

## EQUALITY IMPACT ASSESSMENT

<b>Procedure title:</b>	Dignity at Work Policy
<b>Procedure lead/ owner:</b>	HR Business Partner
<b>Others involved in EqlA assessment group</b>	Assessment group included: HR Adviser HR Business Partner
<b>Procedure implementation date:</b>	26/10/2024

### 1 Framing the Procedure

#### 1.1 Briefly describe the outcomes, aims and purpose of the Procedure:

This Procedure sets out the entitlements and support available to employees who wish to raise a complaint through the Dignity at Work Policy. Review of the policy has commenced in line with The Worker Protection (Amendment of the Equality Act (2010) Act 2023 which places a preventative duty on SRUC as the employer to actively prevent sexual harassment in the workplace.

The Procedure sets out the procedure for employees and managers in using the Dignity at Work Policy.

#### 1.2 Is the Procedure new or being changed, reviewed or stopped?

Review in line with legislation update.

#### 1.3 Who is affected by this Procedure?

All employees and to agency workers, volunteers and contractors who may not be directly employed by SRUC but are conducting work on SRUC's behalf. All rights and obligations which apply to employees in relation to Dignity at Work will also apply to these workers.

#### **1.4 Are there any other SRUC policies that may be affected by this Procedure?**

Special Leave, Maximising Attendance, Safe Leave Procedure, Dignity at Work Policy, Disciplinary Policy, Grievance Policy

#### **Evidence relevant to the Procedure including consultation**

The information you gather in this section will:

- help you to understand the importance of your Procedure/ practice/ process/ service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

**1.5 Evidence:** Set out in the table what you know about the experiences of people in terms of each equality group. Consider the diversity within each group (e.g. experiences of people from different religions or faiths) as well as the differences between groups. There may also be cumulative barriers experienced by people when you look at more than one group together (e.g. experiences of women of different minority ethnic groups, so the intersectional impact of sex and race).

You can add more rows to present the evidence if required.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the Procedure/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
<b>Age</b>	Internal data  <a href="#">TUC Survey Poll 2023</a>	<p>According to SRUC internal data, the highest proportion age range of employees are between 50–54 at 13.5% in 2022. This is followed by employees aged 55 to 59 at 12.1%.</p> <p>In 2021–22, the 31 to 35 years old age group had the highest incident rate for both victims (261 incidents recorded per 10,000 population) and suspected perpetrators (243 incidents recorded per 10,000 population).</p> <p>A TUC (2023) poll of more than 1000 woman revealed that 3 in 5 (58%) women state they have experienced sexual harassment at work – this figure increases in younger woman, with almost two-thirds (62%) of those aged between 25–34 reporting.</p>
<b>Disability</b>	<a href="#">Disability and domestic abuse - GOV.UK</a>	<p>In 2022, 83.6% of SRUC employees declared as having no known disability. This increased in 2023 to 83.9%. There is also a slight increase of the number of employees declaring a disability between 2022 and 2023, 7.2% to 7.8% respectively.</p> <p>Evidence from gov.uk shows disabled people experience disproportionately higher rates of domestic abuse. They also experience domestic abuse for longer periods of time, and more severe and frequent abuse than non-disabled people. They may also experience domestic abuse in wider contexts and by greater numbers of significant others, including intimate partners, family members, personal care assistants and health care professionals. Disabled people also encounter differing dynamics of domestic abuse, which may include more severe coercion, control or abuse from carers. Anybody who experiences domestic abuse may face broader risk factors, but disabled people face specific risks. They are often in particularly vulnerable circumstances that may reduce their ability to defend themselves, or to recognise,</p>

