



Sexual Safety Policy

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Equality Analysis	Completed 7 October 2024
Linked procedural	Dignity at Work Policy
documents	Disciplinary Policy
	Freedom to Speak Up Policy
	Allegations Against Staff Policy
Dissemination requirements	All Trust employees by intranet
Part of Trust's publication	Yes
scheme	

The East of England Ambulance Service NHS Trust (EEAST) has made every effort to ensure this policy does not have the effect of unlawful discrimination on the grounds of the protected characteristics of age, disability, gender reassignment, race, religion/belief, gender, sexual orientation, marriage/civil partnership, pregnancy/maternity. The Trust will not tolerate unfair discrimination on the basis of spent criminal convictions, Trade Union membership or non-membership. In addition, the Trust will have due regard to advancing equality of opportunity between people from different groups and foster good relations between people from different groups.

All Trust policies can be provided in alternative formats.



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Policy review



1. Introduction

- 1.1 We at EEAST recognise the right of every employee to feel safe from sexual harassment and we are committed to promoting a working environment where you never feel uncomfortable, frightened or intimidated in a sexual way.
- 1.2 EEAST has signed the 'Sexual Safety in Healthcare Organisational Charter', and we adopt a zero-tolerance approach to any unwanted, inappropriate and/or harmful sexual behaviours towards our workforce.
- 1.3 As part of this commitment, we expect you and every one of our people to take personal responsibility for observing, upholding, promoting and applying this policy.

2. Purpose

- 2.1 This policy aims to:
 - set out our zero-tolerance stance on all forms of sexual harassment and/or harm in the workplace,
 - prevent, respond to and take action to effect long-term change to a culture free from harassment, which supports dignity and respect for all,
 - remove barriers to speaking up and provide appropriate support for those affected,
 - encourage you to report all incidents of sexual harassment and/or harm,
 - encourage all bystanders to take action to help create a culture of safety for all employees.
- 2.2 This policy should be read together with other relevant Trust policies, e.g., the Dignity at Work Policy, Freedom to Speak Up Policy, Equality, Diversity and Inclusion Policy.

3. Scope

3.1 This policy applies to all EEAST employees, Casual Workers, Agency Workers, volunteers, students, job applicants and visitors undertaking work for, or on behalf of, EEAST.

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4. Duties

- 4.1 **All Employees / workers** are responsible for:
 - always treating colleagues, casual workers, agency workers, contractors, service users and all other individuals that they interact with in the course of their duties, with dignity and respect,
 - upholding EEAST's values at all times,
 - ensuring they understand what sexual harassment is,
 - being aware of how their behaviour may affect others,
 - challenging unacceptable behaviour wherever possible and provided it is safe to do so,
 - reporting all incidents of sexual harassment when witnessed and/or supporting recipients of sexual harassment in reporting their experience,
 - cooperating in investigations into alleged sexual harassment.
- 4.2 **Managers** are responsible for all duties at Section 4.1, and the additional responsibilities to:
 - role model acceptable behaviour in the workplace at all times,
 - always challenge any unacceptable or questionable behaviour that they witness or become aware of,
 - be aware of behaviour and language that can cause offence, including jokes and banter, and ensure standards are maintained in the workplace,
 - respond swiftly, sensitively and objectively to all complaints and concerns of sexual harassment in accordance with this policy.
- 4.3 Individuals where there is a power imbalance (i.e., line managers, mentors to students, qualified employees to students, long serving employees to new starters, senior employees to junior employees, employees in a majority group to those in a minority group, EEAST staff to patients and members of the public) are responsible for:
 - being aware of the potential power imbalance and the vulnerability this could place someone with a lower power at,

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- never taking advantage of their position of power, such as asking for sexual favours in return for enhancements in the workplace,
- being aware of vulnerabilities of minority groups who may be at greater risk of sexual harassment. This includes someone with protected characteristics (such as but not limited to gender, race, sexuality, trans status, religion and disability) which may increase the risk of experiencing sexual harassment / intersectional harassment (see Section 5).
- 4.4 **People Services (HR) representatives** are responsible for:
 - ensuring that every report is managed compassionately, and support is provided to everyone involved,
 - liaising with the Safeguarding Team where there is a concern that an allegation or concern may result in a transferable risk to our patients. This could include, for example, the misuse of a position of trust, predatory behaviours, etc.
 - regularly reviewing data and report any trends or areas of concern to senior management.
- 4.5 **HR and trade union representatives** are responsible for providing advice and guidance to employees around the application of this policy, including current legislation.

