



Sexual Harassment Policy

Spot White 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 door staff.

Should you experience or witness any behaviour that you feel amounts to sexual harassment either towards yourself, a friend or another member of staff we strongly encourage you to report it to a member of the management team as soon as you can.

We expect all of our team to complete “Shout up! Training” This is Mandatory and now forms part of your induction.

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

Spot White 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 supervisor/Duty Manager.

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 door staff
- Calling the Police

If the complaint is against a member of the team or door team this must be escalated to Operations Manager and a Director immediately.

Allegations against door staff/contractors

This must be raised with Operations Manager and/or a director immediately, It is then their responsibility to raise with the directors of the security company as soon as full information is received. We would then expect our Security companies to deal with any allegations or complaints raised within 5 working days (where there is not a police enquiry) Within that period the member of staff would not be able to come in to our venue, Where there are charges brought then we would expect the member of staff to be removed from the door until such time that these are concluded.

Where there are malicious/false allegations against members of the team we will encourage that team member to speak to the authorities regarding harassment charges.

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 the management team, 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, Spot White 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. We may need to review and supply CCTV footage to help with any investigation and we will always cooperate fully with the authorities giving them a named contact to ensure that any investigations are carried out quickly and with as little delay as possible.

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 the police. 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 Directors of Spot White and dealt with as part of our disciplinary process.

Confidentiality

Allegations raised regarding sexual harassment will be taken seriously and treated confidentially. Spot White 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. The office door is always open, our phones are always on, please talk to us.

Policy Date -16.10.21

Review Due 15.10.22