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the Procedure/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	<a href="#">Sexual Harassment of disabled woman in the Workplace: A TUC Report</a>	<p>report and escape abuse. Impairment can create social isolation, which, along with the need for assistance with health and care and the potential increased situational vulnerabilities, raises the risk of domestic abuse for disabled people. Physical and environment inaccessibility, stigma and discrimination can also exclude and isolate them. Their reliance on care increases the situational vulnerability to other people's controlling behaviour and can exacerbate difficulties in leaving an abusive situation.</p> <p>According to a report by the TUC (2021), nearly 7 in 10 (68%) of disabled woman have experienced a form of sexual harassment at work. This compares to around half (52%) of women in general according to a 2016 TUC report. Many women reported multiple harassment at work, over half (54%) had experienced two forms of sexual harassment, and 45% had experienced three forms of sexual harassment. In every type of sexually harassing behaviour (including jokes of a sexual nature, unwelcome sexual advances and unwanted comments about their body), disabled woman experienced this in higher numbers.</p>
<b>Race</b>	<a href="#">Domestic abuse – GOV.UK Ethnicity facts and figures</a>  <a href="#">Tackling Sexual Harassment in the Workplace: Recommendations for Employers: Fawcett.</a>	<p>Employees from certain ethnic groups may be less likely to discuss GBV with managers, and even less where the manager is male.</p> <p>According to a report produced by Fawcett (Tackling Sexual Harassment at Work), ethnic minority workers (men and women) reported higher rates (32%) of sexual harassment than their white counterparts (28%) over a twelve-month period.</p>

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	<a href="#">Racism Ruins Lives: An Analysis of 2016/2017 Trade Union Congress Racism at Work Survey</a>	<p>The TUC's report on racism at work 'Racism Ruins Lives' based on findings from its 2016/2017 survey found that over 70% of Asian and Black workers reported that they had experienced racial harassment in the five years prior.</p> <p>The evidence suggests that employees from ethnic background may experience higher levels of harassment but also be less likely to report any abuse.</p>
<b>Sex</b>	<p>Internal Data</p> <p><a href="#">Violence against women and girls – Office for National Statistics (ons.gov.uk)</a></p> <p><a href="#">Experiences of harassment in</a></p>	<p>In 2022 57.7% of SRUC employees identify as female, 40.2% as male, 0.2% identify as other and just over 2% of employees prefer not to say. In comparison 51% of Scotland's population are women, 49% are men.</p> <p>The definition of Violence Against Women and Girls" Any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life".</p> <p>Crime types such as domestic abuse including homicide, sexual assault, stalking, sexual exploitation, child abuse, female genital mutilation (FGM), forced marriage and harassment in work and public life are all forms of abuse covered by our VAWG terminology.</p> <p>Research suggests <a href="#">Male victims position paper (March 2019) (accessible version) – GOV.UK (www.gov.uk)</a> that males are less likely to report instances of GBV for a number of reasons</p>

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the Procedure/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	<a href="#">England and Wales: December 2023</a>  <a href="#">Government Equalities Office 2020 Sexual Harassment Survey</a>	<p>According to a report by the Office of National Statistics in December 2023 on data in England and Wales, more woman (13%) than men (7%) experienced at least one form of harassment. Of those experiencing harassment 8% of woman experienced sexual harassment and 3% of men. A quarter of people who had experienced sexual harassment had done so at work.</p> <p>However, it is important to note that sexual harassment does happen to men. Data from the Government Equalities Office 2020 Sexual Harassment Survey found that 29% of those in employment experienced some form of sexual harassment in their workplace within the previous 12 months and men were almost as likely as women to have experienced this, with the incident rate at 30% for women and 27% for men.</p>
Gender Reassignment	<a href="#">Gender-based Violence   GenderTrust.org.uk</a>	<p>Research shows <a href="#">Gender-based Violence   GenderTrust.org.uk</a> that as transgender issues have become more mainstream in recent years, there has been an increase in trans individuals reporting incidents of gender-based violence. The increase in reporting may suggest that there is a rise in incidents or trans individuals feel more confident about reporting gender-based crimes.</p> <p>Internal data is limited in relation to this characteristic, however SRUC has implemented more robust reporting and recording systems and has introduced a reporting mechanism which has the option to report anonymously.</p>
Sexual orientation	<a href="#">Gender-based violence: lesbian and transgender women face the highest risk</a>	<p>There is evidence to suggest that lesbian, bisexual, and transgender women <a href="#">face disproportionate levels of violence</a> at the hands of both strangers and intimate partners. A recent <a href="#">U.N. human rights report</a> noted that LGBT people are at a disturbingly elevated risk of homicidal violence, highlighting the increased risk that</p>

