October 2026

ADE Sexual Harassment Policy

We are committed to providing a working environment in which everyone is treated with dignity and respect and is protected from sexual harassment and other unlawful harassment. Sexual harassment is unlawful under the Equality Act 2010 and will not be tolerated. ADE will take all reasonable steps to prevent sexual harassment in the course of employment and to prevent harassment of employees by third parties. This includes taking proportionate preventive action before problems arise and responding promptly and fairly where concerns are raised.

Scope

This policy applies to employees, contractors, consultants, interns, and others working for or on behalf of ADE, as appropriate to their status. It also covers conduct by third parties encountered through our work, including member representatives, delegates, speakers, sponsors, suppliers, consultants, research participants, visitors, venue staff and other external contacts.
The policy applies to conduct in the office, online, and also to work events including conferences, receptions, social days, travel, site visits, research interviews, external meetings and work related communications.

What is Sexual Harassment?

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

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

Examples of sexual harassment include, but are not limited to:

- Unwelcome sexual advances, touching or physical contact
- Lewd, sexual or suggestive comments, jokes or gestures

- Inappropriate or suggestive remarks about someone's body, appearance or private life
- Displaying, sharing or sending sexually explicit or suggestive images, videos, emails or messages
- Repeated invitations or propositions after it has been made clear that they are unwanted
- Sexualised behaviour at work-related social events or where alcohol is being consumed
- Less favourable treatment because someone has rejected or submitted to sexual conduct

Sexual harassment can occur regardless of the sex, gender identity or sexual orientation of those involved. Conduct can amount to harassment even if the person responsible didn't intend to offend.

Third-party harassment and other unlawful harassment

ADE will not tolerate harassment of staff by third parties. Harassment can include unwanted conduct related to age, disability, gender reassignment, race, religion or belief, sex or sexual orientation that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

ADE will also treat bullying, discriminatory or abusive conduct seriously even where it does not meet the statutory definition of harassment. Staff are encouraged to report concerns about any work related conduct that makes them feel unsafe, degraded, humiliated or excluded.

Responsibilities and prevention

Preventing harassment is a shared responsibility, but ADE has organisational responsibilities to assess risks, put proportionate controls in place and act when concerns arise.

- All staff must treat colleagues and external contacts with dignity and respect and must not engage in conduct that breaches this policy.
- Managers and supervisors must model appropriate behaviour, take concerns seriously, respond promptly, and escalate matters where necessary rather than attempting to investigate serious concerns alone.
- The Head of Operations and Wellbeing is responsible for coordinating this policy, training and awareness, maintaining appropriate records, supporting risk assessment and ensuring that concerns are routed to the appropriate person.
- ADE will provide training, including materials for induction of new starters and refresher or targeted training where needed.
- ADE will assess foreseeable harassment risks in relevant work activities, including events, receptions, external meetings, travel, lone working, research interviews, online contact and situations involving alcohol or influential external contacts.
- Where appropriate, ADE will communicate standards of behaviour to members, delegates, suppliers, speakers, contractors and other third parties, and will take reasonable steps to reduce identified risks.

Reporting concerns

Anyone who experiences or witnesses sexual harassment or other harassment should report it as soon as they feel able. A report can be made verbally or in writing and may be raised informally or formally. You do not need to confront the person involved or attempt informal resolution before seeking support or making a formal report.

Concerns can be raised with:

- Your line manager
- The Head of Operations and Wellbeing
- The CEO

- The Chair of ADE's Executive Board where the concern involves the CEO, or where another reporting route would give rise to a conflict of interest

If the concern involves one of the people listed above, or you do not feel comfortable reporting to them, ADE will identify an alternative senior or independent contact. Witnesses may also raise concerns.
A concern does not need to be made in a particular format. ADE may ask for further information so that the matter can be assessed fairly, but a lack of complete evidence will not prevent an initial assessment or appropriate protective action.

Immediate safety and third-party incidents

If harassment occurs during an event, meeting, interview, visit or other work activity, staff may take reasonable steps to protect themselves or others. This can include ending a conversation, leaving the situation, stopping an interview or call, seeking help from a colleague or venue staff, or asking for an event lead to intervene. Staff will not be penalised for taking reasonable action to protect their safety or wellbeing.
Where a concern involves a third party, ADE may take proportionate interim or longer-term action. Depending on the circumstances and ADE's authority, this may include warning the individual, separating them from staff, ending or restricting contact, removing them from an event, asking an organisation to provide a different representative, restricting future attendance, or reviewing a supplier, contractual, sponsorship or membership relationship.

Investigation and response

All concerns will be taken seriously and handled promptly, sensitively and as confidentially as reasonably possible. ADE will carry out an initial assessment and decide what immediate support, protective measures and investigation are appropriate.

- Any investigation will be conducted by a suitably trained and impartial internal or external person with no material conflict of interest.
- The person raising the concern will be given an opportunity to explain what happened and provide relevant evidence or identify witnesses.
- The person accused will be given a fair opportunity to respond to the allegations.
- Relevant witnesses, documents, messages and other evidence will be considered where appropriate.
- An external person's refusal to participate will not necessarily prevent ADE from reaching a decision on the information reasonably available to it.
- A written outcome will be provided to the person who raised the concern where appropriate, subject to confidentiality and data protection obligations.

Where an employee has breached this policy, the matter may be dealt with under ADE's Disciplinary and Dismissal Policy and Procedure, up to and including dismissal in serious cases. Where the person responsible is a third party, ADE will consider the proportionate steps available to prevent recurrence and protect staff.

Confidentiality, victimisation and retaliation

Information about a concern will be shared only where there is a legitimate reason to do so, for example to assess the concern, investigate it, protect people, obtain advice, or comply with legal or governance obligations. ADE cannot promise absolute confidentiality, but will limit disclosure as far as reasonably possible.

No one will be victimised, penalised or subjected to retaliation for raising a concern, supporting another person, acting as a witness or participating in an investigation in good faith. Retaliation may itself be treated as a disciplinary matter.

Support

ADE will consider appropriate support for anyone affected by harassment. This may include:

- Support and guidance from the Head of Operations and Wellbeing or another appropriate contact
- Temporary adjustments to working arrangements or contact with the person involved, where reasonable and proportionate
- Reasonable time away from work or meetings where needed because of distress
- Signposting to ACAS and other appropriate independent support or advice services

ACAS provides independent workplace advice and guidance. It is not ADE's external HR provider and does not investigate complaints on ADE's behalf unless separately commissioned to provide a specific service.

False or malicious allegations

A complaint that is not upheld, cannot be substantiated, or is made in error will not by itself result in disciplinary action. However, knowingly making a false allegation or deliberately fabricating evidence may be treated as misconduct following a fair investigation.

Record keeping and review

ADE will keep appropriate records of concerns, actions and outcomes securely and in accordance with data protection and retention requirements. Records should distinguish between allegations, findings and actions taken.

This policy will be reviewed periodically and after significant incidents, material legal changes or identified gaps in controls. ADE will also review the effectiveness of training, reporting routes and preventive measures and will update risk assessments where appropriate.

Related policies

- Staff Handbook
- Grievance Policy and Procedure

- Disciplinary and Dismissal Policy and Procedure
- Whistleblowing Policy
- EDI and Equal Opportunities Policy

This policy should be read alongside ADE's other employment policies and does not remove any statutory rights or reporting routes available under law.