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<b>Policy Name</b>	<b>Dignity at Work</b>
<b>Policy Author</b>	<b>Director / EVH Model Policy</b>
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West Whitlawburn Housing Co-operative will provide this policy on request at no cost, in larger print, in Braille, in audio or other non-written format, and in a variety of languages. Please contact the office.

**Registered with the Scottish Housing Regulator No. 203**  
**Registered Charity No. SCO38737, VAT Registration No. 180223636**  
**Registered society under the Co-operative and Community Benefit Societies Act 2014**



## **1. Introduction**

West Whitlawburn Housing Co-operative (WWHC) is committed to providing a working environment and culture where all employees have the right to be treated with dignity and respect, free from bullying, harassment, sexual harassment, discrimination and victimisation of any nature. Every employee, governing body member, agency worker, contractor, and consultant of WWHC has a responsibility to treat all anyone who is associated with the work of WWHC with dignity and respect, regardless of any personal characteristic.

Under legislation there are certain characteristics protected from the area of harassment, WWHC will acknowledge these and also extend this protection to all within WWHC.

## **2. Background**

The definitions concerning some of the terminology used within the scope of dignity at work have changed over the years. Most recently the Equality Act 2010 provided a legal definition of harassment but there is still no current legal definition of bullying. However, ACAS provides a definition which is widely recognised as being best practice.

## **3. Legal Framework**

There are a number of legal principles contained in the following legal documents that will apply as follows:

- The Equality Act 2010 - Protects the rights of individuals and advances equality of opportunity for all.
- Worker Protection Act 2023 - An amendment of the Equality Act 2010 aims to better protect employees from sexual harassment, prioritising prevention.
- Public Interest Disclosure Act 1998 - Provides protection to employees who have been victimised at work or they have lost their job due to a disclosure they raised.
- Health & Safety at Work Act 1974 - Sets out the framework for managing workplace health and safety in the UK.
- Breach of contract - usually breach of the implied term that an employer will provide support to employees to ensure that they can carry out their job without harassment and disruption from colleagues
- The common law position to take care of the safety of workers.
- Employment Rights Act 1996 - constructive and unfair dismissal
- Personal Injury protection including the duty to take care of workers arising out of the Law of Delict.

- Trade Union and Labour Relations (consolidation) Act 1992 dealing with specific types of intimidation
- Protection for Whistleblowers under the Public Interest Disclosure Act 1998
- Criminal Justice and Public Order Act 1994

## **Definitions:**

**Protected Characteristics:** The legal grounds in which discrimination claims can be made. These include age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation.

**Harassment:** unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Any Organisation will extend this definition to include all and will not be restricted to those identified as having a protected characteristic.

Harassment can occur where someone perceives another person to have a protected characteristic. Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic.

- Examples of harassment could include but not limited to:
  - "banter", jokes, taunts or insults that are sexist, racist, ageist, transphobic, homophobic or derogatory against any other protected characteristic.
- unwanted physical behaviour, for example, pushing or grabbing.
- excluding someone from a conversation or a social event or marginalising them from the group.
- unwelcome comments about someone's appearance or the way they dress that is or is not related to a protected characteristic.
- revealing someone's sexual orientation against their wishes or threatening to.
- consistently using the wrong names and pronouns following the transition of a person's gender identity.
- displaying images that are offensive.
- excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

**Sexual Harassment:** conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and less favourable treatment related to sex or gender reassignment that occurs because of a

rejection of, or submission to, sexual conduct

Please refer to *Appendix 1 – Sexual Harassment* for specific information relation to sexual harassment.

**Bullying:** Offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient. If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

Examples of bullying could include but not limited to:

- Spreading a false rumour
- Consistently giving heavier workloads to one particular individual in a team
- Unjustly cutting off or preventing someone from reasonably expressing their views in a meeting
- Regularly undermining the authority of any other employees.

**Victimisation:** Treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

**Unacceptable behaviour:** A one-off act, if it is serious, can amount to bullying or harassment. All behaviours will be guided by and in line with WWHC's Code of Conduct.

