

Reference:	FOI.20817.26
Subject:	Misconduct data
Date of Request:	24 June 2026

Requested:

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.

Response:

1. Hywel Dda University Health Board (UHB) has applied an exemption under Section 21 of the Freedom of Information Act 2000 (FoIA) as this information is already in the public domain and is accessible by another means. The following policy is available on the UHB's website:

- Policy 1433 - NHS Wales Anti-Sexual Harassment Policy

A link the UHB's policies and written control documents webpage has been provided below:

[Policies and written control documents - Hywel Dda University Health Board](#)

2. The UHB does not hold the requested information. The NHS Wales Anti-Sexual Harassment Policy was produced by the NHS Wales Partnership Forum hosted by Public Health Wales (PHW) which forms part of The NHS Alliance. We therefore recommend you contact the Freedom of Information Team in PHW, who may be able to help you with further with your enquiry. Contact details for PHW are as follows:-

Foi.phw@wales.nhs.uk or alternatively, you can contact: Freedom of Information Office, Public Health Wales, Floor 3, 2 Capital Quarter, Tyndall Street, Cardiff, CF10 4BZ.

3. The UHB does not hold the requested information. However, inspired by the Welsh Ambulance Services University NHS Trust's (WAST) work on Understanding Sexual Safety in the Workplace, alongside changing societal expectations and the significant legislative changes introduced through the Worker Protection (Amendment of Equality Act 2010) Act 2023, the UHB established a Task and Finish Group at the beginning of 2025. The Group was tasked with exploring this important agenda, with a particular focus on fostering a culture of psychological

safety in which colleagues feel confident to speak up, raise concerns and contribute to positive change.

Alongside our local work, NHS Wales progressed the development of a national Anti-sexual Harassment Policy, provided in response to question 1. Both the local and national initiatives undertaken during the past year have provided a strong foundation and valuable insight to inform the next phase of our work.

As a result, we have developed a sexual safety programme of work. Subject to final internal approval, implementation will be led by our newly established Sexual Safety at Work Task and Finish Group, ensuring a coordinated and sustainable approach to creating safer, more respectful and inclusive workplaces across the UHB.

4. The UHB has a dedicated 'Speaking Up in Hywel Dda University Health Board' webpage for staff, which serves as the central repository for information, guidance and resources relating to speaking up within the organisation.

Our developing sexual safety programme of work aligns to multiple speak up pathways, through which staff can raise concerns, including our Work in Confidence (WiC) platform and the Speak Up Guardian function. The WiC platform continues to be actively utilised, whereas face-to-face engagement with Speak Up Guardians remains comparatively underused. This trend suggests that staff place significant value on the anonymity afforded by the WiC platform. Understanding and responding to these preferences will be an important consideration as we continue to strengthen our approach to sexual safety.

The platform is supported by twenty-two (22) active responders, ensuring concerns are managed promptly and effectively. This breadth of responders provides staff with a wide range of options and points of contact when submitting a concern or suggestion.

To support organisational learning and ensure alignment with both national and local priorities, the UHB have recently enhanced the WiC system through the introduction of additional reporting categories, including a specific category for sexual safety. This development will strengthen our ability to capture meaningful data, identify and monitor emerging themes, and target interventions to further develop a safe, respectful and inclusive working environment for all staff.