

Sexual Harassment Policy (ROI)

Contents

1. Introduction.....	2
Top Takeaways.....	2
2. What is sexual harassment and victimisation?.....	2
3. Third-party harassment.....	3
4. Consequences of sexual harassment and victimisation.....	4
5. How can we prevent sexual harassment?.....	4
6. What to do if you're concerned about sexual harassment or victimisation?.....	5
6.1. Informal vs. formal complaints.....	6
6.2. What if I witness sexual harassment or victimisation?.....	6
6.3. Requests from colleagues not to take action.....	6
7. Investigating concerns.....	7
7.1. Action following investigations.....	7
7.2. Record-keeping.....	8
8. Where can I go for additional support?.....	8
9. Document retention.....	9
10. Document Control Details.....	9

1. Introduction

Currys is committed to providing a working environment that's free from sexual harassment.

We're all responsible for ensuring our behaviour towards our colleagues, customers, and suppliers reflects our values, and that we each contribute to maintaining an environment where everyone's treated with dignity and respect at work.

If you see or experience behaviours that are unacceptable, any actions that make you or others uncomfortable, or you're unclear where the boundaries lie, it's important to speak up.

This policy applies to all Currys colleagues, officers, consultants, self-employed contractors, casual workers, agency workers, apprentices, volunteers, interns, work experience colleagues, job applicants and former colleagues, within the ROI.

You should read this policy in conjunction with the [Dignity at Work Policy \(UK&ROI\)](#).

Top Takeaways

- Currys has a zero-tolerance attitude towards sexual harassment.
- Sexual harassment and victimisation are unlawful and will not be tolerated.
- We expect you to model our values and standards of behaviour and report any incidents when these values and standards aren't being followed.
- We all have a role to play in preventing sexual harassment of colleagues during their employment.
- Please tell us if something isn't right as soon as you can so Currys can take appropriate action. You should speak to your line manager or someone appropriate that you trust at work in the first instance. You can also contact the Employee Relations (ER) team by email to ERHub@currys.co.uk or if you need to take a more formal route, we have a [Grievance Policy \(UK&ROI\)](#) and [Group Whistleblowing Policy](#).
- Sexual harassment can result in legal liability for both Currys and the harasser.
- Sexual harassment and victimisation may result in disciplinary action, up to and including dismissal.

2. What is sexual harassment and victimisation?

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, and creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Victimisation is treating someone badly, retaliating or penalising them because they've complained, it's believed they have or will complain, or they've helped someone else who's complained about discrimination or harassment.

Sexual harassment doesn't have to be physical; it could be spoken or written words, images, physical gestures, or inappropriate contact. It's important to understand that it's the effect of the conduct that matters, regardless of whether or not it was intended and that a single incident can amount to sexual harassment.

It's also important to bear in mind that sexual harassment covers a very broad spectrum of behaviour and may not always appear to be overtly sexual in nature but can include (this list isn't exhaustive):

- Using overly familiar language to refer to others.
- Telling a sexist joke.
- Making sexual comments or innuendos either to a person or around them.
- Asking personal questions about someone's private life or about their sexual preferences or fantasies.
- Discussing your own sex life.
- Propositions and sexual advances.
- Offensive words or comments, wolf whistling or cat calling.
- Looking someone up and down in a suggestive manner, staring or leering.
- Following someone or online stalking.
- Giving unwanted personal gifts.
- Making promises in return for sexual favours.
- Unwanted sexual attention whether verbal or physical.
- Making sexual gestures, such as simulating sexual acts.
- Standing close or brushing up against someone.
- Unwelcome touching, hugging, patting, kissing or stroking.
- Spreading sexual rumours about someone.
- Sharing, sending, or showing inappropriate personal images of yourself to someone.
- Sharing, sending, or showing, printed or digital images of a sexual nature with others.
- Inappropriate conversations about someone through email, Workchat, text or messaging apps.
- Sexual posts or contact on social media.
- Sending messages of a sexual or explicit nature through email, Workchat, text or messaging apps.
- Coercing someone into sexual relations through pressure, manipulation or threats, or offering rewards in exchange for sex.
- Engaging in or attempting to engage in sexual activity with someone without their consent.
- Sexual violence, including rape or attempted rape.
- Threatening to carry out sexual violence or unwanted sexual acts.

