

Policy



Sexual Harassment

URN: J-P-124

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Host Force:	Dorset Police
Host Policy Unit:	Dorset Police Legitimacy Team
Policy Owner:	Alliance Head of Employee Relations
Policy Author:	Strategy & Policy Lead (ER)

Associated Procedure(s):	J-Pr-196 Sexual Harassment in the Workplace Procedural Guidance
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Applicable to:

Devon & Cornwall Police	☒
Dorset Police	☒
OPCC Devon & Cornwall	☐
OPCC Dorset	☒
Officers	☒
Staff	☒

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1.0 Introduction

- 1.1 The Force has a duty to take reasonable steps to prevent sexual harassment, including third party harassment of their officers and staff, in the workplace. Please note: third parties include but are not limited to customers, clients, contractors, and service users. The Force is committed to providing an inclusive and welcoming working environment for all police officers, student police officers, police staff, members of the Special Constabulary, agency workers, volunteers, workers, and contractors, free of sexual harassment and victimisation and where everyone can feel supported, safe and able to reach their potential.
- 1.2 The Force has a zero-tolerance policy in relation to sexual harassment.
- 1.3 Sexual harassment is unlawful under the Equality Act 2010.
- 1.4 The aim of this policy is to:
- advise what constitutes sexual harassment,
 - make clear the professional behaviour expected of all officers, staff, volunteers, contractors, workers, and prospective job applicants,
 - empower individuals to raise a complaint by setting out a clear process,
 - support those who are affected by sexual harassment,
 - make clear the responsibility on the Force, and managers, to prevent and tackle sexual harassment in the workplace,
 - make clear the expectation and responsibility of all individuals to be an upstander, challenging sexual harassment if observed or otherwise believed to be happening in the workplace, and
 - ensure individuals are aware of the support available in the Force.

2.0 Scope

- 2.1 This policy will apply to police officers, student police officers, police staff (employees), members of the Special Constabulary, agency workers, volunteers, workers, and contractors. It also applies to those on secondment (subject to the terms of the secondment) and those within the scope of the Strategic Alliance and other regional initiatives when based in either force.
- 2.2 Reference to 'the Force' is a collective term for Devon & Cornwall Police, Dorset Police and their respective Office of the Police and Crime Commissioner (OPCC). Each operate as separate legal entities.

3.0 Definitions

- 3.1 Sexual harassment - occurs when a person engages in unwanted conduct of a sexual nature that has the purpose or effect of:
- violating someone's dignity, whether intended or not,
 - creating an intimidating, hostile, degrading, humiliating, or offensive environment for them, whether intended or not.
- 3.2 Victimisation – occurs when a person is treated poorly or unfairly because they have made a complaint related to a protected characteristic or when a person has helped someone else who has raised a complaint and are seen to be siding with that person and as a result are then treated badly.

4.0 Responsibilities

- 4.1 Everyone has a responsibility to create and maintain a work environment that is free of harassment and victimisation and to treat colleagues with dignity and respect.
- 4.2 Individuals are responsible for:
- being aware of how their behaviour may affect others,
 - treating colleagues with dignity and respect,
 - taking a stand where inappropriate jokes, comments or gestures are being made,
 - making it clear to others when their behaviour is unacceptable,
 - intervening to stop sexual harassment and discreditable conduct and giving support to anyone who may have been harassed,
 - reporting harassment to a manager or seeking advice from HR Operations - Delivery. Alternatively, reports can be made confidentially to the Professional Standards Department (PSD) or anonymously, via Confide in Us (see SharePoint Homepage),
 - co-operating as required in any investigations, and
 - not prejudging or victimising the complainant or alleged harasser if a complaint of harassment is made.

Please note: the expectation is for individuals not to ignore and / or walk away from such incidents or behaviour but to challenge when appropriate and always report it. Any refusal to get involved is not acceptable and will be seen as enabling discreditable (potentially criminal) behaviour and may even be seen as collusion when allowing it to continue within the policing culture.

