Employee Handbook

CITY OF LONDON

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Preventing Sexual Harassment Policy

Content Warning: This Policy relates to Sexual Harassment and may be triggering for some people to read. If you would prefer to discuss this policy or need support, please contact your HR Business Partner (see their intranet page at HR Business Partnering for more information).

Employee Handbook

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Introduction

1. The City of London Corporation is committed to creating and maintaining an inclusive, respectful and discrimination-free working environment for all staff. All concerns related to sexual harassment are treated seriously and addressed appropriately, in line with the City Corporation's commitment to dignity, fairness and respect at work.

2. Employees are expected to uphold high standards of conduct by acting in accordance with the Code of Conduct and by demonstrating behaviours that maintain trust and confidence between colleagues, the City Corporation and the public.

3. The City Corporation recognises that there may be times when an employee experiences inappropriate behaviour in the workplace. Staff are encouraged to report such incidents in line with this policy, so that concerns can be addressed and appropriate steps taken to protect individuals and prevent recurrence.

4. The Employment Rights Act 2025 introduces a duty to take **all reasonable steps** to prevent sexual harassment. In support of this duty, the City Corporation encourages staff to raise concerns at the earliest opportunity to enable issues to be addressed promptly and support the safety and dignity of all staff at work.

5. This policy, together with accompanying documents (see the **Toolkit** heading below), sets out a clear and structured approach for preventing and resolving sexual harassment concerns. It explains both informal and formal procedures, supports staff in challenging unwanted sexual behaviour and outlines the support available where a sexual harassment concern or grievance has been raised. The policy applies both to employees who feel they have experiences sexual harassment and to those to whom an allegation relates.

6. The policy is aligned with Preventing sexual harassment - Sexual harassment - Acas guidance.

Scope

7. This policy applies to all City Corporation staff excluding teaching staff in City Corporation Schools who have their own respective sexual harassment policies.

8. This policy sets out the procedure for addressing cases of sexual harassment at the City Corporation. This is inclusive of sexual harassment by consultants, contractors and agency workers and/or third parties such as customers, suppliers or visitors to our premises.

9. The policy applies to conduct:

- In the workplace;
- At work-related events;
- During work-related travel;
- Online or through digital communication; and
- In any other circumstances where an individual is working, representing us or otherwise connected to work.

Dignity at work

10. The City Corporation is committed to fostering a positive workplace culture that values equity, diversity and inclusion. Treating others with dignity and respect is fundamental to maintaining a healthy, safe and supportive working environment and to preventing and addressing unacceptable behaviour.

11. We are committed to taking proactive measures to encouraging a positive work culture and to prevent sexual harassment of our workers by:

- Providing mandatory training on Preventing Bullying, Harassment & Sexual Harassment on an annual basis.
- Providing additional training for line managers to ensure they understand their responsibility in preventing and addressing sexual harassment in the workplace, including by third parties.
- Encourage managers to undertake regular risk assessments to determine all reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace, including by third parties;

- Encouraging individuals to treat others with respect as part of this policy.

12. Risk assessments should be reviewed periodically and following any incident, complaint, workplace change or identified risk.

13. This policy forms part of the City Corporation's ongoing commitment to promoting dignity at work and ensuring that all staff are able to carry out their roles in an environment free from harassment and inappropriate conduct.

Definitions: What is Sexual Harassment?

Sexual harassment

14. The Equality Act 2010 defines sexual harassment as unwanted conduct of a sexual nature. It has the purpose or effect of violating the dignity of a worker or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

15. Examples of sexual harassment include, but is not limited to:

- Criminal behaviour, including sexual assault, stalking, indecent exposure and offensive communications such as cyberflashing. For further clarification on what constitutes a crime, please see Appendix 1 below.
- Sexual remarks about someone's body, clothing, or appearance.
- Sexual comments or jokes.
- Displaying sexually graphic pictures, posters or photos.
- Suggestive looks, staring or leering.
- Propositions and sexual advances.
- Making promises in return for sexual favours.
- Sexual gestures.
- Intrusive questions about a person's private or sex life or discussing your own sex life.
- Sexual posts or contact on social media.

- Spreading sexual rumours about a person.
- Sending sexually explicit emails or text messages.
- Unwelcome touching, hugging, massaging or kissing.

