

Sexual Harassment Law Changes (October 2026)

Session Overview

For all employees, managers and leaders.

Purpose:

- Understand the strengthened legal duty: employers must take **all reasonable steps** to prevent sexual harassment from **30 October 2026**
- Understand new liability for **third-party harassment** (customers, clients, contractors)
- Know how to recognise, report and respond to harassment
- Build a safer, more accountable workplace culture

COURSE CONTENTS

1. What the Law Says

Key Changes:

- Duty rises from *reasonable steps* to **all reasonable steps** (higher bar; proactive not reactive)
- Employers become **directly liable** for harassment by third parties if they have not taken all reasonable steps to prevent it
- Tribunals may uplift compensation by **up to 25%** if the duty is breached

Discussion:

- What does “all reasonable steps” look like in your workplace?
- Why reactive approaches are no longer enough.

COURSE DURATION: 3 Hours

2. What Sexual Harassment Looks Like

Definition: Unwanted conduct of a sexual nature that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Examples:

- Comments about appearance
- Sexual jokes or “banter”
- Unwanted touching
- Sexual messages, images or online behaviour (including AI-generated content)
- Behaviour from customers, clients or contractors

Activity: Small-group exercise: “Is it harassment?” using 6–8 short scenarios.

3. Recognising Subtle & Emerging Risks

- “Banter” culture normalising inappropriate behaviour
- Power dynamics (manager → staff, senior → junior, client → employee)
- Digital misconduct: image-based abuse, inappropriate messaging, AI-generated sexualised images

www.oaktree-training.co.uk



- Lone working, customer-facing roles, events, travel

Mini-case study: Review the Acas example of a workplace failing to take all reasonable steps and discuss what should have been done differently.

4. Reporting & Responding

For all staff:

- How to report concerns
- What happens after a report
- Confidentiality vs anonymity
- Protection from victimisation

For managers:

- How to receive a disclosure safely
- What to do in the first 24 hours (document, escalate, protect)
- When the harasser is a **customer or contractor**
- Trauma-informed responses (avoid minimising, blaming, or “toughen up” messages)

Activity: Paired role-play: “Receiving a disclosure”.

5. Bystander Intervention

Teach the **4 D’s**:

- **Direct** – challenge behaviour safely
- **Distract** – interrupt or redirect
- **Delegate** – get help from a manager
- **Delay** – check in afterwards

Short practice using workplace-specific scenarios.

6. What “All Reasonable Steps” Means for Us

Based on Acas and EHRC guidance, this includes:

- Up-to-date sexual harassment policy referencing the 2026 duty
- Regular, meaningful training for all staff and managers (not one-off)
- Clear reporting routes

- Evidence that staff have read the policy (signed acknowledgement)
- Risk assessments covering online and in-person risks
- Controls for third-party interactions (client behaviour clauses, escalation routes)
- Active monitoring of culture, not just reacting to incidents

Group exercise: “What steps do we already take? What’s missing?”

7. Personal Commitments

Participants write down:

- One behaviour they will adopt
- One action they will take to support a safer culture

Optional: collect anonymous commitments to display internally.

8. Q&A and Close

Summarise key messages:

- Prevention is now a **legal duty**, not a best practice.
- Third-party harassment is now a **legal risk**.
- Everyone plays a role in creating a safe workplace.

Contact for more information

or to book:

Call: 01284 763040

Email: sales@oaktree-training.co.uk