4.3 Managers have a responsibility to:

- implement the zero-tolerance policy on sexual harassment,
- set a good example by modelling the required standards of professional behaviour in their own behaviour,
- ensure that there is a proactive and supportive working environment which enables the early reporting of such behaviour,
- make sure that officers / employees know the standards of behaviour that are expected of them,
- make sure that officers / employees under their management complete and understand mandatory training,
- take a pre-emptive approach to prevent sexual harassment, including by third parties, by identifying potential risks and addressing these appropriately,
- provide opportunities for open dialogue in which individuals / teams can raise any concerns,
- intervene to stop bullying or harassment,
- take seriously and report promptly to their line manager, PSD, or seek advice from HR Operations - Delivery any complaint of harassment, or any incident of harassment that they witness, or is reported to them, (maintaining confidentiality, subject to any exceptional circumstances, e.g., a criminal offence, health and safety, etc., and ensure that appropriate steps are actioned, and
- where known, provide appropriate support to the person who has experienced, or is affected by, the harassment.

4.4 Where the line manager is the perpetrator, the second line manager or PSD should be approached, or advice sought from HR Operations – Delivery.

4.5 The Force has a responsibility to ensure that sexual harassment will not be tolerated in the workplace, that complaints will be taken seriously, will be dealt with quickly, will be treated as serious disciplinary offences and may be considered as gross misconduct.

4.6 The Force will:

- assess the risk of sexual harassment occurring during service / employment,
- identify preventative actions that could mitigate these risks,
- evaluate which actions are reasonable to implement and action accordingly,

- assess the potential risks posed by third-party interactions and take reasonable steps to protect officers / employees.

4.7 To achieve this the Force will endeavour to:

- conduct risk assessments. This involves identifying high-risk areas, such as lone working environments or roles with high interaction with third parties and reviewing any existing preventative measures. (Regular updates to the risk assessment are crucial as workplace dynamics change),
- foster a positive, inclusive workplace culture that promotes respect and a zero tolerance against harassment through visibility of support from senior leadership, and regular communication of this policy,
- continue to ensure effective reporting and complaint mechanisms are available, enabling individuals to feel safe and supported where reporting harassment,
- support and encourage the anonymous reporting tools, (set at Section 8.0 'Clear Reporting Process') to empower more individuals to come forward, knowing their concerns will be treated with confidentiality,
- provide regular tailored training to support the prevention of sexual harassment,
- regularly monitor and evaluate the effectiveness of these prevention measures.

5.0 Sexual Harassment

5.1 Sexual harassment can occur regardless of the individual's or alleged perpetrator's sex, sexual orientation or trans status.

5.2 The Force recognises, however, that women are significantly more likely to experience sexual harassment than men and that there is a gender equality issue in relation to sexual harassment. If sexualised behaviour and sexual objectification of women is perceived to be tolerated in the workplace, it is more likely that sexual harassment will occur.

5.3 The Force recognises that there is also an issue of intersecting protected characteristics in relation to sexual harassment, and that there may be additional concerns for ethnically diverse officers, employees and others as outlined in Section 2.0 'Scope', LGBTQ+, disabled and younger workers where the harassment may be bound up with other forms of discrimination.

5.4 Sexual harassment in the workplace may be perpetrated by anyone, for example:

- a work colleague,

- a manager, supervisor, or someone else in a position of authority, or
- a member of the public / visitor / contractor.

5.5 Sexual harassment includes a wide range of behaviours including but 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,
- uninvited discussion of one's sex life or inappropriate discussion of sex life,
- sexual posts or contact on social media,
- spreading sexual rumours about a person,
- sending sexually explicit emails, instant messaging, or text messages in or out of work,
- unwelcome touching, hugging, massaging, or kissing,
- invasion of personal space,
- predatory behaviour - any conduct evidencing habitual or continuing attempts to misuse power, authority, position, or situation to abuse or exploit others, as well as deliberate attempts to entrap or entice others to commit sexual misconduct,
- criminal behaviour - including sexual assault, stalking, grooming, indecent exposure and sending offensive communications, or
- coercion – unwanted sexual activity that occurs when a person is pressured, tricked, threatened, or forced in a non-physical way.

