LONDON FIRE BRIGADE

Anti-sexual harassment policy

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Contents

1 Introduction 2
2 Duty to prevent sexual harassment 2
3 Scope 2
4 Definition 2
5 Examples of sexual harassment 3
6 Expectations of staff 4
7 Reporting 5
8 Investigation process 6
9 Disclosure of sensitive communications 7
10 Supporting people in speaking up about sexual harassment 7
11 Training and awareness 8
12 Monitoring and review 8
13 Records 9
14 Related policies 9
15 Help and support 9

Document history 10

1 Introduction

1.1 London Fire Brigade (LFB) is committed to providing an inclusive and respectful working environment in which all staff are treated with dignity and are free from sexual harassment and victimisation. Everyone should feel safe, supported, and able to reach their potential at work.

1.2 Sexual harassment is unlawful under the Equality Act 2010. The LFB operates a zero-tolerance approach to sexual harassment. Zero tolerance means that such behaviour is not acceptable and will be addressed consistently, fairly, and proportionately in line with the evidence and relevant procedures. It does not mean that every case will result in the same outcome.

1.3 This policy aligns with the Equality Act 2010 and reflects the Worker Protection (Amendment of Equality Act 2010) Act 2023, which places a duty on employers to take reasonable steps to prevent sexual harassment, including by third parties. The LFB takes this preventative duty seriously and is committed to taking proactive steps to prevent sexual harassment, promote a culture of dignity and respect, and provide a working environment in which concerns can be raised and addressed safely and appropriately.

1.4 This policy sets out the LFB's commitment to preventing sexual harassment, the standards of behaviour expected, and the framework for reporting and addressing concerns where they arise.

2 Duty to prevent sexual harassment

2.1 In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, the LFB has a duty to take reasonable steps to prevent sexual harassment in the workplace. To meet this duty, the LFB takes proactive and proportionate measures to prevent sexual harassment, promote a culture of dignity and respect, and identify and address risks where they arise. This includes:

- Providing regular training to employees and communicating this policy to ensure everyone understands the standards of behaviour expected and how to raise concerns.
- Promoting a culture of dignity, respect and inclusion.
- Identifying and addressing risks of sexual harassment and taking appropriate action to reduce those risks.

3 Scope

3.1 This policy applies to all employees, volunteers, contractors, agency workers, apprentices, probationers and any third parties interacting with the LFB. It applies to conduct in the workplace, during work-related activities or events, through work-related communications, including online, and to any other conduct with a sufficient connection to work that may affect the working environment.

4 Definition

4.1 Sexual harassment is defined under the Equality Act 2010 as unwanted conduct of a sexual nature which has the purpose or effect of violating an individual's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them.

4.2 In determining whether conduct amounts to sexual harassment, consideration will be given to the perception of the person affected, the other circumstances of the case, and whether it is reasonable for the conduct to have that effect. Context, proportionality, and the overall impact of the behaviour will always be taken into account.

4.3 Sexual harassment can be directed at any individual, regardless of their sex, sexual orientation or any other protected characteristic. It is a gender-neutral issue in law and may be perpetrated by any person against another.

4.4 Sexual harassment may occur:

- As a one-off incident or a pattern of behaviour.
- In person, in writing, online, or through digital communication.
- During work, work-related activities, training, social events, or any situation connected to the workplace.
- Between employees, contractors, members of the public, or other third parties.

4.5 A series of behaviours that may appear minor when viewed in isolation can, when taken together, amount to sexual harassment if they create an intimidating, hostile, degrading, humiliating, or offensive environment.

4.6 Sexual harassment does not need to be intentionally directed at a specific individual. For example, behaviour that is witnessed or overheard, such as displaying sexually explicit material in the workplace, may still constitute sexual harassment if it creates an offensive or degrading environment.

4.7 Behaviour described as '*banter*', jokes, or part of workplace culture may still amount to sexual harassment if it is unwanted and has the effect described above. The focus is on the impact of the conduct, not solely the intention behind it.

4.8 Conduct that may previously have been welcomed or tolerated may become unwanted over time. If such behaviour continues once it is or should reasonably be understood to be unwanted, it may constitute sexual harassment.

4.9 This policy recognises that experiences of sexual harassment can affect anyone. The LFB is committed to ensuring that all concerns are considered fairly, objectively, and in line with the Equality Act 2010 and relevant employment law principles.

5 Examples of sexual harassment

5.1 The following examples illustrate conduct that may amount to sexual harassment as defined in Section 4. The list is not exhaustive and will depend on the circumstances and impact of the behaviour.

Verbal conduct

- Sexual comments, jokes, or remarks about a person's body, appearance, clothing, or private life.
- Intrusive or unwanted questions about someone's sex life.
- Discussing one's own sex life in a way that creates discomfort.
- Sexual rumours about an individual.
- Catcalling, wolf-whistling, or sexual noises.
- Making promises of workplace advantage in return for sexual favours.

