# HET Preventing Sexual Harassment at Work Policy

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## 1. History of Policy Changes

| Date | Page | Change | Origin of Change |
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**3. Introduction**

3.1 Hamwic Education Trust (HET) believe that all pupils should receive a high quality, enriching, learning experience in a safe and inclusive environment, which promotes excellence through a broad curriculum that prepares them for their future and opens doors to a diverse array of opportunities as well as that all pupils and adults within HET flourish as individuals and together.

3.2 HET is committed to providing a safe, inclusive and supportive work environment free from sexual harassment and ensuring the safety and dignity of all employees. Sexual harassment and victimising employees who report sexual harassment is unlawful and will not be tolerated. This policy outlines our commitment to preventing and addressing sexual harassment in the workplace.

3.3 Sexual harassment can have very serious consequences for individuals and HET including loss of morale, poor work performance, impact of wellbeing and ill health, increased turnover of employees, legal claims, and damage to our reputation.

3.4 Building on the work already being undertaken in HET in relation to low level concerns, HET will take reports of sexual harassment seriously and address them promptly and confidentially. Sexual harassment by an employee may be treated as gross misconduct leading to dismissal without notice pay under our HET Disciplinary Policy. Acts of sexual harassment may also amount to a safeguarding concern and may also require consideration of transferable risk under Keeping Children Safe in Education (KCSIE).

3.5 Any report of sexual harassment, including those carried out by third parties, as well as employees of HET will be initially dealt with in accordance with this policy, however there may be cases where it is appropriate to deal with such matters under the HET Whistleblowing Policy.

3.6 HET will ensure that whenever management receives a complaint of sexual harassment or otherwise knows of possible sexual harassment occurring, they will keep the investigation confidential, as far as it is reasonably possible to do so. All employees at all levels of HET are required to co-operate with any investigation of sexual harassment. On receipt, HET will also consider whether the allegation amounts to a low-level concern or whether it meets the threshold for reporting as a safeguarding concern under KCSIE, in addition to whether transferable risk is something that needs to be considered.

## 4. Scope

4.1 This Policy covers the prevention of sexual harassment that may take place within and/or outside of the workplace in the course of employment or engagement, including but not limited to working from home, work-related trips, at work-related events or social functions, on social media, or an outside of work situation where the incident is relevant to a person's suitability to carry out their role.

4.2 The Worker Protection (Amendment of Equality Act 2010) Act 2023 places a responsibility on organisations to take reasonable steps to prevent sexual harassment of their employees in the workplace. Under the Health and Safety at Work Act 1974, staff are entitled to a safe place and system of work.

4.3 The Employment Rights Act 2025 defines a disclosure that sexual harassment has occurred, is occurring or is likely to occur, as a qualifying discourse.

4.4 This Policy sets out a framework for line managers to deal with sexual harassment, and it applies to:

4.4.1 All employees, irrespective of seniority, service, working hours, or type of contract of employment (permanent, fixed term or temporary), consultants, apprentices, volunteers, governors and trustees, those undertaking work experience, agency workers; and

4.4.2 Third parties interacting with those listed in section 4.4.1, such as, pupils, parents, suppliers or visitors to the premises.

4.5 This policy does not form part of an employee's contract of employment, and it may be amended at any time. HET may also vary application of this procedure, including any timescales for action, as appropriate.

4.6 The HET Board has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the CEO. Suggestions for change should be reported to HET HR (hr@hamwic.org).

4.7 You can refer any questions about this policy to your line manager in the first instance. Alternatively, you may also refer questions about the operation of this policy or any particular concerns to the following: HET HR (hr@hamwic.org).

## 5. Definitions

For the purpose of this policy, the following definitions apply:

- 'HET' refers to Hamwic Education Trust.
- 'HR' in this policy, means Hamwic Education Trust HR.
- 'Manager' in this policy, is anyone as identified in the staffing structure with line management responsibilities. Training is provided for all managers.

## 6. Unwanted conduct: what is sexual harassment?

6.1 Sexual harassment is unwanted conduct of a sexual nature. It can be physical, verbal or non-verbal and it has the purpose and/or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It is important to be aware that, even if this is not the intent of the harasser, the effect of the behaviour on the receiving party may be taken into account.

