

# **Sexual Harassment Policy**

Approved by Directors: March 2025 Review date: March 2026

DIRECTOR LEAD Sam Thompson

#### **SCOPE**

This policy and procedures applies to all employees of eCAPH.

This applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, apprentices and volunteers. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

The policy also applies to sexual harassment by third parties.

The policy and procedures do not form part of any employee's contract of employment, and it may be amended at any time following consultation with the recognised trade unions.

## **POLICY STATEMENT**

The purpose of this policy and procedure is to set out eCAPH 's framework for dealing with any sexual harassment that occurs, whether by employees (including consultants, contractors, agency workers and volunteers) and also by third parties such as parents, suppliers or visitors to the school/academy.

With the introduction of the Worker Protection (Amendment of Equality Act 2010) Act 2023, from 26<sup>th</sup> October 2024 employers of any size in England, Wales and Scotland have a specific duty to take reasonable steps to prevent sexual harassment of workers in the course of their employment.

eCAPH is committed to having a culture that is diverse, equitable and inclusive, which is core to everything that the organisation strives to achieve and to the environment they wish to protect. One key to protecting the eCAPH culture and people is seeking to provide a working environment free from sexual harassment, ensuring all employees are treated, and treat others, with dignity and respect. eCAPH recognises that sexual harassment can occur both in and outside the workplace, such as on social functions, conference events or on social media.

Sexual harassment or victimisation of any employee, or anyone employees encounter during the course of their work, is unlawful and will not be tolerated. eCAPH will take active steps to help prevent the sexual harassment and victimisation of all employees. If an employee is a victim or witness of sexual harassment, they are encouraged to report it in accordance with this policy. This will enable eCAPH to take appropriate action and provide support.

Sexual harassment can place eCAPH and the perpetrator at risk of legal action, whether the perpetrator works for the federation or are a third party outside of the eCAPH 's control. Sexual harassment may also result in disciplinary action being taken, up to and including dismissal.

## What Employees Can Expect From eCAPH

## eCAPH will:

- Adopt a zero-tolerance approach to all forms of sexual harassment.
- Seek to ensure that the mental health and wellbeing of employees is always treated as a priority and
  ensure that they are supported if they are facing such issues.
- Ensure that everyone who works for eCAPH is aware of the values and behaviours and their responsibilities towards each other and understands the impact that their behaviour may have on colleagues.
- Monitor the workplace culture through exit interviews, one-to-one conversations and return-to-work meetings to identify and address any issues
- Undertake risk assessments to identify potential areas where sexual harassment could take place and
  to determine reasonable measures that can be implemented to minimise the risk of exposure to
  sexual harassment in the workplace, and by third parties that employees may have contact with.
- Treat all complaints promptly, efficiently and sensitively. The eCAPH will also maintain confidentiality subject to any safeguarding, regulatory or legal considerations.
- Provide protection against victimisation for anyone raising a complaint.
- Ensure that equality and anti-harassment training is available to all employees to enable them to deliver on behalf of the school/academy and that this is properly recorded.
- Ensure that the Directors understand their role in handling complaints.
- Treat everyone with dignity and respect at all times.
- If issues arise with regard to the unacceptable behaviour of employees from other organisations that the eCAPH does business with, eCAPH will take appropriate action to address such issues.

## What eCAPH Expects of Employees

eCAPH expects employees to:

- Take personal responsibility for observing, upholding, promoting and applying this policy and act in accordance with eCAPH 's values and behaviours.
- Treat everyone with dignity and respect at all times.
- Be aware of how their own behaviour may affect others and change it, if necessary an individual
  can still cause offence even if they are "only joking".
- Make it clear to others, including third parties (clients, suppliers and contractors) when employees find their behaviour unacceptable, e.g. inappropriate jokes or comments.
- Challenge unacceptable behaviour, where appropriate, if an employee sees it directed towards a colleague and promptly report any incident to stop sexual harassment and victimisation.
- Speak up without delay and ask for appropriate support if they experience sexual harassment.

