



SEXUAL MISCONDUCT POLICY

GIAN HEALTHCARE

Date Reviewed: 30 August 2025

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Next Review Date: 30 August 2026

Purpose

- Scope
- Policy Definitions
- Initial response to a disclosure of sexual misconduct
- Reporting sexual misconduct
- Reporting sexual misconduct as a witness
- Managing sexual misconduct reports
- Victimisation, including when no further action is taken
- Actions after an investigation
- Support
- Reporting to statutory regulators
- Police involvement
- Confidentiality
- Our roles and responsibilities
- Related Policies
- Related Guidance
- Training Statement

Purpose

Gian Healthcare Ltd is committed to taking a zero-tolerance approach to sexual misconduct in the workplace to create a culture at work where everybody feels safe. The new Worker Protection (Amendment of Equality Act 2010) Act 2023 creates a duty on employers to take reasonable steps to prevent sexual harassment in the workplace.

This policy:

- outlines our approach to tackling sexual misconduct and dealing with perpetrators
- describes what sexual misconduct is and how to report it
- adopts and signposts to processes in other Gian Healthcare Ltd employment policies such as respect at work (including bullying and harassment); social media; grievance; disciplinary; and managing concerns
- provides a summary of support available to employees

Gian Healthcare Ltd acknowledges that anyone can be a victim of sexual misconduct. However, it often occurs where there is a power imbalance and people in certain groups may be more vulnerable than others. For example, data* shows



that more women experience sexual misconduct than men and that black, ethnic minority, disabled and LGBTQ+ people experience sexual harassment and abuse at a disproportionate rate. Intersectional harassment occurs when the harassment relates to one or more protected characteristic.

Scope

Gian Healthcare Ltd is committed to protecting all employees from sexual misconduct, whether it occurs in physical or digital workspaces. This applies to employees, contractors, agency staff, volunteers, and temporary workers. We also have a responsibility to protect third-party individuals, such as suppliers or visitors, from misconduct by anyone within the workplace.

Third-party organizations deploying their employees to work with Gian Healthcare Ltd are expected to cooperate fully in any investigations into sexual misconduct and take appropriate action based on the outcomes.

Sexual misconduct can occur in any setting, including the workplace, work events, business travel, or virtual environments. This policy applies to incidents that happen on company premises or in any other location that may not be a designated workplace.

If employees experience sexual misconduct from individuals not employed by Gian Healthcare Ltd, we will take it just as seriously. In such cases, Gian Healthcare Ltd will:

- Not tolerate any conduct that constitutes sexual misconduct, whether on our premises or in any environment.
- Report any allegations to the perpetrator's employer or representative organization immediately, ensuring the safety of all involved.
- Take necessary action, which may include removing the alleged perpetrator from the premises, pending the outcome of the investigation. This will be coordinated by our Human Resources team.

Policy Definition

Definitions of people and roles that may be involved in a sexual misconduct report include:

- **complainant** – a person who has raised a concern of sexual misconduct. This could be an individual who has alleged they have experienced sexual misconduct, or a line manager/colleague who is reporting on their behalf. See section 5 on how to report a concern
- **alleged perpetrator** – an individual about whom a sexual misconduct report has been raised

- **witness** – a person who has witnessed an alleged instance of sexual misconduct and/or can give relevant evidence that may form part of an investigation, where indicated
- **investigator** – where an investigation is appropriate a suitably trained investigator will be appointed
- **subject matter expert** – in some cases it may be appropriate to take specialist or expert advice. This may be provided by an appropriate subject matter expert

What is Sexual Misconduct?

Sexual misconduct refers to uninvited, unwelcome, or non-consensual behavior of a sexual nature. This includes actions that may offend, harm, or intimidate an individual or group and can involve harassment, violence, or abuse. Sexual misconduct can be physical, verbal, or visual, and may occur through mediums like emails or phone messages.

Some forms of sexual misconduct may also constitute criminal offenses, such as sexual assault, rape, stalking, or revenge pornography, as outlined in legislation like the Sexual Offences Act 2003 and the Protection from Harassment Act 1997.

