

Executive Committee Meeting

Wednesday 25 February 2026

Lower Severn IDB Office/Hybrid 10:30am

LOWER SEVERN (2005) INTERNAL DRAINAGE BOARD

TERMS OF REFERENCE OF THE EXECUTIVE COMMITTEE

**Approved 6th November 2024
Minute 3613**

Matters for determination by the Executive Committee

Policy & Guidelines

1. Purpose

The purpose of the Executive Committee is to undertake delegated tasks from the LSIDB Board including for key and immediate decisions from LSIDB's Current Sub Committee's:

The development and implementation of strategy, operational plans, policies, procedures and budgets;

- the monitoring of operating and financial performance of the Revenue Budget;
- the monitoring of operating and financial performance of the Capital Programme;
- the assessment and control of risk;
- the prioritisation and allocation of resources.

2. Membership

The Executive Committee will be made up of 6 members being, the Chair, Vice Chair, Committee Chairs, Programme Board Chair, plus additional member(s) that would be required to make up the full membership. Also, normally the Chief Executive Officer or his/her representative, unless the meeting is deemed part or wholly closed on occasion. Key Officers of the LSIDB will be invited as required. The committee shall appoint a Chair from among its members.

3. Meetings

The Executive Committee should meet on a monthly basis with prepared agendas of items for discussion. A quorum of three Members is required. Officers will be invited as required. The CEO or other LSIDB Officer will act as secretary and take actions of the meetings. The

actions of the meetings will be circulated at the LSIDB's Board Meetings, and the Chief Executive Officer will present a written report after each meeting which will be emailed out to all Board members.

4. Duties

(i) Management

- The successful execution of strategy.
- Recommending objectives and strategy for the LSIDB in the development of the Boards operations.
- Identifying new opportunities, Capital Investment Projects if approved, outside the current core activities.
- Reviewing the organisation structure of the LSIDB and making recommendations for change.
- Implementing policies relating to health and safety, environment, treasury and statutory social responsibility.
- Ensuring the control, co-ordination and monitoring of risk and internal controls.
- Ensuring compliance with relevant legislation and regulations.
- Prosecution, defence or settlement of litigation.
- Ensuring appropriate levels of authority are delegated to LSIDB officers throughout the LSIDB's Annual Planning and delivery of Operations.
- Review of the LSIDB's budgets and five-year plan to the LSIDB's Board and, following their approval, the achievement of the budgets and plans.
- Approval of unbudgeted capital expenditure between £10k and £25k, and the Identification of the necessary funds when making these approvals. Reporting to the Board at the earliest opportunity, per the financial regulations.
- Renewal of banking facilities and arrangements for treasury management per the financial regulations.
- Adherence to other Financial Regulations when authorising procurement, write offs, the sale of assets, appointment of internal auditor, and review/updates.

(iii) Statutory IDB Governance

The Committee shall conduct an annual review of its work and terms of reference and an assessment of its own effectiveness and make recommendations to the LSIDB's Board.

Lower Severn IDB

MISSION STATEMENT

We provide land drainage, flood risk management and surface water management to achieve safe, prosperous communities that enjoy the amenity and biodiversity benefits of the water environment.

Executive Committee

(following joint meeting with the Finance Committee)

Members: Mr M Barnes (Chair), Mr R Godwin, Mr J Hore, Cllr M Riddle (Vice Chair), Mr G Simms

NB The quorum for this meeting is 3 Members

Wednesday 25 February 2026 at 10:30am, IDB Offices/Hybrid

AGENDA

Committees Terms of Reference are included for Members' information

Item		Page No/Doc.	Lead
1.	Apologies/Welcome		Chair
2.	Declaration of Members' Interest		Chair
3.	Minutes of the last committee meeting for approval	5	Chair
4.	Comments on brought forward Exec Actions	10	GT
5.	Management Reports, questions, comments, and updates with JT, JD, GT	Discussion	Chair
6.	Pump Program Report/Update	11	GS
7.	Sexual Harassment policy for support for board approval	13	GT
8.	Any Other/New/Update Item which the Chair/CEO decide is urgent/be mentioned		MB/GT
9.	Confirmation of new Actions		GT
10.	Date of Next Meeting: 18 March 2026		Chair
11.	Close		Chair

