OFFICE OF THE POLICE & CRIME COMMISSIONER
Sexual Harassment, Harassment, Bullying and Victimisation Policy

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1. Purpose

1.1 The Police & Crime Commissioner is committed to promoting an inclusive environment in which any member of staff or volunteer treats everyone with dignity and respect and in which staff can work free from sexual harassment, bullying and victimisation. The Office of the Police & Crime Commissioner takes a zero tolerance to bullying, sexual harassment or victimisation of any sort.

1.2 The OPCC is committed to staff feeling safe and supported and having access to redress if such behaviour does arise. Complaints will be taken seriously and not be ignored.

1.3 The policy applies to all working arrangements and places where legitimate Police & Crime Commissioner activity is carried out, and extends to inappropriate behaviour at work-related functions, e.g. office parties.

1.4 The OPCC is committed to taking all reasonable steps to prevent sexual harassment, harassment, bullying and victimisation. We recognise our legal duty to proactively

identify, assess and address risks before incidents occur and to create a safe, respectful and inclusive working environment for all staff, volunteers, contractors and other workers. The OPCC will maintain effective reporting mechanisms, training programmes, risk assessments and organisational learning processes to support this commitment.

1.5 OPCC leaders and managers will maintain an open-door policy, and we encourage all staff to come forward with any concerns in relation to sexual harassment. All our staff have a responsibility to behave in line with the requirements of this policy.

1.6 Instances of sexual harassment, bullying or victimisation may lead to disciplinary action up to, and including, termination of employment. This may also lead to criminal reporting to the police.

2. Scope

2.1 The OPCC will not tolerate any forms of sexual harassment, victimisation, or bullying and seek to ensure that the working environment is safe and supportive to all those who work for the OPCC. This policy applies to all employees, consultants, self-employed contractors, casual workers, agency workers, volunteers, and interns within the Office of the Police & Crime Commissioner.

2.2 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. The Legal Framework

3.1 Sexual harassment takes many forms, but whatever form it takes it is unlawful under the Equality Act 2010 as amended.

3.2 This policy sets out a framework for managers to deal with any sexual harassment, victimisation, or bullying that occurs by staff (which may include consultants, contractors, and agency workers) and by third parties such as customers, suppliers, or visitors to our premises.

3.3 The Employment Rights Act 2025 strengthens employers' duties to prevent workplace harassment. The OPCC is committed to taking all reasonable steps to prevent sexual harassment and other unlawful harassment and to protecting staff from harassment by third parties including members of the public, partners, suppliers, contractors and visitors.

3.4 **Prevention Commitment**

Prevention and Organisational Learning

The OPCC adopts a preventative approach to harassment. We will:

- undertake regular workplace harassment risk assessments;
- identify situations and activities that may create increased risk;
- implement control measures and action plans where risks are identified;
- provide appropriate training to managers and staff;
- encourage staff to report concerns and inappropriate behaviour;
- analyse complaints, grievances, survey results and exit interview data;
- review emerging themes and organisational risks;
- act in response to lessons learned.

These measures form part of the OPCC's commitment to taking all reasonable steps to prevent harassment from occurring.

Definitions

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may be committed by a fellow worker, a stakeholder of an organisation, or a third party. It does not need to occur in person. It can occur via digital means, including social media sites or channels (e.g. WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour.

Examples of sexual harassment include, but are not limited to:

- sexual comments or jokes, which may be referred to as "banter"
- displaying sexually graphic pictures, posters or photos
- suggestive looks, staring or leering
- propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person's private or sex life or a person discussing their own sex life
- sexual posts or contact in online communications, including on social media
- spreading sexual rumours about a person
- sending sexually explicit emails, text messages or messages via other social media
- unwelcome touching, hugging, massaging or kissing
- criminal behaviour including sexual assault, stalking, grooming and sending offensive communications.

