Sexual Harassment Policy

Inn Cornwall Limited

The Victoria Inn – Threemilestone | The Victoria Inn – Roche | The Norway Inn – Perranarworthal

Policy owner	Approved by	Version	Effective date
Mark Holden, Company Director	Board of Directors / Senior Leadership	V2.0	July 2026
Next review date	**Applies to**	**Related policies**	**Document status**
July 2027, or earlier if legislation or business needs change	Employees, workers, agency workers, volunteers, contractors and third parties connected with work	Anti-Harassment & Bullying; Respectful Workplace; Inclusivity; Disciplinary; Grievance	Company policy – non-contractual guidance

Policy statement

All members of staff are entitled to be treated with dignity and respect at work. This means working in an environment that is safe, inclusive and free from sexual harassment, with clear routes to raise concerns and receive appropriate support if an issue arises.

Sexual harassment takes many forms. Whatever form it takes, it is unlawful under the Equality Act 2010, as amended. Inn Cornwall Limited will not tolerate sexual harassment or victimisation by employees, managers, workers, customers, suppliers, contractors, agency workers, volunteers, visitors or any other third party connected with work.

The law requires employers to take reasonable steps to prevent sexual harassment of their workers. Inn Cornwall Limited is committed to taking preventative action, encouraging early reporting, addressing concerns promptly and reviewing the effectiveness of this policy and related training.

Instances of sexual harassment or victimisation may result in disciplinary action up to and including summary dismissal. Conduct towards customers, suppliers or other third parties may also be dealt with under this policy and the disciplinary procedure.

1. Scope

This policy applies to all employees, workers, agency workers, volunteers and contractors in every area of Inn Cornwall Limited. It also applies to behaviour by customers, guests, suppliers, contractors, agency workers, members of the public or other third parties where the behaviour is connected to work.

This policy covers conduct occurring:

- in the workplace, including all pub, restaurant, bar, kitchen, cellar, accommodation and office areas;
- during work-related activities such as training, meetings, business travel, working lunches or staff social events;
- outside normal working hours where the situation is connected to work or involves a colleague or another person connected with Inn Cornwall Limited;
- online or through digital communications, including social media, WhatsApp, email, text messages or other messaging platforms;
- against anyone outside work where the incident is relevant to the person's suitability to carry out their role.

2. Definitions

2.1 Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also includes treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature, or because of matters related to sex or gender reassignment.

A person may be sexually harassed even if they were not the direct target of the conduct. Sexual harassment may be committed by a colleague, manager, customer, supplier, contractor, agency worker, volunteer, guest, visitor or other third party. It may occur face-to-face, in writing, online or through digital communications.

Examples include, but are not limited to:

- sexual comments, jokes or so-called "banter";
- displaying or sharing sexually graphic pictures, posters, images, videos or messages;
- suggestive looks, staring, leering or sexual gestures;
- propositions, sexual advances or pressure for sexual activity;
- making promises or threats in return for sexual favours;
- intrusive questions about a person's private life or sex life, or someone discussing their own sex life inappropriately;
- sexual posts or contact through online communications or social media;
- spreading sexual rumours about a person;
- sending sexually explicit emails, text messages, images or social media messages;
- unwelcome touching, hugging, massaging, kissing or other physical contact;
- inappropriate physical movements towards another person;
- sexual comments or conduct directed at, or witnessed by, customers, suppliers or other third parties.

2.2 Victimisation

Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do, a protected act under equality and harassment law. Protected acts include making or supporting a complaint, giving evidence or information, making an allegation that the Equality Act 2010 has been breached, or doing anything else connected with the Equality Act 2010.

Examples of victimisation include failing to consider someone for promotion because they made a sexual harassment complaint, excluding someone from meetings because they acted as a witness, or dismissing someone because they accompanied a colleague to a meeting about a complaint.

3. Our preventative approach

Inn Cornwall Limited will take reasonable and proportionate steps to prevent sexual harassment and to promote a respectful working culture. This includes:

- providing sexual harassment awareness training for staff and refresher training as appropriate;
- training managers on prevention, early intervention, receiving complaints, confidentiality, welfare support and investigation procedures;
- setting clear behaviour expectations through this policy and related company policies;
- encouraging early reporting through managers, HR, senior leadership and the company feedback platform;
- reviewing reported concerns, incident trends and workplace culture indicators;
- considering risk factors in customer-facing, late-night, lone-working or alcohol-related environments;
- using appropriate guest-management controls such as refusal of service, removal from premises, bans and Pubwatch reporting where appropriate;

- reviewing this policy regularly and communicating significant updates to the workforce.