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the Procedure/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	<p><a href="#">but get the least attention (worldbank.org)</a></p> <p><a href="#">LGBT harassment at work widespread, TUC survey suggests</a></p>	<p>lesbian, bisexual, and transgender women face because of gender-based discrimination.</p> <p>There is limited evidence however to show UK statistics.</p> <p>A 2019 TUC survey of 1151 LGBTQ+ employees found that over two-thirds have been sexually harassed at work. According to the survey, of the 68% who said they had experienced sexual harassment, 66% did not tell their employer, sometimes because they were afraid of being "outed". SRUC has a reporting mechanism with provision for anonymous reporting, which is encouraged over and above the absence of any reporting.</p>
<b>Religion or Belief</b>	<p><a href="#">Gender-based violence, religion and forced displacement: Protective and risk factors – University of Birmingham</a></p>	<p>Religion acted as both a “protective” and “risk” factor for GBV experiences. Religious beliefs were assets in coping with GBV experiences, but also contributed to creating an environment in which violence was normalized, exposing women to further harm. Religious practices supported survivors emotionally to cope with GBV but also some practices posed risks. Religious organizations in many cases served as a lifeline for many displaced women, offering practical and emotional support, however religious leaders at times encouraged survivors to stay in abusive relationships. Religious experiences “empowered” and “disempowered” survivors across the processes of forced migration.</p> <p>Religion or belief is a protected characteristic under the Equality Act 2010. Harassment or bullying, including sexual harassment towards people with this characteristic is unlawful. SRUC holds limited internal data in relation to religion or belief and sexual harassment to draw significant assumption. SRUC has policies and</p>

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the Procedure/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		processes in place to protect all staff, students and third parties to ensure a safe working environment free from discrimination.
Pregnancy or maternity	<a href="#">Violence and abuse in pregnancy   Ready Steady Baby! (nhsinform.scot)</a>  <a href="#">Pregnancy and maternity discrimination research findings</a>	<p>There is a higher chance of unwanted pregnancies for individuals who have experienced GBV. You may feel pressured by family members or the wider community to arrange FGM for your daughter. FGM is against the law in the UK.</p> <p>A 2018 Equality and Human Rights Commission report found One in five mothers said they had experienced harassment or negative comments related to pregnancy or flexible working from their employer and / or colleagues.</p>
Marriage or civil partnership	<a href="#">Domestic abuse: statistics recorded by the police in Scotland - 2021/22 - gov.scot (www.gov.scot)</a>	<p>In domestic abuse cases in Scotland in 2021-22, just under nine-in-ten (89%) of all domestic abuse incidents occurred in a home or dwelling.</p> <p>In 2021-22 half (50%) of domestic abuse incidents, where the relationship between the victim and suspected perpetrator was known, were between current partners. Just under half (49%) of incidents were between ex-partners. For the remaining 1% of incidents, the relationship was categorised as 'Other'</p>

**1.6 Consultation and stakeholder involvement:** Speaking to people who will be affected by your Procedure/ practice/ process/ service can help clarify the impact it will have on different equality groups. Describe below what you learned from the consultation/ involvement. Consultation can take time so make sure that you build this into your Procedure review/ development timeline.

This Dignity at Work was previously reviewed with feedback from our recognised Trade Unions. The launch of the inform and support has involved representatives from HR and Education.



**1.7 Record here if you need to undertake a full equality impact assessment based on your evidence above.**

<b>Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics</b>	<b>Yes/ No (Y or N)</b>	<b>Next steps</b>
There is no relevance to equality	No	Proceed to sign off (step 5) to agree with decision makers that no EqlA is required based on current evidence
There is relevance to some or all of the equality groups	Yes	Proceed to Step 3: complete full EqlA
It is unclear if there is relevance to some or all of the equality groups	Yes	Proceed to Step 3: complete full EqlA

## **2 Impact on equality groups and changes to Procedure**

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- **Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010?**
- **Is there potential to advance equality of opportunity between people who share a characteristic and those who do not?** How can this be achieved?
- **Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not?** How can this be achieved?