6.2 Sexual harassment covers a range of conduct, which can include but is not limited to the following:

6.2.1 Unwelcome sexual advances or suggestive behaviour, which the alleged harasser may or may not perceive as harmless, including but not limited to:

a) Suggestive looks, staring, or leering;
b) Sexual propositions;
c) Requests or demands for sexual favours; or
d) Sexual gestures.

6.2.2 Sexual comments, stories, or jokes.

6.2.3 Comments on someone's appearance, with explicit sexual references or with sexual undertones and implications.

6.2.4 Intrusive questions about a person's private or sex life, or a person discussing their own sex life without a clear invitation to do so.

6.2.5 Posting and/or sharing offensive social media and/or internet content of a sexual nature.

6.2.6 Sending, displaying, and/or circulating sexually explicit material, including but not limited to emails, text messages, WhatsApp messages, video clips, and images sent by mobile phone or posted on the internet.

6.2.7 Initiating or spreading sexual rumours about a person.

6.2.8 Unwanted physical conduct or "horseplay" including unwelcome touching, hugging, massaging, patting, pinching, pushing, grabbing, or kissing.

6.2.9 Continually asking for and/or suggesting sexual activity after it has been made clear that the questions and/or suggestions are not welcome.

6.2.10 Wolf-whistling and catcalling.

6.2.11 Treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.

6.3 Anyone can experience sexual harassment, regardless of their sex and the sex of the alleged harasser. It can be carried out by men, women and people of any gender identity or sexual orientation.

6.4 HET will consider any aggravating factors, for example abuse of power by a senior employee over a more junior colleague, and/or previous harassing behaviour by the harasser, and intersecting forms of harassment such as racialised sexual harassment and sexual harassment targeted at LGBTQ+ people, when deciding what is the appropriate disciplinary action to take.

**7. Purpose of effect of unwanted conduct**

7.1 If unwanted conduct is intended to violate a person's dignity or create an offensive environment, the effect that it has on the individual is irrelevant. This is because the alleged harasser's intention alone can establish the offence, regardless of the actual impact on the victim, this principle emphasises that the mere act alone is sufficient to be considered sexual harassment.

7.2 Conduct can have the effect of violating a person's dignity or create an offensive environment and so amount to sexual harassment regardless of whether the alleged harasser intended for this outcome.

7.3 Conduct does not need to be explicitly objected to in order to be considered unwanted.

7.4 Unwanted conduct can occur as a single instance and does not need to be repeated to constitute sexual harassment.

7.5 Conduct does not have to be specifically directed at an individual to constitute sexual harassment as it may still create an intimidating, offensive, or degrading environment for them.

7.6 Sexual conduct that was previously welcomed can become unwanted conduct amounting to sexual harassment at any time.

**8. Active prevention of sexual harassment**

8.1 HET recognises that employers are required by law, to take reasonable steps to prevent sexual harassment of employees in the course of their employment. HET recognises that whilst there is no prescribed minimum on what an employer can do to prevent sexual harassment at work, there are reasonable steps that can help prevent sexual harassment including but not limited to:

8.1.1 Ensuring that the Preventing Sexual Harassment at Work Policy is in place, regularly reviewed and well communicated to all, including publishing the policy on the HET website.

8.1.2 Ensuring that all policies are cross referenced and interact well with the Preventing Sexual Harassment at Work Policy.

8.1.3 Ensuring that the effectiveness of policies is evaluated through means such as centralised records allowing trends to be analysed, anonymous employee surveys, asking questions to obtain an accurate picture of sexual harassment within the workplace.

8.1.4 Ensuring that proactive opportunities are provided to workers to disclose or raise issues about sexual harassment such as but not limited to, sickness or return to work meetings, 1 to 1s, professional development meetings and exit interviews.

8.1.5 Providing training to Line Managers on how to handle a sexual harassment complaint.

8.1.6 Ensuring all employees understand how to report sexual harassment which they may have been subject to or witnessed and the process to follow if sexual harassment is disclosed to them.

8.1.7 Regular mandatory anti-sexual harassment training for all, including acceptable/non-acceptable conduct.

8.1.8 Undertaking risk assessments in relation to sexual harassment, identifying the risks, including power imbalances and the control measures necessary to minimise them.

8.1.9 Promoting a culture of transparency where employees feel empowered and are encouraged to speak up by providing both formal and informal channels to report sexual harassment without the fear of repercussions.

