



timeTo

Code of Conduct

introduction

timeTo is the advertising and marketing industry's campaign to end sexual harassment, launched in 2018. It was created through a unique collaboration between the Advertising Association, NABS and WACL, and is backed by ISBA and the IPA.

Our first project was to undertake a major survey of more than 3,500 people in the industry. We were shocked by what we unearthed, and the findings greatly shaped our first iteration of the Code of Conduct. During the pandemic in 2020, we undertook another major survey of more than 1,200 people to understand the level and nature of sexual harassment following a radical change in the way we worked.

This updated version of the timeTo Code of Conduct combines the original code and the addendum, as well as the strengthening of legal protections and employer duties coming into force in 2026. It provides up-to-date guidance on sexual harassment prevention and awareness that reflects our industry's current ways of working.

These updates come at a crucial time for our industry. While hybrid and flexible working are now an established part of how we work, the risks identified in our 2020 research have not disappeared. At that time, 49% of respondents believed sexual harassment would become more of an issue once people returned to offices, and significant numbers expressed a lack of confidence in their employer's stance on the issue. Nearly a third were unsure whether their company took sexual harassment seriously enough, and just under 20% felt it did not. Against the backdrop of strengthened legal protections and higher expectations on employers, these findings remain a clear reminder that there is still work to do to protect our people and to create safe, respectful workplace cultures.

This Code can help you do just that.

Read more about our surveys and access the timeTo Toolkit:
www.timeto.org.uk



manifesto

#timeTo

No one should have to experience with sexual harassment.

Everyone working in our industry – regardless of age, gender, ethnicity, sexual orientation, socioeconomic background, role or level – should be free to work within a safe environment without fear of harassment.

No one should have to work in an environment which breeds or allows unwanted sexual attention, behaviour or abuses of power. This is a fundamental and infallible truth, and one championed by the founders of timeTo: the Advertising Association, NABS and WACL.

It's time to put a permanent end to sexual harassment within the UK advertising, media and marketing industry, and across the nation.

timeTo *come together*
timeTo *change things for the better*
timeTo *put an end to sexual harassment*

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timeTo

definitions

What is sexual harassment?

The Equality Act 2010 defines sexual harassment as unwanted conduct of a sexual nature, which has the purpose or effect of violating the dignity of a worker, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

The crucial word in the definition is 'unwanted'.

The legislation covers sexual harassment that takes place in person and virtually. There is not a separate piece of legislation specifically around online sexual harassment. It may help to consider that online sexual harassment can be described as unwanted sexual conduct on any online platform.

In our first timeTo survey, there were many calls for greater clarity on what constitutes sexual harassment, both from those who have been sexually harassed and the wider community.

The following is a list of examples of sexual harassment, some of which were informed by timeTo's 2020 research findings. While this is an extensive list, it is not exhaustive.

- a) Sexual comments which could be about a person's appearance or body parts
- b) Sexual jokes or questions about a person's sex life
- c) Suggestions that the professional position a person holds or achieves is the result of sexual attractiveness or activity
- d) Sharing sexually inappropriate images or videos such as pornography or obscene images
- e) Promises in return for sexual favours
- f) Threats (of any type e.g. career damage) if sexual favours are not granted
- g) Unwelcome physical contact including inappropriate touching such as patting, rubbing, or purposefully brushing up against another person
- h) Sexual assault
- i) Commenting on a colleague's appearance, either in person or during video calls
- j) Commenting on other people in the background of video calls in a sexualised or discriminatory way
- k) Winking at colleagues in person or during video calls
- l) Inappropriate or indecent exposure in person or during video calls
- m) Unsolicited and/or inappropriate communications through messaging apps, including channels such as Slack/Google Chat/WhatsApp/Teams and via other private messaging or social media platforms
- n) Emails or text messages requesting sexual favours
- o) Encouraging a culture of sexual harassment and sexism in the workplace by making demeaning comments about women, for example demanding that they be 'sexier' or men be 'manlier'; and
- p) Stalking on personal social media accounts.

For more examples of sexual harassment and inappropriate behaviour, see page 13.

A code for Everyone

This is a code for everyone. Whether you're a senior leader or HR; whether you're a newly promoted line manager or just starting out in the industry; a client or customer; freelancer or contractor – regardless of age, gender, role or discipline, this is for you. This is a code for every member of the advertising and marketing industry. It is up to all of us to ensure that everyone we work with is physically, psychologically and emotionally safe wherever and whenever they work. There are no exemptions or special rules for people of a certain status.

We must take responsibility for our own behaviour and for the power we have to oppose sexual harassment.

