



ORKNEY
ISLANDS COUNCIL

Item: 3

Human Resources Sub-committee: 1 September 2026.

Bullying, Harassment and Discrimination Policy.

Report by Director of Infrastructure and Organisational Development.

1. Overview

- 1.1. The report presents the Bullying, Harassment and Discrimination Policy, for members' approval.
- 1.2. The Council's former Dignity at Work Policy has been reviewed and updated as part of the ongoing programme of policy modernisation and the Council's commitment to the Equally Safe at Work accreditation programme.
- 1.3. Following this review, it is proposed that the content previously contained within the Dignity at Work Policy is replaced by two standalone policies: the Bullying, Harassment and Discrimination Policy and the Sexual Harassment Policy. The policies support the Council's commitment to employee wellbeing, equality, inclusion and align with Scotland's Equally Safe Strategy.
- 1.4. The review identified an opportunity to improve clarity and accessibility for employees by separating guidance relating to bullying, harassment and discrimination from guidance specifically relating to sexual harassment. Whilst sexual harassment is a form of harassment, the Council's Equally Safe at Work journey identified the benefits of a dedicated policy that provides enhanced guidance on prevention, awareness, support and reporting arrangements.
- 1.5. Together, the two policies form the Council's revised Dignity at Work framework and reinforce its commitment to providing a workplace where all employees are treated with dignity, respect and fairness. The revised policies:
 - i. Reaffirm the Council's zero-tolerance approach to bullying, harassment, discrimination and sexual harassment.
 - ii. Clearly define unacceptable behaviours and employee responsibilities.
 - iii. Strengthen guidance on reporting concerns and accessing support.
 - iv. Clarify informal and formal resolution processes.
 - v. Reflect current legislation and best practice.

- 1.6. Approval of the policies will enable the Council to implement a more focused and accessible approach to supporting employees, preventing inappropriate workplace behaviour and promoting a respectful and inclusive culture.

2. Recommendations

- 2.1. It is recommended that members of the Sub-committee:
 - i. Approve the Bullying, Harassment and Discrimination Policy, attached as Appendix 1 to this report.

3. Consultation

- 3.1. The draft policies have been developed by Human Resources and Organisational Development and informed by best practice, Equally Safe at Work principles and consultation with relevant stakeholders including recognised Trade Unions. Feedback received during development has been incorporated into the final draft policies where appropriate.

For Further Information please contact:

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Implications of Report

1. **Financial** – There are no significant direct financial implications arising from adoption of this policy. However, implementation may result in limited costs associated with staff training, investigations, management and HR support, workplace adjustments and employee wellbeing measures. Any such costs are expected to be managed within existing service budgets
2. **Legal** – Adoption of the Bullying, Harassment and Discrimination Policy will support the Council's compliance with its employment law and equality obligations.
3. **Corporate Governance** – Not applicable.
4. **Human Resources** – HR implications are covered within the body of the report.
5. **Equalities** – An Equality Impact Assessment has been carried out and is attached as Appendix 2 to this report.
6. **Island Communities Impact** - As this policy is unlikely to have an effect on an island community which is significantly different from its effect on other communities (including other island communities) within Orkney, a full Island Communities Impact Assessment has not been undertaken.

- 7. Links to Council Plan:** The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Council Plan strategic priorities:
- ☐ Growing our economy.
 - ☐ Strengthening our communities.
 - ☐ Developing our Infrastructure.
 - ☒ Transforming our Council.
- 8. Links to Local Outcomes Improvement Plan:** The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Local Outcomes Improvement Plan priorities:
- ☐ Cost of Living.
 - ☐ Sustainable Development.
 - ☒ Local Equality.
 - ☐ Improving Population Health.
- 9. Environmental and Climate Risk** – Not applicable.
- 10. Risk** – Not applicable.
- 11. Procurement** – Not applicable.
- 12. Health and Safety** – None arising directly from this report.
- 13. Property and Assets** – Not applicable.
- 14. Information Technology** – Not applicable.
- 15. Cost of Living** – Not applicable.

List of Background Papers

[Dignity at Work Policy](#)

Appendices

Appendix 1 – Bullying, Harassment and Discrimination Policy.

Appendix 2 – Equality Impact Assessment - Bullying, Harassment and Discrimination Policy.

Bullying, Harassment and Discrimination Policy

Prevention, Awareness and Support

Prepared by HR and Organisational Development

Document Control Sheet

Review / approval history.