5. Language and terminology

- 5.1 Zero tolerance defines EEAST's absolute commitment to not tolerate any form of sexual harassment and/or harm, and to commit to creating a culture of sexual safety where all our people feel safe from sexual harassment in the workplace.
- 5.2 The following definitions are based on the Association of Ambulance Chief Executives '*Reducing misogyny and improving sexual safety in the ambulance service: what we know'* (October 2023):

Sexual safety	Refers to being and feeling psychologically and physically safe, including free of, and feeling safe from, behaviour of a sexual nature that is unwanted, or makes another person feel				
	uncomfortable, afraid, or unsafe.				



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Sexual assault	An act that a person did not consent to or is forced into against their will. It is a form of sexual violence and includes rape or other sexual offences such as groping, forced kisses.
Sexual harassment	Occurs when a person engages in unwanted conduct of a sexual nature that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them, whether it was intended or not.
Sexual misconduct	Describes a range of behaviours including sexual assault, sexual harassment, stalking, voyeurism, and any other conduct of a sexual nature that is non-consensual or has the purpose or effect of threatening, intimidating, undermining, humiliating, or coercing a person.
Sexual violence	Encompasses acts that range from verbal harassment to forced penetration, and an array of types of coercion, from social pressure and intimidation to physical force.
Affected person(s)	Someone who has been directly involved in or witnessed sexualised behaviour or activity that was carried out by another individual. The 'affected' person could be affected physically or psychologically at the time of incident and in the future.
Unwanted conduct	Conduct that is "unwelcome" or "uninvited". Unwanted does not mean an employee must expressly object to the conduct before it is deemed to be unwanted. A serious one-off incident can amount to harassment.
Non recent experiences	Non-recent sexual harassment, sometimes called historical sexual harassment.
Active bystander / upstander	Someone who chooses to challenge unacceptable or threatening behaviour.
Passive bystander	Someone who witnesses biased behaviour but does nothing about it.



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Misandry	Dislike of, contempt for, or ingrained prejudice against men.
Misogyny	Dislike of, contempt for, or ingrained prejudice against women.
Misogynoir	Hatred towards Black women where race and gender both play roles in bias. The term was coined by Black feminist Moir Bailey in 2010.
Intersectional harassment	Where an individual has one or more protected characteristics such as, but not limited to, gender, race, sexuality, trans status, religion and disability which may intersect and overlap to increase the risk of experiencing sexual harassment.

5.3 Throughout this policy the terms sexual harm, sexual harassment and sexual safety incident may be used interchangeably however all refer to the range of inappropriate sexual behaviours set out above.

6. Who can experience sexual harassment

- 6.1 Sexual harassment can happen to anyone, regardless of sex, sexual orientation, gender identity or age. Individuals can be both a victim and a perpetrator of sexual harm. Every individual's experience is unique to them.
- 6.2 Sexual harassment can take many forms including verbal, written, physical non-verbal and visual, and could be experienced from anyone you meet because of your job. This includes, but is not limited to, a work colleague, manager, supervisor, individual in a position of power, patient or member of the public.
- 6.3 The effect of such behaviour and whether it is unwanted should be considered from the point of view of the affected person who feels harassed (the "recipient").
- 6.4 Any incident of sexual harassment can cause long lasting and significant distress.

7. Types of sexual harassment



7.1 Sexual harassment can be a one-off incident or an ongoing pattern of behaviour. It can happen in person (face-to-face) or in other ways, e.g., online through emails, social media or messaging tools.

7.2 Examples of sexual harassment include:

7.2.1 Verbal and written

- Comments of a sexual nature about someone's body, clothing, appearance, etc
- Making sexually offensive and/or explicit comments or jokes, including banter
- Excessive and unwelcomed flirting
- Spreading rumours about, discussing and/or joking about a person's sexual orientation / sex life
- Asking questions about someone's sex life
- Requests for sexual favours.

