

# Equality Policy

## Document Control

Document Ref:		Date Created:	September 2015
Version:	1.0	Date Modified:	June 2025
Revision due	September 2018		
Author:	Rachel Craggs	Sign & Date:	
Owning Service	Strategic Support		
Equality Impact Assessment: (EIA)	Date undertaken:		
	Issues (if any):		
Chief Executive	Sign & Date:		
Corporate Director (Community Services)	Sign & Date:		
Corporate Director (Children & Young People)	Sign & Date:		
Corporate Director (Environment)	Sign & Date:		

## Change History

Version	Date	Description	Change ID
1.1	11/1/18	Adoption of International Holocaust Remembrance Alliance working definition of anti-Semitism at point 3.4.9	
1.2	4/6/25	Updated to include Dignity in Employment Policy	
1.3			



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## 1. Purpose

- 1.1 The purpose of this Policy is to set out West Berkshire Council's vision and commitment to equality of opportunity and respect for diversity. This is in relation to our role as a provider of quality services to the people who live, work and visit West Berkshire, as a significant employer in the local economy and in our community leadership role.
- 1.2 This Policy provides a broad statement of the Council's expectations and responsibilities in relation to equality, and is a reflection of our requirements under current equalities legislation.
- 1.3 The overall aims of this Policy are to:-
  - Eliminate unlawful discrimination;
  - Promote equality of opportunity;
  - Promote equality of access;
  - Demonstrate that we value diversity; and
  - Promote good relations between diverse communities.
- 1.4 These aims will be achieved by promoting and demonstrating fairness and equality of opportunity in:
  - 1.4.1 The provision of services, which relates to:
    - Access to services;
    - Treatment while accessing and receiving services;
    - Equal quality of service offered;
    - Outcomes for all service users.
  - 1.4.2 The employment of staff, which relates to:
    - Fair Access to jobs;
    - Fair treatment in employment;
    - Fair access to training and development opportunities.
    - The right of every employee:-
      - Not to be discriminated against, harassed, victimised or bullied;
      - Not to discriminate, harass, victimise or bully another employee;
      - To make a complaint when they feel they have been unfairly treated, harassed or bullied and to have their complaints acted upon;
      - To challenge and bring discriminator acts and behaviour to the attention of an appropriate person for action;
      - To be respected and valued for who they are and for what they contribute.
  - 1.4.3 Promote equality and diversity through community leadership including procurement and commissioning systems and processes that are:
    - Fair
    - Accessible to all
    - Transparent
    - Consistent with our public sector equality duty.
  - 1.4.4 Achieving progress against our equality objectives, which are based around addressing any inequality in the:

- Provision of services.
- Employment of staff.
- Procurement and commissioning processes.

## **2. Applicability**

2.1 This Policy applies to:

- 2.1.1 Services provided to local residents and visitors to West Berkshire and all those who use council services.
- 2.1.2 All non-school based employees working for the Council, including those working from home or at non-Council locations. Policies relating to school based employees are the responsibility of the Governing Body and will have been put in place accordingly.
- 2.1.3 Other persons including elected members, consultants, agency staff, contractor and contractors' staff working for the Council, and external organisations working with the Council, whilst engaged on Council business

2.2 It is the responsibility of each employee and other persons mentioned in Section 2.1 to familiarise themselves with and adhere to this Policy.

2.3 This Policy has undergone internal and external consultation including with Heads of Service and trade unions and has been ratified by the Executive Member for Equalities.

## **3. Policy**

3.1 West Berkshire Council recognises that the needs of our service users and employees are diverse and that we must consider these differences when developing our activities. We understand that one size does not fit all, and we strive to develop services and practices that will be suitable for all.

3.2 We are committed to ensuring that equality and diversity lie at the heart of our services and employment practices and will work to remove the barriers that limit access and opportunity. We welcome and embrace the strength and resilience that diversity brings to the district.

