

## Sexual Harassment Policy: Park Lane

### ABOUT THE POLICY

Park Lane has a zero-tolerance approach to sexual harassment and will take all complaints of this nature extremely seriously. The purpose of this policy is to support a working environment and venue culture in which sexual harassment is unacceptable. All people working in the venue are covered in this policy including contractors such as security and dancers.

Should you experience or witness any behaviour that you feel amounts to sexual harassment either towards yourself, or another member of staff we strongly encourage you to report it to the manager on duty as soon as you can. The Duty Manager may then inform Victoria Godfrey (General Manager), or/and Richard Harris (Human Resources).

### WHAT IS SEXUAL HARASSMENT

Sexual harassment is a form of sex discrimination. It takes place when someone is subjected to unwelcome and unwanted sexual behaviour or other conduct related to their gender.

Harassment is defined by law in the Equality Act 2010 as 'unwanted conduct related to a relevant 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'. In the case of sexual harassment, the relevant protected characteristic is 'sex'.

Behaviour that constitutes sexual harassment includes:

- Unwelcome behaviour of a sexual nature, this may be either physical or verbal,
- Inappropriate or suggestive remarks or verbal sexual advances,
- Indecent comments, jokes or innuendos relating to a person's looks or private life,
- Unwanted physical contact such as hugging, kissing or inappropriate touching,
- Requests for sexual favours,
- The display or circulation of pornography or indecent images.

Often, this kind of behaviour may be brushed off by the harasser as 'banter' or harmless flirting. It is important to remember that the impact the behaviour had is the most important factor, it is not so relevant whether the individual intended to cause offence, but rather that offence was caused by the conduct.

### WITNESSING AND HANDLING REPORTS OF SEXUAL HARASSMENT OF PATRONS

Park Lane considers it our responsibility to intervene when sexual harassment happens in our premises. If you witness or are alerted to sexual harassment taking place between patrons or between patrons and staff, you should alert the shift leader.

Interventions to challenge sexual harassment in our venue include:

- Watching/keeping an eye on the situation
- Speaking with target/victim of sexual harassment
- Speaking with perpetrator of sexual harassment
- Asking the perpetrator to leave the establishment
- Alerting Security
- Calling the Police

### WARNING SIGNS

Sexual harassment will not always have tangible evidence and therefore can go unnoticed by others. Sexual harassment training is completed by our employees with Shout Up. Since the victims are not always sure about their experience, they may not come forward to report it. This does not undermine the mental trauma and agony that a victim may experience. Warning signs can identify when an incident of sexual harassment occurs, and if intervened early could prevent further harassment, or assault from occurring.

Warning signs in our venue include:

- Any physical or verbal harassment
- Suspicious body language or/and predatory behaviours, for example; one person or group staring at a person or group for a long/unusual period of time; following a person or group around the venue without their consent; catcalling/whistling; aggressive behaviours, glares or comments
- Constant flirting without consent
- Unwelcome conversations and 'jokes' with sexual nature
- Insisting on buying someone a drink after they have already said no
- A target/victim looking uncomfortable or scared
- Target/victim shouting at perpetrator to leave them alone or/and repeatedly saying "no"
- Any sign of drug use/intoxication (possible spiking)

#### RESPONSIBILITY TO ACT

Bar Support and Bar Staff: Do not approach any situation without help. Report immediately to any Leader, Management or Security closest to you. Never put your own safety at risk. If a situation looks like it's getting out of hand then telling the appropriate staff members will be more effective and safe.

Team Leaders/Shift Leaders: Ensure Management and Security are aware of any incident/s. If safe to do so, offer the victim a safe and calm space and stay with them until Management are present. If one venue is closed, the closed venue will be a good quiet space to do this. If all venues are open, the medical room can be used as a safe and calm space.

Duty Manager and/or General Manager: Communicate with the victim and ask what they need, call the Police if necessary. Decide the severity of situation and then guide the Security and Leaders on what to do next. Duty Managers must inform the venue's General Manager if they are not already informed. General Management may need to assist the police and provide CCTV footage for their investigation. Write up a report after the incident.

Security: Ensure the staff and customers are not in any immediate danger. Communicate with the alleged perpetrator and ask for them to take part in a voluntary search. During this search, in accordance with our *Search Procedure Policy*, note down the name and date of birth from their ID for the search record. If the perpetrator does not want to take part in a search or give any of their personal details then they must leave the venue immediately unless they are being restrained for safety reasons, or detained for the Police. Assist General Management with any CCTV queries and Police communication and then write up an Incident report for the record.

#### PROCEDURE FOR REPORTING SEXUAL HARASSMENT BETWEEN STAFF

We understand that reporting sexual harassment can be intimidating, so we aim to make the process as clear and straightforward as possible.

If you choose to report the incident by speaking to a member of management on duty it will only be treated as a formal complaint if you make it clear that this is the route you would like to take. We are happy to offer informal advice about the possible action and outcomes open to you and will not force you to take any action you do not feel comfortable with.

Where we believe a criminal offence has taken place, we will advise you to report the incident to the police. If we have serious concerns about your safety or the safety of others, the venue has a duty to contact the police, but we will do our best to let you know before doing so. If your complaint is subject to an ongoing police enquiry, we will not investigate until the police investigation has run its course.

If we receive more than one complaint of a serious criminal nature; or where we are concerned that an allegation may form part of an ongoing pattern of behaviour that could put other party members or members of the public at risk; we reserve the right to report this matter to the appropriate authorities, including law enforcement. If we do need to do this, we will let you know.

If, after speaking to us, you decide to make a formal complaint; the process will be as follows:

First, we will seek a written statement from you the complainant.

Once we have your statement, and the statements of any witnesses you are able to provide, the respondent will be informed of the details of the complaint made against them. As part of this process, each party will be encouraged to provide any relevant evidence and names of witnesses that support their statement. This process will establish the matters of fact from both sides.

The statements from the complainant, respondent and any witnesses will then be provided to the General Management and Human Resources team of JAM Leisure Group, including Alnardo Folloni, Victoria Godfrey and Stephen Sweeney.

#### CONFIDENTIALITY

Allegations raised regarding sexual harassment will be taken seriously and treated confidentially. Park Lane gives an assurance that there will be no victimisation against any worker making a complaint under this policy or against staff who assist a colleague in making a complaint. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

#### DISCIPLINARY PROCEDURE

It is our policy to ensure that any disciplinary matter is dealt with fairly and that steps are taken to establish the facts and to give employees the opportunity to respond before taking any formal action. Further information on investigations, conduct, hearing and outcomes are set out in our Disciplinary Procedure, which is contained in our Staff Handbook.

#### GRIEVANCE PROCEDURE

Most grievances can be resolved quickly and informally through discussion with your Line Manager or the HR Manager. If this does not resolve the problem, you should initiate the formal procedure set out in our Grievance Procedure contained in the Staff Handbook.