



Sexual Misconduct Policy

Foreword

This Sexual Misconduct Policy (the “Policy”) reflects the ethos of Tottenham Hotspur Football and Athletic Co. Limited (trading as “Tottenham Hotspur Football Club”), its Group Companies, Tottenham Hotspur Foundation (a registered charity known as the “Foundation”) and Tottenham Hotspur Women's Football Club Limited – together the “Club”.

This Policy applies to all Players, Staff, former employees, job applicants, and associated individuals and is relevant to all stages of the employment process. This Policy shall not form part of any contract of employment or contract to provide services.

All Players and Staff under the jurisdiction of the Club agree to abide by all Club policies and procedures as in place from time to time, including this, Policy. Parents, or other persons with parental responsibility for Players aged under 18 (“Minor”) understand and agree, in respect of the Minor for which they have legal responsibility, for the Minor as a Player to be bound by all aspects of this Policy.

Any individual seeking information on the application of this Policy should contact the Club for assistance at hr@tottenhamhotspur.com.

The Club is committed to providing a working environment free from Sexual Misconduct and ensuring all Players and Staff (as defined below) are treated, and treat others, with dignity and respect. The Club recognises that Sexual Misconduct (as defined below) can occur both inside and outside the workplace, such as on business trips. Any instance of Sexual Misconduct by any Player, member of Staff, or anyone they come into contact with during the course of their work will not be tolerated.

This Policy sets out the key principles that the Club adheres to and provides a framework for managing complaints in relation to Sexual Misconduct either raised by Players or Staff or where a Player or Staff member is the alleged perpetrator. This Policy works aligns with the Club’s [Diversity, Equity, and Inclusion Policy](#), as well as the Club’s [Women’s Night Safety Charter action plan](#).

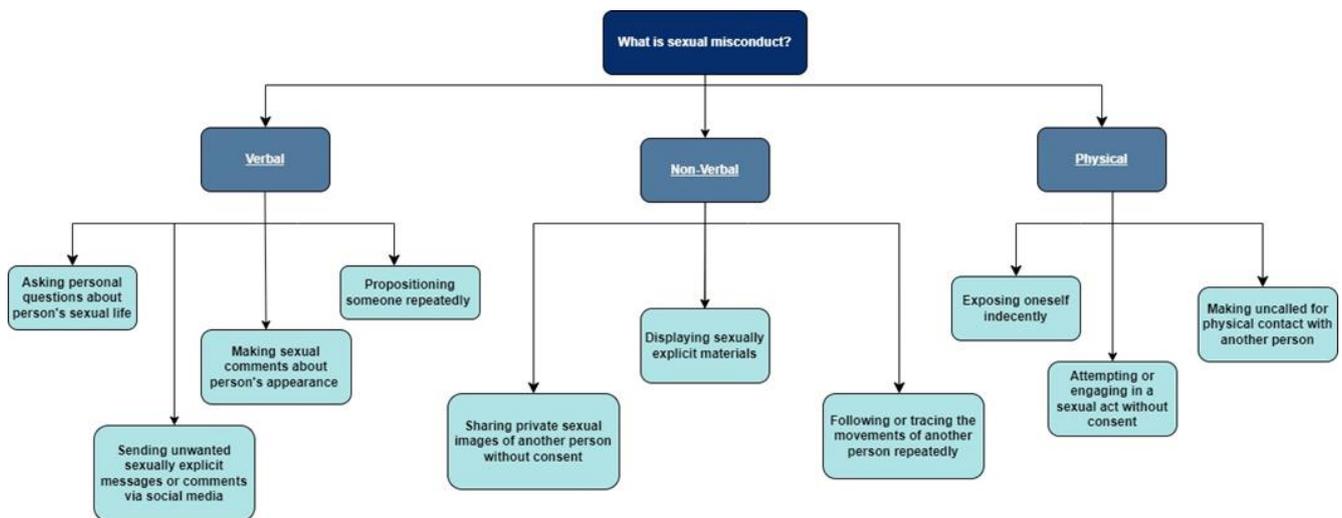
The Club recognises its moral, legal and regulatory responsibility to safeguard and promote the welfare of all Players and Staff. The Club’s approach is underpinned by legislation, statutory and regulatory guidance, compliance with Football Authority Regulations (as defined below) and current best practice work-related events or social functions, or on social media. The Club acknowledges that anyone (including Players and Staff) can be a victim of Sexual Misconduct regardless of sex, gender, gender reassignment, age, ethnicity, socio-economic status, sexuality, or background and that this may have an adverse impact on their working lives.

For as long as Sexual Misconduct exists, the Club shall provide support for all Players and Staff who are victims. The Club is committed to working closely with The Football Association and the Premier League to ensure that high standards are in place across all areas of the Club and that any complaint is taken seriously and responded to swiftly, fairly and appropriately.



