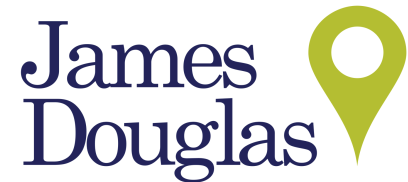


# Sexual Harassment in the Workplace Public Policy



Sexual Harassment in the workplace is unacceptable in any form and is not tolerated at James Douglas & Seraph Property Management.

If you are deemed to have breached our Sexual Harassment Policy, depending on the severity:

**Either**, you will be warned that continued provision of our services to you including but not limited to viewings, valuations, photo / measure appointments, property / estate management will cease if you act in a similar way again. Should the behaviour continue, you will be informed that our services to you will cease. Any criminal acts will be reported to the police.

**Or** we will cease providing any services to with immediate effect and any criminal acts will be reported to the police. This will including blacklisting you from future appointments, removing advertised properties from online portals and ceasing any Marketing.

Where you are a contractor or supplier to James Douglas & Seraph Property Management, the above will apply where we be warned of a termination of relationship/ we may terminate our relationship immediately.

This policy has been created based on the findings of our sexual harassment risk assessment for the company. A copy of this and our further control measures can be requested from the General Manager or a Director.#

We are dedicated to keeping this policy up to date by reviewing it annually and by speaking with employees to identify any new or existing issues.

Sarah Evans, General Manager has been appointed as the 'Responsible Person' for the prevention of sexual harassment in this business.

## **DEFINITION**

Sexual harassment is unlawful.

It is defined in the Equality Act 2010 as unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them, whether the perpetrator intended this or not.

- A person can be sexually harassed by someone of the same or a different sex. The behaviour does not need to be sexually motivated and includes worker to worker harassment, harassment by third parties, and harassment by agents acting on behalf of the employer.
- Conduct 'of a sexual nature' can include a range of behaviour, which includes but is not limited to, sexual comments or jokes, propositions and sexual advances, unwelcome touching, hugging, massaging, or kissing.
- Our internal risk assessment highlighted the following categories of risk:
- Worker-to-Worker Risks – this applies to our employees interacting with each other.
- Third Party Risks – this applies to our employees interacting with members of the public, customers, clients, contractors & suppliers.
- A relevant internal sexual harassment policy is in place for employees.

## **REPORTING PROCEDURES**

In the event of sexual harassment, it is important that you feel able to report it. If you feel that you have experienced sexual harassment from an employee of James Douglas / Seraph Property Management, you may speak directly with any director or the General Manager, in confidence about any event that you believe to be sexual harassment. You can do this by phone, email or arrange an in-person meeting. We encourage you to report any alleged offence, but it will be your decision whether you would like further action to be taken or not. In the event that you do not want further action to be taken, we will still make a record of the event.

The relevant person will undertake an investigation into the complaint which may include but not be limited to formal or informal conversations, analysis of written communications e.g. email, text etc. where appropriate and will also seek advice from their HR experts. The outcome will be followed up by all parties involved if further action has been requested.

A confidential log of all complaints will be made and kept secure to ensure that the relevant investigations and outcomes are correctly carried out and any patterns in behaviour are identified.