



OTAS Insight

WF-001

Operational ●

Tactical ●

Strategic ●

Correct as of 20 October 2026

Preventing harassment of crew by the public: the full report

The new third-party harassment duty and 'all reasonable steps' for event operations in Great Britain, in force from 30 October 2026

Code	WF-001
Format	OTAS Insight full report
Levels	All levels: Operational, Tactical and Strategic
Applies to	Great Britain (England, Scotland and Wales). Not Northern Ireland
Correct as of	20 October 2026
Version	1.2, Public
Published by	OTAS Insights Event Professionals Global News

Not legal advice

This report is general information, not legal advice. It does not replace your own legal advice, risk assessments, policies or contracts. It sets out the law in England, Scotland and Wales as at 20 October 2026. It is not endorsed by the EHRC, Acas or the UK Government.

Document control

Item	Detail
Title	Preventing harassment of crew by the public: the full report
Code and version	WF-001, version 1.2
Classification	Public
Correct as of	20 October 2026
Review	When the EHRC publishes its updated technical guidance, when regulations under section 40B are made, or after the first appeal decisions on the new rule, and no later than 30 April 2027
Companion article	OTAS Insight WF-001, the article version for OTAS Insights
Change log	1.0: first issue (20 October 2026). 1.1: legal review changes (20 October 2026): EHRC enforcement wording and source, 26 October 2024 timeline entry, small-company answer, note on names. 1.2: house style (20 October 2026): punctuation only, no change to legal content

How to use this report

Read section 1 for the summary and the first 5 things to do. Section 3 sets out the law with the statute text. Sections 5 to 7 are practical: steps by level, risk scenarios and tools you can copy. Each practical part is tagged Operational, Tactical or Strategic.

Contents

1	Executive summary	3
2	Scope and method	4
3	The law in full	4
4	Why event operations is exposed	10
5	All reasonable steps in event operations	11
6	Risk scenarios by area	13
7	Tools	16
8	Frequently asked questions	19
9	What we don't know yet	21
10	Sources	22
11	Disclaimer and about this report	24

1 Executive summary

From 30 October 2026, an employer in Great Britain can be liable when a third party harasses one of its employees at work. A third party is anyone other than the employer or its own employees: audience members, guests, client staff, artists and their teams, suppliers and other contractors [1][2]. The same day, the duty to prevent sexual harassment of employees becomes a duty to take 'all reasonable steps', not just 'reasonable steps' [3][4].

Event operations is exposed. Crew work face to face with the public, often late, around alcohol and crowds, on short engagements and at sites the employer does not control. Official guidance lists most of those conditions as risk factors [5][6]. A tribunal is likely to ask what an employer in that setting should have foreseen, and what it did about it.

The defence is prevention. An employer does not break the new rule simply because a member of the public behaved badly. It breaks the rule if the harassment happened in the course of the employee's work and the employer failed to take all reasonable steps to prevent it [1]. Guidance from the Equality and Human Rights Commission (EHRC) says an employer has taken all reasonable steps when "there are no further steps that they could reasonably have been expected to take" [5].

What this report gives you

- The law in full, with the statute text, the commencement order and the official guidance, for England, Scotland and Wales. Scotland's differences are set out in section 3.11.
- What 'all reasonable steps' can look like in event operations, set out by Operational, Tactical and Strategic level (section 5).
- Risk scenarios across ingress and egress, bars, front of house, stewarding, artist liaison, hospitality and accommodation (section 6).
- Ready-to-use tools: an action checklist, a briefing script, a reporting and log template and contract points to raise with clients and venues (section 7).
- Answers to common questions, and a frank list of what nobody knows yet (sections 8 and 9).

The 5 things to do first

1. Name one senior person accountable for harassment prevention, and put the subject on the leadership agenda.
2. Add harassment by the public to the event risk assessment for each show or site, and record the controls you choose and the ones you rule out.
3. Brief every shift on what behaviour is not acceptable and exactly how to report it, using a route that works on site.
4. Log every report in the event control log, act on it and review the reports in the debrief.
5. Raise the contract points in section 7.4 with clients and venues before the next booking is confirmed.

A note on names

The Worker Protection (Amendment of Equality Act 2010) Act 2023 inserted section 40A, the duty to take 'reasonable steps' to prevent sexual harassment, in force from 26 October 2024 [4][7]. The Employment Rights Act 2025 builds on it. The move to "all reasonable steps" comes from section 20, the third-party rule from section 21, and the power to set out reasonable steps in regulations from section 22 [2][3][8]. All 3 sections come into force in Great Britain on 30 October 2026 [2].

2 Scope and method

2.1 What this report covers

This report covers the duties that an employer owes to its own employees under the Equality Act 2010, as amended, where the harassment comes from someone outside the organisation. It covers England, Scotland and Wales. Northern Ireland has its own equality law and is outside the scope of this report.

It is written for event professionals who employ or engage crew: event and production companies, crewing and staffing suppliers, security and stewarding contractors, bar and hospitality operators and venues that run their own events. Each part is tagged to a level. Operational means crew on the ground. Tactical means event, site and crew managers and supervisors. Strategic means owners, directors and senior managers.

2.2 How we checked it

We read every provision at legislation.gov.uk, the official home of UK legislation, on 20 October 2026. We read the guidance on the publishers' own websites the same day: the EHRC, Acas, GOV.UK, business.gov.uk, the Health and Safety Executive (HSE) and the Information Commissioner's Office (ICO). Every source is listed in section 10 with its address.

Where we quote the law, the wording is exact. Where legislation introduces a list with a dash, we show a colon and start each item on a new line. Quotation marks inside a quotation are shown as single quotes. The words are unchanged. Where we give a view on what the law means for event operations, we say so. Where a point is not settled, it appears in section 9.

2.3 What this report is not

It is not legal advice, and it does not replace your own risk assessments, policies or contracts. It is not endorsed by the EHRC, Acas or the government. The examples are illustrations written for this report. They do not describe real events, people or organisations.

How we use 'must'

We write 'must' only where the law sets a duty, and we give the source. Where we write 'we recommend', 'consider' or 'can', that is OTAS method or good practice, not a legal requirement.