3.3 We endeavour to treat our service users, employees, and contractors with respect and dignity and according to the framework set out in legislation. We recognise that there are groups and individuals in society who are disadvantaged and discriminated against. We will ensure that no one is treated less fairly on the grounds of age, disability, gender, gender identity, marriage/civil partnership, pregnancy/maternity, race, religion/ belief, sexual orientation, or on any other grounds, as set out in legislation, which cannot be justified.

3.4 In order to meet our aims, West Berkshire Council will:

- 3.4.1 Ensure a continuing strategic lead for equalities supported by appropriate policies and guidance;
- 3.4.2 Have regard to our obligations under relevant legislation, particularly the Equality Act 2010;
- 3.4.3 Place residents and service users at the heart of policies and strategies in all our activities
- 3.4.4 In the formation of our policies and services, have due regard to the need to consider people from all communities and promote equality and good relations between people who share a relevant protected characteristic and people who do not share it;
- 3.4.5 Engage with and listen to all sections of the community in identifying needs and in decisions on the way services are designed, planned and delivered;
- 3.4.6 Ensure that Members and staff at every level of the organisation understand what equality in service provision means and apply it in their roles;
- 3.4.7 Promote an environment free from discrimination, victimisation, bullying and harassment, and tackle behaviour in contravention of this;
- 3.4.8 Recognise and value the differences and individual contributions that people make.
- 3.4.9 Formally adopt the following International Holocaust Remembrance Alliance working definition of anti-Semitism: "Anti-Semitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of anti-Semitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities."

#### **4. Roles and Responsibilities**

- 4.1 The Members of Council accept that they are accountable to all sections of West Berkshire's population for delivering equality of opportunity in all its activities. As decision makers they are responsible for discharging the Council's Public Sector Equalities Duty.
- 4.2 The Chief Executive is responsible for providing leadership in the implementation of this Policy and for ensuring that service planning and performance management systems incorporate specific equality objectives in terms of service delivery and employment.
- 4.3 All Corporate Directors and Heads of Service are responsible for implementing the Policy in their service areas, allocating specific resources to ensure the delivery of equality objectives.
- 4.4 All Managers are responsible for implementing the Policy and for addressing equalities issues in the business planning and performance management arrangements for their area of activity. They are also responsible for ensuring their staff act in accordance with the provision of this Policy, providing all necessary

support and direction for their staff. In addition, when working with Volunteers, Managers are responsible for ensuring they are aware of the requirement to comply with the Policy and that they take action if it becomes evident that they are not complying.

- 4.5 All employees are responsible for ensuring that they play their part in implementing this Policy. This includes taking into consideration the impact on service users, and consulting effectively with them when designing new policies or services, evidenced through an Equality Impact Assessment where appropriate. They are also responsible for treating customers and colleagues fairly and with respect and promoting equality of opportunity within the Council, and externally with Customers, Communities and Partners.
- 4.6 The Council will promote its shared principles around equality and diversity when working with Contractors, Suppliers and Partners. This is to ensure they are clear about their obligations to provide services that are free from discrimination, harassment and victimisation. The Council will routinely check their policies to ensure they comply and they will take action if it becomes evident that they are not complying. However, its Contractors, Suppliers and Partners' will remain accountable for their own practice.

## **5. Failure to comply with the Equality Policy**

- 5.1 Any cases of harassment, discrimination, bullying or victimisation will be taken very seriously by the Council.
- 5.2 Job applicants and service users who feel they have been subject to unfair discrimination can make a complaint under the Council's Complaints Procedure. This can be located on the West Berkshire Council website under the following link <http://info.westberks.gov.uk/index.aspx?articleid=27928>.
- 5.3 Employees who feel they have been subject to unfair discrimination can raise the issue informally with their line manager, or formally under the terms of the Council's Grievance Procedure.
- 5.4 Employees who are alleged to have committed an act of unfair discrimination or harassment may be liable to disciplinary action in accordance with the Council's Disciplinary Procedure.