The Club undertakes to make available (on request) stakeholders' electronic copies of this Policy as amended from time to time. Electronic copies of this Policy are available on the Shelf. The Shelf will also contain contact details if (i) any individual is unable to download this Policy; and/or (ii) any individual requires this Policy in another form, for example, in large print. All requests will be considered on their merits on a case-by-case basis. In circumstances where an individual has been classified as having intellectual impairment, the Club shall use all reasonable endeavours to communicate the contents of this Policy to such an individual in the most appropriate manner.

What is Sexual Misconduct?



What does the law say about Sexual Misconduct?

The Equality Act 2010, section 26(2) and (3) defines sexual harassment, which is one form of Sexual Misconduct.

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.

It also includes treating someone less favourably because they have previously submitted or refused to submit to unwanted conduct of a sexual nature, or which is related to their gender reassignment or sex.

Examples of sexual harassment include:

- unwanted physical conduct of any kind including touching, grabbing, stroking, massaging and unwanted kissing or hugging;
- continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
- 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);
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as



- harmless); or
- offensive emails, messages or social media content.

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.

Victimisation 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:

- bringing proceedings under the Equality Act 2010;
- giving evidence or information in connection with proceedings under the Equality Act 2010;
- doing any other thing for the purposes of or in connection with the Equality Act 2010; or
- alleging that a person has contravened the Equality Act 2010.

Victimisation may include, for example:

- dismissing someone or denying someone an opportunity because it is suspected that they intend to make a complaint about Sexual Misconduct;
- excluding someone because they have raised a grievance about Sexual Misconduct;
- failing to promote someone because they accompanied another Staff member to a grievance meeting; or
- dismissing someone because they gave evidence on behalf of another Staff member at an employment tribunal hearing.

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.

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. All staff are encouraged to report any third-party harassment that they are a victim of, or witness, in accordance with this Policy.

Some forms of Sexual Misconduct may also constitute criminal offences under a range of legislation, including, but not limited to, the Sexual Offences Act 2003 and the Protection from Harassment Act 1997. Potential criminal offences include sexual assault, rape, stalking or disclosing private sexual images to cause distress ('revenge pornography').

Our commitment to you

We are committed to taking proactive measures to prevent all forms of Sexual Misconduct by:

- Ensuring all new starters receive diversity, equity, and inclusion ("DEI") training, along with specific training on prevention of Sexual Misconduct and reporting as part of their onboarding.
- All Players and Staff are required to undertake mandatory prevention of Sexual Misconduct and DEI awareness sessions, as directed by us from time to time. This training is aimed at ensuring all Players and Staff understand their responsibilities and the standards expected of



them. Refresher training may also be provided periodically to maintain awareness and reinforce best practices.

- Providing additional training for Line Managers so they can recognise, prevent, and appropriately address Sexual Misconduct to support their teams in upholding this Policy.
- Encouraging Players and Staff to participate in workshops, events, and discussions organised by the Club to educate themselves on the importance of preventing Sexual Misconduct and supporting those impacted.
- Reinforcing our zero-tolerance approach to Sexual Misconduct to Players, Staff and third parties who interact with the Club.

We believe that fostering a culture of respect, inclusivity, and equality not only strengthens our Club but also promotes the well-being of Players and Staff. This culture allows everyone to feel safe, be themselves, and belong.

Our commitment is to provide a working environment built on trust, respect, and dignity, free from Sexual Misconduct.

Player and Staff Responsibilities

In addition to the duties and obligations arising under any other contracts or policies under which they may be subject, all Players and Staff shall:

- read, accept and abide by this Policy as well as all other Club policies and procedures as in place from time to time;
- model good behaviour;
- create a safe culture and environment;
- challenge all inappropriate behaviour and report any breaches of this Policy by other Players or Staff; and
- treat everyone equally, with dignity and respect.

If you ever find yourself involved in or aware of any Sexual Misconduct – whether it is happening to you or someone else – we strongly encourage you to speak up without delay and want you to know that we take these issues very seriously. We will act swiftly and appropriately, in line with our disciplinary procedures, and that could mean action up to, and including dismissal.

