

# Integrated impact assessment (IIA) Template

Complete as a record of your assessment.

Read the IIA guidance before completing this template.

<b>Title of proposal</b>
Whistleblowing Policy and Toolkit – Legislative changes- including sexual harassment as a protected disclosure
<b>Purpose of proposed work</b>
To consider the impact of including sexual harassment as a protected disclosure.
<b>Lead officer, name, job title, service and department</b>
Abigail Drummond, Senior Solicitor, Legal Services (Facilitator)
<b>Additional colleagues: name, job title, service and department</b>
Emma Kilpatrick, Lead HR Consultant Alana Baillie, Senior HR Consultant Richard Thrall, Governance Officer
<b>Date</b>
20 April 2026
<b>Briefly describe public involvement in this proposal to date and planned</b>
As the proposals will not affect members of the public (internal policy and toolkit only), public involvement is not required. However, engagement has taken place with Trade Union colleagues.

## Impacts

### 1 Equality impacts

We want to ensure our proposals are fair for everyone. Consider potential positive and negative impacts of your proposal on groups/people with [protected characteristics](#). Assessment of impact means we consider the needs of everyone with an “intersectional lens.” This means looking at the impact that different protected characteristics and other factors can have on people.

Consider if your proposal will help:

- prevent discrimination
- advance equal opportunities by reducing disadvantage and meeting different needs, and
- foster good relations by encouraging inclusion and understanding.

**Consider if your proposal could impact on groups/people with protected characteristics. Tick all that apply**

	Negative impact	Positive impact	No impact
1. Age		X	
2. Disability		X	
3. Gender reassignment		X	
4. Marriage and civil partnership		X	
5. Pregnancy and maternity		X	
6. Race		X	
7. Religion or belief		X	
8. Sex		X	
9. Sexual orientation		X	
10. Care experienced children and young people		x	

**Use the text box below to describe the differential impacts you have identified on each of the groups/people with protected characteristics. Consider any intersectional impacts.**

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  $\frac{1}{5}$  of the population.

Anyone with a protected characteristic that is isolated from a family/friends support network may find it hard to report or find support. Those with a protected characteristic may experience sexual harassment in different way and it may look and feel different to those groups. Therefore, this change will impact a large percentage of our organisation in some way through providing an alternative route to disclose that sexual harassment has taken place.

Crucially, through the Whistleblowing route, colleagues can raise concerns on an anonymous or partially anonymous basis. This may encourage people to speak up in the first place (albeit anonymity can make investigation and the ability to support the colleague making the report difficult).

Older colleagues (Age) - 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. Therefore, this addition to the WB Policy will have a positive impact on them and provide a safe place to report.

Younger colleagues (Age)- 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. Therefore, this addition to the WB Policy will have a positive impact on them and provide a safe place to report.

Women (Sex) - Statistics show that more women will experience sexual harassment and therefore we want to recognise that 70% of their Council is women. Some women may be reluctant to report if their senior management team are all male. Therefore, this addition to the WB Policy will have a positive impact on them and provide women with a safe place to report.

Religion and Belief - different religions might view certain behaviours and why you may not want to report. For examples a young women of a certain religion may not want to report sexual harassment as she may then been seen as impure in her community. Therefore, this addition to the WB Policy will have a positive impact on them and provide a safe place to report.

Sexual Orientation - sexual harassment happens regardless of the persons sexual orientation. Therefore, this addition to the WB Policy will have a positive impact on them and provide a safe place to report.

## Evidence

**Use the text box below to summarise what evidence you have used to inform this IIA. Where possible, include links if the documents are published. Show how you have used your evidence in making your assessment of potential impacts.**

**Example:** A proposal to increase charges will impact women more than men as we know women are more likely to be vulnerable to poverty. The [Gendered Nature of Poverty briefing note](#) provides an overview of this issue and why it matters.

**Evidence could include the results of any relevant consultation/engagement. If further evidence is required, please note how it will be gathered.**

Council demographics as of April 2024:

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%

Nearly  $\frac{3}{4}$  of the UK population have experienced at least one form of sexual harassment in their lifetime.

