



Checklist: Sexual harassment and harassment law changes



Produced in partnership with [Juliet Irving, Director of HR Operations at Impact HR](#), this checklist is designed to help small and medium-sized employers get ready for the UK harassment law changes (October 2026) and meet the ongoing requirements.

We're still waiting on detailed guidance from the UK government but you can use this checklist as a practical starting point. But, do bear in mind that what's reasonable for your organisation will depend on things like your size, resources, sector, working environment and the risks your people face. So, please make sure you consult an HR professional or legal expert to check your approach. Juliet and the team at [Impact HR](#) would be happy to help.

Inform the business

- ☐ Make sure senior leaders, managers and HR understand that the legal duty around sexual harassment is rising from reasonable steps to all reasonable steps from 30 October 2026.
- ☐ Ensure the business also understands that third party harassment will be a bigger legal risk from 30 October 2026, including harassment by customers, clients, contractors, suppliers, service users and other non-employees.
- ☐ Set expectations internally by explaining that there's going to be an ongoing, active and evidenced approach to prevention.



Create or review your harassment policy

- ☐ If you don't have either a bullying and harassment policy that includes sexual harassment, or a separate sexual harassment policy, now's the time to create one.
- ☐ If you do have an existing policy, check whether it clearly explains what harassment is, what sexual harassment is, what unacceptable behaviour looks like and how concerns will be handled.
- ☐ Make sure your policy covers third party harassment and sets expectations not only for employees and managers, but also for customers, clients, contractors and other third parties where relevant.

Carry out a harassment risk assessment

- ☐ Identify where unwanted conduct, unwanted behaviour or harassment related to a relevant protected characteristic is most likely to happen in your organisation.
- ☐ Look at higher-risk situations such as lone working, isolated workplaces, customer-facing roles, home visits, power imbalances, travel, conferences, work social events and alcohol-related setting
- ☐ Consider whether some groups may face higher risk, including younger workers, apprentices or interns, depending on your workplace set-up.
- ☐ Turn your findings into an action plan with practical steps, owners and review dates.
- ☐ Again, store your risk assessment somewhere safe and secure that everyone can access when needed, wherever they're working from, e.g. an HR software like Breathe.
- ☐ And again, ask all workers to read and acknowledge the risk assessment and remember to add it to your onboarding workflow so that all new starters do this too.

Make it easier and safer to report harassment

- ☐ Give employees more than one way to report harassment or sexual harassment, so they are not forced to go through a single line manager.
- ☐ Consider whether anonymous reporting should be available in your business.
- ☐ Encourage people to report incidents and near misses, including situations where they felt at risk even if nothing happened.
- ☐ Reassure employees that complaints will be taken seriously and that they should not be disadvantaged for speaking up in good faith.



Train your whole workforce

- ☐ Deliver meaningful training that helps people understand what harassment and sexual harassment can look like in real working life, rather than treating it as a tick-box exercise.
- ☐ Use practical examples that reflect your own workforce, your sector and your risks.
- ☐ Cover what staff should do if they experience, witness or suspect harassment, including active bystander responsibilities.
- ☐ Provide refresher training and build key messages into induction for new starters.
- ☐ Keep records of who attended, when training was held and who delivered it, so you can evidence the reasonable steps to prevent harassment that you have taken.

Give managers extra support

- ☐ Train managers separately so they know how to recognise warning signs, respond appropriately, escalate concerns and avoid minimising issues.
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Handle complaints and harassment claims properly

- ☐ Investigate promptly, listen carefully, gather the facts and avoid jumping to conclusions.
- ☐ Consider what immediate steps are needed to protect the people involved while the matter is being looked into.
- ☐ Make sure any temporary arrangements are proportionate and do not disadvantage the person who raised the concern.
- ☐ Follow a full and fair procedure in line with the Acas Code where a formal complaint is being dealt with.
- ☐ Keep clear records throughout the process and store them securely.
- ☐ Where allegations are serious or involve senior people, consider independent HR or legal support so the process is objective and fair.



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Prepare for third party harassment

- ☐ Map where staff come into contact with third parties and where harassment by third parties is most likely to happen.
- ☐ Put visible standards in place for customers, clients and visitors, such as notices, booking terms, service terms or contractual wording.
- ☐ Train staff on what to do if a customer, client or member of the public behaves inappropriately, including when they can walk away, refuse service or escalate the issue.
- ☐ Make sure employees know they will be supported if they remove themselves from an unsafe situation.



Monitor patterns and review what's working

- ☐ Keep records of informal and formal complaints so you can spot patterns by location, team, client, manager or type of incident.
- ☐ Use staff surveys, one-to-ones and exit interviews to understand whether people feel safe, heard and confident to report concerns.
- ☐ Review whether your training, policies and reporting routes are actually working in practice, and change them if they are not.
- ☐ After any complaint, ask what the business should learn from it.

"The key message is that you should be able to demonstrate a big ongoing and active approach to prevention. It's not enough just to have a policy alone or to provide a training session every few years.

And this isn't just the case for large businesses. It's applicable to all employers, regardless of size."

Juliet Irving, Director of HR Operations, Impact HR



Need a hand putting all this into action?

Harassment prevention is an ongoing process, not a one-off task. Breathe can help by bringing together policy acknowledgements, sexual harassment training, risk assessments and essential HR tools all into one place.



Explore Breathe

For expert HR support, contact Juliet at juliet.irving@impacthr.co.uk, or visit the Impact HR website.

You can also find more free employment law resources on the [Breathe Employment Law Hub](#).