



ORKNEY
ISLANDS COUNCIL

Item: 4

Human Resources Sub-committee: 1 September 2026.

Sexual Harassment Policy.

Report by Director of Infrastructure and Organisational Development.

1. Overview

- 1.1. The report presents the Sexual Harassment 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. The Sexual Harassment Policy provides dedicated guidance on recognising, preventing and responding to sexual harassment in the workplace. It outlines support arrangements for employees, management responsibilities, reporting procedures, workplace safety considerations and arrangements for addressing third party harassment.
- 1.6. 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.
- 1.7. 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 Sexual Harassment 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:

Andrew Groundwater, Head of Human Resources and Organisational Development, extension 2253, Email andrew.groundwater@orkney.gov.uk.

Implications of Report

1. **Financial** – There are no significant direct financial implications associated with approval of this policy. However, implementation may generate limited additional costs relating to staff training, management time, investigations, workplace adjustments and support arrangements. Any such costs are expected to be absorbed within existing budgets.
2. **Legal** – Adoption of the Sexual Harassment 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 – Sexual Harassment Policy.

Appendix 2 – Equality Impact Assessment - Sexual Harassment Policy.

Sexual Harassment Policy

Prevention, Awareness and Support

Prepared by HR and Organisational Development

Document Control Sheet

Review / approval history.

Date.	Name.	Position.	Version Approved.
xxxx	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 believe every colleague has the right to feel safe, valued and respected at work. We recognise that sexual harassment is a serious issue that can affect anyone, regardless of gender, age, race, sexual orientation, or background.

If you're reading this because you've experienced sexual harassment or want to support someone who has, we want you to know that we are here to listen and support you, and will treat your disclosure seriously, compassionately and confidentially. This policy outlines what sexual harassment is, how to recognise it, and what support is available, both within the workplace and externally.

What to expect from this policy

This policy aims to help you to:

- Understand what sexual harassment is.
- Understand what we mean by zero tolerance.
- Know what to do if you experience or witness sexual harassment.
- Be clear on your manager's responsibility for dealing with complaints.
- Know how to access emotional support whether you are experiencing sexual harassment, have been accused of it, or are supporting a colleagues.

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 sexual harassment?

Sexual harassment refers to any unwanted behaviour of a sexual nature that makes someone feel distressed, intimidated, degraded, humiliated, or offended. It can happen as a one-off incident or as part of a pattern of behaviour over time. What matters is how the behaviour is experienced not whether it was intended to cause harm.

This type of behaviour can occur in many different forms and settings, including in person, online, or through written communication. It may be subtle or more obvious, and can happen during work hours, at work related events, or in digital spaces connected to work. Sexual harassment can be perpetrated by anyone, including colleagues, managers, clients or members of the public, and it can affect people of all genders, backgrounds, and roles.

Examples of sexual harassment in the workplace include, but are not limited to:

- Sharing or circulating sexually explicit or inappropriate images or videos.
- Sending suggestive or inappropriate written communications, including letters, notes or emails.
- Displaying sexually inappropriate images, materials or posters in the workplace.
- Making lewd comments, jokes or sharing sexualised stories or anecdotes.
- Using inappropriate or offensive sexual gestures.
- Online harassment or stalking.
- Sexual assault or coercion.

Sexual harassment is not always obvious, and it doesn't have to be physical. Even behaviour that some may dismiss as 'banter' can cross a line if it makes someone feel unsafe or disrespected. If you're unsure whether something you've experienced or witnessed is sexual harassment, it's okay to ask questions and seek support. Everyone has the right to feel safe and respected at work.

Sexual harassment is a form of violence that anyone can experience, it is typically experienced more by women and is a driver of women's inequality in the workplace. It reflects and reinforces gendered power imbalances and contributes to a culture where women may feel unsafe, undervalued, or excluded. Addressing sexual harassment is therefore a key part of promoting gender equality and creating a respectful and inclusive working environment.

Recognising the signs of sexual harassment

Sexual harassment can take many forms and is not always immediately obvious. It may involve physical contact, verbal remarks, or non-verbal behaviours that make someone feel uncomfortable, intimidated, or degraded. These behaviours can be direct or subtle, and they may occur in person, online, or through other forms of communication.

You might notice a colleague becoming withdrawn, avoiding certain people or places, or showing signs of distress after interactions. They may seem anxious during meetings, particularly when certain people are present, or they may express discomfort about comments or jokes that others dismiss as harmless. Changes in behaviour, such as avoiding social events, becoming unusually quiet, or showing signs of stress, can also be indicators.

