

Sexual Harassment Policy

1. Purpose

Zoom Recruitment Services is committed to providing a professional, respectful and inclusive environment in which all employees, workers, candidates, contractors and other individuals we work with are treated with dignity and respect.

We have **zero tolerance for sexual harassment or any form of harassment**.

We recognise that, as a recruitment company, our people may interact regularly with candidates, clients, hiring managers, contractors, suppliers and other third parties. We therefore take active steps to prevent harassment both within our organisation and in connection with the recruitment services we provide.

This policy sets out:

- what sexual harassment and other harassment means;
- the standards of behavior expected from everyone;
- our responsibilities as an employer;
- how we prevent harassment;
- how concerns and complaints can be raised;
- how allegations will be investigated;
- how we will deal with harassment by candidates, clients or other third parties; and
- the support available to anyone affected.

2. Legal Framework

This policy is intended to comply with applicable UK employment and equality legislation, including the **Equality Act 2010**, the **Worker Protection (Amendment of Equality Act 2010) Act 2023** and the **Employment Rights Act 2025**.

The Worker Protection Act introduced a legal duty on employers, from 26 October 2024, to take reasonable steps to prevent sexual harassment of employees.

From **30 October 2026**, the Employment Rights Act 2025 strengthens this obligation so that employers must take **all reasonable steps** to prevent sexual harassment.

From the same date, employers will also have an obligation not to permit harassment of employees by third parties where the employer has failed to take all reasonable steps to prevent it.

Zoom Recruitment will therefore adopt a proactive approach to preventing harassment rather than waiting for an incident to occur.

3. Scope

This policy applies to:

- all employees;
- workers and contractors working for or on behalf of Zoom Recruitment;
- temporary and agency workers engaged by the company;
- directors and senior management;
- apprentices, interns and work experience personnel
- candidates and applicants interacting with our employees, where relevant;
- clients and hiring managers interacting with our employees;
- suppliers and other business partners; and
- any other person interacting with our employees in connection with our business.

The policy applies to conduct occurring:

- in the workplace;
- during recruitment activity;



- during candidate interviews and meetings;
- at client meetings;
- during business travel;
- at conferences and networking events;
- at work-related social events;
- over email, telephone, messaging platforms and social media;
- through video conferencing and other digital platforms; and
- anywhere else where the conduct is connected with work.

4. What is 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.

Sexual harassment can occur even where the person responsible did not intend to cause offence.

Examples may include:

- unwanted sexual comments, jokes or remarks;
- sexual comments about someone's body or appearance;
- unwanted flirting or sexual advances;
- asking intrusive questions about someone's sex life;
- displaying or sharing sexually explicit material
- sending sexual messages, photographs, videos, memes or images;
- making sexual gestures;
- unwanted touching or physical contact;
- repeatedly asking someone on a date after they have declined;
- making sexualised comments during interviews or recruitment conversations;
- making employment opportunities conditional upon sexual attention;
- making comments or suggestions about someone's sexuality or sexual relationships; or
- making sexually suggestive comments through email, Teams, WhatsApp, LinkedIn or other digital platforms.

A single incident may constitute sexual harassment.

5. Other Forms of Harassment

Harassment relating to a protected characteristic is also prohibited. This can include unwanted conduct related to characteristics such as:

- age;
- disability;
- race;
- religion or belief;
- sex
- sexual orientation;
- gender reassignment; or
- other characteristics protected by law.

Examples may include offensive jokes, comments, messages, stereotypes, insults, exclusion or other unwanted behaviour.

Zoom Recruitment will not tolerate bullying, intimidation, victimisation or retaliatory behaviour either.

6. Recruitment-Specific Standards

Recruitment is a relationship-driven industry and employees may be exposed to difficult or inappropriate behaviour from candidates, clients or other third parties.



No employee is expected to tolerate sexual harassment or inappropriate behaviour simply because it comes from a client, candidate or prospective employer. Examples include:

- a client making sexual comments about a recruiter;
- a candidate sending sexually suggestive messages to a recruiter;
- a hiring manager making inappropriate comments during a briefing or interview;
- a client asking a recruiter inappropriate personal or sexual questions;
- a candidate making sexual advances towards a member of staff;
- inappropriate behavior during client entertainment or networking;
- a client making employment opportunities conditional on inappropriate personal conduct;
- inappropriate comments during video interviews;
- sexualised messages sent through LinkedIn, WhatsApp or other recruitment platforms; or
- a candidate or client repeatedly contacting an employee after being asked to stop.

