



## ANTI- SEXUAL HARASSMENT POLICY

M R Production World Tour Limited (“MRWT”) is committed to providing our Company Members with a work environment that is safe and free of sexual harassment. We have established this policy to assist Company Members in understanding:

- Our commitment to you
- Our legal obligations
- The expectations for all Company Members
- Options for raising issues or concerns
- Defining relevant terms

Sexual harassment and victimisation in relation to sexual harassment, are unlawful acts; and will not be tolerated by MRWT.

This policy applies to all MRWT Company Members and to third parties that engage with MRWT to undertake business or share common interests including a location such as a venue.

Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, MRWT, but with whom you come into contact during the course of employment/engagement. Third-party harassment could include, for example, unwelcome sexual advances from a supplier visiting a venue, or where a Company Member is attending a public event in the course of their employment.

We will take active steps to try to prevent third-party sexual harassment of Company Members.

MRWT will take all necessary and reasonable steps to ensure the work environment is free from:

- Sexual harassment in connection with work;
- Conduct that may create an environment that is hostile on the grounds of sex; and
- Acts of victimisation in relation to the above.

This is both a legal obligation and a commitment we make to all of our Company Members.

### Who this policy applies to

This policy applies to all MRWT Company Members including, but not limited to:

- Leadership and management (including the Producer, General Management, Company Management, Heads of Department and Deputy Heads of Department);
- Touring actors, musicians, stage managers and technical staff;
- Resident Creative team; and
- Contractors, sub-contractors.

All Company Members are expected to comply with this policy. MRWT may amend this policy from time to time. This policy does not form a part of any employment contract or contract for services. Nothing in this policy is intended to circumvent any legal rights or responsibilities of MRWT or

Company Members. To the extent that there is an inconsistency between the law and these policies, the law will prevail.

### When this policy applies

This policy applies whenever a Company Member is undertaking work on behalf of MRWT, where there is a sufficient connection to the workplace. This may include, but is not limited to:

- All aspects of employment and/or engagement;
- On-site, off-site or after-hours work;
- Work-related social functions (such as opening nights, after parties, award nights and industry events);
- Rehearsals, work-related travel, tours, promotional activities, or training sessions;
- Use of social media and other electronic communication (e.g. emails, text or Whatsapp messages); and
- Interactions with members of the public via any means.

### CONSULTATION

Sexual harassment poses a serious risk to the health and safety of Company Members and creates a hostile work environment.

MRWT has undertaken a risk assessment in relation to sexual harassment to identify any risk factors in our workplace. The risk assessment is a live document, and we welcome feedback from Company Members about any situation that makes them uncomfortable so that, we can mitigate any potential hazards or risks as and when they develop.

### RESPONSIBILITIES

All Company Members have a responsibility to ensure a safe and respectful culture at MRWT. Depending on your position and level of responsibility, you may have additional responsibilities in relation to this policy and the law.

#### **All Company Members**

All Company Members are expected to:

- Adhere to this policy
- Treat others with respect, courtesy, and dignity at all times
- Raise any concerns in an appropriate manner using the avenues outlined in this policy
- Not engage in gossip
- Not act in any way, or fail to act, so that the health and safety of another is put at risk
- Attend training in relation to this policy
- Follow all reasonable directions in relation to this policy in ensuring the health and safety of others in the workplace.

#### **Managers**

'Managers' for the purpose of this policy includes Heads of Department, the General Manager and Company Management. In addition to meeting the responsibilities of Company Members as described above, Managers must also:

- Lead by example including the use of inclusive and respectful language
- Ensure that all staff are abiding by this policy including making staff aware of it

- Supporting staff to attend training and education and providing time to do so in work hours
- Acting quickly and efficiently, with dignity and respect, and maintaining confidentiality to concerns raised
- Responding to all concerns raised and escalate where appropriate or required.