It's important to remember that sexual harassment doesn't always involve physical contact. It can include persistent unwanted attention, inappropriate remarks about someone's appearance, or repeated invitations that make someone feel pressured. Even if the behaviour is not directed at a specific individual, it can still create a hostile or offensive environment.

If you notice any of these signs in yourself or others, it's important to speak up or offer support. Everyone has the right to feel safe and respected at work.

Banter

Sometimes, experiences of sexual harassment are brushed off as 'banter', teasing, or just joking around. It might be described as part of the workplace culture or something that's 'just how people are'. But it's important to be clear: if the behaviour is of a sexual nature, is unwanted, and makes someone feel uncomfortable, intimidated, or disrespected, then it is sexual harassment regardless of how it's intended or how others perceive it.

Comments or actions that are framed as 'just having a laugh' can still cause real harm. What one person sees as harmless fun might feel degrading or humiliating to someone else. It doesn't matter if others think it's acceptable or commonplace, what matters is how it affects the person on the receiving end. If the behaviour violates someone's dignity or creates an environment that feels hostile, offensive, or unsafe, it should be taken seriously.

Everyone deserves to feel respected at work, and no one should have to tolerate behaviour that makes them feel uncomfortable just because it's labelled as banter.

Victimisation

It's important to be clear; victimisation is unlawful. Everyone has the right to raise concerns or support others without fear of retaliation or negative consequences. Creating a culture where people feel safe to speak out is essential to addressing sexual harassment and building a respectful workplace.

Victimisation happens when someone is treated unfairly or less favourably because they've raised a concern for example about sexual harassment, supported someone else in doing so, or are believed to be considering it. This might include being excluded from meetings, overlooked for opportunities, spoken to differently, or made to feel uncomfortable simply for speaking up or helping a colleague.

Orkney Islands Council will not tolerate any form of victimisation. Any behaviour that seeks to punish, isolate, or undermine someone for raising a concern will be taken seriously and may result in disciplinary action.

What to do if you experience sexual harassment

Taking a zero-tolerance approach

We adopt a zero-tolerance approach to sexual harassment. This means that we do not accept sexual harassment at Orkney Islands Council. Zero tolerance means we will never ignore or minimise bullying, harassment, or discrimination in any form, including sexual harassment. We take every concern seriously, whether raised informally or formally, and we are committed to responding fairly, using sound judgement and in line with our policies and values.

Where concerns are escalated formally, they will be investigated, and appropriate outcomes will follow. These may include formal warnings, mandatory training, reassignment of duties, or dismissal, depending on the nature and severity of the behaviour. Zero tolerance does not mean dismissal in every case. It means we are committed to acting in a way that fits the situation, supported by a fair and thorough process that considers the specific circumstances of each case. Malicious complaints will also not be tolerated. Where proven, they will be addressed in line with our disciplinary process.

Telling someone

We understand that speaking out about sexual harassment can be difficult. You can speak to any route you feel most comfortable with. This might be your line manager, HR and OD, a Wellbeing Champion, a Trade Union representative or another trusted manager.

Your manager's role is to:

- Listen without judgment, believe you and take your disclosure seriously.
- Provide initial support and signpost to help.
- Protect your confidentiality.
- Help you access support services.
- Work with you to make adjustments to ensure your safety and wellbeing at work.

If you don't feel like you can speak to your manager, remember we have an HR and OD team, a network of [Wellbeing Champions](#) and Trade Union representatives, who you can speak to.

Our **Employee Assistance Programme** also provides 24/7 access to telephone support, 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're not ready to speak to someone at work, we encourage you to seek support from recognised organisations listed in the [Useful resources](#) section below.

Resolving things informally

Sometimes an informal approach may be enough to make the harassment stop, especially where it is unintended, and the person is not aware that their behaviour is unwelcome. In these instances, an informal conversation may lead to greater understanding and an agreement by that person that their behaviour will change.

If you feel comfortable speaking to the person responsible about how their actions are making you feel, and asking them to stop, we encourage you to do so. You shouldn't do anything which may put you at risk of further sexual harassment or other harm.

If you don't feel comfortable to speak to the person but would still like to try and resolve the matter informally, talk to your manager, or another colleague, who can speak to them on your behalf.

We understand there may be times when you don't feel that you can speak to your manager or your complaint is about your manager. In this situation we would encourage you to speak to another manager in the organisation, HR or a Trade Union representative if you are a member.

It is important to be clear that engaging in informal resolution initially does not prevent you from raising a formal complaint later.

Raising things formally

If you don't feel comfortable raising your concern informally, or if the behaviour is too serious to be addressed informally, you should make a formal complaint. A formal complaint of sexual harassment should be made in writing to your line manager, or to the next level of management if the complaint is about your manager. The matter will then be formally investigated.

