

Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed
Please state if the IIA is interim or final

1. Title of proposal

Implementation of a new Sexual Harassment Policy to the Council.

2. What will change as a result of this proposal?

This policy will be the first standalone sexual harassment policy for CEC. It will outline our commitment to creating a safe and protected work environment for all colleagues, what preventative actions the Council will take towards sexual harassment and where reports are made how they will be responded to and managed / addressed within the Council.

3. Briefly describe public involvement in this proposal to date and planned

This is colleague policy for internal Council use however engagement has taken place with multiple colleague groups and Trade Unions as well as gaining insight through a colleague survey. We have also engaged with external organisations with specialist knowledge in this area.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

No, this new employment policy does not directly tackle socio-economic disadvantage and reduce the inequalities that are associated with being disadvantaged however we do recognise within this IIA, the positive benefits that this policy will bring to contributing to the Council's duty under the FSD.

5. Date of IIA

7 May 2024

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title	Date of IIA training
Emma Kilpatrick	Lead HR Consultant (Facilitator)	18 May 2022
Alana Baillie	Senior HR Consultant	22 May 2019

Olivia Reed	HR Consultant (Note taker)	24 October 2023
Andrew Burgess	Senior HR Consultant - OD	15 November 2018
Richard Thrall	Governance Officer	7 November 2019
Charlotte Fleming	Senior Solicitor	
Caroline McKellar	Senior HR Consultant – OD	
Sarah Fletcher	Joint Team Leader – Willow Service	
Angela Voulgari	Equally Safe Edinburgh Committee Lead Officer	
Claire Ryan-Heatley	Trauma Lead Officer	
Kelsey Smith	Close the Gap	