Types of Sexual Misconduct

- **Sexual Violence/Sexual Assault:** Includes acts like verbal harassment, groping, forced kissing, or coercion through intimidation or physical force.
- **Sexual Harassment:** Defined by the Equality Act 2010, it includes any behavior of a sexual nature that creates an intimidating, hostile, or offensive environment. Examples include:
 - Making sexual remarks about someone's body or appearance
 - Asking intrusive questions about someone's sex life
 - Sharing sexually offensive jokes, images, or content
 - Stalking or voyeurism

Key Points about Sexual Harassment

Sexual harassment can happen to anyone, regardless of their gender or sexual orientation, and can be perpetrated by individuals of any gender identity. Even a single incident may qualify as harassment, especially if it creates a hostile environment for the individual.

'Jokes' or 'Banter' vs. Sexual Misconduct

What might be considered as joking or banter can still be sexual misconduct if:

- It is sexual in nature
- It is uninvited or unwanted
- It violates someone's dignity or creates a hostile environment

Reporting Sexual Misconduct



If you're unsure whether something constitutes sexual misconduct but believe it might, you are encouraged to report it. All reports will be taken seriously and addressed accordingly.

Initial response to a disclosure of sexual misconduct

If someone has experienced or witnessed sexual misconduct, they may choose to confide in anyone at the workplace – a line manager, colleague, or someone in a position of trust. This is referred to as a “disclosure.” The response to such disclosures must be handled with care and sensitivity, and all employees should be aware of how to manage them appropriately. Even if no previous disclosure was made, employees may choose to formally report sexual misconduct, and the same steps should be followed.

When receiving a disclosure, the following steps should be taken:

- Ensure the individual's safety:
If there are concerns about immediate danger or safety, call the police and consult with HR for guidance.
If there are safeguarding issues (e.g., concerns of coercion or mental capacity), contact the Safeguarding team for urgent assistance. HR should be notified immediately to ensure support is provided.
Consider what steps can be taken to ensure safety, such as offering alternative work locations or remote working if the incident occurred at the office.
- Inform the individual about this policy:
Direct them to the available support options.
Encourage them to report their concerns if they haven't already.
Make a note of the disclosure details, including time, date, individuals involved, and any actions taken. Ensure confidentiality is respected.
- If the complainant wishes to stop the process, their wishes should be respected, but support should be provided if needed. If you require guidance after a disclosure, seek confidential support from HR or a line manager.

Ensure all guidance is followed, including any formal reports that may arise from the disclosure.

Reporting sexual misconduct

How to report sexual misconduct

Gian Healthcare Ltd strongly encourages all employees to report any instances of sexual misconduct. Early reporting is encouraged. However, there may be times when a complainant does not want to or feels unable to make a report soon after an alleged incident(s) of sexual misconduct. The barriers to early reporting are



understood and acknowledged and a delayed decision to make a report will be respected and not treated with suspicion. There is no time limit for reports of sexual misconduct to be received.

There are 3 routes through which sexual misconduct may be reported to commence processes under this policy:

- HR – a complainant or witness may contact their HR directly, or they may ask the person they have disclosed to, for example their line manager, to do this for them
- Online sexual misconduct reporting form (with option for anonymous reporting) – a complainant or witness may complete this form themselves, or they may ask the person they have disclosed to, or a supporter, such as a Trade Union supporter, line manager or domestic abuse and sexual violence ally to assist them in completing it
- Freedom To Speak Up (FTSU) Guardian – a complainant or witness may seek the assistance of a FTSU Guardian in reporting an incident

Reports may also be made to a line manager or senior colleague; however, to instigate a formal report one of the three routes above will need to be completed, and a line manager and senior colleague can action these on someone's behalf. All reports will be taken seriously (including those that are made anonymously), regardless of the route taken. Please see section 7 for how sexual misconduct reports are managed.

Raising a report of sexual misconduct anonymously

Individuals are able and encouraged to report an incident anonymously through our online reporting form if they do not feel comfortable providing a full report. However, it is preferable for individuals making a report to identify themselves, as this makes it more likely that reports can be fully and fairly investigated and/or resolved and contributes to creating an open and trusting culture. It also means the colleague reporting the sexual misconduct can be kept informed, where appropriate, as to the progress of their report. However, it is recognised this is not always possible. If a report is made anonymously, the steps in this policy must be followed as closely as possible based on the information provided in the disclosure.

Sexual misconduct from service users, members of the public or third parties

Employees may experience sexual misconduct from service users, members of the public or third parties. Any instance of work-related sexual misconduct should be reported in line with this policy regardless of who the alleged perpetrator is.

