

Equality and Fairness Impact Assessment (EFIA) Form



If the 'policy or practice' (see definition below) you are developing or going to develop is assessed as relevant after undertaking the online screening process (the [Impact and Value Assessment \(IVA\)](#)) - that is, it will have either a positive or negative impact on people - you should complete an Equality and Fairness Impact Assessment (EFIA) using this form.

This form should only be completed if you have undertaken an [Impact and Value Assessment \(IVA\)](#) to screen whether a full Equality and Fairness Impact Assessment is required.

Complete this for all relevant policies or practices:

- 'relevant' means it will have an impact on people
- 'policy or practice' - see definition below

Definition of policy or practice for the purposes of EFIA:

- The term 'policy or practice' covers Service delivery and Employment. This can include a policy, a plan, a strategy, a project, a service review, a function, practice or service activity or a budget option.

Section 1: Policy details (see definition of 'policy or practice' above)

Name of policy or practice

Sexual Harassment Policy

Service and Division/Team

People and Culture

Owner/Person responsible (include your name and position)

Sandra Lawson, Team Leader Employment Equalities and Policy

Impact Assessment Team (include your names and positions). This team can consist of two people or more as appropriate.

Sandra Lawson, Gill Davey

Is the policy or practice being impact assessed new or existing?

New

What are the main aims of the policy or practice?

This policy, along with associated guidance, aims to:

1. explain what Sexual Harassment means
2. clarify what an individual should do if they experience or witness Sexual Harassment
3. clarify what a manager should do if they receive a complaint of Sexual Harassment
4. outline processes for dealing with complaints about a Third Party
5. provide direction and support for anyone affected by Sexual Harassment
6. assessing and avoiding risk of sexual harassment

Who are the main target groups/beneficiaries?

Employees, Elected Members

What are the intended outcomes of the policy or practice?

The Council is committed to providing an inclusive, supportive and safe working environment, free from sexual harassment. Sexual Harassment of any kind is unacceptable and will **not be tolerated**. The Council will take **all reasonable steps** to prevent sexual harassment of our employees, in the course of their employment, by **fellow employees** or by **third parties**. Responsibility lies with the Council, Managers, Employees and Trade Unions with the regards to the values and behaviours expected and all parties should ensure they are familiar with:

- the content of this policy
- associated [Harassment, Bullying and Victimisation Guidance](#) which clarifies how each of us is responsible for the prevention of Sexual Harassment and any other form of harassment, bullying or victimisation

and that they complete the Councils mandatory Sexual Harassment eLearning.

Section 2: Detail the positive and/or negative impacts, or tick to indicate no impact identified

Key questions to address in the EFIA

- Does the policy or practice evidence that it has eliminated discrimination?
- Does the policy or practice evidence that it has advanced equality of opportunity?
- Does the policy or practice evidence that it will foster good relations between groups?

The Assessment should highlight areas of interest covering the following:

- positive and negative impacts across all protected characteristics
- scale of the impact: an indication of the degree of potential impact, and whether this is judged to have a High, Medium or Low impact potential
- anticipated duration of the impact if relevant
- whether there is a specific differential impact to a particular protected characteristic or characteristics
- if the impact is more wide-ranging and general in its effect
- whether any impacts identified would/could be mitigated by an amendment to the policy, practice budget decision or service reform proposal

Equality protected characteristic: Age

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
Older people (65 years and over)			✓

Equality protected characteristic: Disability

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
Physical disability			✓
Sensory impairment			✓

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
Mental health			✓
Learning disability			✓
Neurodivergent conditions			✓

Equality protected characteristic: Gender reassignment

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
Male transitioning to female			✓
Female transitioning to Male			✓

Equality protected characteristic: Marriage/Civil partnership

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
Women			✓
Men			✓
Same-sex couple (male)			✓
Same-sex couple (female)			✓

Equality protected characteristic: Pregnancy/Maternity/Paternity

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
Women			✓
Men (paternity)			✓

Equality protected characteristic: Race

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
View the list of categories used in Scotland's Census			✓

Equality protected characteristic: Religion/Belief

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
View the list of categories used in Scotland's Census			✓

Equality protected characteristic: Sex

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
Female	Sexual Harassment disproportionately affects women, and the policy strengthens prevention reporting, support and		

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
	organisational accountability.		
Male	Makes clear that anyone can experience sexual harassment and provides equal access to reporting support and a fair process.		

