Reporting and Escalation Procedures for Third-Party Harassment Breaches

The OPCC is committed to taking all reports of harassment, abuse, discrimination, bullying, intimidation and other breaches of this Code seriously. Employees, workers and volunteers are encouraged to report concerns promptly so appropriate action can be taken.

Reporting a Breach

Any employee who experiences, witnesses or becomes aware of conduct that breaches this Code should report the matter as soon as reasonably practicable through one of the following channels:

- Their line manager.
- A more senior manager where appropriate.
- OPCC HR.
- The OPCC's designated reporting processes for dignity at work, harassment or unacceptable behaviour.
- Security or event leads during public meetings or engagement events.
- Contract managers where the concern relates to a contractor, supplier or partner representative.

Where a member of staff feels unable to report a matter through normal management channels, alternative reporting routes will be made available.

Information to Include

Where possible, reports should include:

- Date, time and location of the incident.
- Name of the individual(s) involved.
- Details of what was said or done.
- Whether there were any witnesses.
- Copies of relevant evidence, such as emails, messages, social media posts, screenshots or recordings where legally permissible.
- Any immediate impact on the employee or others present.

A lack of supporting evidence will not prevent concerns from being reported or considered.

Immediate Response

Where a breach occurs, the OPCC may take immediate action to protect employees, including:

- Ending a telephone call or online discussion.
- Suspending a meeting.
- Removing an individual from a meeting, event or OPCC premises.
- Restricting direct contact with affected staff.
- Arranging alternative points of contact.
- Seeking support from security personnel or police where necessary.

Investigation and Review

Reported incidents will be reviewed promptly and proportionately. Depending on the nature and seriousness of the concern, the OPCC may:

- Obtain statements from those involved.
- Review meeting records, correspondence and available evidence.
- Consult with partner organisations, suppliers or contractors.
- Conduct a formal investigation where appropriate.
- Determine suitable actions to prevent recurrence.

The OPCC will maintain records of reported incidents and actions taken in accordance with data protection requirements.

Outcomes Following a Breach

Following review or investigation, the OPCC may implement one or more of the following measures:

- Formal warning regarding future conduct.
- Removal from an event, meeting or premises.
- Restriction of future attendance at OPCC meetings or activities.
- Requirement to communicate through nominated channels only.

- Escalation to the individual's employer, organisation or professional body.
- Contract management action in relation to contractors or suppliers.
- Suspension or termination of partnership engagement where appropriate.
- Referral to the police or other authorities where criminal behaviour is suspected.

Support for Employees

Employees who experience third-party harassment or abuse will be supported by the OPCC. Support may include:

- Management support and debriefing.
- Advice from Human Resources.
- Access to wellbeing support services and employee assistance programmes.
- Adjustments to working arrangements where appropriate.
- Measures to reduce the risk of further contact with the individual concerned.

No employee will be expected to tolerate harassment, discrimination, abuse or threatening behaviour as part of their role.

Learning and Monitoring

The OPCC will monitor reports of third-party harassment and other breaches of this Code to:

- Identify recurring risks.
- Inform risk assessments.
- Improve preventative measures.
- Review security and event management arrangements.
- Ensure compliance with legal obligations relating to the prevention of workplace harassment, including harassment by third parties