

**Dated November 2024**

## **SEXUAL HARASSMENT POLICY**



## TABLE OF CONTENTS

Page | 1

1.	POLICY STATEMENT .....	1
2.	ABOUT THIS POLICY .....	1
3.	WHO DOES THIS POLICY APPLY TO? .....	1
4.	WHO IS RESPONSIBLE FOR THIS POLICY? .....	2
5.	WHAT IS SEXUAL HARASSMENT? .....	2
6.	WHAT IS THIRD PARTY HARASSMENT? .....	4
7.	What steps will be taken to prevent sexual harassment? .....	5
8.	IF YOU ARE BEING SEXUALLY HARASSED: INFORMAL STEPS .....	6
9.	HOW DO I RAISE A FORMAL COMPLAINT? .....	7
10.	WILL A FORMAL INVESTIGATION TAKE PLACE? .....	8
11.	WHAT ACTION MAY BE TAKEN FOLLOWING THE INVESTIGATION? .....	9
12.	DO I HAVE A RIGHT TO APPEAL IF I AM UNHAPPY WITH THE OUTCOME? .....	9
13.	WHAT IF I WITNESS SEXUAL HARASSMENT OR VICTIMISATION? .....	10
14.	What IF A COMPLAINT IS RAISED TO ME? .....	11
15.	WHAT SUPPORT IS AVAILABLE TO ME IF I AM VICTIM TO HARASSMENT OR BULLYING? .....	11
16.	REPORTING OUTCOMES, CONFIDENTIALITY AND RECORD-KEEPING .....	12

## **1. POLICY STATEMENT**

- 1.1 We are committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect. We recognise that sexual harassment can occur both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media.
- 1.2 Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. We will take active steps to help prevent the sexual harassment and victimisation of all staff. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support. Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us or are a third party outside of our control. Sexual Harassment may also constitute a criminal offence under different pieces of legislation and may result in the perpetrator being prosecuted.
- 1.3 Any sexual harassment which is found to have occurred will result in disciplinary action up to and including dismissal.
- 1.4 The law requires employers to take reasonable steps to prevent sexual harassment of workers in the course of their employment. This policy is part of the steps we will take to fulfil our legal duty.

## **2. ABOUT THIS POLICY**

- 2.1 The purpose of this policy is to set out a framework for staff to understand the policies which are in place to prevent sexual harassment from occurring and what their obligations are in relation to sexual harassment in the workplace. This policy can also be used by line managers to deal with any sexual harassment that occurs by staff (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

## **3. WHO DOES THIS POLICY APPLY TO?**

- (a) This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns across our business. This policy applies whilst you are working on any of our sites, on any third-party site, from home or otherwise from anywhere in connection with your duties.
- (b) This policy may also apply in environments outside of work where there is a close connection to work, including informal or formal work colleague social gatherings. This extends to external training events/conferences, work colleague informal social gatherings outside work hours and work organised social events. Note also, communications with work colleagues on any social media platform may also be caught by this policy (e.g. WhatsApp groups,

Facebook, Snapchat), given your relationship with the co-worker arises from the workplace.

- (c) The purpose of this policy is to prevent sexual harassment in the workplace. We set out in this policy what steps we will take as an employer to prevent this.

#### **4. WHO IS RESPONSIBLE FOR THIS POLICY?**

- 4.1 The Directors have overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the Line Managers and Centre Manager. Suggestions for change should be reported to your Line Manager or the Centre Manager.
- 4.2 your Line Manager or the Centre Manager have day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance.
- 4.3 This policy is reviewed annually and we will monitor its effectiveness.

#### **5. WHAT IS SEXUAL HARASSMENT?**

- 5.1 Sexual harassment is defined as any unwelcome conduct, advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature that interfere with an individual's work performance or creates an intimidating, hostile, or offensive work environment. Examples include unwanted comments, gestures, inappropriate jokes, or any form of unwarranted sexual attention. A single incident can amount to sexual harassment.
- 5.2 Sexual harassment may include, for example:
  - (a) flirting, gesturing, or making sexual remarks about someone's body, clothing, or appearance;
  - (b) asking questions about someone's sex life;
  - (c) telling sexually offensive jokes;
  - (d) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
  - (e) continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
  - (f) sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet) – note this can be a criminal offence too;
  - (g) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); or
  - (h) offensive emails, text messages or social media content.

