



PREVENTION OF SEXUAL HARASSMENT POLICY

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DOCUMENT CONTROL

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1. INTRODUCTION

Invenio is committed to providing a safe and comfortable work atmosphere for all its employees (defined herein below) and anyone directly in business with Invenio. The Company is dedicated to providing a working environment that is free of harassment and bullying, and where everyone is treated and treats others, with dignity and respect. The Company will not permit or condone any form of bullying or harassment.

2. SCOPE

This policy applies to all employees of the Company. It also includes, but not limited to, trainees, consultants, contractors and vendors. As well as office premises, this policy is also applicable during travel to and from the office; client locations; events organised by the Company both onsite and offsite.

This policy considers sexual harassment occurring 'in the course of employment. It covers sexual harassment occurring within the workplace but is also covers sexual harassment occurring at a work-related event such as conferences or leaving drinks and acknowledges that Invenio should seek to prevent third-party sexual harassment.

3. PURPOSE & OBJECTIVE

We are committed to conducting and governing ourselves with ethics, transparency and accountability and to this, we have developed structures, practices and procedures that ensure that ethical conduct at all levels is promoted across the company. In acknowledgement of these values, we are dedicated to ensuring a work environment which is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all employees and business partners. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations in any capacity, such as customers, vendors etc.

Discrimination and harassment of any type is strictly prohibited. We promote and maintain this culture to ensure that employees and business partners do not engage in practices that are abusive in any form or manner whatsoever. Invenio operates a zero-tolerance policy for any form of sexual harassment in the workplace; and will ensure that all incidents and investigations are treated seriously and promptly investigated.

4. HARASSMENT

Harassment is a discriminatory act, and employees can be personally liable for harassment claims. The protected characteristics relevant to harassment are age, disability, gender reassignment, race, religion or belief, sex and sexual orientation.

Harassment is very difficult to define as it can take many forms, but in the main it is unwanted behaviour related to a relevant protected characteristic towards others, which has the purpose or effect of violating the victim's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment (a hostile environment') for them. It could also be that the victim doesn't have the relevant protected characteristic, but witnessing harassing behaviour has still created a hostile environment for them.

Obvious examples are:

- Making derogatory comments or jokes based on race, gender, religion, or other protected characteristics.
- Consistently using the wrong names and pronouns following a gender identity transition.
- Mimicking or making fun of someone's disability.
- Marginalizing someone because they are of a particular race.
- Derogatory comments about someone's clothing related to a protected characteristic, for example religious clothing.

5. WHAT IS SEXUAL HARASSMENT?

Sexual harassment is unwanted attention that violates a person's dignity or creates an offensive or degrading environment. Sexual harassment makes the person, or persons, affected feel uncomfortable, threatened or offended. It is the effect that matters regardless of whether it was an intentional or unintentional act.

A range of behaviours recognised to be forms of sexual harassment are listed below. However, this list is not exhaustive. It is important to bear in mind that sexual harassment covers a very broad spectrum of behaviour, and may not always appear to be overtly sexual in nature, but can include:

- sexual comments or jokes, which may be referred to as "banter";
- sexual images displayed or shared;
- suggestive looks or staring;
- offensive words or comments;
- demeaning or humiliating behaviour or language;
- references to someone's body;
- intrusive questions about someone's private life;
- stalking, including online stalking;
- sexual gestures, such as simulating sexual acts;
- unwanted touching, such as putting hand on someone's knee or hugging them;
- unwanted sexual attention whether verbal or physical;
- coercing someone into sexual relations through pressure, manipulation or threats, or offering rewards in exchange for sex;
- sexual violence, including rape, or threatening to carry out sexual violence or unwanted sexual acts;
- Cyber harassment - repeated and deliberate online behaviours that aim to threaten, scare, shame, or silence the targeted individual.

Sexual harassment is considered a disciplinary offence and may lead to dismissal, and, in some cases may also be a criminal offence.