## **MRWT**

MRWT will ensure that:

- Ensure training is provided to all new Company Members during induction
- Ensure regular feedback and consultation is undertaken
- Regularly review and publish appropriate policies and procedures that are easily accessible by all staff
- Respond efficiently to concerns or matters that are brought to our attention
- Undertake risk assessments and other measures to assess and improve the safety of the workplace
- Hold all Company Members and managers accountable for their conduct and meeting their responsibilities under this policy.

## **SEXUAL HARASSMENT**

Sexual harassment is defined under the law (the Equality Act) as any unwanted physical, verbal or non-verbal 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 for them. A single incident can amount to sexual harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.

Behaviour can still be considered sexual harassment if:

- It is a one-off incident;
- The person engaging in the behaviour did not intend to humiliate, intimidate or offend;
- Another person or a group of people in the workplace are not offended by the behaviour;
- The behaviour was previously an accepted practice or act; or
- The act or practice was welcome at the time but under deliberately false or misleading information.

Sexual harassment can take many forms, including but not limited to:

- Suggestive comments, jokes, conversations or innuendo;
- Unwelcome flirting or repeated unwanted requests to go out on dates;
- Requests or pressure for sex and sexual favours and inappropriate advances;
- Staring or leering at a person or parts of their body;
- Giving inappropriate or unwanted gifts.
- Excessive or unwelcome familiarity or physical contact, such as touching, hugging, kissing, pinching, massaging; cornering someone or brushing up against someone;
- behaviour that may also be an offence under criminal law, such as physical or sexual assault, obscene sexual gestures, indecent exposure, stalking or obscene communications;
- Making or sending sexually explicit phone calls emails or text messages; or

- repeated or inappropriate advances online or sharing or threatening to share intimate images or film without consent.

If someone does not object to inappropriate behaviour, it does not mean that the behaviour is welcome or wanted.

Further, the intention of the person engaging in the behaviour is irrelevant. A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

### What is not sexual harassment

Where Company Members engage in consensual, welcome, and reciprocated behaviour, this is not sexual harassment. Appropriate professionalism is expected of Company Members at all times, including in relation to Company Members engaging in consensual behaviour.

### RAISING CONCERNS OR GRIEVANCES

We encourage all Company Members to raise any concerns or grievances they hold directly with the Company Manager. If it is not appropriate to do so, including Company Members being uncomfortable raising the issue with the Company Manager, they may raise their concerns with the General Manager.

There are a variety of ways that a concern or complaint may be addressed and will depend on the nature of the matter raised.

We strive to make you feel safe and comfortable when reporting inappropriate behaviour and we always take into consideration your preferences for resolution. However, there may be times where we are required to take an avenue you may not request as we may have a duty of care to act or legal obligation to act.

Whatever avenue we take, you will be supported, and your health and wellbeing prioritised.

### Informal

Informal approaches focus on seeking a resolution over making a finding or substantiating a grievance. These approaches are most appropriate in situations where those involved are able and willing to move forward quickly, efficiently and without assigning blame.

This may include actions such as:

- supporting or coaching you to resolve the matter directly with the person or persons
- facilitating discussions between relevant parties
- providing training and education on a particular matter.

Where a matter cannot be resolved using an informal process, or if the matter raised is of a serious nature, MRWT may determine that a formal process is required.

### Formal

Formal processes are used when MRWT is required to determine if a particular event or situation or similar has occurred or when the allegations made are of a serious nature that may be unlawful or a threat to the health and safety or may lead to disciplinary action being taken against one or more persons.

All formal processes will be undertaken to ensure fairness to all parties. For further information please refer to the Grievance and Investigations Policy.

### External

Company Members also have the option of raising their complaint with an external body, depending on the nature of the complaint and the concerns to be address.

### Police

Sexual harassment can include acts that are considered criminal such as sexual assault.

Any employee that chooses to report criminal conduct to the police will have the full support of MRWT. In some instances, MRWT may be required to report criminal conduct. However, we will always discuss this with the person/s impacted beforehand.