Harassment in all its forms has a serious and lasting impact on people's mental and physical health, as well as on workplace cultures and productivity. As we continue to map out how we work, with hybrid, home working and office working all happening in our industry, it's our collective duty to protect our colleagues and team members.

We must take responsibility for our own behaviour and for the power we have to oppose sexual harassment and all forms of harassment.

No one should have to put up with sexual harassment. No one should have to put up with any form of harassment. The responsibility does not lie solely with those who have been harassed.

If you are a leader of a company, you should develop, publicise and genuinely adhere to your policies and processes so that you can deal fairly and promptly with instances of sexual harassment. You should also develop a company culture which does not tolerate it. A safe, trusting and open environment within which those who have been sexually harassed, witnesses or those accused of sexual harassment, can approach you with confidence and faith that the company will investigate all allegations fairly and promptly. In addition to the human misery it creates, sexual harassment leads to poor morale and performance, lost productivity, greater levels of stress and risk of stress-related illness, lack of respect for management, reputational damage and the risk of legal claims and compensation awards.

If you are in a senior position, you have an extra obligation to set an example and not to use your power over people more vulnerable than you. Make it clear the standards of behaviour expected of everyone in the workplace.

It is an **employer's legal obligation to prevent sexual harassment** happening in their organisation in line with the Workers Protection Act 2023.

By signing up to **timeTo** as an endorsing company, you commit to adhering to this code and cascading it across the business, leading from the top to create a safe and respectful culture and taking all reasonable steps to prevent sexual harassment..

We all have a duty to speak up.

The responsibility does not lie solely with those who have been sexually harassed. We offer guidance on the best ways to do this further in the Code, but failure to address it is not good for anyone in the long run. It might lead to other people being sexually harassed by the same harasser or it might encourage the perpetrator to ramp up their bad behaviour. Speak up and stop it becoming acceptable behaviour.

We all need to be open to hearing feedback on our behaviour, even if our intentions were good, in order for change to occur.

Adhering to this Code of Conduct does not oblige us to create humourless, formal, suspicious workplaces. On the contrary, properly adopted, we believe it will create happier companies where no-one's fun comes at the expense of anyone else.

This document is for guidance only and should not be used as a substitute for specific legal advice

taking action

a) for management and HR

We recommend that the issues and principles we highlight below are addressed within your company policies and processes but we acknowledge that you may wish to write these in your own style and indeed you may wish to go further. There are clear legal risks associated with sexual harassment in the workplace including a claim to an employment tribunal if an employer has not taken reasonable steps to prevent the misconduct. From October 2026, this will change to all reasonable steps, including prevention of harassment from third parties. Your company is obliged to address and deal with the harassment. Sexual harassment is prohibited under legislation including the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023 and Protection from Harassment Act 1997. You also have a duty of care to keep your staff safe.

Plus, of course, there is a moral duty regarding the wellbeing of staff and the company's reputation may also be at stake. A company that values its people will want to eradicate this type of behaviour and make sure it never happens again.

1. Make clear your stance on sexual harassment (and other forms of harassment) with your employees, clients and everyone you work with. Many companies choose to address sexual harassment within a broader bullying and harassment policy. This is fine and indeed standard practice but our findings suggest that there is merit in addressing sexual harassment specifically and explicitly. This could be done by highlighting a specific section on sexual harassment within the company's bullying and harassment policy.

You can download a draft policy template from the **timeTo** Toolkit – www.timeto.org.uk/toolkit

2. Remind your managers and employees that their behaviour will be assessed to the same standards working from home as it would be in the physical workplace and that the usual policies apply. Update relevant policies to be specific about any potential blurring of boundaries:

- a) Clarify which digital communication platforms can be used between colleagues/clients/third parties.
- b) Enable employees to record meetings on your company video conferencing platforms in the absence of colleagues, should they wish to.
- c) Provide guidance and work with managers on agreed ways of working and what is considered to be 'out of hours'.

taking action

3. Applicable company policies such as bullying and harassment and grievance procedures, should specifically address the issue of 'victimisation'. Such policies should clearly highlight what protection and support is available for those involved in any bullying and/or harassment complaints. From April 2026, disclosures about sexual harassment will qualify as "protected disclosures" under whistleblowing law. This gives stronger protection to staff who make complaints or who participate in good faith in any investigation - they must not suffer any form of retaliation or victimisation as a result. Similarly, it should be explicit that anyone found to have retaliated against or victimised someone in this way, will be subject to disciplinary action. Our findings suggest that there should be greater emphasis on reassuring staff that they will be protected and supported when they speak out about sexual harassment.