7. Evidence available at the time of the IIA

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Data on populations in need	Council demographics	<p>Data as at April 2024:</p> <table border="1" data-bbox="528 450 1155 573"> <thead> <tr> <th>Sex</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>70.97%</td> </tr> <tr> <td>Male</td> <td>29.01%</td> </tr> <tr> <td>Unspecified</td> <td>0.02%</td> </tr> </tbody> </table> <table border="1" data-bbox="528 611 1155 786"> <thead> <tr> <th>Disability Status</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>01 Yes - limited a lot</td> <td>1%</td> </tr> <tr> <td>02 Yes - limited a little</td> <td>2%</td> </tr> <tr> <td>03 No</td> <td>76%</td> </tr> <tr> <td>04 Prefer not to say</td> <td>5%</td> </tr> <tr> <td>Not declared</td> <td>16%</td> </tr> </tbody> </table> <table border="1" data-bbox="528 824 1155 1081"> <thead> <tr> <th>Ethnicity</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>A - White</td> <td>75%</td> </tr> <tr> <td>B - Mixed or multiple ethnic groups (please write in further information)</td> <td>1%</td> </tr> <tr> <td>C - Asian</td> <td>3%</td> </tr> <tr> <td>D - African (please write in further information)</td> <td>1%</td> </tr> <tr> <td>E - Caribbean or Black (please write in further information)</td> <td>0%</td> </tr> <tr> <td>F - Other ethnic group (please write in further information)</td> <td>1%</td> </tr> <tr> <td>Prefer not to say</td> <td>3%</td> </tr> <tr> <td>Not declared</td> <td>15%</td> </tr> </tbody> </table> <table border="1" data-bbox="528 1120 1155 1323"> <thead> <tr> <th>Age</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>under 21</td> <td>1%</td> </tr> <tr> <td>21-30</td> <td>14%</td> </tr> <tr> <td>31-40</td> <td>24%</td> </tr> <tr> <td>41-50</td> <td>26%</td> </tr> <tr> <td>51-60</td> <td>24%</td> </tr> <tr> <td>61+</td> <td>11%</td> </tr> </tbody> </table> <table border="1" data-bbox="528 1361 1155 1749"> <thead> <tr> <th>Religion</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>01 Another religion or body (please write in further information)</td> <td>0.80%</td> </tr> <tr> <td>02 Buddhist</td> <td>0.13%</td> </tr> <tr> <td>03 Church of Scotland</td> <td>4.31%</td> </tr> <tr> <td>04 Hindu</td> <td>0.28%</td> </tr> <tr> <td>05 Jewish</td> <td>0.03%</td> </tr> <tr> <td>06 Muslim (please write denomination or school in further information)</td> <td>0.86%</td> </tr> <tr> <td>07 None</td> <td>21.41%</td> </tr> <tr> <td>08 Other Christian (please write in further information)</td> <td>2.12%</td> </tr> <tr> <td>09 Pagan</td> <td>0.09%</td> </tr> <tr> <td>10 Roman Catholic</td> <td>4.71%</td> </tr> <tr> <td>11 Sikh</td> <td>0.08%</td> </tr> <tr> <td>12 Prefer not to say</td> <td>5.21%</td> </tr> <tr> <td>Not declared</td> <td>59.97%</td> </tr> </tbody> </table> <table border="1" data-bbox="528 1787 1155 1977"> <thead> <tr> <th>Sexual Orientation</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>01 Bisexual</td> <td>1.2%</td> </tr> <tr> <td>02 Gay or Lesbian</td> <td>1.5%</td> </tr> <tr> <td>03 Straight/Heterosexual</td> <td>33.3%</td> </tr> <tr> <td>04 Other sexual orientation (please write in further information)</td> <td>0.1%</td> </tr> <tr> <td>05 Prefer not to say</td> <td>3.1%</td> </tr> <tr> <td>Not declared</td> <td>60.9%</td> </tr> </tbody> </table>	Sex	Percentage	Female	70.97%	Male	29.01%	Unspecified	0.02%	Disability Status	Percentage	01 Yes - limited a lot	1%	02 Yes - limited a little	2%	03 No	76%	04 Prefer not to say	5%	Not declared	16%	Ethnicity	Percentage	A - White	75%	B - Mixed or multiple ethnic groups (please write in further information)	1%	C - Asian	3%	D - African (please write in further information)	1%	E - Caribbean or Black (please write in further information)	0%	F - Other ethnic group (please write in further information)	1%	Prefer not to say	3%	Not declared	15%	Age	Percentage	under 21	1%	21-30	14%	31-40	24%	41-50	26%	51-60	24%	61+	11%	Religion	Percentage	01 Another religion or body (please write in further information)	0.80%	02 Buddhist	0.13%	03 Church of Scotland	4.31%	04 Hindu	0.28%	05 Jewish	0.03%	06 Muslim (please write denomination or school in further information)	0.86%	07 None	21.41%	08 Other Christian (please write in further information)	2.12%	09 Pagan	0.09%	10 Roman Catholic	4.71%	11 Sikh	0.08%	12 Prefer not to say	5.21%	Not declared	59.97%	Sexual Orientation	Percentage	01 Bisexual	1.2%	02 Gay or Lesbian	1.5%	03 Straight/Heterosexual	33.3%	04 Other sexual orientation (please write in further information)	0.1%	05 Prefer not to say	3.1%	Not declared	60.9%
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Prefer not to say	4%																																																																																																			
Not Declared																																																																																																				
Female	70%																																																																																																			
Male	30%																																																																																																			
Prefer not to say	0%																																																																																																			

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>document and provided to attendees in advance – these included sources such as CIPD, TUC surveys, Close the Gap.</p>	<p>Between 45-60% of women (surveys vary) have experienced some form of sexual harassment within the workplace with younger women particularly being at risk. 63% of women ages 18-24 have experienced sexual harassment.</p> <p>Women are also more likely to have been harassed by someone more senior than them – 31% compared to 26% of men).</p> <p>68% of LGBT workers experienced at least one type of sexual harassment. However, this is a hidden problem with two thirds of those who were harassed not reporting it; and one in four of those who did not report the harassment being silenced by fear of ‘outing’ themselves at work.</p> <p>A TUC study of women with disabilities found that 68% of respondents had been sexually harassed at work in comparison to 52% of women in general.</p> <p>Only a third of those who experienced sexual harassment had formally reported it. Common reasons for non-reporting include the complaint won’t be taken seriously, negative impact on career or work relationships.</p> <p>Racially minoritised women’s experiences of sexual harassment is often linked to racism and they are often dealt with separately. This is included in the TUC report ‘still just a bit of banter’.</p>
Data on service uptake/access	Data from Halo – recorded disciplinary	<p>Unfortunately, the HR system is not currently set up to record sexual harassment cases as a standalone category, they are recorded under a general ‘bullying and harassment’ category. Therefore, data is limited of the number of colleague’s who have been taken through a disciplinary process due to behaviours related to sexual harassment.</p> <p>The Health & Safety portal should be recording all incidents of sexual harassment within the organisation; however, records show within the last 2 years there have only been 4 recorded incidents of sexual harassment. After further investigation, it has been highlighted that the sub-category</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	Data from SHE Portal – recorded incidents	field (to determine nature of prejudice-based incident) is not mandatory, therefore incidents may have been recorded but it is difficult to categorise them.
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	Information on socio-economic disadvantage was consolidated into a supporting document and provided to attendees in advance – these included sources such as CIPD, TUC surveys, Close the Gap.	<p>While there were little differences in the numbers experiencing sexual harassment between socio-economic groups, there were differences within the reasons for non-reporting as well as the locations where the harassment may take place.</p> <p>Those in higher managerial positions were less likely to report due to the potential length of time to investigate while those in routine occupations didn't report due to potential embarrassment.</p> <p>Those in intermediate or routine occupations were more likely to experience sexual harassment in the workplace while higher managerial occupations were more likely to experience it while socialising with colleagues, visiting customers or during an interview.</p>
Data on equality outcomes	City of Edinburgh	Theme 5 of the Framework is to create a diverse and inclusive workplace within the organisation. Within this, the Council is committed to achieving the following outcome:

