Company Name:	Wolviston Management Services Ltd ("the Company")
Policy Name:	Sexual Harassment Policy
Date:	October 2026

OUR POLICY

Wolviston Management Services Ltd (WMS) is committed to ensuring that all its employees and temporary agency workers are treated with dignity and respect and treat others in the same way. We believe that all employees and temporary agency workers have the right to work in an environment which is free from any form of harassment, including sexual harassment.

WMS has a zero-tolerance approach to sexual harassment.

WMS is committed to ensuring that reasonable steps are taken to prevent sexual harassment to all employees and temporary agency workers. This policy will be reviewed and updated from time to time to ensure WMS's compliance with its duties under the Equality Act 2010 as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025 to ensure that all reasonable steps are taken to prevent sexual harassment.

Harassment

Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual, including conduct of a sexual nature.

Sexual Harassment

In accordance with the Equality Act 2010, WMS is committed to providing a work environment free from unlawful sexual harassment.

1.1 Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or the effect of:

1.1.1 violating the victim's dignity; or

1.1.2 creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.

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1.2 An individual of any gender may be the victim of sexual harassment.

1.3 Whilst not an exhaustive list, forms of sexual harassment can include:

1.3.1 Slurs or unwanted sexual advances;

1.3.2 Visual conduct such as derogatory or sexually oriented posters;

1.3.3 Physical conduct such as assault, unwanted touching, or any interference because of sex, race, or any other protected characteristic basis;

1.3.4 Threats and demands to submit sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours;

1.3.5 Sexual comments or jokes;

1.3.6 Unwelcome touching, hugging, massaging, or kissing.

1.4 If an individual believes that they have been sexually harassed by a colleague or third party not employed by WMS they have come into contact with in the course of their work, they should make an immediate report to Vicky O'Toole, Operations Manager, or Samantha Anderson, CEO followed by a written complaint as soon as possible after the incident. The details of the complaint should include:

1.4.1 Details of the incident

1.4.2 Name(s) of the individual(s) involved.

1.4.3 Name(s) of any witness(es)

1.5 WMS will undertake a thorough investigation of the allegations. If it is concluded that harassment has occurred, remedial action will be taken.

1.6 Where an incident/complaint of sexual harassment relates to a temporary agency worker WMS will not carry out instructions from a hirer/and/or intermediary/and/or third party which it considers will amount to sexual harassment and victimisation.

1.7 WMS will take all reasonable steps to safeguard job applicants, temporary agency workers it supplies and internal members of staff from harassment.

1.8 WMS will ensure that hirers have a sexual harassment policy in place, and temporary agency workers are made aware of them.

1.9 WMS will ensure that all internal staff are given training on sexual harassment, and this is monitored and regular training will be provided.

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1.10 WMS will carry out due diligence checks on hirers/intermediaries who we engage in the supply of temporary agency workers to ensure that they are taking reasonable steps to carry out their duties as employers under the Equality 2010.

2 All WMS employees, temporary agency workers and third parties they engage with in the course of their work will be expected to comply with WMS's policy on sexual harassment in the workplace. Any breach of such a policy will lead to appropriate disciplinary action and/or other sanction in the case of third parties.

3 Employees and temporary agency workers who WMS finds to be responsible for sexual harassment will be subject to disciplinary procedures and the sanction may include termination.

4 Temporary agency workers who WMS finds to be responsible for sexual harassment will be subject to WMS's complaints procedure even where such sexual harassment involves individuals who are not engaged by WMS.

Complaints and monitoring process

WMS has procedures for monitoring compliance with this policy and for dealing with complaints of sexual harassment in place. These are available from Vicky O'Toole and will be made available immediately upon request. Any discrimination complaint will be investigated fully.

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