SEXUAL HARASSMENT POLICY

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US Sexual Harassment Policy

Introduction

At the United Synagogue, our Jewish values call on us to treat every person with dignity, compassion and respect. We are committed to providing a safe, inclusive and supportive working environment where sexual harassment, harassment, bullying and victimisation are not tolerated in any form.

We take this responsibility seriously and want to lead by example. Although the law is expected to strengthen from 30 October 2026, the United Synagogue's approach is to work towards that higher standard now. We will seek to take all reasonable steps to prevent sexual harassment at work, including harassment connected with work-related events and harassment by third parties.

Our approach is rooted in the principle of *kavod habriyot* — the dignity of every human being — and the teaching in Pirkei Avot 4:3: "Despise no one and disdain nothing, for there is no one who does not have their hour and there is nothing that does not have its place."

"Despise no one and disdain nothing, for there is no one who does not have his hour and there is nothing that does not have its place."

This policy should be read alongside the Staff Handbook and other relevant policies, including the Code of Conduct, Dignity at Work Policy, Equality & Diversity Policy, Grievance Policy, Disciplinary Policy, Safeguarding policies, Whistleblowing Policy and Data Protection Policy.

Purpose

The purpose of this policy is to explain what sexual harassment is, how we seek to prevent it, how concerns can be raised, and how we will respond. It is intended to help everyone understand their rights and responsibilities and to make clear that the United Synagogue will take all concerns seriously, sensitively and fairly, while taking a proactive and values-led approach that reflects the enhanced legal standards expected from October 2026.

Scope

This policy addresses sexual harassment and any other form of harassment, bullying or victimisation in the following contexts:

- anywhere on the organisation's premises.
- anywhere away from the organisation's premises, during work-related social events, business events, or business trips in the UK or abroad.
- anywhere away from United Synagogue premises, where an incident involves two or more individuals, where all parties are directly employed by, or involved with, the United Synagogue in some capacity, i.e. Trustees, donors, volunteers, contractors, suppliers, service users etc., and at least one of the parties is directly employed by the United Synagogue.

This policy applies to employees, contractors, apprentices, consultants, officers, interns, volunteers, job applicants, temporary, agency and casual workers, Trustees, agents, speakers, programme facilitators, donors, security agencies, and any other person, representatives, or bodies, involved with the organisation. If you are an employee, this policy does not form part of your contract of

employment, but you are required to comply with it as a condition of your employment. We reserve the right to amend it at any time. If any substantial amendments are made, you will be notified in writing.

Statement of Principles

The United Synagogue will take proactive steps to prevent sexual harassment in accordance with the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023, and the enhanced duties effective from 30 October 2026. We will not wait for incidents to occur before acting. We will assess risk, plan preventative measures, record the steps we take, respond promptly to concerns and review whether our approach is effective.

From 30 October 2026, employers are expected to be required to take *all* reasonable steps to prevent sexual harassment and to ensure that employees are protected from harassment by third parties. The United Synagogue wishes to be ahead of this change and will use this higher standard as the benchmark for its culture, policies, training, risk assessments and day-to-day management practice.

This means that prevention is not limited to having a policy in place. It includes practical, visible and ongoing action, such as identifying higher-risk situations, supporting safe reporting, training staff and managers (mandatory training on sexual harassment must be completed annually, via US Learn), addressing inappropriate behaviour early, taking account of power imbalances, and making clear to third parties that harassment will not be tolerated.

Everyone has a role in maintaining a respectful workplace. Those in positions of leadership, authority or influence must model the highest standards and must never misuse their position, status or power. Any allegation of sexual harassment, bullying, victimisation or related misconduct will be handled seriously, fairly and with care for everyone involved.

The United Synagogue recognises that sexual harassment can be male on female, female on male, male on male or female on female. Equally, those individuals who do not identify with the above genders can be victims or perpetrators of sexual harassment.

Bullying, Harassment, Victimisation and Discrimination

To understand this policy, it is important to understand the related concepts of bullying, harassment, victimisation and discrimination. These behaviours can cause real harm and are inconsistent with our values and our legal responsibilities.

