

Prevention of Sexual Harassment Policy

1. Purpose

At Smartbox, we are dedicated to maintaining a safe, respectful, and ethical workplace, and we have zero tolerance for any form of sexual harassment.

The purpose of this policy is to outline the definitions of sexual harassment, roles and responsibilities and how to report any incidents of sexual harassment. It also sets out the steps that the Company will take to deal with any team member complaints of sexual harassment, including by third parties, and what support is available for any team member affected by sexual harassment.

Smartbox Assistive Technology intends to provide a positive working environment and a culture that is diverse, equitable and inclusive. No one should feel threatened or intimidated, and everyone should be treated with dignity and respect. All team members are required to uphold, promote and apply this policy.

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent, and trusted. Our policies and procedures relating to Sexual Harassment are in line with our culture and values.

This policy also applies to work social events and social media posts and interactions on social media between colleagues, which will still be classed as 'work situations'.

2. Scope

All Smartbox Assistive Technology Ltd (UK) team members are covered by this policy.

3. What is Sexual Harassment?

Sexual harassment is unlawful under the Worker Protection (Amendment of Equality Act 2010) Act that came into effect on 26th October 2024. This Act places a legal duty on employers to take reasonable steps to prevent sexual harassment in the workplace proactively. It is also unlawful to treat someone less favourably because they have either submitted a complaint of sexual harassment or have rejected such behaviour. The Act defines sexual harassment as unwanted conduct of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Sexual harassment can be intentional or unintentional, but the key characteristic of sexual harassment is that the behaviour is unwanted by the recipient. Sexual harassment may be a one-off incident and does not need to be repeated to constitute sexual harassment. Sexual harassment may occur in the office or in other locations, such as at work-related functions, social events, training courses, or conferences. Sexual harassment can be physical, verbal or non-verbal.

The following list gives some examples of behaviour which may constitute sexual harassment, but the list is not exhaustive, and any concern will be investigated on a case-by-case basis:

- Comments or jokes of a sexual nature
- Spreading sexual rumours about a person
- Suggestive looks, staring or leering
- Displaying sexually graphic pictures, posters or photos
- Intrusive questions about a person's private life
- Pressure to go on a date

- Display or circulation of pornographic material
- Email/phone calls/instant messages of a sexual nature
- Inappropriate or unwanted gifts
- Deliberate and unsolicited physical contact including touching, hugging, kissing etc
- Subtle or overt pressure for sexual favours in return for a reward
- Direct propositions of a sexual nature.

Some forms of sexual harassment and sexual abuse or violence may also constitute a criminal act, such as stalking, image-based abuse, indecent exposure, attempted and actual sexual assault and rape. In these cases, team members should be encouraged to contact the police if they wish to do so.

Where it is suspected that a criminal offence may have been committed, the line manager should contact the People Team for advice, who will seek urgent legal advice on handling the case and informing the police.

If the line manager has serious concerns that the person making a complaint or others are at immediate risk of serious harm, they should ask them to call the police. If the person making a complaint is not able to or decides not to do this, the manager can call the police and inform them they have done so. Managers should explain they were fulfilling their duty of care to the person making a complaint and/or others. Again, it is advisable that they contact the People Team to alert them to the situation and seek advice and support.

4. Policy Statement

The purpose of this policy is to ensure that all team members are treated and treat others with dignity, respect, and kindness free from sexual harassment. All team members should take the time to ensure they understand what types of behaviour are unacceptable under this policy. This policy covers sexual harassment which occurs both in and out of the workplace, such as on business trips or at events or work-related social functions. It covers sexual harassment by team members and also by third parties such as customers, suppliers or visitors to our premises.

Team members must treat colleagues and others with integrity, respect and understanding as per our Company values, and should always consider whether their words or conduct could be offensive, intimidating, humiliating or threatening in any way. Even unintentional harassment is unacceptable. We will take allegations of sexual harassment seriously and address them promptly and confidentially where possible. Sexual harassment by a team member will be treated as misconduct under our Disciplinary Procedure. In some cases, it may amount to gross misconduct leading to summary dismissal.