16. It is important to note that if a person does not object to inappropriate behaviour at the time, it should not be assumed that they are giving their consent. Consent exists where clear and unambiguous consent has been freely given and continues to be given.

17. Sexual harassment in the workplace does not only relate to your primary physical work location (including when working from home). It extends (but is not limited) to a social event relating to work, work meetings, training and travelling for work. It can also happen in person or online e.g., in meetings, email, social media or via messaging platforms (for more information, please refer to the Social Media Policy).

18. In considering whether behaviour may amount to sexual harassment, the following points should be noted:

- Sexual harassment can be a one-off incident or a repeated pattern of behaviour.
- Anyone can be a victim of sexual harassment regardless of their sex, sexual orientation or gender identity (or that of the alleged harasser), and sexual harassment may occur between people of the same sex.
- Sexual harassment can come also from anyone you encounter through your work, including a co-worker, a manager, somebody in a position of authority, a customer, client or member of the public.
- A person can be affected by sexual harassment even if the conduct is not targeted at them.
- Something can still be considered sexual harassment even if the employee accused did not mean for it to be.
- A written warning; to

- Dismissal without notice for cases of potential gross misconduct (outlined in the Disciplinary Policy).

19. Aggravating factors, such as abuse of power over a more junior colleague, will be considered in determining the result of a disciplinary action.

20. Sexual harassment includes a wide range of behaviours with the most extreme form of sexual assault being a serious crime. The City Corporation will support employees who wish to press charges against offenders.

Victimisation

21. Victimisation is when an employee is treated less favourably for making a sexual harassment grievance. A worker will not be subject to a detriment (such as being denied a promotion, bullied, ostracised, given a poor reference etc.) for making a sexual harassment grievance.

Whistleblowing

22. Whistleblowing is when a worker raises a concern about wrongdoing in the public interest. A worker who blows the whistle has the right not to suffer detriment and (if they are an employee) not to be unfairly dismissed as a result of the disclosure. To be protected, a worker must reasonably believe that the disclosure is:

    - Listed in the Employment Rights Act 1996.[1] From 6 April 2026, sexual harassment has been added to this list.

    - The disclosure is in the public interest.

23. An anonymous disclosure route is available for staff who do not feel able to raise concerns openly. However, staff are encouraged to raise concerns on a non-anonymous basis where they feel able to do so, as anonymity may limit the City Corporation's ability to respond appropriately, including providing direct support, conducting a full investigation, and taking action to prevent recurrence.

24. Please see the Speak Up Policy for more information on whistleblowing.

[1] Employment Rights Act 1996, last accessed May 2026.

Reporting routes for victims and witnesses

25. If an employee feels that they are at risk of experiencing sexual harassment or have experienced sexual harassment, they may report the incident in line with Grievance Policy or Speak Up Policy. The Speak Up Policy is for whistleblowing and anonymous disclosures, but please be aware that our actions may be more limited where an anonymous disclosure is made.

26. There may be circumstances, due to the seriousness of the matter (e.g., the incident amounts to a criminal offense), where the City Corporation must take action to ensure the safety of the worker concerned or where other staff members are at risk. In these circumstances, appropriate safeguard measures will be put in place to prevent further harassment, or victimisation of the worker concerned.

Informal procedure

27. In line with the Grievance Policy, in the case of an informal disclosure, employees have the opportunity to raise concerns with their Line Manager. While there are no time limits for raising concerns about sexual harassment, doing so promptly helps the City Corporation to respond effectively and to ensure that appropriate protective measures can be put in place.

28. Line Managers should meet with the employee within five working days and provide an outcome in writing to the employee concerned as soon as possible. Line Managers are expected to approach such disclosures with sensitivity and support, listening carefully to the employee's concerns. The Line Manager should continue to meet with the employee periodically to verify if concerns have been addressed, and if not, take appropriate action to alleviate concerns.

29. If a Line Manager feels unable to deal with a concern, they should consider:

    - Contacting the Learning & Organisational Development team for additional support via email at trainingbookings@cityoflondon.gov.uk or via their intranet page at L&OD homepage.

    - Reaching out to Human Resources for additional support (see the intranet page at City of London - Corporate HR and Business Services).