Although, statistically, women are more likely to experience or report sexual harassment, it can happen to anyone. Sexual harassment does not always occur in plain sight. It can happen in-person and online, and outside of as well as during working hours. It does not need to occur in person. It can occur via digital means, including social media sites or channels (e.g. WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour. Regardless of when and how it occurs, Invenio will consider any sexual harassment involving employees as a workplace issue and will take action in line with our disciplinary policy.

6. VICTIMISATION

Victimisation refers to treating someone unfairly or subjecting them to harm or disadvantage because they have:

1. Made a complaint about inappropriate or unlawful behaviour, such as harassment or discrimination.
2. Participated in an investigation, hearing, or legal proceeding related to a workplace complaint.
3. Supported another employee in raising a concern or making a complaint.

Examples of victimisation include:

- Excluding an individual from workplace activities or decision-making.
- Spreading false rumours or creating a hostile work environment.
- Assigning unfavourable tasks or unfair performance evaluations.
- Threatening retaliation, such as demotion or dismissal.
- Failure to consider someone for a promotion because they have previously made a sexual harassment complaint.
- Dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint.

Invenio will not tolerate victimisation under any circumstances. Acts of victimisation may result in disciplinary action, up to and including termination of employment.

7. COMMITMENT

The company is committed to deliver regular training sessions for all employees so that you have a comprehensive understanding of what sexual harassment is and your role in preventing and addressing it.

We will also ensure that additional training, education and guidance is given to the Leadership Team and all managers to give them the confidence to tackle sexual harassment.

We recognise the need for regular risk assessments and audits to identify and mitigate risks of sexual harassment. We will actively consider the risks of sexual harassment occurring and devise and implement reasonable steps we can actively take to reduce those risks and proactively prevent sexual harassment.

We will follow a clear, fair and supportive procedure to encourage the reporting of potential or alleged sexual harassment in the course of employment which is described below.

8. LEADING BY EXAMPLE

Senior leaders and managers foster a culture built on mutual respect where all employees feel safe to share their views and raise concerns. Invenio expects leaders and managers to act as role models by consistently demonstrating respectful and inclusive behaviour. This includes being aware of how their own status and actions may impact on others.

In addition to self-awareness the company expects and encourages leaders and managers to regularly seek and act on feedback from their teams and peers in regard to an inclusive culture actively engaged in preventing sexual harassment.

Preventing sexual harassment requires our leaders and managers to communicate that any form of unfair treatment such as sexual harassment will not be tolerated. Offensive behaviour can sometimes be excused as banter or jokes, so leaders and managers must maintain high standards, even when they may face criticism for doing so.

Appropriate training, education and guidance to leadership and managers will be given to ensure they have the confidence and capability to be proactive and deal with unacceptable behaviour at the earliest possible stage, proactively, quickly, effectively and impartially.

9. THE ROLE AND RESPONSIBILITIES OF THE EQUALITY, DIVERSITY AND INCLUSIVITY COMMITTEE (EDI COMMITTEE)

An Equality, Diversity and Inclusivity (EDI) Committee are responsible for actively promoting a diverse, supporting and inclusive employment culture. The Committee will consist of the following guidelines for members to be nominated by the management:

- A presiding officer who will be a woman employee at a senior level (EDI Champion) responsible for actively promoting a diverse, supporting and inclusive employment culture. In case a senior female employee is not available, the presiding officer will be nominated from any other location.
- An important role of the EDI Committee will be an undertaking to be a dedicated point of contact for employees who have concerns about sexual harassment, and they will ensure that such matters are correctly reported, investigated and resolved.
- Not less than two women members, from amongst employees.
- The members, HR representatives and reporting managers will be provided necessary training inputs to handle such issues effectively and with the required sensitivity and concern.
- The EDI Champion must maintain a complaint register and shall provide a quarterly report to the HR Head. The EDI Champion must refrain from divulging the details of any complaint(s) or any other Company confidential information gathered in the course of an inquiry, or the identities of the persons involved in the case, unless required under applicable laws.