Bullying

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power, through means intended to undermine, humiliate, denigrate, or injure the recipient physically, or psychologically.

Physical, verbal, and non-verbal conduct can all amount to bullying. It can take various forms, from extreme behaviour involving violence and intimidation, through to subtle actions such as deliberate exclusion.

Bullying usually occurs over a period and is usually more than a single incident.

Harassment

For the purposes of this policy, harassment is unwanted conduct, affecting the dignity of employees in the workplace. It may be related to age, disability, gender reassignment, marriage & civil

partnership, pregnancy & maternity, race, religion or belief, sex and sexual orientation, or any other protected characteristic, as defined in the Equality Act 2010. It is important to note that actions or comments are harassment, when viewed as demeaning and unacceptable to the recipient, or an

observer. Harassment is typically persistent and continues to develop over a period. However, an isolated incident can constitute harassment.

Examples of harassment can include name-calling, lewd comments, excluding colleagues, making insensitive jokes, or displaying pornographic material. Physical, verbal, and non-verbal conduct can all amount to harassment, including things said or done to third parties or online, including on social media. These must all be linked to one of the protected characteristics noted above, to constitute harassment.

Harassment is often targeted at a particular individual, however, a prevailing workplace culture where, for example, the telling of sexist jokes or homophobic comments is tolerated, can also constitute harassment.

Bullying or harassment may be by an individual against an individual, (perhaps by someone in a position of authority, such as a manager or supervisor), or involve groups of people. It may be obvious, or it may be insidious. Whatever form it takes, it is unwarranted and unwelcome by the individual, or a group of people at whom it is aimed.

Victimisation

Victimisation is the act of subjecting an individual to a detriment, or treating them badly, because they have done something the perpetrator did not like. For example, they in good faith complained (formally or informally) that someone was bullying/harassing them, or someone else. Victimisation can also occur to an individual, when they opt to support someone who has made a complaint, or they give evidence in relation to a complaint. An example would be a manager imposing an unreasonably heavy workload, on an individual who is giving evidence in a disciplinary hearing against them.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment, and behaviour may be harassment even if the person responsible did not intend to cause offence.

It is important to note that sexual harassment is different to sex-based harassment. While sexual harassment relates to unwanted conduct of a sexual nature, sex-based harassment is behaviour that is linked in some way to gender and causes offence to an individual, or a group of individuals. For example, where an employee is constantly telling derogatory or demeaning jokes about women, and a particular individual, (regardless of gender), finds this unwelcome and offensive.

One single incident can amount to sexual harassment. It is important to note that a person's behaviour may be perceived as sexual harassment, regardless of whether the individual intended to offend. There are differences in what people deem as acceptable behaviour and everyone has the right to decide what behaviour they consider acceptable.

However, conduct or behaviour which any reasonable person would likely be offended by, will always constitute harassment, without the need for the affected individual having to state that it was unacceptable, for example, sexual assault. Other forms of conduct may not always be so obvious, such as office banter and jokes. Office banter of a sexual nature is never acceptable. In these cases, the behaviour will constitute sexual harassment, especially if the conduct continues after the employee has made it clear, by words or by their conduct, that such behaviour is

These are serious contraventions and should not be seen as harmless. As an employer, the United Synagogue has a duty to prevent sexual harassment and therefore adopts a zero-tolerance approach to sexual banter, which may include but is not limited to informal or casual comments of a sexual or provocative nature, innuendo, teasing remarks and false flattery.