#### **Less Favourable Treatment for Rejecting or Submitting to Sexual Harassment**

- 5.3 It also includes treating someone less favourably because of how they responded to previous sexual harassment. It applies whether the person rejected or submitted to (accepted) the previous harassment.
- 5.4 An example is if an employee receives several sexual advances from their manager but rejects them. Later, during the yearly performance review, the manager gives the employee a poor performance score. Despite being regularly praised by others for their hard work, this treatment is likely due to the rejection of the manager's advances.
- 5.5 A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace or being on the periphery as witness sexual harassment.

### **Victimisation**

- 5.6 Victimisation happens when someone is treated less favourably as a result of being involved with a discrimination or harassment complaint. Of course, this can include sexual harassment complaints. Victimisation involves subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:
- (a) Bringing a claim under the Equality Act 2010.
  - (b) Giving evidence or information in connection with a claim under the Equality Act 2010.
  - (c) Doing any other thing for the purposes of or in connection with the Equality Act 2010 (i.e. being a witness and supporting a fellow colleague's complaint of discrimination/sexual harassment).
  - (d) Alleging that a person has contravened the Equality Act 2010 (e.g. via a grievance).
- 5.7 Victimisation may include, for example:
- (a) Denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment.
  - (b) Excluding someone because they have raised a grievance about sexual harassment.
  - (c) Failing to promote someone because they accompanied another staff member to a grievance meeting.
  - (d) Dismissing someone because they gave evidence on behalf of another staff member during a grievance process or at an employment tribunal hearing.
  - (e) Labelling someone as a troublemaker because of a 'protected act'.
  - (f) Excluding someone from activities or refusing them opportunities because of a 'protected act'.

5.8 Sexual harassment, less favourable treatment and victimisation are all unlawful and will not be tolerated. They may lead to disciplinary action up to and including dismissal if they are committed:

- (a) In a work situation.
- (b) During any situation related to work, such as at a social event with colleagues.
- (c) Against a colleague or other person connected to us outside of a work situation, including on social media.
- (d) Against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.

5.9 We will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

## **6. WHAT IS THIRD PARTY HARASSMENT?**

6.1 The law requires employers to take reasonable steps to prevent sexual harassment by third parties. Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, unwelcome sexual advances from a client, customer or supplier visiting the employer's premises, or where a person is visiting a client, customer or supplier's premises or other location in the course of their employment.

6.2 Examples of third parties include:

- (i) Customers: For instance, in a café or shop.
- (ii) Clients: Such as during meetings or professional visits.
- (iii) Patients: In hospitals or care homes.
- (iv) Business contacts: At conferences or meetings.
- (v) Service users
- (vi) Delegates at a conference
- (vii) An agent acting on behalf of the employer
- (viii) Members of the public
- (ix) Other non-directly employed staff members: This includes friends and family of colleagues and independent contractors or agency workers.

6.3 Third-party sexual harassment can result in legal liability and will not be tolerated. All staff are encouraged to report any third-party harassment they are a victim of, or witness to, in accordance with this policy, to enable us to take appropriate action to prevent such third-party harassment being repeated.

- 6.4 Any sexual harassment by a member of staff against a third party may lead to disciplinary action up to and including dismissal.
- 6.5 To prevent third party sexual harassment, we are committed to adopting some or all of the below:
- (i) Conducting appropriate risk assessments;
  - (ii) Ensuring all employees and management know what is acceptable conduct from third parties and that management are aware of the appropriate actions to take after a complaint is raised;
  - (iii) Fostering a culture that prioritises respect and zero tolerance to harassment;
  - (iv) Issuing warning notices advising third parties that harassment of our employees is unlawful and will not be tolerated;
  - (v) Providing warning notices via recorded messages at the beginning of telephone calls advising that harassment of employees is unlawful and will not be tolerated;
  - (vi) Adding an express term into our contracts with third parties notifying them of our policy on harassment and requiring them to adhere to it.
  - (vii) Maintaining open communication channels and encouraging employees to report harassment by third parties, supporting employees who report such harassment and taking appropriate action in respect of every complaint of harassment by a third party.
- 6.6 If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. This may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other branches of the business.

