

Groundwork Yorkshire

THIS POLICY APPLIES TO:

GROUNDWORK YORKSHIRE LIMITED AND ITS SUBSIDIARIES:

(COMPANY NUMBER 2202681; REGISTERED CHARITY 519849)

GROUNDWORK GOLF LIMITED

(COMPANY NUMBER 8114265)

GROUNDWORK PRIDE LIMITED

(COMPANY NUMBER 02871169)

JOBMATCH (UK) LIMITED

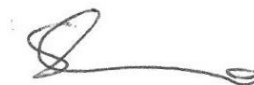
(COMPANY NUMBER 07677305)

PREVENTION OF SEXUAL HARASSMENT IN THE WORKPLACE

APPENDIX E - THIRD PARTY HARASSMENT PROCEDURE

This guidance applies to all third parties that work for or with Groundwork Yorkshire and its subsidiaries or that encounter Groundwork Yorkshire staff (and the staff of its subsidiaries) during the course of their duties.

Developed By:	Co-Chief Executive
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Approved By:	Sarah Munro
Review Date:	30-09-27
Version:	Version 1



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Appendix E - Third-Party Harassment Procedure

This appendix will be communicated to third parties and made publicly available on the Groundwork Yorkshire website. It should be read in conjunction with Groundwork Yorkshire's Prevention of Sexual Harassment in the Workplace Policy, (available on request from Groundwork Yorkshire). The appendix sets out the standards of conduct expected of all third parties who interact with Groundwork Yorkshire's employees, workers, volunteers and representatives, and explains the steps that may be taken to address unacceptable behaviour, including harassment.

E1. Purpose

Groundwork Yorkshire is committed to providing a working environment that is safe, respectful and free from harassment.

The organisation recognises that sexual harassment and other forms of unlawful harassment may be carried out not only by employees and workers but also by third parties, including service users, clients, beneficiaries, customers, contractors, suppliers, partners, visitors and members of the public.

This procedure sets out the arrangements for preventing, identifying, reporting, investigating and responding to incidents of third-party harassment and forms part of Groundwork Yorkshire's duty to take all reasonable steps to prevent sexual harassment.

E2. Scope

This procedure applies to harassment committed by any third party interacting with Groundwork Yorkshire workers, including:

- Service users
- Beneficiaries
- Clients
- Customers
- Contractors
- Suppliers
- Partner organisations
- Landowners
- Visitors
- Volunteers
- Members of the public
- Event attendees
- Training participants

The procedure applies to:

- Offices
- Community venues
- Home visits
- Outdoor sites
- Public events
- Training sessions
- Conferences
- Business travel
- Online meetings
- Social media interactions
- Telephone communications
- Email and messaging platforms

E3. Definition of Third-Party Harassment

Third-party harassment occurs where a worker is subjected to unwanted conduct by a person who is not employed by Groundwork Yorkshire and the conduct:

- Violates the individual's dignity; or
- Creates an intimidating, hostile, degrading, humiliating or offensive environment.

Examples include:

- Sexual comments made by service users.
- Inappropriate remarks about appearance.
- Requests for personal contact details.
- Repeated unwanted invitations.
- Sexual jokes or innuendo.
- Sharing sexual images.
- Unwanted physical contact.
- Harassment through social media.
- Harassing emails or messages.
- Stalking behaviour.
- Intimidating conduct linked to rejection of advances.

This list is not exhaustive.

E4. Preventative Controls

Groundwork Yorkshire will take proactive steps to reduce the risk of third-party harassment.

Controls may include:

- Policies and Communication
- Clear behavioural expectations.
- Codes of conduct for clients and service users.
- Event behaviour standards.
- Visitor guidance.
- Training
- Sexual harassment awareness training.
- Personal safety training.
- Lone working training.
- Conflict management training.
- Manager training.
- Risk Assessments
- Home visit assessments.
- Event risk assessments.
- Service-specific reviews.
- Lone working assessments.
- Environmental Controls
- Safe meeting locations.
- Check-in procedures.
- Personal alarms where appropriate.
- CCTV and site security measures.
- Escalation arrangements.

E5. Reporting Incidents

Any incident of actual or suspected harassment by a third party must be reported. Reports may be made through:

- Line managers.
- Alternative managers.
- HR.
- Safeguarding Leads.
- Senior managers.

Employees are encouraged to report incidents immediately or as soon as reasonably practicable after they occur.

Witnesses are also encouraged to report concerns.

No employee will be criticised or disadvantaged for reporting concerns in good faith.

E6. Immediate Management Response

Upon receiving a report, managers must:

- **Step 1: Ensure Safety.** Consider whether:
 - Immediate danger exists.
 - Emergency assistance is required.
 - Police attendance is necessary.
 - Safeguarding concerns are present.

- **Step 2: Support the Individual.** Managers should:
 - Listen appropriately.
 - Reassure the individual.
 - Explain next steps.
 - Discuss immediate support requirements.
- **Step 3: Record the Incident.** The manager must record:
 - Date and time.
 - Location.
 - Individuals involved.
 - Description of behaviour.
 - Witness details.
 - Immediate actions taken.
- **Step 4: Inform HR.** the incident should be referred to HR as soon as reasonably practicable.