- 5.5 Any individual or organisation working for the Council who commits an act of unjustified or unlawful discrimination, or allows discrimination to occur without taking appropriate action, may have their contract terminated.
- 5.6 Anyone to whom this Policy applies, who commits an act of unjustified or unlawful discrimination, or allows discrimination to occur without taking appropriate action, may be liable to a claim being brought against them by the victim in the Tribunal and/or Civil Court.

## **6. Review**

- 6.1 This Policy will be reviewed to respond to any changes at least every 3 years.
- 6.2 The Including Everyone Board is responsible for reviewing and maintaining this Policy.

## **7. Further Documentation**

- 7.1 Equality Act (2010)
- 7.2 Non-statutory guidance on the Equality Duty (Equality and Human Rights Commission)
- 7.3 Equality Impact Assessment Guidance (West Berkshire Council)
- 7.4 Equality Objectives 2015-19 (West Berkshire Council)
- 7.5 Consultation Policy (West Berkshire Council)

## **8. Appendices**

Appendix A - Dignity in Employment Policy (West Berkshire Council)

# Employment Policy: Corporate Staff

**Document Title: Dignity in Employment Policy**  
**Issue Date: June 2025**

**Version No 4**

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## Change History

Version	Date	Change
2	May 2025	Updated name of policy Inclusion of Worker Protection Act 2023 amendment to Equality Act 2010 Inclusion of interactions with other policies Appendix a – key definitions of language Appendix b – model WPA risk assessment



## 1. INTRODUCTION

- West Berkshire Council is proud of the values it has and aims to ensure that these are embedded in all employment related policies, procedures and ways of working.

### OUR VALUES ARE



- Our values are central to achieving our vision and delivering outcomes for West Berkshire. In addition, the Council implemented a new Behaviour Framework for all employees (except for those employed in schools) during 2023.
- Centred around the Behaviour Frameworks, our policies underpin the people practices within West Berkshire and provide a framework that details the approach and expectations required of all staff, clearly defining the behaviours required.



## **2 PURPOSE**

West Berkshire Council is committed to creating and maintaining a work environment that is fair, promotes dignity and inclusion, and is free from sexual harassment. We believe all employees have the right to work in an environment that promotes equality, dignity, and respect. This policy complies with the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023, reflecting our commitment to preventing sexual harassment in the workplace.

The purpose of the Dignity in Employment policy is to outline West Berkshire's approach to these elements and to ensure fairness, dignity and inclusion at work; highlighting relevant procedures; where to find further information; and the potential impact of not following the policy.

## **3 SCOPE**

- 3.1 This policy applies to all employees, volunteers, agency staff, temporary workers, and anyone under a contractual or employment relationship with West Berkshire Council, excluding employees of West Berkshire schools.
- 3.2 It extends to all West Berkshire Council premises, work-related events, business trips, and any situation where the individual is representing West Berkshire Council
- 3.3 This policy is non-contractual and may be updated at any point to reflect changes in areas such as legislation, best practice and Council requirements.
- 3.4 Key definitions of language used within this document can be found in Appendix A

## **4 RESPONSIBILITIES**

All those involved in the work of West Berkshire Council are responsible for contributing to a respectful and inclusive work environment, in line with our Behaviour Framework

- 4.1 The Council's Senior Leadership Team are responsible for:
  - Ensuring the Council meets its legal obligations and that everyone should be treated fairly, in particular in relation to protected characteristics within the Equality Act 2010.
  - Zero tolerance for sexual harassment and embedding a culture promoting dignity and respect.
  - Setting the tone for acceptable behaviours and taking appropriate action when unacceptable behaviours are evident

#### 4.2 HR are responsible for:

- Ensuring employment policies, procedures and practices reflect relevant employment legislation
- Carrying out Equality Impact Assessments on new HR policies
- Promoting awareness-raising activities including training and education for employees and managers
- Offer support to managers and employees
- Collect and review anonymised demographic data, which will be analysed to track progress and identify initiatives to improve employee experience