4. Responsibilities

4.1 All staff

All staff are expected to behave in line with this policy, treat others with dignity and respect, challenge inappropriate behaviour where safe to do so, and report concerns that they experience or witness.

4.2 Managers and supervisors

Managers and supervisors must:

- lead by example and maintain a respectful workplace;
- take all concerns seriously and never ignore, dismiss or minimise reports;
- escalate complaints promptly to HR or senior leadership;
- record concerns and actions taken appropriately;
- protect confidentiality as far as possible;
- take steps to prevent retaliation or victimisation;
- consider immediate welfare and safety measures for those affected;
- complete required training and support staff to understand this policy.

4.3 Senior leadership

Senior leadership has overall responsibility for ensuring this policy is implemented, reviewed and communicated, and for ensuring that appropriate action is taken where concerns are reported.

5. What to do if you are subject to sexual harassment or victimisation

We recognise that sexual harassment and victimisation can be sensitive, distressing and personal. You should not feel under pressure to deal with the matter alone. You may use any of the reporting routes below, whether the matter involves a colleague, manager, customer, supplier, contractor, agency worker, guest, visitor or other third party.

5.1 Informal approach, where appropriate

If you feel comfortable and safe to do so, you may tell the person that their behaviour is unwelcome and ask them to stop. This can be done verbally or in writing. You may ask a colleague support person to help you.

An informal approach is optional. You are not required to confront the person, especially where the behaviour is serious, repeated, involves a power imbalance, involves a customer or third party, or where you do not feel safe doing so.

5.2 Colleague support person

A colleague support person may be a senior colleague, manager, Mental Health First Aider, HR representative, Director or other trusted colleague. They can provide support and help you raise the issue. The colleague support person should not be the same person who investigates the matter if it becomes a formal complaint.

5.3 Formal reporting routes

You may report sexual harassment or victimisation by:

- speaking to your General Manager or another manager;
- contacting Mark Holden, Company Director;
- emailing hr@inncornwall.co.uk;
- using the company feedback platform at feedback.inncornwall.co.uk;

- speaking to another senior colleague of your choice if you do not feel comfortable using the above routes.

Reports made through the feedback platform will be reviewed regularly by senior management. Anonymous reports may be made through the platform and will be investigated wherever sufficient information is available.

If possible, please keep a note of what happened, including the name of the alleged harasser, the nature of the behaviour, dates and times, witnesses, any supporting evidence and any action already taken. Lack of detailed notes will not prevent a concern from being taken seriously.

6. What to do if you witness sexual harassment or victimisation

If you witness sexual harassment or victimisation, you are encouraged to take appropriate action. You should not take any action that may put you at risk of sexual harassment, confrontation or other harm.

Where safe and appropriate, you may intervene to prevent the matter continuing. If you cannot do this, you may support the person affected, encourage them to report the matter, or report the matter yourself using the routes set out in this policy.

Managers who witness or are told about potential sexual harassment must escalate the matter to HR or senior leadership, even where the person affected is unsure whether they want to make a formal complaint. Senior leadership will handle this sensitively and will consider the wishes, welfare and safety of the person affected while also meeting the company's duty to protect staff.

7. Formal complaint and investigation process

Allegations of sexual harassment and victimisation will be treated seriously and may be considered under the disciplinary procedure. Each situation will be considered on its own facts and handled fairly, sensitively and promptly.

On receipt of a formal complaint, Inn Cornwall Limited will consider what immediate steps may be needed to protect those involved and support a fair investigation. This may include temporary changes to duties, working arrangements, supervision or work area, or suspension with contractual pay where appropriate. Any such measures are neutral and do not imply that a conclusion has been reached.

The person dealing with the complaint will normally invite the complainant to a meeting within five working days of receipt of the complaint, at a reasonable time and location, to discuss the matter and begin a thorough investigation. The complainant may be accompanied by a colleague support person, work colleague or trade union representative where applicable.

Those involved in the investigation will be expected to maintain confidentiality. Breach of confidentiality may be dealt with under the disciplinary procedure.

