



POLICY

Sexual Harassment Policy (CP.019)

VGC Value – “We look after each other” - Diversity is our strength

Commitment

At VGC, we are committed to ensuring that all employees, workers, applicants, and third parties are treated with dignity and respect. Everyone has the right to work in an environment that is free from harassment, sexual harassment, and victimisation.

We operate a zero-tolerance approach to sexual harassment. Any unacceptable behaviour will be taken seriously and addressed promptly.

This policy supports our obligations under the Equality Act 2010, as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025. We are committed to taking all reasonable steps to prevent sexual harassment in the workplace.

Scope

This policy applies to:

- Employees
- Workers
- Agency staff
- Job applicants
- Contractors
- Clients / hirers
- Suppliers

This policy applies to behaviour that takes place:

- In the workplace
- At work-related events
- During external interactions
- Through online or digital communications

Sexual harassment can affect individuals of any gender.

What is Sexual Harassment?

Sexual harassment is unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Examples of sexual harassment may include, but are not limited to:

- sexual comments or jokes
- 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
- intrusive questions about a person's private or sex life or discussing their own sex life
- sexual posts or contact on social media
- spreading sexual rumours about a person
- sending sexually explicit emails or text messages
- unwelcome touching, hugging, massaging or kissing.

Victimisation

Victimisation occurs when someone is treated unfairly or subjected to a detriment because they have done, are believed to have done, or intend to do something protected under discrimination and harassment laws.

Protected acts include:

- Making a complaint or claim under the Equality Act relating to discrimination or harassment
- Supporting another person in making a claim by providing evidence or information
- Alleging that someone has breached the Equality Act

Victimisation will not be tolerated by VGC.

Responsibilities

VGC's Responsibilities

VGC will take all reasonable steps to protect job applicants, work-seekers, temporary agency workers, and employees from harassment.

We will:

- Ensure that our clients/hirers have sexual harassment policies in place and that temporary agency workers are made aware of those policies
- Take reasonable steps to ensure that third parties our staff interact with are aware of our sexual harassment policy
- Provide regular training to staff on sexual harassment and appropriate workplace behaviour
- Carry out due diligence checks on hirers and intermediaries engaged in the supply of temporary agency workers to ensure compliance with duties under the Equality Act 2010
- Investigate all complaints thoroughly and promptly
- Take appropriate disciplinary action where breaches of this policy are identified

Where VGC determines that an employee has committed sexual harassment, disciplinary action will be taken, which may include termination of employment.

Temporary agency workers found responsible for sexual harassment may be subject to VGC's complaint procedure, including where the conduct involves individuals not directly engaged by VGC.

Where a complaint or incident involves a temporary agency worker or work-seeker, VGC will not follow instructions from a hirer, intermediary, or third party where doing so could amount to sexual harassment or victimisation.

Your Responsibilities

All employees, workers, and third parties engaged in the course of work are expected to comply with this policy.

Any breach of this policy may result in disciplinary action where appropriate and/or other sanctions for those engaged as a temporary agency worker or third parties.

Reporting Sexual Harassment

If you believe you have experienced sexual harassment by a colleague or a third party encountered during the course of your work, or have witnessed sexual harassment taking place, you should report the matter immediately by contacting VGC's HR department at hr@vgcgroup.co.uk

Your complaint should include:

- Details of the incident
- The name(s) of the individual(s) involved
- The name(s) of any witnesses

Where appropriate, you may also raise concerns informally with your manager or a senior colleague if you feel comfortable doing so.

All complaints will be investigated promptly and thoroughly.

If it is concluded that harassment has occurred, appropriate action will be taken.

Reports may also be made using the [Whistleblowing - VGC Group](#) form.

Monitoring and Review

VGC will monitor and review this policy regularly and amend it where appropriate. This policy should be read in conjunction with VGC's Anti-Harassment and Bullying Policy, as set out in the VGC Staff Handbook (HR.005.F.013).

Signed

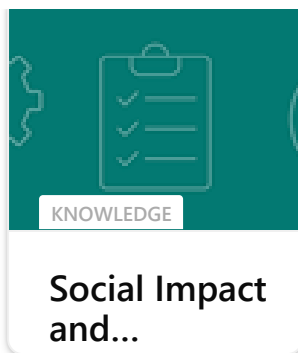
Dated: 26 May 2026

Ciara Pryce
Chief Executive Officer

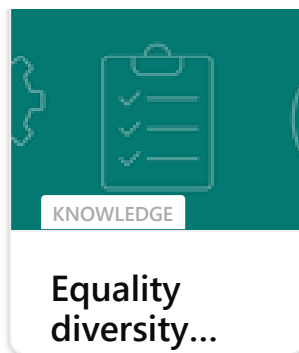
This policy confirms the commitments of all members of the VGC Group.

Related Information





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