4. Continually update any specific anti-sexual harassment policies to incorporate the risks of sexual harassment to reflect current and ongoing ways of working (including working from home and hybrid working). Provide clear guidance on online safety and unacceptable behaviours including "grey areas" like "banter". Make sure that your policies and processes are well known to all staff, including whenever they are updated. Your teams should know what to do if they encounter sexual harassment and what the likely course of events will be following a reported incident. This equally applies to someone accused of sexual harassment.

You can find template emails and a PowerPoint presentation for your all-staff meeting introducing timeTo, with sections to share your policies and procedures in the timeTo Toolkit.

taking action

Create further reporting opportunities:

If you haven't already done so, appoint an anti-sexual harassment ally – someone who is not HR or the CEO and who people would feel comfortable speaking to. If you can, have more than one and ensure the group is made of people from different backgrounds and of different ages to encourage any underrepresented groups to come forward. Also include different seniority levels, ensuring that those who are less senior are supported and backed.

Provide your anti-sexual harassment ally with training and notify your organisation of who and how they can be contacted.

Create an incident management plan and without compromising confidentiality, share if you can with your organisation if and how harassment is happening. Use this information to identify the risk areas and to educate your teams on its prevalence and ways of mitigating it happening. TimeTo's training educates on risk areas, what sexual harassment is and how to combat it.

Inform your teams of any organisational/group-wide online reporting and whistleblowing lines that are available. Such reporting lines would need to be confidential and secure, in compliance with data protection regulation.

Create safe and inclusive spaces and encourage your teams to speak up. You'll need to inspire confidence that your organisation can be trusted, even though creating safe and inclusive spaces won't happen immediately. Ensure that leaders and line managers are authentically working towards an environment in which everyone is included.

Take an intersectional approach: sexual harassment in the workplace can reflect power imbalances and can be part of a spectrum of disrespect, discrimination and inequality. Ensure that your managers are trained in understanding and spotting all forms of harassment and they are equipped to lead and act on any internal grievance and disciplinary processes.

If the issue of sexual harassment has been raised, it's your priority to do all you reasonably can to deal with the harassment and to ensure that teams are safe however they work, be that from home, in the office or hybrid working.

Have an 'always aware' approach. Sexual harassers are often predatory and can exploit weaknesses in any system and processes. Their approach also evolves to find new ways of harassing when barriers are put in their way. When evolving your systems and processes, make this part of your risk management plans.

taking action

timeTo supporters commit to enrolling their leadership team onto timeTo's training. Our training sessions provide a safe and supportive space in which to learn about sexual harassment. The sessions aren't restricted to leadership: the majority of companies have booked all employees onto training to ensure reasonable steps are taken to prevent sexual harassment and drive organisational awareness and culture change:

www.timeto.org.uk/training

Senior management sets the culture. They should ensure that HR departments are empowered to enforce the company policy, whatever the consequences or whoever the alleged perpetrator. If you don't have an HR department, then you should instead have designated people that can and will deal with the issues as they arise.

Handle the difficult conversations appropriately. Depending on the circumstances, an informal approach may be more appropriate to encourage an employee to speak up about harassment and it can also allow the accused to speak from their perspective. You can ease the stress in the situation by being empathetic. A formal process can be a daunting prospect and may not be the preferred initial route by the person speaking up so you may need to be open to informal approach if appropriate and depending on the severity of the issues raised.

Offer support. Managing each individual's wellbeing should be an employer's priority and throughout an investigation, employers should offer support to all individuals involved. The type of support offered may vary depending on the severity of the accusations. For example, whilst mediation can be a great way of healing relationships, it may not be appropriate in some instances and you should take guidance from all involved before recommending this. For those finding the situation difficult, you could offer confidential counselling perhaps via your company Employee Assistance Programmes or the NABS Advice Line.

People should never be made to feel that their career, at their current company or a future one, will be disadvantaged because they have come forward to report an incident.

In extreme cases, where an employer believes that the conduct may amount to criminal behaviour such as rape, sexual assault, stalking, indecent exposure or offensive communications it may be necessary to report the matter to the police and co-operate with a criminal investigation or prosecution.

taking action noise

NDA

The law on non-disclosure agreements and confidentiality clauses in settlement agreements is complex. However, under section 43 of the Employment Rights Act 1996, an NDA or confidentiality clause will be void where it seeks to prevent an individual from making a protected disclosure or from reporting criminal activity. From April 2026, disclosures relating to sexual harassment are explicitly recognised as protected disclosures under whistleblowing law.

A misuse of NDAs in relation to sexual harassment can create a culture in which systemic issues remain unaddressed. Sexual harassment is normalised, and those who have been sexually harassed may feel unable to speak out or may end up being wrongfully silenced. The power imbalances that are often a product of harassment are reinforced.

timeTo strongly advocates against the use of NDAs in sexual harassment cases.