It also includes treating someone less favourably because they've submitted or refused to submit to unwanted conduct of a sexual nature, in the past.

Sexual harassment can be experienced by any one of us, regardless of gender, seniority, sexuality, age or any other trait. It doesn't always occur in plain sight, it can happen in-person and online, outside of, as well as during working hours. A person may also be sexually harassed even if they weren't the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

3. Third-party harassment

Third-party harassment is where a colleague is harassed or sexually harassed by someone they've come into contact with at work, that doesn't work for Currys.

Third-party harassment could include unwelcome sexual advances from a client, customer or supplier visiting one of our sites or stores, or could occur where a colleague is visiting a client,

customer or supplier's premises or other location in the course of their employment. Third-party harassment can take many forms, such as verbal or physical abuse or bullying.

Third party harassment won't be tolerated. You're encouraged to report any third-party harassment whether it's directed towards you or if you witness any inappropriate behaviour by a third-party towards a Currys colleague.

If you experience such behaviour, please speak to your line manager or someone appropriate that you trust at work, right away. You can also contact the Employee Relations team by email to ERHub@currys.co.uk or if you need to take a more formal route, we have a [Grievance Policy \(UK&ROI\)](#) and [Group Whistleblowing Policy](#). We'll take steps to deal with any complaints and to prevent it happening again. These may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other areas of the business.

We'll also take active steps to try to protect our colleagues and prevent third-party sexual harassment, such as our warning notice posters displayed in store.

Any sexual harassment by colleagues against a third-party may lead to disciplinary action up to and including dismissal.

4. Consequences of sexual harassment and victimisation

Regardless of when, where and how it occurs, Currys will consider any sexual harassment involving colleagues as a workplace issue and will act in line with our disciplinary policy.

Sexual harassment and victimisation are unlawful and will not be tolerated. They may lead to disciplinary action up to and including dismissal if they're committed:

- In a work situation.
- During any situation related to work, such as at a social event with colleagues.
- Against a colleague or other person connected to us outside of a work situation, including on social media.
- Against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.

If any sexual harassment or victimisation occurs, we'll take steps to deal with any complaints to prevent it happening again such as taking disciplinary action, providing further colleague training and updating relevant policies. Aggravating factors such as abuse of power over a more junior colleague will be taken into account in deciding what disciplinary action to take.

We all need to be aware that in some circumstances, sexual harassment may be a criminal matter to be handled by the police. An example of this might be if someone has made physical threats or sexually assaulted a colleague. This behaviour is never acceptable.

5. How can we prevent sexual harassment?

We all have a shared responsibility to help create and maintain an environment free from sexual harassment. You can do this by:

- Considering how your own behaviour may affect others and amending it if necessary.

- Being receptive, rather than defensive, if asked to modify your behaviour.
- Educating yourself through training, use of the Inclusion Hub and My Learning resources.
- Treating your colleagues with dignity and respect.
- Asking appropriate and respectful questions to establish boundaries.
- Taking a stand if you think inappropriate comments, jokes or behaviour is occurring.
- Making it clear to others if you find their behaviour unacceptable.
- Intervening, if possible, to stop sexual harassment and giving support to others.
- Ensuring any 1:1 meetings are conducted in an appropriate and comfortable environment. For example, where possible these should be in a room with windows and open blinds.
- Reporting sexual harassment or potential sexual harassment in the appropriate manner to either your line manager, someone you trust, a member of the ER team, or to the confidential Whistleblowing hotline.

It's particularly important if you're a leader or manager to lead by example and to role model kindness and respectful behaviour.

We also know there are times when colleagues can develop a closer personal relationship through work. Remember you should let your line manager know as soon as possible if you're in a personal relationship with another colleague. Should there be a conflict we may need to move one or both colleagues involved.

