



Sexual Harassment Policy

Purpose

This Sexual Harassment Policy outlines the procedures and guidelines that CAPITAL SHIELD SECURITY LTD adheres to in order to prevent and address sexual harassment in the workplace. This policy applies to all employees, contractors, and associates of CAPITAL SHIELD SECURITY LTD, including those working on-site as security personnel, in the head office, or at any client location.

Scope

This policy applies to all employees, clients, vendors, and any other third-party individuals with whom the employees of CAPITAL SHIELD SECURITY LTD interact during the course of their duties. The company operates from its headquarters in London and applies this policy in accordance with UK law, specifically the Equality Act 2010.

1. Policy Statement

CAPITAL SHIELD SECURITY LTD is committed to maintaining a work environment that is free from sexual harassment and any form of discrimination. We do not tolerate sexual harassment of any kind in the workplace or during work-related activities, whether conducted by employees, managers, contractors, or third parties.

All employees have the right to work in a professional atmosphere that promotes equal opportunities and prohibits discriminatory practices, including sexual harassment. Any breach of this policy will result in disciplinary action, which may include dismissal.

2. Definition of Sexual Harassment

Sexual harassment is defined as any unwelcome conduct of a sexual nature that makes a person feel offended, humiliated, or intimidated. It can be physical, verbal, or non-verbal and may include (but is not limited to):

- Verbal harassment: Unwanted comments, jokes, or propositions of a sexual nature, including remarks about someone's appearance or discussions of sexual matters.
- Physical harassment: Unwelcome physical contact, such as touching, grabbing, or any other inappropriate physical behavior.
- Non-verbal harassment: Displaying offensive or sexually suggestive materials, making lewd gestures, or sending sexually explicit emails or messages.
- Quid pro quo harassment: Offering employment benefits (such as promotions, salary increases, or desirable assignments) in exchange for sexual favors, or threatening an employee's job security or work conditions if they refuse sexual advances.

3. Legal Framework



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This policy is in line with the Equality Act 2010, which makes it unlawful to discriminate against or harass someone based on their gender or any other protected characteristic. Sexual harassment is a form of unlawful discrimination under this Act.

Employees have the right to:

- A work environment free from sexual harassment.
- Report incidents of harassment without fear of retaliation.
- Have their complaints addressed swiftly and confidentially.

4. Responsibilities

Employer Responsibilities:

- Maintain a safe working environment free from sexual harassment.
- Ensure that all employees, including security guards and office staff, understand this policy and their responsibilities.
- Provide training on sexual harassment awareness and prevention.
- Respond to complaints of sexual harassment promptly, fairly, and confidentially.
- Take appropriate disciplinary action where necessary.

Employee Responsibilities:

- Treat colleagues, clients, and all individuals with respect.
- Report any form of harassment immediately using the procedures outlined below.
- Cooperate with any investigations or actions taken by the company to address complaints.

5. Reporting Procedures

CAPITAL SHIELD SECURITY LTD encourages employees to report any incidents of sexual harassment. Complaints can be made formally or informally, and all reports will be treated seriously and in confidence.

1. **Immediate Reporting:** If an employee feels they are a victim of sexual harassment, they should report the incident immediately to their line manager or Human Resources (HR) department. Where the alleged harasser is their direct supervisor, the employee can bypass them and report directly to HR or a senior manager.
2. **Confidentiality:** All complaints will be handled with the utmost confidentiality. Information will only be shared on a need-to-know basis with those responsible for addressing the complaint.
3. **Support:** Employees who report harassment will not face retaliation. CAPITAL SHIELD SECURITY LTD is committed to supporting those who report harassment, ensuring that they do not experience any negative repercussions in the workplace as a result of their complaint.

6. Investigation Process



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Upon receiving a complaint of sexual harassment, the following steps will be taken:

1. Initial Assessment: HR or an appointed manager will carry out an initial assessment to determine whether the complaint warrants a full investigation.
2. Investigation: If warranted, an investigation will be conducted by HR or an independent investigator. This will involve:
 - Gathering statements from the complainant, alleged harasser, and any witnesses.
 - Reviewing any relevant evidence, such as emails, messages, or CCTV footage if available.
 - Ensuring the complainant is protected from further harassment during the investigation.
3. Outcome: After the investigation, a report will be compiled, and appropriate action will be taken, which could include:
 - Mediation between the involved parties.
 - Disciplinary action, including warnings, suspension, or dismissal of the harasser.
4. Follow-Up: After the conclusion of the investigation, HR will follow up with the complainant to ensure the harassment has stopped and that there is no retaliation.

7. Disciplinary Actions

If sexual harassment is found to have occurred, disciplinary actions may include:

- Written warning
- Mandatory harassment training or counseling
- Suspension without pay
- Termination of employment

Disciplinary actions will depend on the severity of the incident and any previous related behavior by the harasser.

8. False Allegations

While CAPITAL SHIELD SECURITY LTD encourages all employees to report harassment, false allegations of sexual harassment are taken very seriously. If an investigation reveals that a complaint was made maliciously or in bad faith, disciplinary action may be taken against the individual who made the false claim.

9. Training and Awareness

CAPITAL SHIELD SECURITY LTD will provide regular training and communication to all staff to raise awareness of sexual harassment, what constitutes unacceptable behavior, and how to report incidents. This will include:

- New employee induction to ensure all staff are aware of the policy from the start.
- Annual refresher training for all employees, especially those in supervisory roles, to reinforce the company's zero-tolerance stance on sexual harassment.



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10. Support for Victims

CAPITAL SHIELD SECURITY LTD is committed to supporting any employees affected by sexual harassment. Support may include:

- Counseling services through Employee Assistance Programs (EAPs).
- Flexible working arrangements during investigations if needed.
- Confidential advice from HR on how to handle incidents and file complaints.

11. Monitoring and Review

This policy will be reviewed annually or when there are changes in legislation to ensure it remains effective and in compliance with UK law. The company will also assess the outcomes of any reported incidents to improve the policy or its implementation.

Approval and Implementation:

This Sexual Harassment Policy has been approved by the Managing Director and is effective immediately. All employees are required to familiarize themselves with this policy and adhere to its guidelines.

Approved

Managing Director

A handwritten signature in black ink, appearing to be "J. Smith", is written over a horizontal line.

CAPITAL SHIELD SECURITY LTD

This policy is reviewed on 01 01 2026