Alongside the Equality and Human Rights Commission, we also recognise that those who have been sexually harassed may want to protect their confidentiality and the details on the discrimination. This isn't necessarily the outcome that we advocate but it may be something that a person wishes to pursue as part of the resolution and ultimately, that is their decision to make.

Individuals who have been asked to sign an NDA in relation to sexual harassment can call the NABS Advice Line for guidance and support. NABS can in turn direct individuals to solicitors for independent legal advice. *

NABS' Advice Line offers support and guidance to everybody affected by sexual harassment: those who have experienced it, witnesses to it, those managing investigations and alleged perpetrators. NABS can also help those who have been affected by hearing about sexual harassment while reading any material about it or attending training sessions on the subject. Please direct your employees to NABS for help: **0800 707 6607 / support@nabs.org.uk**

Policy

As of October 2026, employers will be directly liable if an employee is sexually harassed by third parties such as clients, freelancers or suppliers, unless the employer can show they took all reasonable steps to prevent it. Your policy should include and reference, as appropriate, third parties and needs to be clear about expected behaviours, reporting routes and consequences. Review your third party contracts and ensure they are aware of your policy.

*[Source: The Equality and Human Rights Commission. Turning the tables: ending harassment at work: <https://www.equalityhumanrights.com/en/publication-download/turning-tables-ending-sexual-harassment-work>]

taking action

When writing your policy, it is important to make the following points clear to your employees:

- *It's never appropriate to initiate unwanted physical contact: touching legs, arms, hands, faces or intimate body parts*
- *It's never appropriate to send overly personal or suggestive communications to a colleague, whatever their level or role*
- *It's never appropriate to request or suggest sexual favours as a means to promotion, salary increases or for business gains*
- *It's never appropriate to hire or promote a person (or not to do these) based on their level of physical attractiveness*
- *It's never appropriate to verbally or otherwise sexually objectify anyone's body; by using innuendos, suggestive or lewd comments or otherwise*
- *It's never appropriate to ask personal or intimate questions about someone's clothing choices*
- *It's never appropriate to ask someone about their sexual habits, sexuality, gender or push for them to share their sexual experiences*
- *It's never appropriate for someone in a junior role to be asked by someone in a senior role to visit their home, hotel room or other place of stay alone, nor is it appropriate for someone in a senior role to visit someone in a junior role in their place of stay, uninvited*
- *It's never appropriate to exploit or wield your power over others* • *It's never appropriate to use a person's gender, sexual orientation, ethnicity or perceived attractiveness as a way to impress clients and for business gains*
- *It's never okay to excuse someone's behaviour because they are an important customer, client or have seniority*
- *It's never okay to excuse someone's behaviour because they are held in high esteem e.g. they come up with big ideas, bring in income, run a huge team, win new business* • *It's never okay to excuse bad behaviour as 'banter'*
- *It's never okay to excuse someone's behaviour because...*
 - ...that's 'just the way they are'*
 - ...of their gender*
 - ...of their sexual orientation, even if it's different to your own*
 - ...the harassment wasn't physical*
 - ...of impaired thinking due to drug or alcohol use*
- *It's never okay to excuse someone's behaviour because it was away from the office and in environments such as...*
 - ...pubs*
 - ...parties and social occasions*
 - ...business trips and overnight stays*
 - ...award shows*
 - ...festivals and conferences*
 - ...online*
- *It's never okay to rely solely on non-verbal cues as consent for sexual behaviour; relying on face and body movements alone is not enough and dangerous. Get definitive and clear consent.*

Note: these points are built from verbatim responses to the first timeTo survey carried out in March and April 2018

taking action

b) for those who have been sexually harassed

Your employer is obliged to take whatever reasonable steps they can to prevent and then deal with any notified harassment. It is their legal duty to protect the health, safety and wellbeing of employees and provide a safe place and system of work. Therefore, employers should put in place reasonable measures, policies and procedures to try and ensure that sexual harassment does not happen.

Your employer must also take seriously any notification that there has been workplace (whether virtually or at the offices or at premises outside the office) sexual harassment and deal with that as appropriate, in accordance with internal policies.

There are a number of changes coming into law in 2026:

- From April 2026, disclosures about sexual harassment are protected under whistleblowing law. This means anyone who raises concerns about sexual harassment - whether about their own experience or someone else's - has strengthened legal protection from retaliation. Employers must ensure reporting and whistleblowing processes are safe, confidential and trusted, and that no individual suffers detriment for speaking up.
- From October 2026, employers will have to show they took all reasonable steps to prevent sexual harassment, requiring more comprehensive evidence of training, prevention, monitoring and culture-building. Employers may also be legally liable where an employee is sexually harassed by a third party, unless the employer can show they took all reasonable steps to prevent it. Policies and training must therefore clearly address third-party behaviour and escalation routes.

