

Diversity Impact Assessment

TITLE
Sexual Harassment Policy
DATE
17/11/2025
LEAD OFFICER.
Harry Steer, ER Consultant & Policy Lead
1 Summary description of the proposed change
What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?
<p>The Worker Protection Act 2023 is a substantial update to the protections of workers against sexual harassment. It requires employers to take “reasonable steps” to prevent sexual harassment in the workplace. Further to this, the Employment Rights Bill proposes to further upgrade this to “all reasonable steps”.</p> <p>The Equality and Human Rights Commission has set out a 8-step guide for employers that includes having a zero-tolerance policy against sexual harassment, sexual harassment training, sexual harassment risk assessments, and protective measures against third-party sexual harassment.</p> <p>Our current Harassment policy and procedure do not sufficiently meet these legal requirements. This proposed policy ensures we are legally compliant, while also putting us ahead of the further changes under the Employment Rights Bill, by clearly laying out responsibilities at an employee, managerial and HR level to prevent and respond to complaints of sexual harassment.</p> <p>It provides an explanation of what sexual harassment is, who can be involved, and provides clear examples of preventative and responsive measures. This will improve clarity around sexual harassment for all people in the Council and support diversity and equality by supporting a safe and welcoming workplace.</p>
2 Summary of evidence used to support this assessment
<p>E.g. Feedback from consultation, performance information, service user.</p> <p>E.g. Comparison of service user profile with Medway Community Profile</p>
<p>This policy was benchmarked against other local authority Sexual Harassment policies. It was also benchmarked against the Equality and Human Rights Commission’s guidance, the ACAS Code and guidance, and guidance and information from UK law firms. It is based on best practice gathered since the introduction of the Act, including limited case law since its introduction.</p> <p>In addition, the Employment Relations Team, interest groups, forums and trade unions were consulted and helped shape the policy via feedback gathered and implemented.</p>

3 What is the likely impact of the proposed change?

Is it likely to:

Adversely impact on one or more of the protected characteristic groups

Advance equality of opportunity for one or more of the protected characteristic groups

Foster good relations between people who share a protected characteristic and those who don't

(insert Yes when there is an impact or No when there isn't)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	No	No	No
Disability	No	No	No
Gender reassignment	No	No	Yes
Marriage/civil partnership	No	No	No
Pregnancy/maternity	No	No	Yes
Race	No	No	No
Religion/belief	No	No	No
Sex	No	Yes	Yes
Sexual orientation	No	No	Yes
Care experience	No	No	No
Other (e.g. low income groups)	No	No	No

4 Summary of the likely impacts

Who will be affected?

How will they be affected?

The primary impacts will be on those employees affected by issues of sex, gender reassignment and sexual orientation due to the nature of the impacts of sexual harassment in the workplace. It may also help foster good relations with pregnancy/maternity, who can also be at a greater likelihood of experiencing sexual harassment.

The impacts of the introduction of this policy will be positive for these groups, offering them better protections, more clarity around their rights, and fostering a zero-tolerance culture when it comes to sexual harassment.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

What alternative ways can the Council provide the service?

Are there alternative providers?

Can demand for services be managed differently?

N/A

6 Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date

7 Recommendation

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

Recommendation: Agree to the adoption of the Sexual Harassment Policy

8 Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Sam Beck-Farley, Chief Organisational Culture Officer

Date of authorisation

17/11/2025