

World Headquarters Shout Up! Policy

World Headquarters Nightclub has a zero tolerance approach to sexual harassment and will take all complaints of this nature very 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 with this policy including contractors such as event promoters and door supervisors.

Should you experience or witness any behaviour that you feel amounts to sexual harassment towards anyone within the venue including yourself, we strongly encourage you to report it to the venue manager as soon as you can.

What is sexual harassment?

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

Harassment is defined by the 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 or humiliating or offensive environment for that individual'. In the case of sexual harassment, the relevant protected characteristic is 'sex'.

Behavior that constitutes sexual harassment includes:

- Unwelcome behaviour of a sexual nature, this may be 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 touching, kissing or inappropriate touching.
- Requests for sexual favours
- The display 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 crucial factor, it is not so relevant whether the individual intended to cause offence, but rather that offence was caused by the conduct.

Sometimes you may have felt unsafe at work. To try and reduce this we will be implementing a few policies:

- Bins are to be taken out as a group, never one person alone
- The street in front of the club is only to be cleaned as part of a group, with one person staying by the door.
- We currently have a 'no tops off' policy. If you see any patron breaking this policy please inform your supervisor/venue manager and they will take the following steps:
 1. Ask to put the top back on
 2. If refused, door staff will be alerted
 3. If still refused, the patron will be asked to leave the venue.

However, we may have events in which this is allowed, we will inform each of you in advance and no one will be asked to work that event if you feel you will be uncomfortable.

Witnessing and handling reports of sexual harassment of patrons

World Headquarters Nightclub 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 bar supervisor or venue manager.

We ask all our bar staff to be discreet if they are trying to check if what they are witnessing is harassment, as people can often say they are fine as they are intimidated. A catch of the person's eye or a discreet thumbs up, or approaching the potential victim when they're alone is ideal in case the perpetrator tries to escalate.

The ways the bar supervisor/venue manager will intervene 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.
- Alerting door staff.
- Asking the perpetrator to leave the establishment.
- Calling the police

While we want to make the target's experience central to our response, there may be times in which they don't want any action taken against those who have breached our

policy. In this instance we may need to override the target's preference and stick to our policy as this protects/reassures other customers who witness such incidents (and may be the next targets).

**We have established a 'Welfare Room' by the downstairs floor of the nightclub. It can be used as a safe private area for any customer wishing to make a complaint about the harassment they may have received within the club.*

The venue manager must always be informed of any customer complaints.

They will then ensure a report is written up of the incident within the Door Staff's incident book, and inform the Directors of what has happened.

They will also ask for the victim of harassment's contact details, and should they wish to share them, keep them updated in regards to any developments.

Procedure for reporting sexual harassment between staff.

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

If you choose to report the incident by speaking to a member of management, 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 you have serious concerns about your safety or the safety of others, World Headquarters Nightclub 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 the 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 witness will be provided to the General Manager of World Headquarters Nightclub.

Confidentiality

Allegations raised regarding sexual harassment will be taken seriously and treated confidentially. World Headquarters Nightclub 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.

This is also covered in the staff handbook you would have received upon joining the World Headquarters team, below is a refresher on the section in relation to harassment at work.

4. Valuing Diversity & Dignity at Work

a. Valuing Diversity

i) Statement

World Headquarters Club Ltd is committed to valuing diversity in all areas and seeks to provide staff with the opportunity for employment, career and personal development on the basis of ability, qualifications and suitability for the work as well as their potential to be developed into the job.

We will not tolerate direct or indirect discrimination against any person on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation whether in the field of recruitment, terms and conditions of employment, career progression, training, transfer or dismissal.

It is also the responsibility of all staff in their daily actions, decisions and behaviour to endeavour to promote these concepts, to comply with all relevant legislation and to ensure that they do not discriminate against colleagues, customers, suppliers, musicians, or any other person associated with World Headquarters Club Ltd.

ii)

In adopting Key Actions these principles, World Headquarters Club Ltd.:

Will not tolerate acts that breach this policy and all such breaches or alleged breaches will be taken seriously, be fully investigated and may be subject to disciplinary action where appropriate

Fully recognises it's legal obligations under all relevant legislation and codes of practice

Will allow staff to pursue any matter through the internal procedures which they believe has exposed them to inadequate treatment within the scope of this policy.

Will ensure that all managers understand and maintain their responsibilities and those of their team under this policy.

Will provide equal opportunity to all who apply for vacancies through open competition.

Will select candidates only on the basis of their ability to carry out the job, using a clear and open process.

Will provide all employees with the training and development they need to carry out their job effectively.

Will provide all reasonable assistance to employees who are or become disabled, making reasonable adjustments wherever possible to provide continued employment.

Will distribute and publicise this policy statement throughout the company.

b. Dignity at Work

i) Statement

World Headquarters Club Ltd believes that the working environment should at all times be supportive of the dignity and respect of individuals. If a complaint of harassment is brought to the attention of management, it will be investigated promptly and appropriate action will be taken.

ii) 'What' and 'How' of Harassment

Harassment can be defined as conduct, which is unwanted, offensive and affects the dignity of an individual or group of individuals.

Sexual harassment is defined as “unwanted conduct of a sexual nature, or other conduct based on sex, affecting the dignity of women and men at work.” This can include unwelcome physical, verbal or non-verbal conduct.

People can be subject to harassment on a wide variety of grounds including:

- Race, ethnic origin, nationality or skin colour.
- Sex or sexual orientation.
- Religious or political views.
- Willingness to challenge harassment, leading to victimisation.
- Disability.
- Other forms may include:
- Physical contact ranging from touching to serious assault.
- Verbal and written harassment through jokes, offensive language, gossip and slander, sectarian songs, letters and so on.
- Posters, graffiti, gestures, signs and emblems.
- Isolation at work including exclusion from social activities.
- Intrusion by pestering, spying or following someone.
- Bullying.

iii) What should I do if I am subject to Harassment?

If you feel you are being harassed you are strongly encouraged to seek early advice and support from your line manager. If you feel your line manager is harassing you, you should contact their immediate line manager.