Sexual harassment is **never your fault**. The onus on making change lies with those committing the harassing, and employers to investigate, take action and instil a positive company culture. The below are some considerations for how you can navigate difficult situations and best look after yourself:

- Read your company's sexual harassment policy, if your employer does not have a specific sexual harassment policy, please refer to their bullying and harassment policy. Contact your HR department if you are unsure where to find this.
- In all instances, we recommend making a detailed note of what happened, including how it made you feel, what was said, time, date and any witnesses. This can be beneficial as an outlet for your thoughts, but also as a step towards your next actions.
- Depending on the severity of the harassment or if the harassment is reoccurring, you may also need to put it formally in writing, keeping a copy for yourself, and follow your company's grievance or bullying and harassment procedure, so keeping a diary or list detailing the times you have been harassed will become a useful reference for the reporting and investigation process
- At any point in the reporting process, from first informal conversation with a trusted line manager or HR representative to formal investigation, you can have a colleague or other neutral representative accompany you for support.

taking action

If the matter is serious enough to warrant a claim in an employment tribunal you may have a time limit of only three months in which to notify of your claim. The NABS Advice Line can give you support around this from a practical and emotional perspective, so do call them as early on as you can.

- Sexual harassment can cover a range of unwelcome behaviours from seemingly trivial banter, to criminal sexual assault. By confronting the harassment in an appropriate and safe way - a way that is right for you - you will give confidence to others to speak up too.

Refer to pages 4 and 12 for examples of what actions could be considered as harassment.

- If you feel like you're being harassed, and you feel safe and confident to do so, you could approach the person directly to share the impact of their actions and behaviour. It can be a difficult conversation to have. The focus would be to make it clear you do not find their actions acceptable. It may be useful to cite this code. Whatever action you take, your safety and wellbeing must be the priority.

If the moment moves quickly and you are in shock, it's okay to draw the harasser's attention back to their unacceptable behaviour, whether that be a week, two weeks or however long after it happened and tell them it was unwanted and unwelcome. Again, your safety and wellbeing are paramount here; only do this if you feel safe in doing so. If you feel that the harasser is too senior, or their behaviour is too threatening for you to speak up, then seek help elsewhere if confronting them is not possible.

We recommend using company-approved digital communications platforms when communicating with colleagues and clients so your employers can monitor activity. When using your company-approved digital platforms, there may be options to choose a background on video calls so your colleagues can't see your home. This feature could be something you explore if you don't feel comfortable with colleagues seeing where you live. If you experience harassment online, it is also recommended to save/screenshot any communications.

- If your harasser contacts you directly and you don't feel comfortable communicating with them, it's okay to decline the offer to talk and direct them back to the work communication channels. It's okay to take the stance of not answering unwanted calls and ending calls that make you feel uncomfortable. If necessary, you may wish to explore using blocking functions on your personal channels.

taking action

If anyone who makes you feel uncomfortable attempts to add your personal social media accounts do not feel obliged to add them. If they are already a contact, and you feel comfortable doing so, you could consider limiting their viewing and contact permissions or delete or block them entirely. Only do this if you consider it is safe to do so.

- If you're being asked to meet up alone by anyone who is making you feel uncomfortable, we recommend you decline and inform your HR department/line manager. It is important to then follow company (and government) procedures. If you do decide to meet, we would strongly advocate doing so with another work colleague present and to meet in a public place.

You need to be aware that, once you have made an official complaint, your company is obligated to investigate it and deal with it in accordance with the Acas Code of Practice on Disciplinary and Grievance Procedures.

- You should be prepared that an investigation may fail to substantiate your allegation. This doesn't mean you are wrong to come forward. Staff who make complaints or who participate in good faith in any investigation, must not suffer any form of retaliation or victimisation as a result and will be protected under whistleblowing law.
- In extreme cases, the harassment may amount to criminal conduct such as sexual assault, stalking, indecent exposure or offensive communications, meaning it may be appropriate to report it to the police.
- Consider how you want the matter resolved and what support you need from your company. What outcome do you want and how can your company and potentially, the harasser work towards this outcome. Your company will also have to be guided by their policies including bullying and harassment and ACAS Code of Practice on Disciplinary and Grievance Procedures.

Managing each individual's wellbeing should be an employer's priority throughout this process for all individuals involved. The type of support offered may vary depending on the severity of the accusations. For example, whilst mediation can be a great way of healing relationships, it may not be appropriate in all instances and you can guide your employer on what you would find most helpful.