Reporting sexual misconduct as a witness

If you witness what you think may be sexual misconduct in the workplace, you should consider the following actions:

- offer support to the individual targeted or affected by the behaviour you have witnessed, and/or let them know you feel the behaviour you witnessed is unacceptable, if it is safe to do so
- wherever possible, report the behaviour using the mechanisms outlined above

Reporting sexual misconduct is vital to ensure that Gian Healthcare Ltd can protect its employees and meet its duty to prevent sexual harassment in the workplace. Before you report the behaviour, you may wish to approach the individual who has been subjected to the sexual misconduct, so they are aware of your intention to report it. Whether they consent or not, you should name the person who has subjected the individual to the behaviour. Witnesses of sexual misconduct can report it anonymously using the online form, however reporting using identifiable routes is always encouraged.

Managing sexual misconduct reports

Gian Healthcare Ltd will ensure that any allegations of potential sexual misconduct are managed swiftly and in line with the appropriate organizational policies and procedures. Experiencing sexual misconduct is extremely distressing and can be life changing. It's also distressing and a serious matter for an employee to be accused of sexual misconduct. Gian Healthcare Ltd will not presume the accusation is either true or false prior to a fair and thorough investigation.

Sexual misconduct cases will sometimes only be evidenced by the complainant's word against that of the alleged perpetrator. This should not prevent the complainant from speaking up. Gian Healthcare Ltd commits to treat all complaints seriously and fairly.

Investigators of allegations of sexual misconduct will take particular care about the relevance and intrusiveness of questions required to investigate these matters. This includes taking great care when asking questions of a personal nature. Greater flexibility may be applied to the complainant's right to be accompanied to meetings related to investigating the complaint, particularly by a friend or family member (in a supportive capacity), in addition to the usual right to be accompanied by a trade union representative or work colleague.

Role of a Screening Advisory Assessment Meeting (SAAM)

HR will undertake an immediate screening of a report by establishing a screening advisory assessment meeting (SAAM) that may involve:

- the individual (or team) with whom the report has been raised
- an individual(s) with appropriate subject matter expertise
- a member of the HR team who has undertaken specialist sexual misconduct training and/or the relevant HR for that area
- safeguarding colleagues who will advise on involving a Person in Position of Trust (PIPOT) (adult abuse) or a Local Authority Designated Officer (LADO)

(child abuse). More detailed definitions on the roles of PIPOt and LADO are in section 4 of the safeguarding policy

- any other relevant individual deemed able to provide advice

Next steps following a Screening Advisory Assessment Meeting

Following the screening assessment, the following actions, which are not mutually exclusive, may be considered as next steps:

- further fact finding
- consideration of the alleged conduct under the terms of Gian Healthcare Ltd's disciplinary policy. Alleged sexual misconduct will generally be considered as serious misconduct, however in rare cases, the conduct may be considered under the 'minor misconduct' processes outlined in that. This means referring the matter to the line manager, which may involve 'informal action' under that policy. Other policies, such as respect at work (including bullying and harassment) may also help inform next steps
- if a sexual misconduct report has been raised as a grievance, the grievance policy will be followed to consider next steps
- notifying the police and/or other relevant agencies, including the alleged perpetrator's employers if their employer is not Gian Healthcare Ltd
- if an investigation is commissioned through the disciplinary policy or grievance policy a case manager will be appointed who will ensure the process is carried out in line with the relevant policy and process. Please see the relevant policy for details of a case manager's role

Investigations will be conducted in accordance with the relevant Gian Healthcare Ltd policy. There will be additional considerations and adjustments when the investigation is regarding sexual misconduct. These considerations and adjustments listed below apply to all investigations under the relevant Gian Healthcare Ltd policy:

- an externally sourced investigator (with the relevant skills and experience), independent of the investigating organisation (including all employees and representatives) may be appointed
- HR or the manager may appoint a subject matter expert(s) to support the investigating officer and/or case manager
- greater flexibility will be applied to the complainant's right to be accompanied, particularly by a friend or family member (in a supportive capacity) in addition to the usual right to be accompanied by a trade union representative or workplace colleague
- where complainants and alleged perpetrators work together, it may be necessary to discuss temporary changes to working arrangements. It is not normal practice to move a complainant as a first step, unless they have requested this and our organisation will seek to move alleged perpetrators, wherever possible
- the complainant or individual who has reported sexual misconduct and the alleged perpetrator will be updated sensitively and independently of each



other by the case manager throughout any formal process, but they will not normally be informed of the outcome or action taken where this relates to personal and/or confidential information of another employee

Other support to be given during processes

- Gian Healthcare Ltd will seek to offer a trauma informed approach to individuals who are subject to behaviour that may be sexual misconduct
- As part of our supportive approach, where concerns regarding attendance and/or capability of the complainant or an alleged perpetrator, temporary adjustments to the attendance and/or capability process will be considered by the case/ commissioning manager and/or line manager to ensure any processes can be undertaken without delay. Any adjustments should be recorded by the complainant or the alleged perpetrator, and shared with their line manager, and their trade union representative, if appropriate, and reviewed every 2 weeks.

