Prevention of Harassment Policy

Fresh Connection Ltd (company no. 05805560), trading as The Vaults & Garden, No. 2 King Edward Street, Oxford OX1 4HS

Contact: William Pouget, Managing Director.

Last reviewed: January 2026. Next review: January 2027.

1. Purpose and policy statement

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

We have zero tolerance of harassment, sexual harassment and victimisation. This means we will not accept it in any form, from anyone.

This policy explains:

- what harassment is;
- how we work to stop it happening;
- how to raise a concern;
- what we will do when a concern is raised.

This policy is not part of any contract of employment. We may change it at any time.

2. Who this policy covers

This policy applies to all staff, including part-time, temporary and casual staff. This includes front-of-house and kitchen staff.

It also applies to:

- agency workers;
- volunteers;
- contractors working for us.

It covers behaviour:

- at The Vaults & Garden;
- on client sites, including University of Oxford premises;
- at catering events, deliveries and off-site work;
- at work social events, such as staff parties;
- online, by phone, by text and on social media or group chats (for example WhatsApp), where it is linked to work.

It also covers how staff should behave towards customers, and how we protect staff from harassment by customers, suppliers, visitors and other third parties.

3. What harassment, sexual harassment and victimisation mean

These meanings come from the Equality Act 2010.

The law protects people from unfair treatment because of these "protected characteristics":

- age;

- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race (including colour, nationality and ethnic or national origin);
- religion or belief;
- sex;
- sexual orientation.

3.1 Harassment

Harassment is unwanted behaviour linked to a protected characteristic. It is harassment if it has the purpose or effect of:

- upsetting someone's dignity; or
- creating a frightening, hostile, degrading, humiliating or offensive place for them to work.

Under the law, harassment covers age, disability, gender reassignment, race, religion or belief, sex and sexual orientation. We go further. We will not accept harassment or bullying of anyone, for any reason.

What matters is how the behaviour affects the person. It can still be harassment even if the person doing it "did not mean it" or "was only joking". It can be one serious incident or a pattern of smaller ones.

Examples in a cafe or kitchen:

- jokes, nicknames or "banter" about someone's race, accent, religion, age, disability or sexuality;
- mocking someone's accent or English;
- leaving someone out of breaks, rotas or tasks because of who they are;
- shouting, swearing at or threatening someone during a busy service;
- comments about a person's religious dress or prayer times;
- sharing offensive memes or messages in the staff group chat.

3.2 Sexual harassment

Sexual harassment is unwanted behaviour of a sexual nature that upsets someone's dignity, or creates a frightening, hostile, degrading, humiliating or offensive place for them to work.

It is also harassment to treat someone worse because they rejected, or gave in to, sexual behaviour.

Anyone can be sexually harassed. It can happen between people of any sex.

Examples in a cafe or kitchen:

- brushing against someone on purpose in a tight kitchen or behind the counter;
- touching, hugging, kissing or patting someone without their consent;
- comments about someone's body, looks or clothes, including their uniform;
- sexual jokes, stories or questions about someone's sex life;
- staring, leering or rude gestures;
- asking someone out again and again after they have said no;

- sending sexual messages, photos or videos, including in group chats;
- putting up sexual pictures in staff areas;
- a customer making sexual comments to a server, or asking for a phone number in a way that makes them uncomfortable;
- offering a better shift, a tip or other reward in return for sexual favours.

3.3 Victimisation

Victimisation is treating someone badly because they have:

- made a complaint of harassment or discrimination;
- helped someone else make a complaint;
- given evidence or information in an investigation.

Examples: cutting someone's hours, giving them the worst shifts, ignoring them, or making fun of them because they complained.

This is protected as long as the person acted in good faith. A complaint that is knowingly false is not protected.

4. Our legal duty to prevent sexual harassment

Since 26 October 2024, employers have had a legal duty to take reasonable steps to prevent sexual harassment of their employees. This duty came from the Worker Protection (Amendment of Equality Act 2010) Act 2023. It is a duty to act before anything happens, not just to respond to complaints.

The Employment Rights Act 2025 has made this duty stronger. From 30 October 2026:

- employers must take "all reasonable steps" to prevent sexual harassment of their employees, not just "reasonable steps";
- employers can be legally responsible if a third party (for example, a customer, supplier, client or visitor) harasses an employee at work, and the employer did not take all reasonable steps to prevent it. This covers all types of harassment linked to a protected characteristic, not only sexual harassment.

The Government can also make regulations setting out which steps count as "reasonable". These could cover things like risk assessments, policies, reporting and complaint handling. At the time of writing, these regulations have not been published. We will update this policy when they are.

Since 6 April 2026, reporting sexual harassment can also count as "whistleblowing". This gives extra legal protection to people who report it.