Equality protected characteristic: Sexual orientation

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
Lesbian			✓
Gay			✓
Bisexual			✓
Other sexual orientation			✓

Equality protected characteristic: Socio-economic (fairness)

Please refer to Appendix 2 of accompanying guidance

Specific characteristics	Positive impact (it could benefit the group concerned)	Negative impact (it could disadvantage the group concerned) and any mitigation	No impact
			✓

For any policies or practice specific to young people under the age of 16 years, a separate Children's Rights and Wellbeing Impact Assessment should be undertaken – view the [National Guidance](#).

Section 3: Recommendations and actions

As a result of this equality impact assessment, please **clearly describe practical actions** you plan to take to:

- reduce or remove any identified **negative impact**
- promote any **positive impact** or
- **gather** further information/evidence

Equality protected characteristic: Age

Specific characteristics	Action	Who is responsible	Date for completion
Older people (65 years and over)			

Equality protected characteristic: Disability

Specific characteristics	Action	Who is responsible	Date for completion
Physical disability			
Sensory impairment			
Mental health			
Learning disability			
Neurodivergent conditions			

Equality protected characteristic: Gender reassignment

Specific characteristics	Action	Who is responsible	Date for completion
Male transitioning to female			
Female transitioning to male			

Equality protected characteristic: Marriage/Civil partnership

Specific characteristics	Action	Who is responsible	Date for completion
Women			
Men			
Same-sex couple (male)			
Same-sex couple (female)			

Equality protected characteristic: Pregnancy/Maternity/Paternity

Specific characteristics	Action	Who is responsible	Date for completion
Women			
Men (paternity)			

Equality protected characteristic: Race

Specific characteristics	Action	Who is responsible	Date for completion
View the list of categories used in Scotland's Census			

Equality protected characteristic: Religion/Belief

Specific characteristics	Action	Who is responsible	Date for completion
View the list of categories used in Scotland's Census			

Equality protected characteristic: Sex

Specific characteristics	Action	Who is responsible	Date for completion
Female	Issue a series of communications to promote clear reporting routes, protection from detriment, manager training, support and monitoring to address the impact of sexual harassment.	People and Culture, policy owner. All managers All Employees	October 2026
Male	Ensure communications make clear that anyone can experience sexual harassment and that support and reporting routes are open to all.	People and Culture, policy owner. All managers All Employees	October 2026

Equality protected characteristic: Sexual orientation

Specific characteristics	Action	Who is responsible	Date for completion
Lesbian			
Gay			
Bisexual			
Other sexual orientation			

Equality protected characteristic: Socio-economic (fairness)

Please refer to Appendix 2 of accompanying guidance

Specific characteristics	Action	Who is responsible	Date for completion

Section 4: Evidence

You should list here the sources of information used to assess the impact of the relevant policy or practice. This can include local sources such as reports, information and data, relevant partners' information, data and reports, other Council's relevant information, data and reports, national information, research outcomes, data profiles and any other evidence which has led to the development of this policy.

Information/evidence gained and used to shape this policy or practice	List details, source and date (continue on a separate sheet if necessary – please advise if this has been done)
Community consultation/engagement outcomes from individuals and organisations - this usually includes formally arranged contact with individuals, community groups, third sector and other relevant interest groups	
Employee involvement/consultation feedback (for example survey, focus groups)	Engagement with Trade Unions for input to draft policy and associated guidance. (June 2026) Feedback requested from internal staff networks where available. (June 2026)
Research and information list main sources	Equality Act 2010; Public Sector Equality Duty; Worker Protection (amendment) legislation introducing preventative duty on sexual harassment; EHRC and ACAS guidance on sexual harassment; PKC Fairness at Work Policy / Grievance Procedure for Teachers; PKC Whistleblowing Policy; Health and Safety risk assessment guidance; Equally Safe At Work Framework.
Officer knowledge and experience	Professional knowledge and experience from various officers within People and Culture
Equality monitoring data	Equality monitoring data for PKC for recent years was used to identify traits within our workforce eg. Ratio of female to male 73:27 in favour of females.
Service user feedback (including customer contact, services and complaints)	
Partner feedback	

Information/evidence gained and used to shape this policy or practice	List details, source and date (continue on a separate sheet if necessary – please advise if this has been done)
Other - this may be information gathered in another Council area, nationally or in partner organisations which is considered to have relevance	Benchmarking with other Local Councils regarding best practice policy and guidance.

