



Sexual Harassment Policy	
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1. Policy Statement

CM Sports UK Ltd is committed to providing a workplace in which everyone is treated with dignity, respect and fairness.

We do not tolerate sexual harassment, sexual misconduct, victimisation, bullying, intimidation or any other inappropriate behaviour.

All employees, workers, volunteers, contractors and other individuals working on behalf of CM Sports are expected to maintain appropriate professional standards and boundaries.

CM Sports recognises that sexual harassment can have a significant impact on an individual's dignity, wellbeing, safety and ability to work effectively.

Where conduct involves children or raises concerns about the safety or welfare of a child, the matter will also be treated as a **safeguarding concern** and managed in accordance with the Safeguarding & Child Protection Policy.

CM Sports will take reasonable steps to prevent sexual harassment, respond appropriately to concerns and support individuals who raise concerns or complaints.

2. Scope

This policy applies to:

- Employees.
- Casual and temporary workers.
- Agency workers.
- Volunteers.
- Self-employed workers and contractors.
- Managers and senior leaders.
- Visitors and other individuals working with or on behalf of CM Sports.

It applies in all work-related circumstances, including:

- CM Sports premises and activity settings.
 - Schools and other venues where CM Sports operate.
 - Sports sessions and activities.
 - Training and meetings.
 - Work-related travel.
 - Work social events.
 - Online meetings and communications.
 - Email, messaging services and social media.
 - Communication between staff outside normal working hours where the conduct is connected to work.
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3. What is Sexual Harassment?

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment may occur in person or through digital communication.

A person may experience sexual harassment even where they were not the intended target of the behaviour.

Sexual harassment can be committed by:

- A colleague.
- A manager or senior member of staff.
- A volunteer or contractor.
- A parent or carer.
- A customer or service user.
- A member of the public.
- Another third party connected with CM Sports.

Examples may include, but are not limited to:

- Sexual comments, jokes or so-called "banter".
- Sexual remarks about someone's appearance or body.
- Unwanted sexual advances or propositions.
- Sexual gestures.
- Unwanted touching, hugging, kissing or other physical contact.
- Intrusive questions about someone's sex life or relationships.
- Sharing sexually explicit material.
- Displaying sexually explicit images.
- Sexual messages, emails or social media communications.
- Spreading sexual rumours.
- Making sexual comments about another person.
- Sending unwanted sexually explicit photographs or messages.
- Online sexual harassment.
- Repeated unwanted contact of a sexual nature.

The fact that behaviour is described as "banter", a joke or something that was not intended to offend does not automatically make it acceptable.

4. Victimisation

Victimisation occurs where an individual is subjected to a detriment because they have carried out, or are believed to have carried out, a protected act under equality legislation.

This can include:

- Making or supporting a complaint about discrimination or harassment.
- Giving evidence or information relating to a complaint.
- Raising an allegation that equality legislation has been breached.
- Supporting another person who has raised a complaint.

CM Sports will not tolerate victimisation of anyone who raises a genuine concern, makes a complaint or supports another person.

5. Professional Boundaries

All staff and other adults working with CM Sports must maintain appropriate professional boundaries.

This is particularly important because CM Sports works with children.

Adults must:

- Maintain appropriate professional relationships with children.
- Avoid inappropriate sexualised conversations or behaviour around children.
- Avoid inappropriate physical contact.
- Use appropriate communication channels.
- Maintain appropriate boundaries when communicating electronically.
- Never send, request or share inappropriate images or messages involving children.
- Never engage in sexualised behaviour with a child.
- Report concerns about another adult's behaviour towards a child immediately.

Professional boundaries apply both during work activities and to work-related digital communication.

6. Sexual Harassment Involving Children

Where sexual harassment, sexualised behaviour or inappropriate sexual conduct involves a child, the matter must be considered under safeguarding procedures.

This may include:

- Sexual comments or jokes directed towards a child.
- Sexualised or inappropriate communication.
- Sexual images or messages involving children.
- Inappropriate touching.

- Sexual harassment between children.
- Sexual harassment by an adult towards a child.
- Online sexual communication involving a child.
- Grooming or other concerning behaviour.

Staff must report safeguarding concerns to the **Designated Safeguarding Lead (DSL) or Deputy DSL without delay**.

Staff must not investigate safeguarding concerns themselves or attempt to determine whether an allegation is true before reporting it.

7. Child-on-Child Sexual Harassment

CM Sports recognises that sexual harassment and harmful sexual behaviour can occur between children.