#### 4.3 People managers are responsible for:

- Ensuring all employees are supported and treated equitably
- Treating others with respect and dignity; and not harass, bully and/or victimise others
- Ensuring related policies and procedures are followed and applied fairly for all employees
- Undertaking relevant risk assessments in relation to the Worker Protection Act 2023
- Ensuring all employees complete all mandatory EDI and Worker Protection Act training, as appropriate to their roles and responsibilities, and support attendance at employee networks, where appropriate
- Setting the tone for acceptable behaviours and taking appropriate action when unacceptable behaviours are evident in their team

#### 4.4 Employees are responsible for:

- Ensuring all colleagues are supported and treated equitably, in line with our Behaviour Framework
- Fully complying with relevant policies and procedures
- Reporting any inappropriate behaviours through their line managers and/or other appropriate reporting channels
- Treating others with respect and dignity; and not harass, bully and/or victimise others

#### 4.5 Volunteers, casual workers and contractors are responsible for:

- Fully complying with relevant policies and procedures
- Reporting any inappropriate behaviours through their line managers and/or other appropriate reporting channels
- Treating others with respect and dignity; and not harass, bully and/or victimise others

## 5 RECRUITMENT

West Berkshire council is committed to diversity, equity, and inclusion in our recruitment process, ensuring fair and equal opportunities for all candidates. As a Disability Confident Employer, we provide support and adjustments for candidates with disabilities throughout the recruitment process.

Upon appointment, we offer a range of employee networks to support and connect our diverse workforce, fostering an inclusive environment where all individuals are evaluated based on their skills, experience, and potential.

## 6 DATA

We collect demographic data to better understand and promote diversity in our workforce. This data is collected voluntarily, kept confidential, and used solely for monitoring and improving diversity and inclusion efforts.

EDI employment data is published annually and is submitted to the Personnel Committee.

West Berkshire Council is committed to equal pay for equal work with clear pay bands and a job evaluation scheme which ensures a consistent approach in setting pay. As an employer of more than 250 people the Council is required to [publish data on the gender pay gap](#) and report specific figures about their gender pay gap – the difference between the average (mean and median) earnings of males and females, expressed relative to males' earnings.

## 7 POLICY

7.1 The council recognises the unique contribution each employee can make and will promote a climate of respect for all, requiring all employees to treat each other with fairness, dignity and respect. We will take a zero-tolerance approach to bullying, any form of harassment, including sexual harassment, and victimisation.

7.2 The council will oppose any form of discrimination against job applicants or employees on the grounds of any protected characteristic.

These protected characteristics are:

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

- 7.3 The council will ensure all employment policies and practices, including recruitment and selection; learning and development, promotion and pay are non-discriminatory, in line with relevant employment legislation and best practice

The council will take reasonable steps to prevent the sexual harassment of employees and takes a zero-tolerance approach to any finding of such behaviour. All staff will undertake mandatory training and the Council will ensure that we have appropriate risk assessments in place to mitigate occurrences (see Appendix B).

## **8. BREACHES OF POLICY**

- 8.1 Individuals who feel they have been subject to unfair discrimination during the recruitment process can make a complaint under the Council's Complaints Procedure.
- 8.2 Any employee who feels they have been subject to unfair discrimination can raise the issue informally with their line manager, or another manager if appropriate, or formally under the terms of the council's Grievance Procedure.
- 8.3 Employees who are alleged to have committed an act of unfair discrimination may be liable to disciplinary action in accordance with the council's Disciplinary Procedure.
- 8.4 Employees who are alleged to have committed an act of sexual harassment may be liable to disciplinary action in accordance with the council's Disciplinary Procedure and may also be liable to a criminal investigation, depending on the severity of the conduct.

