



Sexual Harassment Policy

Introduction

Metaverse VR (MVR) recognises that sexual harassment is unlawful under the Equality Act 2010 (EA). Employees are entitled to be treated with dignity and respect in the workplace. This means freedom from sexual harassment, feeling safe and supported, and having access to appropriate redress if such behaviour arises.

Sexual harassment can take many forms. Whatever form it takes, it is unlawful and will not be tolerated by MVR.

MVR has a legal duty to take all reasonable steps to prevent sexual harassment of its employees. We take proactive measures to prevent sexual harassment and have clear reporting procedures for employees to raise concerns or make complaints. If you have been sexually harassed, or have witnessed sexual harassment, we encourage you to report it so that we can address the matter promptly and effectively.

The Chief Operating Officer (COO) has overall responsibility for the implementation and operation of this policy but may delegate elements of implementation or decision-making to the People Operations Lead (POL) or Line Managers.

All line managers are expected to maintain an open-door approach, and we encourage all employees to raise concerns relating to sexual harassment. All employees have a responsibility to behave in accordance with this policy. Instances of sexual harassment or victimisation may lead to disciplinary action up to and including dismissal.

MVR will review this policy at regular intervals to ensure its effectiveness and compliance with current legislation.

Scope

This policy applies to all employees, workers, agency workers, contractors and volunteers working for MVR, including at any overseas sites.

It covers behaviour occurring in the following situations:

- During working hours in the course of employment
- Outside the normal workplace or working hours where related to work (e.g. work events, social functions, working lunches)
- Outside the course of work but involving a colleague or other person connected to the organisation, including via social media
- Outside the course of work where the conduct is relevant to an individual's suitability to carry out their role

Definitions

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of:

- Violating a person's dignity; or
- Creating an intimidating, hostile, degrading or offensive environment.

It also includes treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature.

Sexual harassment may be committed by a colleague, manager, contractor, third party or any individual encountered in connection with employment. It does not need to occur in person and may take place through digital means, including social media platforms (e.g. WhatsApp). A person may be sexually harassed even if they were not the direct target of the behaviour.

Examples include (but are not limited to):

- Sexual comments, jokes or "banter"
- Displaying sexually explicit images
- Suggestive looks, staring or leering
- Unwanted sexual advances or propositions
- Promising work-related benefits in exchange for sexual favours
- Sexual gestures
- Intrusive questions about someone's private or sex life
- Sharing sexually explicit messages or content
- Spreading sexual rumours
- Unwelcome physical contact such as touching, hugging, massaging or kissing

Victimisation

Victimisation occurs when someone is subjected to a detriment because they have carried out, are suspected of carrying out, or intend to carry out a protected act under the Equality Act 2010.

Protected acts include:

- Making a complaint of discrimination or harassment
- Giving evidence or information in connection with proceedings under the EA
- Alleging that someone has breached the EA
- Doing anything else in connection with the EA

Examples include:

- Being denied promotion because a complaint was made
- Being dismissed for supporting a colleague's complaint
- Being excluded from meetings for acting as a witness

Victimisation will not be tolerated and may result in disciplinary action.

What to Do if You Are Subject to Sexual Harassment or Victimisation

MVR is committed to ensuring that sexual harassment and victimisation do not occur within our organisation. Allegations will be handled promptly, sensitively and in accordance with our disciplinary procedures.

Informal Resolution

Where appropriate and if you feel comfortable doing so, you may wish to make it clear to the individual that their behaviour is unwelcome and ask them to stop. If you prefer, you may raise the matter with a senior colleague as a confidential helper. This person cannot be the same individual responsible for investigating the matter if it becomes formal. You may also raise concerns during a one-to-one meeting with your Line Manager. If you do not have one scheduled, you may request a meeting.

Formal Complaint

If informal resolution is not appropriate or has not resolved the matter, you should submit a formal written complaint to the COO or POL.

Where possible, your written complaint should include:

- The name of the alleged harasser
- The nature of the alleged harassment
- Dates and times of incidents
- Names of any witnesses
- Any action already taken

Upon receipt of a formal complaint, MVR may take appropriate steps to ensure a fair investigation. This may include temporary redeployment or suspension on full contractual pay.

You will be invited to attend a meeting within five working days where reasonably practicable. You have the right to be accompanied by a colleague of your choice.

The investigation will normally conclude within 10 working days. The outcome will be confirmed in writing.

You have the right to appeal within five working days of receiving the outcome. The appeal will be heard, where reasonably practicable, by a more senior manager than the one who conducted the initial meeting. The final decision will normally be confirmed within 10 working days of the appeal meeting.

You will not be victimised for raising a complaint.

Witnessing Sexual Harassment

If you witness sexual harassment, you are encouraged to take appropriate action where safe to do so.

This may include:

- Intervening if appropriate
- Supporting the individual affected
- Reporting the matter yourself

Reports can be made to your Line Manager, the COO, POL or via HR@metaverse-vr.co.uk. Concerns will be handled sensitively and confidentially.

Third-Party Sexual Harassment

Third-party sexual harassment occurs when an employee is subjected to harassment by someone not employed by MVR (e.g. customers, suppliers or members of the public).

MVR will take all reasonable steps to prevent third-party sexual harassment. This includes communicating our zero-tolerance approach within supplier documentation.

If you experience third-party harassment, report it to your Line Manager, the COO, POL, or via HR@metaverse-vr.co.uk.

Where appropriate, MVR may:

- Issue a formal warning to the third party
- Restrict access to premises
- Report criminal behaviour to the police

Disciplinary Action

If an allegation is upheld, disciplinary action may be taken in accordance with our Disciplinary Policy, up to and including summary dismissal. Aggravating factors, such as abuse of power or seniority, will be taken into account. If a complaint is found to have been made maliciously and in bad faith, disciplinary action may also be taken.

Training

MVR provides training to all employees to ensure understanding of:

- What sexual harassment is
- Expected standards of behaviour
- Reporting procedures
- Potential disciplinary consequences

Managers receive additional training on preventing and managing sexual harassment and handling complaints appropriately. Training effectiveness will be reviewed regularly.

Employee Assistance Programme

Additional confidential support is available via our Employee Assistance Programme (EAP) provider, Aviva. The service can be accessed at: www.aviva.co.uk