

New duty on employers to take all reasonable steps to prevent harassment at work (UK)

A Relatively Informal Guide

October 2026

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“New” mandatory preventative duty

In October 2024, a new duty came into force requiring employers to take “reasonable steps” to prevent the sexual harassment of their employees in the course of their employment (for ease, let’s refer to that as the “reasonable steps duty”). In the run up to that duty coming into force, there was an extremely unhelpful wall of silence from the government in terms of what an employer might actually be required to do to comply. This seemed to go against a fairly fundamental principle of good law – that those to whom it applies ought to know what they have to do to comply with it.

Given the lack of practical guidance from the government, we produced an entirely non-statutory, non-official and non-approved set of anti-harassment things to be seen to have thought about in the form of our Relatively Informal Guide. At the 11th hour, the Equality and Human Rights Commission’s (EHRC) [Technical Guidance](#) was released. Gratifyingly, although it still did not contain a list (comprehensive or otherwise) of steps that employers ought to take to comply with the reasonable steps duty, the EHRC included more detailed guidance in the final version, much of which echoed the practices and principles we had suggested in our Relatively Informal Guide.

Which brings us to the latest developments. From 30 October, as a result of the changes under the Employment Rights Act (ERA) 2025 the new mandatory duty will be amended to require employers to take “all” reasonable steps to prevent sexual harassment in the workplace, a much more onerous duty (which we shall call the “all reasonable steps duty”). “All” is an extremely unforgiving and inflexible standard. If employers fail to comply with this obligation, a Tribunal has the power to apply a 25% uplift in compensation where an employee succeeds in an Employment Tribunal claim. The EHRC also has the power to take action against an employer even if the employee does not ultimately bring a claim.

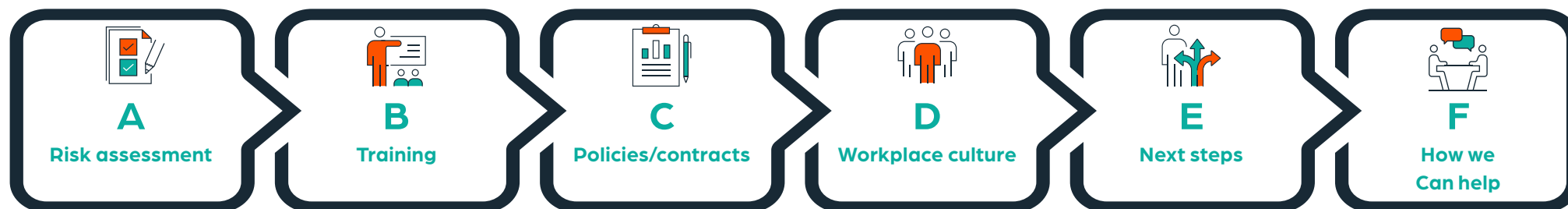
A new statutory obligation to take all reasonable steps to prevent harassment of employees (whether sexual or related to any other protected characteristic) by third parties will also be (re)introduced.

In a case of *déjà vu*, while the power for the government to make regulations specifying what steps employers will need to take to comply with the new strengthened duty will come into force in October 2026, it is not anticipated that the regulations themselves will come into force until 2027/2028 (likely following consultation) i.e. at least a year later (as per the government’s factsheet: [Preventing workplace sexual harassment: enabling regulations about ‘reasonable steps’](#)). Given the position taken by the government previously in relation to the reasonable steps duty, we can be tolerably certain that despite the gestation period of a rhinoceros, the promised regulations will still not be comprehensive of what may need to be done to comply. Which brings us back to that fundamental principle of good law we mentioned earlier – it seems utterly counter-productive that there should be this gap between being required to comply with this more onerous duty and being told how to do so. The indications which the government has given so far around what the regulations might include is fairly high-level/vague, but include the following steps:

- Carrying out assessments of a specified description
- Steps relating to the reporting of sexual harassment
- Publishing plans or policies of a specified description
- Steps relating to the handling of complaints

All in all, this tells us very little. Acas has produced some [guidance](#), which does at least refer to the all reasonable steps duty, but it is also fairly high-level. As such, this seems to be an opportune moment to reissue our Relatively Informal Guide, now updated to take into account the new strengthened duty to take all reasonable steps to prevent sexual harassment in the workplace, and to take all reasonable steps to prevent harassment of employees by third parties. It has been confirmed that the EHRC’s Technical Guidance will be updated to cover the new all reasonable steps duty, but no date has been given for when we should expect this (although presumably, this will only be released once the new regulations are in force). While we wait, we have based this guide on the current version and made assumptions, as far as possible, as to the position any such new guidance might take.