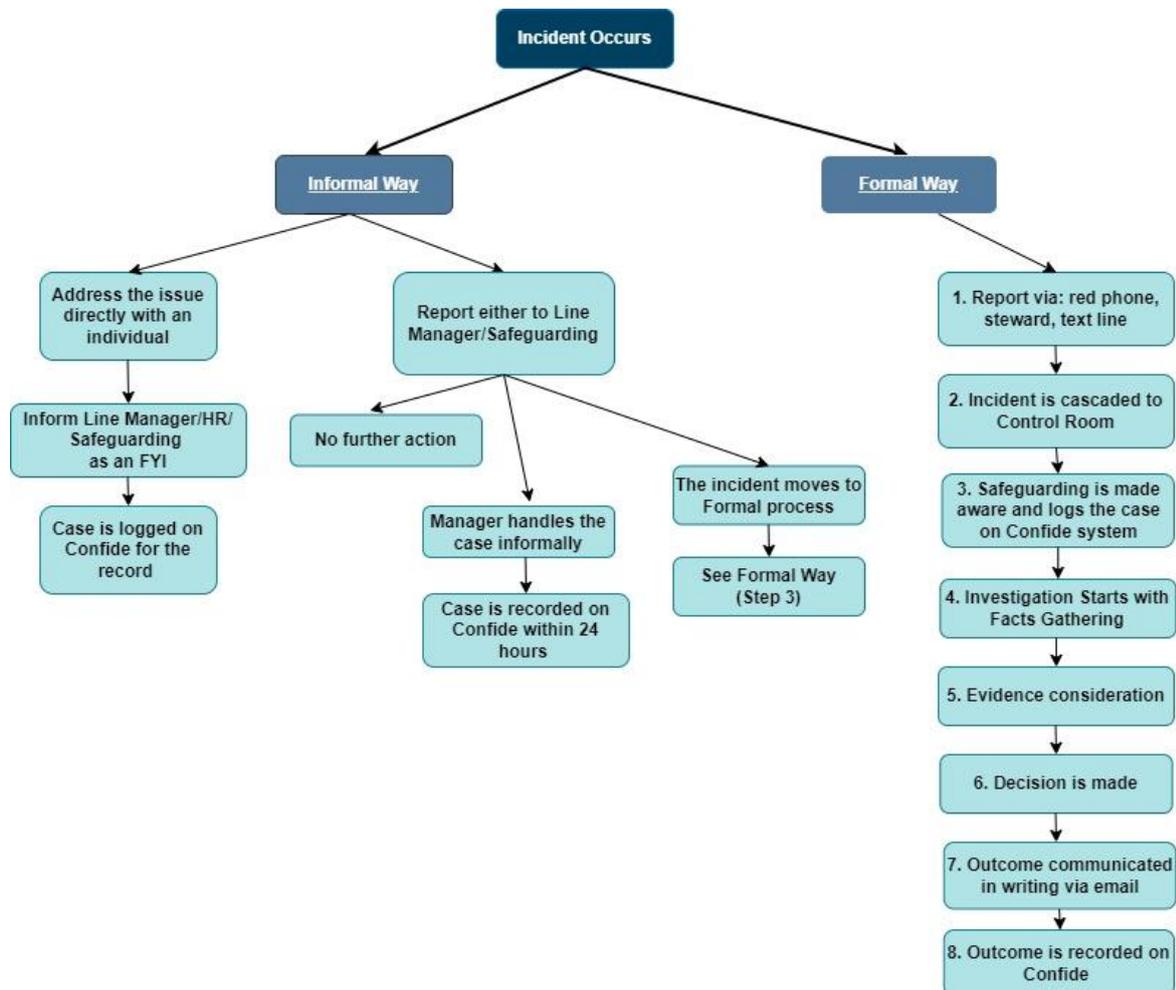
Remember, there is no excuse for Sexual Misconduct. Whether intended or not, if your behaviour makes someone else feel uncomfortable, intimidated, or unsafe, it is unacceptable. It is the impact on the other person that matters, not the intent behind the behaviour. It is the victim of Sexual Misconduct who ultimately decides whether the behaviour is unwanted, even if you consider it to be harmless fun or ‘banter’.

If you witness this type of behaviour, and believe it to be Sexual Misconduct, we strongly encourage you to re-port this in line with this Policy.



What to do if you have experienced Sexual Misconduct?

Match Day



Raising an Informal Complaint

Addressing the Issue Directly:

If you are subjected or exposed to Sexual Misconduct, consider whether you feel able to raise the complaint informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. Sometimes, they may not be aware that their actions are inappropriate, therefore a direct conversation may help to resolve things quickly.

If you are not certain whether an incident or series of incidents amounts to Sexual Misconduct, you should initially contact your Line Manager or Safeguarding informally for confidential advice.

Keeping the Team Informed: Even if you handle the matter directly, we encourage you to let your Line Manager, HR, or the Safeguarding Team know about the incident as an FYI. This keeps the Club informed and ensures a record is made, even if you do not wish to proceed down a formal route.



Seeking Help if You Do Not Want to Address It Directly: If speaking with the individual directly is too difficult, or you would prefer not to, you should speak to your Line Manager or Safeguarding who can provide confidential advice and assistance in resolving the issue formally or informally. If you feel unable to speak to your Line Manager because the complaint concerns them, you should speak informally to another senior colleague or the Safeguarding Team. If this does not resolve the issue, you should follow the formal procedure below.

Deciding Not to Take It Further: If no further action is required or you decide you do not wish to take the matter further, the matter will not be escalated further. It is recommended that you report the incident to the Safeguarding or HR Team so that a confidential record is made.