Date.	Name.	Position.	Version Approved.
TBC	General Meeting of the Council	N/A	

Change Record Table.

Date.	Author.	Version.	Status.	Reason.
Next scheduled review in xxxx.				

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Introduction

At Orkney Islands Council, we are committed to creating a workplace where everyone feels safe, respected and valued. We take concerns about bullying, harassment and discrimination seriously and are committed to addressing them appropriately.

We recognise that experiencing inappropriate behaviour can have an impact on a person's emotional, physical and mental wellbeing. No one should feel uncomfortable, excluded or unsafe at work. That's why we take all concerns seriously and are committed to responding fairly, consistently and with compassion.

This policy supports our wider commitment to dignity at work. It sets out how we expect everyone to behave, what support is available, and how we will respond to concerns raised, ensuring that Orkney Islands Council remains a place where everyone can feel supported.

What to expect from this policy

This policy aims to explain:

- How we expect our colleagues to behave.
- What we mean by zero tolerance.
- What to do if you see or experience inappropriate behaviour.
- How we can all help to create a respectful working environment.
- How to access impartial support whether you are experiencing inappropriate behaviour, you have been accused, or you are supporting a colleague.

We all have a responsibility to create a culture where bullying, harassment and discrimination doesn't happen, and to challenge or report it if we see it happening.

Because we take these behaviours seriously, if we find you've bullied, harassed or discriminated against someone, made false allegations, or treated a colleague badly because they've raised a legitimate concern, we regard this as potential gross misconduct, and you may be dismissed using the disciplinary policy.

If you're a manager and want to know more about how to help a colleague, you can read our guide for managers.

Who this policy is for

This policy applies to all employees of Orkney Islands Council, whether you're in a permanent or temporary role. It covers colleagues employed under Scottish Joint Council (SJC), Scottish Negotiating Committee for Teachers (SNCT), UHI Orkney Academic (NJNC), and Chief Officials terms and conditions.

What is bullying?

Bullying can be described as unwanted behaviour from a person or group that is either:

- offensive, intimidating, malicious or insulting
- an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.

The bullying might:

- be a regular pattern of behaviour or a one-off incident.
- happen face-to-face, on social media, in emails or calls.
- happen at work or in other work-related locations.
- not always be obvious or noticed by others.

Examples of bullying at work could include:

- someone has spread a malicious rumour.
- a manager keeps giving you a heavier workload than everyone else.
- someone keeps putting you down in meetings.
- someone holding back information or deliberately 'losing' information.
- being excluded from team social events.
- someone has put humiliating, offensive or threatening comments or photos on social media.
- someone at the same or more junior level as you, keeps undermining your authority.

Bullying is not:

- Being held accountable for your performance or behaviour.
- Constructive feedback.
- Conflict or difference of opinions.

Upward bullying

Upward bullying is when a colleague bullies a more senior colleague or manager.

It can be from one colleague or a group of colleagues. Examples of upward bullying can include:

- showing continued disrespect.
- refusing to complete tasks.
- spreading rumours.
- doing things to make you seem unskilled or unable to do your job properly.

It can be difficult if you're in a senior role to realise you're experiencing bullying behaviour from your colleagues. However, a senior position does not make you immune to the impact and effects of bullying, and we would take any allegations just as seriously as any other.

What is harassment?

Harassment is when bullying or unwanted behaviour is about or because of any of the following protected characteristics under discrimination law (Equality Act 2010):

- Sex.
- Disability.
- Age.
- Race and ethnic or national origin.
- Sexual orientation.
- Gender reassignment.
- Religion or belief.

It includes unwanted conduct that is sexual in nature and treating someone badly because they either rejected it or because they went along with it. You can find out more about this in our Sexual Harassment Policy - Prevention, Awareness and Support.

Harassment and the law

Harassment is unlawful under the Equality Act 2010. If someone's behaviour is unwanted and causes offence, even if it wasn't done on purpose, it may be harassment. The unwanted behaviour doesn't have to be aimed at you for you to be offended by it. If it creates an intimidating or offensive environment for you or anyone else, then it could be harassment.