As ever, it remains entirely non-statutory, non-official and non-approved, but nonetheless hopefully useful. Do let us know what you think.



What is sexual harassment?

"Unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an offensive, intimidating or hostile environment for them". (Section 26(2), Equality Act 2010 (EqA 2010))

Remember, this is different from the "general" definition of harassment related to a protected characteristic (for which the definition is: "Unwanted conduct related to a protected characteristic (i.e. age, sex or race, etc.) that has the purpose or effect of violating a person's dignity or creating an offensive, intimidating or hostile environment" (from section 26(1), EqA 2010).

Examples of conduct "of a sexual nature" (from the [EHRC Technical Guidance on Harassment and Sexual Harassment at Work](#)):

- Sexual comments or jokes
- Displaying sexually graphic pictures, posters or photographs
- Suggestive looks, staring or leering
- Propositions and sexual advances
- Making promises in return for sexual favours
- Sexual gestures
- Intrusive questions about a person's private or sex life, or a person discussing their own sex life
- Sexual posts or contact on social media
- Spreading sexual rumours about a person
- Sending sexually explicit emails or text messages
- Unwelcome touching, hugging, massaging or kissing

As of April 2026, the ERA 2025 amended the whistleblowing provisions in the Employment Rights Act 1996 to provide that a report of sexual harassment will amount to a protected disclosure for whistleblowing purposes. The Tribunals have made it clear that employees who blow the whistle on sexual harassment could already fall within the whistleblowing provisions. It seems therefore that this change is unlikely to mean that many more individuals are protected, and that the rationale for the change is less about substantive difference and more about clearly signposting to those considering raising complaints etc., that they will be protected. So, while not many more people will be protected (and whistleblowing protections are little different from the victimisation provisions anyway) the number and profile of claims may grow, especially in regulated industries with formal whistleblowing reporting obligations.

Who is liable?

As with other breaches of the EqA 2010, employers are probably liable for sexual harassment committed by their employees during the course of their employment, even if the acts were done without the employer's knowledge or approval.

However, there is a defence available to an employer if it can demonstrate it took all reasonable steps to prevent the harassment.

Historically, this has been an extremely hard defence for an employer to run successfully. The government has explained that its rationale for changing the preventative duty to "all reasonable steps" is so that it is aligned with that defence, to avoid any implication that the employer's obligations in relation to the preventative duty for sexual harassment was set at a lower threshold than the defence for other EqA 2010 claims.



A. Risk assessment

The EHRC has been pretty unequivocal about the necessity of carrying out a risk assessment in order to comply with the reasonable steps duty. Seen objectively, that makes complete sense. You cannot know what constitutes reasonable steps to head off a risk unless you know its source and extent. This will be even more important when the obligation changes to taking all reasonable steps.

Any attempt to determine the steps your business should take must therefore realistically begin with an assessment of where you start from in that respect. Interestingly, this is not the first step in the EHRC's [Eight-step guide](#), which accompanies the Technical Guidance (it only makes an appearance at Step Three), but our view is that your risk assessment is the place to start. Completed in sufficient detail, this will form the cornerstone of your later efforts and so go a long way towards justifying the reasonableness of the steps you choose to take and not to take.

Paragraph 4.10 of the EHRC guidance states that "existing risk management frameworks traditionally used in the workplace health and safety context could be used for the process. Assessments should identify the risks and the control measures identified to minimise the risks". This is using "framework" in the loosest sense – in effect, little more than an idea on formatting. Though harassment can have health consequences, it is oversimplifying the issue to suggest that it is bound or even particularly likely to do so.

Resisting the temptation to conclude resignedly that all you require to run a risk of sexual harassment these days is two employees (actually, not even that if you have particularly frisky clients and contractors), sources for inputs to your risk assessment suggested by the EHRC include (from paragraph 4.10):

- Power imbalances
- Job insecurity; for example, use of zero hours contracts, agency staff or contractors
- Lone working and night working
- Out of hours working
- The presence of alcohol
- Customer-facing duties
- Particular events that raise tensions locally or nationally
- Lack of diversity in the workforce, especially at a senior level
- Workers being placed on secondment
- Travel to different work locations
- Working from home
- Attendance at events outside of the usual working environment, for example, training, conferences or work-related social events
- Socialising outside work
- Social media contact between workers
- The workforce demographic; for example, the risk of sexual harassment may be higher in a predominantly male workforce*