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	Council's Equality & Diversity Framework 2021-2025	<p><i>“a more inclusive working environment is experienced by colleagues who share protected characteristics and colleagues are supported by an inclusive workplace culture and feel confident to challenge prejudice-based behaviours”</i></p> <p>This new Policy will contribute to this outcome as it will outline clear ways to report and speak up on sexual harassment within the organisation. It is also proposed that training that will support the policy will aim to raise awareness of sexual harassment and encourage people to speak up and challenge behaviours, and understand the impact within organisations.</p>
Research/literature evidence	Information on the various themes of the Policy was consolidated into a supporting document and provided to attendees in advance	<p>Colleagues are often unsure about how to report due to unclear processes or where to access support.</p> <p>More information can be found in the supporting document that covers a range of articles and data.</p>
Public/patient/client experience information	Not applicable.	
Evidence of inclusive engagement of	Engagement with colleagues	An all colleague survey was published to run between mid-April and mid-May to gauge anonymous feedback from colleagues on two questions:

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
people who use the service and involvement findings	within the organisation remains ongoing through a survey	<p>What would you expect to be included within a Sexual Harassment Policy for the Council?</p> <p>What more could the Council do to prevent Sexual Harassment?</p> <p>We only received 85 responses to the survey.</p>
Evidence of unmet need	Not applicable	
Good practice guidelines	<p>Engender</p> <p>CIPD</p> <p>Acas</p>	<p>Engender is a Scottish feminist membership organisation who work to advance equality between women and men, producing research, lobbying decision-makers and empowering women to campaign for change. They produced a model Sexual Harassment and Prevention Action Policy which organisations can use, adapt and adopt to suit their needs.</p> <p>https://www.engender.org.uk/content/publications/1663694699_MODEL-Sexual-Harassment-Prevention-and-Action-Policy.pdf</p> <p>CIPD provide practical support for organisation in tackling sexual harassment at work. This includes clear definitions and how organisations should respond to incident providing a clear reporting procedure.</p> <p>https://www.cipd.org/uk/knowledge/guides/sexual-harassment-work/#:~:text=The%20first%20step%20to%20achieving,the%20consequences%20of%20such%20behaviour.</p> <p>Acas provide good practice guidance on how organisations should prevent and manage sexual harassment within the workplace. Similar to CIPD they provide definitions, and outlines the steps that should be in place. They also provide recommendations for specialist support services for victim/survivors.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	EHRC	https://www.acas.org.uk/sexual-harassment/steps-for-employers-to-prevent-sexual-harassment EHRC provide guidance on what should be included in a sexual harassment policy. https://www.equalityhumanrights.com/sites/default/files/2021/sexual-harassment-and-harassment-at-work.pdf
Carbon emissions generated /reduced data	Not applicable	
Environmental data	Not applicable	
Risk from cumulative impacts	Not applicable	
Other (please specify)	Not applicable	
Additional evidence required		