In many cases, a personal relationship between team members will not interfere with work. However, sometimes a personal relationship may cause complications in the workplace as it might adversely impact other colleagues or negatively affect business efficiency. Please refer to our Personal Relationships at Work policy.

Victimisation of any individual making a complaint under this Policy will not be tolerated and will be dealt with under the Disciplinary policy.

5. Responsibilities

People Department

- To provide access to this policy for all team members and provide guidance when requested.
- To provide consistent and fair treatment to all team members.
- To maintain the policy and update it as appropriate to reflect legislative changes, best practice, etc.

Managers

- Demonstrate high standards of behaviour and role model our Smartbox values.
- Be vigilant and aware of any issues and challenge any signs of sexual harassment amongst their team members and colleagues.
- Are responsible for promoting a culture of openness and transparency regarding personal relationships at work.
- Respond promptly to any complaints of sexual harassment.
- Ensure a full investigation is conducted into any complaints raised and take responsibility for seeing the issue through to resolution in a timely manner.
- Maintaining confidentiality where possible.
- Consult with the People Team before dealing with any issues which may arise.
- Deal promptly and sensitively with issues involving sexual harassment.
- Undertake relevant training.

Team Members

- Take responsibility for their behaviour and modify it if necessary.
- Treat all colleagues, customers and any other individuals they come into contact with through the course of their work with dignity and respect.
- Be sensitive to the feelings of others and try to avoid causing offence or upset.
- Challenge any behaviours or actions from others that could be considered sexual harassment.
- Support and come forward for any complaints that they witness.
- Undertake relevant awareness training.

6. Reporting Sexual Harassment

Smartbox Assistive Technology recognises that team members who have been subject to sexual harassment may feel vulnerable and reluctant to raise a concern, or may be unsure how to raise one. They may also worry that their concerns sound trivial and fear the repercussions of doing so, particularly if the concern relates to their line manager or another senior colleague.

Team members should be assured that it is their right to raise matters of sexual harassment and that they will be listened to. They will not be subjected to any negative repercussions by raising a concern when it is raised in good faith and with genuine belief that there is a problem. Any team member who believes that they have been subject to, or may have witnessed sexual harassment, is encouraged to report the issue at the very earliest of stage, ideally at the first instance. Even if the concern is unfounded, a sincere belief in the issue will still be respected. All reports of sexual harassment will be treated seriously, investigated thoroughly, and handled promptly, with sensitivity and the highest degree of confidentiality.

6.1. Informal Resolution

Team members are actively encouraged to try to resolve issues quickly and informally in the first instance. This approach aims to limit the damage caused to all parties and helps to maintain a positive working environment. In some circumstances, the informal route will not be appropriate, for example, if the person concerned has used violence towards the team member. In this instance, the issue should be raised as a formal complaint without delay.

All matters should be addressed as soon as possible. Team members are expected to keep and provide a written record of incidents, recording dates, times, what happened, any witnesses and their feelings at the time. The record can be used to provide specific examples of the behaviour causing concern at this informal stage or it may be used as evidence if the issue should become a formal complaint at a later stage. However, it is recommended that issues are reported or acted upon soon after they occur, as this will mean the incident is

fresh in the mind of all concerned.

6.2 Talking to the person concerned

Many issues can be resolved through informal discussion between the team member and the person to whom the issue is related (the respondent), as this allows problems to be quickly resolved and helps maintain a positive working environment. Informal discussions are particularly effective in cases where the person complained of may not be aware that their behaviour is unwelcome or offensive.

An informal discussion can help build mutual understanding and agreement that the behaviour will stop. Using the 4 F's Framework—Facts, Feelings, Findings, and Future—the team member should calmly share specific examples (Facts), explain how it made them feel (Feelings), reflect on its impact (Findings), and agree on what should change going forward (Future). The person may be unaware their behaviour caused offence. [The Four Fs of Active Reviewing – John Dabell](#)

6.3 Talking to your line manager

Alternatively, the person raising the concern may wish to discuss the matter with their line manager. The line manager may be able to talk to the person on their behalf, facilitate a meeting where the concerns can be raised, or offer advice on how to approach the situation.