If the individual subjected to or reporting the alleged sexual misconduct does not want further action to be taken, sensitive consideration will be given. However, Gian Healthcare Ltd will determine what action it ought to take, in line with this policy, independently of the report of sexual misconduct raised. This may involve wider agencies such as local authority colleagues or police if deemed appropriate.

Victimization, including when no further action is taken

There will be no negative consequences for individuals or teams who have made reports of sexual misconduct that are not upheld or taken forward, except in limited circumstances outlined in section 9.6.

Gian Healthcare Ltd does not tolerate harassment or victimization of anyone reporting sexual misconduct and will not tolerate any attempt to persuade or force an employee not to raise their concerns. 'Victimization' is when someone is treated less favorably as a result of being involved with a discrimination or harassment complaint and is unlawful under the Equality Act. Gian Healthcare Ltd will uphold its duty of care to ensure colleagues are fully supported when reporting sexual misconduct, whether their complaint is upheld or not.

Any retaliation and victimization of an individual raising a report or acting as a witness should be reported to a line manager or HR and will be addressed. This may result in action being taken under the disciplinary policy.

Actions after an investigation

The outcomes will follow the relevant Gian Healthcare Ltd policy.

Gian Healthcare Ltd recognizes that in some cases it may be appropriate to signpost perpetrators to specialist services if they genuinely want to change their behavior – to be agreed on a case-by-case basis.



If a contractor or agency worker is found to be in breach of this policy and other relevant policies such as the grievance and/or disciplinary policies after an investigation, their contract may be terminated immediately.

To provide assurance the matter has been addressed appropriately, Gian Healthcare Ltd may share some aspects of an investigation and/or their outcomes with the complainant. This will be considered on a case-by-case basis. Any sharing of information must be compliant with relevant data protection laws and align to Gian Healthcare Ltd.'s information governance policy.

Gian Healthcare Ltd employees who raise a report of sexual misconduct in good faith (whether founded or not) will always be supported. An employee who is found to have deliberately made false allegations of a vexatious nature may be subject to disciplinary action as outlined in the disciplinary policy.

Support

Managing and supporting disclosures and reports of sexual misconduct is challenging for all parties involved. Gian Healthcare Ltd will offer trauma informed support to the complainant, alleged perpetrator and any witnesses as well as line managers and anyone else affected by the disclosure. A range of internal and external support services are available

Incidents of sexual misconduct can have long-term impacts on those who directly experience them as well as their friends and family. A complainant may need adjustments to support them to fulfil their role and workload, especially while any investigation is ongoing. The complainant should have a conversation with their line manager (or nominated person, which may include an occupational health professional) to review matters such as their current working arrangements and consider whether any additional support is needed, for example, by using the flexible working or special leave policies.

Where concerns regarding attendance and/or capability of the complainant may be connected to a sexual misconduct incident, adjustments to the attendance and/or capability process will be considered by the individual's line manager and with their HR. Any adjustments should be recorded and reviewed every 2 weeks, documented and shared with the relevant parties such as the individual and/or their line manager and their trade union representative.

It is recognised that when receiving a disclosure or complaint of sexual misconduct, it may be distressing or triggering for the individual who receives it. If this is the case, contact your HR.



Reporting to statutory regulators

Gian Healthcare Ltd reserves the right and may be obliged to report an employee holding a professional registration of any description to their relevant statutory regulator (for example, National Association of Care & Support Workers (NACAS), Nursing and Midwifery Council, General Medical Council, The Health and Care Professions Council, the Law Society) in accordance with their relevant professional codes of conduct.

The designated staff for ensuring that Gian Healthcare Ltd makes an appropriate referral will be the Designated Safeguarding Lead. HR may take advice from a range of individuals including the most senior professional of the profession within Gian Healthcare Ltd, for example, the Registered Manager before making a formal referral.

