



EAST HERTS COUNCIL

Bullying and Harassment Policy

Policy Statement

Policy Statement No. 17

February 2021 (issue 4)

Updated: October 2024 (issue 5)

Contents

EAST HERTS COUNCIL.....	<u>14</u>
Policy Statement.....	<u>14</u>
1.0 Introduction.....	<u>33</u>
2.0 PURPOSE AND SCOPE	<u>43</u>
3.0 HARASSMENT & BULLYING – DEFINITIONS AND FORMS	<u>54</u>
3.1 Harassment.....	<u>54</u>
3.2 Bullying.....	<u>75</u>
3.3 Forms of Harassment and Bullying.....	<u>85</u>
4.0 GENERAL PRINCIPLES.....	<u>107</u>
5.0 RESPONSIBILITIES UNDER THE POLICY.....	<u>128</u>
6.0 MAKING A COMPLAINT	<u>149</u>
7.0 INFORMAL PROCEDURE.....	<u>1510</u>
8.0 FORMAL PROCEDURE.....	<u>1612</u>
9.0 HARASSMENT/BULLYING BY CONTRACTORS, AGENCY STAFF, SERVICE USERS OR OTHER GROUPS	<u>1914</u>
10.0 HARASSMENT/BULLYING BY ELECTED MEMBERS	<u>2116</u>
11.0 APPEALS TO STAGE 2 GRIEVANCES FROM THIS PROCEDURE <u>2217</u>	
12.0 REVIEW.....	<u>Error! Bookmark not defined.</u> <u>17</u>
12.1 This procedure will be reviewed if there are any changes in legislation or best practice requiring amendments to be made. <u>2317</u>	

1.0 Introduction

1.1 East Herts Council is committed to the elimination of bullying, harassment and discrimination and encourages all staff to act in accordance with the code of conduct, this updated policy is intended to address complaints on the grounds of protected characteristics under the Equality Act 2010 and include the new provisions in the Worker Protection Act (Amendment of Equality Act 2010) on bullying and harassment. The protected characteristics are:

1.2 Age

1.3 Disability

1.4 Gender reassignment

1.5 Marriage or civil partnership

1.6 Pregnancy and maternity

1.7 Race

1.8 Religion or belief

1.9 Sex

1.10 Sexual orientation

4.11.11 ~~East Herts Council is committed to the elimination of discrimination on the grounds of sex, marital status, sexual orientation, race, colour, nationality, gender reassignment, creed or religious belief, ethnic or national origins, age and disability.~~ It is the right of every member of staff to work without fear of ~~discrimination, harassment~~ discrimination, harassment, or victimisation. The council recognises the problems associated with bullying and harassment and is committed to providing an environment in which all individuals can operate effectively, ~~confidently~~ confidently, and competently.

4.21.12 ~~We welcome All the staff at East Herts Council the support of staff~~ will support in seeking to eradicate harassment and bullying in the workplace, or outside work if it has a bearing on the working relationship.

~~4.31.13~~ Where unacceptable behaviour occurs within the scope of this policy, an appropriate investigation will be conducted, which could lead to informal resolution or disciplinary action as outlined in the *Disciplinary Policy*, which may include dismissal. ~~disciplinary action will be taken which may include dismissal.~~ The council treats serious cases of harassment or bullying as gross misconduct very seriously.

~~1.4—This procedure does not form part of any individual employee's contract of employment with East Herts Council.~~

2.0 PURPOSE AND SCOPE

2.1 The purpose of this policy ~~and~~ procedure is to provide a procedure under which staff who consider they are victims of harassment or bullying can seek action which is non-threatening to them and quickly ends the problem. It will discuss examples of what constitutes bullying and harassment, but it is not an exhaustive list. ~~It~~ is intended to give confidence to those who might be afraid to seek a solution to the problem due to fear of reprisal or ridicule and to put into practical application the council's firm commitment to the elimination of harassment and bullying.

2.2 -This policy is an specialised amended version of the council's *Grievance Policy*. Any formal actions to investigate an employee's complaint taken within the scope of this Procedure policy will count as be dealt with as grievances, grievance hearings and grievance decisions.