Harassment

Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Unwanted conduct covers a wide range of behaviour. It can include:

- spoken words
- banter
- written words
- posts or contact on social media
- imagery
- graffiti
- physical gestures
- facial expressions
- mimicry
- jokes or pranks
- acts affecting a person's surroundings
- aggression
- physical behaviour towards a person or their property

It is important to note that the individual does not have to specifically state that the behaviour is unwanted, as the action itself is plainly a violation of a person's dignity.

Harassment can fall into three main categories:

- harassment related to a relevant protected characteristic,
- sexual harassment,
- less favourable treatment of a worker because they submit to, or reject, sexual harassment or harassment related to sex or gender reassignment.

The relevant protected characteristics as defined under the Equality Act 2010 are:

- age
- disability
- gender reassignment
- race
- religion or belief
- sex
- sexual orientation

Bullying

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour; an abuse or misuse of power through means intended to humiliate, denigrate, or injure the recipient. Bullying does not include legitimate and constructive criticism of performance or behaviour or the occasional argument or raised voice. It may take place in the context of any relationship, including supervisor/staff relationships, peer-to-peer interactions, or any other relationship in the workplace.

Examples of behaviour that could amount to bullying include:

- Aggression, including threats, shouting abuse and obscenities.
- Deliberate ignoring, excluding or victimisation.
- Deliberately undermining of a colleague and/or unjustifiable constant criticism.
- Constant undervaluing of an employee's efforts.
- Overbearing supervision.
- Setting an employee up to fail, for example, giving responsibilities outside experience or constantly shifting objectives.
- Unfair treatment.
- Unreasonable refusal of requests, for example, leave, training or promotion.
- Misuse of power and position.
- Continuous berating/reprimanding an individual in the presence of others.
- Insulting and uncooperative behaviour.

Victimisation

Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do, an act which is protected under discrimination and harassment laws. These are outlined below. It is not necessary for the person to have done the protected act for detrimental treatment to be considered as victimisation.

The protected acts are:

- making a claim or complaint under the Equality Act (e.g. for discrimination or harassment).
- helping someone else to make a claim by giving evidence or information in connection with proceedings under the Equality Act.
- making an allegation that someone has breached the Equality Act.
- doing anything else in connection with the Equality Act.

Examples of victimisation may include:

- failing to consider someone for promotion because they have previously made a sexual harassment complaint.
- dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint.
- excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

4. Circumstances which are covered

4.1 This policy covers behaviour which occurs in the following situations:

- a work situation
- a situation occurring outside of the normal workplace or normal working hours which is related to work, e.g. a working lunch, a business trip or social functions
- outside of a work situation but involving a colleague or other person connected to the organisation, including on social media
- against anyone outside of a work situation where the incident is relevant to your suitability to carry out the role.

5. What to do if you are subject to sexual harassment, harassment, bullying or victimisation

5.1 The OPCC are committed to ensuring that there is no sexual harassment, harassment, bullying or victimisation in our workplace. Allegations will be treated as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of our Disciplinary procedure.

6. Informal complaint

6.1 We recognise that complaints of sexual harassment, harassment, bullying or victimisation can be of a sensitive or intimate nature and that it may not be appropriate for a staff member to raise the issue through our normal grievance procedure. In these circumstances, the staff member is encouraged to raise such issues with a senior colleague of their choice (whether or not that person has a direct supervisory responsibility for them) as a confidential helper and who can provide confidential advice and assistance in resolving the issue formally or informally. This person cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.

6.2 If the staff member experiences sexual harassment or harassment and they feel comfortable to do so, they should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If they feel unable to do this verbally then they should hand a written request to the harasser, and your confidential helper can assist you in this.

6.3 In addition, the staff member may also choose to raise concerns during their regular communication with their line manager, e.g. in a one-to-one meeting. The line manager should listen and take the concerns seriously. The line manager may encourage the staff member to follow the reporting procedures set out below.

6.4 If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below and/or refer to our Grievance Procedure.

6.5 Mediation may also be offered to the parties concerned. A third party who has not been actively involved in the situation would facilitate this. For this to be successful, both parties need to be willing to participate in the process.