Nonverbal conduct

- Suggestive looks, staring, or leering.
- Displaying or sharing sexually explicit or pornographic material, including images, messages, or online content.
- Sexual gestures.

- Sending sexually explicit emails, messages, or social media communications.

Physical conduct

- Unwelcome touching, hugging, massaging, or kissing.
- Unwanted sexual advances or persistent propositions.
- Using seniority, authority or influence to pressure someone into unwanted personal or sexual interactions.
- Predatory or coercive behaviour.
- Repeated unwanted advances after boundaries have been set.
- Targeting individuals in a way that tests or pushes personal boundaries.
- Coercion, threats, or intimidation connected to sexual conduct.

Criminal conduct

5.2 Some forms of sexual harassment may also constitute criminal offences, including but not limited to sexual assault, stalking, grooming, indecent exposure, up-skirting, or rape. Such matters may be reported to the police in addition to being addressed under LFB procedures.

5.3 Sexual harassment may also arise from the conduct of third parties, including members of the public, contractors, visitors, or external partners. The LFB will take reasonable steps to address and manage such behaviour in line with this policy and relevant procedures.

6 Expectations of staff

6.1 The LFB will take reasonable and proportionate steps to prevent sexual harassment and respond appropriately where concerns arise. This includes:

- Implementing and communicating this policy across the organisation.
- Providing appropriate training and awareness for employees and managers.
- Maintaining clear, accessible, and trusted reporting routes.
- Responding to concerns promptly, fairly, and in line with relevant procedures.
- Considering welfare and support needs where issues are raised.
- Taking reasonable steps, within its control and contractual arrangements, to address harassment by third parties.

6.2 **Employee responsibilities**

All employees are expected to:

- Treat all individuals with dignity and respect, including employees, members of the public, contractors, and external partners.
- Not engage in any form of sexual harassment.
- Raise concerns if they experience sexual harassment or witness behaviour that may amount to sexual harassment.
- Cooperate honestly with any enquiries or investigations conducted in line with LFB procedures.

6.3 **Third-party behaviour**

Sexual harassment may arise from the conduct of third parties, including members of the public, contractors, visitors, and external partners.

Employees are encouraged to report third-party harassment that they experience or witness and will be supported in doing so. Where appropriate, the LFB will take reasonable steps to address

such behaviour, which may include raising concerns with external organisations, reviewing contractual expectations, or taking other proportionate action.

Where an employee is alleged to have sexually harassed a third party, the matter will be addressed in line with relevant LFB procedures, including the Discipline (Conduct) Procedure.

6.4 **Professional boundaries**

Employees must maintain appropriate professional boundaries when interacting with members of the public, service users, contractors, and external partners.

Employees must not misuse their role, authority, or access to information obtained through work to pursue personal relationships or contact outside professional duties.

Further practical guidance will be available on Hotwire.

6.5 **Standards of conduct**

All individuals engaging with the LFB are expected to adhere to professional standards of behaviour consistent with LFB values, dignity, respect, and equality.

The LFB will promote awareness of these standards through policy implementation, communication, and training, recognising that maintaining professional boundaries and respectful conduct is a shared responsibility across the organisation.

7 Reporting

7.1 Employees who experience, witness, or receive a disclosure of sexual harassment are encouraged to report the concern as soon as reasonably practicable. Reports can be made in person, in writing, or by email to a line manager, the Professional Standards Unit (PSU), or through the LFB's independent reporting channels available on Hotwire. Employees may choose the reporting route they feel most comfortable using.

7.2 All concerns will be taken seriously and handled sensitively, fairly, and in a timely manner. The LFB is committed to ensuring that individuals who raise concerns are treated with dignity and respect and are protected from victimisation, retaliation, or adverse treatment for reporting in good faith.

7.3 Information will be handled sensitively and shared only on a need-to-know basis in line with procedural fairness, safeguarding responsibilities, and legal obligations. Absolute confidentiality cannot always be guaranteed; however, the LFB will make every reasonable effort to protect the privacy and dignity of all parties involved.

7.4 Managers who receive a report or disclosure of sexual harassment must respond appropriately and seek advice without delay. This includes:

- Listening to the concern and taking it seriously.
- Maintaining appropriate confidentiality and not discussing the matter more widely than necessary.
- Avoiding any premature discussion with the person complained about or the wider team without advice.
- Seeking guidance from the PSU at the earliest opportunity.
- Considering immediate welfare and support needs of the person affected, including referral to appropriate support services such as Counselling and Trauma Service (C&T) where appropriate.

7.5 If you have experienced sexual assault or rape in the workplace or in connection with work, you may choose to report the matter to the police. This decision remains yours, and the LFB will support you in whatever choice you make.