6. What to do if you're concerned about sexual harassment or victimisation?

It's important you feel safe at work, so the right person needs to know what's happened to ensure that the right action can be taken. It can be difficult speaking up but please know support is available.

We encourage all colleagues to raise any concerns as soon as you can by talking to your line manager or someone you trust in the first instance. Whether it's something you've witnessed or experienced personally, we want to hear from you.

It's hugely important to us at Currys that we support and protect our colleagues at work, so please be reassured that when you speak up, you'll be listened to and given time to share what's happened. Speaking up will have no negative consequences on your role, your career or how we think of you. In fact, by speaking up you're helping us to keep you and everyone safe.

We have a [Grievance Policy \(UK&ROI\)](#) if you need to take a more formal route. You can also contact the Employee Relations Team in confidence directly via email to ERHub@currys.co.uk.

Alternatively, you can contact the confidential Whistleblowing hotline using the methods below. Don't worry, any contact you make will be treated confidentially. All calls and online form submissions go straight to the hotline provided by Navex Global. Navex Global is an independent third party and you can ask for translation services if you need them.

Online – You can make an online report by going to:

- For PC/Laptop: currys.ethicspoint.com
- For Mobile Devices: <https://currys.navexone.eu>

Phone – You can phone the confidential hotline. They'll pass your concern on to Currys' Confidential Hotline Team for investigation under this policy. You'll be given a unique identity number to record your concern and allow you to call back and stay updated on how the issue is being investigated. Navex Global won't reveal your identity to Currys without your consent.

Country	Freephone Number
ROI	1800 851 102

6.1. Informal vs. formal complaints

If you're being sexually harassed, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour isn't welcome and/or makes you uncomfortable. If this is too difficult, or if you're uncertain whether an incident or series of incidents amounts to sexual harassment, you should speak to your line manager or the ER team, who can provide confidential advice, guidance, and assistance in resolving the issue formally or informally.

If you feel unable to speak to your line manager because the complaint concerns them or for any other reason, you should speak to someone appropriate at work that you trust or you can contact the ER team via email at ERHub@currys.co.uk.

If this doesn't resolve the issue, or if informal steps aren't appropriate or have been unsuccessful (for example, in more serious cases or where the alleged harasser doesn't accept that they've done anything wrong), you should follow the formal procedure set out in our [Grievance Policy \(UK&ROI\)](#).

You can make your complaint a formal grievance at any stage if you wish to.

6.2. What if I witness sexual harassment or victimisation?

If you witness sexual harassment or victimisation, or if someone tells you they've been harassed or victimised, we encourage you to take appropriate steps to address it. Depending on the circumstances, this could include:

- Intervening where you feel able to do so.
- Supporting the victim to report it or reporting it on their behalf.
- Reporting the incident where you feel there may be a continuing risk if you do not report it.
- Co-operating in any investigation into the incident.

Witnesses will be provided with appropriate support and will be protected from victimisation.

6.3. Requests from colleagues not to take action

If you raise a complaint but ask us not to take the matter any further, Currys will respect your wishes, where possible. However, we have a duty to protect our colleagues, meaning there may be some circumstances where we may need to take more formal action.

We'll keep a record of the complaint and your request to keep the matter confidential and take steps to ensure that the matter is resolved. Where appropriate, we'll encourage you to address the issue informally, either yourself or with the right level of support and guidance. We'll also arrange follow ups to check in to find out that the situation has improved. Where the situation hasn't improved, it may be necessary to address the issue more formally, both for your wellbeing and the wellbeing of other Currys colleagues.

If it's decided that formal action must be taken, we'll explain this to you beforehand, and put into place appropriate safeguards and support.

7. Investigating concerns

We'll investigate complaints in a timely, respectful and confidential manner.

Your concerns will be passed to an investigating manager, who'll arrange a meeting with you, usually within 48 hours of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation.

Where your complaint is about another colleague, we may consider suspending them on full pay or making other temporary changes to working arrangements as appropriate while we conduct our investigations. We'll also consider what additional action may be appropriate to protect you and other colleagues pending the outcome of the investigation.