Examples of unacceptable behaviour could include but not limited to:

- derogatory comments, offensive language, remarks or jokes.
- spreading malicious rumours or insulting someone.
- insulting behaviours or gestures.
- displaying offensive or suggestive literature or remarks.
- intrusion by pestering, spying or stalking.
- embarrassing, threatening, humiliating, patronising or intimidating remarks.
- physical or verbal assault, such as shouting.
- undermining a person's self-esteem, for example by constantly making unfavourable comparisons with others or belittling their status.

Harassment, bullying, victimisation or unacceptable behaviours may be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. These may occur at work or outside work.

It is not the intention of the perpetrator (the person accused of bullying or harassment) that decides whether bullying or harassment has taken place; instead, it depends on whether the behaviour is unacceptable by reasonable normal standards and is harmful or unwelcome to the person or people on the receiving end.

#### **4. Policy Principles**

This Dignity at Work Policy aims to:

- Set out standards of behaviour expected for employees, agency workers and consultants of WWHC.
- Ensure that employees, agency workers and consultants are able to report any unacceptable behaviours, and relevant action is taken to resolve it.
- Promote proactive and preventative measures to support positive and respectful working relationships.
- Ensure integration of diversity into all aspects of WWHC's business
- Ensure that all employees, agency workers and consultants are treated with respect and dignity from each other.
- Set clear guidelines and standards regarding treatment of employees by third parties.
- Ensure that all employees, agency workers and consultants respect the differences within the community they serve and treat customers and members of the public accordingly
- Provide a working environment where all backgrounds, cultures, values and lifestyles are respected and treated with dignity at all times.
- Provide a process for complaints to be properly managed.

#### **5. Implementation of Policy**

The Director is responsible for the implementation and review of this policy.

WWHC will ensure that all new employees, governing body members, agency workers, contractors, and consultants will receive an induction on this policy. The policy will be integrated into all policies and procedures within WWHC. Copies of this policy will be issued to all employees, governing body members, agency workers, contractors, and consultants, and will be available to all who request it.

This policy applies to all employees, governing body members, agency workers, contractors, and consultants of WWHC and therefore all mentioned parties, have a responsibility to abide by the principles outlined above and also to alert their line manager or the Director should any behaviours be witnessed which breach this policy.

Unacceptable behaviour and practices will not be tolerated. However, if or when a situation arises it will be dealt with immediately, as inaction is not an option. Behaviours found to be breaching this policy will be regarded as misconduct and will be dealt with appropriately and in accordance with the relevant policies, including code of conduct and disciplinary. Serious cases may be regarded as gross misconduct and may result in dismissal.

## **6. Roles & Responsibilities**

### **6.1 Organisational**

WWHC are committed to providing a safe and respectful workplace and promoting a working environment based on dignity and trust, and one that is free from discrimination, harassment, bullying or victimisation. We therefore adopt a zero-tolerance approach to instances of bullying or harassment.

We are committed to taking proactive measures to prevent all forms of bullying and harassment, including sexual harassment, of our employees, agency workers and consultants.

### **6.2 Employees, Agency Workers and Consultants**

All employees, agency workers and consultants have a personal responsibility to act in line, observe and uphold this policy and follow WWHC's Code of Conduct. All employees, agency workers and consultants also have the responsibility to participate in any relevant mandatory training course.

#### **Managers**

Anyone responsible for leading, managing or supervising people have additional responsibilities to ensure:

- They understand their own and the organisational responsibilities.
- They are familiar with content of the Dignity at Work Policy and communicate to the relevant people.
- Role model behaviours expected and encourage a positive workplace culture
- Challenge unacceptable or questionable behaviour they become aware of.
- Ensure any breaches or complaints relating to this policy are responded to quickly, sensitively, confidentially and investigated in line with policy.

## **7. Procedure in Dealing with breaches of Dignity & Respect**

This procedure is complemented by WWHC's Equality & Diversity and Disciplinary & Grievance policies.

Where an employee feels that they have been discriminated against, victimised or harassed by another employee, not been treated with dignity & respect at work, there are a number of ways in which this can be addressed.

### **7.1 Informal stage**

Where possible, breaches of this policy should be dealt with informally in the first instance. In many cases inappropriate behaviours are unintentional and can easily be resolved once the behaviour has been highlighted. This is often the most efficient way to maintain positive working relations.