**2.1 Does the Procedure have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?** In the tables below, record the impact of the Procedure, as it is planned or as it operates, might have on

each equality characteristic and describe what changes in Procedure or actions will be required to mitigate that impact or to take advantage of a positive impact.

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
Age	Potential for discrimination			X	<p>The procedure applies to all employees of SRUC employees regardless of ages. The evidence does show the increase in numbers for women and young children and therefore the procedure should be launched on a range of platforms and advice given throughout the organisation (posters, yammer)</p> <p>The inform and support is open to anyone associated, contracted or visiting SRUC. This may include students and younger visitors. The inform and support report tool will be triaged by the HR management team, who will work within the terms of our safeguarding policy and in collaboration with the safeguarding team where appropriate.</p>
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
Disability	Potential for discrimination	X			<p>The evidence shows that individuals with disability status are more likely to experience harassment.</p>
	Potential to advance equality of opportunity	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
	Potential to foster good relations	X			<p>The policy uses inclusive language. The policy is formatted to promote accessibility. The policy also offers the employee to access alternative formats. The policy will be published with the option of immersive format and accessibility mode.</p> <p>HR drop in sessions have been offered to employees, this will give employees the option of attending sessions (online and F2F) this will hopefully encourage employees to ask advice and support. The inform and support has been made accessible on the external website to ensure accessibility at any time.</p>
<b>Race</b>	Potential for discrimination			X	<p>SRUC does not restrict access to the policy based on this protected characteristic. SRUC are aware that employees within this protected characteristic may be less likely to report an incident of harassment, to counter this SRUC have ensured that reporting can be made anonymously and is raising</p>
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					<p>awareness to the platform and support available through a range of different internal comms.</p> <p>Managers guidance and support will be made available throughout the policy and supporting documents for all employees to access in a range of ways.</p>
<b>Sex</b>	Potential for discrimination			X	<p>The inform and support form offers anyone reporting an incident to raise a concern anonymously or to be contacted by a female or male colleague. This is to ensure that anyone raising concerns feels comfortable and supported throughout the process.</p> <p>The evidence shows that woman and children are more likely to experience harassment. The guidance is aimed at all employees and also offers individuals the opportunity to discuss any details with a member of HR should they not feel comfortable with discussing it with their line manager.</p>
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
	Potential for discrimination			X	

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
<b>Gender Reassignment</b>	Potential to advance equality of opportunity			X	<p>SRUC does not restrict access to the Procedure based on this protected characteristic.</p> <p>The inform and support form offers anyone reporting an incident to raise a concern anonymously or to be contacted by a female or male colleague. This is to ensure that anyone raising concerns feels comfortable and supported throughout the process.</p> <p>The Procedure uses gender neutral language throughout.</p>
	Potential to foster good relations	X			
<b>Sexual orientation</b>	Potential for discrimination			X	<p>SRUC does not restrict access to the Procedure based on this protected characteristic. The procedure will be launched and promoted in a range of areas throughout SRUC.</p> <p>The inform and support form offers anyone reporting an incident to raise a concern anonymously or to be contacted by a female or male colleague. This is to ensure that anyone raising concerns feels</p>
	Potential to advance equality of opportunity			X	
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					comfortable and supported throughout the process. The Procedure uses gender neutral language throughout.
<b>Religion or Belief</b>	Potential for discrimination			X	SRUC does not restrict access to the Procedure based on this protected characteristic. The procedure will be launched and promoted in a range of areas throughout SRUC.
	Potential to advance equality of opportunity			X	
	Potential to foster good relations	X			
<b>Pregnancy or maternity</b>	Potential for discrimination	X			SRUC does not restrict access to the Procedure based on this protected characteristic. SRUC offers a range of support mechanisms for employees, including an enhanced range of family friendly leave policies.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
<b>Marriage or civil partnership</b> (in employment)	Potential for discrimination			X	SRUC does not restrict access to the Procedure based on this protected characteristic. The procedure will be launched and promoted in a range of areas throughout SRUC.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					SRUC offers employees support through the Safe Leave Policy

**2.2 Think about and describe below how your assessment impacts on your Procedure review/ development timeline including but not limited to:**

- Procurement criteria: do you need to include specific equality criteria as part of the technical specification?
- Communication plan/ products: do you need to communicate with people affected by this Procedure/ practice/ service/ process in a specific format (e.g. audio, subtitled video, different languages)?
- Cost: do you propose any actions because of this assessment which will incur additional cost?
- Resources: do the actions you propose require additional or specialist resource to deliver them?

