



Sexual Harassment in the Workplace Policy (1222/2025)

Abstract

This policy and procedure details Sussex Police's sexual harassment policy.

Policy

1. Introduction

1.1 The Force has a zero-tolerance policy in relation to sexual harassment.

1.2 Sexual Harassment is unlawful under the Equality Act 2010. It is also contrary to the Code of Ethics which require members of the Force to act with respect and courtesy and not to discriminate unlawfully or unfairly.

1.3 The aim of this policy is to; -

- Advise what constitutes sexual harassment.
- Make clear the professional behaviour expected of all officers, staff police support volunteers (PSVs), contractors, workers and prospective job applicants. (Policy will be published in accordance with the Freedom of Information Act 2000)
- Empower those to raise a complaint by setting out a clear process.
- Support those who are affected by sexual harassment.
- Make clear the responsibility on the Force, and managers, to remove sexual harassment from the workplace.
- Make clear the expectation of all members to challenge sexual harassment if observed or otherwise believed to be happening in the workplace.
- The Code of Ethics requires officers and staff to challenge and report improper conduct.
- To ensure individuals know the support available in the Force.

2. Scope

2.1 This policy applies to members of the Force which includes police staff, student police officers, police officers, special constabulary and volunteers, workers and contractors. It provides information on how to report and investigate an incident of sexual harassment and the support available to individuals.

3. Statement

3.1 The Force is committed to providing an inclusive and welcoming working environment for all officers, staff and PSVs, free of sexual harassment and victimisation and where everyone can feel supported, safe and reach their potential.

Procedure

1. Definitions

1.1

I. Sexual Harassment: - Occurs when a person engages in unwanted conduct of a sexual nature that has the purpose or effect of:

- Violating someone's dignity, whether intended or not.
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for them, whether intended or not.

Although anyone can experience sexual harassment, contemporary research indicates that women are more likely to experience sexual harassment and perpetrators of sexual harassment are overwhelmingly men.

ii. Victimisation - When you are treated poorly or unfairly because you have made a complaint related to a protected characteristic or you have helped someone else who has raised a complaint and are seen to be siding with them and are then treated badly.

2. Responsibilities

2.1 We all have a responsibility to create and maintain a work environment free of harassment and victimisation and to treat our colleagues with dignity and respect.

2.2 Individuals are responsible for: -

- Being aware of how their behaviour may affect others.
- Treating colleagues with dignity and respect.
- Taking a stand if inappropriate jokes, comments, or gestures are being made.
- Making it clear to others when their behaviour is unacceptable.
- Intervening to stop sexual harassment and discreditable conduct and giving support to anyone who may have been harassed.
- Reporting harassment to a manager, People Services or Professional Standards Department (PSD) and co-operating as required in investigations.
- If a complaint of harassment is made, not prejudging, or victimising the complainant or alleged harasser.

Please note that simply ignoring and/or walking away from such incidents or refusing to get involved is not acceptable and may even be seen as collusion allowing it to continue within the policing culture. Sexual harassment must be challenged and reported.

2.3 Managers have a responsibility to: -

- Implement the zero-tolerance policy on sexual harassment.
- Set a good example by their own behaviour.
- Ensure that there is a proactive and supportive working environment.
- Make sure that staff know the standard of behaviour that is expected of them.
- Intervene to stop bullying or harassment.
- Report promptly to PSD any complaint of harassment, or any incident of harassment witnessed by them and ensure that appropriate steps are actioned.

2.4 The Force has responsibility to ensure that sexual harassment will not be tolerated in the workplace and that complaints will be taken seriously, will be dealt with quickly and will be treated as serious disciplinary offences and may be considered as gross misconduct.

3. General

3.1 Sexual harassment can happen regardless of the individual's or alleged perpetrators gender identity or sexual orientation.

The Force recognise, however, that women are significantly more likely to experience sexual harassment and that there is a gender equality issue in relation to sexual harassment. If sexualised behaviour and sexual objectification of women is perceived to be tolerated in the workplace, it is more likely that sexual harassment will occur.

