

Equality Impact Assessment Form

About the function, policy, project or decision being assessed

What is being assessed?	<input type="checkbox"/>	Function
	<input checked="" type="checkbox"/>	Policy
	<input type="checkbox"/>	Project
	<input type="checkbox"/>	Decision
Title of the function, policy, project, or decision	Anti Bullying and Harassment Policy (revised)	
What is this function, policy, project, or decision aiming to achieve?	To ensure that every staff member is treated with dignity and respect and that a working environment which is safe, healthy and harmonious is created and maintained. This policy is cross referenced to both the Grievance Policy and Disciplinary Policy as the provisions in both of those apply when dealing with bullying and harassment.	
Who is affected by this function, policy, project, or decision?	All staff with a Contract of Employment	
Who should be consulted about this function, policy, project, or decision?	TU, Staff	
Who is conducting this impact assessment?	Marilyn Maidment (HR Business Partner) Chris Vinestock (COO/DOI)	
Date: 05/01/2023		Version: 1.0

Initial screening

Question	Y	N	If 'YES', briefly explain why
Does this policy, project or decision relate to our functions or areas of work within those functions for which EIA has identified equality impacts?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Does this policy, project or decision relate to our Equality Objectives?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Is there a risk that this policy, project, or decision could disadvantage any group of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy could affect slightly differently people who may require reasonable adjustments due to disability or want to use the Welsh language. However, the arrangements for responding to the

			needs of these individuals are already covered by other PSOW policies e.g. the Grievance Policy and Disciplinary Policy both potentially activated, if a claim of harassment needs to be investigated or dealt with.
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If you answered 'yes' to any of the questions above, proceed to the full impact assessment.