Manager Handles Case Informally: If an informal resolution is pursued and you want your manager to know about the incident, they will then handle it accordingly. All actions will be logged into the Confide system to ensure transparency and support.

If you do not feel comfortable sharing the incident with your Line Manager, you can let the Safeguarding Team know who will handle the case accordingly.

Moving to Formal Action: If, after talking it through with your manager, HR, or Safeguarding, you decide to take formal action, they will guide you through the next steps in the formal reporting process.

If the complaint relates to an individual under 18: we will inform their parents or other persons with parental responsibility (while ensuring the child's safety) and may also notify the local authority (MASH referral), and the police if needed. This step will be managed by the Safeguarding Manager or Head of Safeguarding.

We have included a case scenario, which can be found in the Appendix - Scenario 1 & 2, for you to get a better understanding and insight into the procedure.

Raising a Formal Complaint

If you are in a situation where you do not feel comfortable addressing an issue yourself, we are here to help. Here's how you can report a complaint formally:

Discreet Reporting: There are 132 red phones situated across the Stadium, that you can use to report the incident. They are located in every core and level of the Stadium and usually placed in isolated areas. You can also speak with a steward or send a message via our text line, which is **only** available on match days. The phone number is: 07537404821. These options will allow you to report the incident discreetly and get assistance immediately.

You will be asked for the full details of the conduct in question, including the name of the harasser, the nature of the Sexual Misconduct, the date(s) and time(s) at which it occurred and the names of any witnesses. If you do not have all of this information, it does not prevent you from raising your complaint and you will be asked to provide as much information as possible.

Escalation to the Control Room: Once you report the incident, it will be escalated to the Control Room, which handles match day safety. They will document the report and make sure the right people are informed to take action.

Notifying Safeguarding and Logging in Confide: The Control Room will alert our Safeguarding Team, who will log the case in to the Confide system. This starts the formal process and ensures everything is



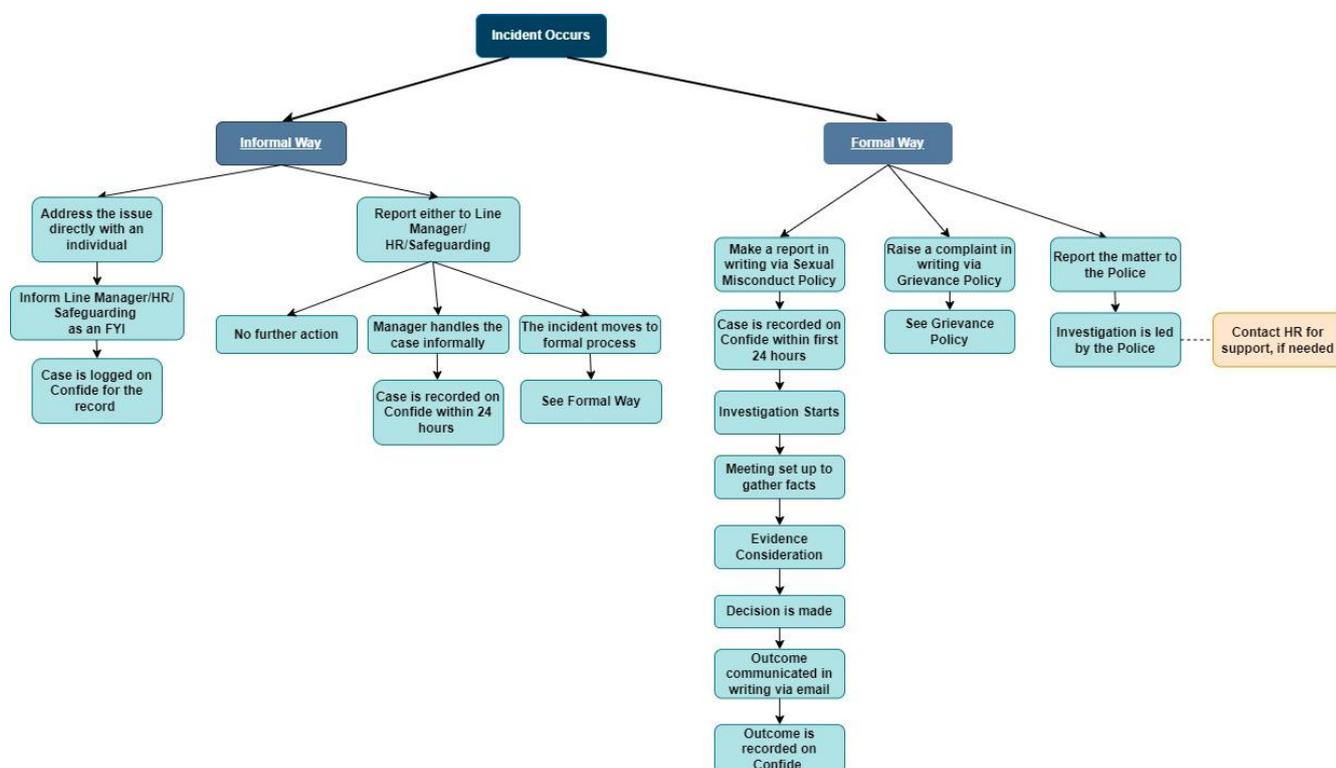
handled securely.