6.6 Regardless of the outcome of the informal process, the individual retains the right to pursue the issue through a formal mechanism.

6.7 The informal procedure must not be used in the event of a serious allegation, as potentially a criminal act has taken place. Incidents of this nature must be reported to the individual's Line Manager or, if this is not appropriate, the Directorate lead. They will speak to the staff member about whether they want to report the matter to the police and support them if they go ahead.

7. Formal complaint

7.1 Where the informal approach fails or if the sexual harassment, harassment, bullying or victimisation is more serious, the staff member should bring the matter to the attention of their line manager or OPCC HR as a formal written complaint and again your confidential helper can assist you in this.

7.2 If possible, the staff member should keep notes of what happened so that the written complaint can include:

- the name of the alleged harasser
- the nature of the alleged harassment
- the dates and times when the alleged harassment occurred
- the names of any witnesses
- any action already taken by you to stop the alleged harassment.

7.3 The employee should make a formal complaint in writing, setting out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, 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. This should be sent to their Line Manager or, if this is not appropriate, the Directorate lead.

7.4 On receipt of a formal complaint the OPCC Grievance procedure will be followed.

7.5 As a general principle, the decision whether to progress a complaint is up to the individual affected. However, the OPCC has a duty to protect all staff and may pursue the matter independently if, in all the circumstances, it is considered appropriate to do so. Following the formal procedure is vital when the case is particularly serious, if criminal prosecution may result. Sexual Misconduct Advocates provide independent, confidential support to anyone who has experienced or witnessed inappropriate sexual behaviour within ASP or the OPCC. See further information in section 13.

7.6 The OPCC will take action to separate the staff member from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

7.7 Where your complaint is about someone other than an employee, such as a member of the public, stakeholder, or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the

investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.

7.8 The staff member will not be victimised for having brought a complaint.

7.9 **Whistleblowing Protection**

Staff who raise concerns regarding actual, suspected or anticipated sexual harassment may be protected under both this policy and the OPCC Whistleblowing Policy.

Disclosures relating to sexual harassment, unsafe workplace cultures, failures to comply with this policy or concerns regarding systemic inappropriate behaviour may constitute protected disclosures under whistleblowing legislation.

No worker will suffer detriment, disadvantage or adverse treatment because they have raised concerns in good faith, supported another person's complaint, or participated in an investigation.

Any allegation of retaliation against a worker who raises a concern will be treated seriously and may result in disciplinary action.

8. What to do if you witness sexual harassment, harassment, bullying or victimisation

8.1 If a staff member witnesses sexual harassment, harassment, bullying or victimisation, they are encouraged to act appropriate action to address it. The staff member should not take any action that may put them at risk of sexual harassment or other harm. If they feel able, they should intervene to prevent the matter continuing. If they cannot do this, action may include offering support to the person who has been sexually harassed and encouraging them to report the incident or reporting the incident themself.

8.2 If reporting the incident, the staff member you should bring the matter to the attention of their line manager or OPCC HR in writing.

8.3 The staff member's concerns will be handled by an appropriate manager who will sensitively talk to the person subject to sexual harassment, harassment or bullying to determine how they want the matter to be handled.

9. Third Party Harassment

9.1 Third-party harassment occurs when a member of the OPCC is subjected to unwanted conduct by an individual who is not employed by the OPCC and who is encountered in connection with work.

This may include customers, providers, contractors, consultants, partnership organisations, stakeholders, delegates, volunteers, visitors or members of the public.

9.2 The OPCC will not tolerate harassment or sexual harassment by third parties.

This includes conduct related to any protected characteristic under the Equality Act 2010, including age, disability, race, religion or belief, sex, sexual orientation and gender reassignment, as well as sexual harassment and victimisation.

9.3 The law does not provide a mechanism for individuals to bring a claim of third-party harassment alone. However, failure for an employer to take reasonable steps to prevent third-party sexual harassment may result in legal liability in other types of claim.

