



SAMPLE SEXUAL HARASSMENT POLICY

This is a sample best practice sexual harassment policy for media organisations who currently do not have a stand-alone sexual harassment policy or need to improve their existing one. This policy draws on a number of sexual harassment policies from organisations in the industry, including the ILO's Sample Sexual Harassment Policy, and Norwegian media company VG's own sexual harassment procedures.

You will need to tailor this policy to your organisation. It will need to be drafted, or at least checked, by a lawyer with expertise in employment and discrimination laws in your country.

The details of the policy will depend on a several factors including:

- Your country's laws on the issue
- The size of your organisation and resources available
- Your organisation's existing policies and procedures, in particular grievance and disciplinary.

Under each clause there are notes about the clause as well as some example text.

[INSERT COMPANY NAME] Sexual Harassment Policy and Procedures

FOREWORD

This is where you should state that you have a zero-tolerance policy towards sexual harassment and are committed to providing a safe working environment for your employees.

You can also include details about:

- Why you are introducing this policy
- Who the policy is for
- Who your organisation's 'point person' is
- Who approved the policy
- When it was approved and will be reviewed.

[INSERT COMPANY NAME] is committed to providing a safe environment for all employees free from discrimination on any grounds including sexual harassment at work.

Sexual harassment is any unwanted and offensive behaviour of a sexual nature that violates a person's dignity and makes them feel degraded, humiliated, intimidated or threatened.

[INSERT COMPANY NAME] has a zero tolerance policy on any form of sexual harassment and assault in the workplace.

[INSERT COMPANY NAME] will ensure that all managers and employees know about and have ready access to the policy at all times and are familiar with its contents.

This policy outlines clear procedures for:

- a. Employees who have been sexually harassed
- b. Employees accused of sexual harassment
- c. Witnesses of sexual harassment
- d. Managers and senior staff involved in investigating sexual harassment cases.

[INSERT COMPANY NAME]'s [Chief Operating Officer/Head of Human Resources/Insert Other] is responsible for the content and implementation of this sexual harassment policy. They are also the lead person on all cases related to sexual harassment in [INSERT COMPANY NAME].

This policy is approved by [INSERT COMPANY NAME]'s senior management.

Name	[INSERT NAME]
Title	[INSERT JOB TITLE]
Approved	[INSERT DATE]
Reviewed	[INSERT DATE]
Next review	[INSERT DATE]

This section should spell out, in very practical terms, what this policy means for your employees. It is particularly helpful to include this section in policy documents with lots of legal language.

A NOTE FOR EMPLOYEES

Here are some practical guidelines for [INSERT COMPANY NAME] employees on what you can and should do if:

- a. You are sexually harassed at work
- b. You a witness or concerned about someone else being sexually harassed at work
- c. You are accused of sexually harassing someone at work.

These guidelines are extracted from the various sections and clauses within the policy itself.

EMPLOYEES WHO HAVE BEEN SEXUALLY HARASSED AT WORK

- If you have been sexually harassed it is NOT your fault.
- You are not alone, nor the only person that this has happened to. Sexual harassment does happen in the media industry.
- You have a legal right to work in a safe environment without being subjected to sexual harassment or frightened of it. It is [INSERT COMPANY NAME]'s responsibility to make this happen.
- To be able to do anything about sexual harassment, [INSERT COMPANY NAME] is completely dependent on being informed.
- You need to inform another person with responsibility about the incident. This could be:
 - Your immediate manager
 - Another manager at [INSERT COMPANY NAME] S
Someone in human resources
 - A health and safety officer
 - Your trade union representative
 - Occupational health services.
- All of these people have a duty to protect your confidentiality.
- As someone reporting sexual harassment, your identity and any information you share will be treated in confidence and will only be shared with a small number of people involved in the investigation.
- If you have been sexually assaulted or raped this is a serious crime against you. As well as informing [INSERT COMPANY NAME] you should report it to the police and seek medical attention. Be aware that your case might go to a criminal court or tribunal.
- You have the right not to be victimised for reporting sexual harassment at work. Retaliation is a serious and punishable offence and it is [INSERT COMPANY NAME]'s responsibility to protect you from this.
- [INSERT COMPANY NAME] has both formal and informal procedures in place to deal with cases of sexual harassment. You will find these in the policy below.