Of those, 18% experience it daily.

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.

Women are also more likely to have been harassed by someone more senior than them – 31% compared to 26% of men).

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.

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.

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.

Racially minoritised women's experiences of sexual harassment is often linked to racism and they are often dealt with separately.

The Health & Safety portal should be recording all incidents of sexual harassment within the organisation; however, it has been highlighted that the sub-category field (to determine nature of prejudice-based incident) is not mandatory, therefore incidents may have been recorded but it is difficult to identify them.

**Please record any mitigating actions for any negative impacts identified, at Section 9 of this template**

## 2 Human Rights impacts

The Council must act compatibly with Human Rights legislation. Think about what kind of impact the proposal may have on people in terms of [Human Rights](#). Use the

text box below to describe which Human Rights Articles are relevant, which groups are affected and what the potential impacts are.

The only article that might be engaged is Article 3: Freedom from torture and inhuman or degrading treatment.

The inclusion of sexual harassment as a protected disclosure will strengthen the Council's support for this important Human Right.

## Evidence

**Use the text box below to summarise what evidence you have used to inform this IIA. Where possible, include links if the documents are published. Show how you have used your evidence in making your assessment of potential impacts.**

**Evidence could include the results of any relevant consultation/engagement. If further evidence is required, please note how it will be gathered.**

Definition of harassment includes degrading treatment:

Section 26 of the Equality Act 2010

(1) A person (A) harasses another (B) if—

(a) A engages in unwanted conduct related to a relevant protected characteristic, and

(b) the conduct has the purpose or effect of—

(i) violating B's dignity, or

(ii) creating an intimidating, hostile, degrading, humiliating or offensive environment for B.

(2) A also harasses B if—

(a) A engages in unwanted conduct of a sexual nature, and

(b) the conduct has the purpose or effect referred to in subsection (1)(b).

(3) A also harasses B if—

(a) A or another person engages in unwanted conduct of a sexual nature or that is related to gender reassignment or sex,

(b) the conduct has the purpose or effect referred to in subsection (1)(b), and

(c) because of B's rejection of or submission to the conduct, A treats B less favourably than A would treat B if B had not rejected or submitted to the conduct.

**Please record any mitigating actions for any negative impacts identified, at Section 9 of this template**

## 3 Children's Rights impacts

The Council must act compatibly with Children's Rights legislation. Think about what kind of impact the proposal may have on children and young people in terms of [Children's Rights](#). Use the text box below to describe which Children's Rights Articles are relevant, which groups are affected and what the potential impacts are.

There is unlikely to be any direct impact, as children and young people will not have access to the Whistleblowing Policy.

However, it may have an indirect impact and could possibly protect children and young people from witnessing sexual harassment or being looked after/ cared for/ taught by perpetrators of sexual harassment.

### **Evidence**

**Use the text box below to summarise what evidence you have used to inform this IIA. Where possible, include links if the documents are published. Show how you have used your evidence in making your assessment of potential impacts.**

**Evidence could include the results of any relevant consultation/engagement. If further evidence is required, please note how it will be gathered.**

The Council operates Children's Services through social work and manages the Schools Estate. Children are the recipients of many services that the Council provides.

As such, it is important that colleagues involved in their teaching and care are clear that sexual harassment will not be tolerated and is a reportable protected disclosure.

This change to the WB Policy will provide an alternative route to report such concerns and will, hopefully, reduce sexual harassment in the workplace. This is particularly important in workplaces where colleagues work with children and young people.

**Please record any mitigating actions for any negative impacts identified, at Section 9 of this template**

## **4 Socio-economic disadvantage impacts**

The Council has a duty to consider how it can reduce inequalities of outcome caused by [socio-economic disadvantage](#), when making strategic decisions. However, to support the Council's Business Plan priorities, the Council considers it best practice to consider the potential impact that all relevant proposals may have on people experiencing socio- economic disadvantage and how inequalities of outcome can be reduced.