3 The law in full

3.1 How we got here

Date	What happened	Source
2008 to 2013	The Equality Act and the law before it held employers liable for third-party harassment in limited cases. The employer had to know of 2 earlier incidents, the so-called 'three strikes' rule.	[9][5]
1 October 2013	Section 40(2) to (4) of the Equality Act 2010, the third-party provisions, were omitted from the Act.	[10]
2018	In <i>Unite the Union v Nailard</i> [2018] EWCA Civ 1203, the Court of Appeal held that the Act no longer made employers liable for failing to protect workers from third-party harassment. The exception was where the failure was itself related to a protected characteristic.	[5][9]

Date	What happened	Source
26 October 2024	Section 40A in force: employers must take reasonable steps to prevent sexual harassment of their employees in the course of their employment. The EHRC says this includes harassment by third parties [5].	[4][7]
18 December 2025	The Employment Rights Act 2025 received Royal Assent.	[11]
6 April 2026	A disclosure that sexual harassment has occurred, is occurring or is likely to occur became a qualifying disclosure for whistleblowing protection.	[12]
1 October 2026	The time limit for most Equality Act claims in the employment tribunal became 6 months.	[13][14]
30 October 2026	Sections 20, 21 and 22 of the Employment Rights Act 2025 come into force: 'all reasonable steps', the third-party harassment rule and a power to set out 'reasonable steps' in regulations.	[2]
2027/28	The government expects regulations defining 'reasonable steps', after consultation.	[9]

3.2 The commencement order

SI 2026/1065 was made on 1 October 2026. Regulation 3 lists the provisions of the Employment Rights Act 2025 that come into force on 30 October 2026. They include:

- "(a) section 20 (employers to take all reasonable steps to prevent sexual harassment);
 - (b) section 21 (harassment by third parties);
 - (c) section 22 (sexual harassment: power to make provision about 'reasonable steps');"
- SI 2026/1065, reg 3(a) to (c) [2]

The order contains no transitional provision for these 3 sections. We have not found any rule that applies the new third-party duty to conduct before 30 October 2026. Conduct before that date is judged under the law in force at the time.

3.3 The third-party harassment rule: section 40(1A) to (1C)

Section 21 of the Employment Rights Act 2025 inserts 3 new subsections into section 40 of the Equality Act 2010, after subsection (1):

- "(1A) An employer (A) must not permit a third party to harass a person (B) who is an employee of A.
- (1B) For the purposes of subsection (1A), A permits a third party to harass B only if:
 - (a) the third party harasses B in the course of B's employment by A, and
 - (b) A failed to take all reasonable steps to prevent the third party from doing so.
- (1C) In this section 'third party' means a person other than:
 - (a) A, or
 - (b) an employee of A."

Equality Act 2010, s.40(1A) to (1C), inserted by Employment Rights Act 2025, s.21 [1]

Read with section 40(1), which already says an employer must not harass its own employees or job applicants, this closes the gap left in 2013 [10]. The new rule protects employees. It does not mention job applicants.

3.4 'All reasonable steps': section 40A

Section 40A has applied since 26 October 2024. Subsection (1) said: "An employer (A) must take reasonable steps to prevent sexual harassment of employees of A in the course of their employment." [4]

From 30 October 2026, section 20 of the Employment Rights Act 2025 inserts "all" before "reasonable steps" [3].

Section 40A(2) says sexual harassment here means "harassment of the kind described in section 26(2) (unwanted conduct of a sexual nature)". Section 40A(3) says the duty is enforceable only by the EHRC, or by an employment tribunal through the compensation uplift in section 124A [4]. An employee cannot bring a claim for a breach of section 40A on its own [4][5].

The 'all reasonable steps' wording matches the employer's defence in section 109(4). That defence has long applied where an employer is sued over harassment by its own staff [15]. The EHRC explains the test this way: an employer has taken all reasonable steps "if there are no further steps that they could reasonably have been expected to take" [5].

3.5 Regulations on 'reasonable steps': section 40B

Section 22 of the Employment Rights Act 2025 inserts section 40B. It gives ministers a power to set out in regulations which steps count as 'reasonable' for sexual harassment [8]. Section 40B(2) says the steps may include, among others:

- "(a) carrying out assessments of a specified description;
- (b) publishing plans or policies of a specified description;
- (c) steps relating to the reporting of sexual harassment;
- (d) steps relating to the handling of complaints."

Equality Act 2010, s.40B(2), inserted by Employment Rights Act 2025, s.22 [8]

The regulations will follow the affirmative procedure, so both Houses of Parliament have to approve them [8]. No regulations have been made. The government expects them in 2027/28, after consultation [9]. Until then, what counts as reasonable depends on the facts of each case.

3.6 What the elements mean

Harassment

Section 26 of the Equality Act defines 3 kinds of harassment [16]:

- Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating a person's dignity or creating "an intimidating, hostile, degrading, humiliating or offensive environment" for them (s.26(1)).
- Unwanted conduct of a sexual nature with that purpose or effect (s.26(2)).
- Less favourable treatment because a person rejected or submitted to sexual conduct, or conduct related to sex or gender reassignment (s.26(3)).

The relevant protected characteristics are "age; disability; gender reassignment; race; religion or belief; sex; sexual orientation" (s.26(5)) [16]. Pregnancy and maternity, and marriage and civil partnership, are not covered by the harassment provisions [5][17]. Acas gives plain-English examples of sexual harassment on its website [18].

The effect test

In deciding whether conduct had the effect, a tribunal must take account of 3 things (s.26(4)) [16]. They are "the perception of B", "the other circumstances of the case" and "whether it is reasonable for the conduct to have that effect". Government guidance says "Conduct that is trivial or causes minor offence will not be sufficiently serious to meet the definition of harassment." [9]

In the course of employment

The EHRC says 'in the course of employment' has a wide meaning. It includes any place where the worker is working, such as offsite or at a conference. It can include work-connected events where the worker is not actually working [5]. For event operations, we read this as covering the site, travel between sites and crew accommodation or hospitality arranged by the employer. That is our view; no tribunal has yet ruled on it under the new rule.

Who counts as a third party

Anyone other than the employer and its own employees [1]. Acas lists customers, clients, service users, self-employed consultants, contractors, tradespeople, "people at conferences or events" and other members of the public. It adds that a third party "could harass someone online or in-person" [19].

No 'three strikes'

The new rule does not require earlier incidents, or that the employer knew about the person beforehand. Those conditions were part of the rule repealed in 2013 [9]. The question is whether the employer took all reasonable steps.