30. Please see the Manager Guide and Employee Guide for more advice on appropriate responses when an employee makes a sexual harassment disclosure.

31. Where the sexual harassment disclosure reveals that the conduct at issue:

    - Has been ongoing and persistent.
    - Affects several people.
    - Where a third party is concerned.

    You should consider proceeding directly to the formal procedure (see the heading **Formal Procedure** below).

32. Where the concern relates to the Line Manager, the employee may approach an alternative or more senior manager.

Formal procedure

33. To make a formal grievance, the Sexual Harassment Reporting Form (see Appendix 1) should be completed by the person raising the sexual harassment grievance.

34. Please detail as much information as you can regarding the experience/ witnessed event (including what, how, when and where it happened, and who else may have witnessed it). We recognise that this can be difficult, so if you need support, please let your Line Manager or HR know (via the HR service desk) and alternative arrangements can be made.

35. Once the Sexual Harassment Reporting Form is completed, it should be given to either your Line Manager or Senior Manager. If neither are suitable or available, the form should be sent to your HR Advisor (HRAdvisors@cityoflondon.gov.uk).

36. A formal hearing will usually take place. The hearing will be conducted by a Grievance Hearing Officer who is independent of the issues raised, suitably

trained, experienced and of the appropriate level of seniority[2] (in line with the Managing People Policy). The Grievance Hearing Officer will be an independent party to help avoid any biases and will be supported by a Human Resources' representative where necessary.

37. The Grievance Hearing Officer should send a letter to the employee who submitted the grievance outlining:

- Their concerns.
- The procedure being followed.
- Potential outcomes.
- The employee's right to be accompanied. See Appendix 3 below for more detail.

38. Please see the Grievance Policy for more information on the hearing, including non-attendance and hearing outcomes.

39. If the decision results in the sexual harassment grievance being upheld, the person complained of may be liable to disciplinary action in accordance with our Disciplinary Policy.

40. In a small minority of cases, a vexatious or malicious grievance may be raised. Please note that a grievance will not be labelled 'vexatious' or 'malicious' unless there is clear evidence to support that conclusion. The meaning of 'vexatious' and 'malicious' is set out below:

[2] In line with the Managing People Policy, for employees up to and including Grade H, Management Levels 1, 2 and 3 can authorise progression to the formal procedure i.e., Town Clerk & Chief Executive, Deputy Town Clerk, Chief Operating Officer, Chamberlain & Chief Financial Officer, Comptroller & City Solicitor, Remembrancer, City Surveyor, Executive Director Innovation & Growth, Executive Director Environment, Executive Director Community & Children's Services, Commissioner for City of London Police, Head of City of London School, Head of City of London School for Girls, Head of City of London Freemen's School, Chief Executive Officer of the Barbican Centre, Principal of the Guildhall School of Music & Drama, Managing Director of Bridge House Estates & Chief Charities Officer. In addition, the Executive Director and Chief People Officer shall be treated as within Level 1 for this policy. Level 2 includes: Any other Senior Managers at Senior Manager Grade (SMG) Chief Officers, Heads of Service or equivalent and Senior Managers at grade I and J with responsibility for staff and associated budgets. Level 3 includes: Managers at Grade E,F,G and H.
For employees Grade I & J, Levels 1 and 2 can authorise progression to the formal procedure.

- A vexatious grievance is one which is pursued unreasonably and regardless of its merits, and which may seek to harass, burden or disrupt organisational processes.
- A malicious grievance is a concern raised in bad faith, for example where allegations are knowingly false or intended to cause harm to an individual or the organisation.

41. See the Grievance Policy for more information.

Right of Appeal

42. In line with the Grievance Policy, employees should submit their appeal within five working days of receiving the written decision. If pursuing an appeal, an employee must complete and send the Appeal Form (see Appendix 2 of the Grievance Policy) to Employee Relations at the following email address: employeremployeerelationsappeals@cityoflondon.gov.uk.

43. An appeal cannot be used simply because the employee disagrees with the outcome; it must be based on specific grounds, such as:

- A procedural irregularity.
- New evidence becoming available.
- Concerns that relevant information was not considered.