## **7. WHAT STEPS WILL BE TAKEN TO PREVENT SEXUAL HARASSMENT?**

- 7.1 We are committed to maintaining a workplace free from sexual harassment by other employees and third parties.
- 7.2 We will raise awareness of our policies among our employees and remind them of the existence of the policies and what they contain, highlighting their key messages. We may communicate the policies and their contents using the following methods:
- (i) internal newsletters
  - (ii) physical or digital noticeboards
  - (iii) staff meetings
  - (iv) reminders to staff ahead of key events where the risk of harassment increases, such as an office party; and

- (v) an annual reminder to staff

If required, the policies can be translated, or provided in an accessible format for disabled workers.

- 7.3 Regular training will be conducted to educate employees on recognising, reporting and preventing sexual harassment. We will provide refresher sessions every 12 months following the induction training to comply with the preventative duty.
- 7.4 We have a culture of zero tolerance relating to sexual harassment which is supported by senior management. We encourage employees to **tackle and report** inappropriate behaviour. There are various methods in which a complaint or report can be raised. Please see below for more details.
- 7.5 Surveys may be emailed to you from time to time on an anonymised basis to obtain an accurate picture of sexual harassment instances at work and if you believe there are any steps that are not being taken to address sexual harassment at work, then this can be identified and actioned accordingly.
- 7.6 We have a thorough investigation procedure in place when there is a report of sexual harassment so that complaints are dealt with effectively, promptly and in a sensitive way.
- 7.7 Your Line Manager will adhere to the procedures set out in this policy and address sexual harassment complaints promptly and impartially.
- 7.8 Supervisors and Managers will be trained to address and prevent sexual harassment within their teams.
- 7.9 We will conduct regular risk assessments which will be reviewed every 12 months by management to assess the risks employees face in the course of their employment with us and take appropriate steps to reduce the risk, including but not limited to, lone working, gender power imbalances, third party contact and social media.
- 7.10 We are committed to promoting diversity and inclusion to grow a culture of respect to promote awareness and sensitivity to the experiences of all employees, including those who may be more vulnerable to harassment due to their identities.
- 7.11 This policy will be reviewed every 12 months to ensure that it is kept up to date and monitor its effectiveness.

## **8. IF YOU ARE BEING SEXUALLY HARASSED: INFORMAL STEPS**

- 8.1 If you are being sexually harassed, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, you should speak to your line manager or the HR Department, who can provide confidential advice and assistance in resolving the issue formally or informally. If you feel unable to speak to your line manager because the complaint concerns them, you should speak



informally to the HR Department. If this does not resolve the issue, you should follow the formal procedure below.

- 8.2 If you are not certain whether an incident or series of incidents amounts to sexual harassment, you should initially contact your line manager or the HR Department informally for confidential advice.
- 8.3 If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below.

## **9. HOW DO I RAISE A FORMAL COMPLAINT?**

- 9.1 In cases of sexual harassment, there is no specific form for raising such issues and your complaint should be raised in a manner you feel comfortable with. There are multiple reporting channels available to you to report harassment. Reports can be made under our grievance policy and procedure or our whistleblowing policy and procedure. When reporting through either of these policies, you can do so to your Line Manager, Centre Manager or to a Director. This is to ensure that you are not required to report an incident to the perpetrator or someone who you may feel may not be objective. However, please see steps below on how you can raise a formal complaint.
- 9.2 If you wish to make a formal complaint about sexual harassment, you should submit it in writing to your Line Manager or the Centre Manager.
- 9.3 Your written complaint should set out full details of the conduct in question, including the name of the harasser, the nature of the sexual harassment, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.
- 9.4 If you wish to make a formal complaint about victimisation, you should submit it in writing to your Line Manager or the Centre Manager.
- 9.5 Your written complaint should set out full details of the conduct in question, including the name of the person or persons you believe have victimised you, the reason you believe you have been victimised, the nature of the victimisation, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.
- 9.6 As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.
- 9.7 We will treat all complaints made with the strictest confidence, ensuring sensitivity, and will look to investigate the issue in a prompt and timely manner.
- 9.8 There is no time limit on you making a complaint under this policy following any incident.