This process ensures your concern is handled fairly, sensitively, and in line with our policies. You can find out more about the process in the Manager Guide, or you can speak to your manager, HR, a Wellbeing Champion, Trade Union or if you need support in preparing your complaint or understanding the procedure.

If you ask us not to take things further

If you raise a complaint but then ask us not to take the matter any further, we will respect your wishes wherever possible while keeping safety under review. Where action is required to protect you or others, we'll explain why and ensure support is in place.

Witnessing an incident

If you witness sexual harassment, we encourage you to speak up.

If you feel safe and comfortable, you may choose to intervene at the time of the incident, support the person affected, and encourage them to seek appropriate help. You can also offer to provide a witness statement or raise the concern with an appropriate manager on their behalf.

You will not be treated unfavourably for speaking up. However, it's important to prioritise your own safety. Please do not take any action that could put you at risk of harm.

Criminal offence

Some acts of harassment may amount to a criminal offence. We will support you if you wish to report a crime to the police. We won't pressure you to make any decision but, in some situations, we may decide we have to tell the police for example if we believe there is an ongoing risk to you or others' safety. If we do report it, we will talk to you before we do and let you know when we have told them.

Confidentiality

If you tell your manager about your experience, they'll keep this confidential and won't share this information unless you say it's okay – except if we've got serious concerns for your safety or that of others. This includes where there are safeguarding concerns about children or vulnerable adults, where there is a high risk to safety or where we must act to protect the safety of members of the public, including other colleagues or customers. All records about sexual harassment will be kept strictly confidential.

If someone is placing you or members of your family in genuine or immediate danger, we may need to report this to the police.

Where it's necessary for us to share confidential information, we will always discuss this with you first unless it's unreasonable to do so.

Any breaches of confidentiality by any colleague will be taken seriously and may be subject to disciplinary action.

If you have been accused

We understand that it is distressing to be accused of sexual harassment. We will not make assumptions. Any concerns will be handled through a fair, sensitive and thorough process.

If we find the allegations are untrue, we won't allow you to suffer negative treatment in your employment because of it and will give you support if you need it.

Keeping you safe at work

Your safety is our priority. Where your experience may affect your safety at work, your manager will complete a workplace risk assessment with you to identify risks and agree practical measures. This will be reviewed with you regularly. Examples might include:

- Screening or diverting communications.
- Adjusting work patterns or locations.
- Providing alternative contact details.
- Ensuring you are not working alone.
- Keeping records of incidents.
- Supporting you with travel arrangements.
- Agreeing what information to share with colleagues.

Speak to your manager if you need support with any of these measures.

Workplace adjustments

We will work with you to make any reasonable adjustments that help you feel safe and supported at work. These may include:

- Flexible working arrangements.
- Temporary changes to duties or location.
- Turning off your camera during video calls.
- Providing a safe space for meetings.
- Using a Wellness Action Plan to identify support needs.
- Referral to Occupational Health if appropriate.

Time off work

We understand that experiencing sexual harassment can affect your ability to work. You may need time off to attend appointments, seek support, or recover. We will work with you to agree flexible working arrangements. If absence is related to your experience, the discretion process within our Managing Sickness Absence policy may apply.

Requests for time off will be handled sensitively and confidentially.

Third party sexual harassment and reporting

Sexual harassment doesn't always come from within the organisation. Sometimes, colleagues may experience harassment from people they come into contact with through their work, such as customers, clients, suppliers, agency workers, visitors, or members of the public. This is known as **third party harassment**.

Even though these individuals are not part of our workforce, we have a duty to take reasonable steps to prevent and respond to harassment from third parties.

If you experience or witness sexual harassment from someone outside the organisation, you should never feel that you have to tolerate it or manage it alone. We operate a zero-tolerance approach to sexual harassment from anyone and are committed to supporting you.

If you experience third party harassment:

- 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.

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.

Perpetrators

Sexual harassment is a disciplinary offence. As an employee, if you are found to have committed sexual harassment, disciplinary action may be taken, up to and including dismissal.

In cases where sexual harassment involves an abuse of power, such as a senior employee targeting a more junior colleague this may be a factor that is considered in a disciplinary process.

As an employee, if you disclose that you have engaged in inappropriate behaviour and would like to access support to change, your manager will signpost you to appropriate services, such as the local Orkney Rape and Sexual Assault Service and Women's Aid Orkney.

