



**Information Governance Team**

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23 February 2026

Dear Sir/Madam

**Freedom of Information Act 2000 (FOIA)  
Request ID: FOI793743079**

Thank you for your request for information relating to Tackling sexual harassment at work. .

You have requested the following information:

**Please can you provide UNISON with the following information about what steps your council as an employer takes to be proactive and systematic in preventing and tackling sexual harassment at work.**

**1) Does your council have a policy on sexual harassment in the workplace?**

**a. Yes - Please attach a copy of this policy or a copy of a document that includes a policy and procedures on this.**

**b. No – Please explain why?**

Yes. Please find attached a copy of our policy on sexual harassment in the workplace. Please note our Grievance and Dignity at Work Policy and procedure provides guidance to employees on how to raise a complaint if this has not been resolved informally. A copy of this procedure has also been attached.

**2) If you answered yes to question 1, are local authority-maintained schools required to adhere to the same policy?**

**a. Yes**

**b. No**

Yes.

**3) Does your council have training initiatives in place to address and prevent sexual**

**harassment in the workplace?**

**a. Yes - Is the training provided:**

**1. To all employees? Yes/No**

**2. To managers on how to support staff who have reported workplace sexual harassment? Yes/No**

**b. No – Please explain why.**

Yes, the training is open to all employees, managers and elected members.

**4) If you answered yes to question 2:**

**a. Is the training delivered:**

**1. Online**

**2. In person**

**3. Hybrid**

**b. Please provide details about who delivers the training on sexual harassment.**

We confirm there has been a variety of in person and online sessions. These continue to be provided and delivered. The training is provided by the Council's in-house employment law solicitor.

**5) For 2023, 2024 and 2025 calendar years, please provide the number of recorded formal and informal complaints made about sexual harassment allegedly perpetrated by council employees against other employees broken down by:**

**a. Gender of claimant and alleged perpetrator**

**b. The nature of the allegations for example:**

**1. Unwelcome verbal/banter of a sexual nature**

**2. Unwelcome physical advances of a sexual nature.**

**3. Sexual assault**

**c. The number of formal and informal complaints that led to the perpetrator being:**

**1. Given a warning.**

**2. Suspended**

**3. Dismissed**

**4. Other – please state.**

**d. The number of formal and informal complaints that to your knowledge have been referred to:**

**1. The police for criminal investigation?**

**2. The appropriate professional registration body. e, g Social Work England?**

In response to Question 5, we confirm the numbers are too low (under 5) hence disclosure could lead to identification of individuals. Therefore, this information is exempt under section 40 (2) of the FOIA. This exemption covers the personal data of third parties (anyone other than the requester) where complying with the request would breach any of the principles in the Data Protection Act.

This has been done as the Council considers that this information meets the definition for personal data set out in Section 3(2) and 3(3) of the Data Protection Act 2018 (DPA) as:

*(2) personal data means any information relating to an identified or identifiable living individual (subject to subsection (14)(c))”*

*(3) "Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to –*

*(a) an identifier such as a name, an identification number, location data or an online identifier, or  
(b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual."*

Section 40(2) of the FOIA states that personal data relating to third parties (i.e. a party other than the person requesting the information) is exempt information if it is the personal data of a third party (i.e. not yourself ) and one of the conditions in section 40(3A B) or 40(4A) is satisfied.

As the number in response is under 5, this could lead to the identification of employees of Coventry City Council. The disclosure of this information would breach one or more of the Data Protection Principles in the UK General Data Protection Regulation (UK GDPR). The condition at section 40 3A(a) is therefore satisfied because disclosure in this instance would breach the first data protection principle. This is because it would be unfair to disclose such personal data where the employees concerned have no expectation that their names would be released in the context of the information held.

Section 40(2) is an absolute exemption not subject to the Public Interest Test.

The supply of information in response to a FOI/EIR request does not confer an automatic right to re-use the information. You can use any information supplied for the purposes of private study and non commercial research without requiring further permission. Similarly, information supplied can also be re-used for the purposes of news reporting. An exception to this is photographs. Please contact us if you wish to use the information for any other purpose.

For information, we publish a variety of information such as: [FOI/EIR Disclosure Log](#), [Publication Scheme](#), [Facts about Coventry](#) and [Open Data](#) that you may find of useful if you are looking for information in the future.

If you are unhappy with the handling of your request, you can ask us to review our response. Requests for reviews should be submitted within 40 days of the date of receipt of our response to your original request email: [infogov@coventry.gov.uk](mailto:infogov@coventry.gov.uk)

If you are unhappy with the outcome of our review, you can write to the Information Commissioner, who can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or email [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk).

Please remember to quote the reference number above in your response.

Yours faithfully

**Information Governance**