Third-Party Sexual Harassment Prevention Policy

Introduction

The United Synagogue is committed to promoting a safe and respectful work environment, protecting employees from third-party sexual harassment and taking proactive steps to prevent sexual harassment in all areas of our work, in line with UK legal standards.

Purpose

This document explains what third-party sexual harassment is, gives practical examples, sets out preventative expectations and clarifies how employees and managers should report and respond to concerns.

Scope

Third-party sexual harassment occurs when an employee is subjected to unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature by someone who is not a direct employee of the United Synagogue. Third parties may include volunteers, visitors, congregants, event attendees, guest speakers, service users, suppliers, members, clients, customers, vendors or contractors.

Legal Framework

Under the Worker Protection (Amendment of Equality Act 2010) Act 2023, the United Synagogue has a proactive legal duty to take reasonable steps to prevent sexual harassment of its employees, including harassment by third parties. Failure to meet this duty can have serious legal, financial and reputational implications for individuals, shuls and the Charity.

Associated Policies

- United Synagogue Sexual Harassment Policy
- Dignity at Work Policy
- Health and Safety Policy and risk assessments
- United Synagogue Code of Conduct
- Grievance Procedure
- Safeguarding procedures and reporting arrangements

Statement of Principle

The United Synagogue has a zero-tolerance approach to sexual harassment, including third-party sexual harassment. We will identify risks, implement preventative measures, provide mandatory training, respond appropriately to concerns and regularly review whether our measures remain effective.

Examples of Third-Party Sexual Harassment

- **Inappropriate comments or jokes:** a vendor makes sexually suggestive comments during a business meeting, or a bakery employee makes degrading comments when an employee inspects the premises.
- **Unwanted physical contact:** a customer repeatedly touches an employee inappropriately despite being asked to stop, or a parent deliberately touches a nursery employee when collecting a child.
- **Sexual advances:** a shul member persistently asks an employee out on dates or makes unwelcome advances, or a factory worker asks an employee whether they are single and requests to meet after work.
- **Displaying or sending offensive material:** a contractor displays sexually explicit material, or a third party sends explicit material through WhatsApp or another platform.
- **Threats or intimidation:** a delivery driver threatens negative consequences if an employee does not comply with sexual requests, or a third party uses threatening or intimidating behaviour.

Managers' Responsibilities

- Promote a respectful working environment and lead by example.
- Take all concerns or allegations seriously and respond promptly.
- Escalate concerns to HR and/or the Safeguarding Team where necessary.
- Support employees who raise concerns and ensure they feel safe and listened to.
- Identify potential risks and help implement proportionate measures to reduce them.

Safeguarding Considerations

Some reports may raise safeguarding concerns instead of, or in addition to, workplace harassment. This includes conduct involving a child, young person or adult at risk; a third party in a position of trust; regulated activity; or an imbalance of power creating wider risk. The Designated Safeguarding Lead should be contacted promptly alongside, or where appropriate instead of, the standard HR route. Safeguarding assessment and any necessary referral should not wait for the workplace process to conclude. Safeguarding-relevant concerns should be recorded through the organisation's safeguarding case-management arrangements so that patterns and wider risks can be identified.

Prevention and Communication

- Promote the Sexual Harassment Policy and clearly define third-party sexual harassment.
- Provide regular training and raise awareness of available support.
- Complete risk assessments that include third-party risks.
- Adjust working environments or schedules where appropriate, particularly for lone or shift workers.

- Communicate expected standards through notices, event information, supplier or contractor documents, booking terms, site rules and direct communication.
- Use proportionate controls to restrict contact, change arrangements or end a supplier or business relationship where necessary.

Reporting Third-Party Sexual Harassment

Incidents should be reported promptly through a line manager, the HR team, the United Synagogue Safeguarding Team, the Grievance Procedure or another designated reporting route. Reports will be treated seriously and handled as sensitively and confidentially as possible. Employees who raise concerns will be protected from retaliation. Appropriate action may include investigation, restricting contact or access, changing working arrangements, ending a supplier or business relationship, and considering safeguarding, Disclosure and Barring Service, local authority or police referrals where required. Confidential support may be available through the Employee Assistance Programme and other appropriate services.

If You Witness Sexual Harassment

- Challenge inappropriate behaviour where it is safe and appropriate to do so.
- Support any colleague who may have been affected.
- Report concerns through the appropriate channels.
- Seek advice from HR or the Safeguarding Team if you are unsure whether a situation should be reported.

Monitoring and Review

The United Synagogue will regularly review its approach to preventing sexual harassment, including harassment by third parties. Information from risk assessments, training, reported concerns and employee feedback will be used to identify emerging risks and ensure preventative measures remain effective and appropriate. This document will be reviewed every two years, or earlier following a significant incident, organisational change or relevant change in law or guidance.

Appendix 1 – Further Resources and Support

- Sexual Harassment Policy
- Understanding sexual harassment training on US Learn
- US Health and Safety Policy
- Dignity at Work Policy
- Health and safety risk assessments
- EAP resources including counselling
- Community Think Tank
- External websites and support charities