## **9. INTERACTIONS WITH OTHER POLICIES**

This policy should be read in conjunction with the following supporting procedures that detail entitlements to equitable treatment:

- Additional leave procedure
- Annual leave procedure
- Additional leave procedure
- Behaviour Framework
- Council's complaints procedure
- Disciplinary procedure
- Employee Wellbeing Principles
- Family Friendly Policy Statement
- Flexible Working Procedure
- Grievance Procedure
- Hybrid Working Policy
- Learning and Development Policy
- Maternity and Adoption Policy
- Officer Code of Conduct

- Organisational Change Policy
- Performance Management Policy
- Personal Relationships at Work Policy
- Reasonable adjustments procedure
- Recruitment Policy
- Workplace Attendance Procedure
- Whistleblowing Policy

## **10 RELEVANT LEGISLATION**

10.1 This policy complies with the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023.

10.2 This policy supports the council's responsibilities in relation to the Public Sector Equality Duty under section 149 of the Equality Act 2010. The duty states that:

- A public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and other conduct that is prohibited by or under the Equality Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

These protected characteristics are:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex
9. Sexual orientation

## **11 EQUAL OPPORTUNITIES ASSESSMENT**

11.1 This policy considers all staff groups and promotes equality in the application of performance management activities.

## Appendix A – Key Definitions of Language used throughout this document

**Equality:** Equality is a term used to denote when all are treated equally regardless of need. This means, for example, equal and fair access to opportunities, training and participation.

**Equity:** Equality and equity both promote fairness. Equity acknowledges that we don't all start from the same position in life and looks to change systems and processes for individuals in relation to their specific needs to ensure opportunities can be accessed equally.

**Diversity:** This means a group of people comprising of different backgrounds, qualities and perspectives

**Inclusion:** Denotes an approach in which all individuals in a group are treated with respect and fairness in relation to opportunities, resources and development. All are valued for who they are and their own specific contributions.

**Inappropriate behaviour:** Unacceptable behaviour means acting in a way that is unreasonable, regardless of the level of someone's stress, frustration, or anger. It may involve acts, words or physical gestures that could cause another person distress or discomfort.

**Harassment:** Harassment is when someone repeatedly behaves in a way that makes a person feel scared, distressed or threatened.

**Sexual Harassment:** Sexual harassment is defined as unwanted sexual behaviours that make someone feel upset, scared, offended, or humiliated, or create an intimidating, hostile, degrading, humiliating, or offensive environment.

**Examples of Sexual Harassment:** Sexual harassment takes many forms. While this is not an exhaustive list, examples include:

- Serious assault;
- physical conduct of a sexual nature, unwelcome physical contact or intimidation, and invading someone's personal space;
- intrusive questions or remarks about a person's sex life;
- persistent suggestions to meet up socially after a person has made it clear they do not welcome such suggestions, even if they have attended previously
- showing or sending offensive or pornographic material by any means (e.g., by text, whatsapp, video clip, email, or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, flirting or gender-related insults;
- offensive comments about appearance or dress, innuendo, or lewd comments;
- leering, whistling, or making sexually suggestive gestures;
- staring
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours
- stalking

**Intent:** Sexual harassment can occur regardless of the perpetrator's intent to cause discomfort or create a hostile environment.

# Employment Policy: Corporate Staff

**Document Title: Dignity in Employment Policy**

**Version No 4**

**Issue Date: June 2025**

## Appendix B: Corporate Risk Assessment: Worker Protection Act 2023 and sexual harassment

<b>Directorate</b>	All					
<b>Service</b>	All					
<b>Team</b>	All					
<b>Job, Activity or Task</b>	Workplace sexual harassment					
<b>List the Hazards?</b>	<b>Who might be harmed &amp; how?</b>	<b>What are you already doing to lower risks?</b>	<b>Any further action needed?</b>	<b>Action by Whom?</b>	<b>Action by when?</b>	<b>Date complete</b>
<b>Work Environment</b>						
<b>Lone &amp; night working</b>	Staff working alone, increased risk of harassment	Risk assessments, lone worker app, regular check-ins, Clients of Concern register	Provide learning on handling harassment during lone work	Team Managers/Line Managers		
<b>Out-of-hours working</b>	Staff working outside usual business hours	Lone worker app, regular check-ins, reporting procedures	Develop team emergency response for immediate harassment situations	Team Managers/Line Managers		
<b>Remote work &amp; digital harassment</b>	Employees experiencing inappropriate	Virtual meeting dress code, professional	Implement policies for digital harassment prevention	IT & HR		