Management will nominate members to become valued contributors to our EDI Committee. All EDI members will be appropriately trained and supported to understand and embrace their role in enabling a preventative mindset in regard to sexual harassment in the course of everyone's employment.

In situations wherein the aggrieved individual has a complaint against any of the EDI Committee, the aggrieved individual may approach the presiding officer directly; or if the complaint is against the presiding officer, the aggrieved individual may approach the HR Head. However, in case the presiding officer and the HR Head are the same person, the aggrieved individual may reach out to the CEO.

10. HOW WE CAN ALL HELP PREVENT SEXUAL HARASSMENT

We all have a shared responsibility to help create and maintain an environment free of sexual harassment. You can do this by:

- Considering how your own behaviour may affect others and amending it accordingly.
- Being receptive, rather than defensive, if asked to modify your behaviour.

- Treating your colleagues with dignity and respect.
- Taking a stand if you think inappropriate comments, jokes or behaviour is occurring.
- Making it clear to others if you find their behaviour unacceptable.
- Intervening if possible, to stop sexual harassment and giving support to others;
- Reporting sexual harassment or potential sexual harassment in the appropriate manner to either your manager, one of our EDI Champions or a member of the HR Team.

11. WHAT TO DO IF YOU ARE CONCERNED ABOUT SEXUAL HARASSMENT

The following process can be followed by any employee. You can follow this process if you feel you are experiencing sexual harassment, or if you witness sexual harassment, or have a concern that another colleague may be experiencing sexual harassment.

All allegations of sexual harassment will be treated with the upmost seriousness and confidential. We will follow a fair and equitable process to ensure all concerns are investigated thoroughly to allow us to resolve matters promptly whilst ensuring all parties are treated sensitively and in a confidential manner.

Informal approach

You may be able to sort matters out informally. The person may not know that their behaviour is unwelcome or upsetting, so an informal discussion may help them to understand the effects of their behaviour and agree to change it.

If you feel able to, tell the person what behaviour you find offensive and unwelcome and say that you would like it to stop immediately. You are encouraged to keep a note of the date and what was said and done. This will be useful if the unacceptable behaviour continues, and you wish to raise the matter formally.

If this is too difficult for you, please speak to your manager, a member of our EDI Committee or a member of the HR team for advice and assistance. They may, with your agreement, speak to the person concerned on your behalf or accompany you when you speak to the other person.

If the informal approach is not appropriate, or has not been successful, you should raise the matter formally through our grievance procedure.

Formal procedure

When any employee feels that they need to deal with an issue of sexual harassment formally, you should make a formal complaint in accordance with our grievance policy.

Your written complaint should set out full details of the conduct in question, including the name of the harasser, the nature of the sexual harassment, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

If you wish to make a formal complaint about victimisation, you should submit it in writing to your manager or HR.

We will investigate all complaints of this nature in a timely, confidential and sensitive manner. The investigation will be conducted by someone with appropriate seniority, training and experience and with no prior involvement in the complaint. Details of the investigation and the names of any persons involved will only be disclosed on a 'need to know' basis. We will consider whether any steps are necessary to manage the ongoing employment relationship between all parties involved.

If the report does not come directly from the person being harassed, the nominated investigator will confidentially speak to the person affected and ideally encourage them to report. In cases where individuals are reluctant to report despite encouragement, the investigating manager needs to respect the wishes of the person making the complaint as far as possible.

Once the investigation is complete, all parties will be informed separately of the decision. Whether or not a complaint is upheld, we will consider how best to manage any ongoing working relationships between all parties. As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

If the manager considers that there is a case to answer and the harasser is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. Our investigation into your complaint may be put on hold pending the outcome of the Disciplinary Procedure. Where the disciplinary outcome is that sexual harassment occurred, prompt action will be taken to address it. If the harasser is a third party, such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem.

If someone makes a complaint which is not upheld, and we have good grounds for believing that the complaint was not made in good faith, we may take disciplinary action against the person who made a false complaint.