The EHRC also suggests that there are certain factors that increase the risk of sexual harassment and makes clear that employers should consider these factors when thinking about how they can comply with the preventative duty. The factors include, but are not limited to (taken from paragraph 4.11 of the EHRC guidance, with our comments added where we consider helpful):

- A male-dominated workforce*
- A workplace culture that permits crude/sexist "banter" or other disrespectful behaviour
- Gendered power imbalances (for example, where most junior staff are female and most senior managers/leaders are male)*
- Workplaces that permit alcohol consumption
- An expectation that workers will attend social events/conferences outside of the workplace or stay away from home overnight (particularly if alcohol is being consumed)
- Lone or isolated working

- Working alone with a third-party [Author's comment – At the time that the Technical Guidance was issued, notwithstanding the inclusion of this factor, employers did not, in fact, have any statutory responsibility to take steps to prevent harassment by third parties, but this will change come 30 October. Remember, it will not only apply to sexual harassment, but also harassment related to other protected characteristics. While there are undoubtedly risks where individuals work alone with third parties (see also Step Seven in the Eight-step guide), we recommend you consider this more widely – e.g. look at any risks that might arise for your employees due to interactions of any kind with third parties (e.g. customers) rather than simply when staff are alone with them, and how to mitigate these.]
 - Night working
 - An insecure/casual workforce
 - A failure to respond appropriately to previous reports of sexual harassment [Author's comment – We would add to this, how have prior allegations of sexual harassment been (seen to be) handled? What lessons will have been taken from that by the other employees? Please refer also to Step Six of the Eight-step guide.]
 - Not having policies or procedures to prevent or respond to sexual harassment [Author's comment – The EHRC guidance also makes clear that risk assessments should consider working practices, including policies and procedures. We would add to this, when was the last time your sexual harassment or equal opportunities policy saw the light of day? While the EHRC lists "not having policies or procedures" as a factor likely to increase the risk of sexual harassment (fairly obviously), we suggest most of our clients and contacts will have these in place. The more pertinent question is when were these last reviewed/implemented/taken seriously?]
 - Workers who have more than one protected characteristic; for example, disabled people, ethnic minorities and people from the LGBTQ community are more likely to experience sexual harassment than people who do not have these protected characteristics
 - There may be risks that only affect one job role or worker, these should still be considered and addressed so far as practicable
- * These factors are extracted from the EHRC guidance and should be considered, but our advice is also to be wary of assuming that all sexual harassment is man-on-woman. That is, of itself, an overly simplistic approach to the question and potentially discriminatory.

To the risk factors set out by the EHRC, we would add the following:

- What level of direct physical management oversight applies?
- Do the last, say, 12 months' exit interviews have any story to tell about this? What about Glassdoor or internal opinion surveys?
- What is your corporate history of such conduct?
- What training have you done? How long ago? Was it any good?
- Does this sort of conduct feature in your onboarding or induction processes for new hires?
- When did the board last pay any express attention to this question other than under duress? Is it seen to be interested in promoting the right behaviours or merely those that do not inconvenience the business?
- What is the physical distribution of your workforce? Are some of them sited in dark corners, where uninvited attention may be harder to spot, or do they work alone and without the deterrence of potential witnesses?
- Has there been any material number of complaints or grievances about bullying or other unattractive behaviours that could very easily be or have been related to a protected characteristic?

- Do you have a route for raising allegations about harassment that is (a) known to employees; (b) seen as safe, i.e. does not lead to retaliation or victim blaming, and (c) confidential? The EHRC guidance makes it clear that employers should ensure that staff are aware of reporting mechanisms, and that management know what to do if a staff member raises a complaint of harassment. Alternatively, do you see grounds to conclude that conduct of this sort may go or have gone unreported, whether out of fear, ignorance or concern that the company may under-/over-react to those allegations? See also Step Four of the Eight-step guide for more information on the EHRC's expectations in this regard.

Obviously, this assessment is not mechanical and does not generate a numerical score above or below a particular risk threshold. It may lead you to conclude that your risk is relatively low, but be aware, no Employment Tribunal will ever accept an argument that there was no risk at all. You will always need to do something. The obvious next question is what that should be. The EHRC guidance recommends that employers should produce an action plan that sets out what preventative steps they will take to address any identified risks and how that will be monitored. Remember, when the duty changes in October 2026, the duty will be to take "all reasonable steps", and so it will become very difficult for an employer to justify not taking a potential step unless there is a very good reason as to why it would not be reasonable. Employers should consider publishing their action plan to workers and the public, for example, on their website, and updating it from time to time.