Sexual harassment is about how our actions and/or words are perceived by others and how they make them feel. Many would not consider behaviour like flirting or sexual comments to be sexual harassment, thinking they are too innocent to be labelled in that way. However, if something makes an employee or their colleagues uncomfortable, or makes the employee feel unsafe, then it is sexual harassment and is inappropriate, unacceptable and will not be tolerated. Sexual harassment is not limited to verbal or physical actions, it can also occur through social media platforms, email, or text. Examples of sexual harassment in the workplace include, but are not limited to, when someone:

- Insinuates, proposes, or demands sexual favours of any kind.
- Inappropriate touching (e.g. placing hand on lower back, knee, breasts, attempts to kiss).
- Invades another person's personal space.
- Stalks, intimidates, coerces, or threatens another person, to get them to engage in sexual acts, this can be online or physically.
- Makes written or verbal comments of a sexual nature, such as remarks about an employee's appearance, questions about their sex life, offensive jokes, or requesting inappropriate levels of intimacy.
- Sends or displays sexually explicit objects, pictures, photos, posters, or messages.
- Comments on someone's looks, dress, sexuality, or gender, in a derogatory or objectifying manner, or a manner that makes them uncomfortable.
- Makes obscene comments, jokes, or gestures, that humiliate or offend someone.
- Stares at another person, or at a part of their body.
- Spreads sexual rumours about another person.
- Pursues or flirts with another person persistently, without the other person's willing participation. Flirting with someone at an inappropriate time (e.g. in a team meeting) is considered sexual harassment, even when these advances would have been welcome in a different setting. This is because such actions can harm a person's professional reputation and expose them to further harassment.
- Indecent exposure.
- Sexually assaults another person.

Cases of sexual harassment may be treated as a criminal matter as well as an employment matter, depending on the circumstances. If a complaint is reported to police, or criminal court proceedings are being pursued, we will still investigate the complaint fully, and it will be dealt with accordingly.

Right to Report

Anyone who experiences or witnesses sexual harassment is encouraged to report it. We know this may feel difficult or upsetting, and we will treat concerns with sensitivity, confidentiality where possible, and respect. No one will be penalised or victimised for raising a concern in good faith or for supporting someone else who does so.

In addition to complaints about the behaviour of staff, individuals have the right to complain if they believe they have been sexually harassed by a third party, for example donors, contractors, volunteers, clients, suppliers, service users, or any other person who comes into contact with anyone employed by the United Synagogue during the course of their employment.

We understand this may be difficult, but employees are encouraged to report all incidents of sexual harassment, knowing they will be supported throughout our processes. The United Synagogue recognises that there may be perceived or actual status disparities in the workplace. However, the United Synagogue will not tolerate any individual using their position to sexually harass another person.

All individuals have a responsibility and are encouraged to report any incidents of sexual harassment that they experience or witness, so that the United Synagogue can investigate and take appropriate action. Each complaint will be taken seriously, and the individual will be supported and will not be penalised or victimised in any way. Reports of sexual harassment may also attract whistleblowing protection, and any person raising a concern in good faith must not be subjected to detriment for doing so.

The United Synagogue expects concerns to be shared as early as possible so that support can be offered and risks can be addressed. However, we recognise that people may need time before they feel able to speak up. Delayed reporting will not, in itself, prevent a concern from being taken seriously.

Reporting sexual harassment will help the person who has experienced it, and hold the person perpetrating it, responsible for their actions. Left unreported, those individuals that are harassing others, can fall into a pattern of repeated and accepted behaviour, causing the overall workplace atmosphere to degenerate.

Making a Complaint

Employees may raise concerns under the Grievance Policy, or speak to their Line Manager, HR, a senior manager, or another appropriate person if they do not feel able to use their usual management route. Volunteers and other stakeholders should report concerns to HR, Safeguarding or another appropriate senior contact, depending on the nature of the concern. If the concern relates to the Chief Executive, it should be referred to the President.

We may need to take action even where a person does not wish to make a formal complaint, particularly where there is a safeguarding concern, a risk to others, or a legal duty to act. Wherever possible, we will discuss this with the person affected first, listen to their views, and explain the steps we propose to take.

In some cases, a criminal offence may have been committed and the employee may need to report the matter to the police. If needed, the Human Resources department can arrange for someone to accompany an employee when making a complaint to the police in such circumstances. The United Synagogue will continue to conduct its own separate investigation, even if the police are involved; however, it is likely that any internal investigation would not commence until after the police have concluded the matter.

