INTERACTION RECRUITMENT PLC

PREVENTING HARASSMENT AND SEXUAL HARASSMENT POLICY AND PROCEDURE

1. POLICY STATEMENT

Interaction Recruitment Plc is committed to ensuring a safe and respectful work environment for all. Sexual harassment will not be tolerated in any form. Harassment, sexual harassment and victimisation will not be tolerated.

We will take all reasonable steps to prevent sexual harassment and all reasonable steps to prevent harassment by third parties where workers may be exposed to such harassment in the course of employment. We will act promptly when concerns are raised and keep our preventative arrangements under review.

2. SCOPE

This policy applies to all workers, including temporary, contract, agency, and permanent staff, as well as job applicants and anyone associated with Interaction Recruitment Plc. It applies to conduct connected with work, including at our premises, labour-user or client sites, recruitment and induction, work-related travel, training, meetings and social events, and work-related communications, social media, messaging platforms and personal devices where there is a connection with work.

3. WHAT IS HARASSMENT?

Harassment is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment can be a one-off incident or a pattern of behaviour, can take place online or in person, and does not have to be directed at the person who is affected by it.

Examples may include:

- Sexual comments, jokes, innuendo or questions about someone's sex life
- Displaying or sharing sexual or discriminatory images, messages or other content
- Unwanted touching, physical contact, sexual gestures or unwanted advances
- Comments about someone's body or appearance of a sexual nature
- Repeated unwanted invitations or messages
- Sexualised or discriminatory 'banter'
- Unwanted conduct through work-related messaging or social media

4. THIRD-PARTY HARASSMENT

A third party may include a labour user, labour-user manager or employee, customer, client, contractor, supplier, service user, visitor or member of the public. Workers should report harassment by third parties in the same way as harassment by colleagues.

5. ROLES AND RESPONSIBILITIES

- The Directors have overall responsibility for this policy and for ensuring appropriate preventative arrangements are in place.
- The Directors are responsible for implementing and reviewing this policy, the organisational baseline arrangements and relevant risk assessments.

- The Directors are responsible for ensuring appropriate training and communication across the organisation and, where relevant, with labour users.
- Managers must model appropriate behaviour, act on or report inappropriate behaviour they witness or become aware of, take concerns seriously and ensure workers are not disadvantaged for raising concerns.
- Staff involved in recruitment, worker management and client relationships must understand this policy and their role in prevention and response.
- Workers are expected to treat others with respect and are encouraged to report harassment, inappropriate conduct or relevant situations where they felt unsafe or at risk.

6. Preventative Measures

Interaction Recruitment Plc will take a proportionate, risk-based approach. We will:

- Periodically review our organisation-wide preventative arrangements using the ALP Organisational Baseline Checklist or an equivalent process
- Consider harassment risks associated with labour users, sites and types of assignment where relevant
- Review risks where material circumstances change or a complaint, concern, incident or significant near miss indicates existing controls may not be sufficient
- Provide workers with clear information about expected behaviour and reporting routes
- Provide appropriate training for managers, recruiters and other relevant staff
- Maintain more than one route for workers to raise concerns
- Take appropriate steps to prevent victimisation and retaliation
- Monitor whether preventative measures are working effectively in practice

The level of assessment and action will be proportionate to the circumstances and risks identified. A separate detailed risk assessment is not required for every worker or shift where the relevant working environment and risks are substantially unchanged.

7. WORKING WITH LABOUR USERS AND OTHER THIRD PARTIES

- We will seek to understand relevant labour-user arrangements for preventing and reporting harassment.
- We will ensure supplied workers have a direct reporting route back to us.
- We will raise relevant known risks or concerns with labour users where appropriate.
- We will cooperate with labour users over investigation, information sharing and preventative action where more than one organisation is involved.
- Where a significant known risk is not being adequately addressed, we will consider whether further supply remains appropriate until suitable measures are in place.

8. TRAINING AND COMMUNICATION

Workers will receive information appropriate to their role and working arrangements. Relevant managers, recruiters and staff will receive training suited to the risks and responsibilities of the organisation.