In managing the issue informally, employees should

1. In the first instance alert their line manager to the behaviour
2. Thereafter the employee should be encouraged by the line manager and with their support approach the individual and highlight what behaviour has been offensive. Should the employee be uncomfortable with this then the line manager should approach the individual and have the same discussion.
3. A note should then be put on file of the person who has displayed the inappropriate behaviour and the individual that raised the issue.

### **7.2 Formal Stage**

If the behaviour is of a more serious nature or it continues after the informal approach has been taken then the issue should be dealt with by mirroring WWHC's grievance procedure.

1. The employee must put their concerns in writing and give this to their line manager.
2. The line manager should then arrange a meeting with the employee who has highlighted the concerns. At this meeting the manager should establish what the concerns are, and how the employee would like things resolved.
3. The manager should then conduct any necessary investigations. No investigation should take place prior to there being a meeting with the employee.
4. Once the investigation has been concluded, there could be a variety of outcomes including:
  - There is no evidence to uphold the complaint

- There is evidence that may involve action against another employee which will be managed through WWHC's disciplinary policy.
- Learning is identified on an organisational basis

Where action is taken regarding an employee, governing body member, agency worker and consultant other than the person who raised the complaint, the complainant will not be informed of any action taken against other individuals.

### **7.3 Governing Body Members, Agency Workers, Contractors and Consultants or members of the public**

Where a governing body member, agency worker, contractor, consultant and/or members of the public feel that behaviours towards them have breached the principles of this policy, they have a responsibility to inform the Director of this as soon as reasonably practical. The complaint will be investigated appropriately and dealt with in accordance with the relevant policies and procedures.

### **7.4 Support for those affected or involved**

We understand that anyone affected by, or involved with, a complaint relating to a breach of this policy may feel anxious or upset and we will do what we can to support you.

Additional support is available from:

Self Referral Crisis Counselling: [www.crisiscounselling.co.uk](http://www.crisiscounselling.co.uk).

NHS: <https://www.nhsinform.scot/>

Stress: 0800 389 7851 (24hr helpline)  
0800 435 768 (face-to-face & structured appointments)

ACAS: <https://www.acas.org.uk/sexual-harassment>

## **8. Individuals found to be in breach of the principles of this Policy**

Where individuals are found to be in breach of this policy whether that be employees, governing body members, agency workers, contractors, and/or consultants this will be dealt with in accordance with WWHC's code of conduct and other relevant policies. This may therefore result in termination of the individual's contract, or engagement within WWHC.

## **9. Malicious Allegations**

Any person found to be making fictitious or malicious allegations will be



dealt with through WWHC's disciplinary procedure which may result in dismissal.

## **9. General Data Protection Regulations**

The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Privacy Policy. Information regarding how your data will be used and the basis for processing your data is provided in WWHC's privacy notices.

## **10. Equalities**

We are committed to ensuring equal opportunities and fair treatment for all people in our work. In implementing this Policy, we will provide a fair and equal service to all people, irrespective of factors such as gender, race, disability, age, sexual orientation, language or social origin, or other personal attributes.

## **11. Review of Policy**

This policy will be reviewed every 5 years and if necessary, in line with legislative updates.

The Director is responsible for reviewing and monitoring the application of this policy.

## **Appendix 1 - Sexual Harassment**

### **Introduction**

WWHC is committed to providing a positive experience whilst at work for all our employees, agency worker and consultants which includes a zero-tolerance approach to sexual harassment.

This appendix sets out WWHC's expectations of behaviour by employees, governing body members, agency workers and consultants and provides information on how we will deal with complaints of sexual harassment.

### **Definitions**

The Equality Act 2010 defines sexual harassment as 'conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment'. Sexual Harassment is unlawful under the Equality Act 2010. It is also unlawful to treat someone less favourably because they have submitted a complaint of sexual harassment or have rejected such a behaviour.