7.2.2 Physical

- Inappropriate and unwanted touching of someone, including hugging, stroking, massaging
- Purposely brushing up against someone
- Following a person, standing too close or blocking their movement
- Coercive and intimidating sexual contact.

7.2.3 Non-verbal

- Looking a person's body up and down
- Derogatory gestures or facial expressions of a sexual nature
- Whistling or sexual gesturing
- Masturbation or genital exposure.

7.2.4 Visual

• Displaying or sharing pornographic images or sexually suggestive objects, photographs, images, videos, or other sexual content



- Showing or sending someone sexually explicit, inappropriate or suggestive images, text messages, emails, MS Teams messages, etc
- Sharing personal and/or naked images of someone.
- 7.3 What someone might consider as joking, 'banter' or part of the workplace culture is still sexual harassment if it meets the language / terminology at **Section 5.**
- 7.4 Sexual harassment is usually directed at an individual, but sometimes there can be a culture of sexual harassment at work that is not specifically aimed at one person, e.g., sharing sexual images. You can still make a complaint of sexual harassment in this situation.

8. Where's the line?

8.1 Working in an emergency response service can be challenging and demanding. Often colleagues like a joke or banter to lighten the mood or build relationships, however something one colleague finds humorous can be humiliating or intimidating to others, whether intended or not.

It isn't enough for the person making the comments to not have meant anything by them. Comments, jokes or banter of a sexual nature may be viewed as sexual harassment.

- 8.2 It is necessary to recognise that colleagues will have different experiences, backgrounds, views, and feelings, and you must never use jokes, comments and/or banter at work that might be offensive to a colleague.
- 8.3 Unwelcome comments or jokes at work are not just 'a bit of banter'. Such comments can quickly create a hostile environment and may lead to investigation and formal procedures in accordance with our Dignity at Work and/or Disciplinary Policy.

9. If you have been sexually harassed at work

9.1 If you have experienced sexual harassment at work you are encouraged to let someone know as soon as possible. You should refer to Section 11 for the different ways you can raise a concern.



9.2 It can be a good idea to make a note of what has happened, including dates, times and names, including any witnesses. This can be especially helpful if you find talking about the experience particularly distressing.

We understand that sometimes you may make a complaint a long time after the incident took place, either way we will take your complaint seriously and handle it fairly and sensitively.

- 9.3 Both **Section 12** of this policy and our Dignity at Work Policy (which is available on the intranet), provides information on the procedure that we will follow following your disclosure. The Disciplinary Policy may also be applicable in some circumstances.
- 9.4 We recognise that you might want to talk to someone to get advice and support before deciding whether to make a sexual harassment complaint. This could be a colleague, manager, HR or trade union representative. You could also speak to our Wellbeing Team or a Freedom to Speak Up Guardian. Further information is available at **Appendix A**.

10. What to do if you witness sexual harm

- 10.1 If you witness sexual misconduct in the workplace, you must act by considering the following:
 - offer support to the affected person, and/or let them know that you feel that the behaviour you witnessed is unacceptable,
 - you are encouraged to report inappropriate behaviour including sexual safety incidents by speaking to your line manager, HR representative and/or a Freedom to Speak Up Guardian. See Section 11 for more information.

Before you report the behaviour, you should make sure that the person targeted is aware of and supports your intention to report it. If they do not, and you remain concerned, you can speak anonymously to the Freedom to Speak Up Guardian for advice and support (referring to our Freedom to Speak Up Policy for further information).

• challenge the behaviour by speaking to the person responsible either at the time or at an appropriate time and place, but only if you feel comfortable and it is safe to do so.

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10.2 Witnessing a sexual safety incident can be upsetting and distressing and it takes courage to report and/or challenge the behaviour. It is important for you to remember to care for your own health and get support where needed. Details of support services can be found in **Appendix A**.

11. How to let us know

11.1 There are a number of ways you can raise concerns following a sexual safety incident, and you can choose whichever feels most comfortable for you:



- 11.2 You do not have to raise a concern formally. Just speaking to someone may assist you in taking action or receiving support to help promptly resolve your concerns.
- 11.3 EEAST has a duty of care to act in accordance with the information disclosed and may commence an investigation following discussion with an HR representative and safeguarding lead. If this is the case, an investigation may proceed without your consent, but on an anonymous basis wherever possible. Each situation will be considered on a case-by-case basis, and a decision will be made following the actions taken at **Section 12** to **Section 14**.