It is imperative that any reports of sexual harassment are made promptly, so that if required, they can be investigated quickly. The longer the delay in reporting such matters, the greater the risk that allegations may not be able to be corroborated, either due to lack of evidence, or witnesses.

Dealing with Complaints

Confidentiality will be maintained as far as possible during the investigation process, to the extent that this is practical and appropriate in the circumstances. However, the United Synagogue must be able to determine the scope of the investigation and the individuals who should be informed of, or interviewed about, the allegation(s). For example, the identity of the complainant and the nature of the allegations must be shared with the alleged perpetrator so that they are able to respond fairly.

The United Synagogue will appoint a suitable person to investigate. They may be internal or external to the United Synagogue and will have had suitable training to conduct an objective investigation.

Depending on the circumstances, the decision may be made to suspend the alleged perpetrator. It is important to note, that a decision to invoke such measures will not be taken lightly and does not imply guilt. It is simply a safeguarding measure for all parties involved, including the alleged perpetrator, whilst the investigation is being conducted.

Once the investigation has been completed, the individual will be informed in writing of the outcome and the United Synagogue's conclusions and decision as soon as possible.

If an employee's grievance is upheld and the harasser remains employed by the United Synagogue, the United Synagogue will take reasonable steps to ensure that the person affected does not have to continue working alongside the perpetrator(s) if they do not wish to do so. However, this may not be possible in all circumstances. The United Synagogue will discuss the options with the individuals involved.

If an employee's grievance is not upheld, arrangements will be made for the complainant and the accused, to continue or resume working together and to repair working relationships.
It is important to note that an individual will not be penalised if their complaint is not upheld.

However, allegations that are found to be deliberately false or malicious in nature will be considered a disciplinary offence and will be dealt with in accordance with the United Synagogue's Disciplinary Policy.

Management Responsibility

Senior leaders, managers and HR have a particular responsibility to prevent and respond to sexual harassment. They must take all reasonable steps within their role to identify and reduce risks, take concerns seriously, act promptly, report matters appropriately, protect confidentiality as far as possible, and ensure that those affected are treated with dignity and compassion.

Failure by a manager, senior leader or HR colleague to take appropriate action when they become aware of sexual harassment may itself be treated as a disciplinary matter.

Managers should consider risks in their teams and working arrangements, including lone working, work-related travel, social events, contact with members, volunteers, donors, suppliers or other third parties, alcohol-related events, and situations involving significant power imbalance. Where risks are identified, managers must work with HR to put proportionate preventative measures in place.

Those investigating must do so thoroughly and objectively, whilst always maintaining confidentiality to the maximum extent possible. Normally investigations will only require disclosure on a limited, need to know basis. The importance of confidentiality must be stressed to witnesses, when conducting the investigation. Senior Management, Line Managers and HR, should be responsive, sensitive, and supportive towards any employee who raises a complaint, and be mindful of any unconscious bias that may affect their judgement.

Furthermore, HR and all managers, have a duty to always promote and foster an environment that is safe, collaborative, and mutually respectful.

Personal Accusations

If someone approaches an employee on an informal basis, about their conduct or behaviour, they

should not disregard what has been said. There are occasions where actions or comments are not intended to offend, but harassment is about how they are perceived by the recipient or others. An

employee may have offended someone without intending to, and if that is the case, a sincere apology from them, together with an assurance that they will be more mindful in the future, may resolve the issue.

If a formal complaint is made against an employee, the matter will be thoroughly investigated in line with this policy. The United Synagogue will follow its disciplinary procedure, and the accused employee will have the rights set out in that procedure. They will have the right to be informed of the allegations against them, to respond to those allegations, and to be accompanied to meetings by a trade union official or fellow worker.

Wherever possible, the United Synagogue will try to ensure that the accused employee and the complainant are not required to work together while the complaint is under investigation. The employee may be suspended during the investigation and, if a disciplinary hearing is to be called, until disciplinary proceedings have been concluded.