- 2.3 This procedure policy will not cover circumstances where an employee has been dismissed under the ~~Councils~~ Council's Disciplinary Procedure, in which case the Disciplinary (Appeals) Procedure will apply.
- 2.4 This policy applies to all employees except for Chief Officer level or any other nominated statutory posts. For these postholders the principals will apply, however reference should be made to the separate nationally agreed terms and conditions, for policy and procedural guidance.
- 2.5 This policy was reviewed in October 2024 to include active provisions from ~~the Worker Protection (Amendment of Equality Act 2010) Act 2023~~ Worker Protection Act (2024) ~~a change to the law made by the Worker Protection Act (Amendment of Equality Act 2010) , which will have effect from 26 October 2024.~~ An amendment to the existing Equality Act 2010 Section 40A aims to protect against sexual harassment of East Herts Council sStaff.

3.0 HARASSMENT & BULLYING – DEFINITIONS AND FORMS

3.1 Harassment

3.1.1 The current definition of harassment as set out in the Equality Act 2010 is ~~“~~unwanted conduct or sexual conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating ~~and an~~ intimidating, hostile, degrading, humiliating or offensive environment for that individual and because of rejection or submission to the conduct the individual is treated less

favourably than they would have been treated if they had not rejected or submitted to the conduct.". This includes harassment based on association or perception and by a third party.

There are three types of harassment set out in the Act:

3.1.1.1 Harassment related to protected characteristics

3.1.1.2 Sexual harassment (this does not need to be related to a protected characteristic)

3.1.1—

3.1.1.3 Less favourable treatment of a worker because they submit to, or reject, sexual harassment or harassment related to sex or gender reassignment.

3.1.2 The protected characteristics under the Equality Act 2010 include:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation

The law on harassment does not cover the protected characteristics of:

- Marriage or civil partnership
- Pregnancy and maternity

If someone experiences worse treatment because of having one of these protected characteristics, they might have experienced direct discrimination. Which is Misconduct under the *Disciplinary Policy*.

3.1.2 The protected characteristics are; age, disability, gender reassignment, race, religion, sex and sexual orientation.

3.1.3 In deciding whether conduct has the effect referred to in the definition, the following must be taken into consideration:

- (a) the perception of the individual
- (b) the circumstances of the case and workplace culture.
- (c) whether it is reasonable for the conduct to have that effect.

~~3.1.4 The scope has been extended to include harassment based on association or perception and by a third party.~~

~~3.1.5~~ 3.1.4 The essential characteristic of harassment is that the action(s) is unwanted by the recipient.

3.2 Bullying

3.2.1 Bullying is not specifically defined in law, however ACAS gives the following definition:

~~"Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient".~~ recipient".

“Unwanted behaviour from a person or group that is:

- Offensive, intimidating, malicious or insulting
- An abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone

And that, Bullying might be

- A regular pattern of behaviour or a one off incident
- Happen face to face, on social media, in emails or calls
- Happen at work or in other work related situations
- Not always be obvious or noticed by others

It's possible that someone might not know that their behaviour is bullying. It can still be bullying even if they do not realise it or do not intend to bully someone.”

3.2.2 Bullying is often inextricably linked to the areas of harassment described above. This policy will allow the investigation of both Bullying and Harassment. The HR officer will support the hearing manager to categorise the reported behaviours and actions appropriately.

3.2.2

3.3 Forms of Harassment and Bullying

3.3.1 Harassment and bullying can range from extremes such as violence, to less obvious forms such as ignoring or excluding someone. Forms include, but are not limited to:

- Inappropriate and unwelcome physical contact.
- Abusive, aggressive, threatening or insulting words and behaviour.
- Derogatory remarks or offensive language.
- Insensitive jokes or pranks.
- Gossip or slander.
- Spreading malicious rumours or making malicious allegations.
- Displaying or circulating or distributing offensive writing or literature or pictures or computer imagery.
- Posters, graffiti, badges, or other symbolic displays of offensive material.
- Requests for sexual favours.
- Speculation or innuendo about a person's private life and sexual activities.
- Obscene gestures.
- Unwelcome or unauthorised use of mobile phones to take pictures or video films or record conversations without agreement.
- Pressure to participate in political/religious groups.
- Isolation or non-cooperation.
- Exclusion from conversations or work or social activities.
- Criticising individuals unreasonably in front of others.
- Constantly devaluing effort and/or achievement.
- Blaming individuals for mistakes that are not their fault.
- Setting employees up to fail, for instance by setting unreasonable deadlines, changing work objectives without consultation, or withholding information necessary for the individual to do their job.
- Substituting responsible tasks with menial or trivial ones without justifiable cause.