5.6 Sexual harassment is usually directed at an individual or minority group, but this is not always the case. Sexual harassment may be perpetrated by one individual, a pair, a small group, a large group, or may permeate through a whole section of the Force.

5.7 Sometimes there can be a culture of sexual harassment in a workplace that is not specifically aimed at one person, such as leering at members of the public or sharing sexual images, e.g., via social media. Someone could still make a complaint of sexual harassment in this situation. Further information on inappropriate use of social media platforms can be found in 'Social Media and Instant Messaging Groups' Policy. See Section 14.0, 'Supporting Links and Guidance'.

5.8 An individual can experience sexual harassment from someone of the same or different sex and the recipient of the behaviour decides whether the approach was unacceptable or undignified.

5.9 Sexual harassment can be a one-off event and does not need to be directed at a person. It can be witnessed or overheard. Sexual conduct that has been

welcomed or tolerated in the past may, over time, become unwanted and if it continues becomes harassment.

- 5.10 Forces will be liable for sexual harassment committed by their officers, employees or volunteers during their service / employment / volunteering unless they can show that they took reasonable steps to prevent the harassment. 'In the course of service / employment / volunteering' includes acts committed in any other place where work is conducted such as offsite, at a training course, conference, or external meeting, as well as other circumstances in which the officer / employee / volunteer is not actually working but it is related to work, such as at a leaving party or other social event.

6.0 Taking Action

- 6.1 The Force seeks to provide a professional working environment for its officers, staff and volunteers and has a duty of care to do so.
- 6.2 The Force will ensure reasonable action is taken to prevent sexual harassment in the workplace and ensure support is available for anyone who feels they have had their dignity violated or where an individual(s) has created an intimidating, hostile, degrading, humiliating or offensive environment, whether intended or not.
- 6.3 Reasonable action includes:
- setting standards and a culture where such behaviour is not tolerated,
 - leading by example and upholding Force values,
 - providing opportunities for teams to discuss sexual harassment and the importance of tackling unlawful and discriminatory practices,
 - ensuring there is a clear reporting process in place,
 - ensuring accusations are fully investigated and appropriate action taken, and
 - ensuring support is available to individuals affected by sexual harassment.

7.0 Setting Standards

- 7.1 Standards of professional behaviours are set by The Police (Conduct) Regulations 2020, the Police Staff Council Joint Circular 54 and are cognisant of the Code of Ethics.
- 7.2 This policy is adopted in line with the Standards of Professional Behaviour , which sets out the principles and standards of behaviour expected from police professionals. It applies to every individual who works in policing or for the police as indicated in Section 2.0 'Scope'.
- 7.3 For the purpose of this policy, the following standards are highlighted:
- individuals are expected to act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy,

- individuals must not abuse their powers or authority and must respect the rights of all individuals, and
 - all individuals are to challenge and report improper conduct.
- 7.4 Everyone has the right to a working environment that feels safe and free of harassment from others within the service and members of the public. The Force will proactively support such a working environment.
- 7.5 A breach of such standards could damage public confidence in the police service.
- 7.6 Any breach of any of the standards could potentially lead to disciplinary action, which in serious cases may result in dismissal without notice (summary dismissal).