Investigation with Care and Sensitivity: The Safeguarding Team will begin a thorough investigation, gathering facts and reviewing any evidence. They will handle the process with respect and sensitivity, keeping everyone involved in mind.

Clear Communication of the Outcome: Once the investigation is complete, we will follow up with you via email to share the outcome. This gives you a record of the actions taken and reassures you that your concerns have been addressed. The outcome will also be saved in our Confide system for future reference.

We have included a case scenario, which can be found in the Appendix - Scenario 3, for you to get a better understanding and insight into the procedure.

Non-Match Day



Raising an Informal Complaint

Addressing the Issue Directly: Where you are subjected or exposed to Sexual Misconduct, consider whether you feel able to raise the complaint informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. Sometimes, they may not be aware that their actions are inappropriate, therefore a direct conversation may help to resolve things quickly.

If you are not certain whether an incident or series of incidents amounts to Sexual Misconduct, you should initially contact your Line Manager or HR informally for confidential advice.

Keeping the Team Informed: Even if you handle the matter directly, we encourage you to let your Line



Manager, HR, or the Safeguarding Team know about the incident as an FYI. This keeps the Club informed and ensures a record is made, even if you do not wish to proceed down a formal route.

Seeking Help if You Do Not Want to Address It Directly: If speaking with the individual directly is too difficult, or you would prefer not to, you should speak to your Line Manager or HR who can provide confidential advice and assistance in resolving the issue formally or informally. If you feel unable to speak to your Line Manager because the complaint concerns them, you should speak informally to another senior colleague or HR. If this does not resolve the issue, you should follow the formal procedure below.

Deciding Not to Take It Further: If no further action is required or you decide you do not wish to take the matter further, the matter will not be escalated further. It is recommended that you report the incident to the Safeguarding or HR Team so that a confidential record is made.

Manager Handles Case Informally: If an informal resolution is pursued, your manager will handle the case appropriately. All actions will be logged into the Confide system to ensure transparency and support.

Moving to Formal Action: If, after talking it through with your manager, HR, or the Safeguarding Team, you decide to take formal action, they will guide you through the next steps in the formal reporting process.

If the complaint relates to an individual Under 18: we will inform their parents or other persons with parental responsibility (while ensuring the child's safety) and may also notify the local authority (MASH referral), and the police if needed. This step will be managed by the Safeguarding Manager or the Head of Safeguarding.

If the Sexual Misconduct is by a third party:

Sexual Misconduct by third parties (e.g., customers, clients, suppliers, contractors and other third parties) is not tolerated.

If you are experiencing Sexual Misconduct by a third party, we encourage you to report this to your Line Manager, HR or the Safeguarding Team as soon as possible. We will advise and support you on how best to address the issue. If the incident occurs on a matchday, follow the matchday reporting process by notifying your supervisor, a steward, or using the incident text line.

We have included a case scenario, which can be found in the Appendix - Scenario 1 & 3, for you to get a better understanding and insight into the procedure.

Raising a Formal Complaint

If you are not satisfied with the outcome of the informal process, or if you feel that an informal approach is not suitable for your situation, you may choose to raise it formally. You will receive guidance and support to consider the following options:

- ✓ contact HR for further support;
- ✓ report the matter to the police to take over the investigation; and/or
- ✓ make a formal report under this policy.

If you decide to report an incident under this Policy, you have options for how to initiate this process:



- **Formal Report to a Manager, HR or the Safeguarding Team.** We encourage you to speak about the matter with your Line Manager first. If your complaint is about your Line Manager, or you feel unable to speak to them, you can approach the HR or the Safeguarding Team.
- **Raise a Formal Complaint of Sexual Misconduct:** You also have the option to file a formal complaint under the Club's Grievance Policy (as in place from time to time). However, this Policy is designed specifically for handling issues of Sexual Misconduct. You should be aware that you cannot raise a complaint under this Policy if you have raised a complaint about the same issue under the Grievance Policy.

We will ask you to set out your complaint in writing and include as much information as you have about that person. For example:

- ✓ the name, number, email or description of the individual involved in the misconduct;
- ✓ the nature of the sexual misconduct;
- ✓ the dates and locations of the incidents;
- ✓ the names of any witnesses; or
- ✓ any steps you have already taken to address the issue.