WITNESSES OR EMPLOYEES CONCERNED ABOUT SOMEONE ELSE BEING SEXUALLY HARASSED AT WORK

- To be able to do anything about sexual harassment, [INSERT COMPANY NAME] is completely dependent on being informed.
- If a colleague contacts you and reports being sexually harassed, you must encourage the person to take the matter further and to report it.
- If you are worried that a colleague is being sexually harassed, you should report this to one of the people mentioned above.
- As someone reporting sexual harassment, your identity and the information you share will be treated in confidence and will only be shared with a small number of people involved in the investigation.
- You have the right not to be victimised for reporting sexual harassment at work. Retaliation is a serious and punishable offence and it is [INSERT COMPANY NAME]'s responsibility to protect you from this.

EMPLOYEES ACCUSED OF SEXUAL HARASSMENT AT WORK

If you are being accused of sexual harassment you also have rights.

- Your identity and any information about the case will be treated in confidence.
- You have the right to know the case being made against you.
- You have the right to respond to any accusations made against you.
- You have the right to due consideration of your version of events.
- You have the right to appeal a decision.
- If [INSERTCOMPANYNAME] finds that there is no sexual harassment case against you, or the case is dropped, then any documents relating to the case will be destroyed and will not appear in your employment records. It will not affect your current or future employment prospects.
- If [INSERT COMPANY NAME] finds that there is a sexual harassment case against you, you will be disciplined. The minimum discipline is a written warning. The discipline for serious or repeated cases is termination of employment.
- Rape and sexual assault are criminal offences and will be referred to the police.

1. LEGAL BASIS FOR THE POLICY

You need to specify what the legal basis for this policy is, if any.

Refer to any country laws or policies (and sections /articles within them) on:

- Rape and sexual assault
- Sexual harassment
- Sexual harassment in the workplace
- Discrimination and equality
- Data protection and privacy laws (as you will be dealing with sensitive information that could affect a person's reputation).

You will need to consult a lawyer on this section in particular.

2. PARTIES GOVERNED BY THE POLICY?

This is where you state whom this policy applies to. There is a wide range of actors involved in creating media content and with whom your staff will come into contact. You need to ensure that you capture them all in this clause and that the language is legally appropriate.

This policy governs all [INSERT COMPANY NAME]'s employees, including directors, board members, managers, staff, freelancers and contractors. It also governs anyone who comes into contact with ORGANISATION X's employees in the process of creating media content, including news sources, interviewees, advertisers, business associates and visitors.

3. PARTIES GOVERNED BY THE POLICY?

The implementation of the policy is as important as the policy itself. Here, you need to explain how you will ensure that all staff know about the policy and are familiar with its content.

This policy will be widely disseminated internally. [INSERT COMPANY NAME] will ensure that all managers and employees know about and have ready access to the policy at all times.

The policy will be included or referred to in the following [INSERT COMPANY NAME] documents:

This list needs to be based on your organisation's existing policies, documents and contracts including:

- Code of ethics
- Staff handbook
- Employment contracts
- Consultant or associate contracts
- Any other collective bargaining agreements/contracts

The policy will be reviewed on an annual basis.

All employees and managers will be trained on the content in this policy:

- a. as part of their induction into the organisation
- b. when the policy is reviewed and changes are made

4. DEFINITIONS OF TERMS

You will need to define what sexual harassment at work is. It is also helpful to give examples of what counts as unwanted sexual behaviour. It is important to emphasise that, no matter what the intention, it is the person on the receiving end of the behaviour who decides if it is unwanted.