**Consider if your proposal could impact on any of the below groups? Tick all that apply.**

	Negative impact	Positive impact	No impact
<b>Low income</b> – cannot afford to maintain regular payments such as bills, food, clothing	X	X	
<b>Low/no wealth</b> – enough money to meet basic living costs and pay bills but have no savings to deal with unexpected spends and no provision for the future	X	X	
<b>Material deprivation</b> – being unable to access basic goods and services, ie home contents insurance, repair/replace broken electrical goods, warm winter coat	X	X	
<b>Area deprivation</b> (including communities of interest and communities of place) – where you live, where you work, visit or spend a continuous amount of time can all have an impact ie rural areas, accessibility of transport, education and employment impact, people who have experienced homelessness and/or the asylum system, those who share an identity and/or protected characteristic	X	X	
<b>Socio-economic background</b> – disadvantage that can arise from parents' education, employment and income, social class in other words.	X	X	

**Use the text box below to describe the impacts you have identified on each of the groups above, and how you can reduce inequalities of outcome?**

Positive

Improved absenteeism – encouraging colleagues to remain in the workplace and support them. Retention within the workplace and becomes attractive place to work, employer of choice.

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.

Employees who are suspended are on full pay.

If someone wasn't brought up to understand their rights, having it clearly articulated that sexual harassment is a protected characteristic may provide a greater understanding that it is something that should be reported.

Negative

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.

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

## **Evidence**

**Use the text box below to summarise what evidence you have used to inform this IIA. Where possible, include links if the documents are published. Show how you have used your evidence in making your assessment of potential impacts.**

**Evidence could include the results of any relevant consultation/engagement. If further evidence is required, please note how it will be gathered.**

LGE Sick Pay entitlement. Taken from Orb:

- Less than 26 weeks' service- 0 contractual sick pay
- More than 26 weeks but less than 1 years' service- 5 weeks full pay, 5 weeks half pay
- More than 1 year but less than 2 years' service- 9 weeks full pay, 9 weeks half pay
- More than 2 years' but less than 3 years' service- 18 weeks full pay, 18 weeks half pay
- More than 3 years but less than 5 years' service- 22 weeks full pay, 22 weeks half pay
- 5 years' service or more – 26 weeks full pay, 26 weeks half pay

Teachers: Taken from SNCT Handbook, Part 2, section 6

- Less than 18 weeks' service- 0 contractual sick pay
- More than 18 weeks but less than 1 years' service- 31 days full pay, 31 days half pay
- More than 1 year but less than 2 years' service- 61 days full pay, 61 days half pay
- More than 2 years' but less than 3 years' service- 122 days full pay, 122 days half pay
- More than 3 years but less than 5 years' service- 152 days full pay, 152 days half pay
- 5 years' service or more – 183 days full pay, 182 days half pay

**Please record any mitigating actions for any negative impacts identified, at Section 9 of this template.**

## 5 Climate and nature impacts

The Council has a [duty](#) to reduce greenhouse gas emissions, adapt to the impacts of climate change, incorporate the principles of sustainability into decisions and actions, and ensure a just transition (just transition only applies to climate mitigation or adaption projects).

**Consider if your proposal could impact on any of the below? Tick all that apply.**

	Negative impact	Positive impact	No impact
<b>Climate Mitigation</b> - opportunities to reduce greenhouse gas emissions			X
<b>Climate Adaptation</b> - opportunities to prepare for future changes in our climate			X
<b>Just Transition</b> – opportunities to ensure a fair shift to a low carbon economy that doesn't disadvantage people or increase inequality			X
<b>Nature Recovery Impacts</b>			X
<b>Overall Sustainability</b>			X

**Use the text box below to describe the impacts you have identified on each of the sections above and then consider how you can reduce greenhouse gas emissions, adapt to the impacts of climate change, incorporate the principles of sustainability into decisions and actions, and ensure a just transition. Also consider any cumulative effects of climate change on people.**

No impact

**Use the text box below to describe the impacts you have identified on nature.**

No impact

### Evidence

**Use the text box below to summarise what evidence you have used to inform this IIA. Where possible, include links if the documents are published. Show how you have used your evidence in making your assessment of potential impacts.**

**Evidence could include the results of any relevant consultation/engagement. If further evidence is required, please note how it will be gathered.**

No impact

Please record any mitigating actions for any negative impacts identified, at Section 9 of this template

## 6 Strategic Environment Assessment (SEA)

Could your proposal result in significant environmental effects? If yes, you may need to complete a Strategic Environment Assessment? Information is available on the [Scottish Government SEA website](#).