## **10. WILL A FORMAL INVESTIGATION TAKE PLACE?**

- 10.1 We take all complaints of sexual harassment seriously and we will investigate complaints in a timely, respectful and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it.
- 10.2 We may arrange a meeting within 24 hours of receipt of a complaint to discuss with you any steps you feel are necessary to support you. We will consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser.
- 10.3 We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation.
- 10.4 After the meeting with you, we will undertake an investigation into the allegations which will be thorough, impartial and objective.
- 10.5 In order to discuss the outcome of your investigation, we will invite you to a meeting, usually within 7 days of the first meeting outlined above. You have the right to be accompanied to this meeting by either a fellow colleague or a Trade Union Representative.
- 10.6 Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the alleged harasser, who may also be accompanied by a colleague or trade union representative of their choice, to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.
- 10.7 It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, we will emphasise the matter is confidential (subject to any personal legal or regulatory obligations or rights) and that breach of confidentiality will be a disciplinary offence.
- 10.8 Where your complaint is about a third party such as a customer, supplier or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.
- 10.9 At the end of the investigation, the investigator will submit a report to a senior manager. The senior manager will consider the matter further and arrange a meeting with you, usually within seven days of receiving the report, in order to discuss the outcome and what action, if any, should be taken. Note, the decision to take disciplinary action against the alleged harasser and the level of such action is the Company's alone,

taking into account the findings and all the circumstances. You have the right to bring a colleague or a trade union representative to the meeting. A copy of the report and the senior manager's findings will be given to you and to the alleged harasser.

## **11. WHAT ACTION MAY BE TAKEN FOLLOWING THE INVESTIGATION?**

- 11.1 If the senior manager considers that there is a case to answer and the harasser is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. Our investigation into your complaint may be put on hold pending the outcome of the Disciplinary Procedure. Where the disciplinary outcome is that sexual harassment occurred, prompt action will be taken to address it.
- 11.2 The Company may explore, in certain cases, the feasibility of mediation between the harasser and the aggrieved. This may be accompanied by additional training for the harasser, either internally or externally. All staff are encouraged to consider engaging in mediation where it is offered as a solution, although the Company recognises that mediation will not always be appropriate.
- 11.3 If the harasser is a third party, such as a customer or other visitor, we will look to clarify the behaviour expected of their representatives or in very serious cases, ban them from our premises and/or terminate the contract with them.
- 11.4 Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation or counselling, or to change the duties, working location or reporting lines of one or both parties.
- 11.5 Any staff member who deliberately provides false information in bad faith, or who otherwise acts in bad faith as part of an investigation, may be subject to action under our Disciplinary Procedure. However, you will not be disciplined or treated detrimentally because your complaint has not been upheld.

## **12. DO I HAVE A RIGHT TO APPEAL IF I AM UNHAPPY WITH THE OUTCOME?**

- 12.1 If you are not satisfied with the outcome you may appeal in writing to your Line Manager, the Centre Manager or a Directors, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you. In submitting your appeal, you should state the full grounds upon which your appeal is based.
- 12.2 We will hold an appeal meeting, normally within seven days of receiving your written appeal. Where practicable, the appeal hearing will be conducted by an impartial manager who has not been previously involved in the case. They may ask anyone previously involved to be present. You have the right to bring a colleague or trade union representative to the meeting.
- 12.3 We will confirm our final decision in writing, usually within seven days of the appeal hearing. This is the end of the procedure and there is no further appeal.

### **13. WHAT IF I WITNESS SEXUAL HARASSMENT OR VICTIMISATION?**

13.1 Staff who witness sexual harassment or victimisation are strongly encouraged to take appropriate steps to report it to us. This is key to helping us remove sexual harassment from the workplace. Depending on the circumstances, this could include:

- (a) Intervening where you feel able to do so:
  - (i) If you see someone being sexually harassed, consider stepping in to stop it if you feel it's safe to do so.
  - (ii) Ensure your own safety and assess the situation before intervening.
- (b) Supporting the victim to report it or reporting it on their behalf:
  - (i) Encourage the person who experienced sexual harassment to make a formal complaint. Offer emotional support and let them know they are not alone. Remind them of this policy.
- (c) Reporting what you have seen where you feel that there may be a continuing risk if it is not reported:
  - (i) Document the incident by making a note of details such as dates, times, and names of those involved. Your account can be valuable evidence if the victim decides to take further action.
  - (ii) If the victim files a complaint or if there's an investigation, be prepared to give evidence as a witness. Your testimony can strengthen the case against the harasser.
- (d) Co-operating in any investigation into the incident.
- (e) Make your own complaint.
  - (i) If witnessing the harassment has affected you personally (violated your dignity or created an offensive environment), you can make a sexual harassment complaint yourself. You don't need the victim's permission to do so.
  - (ii) You must not be victimized for making or supporting a complaint or acting as a witness. This means you shouldn't be treated unfairly or stopped from giving evidence.