Examples of harassment at work could include:

- Sexually suggestive jokes, comments or innuendo, offensive gestures or whistling.
- Unnecessary touching.
- Suggestions that sexual favours may further someone's career, or that refusing them may damage it.
- Offensive remarks about a group's or an individual's race, ethnic or national origin.
- Outing a colleague as trans or non-binary without their permission.
- Repeatedly using the wrong pronouns or name for someone who is trans or non-binary, despite having the correct information.
- Ridicule or assumptions based on racial stereotypes.
- Spreading rumours or gossip about someone's sexual orientation or gender.
- Making jokes or offensive remarks about someone's disability.
- Excluding someone because of their political opinion or religious group.

Harassment can be:

- A serious one-off incident.
- Repeated behaviours.
- Spoken or written words, imagery, graffiti, gestures, mimicry, jokes, pranks or physical behaviour that affects the person.

It's still against the law even if the person being harassed does not ask for it to stop.

Harassment because of pregnancy or maternity is treated differently under the discrimination law but is still unlawful under the prohibition of direct sex discrimination.

Also, whilst the law on harassment doesn't cover marriage and civil partnership, harassment because of marriage/civil partnership, is still unlawful under the prohibition of direct discrimination.

What we mean by zero tolerance

At Orkney Islands Council, Zero Tolerance means we will not ignore or minimise bullying, harassment or discrimination in any form. We take every concern seriously, whether raised informally or formally, and we are committed to responding fairly, using unbiased judgement and in line with our policies and values.

Where concerns are escalated formally, they will be thoroughly investigated through the disciplinary procedure, and appropriate outcomes will follow. Where concerns are proven, outcomes may include formal warnings, training, reassignment of duties (where appropriate), or dismissal, depending on the nature and severity of the behaviour.

Malicious complaints will also not be tolerated. Where proven, they will be addressed in line with our policies, including potential disciplinary action.

Zero tolerance does not mean dismissal in every case. It means we are committed to acting in a way that best fits the situation, supported by a fair and thorough process that considers the specific circumstances of each case.

What is discrimination?

By law, being discriminated against is when you are treated unfairly because of any of the following:

- Age.
- Disability.
- Gender reassignment.
- Marriage or civil partnership.
- Pregnancy or maternity.
- Race.
- Religion or belief.
- Sex.
- Sexual orientation.

These are known as 'protected characteristics'. It's against the law for anyone to treat you less favourably because of them.

Examples of direct discrimination at work could be:

- Someone is not offered a promotion because they're a woman and the job goes to a less qualified man.
- A close friend of a colleague has surgery to change their sex. Some colleagues find out about the surgery and stop inviting them to social events.

Victimisation

The law also protects you against victimisation, which means being treated badly because you have, plan to, or are thought to have:

- Brought an employment tribunal claim alleging discrimination.
- Complained about discrimination.
- Given evidence or information in relation to someone else's claim about discrimination.

Getting advice and support

If you feel that you're being bullied, harassed, or discriminated against, it can sometimes be difficult to decide how you want to deal with it. It can help to talk this through with someone. We would always suggest that you speak to your manager initially to talk things through.

If you don't feel like you can speak to your manager, remember we have a network of [Wellbeing Champions](#) who you can speak to, or if you're a member of a trade union, you can also contact them for advice.

Our **Employee Assistance Programme** offers direct and confidential support to all employees. This includes 24/7 access to telephone counselling, every day of the year. You can speak to a qualified counsellor by calling 0808 168 2143, or you can access support online through [Optima Health EAP](#) using the login details below:

Username: OIC001

Password: Wellbeing365!

If you have witnessed bullying, harassment or discrimination it's best not to stay silent. If you can, speak to the person to whom the negative behaviour is directed towards and ask them what support they need.

Resolving things informally

It's generally better to try to sort things out informally if possible. Explaining to the person responsible how it makes you feel and asking them to stop may get things resolved. They might not have meant to offend you or realise the impact of their words or actions.

But if you don't feel able to speak to the person, talk to your manager about the problems you're having. If it's appropriate, your manager may speak to them confidentially to say that their behaviour is inappropriate and needs to change. Wherever possible your manager will aim to resolve things quickly and informally without the need to use a formal process. Dealing with things informally is often much less stressful and quicker for everyone involved than a formal process.

Sometimes, your manager may decide that the nature of the complaint is such that it needs to be considered formally, for example if the complaint is very serious or where the informal approach would not be appropriate.

If you don't feel you can speak to your manager, or your complaint is about them, you can speak informally to your manager's line manager. There may be other people you feel comfortable speaking to, such as another manager, [Wellbeing Champion](#), or your trade union if you're a member - or you can make a formal complaint.

