

1 in 5 UK Managers Have No Training on Sexual Harassment, Despite Being the First People Employees Turn To

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UK businesses have fewer than three months to prepare for their expanded legal duty to prevent sexual harassment at work, but many lack the basic steps. New data from compliance eLearning provider [VinciWorks](#), which polled 985 UK-based HR and compliance professionals in July 2026, suggests that many still can't demonstrate they've put in place the required reasonable steps.

From 1 October 2026, the Employment Rights Act raises the bar from “reasonable steps” to “all reasonable steps”. This is a significant change that requires many organisations to take more action than they ever have to prevent sexual harassment. Under the current standard, an employer can point to some effort and argue it was reasonable. Under the new standard, the burden falls on employers to explain anything left undone.

Managers are the least prepared group, despite being the first point of contact

Managers are typically the first point of contact an employee reports to when something happens, yet only 30% of businesses provide them with dedicated training on how to respond. Almost a third (32%) fold manager training into general staff sessions, and a fifth (21%) provide no specific manager training at all.

That one-in-five figure is where significant risks exist for many organisations. A manager handling a sexual harassment report in the wrong way can turn a manageable situation into a mishandled one, potentially triggering a whistleblowing breach as well since sexual harassment became a protected disclosure in April 2026.

Nick Henderson-Mayo, Head of Compliance at VinciWorks, said: “The first hour after someone discloses harassment to a manager is where trust is built or lost. If that manager is not equipped for the moment, then neither is the business standing behind them. A lack of proper, role-specific training is one of the clearest risks.”

That gap starts further back. Over half of employers haven’t reviewed their own risk in the past year.

A third of employers have no evidence to show a tribunal

Asked when they last conducted a sexual harassment risk assessment, a third (34%) said they never have, and a further 17% said it had been more than a year ago. That means over half of employers are either overdue a review or have never carried one out at all.

A risk assessment is one of the clearest forms of evidence an employer can produce. It shows a tribunal that the business actively looked for where harassment could occur, rather than waiting for a complaint to force the issue. Without one, an employer is left arguing its good intentions rather than pointing to a documented process, a much weaker position once the “all reasonable steps” standard applies.

Ruth Mittelman-Cohen, Head of Legal Compliance at VinciWorks, said: “A risk assessment is the evidence that an employer looked at where harassment could happen in their business and did something about it. Without one, there’s no paper trail, and no paper trail is very hard to defend in front of a tribunal.”

Manager training doesn’t happen in isolation; it sits on top of a wider training problem.

Training gaps leave one in seven businesses with no defence at all (14%)

The stats on training expose an even starker problem. Nearly half (47%) described their training as needing improvement, while 14% admitted they provide no sexual harassment training whatsoever. Only seven per cent rated their training as excellent.

That 14% is the figure that should concern employers most. Under the current duty, and more so under the tougher standard from October, training is one of the primary ways a business demonstrates it took the issue seriously. An employer with no training in place has effectively no evidence to offer if a claim ever reaches a tribunal, leaving it exposed not just to the harassment claim itself but to a finding that it failed the statutory duty to prevent it.

Four in ten employers can’t show they’re addressing harassment proactively

Bystander intervention training, which teaches staff how to safely challenge or report harassment they witness rather than experience directly, remains rare. Just 12% have embedded it into ongoing yearly training, while two-fifths (41%) either have no plans to introduce it or are unsure whether they do.

This connects directly to the shift in what “reasonable steps” is expected to look like. A policy and a training module cover the basics, but bystander intervention training is increasingly viewed as evidence that a business is building a culture where harassment is challenged by everyone, not just handled reactively by HR once a complaint is made. Businesses without it are relying on employees to report harassment themselves, which is precisely the passive, complaint-led approach the new duty is designed to move away from.

Lorna Gemmell, employment law and HR training manager at [WorkNest](#) said, “Employers can’t afford to treat this as a tick-box exercise. The duty is about taking ‘all reasonable steps’ to prevent sexual harassment before it happens, and that means being able to demonstrate meaningful action, not just having a policy sitting on the intranet.

“The findings suggest that too many organisations are still relying on good intentions rather than proactive measures. If employers haven’t reviewed the risks in their workplace, trained their people and kept those measures under regular review, they may find it difficult to show they have met their legal obligations.”

With the deadline weeks away, only 8% of businesses report making significant changes ahead of the new duty, while less than half (45%) have made none at all, leaving most of these gaps still open.

Three things employers should do before 1 October

- Carry out a sexual harassment risk assessment if you haven’t already, focusing on where your business is genuinely exposed: lone workers, client-facing roles, night shifts, and any third-party contact.
- Give managers dedicated training on responding to a disclosure, separate from general staff-wide awareness training.
- Make sure more than one reporting route exists, so nobody has to raise a concern with the person closest to the problem.