Once you have made a report, we will securely log your case into our Confide system within 24 hours. This logging process ensures that your report is documented in a secure, centralised system, allowing us to monitor and track the case throughout the investigation. We will set up a meeting with you as soon as possible to go through it together, offer support and look at any immediate steps we can take to protect you. This might include:

- ✓ creating boundaries between you and the person involved;
- ✓ limiting the accused person's movements around our premises;
- ✓ temporarily suspending the accused; or
- ✓ helping you report the incident to the police, if that is what you would like to do.

If we think the report might indicate a criminal offence, we will consider whether it is appropriate to report the matter to the police. If you choose not to provide a statement to the police, which is your right, this may result in no further action from the police.

Once we receive your statement, we will initiate an investigation which will involve:

- ✓ meeting with the accused person to get their response to the allegations;
- ✓ carrying out further investigations where necessary, which shall involve interviewing potential witnesses who we will instruct to keep the matter confidential;
- ✓ holding a meeting with you to enable us to ask you further questions considering any information we have gathered from the accused individual and/or witnesses.

Once the investigation is complete, we will carefully consider all the evidence in full and make a decision. We will inform you of our decision in writing and, if we uphold the complaint, we may instigate disciplinary action up to and including dismissal against the individual accused of Sexual Misconduct.

Finally, the outcome of the investigation will also be recorded in our Confide system, providing a documented record of the resolution for future reference and ensuring continuity in our support and accountability practices.

We have included a case scenario, which can be found in the Appendix - Scenario 4, for you to get a better understanding and insight on the procedure.



Complaints Relating to High Profile Individuals

Where a Sexual Misconduct complaint relates to a High-Profile Individual such complaint must be referred to the Strategic Safeguarding Lead immediately. The Strategic Safeguarding Lead will then schedule a meeting with the Allegations Management Group to discuss the particulars of the complaint. In these instances, the Managing Allegations Policy will be followed.

If You Witness Sexual Misconduct

Players or Staff who witness Sexual Misconduct are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:

- intervening where you feel able to do so;
- supporting the victim to report it or reporting it on their behalf;
- reporting the incident where you feel there may be a continuing risk if you do not report it; or
- co-operating in any investigation into the incident.

All witnesses will be provided with appropriate support.

Suspension During Investigation

In cases where serious allegations of Sexual Misconduct are made, the Club may decide to suspend the individual accused of Sexual Misconduct while the investigation is ongoing. Suspension is a neutral, precautionary measure and does not imply guilt or wrongdoing. It is intended to allow the investigation to proceed without interference and to ensure the safety and well-being of all parties involved. During the suspension period, the individual will continue to receive their full salary (if applicable) and will be expected to remain available for meetings or further investigation steps. The decision to suspend will be reviewed regularly, and the individual will be informed promptly if the suspension is extended or lifted based on the progress of the investigation.

The Club may monitor an individual's ongoing compliance with the terms of their suspension by any appropriate means.

External Reporting and Safeguarding

If there is a significant risk to others and/or yourself, we have a duty to report to third parties. We may report any allegations of Sexual Misconduct to the relevant football authorities including The Football Association and the Premier League, in line with applicable regulations. The Football Association may choose to conduct an independent investigation and may suspend individuals from football during the process in accordance with the Football Authority Regulations.

We understand that Staff work alongside people from third-party companies. If a concern arises involving someone from a third-party company, it will usually be looked into by their own HR team. However, we are here to support you throughout the process and will work closely with the third-party company to make sure the matter is handled appropriately and sensitively. You should follow the usual process to report Sexual Misconduct if you have been victim to this from a representative of a third-party company.



If you report the incident to the police and it leads to a criminal investigation or court case, we will usually pause our internal investigation. From there, the process will follow the guidance of the police and local authorities. However, in some cases, we might continue with our own investigation, even while the criminal proceedings are ongoing.

The Safeguarding Team will work closely with the police and other agencies to make sure we have all the information we need to make the right decisions on any further actions we might need to take.

If the person involved is convicted or accepts a police caution, we will generally take this as confirmation that the misconduct occurred. In this case, we may decide not to continue our own investigation. However, we can still take appropriate action through our internal procedures if necessary.

Once the criminal process has finished, we may restart our internal investigation if needed. If the police or courts decide not to take further action, we may choose to move forward with our own process. It also does not mean your complaint was false or malicious.

Through all of this, we will make sure you are supported, as well as the person you have reported. We will keep checking in to ensure the support provided is right for both of you, and we will decide if any additional steps, like restarting the investigation, are necessary.

Multiple Allegations of Sexual Misconduct

Sometimes, Sexual Misconduct can involve more than one person or several individuals.

If a group of people come forward with a complaint together, each person must give their consent for their evidence to be included as part of the collective complaint. If someone prefers not to be part of the group, they can still make their own individual complaint.

If your complaint involves several people, we will decide whether to handle it as one investigation or as separate investigations for each person involved, following the [Managing Allegations Against Staff Policy](#).