Making a formal complaint

If you do not feel able to resolve the issue informally, you can raise a formal complaint. To do this, you should set out your concerns in writing and share them with your manager. If your complaint is about your manager, you can send it to their manager instead. We will consider your complaint as quickly and fairly as possible, and an appropriate manager will be appointed to review the concerns and decide what action is needed.

If you are not satisfied with the outcome, you may appeal the decision. Appeals must be submitted in writing and should be sent to a more senior manager than the one who made the original decision. Appeals will be considered at the lowest appropriate level of management, but as a minimum will be reviewed by a Service Manager. The appeal decision is final, and there is no further right of appeal or access to any other grievance process for the same matter.

We know it's not an easy thing to do to speak up about these things, so we'll investigate this as quickly as possible. If we find evidence, we'll take appropriate action against those involved.

Support and protection for colleagues

If you raise a concern in good faith, or you've witnessed bullying, harassment or discrimination at work, we'll give you support. We won't allow you to suffer negative treatment in your employment because of it.

Also, if you've been accused of bullying, harassment or discrimination and we find this is untrue, we won't allow you to suffer negative treatment in your employment because of it. We'll also give you support if you need it.

Getting emotional support

We know that experiencing inappropriate behaviour can make working life miserable and take an emotional, physical, and mental toll on our colleagues. We also know that it can be helpful to be able to get confidential emotional support from someone impartial and from outside any formal process.

If you are experiencing bullying, harassment, or discrimination, have been accused or are supporting a colleague and you need support or someone to talk to, remember our **Employee Assistance Programme** offers direct and confidential support to all employees. This includes 24/7 access to free and confidential telephone counselling, every day of the year. You can speak to a qualified counsellor by calling **0808 168 2143**, or you can access support online through [Optima Health EAP](#) using the login details below:

Username: OIC001

Password: Wellbeing365!

Performance management

Bullying isn't the same as managing someone's performance. If your manager is giving you work to do or managing your performance using an informal or formal process, and they're doing that in a professional and supportive way, this won't on its own be considered bullying.

But if you do feel that your manager's behaviour towards you is unacceptable, talk to them about it. If you feel like you can't do this, there are other ways you can [raise your concerns](#).

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Other situations to be aware of

Remember, you're responsible for your own behaviour while at work, any time you're representing Orkney Islands Council outside of the workplace or at any work-related event. We're all expected to be respectful and considerate of other people and our individual differences. For more information take a look at our Equality Statement.

Behaviour outside work

If you experience unwanted or offensive behaviour that happens outside of the workplace but still to do with your work, like at a work-related social event or training course, tell your manager. They'll investigate and deal with it in line with this policy.

Social media

If you put potentially offensive or inappropriate comments or images about, or directed at colleagues, customers or service users on social media sites, we'll take this very seriously and investigate it in line with the social media policy.

Behaviour of customers or external parties

If you experience or see inappropriate behaviour by customers or third-party contractors in your workplace, it's really important you don't feel like you just have to put up with it. Incidents of inappropriate behaviour should not be tolerated.

If you have experienced this type of unacceptable behaviour:

- You should report it to your manager as soon as you feel able to.
- Your manager will notify the relevant teams to ensure you receive the right support and advice.
- We will take steps to protect your safety and wellbeing, including reviewing working arrangements and addressing the behaviour directly with the third party where appropriate.

You have the right to feel safe and respected at work no matter who you're interacting with. If you're unsure what to do, speak to your manager or HR for guidance and support. The Council has policy guidance on Unacceptable Behaviour by Customers or Service Users, and this may also be a relevant document to consult.

If you need further support

If you have any questions about bullying, harassment or discrimination or have experienced inappropriate behaviour or unfair treatment, then speak to your manager or another manager. If you feel that you can't speak to your manager, then you can contact their manager, HR and OD, your Trade Union if you are a member, or one of the [Wellbeing Champions](#).

Related policies

Bullying, harassment and discrimination can intersect with other forms of unacceptable behaviour in the workplace, including domestic abuse and gender-based violence.

If you are experiencing behaviour that undermines your dignity at work, you may also find support through our **Supporting colleagues experiencing Gender-Based Violence (including Domestic Abuse) and Sexual Harassment Policy - Prevention, Awareness and Support**. These policies outline our commitment to fostering a respectful, inclusive, and safe working environment for all colleagues.

These two policies work alongside this policy to ensure that all employees are protected from harm and are supported in raising concerns. If you're unsure which policy applies to your situation, please speak to your manager, to HR, your Trade Union representative or to one of our [Wellbeing Champions](#).