- Any other consideration and comments/questions of an urgent nature shall be notified to the office at least 3 working days before the meeting to enable staff to compile the correct information.
- Any Committee Member unable to attend should arrange a deputy and inform the office prior to the relevant Meeting. If the Committee Member chooses, he/she may instead ask the Officers to contact all the other Members, not on the Committee, in order to recruit a deputy for the meeting.

Lower Severn IDB

MISSION STATEMENT

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Draft Executive Committee Minutes

Members: Mr M Barnes (Chair), Mr R Godwin, Mr J Hore, Cllr M Riddle (Vice Chair), Mr G Simms

Wednesday 21 January 2026 IDB Offices

Item	
1.	Apologies/Welcome Present: Matthew Riddle, Geoff Simms, Roger Godwin. James Thomas, Glenn Taute and Jim Druett. MR welcome all to meeting. Apologies were received from Mike Barnes and John Hore
2.	Declaration of Members' Interest RG declared an interest (land use)
3.	Minutes of the last committee meeting for approval Accepted unanimously
4.	Comments on brought forward Exec Actions GT read through previous actions; it was noted that all the actions from previous meetings were completed.
5.	Management Reports JT asked for questions on his report; MR enquired whether JT had an update on de-maining. JT replied that a methodology is being developed; JT will approach EA to ask them what they need LSIDB to do. JT is in correspondence with Martin Quine. JT reiterated that funding requested in December has been approved. Chance that not all funding will be spent but will continue to try. JT reported LSIDB and Jackson's have had a few issues, especially at Wicks Green, which has been resolved. MR asked how the other stations are currently holding up; all fine although there were a few issues at Marshfield which are being addressed. JD read through a summary of his report and added new pipework is working well with the mobile pump and asked for feedback on his report; RG recommended joiners for the pipe, which Andrew is doing. MR thanked JT for the work completed at Tockington and Aust; residents happy. GT announced the retirement of one of LSIDB's Field Operators, Nigel Gardiner. GT is in discussion about phased retirements/ transitions. GS feels this is important to have a handover and the retiring Field Operator has agreed this. GT read through the Financial Report, and said it is important to spend funding before the end of March 2026 so that the unspent grant isn't withdrawn which would

	<p>result in a shortfall. Asked for questions; JT asked after electricity costs as they are high; GT is looking at this once the details are available. The balance sheet remains largely unchanged, with cash balances currently just under £6 million. This is expected to reduce to approximately £3 million by the end of March as expenditure continues, offset in part by the receipt of grant funding. The significant credit balance change regarding creditors relates to pumps being paid for on delivery at Oldbury and Wick Green, with earlier invoices now paid.</p> <p>Glenn confirmed that spend to date on the pump programme is approximately £2.9 million, against a revised approved budget of £10.5 million. Invoices received from Jacksons for November and December are being broken down by Pump Station and component, which is why detailed reporting was not yet available. An action was noted to provide the Board with a more detailed cost breakdown and percentage analysis at a future meeting, to be included in forthcoming reports.</p> <p>New office staff members are settling well after vacancies had been filled.</p>
	<p>6. Pump Program Report/Update</p> <p>GS gave an overview of the discussions on the Programme Board which occurred at the Extraordinary Full Board meeting last week. Reviewed issues around financial contingencies and concerns raised at the previous meeting. GS said finances are clearly auditable on Fastdraft. GS feels that not holding contingencies means the Board needs to keep an oversight of all funds. GS is keen for Board to remain actively engaged with spending, which can be disconnected if there were contingencies; MR and RG voiced support for GS's way of handling the finances and working without contingencies. Board agreed the £10.5m last meeting.</p> <p>All contracted prices for the Pumping Stations have now been received. GS voiced disappointment as various issues were raised at Lapperditch, and said that there has been a change of Jackson's staff. Pleased with the new site manager. A meeting took place on Monday with Jackson's and a discussion was had on how to move forward from unacceptable issues. GS told Jackson's they should be using a reliable system for over-pumping. Over-pumping capacity should be rigged the same or more as the fixed pumps. Concerned over LSIDB's reputation due to the issues created by Jackson's. GS confirmed that instructions have been given to clear silt build-up at to remove pinch points and reduce flood risk. This work will be undertaken using high-pressure jetting due to difficult and unsafe access conditions. GS emphasised the need to act proactively to resolve issues rather than remaining reactive.</p> <p>GS acknowledged that over-pumping has been a significant contributor to recent difficulties and confirmed that the Board must take some accountability for earlier decisions on pump discharge rates. He advised that further internal discussions will take place to ensure lessons are learned and recurring issues are avoided, as these risks could otherwise come to define the project.</p> <p>In relation to funding and spend, GS reported that continued efforts to secure additional funding have been successful. However, he stressed the importance of ensuring that awarded funds are spent in line with programme expectations. While assurances have been received from the contractor that delivery will progress, GS highlighted the need for ongoing proactive management to ensure spend profiles are achieved and that funding is fully utilised, maintaining funder confidence.</p>