13.2 All witnesses will be provided with appropriate support and steps will be taken to protect the witness from victimisation or being subjected to a detriment by any other worker.

13.3 Remember, supporting victims and taking action against harassment contributes to a safer workplace for everyone.

#### **14. WHAT IF A COMPLAINT IS RAISED TO ME?**

14.1 When a sexual harassment complaint is raised to you, it's crucial to handle the situation promptly and appropriately. Here are the steps a manager should take:

- (a) Take the complaint seriously:
  - (i) Liaise with the HR department for support where appropriate.
  - (ii) Acknowledge the seriousness of the complaint. Show empathy and assure the person making the complaint that their concerns will be addressed.
  - (iii) Maintain confidentiality from the outset.
- (b) Investigate promptly:
  - (i) Begin an investigation as soon as possible. Gather relevant information and evidence.
  - (ii) Maintain confidentiality during the investigation process.
- (c) Act fairly and sensitively:
  - (i) Treat all parties involved fairly. Avoid making assumptions or judgements.
  - (ii) Avoid downplaying the complaint or implying that it's not serious.
- (d) Communicate with Transparency:
  - (i) Inform everyone involved about the process that will be followed.
  - (ii) Keep an open mind and avoid letting personal views influence your actions.
- (e) Follow the procedure as set out in this Policy.
- (f) Remember, handling sexual harassment complaints requires sensitivity, fairness, and adherence to established procedures.

#### **15. WHAT SUPPORT IS AVAILABLE TO ME IF I AM VICTIM TO HARASSMENT OR BULLYING?**

15.1 Staff who make complaints, report that they have witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

15.2 If you believe you have suffered any such treatment you should inform your Line Manager or the Centre Manager. If the matter is not remedied, you should raise it formally using our Grievance Procedure or this procedure if appropriate.

- 15.3 We will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation we receive to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.
- 15.4 If you need support or advice in respect of an incident under this policy, we provide access to the following support services:
- (i) A list of contacts within the employer;
  - (ii) Recognised Trade Unions;
  - (iii) Contacts for external support including:
    - (a) The Equality Advisory and Support Service ([www.equalityadvisoryservice.com](http://www.equalityadvisoryservice.com)).
    - (b) Protect ([www.protect-advice.org.uk](http://www.protect-advice.org.uk)).
    - (c) Victim support ([www.victimsupport.org.uk](http://www.victimsupport.org.uk)).
    - (d) Rape crisis ([www.rapecrisis.org.uk](http://www.rapecrisis.org.uk)).
    - (e) Rights of women (England and Wales) ([www.rightsofwomen.org.uk](http://www.rightsofwomen.org.uk)).
    - (f) Scottish Women's Rights Centre (Scotland) ([www.scottishwomensrightscentre.org.uk](http://www.scottishwomensrightscentre.org.uk)).
    - (g) Victim Support- recommended by Mind charity. You can call on 0808 168 9111, or email [victimsupport.org.uk](mailto:victimsupport.org.uk). The helpline Provides emotional and practical support for people affected by crime and traumatic events.
    - (h) National Stalking Helpline – you can call the helpline on weekdays on 0808 802 0300, or email [advice@stalkinghelpline.org](mailto:advice@stalkinghelpline.org). Crimestoppers – if you want to provide information about a crime without talking to the police, you can contact Crimestoppers anonymously on 0800 555 111.

## **16. REPORTING OUTCOMES, CONFIDENTIALITY AND RECORD-KEEPING**

- 16.1 Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.
- 16.2 When appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and any measures put in place to prevent a similar event happening again.

- 16.3 Information about a complaint by or about a staff member may be placed on their personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.
- 16.4 This policy is intended to ensure a safe and respectful working environment for all employees. All employees are expected to familiarise themselves with this policy and contribute to creating a workplace free from sexual harassment.