If multiple people report concerns about the same individual, we will handle each complaint separately. However, to ensure everything is dealt with fairly and consistently, we may oversee all the complaints together. With your consent, evidence from one complaint may be used to support another, if required.

Appeals

If you are not satisfied with the outcome of the formal investigation, you have the right to appeal.

Should you wish to appeal, you should write to HR setting out what aspects of the decision you are unhappy with and the reasons why. Appeals should be submitted without unreasonable delay and usually no longer than five working days after we inform you of the decision.

An appeal hearing manager will be appointed, and they will arrange a meeting with you to discuss your appeal in full and to try and reach a satisfactory solution. You must take all reasonable steps to attend this meeting, and you may be accompanied by a colleague or trade union representative.



The appeal hearing manager will write to you to confirm the outcome of the appeal, which will be final.

Support for those affected or involved

We understand that Players or Staff affected by, or involved with, a complaint of Sexual Misconduct may feel anxious or upset and we will undertake all reasonable endeavours to support those affected.

If you feel you cannot continue to work in close contact with the individual you have reported, we shall take all reasonable steps to accommodate any requested changes to your working arrangements during the investigation and following the conclusion of the matter. For emotional support, you can access free, confidential counselling from our [EAP](#).

Regardless of the outcome of your complaint, we will consider carefully how to best approach any ongoing working relationship between you and the individual concerned, including any third parties. For example, depending on the specific circumstances, we may consider amending the job duties, location or reporting lines of either you or the other person. Alternatively, we may decide whether workplace mediation or counselling is appropriate.

Sensitivity and Confidentiality

Anyone involved in an informal or formal complaint of Sexual Misconduct, including witnesses, must keep the matter strictly confidential and handle it with the utmost sensitivity towards all parties involved.

If you are found to have breached confidentiality or acted without due care or sensitivity in a case of Sexual Misconduct, we may take disciplinary action against you, up to and including dismissal (or other appropriate actions for non-employees).

Consequences of Breaching This Policy

If, following a formal investigation, we find that you have committed, authorised, or condoned an act of Sexual Misconduct, we will deal with the issue as a possible case of misconduct or gross misconduct.

We may take disciplinary action against you, up to and including dismissal (or other appropriate actions for non-employees). You should be aware that any aggravating factors, such as abuse of power over a more junior colleague, will be taken into account in deciding what disciplinary action to take.

Data Protection

All complaints arising under this Policy and all information provided to the Club under this Policy will be dealt with in accordance with the provisions of Data Protection Legislation and the Club's policies as in place from time to time.

So far as is practicable, confidentiality will be maintained at all times in respect of all those involved in any process arising under this Policy unless there is an overriding obligation in the interests of safety for



such information to be shared with other interested parties including but not limited to the police or MASH. Any such information shared shall be on a need-to-know basis only.

The Club will not comment publicly on the specific facts of a pending or decided case (as opposed to general descriptions of the process and science involved) except in response to public comments attributed those involved or their representatives.

Appendix

Scenario 1: Informal Reporting of Sexual Misconduct on Match & Non-Match Days

Addressing the Issue Directly:

Sophie, a staff member at the Club, has noticed that her colleague, Jake, often makes personal comments about her clothing. Sophie feels uncomfortable and decides to address the issue directly. She speaks to Jake privately and expresses his comments make her uncomfortable and asks him to keep things professional.

Jake looks surprised and explains that he did not realise his words had that effect. Sophie clarifies why such remarks are not appropriate in the workplace. Jake apologises, and moving forward, he refrains from making similar comments.

Sophie feels relieved that the issue has been addressed quickly.

Keeping the Team Informed:

Although Sophie resolved the situation with Jake, she decides to inform her Line Manager as an FYI. She sends a brief email explaining the situation, stating that she does not want to take formal action, but wants a record in case of future issues.

Her Line Manager acknowledges the email and logs the information in the system confidentially. This ensures that if similar incidents happen again, there is already a record.

Seeking Help if You Do Not Want to Address It Directly:

Michael, a staff member at the Club, has been experiencing uncomfortable interactions with his supervisor, Chloe. She frequently comments on his appearance and once touched his shoulder in a way that made him uneasy.

Michael does not feel comfortable confronting Chloe, so he reaches out to HR for advice. He explains the situation and asks whether the matter can be handled informally.

HR assures Michael that his concerns are taken seriously and offers to speak with Chloe on his behalf. After a private conversation with HR, Chloe is reminded of appropriate workplace conduct. She acknowledges her mistake and agrees to maintain professional boundaries moving forward. HR goes back to Michael to confirm what action has been taken.

Michael feels reassured that the situation has now been resolved.

Deciding Not to Take It Further:



Sarah, a hospitality team member, experiences an uncomfortable comment from a senior colleague. She discusses it with her Line Manager but decides she does not want to escalate the issue further. Her manager respects her decision and does not record or take further action. However, Sarah is reassured that if she changes her mind later, she can still report it.