**2.3 Record the outcome of this assessment below having considered the potential or actual impacts of your Procedure/ practice/ process/ service on equality groups.** Choose from one of the following (mark with an X or delete as appropriate):

**Note: You must take action to remove barriers or take advantage of positive opportunities BEFORE the Procedure goes live.**

Please select (X)	Implications for the Procedure/ practice/ process/ service
X	<b>No major change:</b> Your assessment demonstrates that the Procedure service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.

	<b>Adjust the Procedure:</b> You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the Procedure when implemented.
	<b>Continue the Procedure:</b> The Procedure will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.
	<b>Stop and remove the Procedure:</b> The Procedure will not be implemented due to adverse effects that are not justified and cannot be mitigated.

### 3 Monitoring Procedure impact and further actions

It is important to continue to monitor the impact of your Procedure/ practice/ process/ service on equality groups to ensure that your actual or likely impacts are those you recorded. Your monitoring information will also inform a future review of the Procedure.

#### 3.1 Record in the table below how you intend to monitor the impact of this Procedure/ practice/ process/ service on equality groups. In the table below you should:

- list the relevant measures,
- Identify who or which team is responsible for implementing or monitoring any changes
- Where the measure will be reported to (e.g. committee, ELT, Board) and how often.

Measure	Lead department/ individual	Reporting (where/ frequency)
Reporting of incidents to ELT	HR	Annual, in line with Academic/SRUC financial year
Ongoing monitoring of incidents being reported	HR	Ongoing as reports are made /monthly



Uptake of mandatory eLearning module	HR	Quarterly
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**3.2 Record further actions or changes required after the Procedure is implemented in the table below. Make it clear if there are no outstanding actions.**

Action	Lead department/ individual	Action target date
Offer the option of male or female contact for those reporting incidents through the report and support platform	HR	October 2024 – complete
Design and share posters for Campuses to be displayed in staff areas and private spaces.	HR	Posters – September – complete Sent to Campuses – End December 2024
Create confidential mailbox to ensure anonymity can be offered for reporting	HR/IDS	October – complete
Guidance on the inform and support for employees, to ensure a clear understanding guidance is required.	HR	October – complete
Mandatory eLearning module for all employees – to raise awareness of the changes in legislation eLearning to be designed and rolled out on Metacompliance.	HR	October – complete
Update “New Employee Welcome Pack” with changes in legislation to raise awareness to new employees joining SRUC	HR	September – complete
Introduce a visitor’s statement on SRUC policy – to make visitors to the campus aware of policies and expectations on SRUC campus/offices.	HR, Academic, CES	December 2024

Introduce a risk assessment to be rolled out throughout SRUC	ELT, SLT HR	September – complete
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#### 4 Sign off and future review

Equality impact assessments must be signed off by the relevant Head of Service/ Department, even where an EqIA is not required. Also note here when you plan to review the Procedure and accompanying EqIA which should be no later than 5 years from Procedure implementation.

##### 4.1 Senior Responsible Owner/ Committee sign off.

Job/ Committee title: Chief People Officer

Date: 12/11/2024

##### 4.2 Equality impact assessment review date.

Date: 12/11/2029

**Important:** You must send the final version of this equality impact assessment to:

- the Equality Diversity & Inclusion Lead.
- the Communications team for publication on SRUC's equality page on the external website.

Document control		
Document control:		V0.1
Date Procedure live from:		10/2024
Review/ Approval Group:		Human Resources
Last reviewed:		10/2024
Review cycle:		No more than five years
Document change log		
Version/ Author	Date	Comment

VO.1 / Senior HR BP	01/04/2025	
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