

Employer Liability for Third Party Harassment at Work Changes from 30 October 2026

New laws mean that all employers, including convenience retailers, are legally accountable for ensuring they have taken “all reasonable steps” to prevent harassment of your staff from a “third-party,” for example customers.

Most convenience stores will already have in place reasonable steps to prevent harassment like CCTV, signage, and safety equipment, but you should review this summary, [ACAS’ guidance](#) and update your policies and procedures.

What is harassment?

Harassment is unwanted behaviour that violates someone’s dignity, or creates an intimidating, hostile, degrading, humiliating, or offensive environment for them. The full ACAS definition is [here](#).

In a convenience store, this could be the result of certain interactions with customers. Abuse often¹ occurs in stores when:

- Encountering shop thieves
- Verifying someone’s age
- Refusing to serve a customer

Who is a “third party”?

Anyone your staff deal with through work who does not work for you. In a convenience stores, this could mean:

- Customers
- Delivery drivers
- Sales reps
- Contractors

What does “all reasonable steps” mean?

All reasonable steps depends on your business size, its resources, and the type of work your staff do. A small store is **not** expected to do everything a larger business does. You should:

- take the steps that are reasonable for you
- focus on prevention
- keep a note of why you decided a step wasn’t reasonable

What you should do now

Many convenience retailers will already have reasonable steps in place, but you should review your existing risk assessments and procedures.

- **Assess the risks.** Think about late shifts, alcohol sales, refusals of age-restricted products.
- **Update your policy.** Your bullying and harassment policy should cover harassment from customers as well as colleagues, and sexual harassment.
- **Make it easy to report.** Give staff more than one person to report to and keep an incident log.
- **Train staff.** Cover what harassment is, how to report it, and how to de-escalate.
- **Tell customers.** Update notices at the till saying abuse of staff won’t be tolerated.

¹ ACS Crime Report 2026

- **Consider safety measures where proportionate.** For example, panic alarms, CCTV, body-worn cameras, or extra staff on higher-risk shifts.
- **Act on every report.** Never dismiss it as “part of the job”. You can refuse service to or ban the customer and report crimes to the police.

More information

- [Harassment law changes \(Acas\)](#)
- [Sexual harassment law changes \(Acas\)](#)
- [Preventing sexual harassment \(Acas\)](#)
- [Handling a harassment complaint \(Acas\)](#)
- [Sexual harassment and harassment at work: technical guidance \(EHRC\)](#)

This is general guidance only and is not legal advice. Always check the latest Acas and EHRC guidance.

ACS members are entitled to 30 minutes of free legal advice. For further information, please contact Jordan.newfield@acs.org.uk