

Anti-harassment and dignity at work policy template

A policy is one reasonable step, not the whole duty - and an unacknowledged policy is barely that. Issue this, record who has seen it, and pair it with a risk assessment and training records. It covers what s.40A Equality Act 2010 expects, including the two things most policies omit: third-party harassment, and a way to report that bypasses the line manager.

The template

Replace each [bracketed placeholder]. Copy it straight from this page, or download the PDF above.

1. Our commitment

[Company name] is committed to a working environment where everyone is treated with dignity and respect. Harassment and bullying are not tolerated, whether by colleagues, managers, customers, clients, contractors or anyone else encountered through work. This policy applies to all employees, workers, agency staff and contractors, from their first day. It does not form part of any contract of employment and may be updated; the current version is always [location].

2. What harassment means

Harassment is unwanted conduct related to a protected characteristic - age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage or civil partnership, or pregnancy and maternity - which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment is unwanted conduct of a sexual nature. Conduct can amount to harassment even where it was not intended that way, and even where it was not aimed at the person affected. A single incident is enough.

3. Examples

Without limiting the above: unwanted physical contact; sexual advances, comments or propositions; sending or displaying sexual images; comments about someone's body or private life; jokes or banter based on a protected characteristic; mocking someone's accent, faith, age or disability; deliberate exclusion; spreading malicious rumours; repeated criticism intended to undermine; unwanted contact through personal social media. Conduct outside working hours - at a work event, on a work trip, or in a work chat group - is covered.

4. Harassment by third parties

You are entitled to the same protection from customers, clients, suppliers, contractors and members of the public as from colleagues. If you experience or witness this, report it under clause 6 - you are not expected to absorb it as part of the job. We will act, which may include speaking to the third party, changing how or whether we work with them, adjusting your duties so you do not face them again, or ending the relationship. [Where a role involves regular public contact, the specific measures for it are set out in [risk assessment / local procedure].]

5. Everyone's responsibilities

All of us are responsible for our own conduct and for not tolerating harassment of others. Managers have a further responsibility: to act on what they see or are told, whether or not a formal complaint is made, and to escalate to [role] rather than handling it quietly. A manager who is told about harassment and does nothing is a breach of this policy in their own right.

6. How to report it

You can raise a concern in any of these ways, and you may choose whichever you are most comfortable with:

- Speak to your line manager. - Speak to [alternative named contact], if you would rather not go to your manager - including where your manager is the person concerned. - Email [confidential address]. - Use the anonymous reporting route at [route]. We cannot investigate an anonymous report the way we can a named one, because we cannot come back to you with questions, but we do read all of them and we use them to spot patterns.

You do not have to raise it formally to be taken seriously, and you do not have to have told the person to stop first.

7. Informal resolution

Sometimes the quickest end to unwanted behaviour is telling the person it is unwelcome, and we will support you to do that if you want to - including having someone with you. You are never obliged to. Informal resolution is a choice available to you, not a stage you must complete before we will act, and it is never appropriate for serious allegations.

8. Investigation

Complaints are investigated promptly, fairly and as confidentially as the investigation allows. We will explain who is investigating, keep you updated, and tell you the outcome. The investigator will not be someone involved in the events. Where the allegations are serious we will consider whether anyone should be moved or suspended while we investigate - suspension is a neutral act and is not a disciplinary sanction. Findings are dealt with under the disciplinary procedure, and harassment may amount to gross misconduct.

9. No retaliation

Victimising someone for raising a concern in good faith, or for supporting or giving evidence in an investigation, is itself a disciplinary matter and will be treated as seriously as the original allegation. This applies to a complaint that is not upheld: an unproven allegation made honestly is not a false one.

10. What we do to prevent it

We assess where the risk of harassment is higher in this business and act on it, and we review that assessment at least [annually] and after any significant incident. We train all staff on this policy at induction and [annually] after that, with additional training for managers. We record who has been trained and who has acknowledged this policy. We review anonymised reporting data [quarterly] to look for patterns. [Role] is accountable for this policy.

11. Records

Records of complaints and investigations are kept securely, accessible only to those who need them, and retained for [period] in line with our retention schedule. Records of policy acknowledgements, training completion and risk assessments are retained as evidence that we have met our duty to take reasonable steps to prevent sexual harassment.

Using it well

The policy is the easy part. Three things decide whether it is worth anything if the duty is ever examined.

- Issue it and record the acknowledgements. Named, dated, and reissued when it changes. An unacknowledged policy is close to no policy.
- Name a real alternative contact in clause 6. "Contact HR" is not a route in a 15-person company where HR reports to the person concerned. Use a name, and make sure that person knows.
- Do clause 10 before you need it. The risk assessment is the document that most distinguishes an employer who took reasonable steps from one who had a document.

This is a starting point for a general UK employer and is not legal advice. Sectors with high public contact, lone working or alcohol at work should expect their risk assessment to do more work than this template can.

A free template from CoDash - codash.co.uk/templates. Edit it to match how your company actually works, and take advice on anything unusual.