9.4 In order to prevent third-party harassment, the OPCC will, where appropriate:

- communicate behavioural expectations for external meetings and events to providers, visitors, members of the public, stakeholders and partners via meeting agenda's and joining instructions;
  promote behavioural expectations for meetings and events and Third-Party conduct statement via the OPCC website and email signatures;
- include standards of behaviour within provider and contractor documentation;
- communicate zero-tolerance expectations at public events and engagement activities;
- support employees who experience third-party harassment and provide manager guidance via the OPCC Complaints policy;
- investigate and record incidents;
- take action against those responsible where appropriate.

9.5 If a staff member has been subjected to third-party sexual harassment, they are encouraged to report this as soon as possible to their line manager or Directorate lead.

9.6 Should a stakeholder or member of the public sexually harass a member of the OPCC, we will warn them about their behaviour, share information relating to the incident with SLT and the relevant organisation. Any criminal acts will be reported to the police.

9.7 The OPCC will not tolerate sexual harassment by any member of the OPCC against a third party. Instances of sexual harassment of this kind will lead to disciplinary action, including termination of employment.

9.8 The OPCC will ensure third-party harassment risks are considered within an annual workplace harassment risk assessment and through event planning processes.

OPCC behavioural expectations for meeting and event attendance OPCC Behavioural Expectations for Meeting and Event Attendees.docx

OPCC code of conduct for third parties OPCC Code of Conduct for Third-Parties.docx

Reporting and escalating procedures for third party harassment Reporting and Escalation Procedures for Third Party Harassment.docx

10. Disciplinary action

10.1 If the decision is that the allegation of sexual harassment, harassment, bullying or victimisation is well founded, the harasser/victimiser will be liable to disciplinary action in accordance with the OPCC Disciplinary procedure up to, and including, summary dismissal. An employee who receives a formal warning or who is dismissed for sexual harassment/harassment/bullying/victimisation may appeal by using the OPCC Appeals procedure.

10.2 When deciding on the level of disciplinary sanction to be applied, the OPCC will take into consideration any aggravating factors affecting the case. One example of aggravating factors is an abuse of power over a more junior colleague.

10.3 Action could include:

- some form of disciplinary action (including dismissal for gross misconduct), and/or,
- an undertaking by the individual that the unwelcome behaviour will stop;
- an apology and/or an agreement to take part in awareness training;
- civil or criminal proceedings by the Office of the Police & Crime Commissioner or the Police.

10.4 Where incidents progress to the Disciplinary Procedure, management reserves the right to determine the level of confidentiality to be maintained regarding the outcomes of cases. It will not normally be regarded as appropriate that the details of any management action are reported back to the complainant. If the investigation shows that there is no case of bullying, harassment, or discriminatory behaviour, both parties should be provided with a full explanation.

10.5 If, due to the investigation, it is concluded that the staff member's complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against the staff member.

11. Training and engagement

11.1 The OPCC will provide training to all our staff on sexual harassment to ensure there is a clear understanding of:

- what sexual harassment is, how it may occur and that it will not be tolerated
- expected levels of behaviour
- how they can report any incidents of having been sexually harassed or having witnessed it
- how acts of harassment will be dealt with under the disciplinary procedure, which can potentially result in dismissal.
- the policy, the content and its implementation.

11.2 The OPCC will maintain a comprehensive programme of harassment prevention training.

All staff must complete mandatory harassment and sexual harassment training on appointment and thereafter as required.

Training will include:

- Sexual Harassment in the Workplace
- Upstander training
- Abuse of position for sexual purposes
- Equality Act 2010;

Enhanced guidance for managers is available covering:

- identifying and assessing harassment risks;
- recognising early warning signs and cultural issues;
- responding appropriately to disclosures and complaints;
- trauma-informed management approaches;
- preventing and managing third-party harassment;
- maintaining confidentiality and records;

- whistleblowing obligations;
- lessons learned from investigations and complaints.