- Treat private matters in strictest confidence and refrain from participating in, encouraging or condoning gossip related to cases of alleged or actual sexual harassment and victimisation.
- Support eCAPH 's policy by cooperating or participating if requested, for example by acting as a witness or, if they are a Chair, undertaking a specific role under the procedures in line with their job responsibilities.
- If in a Director or Chair position, they should always seek to set a good example by their own behaviour and provide a supportive and positive working environment.

# What is Sexual Harassment?

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment.

It also includes 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.

Sexual harassment can occur in many forms and can take place in person or online. While this is not an exhaustive list, examples may include:

- unwanted physical conduct, intimidation or "horseplay", including touching, pinching, pushing and grabbing;
- continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- unwelcome sexual advances, propositions or suggestive behaviour (which the harasser may perceive as harmless);
- leering, whistling or making sexually suggestive gestures;
- sharing sexually explicit jokes or anecdotes; or
- offensive emails, text messages or social media content.

It is not necessary for someone to object first before conduct can be described as unwanted. Also, a person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer or elsewhere in the workplace.

## Victimisation

Victimisation includes subjecting someone to a detriment because they have raised a complaint, given evidence or information in connection with a complaint or alleged that someone has contravened the Equality Act 2010. Victimisation can include, but is not limited to:

- denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment;
- excluding someone because they have raised a grievance about sexual harassment;
- failing to promote someone because they accompanied another employee to a grievance meeting;
   and
- dismissing someone because they gave evidence on behalf of another employee at a grievance meeting.

**Sexual harassment and victimisation are unlawful and will not be tolerated.** They may lead to disciplinary action up to and including dismissal if they are committed:

- in a work situation;
- during any situation related to work, such as at a social event with colleagues;
- against a colleague or other person connected to the federation outside of a work situation, including on social media; or
- against anyone outside of a work situation where the incident is relevant to their suitability to carry out their role.

eCAPH will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

## **Third Party Sexual Harassment**

Third party sexual harassment occurs where an employee is sexually harassed by someone who does not work for, and who is not an agent of, eCAPH, but someone with whom they have come into contact with during the course of their work. Third party sexual harassment could include, for example, unwelcome sexual advances from a temporary agency worker, school member/s, contractor or supplier visiting the location or where employees are visiting other work-related premises or other location in the course of their work. **There may be other examples.** 

Third party sexual harassment can result in legal liability and will not be tolerated. Employees are encouraged to report any third-party sexual harassment they are a victim of, or witness, in accordance with this policy. Any sexual harassment by an employee against a third party may lead to disciplinary action up to and including dismissal.

eCAPH will take steps wherever possible to **prevent** third party sexual harassment of employees, and if any third party sexual harassment of employees occurs, the Directors will take steps to remedy any complaints and to prevent it happening again. These can include, but are not limited to:

- issuing a warning to the harasser about their behaviour;
- informing their employer that a complaint has been raised against them, if appropriate;
- banning them from eCAPH's meeting/s and / or events; and
- reporting any criminal acts to the police.

# **Reporting Incidents of Sexual Harassment**

If an employee believes that they have been the victim of sexual harassment, they are encouraged to come forward and share their concerns with a Director so they can resolve the matter. eCAPH will take all such complaints seriously and, providing that the employee acted in good faith and their complaint is genuine, they will be protected and will not be penalised or victimised in any way.

If the harasser is a colleague, it can be dealt with in various ways, ranging from informal to more formal procedures as set out below. If the employee is experiencing sexual harassment by a third party, they are encouraged to report this to a Director without delay so that they can advise and support the employee on the best course of action.

Employees do not have to be a recipient or target to make a complaint about sexual harassment. If they see it happening or become aware of any issues of sexual harassment, they have the right to complain. Tackling sexual harassment is everybody's responsibility.

Some people may be unaware that their behaviour in some circumstances is sexual harassment. If it is clearly pointed out to them that their behaviour is unacceptable, the issue can sometimes be resolved. With this in mind, this policy includes an informal as well as a formal route to deal with complaints of sexual harassment.