8.2 HET will ensure that amongst its employees, reasonable steps will be taken to prevent sexual harassment and pre-emptively educate via:

8.2.1 Inductions and contracts of employment and engagement.

8.2.2 Regular annual mandatory anti-sexual harassment training for all employees.

8.2.3 Ensuring this policy is readily available and accessible to all employees; and

8.2.4 Communicating the steps that will be taken in response to a report of sexual harassment and what the possible outcomes may be. For example, warning a colleague about their behaviour, banning the employee from attending events, reporting any criminal acts to the police, or sharing information in line with our statutory duty.

8.3 We will consider at an early stage whether a report of sexual harassment amounts to a potential criminal offence and whether the Police should be informed. Sexual harassment amounting to a criminal offence may include, but is not limited to, sexual assault, indecent exposure, voyeurism, stalking, and offensive communications.

8.4 The decision to inform the Police will be the employees, unless HET considers that there is a serious and immediate risk of harm to the employee or another individual, in which case it is likely that the concern will amount to a safeguarding concern under KCSIE and will need to be reported to the LADO by HET HR. The LADO will follow their own procedures in considering what other agencies, if any, to inform. A decision to inform the LADO and / or the Police of a report of sexual harassment will not be taken lightly, and we will seek the employee's co-operation in advance of doing so where possible. If the LADO / Police do become involved, HET will liaise with the LADO / Police regarding our internal investigation into the report of sexual harassment and any subsequent disciplinary process, in order to prevent any prejudice to any criminal investigation and/or legal proceedings.

## 9. Third parties

9.1 HET will make third parties aware of this policy and ensure that it is readily available and accessible to all.

9.2 This policy makes clear that HET will not tolerate sexual harassment of its employees and sets out the actions that we may take if a third party sexually harasses an employee, including speaking with or writing to the alleged third party harasser or their superior (or both) about their behaviour, banning the alleged third party harasser from school premises (including parents and family members), banning the alleged third party harasser from working within or for HET, banning the third party organisation and persons employed by the third party from premises, events, meetings, or contacting employees, terminating any business relationship with the third party, reporting criminal acts to the police (please see section 6.3 of this policy for further detail), or sharing the information in line with any statutory or regulatory duty.

9.3 HET will also undertake the following steps to minimise the risk of sexual harassment of its staff by third parties:

9.3.1 Including a term in all contracts with third parties notifying them of the HET policy on preventing sexual harassment at work and requiring them to adhere to it.

## 10. Reporting sexual harassment

10.1 If you are not certain whether an incident or series of incidents amounts to sexual harassment, you should initially contact your line manager informally for confidential advice and support. If the reported concern is about your line manager, you should refer it to the School Leader or HET HR.

10.2 Anyone can disclose sexual harassment, there are various ways to do this:

- Speaking with their Line Manager.
- Speaking with a member of HET HR team.
- Speaking with mental health first aiders (if they have been appropriately trained).
- Speaking with a member of HET SLT.
- Speaking with a Governing Committee or Board Member.
- Speaking with the chair of any people resource group(s), (if they have been appropriately trained)
- Speaking to a trade union representative.

10.3 Via any of the processes listed above, the person listening to the reporter of sexual harassment may ask questions to establish the facts and document the answers.

10.4 The listener should guide the individual making the report to review sections 9 and 10 of this policy. This will help them understand the available options and decide on the appropriate course of action regarding the matters disclosed.

10.5 Should the individual reporting sexual harassment wish to raise a formal complaint, they should submit this in writing setting out the full details of the conduct or behaviour in question, including the name of the alleged 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 or prevent it from occurring. The written document may assist the reporter if they would like to avoid having to repeat their concerns verbally throughout the investigation process.

**If you witness sexual harassment or victimisation.**

10.6 Employees who witness sexual harassment or victimisation are encouraged to take appropriate steps to address it and will be supported where they do so. Depending on the circumstances, this could include:

10.6.1 Intervening where you feel able to do so.

10.6.2 Supporting the victim to report it or reporting it on their behalf.

10.6.3 Reporting the incident where they feel there may be a continuing risk if you do not report it.

10.6.4 Co-operating in any investigation into the incident.

10.7 All individuals reporting concerns and witnesses will be provided with appropriate support and will be protected from victimisation.

## 11. Informal steps to address reported concerns of sexual harassment

11.1 If you are being sexually harassed and feel able and safe to do so, you may consider raising the issue initially with the person responsible. This will enable you to have the opportunity to directly explain to the person why their behaviour is unwelcome, considered to be unacceptable, how their behaviour made you feel, and that it is unwanted conduct that you want to stop.