3.7 Who is protected

The duties protect 'employees' in the Equality Act sense. Section 83(2)(a) defines employment as "employment under a contract of employment, a contract of apprenticeship or a contract personally to do work" [20]. That is wider than employment status for unfair dismissal. It takes in many casual crew who must do the work themselves.

Freelancers

Whether a self-employed freelancer is protected depends on the facts. The EHRC lists indicators that a person is an employee or worker. They include an obligation to do the work personally, the employer's control over how it is done and integration into the employer's workforce [5]. A contract that says 'self-employed' does not settle the question. A freelancer with a real right to send a substitute is less likely to be covered. We recommend taking advice on any crew group where status is unclear.

Volunteers

The EHRC says volunteers are not protected under the work provisions of the Act, but may be protected under the services provisions. It notes "This has not yet been tested in the courts." [5] We recommend applying the same protections to volunteer stewards and crew as a matter of good practice.

3.8 Supplied crew

The new duties sit with the employer. If you supply stewards or bar staff to a client, your organisation is likely to be the one that must take the steps. That applies even though the client or venue controls the site.

The Equality Act also has a separate rule for contract workers. Section 41(2) says "A principal must not, in relation to contract work, harass a contract worker." [21] A principal is the person who makes work available for someone employed and supplied by another. Whether the new third-party rule in section 40 also reaches the principal, the client, is not clear. We list it in section 9. In practice, both parties control part of the risk, so the contract between them matters (section 7.4).

3.9 Enforcement, remedies and time limits

Claims in the employment tribunal

An employee can bring a claim in the employment tribunal for a breach of section 40, including the new third-party rule ^[22]^[1]. From 1 October 2026, the time limit is 6 months starting with the date of the act complained of, or such other period as the tribunal thinks just and equitable ^[13]. The 6-month limit does not apply where the relevant date is before 1 October 2026 ^[14]. Before most claims, the claimant has to contact Acas for early conciliation ^[23].

The compensation uplift

Where a tribunal finds a contravention of section 40 that "involved, to any extent" sexual harassment, and orders compensation, it must consider whether the employer also breached section 40A(1). If so, it may add up to 25% to the compensation ^[24]. Whether this uplift applies where the harasser was a third party has not been decided. Section 124A refers to section 40 as a whole, which now includes the third-party rule. We list the point in section 9.

The EHRC

The EHRC can enforce section 40A under Part 1 of the Equality Act 2006, which applies its enforcement powers to a breach of section 40A(1) ^[4]^[25]. Its powers include investigations, unlawful act notices, agreements and injunctions ^[5]^[25]. The EHRC says its powers under the duty do not depend on an incident of sexual harassment having taken place ^[5].

Appeals

Appeals go to the Employment Appeal Tribunal, and from there to the Court of Appeal in England and Wales or the Court of Session in Scotland ^[26].

3.10 Linked duties

Victimisation

It is unlawful to subject someone to a detriment because they complained of harassment, helped someone else to complain or are believed to be about to do so ^[27]. A crew member who reports a guest must not lose shifts for it.

Whistleblowing

Since 6 April 2026, a disclosure "that sexual harassment has occurred, is occurring or is likely to occur" can be a qualifying disclosure under the Employment Rights Act 1996 ^[12].

Health and safety law

The Health and Safety at Work etc. Act 1974 places a general duty on employers to protect the health, safety and welfare at work of their employees, so far as is reasonably practicable ^[28]. Regulation 3 of the Management of Health and Safety at Work Regulations 1999 requires a suitable and sufficient risk assessment ^[29]. The HSE has guidance on violence and aggression at work ^[30]. It defines work-related violence as "any incident in which a person is abused, threatened or assaulted in circumstances relating to their work" ^[31]. The EHRC notes that these duties may apply to third-party violence, including verbal abuse ^[5]. In our view, much harassment by the public is also a health and safety risk, so one risk assessment can cover both.

Personal liability

An employee who harasses a colleague in the course of employment can be personally liable under section 110 ^[32]. That section is about employees and agents, not third parties. A member of the public who harasses crew may commit a criminal offence or civil wrong, but those rules sit outside the Equality Act (section 3.11).

Free expression

The government's factsheet says the measure does not change how Article 10 of the European Convention on Human Rights applies. It adds that "any interference with the right to freedom of expression should be necessary and proportionate" [9]. It also says employers will not be expected "to foresee the wholly unforeseeable or police all customers' private conversations" [9]. For performance content, see section 9.

3.11 England, Scotland and Wales

The Equality Act 2010, the Employment Rights Act 2025 provisions and SI 2026/1065 extend to England, Wales and Scotland [10][1][2]. The employment tribunal system covers all 3 nations. The EHRC guidance, Acas guidance and business.gov.uk guidance apply in all 3 [5][19][17]. We found no difference for Wales in these provisions; Wales follows the England and Wales position in the table. The main differences for Scotland sit in the surrounding law:

Topic	England and Wales	Scotland
Appeals beyond the Employment Appeal Tribunal	Court of Appeal [26]	Court of Session [26]
Civil and criminal harassment by an individual	Protection from Harassment Act 1997, s.1 [33]	Protection from Harassment Act 1997, s.8: a civil 'action of harassment', where a course of conduct needs conduct on at least 2 occasions [34]. Criminal Justice and Licensing (Scotland) Act 2010, s.38: threatening or abusive behaviour, which can be a single act [35]
Drunk customers on licensed premises	Licensing Act 2003, s.141 (selling alcohol to a person who is drunk) and s.143 (failure to leave) [36][37]	Licensing (Scotland) Act 2005, s.115 (disorderly conduct, including using "obscene or indecent language to the annoyance of any person" while drunk) and s.116 (refusal to leave) [38][39]
Tribunal time limits	6 months for Equality Act claims from 1 October 2026 [13]	The same. Separately, Acas says time limits for breach of contract claims in Scotland increase to 6 months on 9 November 2026 [11]

In Scotland, section 115(2) also makes it an offence for a responsible person to allow disorderly conduct on licensed premises. It has a defence of taking all reasonable precautions and exercising due diligence [38]. That licensing duty is separate from the Equality Act. Venue staff in Scotland may find the two overlap in practice.