44. The Right of Appeal is available only to current employees, or to former employees who have exercised that right within six months of leaving employment with the City Corporation (for example, if an employee resigns on 1 January while a grievance they submitted is ongoing, they must submit any appeal by 1 July).

Third-Party Sexual Harassment

45. The City Corporation will provide all suppliers with this policy to ensure that expectations are clear, however we are aware that this may not prevent inappropriate behaviour by people who are not employed by the City Corporation.

46. If a visitor/ third-party commits a breach of this policy they will be asked to leave the premises and where they are representing another company, their behaviour will be reported to their employer. Additionally, the individual will be warned about the inappropriate nature of their behaviour and may be banned from the City Corporation premises. A Human Resources' representative must be informed if there are any allegations of sexual harassment by a third-party.

47. If there is an allegation of a City of London Corporation employee sexually harassing a third-party (e.g., a contractor or customer) in the workplace, this policy should be followed and disciplinary action may be taken.

When it's a crime

48. Where a Line Manager is informed by an employee that they have been sexually assaulted or raped in the workplace, the employee may wish to report the incident to the police. Employees are not required to report incidents of sexual assault or rape to the police, and no pressure must ever be placed on them to do so. The Line Manager must handle the conversation with sensitivity and understanding and provide appropriate support throughout the process.

49. It should be noted that, in certain circumstances, the City Corporation may be required to report the matter to ensure that appropriate protections are in place for the affected employee and for others who may be at risk. Line Managers should speak with Human Resources before discussing police reporting with the employee.

50. This may include situations where the manager or the employee reasonably believes that there is:

    - An ongoing risk to the safety of the employee or others; or
    - An increased risk to the employee's safety because they are a vulnerable person (for example, due to a mental health condition).

51. Where a Line Manager is unsure how to proceed, they should seek advice from their Human Resources Business Partner (see their intranet page at HR Business Partnering) and, where relevant, the Local Authority Designated Officer (see more information at Local Authority Designated Officer (LADO) - guidance for staff).

52. An internal investigation will not usually be delayed solely because a police investigation is underway. An internal investigation may also reach a different outcome to a criminal investigation (for example, where there is insufficient evidence to pursue a criminal prosecution but sufficient evidence to justify disciplinary action, including dismissal).

53. The Line Manager and/or their Human Resources Business Partner should liaise with the police to ensure that the internal process does not risk prejudicing any criminal investigation.

Support available

54. The investigation process will be a fair and thorough process with no presumption regarding the incident or outcome. All those involved in addressing sexual harassment grievances will have received appropriate training so that they can undertake their role sensitively and effectively.

55. At work, the person who raised the grievance should have a conversation with their Line Manager to review matters such as their current working arrangement and consider whether any additional support is needed, for example by using the Flexible Working or Special Leave and Time-Off Policy.

56. Any adjustments should be recorded and reviewed every two weeks and documented/shared with the relevant parties (e.g., a Line Manager or Senior Manager, Trade Union representative). If there is time-off resulting from sexual harassment at work, such as sickness or appointments for specialist support, this should not be counted towards sickness trigger points.

57. At work, the following support options are available for anybody who has experienced or witnessed sexual harassment, been accused of sexual harassment, or Line Managers who are dealing with sexual harassment grievances:

- Employee Assistance Programme (EAP) (available in the Employee Handbook).
- Occupational Health Services (for counselling).
- Trade Union (to act as a representative in Disciplinary Actions).

58. There are also additional external support services linked at the heading **External Links / Other Resources** below.

Confidentiality

59. The City Corporation will aim to deal with sexual harassment grievances sensitively and with respect for the privacy of all individuals involved. All employees must treat any information communicated to them in connection with an investigation or sexual harassment grievance as confidential sharing on a 'need-to-know' basis only.

60. Please note that electronic recording of meetings or hearings may be permitted so long as it is agreed by all parties. Consent for recordings (including for companions or witnesses) must be obtained from all relevant parties in advance of the meeting to ensure the scheduled hearing is not disrupted. Recording may also be required as a reasonable adjustment. This applies to meetings held in person, by telephone, or remotely using virtual technologies such as Teams.

61. If an employee refuses to the recording of a sexual harassment grievance procedure, the Investigation Officer must source a notetaker. The notetaker is subject to the same confidentiality requirements as all other parties.