	behaviour in virtual settings	communication guidelines				
<b>Sexualised or inappropriate material or images on display in the physical or virtual workplace.</b>	All employees and workforce	Non work related materials, images, clothing should not be on display unless authorised by a manager.  Behaviour Framework  Officer code of conduct.	The manager should consider whether the material is likely to offend anyone working on the premises.	Line Managers and Senior managers. Facilities Team		
<b>Workplace Requirements and Behaviour</b>	<b>Who might be harmed &amp; how?</b>	<b>What are you already doing to lower risks?</b>	<b>Any further action needed?</b>	<b>Action by Whom?</b>	<b>Action by when?</b>	<b>Date complete</b>
<b>Customer/service user or visitor facing duties</b>	Staff interacting with customers, visitors and service users	Behaviour Framework, mandatory training, Lone Worker App, Dignity at Work Policy  Clients of Concern register  Visitor booking procedures are in place and visitors are not alone on premises.	Promote customer charter. Further develop customer facing materials relating to sexual harassment and other harassment setting out that it is not tolerated.	Line Managers  HR		

<b>Travel for work</b>	Staff traveling together, risk of inappropriate behaviour	Risk assessments, private accommodations, confidential reporting Behaviour Framework	Enhance learning on professional conduct while traveling	HR & Management		
<b>High-risk events (e.g., elections, social tensions)</b>	Staff facing increased harassment risk	Customer charter, Electoral Commission guidance	Implement Worker Protection Act training	HR		
<b>Attendance at external events</b>	Staff socialising outside office	Private accommodations arranged and risk assessments needed	Develop detailed risk assessment for offsite events	Team Manager/Line Manager		
<b>Alcohol at work social events</b>	Staff at risk of inappropriate behaviour	Events not compulsory, consider alcohol-free alternatives, team behaviour reminders	Review drugs and alcohol policy	HR & Line Manager		
<b>Social media contact and sharing of personal mobile phone numbers between employees etc.</b>	Risk of inappropriate digital interactions	No requirement to share personal contacts, Officer code of conduct.  All to be aware of social media links and agreeing to friend requests etc.  Whatsapp groups and other social media groups are an extension of the workplace, and the same standards apply.	Review of training records, reminders that this is an extension of the workplace and Dignity at Work policy, Behaviour Framework still applies.	Team Manager/Line Manager		

		Personal emails should only be blind copied.				
<b>Workplace composition and Structures</b>	<b>Who might be harmed &amp; how?</b>	<b>What are you already doing to lower risks?</b>	<b>Any further action needed?</b>	<b>Action by Whom?</b>	<b>Action by when?</b>	<b>Date complete</b>
<b>Power imbalances</b>	Staff reporting to managers	Mandatory training WPA and EDI, Behaviour Framework, reporting mechanisms, WBC Code of Conduct	Ensure leadership accountability, reinforce non-retaliation as stated in Dignity at Work Policy.	HR & Senior Management	Immediate	
<b>Job insecurity and vulnerable employees, volunteers and casual contracts</b>	Young employees/workers, migrant and/or English second language backgrounds, workers on short term/casual contracts	Agency staff, volunteers and casual staff complete WPA and EDI training. Vulnerable or less experienced staff are aware of reporting process, are aware of Behaviour Framework.	Managers review training records, regular 121/Check ins, Exit Interviews	Line managers, recruiting managers and HR	Ongoing	
<b>Lack of diversity in leadership</b>	Staff underrepresented at senior levels	EDI training, diversity data collection	Strengthen diverse recruitment approaches	HR	Ongoing	
<b>Workforce demographics (e.g., male-dominated teams)</b>	Staff facing increased risk of harassment	Mandatory EDI and WPA training completed, Officer Code of Conduct, Behaviour Framework, complaint procedures	Encourage inclusive culture through mentoring and leadership training.	Senior Management	Ongoing	