If an employee believes they have witnessed the sexual harassment of a child or young person, they must inform a Director/s immediately to ensure that it is raised through the appropriate channels. A referral to the Local Authority Designated Officer (LADO) may be required.

## Informal route

The issue may be raised informally with the help of a Director or another colleague. The complaint should be listened to, and the Director should then work out how best they can help the employee to resolve the issue informally and in a way which is most comfortable for the employee. The following are possible options of how they may help and support an employee to resolve the issue informally:

- provide the employee with advice on how to approach the issue directly with the alleged harasser;
- support the employee in raising the issue with the alleged harasser by accompanying them in any discussion or helping them to set out their thoughts in writing;
- raise the matter informally with the harasser on the employee's behalf;
- consider mediation by a trained mediator between the employee and the alleged harasser; or
- help to obtain advice on how best to resolve the issue from other sources.

If the employee feels unable to speak to a Director because the complaint concerns them, then the employee should speak to an alternative Director. If this does not resolve the issue, the employee should follow the formal procedure below.

If an employee is not certain whether an incident or series of incidents amounts to sexual harassment, they should initially contact their line manager informally for confidential advice.

Directors recognise that an informal solution may not be appropriate or may not work in many cases. For example, an informal solution is unlikely to be suitable in more serious cases, employees may feel that they are not able to deal with the issue in this way or that informal steps are not appropriate, in which case they should consider making a formal complaint as set out below. Employees can make the matter formal at any stage if they wish to.

#### Formal route

If an employee wishes to make a formal complaint about sexual harassment, they should submit it in writing to a Director who will acknowledge their complaint within 5 working days of receipt.

The written complaint should set out full details of the conduct in question, including the name of the 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 from occurring.

If the employee wishes to make a formal complaint about victimisation, they should raise the matter formally in writing. The written complaint should set out full details of the conduct in question, including the name of the person or persons they believe have victimised them, the reason they believe they have been victimised, the nature of the victimisation, 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 from occurring.

The written formal complaint should be sent to a Director who will acknowledge the complaint within 5 working days of receipt. In some situations, the employee may be asked to provide further information.

## Investigation

Directors will appoint an independent person to act as the 'Investigating Officer' and they will conduct an investigation to gather information about the complaint. In some circumstances, a Director may look into the complaint themselves. Alternatively, it may be considered appropriate to appoint an Investigating Officer who is external to the organisation.

The Investigating Officer will arrange a meeting with the employee, usually within one week of receiving the complaint, so they have the opportunity to give their account of events. The investigation may also include examination of any documentary evidence (including electronic media), interviews with the person(s) involved and any relevant witnesses.

The employee (complainant) and the person against whom the complaint is made have the right to be accompanied by a fellow colleague, a trade union representative or an official employed by a trade union at any formal meeting (in person and virtual).

Where the complaint is about someone other than an employee, such as a customer, supplier or visitor, the Director will consider what action may be appropriate to protect the employee and anyone involved pending the outcome of the investigation, taking into consideration the reasonable needs of the school/academy and the rights of that person. Where appropriate, the Director will attempt to discuss the matter with the third party.

If the employee advises eCAPH that they have any disability related needs that need to be considered to enable them to participate in such a meeting, then any reasonable adjustments that are necessary will be made, to enable the employee to do so. Wherever possible, eCAPH will try to ensure that the employee and the person against whom the complaint is made are not required to work together while the complaint is under investigation. This could involve giving the employee the option of changing their work patterns where possible, or remaining at home on special leave, if agreed. In the case of serious allegations, the employee against whom the complaint is made may be suspended for a temporary period while the investigation is being carried out.

The Investigating Officer will also meet with the person against whom the complaint is made to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

It may be necessary to interview witnesses to any of the incidents mentioned in the complaint. If so, the importance of confidentiality will be emphasised to them.

The Investigating Officer will adopt an objective and balanced approach to the information gained as a result of the investigation and produce a detailed Investigation Report. The report will be given to the Director who will arrange a meeting with the employee (complainant) in order to discuss the outcome and what action, if any, should be taken. This meeting should take place within 30 working days of receipt of the original complaint. Employees have the right to bring a colleague or a trade union representative to the meeting.