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Positive</p> <p>Sexual harassment is widespread It is experienced by all demographic subgroups albeit to different degrees. $\frac{3}{4}$ of the adult population has experienced sexual harassment at some point in their lifetime. 29% of those in employment reported having experienced some form of sexual harassment in their workplace or work-related environment, equating to a 1/5 of the population. Therefore, this policy will impact a large percentage of our organisation in some way through raising awareness of what sexual harassment is and what we can all do to prevent it.</p>	<p>All colleagues</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Anyone with a protected characteristic that is isolated from a family/friends support network may find it hard to report or find support. This policy will allow them an avenue to report and signpost them to the right support.</p> <p>Those with a protected characteristic may experience sexual harassment in different way and it may look and feel different to those groups. The policy defines clearly what sexual harassment is and covers a wide range of examples.</p> <p>Those colleagues of a certain generation may have experiences of sexual harassment, but they have become the social norm or they come from a culture where they were acceptable or tolerated. Those colleagues may not choose to report as they do not recognise it as sexual harassment. Policy will raise awareness of what is sexual harassment at different levels.</p> <p>The tolerance threshold for younger colleagues may be different due to the exposure of unacceptable behaviour (pornography) on the internet and social media. Sexual harassment sits on a spectrum of behaviour and reporting may not happen until it reaches a certain extreme. Policy will raise awareness of what is sexual harassment at different levels.</p> <p>Young women are more likely to experience sexual harassment in the workplace and this policy will look to raise awareness of the role power dynamics, age and gender play within sexual harassment.</p> <p>Statistics show that more women will experience sexual harassment and therefore we want to recognise that 70% of their Council is women and therefore the policy will have a positive impact on them and provide women with a safe place to report.</p> <p>Although women are most likely to experience sexual harassment, men also experience quite high levels of sexual harassment. There are some differences in the types of sexual harassment experienced by gender. The policy will be gender informed, and gender sensitive in our decision making as well as covering all colleagues.</p> <p>Some women say they are reluctant to report because their senior management team are all male. This policy will provide alternative mechanisms for reporting.</p>	<p>Colleagues with protect characteristics</p> <p>Colleagues with protect characteristics</p> <p>Older colleagues</p> <p>Younger colleagues</p> <p>Younger colleagues Women</p> <p>Women</p> <p>Women, men and LGBTQ+ colleagues</p> <p>Women</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Sexual harassment can be understood within the wider context of gender based violence, which is defined as violence directed against a person on the basis of their gender. It is men who predominantly carry out such violence and women who are predominantly the victims. Referring to violence as 'gender-based' highlights the need to understand violence within the context of women's and girls' disadvantaged status in society. Such violence cannot be understood in isolation from the norms, social structure and gender roles within the community, which greatly influence women's vulnerability to violence. This policy will support that wider policy agenda.</p> <p>However, the policy will also acknowledge that regardless of sex and gender anyone can be a perpetrator and therefore removes the idea that perpetrators are always senior male managers.</p> <p>Those that share more than one protected characteristic are more likely to experience sexual harassment, the policy will acknowledge this and acknowledge that harassment against any protected characteristic will be treated the same. This policy will detail the importance of recognising intersectionality.</p> <p>Policy will acknowledge and raise awareness of cultural differences and how this can impact on behaviours and reasons</p> <p>Policy will cover clear examples and will try to raise awareness of examples from different generations and how they could be perceived as okay in one group but unwanted in another.</p> <p>Policy/supporting material will show awareness of how different religions might view certain behaviours and why you may not want to report. For example a young woman of a certain religion may not want to report sexual harassment as she may then be seen as impure in her community.</p> <p>Raising awareness and understanding of intersectionality and moral codes will support better conversations with colleagues and promote a speak up culture that is sensitive to all differences.</p>	<p>Women</p> <p>Men</p> <p>Colleagues with more than one protected characteristic</p> <p>Colleagues from different religions or beliefs. Minority ethnic colleagues</p> <p>Older and younger colleagues.</p> <p>Colleagues from different religions or beliefs.</p> <p>Colleagues with more than one protected characteristic</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Policy will raise awareness and give examples that sexual harassment happens regardless of the persons sexual orientation.</p> <p>The policy will link to the existing guidance on Managing Relationships in the Workplace and reinforce the importances on declaring relationships to protect colleagues.</p> <p>The policy will acknowledge that sexual conduct that has been consensual in the past that becomes unwanted is sexual harassment and will recognise that such harassment can occur within relationships and the policy will work in partnership with the Domestic Abuse Policy.