The Force also recognise that there is an issue of intersecting protected characteristics in relation to sexual harassment, and that there may be additional concerns for Black or minoritised officers and staff, Lesbian, Gay, Bisexual and Transgender (LGBT+), disabled and younger workers where the harassment may be bound up with other forms of discrimination. For information about support groups relevant to protected characteristics refer to point 9.2 within this policy document.

3.2 Sexual harassment in the workplace may occur from: -

- Someone you work with.
- A manager, supervisor, or someone else in a position of authority.
- A member of the public / visitor.

3.3 Sexual harassment includes a wide range of behaviours including but not limited to:

- Sexual comments or jokes. Such behaviour must never be dismissed or excused as banter.
- 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.

- Uninvited discussion of one's sex life or inappropriate discussion of sex life.
- Sexual posts or contact on social media.
- Spreading sexual rumours about a person.
- Sending or requesting sexually explicit emails or text messages.
- Unwelcome touching, hugging, massaging, or kissing.
- Predatory behaviour.
- Criminal behaviour, including sexual assault, stalking, grooming, indecent exposure and sending offensive communications.
- Coercion.

3.4 Sexual harassment is usually directed at an individual or minority group, but that is not always the case. It may be perpetrated by one individual, a pair, a small group, a large group, or to permeate through a whole section of the Force.

3.5 Sometimes there can be a culture of sexual harassment in a workplace that is not specifically aimed at one person – such as sharing sexual images and leering at members of the public or members of the Force. Someone would be entitled to make a complaint of sexual harassment in this situation.

3.6 An individual can experience sexual harassment from someone of the same or different gender and the recipient of the behaviour decides whether the approach was unacceptable or undignified.

3.7 Sexual harassment can be a one-off event and does not need to be directed at a person. It can be witnessed or overheard. Sexual conduct that has been welcomed or tolerated in the past may, over time, become unwanted and if it continues becomes harassment.

3.8 Forces are liable for sexual harassment committed by their officers, staff, or PSVs during their employment / volunteering unless they can show that they took all reasonable steps to prevent the harassment. 'In the course of employment' includes acts committed in any other place where work is conducted such as offsite, at a training course, conference, or external meeting, as well as other circumstances in which the officer / staff member is not actually working but relate to work, such as at a leaving party or other social event.

3.9 The Force recognise that sexual harassment of their officers / staff can also take place outside in the public arena. This should be dealt with positively using appropriate legislation and raised with the individual's line manager so that suitable welfare measures can be taken.

3.10 Section 40a of the Equality Act 2010 imposes a duty on employers to take reasonable steps to prevent sexual harassment of their employees in the course of their employment. Refer to Employer duty to prevent sexual harassment of employees.

3.11 Equality, Diversity and Inclusion.

It is important to understand and recognise that the Equality Act 2010 was introduced to legally protect people from discrimination in the workplace and in wider society.

The Force is required to comply with the Equality Act 2010, and in particular Section 149 the Public Sector Equality Duty (PSED), which requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different groups of people when carrying out their activities. For further information refer to the Equality, Diversity and Inclusion Policy (Surrey and Sussex) (193).

4. Taking Action

4.1 The Force wants to provide a professional working environment for its officers, staff and volunteers and has a 'duty of care' to do so. Everyone has the right to a working environment free of harassment, from others within the service and members of the public. The Force will proactively support such a working environment.

4.2 The Force will ensure reasonable action is taken to prevent sexual harassment in the workplace and ensure there is support available for anyone who feels they have had their dignity violated or where an individual(s) has created an intimidating, hostile, degrading, humiliating or offensive environment, whether intended or not.

4.3 Reasonable action includes: -

- Setting standards and a culture so all are made aware that such behaviour will not be tolerated.
- Providing opportunities for teams to discuss sexual harassment and the importance of tackling unlawful and discriminatory practices.
- Ensuring there is a clear reporting process in place (section 7 of this policy).
- Ensuring accusations are fully investigated and appropriate action taken.
- Ensuring support is available to individuals affected by sexual harassment. (section 9 of this policy).