This list is not exhaustive, ~~actions could be in person or~~; actions could be in person or using technology, online and the actions in question must be viewed in terms of the offence or distress they

cause the individual and the degree to which the offence caused is apparent to a reasonable person.

3.3.2 A professional management conversation concerning performance or behaviour where legitimate and constructive criticism is made (or a reasonable request/instruction given) may be difficult for an employee to hear (and therefore unwanted) but does not constitute bullying behaviour, providing such criticism or instruction is legitimate/reasonable.

3.3.3 Harassment and bullying can happen between any two parties, and they may involve one or more individuals directing their behaviour towards one or more individuals. A person can experience harassment even if they are not the intended "target." Additionally, even in cases where there isn't a clearly defined "target" of the behaviours or actions, individuals can still be affected by the harassing behaviour. Harassment and bullying can occur between any two parties, and may be directed by one or more individuals towards one or more individuals. A person may be harassed even if they were not the intended "target". They can be perpetrated by people at any level of the organisation against people at any other level - or at the same level - within the staffing structure.

3.3.3

4.0 GENERAL PRINCIPLES

4.1 If a complaint is brought to the attention of management, it will be investigated promptly ~~and appropriate action, and~~ appropriate action will be taken. All employees involved in an investigation are expected to respect the need for confidentiality.

4.1

4.2 Measures will be taken to ensure that employees are protected against victimisation for making or being involved in a complaint. The complaint will be handled confidentially, and ~~A~~ any action taken against an employee for ~~complaining~~ raising a complaint about harassment or bullying (except where the complaint is found to be false and malicious) will be investigated as a potential disciplinary offence as per the Disciplinary Policy.

4.3 The law says victimisation means 'suffering a detriment' because you've done or intend to do a 'protected act'. A 'protected act' means taking action related to discrimination law. This includes:

- making a complaint of discrimination or harassment
- supporting someone else's complaint
- gathering information that might lead to a complaint.
- acting as a witness in a complaint
- saying something or giving evidence that does not support someone else's complaint.

The law also protects a person from victimisation when someone else thinks the person has done or intends to do any of the things above.

'Detriment' means someone experiences one or both of the following:

- being treated worse than before
- having their situation made worse

4.4 Acting in good faith

The law only protects someone from victimisation if they've done something 'in good faith'. This means not acting maliciously.

Someone is not protected from victimisation if they:

- deliberately give false evidence
- 4.2• deliberately make a false allegation of discrimination or harassment

4.34.5 Where an employee makes a formal complaint under Section 8 of this procedure, the employee ~~should~~will be kept informed in general terms (usually by the investigating manager) of any decisions or actions taken, and/or any proposed future action with an indication of timescales.

4.44.6 Any allegations/complaints found to be false and malicious may result in disciplinary action being taken against the complainant.

5.0 RESPONSIBILITIES UNDER THE POLICY

5.1 Every East Herts Council employee is responsible for their own conduct within the terms of this policy. The aim of the policy is for East Herts Council to ~~to protect~~protect employees from harassment and bullying and to enable them, if necessary, to make a complaint or assist in an investigation without fear of reprisal or victimisation. The responsibility for ensuring that

this is achieved lies with the complainant themselves, the line manager and colleagues.

5.2 The complainant: We acknowledge that people who are harassed or bullied often feel vulnerable and isolated and believe it is best not to complain as their complaints will not be taken seriously. East Herts Council will treat all complaints very seriously ~~and we would strongly encourage anyone in this situation to take active measures to stop the~~, and we strongly encourage anyone in this situation to take active measures to stop bullying or harassment by using the informal and/or formal procedures set out below.

5.3 The manager: All East Herts managers have a duty to establish and maintain a working environment free from harassment and bullying and to challenge individuals who are involved in incidents when they occur. Any manager who receives a complaint of harassment or bullying, ~~or is witness to such behaviour, or witnesses such behaviour~~ must investigate the complaint or incident and ensure that the problem is resolved as quickly as possible. They may be able to intervene informally (with the consent of the victim/complainant) to resolve the problem, or where this is likely to be inadequate or inappropriate, they may need to take measures to invoke action - or support the victim/complainant in taking action - under the formal procedure set out in Section 8 below. Managers should seek advice from HR Officers if uncertain how to proceed with the complaint.