You will be signposted to the right policy and additional support that you may need.

12. Receiving a sexual safety disclosure and support for the affected person

- 12.1 It can take great courage for someone to talk about a sexual safety incident that they have been affected by, and EEAST is committed to ensuring that all colleagues disclosing sexual safety incidents are listened to, validated and supported. All disclosures will be taken seriously and investigated consistently.
- 12.2 When receiving a disclosure of sexual harm, the manager, member of the safeguarding team, HR team, or any person receiving a disclosure should provide support, taking the following points into consideration:
 - Believe the affected person's distress. Allow them to express their level of distress in their words and trust in the investigation process.
 - Show active listening without judgement or disbelief. Providing a safe environment and offering support will facilitate an open discussion, build trust and improve reporting of future incidents.
 - **Remember that it's not their fault.** Reassure the affected person that they are not to blame and that disclosing the information is the right thing to do.
 - Recognise how tough it might have been for them to tell you. Going back over an experience is upsetting and painful, which is why it sometimes takes some people a long time to tell anyone. If they want to, allow the affected person to bring a work colleague with them when making the disclosure to ensure emotional and moral support.
 - **Remain confidential.** In cases of sexual harm, the affected person may still be at risk from their perpetrator. How information is shared and what actions are taken following the disclosure will need to be considered to keep them safe.
- 12.3 If you are a colleague who receives a sexual safety disclosure you must report the incident immediately to a manager and/or an HR representative.

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- 12.4 Managers and/or HR representatives who receive a sexual safety disclosure will:
 - take the appropriate action in accordance with our Dignity at Work Policy, Allegations Against Staff Policy and/or Disciplinary Policy,
 - notify the Safeguarding Team (where there is a concern regarding transferable risks),
 - consider whether any immediate action is required, such as redeployment or suspension. Where appropriate this will be considered in accordance with the Pre Action-Review Meeting Procedure, which is available on the intranet,
 - decide on next steps, such as an investigation.
- 12.5 Supporting an affected person of a sexual safety incident can be a daunting experience and you may be worried about saying or doing the wrong thing. The <u>Rape Crisis</u> website can be accessed for information, including some do's and don'ts, when supporting someone who has experienced any form of sexual violence or abuse. Further information is also available at **Appendix A**.
- 12.6 You may find it challenging and upsetting if you are providing support to an affected person. It is important for you to remember to care for your own health and to get support when needed. You can do this by speaking to your manager, an HR representative, or through the support services which are listed in **Appendix A**.

13. Support for alleged perpetrators

- 13.1 Being accused of conducting a sexual safety incident can be distressing for an individual and may cause challenges in their personal and professional life. A thorough and fair investigation into all allegations of sexual safety must be conducted through the relevant EEAST policy, and the alleged perpetrator will be treated with respect and dignity throughout the process.
- 13.2 If you have been accused of conducting a sexual safety incident you are also encouraged to care for your own health and wellbeing and get support where needed. Details of internal support services can be found at **Appendix A**.



If you have a union membership you are also encouraged to access support from your union representative.

14. Procedure for dealing with criminal conduct

- 14.1 Some forms of severe sexual harassment may meet a criminal threshold, e.g., sexual assault, stalking, indecent exposure, rape.
- 14.2 When any concern is reported which could potentially meet this threshold, the relevant manager and/or HR representative will act in accordance with **Section 12** including notifying the Safeguarding Team.
- 14.3 The Safeguarding Team will provide expert advice, including as set out in EEAST's Allegations Against Staff Policy. They will also consider a referral and/or seek advice from external partners such as the police, Local Authority Designated Officer (LADO).
- 14.4 Although EEAST will manage most sexual harassment allegations internally, severe sexual harassment may not be suited to internal resolution and such allegations should be reported to the police to be managed by the criminal justice system (CJS).
- 14.5 It is not EEAST's obligation to report such matters to the police on behalf of the affected person (recipient of the behaviour), however the relevant manager and/or HR representative will fully support the individual to do so where appropriate.

Support may include, but is not limited to, paid time off work to report allegations, and the support of a colleague or line manager to attend any meetings with the police if required.