4.1 SEXUAL HARASSMENT

Sexual harassment is any unwanted and offensive behaviour of a sexual nature that violates a person's dignity and makes them feel degraded, humiliated, intimidated or threatened.

It is the person on the receiving end of the behaviour who decides whether or not it is unwanted or offensive. This is regardless of the intention of the person accused of harassment.

Sexual harassment can be on-going or a onetime occurrence.

Sexual harassment can be:

Physical – someone uses physical pressure or force to have sexual contact with another person against their will.

Verbal - someone gives another person unwanted sexual attention through verbal or written comments or conversation.

Non-verbal – someone gives another person unwanted sexual attention through noises or actions at a distance.

You might also want to consider defining categories of sexual harassment including:

a. *Hostile work environment: When someone's speech or behaviour is so severe that the person being harassed feels that their work environment is hostile, unpleasant, intimidating, threatening or unsafe. It doesn't have to be directed at an individual. It may be offensive to someone who is witness to the behaviour, so creating an oppressive atmosphere for one or more people, such as:*

- watching pornography
- putting up offensive posters or calendars
- workplace 'banter' (light conversation) and jokes of a sexist nature

b. *Quid pro quo: When a person is forced to submit to sexual harassment in return for employment benefits such as promotion, a pay raise, a big assignment, keeping their job; or when a person's employment is affected when they reject or stand up to sexual harassment, such as being fired, demoted, or losing assignments.*

4.2 BEHAVIOURS THAT COUNT AS SEXUAL HARASSMENT

Behaviours that count as sexual harassment include but are not limited to:

Physical

- Actual or attempted sexual assault – a physical attack of a sexual nature, which includes sexual touching or rape
- Kissing someone without permission
- Unwanted touching, groping, fondling of someone's private parts
- Unwelcome touching or stroking of someone's body
- Unwelcome neck massage
- Unwelcome holding of someone's hand
- Unwanted requests for sexual favours.

Verbal

- Unwanted texts, emails, letters, telephone calls or materials of a sexual nature
- Sexually suggestive remarks

- Repeated and unwanted social invitations for dates or physical intimacy
- Making personal and intrusive comments about someone's dress and physical appearance
- Making kissing sounds, howling and smacking of lips
- Catcalling (sexually suggestive whistling)
- Unwanted personal questions about social or sexual life/history
- Unwanted questions about sexual fantasies
- Unsolicited jokes that are sexual in nature
- Unsolicited sexual innuendos or stories
- Circulating innuendos or 'dirty' jokes via email or social media.

Non-Verbal

- Repeated invasion of personal space
- Looking someone up and down (elevator eyes)
- Staring or 'leering'
- Sexual gestures with body
- Facial expressions such as winking, licking lips, throwing kisses
- Stalking someone or following them around
- Purposefully blocking someone's path
- Unwanted personal gifts
- Displaying sexually explicit posters, calendars or objects
- Publicly watching pornography.

4.3 WORK PLACE

The 'workplace' is any space where an employee carries out their work for [INSERT COMPANY NAME]. This includes:

- On-site spaces: in the office, newsroom or on set
- Off-site spaces: in the field doing research and interviews
- Online spaces: any digital platform used by employees to communicate with others in relation to their work
- Work-related events: conferences, business trips, training sessions
- Social events organised by [INSERT COMPANY NAME].

5. RELATED POLICIES

You may want to consider drawing up policies for situations with potential to lead to sexual harassment. These include policies on relationships between employees and also social events and alcohol. As examples:

5.1 [INSERT COMPANY NAME] GUIDELINES FOR FRATERNISATION

Where a romantically involved couple is employed by [INSERT COMPANY NAME], they may not be employed in roles that report directly to each other. Any employee in a relationship with a subordinate, should report this to their manager immediately.

5.2 [INSERT COMPANY NAME] GUIDELINES FOR SOCIAL EVENTS AND ALCOHOL

Sexual harassment happens more frequently in situations involving alcohol or drugs. At work-related social events alcohol should be consumed in moderation and responsibly. The use of drugs and other illegal substances at workplace social events is strictly prohibited.

