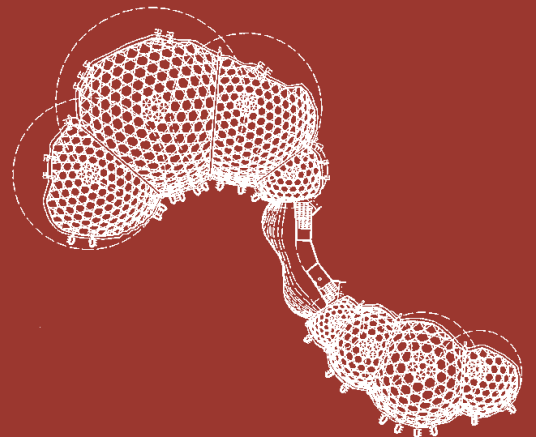
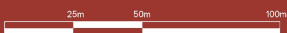


HR 38

SEXUAL HARASSMENT POLICY



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Sexual Harassment Policy

Human Resources

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London

FOR

All Employees and
Contractors

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HR 38

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Purpose

Everyone at Grimshaw is entitled to be treated with dignity and respect at work. This means being free from sexual harassment, feeling safe and supported, and knowing how to raise a concern if this behaviour happens.

Sexual harassment can take many forms. Whatever form it takes it is unlawful under the Equality Act 2010 as amended and we will not tolerate it.

The law requires employers to take all reasonable steps to prevent sexual harassment of their workers.

We take all reasonable steps to prevent sexual harassment and have clear reporting procedures for anyone who wants to make a complaint. If you have experienced sexual harassment, or have witnessed it, we encourage you to tell us so we can deal with the matter as quickly and sensitively as possible.

The London Managing Partner has overall responsibility for the operation of this policy and may delegate elements of implementation or decision-making to the People Lead. Our managers will maintain an open-door policy, and we encourage all staff to come forward with any concerns in relation to sexual harassment. All our staff have a responsibility to behave in line with the requirements of this policy.

Instances of sexual harassment or victimisation may lead to disciplinary action up to, and including, summary dismissal.

This policy is reviewed regularly to ensure it remains up to date and to monitor its effectiveness. Any changes required will be implemented and communicated to our staff.

Scope

We do not tolerate any form of sexual harassment and want everyone who works with us to have a safe and supportive working environment. This policy applies to all UK employees, workers, agency workers, work experience students and contractors, wherever they are based or working, including anyone seconded to, or working at, overseas offices or sites.

Where an overseas site or office is subject to local laws or standards that offer greater protection against sexual harassment than UK law, the higher standard will apply. Where local protections are less robust than this policy, this policy will continue to apply in full for UK employees.

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Definitions

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 covers treating someone less favourably because they have submitted to, or refused to submit to, wanted or unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may come from a colleague, a manager, or a third party such as a client, contractor or visitor. It does not have to happen in person: it can happen by email, social media or messaging apps such as WhatsApp. Someone can be sexually harassed even if the behaviour was not aimed at them. Examples include, but are not limited to:

- sexual comments or jokes, which may be referred to as “banter”
- displaying sexually graphic pictures, posters, or photos
- suggestive looks, staring or leering
- propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person's private or sex life or a person discussing their own sex life
- sexual posts or contact in online communications, including on social media
- spreading sexual rumours about a person
- sending sexually explicit emails, text messages or messages via other social media
- unwelcome touching, hugging, massaging, or kissing.

Victimisation

Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do, an act which is protected under discrimination and harassment laws. These are outlined below. It is not necessary for the person to have done the protected act for detrimental treatment to be considered as victimisation.

The protected acts are:

- making a claim or complaint under the Equality Act 2010 (e.g., for discrimination or harassment)
- helping someone else to make a claim by giving evidence or information in connection with proceedings under the Equality Act 2010
- alleging that someone has breached the Equality Act 2010
- doing anything else in connection with the Equality Act 2010.

Examples of victimisation may include:

- failing to consider someone for promotion because they have previously made a sexual harassment complaint
- dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint
- excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

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Circumstances which are covered.

This policy covers behaviour which occurs in the following situations:

- a work situation
- a situation occurring outside of the normal workplace or normal working hours which is related to work, e.g., a working lunch, a business trip, or social functions
- outside of a work situation but involving a colleague or other person connected to Grimshaw, including on social media
- against anyone outside of a work situation where the incident is relevant to your suitability to conduct the role

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

We are committed to ensuring that there is no sexual harassment or victimisation in our workplace.

Allegations of sexual harassment and victimisation will be treated as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of our disciplinary procedures, a copy of which is available in the Grimshaw Guides on Atlas.

Informal complaint

We recognise that complaints of sexual harassment or victimisation can be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances, you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper. This person cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.

If you feel comfortable doing so, you can tell the harasser informally that their behaviour is unwelcome and ask them to stop. This does not have to be face to face: you could send an email or message or speak to your confidential helper about how to approach it. You are never required to address the harasser directly, and choosing not to do so will not count against you or delay a formal complaint. You can also raise concerns with your manager at any time, for example in a one-to-one meeting. They will take your concerns seriously and may encourage you to follow the formal reporting procedures below.