Employers are also advised to consider appointing a designated lead to take responsibility for implementation of the action plan and compliance with the preventative duty.

Again, have a look at the EHRC guidance and Eight-step guide, but once you have your risk assessment in place, we recommend something like steps B to E below.



B. Training

Without some visible training of your staff, there is next to no chance of your being found to have complied with the new statutory duties. But what training, to whom, when and how, etc.? This is covered in Step Five of the Eight-step guide. Other things we recommend thinking about when reviewing what has been done, and what needs to be done in this respect might include:

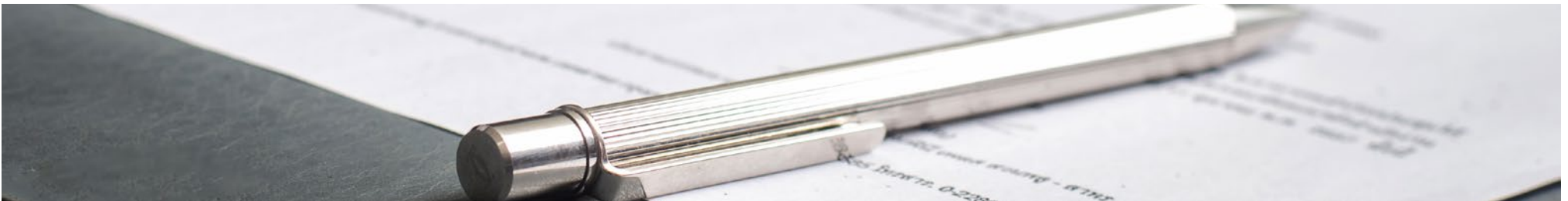
- 1. When did you last do it?** There is no hard-and-fast rule here, but the implication from decided case law is that anything much less than annually is taking you into some pretty choppy waters.
- 2. Relatedly, what has been your staff turnover or growth over that time?** In other words, has a material proportion of your workforce not actually done the training at all?
- 3. What form did it take** – a rushed half-hour on top of other duties, or a dedicated slot of an hour or so without avoidable interruption? That sort of time is enough to convey all the legal, practical and behavioural principles required, and much more than that risks becoming counterproductive. We saw a piece in the New York Times some years ago that suggested that equal opportunities training is most effective if it lasts for four hours or more, but we do not recommend that as there will be no positive and empowering message left after that, and potentially no survivors at all.
- 4. How can you make sure that senior management is seen to attend the training, and not duck out for “urgent calls” and “client meetings”?** In fact, the emphasis should not just be on their attending, but on their being seen to actively drive and support these principles. Get them to stand up and introduce it at the beginning. Doing the training “in person” is probably the most effective way to manage this, ensuring that individuals are not on their phones at the same time. If the training is done online, consider making it compulsory that cameras are left on. It is also possible to engage software which detects when anyone navigates away from the training e.g. to check their email inbox, to avoid attendees being able to carry on with other work whilst they ought to be attending the training.
- 5. Is your training comprehensive?** A full rehearsal of the law and practice around harassment is the stuff of a three-day residential course, and there is absolutely no requirement for that. However, you do at least need to cover the basics – the components of harassment, what will constitute victimisation, the potential for personal liability, why it does not matter that you did not mean to offend, your view of what should be upsetting not being relevant, why “bantz” is neither an excuse nor a word and maybe a little on just how grim it is to be publicly grilled in the Employment Tribunal by a professional assassin.
- 6. Is your training accurate?** Is it up to date with law and good practice, and not misleading as to any requirement of intention or sexual intent? Does it wrongly blur the line between harassment and bullying, or suggest the need for some continuing course of conduct or for the victim to have made their disquiet obvious first?
- 7. Who did your training?** Both in terms of whether no-shows were hunted down and made to attend a session, and whether the person doing the training had the knowledge, presentation skills and gravitas to deliver the necessary messages effectively, getting in someone external at a cost is a visible sign of your company’s willingness to invest in getting this right. Such a person may hold audience attention for longer than someone internal who necessarily comes to that session with their own perceived history or agenda and may be less persuasive as a result. Invest wisely here – a poor external presenter will blight not just their particular hour but also the wider message. You can always find a cheaper speaker, but in this arena, you very much get what you pay for.
- 8. What evidence have you got of all this?** Is there a register, a slide-pack, a handout, etc.?
- 9. Did it work?** Have there been new allegations of sexual harassment since the training? Do they indicate a collective failure to take the necessary messages on board, or only that one or two specific individuals have proven totally impervious to these new ideas? Given that the duty is ongoing, as time passes, you will need to factor the success or otherwise of the training into your risk assessment.
- 10. Should you have training tailored to different groups within your workforce to address the different risks that they pose?** For example, some training for lower-level staff, some for managers who may receive complaints and some for more senior staff who may be required to deal with and rule upon them and to decide on appropriate consequences.
- 11. Should any of the training adopt a more holistic approach and look also (not instead) at related skills that could reduce workplace disputes and hence the scope for employees to feel bullied or harassed – conflict management, “difficult conversations” or formal mediation skills, for example?**
- 12. Does your training give some guidance on what to do and where to go if you are not a victim of harassment, but believe yourself to be a witness or bystander to it?**