6. CONFIDENTIALITY

Confidentiality is an ethical principle that prevents information and identities from being shared or discussed with third parties. Confidentiality in sexual harassment cases not only builds trust, it is also a legal obligation in most countries and a professional code of ethics.

[INSERT COMPANY NAME] will treat the people involved and all information shared in sexual harassment cases with confidentiality. This means that the identities of those involved – including the person being harassed, the accused and any witnesses – will be protected and will be processed in compliance with national data protection laws. Also, any information, records and evidence about the case will be stored securely and only shared with those involved in the investigation.

7. SEXUAL ASSAULT AS A CRIMINAL OFFENCE

Sexual assault is a criminal offence in most countries and cases should be reported to the police immediately.

Sexual assault, including rape, is a serious and criminal offence. [INSERT COMPANY NAME] will report any case of sexual assault to the police immediately and will comply with any related police investigation. [INSERT COMPANY NAME] reserves the right to suspend with pay any employee accused of sexual assault until the police investigation is complete or there is a court verdict.

8. RIGHTS AND RESPONSIBILITIES

8.1 EMPLOYEE RIGHTS

Your employees have a number of rights which they need to know about.

[INSERT COMPANY NAME] will treat all sexual harassment cases fairly and consistently with due respect for the rights of all employees involved. All employees have the following rights:

- The right to work in an environment free from discrimination of any kind, including sexual harassment
- The right to report if they or someone else has been sexually harassed at work
- The right to anonymity
- The right to confidentiality
- The right to know the case against them if they are being accused (as long as this does not affect confidentiality rights)
- The right to reply with their version of events
- The right to due consideration of their version of events
- The right to representation
- The right to appeal
- The right to have all documents related to their case destroyed and deleted from their employment record if no case was found
- The right to take their case to a court or tribunal if not satisfied with the outcome of the investigation.

8.2 MANAGER RESPONSIBILITIES

Your managers are representatives of the organisation and any failure on their part is a failure on the part of your organisation. You need to clearly stipulate managers' duties and responsibilities in preventing and investigating sexual harassment at work.

As representatives of [INSERT COMPANY NAME], managers should do all in their power to:

- Prevent and identify unacceptable sexual behaviour from happening
- Prevent behaviour that is creating a hostile work environment for employees
- Adhere to this policy and other related policies and procedures
- Ensure that all parties fully understand their rights under this policy
- Ensure that all parties fully understand [INSERT COMPANY NAME]'s complaints procedures and the potential outcomes and disciplinary measures
- Ensure all sexual harassment cases are investigated thoroughly and consistently
- Provide all parties with feedback
- Provide all parties with the necessary follow-up and support
- Avoid discrimination on any grounds.

Breaches of rules and regulations by managers will result in a formal disciplinary procedure.

9. COMPLAINTS PROCEDURES

Your organisation's complaints procedure needs to be laid out in detail. A step-by-step approach is best. This is important for employees as well as managers so that there is no confusion about what is involved.

All employees have the right to report if they have been sexually harassed at work, or if they have witnessed someone else being sexually harassed at work. All reports will be taken seriously and will be dealt with sensitively and in a consistent and fair manner, respecting the rights of all parties involved. In some circumstances, it may be necessary to bring in external assistance or expertise to ensure a fair, impartial and objective investigation.

Sexual harassment can be reported using either the informal or formal procedures outlined in this policy.

A disclosure about sexual harassment can be made anonymously using [INSERT COMPANY NAME]'s whistleblowing mechanism [if this exists], however, a proper investigation will require the identities of all parties to be known.

9.1 WHO CAN MAKE A SEXUAL HARASSMENT COMPLAINT?

All employees have a right to make a complaint if they or someone else is being sexually harassed at work.