11.2 This direct approach is not an expectation of HET who will ensure that support is available if you would prefer not to approach the person responsible directly but would prefer an informal approach such as an appropriate manager or other appropriate employee advocating for you.

11.3 If informal steps have not been successful or are not possible or is not appropriate, you can raise a formal concern following the procedure detailed in section 10. You can also raise a formal concern if you want to report sexual harassment as a witness.

## 12. Raising a formal concern of sexual harassment

12.1 If you wish to formally report a concern about sexual harassment, you should inform the School Leader or HET HR whose role is to ensure that your concern is fully investigated, and further action taken where appropriate. If the reported concern is about that person, you should refer it to a member of the HET SLT or a Trustee who will record your reported concern in writing for the investigation process.

12.2 Once a concern has been formally reported, it will remain confidential between the employee and the person it was reported too, until the employee decides how they want to progress the matter and whether they want the reported concern to progress to a formal investigation.

12.3 In general, whilst it is up to you to decide how you want to progress the matter, we have a duty to prevent sexual harassment and to report matters that could amount to a safeguarding concern under KCSIE, to protect all employees and will pursue the matter if, in all the circumstances, we consider it appropriate to do so. These circumstances may include when there is a risk to your safety or to the safety of others. If HET does decide to take further action despite your wishes, we will explain our decision and ensure that we have put in place appropriate safeguards to prevent you from being further harassed or victimised and arrange support to deal with any impact the decision may have on you.

**13. Formal investigations**

13.1 We have a duty to conduct a fair investigation from the perspective of all parties concerned, including the reporter of the concern, any witnesses, and the alleged harasser. It is important that the alleged harasser is given full details of the reported concern made against them as it will otherwise be very difficult for them to fully respond without knowing who has accused them. In exceptional circumstances, where the reporter and/or a witness has a genuine fear of reprisals, an investigator may agree that a written report of concerns of sexual harassment and/or a witness statement can be anonymised.

13.2 Reports of sexual harassment will be dealt with in a timely, respectful and confidential manner. Individuals not involved in the report, or the investigation, should not be told about it. The investigation will be conducted by an appropriate person who is senior to the alleged harasser who has had no prior involvement in the report. An external investigator may be appointed if the circumstances require the organisation to appoint an individual from outside of HET to conduct the investigation. The investigation will be thorough, impartial, objective and carried out with sensitivity and due respect for the rights of all parties concerned.

13.3 HET will ensure that investigators, and any individual involved in the investigation process, are suitably trained in advance to understand the sensitivities of sexual harassment and are encouraged to take a trauma-based approach to the investigation and decision-making approaches.

13.4 A meeting will be arranged with the employee that has raised a concern, usually within 10 working days of a concern being reported. Employees have the right to be accompanied by a colleague or a trade union representative of their choice, who must respect the confidentiality of the investigation. The investigator will arrange further meetings with the employee as appropriate throughout the investigation.

13.5 Please refer to paragraph 10.5 regarding the use of an initial fact-finding document for this purpose. As far as it is reasonably possible to do so, employees will be kept updated about the timescales for the investigation process by the Investigating Officer. The Investigating Officer

will not provide any further detail at this stage regarding the investigation. If the Investigating Officer is an external third party, then HET HR will liaise with them to see if they can provide you with an update on the timescales for the investigation process.

13.6 Where a concern is about an employee, HET HR may need to consider whether a suspension of the alleged harasser is necessary on full pay, a request to remain at home or whether it is necessary to make other temporary changes to working arrangements pending the outcome of a suspension risk assessment, if circumstances require and there is no alternative to suspension. If HET HR decides to ask an employee to remain at home or suspend or make temporary changes to the alleged harasser's working arrangements whilst an investigation process is ongoing this does not constitute disciplinary action against them. Any suspension or temporary changes to working arrangements will be frequently reviewed to consider whether it is necessary and/or proportionate in the circumstances.

13.7 The investigator will 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 reported concerns about them, so that they can respond. See paragraph 11.1.

13.8 Employees that have raised a concern, the alleged harasser, and any witnesses to any of the incidents and behaviours in the reported concern, will be instructed not to discuss the matter with anyone else unless they have been authorised to do so. Confidentiality during the investigation is very important and any breach of confidentiality may lead to disciplinary action.