5. Setting Standards

5.1 Standards of professional behaviours are set by The Police (Conduct) Regulations 2020 and the Police Staff Council Joint Circular 54.

5.2 The Code of Ethics is the starting point of behaviours and attitudes for everyone who works in policing in England and Wales. It sets out the principles and standards of behaviour we expect to see from police professionals. It applies to every individual who works in policing, whether a warranted officer, member of police staff, volunteer or someone contracted to work in a police force.

5.3 For the purpose of this policy the following standards are highlighted.

- Members are expected to act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy.

- Members should not abuse their powers or authority and respect the rights of all individuals.
- All members are to challenge and report improper conduct.

5.4 A breach of the standards of professional behaviour could damage public confidence in the police service.

5.5 Any breach of any of the standards could potentially lead to disciplinary action, which in serious cases may result in dismissal without notice.

6. Training

6.1 Training and information are crucial to the success of policies on sexual harassment and in changing the workplace environment.

Training programmes should include:

- Details on the policy, its implementation, and promotion.
- What misogyny, sexism and sexual harassment mean, their effects and consequences.
- What victimisation means.
- How to report incidents and unacceptable behaviour.
- How to address issues of third-party harassment if applicable.
- How to get support.
- The help available to those being harassed.

Records should be kept ensuring that everyone is trained and that they regularly receive refresher training. Officers and staff should also be encouraged to help each other, either by lending support or informing management of their concerns through the appropriate channels. The training should also make it clear that staff have a right to be accompanied by a staff association / trade union representative at all stages.

6.2 Sexual harassment in the workplace College of Policing training module can be accessed via College Learn.

7. Clear Reporting Process

7.1 Individuals are encouraged to come forward if they believe they have been harassed. The Force has robust procedures in place designed to promptly take action without isolating the complainant.

7.2 Wherever possible, the Force will try and ensure the individual and alleged harasser are not required to work together whilst the complaint is under investigation.

7.3 Individuals who have been harassed should raise the issue to their line manager, another trusted line manager within the organisation, People Services or the Anti-Corruption Unit (ACU) within PSD. Individuals who report breaches of the Standards of Professional Behaviour may be afforded 'whistle-blower' protections. Reports can also be made anonymously to the ACU via the Force confidential reporting system, Break the Silence. Reporting via Break the Silence may limit the options available to the Force to

take action to prevent the harassment, therefore individuals who report anonymously via Break the Silence, are strongly urged to log back into the system to view any responses from ACU.

7.4 Individuals can also offer information anonymously via SIGNA, the online Force approach in capturing information relating to emerging issues, lived experiences or existing cultures. Submissions will be triaged and reviewed at a dedicated working group to identify any potential patterns of sexual harassment, cultures with potential to harbour breaches of our professional standards and discuss positive intervention. The aim is to further highlight colleagues' personal experiences, so that we can encourage debate and foster greater confidence in the Force's ability to challenge sexual harassment in the workplace. For further information on SIGNA refer to Everyday Sexism - Knowing the Line.

SIGNA is not a formal way to raise complaints - this must be done via your line manager, a trusted line manager within the organisation, People Services, PSD or by using Break the Silence.

7.5 If an individual becomes aware of sexual harassment between a colleague and another individual, it is your responsibility to raise the issue to a line manager, another trusted line manager within the organisation, People Services, or the PSD. Individuals who report breaches of the Standards of Professional Behaviour to ACU can be afforded 'whistle-blower' protections. Reports can also be made anonymously to the ACU via Break the Silence. Reporting via Break the Silence may limit the options available to the Force to take action to prevent the harassment, therefore individuals who report anonymously via Break the Silence, are strongly urged to log back into the system to view any responses from ACU.