If you are finding that the whole situation is impacting on you emotionally, ask your employer if they have a company Employee Assistance Programme that would offer confidential counselling or contact the NABS Advice Line for empathetic, impartial and confidential guidance and support.

Be aware that if you enter into discussions with your company about a settlement agreement, you will need legal advice. This isn't an outcome we advocate, but a settlement agreement may be something you want to pursue as part of the resolution and ultimately, that is your decision to make. You can contact the NABS Advice Line for guidance and support, NABS can in turn direct individuals to solicitors for independent legal advice.

taking action.

c) for witnesses of sexual harassment

Spotting the offensive behaviour is the first step in dealing with it, whether you're experiencing it yourself or seeing it amongst colleagues. Sexual harassment can be dressed up in humour or dismissed as a joke or banter, making it easy to miss or not take seriously. Recognise this behaviour for what it is and take action.

If you think that you have witnessed sexual harassment and are unsure of what constitutes sexual harassment, including online sexual harassment, read the examples on pages 4 and 12.

- Speak up. As an observer of this type of behaviour, it can be much easier to just pretend it's not happening and ignore it. After all, it may bring you unwanted attention or bring you into a situation you don't want to be a part of. And, as uncomfortable as it may feel to become involved, in the longer term, it will make you feel much more uncomfortable to know something was happening to a fellow colleague and you failed to act.
- If you feel comfortable to do so, tell the person you don't find their behaviour funny or appropriate, or point out the offence or impact. Give them an insight into their behaviour, they may simply need a new perspective on what is and isn't socially acceptable.
- Offer allyship and support: practical and emotional if you can to those impacted by this type of behaviour
- Talk to a senior leader or HR so that they can clarify to the organisation what is and isn't acceptable behaviour.

Look after your own wellbeing and safety. Talk to NABS for support and guidance with your emotional wellbeing as well as any HR issues that you may be concerned with and of course how you can report sexual harassment that you have witnessed. If you report it, you'll be protected under whistleblowing law from victimisation and retaliation.

The timeto Active Bystander training provides safe, actionable tools for spotting, challenging and stopping sexual harassment - Ask your employer about the training or contact the timeTo team - timetotraining@nabs.org.uk

You may also want to suggest to the person whom you believe is being harassed that they get in touch. Call: 0800 707 6607 or email support@nabs.org.uk

taking action

d) for people who fear they have behaved inappropriately

If you are unsure as to whether you have behaved inappropriately, get some feedback on that behaviour. It may not be appropriate to speak directly to the person you have potentially impacted with your behaviour so if there were others present, ask for their perspective in the first instance. If there were no other people present then this will need to be handled sensitively and if it's not appropriate to speak to the person directly, then consider involving another party such as someone from HR to manage such conversations. You should also read through the list of possible examples of sexual harassment on pages 4 and 12 of this code to consider whether you may have acted in any of the ways suggested.

- If it's determined that your behaviour was unacceptable and someone has been impacted, apologise immediately and sincerely and change your behaviour from that point forward. When apologising avoid language such as "I'm sorry you feel that way" as this puts the onus onto the victim rather than taking responsibility for your actions.
- Consider and reflect on your behaviour and understand what led to these circumstances. Be clear about how you will ensure this behaviour won't happen again; consider whether you need training or to seek other kinds of help. Be open to suggested ways of reforming.
- Be realistic. You may need to take professional legal advice if your behaviour is considered sexual harassment.
- Speak to someone to work out the best course of action to remedy the situation. The NABS Advice Line can offer you some perspective and impartial, confidential advice. Call: 0800 707 6607

taking action

e) for people who may have been wrongfully accused

As difficult and uncomfortable as it may be, your company will need to establish the facts of the accusation made against you. They are obligated to investigate a complaint and deal with it in accordance with their policies including bullying and harassment and the ACAS Code of Practice on Disciplinary and Grievance Procedures.

Such a process should also provide you with the opportunity to be heard and defend the allegation fully to your employer. You also have the right to appeal an outcome.

If you are unsure about what constitutes sexual harassment, read through the list of possible examples of sexual harassment on pages 4 and 12 of this code to consider whether you may have acted in any of the ways suggested.

Managing each individual's wellbeing should be an employer's priority throughout this process for all individuals involved. If you are finding that the whole situation is impacting on you emotionally, ask your employer if they have a company Employee Assistance Programme that would offer confidential counselling. Also consider speaking to family, friends and seek professional support, if needed

Be realistic. You may need to take professional legal advice if your behaviour has been considered sexual harassment and you believe you have been wrongfully accused

Speak to someone to weigh up your options and work out the best course of action. The NABS Advice Line can offer you some perspective and impartial, confidential advice. Call: 0800 707 6607

Creating a safe future

Society has been through a shift in recent years, and the conversation around discrimination and harassment has moved on considerably since we first established timeTo. Tolerance for inappropriate behaviour is lower than it once was, and more people are prepared to call it out when it happens. But we need to do more to eradicate sexual harassment for good.