13.9 Where the concern is about someone other than an employee, such as a third party e.g., a contractor, parent, visitor or agency staff, HET HR will consider what action may be appropriate to protect anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the HET and the rights of that person. Where appropriate, HET HR will discuss the matter with the third party.

13.10 HET HR will also consider any request that an employee may make for temporary changes to their own working arrangements during the investigation, for example, changes to duties, location of work or working hours.

13.11 At the end of the investigation, the investigator will submit a report to the School Leader / HET DCEO who is nominated to consider the outcome of the investigation and to consider further action required as appropriate.

13.12 They will arrange a meeting with the employee who raised the concern, usually within 10 working days of receiving the concern, in order to discuss the outcome and what action, if any, should be taken. Employees have the right to bring a colleague or a trade union representative to the meeting.

## 14. Action following the investigation

14.1 If the School Leader / HET DCEO considers that sexual harassment occurred, prompt action will be taken in response. Further consideration will be given at this point in relation to whether the conduct either amounts to or continues to amount to a reportable safeguarding concern under KCSIE, in addition to any transferable risks that may require consideration under KCSIE.

14.2 Where the alleged harasser is an employee, the matter may be dealt with under the HET Disciplinary Policy.

14.3 Where the alleged harasser resigns part way through an investigation or following the investigation, HET will consider whether it is appropriate or not in the circumstances to proceed to a disciplinary hearing in the alleged harasser's absence. If the concerns have been assessed as amounting to a reportable safeguarding concern under KCSIE the process will be seen through to completion in order to come to one of the 5 outcomes under KCSIE. In any event, the School Leader / HET DCEO will arrange a meeting with the person who has reported the concerns to provide an update and to discuss next steps.

14.4 Where the alleged harasser is a third party, appropriate action might be speaking or writing to the person and/or their superior/employer about their conduct; or, in appropriate cases, banning the person from the premises or terminating the contract with them/their employer.

14.5 Whether or not a report of sexual harassment is upheld, and where the alleged harasser has not been dismissed because of the reported concern, HET HR will consider how best to manage any ongoing working relationship between those concerned. It may be appropriate to arrange some form of facilitated conversation, mediation and/or counselling or to change the duties, working location or reporting lines of one or both parties by agreement.

14.6 No one will be disciplined or treated detrimentally merely because they have reported a concern of sexual harassment or if the reported concern was not upheld. If there is evidence that shows or indicates that an employee has deliberately provided false information or has acted dishonestly as part of an investigation, they may be subject to action under the HET Disciplinary Policy.

## 15. Appeals

15.1 If the person reporting the concern is not satisfied with the outcome of an investigation they may appeal in writing to the School Leader/Governing Committee/CEO/Board of Trustees, stating their full grounds of appeal, within 5 working days of the date on which the decision was sent or given.

15.2 HET will endeavour to hold an appeal meeting, normally within 10 school working days of receiving a written appeal. The appeal hearing will be conducted by a more senior manager/a Committee of the Governing Committee/a Committee of the Board of Trustees, not previously involved in the case (although they may ask anyone previously involved to be present). Employees may bring a colleague or trade union representative to the appeal meeting.

15.3 The appeal hearing will not be a re-hearing of all the evidence reviewed during the investigation. It will be a review of the decision making process that led to the outcome of the investigation.

15.4 HET HR will confirm a decision on the appeal in writing, usually within 5 school working days of the appeal hearing. This is the end of the internal procedure and there is no further right of appeal.

## 16. Protection and support for those involved

16.1 An employee who reports a concern of sexual harassment or who participates in any investigation conducted under this policy must not suffer any form of retaliation or victimisation as a result of reporting a concern. The reporting of sexual harassment will, depending on the circumstances, amount to a qualifying disclosure under the Employment Rights Act 2025 and therefore carries additional protections. Anyone found to have retaliated against or victimised

someone in this way may be subject to a disciplinary process, subject to the provisions set out in paragraph 14.6.