E7. Risk Assessment

A documented risk assessment must be completed following any reported incident. The assessment should consider:

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| <ul style="list-style-type: none"> • Severity • Nature of the behaviour. • Frequency. • Escalation potential. • Physical safety concerns. • Vulnerability • Recurrence • Supporting vulnerable individuals | <p>Whether the affected individual is:</p> <ul style="list-style-type: none"> • A lone worker. • A volunteer. • An apprentice. • A temporary worker. |
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Consider:

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| <ul style="list-style-type: none"> • Previous incidents involving the same individual. • Complaints from other staff. | <ul style="list-style-type: none"> • Emerging behavioural patterns. • Wider Risk |
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The assessment should determine whether:

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| <ul style="list-style-type: none"> • Other staff may be affected. • Service users may be affected. | <ul style="list-style-type: none"> • Further incidents are likely. |
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E8. Interim Control Measures

Managers may implement precautionary measures while a matter is reviewed. These may include:

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| <ul style="list-style-type: none"> • Alternative staffing arrangements. • Paired working. • Alternative venues. • Modified service delivery arrangements. | <ul style="list-style-type: none"> • Management supervision. • Suspension of visits. • Restricting communication channels. |
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Control measures should be proportionate to the risk identified.

E9. Investigation

The organisation will determine the appropriate level of investigation. This may include:

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|--|---|
| <ul style="list-style-type: none"> • Speaking with the affected worker. | <ul style="list-style-type: none"> • Reviewing records and communications. |
|--|---|

- Interviewing witnesses.
- Reviewing CCTV or security records.
- Contacting partner organisations.
- Assessing previous incident reports.

Investigations will normally follow the principles outlined in Appendix B.

E10. Escalation Procedures

Where risk remains significant, incidents should be escalated. Potential escalation routes include:

- **Management Escalation** – referral to Senior managers, Chief Executives or Trustees where appropriate.
- **Safeguarding Escalation** - where concerns involve children or adults at risk.
- **Contractual Escalation** - where external organisations are involved.
- **Criminal Justice Escalation** where criminal offences may have occurred.

E11. Warnings

Where appropriate, Groundwork Yorkshire may issue warnings to third parties. Warnings may be:

- Verbal (suitable for low-level first incidents)
- Written (suitable where: behaviour is serious, previous warnings exist, behaviour has continued). Warnings should explain: expected standards of behaviour, consequences of further incidents, restrictions that may be imposed.
- Copies should be retained on relevant records.

E12. Restrictions and Exclusion

Groundwork Yorkshire reserves the right to restrict or terminate engagement with third parties whose behaviour places staff, volunteers or others at risk. Actions may include:

- Restricted Contact
- Telephone contact only.
- Written communication only.
- Contact through nominated staff.
- Supervised Contact
- Meetings only in supervised settings.
- Requirement for more than one staff member to attend.
- Service Restrictions
- Alternative service arrangements.
- Withdrawal of discretionary services.
- Referrals to alternative providers where appropriate.
- Site Exclusion
- Temporary exclusion.
- Permanent exclusion from premises.
- Exclusion from events and programmes.

Any restriction must be proportionate and documented.

E13. Contractors, Suppliers and Partner Organisations

Where allegations involve a contractor, supplier or partner organisation, Groundwork Yorkshire may:

- Require investigation by the organisation concerned.
- Require corrective action.
- Require replacement personnel.
- Escalate through contract management arrangements.
- Suspend contracts.
- Terminate contracts where appropriate.

The organisation's contractual arrangements should, wherever possible, include provisions relating to harassment, conduct and workplace safety.

E14. Police Involvement

Groundwork Yorkshire will support individuals who wish to report criminal conduct to the police. Police involvement should be considered where allegations involve:

- Sexual assault.
- Stalking.
- Threats of violence.
- Hate incidents.
- Persistent harassment.
- Criminal damage.
- Online abuse amounting to a criminal offence

The organisation may also contact the police directly where there is an immediate risk to safety.

E15. Support for Affected Individuals

Support may include:

- Manager support.
- HR support.
- Safeguarding support.
- Wellbeing support.
- Occupational Health referral.
- Employee Assistance Programme access.
- Flexible working arrangements.
- Temporary workplace adjustments.

Managers should maintain regular welfare contact with affected individuals.

E16. Monitoring and Learning

All incidents of third-party harassment must be recorded centrally. HR will monitor:

- Number of incidents.
- Locations.
- Service areas.
- Repeat offenders.
- Risk trends.
- Actions taken.

This information will be used to:

- Improve prevention measures.
- Identify emerging risks.
- Improve staff training.
- Inform Trustee reporting.

E17. Annual Review

The effectiveness of this procedure will be reviewed annually through:

- Incident analysis.
- Staff feedback.
- Risk assessment reviews.
- Training compliance data.
- Service reviews.
- Trustee scrutiny.

Where patterns of third-party harassment are identified, the organisation will review whether additional preventative steps are required to ensure compliance with its duty to protect workers from harassment by third parties.

Third-Party Harassment Response Flow

1. Incident occurs
2. Incident reported
3. Immediate safety assessment
4. Manager records concern
5. Risk assessment completed
6. Interim safeguards considered
7. Investigation undertaken where required
8. Warning, restriction or exclusion considered
9. Police or safeguarding referral where appropriate
10. Support provided to affected worker
11. Incident logged and monitored
12. Lessons learned reviewed and actions implemented