We're all responsible for setting expectations and boundaries around respect and appropriate behaviour. Together, we must and we can create a culture where racism, homophobia, sexism and other forms of discrimination and multiple oppressions are no longer tolerated at all, working towards a future where they no longer exist.

- Proactively understand what is happening within your own company, don't wait for people to come forward or for a situation to occur, or assume it's not taking place because you've not heard about it.
- Live by your company values. Your progress towards eradicating sexual harassment will be severely undermined if you make allowances for certain people who are held in high esteem, if you laugh along with the crowd at someone else's expense or hire a sexist comedian for your company Christmas party.
- Manage change constantly. Office and hybrid working models are more of the norm now. Help to allay any confusion, fears and anxieties, apprehensions and feelings of overwhelm by keeping your teams informed of your plans for evolving ways of working. Encourage questions and feedback along the way to help manage expectations.

Start with a positive approach by clarifying what constitutes expected behaviour when working from home, in the office or hybrid working. Have a zero-tolerance approach to sexual harassment, alongside all forms of bullying, harassment and discrimination, and ensure that correct standards of behaviour are communicated regularly and demonstrated by leadership.

Build lone working into your risk assessments. Social distancing, when it's in effect, and having less people in the office brings risks and opportunities for harassers. Introduce a buddy system so that everybody's whereabouts are known, and that people can raise the alarm if necessary.

Promote the use of official communications channels, such as Teams, as opposed to private messaging services. Clarify with your teams where digital boundaries can be blurred and empower people to keep their digital spaces as safe as possible.

- Empower your HR department. HR should not be faceless within your organisation. They need to be part of influencing company culture for the better and given the autonomy to ensure that all policies and procedures are abided by fairly.
- Create 'anti-harassment champions' akin to a designated safeguarding lead in schools, who are trained to deal with sexual harassment and choose the correct approach for the organisation to take in the circumstances, widening the options beyond speaking to a line manager or the HR department.
- Provide a phone-line or build online reporting tools to allow anonymous complaints with no fear of reprisals but note that anonymity should not be encouraged across the board as they prevent an employer being able to fully investigate and the accused from being able to fully understand the case against them.

- Provide all staff with training to recognise and remove sexual harassment, starting with line managers. timeTo training sessions are ideal for this; our training is updated regularly to reflect changing working practices and delivered by experts in the field.
 - timeTo sexual harassment awareness training starting at £1395+VAT
 - timeTo active bystander training starting at £1395+VAT

Contact our team to discuss - timetotraining@nabs.org.uk

- Freelancers and contractors must be empowered to use the same reporting structures as employees. They should also be clear about the company's policies upon induction.
- Inform clients and suppliers of your values, policies and ways of working so they are clear on what is acceptable and unacceptable behaviour within your company - remember prevention of sexual harassment also includes protecting staff from being harassed by clients and third parties.
- Many respondents in our surveys expressed a belief that a more diverse and gender balanced management line-up would have a positive impact on the incidence of sexual harassment and also how companies deal with it.

You will have ideas of your own; we'd love to hear and share them to ensure that we can all learn and benefit from best practice: timetoinfo@nabs.org.uk



5. Sources of support and advice

The following is a list of organisations who may be able to help you seek advice and support on issues around sexual harassment.

Specific ways timeTo can help include:

Training: practical guidance on sexual harassment at work to increase your teams' understanding of what is and what isn't acceptable in the workplace and challenge inappropriate behaviour when they see it.

Toolkit: to embed key messages within your organisation from this code of conduct

Code of conduct: share this document with your entire organisation to give information and guidance to all

Specific ways NABS can help include:

Providing information and guidance on what constitutes sexual harassment and what you can do if you have been subject to sexual harassment, witnessed it, if you fear you have behaved inappropriately or if you have been wrongfully accused of sexual harassment.

Providing support around the emotional impact sexual harassment may have.