	<p>GS also raised concerns regarding the length of the design phase at Oldbury and confirmed that discussions will commence with the contractor to explore opportunities to shorten this phase, enabling construction to progress sooner and reducing the risk of similar delays next winter.</p> <p>GS advised that factory acceptance testing (FAT) of equipment, including telemetry systems, is scheduled for early February. He indicated his intention to attend to ensure systems meet requirements prior to wider rollout.</p> <p>GS provided an update on planning matters at Wick Green, including the completion of a highways survey and minimal associated legal costs, which will be placed on account with solicitors once finalised. RG confirmed that contingency access options exist should planning issues arise, although no significant problems are anticipated. RG asked whether the lack of programme progress at the pumping stations over the previous five weeks, due to over-pumping issues, would delay the programme and risk underspending grant funding before March; GS confirmed that funding is highly itemised and not held as a single flexible sum, and it is not expected that recent delays will affect the ability to spend the allocated funding. A three-week deferral to the survey start date has been agreed to allow recent issues to be addressed; this work remains within the scope of the recently approved £233k funding and is scheduled to be completed by the end of February. Assurance was given that close oversight is being maintained to avoid any risk of returning unspent grant funding. It was also noted that, while compensation events are typically raised by the contractor, a compensation event is now being progressed by the Board in response to recent issues, with formal notification already issued and careful consideration being given to ensure claims are appropriate.</p> <p>The total grant spend required for the current financial year was confirmed as £3.438 million.</p>
	<p>7. Draft Budget 2026/27</p> <p>Glenn Taute presented the draft income and expenditure forecasts, reviewing historical trends for 2024 and 2025, the current year forecast, and the proposed budget for 2027. He noted a significant reduction in grant income of approximately £3.6 million. Rates income is assumed to increase by 4.5%, in line with the position agreed in December, and is expected to remain at this level in future years. On expenditure, GT highlighted a notable increase in payroll costs, explained by the planned ramp-down of programme-related payroll contributions and the extension of the programme timeline. Payroll costs are forecast to increase by approximately 9% in 2027 and 2028 before returning to inflationary increases of around 3.5% thereafter.</p> <p>Maintenance expenditure has been reset to £360k, in line with prior-year budgets, reflecting the need to manage the risk of breakdowns and maintain operational resilience. Professional fees, insurance, and other operational costs were included at levels consistent with prior years, ensuring adequate coverage for legal, technical, and regulatory obligations. The Environment Agency levy increase of 2% has been included in the 2027 figures, consistent with recent announcements.</p> <p>It was noted that the Board has a high proportion of levy funding from local authorities, currently around 92%, which is higher than most Boards nationally. The proposed 4.5% levy increase compares favourably with the 5% increases being</p>