<b>Customer/Service Users dominated by a particular gender.</b>	Higher number of female service users	Completion of mandatory EDI and WPA training. Policies set out reporting channels and expected behaviour. Review of service user risk assessment  Client of Concern reporting  Customer Charter	Managers review training records to ensure training completed.  Case Supervision – review of service user behaviours.  Are customers informed of Customer Charter and expected behaviours?	Managers and Senior Management		
<b>Use of status to assert authority over others to submit to sexual harassment</b>	Recruitment and promotion decisions	Recruitment policy and process – two recruiting managers make decisions.  Completion of mandatory WPA and EDI training	Review of exit interviews	Recruiting managers and HR		
<b>Access to employee networks or Forum representatives</b>	All employees and those working in the community, service/customer focused, part time employees, night shift employees	Networks have Teams Chat available outside of meetings, access to Employee Assistance Programme.	Review rotas to allow attendance to networks, Forum representatives review how they meet with all employees.	Line Managers, HR, SLT		
<b>Training, Reporting and Monitoring</b>	<b>Who might be harmed &amp; how?</b>	<b>What are you already doing to lower risks?</b>	<b>Any further action needed?</b>	<b>Action by Whom?</b>	<b>Action by when?</b>	<b>Date complete</b>

<b>Responsibility for ensuring all employees, volunteers, workers complete their mandatory training if it is flagged as overdue</b>	Employees, volunteers, agency and casual workers	Completion of mandatory training		Line Mangers		
<b>Bystander inaction</b>	Witnesses failing to intervene or report harassment	Completion of mandatory Training		Line Manager		
<b>Awareness of reporting process</b>	Employees, volunteers, casual workers	Completion of mandatory training, Induction process, awareness raising in team communications		Line Manager		
<b>Failure to enforce Dignity in Employment Policy and Grievance Policy</b>	Staff losing confidence in reporting mechanisms	Existing policies and reporting tools	Review of exit interviews, review of sexual harassment complaints for trends/hotspots	Line Managers, HR & Legal	Ongoing	
<b>Ineffective response to allegations and concerns</b>	Staff losing confidence in reporting mechanisms and organisation.	Complaint and Grievance procedures in place	Review any allegations reported, was an investigation held? Was there any evidence to consider? Was the complainant/witness supported appropriately	Line Managers, HR & Legal	Ongoing	

			during investigation? Were there any action points and were the actions completed?			
<b>Retaliation against complainants</b>	Fear of backlash discouraging reports	Completion of mandatory training, monitoring by line manager and HR		Line Manager and HR	Immediate	

<b>Risk assessment completed by</b>		<b>Signature</b>	
<b>Risk assessment sponsored by</b>		<b>Signature</b>	
<b>Date assessment completed</b>			
<b>Risk assessment communicated to relevant staff by</b>	<b>Briefing</b> <input type="checkbox"/> <b>Email</b> <input type="checkbox"/> <b>Copy &amp; Signature</b> <input type="checkbox"/> <b>Other</b> <input type="checkbox"/> please state:		

<b>Review Date</b>	<b>Assessor</b>	<b>Signature</b>	<b>Sponsor</b>	<b>Signature</b>

**Notes and actions for managers:**

- Managers should review this risk assessment as it may apply to their teams.

- Managers should add or amend any relevant issues that are either not covered or require additional detail or specific risks and controls.
- This assessment should be reviewed after any associated incident, any significant change or at least every 2 years.
- The key findings of this risk assessment should be shared with staff in the most appropriate way e.g. shared via email with read receipts, discussed in team meetings, any updates or changes discussed, and knowledge shared where appropriate.
- Consider if training maybe required for any of issues identified above.
- Consider if any procedures or processes need to be reviewed, amended or developed in association with the above.
- As part of an implementation review, managers may be asked to set out how they have reviewed this risk assessment and communicated key issues within their teams.