Supporting the investigation

All reports of sexual harassment will be believed and protecting the person who raised the complaint or who is the recipient of sexual harassment will be paramount. Alongside this, the alleged harasser will also be treated fairly in line with procedure and the law.

In some cases, more immediate action may need to be taken, such as suspending or moving the alleged harasser. A member of the HR Team or one of our EDI Committee will be able to advise investigating managers on the appropriate course of action. Care must be taken to ensure no action is taken that could be perceived as punishing any person who raises a complaint.

In our commitment to prevent sexual harassment, we will fully analyse any unaddressed risks which were not recognised and could have reasonably prevented any incident of sexual harassment and put in place any reasonable measures to prevent a recurrence of a similar nature.

12. WITNESSING SEXUAL HARASSMENT

Employees who witness sexual harassment or victimisation are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:

- Intervening where you feel able to do so.
- Supporting the victim to report it or reporting it on their behalf.
- Reporting the incident where you feel there may be a continuing risk if you do not report it.
- Co-operating in any investigation into the incident.
- All witnesses will be provided with appropriate support and will be protected from victimisation

13. SUPPORT

Invenio understands that reporting sexual harassment takes courage and can be extremely stressful. We will ensure that any individuals raising a concern or complaint are given reassurance and support throughout the process. This support will also be extended to any employee who has witnessed sexual harassment.

As well as providing opportunities to talk, our EDI Committee and HR team are trained to signpost employees to relevant services such as occupational health or counselling if appropriate.

Invenio educates leaders and managers to be vigilant for signs of victimisation whereby an employee is treated less favourably because they have reported sexual harassment and will take appropriate action through our disciplinary policy if required.

14. BREACH OF POLICY

If after due investigation, we consider that an incident of sexual harassment has occurred, the matter will be dealt with under the disciplinary procedure as a case of possible misconduct or gross misconduct. The person concerned may be suspended on full pay during the investigation until any eventual disciplinary proceedings have been concluded. If the complaint is upheld, a disciplinary sanction may be imposed up to and including dismissal, depending on all relevant circumstances.

Incidents of sexual harassment may constitute a criminal offence, and we may suggest that the matter is reported to the police.

15. SENSITIVITY AND CONFIDENTIALITY

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties. If you are found to have breached confidentiality or acted without due care or sensitivity in a case of bullying, harassment or victimisation, we may take disciplinary action against you under the Company's disciplinary procedure, up to and including dismissal.

In all cases we will need to consider the duty of confidentiality that we owe to all employees, for example there will be restrictions on sharing information about the actions taken against the alleged harasser with the complainant.

16. THIRD PARTY HARASSMENT

Third-party sexual harassment occurs when an employee is subjected to sexual harassment by someone who is not part of the company, but who is encountered in connection with work. This includes our customers, suppliers, members of the public, friends and family of colleagues, delegates at a conference, and self-employed contractors.

Third-party sexual harassment is unlawful and will not be tolerated. The law requires employers to take steps to prevent sexual harassment by third parties and we are committed to doing so.

To prevent third-party sexual harassment from occurring, we will:

- attach signage to the walls of the areas within the office where customers are present to warn that sexual harassment is not acceptable
- inform third parties (i.e. suppliers) of our zero-tolerance sexual harassment policy within our supplier documentation.

If you have been subjected to third-party sexual harassment, you are encouraged to report this as soon as possible. Alternatively, you can report instances of third-party sexual harassment by emailing HR.

We will not tolerate sexual harassment by any employee against a third party. Instances of sexual harassment of this kind may lead to disciplinary action, including termination of employment.

17. REVIEW

This policy will be reviewed at regular intervals or as needed to ensure compliance with regulations and best practice. The Company reserves the right to amend or update this policy at any time to reflect changes in legislation, organisational practices or workplace needs. Employees will be notified of any changes, and all amendments will be communicated and made accessible via SharePoint.