Sexual harassment can be reported by

- 1. The person who has been sexually harassed**
- 2. A witness to sexual harassment.**

You are not obliged to confront the person you are accusing of harassment. Only confront the person you are accusing if you feel able to and if they do not pose a risk to your own or anyone else's physical safety.

If you have witnessed or are concerned that another employee is being sexually harassed, encourage them to report the case themselves either formally or informally.

9.2. WHO HANDLES SEXUAL HARASSMENT COMPLAINTS?

PERSON X is the designated person in [INSERT COMPANY NAME] for dealing with sexual harassment cases.

An employee does not have to make their initial complaint to PERSON X. They can make a complaint to any person with responsibility in [INSERT COMPANY NAME], including:

- An immediate manager
- Another manager at [INSERT COMPANY NAME]
- Someone in the HR department
- A health and safety officer
- A trade union representative
- The occupational health service.

This person, however, has a duty to refer the complaint to PERSON X.

When an appeal is made, this is dealt with and a final decision made by [INSERT COMPANY NAME]'s Chief Executive Officer (or alternative).

9.3. INFORMAL COMPLAINTS

An informal complaint does not involve any disciplinary measures.

Step 1 – Informal sexual harassment complaint made

- A verbal or written informal complaint is made about sexual harassment experienced at [INSERT COMPANY NAME].
- The complaint is made to a person with responsibility in [INSERT COMPANY NAME] (defined above).
- Whoever receives the complaint informs PERSON X, who is the designated person for sexual harassment cases at [INSERT COMPANY NAME].

Step 2 – Informal complaint received

PERSON X contacts or calls a meeting with the person making the complaint and:

- If the complaint was verbal, PERSON X will make a written note of the complaint and share a copy with the person making the complaint
- Informs them of their rights, the process going forward and answers any questions
- Explains about confidentiality and what it means for them and the person they are accusing
- Discusses the various methods for coming to a resolution as part of the informal process
- Explains the potential resolutions in an informal process
- Explains what support is available to them and ascertains what support they might want or need
- Explains that if they are not satisfied with the outcome of the informal complaint then they may make a formal complaint.
- Puts the above in writing.

PERSON X contacts or calls a meeting with the person accused of sexual harassment and:

- Informs them about the case against them
- Informs them of their rights (including their right to respond) and the process going forward and answers any questions
- Explains about confidentiality and what it means for them and the person who is accusing them

- Discusses the various methods for coming to a resolution as part of the informal process
- Explains the potential resolutions in an informal process
- Explains [INSERT COMPANY NAME]'s policy on retaliation or victimisation of anyone making a sexual harassment complaint
- Puts the above in writing.

A small number of senior management are informed about the case (*defining who these people are is important*).

Step 3 – Resolution

The person accused of sexual harassment is given 1 week to respond in writing with their version of events.

A method for coming to a resolution is agreed upon with both parties including:

- Facilitation
- Conciliation
- Mediation
- Arbitration.

A resolution is agreed on. Resolutions will depend on the case but could include:

- The promise to end sexually harassing behaviour
- A formal apology from the harasser
- Transfers between teams
- Training and sensitisation for the harasser.
- Confidentiality of all parties is safeguarded.
- An informal complaint does NOT involve any disciplinary measures.

Step 4 – Follow-up & support

- PERSON X will systematically follow up with both parties to ensure that the sexual harassment has stopped and that both parties are not being adversely affected in the aftermath.
- PERSON X will conduct follow – up meetings with the line managers of parties involved in the complaint.
- PERSON X will continue to assess the need for support
- If the person being harassed is not satisfied with the outcome of the informal complaints procedure, they can make a formal complaint.

9.4. FORMAL COMPLAINTS

Step 1 – Formal sexual harassment complaint made

- A verbal or written formal complaint is made about sexual harassment experienced at [INSERT COMPANY NAME]
- The complaint is made to a person with responsibility in [INSERT COMPANY NAME] (defined above)
- Whoever receives the complaint informs PERSON X, who is the designated person for sexual harassment cases at [INSERT COMPANY NAME].