Sexual harassment includes a wide range of behaviours including but not limited to:

- Making sexual remarks about a colleague's body, clothing or appearance
- Suggestive looks, staring, or leering.
- Propositions and sexual advances
- Sexual gestures
- Emailing, texting or messaging sexual content.
- Unwelcome touching, hugging, massaging or kissing
- Sexual comments or offensive jokes
- Making sexual comments or jokes about someone's sexual orientation or gender reassignment
- Displaying or sharing sexually graphic images, or other sexual content
- Criminal behaviour, including sexual assault, stalking, grooming, indecent exposure and sending offensive communications

Sexual harassment can be a singular event or something that is an ongoing pattern of behaviour. Sexual harassment may be physical, verbal

or non-verbal conduct. It can occur face to face or can be done by email, phone calls, online and on social media. Sexual harassment may occur at work or outside work.

Sexual conduct that has been welcomed previously can become unwanted, the person in receipt of the behaviour decides whether it is unwanted. An individual can experience sexual harassment from someone of the same or different sex.

Sexual interactions that are invited, mutual and consensual are not considered as sexual harassment.

### **Behaviour expectations**

WWHC expects you to follow the expectations as set out within the Code of Conduct. Any Sexual Harassment by employees towards others in connection with work will be considered under the Disciplinary and Grievance policy and action taken under this policy can include up to and including dismissal. Sexual harassment may constitute gross misconduct and may result in dismissal.

### **Preventative Duties**

The Worker Protection Act (Amendment Equality Act 2010) requires employers to take reasonable steps to prevent sexual harassment. WWHC has taken preventative steps to ensure a workplace free from any sexual harassment. In addition to this policy, a risk assessment has been completed to assess the risks and preventative steps include:

- **Engage with teams** – staff and team meetings, 1:1 meetings.
- **Training & Development** – induction training, H&S safety training, e-learning facilities, equality & diversity training and refresher training.
- **Dealing with complaints** – Line management training on disciplinary and grievance policy, GDPR training, Process, managers awareness, confidentiality and sensitivity.
- **Third party complaints** – training managers, induction training and communication with third-parties.
- **Reporting** – clear and effective reporting procedures, anonymous complaints process, communication of this process, whistleblowing policy and procedures.

- **Monitor and evaluate policy and complaints** – policy review schedules, subscription to EVH and identifying learning outcomes from complaints and actions required.

### **Reporting procedure & dealing with all sexual harassment complaints**

Allegations should always be taken seriously, and action taken as quickly as possible to stop any further inappropriate behaviour identified. Where possible, breaches of this policy should be dealt with informally in the first instance. Dependant on the serious nature of some complaints together with the risk to the safety of the complainant and others, we may need to take formal action immediately.

#### **Informal stage**

In managing the issue informally employees should:

1. In the first instance alert their line manager to the behaviour.
2. Thereafter the employee should be encouraged by the line manager and with their support approach the individual and highlight what behaviour has been offensive. Should the employee be uncomfortable with this then the line manager should approach the individual and have the same discussion.
3. A note should then be put on file of the person who has displayed the inappropriate behaviour and the individual that raised the issue.

#### **Formal Stage**

If the behaviour is of a more serious nature or it continues after the informal approach has been taken, then the issue should be dealt with by mirroring WWHC's grievance procedure.

1. The employee must put their concerns in writing and give this to their line manager.
2. The line manager should then arrange a meeting with the employee who has highlighted the concerns. At this meeting the manager should establish what the concerns are, and how the employee would like things resolved.

3. The manager should then conduct any necessary investigations. No investigation should take place prior to there being a meeting with the employee.
4. Once the investigation has been concluded, there could be a variety of outcomes including:
  - There is no evidence to uphold the complaint
  - There is evidence that may involve action against another employee which will be managed through WWHC's disciplinary policy.
  - Learning is identified on an organisational basis

Where action is required against another employee, governing body member, agency worker or consultant this will follow the organisation's disciplinary procedures. Where action is taken regarding a member of staff other than the person who raised the complaint, the complainant will not be informed of any action taken against other individuals.

### **Anonymous complaint**

We may receive anonymous allegations of sexual harassment through the "Whistle-blowing procedure". While we recognise that it can be difficult to investigate such complaints, WWHC will conduct a thorough investigation as possible, given the information available. This will always include informing the accused person that a complaint has been received about them.

### **Third Party Sexual Harassment**

WWHC will also take reasonable steps to prevent any sexual harassment by third parties, as required by the Worker Protection Act 2023. A third party can be a customer, consultant, contractor, visitor or other members of the public.

Employees, agency workers and consultants are encouraged to report any sexual harassment, which may involve a third party.