5.4 Colleagues: All employees must comply with this policy and take steps to ensure that bullying and harassment ~~does do~~ not occur. This includes not colluding in or ignoring harassment or bullying behaviour directed at others, and challenging it (or drawing it to the attention of an appropriate manager) if you think it is taking place. Any employee who receives a complaint of harassment or bullying must respect the confidentiality of both the complainant and the alleged perpetrator, and should encourage the complainant to consider using the informal and/or formal procedures set out below.

6.0 MAKING A COMPLAINT

6.1 ~~A member of staff who believes that~~Staff members who believe s/he is/they are being subject to harassment or bullying may, if they choose to, first use the informal procedures set out in Section 7 below. It is preferable for all concerned that complaints of harassment or bullying ~~are dealt with informally wherever possible since the intention is to prevent the harassment or bullying.~~be dealt with informally wherever possible. Informal action often enables quick, practical solutions while preserving ~~confidentiality and minimising embarrassment for the victim~~the complainant's confidentiality. However, where the complainant feels that the informal procedure is inappropriate or likely to prove ineffective, they may use the formal procedure described in Section 8 below.

6.2 Any employee being subjected to or witnessing any incident(s) of harassment or bullying should keep a written record

including the date, time, nature of incident(s), any correspondence relating to the incident(s), names of those involved and the names of any witnesses.

6.3 The Council's confidential [Employee Assistance Programme](#) is available to employees who feel they need ~~such~~ counselling support. [Unison also has support resources for its members to access.](#) Managers can refer employees, if appropriate, but it can also be accessed through self-referral and without approval from managers, Occupational Health or HR. The role of the counsellor is to provide support and assistance to the complainant during this stressful time. The role also extends to the alleged-~~perpetratorharasser~~, if requested. However, the same counsellor should not advise the ~~alleged~~ ~~alleged~~ ~~perpetratorharasser~~. The counsellor has no role in formal investigations, and neither are they a source of evidence in any ~~proceedings, since~~ ~~proceedings since~~ all discussions between counsellor and employee are confidential.

7.0 INFORMAL PROCEDURE

7.1 Some people are unaware that their behaviour in some circumstances -could be viewed as harassing or bullying. If it is clearly pointed out to them that their behaviour is unacceptable, the problem can sometimes be resolved.

7.2 Employees ~~that~~-~~who~~ feel comfortable doing so should raise the matter informally with the alleged perpetrator, stating which aspect of their behaviour is offensive and unacceptable, the effect it is having on them-~~and making it clear that it should~~

~~cease. This can be done either verbally or by means of, and making it clear that it should cease. This can be done either verbally or in~~ a written communication, a copy of which they should keep.

7.3 If the employee feels unable to do this, feels the situation cannot be resolved amicably, or has tried this and it has failed, ~~they~~ should approach any of the following for confidential advice/support and be encouraged to take appropriate steps:

- Line manager or another manager or a member of Human Resources
- A EHC colleague
- Trade Union representative (if employee is a member of a Union)

The colleague, ~~or TU representative, or Manager/manager~~ or HR Officer may accompany the employee to any discussion with the alleged perpetrator and facilitate a discussion to resolve matters.

7.4 HR should also be contacted by the complainant or the person supporting them. (if they have not been by the compliant complainant) ~~†This is to~~ provide advice and support over the informal stage to ensure matters are treated consistently and support is provided to both parties.

8.0 FORMAL PROCEDURE

8.1 A formal complaint can be made using East Herts Council formal Grievance Procedure. The employee should also copy their written grievance to the Head of Human Resources or, in their absence, the Human Resources Officer.

8.2 The formal procedure will apply where:

- ~~Where~~ the complainant feels that the informal stage is inappropriate or likely to prove ineffective.
- The informal procedure has proved ~~ineffective~~ ineffective, and the complainant wishes to make a formal complaint.
- The nature of the allegation is serious enough to warrant formal action from the outset.
- An allegation has been made by a “third party”, who witnessed an incident.
- It becomes apparent to the manager during ~~the an~~ informal ~~stage to the manager supporting this~~ stage that the ~~allegation is matters are~~ serious enough to warrant formal action.

8.3 HR will appoint an appropriate manager to investigate the complaint promptly and adequately. ~~The manager will be supported by an HR Officer~~ An HR Officer will support the manager. Human Resources may appoint a note-taker in addition to an HR Officer to support the investigator. In certain cases, East Herts Council may appoint an independent and/or expert investigator from outside the organisation.