3.12 Status of the guidance

Guidance	Status on 20 October 2026
EHRC, 'Sexual harassment and harassment at work: technical guidance'	Published 30 January 2020, last updated 26 September 2024. The page says the EHRC is working to update it for the 2026 changes. Paragraphs 3.22, 3.45 and 3.65 to 3.68, which say there is no standalone third-party claim, will be out of date from 30 October 2026 [5]
Acas, third party harassment	Updated 26 August 2026 for the new rule [19]
Acas, Employment Rights Act 2025	Updated 20 October 2026 [11]
business.gov.uk	Updated 17 September 2026 [17]
Government factsheets	Undated on the face of the document. They describe the policy and the expected timing of regulations [9]

None of this guidance is the law itself. Tribunals and courts decide what the law means. The EHRC technical guidance is not a statutory code of practice. The EHRC says it aims to give tribunals and courts clear guidance on the law [5].

4 Why event operations is exposed

4.1 What the guidance lists as risk factors

The EHRC lists factors that an employer's harassment risk assessment may include [5]. Many describe a normal day in event operations:

- job insecurity, for example zero hours contracts, agency staff or contractors
- lone working and night working, and out of hours working
- the presence of alcohol
- customer-facing duties
- particular events that raise tensions locally or nationally
- travel to different work locations
- attendance at events outside the usual working environment

For sexual harassment in particular, the EHRC adds workplaces that permit alcohol, lone or isolated working and an expectation that workers will stay away from home overnight [5]. Acas lists similar risk factors, including alcohol and overnight travel [6].

The government's factsheet says employers should "consider the nature of any contact with third parties, including the type of third party, frequency, and environment" [9]. In event operations, the contact is frequent and the third parties are many and varied. The environment also changes from site to site.

4.2 Features of event work that raise the risk

Feature	Why it matters	Where it shows up
Large numbers of the public, many drinking	More contact, lower inhibition, less chance to identify the person later	Bars, front of house, ingress and egress
Short engagements and mixed crews	Crew may not know the reporting route, the supervisor or each other	Every area, especially on build days and one-day events
Sites the employer does not control	The venue or client sets the rules for removing a guest or adding staff	Supplied crew, festivals, hired venues
Late finishes and travel	Crew are tired and may travel or wait alone	Egress, transport points, accommodation
Close contact with artists and VIPs	Power imbalance, pressure not to complain	Artist liaison, backstage, hospitality
Work-arranged social settings	Crew drinks, after-show events and hotels can count as 'in the course of employment'	Hospitality and accommodation

4.3 What the numbers say

We have not found a verified, published statistic on harassment of event crew by the public in Great Britain. We do not quote any sector figure.

The government factsheet cites the Crime Survey for England and Wales for the year ending March 2025. It looks at people aged 16 and over who said they had experienced sexual harassment in the last 12 months. Of those, 5.2% were harassed by "a client or member of the public contacted through work". The figure for non-sexual harassment was 6.2% [9]. We took these figures from the factsheet. We have not checked them at the Office for National Statistics source, so treat them as unverified here. They cover England and Wales only, and all sectors.

5 All reasonable steps in event operations

5.1 How to think about 'all reasonable steps'

The law does not list the steps. The EHRC describes 4 stages [5]:

1. Consider the risks of harassment in the course of employment.
2. Consider what steps could reduce those risks.
3. Consider which of those steps are reasonable for you to take.
4. Put those steps in place.

The EHRC says an employer "is unlikely to be able to comply with the preventative duty unless they carry out a risk assessment" [5]. Factors include the size and resources of the employer, the working environment, the sector, contact with third parties, how effective a step is likely to be and its time, cost and disruption [5]. A step can be reasonable even if it would not have prevented the particular incident [5].

Acas says taking all reasonable steps "means doing what is possible with the available resources". It suggests you "record why you have not taken steps you've decided are not reasonable" [19]. In event operations, that record matters. Tribunals will look at what you knew, what you considered and what you did.

The tables below set out steps by level. They are not a legal standard and not a complete list. What is reasonable for a large festival operator will differ from a small crewing company. Each table has a column for the evidence to keep, because a step you cannot show is hard to rely on.

5.2 Operational: crew on the ground

Operational

Crew are not responsible for the duty; the employer is. These steps help crew protect themselves and help the employer act.

Step	What it looks like	Evidence to keep
Know what is not acceptable	Harassment by a guest, a client's staff, an artist's team or another contractor is reportable. That covers sexual conduct and conduct related to age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.	Briefing sheet signed or acknowledged
Know the route	The named supervisor, the radio call sign or code word and the post-shift form	Briefing record
Step away, then report	Move away from the person if you can, and tell your supervisor or event control as soon as it is safe. You do not have to deal with it yourself. If anyone is in immediate danger, use the site emergency procedure and call the emergency services.	Log entry
Note the facts	Time, place, what happened, what the person looked like, any witnesses	Report form

Step	What it looks like	Evidence to keep
Do not physically intervene	Removing a guest is for trained security staff under the venue's policy	Briefing record
Ask for support	You can ask to move post, take a break or have someone with you at egress	Log entry, welfare note

5.3 Tactical: managers and supervisors Tactical ●

Step	What it looks like	Evidence to keep
Brief every shift	Add the 2 points: what behaviour is not acceptable, and exactly how to report it (section 7.2)	Briefing sheet with date, time and who attended
Set a reporting route that works on site	A named supervisor for each area, a radio call sign or code word, and a short form after the shift. More than one route, so crew can avoid reporting to someone involved [40]. A route that works without a radio, such as a text message, for crew who are deaf or who cannot speak freely	Route printed on the briefing sheet and crew passes
Train supervisors	How to listen, move a crew member, call security and record what happened. Training in de-escalation is one of the Acas suggestions [19]	Training record
Staff high-risk posts	Where the risk assessment shows it, pair crew at busy bars and late egress points. Keep sight lines to lone posts. Plan relief so no one is stuck at a post	Staffing plan, sign-in sheets
Use the event control log	Log each report with time, what was seen, what was decided and who was told (section 7.3)	Log
Act on each report	Move the crew member if needed. Ask security or the venue to speak to, warn or remove the person under venue policy. Tell the reporter what was done	Log, outcome note
Review after the event	Look at reports in the debrief, spot hot spots, change the plan for the next show	Debrief notes, updated plan
Protect the reporter	No loss of shifts or worse posts for reporting [27]	Rota records

5.4 Strategic: owners, directors and senior managers Strategic ●

Step	What it looks like	Evidence to keep
Name an owner	One senior person accountable for harassment prevention, reporting to leadership at least each season	Board or leadership minutes
Assess the risk	Add harassment by the public to the event risk assessment for each show or site. Cover late finishes, VIP and artist areas, lone working, queues and ejections. Record the controls chosen and those ruled out, with reasons [5][19][29]	Risk assessment, version and date