</p> <p>Policy will be trauma informed which will look to involve the victim survivor throughout the process where appropriate, give them back choices and control and create a safe space to disclose. This will be our approach to reporting, responding, and managing cases – taking into consideration how past trauma can be a barrier to supporting and how managers should respond. Further aftercare support will also be signposted.</p> <p>Policy will make aware that sexual harassment could happen in different places and what someone experiences may look different depending on background.</p> <p>The policy will cover colleague on colleagues’ harassment but also incidents involving service users. Those vulnerable of falling into poverty may be service users and due to the power dynamics between service giver and service user there may be incidents of sexual harassment.</p> <p>Colleagues in certain roles may be more at risk to experiencing inappropriate sexual behaviour or unwarranted sexual attention but may see this as part of the job and normalise the behaviour, and therefore previously not reported it. The policy will reinforce that we do not tolerate sexual harassment of any kind. We need to introduce clear parameters, and risk assessments to support those that will be potentially more exposed.</p> <p>We want to promote a choice when reporting. There may be colleagues who don’t seen their managers very often or do not feel comfortable reporting to their manager. The policy</p>	<p>LGBTQ+ colleagues</p> <p>Colleagues in a relationship</p> <p>Colleagues in a relationship</p> <p>All colleagues specifically those with protected characteristics, asylum seekers / refugees and care experienced young people.</p> <p>All colleagues particularly those from lower socio-economic backgrounds</p> <p>Those vulnerable to falling into poverty</p> <p>All colleagues particularly those working shifts, lone working or with service users.</p> <p>All colleagues</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>includes other ways to report and get support for example speak up supporters, colleagues, HR etc.</p> <p>As a result of the policy implementation, we may see an increase in reports of sexual harassment. This does not necessarily mean more cases, but people are now more confident to come forward and report.</p> <p>The policy will look to improve the quality of the service we are providing as making it more gender informed. There will be sensitivity around the decision making and it will take a trauma informed response. This should encourage more people to come forward and report and we hope that their experience through the process will be a positive one. We hope that colleagues using this policy will not feel like matters were dismissed and that their reports are taken seriously.</p> <p>As a result of this policy review, it has highlighted changes we could make to the disciplinary and grievance user guides to make the process more trauma informed and sensitive to each colleague's experiences.</p> <p>At the moment there is reporting that happens through whistleblowing disclosures that should be dealt with through other policies however colleagues would like to report anonymously through whistleblowing instead. This new policy should allow colleagues to feel more confident in the process. Policy will also recognise that we will investigate anonymous reports but might make it harder for what we can do.</p> <p>It is recognised that sexual harassment can have serious impacts on the victim/survivor, witnesses and alleged perpetrator and this policy promote better wellbeing and mental health, signposting internal and external support.</p>	<p>All colleagues</p> <p>All colleagues</p> <p>All colleagues</p> <p>All colleagues</p> <p>All colleagues</p> <p>All colleagues</p>
<p>Negative</p> <p>Even with a new policy in place, there remain many different barriers to reporting. Those with a protected characteristic may find it harder to report because they are junior staff, power imbalances within the workplace, they're on an unsecure contract, fear of victimisation / victim blaming.</p> <p>Specifically....</p> <p>...male victims may find it difficult to report because of gendered notions in society.</p>	<p>Colleagues with protected characteristics</p> <p>Men</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>.... there needs to be a recognition that colleagues with a disability may not report harassment as they feel they are less likely to be believed than non-disabled people.</p> <p>.... LGBTQ+ colleagues are often prevented from reporting by fear of being 'outed' at work.</p> <p>... colleagues transitioning could experience barriers to reporting as they can already feel in a vulnerable position and less likely to speak up.</p> <p>... that colleagues from migrant backgrounds may have sponsorship to work and may be reluctant to report due in case it negatively impacts their visa status. The policy will ensure that any reports of sexual harassment will be treated seriously and not be reported to the Home Office and effect the colleague's status to work.</p> <p>Those with low literacy skills may find it hard to access the policy.</p> <p>Employees in frontline roles with no access to the intranet may be unable to access the Policy without requesting it from a colleague or manager. Given the sensitivity surrounding the disclosure / reporting of sexual harassment or if the manager is the alleged perpetrator, this may discourage employees from seeking support, or they may not be aware of the support available</p> <p>As a result of the policy implementation, we may see an increase in reports of sexual harassment. This will result in colleagues requiring greater capacity to manage cases.</p> <p>Even with a policy in place, having an inexperienced and unsupportive line manager is a barrier to the process. Managing cases of sexual harassment will not be as common as cases about sickness absence for example.</p>	<p>Colleagues with disabilities.</p> <p>LGBTQ+ colleagues</p> <p>Trans colleagues</p> <p>Refugees / Migrant workers</p> <p>All colleagues</p> <p>All colleagues without Orb access</p> <p>All colleagues particularly those in HR, Investigations Team and Nominated Officers.</p> <p>All colleagues</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
Positive	