8.4 The complainant may request extra support from management during the time that any complaint is being investigated, which may include a request to work separately from the alleged perpetrator. In considering such requests, management will conduct a risk and reasonableness assessment before deciding

on action designed to protect the employee from the risk of further harassment without unnecessary disruption to services.

- 8.5 Depending on the nature and severity of the allegations, the employee who is accused of harassment or bullying may be suspended on full pay whilst the circumstances of a serious complaint are being investigated, in accordance with the procedures for suspension set out in the council's *Disciplinary Procedure Policy*.
- 8.6 Investigation will be conducted with the aim of establishing the facts of the case. Where the complainant or any witness is interviewed as part of the investigation, they will have the option of being accompanied by a trade union representative or a work colleague of their choice. The alleged perpetrator will have the same option.
- 8.7 The investigatory process shall include a formal grievance hearing with the complainant under the terms of the ~~Council's~~ Council's Grievance Procedure (see Stage 6 of the Grievance Procedure).
- 8.8 All efforts should be made to conclude the investigation within ~~28 calendar~~ 10 working days of receiving the formal complaint. ~~If this time limit is exceeded, the complainant should be advised -days of receiving the formal complaint. If this time limit is exceeded, the complainant should be advised of this~~ and informed of a likely date when the investigation will end.
- 8.9 The investigator will prepare a report of the investigation. The investigator will conclude on the balance of probabilities whether the complaint should be upheld and referred to a disciplinary hearing or whether the perpetrator should be issued with an informal warning where there is only some

substance or the misconduct only warrants an informal warning, or they may determine there is no case to answer.

Where the matter is referred to a Disciplinary hearing, any disciplinary action will be conducted in accordance with the council's ~~disciplinary~~ Disciplinary Policy, with the additional specific provisions:

- The complainant, as well as the employee accused of harassment or bullying, will have the right to be accompanied at the hearing by a trade union representative (Union members only) or a work colleague.
- The severity of the disciplinary ~~penalty~~ sanction imposed upon an employee found ~~guilty to have harassed/bullied of~~ harassment will be consistent with those detailed in the disciplinary procedure (e.g. serious acts of harassment or bullying will normally result in summary dismissal). Where a lesser penalty ~~sanction~~ is considered appropriate, this may be coupled with action to ensure that the ~~complainant~~ victim is able to continue working without embarrassment or anxiety. This may include the transfer of the alleged ~~perpetrator~~ harasser to a different work area or department on a temporary or permanent basis, or the amendment of working practices to minimise contact between the two employees.

9.0 HARASSMENT/BULLYING BY CONTRACTORS, AGENCY STAFF, SERVICE USERS OR OTHER GROUPS

- 9.1 The Council has a responsibility under equality legislation to protect our staff from harassment by third parties (stakeholders and other external contacts). The ~~Council~~Council will take all reasonable actions in response to incidents of unacceptable behaviour towards employees.
- ~~Management~~When such incidences arise and are reported East Herts Council's Mmanagement will investigate~~s~~ reported incidents and take~~s~~ appropriate action.
- 9.2 Employees have a duty to report incidents of harassment by people who are not East Herts Council employees, ~~“(a Third Party)”~~. This should be done by advising their line manager of what happened ~~and by completing an Incident Report Form on the intranet, completing an Incident Report Form on the intranet,~~ and returning it to the Health & Safety Officer. HR will also be informed of the incident to ensure that any support is provided to meet the employee's needs.
- 9.3 In such circumstances, the employee may first choose to follow the informal procedure set out in Section 7 above.
- 9.4 However, when the complainant feels that the informal procedure is inappropriate or likely to prove ineffective, they should make a formal complaint to their line manager in writing. The line manager, with the support of HR, if necessary, will review the complaint and give guidance as to how to proceed either formally, informally or in mediation.
- 9.5 Upon receiving a formal complaint the line manager must inform his/her senior manager of the complaint, and investigate the complaint promptly and adequately. While the complaint is being investigated the line manager should instigate all reasonable measures (with the authority of the

senior manager if necessary) to protect the employee from the risk of further harassment.

- 9.6 If after the investigation, the immediate line manager (and their line manager if relevant) are satisfied that harassment has occurred, it will be the responsibility of the senior manager to instigate appropriate action - within the council's legal and constitutional powers and operational/financial capacities - to prevent the perpetrator from further harassing the complainant or any other member of staff.