	<p>implemented by many councils and was considered reasonable in the current financial climate.</p> <p>GT also advised that Defra is undertaking a wider review of Drainage Board funding arrangements, including levy and revenue mechanisms, and that the Board's operating model is of interest due to its specific structure and funding mix.</p> <p>A brief discussion took place regarding the potential disposal of redundant pumps. It was agreed that selling non-compliant pumps directly for reuse could present reputational risks, and that disposal via scrap, with appropriate safeguards, would be preferable. No decision was taken at this stage.</p> <p>The committee noted the relatively minor budget amendments presented, which reflect adjustments discussed at the December meeting, and no objections were raised.</p>
<p>8. BCP update for support for board approval</p>	<p>Glenn Taute provided an update on the Business Continuity Plan, highlighting actions from the previous meeting:</p> <ol style="list-style-type: none"> 1. Staff Safety – Immediate checks are being carried out to ensure all staff are safe, accounted for, and in the correct locations. Priority staff lists have been compiled, considering numbers, skills, knowledge, and alternative sources (page 23). 2. Weather Monitoring and Pre-Storm Coordination – Ongoing proactive activity includes monitoring weather watches and holding pre-storm meetings with all relevant stakeholders to ensure coordinated preparation for storms or flooding (page 25). 3. Asset Inventory – A comprehensive asset inventory has been conducted, building on the existing fixed access register. This detailed record, maintained in the site system, supports rapid response during emergencies (page 22). 4. Communication and Contact Registers – Staff contacts have been added alongside member contacts. Jim and Andrew will contact Field Staff, while Glenn will contact office staff to ensure clear lines of communication. 5. Parish Flood Warden Coordination – Every parish has a designated flood warden. A register of flood wardens is being maintained, covering Gloucestershire, Worcestershire, and Hereford, to ensure comprehensive coverage. County and district council records are also referenced where available, supplemented by GRCC data. <p>Glenn requested support from the committee for the proposed plan, which is scheduled for presentation to the board for approval in February. Support was expressed.</p>
<p>9. Board Meeting 4 February Draft Agenda review</p>	<p>GT reviewed the agenda for the upcoming Board meeting on Wednesday 4th February at the Holiday Inn, noting the change of venue from the Farmers Club due</p>

	<p>to availability. The venue is conveniently located near the M5 junction 11A and accessible for all attendees.</p> <p>The Board confirmed the meeting content, including:</p> <ul style="list-style-type: none"> • Approval of previous minutes and short-term committee meeting notes. • Setting rates for the new year and approving the budget, including forecast versus current year and next year, and a five-year projection. • Presentation of the Business Continuity Plan for Board approval. • Programme report.
10.	<p>Any Other/New/Update Item which the Chair/CEO decide is urgent/be mentioned</p> <ul style="list-style-type: none"> • Consideration of involving SWADA in the 3rd June meeting for a morning session, following the success of previous years. • Discussion of the post-commissioning maintenance strategy for pumping stations, including scheduled inspections and potential pull-out regime. Costs and practicalities were noted.
11.	<p>Confirmation of new Actions</p> <ul style="list-style-type: none"> • BCP to include a list of parish flood wardens or other applicable contacts for emergency call-outs. • Electricity bills are high in December 2025, to investigate. • SWADA to be invited to participate in the June meeting.
12.	Date of Next Meeting: 25 February 2026
13.	Close

Number	Created	Action	Assigned	Due	Status	
Executive Committee Actions						
86	03/12/25	Regarding the BCP ensure staff are all safe as part of the immediate response section	GT	Jan-26	Completed	Included in BCP
87	03/12/25	BCP - include weather watch monitoring and hold pre-storm meeting with all stakeholders	SLT	Jan-26	Completed	Included in BCP
87	21/01/26	Electricity bills for December 2025 were high, to investigate.	GT	Jan-26	Completed	Accounts for recent higher rains, but lower than prior year YTD.
88	21/01/26	BCP - add reference to Parash Flood Wardens as a contact re possible flood forecasts	GT	Jan-26	Completed	Included in the BCP
89	21/01/26	Ask SWADA to join the LSIDB June 2026 meeting and site visits	GT	Jan-26	Completed	Awaiting feedback from SWADA