Review and monitoring

This policy will be reviewed by Human Resources in conjunction with recognised Trade Unions in line with the Council's schedule for reviewing all Human Resources policies and procedures, normally every five years.

Where changes to employment law, best practice recommendations, or schemes of Conditions of Service require, a review may be undertaken within this timescale by agreement with the Head of Human Resources and Organisational Development.

Where provisions differ for teaching or other employee groups, this will be identified separately within the policy.



Equality Impact Assessment

The purpose of an Equality Impact Assessment (EqIA) is to improve the work of Orkney Islands Council by making sure it promotes equality and does not discriminate. This assessment records the likely impact of any changes to a proposal or changes by anticipating the consequences and making sure that any negative impacts are eliminated or minimised and positive impacts are maximised.

Should you have any questions or wish for your draft EqIA to be reviewed by our Equality, Diversity and Inclusion Adviser, please contact OD@orkney.gov.uk.

1. Identification of the Proposal or Change

Name of proposal or change being assessed.	Bullying, Harassment and Discrimination (BHD) Policy – to replace the Dignity at Work Policy
Responsible Service and Directorate.	HR and OD, Infrastructure and Organisational Development
Date of assessment.	February 2026
Is the proposal or change existing? (Please indicate if the service is to be deleted, reduced or changed significantly).	Revision of existing policy: replacing Dignity at Work with a comprehensive Bullying, Harassment and Discrimination policy.

2. Primary Information

What are the intended outcomes of the proposal or change?	The intended outcome is to replace the 2016 Dignity at Work Policy with a clearer and more robust Bullying, Harassment and Discrimination Policy that reflects current best practice. The revised policy aims to provide consistent, accessible definitions and examples of bullying, harassment, discrimination and victimisation, alongside clear routes for seeking help, from early-resolution approaches such as supported conversations and mediation to a fair and transparent formal process where needed. It also strengthens protections against inappropriate behaviour from third parties, including customers and contractors, and addresses modern risks such as the misuse of social media in workplace interactions.
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	Overall, the policy seeks to reinforce a culture of zero tolerance for proven bullying and harassment while ensuring fairness and safeguards against malicious or vexatious complaints, with support available to everyone involved. It further intends to improve accessibility by using plain language, offering multiple reporting channels, making reasonable adjustments where required, and enhancing monitoring and organisational learning so the Council can continuously improve how it prevents, identifies and responds to inappropriate behaviour.
Is the proposal or change strategically important?	Strategic plans include major investment plans, new strategic frameworks or plans such as annual budgets, locality plans or corporate plans. Where a proposal is identified as strategic, evidence relating to socio-economic impacts and inequalities will be required in the relevant section No
State who is or may be affected by this proposal or change, and how?	All OIC employees including agency workers.
How have stakeholders been involved in the development of this proposal or change?	Initial development with the Equally Safe at Work Working Group (feedback used to shape the draft), then further engagement with Trade Unions and HR Operations
Is there any existing data and / or research relating to equalities issues in this policy area? Please summarise. E.g. consultations, national surveys, performance data, complaints, service user feedback, academic / consultants' reports, benchmarking.	Evidence from national NHS Scotland Workforce Bullying and Harassment policy and supporting guidance (early resolution, mediation, scope); local authority policies (Edinburgh, Glasgow, Highland) emphasising zero tolerance, clear roles and third-party harassment; NHS Staff Governance Dignity at Work Toolkit on culture change; EHRC PSED guidance on assessing impact. See sources listed below. 1. NHS Scotland Workforce Policies – Bullying and Harassment Policy (updated Mar 2024), policy and supporting guidance on early resolution, mediation, scope covering employees, workers and volunteers. Bullying and Harassment Policy Overview NHS Scotland 2. Local Authorities a) City of Edinburgh Council – Avoidance of Bullying and Harassment at Work Policy (2015) – clear definitions, responsibilities and third-party behaviour. Notice of meeting and agenda