7. Formal Complaint

Where the nature of the concern is so serious that informal resolution is not appropriate, or these processes have not succeeded in bringing about the desired changes, a formal complaint should be raised.

7.1 The process for raising a formal complaint

The team member raising the concern should complete the 'Sexual Harassment Report Form' outlining the allegations. They should include the full details, whom the complaint is against, and give details of dates, times and places where issues have occurred, as well as the names of any witnesses. The form should be given to their line manager or if their line manager is the person they wish to raise the concern about, they may speak to another Head of Department or a member of the People Team. The manager to whom the formal complaint is raised will be the Responsible Manager who will oversee the process from this point forward. If the complaint is raised with the People Team, they will appoint a Responsible Manager to assist with the investigation.

The Responsible Manager and a member of the People Team will assess if there is a need for further investigations. In most circumstances, the next step will be to investigate the matter with the team member raising the concern to establish further detailed facts. If the person the complaint is about is not already aware, the Responsible Manager and a member of the People Team will inform them that a complaint has been received. If this is the first time they have been made aware of an issue, they will be advised of the details of the complaint and be invited to a meeting to discuss further.

The Responsible Manager and a member of the People Team will interview the person the complaint is about to establish detailed facts and to question their recollection of events and behaviours. Notes of the meeting will be taken and the person complained of will be asked to sign a set of notes that capture the key points of the discussion. Following this initial stage, the Responsible Manager and People Team member will need to assess the information gathered. If the case thus far suggests that there were witnesses to the issue, they should be interviewed and asked for their recollections of the events. They will also be asked to sign a set of notes that represent the key points discussed at the interview. At the end of the investigation, the Responsible Manager compile a report and discuss this with the People Team to decide on what the next step should be. The Responsible Manager will communicate the findings of the investigation to both the person raising the concern and the person complained of. They will also be advised of what happens next both verbally and in writing.

The Responsible Manager may decide that:

- There is insufficient evidence to progress the complaint further;
- There is some evidence of misconduct but the matter should be dealt with at the informal stage of the disciplinary procedure;
- There is evidence of misconduct and the matter should be dealt with at a formal hearing under the disciplinary procedure. If the decision is taken to proceed to a formal hearing under the Disciplinary Policy, the investigation and report produced under this procedure will become the basis of the management case at the disciplinary hearing without the need for further investigation. For further details, please refer to the Disciplinary Policy.

7.2 Right of appeal by person raising the concern

The person raising the concern will receive feedback on the findings of the investigation, although the full investigation report may not be shared with them for reasons of confidentiality.

If they are unhappy with the findings, they have a right to appeal. The appeal should be addressed to the People Team and made in writing within seven calendar days of receipt of feedback on the outcome of the investigation. The grounds for any such appeal must relate to one of the following:

- The process of the investigation was procedurally flawed
- Their complaint has not been taken sufficiently seriously
- Significant evidence has come to light that is relevant to the case but has not been considered.

The People Team will appoint a suitable manager to review the report and consider whether the process of the investigation was fair and / or whether the conclusions are reasonable. There will be no re-investigation of the complaint, unless the investigation has been found to be fundamentally flawed.

If the decision is taken to move into the disciplinary process to address the actions of the person complained of, that person will, as part of the disciplinary process, have the right of appeal under the Disciplinary Procedure against any formal sanctions arising from the process. The person raising the complaint has no right to appeal the outcome of the disciplinary hearing.

8. What to do if you witness sexual harassment

If you witness sexual harassment, you are encouraged to take appropriate action to address it. You should not take any action that may put you at risk of sexual harassment or other harm. If you feel able, you should intervene to prevent the matter from continuing. If you are not able to do this, your action may include offering support to the victim and encouraging them to report the incident or reporting the incident yourself.

If reporting the incident, you should bring the matter to the attention of your line manager or if they are involved in the incident, a member of the Executive team should be informed in writing. Please use the Sexual Harassment Form to record all details of what you have witnessed including date/time and location.

