

Anti-Sexual Harassment Policy

(version 10/1/25)

1. Background

Sexual harassment is unlawful under the Equality Act 2010 and since October 2024 there has also been a legal obligation for employers to take reasonable steps to prevent sexual harassment in the workplace. This is distinct from other types of harassment based on characteristics such as race, disability or age etc.

This legislation therefore requires the Club to take reasonable steps to prevent sexual harassment to members and employees of any gender, identity or sexual orientation by any person including other members and employees, contractors, visitors and any other persons on Club premises or during Club activities away from the premises.

The Club is committed to ensuring that sexual harassment does not occur to any person on Club premises or during Club activities away from the premises, whether an employee or not, and this anti-sexual harassment policy therefore applies to all.

The Club policies on bullying, victimisation, racism, discrimination, improper conduct and other types of harassment are covered in other Club policy documents which are available online. These include, without limitation, the Articles of Association, Club Regulations, Safeguarding Policy, Diversity & Inclusion Policy, Staff Handbook, Employment Contract, Self-employment Service Agreement, Whistleblowing Policy, Guidelines for Complaints & Discipline.

2. Purpose

The purpose of this Anti-Sexual Harassment Policy is to provide and encourage a safe, healthy and respectful environment for all persons who come into contact with the Club, its employees and members. These include, without limitation, employees, Club members, guests, visitors, contractors, suppliers, pay & play users, course participants, event attendees, visiting teams, facilities hirers and other occasional visitors. This policy aims to prevent sexual harassment in all its forms by outlining expectations of appropriate behaviour and the procedures for reporting and addressing allegations of harassment.

3. Scope

This policy applies to all activities in the Club's grounds, courts and buildings, plus off-site coaching, training and events and all member or staff social gatherings/events.

The Club is aware that some areas or activities may be especially high risk including:

- those where alcohol is being served;
- work related social gatherings;
- travelling for work, competitive events, coaching, training and overnight stays;
- remote and isolated outside areas on the Club site;
- power or senior imbalances between staff/members; and
- home working where inappropriate email, social media or other communication may be more difficult to control.

4. Definition of Sexual Harassment

Sexual harassment is defined as any unwanted, unwelcome, or offensive behaviour of a sexual nature. This can include, but is not limited to:

- Unwelcome sexual advances or propositions;
- Inappropriate touching or physical contact;
- Suggestive looks/stares, gestures, comments or jokes;
- Sharing sexually explicit materials in any form including social media;
- Making or suggesting promises in return for sexual favours;
- Spreading sexual rumours about a person; and
- Any other behaviour that is sexually hostile, intimidating, inappropriate or unwelcome.

5. Policy Statement

The Club is committed to maintaining an environment free from sexual harassment. The Club does not tolerate any form of sexual harassment and takes all such allegations seriously. Engaging in such behaviour may result in disciplinary action, up to and including expulsion from the Club and termination of employment or contract. The anti-harassment actions we may take include:

- Posting clear anti-harassment notices that are easily visible;
- Having clear anti-harassment policies that are consistently enforced;
- Targeted and regular risk assessments that are undertaken to highlight danger factors and decide on actions to be taken to minimise risk;
- Training sessions for staff, as part of the new starter induction process, so that they understand what sexual harassment is and their role in preventing and addressing the problem;
- Open communication culture in the workplace;
- Clear reporting channels for complaints and concerns;
- Clear investigation and disciplinary procedures for handling any incidents; and
- Annual monitoring and review of policies.

6. Reporting Procedures

Any person who believes they have been subjected to any form of sexual harassment is encouraged to report the incident. Employees can report to the Club Manager direct or via their line manager in the first instance. All other incidents can be reported to the Club Manager or to the Board Chair or another Board Director.

If a person witnesses a sexual harassment incident or believes that one has occurred, they are fully entitled to report as above.

If a person wishes to remain completely anonymous, they can write anonymously to the Club Chair, in accordance with the Club Whistleblowing Policy. Obviously in such a case, the identities of all the people involved may not be known. However, the Club will investigate the allegation or issue as far as possible but may not be able to arrive at any conclusions without necessary corroborating evidence.

7. Investigation Process

Once a formal complaint is made, the investigation will be conducted by a duly appointed Club Officer. The complainant will be kept regularly informed of progress of the investigation and any resolution. At all times throughout the investigation, the alleged offender and/or complainant may, if required by them, have legal or other counsel as their representative at any meeting or by way of assistance. Upon receiving a report of sexual harassment, the following process will be followed:

- A designated Club Officer will conduct a thorough and impartial investigation;
- All parties involved will be treated with respect and confidentiality will be maintained as far as reasonably possible;
- A disciplinary hearing may be required before a small group of Club Officers;
- The designated Club Officer will document the findings and recommend appropriate actions to the HR Committee, with escalation to the Club Board for more serious matters; and
- An appeal may be made and heard by a separate group of Club Officers.

8. Disciplinary Action

If allegations of sexual harassment are substantiated, the Club will take appropriate disciplinary action, which may include one or more of the following:

- Verbal or written warning as to future conduct;
- Formal written apology to/from any relevant parties, as appropriate;
- Mandatory training or counselling;
- Suspension from Club activities;
- Temporary or permanent expulsion from the Club;
- Suspension or termination of Club membership; and
- Suspension or termination of Club employment or service contract.

The reporting, investigation and disciplinary actions above follow the Club's Guidelines for Complaints & Discipline.

9. Protection against Retaliation

Retaliation against any person who reports sexual harassment or participates in an investigation is unacceptable to the Club and will be treated as a fundamental violation of this policy. Any such actions will be subject to the procedures and sanctions outlined in this policy. The Club reserves the right to report serious complaints to external authorities including the relevant national sports bodies and/or to the police.

All information collected as part of any sexual harassment incident will be subject to the Club Data Privacy Policy. This ensures that personal information and data is retained in a secure confidential store and is only kept for as long as necessary for its purpose.

10. Policy Review

This policy will be reviewed annually and updated as necessary to ensure it remains effective, and compliant with relevant laws and best practices.

For questions or concerns regarding this policy, please contact the Club Manager.