

# IPM Sexual Harassment Policy

## Contents

Introduction .....	2
Purpose .....	2
Scope .....	2
Charity Commission Guidance or References Applicable.....	2
Definition of Sexual Harassment .....	3
Process.....	3
Reporting Procedure .....	3
Dealing with the reported harassment.....	3
Supporting People in Speaking Up About Sexual Harassment.....	4
Version Control - Approval and Review.....	6

## Introduction

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, effective from 26 October 2024, the IPM has a duty to take reasonable steps to prevent sexual harassment in the workplace. This includes:

1. Implementing preventive measures and clear communication of this policy
2. Creating a culture of respect and inclusion
3. Taking proactive steps to identify and mitigate risks of sexual harassment

## Purpose

IPM Council acknowledges its duty to prevent sexual harassment in the workplace and to comply with its legal responsibilities. This policy sets out the principles and procedures the IPM will follow.

## Scope

This policy relates to employees of the IPM. The policy may be applied to volunteers, members, affiliated members and third parties if necessary.

## Charity Commission Guidance or References Applicable

Equality and Human Rights – [Workplace Sexual Harassment Guidance](#).

RSM [Final Countdown to New Duty to Prevent Sexual Harassment](#).

Harvard Business Review – [How to speak up when it matters](#).

Acas: [Sexual harassment](#).

Charity Commission E&W – [serious incident reporting](#).

Bates Wells: [Investigations and disclosure of sensitive communications](#) (Jun 24).

RSM: [What to do if you receive a whistleblowing allegation \(2018\)](#)

## **Definition of Sexual Harassment**

Sexual harassment is any unwanted behaviour of a sexual nature that makes someone feel offended, humiliated, or intimidated. It can include, but is not limited to:

- Unwelcome sexual advances
- Inappropriate touching or physical contact
- Sexual jokes or comments
- Displaying sexually explicit materials
- Sending sexually explicit emails or messages

## **Process**

### **Reporting Procedure**

If you experience or witness sexual harassment, you should report it to your line manager. If you do not feel able to do so, report it to the Chair of Council or another senior member of the charity. Reports can be made in person or via email.

All complaints will be taken seriously and handled promptly and sensitively. If proven, IPM will take prompt and effective action. Any employee found to have engaged in sexual harassment may face disciplinary action, which may include dismissal. Volunteers and members may also be subject to appropriate disciplinary actions.

### **Dealing with the reported harassment**

The process will include:

- Acknowledging receipt of the complaint
- Conducting a thorough and impartial investigation
- Keeping all parties informed of the progress
- Ensuring confidentiality as much as possible

Subject to the outcome of an investigation, the IPM may consider a range of formal and, potentially, informal options where both the charity and the person making a complaint think this is appropriate.

### **Informal Action**

For example, this might include:

- Explaining to the person who's been complained about why their behaviour was not acceptable and that it needs to change
- Arranging mediation between the people involved

### **Formal Action**

A formal procedure will be followed either:

- When informal options have not or would not work or be appropriate or
- A formal complaint is made at the outset

### **Disclosure of Sensitive Communications**

The IPM will handle sensitive communications with the utmost care. This includes:

- Maintaining the confidentiality of all parties involved
- Ensuring that any sensitive information disclosed during the investigation is protected
- Following legal guidelines on privilege and disclosure to ensure that sensitive communications are only shared with those who need to know

### **Supporting People in Speaking Up About Sexual Harassment**

The IPM recognises the importance of supporting individuals in speaking up about sexual harassment. We recognise that creating and maintaining an open, respectful culture is key to doing so and, to foster a safe environment for reporting, we will:

- Reduce Psychological Barriers: Acknowledge the difficulty of speaking up and provide reassurance that reports will be taken seriously and handled with sensitivity
- Lessen Social Threats: Make it clear that the intention of reporting is to improve the workplace environment, not to target individuals

- **Provide Clear Reporting Channels:** Ensure that people know how and where to report incidents, and that they can do so without fear of retaliation
- **Offer Support and Resources:** signpost to counselling and support services for those who report harassment. Consider adjustments to working arrangements
- **Encourage a Speak-Up Culture:** Regularly communicate the importance of speaking up and, if reasonably possible, provide training on how to do so effectively.

We also recognise that creating an open and respectful culture is primarily the responsibility of IPM Council. To further ensure a harassment-free workplace, Council will:

- **Include in Policies and Training:** Ensure that our zero tolerance of sexual harassment is properly reflected in other policies and induction
- **Lead by Example:** Demonstrate zero tolerance for sexual harassment through their own behaviour and actions
- **Communicate Clearly:** Communicate the importance of a harassment-free workplace and the steps being taken to ensure it
- **Report Instances:** Any complaints about sexual harassment will be reported to the Chair and, if appropriate, other reporting action taken, such as to regulators.

### Version Control - Approval and Review

Version no.	Approved by	Date	Main changes	Review
Draft		12 March 2025	New Policy	3 years