14.6 The exception to **Section 14.5** would be allegations of sexual harm where there is a concern regarding transferrable risk, or it is in the public interest for the allegations to be reported to the police. Each situation will be considered on a case-by-case basis, and the Safeguarding Team will provide relevant advice and guidance.

15. Sexual harassment from service users, members of the public or third parties

15.1 EEAST is aware that, depending on their role, service users, members of the public and third parties may treat our employees inappropriately, including sexual harassment. Any instance of work-related sexual

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harassment should be reported in line with this policy regardless of who the alleged perpetrator is.

15.2 This will allow a manager to take actions as soon as possible using the appropriate Trust policy, for example Violence and Aggression Policy.

16. Professional bodies

- 16.1 If you are required to be registered with a professional body as a condition of your employment, e.g., HCPC, it is a contractual requirement that you must maintain your registration to continue employment with EEAST. You must also follow the code of conduct of your professional body, including self-referral where appropriate.
- 16.2 Where self-referral is appropriate and not carried out within a specified time frame, we will notify the appropriate professional body of incidents of inappropriate sexual behaviour that affect your ability to practice safely and effectively.
- 16.3 Your own responsibilities with regards to professional registrations will be detailed in the professional body's standards.

17. Incidents unrelated to work

- 17.1 If you have been affected by a sexual safety incident, including domestic violence, that is not connected to work, the reporting process in this policy is not likely to apply. However, the impact of the incident might affect you at work. If you need support, you can speak to your manager or a person of trust.
- 17.2 **Appendix A** provides information about support, including specialist organisations you can contact to get help.

18. Protection from victimisation

- 18.1 EEAST does not tolerate harassment or victimisation of anyone raising a concern, nor will EEAST tolerate any attempt to bully a colleague into not raising a concern(s). EEAST will uphold its duty of care to ensure colleagues are fully supported when raising a concern.
- 18.2 Retaliation and victimisation of an individual raising a concern or acting as a witness will be addressed appropriately and may result in further action being taken under the appropriate EEAST policy, e.g., Disciplinary.

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19. Policy review

19.1 This policy will initially be reviewed after one year, and then on a three yearly basis, or amended in the light of new employment legislation and/or relevant case law.



Appendix A

Further information and support services

Internal Support Services

We offer a wide variety of support services which you can use if you have been a victim of, witnessed, or been accused of a sexual safety incident.

- The Wellbeing Team are always here for you and can offer a range of support. You can email the team at <u>wellbeing@eastamb.nhs.uk</u> or refer to the <u>Wellbeing</u> section of East24 for the latest updates.
- Employee Assistance Programme (Tel: 0808 196 2374) provides in the moment advice and support.
- TASC <u>Crisis Support</u> (Tel: 0300 373 0898) are there if you are experiencing suicidal thoughts, or you don't know what to do or who to turn to. You can contact them day or night, all year round.
- EEAST's local <u>Wellbeing champions</u> are trained staff who provide someone for you to talk to when you need it.

External Support Services

There is a wide range of external support if you have been the victim of a sexual safety incident.

- <u>Rape Crisis</u> have 38 rape crisis centres in England and Wales who have specialist services for women affected by sexual violence and abuse. Some also provide services for men. You can call them on 0808 500 2222.
- <u>SurvivorsUK</u> support male and non-binary survivors of sexual violence, providing counselling and practical help. They run an online helpline a webchat and SMS service. You can send a text to 020 3322 1860.
- <u>Galop the LGBT+ anti-abuse charity</u> have experience in supporting LGBT+ people who are victims of sexual violence, hate crime and other forms of abuse. You can contact them on their national helpline 0800 999 5428.
- <u>Get help Victim Support</u> can help if you have been affected by crime. You can call their support line 0808 1689 111, 24/7 or visit their website for other methods of support.



- <u>Help after rape and sexual assault NHS</u> provides details on Sexual Assault Referral Centres (SARCs) who can offer medical, practical and emotional support to anyone who has been raped, sexually assaulted or abused. SARCs have specially trained doctors, nurses and support workers.
- Health & Care Professions Council (HCPC): sexual safety hub provides help and guidance about making a report to them.
- <u>Sexual abuse support</u> <u>Sexual abuse support</u>: A Government website which provides a list of support services for victims of sexual violence and abuse.
- <u>Samaritans</u> provide support for anyone who is struggling to cope, and who needs someone to listen to without judgement or pressure.



