



The Harassment Duty: Are You Taking All Reasonable Steps?

A practical self-check for UK employers under the Employment Rights Act 2025

What changes on 30 October 2026

The duty gets stronger	Since October 2024 employers have had to take <i>reasonable steps</i> to prevent sexual harassment. From 30 October 2026 that becomes all reasonable steps . Doing some of the obvious things is no longer enough.
Third-party harassment	Employers become liable when staff are harassed by customers, clients, contractors, suppliers or the public, unless all reasonable steps were taken to prevent it. This covers every protected characteristic , not just sexual harassment.
Already in force	Tribunals can uplift compensation by up to 25% for breach of the sexual harassment duty. Reports of sexual harassment are protected whistleblowing disclosures (from 6 April 2026), and the tribunal claim time limit is now six months (from 1 October 2026).

Tick each item you can evidence today. Anything unticked is a gap a tribunal could point to.

01 Policy

- ☐ You have a written anti-harassment policy that names sexual harassment specifically.
- ☐ The policy covers harassment by third parties (customers, clients, contractors, the public).
- ☐ It covers work events, travel, remote working and online communication, not just the workplace.
- ☐ Every employee has received it and you have a record that they acknowledged it.
- ☐ It has been reviewed in the last 12 months and updated for the October 2026 changes.

02 Risk assessment

- ☐ You have a written harassment risk assessment for your business.
- ☐ It identifies higher-risk settings: client-facing roles, lone or late working, alcohol, events, power imbalances.
- ☐ Third-party risk is assessed for each role or team that deals with the public or clients.
- ☐ Each risk has a control measure, an owner and a review date.

03 Training

- ☐ All staff have had harassment training, including what to do about third-party behaviour.
- ☐ Managers have had separate training on receiving and handling complaints.
- ☐ Training records are kept, and refresher training is scheduled.

04 Reporting

- ☐ Staff have more than one way to report, including a route that bypasses their line manager.
- ☐ Staff know how to report harassment by a customer, client or contractor.
- ☐ Managers know they must escalate a report even if the employee asks them not to act.

05 Handling complaints

- ☐ Complaints are acted on promptly and investigated by someone impartial.
- ☐ The person raising the complaint is offered support and protected from victimisation.
- ☐ Outcomes, actions taken and lessons learned are recorded.

06 Third parties

- ☐ Customer-facing areas, booking terms or websites state that harassment of staff will not be tolerated.
- ☐ Contracts with suppliers, contractors and clients include a conduct clause.
- ☐ Staff are empowered to end an interaction, and there is a process to refuse service or remove someone.

07 Records and review

- ☐ You keep a log of the steps you have taken, with dates. This is your evidence.
- ☐ Reports and trends are reviewed at least annually and the risk assessment updated.

FOUND GAPS?

Get our Anti-Harassment Policy template, updated for 30 October 2026.

Covers sexual harassment, third-party harassment and reporting routes. Download it at tridenthr.co.uk, or book a free introductory call and we will walk through your checklist with you.