16.2 Victimisation is subjecting a person to a detriment because they have:

16.2.1 Complained (whether formally or otherwise) that someone has sexually harassed them or someone else such as another employee or third party connected to the employer; or

16.2.2 Supported someone to make a report of sexual harassment; or

16.2.3 Given evidence in relation to a reported concern of sexual harassment; or

16.2.4 Brought legal proceedings for sexual harassment under the Equality Act; or

16.2.5 Given evidence or information in connection with legal proceedings for sexual harassment under the Equality Act

16.3 Victimising a person may include, but is not limited to:

16.3.1 Unreasonably denying their requests at work, for example annual leave requests;

16.3.2 Unreasonably denying them opportunities at work, for example promotions;

16.3.3 Bullying behaviour such as intimidation, mockery, being rude and/or dismissive;

16.3.4 Socially isolating them so they do not have the confidence to raise a grievance; or

16.3.5 Unfairly dismissing them.

16.4 If an individual believes they have suffered any such treatment they should inform their line manager, school leader or HET HR. If the matter is not remedied to a person's satisfaction, they can raise it formally using the channel outlined within section 10 of this Policy or via the HET Grievance Policy if they wish.

16.5 Anyone found to have retaliated against or victimised someone for making a report of sexual harassment or assisting with an investigation under this policy may be subject to the HET Disciplinary Policy.

16.6 If a report is made about a person's behaviour or conduct, it is important not to automatically dismiss it on the grounds that someone was merely joking or that the reporter is being overly sensitive. Recognise that individuals have diverse perceptions of acceptable conduct, and it is the right of every individual to define what is acceptable to them. It is important to respect these boundaries and to contribute to maintaining a work environment that is free from any form of sexual harassment. A person may have offended someone without intending to. If that is the case, the person concerned may be content with an explanation, an apology and an assurance that they understand the conduct and/or behaviour was unwanted and they will be careful in future not to behave in a way that may cause offence.

16.7 HET offer access to confidential counselling, which is available on request for anyone affected by, or accused of, sexual harassment. The details are available in confidence from HET HR or on the HET intranet.

16.8 Support and guidance can also be obtained from the following external services:

16.8.1 The Equality Advisory and Support Service (www.equalityadvisoryservice.com)
16.8.2 Protect (www.protect-advice.org.uk)
16.8.3 Victim support (www.victimsupport.org.uk)
16.8.4 Rape crisis (www.rapecrisis.org.uk)
16.8.5 Rights of Women (England and Wales) (www.rightsofwomen.org.uk)
16.8.6 ACAS (www.acas.org.uk)
16.8.7 Equality and Human Rights Commission (www.equalityhumanrights.com)
16.8.8 Education Support helpline - free and confidential emotional support for teachers and education employees - www.educationsupport.org.uk

## 17. Training

17.1 All new employees must complete the HET equity, diversity and inclusion training as part of their induction programme.

17.2 Every current employee and worker must complete regular equity, diversity and inclusion training on at least an annual basis.

17.3 We expect all our employees to proactively support our equity, diversity and inclusion initiatives by attending events and workshops to educate themselves on the challenges faced by others and how to help prevent and alleviate these issues in the workplace.

## 18. Confidentiality and data protection

18.1 Confidentiality is an important part of the procedures provided under this policy. Everyone involved in the operation of the policy, whether making a report or involved in any investigation, is responsible for observing the high level of confidentiality that is required. 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.

18.2 As part of the application of this policy, HET may collect, process and store personal data in accordance with our data protection policy. We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and the Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time. Records will be kept on the employee's personal file in accordance with our Workforce Privacy Notice, our Retention Schedule and in line with the requirements of Data Protection Legislation. This will include information about a complaint along with a record of the outcome and of any notes or other documents compiled during the process.

18.3 As previously stated at paragraph 13.8, a breach of confidentiality may give rise to disciplinary action under the HET Disciplinary Policy.

## 19. Review of this policy

19.1 This policy is reviewed and amended regularly by HET HR in consultation with the recognised trade unions. We will monitor the application and outcomes of this policy on an annual basis to ensure it is working effectively. This includes but is not limited to the following:

19.1.1 Providing refresher training to Line Managers.

19.1.2 Providing refresher training to all employees.

19.1.3 Conducting 1-2-1s with Line Managers and employees regarding the application and outcomes of the policy.

19.1.4 Conducting anonymous employee surveys for feedback on this policy and its implementation.

19.1.5 Updating this Policy in accordance with changes in the law, regulatory requirements, and best practice.

**20. Associated HET Policies**

- Data Protection Policy
- Disciplinary Policy
- Equity, Diversity and Inclusion Policy
- Grievance Policy
- Recruitment Policy
- Record Retention Schedule
- Whistleblowing Policy
- Workforce Privacy Notice

This policy will be reviewed 3 yearly by the owner