Interim Programme Board Report -15th February 2026

I am making this report to ensure that PB members are up to date with a much changing situation, as is always the case with complex integrated projects. Executive members are copied in as they were directly engaged in the overpumping issues and, for now, this note closes out that matter.

The PB considered all of the issues surrounding the overpumping difficulties and to ensure we are better protected moving forward we have, in agreement with Jackson's, contractually upgraded the arrangements. In addition we have made it very clear that within the contracted, red line areas, of each of the pumping stations the responsibility for construction, operational and safety matters is with the contractor until such times as a formal handover takes place between Jackson's and LSIDB. As an aside we agreed a few weeks delay on the start of Oldbury surveys to ensure that full attention was given to this matter. It does not affect the overall programme timing. There is a meeting every Friday to ensure that the measures are in place and to consider any abnormal weather conditions.

The following items are primarily for the attention of PB members.

The day after the Full Board meeting , 5th February, Jim and I attended the 1st FAT (Factory Acceptance Testing) which was at IMAC in Coventry. It was quite revealing which has resulted in a fair amount of subsequent joint activity to ensure that the specification for electrical and telemetry scope meets our requirements. On the 6th Feb I had a full discussion with Stuart (Jackson's Lead Designer) and on Friday 13th Feb. We met with Jackson's and IMAC to go through in detail, in particular, the specification for the Telemetry arrangements. We will be presented with a design, in the normal way, for our approval. We were assured that this would not have a detrimental impact on the programme and to that end we formally agreed to move our first priority of telemetry from Elmore to Lapperditch. It was on this basis that the FAT on 5th Feb. was , mutually, agreed that we would not signed it off. At this stage a further FAT is proposed for 25th March ish for both electrical and telemetry.

As part of our ongoing strategy a week or so ago I asked James to pursue his EA Grant Funding contact as it appeared other IDB's may be handing back money. The enquiry was positive and there is the possibility of additional funding, the catch being that it must be invoiced by 31st March 2026. We have just got to the point where we have confirmed a spend profile which fully commits our current Grant Finding and meets EA requirements. However on Friday 13th Feb 2026, after our formal meeting, I took the opportunity to speak to Stuart to see if any further spend, against the programme, was feasible. (I indicated a £400-500k number, on the condition that this would be a 100% guaranteed spend.) Stuart agreed to have internal discussions, with his colleagues, and provisionally a meeting has been set up for Tuesday 17th Feb. and any progress to be discussed at PB on 18th Feb. (Please remember how important confidentiality is important in these matters)

The other matter we are pursuing is the overall programme timing and in particular a request, to Jackson's, to look at the current time allocated to overall design, for Oldbury, to ascertain if construction can commence prior to the 'wet' season. In looking at Met. Office data, for our area, there was not a day in January without rain and it continues. The critical part of construction is at the start for excavation and any concrete pours and therefore an early 'dry' start is preferable.

Best regards

Geoff

Ps there are many things sent to try us, the Lapperditch pipework and pumps were due to be installed , commencing this last week. However pipe flange made with wrong number of holes and therefore new one needed to be made!! (Not Jackson's responsibility I might add). Anyone out there with a sense of humour may find it slightly amusing!

DATED: February 2026

SEXUAL HARASSMENT POLICY

1. POLICY STATEMENT

- 1.1 We are committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect. We recognise that sexual harassment can occur both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media.
- 1.2 Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. The law requires employers to take reasonable steps to prevent sexual harassment of their staff during the course of their employment. We will take active steps to help prevent the sexual harassment and victimisation of all staff. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support. Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us or are a third party outside of our control. Sexual harassment and victimisation may result in disciplinary action up to and including dismissal.