8.0 Clear Reporting Process

- 8.1 Reports of sexual harassment can be raised via various mechanisms, which include, via a manager, HR Operations – Delivery, trade unions or staff associations (as applicable). Alternatively, reports can be made confidentially to the Professional Standards Department (PSD) or anonymously, via Confide in Us. Please see Sexual Harassment in the Workplace Procedure (J-Pr-192) for further details.
- 8.2 Individuals in the Force are encouraged to come forward if they believe they have been harassed or become aware of sexual harassment between a colleague or other individual. Sexual harassment can also give rise to situations where there is coercive or predatory behaviour. If intimate relationships arise between colleagues and any person has concerns about any predatory or coercive element to such relationship, they are encouraged to report this. The Force has robust procedures in place designed to promptly take action. See Section 4.0 'Responsibilities'.
- 8.3 Wherever possible, the Force will seek to ensure the individual and alleged harasser are not required to work together whilst the complaint is under investigation. This should not be seen as a punitive measure, and a decision-making process will be undertaken to identify who will be moved where required.
- 8.4 Investigations into complaints or allegations of sexual harassment may also lead to a criminal investigation being instigated.
- 8.5 Confidentiality will be maintained where reports of sexual harassment are made, subject to where a criminal offence may have been committed or where maintaining confidentiality would pose a risk to the person making the report, or to others.
- 8.6 Where a criminal act is suspected, any action taken must avoid prejudicing the criminal investigation. Appropriate action will be taken depending on the circumstances Please see Police (Conduct) Regulations 2012 (Officers) / Misconduct Policy (J-P-116) (employees).

9.0 Misconduct Process

- 9.1 Where the individual is included within the scope of this policy, any required investigation will be handled fairly through the appropriate process.
- 9.2 All complaints of sexual harassment will be taken very seriously. Any investigation will be dealt with in a fair and sensitive manner regardless of whether they are:
- the person who made the complaint,
 - someone who witnessed it, or
 - someone who has been accused of sexual harassment.
- 9.3 An individual who sexually harasses someone at work will be held responsible for their actions; where an individual in the Force faces an investigation into their conduct at work, this could result in disciplinary action up to and including summary dismissal. In addition, they could be held personally liable to pay compensation in legal claims.

10.0 Training

- 10.1 Training and information is crucial to the success of policies on sexual harassment and in changing the workplace environment and there is an expectation that individuals complete and understand any learning and development training that they are required to undertake. Please refer to the Learning & Development department for further information.

11.0 Support and Advice for Individuals

- 11.1 Support and / or advice is available for individuals from a variety of sources such as, line managers; HR Operations; Staff Associations and Trade Union representatives; Employee Assistance Programme; Equality, Diversity & Inclusion (EDI) teams; Health and Wellbeing Team; Peer Supporters or the Survivors Network (DP). Further links to support are detailed within Section 14.0, 'Supporting Links and Guidance' of J-Pr-192 Sexual Harassment in the Workplace Procedural Guidance.

12.0 Legal Basis / Regulatory Background / Standards

The Force is obliged to abide by all relevant legislation and other guidance as appropriate:

- The Police (Conduct) Regulations 2020
- The Police (Conduct, Performance and Complaints and Misconduct) (Amendment) Regulations 2025
- Code of Ethics (DCP)
- Code of Ethics (DP)

- Equality Act (2010) including the Public Sector Equality Duty
- Freedom of Information Act 2000 (FOIA)
- Human Rights Act (1998)
- Records Management (DCP)
- Records Management (DP)
- The Health and Safety at Work Act (1974)
- UK General Data Protection Regulation / Data Protection Act (2018)
- Our Purpose (DCP)
- Vision, Purpose & Priorities (DP)
- Standards of Professional Behaviour
- Worker Protection (Amendment of Equality Act 2010) Act 2023

13.0 Monitoring, Review, Enquiries and Feedback

Review and amendments will be coordinated by the Policy Unit.

The Alliance Head of Employee Relations is responsible for overseeing this policy to ensure a consistent Force approach is maintained. Monitoring will be primarily carried out subject to Force processes of continuing review and in line with Force governance requirements.

This policy will be reviewed every two years subject to legislation / process changes.