7.6 Sexual harassment can also give rise to situations where there is coercive or predatory behaviour. If intimate relationships arise between colleagues and if anyone has concerns about any predatory or coercive element to the relationship, they are encouraged to report the issue to a line manager, another trusted line manager within the organisation, People Services, PSD or anonymously via Break the Silence. Any individuals entering into a workplace relationship should also read the Appropriate Personal Relationships, Conflicts of Personal Interests and Behaviours in the Workplace (Surrey and Sussex) (1207) to understand the expectations placed upon them.

7.7 Investigations into complaints or allegations of sexual harassment may also lead to a criminal investigation being instigated. Where there are concerns that a criminal act has taken place, advice must be taken from PSD. If a criminal act is suspected any action taken must avoid prejudicing the criminal investigation. Appropriate action will be taken depending on the circumstances.

7.8 Any investigations into allegations of sexual harassment by police staff, student police officers, police officers, special constabulary and volunteers, workers and contractors will be conducted by PSD, with the support of other departments / teams where appropriate.

7.9 Confidentiality will be maintained, subject to any requirement to involve external agencies where a criminal offence may have been committed or where maintaining confidentiality would pose a risk to the person making the report, or to others.

7.10 Anyone can contact a Sexism and Sexual Harassment Mentor for advice, guidance or to seek support. These mentors can help in the referring process or can offer emotional support to those subjected to this behaviour.

This was created to provide visibility across all Divisions, Departments, ranks and roles and consists of volunteers of different ranks and roles within the Force. The mentors involved do this role in addition to their day-to-day job.

For a list of Sexism and Sexual Harassment Mentors refer to Evolve - Sexual Harassment and Everyday Sexism in the workplace

8. Misconduct Process

8.1 The alleged perpetrator, if a member of the Force, will be fairly investigated through the appropriate process.

8.2 All complaints of sexual harassment will be taken very seriously. The Force will handle any investigation in a way that's fair and sensitive to:

- The person who made the complaint
- Someone who witnessed it
- Someone who has been accused of sexual harassment

The welfare of these individuals will be of utmost importance and where necessary a Welfare Officer will be appointed.

8.3 An individual who sexually harasses someone at work will be held responsible for their actions and if a member of the Force faces an investigation into their conduct at work, this could result in disciplinary action up to and including summary dismissal. In addition, they could be held personally liable to pay compensation in legal claims.

9. Support and Advice for Individuals

9.1 There are many sources of support available. These include:-

- Line Managers
- People Services
- Professional Standards Department
- Break the Silence
- Sexual Harassment and Everyday Sexism in the workplace
- Domestic Abuse Internal Survivors Group
- Police Federation
- Police Superintendents Association

- Unison
- Employee Assistance Programme (EAP)
- Christian Police Association (CPA)
- Police Chaplaincy
- Race Equality Network (REN)
- Lesbian, Gay, Bisexual, Transgender + Network
- Proud Allies
- Enable Disability and Carers Network
- Evolve Gender Equality Network
- Whistleblowing Procedure found in the Anti-Fraud, Corruption and Bribery Policy (Surrey and Sussex) (612)
- Welcome to the Occupational Health Hub
- Inclusion Hub
- Welcome to the Wellbeing Hub

For further information about support in relation to the 9 protected characteristics, refer to section 9.2 within this policy.

9.2 The Force has several support groups relevant to protected characteristics – Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation.

The groups provide specialist support, advice and guidance services to police officers and police staff, promote equality of opportunity and good relations between the organisation and people who identify with a protected characteristic. The available Staff Networks can be located [this link](#) Staff Networks.

10. Related Policies and Documents

10.1 This policy should be read in conjunction with the following Force documents and policies:

- Code of Ethics
- Appropriate Personal Relationships, Conflicts of Personal Interests and Behaviours in the Workplace (Surrey and Sussex) (1207)
- Anti-Fraud, Corruption and Bribery Policy (Surrey and Sussex) (612)
- Police Staff Disciplinary Policy (Surrey and Sussex) (797)
- Equality, Diversity and Inclusion Policy (Surrey and Sussex) (193)
- The Police (Conduct) Regulations 2020

Team: Professional Standards Department