When making a referral the DSL will do this in accordance with Gian Healthcare Ltd's professional registration policy.

Police involvement

A disclosure of sexual misconduct may allege a criminal act. In such a case, Gian Healthcare Ltd's HR team will be responsible for ensuring that any allegations received that may be criminal in nature are referred to the police. Where possible a conversation with the complainant on their wish for police involvement should precede any referral. If you believe there is a danger to life, you should call the police.

The HR team routinely works with the Safeguarding team using our safeguarding policy to review each case on a case-by-case basis and consider the need of escalation to relevant authorities, including the police and referrals are made where there is concern that the allegations may constitute a criminal act. Gian Healthcare Ltd will ensure that matters are referred to the wider authorities such as the relevant Local Authority Designated Officer and/or the relevant local authority Safeguarding team where appropriate.

Where an internal investigation is taking place, Gian Healthcare Ltd's HR will consult with the police at agreed intervals about concurrent investigation processes to ensure the criminal investigation/process is not prejudiced.

Complainants can report sexual misconduct to the police directly. They may express a wish that they do not want to prosecute, or they wish to report and think about prosecution later. These are matters that must be discussed with the police directly.



Confidentiality

Confidentiality covered by this policy will be maintained wherever possible, subject to legal and statutory safeguarding obligations and duties to protect other people.

Details of investigations and complaints must only be disclosed on a 'need to know' basis. Unauthorized disclosure of confidential information may result in disciplinary action, as may any concerns about attempts to influence or intimidate a witness.

Gian Healthcare Ltd does not use confidentiality or non-disclosure agreements to prevent reporting of sexual misconduct or whistleblowing.

Data will be collated centrally by the HR Employee Relations team and only shared on a need-to-know basis to inform the investigations and preventative actions. Some anonymized data will be shared with the Executive Group to facilitate oversight of this policy such as the number of cases, outcomes and overall summary data. This will not include personally identifiable data and will provide assurance to the Executive Group that allegations relating to sexual misconduct are being managed accordingly.

Confidentiality obligations apply to anyone who is involved including the alleged perpetrator, the complainant, witnesses and line managers. The matter should not be discussed with anyone else other than the investigating officer, HR colleagues directly involved, and where represented, trade union representatives. This does not mean that support should not or could not be sought, acknowledging that talking about the event may help some people. However, this must be done adhering to confidentiality obligations.

Witnesses will be identified as early as possible and be supported on a trauma informed basis by Gian Healthcare Ltd's HR team to provide a confidential statement as part of any internal process being conducted.

Witnesses should not be approached by anyone other than the HR colleagues if they are required to provide formal evidence or a witness statement to the police and colleagues will be provided with support from a suitably trained advocate as part of the witness statement making process.

Our Roles and Responsibilities

Organisational Responsibilities

Gian Healthcare Ltd is dedicated to fostering a culture of safety, respect, and accountability to prevent workplace misconduct, particularly sexual misconduct. We aim to create an environment where colleagues can openly discuss and report incidents without fear of retaliation or victimisation, while also taking active steps to prevent such behaviour.

To support this, Gian Healthcare Ltd will:

- Regularly review data related to sexual misconduct and use these insights to improve safety practices within the workplace.

- Ensure that all employees are informed about sexual misconduct issues, the company's sexual misconduct policy, and how to appropriately handle disclosures.
- Take proactive measures to prevent sexual misconduct.
- Encourage managers to engage with employees about their working relationships and environment during 1:1 meetings.
- Appoint a designated Compliance Manager, responsible for sexual safety in the organisation.
- Appoint a Domestic Abuse and Sexual Violence Lead within the company.

All colleagues should:

- Challenge inappropriate behaviour when safe to do so, and report it.
- Foster a culture of openness and transparency, where unwanted, harmful, or inappropriate sexual behaviour is not tolerated.
- Maintain confidentiality, unless there is a safeguarding concern that must be reported.
- Familiarise themselves with, and follow, the principles outlined in the Sexual Safety Charter.

