

Sexual Harassment Policy

Date Issued: June 2025
Issued by: Head Office



Frontline Recruitment Group is committed to ensuring that all its staff and applicants are treated with dignity and respect and treat others in the same way. We believe that all staff and applicants have the right to work in an environment which is free from any form of harassment, including sexual harassment.

Frontline Recruitment Group has a zero-tolerance approach to sexual harassment.

Frontline Recruitment Group is committed to ensuring that reasonable steps are taken to prevent sexual harassment to all employees, workers, and applicants. This policy will be reviewed and updated from time to time to ensure Frontline Recruitment Group's compliance with its duties under the Equality Act 2010 as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023 to ensure that all reasonable steps are taken to prevent sexual harassment.

Harassment

Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual, including conduct of a sexual nature.

Sexual Harassment

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, Frontline Recruitment Group is committed to providing a work environment free from unlawful sexual harassment.

- 1.1 Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or the effect of:
 - 1.1.1 violating the victim's dignity; or
 - 1.1.2 creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.
- 1.2 An individual of any gender may be the victim of sexual harassment.
- 1.3 Whilst not an exhaustive list, forms of sexual harassment can include:
 - 1.3.1 Slurs or unwanted sexual advances;
 - 1.3.2 Visual conduct such as derogatory or sexually oriented posters;
 - 1.3.3 Physical conduct such as assault, unwanted touching, or any interference because of sex, race, or any other protected characteristic basis;
 - 1.3.4 Threats and demands to submit sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours;
 - 1.3.5 Sexual comments or jokes;
 - 1.3.6 Unwelcome touching, hugging, massaging, or kissing.
- 1.4 If an individual believes that they have been sexually harassed, they should make an immediate report to David Essam or Alison Starbuck followed by a written complaint as soon as possible after the incident. The details of the complaint should include:
 - 1.4.1 Details of the incident
 - 1.4.2 Name(s) of the individual(s) involved.
 - 1.4.3 Name(s) of any witness(es)
- 1.5 Frontline Recruitment Group will undertake a thorough investigation of the allegations. If it is concluded that harassment has occurred, remedial action will be taken.
- 1.6 Where an incident/complaint of sexual harassment relates to a temporary agency worker the Frontline Recruitment Group will not carry out instructions from a hirer/and/or intermediary which it considers will amount to sexual harassment and victimisation.
- 1.7 Frontline Recruitment Group will take reasonable steps to safeguard temporary workers it supplies and internal members of staff from harassment.
- 1.8 Frontline Recruitment Group will ensure that the hirer has a sexual harassment policy in place, and this is given to the employee or worker.
- 1.9 Frontline Recruitment Group will ensure that all staff are given training on sexual harassment, and this is monitored and done on a [quarterly] basis/ or regular training will be provided to all staff on sexual harassment.
- 1.10 Frontline Recruitment Group will carry out due diligence checks on hirers/intermediaries who we engage in the supply of temporary agency workers to ensure that they are taking reasonable steps to carry out their duties as employers under

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the Equality 2010. another company are protected under this provision. This could apply to employment businesses and intermediaries that supply their own workers to a client/hirer.

2. All employees and workers will be expected to comply with Frontline Recruitment Group's policy on sexual harassment in the workplace. Any breach of such a policy will lead to appropriate disciplinary action.
3. Employees who Frontline Recruitment Group finds to be responsible for sexual harassment will be subject to disciplinary procedures and the sanction may include termination.
4. Temporary workers who Frontline Recruitment Group finds to be responsible for sexual harassment will be subject to Frontline Recruitment Group's complaints procedure even where such sexual harassment involves individuals who are not engaged by Frontline Recruitment Group.

Complaints and monitoring process

Frontline Recruitment Group has procedures for monitoring compliance with this policy and for dealing with complaints of sexual harassment in place. These are available from Alison Starbuck and will be made available immediately upon request. Any discrimination complaint will be investigated fully.