On conclusion of the investigation, which will normally be within 10 working days of the investigation meeting where reasonably practicable, the investigator's findings will be provided in writing. Where further time is required due to complexity, availability of witnesses or other reasonable factors, the person raising the complaint will be updated.

8. Appeal

If you are dissatisfied with the findings, you may appeal in writing within five working days of receiving the outcome. Appeals should be sent to Justin Barnett or another Director if Justin Barnett has already been involved in the matter.

An appeal meeting will be arranged. As far as reasonably practicable, the appeal will be handled by someone not previously involved and, where possible, more senior than the original decision-maker. You may be accompanied by a work colleague or trade union representative. The final decision will normally be confirmed in writing within 10 working days of the appeal meeting.

9. Support and welfare

Regardless of the outcome, Inn Cornwall Limited is committed to providing appropriate support to staff involved in a complaint. This may include welfare check-ins, temporary workplace adjustments, mediation where appropriate, additional management support, signposting to external support, and access to the Licensed Trade Charity or other relevant wellbeing support services.

Mediation will not normally be appropriate where there are serious allegations, a significant power imbalance, or where the person affected does not freely agree to it.

10. Third-party sexual harassment

Third-party sexual harassment occurs when a member of our workforce is subjected to sexual harassment by someone who is not part of our workforce but is encountered in connection with work. This may include customers, guests, suppliers, contractors, agency workers, visitors or members of the public.

Third-party sexual harassment of our workforce is unacceptable and will not be tolerated. Staff are encouraged to report third-party harassment as soon as possible using any of the reporting routes in this policy.

Where a customer, guest or other third party sexually harasses a member of staff, Inn Cornwall Limited may take action including:

- challenging the behaviour where safe and appropriate;
- refusing service or removing the person from the premises;
- warning the person about their behaviour;
- banning the person from one or more venues;
- recording the incident in the appropriate incident record;
- sharing relevant information via Pubwatch where appropriate;
- reporting criminal behaviour to the police or other relevant authorities;
- reviewing whether further preventative action is needed.

Inn Cornwall Limited will also not tolerate sexual harassment by staff towards customers, guests, suppliers, contractors or other third parties. Such conduct may result in disciplinary action up to and including summary dismissal.

11. Disciplinary action

If the allegation of sexual harassment or victimisation is upheld, the harasser or victimiser may be subject to disciplinary action in accordance with the disciplinary procedure, up to and including summary dismissal.

When deciding the appropriate sanction, Inn Cornwall Limited will consider the circumstances of the case, including any aggravating factors. Examples may include abuse of power over a more junior colleague, repeated conduct, targeting a vulnerable person, retaliation, or conduct involving a customer-facing or public environment.

A complaint that is not upheld will not in itself result in disciplinary action against the complainant. Action will only be considered where there is evidence that a complaint was knowingly false or made in bad faith.

12. Protection from victimisation and retaliation

You will not be victimised or retaliated against for raising a concern, making a complaint in good faith, supporting someone else to make a complaint, giving evidence or participating in an investigation. Any retaliation or victimisation will be treated as a serious disciplinary matter.

13. Confidentiality and record keeping

Inn Cornwall Limited will handle complaints as confidentially as reasonably possible, while recognising that information may need to be shared to investigate properly, protect staff, take appropriate action or comply with legal obligations.

Records of complaints, investigations, outcomes, actions taken and support measures will be retained securely and in accordance with data protection requirements and company retention arrangements.

14. Training

Inn Cornwall Limited will provide training to staff so there is a clear understanding of what sexual harassment is, how it may occur, expected standards of behaviour, how to report concerns, how complaints will be handled and the potential consequences of breaching this policy.

Managers will receive training on implementing this policy, preventing and managing sexual harassment in the workplace, responding to disclosures, immediate safeguarding and welfare measures, confidentiality, escalation and investigation procedures.

Training will be refreshed as appropriate and reviewed for effectiveness.

15. Related policies

This policy should be read alongside Inn Cornwall Limited's Anti-Harassment & Bullying Policy, Respectful Workplace Policy, Inclusivity Policy, Grievance Procedure and Disciplinary Procedure. Where an issue falls across more than one policy, Inn Cornwall Limited will decide the most appropriate route while ensuring the matter is handled fairly, sensitively and consistently.

16. Review

This policy will be reviewed at least annually, or earlier where there are changes in legislation, guidance, business operations, risk factors, training outcomes or reported concerns. Any significant changes will be communicated to staff.