The OPCC will maintain records of all training undertaken and monitor completion rates as part of its prevention strategy.

11.3 Staff are expected to be familiar with relevant OPCC policies and procedures including:

- Complaints policy,
- Whistleblowing policy
- Code of Conduct
- Third Party code of conduct
- Behavioural expectations for meeting and event attendance
- Reporting and escalating procedures for third party harassment

11.4 The OPCC will run staff surveys and exit interviews and line managers will hold regular 1:1s with staff members. The OPCC have an open-door policy.

12. Responsibilities

We all have a responsibility to create and maintain a work environment free of harassment and victimisation and to treat our colleagues with dignity and respect.

Management

12.1 Managers have a responsibility to implement the zero-tolerance policy and to take steps to prevent bullying, harassment and victimisation occurring by creating a safe, supportive and inclusive working environment, promoting staff awareness of the policy, and encouraging staff to report incidents. Managers must also be aware of the potential for sexual harassment by third parties.

12.2 Lead by example by their own behaviour.

12.3 Line Manager should conduct regular 1:1s to understand any potential issues and steps and measures in place are effective. Managers should ensure staff members are aware of:

- how they can report sexual harassment, bullying and victimisation
- the sexual harassment, bullying and victimisation policy
- the standard of behaviour expected of them
- encourage staff to intervene and challenge to stop bullying and harassment
- the consequences of breaching the policy

12.4 Managers must deal with any complaint about bullying, sexual harassment, or victimisation, seriously, objectively, expeditiously, and confidentially.

12.5 Managers must seek advice on the procedure to be followed, maintain appropriate confidentiality as far as is legitimately possible and ensure that, as far as reasonably practicable, after a complaint has been resolved, there are no further problems of bullying, harassment, discrimination, or any victimization.

12.6 Managers must record all decisions and advice given.

12.7 Managers are responsible for taking proactive steps to prevent harassment rather than solely responding to complaints.

Managers must:

- identify risks within their teams and working arrangements;
- ensure appropriate control measures are implemented;

- monitor team culture and behaviour;
- encourage early reporting of concerns;
- ensure staff understand reporting routes;
- address inappropriate behaviour promptly;
- review learning from complaints and investigations;
- complete required management training;
- maintain records of preventative action taken.

Managers must be able to demonstrate the steps taken to prevent harassment within their area of responsibility.
Guidance for line managers has been developed. Guidance for managers Preventing and Managing Harassment at Work Oct 26.docx

Employees

12.8 Employees have a responsibility to comply with this policy and treat all their colleagues with fairness, dignity, and respect.

12.9 Employees should:

- where possible make it clear that they find bullying, harassment, or discrimination unacceptable, and report it as appropriate. If proven, incidents of bullying, harassment or discrimination may amount to gross misconduct which may result in dismissal without notice or payment in lieu of notice.
- take a stand against inappropriate behaviour and be clear with others when their behaviour is unacceptable.

13. Sources of Advice & Support

13.1 Advice and support for anyone affected by sexual harassment, bullying or victimisation may be sought from:

- Line Manager
- OPCC HR
- Unison
- Occupational Health
- Staff Networks and Associations
- ASP Sexual Misconduct Advocates (SMAs)
- Mental Health First Aiders
- Oscar Kilo national police wellbeing service
- Victim Support
- Suzy Lamplugh Trust
- Survivors UK
- Equality and Human Rights Commission

13.2 Further support is available by contacting the Employee Assistance Programme (EAP), a confidential 24-hour telephone counselling service, which can be accessed via Pocketbook. Employee Assistance Programme (EAP) - Pocketbook

13.3 The OPCC can make use of ASP Sexual Misconduct Advocates (SMAs) who can offer advice on how to deal with a situation, as well as signposting to a wide range of external support networks. Sexual Misconduct Advocates (SMAs) - Pocketbook
Sexual Misconduct Advocates provide independent, confidential support to anyone who has experienced or witnessed inappropriate sexual behaviour within ASP or the OPCC. They are a network of police officers and staff across a variety of departments and rank and are fully accredited by Lime Culture to provide advice or support to an individual through the reporting process.
See OPCC process map for referral into Sexual Misconduct Advocacy. Referral into the SMA is confidential and is victim led. SMA Process Map OPCC version.pptx

14. Managing time off because of sexual harassment

14.1 Time off that results from sexual harassment will be managed through the attendance and absence policy. This absence will not count towards any absence triggers and will be paid time off.

