

Anti-harassment policy

We want Frontline to be a workplace where everyone feels respected, safe, and able to do their best work. Harassment, bullying or victimisation of any kind is not acceptable here and may result in disciplinary action, up to and including dismissal.

We are committed to fulfilling our legal duty under the Worker Protection (Amendment of Equality Act 2010) Act 2024. This includes taking proactive steps to prevent sexual harassment in the course of employment and investigating any reported incidents promptly and fairly.

1. Who this applies to

This policy applies to everyone working at Frontline; permanent or temporary staff, agency workers, contractors, freelancers, volunteers, and others connected to our work, both in-person and online.

2. What is harassment?

Harassment is unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It can be:

- Sexual harassment – e.g. unwanted touching, sexual jokes, or sending explicit messages.
- Less favourable treatment for rejecting or submitting to sexual harassment – e.g. being denied opportunities after refusing advances.
- Harassment related to a protected characteristic (such as race, religion, disability, age, or sexual orientation) – e.g. mocking someone's accent or excluding them based on their identity.

Examples of harassment include:

- Inappropriate messages or jokes
- Deliberate exclusion or belittling
- Unwanted physical contact
- Intrusive personal questions

Victimisation is a separate form of unlawful treatment under the Equality Act. It happens when someone is treated unfairly because they've made or supported a complaint about harassment or discrimination. While not classed as harassment, it is taken just as seriously at Frontline and may lead to disciplinary action.



Protected characteristics (from the Equality Act 2010):

You can see the full list of characteristics covered under the equality act in the Reporting and investigating discriminatory policy section 4.3 Relevant references).

3. Harassment or bullying?

Bullying is behaviour that intimidates or undermines. Harassment is defined in law and linked to protected characteristics. Both are serious and won't be tolerated at Frontline.

4. Where this applies

Unacceptable behaviour may lead to disciplinary action if it happens:

- At work (including remote or hybrid settings)
- During work-related social events
- On social media
- Outside work, where relevant to your role

Abuse of power, particularly by someone in a senior or influential position will be treated with the utmost seriousness and may lead to formal disciplinary action, including dismissal. We are committed to ensuring accountability, even when the person involved holds a leadership role.

5. Everyone's responsibility

Everyone has a role in preventing harassment. You can help by:

- Treating others with dignity and respect
- Considering how your behaviour affects others
- Challenging inappropriate behaviour when you see it
- Reporting concerns if you experience or witness harassment- please refer to the Reporting and investigating discriminatory incidents policy in the handbook for details of how to do so.

6. Managers and leaders

We expect managers and senior leaders to:

- Act as role models and foster inclusive teams
- Set clear expectations and challenge harmful behaviours
- Be alert to tension or exclusion within teams
- Support anyone raising a concern
- Seek feedback and maintain a safe culture



Frontline will provide relevant training and guidance to managers to help them recognise and respond appropriately to issues.

7. If something happens

We want everyone to feel able to speak up. You can:

- Discuss informally with your line manager, the Head of People, the People Team generally, or the anti-discrimination advocates (Josie Whitworth, Lisa Hackett) – please note that information will remain confidential unless explicit permission is given to act or unless the discrimination is unlawful and requires us to take formal action in accordance with our disciplinary policy.
- If you do not feel comfortable reporting openly, we have an anonymous online reporting form, although please note that this does limit the action that we are able to take. Please see the investigating discriminatory incidents policy for full details on this.
- You can raise a formal grievance – see grievance policy for full details. While you may choose to seek informal resolution, you are not required to do so before raising a formal grievance.

8. Third-party harassment

Third-party harassment (e.g. by programme participants, local authority partners, or suppliers) will not be tolerated. While individuals cannot bring a standalone legal claim for third-party harassment, employers may still be liable under other claims if reasonable steps are not taken.

The law requires us to take such steps to prevent third-party harassment. Staff are encouraged to report any incidents. We will take appropriate preventative measures (e.g. signage, briefings) and respond as needed, which may include warnings, bans, or police involvement.

9. Investigating complaints

We would investigate all complaints in the same way we would handle complaints within our disciplinary policy. All formal complaints will be:

- Treated promptly and fairly
- Handled by appropriate people at each stage
- Managed within clear but realistic timeframes

To ensure fairness, different individuals will oversee each stage of the process. Investigations, disciplinary hearings, and appeals will be managed by staff at escalating levels of seniority who were not previously involved.



If the complaint involves someone external, we will assess the best action to support staff and prevent reoccurrence.

Appeals will be heard by someone who wasn't involved in the process at earlier stages.

We will handle all complaints promptly, fairly and consistently. Please refer to disciplinary policy for details regarding timescales where applicable.

You won't be treated unfairly for making or supporting a complaint in good faith.

Malicious complaints

If a complaint is proven to be deliberately false and made in bad faith, it may lead to disciplinary action. This does not apply to complaints made in good faith, even if not upheld. See the Disciplinary policy for more information.

10. Supporting the investigation

Both the person raising the concern and the person accused will be treated with fairness and sensitivity. In some cases, temporary adjustments such as changes to working arrangements may be made while a concern is being reviewed.

11. Getting support

Support is available through:

- Your manager
- The People team
- The anti-discrimination advocates
- Our Employee Assistance Programme (EAP)

You can also contact external sources of support such as:

- [ACAS](#) – free and confidential advice on workplace rights
- [Equality and Human Rights Commission \(EHRC\)](#)
- Your trade union, if applicable
- Local advocacy organisations offering legal and emotional support

Consequences of a breach If harassment is confirmed, disciplinary action may be taken up to and including dismissal. Sanctions may include training, formal warnings, suspension, or dismissal, depending on the nature and severity of the behaviour. Where appropriate, we may also refer incidents to the police. We will review whether any risks were missed and take further steps to prevent future incidents.

12. How this fits with other policies

This policy works alongside other policies in our people policy handbook for employees. Please contact the people team if you cannot find these:

- Reporting and investigating discriminatory incidents policy
- Grievance policy
- Disciplinary policy
- Equality, diversity and inclusion policy
- Sexual harassment risk assessment