7.6 There may be circumstances where the LFB has a legal or safeguarding obligation to report a matter to the police or other appropriate authorities. In such cases, the LFB will, where reasonably possible, explain this to you in advance and keep you informed of any steps taken.

7.7 Where there is a criminal investigation or police involvement, this may affect how and when the LFB progresses any internal process. For example, an internal investigation may be delayed, paused, or progressed in a way that ensures fairness, protects evidence, and avoids prejudicing external proceedings. The LFB will keep affected individuals appropriately informed throughout.

7.8 If you witness sexual harassment, you do not need the permission of the person affected to raise a concern. Where appropriate and safe to do so, individuals are encouraged to be supportive and sensitive to the person affected, recognising that experiences and preferences about reporting may differ.

7.9 Concerns may still be reported even if some time has passed since the incident occurred. All reports will be considered on their merits, although the availability of evidence and the passage of time may affect how the matter can be investigated.

7.10 Anonymous and third-party reports will be considered carefully and assessed in line with the same principles of fairness, proportionality, and evidence as any other concern. The LFB will take reasonable steps to review the information available while ensuring procedural fairness to all parties.

7.11 The LFB recognises that coming forward about sexual harassment can be difficult. Employees who raise concerns will be offered appropriate support, which may include signposting to counselling services, welfare support, and consideration of temporary workplace adjustments where appropriate.

7.12 Complaints made in good faith will not be treated as vexatious or malicious solely because they are not upheld.

Allegations of deliberately false or malicious complaints will only be considered where there is clear evidence of bad faith and will be addressed in line with the relevant disciplinary procedures.

8 Investigation process

8.1 All reports and complaints of sexual harassment will be taken seriously and handled promptly, sensitively, and in a fair and proportionate manner. The LFB will ensure that any concerns are assessed objectively and in accordance with the relevant policies and procedures.

8.2 Where appropriate, concerns relating to sexual harassment will be considered in line with Policy number 392 - Discipline Policy and other relevant LFB policies. This policy does not replace formal investigation procedures but provides the framework for reporting, support, and initial response.

8.3 Any investigation will be conducted in a fair, impartial, and thorough manner. Investigators will remain neutral, consider all available evidence, and ensure that both the person raising the concern, and the person complained about are treated with dignity and procedural fairness throughout the process.

8.4 As part of the investigation process, individuals involved will be given an appropriate opportunity to provide their account, evidence, and any relevant information. The impact of the alleged behaviour on the person affected will be considered alongside all other relevant factors.

8.5 The LFB recognises the sensitive nature of sexual harassment concerns. Investigations will be conducted with due regard to confidentiality, safeguarding considerations, and the wellbeing of all parties, while ensuring that information is shared on a need-to-know basis to allow a fair and lawful process.

8.6 Where the complaint relates to the conduct of a third party, the matter will be addressed in line with relevant contract management arrangements, organisational policies, and any applicable safeguarding or operational procedures.

8.7 Following the conclusion of an investigation, a recommendation will be made in accordance with Policy number 392 - Discipline (Conduct) policy. Any decision regarding next steps, including whether the matter proceeds to a formal hearing, will be made in line with established governance and decision-making processes.

8.8 Where appropriate, a range of outcomes may be considered. These may include informal management action, learning and development interventions, or formal disciplinary action, depending on the nature, seriousness, and evidence of the concern.

8.9 Informal action may be considered where it is proportionate and appropriate to do so, for example where behaviours can be addressed through clear expectations, guidance, and documented management action. Informal resolution will not be used where the seriousness of the allegation requires formal investigation.

8.10 Formal action may be initiated where:

- The nature of the allegation is serious.
- Informal measures are not appropriate or have not been effective.
- A formal complaint has been raised at the outset.
- The evidence indicates potential misconduct.

8.11 The LFB will keep employees who raise concerns appropriately informed of progress and key stages of the process, in line with legal and confidentiality requirements. While specific disciplinary outcomes are not normally disclosed, the LFB will ensure that appropriate action is taken, and that organisational learning is considered where necessary.

9 Disclosure of sensitive communications

9.1 We will handle sensitive communications with the utmost care. This includes:

- Maintaining the confidentiality of all parties involved.
- Ensuring that any sensitive information disclosed during the investigation is protected.
- Following legal guidelines on privilege and disclosure to ensure that sensitive communications are only shared with those who need to know.

10 Supporting people in speaking up about sexual harassment

10.1 We recognise the importance of supporting employees in speaking up about sexual harassment. The LFB is committed to creating and maintaining an open, respectful culture where individuals feel safe to raise concerns. To support this, we will:

- **Reduce psychological barriers:** Acknowledge the difficulty of speaking up and provide reassurance that reports will be taken seriously and handled with sensitivity.