2. ABOUT THIS POLICY

- 2.1 The purpose of this policy is to set out a framework for line managers to deal with any sexual harassment that occurs by staff (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.
- 2.2 This policy does not form part of any contract of employment or contract to provide services, and we may amend it at any time.

3. WHO DOES THIS POLICY APPLY TO?

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, apprentices, volunteers and interns. Our obligations and your duties under this policy also extend to job applicants and former employees.

4. WHAT IS SEXUAL HARASSMENT?

- 4.1 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.
- 4.2 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.
- 4.3 Sexual harassment may include, for example:
 - 4.3.1 unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
 - 4.3.2 continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
 - 4.3.3 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);

- 4.3.4 unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); or
- 4.3.5 offensive emails, text messages or social media content.
- 4.4 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 in the workplace.
- 4.5 Victimization includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:
 - 4.5.1 Bringing proceedings under the Equality Act 2010.
 - 4.5.2 Giving evidence or information in connection with proceedings under the Equality Act 2010.
 - 4.5.3 Doing any other thing for the purposes of or in connection with the Equality Act 2010.
 - 4.5.4 Alleging that a person has contravened the Equality Act 2010.
- 4.6 Victimization may include, for example:
 - 4.6.1 Denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment.
 - 4.6.2 Excluding someone because they have raised a grievance about sexual harassment.
 - 4.6.3 Failing to promote someone because they accompanied another staff member to a grievance meeting.
 - 4.6.4 Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.
- 4.7 Sexual harassment and victimization are unlawful and will not be tolerated. They may lead to disciplinary action up to and including dismissal if they are committed:
 - 4.7.1 In a work situation.
 - 4.7.2 During any situation related to work, such as at a social event with colleagues.
 - 4.7.3 Against a colleague or other person connected to us outside of a work situation, including on social media.
 - 4.7.4 Against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.
- 4.8 We 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.
- 4.9 If any sexual harassment or victimization of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. These may include updating relevant policies, providing further staff training and taking disciplinary action against the perpetrator.

- 4.10 Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, unwelcome sexual advances from a client, customer or supplier visiting the employer's premises, or where a person is visiting a client, customer or supplier's premises or other location in the course of their employment.
- 4.11 Third-party sexual harassment can result in legal liability and will not be tolerated. The law requires employers to take reasonable steps to prevent sexual harassment by third parties. Although a member of staff cannot bring a claim for third-party harassment alone, it can still result in legal liability for an employer when raised in other types of claims. All staff are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy.
- 4.12 Any sexual harassment by a member of staff against a third party may lead to disciplinary action up to and including dismissal.
- 4.13 We will take active steps to try to prevent third-party sexual harassment of staff. These may include warning notices to customers or recorded messages at the beginning of telephone calls.
- 4.14 If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. These may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other branches of the business.

5. IF YOU ARE BEING SEXUALLY HARASSED: INFORMAL STEPS

- 5.1 If you are being sexually harassed, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, you should speak to your line manager, or the chair or vice-chair, who can provide confidential advice and assistance in resolving the issue formally or informally. If this does not resolve the issue, you should follow the formal procedure below.
- 5.2 If you are not certain whether an incident or series of incidents amounts to sexual harassment, you should initially contact your line manager, or the chair or vice-chair, informally for confidential advice.
- 5.3 If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below.

6. RAISING A FORMAL COMPLAINT

- 6.1 If you wish to make a formal complaint about sexual harassment, you should submit it in writing to your line manager, or the chair or vice-chair.
- 6.2 Your 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.
- 6.3 If you wish to make a formal complaint about victimisation, you should submit it in writing to your line manager, or the chair or vice-chair.