WWHC will follow the process as detailed within 'Procedure for dealing with all Sexual harassment complaints' section.

When a complaint is received WWHC will ensure that steps are taken to

protect the individual raising the complaint. WWHC will take steps to remedy a complaint and action to prevent this from happening again.

Examples of action WWHC may take, but not limited to are:

- Warning a customer about their behaviour;
- Restricting contact with a customer;
- Restrict communication (e.g. via a third party);
- Seeking legal measures to protect staff;
- Reporting any criminal acts to the police;
- Sharing information with other parts of the business;

Or otherwise as defined in our [Unacceptable Actions policy](#).

### **Support for those affected or involved**

We understand that anyone affected by, or involved with, a complaint relating to sexual harassment, or a breach of this policy may feel anxious or upset and we will do what we can to support you during this period.

Additional support is available from:

Self Referral Crisis Counselling: [www.crisiscounselling.co.uk](http://www.crisiscounselling.co.uk).

NHS: <https://www.nhsinform.scot/>

ACAS: <https://www.acas.org.uk/sexual-harassment>

Stress:        0800 389 7851 (24hr helpline)  
                  0800 435 768 (face-to-face & structured appointments)

### **Witness to unwanted conduct of sexual nature**

Tackling sexual harassment is everybody's responsibility. You do not have to be the recipient or target of sexual harassment to raise a concern or make a complaint. If you see it happening or become aware of it, you should report it in line with '*Reporting procedure & dealing with all Sexual harassment complaints*' if you feel able to do so.

Your actions can be important in helping create a culture free from sexual harassment.

### **Individuals found to be in breach of the principles of this policy**

Where individuals are found to be in breach of this policy whether that be employees, agency worker and consultants this will be dealt with in accordance with WWHC's Code of Conduct, Disciplinary & Grievance Policy and other relevant policies. This may result in disciplinary action up to and including dismissal.

### **General Data Protection Regulations**

The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Privacy Policy will be used and the basis for processing your data is provided in WWHC's employee privacy notice.

## Appendix 2 – Sexual Harrassment Risk Assesment

### Purpose

This assessment identified the workplace environments in social housing, particularly within West Whitlawburn Housing Co-operative (WWHC), at risk of sexual harassment. Completing a risk assessment of this nature is a requirement under the Worker Protection Act (2023), effective October 2024. It further sets out the remedial actions to be taken by WWHC.

This assessment covers the following types of workplace environments:

**Workplace culture, formal working environments, informal working environments, working across the WWHC estate and third parties (covered throughout).**

### Scope

This assessment covers all employees, contractors and visitors.

1) Workplace Culture

Topic	Potential Risk	Who is at risk?	Mitigation Controls	Actions to strengthen current controls	Action By	Date
<b>Power Imbalances</b>	Committee, management or higher-grade staff using their authority/status to engage in inappropriate behaviour with subordinates. Subsequent risk that subordinates may feel they cannot raise concerns due to said authority/status.	Employees	<ul style="list-style-type: none"><li>Staff and Committee Codes of Conduct</li><li>Disciplinary and Grievance policy</li><li>Whistleblowing policy</li></ul>	Introduce Anonymous reporting system(s).	GC / SM	
	Male/Female dominated environments where one sex feels obliged to carry out tasks/actions due to pressure from the opposite sex.	Employees	As above			
	Male/Female dominated environment where staff feel they cannot raise concerns due to lack of action/fear of persecution from the opposite sex.	Employees	As above			
<b>Innuendos and jokes</b>	Innuendos and/or jokes being the workplace norm that may cause offence or harass staff.	Employees	<ul style="list-style-type: none"><li>Dignity at Work policy</li><li>Disciplinary and grievance policy</li><li>Staff and Committee code of conduct</li><li>Equality and Diversity policy</li><li>Equality and diversity training</li></ul>	Periodic reminders to be sent to staff team about conduct and acceptable behaviour (ties in with annual review of code of conduct).	GC / SM +line managers	
	Innuendos and/or jokes that cause harassment to staff not being properly investigated or handled correctly/consistently/fairly. Further risk that, when raised with third parties, the actions may not be taken seriously/actioned in line with		As above <ul style="list-style-type: none"><li>Ensure that managers and senior staff are trained on handling complaints and grievances in line with policies.</li><li>Declarations of Interest with management arrangements where appropriate.</li></ul>	Refresher training to be carried out annually (ties in with annual review of code of conduct).	GC / SM	