	No
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## 7 Consumer Duty

The Council has a duty to consider consumers' interests when making strategic decisions. If this applies to your proposal, you may need to complete a [consumer duty impact assessment](#). Information is available on the [Consumer Scotland website](#).

	No
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## 8 Communications

Record how you will communicate information about this proposal change to those with different communication needs using [inclusive communications guidance and resources](#).

We will work with Communications to ensure this change to the policy is communicated through the Orb, Managers News and Newsbeat.
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## 9 Contractors

Is any part of this proposal to be carried out wholly or partly by contractors and if so, how will equality, human rights, children's rights and climate and nature issues be addressed?

Safecall is our external whistleblowing hotline provider. Safecall operate to an agreed standard and in line with respect for equality, human rights, children's rights and climate and nature issues.
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## 10 Actions

Record your actions in the table below. Actions may include:

- mitigations to reduce or eliminate negative impacts
- advancing equality of opportunity and fostering good relations
- addressing cumulative impacts
- collecting additional evidence

- financial implications
- risks
- any other actions.

<b>Actions</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date (add name and job title)</b>
Advancing equality of opportunity by communicating the change	Communications (Simone Duffy, Senior Communications Officer)	31 August 2026	31 August 26 (Abigail Drummond, Senior Solicitor)

## 11 Monitoring impact

Monitoring ensures that your proposal is effective and any issues are addressed.

Record your actions in the table below. Actions may include:

- how impacts on protected characteristics will be monitored, once the proposal has been introduced and implemented
- how IIA agreed actions will be monitored
- review process and timescales
- officer responsible.

<b>Actions to monitor impact of proposal</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date (add name and job title)</b>
WB Policy reviewed annually	Governance/ Legal (Nick Smith, Monitoring Officer)	August 2027	August 2027
GRBV Oversight – trend analysis, yearly in the Annual Whistleblowing Report to GRBV and quarterly in the Monitoring Officer’s Report if any sudden trends	Governance Team (Nick Smith, Monitoring Officer)	Repeats Quarterly/ Annually	Repeats Quarterly/ Annually

## 12 Next steps

Elected members must have access to IIAs in order to scrutinise them before making decisions. You must:

- share the IIA with them (this can be at draft stage for an APM meeting)
- complete the [committee report](#) with:
  - a summary of the identified impacts at section 7 of the committee report template: key policies
  - actions to address them at section 5 of the committee report template: next steps
- provide a link to the published IIA or attach as an appendix.

## 13 Quality assurance and approval

Complete the quality assurance checklist.

Send the quality assurance checklist and your completed IIA to your Head of Service for approval.

## 14 Authorisation

<b>Name and title</b>
Nick Smith, Service Director Legal and Assurance and Monitoring Officer
<b>Date</b>
04.05.2026

## 15 Publication

Send the approved IIA template to the relevant contact for publication. Ensure the title of the IIA is clear and concise, without acronyms and the content, layout and language style is [inclusive and accessible](#).

The City of Edinburgh Council:

- [integratedimpactassessments@edinburgh.gov.uk](mailto:integratedimpactassessments@edinburgh.gov.uk) to be published on the [Council website](#)

Edinburgh Integration Joint Board/Health and Social Care:

- [sarah.bryson@edinburgh.gov.uk](mailto:sarah.bryson@edinburgh.gov.uk) to be published on the [EH&SCP website](#)

Keep a copy of your template for a period of at least three years (longer if needed for business reasons).