organisation failing to take all reasonable steps in line with the Employment Rights Act 2025.

Equalities implications – An Equality Impact Assessment Form has been completed and will be kept updated. The EEDI team and trade unions have provided feedback which we are implementing.

Conclusion

It is proposed that the dedicated Preventing Sexual Harassment Policy be adopted.

Appendices

- Appendix 1 – Proposed Preventing Sexual Harassment Policy
- Appendix 2 – Current Bullying, Harassment & Sexual Harassment Policy

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