A copy of the report and the findings will be given to the employee (complainant) and to the person against whom the complaint is made.

## **Action Following the Investigation**

If the Director considers that sexual harassment has occurred, prompt action will be taken to address it.

Where the harasser is an employee, the matter will usually be dealt with as a case of possible misconduct or gross misconduct under the eCAPH 's Disciplinary Policy and Procedure. Where the harasser is a third party such as a customer or other visitor, what action would be appropriate to deal with the issue will be considered.

eCAPH recognises that it is not always possible to arrive at a decisive finding of 'upheld' or 'not upheld' since employment situations are not always clear-cut. Sometimes the outcome may include an acknowledgement of the employee's concerns and/or an agreed action plan to address them.

Whether or not the complaint is upheld, the federation will consider how best to manage and support any ongoing working relationship between the employee (complainant) and the person concerned. It may be appropriate to arrange some form of counselling or to change the duties of one or both parties.

The outcome and any action/s to be taken will be confirmed in writing.

# **Appeal**

The person who has made the complaint has the right to appeal against the outcome of the investigation. If they wish to appeal, they must do so in writing, including the reasons for the appeal, within 10 working days of receipt of the letter confirming the decision and send it to the Directors in the first instance.

The appeal letter should clearly state the full grounds of their appeal, i.e. the basis on which they consider that their grievance has not been satisfactorily resolved. If their grounds of appeal are unclear, they may be asked to clarify these before a sexual harassment appeal hearing is held.

Appeals will be dealt with impartially and heard by a Director panel with no previous involvement in the process and will take place no less than 30 working days following the receipt of the appeal.

The employee will be given the opportunity to put forward their case and explain why they are not satisfied with the outcome. They have the right to be accompanied by a fellow colleague, a trade union representative or an official employed by a trade union.

The decision by the Director panel will be final. This is the end of the internal procedure and there is no further appeal.

# **Consequences of Breaching this Policy**

If, following a formal investigation, eCAPH finds that an employee has committed, authorised or condoned an act of sexual harassment, the issue will be dealt with as a possible case of misconduct or gross misconduct in accordance with the Disciplinary Policy and Procedure

eCAPH may take disciplinary action against the employee, up to and including dismissal (or other appropriate action for non-employees). The employee should be aware that any aggravating factors, such as abuse of power over a more junior colleague, will be taken into account in deciding what disciplinary action to take.

## **Protection and Support**

Anyone who makes a complaint, reports that they have witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of detrimental treatment or victimisation as a result. If eCAPH finds that an employee has victimised anyone in this way, disciplinary action may be taken against the employee under eCAPH's Disciplinary Policy and Procedure (or other appropriate action for non-employees).

If an employee believes they have suffered any such treatment, they should inform the Directors

## **Malicious complaints**

eCAPH understands that all formal complaints should be **accepted in good faith** and investigated accordingly. However, where an investigation finds that the allegation is false and made in bad faith (that is, without an honest truth in its belief), the employee may face disciplinary action.

An employee will not be subjected to disciplinary action or to any other detriment simply because their complaint is not upheld.

# **Timescales**

In the best interests of both the employee who has raised the complaint and the person against whom the complaint is made, it is important that the investigation and resolution of the complaint are completed **as promptly as possible** and notification made of the estimated timescales.

All those involved in the sexual harassment process must give appropriate priority to the complaint and adhere to any specified time limits to enable expedition of the process.

Exceptionally, there may be circumstances where it may be necessary to extend timescales. In these circumstances, all parties will be updated on a regular basis on the progress and any revised timescales.

## **Recording of Meetings**

A written record of all meetings conducted under this procedure will be made, either by the person holding the meeting or by an additional person arranged by eCAPH to take notes. The employee, or any person acting on their behalf, are not normally permitted to record electronically any meeting that is held under this procedure. This is to encourage openness and full participation. Any breach of this provision may lead to disciplinary action.