Section 5: Consultation/Engagement

Consultation with key stakeholders must be undertaken throughout the EFIA process. This activity **can also** help to **reach people not previously involved** with these processes, but who will be affected by this policy or practice when it is implemented. You may wish to refer to the [Council's Consultation Guidance](#).

The Consultation/Engagement process can also help **identify or agree changes** that need to be made to ensure the policy or practice will be inclusive on implementation and future practice.

The Equalities Team Leader (email Equalities@pkc.gov.uk) may be able to provide advice relating to potential contact with consultees from equality protected characteristic groups via existing mechanisms such as the Community Equalities Advisory Group (CEAG) or Equalities Strategic Forum.

A summary of the replies received from individuals and stakeholders consulted/involved. Include any previous feedback or complaints relating to equality and diversity issues and the policy or practice currently being assessed.

Continue on a separate sheet(s) if necessary – please advise if this has been done.

Equality protected characteristic: Age

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
Older people (65 years and over)		

Equality protected characteristic: Disability

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
Physical disability		
Sensory impairment		
Mental health		
Learning disability		
Neurodivergent conditions		

Equality protected characteristic: Gender reassignment

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
Male transitioning to female		
Female transitioning to male		

Equality protected characteristic: Marriage/Civil partnership

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
Women		
Men		
Same-sex couple (male)		
Same-sex couple (female)		

Equality protected characteristic: Pregnancy/Maternity/Paternity

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
Women		
Men (paternity)		

Equality protected characteristic: Race

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
View the list of categories used in Scotland's Census		

Equality protected characteristic: Religion/Belief

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
View the list of categories used in Scotland's Census		

Equality protected characteristic: Sex

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
Female	June 2026	Feedback will be used to inform development of policy.
Male	June 2026	Feedback will be used to inform development of policy.

Equality protected characteristic: Sexual orientation

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
Lesbian		
Gay		
Bisexual		
Other sexual orientation		

Equality protected characteristic: Socio-economic (fairness)

Please refer to Appendix 2 of accompanying guidance

Specific characteristics	Date	Outcome of consultation/engagement (continue on a separate sheet if necessary – please advise if this has been done)
Socio-economic (fairness)		

Section 6: Outcomes

When the evidence has been considered in relation to the proposed policy, practice, project, service reform or budget option, it will be apparent what the likely impacts are. The type, scale, duration, and specificity of the likely impacts will inform the direction of the outcome of the EFIA.

There are four potential outcomes as follows (**highlight the one you are recommending as a result of your Impact Assessment**):

1. No major change required the policy, practice, project, service reform or budget option is robust and can continue without amendment.
2. Continue the policy, practice, project, service reform or budget option. A justification is required for continuing despite the potential for adverse impact.
3. Adjust or amend the policy, practice, project, service reform or budget option. Remove barriers, make changes to better advance equality or remove or mitigate negative impact.
4. Stop, or remove the policy, practice project, service reform or budget option if adverse effects cannot be justified and cannot be mitigated.

Section 7: Authorising the assessment

The following signatures are required:

Lead Officer Responsible

Signed *Sandra Lawson*

Name Sandra Lawson

Date 18 June 2026

Quality Assured by Perth and Kinross Council Equality and Fairness Impact Assessment trained officer (within service)

Signed David F. McPhee (via email)

Name D.F.McPhee

Date 19 June 2026

Section 8: Publishing the assessment

The completed and authorised EFIA should be added to the relevant section on the [Council website](#).

Date action completed: 2 July 2026

Section 9: Committee reporting

Ensure your committee report to accompany this policy includes information about any actions taken to reduce or remove negative impacts identified, or include any positive impacts expected when the policy is implemented.