Such behaviour should be reported and will be taken seriously.

7. Our Preventative Approach

Zoom Recruitment will take **all reasonable steps** appropriate to our organisation and activities to prevent sexual harassment. These steps will include, where appropriate:

7.1 Risk Assessments

We will periodically assess the risk of sexual harassment and harassment occurring within our business. Risk assessments will consider:

- the nature of recruitment work;
- employee roles;
- client and candidate interactions;
- lone working;
- meetings outside the office;
- business travel;
- work-related social events;
- alcohol and hospitality;
- online communications;
- power imbalances;
- previous complaints or incidents; and
- any particular groups or circumstances that may create increased risk.

Where risks are identified, appropriate preventative measures will be implemented.

7.2 Training

All employees will receive appropriate training on:

- sexual harassment;
- unacceptable behavior;
- recognising inappropriate conduct;
- bystander responsibilities;
- reporting concerns;
- handling disclosures;
- dealing with clients and candidates;
- third-party harassment; and
- managers' responsibilities.

Managers and senior employees may receive additional training on handling complaints and preventing harassment.

Training will be refreshed periodically and when legislation or organisational circumstances require it.

7.3 Standards for Clients



Where appropriate, our client contracts, terms of business and service agreements will include provisions requiring professional and respectful conduct towards our employees.

Clients will be informed that harassment of our employees will not be tolerated.

Where a client or hiring manager behaves inappropriately, Zoom Recruitment may take action including:

- raising the issue with the client;
- requiring the behavior to stop;
- changing the contact arrangements;
- removing an employee from the account or assignment;
- escalating the matter to senior management;
- suspending or terminating services; and/or
- taking other appropriate action.

We will not put commercial considerations ahead of the safety and dignity of our employees.

7.4 Recruitment Processes

Our recruitment processes will be designed to minimise foreseeable risks.

Where appropriate, we will:

- provide clear expectations to clients and candidates;
- use professional communication channels;
- keep appropriate records of significant incidents;
- provide employees with access to management support;
- avoid unnecessary one-to-one meetings in inappropriate settings;
- consider the risks associated with lone working and out-of-office meetings; and
- take additional precautions where a particular risk has been identified.

8. Reporting a Concern

Anyone who experiences, witnesses or becomes aware of sexual harassment is encouraged to report it as soon as reasonably practicable.

Reports can be made to: **Senior Management:** Lucy Staines – admin@zoomrecruitment.co.uk

Employees are not required to report an issue only to their immediate manager.

If the concern involves their manager, they can report it to HR, a director or another designated reporting contact.

Reports may be made verbally or in writing.

Employees should report incidents even where they are unsure whether the behaviour legally amounts to sexual harassment.

We also encourage employees to report situations where they feel at risk of sexual harassment, even if an actual incident has not yet occurred.

9. Immediate Safety

If an employee feels unsafe or believes there is an immediate threat, their immediate safety takes priority. They should, where possible:

- remove themselves from the situation;
- contact a manager or colleague;
- use agreed workplace safety procedures; and
- contact the emergency services where appropriate.

Employees will not be criticised for removing themselves from a situation where they reasonably believe they are at risk.



10. Handling Complaints

All complaints will be treated seriously, sensitively and as confidentially as reasonably possible.

Depending on the circumstances, Zoom Recruitment may:

1. acknowledge the complaint;
2. assess any immediate safeguarding or workplace risks;
3. consider whether interim measures are required;
4. appoint an appropriate person to investigate;
5. speak to the person making the complaint;
6. speak to the person accused;
7. interview witnesses;
8. review relevant emails, messages or other evidence;
9. reach findings based on the available evidence; and
10. take appropriate action.

Investigations will be conducted fairly and without assuming that an allegation is either proven or unfounded before the relevant evidence has been considered.

Where appropriate, disciplinary or grievance procedures will be followed.

11. Third-Party Harassment

Third-party harassment is harassment committed by someone who does not work for Zoom Recruitment. For a recruitment business, third parties may include

- clients;
- prospective clients;
- candidates;
- hiring managers;
- contractors;
- suppliers;
- visitors;
- customers; and
- other people encountered through our work.