	WWHC requests.					
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2) Formal working environments

Topic	Potential Risk	Who is at risk?	Mitigation Controls	Actions to strengthen current controls	Action By	Date
<b>Sexual harassment of employees in the office/Concierge station</b> (office hours).	Risk of unwanted physical contact, comments, suggestions to employees by tenants, visitors, contractors or other third parties.	Mainly staff who are in customer-facing roles (Housing, Property, Concierge and Reception).  All other staff	<ul style="list-style-type: none"> <li>Unacceptable actions policy (available on website and published in newsletters)</li> <li>Expected behaviour posters displayed at reception and interview rooms</li> <li>Panic buttons at reception, interview rooms and Concierge main desk</li> <li>Minimum 2-person policy at reception area.</li> <li>Incident reports</li> <li>Clauses within the Maintenance policy that sets out contractor expectations</li> <li>Lone working policy and procedures</li> <li>Training (lone worker and sexual harassment awareness)</li> <li>Radios (Concierge)</li> <li>Visit in Pairs</li> <li>Person warnings recorded on HomeMaster</li> <li>MAPPA in place to manage risks posed by offenders (See HOHS)</li> <li>CCTV</li> </ul>			
<b>Sexual harassment of employees in the office/Concierge station</b> (OOH).	Risk of unwanted physical contact, comments, suggestions to employees by tenants, visitors, contractors or other third parties. Further risk that the number of available contacts for help decreases OOH.	Concierge staff  Other staff called out on emergencies or overtime shifts  Staff who work evening meetings	As above <ul style="list-style-type: none"> <li>Panic alarms (at main desk)</li> <li>Person warnings available in Concierge station</li> <li>Phones available at main desk, Concierge managers office and rest facilities</li> <li>Lockable doors between working/rest areas</li> <li>Staff encouraged to contact the Police for incident support</li> </ul>			
<b>Sharing transport to work / conferences / events / training / meetings / WWHC properties</b>	Risk of unwanted physical contact, comments, suggestions to employees by other employees, committee or third parties.	Employees who car-share on regular basis  All employees who may share lifts /	<ul style="list-style-type: none"> <li>Staff and committee code of conduct</li> <li>Mobiles</li> <li>SOS Fobs / Apps</li> <li>Disciplinary and Grievance policy</li> </ul>			

	Increased risk as staff are isolated from the 'normal' working environment.	transport				
<b>Digital communications</b> (e.g. email, MS teams, WhatsApp, phone calls, online meetings, social media)	Risk of unwanted contact, comments, suggestions to employees by other employees, tenants or contractors due to the 'private' nature of digital communications.	All employees	<ul style="list-style-type: none"> <li>Staff code of conduct</li> <li>Work issued mobile phones</li> <li>Computer use policy</li> <li>WWHC owned and monitored accounts</li> </ul>	Review computer use policy to include clause that harassment or abuse of employees using WWHC accounts or devices will not be tolerated.	RH	Expected 30/09/2025
<b>Inadequate reporting systems</b>	Risk that complaints are not followed up or actioned accordingly creating a mistrusting working environment.	All employees	<ul style="list-style-type: none"> <li>Disciplinary and grievance policy</li> <li>Whistleblowing policy</li> <li>Annual appraisal</li> <li>Staff encouraged to report wrongdoing / concerns as soon as possible</li> </ul>	Annual staff surveys to gauge satisfactions levels / areas for improvement. Introduce an anonymous reporting system(s).	GC / SM	
<b>Use of facilities where staff would be required to shower/change clothing because of work activities</b>	Risk that employees could be sexually harassed when showering or changing clothing.	Employees who carry out property visits	<ul style="list-style-type: none"> <li>Staff code of conduct</li> <li>Private &amp; lockable washing and changing facilities at Concierge station</li> <li>Visits scheduled and appropriate time given so that employees can return home to wash / change clothing if required</li> </ul>	Buy and keep stock of disposable overalls (monitor).	CC / RH	Complete 02/09/2025
<b>Interactions that require physical touch (e.g. first aid)</b>	Risk that employees could be sexually harassed when administering or receiving first aid.	All employees  First aiders	<ul style="list-style-type: none"> <li>Staff code of conduct</li> <li>Employee occupational health and self-referral counselling services</li> <li>First aid training (including consent to administer)</li> </ul>	Complete training of mental health first aider.	MS	19/08/2025