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>We have considered the working environment in relation to this Policy.</p> <p>Although it was most common for individuals to experience sexual harassment actually at their place of work, experiences also took place in other work-related environments. The policy will consider all work related environments. It doesn't need to only happen in the workplace during office hours for it to be an employment issue.</p> <p>This policy will acknowledge that people's work environment may differ and the risk and exposure to sexual harassment could look and feel different depending on the environment you work in.</p>	<p>All colleagues</p> <p>All colleagues particularly those lone workers, peripatetic workers and those working remotely.</p>
<p>Negative</p> <p>Difficulties of accessing the policy if colleagues do not work in an office with easy access to the computer</p>	<p>All colleagues</p>

Economic	Affected populations
<p>Positive</p> <p>Improved absenteeism – encouraging colleagues to remain in the workplace and support them through this policy instead of another. Retention within the workplace and becomes attractive place to work, employer of choice.</p> <p>Organisations where there is frequent sexual harassment or sexist behaviour negatively affects the overall wellbeing of the workplace. Organisations with a reputation of poor practice on sexual harassment will also have a smaller pool of candidates to select from when recruiting. With this policy we want to be seen as an organisation with a good reputation.</p> <p>Employees who are suspended are on full pay.</p>	<p>All colleagues and potential new colleagues</p> <p>All colleagues and potential new colleagues</p> <p>All colleagues</p>
<p>Negative</p> <p>There are times investigations can be lengthy and may have a negative impact on the working conditions of both the victim survivor and the perpetrator.</p>	<p>All colleagues</p>

Economic	Affected populations
Those going through the policy and go off sick, they may move to half pay under sickness absence policy and potential to affect earnings	All colleagues

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?

This is an internally managed policy.

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

This is an internal colleague policy. The Policy will be written in Plain English. It is expected that line managers will also be responsible for the dissemination and promotion of this policy and be able to explain the core components to colleagues.

We will work with Communications to ensure the policy and the key principles are communicated at launch in a variety of mechanisms to ensure as much coverage as possible across all colleague groups. The Policy will be available on the Orb, external website and with a supporting poster campaign.

There will also be supporting Learning – both online and in person – to ensure the Policy is communicated to as many people within the Council as possible.

11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.

Not applicable

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
<p>The Council needs to acknowledge the barriers to reporting sexual harassment across all protected characteristics, and actively take steps to remove them.</p> <ul style="list-style-type: none"> • The Policy will call this out. • The Policy will link in with the Speak Up Supporters and wider early resolution culture work. • The supporting Communications and Learning will focus on this. 	<p>ER Team</p> <p>ER Team</p> <p>ER Team, Learning and Communications</p>	<p>First draft – May 2024</p> <p>First draft – May 2024</p> <p>In advance of committee approval – Oct 2024</p>	<p>Sept 2024</p> <p>Sept 2024</p> <p>Oct 2024</p>
<p>Where the colleagues are non-English speakers or have low literacy skills, managers are responsible for ensuring their policy is shared and understood and, where necessary, signpost people to the Council’s Interpretation and Translation Services to make the policy available in different languages.</p>	<p>ER Team</p> <p>Managers</p>	<p>In communications – Oct 2024</p>	

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
In addition to the intranet, the Policy will also be available on the external website as well as signposted through our poster campaign	ER Team / Communications	Oct 2024	N/A
HR, the Investigations Team and Nominated Officers need to be aware of the potential impact of the policy for increased workloads	ER Team	In advance of launch --Oct 2024	April 2025
To ensure all managers are upskilled in responding to and managing reports of sexual harassment, as well as promoting a safe and protected working environment, we will develop supporting e-learning as well as in person training dedicated to these areas	ER Team / Learning	Oct 2024	December 2024
To ensure colleague wellbeing (and reduce long term absence) and experience of policy is as positive as possible, steps will be taken to ensure all colleagues are regularly updated on the progress of cases and reasons for any delays are given.	ER Team / Case Work Team / Investigations Team	Oct 2024	April 2025

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

Not applicable

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

In advance of the Policy launch, we will be working with our colleagues within the Systems and H&S Team to ensure that the systems in place for recording incidents has been reviewed to ensure more robust reporting mechanisms. This will allow us to understand the numbers of reported incidents as well as identifying trends.

16. Sign off by Head of Service

Name Nareen Turnbull

Date 02/07/2024

17. Publication

Completed and signed IIAs should be sent to:

integratedimpactassessments@edinburgh.gov.uk to be published on the

Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care

sarah.bryson@edinburgh.gov.uk to be published at

www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/