## **Data Protection**

eCAPH processes personal data collected during informal and formal complaints in accordance with its data protection policy. In particular, data collected as part of informal complaints and the sexual harassment procedure is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints or conducting the sexual harassment procedure. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with eCAPH's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under eCAPh's Disciplinary Policy and Procedure.

## **Advice and Support**

eCAPH understands that issues around sexual harassment and victimisation can be difficult and extremely stressful for all concerned, both for colleagues who feel they have been the victim of sexual harassment or victimisation, but also for those complained about. **eCAPH will extend the same support to all employees involved to seek to ensure that they are treated fairly, calmly and receive the appropriate help.** 

# **External Sources of Help**

Equality Advisory and Support Service (equalityadvisoryservice.com)

Protect - Speak up stop harm - Whistleblowing Homepage (protect-advice.org.uk)

Home | Rights of Women

## **Equality**

eCAPH is committed to promoting equal opportunities in employment. Employees (and any job applicants) will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, religion or belief, sex or sexual orientation or caring responsibility. This means that the application of the policy and procedure may need to be adjusted to cater for the specific needs of an individual including the provision of information in alternative formats where necessary.

# **Monitoring and Review**

eCAPH will monitor this policy and procedure to ensure that it is operating fairly, consistently and effectively. The policy and procedure will also be reviewed in the light of operating experience and/or changes in legislation.

# RISK ASSESSMENT FORM – PROTECTING WORKERS FROM SEXUAL HARASSMENT

ecs: Cheshire Association Primary Headteachers			NAME OF ASSESSOR:  SIGNATURE:  DATE:			
SITUATION/AREA WHERE STAFF MAY BE MORE AT RISK OF SEXUAL HARASSMENT	WHY THIS IS A SITUATION/AREA OF INCREASED RISK?	WHAT ARE YOU DOING ALREADY?	DO YOU NEED TO DO ANYTHING ELSE TO CONTROL THIS RISK?	ACTION: WHO?	ACTION: WHEN?	DONE
Examples highlighted have been added	these will need to be deleted and risks i	elevant to the job r	ole and working environment will need to be inclu	ded, add more i	rows/hazards a	s necessary.
Interactions between staff and external visitors (e.g. contractors, parents, etc.)	Spaces used for this type of interaction may be less supervised/visible.		Encourage staff to keep a written record of conversations, especially where they are made to feel uncomfortable (even if they're not sure that what happened counts as harassment).			
Staff events, such as parties and away days	Staff may harass their colleagues when they feel as though they're 'offduty'.		Raise staff awareness of sexual harassment, along with eCAPH's zero-tolerance approach to it.			
Staff communications online/outside of working hours	Staff may be at risk of sexual harassment from their colleagues, where those perpetrators feel it is less visible.		Remind staff of your policies around internet and IT acceptable use, and social media.  Also, remind staff that your dignity at work or staff code of conduct/ behaviour policy applies just as much to online/out-of-hours behaviour as it does to in-person behaviour during the school day.			

Makeup of certain groups and potential power imbalances	Staff may feel more vulnerable to sexual harassment when in certain spaces and with certain colleagues, e.g. around more experienced colleagues or those with more authority.	Proactively ask staff individually about which spaces and situations they feel uncomfortable in, and why and review those situations.  Remind staff:  That sexual harassment is never OK, regardless of the perpetrator's status.  Who they can talk to if they feel uncomfortable around certain colleagues.  How to report sexual harassment.
Lone working	Staff may feel more vulnerable to sexual harassment when working alone.	Conduct regular check-ins with lone workers to ensure their wellbeing and help identify any potential issues.  Consider the implementation of safety measures, such as panic buttons or CCTV cameras, which may serve as deterrents and provide a sense of security.  Make efforts to ensure that there are always two members of staff on duty whenever possible.  Provide comprehensive training to staff on recognising and reporting sexual harassment, bystander intervention and the consequences of sexual harassment. This training should focus on creating a supporting environment and empowering staff to speak up.