Sign-posting to any necessary specialist organisations

NABS Advice Line: 0800 707 6607; email: support@nabs.org.uk

Support available

ACAS

Provide information, advice, training and conciliation helping to prevent or resolve workplace disputes <http://www.acas.org.uk>

- Acas Helpline: 0300 123 1100 <https://www.acas.org.uk/contact>
- Guidance on sexual harassment <https://www.acas.org.uk/sexual-harassment>
- Guidance on whistleblowing in the workplace <https://www.acas.org.uk/whistleblowing-at-work>
- Code of Practice on Discipline and Grievance <https://www.acas.org.uk/acas-code-of-practice-on-disciplinary-and-grievance-procedures>

CIPD

The professional body for HR and people development. www.cipd.co.uk

- Standing up to sexual harassment #Withyou: has some useful resources for HR professionals on sexual harassment <https://www.cipd.org/uk/about/public-policy/our-calls-for-action/preventing-sexual-harassment/>

CITIZENS ADVICE

Provides free, confidential and independent advice to help people overcome their problems. <https://www.citizensadvice.org.uk>

- Sexual harassment: <https://www.citizensadvice.org.uk/law-and-courts/discrimination/taking-action-about-discrimination/taking-action-about-harassment/Victimisation>

[https://www.citizensadvice.org.uk/law-and-courts/discrimination/check-if-youre-protected-from-discrimination/step-3-check-the-type-of-discrimination/Rape and sexual assault](https://www.citizensadvice.org.uk/law-and-courts/discrimination/check-if-youre-protected-from-discrimination/step-3-check-the-type-of-discrimination/Rape-and-sexual-assault): <https://www.citizensadvice.org.uk/family/gender-violence/rape-and-sexual-assault/>

IPA

The professional institute for advertising, media and marketing agencies. Incorporated by Royal Charter. <http://www.ipa.co.uk>

- The IPA has published a Code of Best Practice on Dignity at Work for its members. IPA member agencies with legal enquiries about harassment in the workplace can seek advice from Juliet Bawtree, Associate Director, Legal and Public Affairs (Employment).'

FIX THE GLITCH a UK charity working towards ending abuse online

THE EQUALITY HUMAN RIGHTS COMMISSION

An independent statutory body with the responsibility to encourage equality and diversity, eliminate unlawful discrimination, and protect and promote the human rights of everyone in Britain. Sexual harassment and harassment at work technical guidance.

EQUALITY ADVISORY SUPPORT SERVICE

Can provide advice and guidance if you think you may have been discriminated against. Helpline: 0808 800 0082 <https://www.equalityadvisoryservice.com/>

GALOP

Provides a free, confidential and independent service for all LGBT+ people who have experienced sexual assault, violence or abuse, however or whenever it happened. Helpline: 0800 999 5428 <https://www.galop.org.uk/>

RIGHTS OF WOMEN AT WORK

Offer some guidance on what to do if you're experiencing sexual harassment at work. They also provide free employment legal advice to women in England and Wales experiencing sexual harassment at work. Advice line: 020 7490 0152 <https://www.rightsofwomen.org.uk/>

RAPE CRISIS

Offer a free confidential emotional Live Chat support service for females who have experienced sexual violence in England or Wales. Website contains contact numbers for centres and basic guidance about rape and sexual violence for survivors, friends and family. Helpline: 0808 802 9999 <https://rapecrisis.org.uk/>

RAPE CRISIS SCOTLAND

Supports those who are living in Scotland

Helpline: 0808 801 0302

ROSA

A charitable fund set up to support initiatives that benefit women and girls in the UK

<https://rosauk.org/>

- The Justice and Equality Fund, managed by Rosa, was set up to end the culture of harassment and abuse <http://www.rosauk.org/blog/justice-and-equality-fund/>

Aims of the fund include working to make sure people know their rights, access to good quality support and support for legal cases including funding. To register an interest in applying for grants email info@justiceequalityfund.org

SURVIVORS UK

Helps to support men, trans, and non-binary people who have experienced sexual violence. They provide one-to-one counselling services (delivered face to face, by telephone and online), groupwork counselling, and an online national helpline.

- They also provide a searchable database of specialist support services for men which you can use to find support in your local area. <https://www.survivorsuk.org/>

SUZY LAMPLUGH TRUST

A charity that works towards reducing the risk of violence and aggression through campaigning, education and support. They offer some guidance on how to stay safe at work.

- Their National Stalking Helpline gives practical information, support, and advice on risk, safety planning and legislation if you're a victim of stalking

Helpline: 0808 802 0300 <https://www.suzylamplugh.org/>

VICTIM SUPPORT

A charity dedicated to supporting victims of crime and traumatic incidents in England and Wales. They provide guidance on different types of sexual harassment and the support available.

- You can get help by calling their helpline, get support online or by contacting your local victim support office.

Support line: 0808 168 9111 <https://www.victimsupport.org.uk/>





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No one should have to put up with sexual harassment; anytime or anywhere.

For free, confidential and impartial advice and support, for anyone working in the advertising, marketing and media industry, call the **NABS Advice Line on 0800 707 6607**, 9am-5.30pm on week days.