Moving to Formal Action

After multiple attempts at resolving the issue informally, Daniel, a finance team member, decides to submit a formal complaint about a senior colleague who has persistently harassed him despite previous warnings.

HR begins an investigation, gathering evidence and witness statements. After reviewing the case, disciplinary action is taken against the senior colleague, and Daniel is provided with ongoing support.

Scenario 2: Formal Reporting of Sexual Misconduct on Match Day

During a packed match day, Jane, a member of the Club's guest services team, encounters a spectator who starts making repeated, inappropriate comments toward her as she is assisting others. Feeling uncomfortable and wanting support, Jane decides to report the incident formally rather than addressing it herself. She discreetly uses the red phone nearby to report the issue, explaining the situation and providing details about the spectator's behaviour.

The report is immediately passed on to the Control Room, where the incident is documented, and the right teams are notified. Shortly after, the Control Room alerts the Safeguarding Team, who logs the case in the Confide system to begin a formal investigation. The Safeguarding Team gathers facts by speaking to nearby colleagues, checking any available footage, and reviewing Jane's account to fully understand the incident.

After the investigation, the Safeguarding Team reaches a decision, which involves removing the spectator from the event and implementing additional security in Jane's work area to prevent further incidents. The team then contacts Jane via email to share the outcome and confirm the actions taken. Jane feels relieved that her report was taken seriously and that the issue was resolved with care and professionalism. Knowing that the incident and the outcome is also recorded in the Confide system gives her added reassurance that support will be there if she ever needs it again.

Scenario 3: Formal Reporting of Sexual Misconduct on Non-Match Day

Anna, a team member at the Club, has been receiving inappropriate comments and attention from her colleague, Jake. After addressing the issue directly with him, his behaviour continues, prompting Anna to report the situation in a formal way.

Anna is given three options for how to proceed:

- She can either report the matter to the police. If Anna chooses this option, HR will assist her in making the report and ensure that any evidence or documentation needed for the police investigation is available. The police will then lead the investigation and make decisions regarding any legal consequences.
- Raise a complaint via the Grievance Policy. If Anna feels the issue is related to workplace conduct but does not require legal action, she can raise a formal complaint under the Club's Grievance Policy. HR will investigate the complaint, accordingly, ensuring Anna's concerns are



addressed and a resolution is found, such as mediation, work adjustments, or other solutions, without involving disciplinary action.

- If Anna decides to proceed with the Sexual Misconduct Policy, she can write a detailed report about the incidents. HR will record the case in the Confide system and will schedule a confidential meeting with Anna to discuss her options and any protective measures. The Club will appoint an investigating manager who will then investigate the situation by meeting with both Anna and Jake, as well as interviewing any witnesses. Once all the evidence is reviewed, the investigating manager will determine if Jake's behaviour violated the Policy. If a violation is found, appropriate disciplinary actions, such a warning or dismissal, may follow. Anna will be notified of the decision via email, and the outcome will be logged in the Confide system to maintain a record.

Definitions and Rules of Interpretation

The following definitions apply in this Policy:

Data Protection Legislation:	all applicable laws relating to data protection, the processing of personal data and privacy, including: the Retained EU law version of the General Data Protection Regulation ((EU) (2016/679)) (“ UK GDPR ”) and the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications), and any other data protection and/or privacy legislation applicable in the UK from time to time, (each as amended, updated, replaced or re-enacted from time to time and including all subordinate legislation made from time to time under or giving effect to the same) and references to “controller”, “personal data”, “special category data”, “process”, “processing” and “supervisory authority” have the meanings set out in, and will be interpreted in accordance with, such applicable laws;
Football Authority Regulations:	the rules and regulations from time to time in force under the auspices of The Football Association and/or the Premier League to the extent that they relate or apply to the Club;
High Profile Individuals	Players, former Players, Club "legends", Club shareholders, the Club's statutory directors, senior leadership team, senior executives, senior football leads (e.g., the manager of the men's first team) and those with associated and/or engaged by the Club who are well known in the public domain and have “celebrity” status;
Players:	means all Club players in the men's senior first team, the women's senior first team, the academy and the women's academy;
Premier League:	football's highest recognised professional league in England;
Sexual Misconduct:	is a range of behaviours including sexual assault, sexual abuse, sexual exploitation, sexual harassment, stalking, voyeurism and any other conduct of a sexual nature that is non-consensual or has



the purpose or effect of threatening, intimidating, undermining, humiliating or coercing a person;

Staff:

any individual acting for or on behalf of the Club in an official role whether as an officer, employee, staff, volunteer, agency workers, casual workers, self-employed contractors, consultants, interns, apprentices or otherwise; and

The Football Association:

the national governing body of football in England.