- 6.4 Your written complaint should set out full details of the conduct in question, including the name of the person or persons you believe have victimised you, the reason you believe you 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.
- 6.5 As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

7. IF YOU WITNESS SEXUAL HARASSMENT OR VICTIMISATION

- 7.1 Staff who witness sexual harassment or victimisation are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:
- 7.1.1 Intervening where you feel able to do so.
 - 7.1.2 Supporting the victim to report it or reporting it on their behalf.
 - 7.1.3 Reporting the incident where you feel there may be a continuing risk if you do not report it.
 - 7.1.4 Co-operating in any investigation into the incident.
- 7.2 All witnesses will be provided with appropriate support and will be protected from victimisation.

8. FORMAL INVESTIGATIONS

- 8.1 We will investigate complaints in a timely, respectful and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it.
- 8.2 We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation.
- 8.3 Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. We will also consider what additional action may be appropriate to protect you and other staff pending the outcome of the investigation. The investigator will also meet with the alleged harasser 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.
- 8.4 Where your complaint is about someone other than an employee, such as a customer, supplier or visitor, we will consider what action may be appropriate to protect you and other staff 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.
- 8.5 We will also consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser.

- 8.6 It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.
- 8.7 At the end of the investigation, the investigator will submit a report to a [senior] manager. The [senior] manager will arrange a meeting with you, usually within a week of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting. A copy of the report and the [senior] manager's findings will be given to you and to the alleged harasser.

9. ACTION FOLLOWING THE INVESTIGATION

- 9.1 If the senior manager considers that there is a case to answer and the harasser is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. Our investigation into your complaint may be put on hold pending the outcome of the Disciplinary Procedure. Where the disciplinary outcome is that sexual harassment occurred, prompt action will be taken to address it. We will also consider what additional measures need to be taken to prevent future sexual harassment of staff. If the harasser is a third party, such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem and prevent a recurrence.
- 9.2 Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation or counselling, or to change the duties, working location or reporting lines of one or both parties.
- 9.3 Any staff member who deliberately provides false information in bad faith, or who otherwise acts in bad faith as part of an investigation, may be subject to action under our Disciplinary Procedure. However, you will not be disciplined or treated detrimentally because your complaint has not been upheld.

10. APPEALS

- 10.1 If you are not satisfied with the outcome you may appeal in writing to a senior manager your full grounds of appeal, within one week of the date on which the decision was sent or given to you.
- 10.2 We will hold an appeal meeting, normally within one week of receiving your written appeal. You have the right to bring a colleague or trade union representative to the meeting.
- 10.3 We will confirm our final decision in writing, usually within one week of the appeal hearing. This is the end of the procedure and there is no further appeal.

11. PROTECTION AND SUPPORT FOR THOSE INVOLVED

- 11.1 Staff who make complaints, report that they have witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.
- 11.2 If you believe you have suffered any such treatment you should inform your line manager, or the chair or vice-chair. If the matter is not remedied, you should raise it formally using our Grievance Procedure or this procedure if appropriate.
- 11.3 We will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation we receive to ensure that they are properly investigated and resolved, those

who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

- 11.4 We offer access to confidential counselling, which is available on request for anyone affected by, or accused of, sexual harassment. This is available through arrangement with the board and with relevant providers.
- 11.5 Support and guidance can also be obtained from the following external services:
 - 11.5.1 The Equality Advisory and Support Service (www.equalityadvisoryservice.com).
 - 11.5.2 Protect (www.protect-advice.org.uk).
 - 11.5.3 Victim support (www.victimsupport.org.uk).
 - 11.5.4 Rape crisis (www.rapecrisis.org.uk).
 - 11.5.5 Rights of women (England and Wales) (www.rightsofwomen.org.uk).
 - 11.5.6 Scottish Women's Rights Centre (Scotland) (www.scottishwomensrightscentre.org.uk).

12. REPORTING OUTCOMES, CONFIDENTIALITY AND RECORD-KEEPING

- 12.1 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.
- 12.2 When appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and any measures put in place to prevent a similar event happening again.
- 12.3 Information about a complaint by or about a staff member may be placed on their 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.
