**Freedom of Information Request: Our Reference CTMUHB_343_26**

**You asked:**

1. A copy of the organisation's current policy or policies relating to sexual misconduct and/or sexual harassment
2. Copies of any records, reports, meeting minutes, policy review documents, or other documentation showing changes, updates, reviews, or amendments made to these policies since 26 October 2024, when the Worker Protection (Amendment of Equality Act 2010) Act 2023 came into effect.
3. Copies of any records showing how these policies have been communicated or promoted to staff since 26 October 2024, including (but not limited to) staff communications, training materials, intranet announcements, awareness campaigns, guidance documents, or briefing materials.
4. Details of the policies, procedures, reporting channels, and guidance available to staff for reporting sexual misconduct or harassment, including any mechanisms that allow reports to be made anonymously or confidentially.

If any part of this request exceeds the appropriate cost limit, please advise me how it may be refined so that the information can be provided.

**Our response:**

Please see attachments 1 – 9.

The NHS Wales Anti-sexual Harassment Policy is the current policy addressing sexual misconduct and sexual harassment. Prior to its introduction, concerns relating to harassment were managed through a number of existing policies and procedures, including the Procedure for NHS Staff to Raise Concerns, the All Wales Respect and Resolution Policy, and the Procedure for Dealing with Anonymous Communications. These frameworks enabled staff to report and resolve a broad range of harassment-related issues. Copies of these policies are attached for reference.

In November 2025, the Procedure for Dealing with Anonymous Communications was replaced by the Speaking Up Safely Guidance, strengthening the approach to confidential and anonymous reporting.
All policies and procedures are made accessible to staff via the People Policies SharePoint page. Additionally, communication articles are circulated to inform staff of the introduction of new policies or updates to existing ones. Sample communication materials are attached for reference.

The Anti-sexual Harassment Policy and the enhanced Speaking Up Safely approach were launched together in November 2025 as part of a comprehensive framework of policies, procedures, and reporting channels to address unacceptable workplace behaviours. To support implementation:

- A redesigned intranet page was developed;

- The Work In Confidence platform was introduced, incorporating anonymous communication functionality;
- Guardians and an Administrator were appointed and trained to promote the initiative and build staff confidence in speaking up.

Both prior to and following November 2025, staff have been able to raise concerns through multiple reporting channels, including:

1. Line Manager (or Senior Manager where the Line Manager is implicated);
2. Trade Union or Staff Representative;
3. Workforce & OD (HR) teams;
4. Director of Corporate Governance;
5. Raising Concerns / Speaking Up Safely Champion (Independent Board Member);
6. Raising Concerns Hotline (confidential telephone service).