Zoom Recruitment will take all reasonable steps to prevent employees from being subjected to harassment by third parties. Where third-party harassment occurs, we will consider appropriate action, which may include:

- contacting the third party;
- requiring the conduct to stop;
- changing or restricting communications;
- changing meeting arrangements;
- removing an employee from direct contact;
- escalating the issue to the client's senior management;
- reviewing the commercial relationship;
- suspending or terminating services;
- refusing further assignments involving the individual; and
- taking any other appropriate action.

The fact that the alleged harasser is a client, candidate or commercially important contact will not prevent us from taking appropriate action.

12. Confidentiality

Information relating to a complaint will be shared only with those who need the information to deal with the matter appropriately, subject to legal and safeguarding requirements.



Absolute confidentiality cannot always be guaranteed.

Employees should not investigate complaints themselves or discuss confidential allegations unnecessarily with colleagues or third parties.

13. Victimisation and Retaliation

Zoom Recruitment will not tolerate victimisation or retaliation against anyone who:

- raises a genuine concern;
- makes a complaint;
- supports someone making a complaint;
- participates in an investigation;
- provides evidence; or
- raises concerns about workplace harassment.

Any retaliatory behaviour may result in disciplinary action.

14. False or Malicious Complaints

Making a genuine complaint will never result in disciplinary action simply because the allegation is not ultimately upheld.

However, deliberately making a malicious or knowingly false allegation may constitute misconduct and may be dealt with under the company's disciplinary procedure.

15. Support

Anyone affected by sexual harassment will be offered appropriate support. Depending on circumstances, this may include:

- HR support;
- a designated manager;
- an employee assistance programme
- reasonable adjustments;
- temporary changes to working arrangements;
- time away from particular duties or interactions;
- access to external specialist support; and
- other appropriate assistance.

Support may also be offered to witnesses and, where appropriate, individuals who have been accused of harassment.

16. Manager Responsibilities

Managers have a particular responsibility to prevent and address harassment. Managers must:

- take concerns seriously;
- listen without dismissing or trivialising the issue;
- avoid blaming the person raising the concern;
- escalate concerns appropriately;
- maintain confidentiality;
- take reasonable steps to protect employees;
- ensure concerns are properly recorded;
- avoid attempting to conduct an informal investigation without guidance where a formal investigation may be required; and
- take action where inappropriate behavior is observed.

Managers must not tell an employee to "ignore it", "put up with it" or accept inappropriate behaviour because the person involved is a client or candidate.

17. Employee Responsibilities

Office 2 International House, Cray Avenue, Orpington, Kent, BR5 3RS
t. 0203 9880555 | e. admin@zoomrecruitment.co.uk | www.zoomrecruitment.co.uk



All employees are expected to:

- treat colleagues, candidates, clients and other individuals with dignity and respect;
- comply with this policy;
- avoid behavior that could reasonably be regarded as harassment;
- report concerns where appropriate;
- cooperate with investigations; and
- challenge or report inappropriate behavior where it is safe to do so.

Employees are encouraged to act as bystanders where appropriate, for example by interrupting inappropriate behaviour, supporting someone affected, or reporting an incident.

18. Disciplinary Action

Sexual harassment and other forms of harassment may constitute gross misconduct. Where allegations are upheld, disciplinary action may include:

- informal action;
- formal warnings;
- final written warnings;
- dismissal; or
- other appropriate action.

The level of action will depend on the circumstances and will be determined in accordance with the company's disciplinary procedure. Where the alleged harasser is a client, candidate or other third party, the company will consider the appropriate commercial, contractual and operational response.

19. Monitoring and Review

Zoom Recruitment will monitor the effectiveness of this policy.

This may include reviewing:

- complaints and reported incidents;
- themes and trends;
- employee feedback;
- training completion;
- risk assessments;
- client-related incidents;
- actions taken following complaints; and
- changes in legislation and official guidance.

Where appropriate, anonymised information may be reviewed to identify recurring risks.

This policy will be reviewed at least annually and sooner where legislation, guidance or business circumstances change.

20. Policy Statement

Zoom Recruitment is committed to creating a workplace where everyone can work without fear of sexual harassment, harassment, intimidation or retaliation.

We will not ignore inappropriate behaviour because it is committed by a client, candidate, senior employee or commercially important individual.

Everyone has the right to be treated with dignity and respect.

Any concerns should be raised promptly using the reporting routes set out in this policy.