C. Policies/contracts

Another fundamental plank of compliance here will be written rules; the evidence that your staff knew or should have known the appropriate behavioural boundaries. Refer also to Step One of the Eight-step guide for details of what the EHRC expects any such policies to include. Substance is very definitely more important than form here, so it is not madly important whether these appear in contracts or noncontractual guidance or policies. When the glare of the Employment Tribunal's scrutiny falls on your anti-harassment paperwork, is it going to shine? Consider:

- 1. When was it last reviewed?** Even if the review concludes that no update to your policy is necessary, being able to show that you look at it at least once a year will be a positive step. Maybe, if not the case already, you could expressly make review of the policy an internal audit item?
- 2. Where has your policy been since then?** Front and centre on the notice board or intranet, or just turning slowly to peat in the drawer in HR where policies go to die? If a member of your staff wanted to see it, how readily could they find it (and in particular, the piece around reporting harassment allegations)?
- 3. Like the training, is your policy around harassment legally accurate and practically workable?** What commitments does it make to either accuser or accused around process or sanction? Are these realistic, or is some additional expectation-management wording required? You need to be careful about waving around superficially impressive references to zero tolerance and summary dismissal of harassers. They will create expectations among victims that there may be good reasons not to satisfy in particular cases. Keep in mind that if you depart from a harassment policy in any respect, the burden will be on the business to explain why and how that is not instantly a further instance of less favourable treatment or retaliation, or not taking the allegation as seriously as you said you would. It is not being disrespectful of harassment victims or the message of this new law to indicate that the appropriate response to complaints of this sort must depend on the facts of each case.
- 4. Is reference to your anti-harassment policy included in your employee induction materials, and do you expressly impose similar standards on external suppliers, agency temps and other contractors?** Even on clients, who may regard themselves as above all this by reason of the business they bring to your company, could you put something clear but non-provocative in your terms of business, for example? After all, the principle of not harassing your supplier's staff should hopefully be fairly uncontroversial, and both clients and suppliers are increasingly used to the contractual pull-through of terms of this sort because of existing law around tax evasion and modern slavery measures. Or, if you have premises where third parties may be present, at the very least you should display signage making it clear that you will not accept harassment of your staff. Remember, the duty is to take "all" reasonable steps, and it is hard to see how you might justify not putting up a sign.
- 5. What does it say in your contract of employment?** Don't harass, obviously, but what happens if you do? This should include express mention of dismissal as a possible sanction for deliberate sexual harassment or victimisation, but should not say that even deliberate harassers will necessarily or automatically be dismissed, since that would be predetermination and so would largely scupper your ability to defend any subsequent unfair dismissal claim.
- 6. Remember to update your whistleblowing policy.** Employers should review any existing whistleblowing policies and procedures and ensure any definition of whistleblowing is updated to reflect the provision which changed in April i.e. that to provide a report that sexual harassment has occurred, is occurring or is likely to occur, will amount to a protected disclosure for whistleblowing purposes. Managers should also be made aware of this new protection.



D. Workplace culture

How employees feel about their employer generally is not a reliable indicator of the risk of sexual harassment – there may be all sorts of other personal agendas and resentments also at play. However, if they have reason to doubt your good faith and commitment to the very worthy objectives of this specific change in the law, you will wish to address this, which may involve having a long hard look at your culture more generally. This is in part to comply, but also to give them no reason to allege that you haven't. Step Two of the Eight-step guide focuses on employee engagement, suggesting that employers should conduct regular one-to-ones, run staff surveys and exit interviews, and have open door policies.