Your concerns will be handled by a member of the People Team who will sensitively talk to the person subject to sexual harassment to determine how they want the matter to be handled.

9. Third Party Sexual Harassment

Third-party sexual harassment occurs when a team member is subjected to sexual harassment by someone who is not part of the Smartbox family but who is encountered in connection with work. This includes our

customers, suppliers, visitors, delegates at a conference and contractors.

Third-party sexual harassment of our teams is unlawful and will not be tolerated. The law requires employers to take steps to prevent sexual harassment by third parties.

In order to prevent third-party sexual harassment from occurring, we will:

- Have our Prevention of Sexual Harassment Policy visible on our website.
- 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 to your line manager. Please use the Sexual Harassment Report Form to provide as many details as possible. Please see 8.1 'The process for raising a formal complaint'.

Sexual harassment of third parties by any team member will not be tolerated. Such behaviour may result in disciplinary action, up to and including termination of employment.

10. Duty of Care

From time to time, a team member will speak to a colleague, their line manager or a member of the People Team regarding sexual harassment. They often just want to talk the matter through with someone and seek advice.

The team member may request that no further action be taken and this will be respected wherever possible. However, Smartbox Assistive Technology has a duty of care to all team members. If the issues raised are sufficiently serious, the team member's request for confidentiality may be overridden by Smartbox Assistive Technology's duty of care to all team members. For example, if issues are raised that affect the health (mental or physical), safety or well-being of team members these will need to be addressed. Team members will be told if this applies when they raise the issue. Care will be taken to address these issues without reference to the team member who raised the concern.

11. Training

We provide training to all team members on sexual harassment to ensure there is a clear understanding of, amongst other things:

- what sexual harassment is and how it may occur
- scenarios of sexual harassment
- that sexual harassment will not be tolerated
- how team members can report any incidents of having been sexually harassed or having witnessed it

We ensure that all levels of management are trained on implementing this policy, including preventing and managing sexual harassment in the workplace and the procedure to follow if an allegation is reported.

We provide refresher training as appropriate.

12. Additional Support

12.1 Support For Managers

- In most cases, a team member will report concerns and complaints to their line manager but there are often reasons why a team member would feel more comfortable raising a complaint

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with a manager in a different department.

- Always take the matter seriously, be prepared to listen and handle the situation with care and sensitivity. It is important that you do not ask any leading questions or in any way interrogate the person making the complaint about what occurred. You must remain impartial and should not undermine or reinforce what is being discussed with you.
- Ensure the conversation takes place in a private space, think about your tone of voice and body language during the conversation. It is important you reassure them they will be kept updated with any action you take as you handle the case. You should also assure them that all information is confidential, with the exception of the People Team if you need to seek advice and if a separate Responsible Manager is appointed to investigate the case.
- Ask the team member making the complaint if they have kept a record of events and if not encourage them to if they feel they are able. There is the Sexual Harassment Report Form for this purpose.
- Hold follow-up meetings with your team member to check how they are and offer support during this difficult time.

12.2 Support for a team member making a complaint

Sexual harassment concerns are very distressing for all involved.

- If you are experiencing sexual harassment at work, it may be having an impact on your physical and/or emotional well-being. Everyone is different but you may find you feel embarrassed, ashamed and/or fearful. You may feel you are losing confidence and a sense of self-worth and are avoiding situations and/or certain colleagues at work.
- If you think you are being sexually harassed, you should try to keep a record of what has happened to you, even if you feel unable to report it or chose not to report it at the time. The more detailed the account you keep the better, including the date, time and name of any witnesses. If you have made a note of the details of the incident(s) it avoids having to rely on your memory to recall the specific details later. There is the Sexual Harassment Report Form to help with this.
- Your line manager is usually the first point of support when you want to raise a concern or report sexual harassment. If you do not feel comfortable speaking to your line manager or the complaint is against your manager, you should speak to someone you are comfortable with, e.g. a colleague or another manager.