This policy, our risk assessment (section 15), our training (section 13) and our complaints process (sections 6 to 8) are the steps we take to meet these duties.

5. How we expect staff to behave

Towards customers, staff must:

- be polite, friendly and professional at all times;
- treat every customer fairly, whatever their background;
- never make comments about a customer's looks, body or private life;
- never touch a customer unless it is needed for safety or first aid;

- not ask customers for personal contact details, or contact them on social media, for personal reasons;
- stay calm with difficult customers and ask a manager for help.

Towards colleagues, staff must:

- treat everyone with respect, including during busy or stressful services;
- not shout at, swear at, insult or threaten anyone;
- respect personal space in the kitchen, behind the counter and in changing areas;
- keep group chats and messages professional;
- speak up, or tell a manager, if they see harassment happen.

On client sites, including University of Oxford premises, staff must:

- follow this policy and the client's own site rules and codes of conduct;
- treat University staff, students and visitors with respect;
- report any problem to their manager straight away. Their manager will tell the client where needed.

6. How to raise a concern

If you are being harassed, or you see it happen to someone else, please tell us. Every concern will be taken seriously.

You can raise a concern with either:

- William Pouget, Managing Director.
- Natacha Cirou, Operations Manager.

If one of them is involved in your concern, go to the other one.

You can tell us in person, by phone, by email or in writing. You can bring a colleague or friend with you for support.

You do not have to wait until you have proof. Tell us as soon as you can, but it is never too late to raise a concern.

If you are in danger, call 999 first.

6.1 Raising a concern informally

Sometimes a quick, informal approach can stop the problem. For example:

- you may feel able to tell the person that their behaviour is unwelcome and ask them to stop;
- or William or Natacha can speak to the person for you, or help you talk to them.

You do not have to try the informal route. If the matter is serious, or you do not want to deal with it informally, you can go straight to a formal complaint.

Even when a concern is dealt with informally, we will keep a short note of it and check later that the behaviour has stopped.

6.2 Making a formal complaint

To make a formal complaint, tell William Pouget or Natacha Cirou that you want to make a formal complaint. If one of them is involved, go to the other one.

It helps if you can put it in writing, but you do not have to. If writing is hard for you, we will write it down with you and read it back to you.

It helps to tell us:

- what happened;
- who was involved;
- when and where it happened;
- who saw it, if anyone;
- any messages, photos or other evidence you have.

We will follow the steps in section 8.

7. Confidentiality and record keeping

We will keep your concern as private as we can. We will only share information with people who need to know, so we can deal with it properly. This may include the person you complain about, witnesses and, if needed, our HR or legal adviser, the client or the police.

We will tell you before we share anything important.

Everyone involved, including witnesses, must keep the matter private. Gossip about a complaint may be treated as misconduct.

We will keep a written record of every concern, informal or formal. The record will include what was reported, what we did, the outcome and the reasons.

Records are kept securely. Only William Pouget and Natacha Cirou can see them. We keep and use them in line with UK data protection law (UK GDPR and the Data Protection Act 2018).

We use records, without names, to spot patterns and improve this policy.

8. How we investigate a complaint

We will deal with every formal complaint fairly and quickly. We follow the Acas Code of Practice on disciplinary and grievance procedures. These are the steps:

1. We will confirm we have your complaint within 2 working days.
2. We will meet you within 5 working days to hear your concern. You can bring a colleague or trade union representative.
3. We will decide if anyone needs protecting while we investigate. For example, we may change rotas or shifts so people do not work together. We will try not to disadvantage the person who complained. In serious cases, the person complained about may be suspended on full pay. Suspension is not a punishment.
4. An investigator will speak to the person complained about, and to any witnesses, and look at any evidence. The investigator will be William or Natacha, whoever is not involved. If both are involved, or it is not suitable for either to do it, we will use an independent HR adviser.
5. We aim to finish the investigation within 20 working days. If it will take longer, we will tell you why and keep you updated.
6. We will tell you the outcome in writing. We will explain what we found and what action we will take.

7. If you are not happy with the outcome, you can appeal in writing within 5 working days. Where possible, the appeal will be heard by someone not involved before, such as an independent HR adviser.

These times are targets. Sometimes we may need more time, for example if someone is off sick. We will always keep you informed.

9. Support for the person affected

If you have been harassed, we will support you. This may include:

- changing rotas, shifts or tasks, if you want this;
- making sure you do not have to work alone with, or serve, the person involved;
- time off to attend appointments or get support;
- help to contact the police, your GP or support services;
- regular check-ins with William or Natacha.

We will listen to what you want. We will not make changes that leave you worse off without your agreement.

We will also treat the person complained about fairly. They will be told what the complaint is and can give their side.

10. Disciplinary action

Harassment, sexual harassment and victimisation are serious misconduct.