Disciplinary Action

Sexual harassment is considered serious misconduct and may be considered gross misconduct, depending on the circumstances. If the complaint is upheld, the United Synagogue may take disciplinary action, up to and including dismissal. If the complaint is upheld but the employee is not dismissed, the United Synagogue could decide to transfer the employee to another post as a reasonable sanction.

If a complaint is made against an employee but is subsequently found not to be in good faith, the United Synagogue will investigate the matter promptly and appropriate sanctions will be issued. The United Synagogue considers making false accusations of sexual harassment a disciplinary offence, and the individual concerned could be subject to disciplinary action, up to and including dismissal.

Victimisation is a serious offence, and if an employee is found to have victimised any individual involved in a complaint, either against them or another employee, they will be liable to disciplinary sanction, up to and including dismissal.

If the complaint against an employee is not upheld, but there is no evidence to suggest it was done in bad faith, arrangements will be made for the employee and the complainant to continue or resume working, and to repair working relationships.

An employee may bring an employment tribunal claim, or criminal proceedings, against any individual. Where the individual has not followed our procedures or has acted against the advice of the HR department, the individual will be personally liable for any costs, or compensation awarded, as a result of these processes.

Third-party Harassment

Third-party harassment means harassment by someone who is not employed by the United Synagogue but who comes into contact with our employees, workers, volunteers or representatives in connection with work. This may include members, service users, donors, suppliers, contractors, visitors, volunteers, trustees, honorary officers or members of the public.

Third parties include, but are not limited to:

- service users.
- clients
- donors
- volunteers

- honorary officers

- trustees
- suppliers
- members
- people in the same building as us

The United Synagogue will take all reasonable steps to protect staff and others from harassment by third parties and will not tolerate our staff harassing third parties. Where a concern is raised, we will consider what action is appropriate, which may include changing arrangements, restricting contact, ending services or contracts, refusing donations, asking a third party's organisation to act, or involving the police where appropriate.

Where appropriate, the United Synagogue will make its expectations clear to third parties before concerns arise, including through communications, contracts, event arrangements, induction, site rules, community guidance or other suitable measures. We will also consider whether particular roles, locations or events require additional safeguards.

Equally, we will not tolerate our staff sexually harassing any third party.

If any sexual harassment, by, or towards third parties, is experienced or witnessed, those concerned, have an obligation to report it, in line with the procedures set out herein. The complaint will be fully investigated, and the outcome will be communicated to the employee or third party, who raised the complaint.

If a complaint is against a third party and it is upheld, we are unable to follow our internal disciplinary policy. As a result, other sanctions will be used, as appropriate. This may include:

- withdrawing our services
- refusing donations from perpetrators
- informing volunteers their services are no longer required.
- requiring a trustee or honorary officer to stand down.
- changing suppliers or requiring a different person from the company to provide the service.
- requesting that the perpetrators' employer, commence a disciplinary process, for breach of employment legislation.

Depending on the circumstances, individuals will be encouraged and supported, to report sexual harassment, sexual abuse, or sexual violence, to the police.

Education

We will provide appropriate, regular and recorded training and communication so that employees, managers and others understand what sexual harassment is, how to prevent it, how to challenge inappropriate behaviour safely, and how to report concerns. Training and guidance will be reviewed periodically and updated where needed, including to reflect the enhanced legal duties expected from October 2026.

Senior Management and all Line Managers are responsible for promoting respect, safety and dignity at work. The United Synagogue will ensure that appropriate measures are put in place, such as training, supervision and instruction, to enable Senior Management and Line Managers to identify work-related sexual harassment and deal effectively and promptly with any incidents or complaints they receive.

Preventing Sexual Harassment

Preventing sexual harassment is a shared responsibility and a core part of how we live our values. The United Synagogue will assess risks, listen to feedback, learn from concerns and promote a culture where respect, safety and dignity are actively protected. Employees can help by:

- Making sure they treat everyone they meet with dignity and respect.