After meeting with you, the investigator will also meet with the alleged harasser to hear their account of events. They have the right to be told the details of the allegations against them, so that they can respond.

Where your complaint is about a third-party, such as a customer, supplier or visitor, we'll consider what action may be appropriate to protect you and other colleagues, pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we'll attempt to discuss the matter with the third-party.

We'll also consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser.

Whether your concerns involve a colleague or a third-party, it may be necessary to interview the witnesses mentioned in your complaint. Also, in some cases information may be shared with Senior Managers and People Business Partners. If so, they'll always act in a way that respects confidentiality.

We'll aim to complete all investigations within 14 working days. We'll keep you updated if there are any delays and explain the reason.

7.1. Action following investigations

Once the investigating manager has concluded their investigations, they'll arrange a meeting with you, usually within a week of completing their findings, in order to discuss their findings/outcome with you and what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting.

If the investigating manager considers there's a case to answer, we'll progress this in line with our disciplinary policy. Our investigation into your complaint may be put on hold pending the outcome of the disciplinary procedure.

Where the disciplinary outcome is that sexual harassment occurred, prompt action will be taken to address it. We'll also consider what additional measures need to be taken to prevent future sexual harassment of our colleagues. If the harasser is a third-party, we'll consider what action would be appropriate to deal with the problem and prevent reoccurrence.

Once we're in a position to, we'll provide you with a written outcome to your complaint. If you're not satisfied with the outcome, you have the right to appeal the decision in writing.

When appropriate and possible, where your complaint is upheld, we'll advise you of the action that's been taken to address your complaint, subject to data protection rules, and we'll inform you of any recommended actions put in place to prevent a similar event happening again.

Whether or not your complaint is upheld, we'll consider how best to support and manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation or counselling, or to change the duties, working location or reporting lines of one or both parties.

Colleagues who make complaints, report that they've witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action in line with our disciplinary policy.

We'll monitor the treatment and outcomes of all complaints of sexual harassment or victimisation we receive to ensure:

- They're properly investigated and resolved.
- Those who report or act as witnesses are not victimised.
- Repeat offenders are dealt with appropriately.
- Workforce training is targeted where needed.

Any colleague who deliberately provides false information in bad faith, may be subject to action in line with our disciplinary policy. However, you'll not be disciplined or treated detrimentally simply because your complaint has not been upheld.

7.2. Record-keeping

We want colleagues to feel confident to speak up and in turn we'll ensure that we keep complaints as confidential as possible.

Information about a complaint by or about a colleague will be held on ER Hub and may be placed on your/their personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our [Data Protection Policy \(UK&ROI\)](#).

8. Where can I go for additional support?

Your wellbeing is important to us, and throughout your time at Currys, we want to make sure you're kept safe, happy and well. For our UK and Republic of Ireland colleagues we've lots of support and resources available to you that can be accessed via [Wellbeing Corner](#), our dedicated area for all wellbeing support. [Here](#) you'll find information on our Mental Health First Aiders and our partnership with Champion Health, where you can access a personalised hub of support tailored to your needs.

We know that there may be times when you might need some additional support. But please don't worry we're here to help. You can speak to your manager at any point, however if you'd like to speak to someone independent too, you can contact our Employee Assistance Programme (EAP). They offer free independent and confidential advice and can support with a

variety of issues at work or at home. Click [here](#) to access more information about our EAP including contact details to speak to a qualified counsellor.

As well as our Employee Assistance Programme, you can also get support from the Currys Trade Union (CTU) or your local forum representative.

9. Document retention

Please make sure that you follow the document retention guidelines in our [Data Retention Policy \(UK&ROI\)](#) for any records created as a result of these processes.

As a quick note, if you've printed this document, please remember it could be out of date. For the most up to date information please visit the policy section within People Place. Please also be aware that this policy is non-contractual and may be amended from time to time.

10. Document Control Details

Document Point of Contact:	ER Team
Version:	1
Published & Effective From:	November 2024
Next Scheduled Review:	This policy will be reviewed annually, or as the need arises by the ER team. We'll monitor its effectiveness and implement any changes that may be required.