	b) Glasgow City Council – Bullying and Harassment Policy (2024) – zero-tolerance statement, third-party harassment and social media coverage. 20241026 Bullying Harassment Policy V3.0.FINAL 002.pdf c) Highland Council – Bullying and Harassment at Work Policy and Guidance (2024) – roles incl. contacts, mediation, and reporting pathways. Highland Council Policy 3. Culture Change resources: a) NHS Staff Governance – Dignity at Work Toolkit – building blocks for respectful culture and tackling bullying. (staffgovernance.scot.nhs.uk/.../dignity-at-work-toolkit/) 4. Equality Impact best practice and the Fairer Scotland Duty. a) EHRC (Scotland) – Assessing impact and the Public Sector Equality Duty – 8-step guide (2020). Assessing impact and the equality duty: an eight step guide EHRC b) Fairer Scotland Duty Guidance (Scottish Government) – considering socio-economic disadvantage in strategic decisions. Fairer Scotland Duty: guidance for public bodies - gov.scot
Is there any existing evidence relating to socio-economic disadvantage and inequalities of outcome in this policy area? Please summarise. E.g. For people living in poverty or for people of low income. See The Fairer Scotland Duty Guidance for Public Bodies for further information.	The proposal is a strategic policy change. Evidence under the Fairer Scotland Duty indicates that people experiencing socio-economic disadvantage (e.g. lower-paid, shift or temporary workers) can face higher risks of bullying, reduced voice, and barriers to reporting. Mitigations in the policy include multiple reporting routes, right to representation, trauma-informed signposting to the Employee Assistance Programme, and reasonable adjustments; monitoring will include grade, contract type and location to identify any disproportionate patterns.

Could the proposal or change have a differential impact on any of the following equality areas?	Please provide any evidence – positive impacts / benefits, negative impacts and reasons:
1. Race: this includes ethnic or national groups, colour and nationality.	Potential positive: explicit coverage of racial harassment Risks: under-reporting due to fear of victimisation
2. Sex: a man or a woman.	Positive: links to sexual harassment and gender-based violence policies; protection for all sexes; signposting to support.
3. Sexual Orientation: whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.	Positive: explicit prohibition of homophobic harassment and outing; use of inclusive language. Risk: fear of disclosure.
4. Gender Reassignment: the process of transitioning from one gender to another.	Positive: clear expectations on names/pronouns and privacy; protection against outing and misgendering.
5. Pregnancy and maternity.	Positive: coverage of pregnancy/maternity-related harassment; adjustments for participation in processes.
6. Age: people of different ages.	Positive: challenge age-related bullying; accessible reporting for younger and older employees.
7. Religion or belief or none (atheists).	Positive: protection for faith/non-faith; awareness of religious observance
8. Disability: people with disabilities (whether registered or not).	Positive: possible reasonable adjustments at every stage (communications, meetings etc); accessible routes; neurodiversity awareness. Risk: barriers to reporting.
9. Marriage and Civil Partnerships.	Positive: inclusion ensures protection from discrimination and harassment.
10. Caring responsibilities	Positive: flexibility for carers to engage with processes; protection from stereotyping.

11. Socio-economic disadvantage.	Positive: multiple confidential routes and support to reduce barriers.
12. Care experienced	Positive: recognition of potential vulnerability and past trauma; signposting to support.

3. Impact Assessment

Does the analysis above identify any differential impacts which need to be addressed?	Yes – differential impacts are identified across several protected groups and for socio-economic disadvantage; see Section 3 analysis and Action Plan.
Does the analysis above identify any potential negative impacts?	Yes – potential negative impacts include barriers to reporting for some groups, risk of re-traumatisation during investigations, and fear of victimisation. See Action Plan for mitigations.
Do you have enough information to make a judgement? If no, what information do you require?	Yes – sufficient evidence from national NHS Scotland and local authority policies and EHRC guidance. We will continue to refine through feedback from employees and monitoring after implementation.

4. Equality Impact Assessment Action Plan

Please complete the following action plan where you have identified any differential impacts or potential negative impacts in Section 3 of the Equality Impact Assessment.

Impact Identified	Action to be taken	Owner	How will it be monitored	Date Action to be completed
Barriers to reporting (e.g., disability, shift/remote workers, lower-paid roles).	Provide multiple reporting routes (line, manager's manager, HR, Trade Unions, confidential contacts); accessible formats and reasonable adjustments.	HR and OD / Service Managers	This will be monitored on an annual basis as part of our EDI priorities reporting.	Ongoing
Risk of victimisation or malicious complaints.	Clear guidance and proportionate sanctions for proven malicious complaints; support for all parties including accused where allegations not upheld.	HR and OD	Monitor employee and trade union feedback	Ongoing

5. Sign and Date

Signature:	
Name:	Nicola Fyffe
Date:	12 February 2026