Step	What it looks like	Evidence to keep
Update the policy	Cover harassment by third parties and all the relevant protected characteristics. State that crew will be supported. Use the current EHRC technical guidance until the updated version is published, and check Acas guidance [5][19]	Policy with version and date, how it was shared
Tell the public and clients	Customer terms, ticket terms, signs or screens saying harassment of staff is not tolerated. The EHRC's theatre example uses emails to audiences and notices [5]. Acas suggests customer terms and posters [19]	Copies of terms, signs, emails
Write it into contracts	Agree with clients, venues and promoters who handles abusive guests, how reports are shared and when crew can be withdrawn from a post (section 7.4)	Signed contract or written agreement
Know your crew	List who is on each crew and on what basis: employee, worker, agency, freelancer or volunteer. Note any crew under 18, who may need extra supervision under your safeguarding policy	Crew list
Resource it	Budget for supervision, security cover at high-risk points, radios and welfare	Budget, staffing plan
Check it works	Review the log across events. Ask crew whether they know the route and trust it. Change the plan when it does not work [5]	Review notes, survey results
Handle data lawfully	Keep reports secure, limit access, set a retention period (section 7.3) [41]	Data protection notes, retention schedule

5.5 Steps we do not recommend relying on alone

- A policy that sits in a shared folder and is never briefed. The EHRC notes that training which is stale, or which workers do not understand, may not meet the defence [5].
- Responding only after an incident. The EHRC says investigation and discipline after the event will not be enough on its own [5].
- Telling crew to 'put up with it' because 'the customer comes first'. The EHRC gives this as an example of a practice that is unlikely to be justified [5].

6 Risk scenarios by area

Each scenario below is an Example written for this report. None describes a real event, person or organisation. The controls are options to consider in your risk assessment, not a fixed list.

6.1 Ingress and egress

Example situation	Before the event	On the day
Example. A guest in a queue makes repeated sexual comments to a steward checking tickets, and films the steward on a phone.	Assess queue posts as customer-facing and high contact. Plan supervisor sight lines and a code word. Put a conduct line in ticket terms.	Steward moves to another lane and calls the supervisor. Security speaks to the guest under venue policy. Supervisor logs the report and checks on the steward.

Example situation	Before the event	On the day
Example. At late egress, a group follows a lone runner towards the crew car park, shouting abuse about the runner's race.	Assess late egress and car park routes. Plan lighting, paired movement and a crew walk-out time.	Runner calls event control. Control sends 2 crew or security to accompany. Log entry. Report to the police if a crime may have taken place.

6.2 Bars

Example situation	Before the event	On the day
Example. A customer grabs a bar worker's wrist and makes sexual remarks when refused service.	Assess bars as alcohol-led, high-risk posts. Staff to a level where no worker is alone at a bar. Agree a refusal and support procedure with the bar operator and security.	Bar supervisor steps in, the worker leaves the front of the bar, security is called. Log the report. In England and Wales, a person with authority to sell alcohol commits an offence if they knowingly sell it to a person who is drunk [36]. For Scotland, see section 3.11.
Example. A regular at a weekly event makes mocking remarks about a bar worker's disability every week.	Use the log review to spot repeat behaviour. Brief bar staff that repeat comments are reportable even if each one seems small.	Supervisor logs each report and raises it with the operator. Agree a warning or ban with the venue.

6.3 Front of house

Example situation	Before the event	On the day
Example. An audience member repeatedly asks an usher about her religion, after she was seen wearing a headscarf, and makes hostile remarks.	Include front of house in the risk assessment. Put a conduct line in audience communications.	Usher moves away and reports to the house manager. House manager speaks to the person or asks security to. Log and follow up with the usher.
Example. A guest in a cloakroom queue makes a sexual comment to a cloakroom attendant who works alone.	Assess cloakrooms as lone, enclosed posts. Plan sight lines or a second attendant at peak times.	Attendant uses the code word on the radio. Supervisor attends. Log the report.

6.4 Stewarding

Example situation	Before the event	On the day
Example. At a pitch-side post, a fan shouts homophobic abuse at a steward for most of the second half.	Assess posts facing the crowd. Plan relief rotation. Agree with the client how abusive spectators are identified and dealt with.	Steward reports by radio. Supervisor rotates the steward off the post. Security or the client's team identifies the spectator under venue policy. Log entries.
Example. A steward at a festival campsite gate is asked for "a kiss to let you through" each evening by the same group.	Assess campsite gates as late, repeat-contact posts.	Steward reports each time. Supervisor changes the post and alerts security. Log and review the next day.

6.5 Artist liaison

Example situation	Before the event	On the day
Example. A member of an artist's entourage makes sexual advances to a runner in a dressing room corridor and asks the runner to come back after the show.	Assess backstage and dressing room areas. Agree with the promoter that the artist's team receives the conduct policy. Brief runners never to be required to go alone into closed rooms.	Runner reports to the production manager, who removes the runner from that task and raises it with the tour manager. Log the report.
Example. A tour manager mocks a crew member's age in front of the crew at load-in.	Put conduct expectations in the production advance.	Production manager records the comment and raises it with the tour manager. Check on the crew member.

6.6 Hospitality

Example situation	Before the event	On the day
Example. At a corporate dinner, a guest at a client's table touches a waiter and makes a sexual remark.	Agree with the client before the event that harassment of staff will be dealt with. Name a client contact on the night.	Waiter reports to the supervisor and moves to another section. Supervisor tells the client contact. Log the report. Follow up with the client in writing.
Example. A VIP lounge host is asked repeatedly to "smile more" and to sit with guests, and is criticised for refusing.	Assess VIP areas for power imbalance. Brief hosts that they will be supported if they refuse.	Supervisor steps in and resets expectations with the guests or the client contact. Log the report.

6.7 Accommodation

Example situation	Before the event	On the day
Example. On a touring job, a member of a supplier's crew knocks on a crew member's hotel door late at night after drinks at the bar.	Assess crew accommodation the employer arranges. Book rooms so crew are not isolated. Give an out-of-hours contact.	Crew member calls the out-of-hours contact. Contact speaks to the supplier's manager the next morning and changes rooming if needed. Log the report.
Example. Crew sharing a site campsite with the public receive repeated abuse about one crew member being trans.	Assess crew camping as accommodation linked to work. Plan a separate crew area and lighting.	Crew report to the site manager. Security checks of the crew area are increased. Log the report.