Training and communication will be reviewed following significant legal changes, incidents, worker feedback or evidence that arrangements are not effective. Where necessary, information will be provided in accessible formats or languages and understanding will be checked.

9. REPORTING CONCERNS

Anyone who experiences, witnesses or becomes aware of harassment, sexual harassment or a relevant situation giving rise to concern is encouraged to raise it as soon as they feel able. A delay in reporting will not, by itself, mean a concern will not be considered.

Concerns may be raised through any of the following routes:

- Senior Manager/HR: speakup@interactionrecruitment.co.uk

A worker does not have to report through a person who is involved in the concern or who controls their shifts or assignment.

Workers may also seek independent advice from Acas or the Equality and Human Rights Commission.

10. WHEN A CONCERN IS RECEIVED

- The concern will be taken seriously and considered promptly.
- Immediate risks to the worker and others will be considered.
- Appropriate interim measures may be considered, but the person raising the concern should not automatically be moved or disadvantaged.
- Relevant evidence will be identified and preserved where appropriate.
- The worker's views, safety and wellbeing will be considered.
- Where the matter involves a labour user or another organisation, appropriate liaison and information sharing will be considered.

11. INVESTIGATION

Where a formal investigation is appropriate, it will be conducted fairly and as impartially as reasonably possible. The person raising the concern, the person accused and relevant witnesses will normally be given an appropriate opportunity to provide information.

Evidence may include witness accounts, messages, emails, work-related messaging, CCTV where lawfully available, shift or allocation records, access records and relevant previous complaints or concerns.

Where the alleged harasser is employed or controlled by a labour user or another organisation, we will agree with the relevant organisation who is best placed to investigate each aspect and what action can be taken.

12. OUTCOME, CORRECTIVE ACTION AND SUPPORT

Appropriate action will be taken where allegations are upheld or weaknesses in preventative arrangements are identified. This may include disciplinary or management action, training, changes to supervision or working arrangements, additional monitoring, action involving a labour user or third party, or changes to policies and risk controls.

Support will be considered for the person raising the concern, witnesses and others affected. This may include changes to working arrangements, access to support services or reasonable time away from work for relevant appointments where appropriate.

If conduct may constitute a criminal offence, we will consider appropriate safeguarding and support, including supporting the affected person to contact the police where they wish to do so.

13. VICTIMISATION, RETALIATION AND WHISTLEBLOWING

Interaction Recruitment Plc prohibits victimisation or retaliation against anyone because they raised a discrimination or harassment concern, supported another person's complaint, gave evidence or participated in an investigation.

Potential retaliation may include unexplained reductions in hours, less favourable shifts, removal from an assignment, exclusion from opportunities, bullying or other detriment. Any concern about retaliation will be addressed promptly.

From 6 April 2026 sexual harassment can be a qualifying disclosure under whistleblowing law where the statutory requirements are met. Nothing in this policy or any confidentiality arrangement prevents a worker from making a protected disclosure or reporting a crime to the police.

14. CONFIDENTIALITY AND DATA PROTECTION

Information will be handled sensitively and shared only where reasonably necessary to investigate, protect those involved or take appropriate action. Absolute confidentiality cannot always be guaranteed.

Personal data and investigation records will be handled in accordance with applicable data protection requirements and retained securely for an appropriate period.

15. RECORDING, MONITORING AND REVIEW

- Appropriate confidential records will be kept of complaints, relevant informal concerns, incidents, significant near misses and action taken.
- We will review information for patterns or emerging risks where appropriate.
- We will periodically review whether training, reporting routes and other preventative measures are effective.
- This policy, the organisational baseline arrangements and relevant labour-user/site risk assessments will be reviewed following significant incidents, material changes in working arrangements or relevant changes in law or guidance.

16. CONTACT INFORMATION

- Confidential reporting route: Email speakup@interactionrecruitment.co.uk
- **External Support Services**: ACAS Helpline, Equality and Human Rights Commission (EHRC)

17. ACCOUNTABILITY, DOCUMENT AND VERSION CONTROL

This document is effective from:	*31st of October 2026*
This document is approved by:	*Andrew Gilchrist*
For questions or queries about this document, contact:	*Catherine Norman*