Step 2 – Formal complaint received

If the complaint made is about sexual assault, then PERSON X will report the case directly to the police (see x. Sexual Assault).

PERSON X contacts or calls a meeting with the person making the complaint

- If the complaint was verbal, PERSON X will make a written note of the complaint and share a copy with the person making the complaint

- Informs them of their rights, the process going forward and answers any questions
- Explains about confidentiality and what it means for them and the person they are accusing
- Explains what the potential professional and legal consequences will be for the person they are accusing, if a case is found
- Explains what support is available to them and ascertains what support they might want or need
- Puts the above in writing.

PERSON X contacts or calls a meeting with the person accused of sexual harassment and:

- Informs them about the case against them
- Informs them of their rights (including their right to respond) and the process going forward and answers any questions
- Explains about confidentiality and what it means for them and the person who is accusing them
- Explains what the potential professional and legal consequences will be for them, if a case is found
- Explains [INSERT COMPANY NAME]'s policy on retaliation or victimisation of anyone making a complaint about sexual harassment
- Puts the above in writing.

A sexual harassment case file is opened.

A small number of senior management are informed about the case (defining who these people are is important).

Step 3 – Investigation

Interviews are conducted with:

- The person being sexually harassed
- The person being accused of sexual harassment (satisfying their right to reply)
- Any witnesses or third parties.
- Two people, including PERSON X, will represent [INSERT COMPANY NAME] in any meeting or interview.

Formal written statements are taken from

- The person being sexually harassed
- The person being accused of sexual harassment (satisfying their right to reply)
- Any witnesses or third parties.

The facts of the case are compiled, including diaries and evidence collated by the person being sexually harassed and any counter evidence from the person being accused.

A confidential record is kept of all information relating to the case, including all discussions and communication with all parties.

Confidentiality of all parties is safeguarded.

Step 4 – Decision

- [INSERT COMPANY NAME] decides whether or not sexual harassment has happened, based on the facts and evidence compiled.
- [INSERT COMPANY NAME] decides on what disciplinary measures are to be taken if any.
- A legal basis for the decision will be specified
- [INSERT COMPANY NAME] will assess the need for legal support
- Both parties are given the opportunity to appeal within X

days (see 10. Appeals)

- If no case is found, all documents relating to the case will be destroyed. However, an internal record that an investigation was carried out will be kept.

Step 5 – Feedback

- Feedback is given to the parties involved in the case while ensuring that confidentiality is safeguarded.
- Both parties are given the opportunity to appeal within X days (see 10. Appeals).
- If no case is found, all documents relating to the case will be destroyed. However, an internal record that an investigation was carried out will be kept.
- If a case is found, [INSERT COMPANY NAME] will produce a report detailing the investigations, findings, outcomes, and disciplinary measures taken.
- [INSERT COMPANY NAME] will detail an appropriate plan for follow-up and support, regardless of whether a case was found or not.

Step 6 – Follow-up & support

- PERSON X will systematically follow up with both parties to ensure that the sexual harassment has stopped and that both parties are not being adversely affected in the aftermath.
- PERSON X will also conduct follow-up meetings with line managers.
- PERSON X will continue to assess the need for support.

10. APPEALS

All employees have the right to appeal against a decision so there needs to be a clear procedure for this. You will need to decide who in your organisation deals with appeals and makes final decisions.

If not satisfied, both parties have the right to appeal against the outcome of the formal complaints procedure. Any appeal needs to be made in writing to [INSERT COMPANY NAME]'s Chief Executive Officer (or appropriate alternative) within seven days (or appropriate time period) of the outcome and should contain the reason for the appeal.

An appeal must be based on the following conditions:

- Errors in interpretation or implementation of procedures that undermine a fair hearing
- When new and significant evidence not considered in the initial investigation comes to light
- Lack of substantial evidence to support the decision.

[INSERT COMPANY NAME] will issue a response to the request within 7 days (or appropriate time period) of receiving the request.

