KEYS Academy Trust

"Unlocking the Future"

TKAT Preventing Sexual Harassment at Work Policy

Policy Level and Description:	1	TKAT Statutory Policy NO CHANGES TO THE CORE TEXT ALL Schools require a policy on this topic/area. Only changes to highlighted sections are allowed to the core text – changes will be limited to school name and very limited school-specific details - LGBs to adopt, implement and monitor this policy.	
Reviewed by: ***(Trust Officer)***	Hester Wooller CEO	**Reviewed by:** ***(School representative)***	(name, role)
Approved by: ***(Trust Committee/Trust Board)***	FAPPP	**Approved by:** ***(LGB/LGB Committee)***	
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Version	DATE	DESCRIPTION
1	Nov 2024	New policy
2	Nov 2025	Included BJ updates

We are a family of distinctive schools at the heart of the diverse communities we serve.
In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.

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1 Introduction

1.1 The Keys Academy Trust (TKAT) 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 staff 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.

1.2 Sexual harassment can have very serious consequences for individuals and TKAT, including loss of morale; poor work performance; impact on wellbeing, and ill health; increased turnover of staff; legal claims; and damage to our reputation.

1.3 Building on the good work already being undertaken in TKAT in relation to low level concerns, we 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 disciplinary procedure. 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).

1.4 Whilst any action in response to conduct amounting to sexual harassment will depend on the facts and circumstances, TKAT is committed to taking and enforcing a zero-tolerance approach to sexual harassment towards its staff.

1.5 Any report of sexual harassment, including that carried out by third parties, as well as staff of TKAT will be initially dealt with in accordance with this policy.

1.6 TKAT 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 staff at all levels of TKAT are required to cooperate with any investigation of sexual harassment. On receipt, we 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.

2 Scope and purpose of this policy

2.1 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, business 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.

2.2 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.

2.3 This policy sets out a framework for line managers to deal with sexual harassment and it applies to:

2.3.1 All staff, including employees, irrespective of seniority, service, working hours, or type of contract of employment (permanent, fixed term or temporary); consultants; apprentices; volunteers; those undertaking work experience; agency workers.

2.3.2 Third parties interacting with those listed in section **Error! Reference source not found.**, such as pupils, parents, suppliers or visitors to the premises.

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

2.5 The board of Trustees has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the CEO/headteacher/head of school. Suggestions for change should be reported to the CEO.

2.6 You can refer any questions about this policy to your line manager in the first instance. Alternatively, you may refer questions about the operation of this policy and/or any particular concerns to the headteacher/head of school.

3 Unwanted conduct: what is sexual harassment?

3.1 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.

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

3.2.1 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.

(d) Sexual gestures.

3.2.2 Sexual comments, stories or jokes.

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

3.2.4 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.

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

3.2.6 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.

3.2.7 Initiating or spreading sexual rumours about a person.

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

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

3.2.10 Wolf whistling and catcalling.

3.2.11 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.

3.3 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.

3.4 TKAT 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.

4 Purpose of effect of unwanted conduct

4.1 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.

4.2 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.

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

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

4.5 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.

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

5 Active prevention of sexual harassment

5.1 TKAT recognises that employers are required by law to take reasonable steps to prevent sexual harassment of employees in the course of their employment. TKAT 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:

5.1.1 Ensuring that the preventing sexual harassment at work policy is in place, regularly reviewed, and well communicated to all. including

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

5.1.3 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, performance meetings and exit interviews.

5.1.4 Providing training to line managers on how to handle a sexual harassment complaint.

5.1.5 Ensuring all members of staff 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.

5.1.6 Annual mandatory anti-sexual-harassment training for all, including acceptable/non-acceptable conduct.]

5.1.7 Operating a zero-tolerance workplace culture in relation to sexual harassment.

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

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

5.2 TKAT will ensure that, amongst its staff, reasonable steps will be taken to prevent sexual harassment and pre-emptively educate via:

5.2.1 Inductions and contracts of employment and engagement.

5.2.2 Annual mandatory anti-sexual-harassment training for all staff.

5.2.3 Ensuring this policy is readily available and accessible to all staff.

5.2.4 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.