Any team member affected by sexual harassment is reminded that they may use the Employee Assistance Programme (EAP) Helpline for advice and counselling. Please refer to Smartbox Connect to learn more about our current EAP service: [Staff benefits explained](#)

Team members may also speak to the People Team for guidance on the policy.

12.3 Supporting a Colleague

- Although it is common practice for team members to raise concerns or complaints with managers, in some cases this may not be appropriate. In those scenarios, they may raise their concerns with a colleague.
- If you are approached by someone who has a concern about sexual harassment, you should listen impartially. You should handle the issue sensitively and confidentially and signpost the person to this policy for resources of support and the process to report it and encourage them to write down what has happened if they decide to report it at a later date.

- If the person raising the concern does not want to take any further action or access further support, you should try and support that decision. It is important that you assure them that if they changed their mind the complaint would be handled with sensitivity and confidentiality. However, if you are concerned about their safety or the alleged offence is of a serious nature you should contact the People Team for confidential advice. You may also wish to speak to our Designated Safeguarding Leads (DSL's) for impartial support.

12.4 Support for Witnesses

- You may witness behaviour that does not affect you directly but causes you concern. The behaviour(s) may be a one-off or may have been happening for a while. You may question whether what you are witnessing does amount to sexual harassment, especially if people around you are accepting of it. There are many reasons why people experiencing sexual harassment do not feel able to report it, so having support from colleagues who are prepared to challenge unacceptable behaviour and speak up is really important.
- If you witness something that causes you concern, you should raise your concerns as soon as possible. There are several ways to do this. You may want to speak to the person experiencing the sexual harassment privately, explain what your concerns are and offer support. Or you may, depending on the circumstances, challenge the inappropriate behaviour as it happens, if you feel safe and confident to do so. You can also raise your concerns with a manager.
- Depending on how extreme the situation is, it can be very harrowing to witness assault or harassment and can be triggering if you have had personal experiences. Making sure to prioritise your own wellbeing, if you are impacted, you should speak to your line manager or the People Team and seek support. Please see 12.6.

12.5 Support for Respondents

- If you are a respondent in a sexual harassment case, it can be a very worrying time and can affect your health or emotional well-being. Therefore, if you are named in a case, you should speak to your line manager, in the first instance, who will assist you in putting in place the necessary support and information you require throughout the whole process.
- Your department has a duty to address informally or formally any reports of sexual harassment. However, if you are a respondent, you should be reassured there is no presumption of guilt, and you will be given the opportunity to state your case during a fair and impartial process.
- It is helpful to make a note of the events as you recall them, as soon as you are aware that concerns have been raised by another person about your behaviour, so that you have relevant and factual information to hand to help you recall details later. This can be a handwritten log or digital record of any form that you feel is appropriate. The important thing is to capture as much detail as possible such as date, time, location, who was involved, behaviour and any conversation.

12.6 Sources of Support

Our Employee Assistance Programme (EAP) – Smart Health please refer to Smartbox Connect for further details. [Staff benefits explained](#)

YuMatter Helpline - through the Yulife app: [Staff benefits explained](#)

The Samaritans – a nationwide charity providing 24-hour confidential and emotional support for anyone in a crisis. Helpline 116 123: [Contact Us | Samaritans](#)

The Survivors Trust - believe that all survivors are entitled to receive the best possible response to their needs whether they choose to report. They support survivors of rape and sexual violence with a free confidential helpline: 0808 801 0818: [Our Helpline - The Survivors Trust](#)

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Safeline - are the leading specialist charity for sexual abuse and rape, offering counselling and support services for those who have been affected by the traumas: [Home - Safeline](#)

Rape Crisis - National charity and the umbrella body for a network of independent Rape Crisis Centres. They provide advice on how to get help if you have experienced sexual harassment or rape, and details of local Rape Crisis services and Sexual Assault Referral Centres (SARCs): [Rape Crisis England & Wales](#)

Approval

This policy was approved by the Board of Directors of Smartbox Assistive Technology Ltd on 19th

June 2025 by *Dougal Hawes*

Dougal Hawes, Group CEO.