Formal complaint

Where the informal approach fails, or if the sexual harassment or victimisation is more serious, you should bring the matter to the attention of the People Lead as a formal written complaint. Again, your confidential helper can assist you with this.

If possible, you should keep notes of what happened so that the written complaint can include:

- the name of the alleged harasser
- the nature of the alleged harassment
- the dates and times when the alleged harassment occurred
- the names of any witnesses
- any action already taken by you to stop the alleged harassment.

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On receipt of a formal complaint, Grimshaw will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. Where practicable, this will involve a temporary transfer of the alleged harasser to another work area, or suspension with contractual pay, until the matter has been resolved.

In some cases, for example where the alleged harasser holds a senior role and the working relationship between the parties makes it impractical to separate them in this way, it may not be feasible to relocate the alleged harasser alone. In these circumstances, Grimshaw may instead offer the accuser a temporary transfer to another work area, with their agreement, as an alternative means of achieving separation during the investigation. The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and conduct a thorough investigation. The meeting will normally be held within five working days of receipt of your complaint. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence may be dealt with under the disciplinary procedure.

On conclusion of the investigation, which will normally be within 10 working days of the meeting with you, the decision of the investigator, detailing the findings, will be sent in writing to you.

You have the right to appeal against the findings of the investigator. If you wish to appeal, you must inform the Group Managing Partner within five working days of receiving the outcome. You will then be invited to a further meeting. As far as reasonably practicable, Grimshaw will be represented by a more senior manager than the manager who attended the first meeting (unless the most senior manager attended that meeting).

Following the appeal meeting, you will be informed of the final decision, normally within 10 working days, which will be confirmed in writing.

Regardless of the outcome of the procedure, we are committed to providing the support you may need. This may involve mediation between you and the other party or some other measure to manage the ongoing working relationship.

You will not be victimised for having brought a complaint.

What to do if you witness sexual harassment or victimisation

If you witness sexual harassment or victimisation, you are encouraged to take appropriate action to address it. You should not take any action that may put you at risk of sexual harassment or other harm. If you feel able, you should intervene to prevent the matter from continuing. If you are not able to do this, your action may include offering support to the person who has been sexually harassed and encouraging them to report the incident or reporting the incident yourself.

If you report an incident, you should bring the matter to the attention of the People Lead in writing.

Your concerns will be managed by the People Lead, who will sensitively talk to the person subject to sexual harassment to determine how they want the matter to be handled.

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 who is encountered in connection with work. This includes clients, consultants, suppliers, contractors, visitors, members of the public, friends and family of colleagues, delegates at a conference, and self-employed contractors.

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Third-party sexual harassment of our workforce is unlawful and will not be tolerated. The law requires Grimshaw to take all reasonable steps to prevent sexual harassment by third parties and we are committed to doing so.

The law does not provide a mechanism for individuals to bring a claim of third-party harassment alone. However, an employer's failure to take all reasonable steps to prevent third-party sexual harassment may result in legal liability in other types of claims.

To prevent third-party sexual harassment from occurring, we will:

- inform third parties, such as suppliers, of our zero-tolerance approach to sexual harassment through our company website

If you have been subjected to third-party sexual harassment, you are encouraged to report this as soon as possible to the People Lead.

Should a third party sexually harass a member of our workforce, we will take appropriate action, which may include warning the third party about their behaviour, restricting contact with them, or ending the relevant working relationship where appropriate. Any criminal acts will be reported to the police.

Disciplinary action

If the decision is that the allegation of sexual harassment or victimisation is well founded, the harasser/victimiser will be liable to disciplinary action in accordance with our disciplinary procedure up to, and including, summary dismissal. An employee who receives a formal warning or who is dismissed for sexual harassment/victimisation may appeal by using our disciplinary appeal procedure.

When deciding on the level of disciplinary sanction to be applied, we will take into consideration any aggravating factors affecting the case. One example of aggravating factors is an abuse of power over a more junior colleague.

Training

We provide training to all our staff on sexual harassment to ensure there is a clear understanding of:

- what sexual harassment is, how it may occur and that it will not be tolerated
- expected levels of behaviour
- how they can report any incidents of having been sexually harassed or having witnessed it
- how acts of harassment will be dealt with under the disciplinary procedure, which can potentially result in dismissal

We ensure that all levels of management are trained on implementing this policy, including preventing and managing sexual harassment in the workplace and the procedure to follow if an allegation is reported.

We will regularly review the effectiveness of our training.

We provide refresher training as appropriate.

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Employee Assistance Programme

We would like to remind you that further support is available by contacting our Employee Assistance Programme (EAP), a confidential 24-hour telephone counselling service, which can be accessed via the Health and Wellbeing page on Atlas.

More details of this service are available from the Health and Wellbeing team or the HR team.

Date of approval:	17/08/2026
Signed:	
Print name:	Andrew Thomas
Job Title:	Managing Partner
Date:	17/08/2026