



THIRD-PARTY SEXUAL HARASSMENT POLICY

1. Introduction

At Data Technology Ltd, we are committed to ensuring that all members of our workforce are treated with dignity and respect in the workplace. We recognise that sexual harassment is unlawful under the Equality Act 2010 and have a zero-tolerance approach to any form of harassment, including from third parties.

This policy applies to all employees, agency workers, contractors, consultants, and volunteers. It outlines:

- What third-party sexual harassment is.
- How we prevent and respond to incidents.
- Support available for affected employees.

Sexual harassment of our workforce by third parties will not be tolerated, and we will take all reasonable steps to prevent it.

2. Definition of Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that:

1. Violates a person's dignity, or
2. Creates a hostile, degrading, humiliating, or offensive environment for them.

Examples include (but are not limited to):

- Unwanted sexual comments, jokes, or gestures.
- Inappropriate touching, groping, or invasion of personal space.
- Displaying sexually suggestive material.
- Sending or showing explicit messages or images.
- Repeated requests for dates or sexual favours.
- Threatening retaliation for rejecting advances.

3. What is Third-Party Sexual Harassment?

Third-party sexual harassment occurs when an individual is harassed by someone who is not employed by Data Technology Ltd but is encountered in connection with work. This may include:

- Customers, clients, or suppliers
- Candidates, contractors, and consultants
- Members of the public (e.g., at events, conferences, or site visits)

Sexual harassment from a third party is unlawful, and we have a duty to take reasonable steps to prevent it.

4. Prevention Measures

To prevent third-party sexual harassment, Data Technology Ltd will:

- ✓ Include a zero-tolerance policy in customer and supplier agreements.
- ✓ Provide training for employees on identifying and reporting third-party harassment.
- ✓ Display this policy on our website and internal communication platforms.
- ✓ Ensure our workforce knows their rights and how to escalate concerns

Prevention in Service Contracts:

- Third parties engaging with our workforce will be made aware of our policy via contract clauses and documentation.
- Any third-party organisation that fails to prevent sexual harassment within their environment may have services terminated.

5. Reporting Third-Party Sexual Harassment

If you experience or witness third-party sexual harassment, you should:

1. Report it immediately to your line manager or HR.
2. If the harasser is a customer or supplier, HR will formally raise the concern with their organisation.
3. If the harasser is a member of the public, appropriate action (e.g., reporting to security, law enforcement) will be taken.
4. If necessary, we may withdraw employees from certain sites to ensure their safety.

6. Response & Action

When a third-party sexual harassment complaint is received, we will:

1. Conduct a confidential investigation.
2. Warn the third party about their behaviour and issue a formal notice.
If necessary, cease working with the third party.

3. In cases involving criminal behaviour, report the matter to the police.
4. Provide support to affected employees, including our Employee Assistance Programme.

7. Support for Employees

Employees who experience or report harassment will receive:

- Confidential support from HR.
- Access to an Employee Assistance Programme (if available).
- Protection from victimisation—we will not tolerate retaliation against those who report harassment.
- Regular updates about the progress of their case.

8. Disciplinary Measures

We will not tolerate sexual harassment by our workforce against third parties.

- Employees who harass third parties will face disciplinary action, up to and including dismissal.
- Managers who fail to act on reports of third-party harassment may also face disciplinary consequences.

9. Data Protection & Confidentiality

All reports of sexual harassment will be:

- Handled with confidentiality in compliance with UK GDPR and Data Protection Act 2018.
- Stored securely and only accessed by HR or designated investigators.
- Reviewed periodically to assess the effectiveness of our harassment policies.

10. Conclusion

At Data Technology Ltd, we are committed to ensuring that our workplace remains safe, respectful, and free from harassment. We encourage employees to report concerns without fear of reprisal and will take all necessary steps to protect our workforce.

For further information, employees can contact HR or request a copy of the full Sexual Harassment Policy.