-In some cases a warning to the perpetrator may be adjudged sufficient in the first instance, coupled with other practical action designed to protect the complainant from exposure to further acts of harassment. However, for serious cases, or where an initial warning has proved ineffective, such action may ultimately include:

- ~~Denying~~Denying further access to ~~EHC~~the council's premises or services by the visitor or agent of a contractor or consultant, or termination of the contract for services.

- 9.7 Whatever the initial or ultimate course of action decided upon in relation to the perpetrator, the line manager and the senior manager must, from the point of becoming aware of the harassment, take reasonable and appropriate action to prevent or minimise the potential for the complainant to be subjected to further acts of harassment.

10.0 HARASSMENT/BULLYING BY ELECTED MEMBERS

- 10.1 Any dealing between ~~m~~Members and ~~o~~Officers should be conducted with ~~–~~mutual trust, respect and courtesy. Further guidance is available in the ~~Council's~~council's Constitution and the Member/Officer Relations Protocol.

10.2 If an employee wishes to raise concerns about a ~~M~~member's behaviour towards them or another East Herts Council employee they should raise the complaint with the Monitoring Officer in accordance with the Constitution. This procedure policy will not apply in those circumstances and the matter will be managed by the Monitoring Officer (Head of Legal and Democratic Services).

10.3 Details of how to make such a complaint to the Monitoring Officer can be found here:
<https://www.eastherts.gov.uk/councillors-committees/complaints-about-councillors>

11.0 APPEALS TO STAGE 2 GRIEVANCES FROM THIS PROCEDURE

11.1 If the investigator decides that there is a disciplinary case to answer, neither party will have a right of appeal against this decision. There is a separate right of appeal regarding a sanction against an employee following a disciplinary hearing. Please see the Disciplinary Policy for further details.

11.2 If the manager decides ~~that~~ it is likely ~~that~~ there is some substance to the complaint/grievance but ~~that~~ the matter ~~cs~~hould be resolved through informal means, this will uphold the complaint and neither party will have a right to appeal against the decision.

11.3 If the manager decides ~~that~~ there is no case to answer, the complainant may appeal against the decision. Please see the *Grievance Policy* for further details.

12.0 Reasonable Prevention of Harassment.

12.1 East Herts Council is committed to eliminating discrimination based on ~~sex, marital status, sexual orientation, race, colour, nationality, gender reassignment, creed or religious belief, ethnic or national origins, age and disability~~ the protected characteristics. It is every staff member's right to work without fear of harassment or victimisation. A change to the law made by the Worker Protection Act (Amendment of Equality Act 2010), which will have effect from 26 October 2024, is October 2024's The Worker Protection Act (2024), an amendment to the existing Equality Act 2010 Section 40A, and introduces a proactive provision against sexual harassment, ~~and East, East~~ Herts Council is committed to adding to and strengthening its existing prevention provision.

12.2 As a proactive measure, East Herts Council will commit to reviewing its provision annually to ensure that it is fit for purpose. The ~~Council~~ Council will actively work with feedback and suggestions from Unison the Union and staff to improve the provision. Action plans and reporting figures will be included in Human Resources' Resource's' Annual Equalities Report submitted to the annual report to the Human Resourcing Committee, in the Annual Equalities Report. Due to the new duty, this will specifically highlight sexual harassment, but all types of harassment data is and staff to improve the provision. Action plans and reporting figures will be included in Human Resources' Annual Equalities Report, which will be submitted to the Human Resourcing Committee. Due to the new duty, this will specifically highlight sexual harassment, but all types of harassment data are included in the report.

12.3 The council's provision to actively prevent sexual and other types of harassment, as per The Equality Act 2010, will include, but is not limited to:

- Mandatory staff training and mandatory manager training on the Annual Training ~~Annual T~~ training calendar and eLearning system.

- Training for elected members.
- Ensuring appropriate reporting routes are maintained.
- Ensuring Support via the Employee Assistance Programme is available.
- Conducting internal and external risk assessments of ~~for~~ "Third-party parties."
- Implementing additional operational action plans based on risk assessments for high-risk environments where staff have prolonged contact with the public and/or contractors.

13.0 REVIEW

12.413.1 This ~~procedure-policy~~ will be reviewed if there are any changes in legislation or best practice requiring amendments to be made.

Pathway for Dealing with Complaints of Bullying and Harassment