Examples may include:

- Sexual comments or jokes.
- Sexualised name-calling.
- Unwanted touching.
- Sexual rumours.
- Sharing sexual images.
- Pressuring another child to engage in sexual behaviour.
- Online sexual harassment.
- Sexual intimidation.
- Sexualised bullying.

Such behaviour will never be dismissed simply as "banter", "children being children" or normal friendship behaviour.

Concerns will be considered in accordance with the child's age, development, circumstances and individual needs.

Any concern that may indicate a safeguarding risk must be reported to the DSL.

8. Online and Digital Sexual Harassment

Sexual harassment may occur through:

- WhatsApp or other messaging platforms.
- Social media.
- Email.
- Online meetings.
- Group chats.
- Images, photographs or videos.
- Other digital communication.

Staff must not use personal communication channels with children except where this is specifically authorised and appropriate within CM Sports procedures.

Any inappropriate digital communication involving a child must be reported immediately as a safeguarding concern.

9. Third-Party Sexual Harassment

Third-party sexual harassment occurs when a member of the CM Sports workforce is subjected to sexual harassment by someone who is not part of the workforce.

This may include:

- Parents or carers.
- Customers or service users.
- Members of the public.
- Suppliers.
- Contractors.
- Visitors.
- Other professionals working at a shared venue.

CM Sports will take reasonable steps to prevent and respond to third-party sexual harassment.

Depending on the circumstances, action may include:

- Speaking to the individual.
- Setting clear behavioural expectations.
- Restricting contact.
- Removing an individual from a CM Sports activity or setting where appropriate.
- Reporting criminal behaviour to the police.
- Reviewing risk assessments and working arrangements.

Where third-party conduct raises a concern about a child's safety or welfare, the safeguarding procedure will also apply.

10. Reporting a Concern

Anyone who experiences or witnesses sexual harassment or victimisation is encouraged to report it.

Concerns may be raised with:

- A line manager.
- A Regional Manager.
- A member of CM Sports Management.
- The Managing Director.
- The appropriate safeguarding lead where a child may be involved.

A person does not have to confront the alleged harasser before reporting a concern.

Where the concern involves the person's line manager or another manager, the concern may be reported directly to another appropriate senior manager.

Where the concern involves the Managing Director or senior management, staff should use the Whistleblowing Policy or another appropriate independent reporting route.

11. Informal Resolution

Where appropriate and where the person raising the concern feels comfortable, an informal approach may be considered.

This could include:

- Clearly explaining that the behaviour is unwelcome.
- Asking the person to stop.
- Speaking to a manager.
- Seeking support from an appropriate colleague.

However, **no individual is required to confront the person responsible.**

An informal approach will not be appropriate in every situation, particularly where:

- The behaviour is serious.
 - There is a significant imbalance of power.
 - The individual does not feel safe.
 - The alleged perpetrator is a manager.
 - The conduct involves a child.
 - There may be a safeguarding concern.
 - The behaviour may constitute a criminal offence.
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12. Formal Complaint

A formal complaint should be raised with an appropriate manager or member of CM Sports Management.

Where possible, information may include:

- Name of the person involved.
- Description of the behaviour.
- Date and approximate time.
- Location.
- Names of witnesses.
- Relevant messages, emails or other evidence.
- Any action already taken.

A person should not delay reporting simply because they do not have all of this information.

13. Handling and Investigation

CM Sports will take complaints seriously and deal with them sensitively and appropriately.

Investigations will be:

- Fair.
- Proportionate.
- As confidential as reasonably practicable.
- Conducted by an appropriate person.
- Carried out without unnecessary delay.

The investigator will consider whether temporary measures are required to protect those involved while an investigation is undertaken.

These may include changes to working arrangements, reporting lines, locations or duties.

Suspension will only be considered where appropriate and in accordance with the Company's employment procedures.

There may be circumstances where an investigation takes longer than initially expected. Where this occurs, those involved will be kept appropriately informed.

14. Confidentiality and Information Sharing

Information relating to complaints will be handled sensitively.

Information will only be shared with those who need it for a legitimate purpose, including investigating or managing the concern or protecting someone from harm.

Confidentiality cannot prevent appropriate safeguarding information sharing.

Where a concern relates to a child, information may need to be shared with the DSL, parents/carers where appropriate, Children's Social Care, police or other relevant safeguarding agencies.

15. Safeguarding and Concerns About Adults

Where an allegation or concern involves an adult working with or on behalf of CM Sports and relates to a child, the matter must be immediately referred through safeguarding procedures.

This includes concerns that an adult may have:

- Behaved inappropriately towards a child.
- Breached professional boundaries.
- Used sexualised language towards a child.