62. The names of witnesses, whose evidence is relevant to the grievance procedure, may be disclosed to the individual under investigation unless it is believed that a witness's identity should remain confidential.

63. Any information collected during a sexual harassment grievance procedure, including meeting notes, emails, statements, and recordings (where agreed), will be stored securely in accordance with the Data Protection Policy.

Toolkit

64. Available in the Employee Handbook:

- Preventing Sexual Harassment Policy.
- Appendices:
  - Sexual Harassment Reporting Form.
  - Preventing Sexual Harassment Procedure.

- Sexual Harassment Process Map.

- Employee Guide: Sexual Harassment.
- Manager Guide: Sexual Harassment.
- Risk Assessment.
- Grievance Policy.

External Links / Other Resources

- ACAS.
- Citizens Advice Bureaux.
- Victims Support.
- Sexual assault referral centre.
- Rights of Women.
- Samaritans.
- LGBT Foundation.
- Galop- LGBT+ Sexual Violence Support.
- Rape Crisis England and Wales.
- The Survivors Trust.
- SurvivorsUK- For men and non-binary people affected by rape and sexual abuse.
- Government website support services.

Additional Training

65. Available on SAP: Find Learning – SAP SuccessFactors.

For All Staff

- Stand Up Against Street Harassment.

- Bystander intervention.
- Equally Yours.
- Inclusive communication.
- Conflict management.

For Managers

- Communicating as a manager.
- Crucial and difficult conversations.
- People manager grievance management.
- People manager leading diverse teams.

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Sexual Harassment Policy Appendices

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Appendix 1: Sexual Harassment Reporting Form

Introduction

We recognise that raising a concern about sexual harassment can be very distressing, and we are committed to handling all concerns with care, sensitivity, and respect.

Before completing this form, you may find it helpful to read the Preventing Sexual Harassment Policy, which explains how concerns are approached and the support available. The City of London Corporation is committed to preventing sexual harassment and to taking steps to protect you and others from sexual harassment risks going forward.

Once you have completed this form, please share it with your Line Manager, or with a Senior Manager if you do not feel it is appropriate to involve your Line Manager. If neither option is suitable or available to you, you may forward the form to your HR Business Partner. Details of your HR Business Partner can be found on the HR page of COLNET, or via the HR Service Desk if you do not have intranet access.

Experiencing sexual harassment can be extremely distressing. If you feel you would benefit from additional support at this time, there are a number of organisations that can offer help. These are listed in the **Links / Additional Materials** section of the Sexual Harassment Prevention and Action Policy.

Section 1: Employee details

Name:	Contact number:
Job title:	Location:
Department:	Section/Service:
Name of employee's Line Manager:	Name of employee's Senior Line Manager:

Section 2: The person the sexual harassment concern relates to (please fill out as much information as you can

Name:	Contact number:
Job title:	Location:
Department:	Section/Service:
Name of employee's Line Manager:	Name of employee's Senior Line Manager:

Section 3: Summary of incident

Incident information:	
Time and date of incident.	
Please provide a description of the incident *(please include as much information as possible and add additional pages if required).*	
Please provide details of witnesses of the incident.	
Have you told anybody about this incident? (if yes, please provide details of who).	
Have you notified the police?	
Supporting information	

Are you submitting any supporting documentation?	
Is there any additional evidence that you are aware of which you do not have access to? (e.g. CCTV, emails which other parties may have, etc.)	