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Useful resources

There are many internal resources and external organisations that can offer further advice and practical guidance relating to sexual harassment:

Employee Assistance Programme (EAP)

Offers direct and confidential support to all employees. This includes 24/7 access to telephone counselling, every day of the year by contact the details below:

Call: 0808 168 2143

For online support visit: [Optima Health EAP](#)

Username: OIC001

Password: Wellbeing365!

Women's Aid Orkney

Provides free and confidential support to women and children who have been affected by domestic abuse.

Call: 01856 877900

Email: info@womensaidorkney.org.uk

Orkney Rape and Sexual Assault Service

Call: 01856 872298

Email: contact@orsas.scot

Scottish Domestic Abuse Helpline

Provides 24-hour Domestic Abuse and Forced Marriage advice and support.

Call: 0800 027 1234

Email: helpline@sdafmh.org.uk

Crimestoppers

An independent charity that allows people to report crime 100% anonymously. If you have information about criminal activity, you can speak up without revealing your identity.

For online information visit: www.crimestoppers-uk.org

Samaritans

A unique charity dedicated to reducing feelings of isolation and disconnection that can lead to suicide. They offer a safe space to talk, 24/7.

For online information visit: www.samaritans.org

LGBT Foundation

A national charity focused on LGBTQ+ health and wellbeing, offering support, advice, and resources tailored to the community.

For online information visit: www.lgbt.foundation

Scottish Women's Rights Centre

Provides frontline legal advice and support to women in Scotland who have experienced any form of violence or abuse.

For online information visit: www.scottishwomensrightscentre.org.uk

Rape Crisis Scotland

Scotland's national rape crisis organisation offering confidential support via helpline and text for anyone affected by sexual violence.

Call: Helpline (5pm–midnight): 08088 01 0302

Text: 07537 410 027

For online information visit: www.rapecrisisscotland.org.uk

Equality Advisory and Support Service (EASS)

Provides advice and assistance on equality and human rights issues across England, Scotland, and Wales.

For online information visit: www.equalityadvisoryservice.com

Galop

The UK's LGBT+ anti-abuse charity, offering support to those experiencing domestic abuse, sexual violence, or hate crime.

For online information visit: www.galop.org.uk

NHS – Help After Rape and Sexual Assault

Provides guidance and support for anyone affected by rape or sexual assault, including access to medical care and emotional support.

For online information visit: www.nhs.uk/live-well/sexual-health/help-after-rape-and-sexual-assault

This policy and guidance support Orkney Islands Council's commitment to the Equally Safe at Work accreditation programme and Scotland's national Equally Safe strategy to prevent and eradicate violence against women and girls, while supporting all victim-survivors of domestic abuse and gender-based violence.



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.	Sexual Harassment Policy (Prevention, Awareness and Support)
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).	Splitting of existing Dignity at Work policy, which incorporated prevention of sexual harassment, to create a new corporate policy establishing Orkney Islands Council's approach to preventing, recognising and responding to sexual harassment in the workplace, including support for affected employees and guidance for managers.

2. Primary Information

What are the intended outcomes of the proposal or change?	The intended outcome is to provide a clear framework for preventing, identifying and responding to sexual harassment within the workplace. The policy aims to help employees understand what sexual harassment is, recognise unacceptable behaviour, understand available reporting options and access appropriate support. It promotes a culture of dignity, respect and zero tolerance towards sexual harassment whilst ensuring concerns are handled fairly, sensitively and consistently. The policy also outlines support available to employees experiencing sexual harassment, responsibilities of managers, approaches to third-party harassment, and measures to protect employees' safety and wellbeing. The policy supports compliance with the Equality Act 2010 and
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	reinforces the Council's commitment to creating an inclusive, safe and respectful working environment for all employees
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 Orkney Islands Council employees, including managers, temporary employees and agency workers. The policy is most likely to affect individuals who experience, witness, report or are accused of sexual harassment, as well as managers responsible for responding to concerns.
How have stakeholders been involved in the development of this proposal or change?	Development has been informed through the Equally Safe at Work programme, engagement with HR and Organisational Development colleagues, Trade Union representatives, organisational learning from related policy development, and consideration of national guidance and best practice relating to sexual harassment prevention and employer responsibilities.
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.	National evidence demonstrates that sexual harassment can affect anyone but is experienced disproportionately by women. Research from Equally Safe, Close the Gap, the Equality and Human Rights Commission (EHRC), ACAS and Scottish Government guidance identifies sexual harassment as a significant workplace equality issue that can negatively affect wellbeing, safety, retention, engagement and career progression. Evidence also highlights that some groups, including younger workers, women, LGBT+ individuals, disabled people and minority ethnic communities, may experience heightened risks of harassment or face additional barriers to reporting concerns. The policy reflects emerging good practice, including employer duties regarding prevention, support, third-party harassment and organisational culture.
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.	Evidence suggests that employees in lower-paid, customer-facing, insecure or junior roles may be more vulnerable to experiencing sexual harassment and may feel less able to challenge inappropriate behaviour. Individuals experiencing socio-economic disadvantage may also be more concerned about negative consequences arising from reporting concerns. The policy includes multiple reporting routes, support mechanisms,