7 Tools

The tools in this section are OTAS templates. Adapt them to your organisation, your sites and your existing documents. They are not legal forms.

7.1 Action checklist

No.	Action	Level	Done
1	Know the reporting route and the 2 points from the briefing, and use them	Operational ●	☐
2	Report each incident as soon as it is safe, with the facts	Operational ●	☐
3	Set a reporting route for each site: named supervisor, call sign or code word, post-shift form	Tactical ●	☐
4	Add the 2 points to every pre-shift briefing	Tactical ●	☐
5	Train supervisors to listen, move crew, call security and record	Tactical ●	☐
6	Pair or support high-risk posts: bars, late egress, cloakrooms, backstage	Tactical ●	☐
7	Log every report in the event control log	Tactical ●	☐
8	Review reports at every debrief and change the plan	Tactical ●	☐
9	Check reporters face no loss of shifts or worse posts	Tactical ●	☐
10	Name one senior owner for harassment prevention	Strategic ●	☐
11	Add harassment by the public to the event risk assessment, with controls chosen and ruled out	Strategic ●	☐
12	Update the policy to cover third parties and all relevant protected characteristics	Strategic ●	☐
13	Add a conduct line to ticket, customer and client terms, and to signs	Strategic ●	☐
14	Raise the section 7.4 points with each client and venue	Strategic ●	☐
15	List every crew member's engagement basis	Strategic ●	☐
16	Set access and retention rules for harassment reports	Strategic ●	☐
17	Review the whole approach each season, and when the EHRC guidance or regulations change	Strategic ●	☐

7.2 Template briefing script

Use this at every pre-shift briefing. It takes about 1 minute. Fill in the blanks before the briefing.

"Before we start: harassment of any of you by the public, guests, clients, artists' teams or other contractors is not acceptable here. That includes sexual comments or touching, and abuse about your age, disability, race, religion, sex, sexual orientation or because you are trans.

If it happens, step away if you can. Then tell your supervisor or event control as soon as it is safe. Today your supervisor is _____. On the radio, use the call sign _____, or the code word _____. After the shift, you can also use the form at _____.

Do not try to remove anyone yourself. Security will deal with that. You will be supported, you can ask to move post and nobody loses shifts for reporting. Any questions?"

7.3 Reporting and log template

Event control log entries

Each entry has 4 parts: time, what was seen or reported, what was decided and who was told. Write facts, not opinions. Record radio messages as Radio entries. Never alter or remove an entry; correct it by adding a new one.

Time	Seen	Decided	Told
21:42	Example. Radio from Bar 2 supervisor: bar worker reports a customer grabbed her wrist and made a sexual remark after being refused service. Customer described.	Security to Bar 2. Bar worker off the front of the bar for a break.	Duty security manager, bar operator supervisor
21:49	Example. Radio from security: customer spoken to and escorted out under venue policy.	Bar worker offered a move to Bar 4 for the rest of the shift; she accepts.	Bar 2 supervisor, crew manager
23:30	Example. Crew manager checked in with the bar worker at the end of the shift. Post-shift form completed.	Report to be reviewed at the debrief.	Event manager

Post-shift report form

Date and event	
Time of the incident	
Location on site	
What happened, in your own words	
Description of the person, if known	
Witnesses	
Who you told, and when	
What support you would like	
Your name and contact (you can ask for this to be kept confidential)	

Handling the data

Harassment reports contain personal data and may contain special category data, such as information about a person's sex life, religion or health. UK GDPR and the Data Protection Act 2018 apply ^[41]. We recommend that you:

- limit access to those who need it, such as the owner named in section 5.4 and HR
- store reports securely, not in open group chats
- tell crew how reports will be used, in your privacy information
- set a retention period, and delete or anonymise reports after it ends
- keep summary data (dates, areas, types) for the trends review

The ICO's guidance on employment information, including keeping employment records, is listed in section 10 ^[41].

7.4 Contract points to raise with clients and venues

These are points to raise, not legal drafting. Take legal advice on the wording of any contract.

Point to raise	Why it matters
Who deals with an abusive guest, artist team member or contractor, and how fast	You must take all reasonable steps, but the client or venue may control removal and security ^[1]
That the venue's conduct policy covers harassment of supplied crew, and that guests are told	Telling the public is a step the guidance suggests ^{[5][19]}
That reports are shared both ways, promptly, with personal data handled lawfully	You need to know what happened to your crew to act and to keep a record ^[41]
That your supervisor can withdraw a crew member from a post without penalty	Moving the person at risk is often the fastest control

Point to raise	Why it matters
Staffing levels and security cover at high-risk posts	Lone working and alcohol are listed risk factors [5]
That the client's own staff and their guests will follow the conduct policy	Client staff are third parties to your crew [1]
That artist teams and suppliers receive the conduct policy in the advance	The theatre example in the EHRC guidance sends the policy to freelancers [5]
Crew accommodation and transport arranged by the client	Harassment there may be 'in the course of employment' [5]
A post-event review of any reports	Review is part of showing the steps work [5]
That nothing in the contract stops your crew reporting harassment or raising it with you, Acas, the EHRC or a tribunal	Reporters are protected from victimisation, and sexual harassment disclosures can be protected disclosures [27][12]

8 Frequently asked questions

Does this apply to us if we are a small company?

Yes. The rule applies to employers of every size [1]. What counts as reasonable depends on size and resources, among other factors [5]. A small crewing company is not expected to do what a large festival operator does, but it is expected to do what is reasonable for it.

Does it apply in Northern Ireland?

No. These provisions extend to England, Wales and Scotland [1]. Northern Ireland has its own equality law, which this report does not cover.

Does it cover only sexual harassment?

No. The third-party rule covers all harassment under section 26: conduct related to age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, as well as sexual harassment [16][17]. The separate preventative duty in section 40A covers sexual harassment only [4].

Is a single incident enough?

There is no requirement for earlier incidents [9]. A single act can be harassment if it meets the test in section 26. Trivial conduct, or conduct causing only minor offence, will not meet it [9].

Are we liable every time a guest behaves badly?

No. You are liable only if the harassment happened in the course of the employee's work and you failed to take all reasonable steps to prevent it [1]. The government says employers will not be expected "to foresee the wholly unforeseeable" [9].

Does it cover our freelancers?