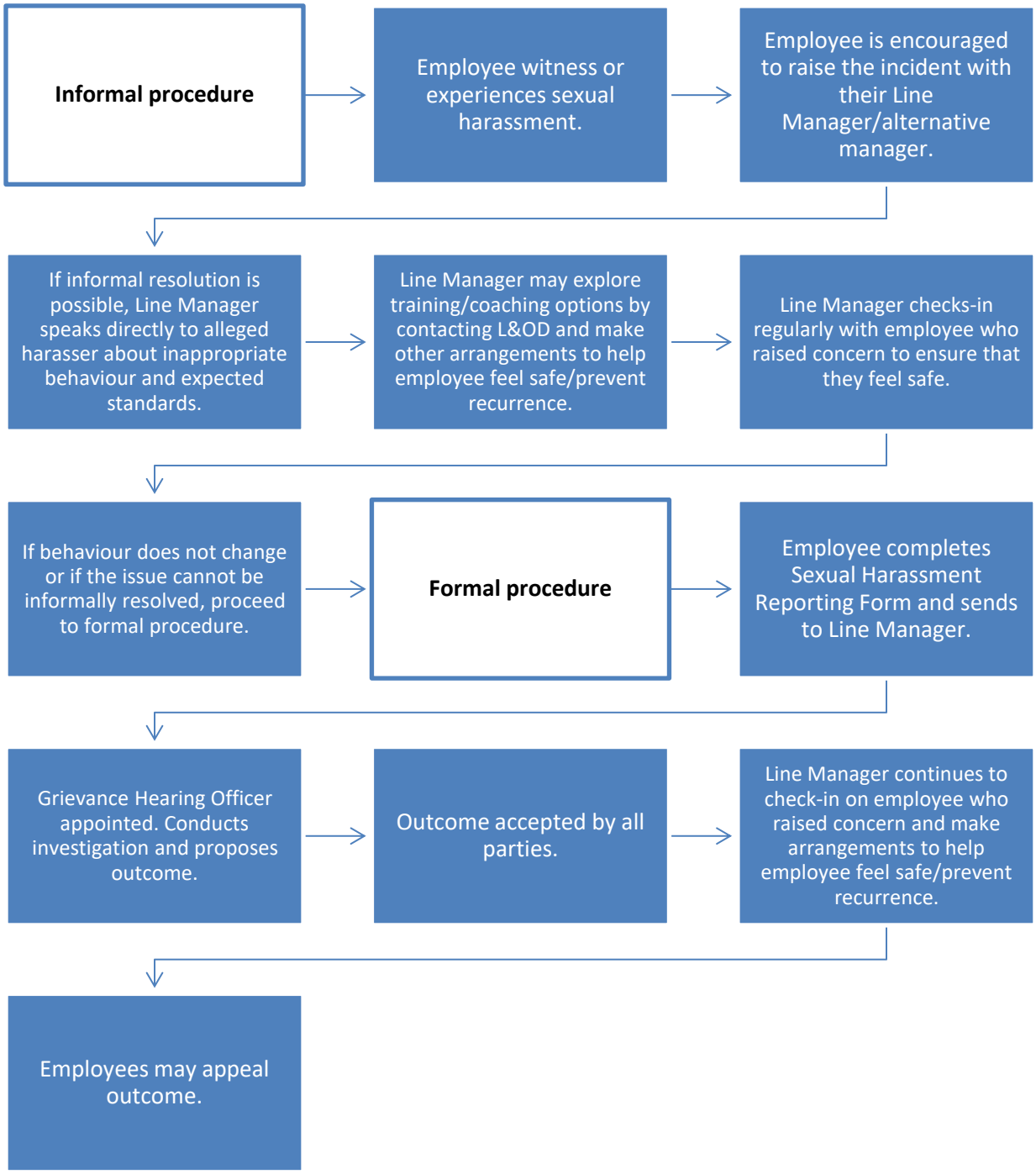
Section 4: The resolution

Outcome	
How would you like to see this resolved?	

Section 5: Signature and Date

Signature	Date

Appendix 2: Sexual Harassment Procedure Map


Informal procedure
Employee witness or experiences sexual harassment.
Employee is encouraged to raise the incident with their Line Manager/alternative manager.
If informal resolution is possible, Line Manager speaks directly to alleged harasser about inappropriate behaviour and expected standards.
Line Manager may explore training/coaching options by contacting L&OD and make other arrangements to help employee feel safe/prevent recurrence.
Line Manager checks-in regularly with employee who raised concern to ensure that they feel safe.
If behaviour does not change or if the issue cannot be informally resolved, proceed to formal procedure.
Formal procedure
Employee completes Sexual Harassment Reporting Form and sends to Line Manager.
Grievance Hearing Officer appointed. Conducts investigation and proposes outcome.
Outcome accepted by all parties.
Line Manager continues to check-in on employee who raised concern and make arrangements to help employee feel safe/prevent recurrence.
Employees may appeal outcome.