	confidentiality protections and access to adjustments designed to reduce barriers to reporting and accessing support.
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.	Positive: provides protection from racially-sexualised harassment and recognises the need for safe reporting routes. Risk: some minority ethnic employees may face additional cultural or organisational barriers to reporting concerns.
2. Sex: a man or a woman.	Positive: directly addresses a workplace issue which disproportionately affects women whilst providing protections for all sexes. Supports gender equality and a safer workplace culture.
3. Sexual Orientation: whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.	Positive: protects employees from harassment linked to sexual orientation and provides inclusive support for all affected individuals. Risk: fear of disclosure or outing may discourage reporting.
4. Gender Reassignment: the process of transitioning from one gender to another.	Positive: supports trans and non-binary employees who may be at increased risk of sexualised harassment or inappropriate behaviour. Risk: concerns regarding confidentiality may affect willingness to report.
5. Pregnancy and maternity.	Positive: provides protections and reporting routes where inappropriate behaviour relates to pregnancy, maternity or related circumstances.
6. Age: people of different ages.	Positive: supports employees of all ages. Evidence suggests younger employees may be particularly vulnerable to sexual harassment in some workplace settings.
7. Religion or belief or none (atheists).	Positive: promotes respectful behaviour regardless of religion or belief and supports employees who experience harassment linked to cultural or religious factors.
8. Disability: people with disabilities (whether registered or not).	Positive: allows for reasonable adjustments throughout reporting and investigation processes. Risk: disabled employees may face additional barriers to reporting or engaging with formal procedures without adjustments.
9. Marriage and Civil Partnerships.	Positive: ensures all employees receive equal protection from sexual harassment regardless of relationship status.

10. Caring responsibilities	Positive: workplace adjustments and flexibility can support employees managing both caring responsibilities and the impacts of harassment.
11. Socio-economic disadvantage.	Positive: confidential reporting routes and support mechanisms may reduce barriers experienced by lower-paid or insecure workers.
12. Care experienced	Positive: recognises that previous experiences of trauma may influence how individuals experience harassment and engage with reporting processes. Trauma-informed support approaches may provide additional benefit.

3. Impact Assessment

Does the analysis above identify any differential impacts which need to be addressed?	Yes. Some groups may face additional barriers to reporting, accessing support or participating in workplace processes. These include women, younger employees, disabled employees, LGBT+ employees, minority ethnic employees and those experiencing socio-economic disadvantage.
Does the analysis above identify any potential negative impacts?	Yes. Potential negative impacts include fear of victimisation, concerns regarding confidentiality, fear of not being believed, cultural barriers to reporting, and the possibility of re-traumatisation when discussing experiences of harassment.
Do you have enough information to make a judgement? If no, what information do you require?	Yes. Sufficient evidence is available from national research, Scottish Government policy, Equally Safe at Work resources, EHRC guidance and employer good practice. Further learning will be informed by employee feedback, policy implementation and ongoing monitoring.

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 sexual harassment.	Provide multiple reporting routes including managers, HR and OD, Wellbeing Champions and Trade Union representatives. Ensure employees are aware of support options.	HR and OD / Service Managers	Monitor employee feedback and implementation of the policy.	End 2026
Fear of victimisation or negative consequences following disclosure.	Reinforce zero tolerance of victimisation, clear confidentiality arrangements and protections for those raising concerns.	HR and OD / Service Managers	Monitor complaints, case trends and employee feedback.	Ongoing
Risk of re-traumatisation during reporting or investigation processes.	Promote trauma-informed approaches, manager guidance and access to specialist support and counselling services.	HR and OD / Service Managers	Review feedback and training uptake.	Ongoing
Accessibility barriers for disabled employees.	Ensure reasonable adjustments and accessible communication methods are offered throughout reporting and investigation processes.	HR and OD / Service Managers	Monitor adjustment requests and employee feedback.	Ongoing

Risks associated with third-party harassment.	Promote awareness of third-party reporting procedures and ensure managers take prompt action where incidents are reported.	Service Managers / Legal	Monitor incident reporting and organisational learning.	Ongoing
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5. Sign and Date

Signature:	
Name:	Nicola Fyffe
Date:	12 February 2026