If we find that a member of staff has harassed or victimised someone, we will take disciplinary action. This can lead to a warning, a final warning or dismissal. Serious cases may be treated as gross misconduct, which can mean dismissal without notice.

If an agency worker, volunteer or contractor harasses someone, we may end their work with us. We will tell their agency or employer.

Managers who ignore harassment, or do not report it, may also face disciplinary action.

Making a complaint that you know is false is also misconduct. But if you raise a genuine concern and it is not upheld, you will not be punished.

11. Protection from victimisation

No one will be treated badly for raising a concern in good faith, or for helping with an investigation.

This means we will not cut your hours, change your shifts to punish you, ignore you, or treat you unfairly in any other way.

If you think you are being victimised, tell William Pouget or Natacha Cirou straight away. We will treat it as a new, serious complaint.

Anyone who victimises someone will face disciplinary action, up to and including dismissal.

12. Harassment by customers and other third parties

Staff should not have to put up with harassment from customers, suppliers, delivery drivers, visitors or client staff. It is not "part of the job".

If a customer or other third party harasses you:

1. you can stop serving them and walk away;
2. tell the manager on shift straight away;
3. the manager will take over and deal with the person.

Depending on how serious it is, the manager may:

- give the person a clear warning that their behaviour must stop;
- refuse to serve them;
- ask them to leave, and ban them from coming back;
- move you away from them, or make sure you are not left alone with them;
- on a client site, report it to the client's site manager or security, and the University where relevant;
- report it to the police if it may be a crime, for example sexual touching, threats or stalking.

If a supplier or contractor is involved, we will raise it with their employer. We may stop using them.

We will record every incident, even small ones. We will look at these records to see if we need to do more, for example change rotas or ask the client to take action.

You can also raise a concern about a third party using the steps in section 6. The same support, confidentiality and protection from victimisation apply.

13. Training and induction

All staff are told about this policy at induction, before or on their first shift. This includes part-time, temporary, casual and agency staff. We explain it in person and check that each person understands it. Each person signs the acknowledgement form.

All staff have refresher training at least once a year. We also remind staff at monthly team meetings and share any changes by WhatsApp, with confirmation required.

Managers and supervisors get extra training on:

- spotting harassment, including by customers;
- responding to a concern calmly and supportively;
- recording a concern and passing it on;
- handling difficult or abusive customers.

A copy of this policy is kept at each site where we work. Staff can ask for it in a different format, for example read aloud to them.

We keep a record of who has been trained and when.

14. Who is responsible for what

- William Pouget, Managing Director, has overall responsibility for this policy. He makes sure it is followed, resourced and reviewed.
- Natacha Cirou, Operations Manager, runs the policy day to day. She makes sure staff are told about it at induction, organises training, keeps records and carries out the risk assessment.
- Managers and supervisors must set a good example, step in when they see harassment, support staff who raise concerns and pass every concern to William or Natacha straight away.

- All staff must follow this policy, treat everyone with respect, and report harassment they experience or see.

15. Assessing the risk of sexual harassment

We carry out a written risk assessment of where sexual harassment, and harassment by customers, could happen in our work. We look at risks such as:

- late or early shifts, and travelling home in the dark;
- lone working, for example opening or closing up alone;
- alcohol at catering events, functions and parties;
- young or new staff, who may find it harder to speak up;
- busy, cramped kitchens and counters, and shared changing areas;
- working on client sites, including University of Oxford premises, where we do not control the space;
- regular customers or visitors who have behaved badly before;
- staff social events and group chats.

For each risk, we decide what to do. For example:

- rotas that avoid lone working where possible, and two people to open or close;
- a manager or supervisor on duty at events where alcohol is served;
- agreeing with clients before an event how we will deal with bad behaviour;
- clear notices to customers that abuse of staff will not be tolerated;
- checking in with staff after late shifts and events.

Natacha Cirou reviews the risk assessment at least once a year, after any incident, and before new types of work or new sites. We ask staff for their views when we do this.

16. Monitoring and review

William Pouget and Natacha Cirou look at all harassment records at least once a year. They check for patterns, for example a problem at one site, on one shift or with one customer.

This policy is reviewed annually or in the light of any incidents. We will also review it if the law or official guidance changes.

The policy was last reviewed in January 2026. The next review is due in January 2027.

17. Help from outside the company

You can get free, confidential advice from outside the company at any time:

- Acas (free advice on work problems): helpline 0300 123 1100, www.acas.org.uk
- Equality Advisory and Support Service (EASS) (free advice on discrimination and harassment): 0808 800 0082, www.equalityadvisoryservice.com
- Police: call 999 in an emergency, or 101 if it is not an emergency.
- Rape Crisis England and Wales (24-hour support line): 0808 500 2222, rapecrisis.org.uk

Using these services does not stop you raising a concern with us.