- Being aware of their own behaviour and actions and remembering that these have consequences. Remember that 'office banter' and jokes, may not be received in the same manner they were intended.
- Making a stand against inappropriate workplace banter. Custom and practice, does not mean that some jokes and behaviour are acceptable.
- Making it clear to others where possible when the employee finds their behaviour unacceptable.
- If they feel safe to do so, challenging inappropriate behaviour; and in all cases reporting concerns to their Line Manager, HR or another appropriate senior contact.

Ensuring Effectiveness

We will regularly review the effectiveness of this policy and the preventative measures taken under it. This will include reviewing risk assessments, training records, reporting routes, complaints, outcomes, lessons learned, third-party risks and any wider cultural issues. The aim is to demonstrate that the United Synagogue is taking all reasonable steps to prevent harassment and is continuously improving its approach.

We may also use anonymous surveys, one-to-one discussions, exit interviews, supervision, audits and other feedback routes to understand whether people feel safe and respected at work and whether further action is needed.

Additional Support

A comprehensive list of additional support resources available to individuals, is set out in Appendix 1.

Data Protection

When handling concerns, investigations, reviews or monitoring under this policy, we will process personal data lawfully, fairly and securely, in line with UK data protection legislation and our Data Protection Policy. Information will be shared only where there is a legitimate need to do so.

Review

This policy will be reviewed periodically and updated as needed to reflect changes in employment legislation, statutory guidance, best practice and organisational learning. It will also be reviewed in advance of, and following, the October 2026 legislative changes so that the United Synagogue continues to meet and, where possible, exceed the standard expected of employers.

Appendix 1 – Helplines and Support Resources

Criminal matters should be reported to the police.

Call 999 if you or someone else is in immediate danger, or if the crime is in progress.

Call 101 to contact the police if the crime is Not an emergency.

Jewish Women's Aid (JWA) Confidential Free phone Helpline: 0808 801 0500

Monday – Thursday: 9.30am – 9.30 pm

Outside these hours you may leave a voicemail.

For women and girls over the age of 16. It provides support and information on options, rights and services for survivors, professionals and supportive friends and family.

JWA's Web Chat - www.jwa.org.uk/webchat

Monday and Wednesday: 3pm – 5pm, Tuesday and Thursday: 10am – 12pm

The webchat service provides free confidential advice and emotional support for women and girls.

Rights of Women Sexual Harassment at Work Advice Line: 0207 4900152

Monday: 3pm-5pm and 6pm- 8pm, Tuesday: 6pm- 8pm, Wednesday: 6pm – 8pm

Free employment legal advice to women in England and Wales experiencing sexual harassment at work including:

- Identifying sexual harassment
- How to bring a complaint against your employer
- Advice about grievances and investigations
- The Employment Tribunal procedure
- Settlement Agreements and Non-Disclosure Agreements

London Survivors Gateway: 0808 801 0860

Monday: 9am- 5pm Tuesday: 9am- 7pm Wednesday: 9.30am- 3.30pm Thursday: 9am – 7pm Friday 9am- 3pm

Open to everyone aged 13 or above regardless of sex, sexual orientation, gender reassignment, disability, language, ethnicity, or immigration status. Provides information on what help is available in London for those who have experienced any form of sexual violence. The Gateway is a partnership between the four London Rape Crisis Centres, Galop (the LGBT+ anti-violence charity), SurvivorsUK and the Havens and is run by the Women and Girls Network.

Safeline - The National Male Survivors Helpline and Online Support Service: 0808 800 5005

Male Survivor SMS Text Service – text 07860 065187 (texts are charged at your standard rate).

Male Survivor Email Service – email support@safeline.org.uk. Can email anytime and aim to reply within 7 working days.

Male survivor Web Chat - https://safeline.org.uk/contact/

Monday – Friday: 9am – 8pm, Saturday and Sunday: 10am – 2pm

A dedicated service for men and boys in England and Wales affected by sexual violence and abuse and those that support them.

Samaritans: 116 123

24hrs

Providing emotional support to anyone in emotional distress, struggling to cope, or at risk of suicide throughout the United Kingdom and Ireland.

Employee Assistance Programme for free counselling (24h) – 0800 030 5182 (Username – United Password – Synagogue)
