



## **Public Sexual**

## **Harassment Policy**

J D Gallagher Estate Agents

66 Market Street, Lancaster

October 2024

## PREVENTION OF SEXUAL HARASSMENT IN THE WORKPLACE

Sexual Harassment in the workplace is unacceptable in any form and is not tolerated at J D Gallagher Estate Agents and we are committed to taking reasonable steps to prevent this.

Please find the details of our Public Sexual Harassment Policy below which you should read and ensure that you familiarise yourself with.

If you are deemed to have breached our Sexual Harassment Policy, depending on the severity:

**EITHER**, you will be warned that continued provision of our services to you including but not limited to viewings, valuations, photo & measure appointments, will cease if you act in a similar way again. Should your behaviour recur, you will be informed that our services to you will cease. Any criminal acts will be reported to the police.

**OR** we will cease providing any services to with immediate effect and any criminal acts will be reported to the police. This will including blacklisting you from viewings, removing any of your advertised properties from online portals and ceasing any marketing.

This policy has been created based on the findings of our prevention of sexual harassment risk assessment for the company. A copy of this and our further control measures can be reviewed by requesting from a director.

We are dedicated to keeping this policy effective and up to date by reviewing it annually and by speaking with employees to identify any new or existing issues.

**Josh Heron** has been appointed as the 'Responsible Person' for the prevention of sexual harassment in this business.

## DEFINITION

Sexual harassment occurs when:

- A person is subjected to unwanted conduct of a sexual nature which has the purpose or effect of either violating their dignity, or creating an intimidating, hostile or degrading, humiliating or offensive environment.
- A person is treated less favourably because they submitted to or rejected that unwanted conduct.

A person can be sexually harassed by someone of the same or a different sex. The behaviour does not need to be sexually motivated and includes worker to worker harassment, harassment by third parties, and harassment by agents acting on behalf of the employer.

Conduct 'of a sexual nature' can include a range of behaviour, which includes but is not limited to, sexual comments or jokes, propositions and sexual advances, unwelcome touching, hugging, massaging, or kissing.

Our internal risk assessment highlighted the following categories of risk:

**Worker-to-Worker Risks** – this applies to our employees interacting with each other

**Third Party Risks** – this applies to our employees interacting with external contractors who services we engage for sales and rental properties and general members of the public with whom we conduct viewings, valuations and take-ons

A relevant internal sexual harassment policy is in place for employees of JDG.

## Fraternisation

For the avoidance of doubt, it is the policy of JDG that any form of sexual activity, whether consensual or not between our employees and a customer, client or contractor during the course of their working day is not acceptable and may result in disciplinary procedures. The purpose of this is to avoid any claims of unwanted sexual harassment in an environment that is very difficult to prove one way or another.

## REPORTING PROCEDURES

In the event of sexual harassment, it is important that you feel able to report it.

If you feel that you have experienced sexual harassment from an employee of JDG Estate agents, you may speak directly with any director, in confidence about any event that you believe to be sexual harassment. You can do this by phone, email or arrange an in-person meeting. The director may wish for more information and will request it if so.

We encourage you to report any alleged offence, but it will be your decision whether you would like further action to be taken or not. In the event that you do not want further action to be taken, we will still make a record and discuss the event.

The relevant director will undertake an investigation into the complaint which may include but not be limited to formal or informal conversations, analysis of written mediums e.g. email, text etc. where appropriate and will also seek advice from their HR experts, Peninsula. The outcome will be followed up by all parties involved if further action has been requested.

A confidential log of all complaints will be made and kept secure to ensure that the relevant investigations and outcomes are correctly carried out and any patterns in behaviour are identified.