- Sent inappropriate messages or images.
- Engaged in grooming behaviour.
- Used their position of trust inappropriately.
- Caused or potentially caused harm to a child.

Staff must report concerns regardless of the person's position or seniority.

The CM Sports Safeguarding & Child Protection Policy will determine the appropriate safeguarding response.

16. Supporting Individuals

CM Sports recognises that sexual harassment can affect an individual's emotional wellbeing and confidence.

Appropriate support may include:

- Regular management contact.
- Adjustments to working arrangements where appropriate.
- Signposting to professional support.
- Employee Assistance Programme support where available.
- Appropriate occupational or wellbeing support.

Support will be considered according to the individual's circumstances.

17. Protection from Victimisation or Retaliation

No person will be subjected to unfair treatment because they:

- Raise a genuine concern.
- Make a complaint.
- Support another person.
- Provide information during an investigation.
- Participate as a witness.

Any alleged victimisation or retaliation will be treated seriously and may result in disciplinary action.

18. Malicious or Deliberately False Complaints

CM Sports recognises that concerns about sexual harassment may be difficult to raise.

No person will be penalised simply because a complaint cannot be substantiated.

However, where an investigation establishes that an individual has deliberately made a knowingly false or malicious allegation, this may be considered under the Company's disciplinary procedures.

This provision must not discourage anyone from raising a genuine concern in good faith.

19. Disciplinary Action

Where allegations are substantiated, appropriate action will be taken in accordance with CM Sports' disciplinary procedures.

Depending on the circumstances, this may include:

- Informal action.
- Management action.
- Formal warnings.
- Changes to duties or working arrangements.
- Removal from a particular setting or activity.
- Termination of employment or engagement.

Serious misconduct may result in dismissal in accordance with applicable employment procedures.

Aggravating factors may be taken into account, including abuse of authority or a position of trust.

Where criminal conduct may have occurred, CM Sports may refer the matter to the police or another appropriate authority.

20. Training and Awareness

CM Sports will provide appropriate training and information to staff regarding:

- What sexual harassment is.
- What constitutes inappropriate behaviour.
- Professional boundaries.
- Online and digital conduct.
- How to report concerns.
- How to respond when someone raises a concern.
- Victimisation.
- Third-party harassment.
- Safeguarding concerns involving children.
- Concerns about adults working with children.

Managers will receive appropriate additional guidance on preventing, responding to and managing allegations.

Training will be reviewed and refreshed where appropriate.

21. Management Responsibilities

Managers are responsible for:

- Promoting a respectful working environment.
- Taking concerns seriously.
- Acting promptly when concerns are raised.
- Maintaining appropriate confidentiality.
- Ensuring concerns are escalated appropriately.
- Making safeguarding referrals where required.
- Supporting affected individuals.
- Maintaining appropriate records.
- Reviewing risks and working arrangements where necessary.
- Ensuring staff understand professional boundaries.

Managers must never discourage a person from reporting a concern.

22. Safeguarding Records and Monitoring

Where a concern has safeguarding implications, appropriate records will be maintained in accordance with CM Sports safeguarding procedures.

Records should include relevant information about:

- The concern.
- Actions taken.
- Decisions made.
- Referrals or escalation.
- Outcomes where known.

CM Sports will monitor the effectiveness of this policy and review themes or concerns where appropriate.

Personal information will be handled in accordance with applicable data protection requirements.

23. Whistleblowing

Where an individual believes that a serious concern has not been appropriately addressed, or where the normal reporting route is inappropriate, they may use the CM Sports **Whistleblowing Policy**.

This includes concerns about:

- Senior management.
- Safeguarding practice.
- Failure to act on a safeguarding concern.

- Serious breaches of professional standards.
 - Attempts to suppress or discourage legitimate reporting.
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24. Safeguarding and KCSIE 2026 Alignment

This policy supports CM Sports' commitment to maintaining safe professional cultures and is aligned with relevant **KCSIE 2026 safeguarding expectations** where applicable to CM Sports' work with children.

In particular, the policy supports:

- Safeguarding as everyone's responsibility.
- A child-centred approach.
- Recognition and reporting of concerns about adults.
- Recognition of child-on-child sexual harassment and harmful sexual behaviour.
- Online safety and online sexual harm awareness.
- Appropriate professional boundaries.
- Prompt reporting and escalation of safeguarding concerns.
- Appropriate information sharing.
- Accurate safeguarding records.
- Whistleblowing and escalation.
- Protection of children from abuse, harassment and exploitation.

Where a concern relates to a child, the Safeguarding & Child Protection Policy takes precedence for the safeguarding response.