Impact Assessment

Characteristic	Potential impact			Please explain this impact	Can this impact be mitigated or enhanced? If so, how?	Impact after actions		
	Negative	Neutral	Positive			Negative	Neutral	Positive
Cross-cutting considerations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This policy ensures that a fair and consistent process is in place applied fairly to all staff.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The Grievance Policy which is activated if a claim of Harassment needs to be investigated, states explicitly that members of staff must not be discriminated against or victimised for raising the grievance. In addition, the Anti Bullying and Harassment Policy reinforces that staff raising an issue under the policy will not be victimised or treated less favourably.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A study in October 2019 completed by the Young Women's Trust found that one in four young women are scared they will be sacked if they report sexual harassment. The TUC also completed a study finding that some two thirds of women had experienced harassment at work and one in three said they did not know how to report harassment. Anxieties about being sacked were 30% higher for young disabled women. 80% of respondents said they had been treated less positively by their employers because they had refused unwanted sexual advances, while 5% said they had to leave their job due to sexual harassment, assault or abuse.	It is important we are aware of these wider studies and have a robust policy in place to address any issues arising.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	It is possible that staff who are disabled could be placed at a disadvantage when <ul style="list-style-type: none"> seeking to access this procedure, the grievance procedure or being subject to 	It is important that we keep our policy up to date and ensure any concerns are addressed at the earliest opportunity.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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				<p>disciplinary procedure resulting from an allegation.</p> <p>The policies as assessed mitigate that risk by clearly stating our commitment to offer reasonable adjustments during the process.</p> <p>Scope did a poll in 2017 asking disabled people about work experiences – it found a massive 53% of disabled people have experienced bullying or harassment at work, 21% had been bullied by colleagues and 27% from their employer. One in five (21%) go as far as not disclosing their impairment to employers, while 1 in 8 (13%) felt they had been overlooked for promotion.</p>				
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	It may be more challenging for those with a disability to initiate a complaint under the policy, however, support mechanisms are suggested in the policy to help with that.		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender (sex)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A study in October 2019 completed by the Young Women's Trust found that one in four young women are scared they will be sacked if they report sexual harassment. The TUC also completed a study finding that some two thirds of women had experienced harassment at work and one in three said they did not know how to report harassment. Anxieties about being sacked were 30% higher for young disabled women. 80% of respondents said they had been treated less positively by their employers	These statistics show how important it is to have a robust anti bullying and harassment policy in place that is well known and used and action is taken against bullies. The PSOW policy is in place to ensure that swift action is taken upon any report of harassment or bullying and that behaviours that fall short of expected standards are both challenged and addressed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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				because they had refused unwanted sexual advances, while 5% said they had to leave their job due to sexual harassment, assault or abuse.				
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A Stonewall report LGBT in Britain:Work Report 2018 found that almost 18% of LGBT people had been the target of negative comments or conduct from work colleagues in the previous year because they are LGBT. The study found: 12% of trans people had been physically attacked by customers or colleagues in the previous year because of being trans. 10% of black, Asian and minority ethnic LGBT staff had similarly been physically attacked in the previous year because of their sexual orientation and/gender identity compared to 3% of white staff. One in 5 trans people do not feel able to wear work clothes representing their gender expression. One in 5 trans people (21%) would not report transphobic bullying in the workplace.	Having the PSOW policy in place ensures that any issues emerging are dealt with properly, thoroughly and at the earliest opportunity.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage & civil partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	People in civil partnerships often face harassment by being excluded from work place conversations about family and weekends.	If any issues emerge, the PSOW provides a solid framework for these to be dealt with. Our values promote good team working and inclusivity to ensure no one feels left out.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy & maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Equality and Human Rights Commission commissioned a programme of research to investigate the prevalence and nature of pregnancy discrimination and disadvantage in the workplace. One in five Mothers said they had experienced harassment or negative comments related to pregnancy or flexible working from their employer and/or colleagues – if this was scaled to the general population this	Whilst we have not had any such claims at PSOW, our robust policy ensures there is a framework in place to address any such issues experienced or raised.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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				could mean as many as 100,000 mothers a year.				
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>There is the potential for misunderstanding of these policies by staff for whom Welsh or English are additional languages.</p> <p>This risk is very remote, as all PSOW staff have very good literacy level.</p> <p>Nevertheless, when using the cross cutting policies (grievance or disciplinary) to deal with allegations of harassment, Welsh will be used if Welsh is the first language and this is stated clearly in those policies.</p> <p>The 2019 Race at Work report found that one in four black, Asian, minority ethnic employees in the UK report experiencing bullying and harassment. Shockingly only 45% of employers have completed reviews into bullying and harassment in their workplace.</p>	Reference has been included in the introduction section of both policies (grievance and discipline) in relation to the use of the Welsh language in the process as it is those policies that are initiated if a claim of harassment or bullying is raised.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	We know from media reports and articles from the Equality and Human Rights Commission that National and International events, such as terrorism can cause harassment and bullying for people because of their particular religion or belief.	The PSOW policy provides a framework for dealing with such issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A Stonewall report LGBT in Britain: Work Report 2018 found that almost 18% of LGBT	The PSOW policy provides a framework for dealing with such issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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				people had been the target of negative comments or conduct from work colleagues in the previous year because they are LGBT.				
Welsh language	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>There is a risk that Welsh speakers will not be able to fully access or participate in grievance or disciplinary procedures in Welsh as a result of a claim of harassment being made.</p> <p>However, the policies as assessed mitigate that risk, as they comply with our Welsh Language Standards. The policies are available bilingually, and they state clearly that any formal part of these procedures can be undertaken in Welsh.</p>	The grievance and disciplinary policies are activated when an allegation of bullying or harassment is raised. The overarching policy provides a way for such issues to be addressed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Grievance Policy as assessed states that 'If any aspect of the grievance procedure causes the staff member difficulty because of any disability that they may have, or if they need assistance because English is not their first language, they should raise this issue with their line manager, their manager's manager or the HR adviser, who will make appropriate arrangements.' This section omits reference to Welsh, treating Welsh less favourably than English.</p> <p>Section 3 Principles outlines that grievances may be raised in Welsh or English and any member of staff will be able to use Welsh or English, in accordance with their preference in any formal part of this process. Any formal grievance will be handled and responded to in the language used by the person who submitted the grievance.</p>	This has been modified to include Welsh language provision in the introduction.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Socio-economic characteristics <ul style="list-style-type: none"> • rurality • low/no income • caring duties 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Potentially, there is a possibility that those with caring duties or those remote working can feel isolated and not able to join in local social events aimed at all staff.	No issues have been raised and the policy provides a framework for such concerns to be addressed. In addition our values promote inclusion in every way and therefore, issues such as these can be addressed at the earliest opportunity.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please record the evidence that you used to assess impact:

The policy itself has been designed to combat bullying, harassment and victimisation and so is meant to be a positive impact on equality and diversity and so there are no negative impacts of the policy itself.

Record of use of the Anti Bullying and Harassment Policy

These procedures are used very rarely within PSOW. In 2021/22, no one raised a formal claim of bullying or harassment under this procedure.

Further information

The ACAS Code of Practice was considered when updating this policy. In addition, the CIPD factsheets relating to Bullying and Harassment were considered. The information and advice included on the government website www.gov.uk/workplace-bullying-and-harassment was also considered.

EIA of other organisation

A range of other organisational EIAs has been reviewed to look at good practice and to understand the impact that Anti Bullying and Harassment processes may have on particular groups of people. e.g.

- Derby City Council

However, these assessments were all conducted by much larger organisations where the disciplinary process was used much more extensively than in case of PSOW.

Please record any consultation and engagement undertaken

12/01/23 Both Staff and TU

Outcomes report

EIA stage completed	<input checked="" type="checkbox"/>	Initial screening
	<input checked="" type="checkbox"/>	Full assessment
Summary of negative impacts identified		
Decision	<input checked="" type="checkbox"/>	Proceed – no changes
	<input type="checkbox"/>	Proceed – actions needed
	<input type="checkbox"/>	Do not proceed
Action plan	If actions are needed to proceed with the policy, project or decision, please specify here the actions, who is responsible for them and who will monitor how they are implemented.	
	Authorised by MT	Date 19/01/2023