Power imbalances	Staff who are in subordinate positions, including [junior employees and new recruits], may be at higher risk of experiencing sexual harassment. This is because the power imbalances that exist in such in such relationships can create opportunities for exploitation. It may also be more difficult for individuals in these subordinate positions to speak up due to fear of negative consequences or retaliation.	Provide comprehensive training to staff on recognising and reporting sexual harassment, bystander intervention and the consequences of sexual harassment. This training should also cover power imbalances and how they can contribute to sexual harassment.  Provide additional training for managers that is aimed at preventing abuses of power and their role in preventing and stopping bullying and harassment from occurring in the workplace.  Ensure managers involved in handling sexual harassment complaints are given appropriate training.	
Presence of alcohol	Staff attending [work-related social events/conferences] where alcohol is consumed may be more vulnerable to sexual harassment. Alcohol consumption can impair judgement and lower inhibitions, potentially leading individuals to behave in ways that they would not in a sober state.	For events that are due to take place, ensure there is appropriate supervision and adequate staffing levels to monitor and address any potential incidents of sexual harassment promptly.  Designate specific staff members as points of contact for individuals to report concerns or seek assistance.  Arrange appropriate transportation to mitigate any risk.  Reinforce relevant policies leading up to these events to remind staff and attendees about the importance of ensuring a safe environment, free from discrimination, bullying or harassment.	

Third-party contact	Staff working who regularly come into contact with suppliers and contractors may be more vulnerable to sexual harassment due to a higher frequency of interactions.	Provide comprehensive training to staff on recognising and reporting sexual harassment and the consequences of sexual harassment. This training should also cover how to handle difficult interactions with third parties, setting boundaries, and empowering individuals to remove themselves from difficult situations.  Provide additional training for managers to ensure that they are able to support individuals who have been subjected to harassment by a third party and their role in preventing and stopping harassment.  Ensure that eCAPH's zero tolerance approach to sexual harassment is communicated to third parties via email and notices displayed in public areas	
Lack of diversity	A lack of diversity in senior leadership and managerial roles can result in a significant power imbalance, which may lead to women and groups from other underrepresented backgrounds throughout the organisation feeling marginalised, more vulnerable to sexual harassment and less empowered to speak up due to fear of retaliation.	Provide regular diversity and inclusion training to senior leaders and managers with a focus on unconscious bias. Run a mentorship scheme where senior leaders can learn from others about their lived experiences and the challenges that they have faced at work because they are from an underrepresented or minority group.  Set up equality, diversity and inclusion events and workshops through employee resource groups. Ensure senior leaders and managers attend these events and workshops to educate themselves on the challenges faced by others.  Take reasonable and appropriate steps to encourage job applications for senior leadership and managerial roles from as diverse a range of people as possible.	

Particular events that raise tensions locally or nationally	Events that raise tensions locally or nationally can create strong reactions, polarise opinions and create division in the workplace. In such environments, individuals may feel compelled to assert their beliefs forcefully, sometimes leading to harassment or hostile behaviour towards those in the workplace with differing perspectives.	Provide comprehensive training to staff on recognising and reporting sexual harassment, bystander intervention and the consequences of sexual harassment.  Remind staff of eCAPH's zero tolerance approach to discrimination, bullying harassment and sexual harassment in the workplace during any such event and reinforce the Anti-bullying and harassment policy.  Conduct regular check-ins with workers during any such event to ensure their wellbeing and help identify any potential issues.		
Cultural norms at the workplace	A workplace culture that tolerates certain attitudes, inappropriate behaviours and stereotypical views where employees are not treated with dignity and respect may make staff more vulnerable to sexual harassment.	Provide comprehensive training to staff on recognising and reporting sexual harassment, bystander intervention and the consequences of sexual harassment.  Provide regular diversity and inclusion training to senior leaders and managers with a focus on unconscious bias and their role in preventing and stopping discrimination, bullying and harassment from occurring in the workplace.  Monitor our workplace culture through anonymous surveys, exit interviews, one-to-one conversations, return-to-work meetings and employee resource groups to identify and address any high-risk issues.  Engage workplace champions who are trained in sexual harassment awareness.  Ensure anti-harassment and anti-bullying policy is reviewed and communicated to staff regularly.		