Appendix B

Equality Impact Assessment

EIA Cover Sheet						
Name of process/policy	Sexual Safety Policy					
Is the process new or existing? If existing, state policy reference number	New (POL155)					
Person responsible for process/policy	HR					
Directorate and department/section	People Services					
Name of assessment lead or EIA assessment team members	HR Policy Subgroup					
Has consultation taken place? Was consultation internal or external? (please state below):	Internal consultation through HR Policy Subgroup members					
The assessment is being made on:	GuidelinesWritten policy involving staff and patientsXStrategyChanges in practiceDepartment changesProject planAction planOther (please state) Written to comply with an amendment to the Equality Act in line with the Worker Protection (Amendment of Equality Act 2010) Act 2023.					



Equality Analysis

		- 4				
What is the aim of the policy/procedure/practice/event?						
				erance stance on all forms of so		
			-	e, prevent, respond to and take a		
	-	-		ee from harassment, which sup	-	
	-			rriers to speaking up and pro		
				ncourage staff to report all incient ncourage all bystanders to take a		
		ulture of safety for			ction	
		icy/procedure/prac				
	ic poi	ley/procedure/prac				
Race	\boxtimes	Religion/belief	\boxtimes	Marriage/Civil Partnership	\boxtimes	
Gender	\boxtimes	Disability	\boxtimes	Sexual orientation	\boxtimes	
Age	\times	Gender re-	\times	Pregnancy/maternity	\mathbf{X}	
		assignment				
Who is resp	onsibl	e for monitoring the	e poli	cy/procedure/practice/event? H	R	
What inforn	nation	is currently availab	le on	the impact of this		
		practice/event?				
	-			kual safety concerns are recorde		
		-		itored accordingly. The policy ha		
			-	ess, no negative impact was rais	ed,	
		ence available ther		n make an assessment about this		
-		practice/event? N		in make an assessment about this	1	
policy/proce	Luurcy		0			
Do you have any examples that show that this policy/procedure/practice/event						
is having a p	ositive	e impact on any of t	he fo	llowing protected characteristics	?	
Yes/No, if yes please provide evidence/examples:						
Race		Religion/belief		Marriage/Civil Partnership		
Gender		Disability		Sexual orientation		
Age		Gender re-		Pregnancy/maternity		
-0-		assignment				
		0				
Please provi	de evi	dence:				



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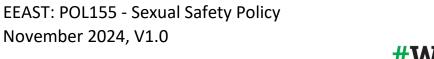
	This is a new policy that has been written to comply with the amendment to the Equality Act 2010 and to be inclusive of all our workers.					
Are there any concerns that this policy/procedure/practice/event could have a negative impact on any of the following characteristics? Yes/No, if so, please provide evidence/examples: No						
Race Gender Age		Religion/belief Disability Gender re- assignment		Marriage/Civil Partnership Sexual orientation Pregnancy/maternity		
Having revie process, no	Please provide evidence: Having reviewed and updated the policy and completed a full consultation process, no negative impact was raised, and with the evidence available there is no negative impact.					
Action Plan, Specific	/Plans	s – SMART				
Measurable Achievable						
Relevant						
T ime Limite	d					

Evaluation Monitoring Plan/how will this be monitored? Who – see Monitoring Table

How

Ву

Reported to





Appendix C - Monitoring Table

What	Who	How	Frequency	Evidence	Reporting arrange-	Acting on recommen-	Change in practice and lessons to be
					ments	dations	shared
Audit of employee experience and outcomes to ensure that the policy and procedure is being applied consistently, fairly and accurately for all.	Head of Employee Relations / Business Partnering	Monitor ER Tracker data / FTSU data.	Monthly / annually, or as reported	ER tracker data / FTSU reports	Reported to and discussed at People Committee / Trust board where required.	Head of ER and HR People Partnering will address any actions or changes required.	 Any change in practice will be identified and: process updated with ER Team and HR People Partnering team ER leads / HRBP / line manager training implemented policy updated where required.