It may. The Equality Act protects people on "a contract personally to do work" [20]. A freelancer who has to do the work personally, and works under your control, is likely to be protected. One with a real right to send a substitute is less likely to be [5]. Take advice where status is unclear.

What about volunteers?

The EHRC says volunteers are not protected under the work provisions, though they may be under the services provisions, and that this has not been tested in the courts [5]. We recommend protecting them in the same way.

We supply crew to a venue. Whose duty is it?

The duty sits with the employer, so it is likely to be yours [1]. The venue may also have duties as a principal under section 41 [21]. Agree the practical split in your contract (section 7.4).

Does it cover harassment online?

Acas says a third party "could harass someone online or in-person" [19]. Whether online abuse by a member of the public happened 'in the course of employment' will depend on the facts. Abuse sent to a work account, or about a crew member's work at your event, is more likely to be covered. That is our view, and it is untested.

Does it cover harassment at the crew hotel?

It can. The EHRC says 'in the course of employment' can include circumstances that are connected with work even when the worker is not working [5]. Accommodation you arrange for the job is likely to be closer to work than a private trip.

What about artists' performances and comedians' material?

The government says Article 10 of the European Convention on Human Rights still applies, and that any interference with freedom of expression should be necessary and proportionate [9]. Section 26(4) asks whether it is reasonable for the conduct to have the effect [16]. Material aimed at a crew member is different from material heard by crew in general. No tribunal has ruled on this under the new rule (section 9).

Can a crew member go straight to a tribunal?

In most cases they must first contact Acas for early conciliation [23]. The tribunal time limit is 6 months from the act complained of, or longer if the tribunal thinks it just and equitable [13].

Is there extra compensation?

Where a section 40 claim involves sexual harassment and the tribunal finds the employer breached section 40A(1), it may add up to 25% to the compensation [24]. Whether this applies to third-party cases has not been decided (section 9).

Does our existing harassment policy cover this?

Check it. Many policies cover only harassment by colleagues. Acas suggests reviewing policies, contracts with clients, customers and suppliers, and customer terms [19].

Where can crew get free advice?

Acas offers free, confidential advice on its helpline and website [42][11].

What happens when the EHRC guidance is updated?

The EHRC says it is updating its technical guidance [5]. Review your policy and this report against the new version when it is published.

9 What we don't know yet

These points were open on 20 October 2026. We will update this report when they change.

Open point	Where it stands	What to do now
Regulations on 'reasonable steps' under section 40B	Not made. Expected 2027/28, after consultation [9]	Follow the EHRC 4 stages and keep records. Watch for the consultation
The updated EHRC technical guidance	The EHRC says it is working on it [5]	Use the current version, reading paragraphs 3.22, 3.45 and 3.65 to 3.68 as out of date
Whether the compensation uplift applies to third-party cases	Section 124A refers to section 40, which now includes the third-party rule. No tribunal has ruled [24]	Assume it may apply
Freelancer status	Depends on the facts in each case [5]	List crew by engagement basis. Take advice on unclear groups
Supplied crew and the client's position	The new rule names the employer. Whether a principal is also liable under section 41 for third-party harassment of a contract worker is unclear [21]	Set out the split in the contract
Volunteers	The EHRC says this is untested [5]	Protect volunteers in the same way
Case law on the new rule	None yet. The rule starts on 30 October 2026 [2]	Keep a clear record of the steps you take
Online harassment	Acas says third parties can harass online [19]. How far 'in the course of employment' reaches online is untested	Include online abuse linked to the event in the policy
Performance content and free expression	Article 10 still applies [9]. No ruling yet on performance content	Agree conduct expectations with artist teams. Take advice on specific cases
Sector data	We found no verified statistic on harassment of event crew by the public in Great Britain	Use your own log data
Crew working outside Great Britain	This report covers work in Great Britain. We have not reviewed when the Equality Act applies to crew employed in Great Britain but working abroad	Take advice before touring or working outside Great Britain
Other Employment Rights Act changes	Acas lists a change to non-disclosure agreements among the 2027 changes, and says the government has not announced when in 2027 most of them will happen [11]	Check the position before any agreement includes confidentiality terms about harassment

10 Sources

Every source was opened and checked on 20 October 2026. Sources are numbered in the order they are first cited. Each entry gives the title, the publisher and the address.

1. Employment Rights Act 2025, s.21 (harassment by third parties). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2025/36/section/21>. Accessed 20 October 2026.
2. The Employment Rights Act 2025 (Commencement No. 6 and Transitional and Saving Provisions) Regulations 2026, SI 2026/1065, reg 3. legislation.gov.uk. <https://www.legislation.gov.uk/uksi/2026/1065/made>. Accessed 20 October 2026.
3. Employment Rights Act 2025, s.20 (employers to take all reasonable steps to prevent sexual harassment). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2025/36/section/20>. Accessed 20 October 2026.
4. Equality Act 2010, s.40A (employer duty to prevent sexual harassment of employees). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/40A>. Accessed 20 October 2026.
5. Equality and Human Rights Commission, Sexual harassment and harassment at work: technical guidance (published 30 January 2020, last updated 26 September 2024). EHRC. <https://www.equalityhumanrights.com/guidance/sexual-harassment-and-harassment-work-technical-guidance>. Accessed 20 October 2026.
6. Acas, Preventing sexual harassment. Acas. <https://www.acas.org.uk/sexual-harassment/steps-for-employers-to-prevent-sexual-harassment>. Accessed 20 October 2026.
7. Worker Protection (Amendment of Equality Act 2010) Act 2023, contents and s.5 (extent, commencement and short title). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2023/51/contents>. Accessed 20 October 2026.
8. Employment Rights Act 2025, s.22 (sexual harassment: power to make provision about 'reasonable steps'). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2025/36/section/22>. Accessed 20 October 2026.
9. Department for Business and Trade, Preventing workplace sexual harassment: enabling regulations about 'reasonable steps' (3 factsheets, including 'Harassment by third parties'). GOV.UK. <https://assets.publishing.service.gov.uk/media/6968f4653f43dfed1544b0d8/preventing-workplace-sexual-harassment-enabling-regulations-about-reasonable-steps.pdf>. Accessed 20 October 2026.
10. Equality Act 2010, s.40 (employees and applicants: harassment). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/40>. Accessed 20 October 2026.
11. Acas, Employment Rights Act 2025 (page last updated 20 October 2026). Acas. <https://www.acas.org.uk/employment-rights-act-2025>. Accessed 20 October 2026.
12. Employment Rights Act 2025, s.23 (protection of disclosures relating to sexual harassment). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2025/36/section/23>. Accessed 20 October 2026.
13. Equality Act 2010, s.123 (time limits). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/123>. Accessed 20 October 2026.
14. The Employment Rights Act 2025 (Commencement No. 5 and Transitional Provisions) (Amendment) Regulations 2026, SI 2026/954, regs 3 and 4. legislation.gov.uk. <https://www.legislation.gov.uk/uksi/2026/954/made>. Accessed 20 October 2026.
15. Equality Act 2010, s.109 (liability of employers and principals). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/109>. Accessed 20 October 2026.
16. Equality Act 2010, s.26 (harassment). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/26>. Accessed 20 October 2026.
17. Business.gov.uk, Workplace sexual harassment and third-party harassment (page last updated 17 September 2026). UK Government. <https://www.business.gov.uk/campaign/employment-changes/employers/workplace-sexual-harassment-and-third-party-harassment/>. Accessed 20 October 2026.
18. Acas, What sexual harassment is (page last updated 1 October 2026). Acas. <https://www.acas.org.uk/sexual-harassment>. Accessed 20 October 2026.
19. Acas, Third party harassment: harassment law changes (page last updated 26 August 2026). Acas. <https://www.acas.org.uk/employment-rights-act-2025/harassment-law-changes>. Accessed 20 October 2026.
20. Equality Act 2010, s.83 (interpretation and exceptions: meaning of employment). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/83>. Accessed 20 October 2026.
21. Equality Act 2010, s.41 (contract workers). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/41>. Accessed 20 October 2026.
22. Equality Act 2010, s.120 (jurisdiction of employment tribunals). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/120>. Accessed 20 October 2026.