### 3) Informal work environments

Topic	Potential Risk	Who is at risk?	Mitigation Controls	Actions to strengthen current controls	Action By	Date
<b>Socialising out of work</b> (e.g. Christmas parties or events)	Risk of unwanted contact, comments, suggestions and blurred boundaries to employees by other employees or third parties due to the presence of alcohol.	All employees	<ul style="list-style-type: none"> <li>Staff code of conduct</li> </ul>	Senior Staff to create and publicise guidelines for work-related events.	GC / SM	

<b>Personal relationships</b>	Relationships that arise because of work that could increase the risk of sexual harassment.		<ul style="list-style-type: none"> <li>• Declaration of Interest with management arrangements as appropriate</li> <li>• EVH guidance</li> <li>• Employment contracts</li> </ul>			
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4) Working on the WWHC estate

Topic	Potential Risk	Who is at risk?	Mitigation Controls	Actions to strengthen current controls	Action By	Date
<b>Carrying out home visits / inspections</b> (in office hours)	Risk of unwanted physical contact, comments, suggestions to employees by tenants, visitors, contractors or other third parties.	Housing, Property and Concierge staff	<ul style="list-style-type: none"> <li>• Staff to communicate visit locations and estimated return times</li> <li>• Staff in office/Concierge to check-in periodically with those out on the estate</li> <li>• Staff able to raise concerns about attending properties alone and request a 2-person attend if required</li> <li>• Mobile phones</li> <li>• SOS fobs / Apps</li> <li>• CCTV</li> <li>• Lone working policy and procedures</li> <li>• Lone worker training</li> <li>• Person warnings recorded on HomeMaster/ at Concierge station to be checked prior to visit</li> <li>• Default Visit in Pairs policy for all SLC lease properties</li> <li>• Radios (Concierge)</li> </ul>			
<b>Carrying out home visits / inspections</b> (OOH)	Risk of unwanted physical contact, comments, suggestions to employees by tenants, visitors, contractors or other third parties. Further risk that the number of available contacts for help decreases OOH. Risk of false accusations. WWHC recognise that different times of day/days of the weeks may influence tenant behaviour	<p>Concierge staff</p> <p>All other staff who may carry out home visits / inspections in emergency or one-off circumstances</p>	<p>As above</p> <ul style="list-style-type: none"> <li>• Concierge station manned 24/7</li> <li>• Assistance to be sought from authorities/external agencies when required</li> </ul>			

	and therefore may increase the risk of sexual harassment to employees.					
<b>Interactions that require physical touch (e.g. first aid or housing alarm service provision)</b>	Risk that employees could be sexually harassed when administering or receiving first aid in tenants' homes.	Concierge staff	<ul style="list-style-type: none"> <li>First aid training</li> <li>Employee occupational health and self-referral counselling services</li> </ul>			
<b>Interactions with tenants or service users who have a reduced physical or mental health capacity</b>	Risk that employees could be sexually harassed when dealing with those who experience mental or physical health incapacities.	Employees who engage with tenants and service users	<ul style="list-style-type: none"> <li>Mandates / Powers of Attorney in place</li> <li>Person warnings recorded on HomeMaster and at the Concierge station</li> <li>Visit in pairs</li> <li>Agreements in place so that tenants (+NOK's) who require it deal with a dedicated staff member</li> <li>Assistance to be sought from authorities/external agencies when required.</li> </ul>			
<b>False accusations</b>	Risk that tenants, service users or third parties may accuse employees of sexual harassment when carrying out their duties. Those that attend properties alone may experience greater risk of this.	Employees  Male employees	<ul style="list-style-type: none"> <li>Radios / SOS fobs</li> <li>2-person visits (where resource permits)</li> <li>Incidents to be passed to emergency services / other agencies where appropriate</li> <li>Disciplinary and Grievance policy</li> <li>Adjustments to restrict duties pending investigations</li> <li>Staff instructed to leave the property immediately</li> </ul>			