- **Lessen social threats:** Make it clear that the intention of reporting is to improve the workplace environment, not to target individuals.
- **Provide clear reporting channels:** Ensure that people know how and where to report incidents, and that they can do so without fear of retaliation.
- **Offer support and resources:** Provide access to counselling and support services for those who report harassment.
- **Encourage a speak-up culture:** Regularly communicate the importance of speaking up and, if reasonably possible, provide training on how to do so effectively.

10.2 We will provide support to anyone affected by sexual harassment, including access to counselling services and adjustments to work arrangements if needed.

11 Training and awareness

11.1 The LFB is committed to taking proactive and reasonable steps to prevent sexual harassment in the workplace, in line with the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023. Training and awareness form a key part of this preventative approach.

11.2 All employees will receive appropriate training and awareness input to ensure they understand:

- What sexual harassment is and how it may present in the workplace.
- Expected standards of behaviour and professional conduct.
- How to raise concerns and access reporting routes.
- The importance of dignity, respect, and inclusive workplace culture.

11.3 Managers will receive additional training to support them in responding appropriately to disclosures and concerns relating to sexual harassment. This will include guidance on:

- Handling disclosures sensitively and appropriately.
- Maintaining confidentiality and protecting the dignity of all parties.
- Seeking timely advice from the Professional Standards Unit (PSU).
- Considering welfare and support needs, including signposting to appropriate services.
- Avoiding actions that could unintentionally compromise investigations or cause further harm.

11.4 Training will be delivered through a combination of mandatory and supplementary learning, briefings, and organisational communications, as determined by the LFB's training and organisational development arrangements. The LFB will take reasonable steps to ensure that staff are aware of this policy and their responsibilities under it.

11.5 Targeted training and guidance may also be provided for specific roles, including managers, investigators, and those responsible for handling complaints, to ensure consistent, fair, and trauma-informed responses to sexual harassment concerns.

11.6 The LFB will periodically review training content and delivery to ensure it remains aligned with current legislation, ACAS guidance, organisational learning, and best practice in preventing harassment and supporting those affected.

11.7 As part of promoting a speak-up culture, the LFB will continue to raise awareness through internal communications, guidance materials, and accessible resources to support understanding of reporting routes, expectations, and available support.

12 Monitoring and review

12.1 This policy will be reviewed annually to ensure its effectiveness and compliance with current legislation. Feedback from employees will be considered in these reviews.

12.2 The LFB will keep centralised, confidential records of all concerns raised, formal and informal, including no case to answer. This enables trends to be identified and appropriate action to be taken where necessary.

12.3 As part of the LFB's commitment to continuous learning, a review will be completed following the conclusion of the full internal disciplinary process.

13 Records

13.1 Please send records by email to RecordsServices@london-fire.gov.uk. Records will be kept on your electronic personal record file (e-prf) and retained in accordance with Policy number 788 - Electronic personal record file. Personal data shall be managed in accordance with Policy number 351 – Data protection and privacy policy.

14 Related policies

14.1 This policy should be read in conjunction with:

- Policy number 392 - Discipline policy
- Policy number 394 - Grievance policy

15 Help and support

15.1 Please contact the HR Helpdesk on extension 89100 option 3 and by email to IT.HR@london-fire.gov.uk or Payroll by email to payforms@london-fire.gov.uk.

15.2 Please visit the Counselling and Trauma Service (CTS) Hotwire page to find out more about the support they can provide you. They can be contacted by email to counselling@london-fire.gov.uk or on extension 35555.

15.3 The LFB has Equality Support Groups that can support you, please see Hotwire for further details about them.

15.4 External support:

- https://www.victimsupport.org.uk/
- https://thesurvivorstrust.org/
- https://rapecrisis.org.uk/
- https://www.survivorsuk.org/ for men and non-binary people
- https://www.rightsofwomen.org.uk/sexual-harassment-at-work-advice for women
- http://www.galop.org.uk/ for LGBT+

15.5 This policy may also be available on request in other accessible alternative formats as set out in Policy number 290 - Guidance note on translation and interpretation. Please contact Communications on extension 30753 and by email to communications.team@london-fire.gov.uk.

15.6 The LFB invites your engagement so that it can learn so if you have a suggestion that can improve this policy then please submit your idea via the Staff Suggestion Scheme on Hotwire as set out in Policy number 887 – Staff suggestion scheme. Any changes do need to go through the agreed engagement, consultation, negotiation or governance requirements.

Document history

Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	26/01/26	SDIA	L – 15/01/26	HSWIA	20/01/26	RA	NA

Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
Sections 1–10	Policy updated following further stakeholder and trade union consultation. Amendments include clarification of the preventative duty, scope, examples of sexual harassment, employee and third-party expectations, professional boundaries, reporting arrangements and investigation provisions.	August 2026

Subject list

You can find this policy under the following subjects.

Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

Considered by: (responsible work team)	**FOIA exemption**	**Security marking classification**