23. Acas, Early conciliation. Acas. <https://www.acas.org.uk/early-conciliation>. Accessed 20 October 2026.
24. Equality Act 2010, s.124A (remedies: compensation uplift in sexual harassment cases). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/124A>. Accessed 20 October 2026.
25. Equality Act 2006, ss.20 to 24 and s.24A(1)(aa) (inserted by the Worker Protection (Amendment of Equality Act 2010) Act 2023, s.4(3)). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2006/3/part/1>. Accessed 20 October 2026.
26. Employment Tribunals Act 1996, s.37 (appeals from the Appeal Tribunal). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/1996/17/section/37>. Accessed 20 October 2026.
27. Equality Act 2010, s.27 (victimisation). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/27>. Accessed 20 October 2026.
28. Health and Safety at Work etc. Act 1974, s.2 (general duties of employers to their employees). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/1974/37/section/2>. Accessed 20 October 2026.
29. The Management of Health and Safety at Work Regulations 1999, reg 3 (risk assessment). legislation.gov.uk. <https://www.legislation.gov.uk/uksi/1999/3242/regulation/3>. Accessed 20 October 2026.
30. Health and Safety Executive, Violence and aggression at work. HSE. <https://www.hse.gov.uk/violence/index.htm>. Accessed 20 October 2026.
31. Health and Safety Executive, Violence at work: a guide for employers, INDG69(rev). HSE. <https://www.hse.gov.uk/pubns/indg69.pdf>. Accessed 20 October 2026.
32. Equality Act 2010, s.110 (liability of employees and agents). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2010/15/section/110>. Accessed 20 October 2026.
33. Protection from Harassment Act 1997, s.1 (prohibition of harassment, England and Wales). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/1997/40/section/1>. Accessed 20 October 2026.
34. Protection from Harassment Act 1997, s.8 (harassment, Scotland). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/1997/40/section/8>. Accessed 20 October 2026.
35. Criminal Justice and Licensing (Scotland) Act 2010, s.38 (threatening or abusive behaviour). legislation.gov.uk. <https://www.legislation.gov.uk/asp/2010/13/section/38>. Accessed 20 October 2026.
36. Licensing Act 2003, s.141 (sale of alcohol to a person who is drunk, England and Wales). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2003/17/section/141>. Accessed 20 October 2026.
37. Licensing Act 2003, s.143 (failure to leave licensed premises etc., England and Wales). legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/2003/17/section/143>. Accessed 20 October 2026.
38. Licensing (Scotland) Act 2005, s.115 (disorderly conduct). legislation.gov.uk. <https://www.legislation.gov.uk/asp/2005/16/section/115>. Accessed 20 October 2026.
39. Licensing (Scotland) Act 2005, s.116 (refusal to leave premises). legislation.gov.uk. <https://www.legislation.gov.uk/asp/2005/16/section/116>. Accessed 20 October 2026.
40. Acas, Sexual harassment: harassment law changes. Acas. <https://www.acas.org.uk/employment-rights-act-2025/harassment-law-changes/sexual-harassment>. Accessed 20 October 2026.
41. Information Commissioner's Office, Employment information (including Keeping employment records). ICO. <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/employment/>. Accessed 20 October 2026.
42. Acas, Acas helpline data. Acas. <https://www.acas.org.uk/about-us/service-statistics/helpline>. Accessed 20 October 2026.

Legislation and GOV.UK content: contains public sector information licensed under the Open Government Licence v3.0. The EHRC guidance was read on its website; its server did not allow an automated copy, so our checks of that source rely on the page as read on the access date.

11 Disclaimer and about this report

Not legal advice

This report is general information, not legal advice. It does not replace your own legal advice, risk assessments, policies or contracts. It is not an exclusion of anyone's liability. It sets out the law in England, Scotland and Wales as at 20 October 2026, and does not cover Northern Ireland. The law and guidance may change after that date. Check the current position at the sources in section 10 before acting.

This report is not endorsed by, and does not speak for, the Equality and Human Rights Commission, Acas, the Health and Safety Executive, the Information Commissioner's Office or the UK Government. The examples are illustrations written for this report. They do not describe real events, people or organisations.

Contains public sector information licensed under the Open Government Licence v3.0.

Published by OTAS Insights | Event Professionals Global News. Correct as of 20 October 2026. Last updated: 20 October 2026. Spotted an error? Tell us and we will correct it.

Work with OTAS

Do your shift briefings, reporting routes and contracts cover harassment of crew by the public?

[Request a call with OTAS to discuss how we can help](#)

OTAS Live Ltd is a private limited company registered in Scotland, company number SC755102.