By definition, steps to prevent harassment are only effective until they are not, so almost any assessment of whether you have taken all reasonable steps will be conducted with the benefit of hindsight, and in the context of an allegation that they did not work. All employers will therefore effectively go into that particular debate a goal down already, so you will not want to undermine all your company's good work on this by careless management treatment of such allegations as do arise. In particular:

- 1. Have you acted in broad accordance with any relevant policy/contract?** You can threaten all the hellfire and brimstone you want, but if, in reality, harassers are known to have been given no more than a gentle ribbing in the bar, the document has already had the wind taken from its sails and will need a relaunch.
- 2. What happens to those who make allegations?** Similarly, any number of references in your policy to good faith allegations of harassment being protected against retaliation will look pretty hollow if all those who complain seem to leave shortly thereafter. That is not to say that, in individual cases, a parting may not be the best solution for both employer and employee, but you will wish to reassure yourself that the arrangement was genuinely voluntary on the part of the employee and that even then, it was not their reasonable fear of further unlawful conduct by other employees that led to that decision. Remember that as of April 2026, those who make allegations are also afforded whistleblower protection.
- 3. Do your relevant line managers know to greet a sexual harassment allegation with empathy, concern, urgency and confidentiality?** Is there a risk that they will (even with good intent) try to make light of an issue, dismiss it as "just the way it is" or seek to persuade the complainant, for notionally the best possible reasons, not to make anything of it? Worse, will they try to fix it themselves? Step Six of the Eight-step guide suggests further steps employers ought to take when a complaint of harassment is made, and importantly emphasises its view that employers should only use confidentiality agreements (also known as confidentiality clauses, non-disclosure agreements (NDAs) or gagging clauses) where it is lawful, necessary and appropriate to do so. Employers are directed to the [EHRC's guidance on the use of confidentiality agreements in discrimination cases](#) for further information. The government has also announced that it intends to introduce new statutory restrictions on the ability of employers to preclude workers from making allegations or disclosures about work-related harassment or discrimination, so as and when more detail is provided about this (likely to be at some stage in 2027), employers will need to ensure that they comply with these limitations too. But keep in mind that such agreements are often at least as much in the victim's best interests as the harasser's, so consider their wishes in the matter too.



E. Next steps

None of this is very difficult. None of it requires particularly granular or forensic examination, or the production of detailed statistics or empirical research into the psychology of harassment, etc. Equally, none of it requires a new brutalist approach to preventing harassment that will inevitably alienate 99% of your workforce for the notional purpose of having some positive impact on the 1%. None of it entails either any different interpretation of when harassment takes place, or any new approach to how grievances about it are investigated or what sanctions may be appropriate.

What this change in law does require is recorded dedication of time, thought and ideally money to the question of whether there are things here you could relatively easily start doing, or do again or do better, that may reduce the risk of harassment in your workplace. The key word here is “may” – there is no requirement that a reasonable step can only be one that is guaranteed to make a difference, or that it would make a difference if certain of your staff were not such utter clowns. So, that means:

1. Having reviewed the questions above and the EHRC guidance, think about generating an action plan that puts the big visible easy stuff first (training in particular).
2. Get some quotations from reputable external advisers for any external input you may require, in particular around preparing the risk assessments, training and revamping policies or conducting staff surveys.
3. Make a case for action to the relevant ExCo or Board, coupled with an explanation of the change in law and appropriately tactful reminders that a corporate failure in this respect can cause harm not just to the business but also to them as individuals. You can particularly highlight this point if you operate in the financial services sector and are staring down the barrel of the new Financial Conduct Authority (FCA) guidance on non-financial misconduct.
4. Even if you do not manage to do all of this by 30 October, try to do at least something of it sooner rather than later, which will be a visible sign to your staff and other stakeholders that you have the new duty very much in mind.
5. Remember that the duty is ongoing, so Step Eight of the Eight-step guide emphasises the importance of regularly evaluating the effectiveness of the steps you put in place to prevent sexual harassment in your workplace, and of implementing any changes arising from that.

F. How we can help

We are currently working with many of our clients on compliance with the new all reasonable steps duty (including the duty to take all reasonable steps to prevent harassment by third parties), including by helping them work through the risk assessment process, reviewing policies/procedures and designing and running training programmes, all essential elements of complying with the new duty. If you would be interested in talking to us about ways in which we might be able to support you and your business with your preparation or if you have any questions about anything in this note, please get in touch with your usual contact.



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