



# UK: *Seasonal steps to prevent sexual harassment*

3 DECEMBER 2025

## Your seasonal checklist:

### 1. Refresh and reissue your anti-harassment policy

- ♦ **Reminders:** Consider a refresher or reminder on the anti-harassment policy, particularly if staff have not received training this year.
- ♦ **Scope and clarity:** Define sexual harassment clearly, include practical examples (including work-related socials and online conduct), cover all staff and contractors, and signpost informal and formal reporting routes.
- ♦ **Tone:** Reissue ahead of the festive season with a short leadership message emphasising zero tolerance and the need for respectful conduct at work-related events, and the practical steps for raising concerns. Keep the tone warm but firm.
- ♦ **Accessibility:** Make the policy easy to find, concise, and consistent with your disciplinary and grievance procedures.

### 2. Deliver targeted, timely training

- ♦ **Core training:** Provide concise, scenario-based training to all staff, with realistic examples such as unwanted physical contact on the dance floor, comments on appearance, persistent advances after a “no”, and inappropriate messages via messaging and social media apps on or after the night.
- ♦ **Manager training:** Deliver separate role-specific training for managers on early intervention, handling on-the-night issues, preserving evidence, confidentiality and follow-up.
- ♦ **Quality and records:** Provide regular and refreshed training that is evaluated for effectiveness. Keep records of attendance. Consider bite-size refreshers in the week of key events.

### 3. Assess and take steps to reduce risk

- ♦ **Event risk assessment:** Identify factors that may heighten the risk of sexual harassment and the measures that can be taken to reduce those risks.

- ♦ **Typical controls:** Risk assessments should address, for example:
  - ♦ venue layout, including poorly lit or private areas that may make supervision difficult;
  - ♦ alcohol management (see point 5 below for further details);
  - ♦ ensuring safe transport arrangements and clear departure points;
  - ♦ guest lists, security, access controls and uninvited guest prevention;
  - ♦ clear pre-event briefing that cheerfully but firmly sets expectations and respectful behaviour; and
  - ♦ consider appointing trained, identifiable event leads who remain sober to monitor the event, support attendees and escalate issues.

#### 4. Brief your managers and event leads

- ♦ **Presence and approachability:** designating responsible managers/event leads for each event and brief them to be present, approachable and prepared to act.
- ♦ **Escalation:** Step in early. Sometimes, it only requires a quiet word with one or both parties.
- ♦ **Practical guidance:** Equip managers with guidance on how to deal effectively with on-the-night issues. A quiet word on the night is cheaper and less time-consuming than a grievance on Monday morning.

#### 5. Manage alcohol-related risks

- ♦ **Controls and service:** Think about how to manage risks associated with alcohol abuse. Consider issuing limited alcoholic drink tokens.
- ♦ **Choice and pacing:** Provide plentiful non-alcoholic options and water, offer food and avoid drinking games or pressure to participate.
- ♦ **Expectations:** In pre-event messages, set clear expectations for respectful conduct at all work-related gatherings and remind colleagues to drink responsibly. Enjoy the celebrations, look out for one another, and remember that the usual standards of behaviour apply. If in doubt, pace yourself and prioritise getting home safely.

#### 6. Manage risks associated with third parties

- ♦ **Scope:** Harassment can occur between employees, contractors, agency workers and third parties at work-related events. The preventative duty expects you to mitigate foreseeable risks, including with third parties such as suppliers and venues.
- ♦ **Contracting and briefings:** Incorporate expectations into contracts and booking terms, such as responsible alcohol services and escalation contacts. Circulate concise briefing notes and obtain written acknowledgment where possible.
- ♦ **On-site controls:** Check venue controls during planning and review third-party contact points such as venue staff, security, and entertainers, and identify high-risk interactions such as arrival and departure areas. Ensure third-party staff know who to contact if they witness or experience harassment during the event.

#### 7. Investigate fairly and act consistently

- ♦ **Procedure:** Apply your usual investigation procedure. Where the incident occurred at an off-site or social event, adjust for context and practicality.

#### 8. Context-specific considerations

- ♦ Off-site events can present unique challenges.
- ♦ There may be no witnesses, multiple witnesses, or witnesses who are third parties (e.g., venue staff, suppliers). Plan how to approach and obtain statements from non-employees and consider data-sharing constraints.
- ♦ Evidence can be transient, or you may not be given access to it.
- ♦ Recollections may be affected by alcohol and time delays. Use careful, trauma-informed interviewing, seek corroboration where possible, and record inconsistencies neutrally.

## 9. Audit, evidence and improve

- ♦ **Record-keeping:** Keep a clear audit trail and confidential records: policies, training content and attendance, risk assessments, pre-event communications, manager briefings, incident logs, informal and formal concerns raised, and post-event reviews.
- ♦ **Review cycle:** After the season, conduct a short debrief to capture lessons learned and to arrange any follow-up training. Where necessary, update your risk assessment and communication plans. Tribunals and the EHRC will look for a proactive system, not just a discarded paper exercise.
- ♦ Ensure that all reasonable steps and learning are fed into the risk assessment.

### Special considerations for inclusive, safe festivities

Be mindful of inclusion. Not everyone drinks alcohol, celebrates Christmas or enjoys late nights. Offer alternative activities, consider timing and accessibility, and avoid themes or games that could stray into stereotyping.

Remind staff about your social media policy and photograph-taking. Not everyone wants to be tomorrow's viral content. A celebration should feel safe and be enjoyed by everyone.

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