### VICTIMISATION

Victimisation occurs when a person or group of people are treated poorly, unfairly or suffer a detriment because they have exercised, or plan to exercise, a workplace right such as:

- bringing proceedings under the Equality Act 2010;
- giving evidence or information in connection with proceedings under the Equality Act 2010;
- doing any other thing for the purposes of or in connection with the Equality Act 2010; or
- alleging that a person has contravened the Equality Act 2010.

Examples of Victimisation include:

- denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment;
- excluding someone because they have raised a grievance about sexual harassment;
- failing to promote someone because they accompanied another Company Members member to a grievance meeting;
- dismissing someone because they gave evidence on behalf of another Company Member at an employment tribunal hearing.

Victimisation is unlawful and will not be tolerated by MRWT. It may lead to disciplinary action up to and including dismissal if committed:

- In connection to the workplace;
- During any situation related to work, such as at a social event with colleagues;
- Against a colleague or other person connected to the Production outside of a, including on social media.

### CONFIDENTIALITY

All matters raised with MRWT, including a formal grievance, will be treated with the highest standards of confidentiality.

We expect all employee and representatives of MRWT to also maintain confidentiality. Failure to do so may result in disciplinary action including termination of employment.

## ANONIMITY

To ensure procedural fairness, it is not always possible for those raising complaints or issues to remain anonymous.

Anonymous complaints may also limit the ability of MRWT to investigate matters raised fully particularly if we are unable to verify allegations or afford those involved procedural fairness.

## SUPPORT

MRWT provides support to all Company Members who may be impacted by actions taken under this policy including those that are subjected to inappropriate conduct and witnesses. We understand that support needs will vary between individuals and between scenarios. We will ask you what supports may assist you and provide these where possible and reasonable. Below are some common support options Company Members can access.

### Temporary adjustments to work arrangements

MRWT may temporarily alter your working arrangements during or a period following an incident under this policy. This may include adjusting hours, work locations, or even duties for a period of time.

### EAP

All MRWT Company Members have access to free, confidential counselling and support through our partner Employee Assistance (EAP) provider.

Your sessions with Wellbeing in the Arts are completely confidential. MRWT are not provided with any personal details for users of the service.

### Manager and Company Manager

You can also reach out to the Company Manager for information or support in relation to this policy.

Please note that if you raise a serious matter with your manager, under law they are obligated to act whether you request this or not.

### Other support services

Below is list of external and independent services that may be useful.

Service	Contact details	Description
Acas Helpline	0300 123 1100	Open Monday to Friday, 8am to 6pm. A helpline for anyone who needs employment law or workplace advice, including employees and workers.
Rape Crisis – England and Wales	<a href="https://247sexualabusesupport.org.uk">https://247sexualabusesupport.org.uk</a> Call 0808 500 2222	24/7 service for anyone aged 16+ in England and Wales who has been affected by rape, child sexual abuse, sexual assault, sexual harassment or any other form of sexual violence – at any point in their life. This includes people of all genders who have experienced sexual violence or abuse, as well as anyone supporting them.

Samaritans	<a href="http://www.samaritans.org/how-we-can-help/contact-samaritan/">www.samaritans.org/how-we-can-help/contact-samaritan/</a> Call 116 123	27/7 Helpline. If you're struggling to cope and need someone to talk to, you can contact the Samaritans by phone for free or contact them via email or forms on their website.
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### BREACH OF POLICY

Any Company Member found to be in breach of this policy may face disciplinary action including termination of employment.

Others found to be in breach of this policy that are not direct Company of MRWT, may have their contracts or services with the organisation terminated.

### CHANGES TO THIS POLICY

MRWT may amend this policy from time to time. This Policy will be reviewed as required, such as a change in legislation. If you require further information or clarification regarding this policy, its content or application, please contact Tess Ellison on [tess@ngm.global](mailto:tess@ngm.global) or +44 7701 213766

### REVIEW

This Policy was last updated on 12 May 2026.