5.3 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.

5.4 The decision to inform the police will be the employee's, unless TKAT 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 the school. The LADO will follow their own procedures in considering what other agencies, if any, to inform. A decision to inform the LADO and/or police of a report of sexual harassment will not be taken lightly and we will seek the employee's cooperation in advance of doing so, where possible. If the LADO/police do become involved, TKAT 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.

6 Third parties

6.1 The school/trust will make third parties aware of this policy and ensure that it is readily available and accessible to all.

6.2 This policy makes clear that TKAT will not tolerate sexual harassment of its staff, and sets out the actions that we may take if a third party sexually harasses a staff member, 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 TKAT; 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 **Error! Reference source not found.** of this policy for further detail) or sharing the information in line with any statutory or regulatory duty.

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

6.3.1 Putting up signs [in our workplaces] [on our work sites] setting out acceptable and unacceptable behaviour.

6.3.2 Including a term in all contracts with third parties notifying them of the [school/academy/trust]'s policy on sexual harassment and requiring them to adhere to it.

7 Reporting sexual harassment

7.1 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 CEO

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

- Speaking with your headteacher/head of school
- Speaking with a member of the HR team
- Speaking with the chair of your school's local governing body (LGB)

7.3 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.

7.4 The listener should guide the individual making the report to review sections **Error! Reference source not found.** and **Error! Reference source not found.** of this policy. This will help them understand the available options and decide on the appropriate course of action regarding the matters disclosed.

7.5 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

7.6 Staff 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:

7.6.1 Intervening, where you feel able to do so.

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

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

7.6.4 Co-operating in any investigation into the incident.

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

8 Informal steps to address reported concerns of sexual harassment

8.1 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.

8.2 This direct approach is not an expectation of TKAT, 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 staff member advocating for you.

8.3 If informal steps have not been successful, are not possible or are not appropriate, you can raise a formal concern following the procedure detailed in section 9. You can also raise a formal concern if you want to report sexual harassment as a witness.

9 Raising a formal concern of sexual harassment

9.1 If you wish to formally report a concern about sexual harassment, you should inform the [headteacher/head of school, 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 the Executive Headteacher/CEO who will record your reported concern in writing for the investigation process.

9.2 Once you have formally reported your concern, it will remain confidential between you and the headteacher/head of school or executive headteacher/CEO, until you decide how you want to progress the matter and whether you want the reported concern to progress to a formal investigation.

9.3 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 staff, 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 the school//trust 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.

10 Formal investigations

10.1 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.

10.2 We will investigate reports of sexual harassment in a timely, respectful and confidential manner. Individuals not involved in the report or the investigation should not be told about it. Wherever possible, 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 the school/trust 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.

10.3 TKAT 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.

10.4 We will arrange a meeting with you, usually within 10 working days of receiving your report, 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. The investigator will arrange further meetings with you, as appropriate, throughout the investigation.

10.5 Please refer to clause **Error! Reference source not found.** regarding the use of an initial fact-finding document for this purpose. As far as it is reasonably possible to do so, you 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 the headteacher/head of school or executive headteacher/CEO will liaise with them to see if they can provide you with an update on the timescales for the investigation process.

10.6 Where your report is about an employee, we may need to consider whether suspension of the alleged harasser is necessary on full pay, 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 the school/trust decides to 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.

10.7 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 10.1.

10.8 You, 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 you or they have been

authorised to do so. Confidentiality during the investigation is very important and any breach of confidentiality may lead to disciplinary action.

10.9 Where your report is about someone other than an employee, such as a third party, e.g., a [contractor, parent, visitor, agency staff] 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 school/trust and the rights of that person. Where appropriate, we will discuss the matter with the third party.

10.10 We will also consider any request that you may make for temporary changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties, location of work or working hours.

10.11 At the end of the investigation, the investigator will submit a report to the headteacher/head of school/executive headteacher/CEO who is nominated to consider the outcome of the investigation and to consider further action required, as appropriate.

10.12 They will arrange a meeting with you, usually within one week of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting.