14.2 Appointments for specialist support will be considered.

15. Assessing and Managing risk

15.1 The OPCC will undertake an annual Workplace Harassment Risk Assessment designed to identify and reduce the risk of harassment, sexual harassment, bullying and victimisation.

Risk assessments will consider:

- workplace culture and behaviour;
- power imbalances and vulnerable groups;
- lone working and one to one contact;
- social events and work-related functions;
- digital environment;
- public-facing work – meetings, events and community engagement;
- Victims contact and public enquiries;
- Partnership meetings and governance;
- Contractors, providers and consultants;
- Social media and online engagement.

Risk assessments will be reviewed:

- annually;
- following significant incidents;
- following organisational change;
- where staff surveys identify concerns;
- where complaint trends indicate emerging risks.

Action plans will be developed and monitored where risks are identified.

The OPCC will retain evidence of risk assessments, training, communications, investigations, action plans and organisational learning activities to demonstrate compliance with its preventative duties.

OPCC Harassment Risk Assessment_template.docx

16. Confidentiality and Record-Keeping

16.1 Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.

Nothing in this policy prevents an individual from:

- making a protected disclosure under whistleblowing legislation;

- reporting criminal conduct;
- seeking professional, medical, legal or trade union advice;
- reporting concerns to a regulator or law enforcement agency;
- exercising any statutory right relating to harassment, discrimination or victimisation.

Any confidentiality requirements arising from investigations will be applied only to the extent necessary to protect the integrity of the process and the wellbeing of those involved.

16.2 Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

16.3 The Police & Crime Commissioner will comply with their statutory duty to monitor and report on all racist incidents. Additionally, all incidents/complaints will be monitored on the basis of ethnicity, disability, sex, gender, and sexual orientation.

17. Monitoring and evaluation

17.1 The Chief Executive and Head of HR & Business Services will review the effectiveness of the OPCC's harassment prevention arrangements periodically alongside the annual risk assessment.

Review will consider:

- workplace harassment risk assessments;
- formal and informal complaints;
- third-party harassment incidents;
- grievance and whistleblowing data;
- staff survey results;
- exit interview themes;
- training compliance rates;
- lessons learned from investigations.

Findings and actions will be reported to the Senior Leadership Team to support continuous improvement and organisational learning.

An annual harassment prevention report will be presented to the Senior Leadership Team summarising risks, trends, actions taken and priorities for improvement.

18. Appeals

18.1 The complainant has the right to a formal appeal at the end of the process if they are not satisfied with the outcome and should refer to the Appeals Procedure.

19. Legislation and Review

19.1 This policy has been drafted to comply with the principles of the Human Rights Act. Equality and diversity issues have also been considered to ensure compliance with equality legislation and policies. In additional Data Protection, Freedom of

information and Health and Safety issues have been considered. Adherence to this policy will therefore ensure compliance with all relevant legislation and internal policies.

19.2 This policy is reviewed regularly to ensure it remains up to date and to monitor its effectiveness. Any changes required will be implemented and communicated to our staff.

Policy Statement Information	
Policy Owner (Job Title)	Chief Executive
Date to be Reviewed	October 2028
Date Last Reviewed Completed	October 2026
Effective Commencement Date	November 2012, April 2025
Equality Impact Assessment completed	May 2026
Confirm whether this olicy can be shared on OPCC public facing website to ensure complaince with Specified Information Order.	Publish as relates to contractors and third parties.
Data Protection Impact considerations	Considered and compliant with UK GDPR and Data Protection Act 2018