[INSERT COMPANY NAME]'s Chief Executive Officer (or appropriate alternative) may hold, change, or overturn the original outcome of the disciplinary committee or grant a hearing. This decision is final and no further appeal can be made.

11. SUSPENSION

In more serious cases of sexual harassment, including sexual assault it may be necessary to suspend employees while you (or the police) complete their investigation. It is important to emphasise that this is a practical measure and not a disciplinary one.

In some situations, it may be necessary to suspend employees on full pay whilst an investigation is ongoing. This is to ensure that all employees are protected, and that the investigation can be properly conducted. Suspension on pay is not a disciplinary procedure. [INSERT COMPANY NAME] reserves the right to suspend an employee on full pay pending completion of the investigation or any disciplinary action.

12. OUTCOMES AND DISCIPLINARY MEASURES

This clause on outcomes and disciplinary measures needs to reflect your organisation's existing grievance and disciplinary policy. It should list the potential outcomes of an investigation as well as the range of disciplinary measures that your organisation can take. You will need to explain that disciplinary action will be based on a case-by-case approach, but that they will be applied consistently to all cases.

[INSERT COMPANY NAME] recognises three potential outcomes of any formal investigation into sexual harassment:

- 1. No case of sexual harassment found**
- 2. A clear case of sexual harassment found**
- 3. A clear case of serious or repeated sexual harassment found.**

Anyone found to have sexually harassed someone at work, irrespective of their position in [INSERT COMPANY NAME], will face any of the following disciplinary measures:

- Verbal or written warning
- Adverse performance evaluation
- Transfer
- Demotion
- Suspension
- Dismissal.

The nature of the disciplinary measure will depend on the gravity and extent of the harassment in each case. However, these measures will be applied consistently across all sexual harassment cases. Serious cases will result in immediate dismissal of the accused. Any disciplinary measures taken will appear in the accused's employment records.

13. RETALIATION AND PREVENTION OF VICTIMISATION

It is important to protect your employees from being victimised for reporting sexual harassment.

No employee will be victimised for reporting sexual harassment in good faith or for acting in good faith as a witness in an investigation. [INSERT COMPANY NAME] regards retaliation as a serious violation of this policy and any incidents should be reported immediately. Any person found guilty of retaliation on a reported case of sexual harassment will be subject to disciplinary action, up to and including dismissal, in accordance with [INSERT COMPANY NAME]'s disciplinary policy and procedures.

14. FALSE CLAIMS

Unfortunately false claims, whether accidental or malicious, do sometimes happen. Towing a hard line on false claims will help to prevent them from happening.

A false claim is when an employee reports an incident sexual harassment in the knowledge that the allegations are untrue. [INSERT COMPANY NAME] will always conduct a proper investigation into claims and gathering of evidence will be fair, objective and thorough. Making a false claim is a serious offence and any employee found to be making a false sexual harassment claim will be subject to disciplinary action, up to and including dismissal, in accordance with [INSERT COMPANY NAME]'s disciplinary policy and procedures.

15. SUPPORT

Sexual harassment has profound and long-lasting effects on the individual. It is important to stipulate how your organisation can help support an employee who has been sexually harassed at work, or who has had a false claim made against them. This will of course depend on the resources your organization has available.

[INSERT COMPANY NAME] will always seek to ascertain whether and what support an employee who has been sexually harassed, or an employee who has had a false sexual harassment claim made against them, needs or wants. [INSERT COMPANY NAME] can provide support through the following:

- Paid/unpaid leave
- Part-time / shorter hours
- Shared work load
- Working from home
- Mentoring/counseling
- Back to work strategy/support
- Systematic follow-up.

[INSERT COMPANY NAME] also has a directory of support services for employees who have been sexually harassed at work, which all employees can access.

Or if you have the available resources:

[INSERT COMPANY NAME] will also consider, on a case-by-case basis, covering the costs of support services for employees who have been sexually harassed at work.