11 Action following the investigation

11.1 If the headteacher/head of school/executive headteacher/CEO 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.

11.2 Where the alleged harasser is an employee, the matter may be dealt with as a case of potential misconduct or gross misconduct under our disciplinary procedure.

11.3 Where the alleged harasser resigns part way through an investigation or following the investigation, the school/trust 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 five outcomes under KCSIE. In any event, headteacher/head of school /executive headteacher/CEO will arrange a meeting with the person who has reported the concerns to provide an update and to discuss next steps.

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

11.5 Whether or not your report of sexual harassment is upheld, and where the alleged harasser has not been dismissed because of the reported concern, we will consider how best to manage any ongoing working relationship between you and the person 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.

11.6 You will not be disciplined or treated detrimentally merely because you have reported a concern of sexual harassment, or if your reported concern was not upheld. If there is evidence that shows or indicates that a staff member has deliberately provided false information, or has acted dishonestly as part of an investigation, they may be subject to action under our disciplinary procedure which could result in dismissal.

12 Appeals

12.1 If the person reporting the concern is not satisfied with the outcome of an investigation they may appeal in writing to the local governing body/board of trustees, stating their full grounds of appeal, within [five working days] of the date on which the decision was sent or given to you.

12.2 We will endeavour to hold an appeal meeting, normally within 5 working days of receiving your written appeal. The appeal hearing will be conducted by a more senior manager/a committee of the local governing body/a committee of the board of trustees not previously involved in the case (although they may ask anyone previously involved to be present). You may bring a colleague or trade union representative to the appeal meeting.

12.3 The appeal hearing will not be a rehearing 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.

12.4 We will confirm our decision on your appeal in writing, usually within five working days of the appeal hearing. This is the end of the internal procedure, and there is no further right of appeal.

13 Protection and support for those involved

13.1 A staff member 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. 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 **Error! Reference source not found.**.

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

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

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

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

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

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

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

13.3.1 Unreasonably denying their requests at work, for example annual leave requests.

13.3.2 Unreasonably denying them opportunities at work, for example promotions.

13.3.3 Bullying behaviour such as intimidation, mockery, being rude and/or dismissive.

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

13.3.5 Unfairly dismissing them.

13.4 If you believe you have suffered any such treatment you should inform the headteacher/head of school. If the matter is not remedied to your satisfaction, you can raise it formally using the channel outlined within section **Error! Reference source not found.** of this policy, or via the grievance procedure if you wish.

13.5 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 our disciplinary procedure.

13.6 If a report is made about your behaviour or conduct, it is important not to automatically dismiss it on the grounds that you were 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. You 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 as you understand the conduct and/or behaviour was unwanted, you will be careful in future not to behave in a way that may cause offence.

13.7 We 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 the HR Manager.

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

13.8.1 The Equality Advisory and Support Service (www.equalityadvisoryservice.com).

13.8.2 Protect (www.protect-advice.org.uk).

13.8.3 Victim support (www.victimsupport.org.uk).

13.8.4 Rape crisis (www.rapecrisis.org.uk).

13.8.5 Rights of Women (England and Wales) (www.rightsofwomen.org.uk).

13.8.6 ACAS (www.acas.org.uk).

13.8.7 Equality and Human Rights Commission (www.equalityhumanrights.com).

13.8.8 Education Support helpline - free and confidential emotional support for teachers and education staff - www.educationsupport.org.uk.

14 Training

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

15 Confidentiality and data protection

15.1 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 being 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.

15.2 As part of the application of this policy, the school/trust 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 staff privacy notice, our retention and destruction policy, 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.

15.3 As previously stated at paragraph **Error! Reference source not found.**, a breach of confidentiality may give rise to disciplinary action under our disciplinary policy and procedure.

16 Review of this policy

This policy is reviewed and amended annually by the board of trustees. 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:

16.1 Providing refresher training to line managers.

16.2 Providing refresher training to all staff.

16.3 Conducting anonymous staff surveys for feedback on this policy and its implementation.

16.4 Updating this policy in accordance with changes in the law, regulatory requirements, and best practice.