Please note: Where legislation / guidance changes have occurred / scheduled to occur or operational needs demand it, ahead of the revised review date, Alliance People policies and associated procedures / step by steps will be applied in line with prevailing legislation / guidance.

For day-to-day enquiries relating to this policy please contact HR Operations (D&C) - Admin or .HR Ops Dorset - Admin

We welcome any comments or suggestions you wish to share about the content or implementation of this policy. If you would like to make contact to discuss further, please email: .Policies@dorset.PNN.police.uk

14.0 Supporting Links and Guidance

A range of policies, procedural guidance and step by steps are also available in support of this policy available via the following links:

Policy and Procedure

- J-P-116 Police Staff Misconduct Policy
- J-Pr-154 Police Staff Misconduct Procedural Step by Step
- J-P-178 Grievance Policy
- J-P-016 Protected Disclosure (Whistleblowing) and Support to People Reporting / Witnessing Suspected Wrongdoing

- Social Media and Instant Messaging Groups

SharePoint

- Government Security Classification (GSC)
- People - Help and Support
- People Portfolio A-Z
- Video Link to Knowing the Line

College of Policing

- National Decision Model
- Authorised Professional Practice

Other

- ACAS Sexual Harassment Guide

15.0 Version History

Version:	1.0
Date:	03/05/2023
Reason for Amendments:	Initial document
Amended by:	Employee Relations
Approved by:	Board
Date Approved:	26/04/2023
Quality Assured:	Legitimacy Team

Version:	1.1
Date:	18/07/2023
Reason for Amendments:	Minor amendments. Reference to 'Bad Apple (D&C) / Confide in Us (Dorset)' has now been amended to read just 'Confide in Us'. Updated to latest template.
Amended by:	Employee Relations / Legitimacy Team
Approved by:	Legitimacy Manager
Date Approved:	17/07/2023
Quality Assured:	Legitimacy Team

Version:	1.2
Date:	10/06/2024
Reason for Amendments:	Fit for Purpose Review. The revised document reflects applicable resultant amends, which include: the duty on the Force to take reasonable steps to prevent sexual harassment in the workplace,

(as per the Worker Protection (amendment of Equality Act 2010) Act 2023). An expansion to the details pertaining to the responsibility to create and maintain a work environment free of harassment and victimisation. That the Force will ensure appropriate reporting mechanisms are in place. Other minor amends have been made to add clarity and improve grammar, structure, and formatting.

Amended by: Employee Relations
Approved by: HoD
Date Approved: 08/05/2024
Quality Assured: Legitimacy Team

Version: 1.3
Date: 21/11/2024
Reason for Amendments: Revised to reflect the Worker Protection (Amendment of Equality Act 2010) Act 2023.
Amended by: Employee Relations
Approved by: HoD
Date Approved: 18/11/2024
Quality Assured: Legitimacy Team

Version: 1.4
Date: 06/01/2025
Reason for Amendments: Reviewed and amended following the publication of the revised NPCC policy template. Additional and amended sections include 4.6, 4.7, 8.1, 8.2, 8.4, 8.5, 8.6.
Amended by: Employee Relations
Approved by: n/a
Date Approved: n/a
Quality Assured: Legitimacy Team

Version: 1.5
Date: 09/06/2025
Reason for Amendments: Fit for purpose review completed resulting in amendments.
Amended by: Employee Relations
Approved by: 05/06/2025
Date Approved: Strategy and Policy Lead.
Quality Assured: Legitimacy Team

16.0 Governance

The details below are only required for new documents, major amendments subject to consultation

Present Portfolio Holder:	Head of People (HR Operations)
Present Document Owner:	Alliance Head of Employee Relations
Present Owning Department:	Alliance People Portfolio
Name of Board:	Strategic People Board
Chief Officer Approving:	ACO (D&C) and ACO People, Director of People and Support Services (Dorset)
Date Approved:	26/04/2023