#### Review

<b>Date Risk Assessment Carried Out</b>	15/07/2025	<b>Draft Risk Assessment Reviewed by SLWG</b>	19/08/2025
<b>Reviewed by WWHC Employees</b>	18/09/2025	<b>Reviewed by Management Committee</b>	30/09/2025
<b>Latest Date of Next Review</b>	30/09/2030		

### Appendix 3 - Equalities Impact Assessment

Policy/Project/Service Information			
Lead Officer	R Hosie, CSO		
Policy / Project / Service	Dignity at work	New Policy / Project / Service or revision of existing?	Revision of existing
Is this a reassessment following amendments being required at a previous assessment?	No		
Briefly describe the aims, objectives and purpose of the policy / project / service.	<p>To ensure that all employees, governing body members, contractors or those associated with the work of WWHC are treated with dignity and respect, free from bullying, harassment, sexual harassment, discrimination and victimisation of any nature.</p> <p>Set out standards of behaviour expected for employees, agency workers and consultants of WWHC and the behaviour and standards of third parties.</p> <p>Promote proactive and preventative measures to support positive and respectful working relationships.</p> <p>Provide a process for complaints to be properly managed.</p>		
Who is intended to benefit from the policy / project / service? (E.g. applicants, tenants, staff, contractors)	<p>Applicants for employment</p> <p>Staff</p> <p>Management Committee</p> <p>Contractors</p> <p>Consultants</p>		
What outcomes are wanted from this policy / project / service? (E.g. the measurable changes or benefits to members/ tenants / staff)	Provide a working environment where all backgrounds, cultures, values and lifestyles are respected and treated with dignity at all times.		

Consultation
<b>Who have you engaged and consulted with as part of your assessment?</b> EVH guidance on model policy. Changes made as required by legislation, consultation not required.

Equalities Impact Assessment			
Which protected characteristics could be affected by the policy, practice, or service?		Identify any positive impact/s that could result for each of the protected characteristic groups.	Identify any negative impact/s that could result for each of the protected characteristic groups.
Age	x	Fair treatment regardless of any characteristic. Clear policy and procedure to guide employees,	Mis-treatment as a result of WWHC not following legislation & own policy.

		governing body members, contractors etc.	Reduction in level of service received or opportunities given. WWHC could face legal/regulatory implications and be open to claims.
<b>Disability</b>	<b>x</b>	As above	As above
<b>Gender Reassignment</b>	<b>x</b>	As above	As above
<b>Marriage &amp; Civil Partnership</b>	<b>x</b>	As above	As above
<b>Race</b>	<b>x</b>	As above	As above
<b>Religion/Belief</b>	<b>x</b>	As above	As above
<b>Pregnancy/Maternity</b>	<b>x</b>	As above	As above
<b>Sex</b>	<b>x</b>	As above	As above
<b>Sexual Orientation</b>	<b>x</b>	As above	As above

Action Plan To Mitigate Negative Impact		
What action/s are required to address the impacts arising from this assessment?		
Protected characteristics	Action	Implementation Date
<b>Age</b>	Ensure awareness of policy and procedures by all those associated with the work of WWHC. Provide training and guidance as required to all staff and governing body members.	Ongoing – bi-annual refresher training and at induction.
<b>Disability</b>	As above	
<b>Gender Reassignment</b>	As above	
<b>Marriage &amp; Civil Partnership</b>	As above	
<b>Race</b>	As above	
<b>Religion/Belief</b>	As above	
<b>Pregnancy/Maternity</b>	As above	
<b>Sex</b>	As above	
<b>Sexual Orientation</b>	As above	
<b>Human Rights</b>	As above	

Final Decision	Tick relevant box	Include explanation where appropriate
<b>Approved for implementation without change</b>		
<b>Amend or change the Policy/Project/Service</b>		
<b>Continue the Policy/Project/Service without change (despite impact)</b>		
<b>Stop the Policy/Project/Service</b>		

<b>Lead Officer Signature</b>	R.Hosie
<b>Date</b>	15/11/2024
<b>Date approved by Management Committee/ Sub Committee</b>	30/09/2025