Responsibilities of Line Managers:

Line managers play a crucial role in supporting a culture of sexual safety. They should:

- Provide support and/or signpost employees to appropriate resources if they disclose sexual misconduct.
- Report any incidents to HR as necessary, in line with the policy.
- Ensure the implementation of reasonable adjustments, including a Workplace Safety Plan if required.
- Be available to assist with investigations where appropriate.
- Create a supportive work environment where employees feel safe raising concerns and are listened to.
- Maintain confidentiality, unless there is a safeguarding concern that needs to be addressed.
- Support alleged perpetrators and/or direct them to the necessary resources.
- Model professional and equal behaviour in the workplace.
- Be prepared to report instances of sexual misconduct, taking into account confidentiality and the complainant's wishes, if needed.

Responsibilities of HR Colleagues:

HR staff are key in managing the process and providing expertise throughout. They will:

- Offer guidance at every stage of a complaint, providing support to the complainant, line manager, alleged perpetrator, and investigation team.
- Ensure confidentiality is upheld unless a safeguarding concern requires disclosure.
- Direct employees to the appropriate support resources.
- Manage all case information according to the records management policy.



Responsibilities of Freedom to Speak Up Guardians:

Freedom to Speak Up Guardians are integral in maintaining a safe reporting environment. They should:

- Provide support and signpost employees to relevant resources when they experience sexual misconduct.
- Assist with the reporting process as appropriate.
- Offer support during investigations when needed.
- Contribute to the creation of a work environment where employees feel heard and safe to raise concerns.

Responsibilities of Trade Unions:

Trade unions help ensure the fair application of the policy and support employees. Their responsibilities include:

- Promoting this policy, explaining reporting procedures, and assisting with the reporting process as needed.
- Offering guidance on available internal and external support options before, during, and after the process.
- Supporting members through both informal and formal procedures.

Responsibilities of Individuals in Leadership Positions:

Leaders must be aware of their influence and the potential vulnerabilities of others. They should:

- Recognise the power imbalance that can increase the vulnerability of some employees.
- Never misuse their position for personal gain or demand sexual favours.
- Ensure no employee is subjected to inappropriate behaviour, such as offensive jokes or banter.
- Be particularly mindful of the increased risks faced by women and minority groups (e.g., gender, race, sexuality, trans status, religion, disability), who may be more vulnerable to sexual harassment.

Responsibilities of Executive Group Members:

The Executive Group is responsible for overseeing the overall effectiveness of the policy and ensuring alignment with organisational priorities. They will:

- Conduct regular reviews of internal data to identify areas of concern and ensure appropriate action is taken.
- Influence and shape the organisational culture surrounding sexual safety.
- Support the development of leadership strategies to effectively implement the policy.

Responsibilities of a Domestic Abuse and Sexual Violence Ally:

The role of a Domestic Abuse and Sexual Violence Ally is to provide trauma-informed support. They will:

- Offer empathetic and informed support to employees experiencing sexual misconduct.
- Educate colleagues on the policy, reporting procedures, and the available routes and outcomes.



- Assist with the reporting process and provide options for internal and external support.
- Maintain confidentiality, except where safeguarding concerns must be reported.

This comprehensive approach ensures a culture of respect, safety, and accountability within Gian Healthcare Ltd, where all employees can work free from fear of misconduct and harassment.

Related Policies

Adult Safeguarding

Confidentiality

Information Governance

Data Protection

Lone working

Grievance

Disciplinary

Complaint

Related Guidance

Equality Act 2010: Protection Against Discrimination and Harassment

<https://www.gov.uk/guidance/equality-act-2010-guidance>

The Sexual Offences Act 2003

<https://www.legislation.gov.uk/ukpga/2003/42/contents/enacted>

The Worker Protection (Amendment of Equality Act 2010) Act 2023

<https://www.legislation.gov.uk/ukpga/2023/51/contents>

Health and Safety at Work Act 1974

<https://www.legislation.gov.uk/ukpga/1974/37/contents/enacted>

Protection from Harassment Act 1997

<https://www.legislation.gov.uk/ukpga/1997/40/contents/enacted>

The Data Protection Act 2018

<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>



Workplace Regulations and Codes of Practice/ Sexual Harrasment (Acas Code of Practice)

<https://www.acas.org.uk/sexual-harassment>

Acas urges employers to act now on sexual harassment

<https://www.acas.org.uk/acas-urges-employers-to-act-now-on-sexual-harassment>

Training Statement

All staff, during induction, are made aware of the organisation's policies and procedures, all of which are used for training updates. All policies and procedures are reviewed and amended where necessary and staff are made aware of any changes. Observations are undertaken to check skills and competencies. Various methods of training are used including one to one, online, workbook, group meetings, individual supervisions and external courses are sourced as required.