

Equality Impact Assessment (EIA)

It is important to familiarise yourself with the guidance document and attend the EIA workshop before completing this template.

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| Type of Decision: | Policy will be approved by CUPRAG | | |
| Name of Proposal being assessed and Expected Outcome: | Bullying and Harassment Dignity and Respect: Dealing with Bullying and/or Harassment EQ10 | Review Date: | July 2025 July 2026 |
| Who does the proposal affect? | <p>This policy affects all members of the University of Hertfordshire community, including:</p> <ul style="list-style-type: none"> ~30,000 students (including undergraduate, postgraduate, international, commuting and care-experienced) ~2,500 staff Contractors, visitors and stakeholders <ul style="list-style-type: none"> Women, particularly in male-dominated academic or professional environments Racially minoritised students and staff LGBTQ+ individuals (especially trans and non-binary people) Disabled students and staff International students, who may face cultural or linguistic barriers and visa-linked reporting concerns Staff and students from particular religious/ethnic backgrounds e.g. Jewish or Muslim | | |
| Proposal owner: Name of SBU: | Office of the Dean of Students / Equality, Diversity & Inclusion Office / Human Resources | | |
| Reason for EIA (check as appropriate) | <input type="checkbox"/> New proposal <input type="checkbox"/> Change to an existing proposal | <input checked="" type="checkbox"/> Review of existing proposal <input type="checkbox"/> Other (please state) | |
| | | | |
| Organisational approval EIA approved by SBU Name of individual approving the EIA: | Sharon Harrison-Barker, Secretary and Registrar | Signature: <input type="checkbox"/> Tick this box to indicate that you have approved this EIA | |

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| | | Date of approval: | |
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1. Assessing impact

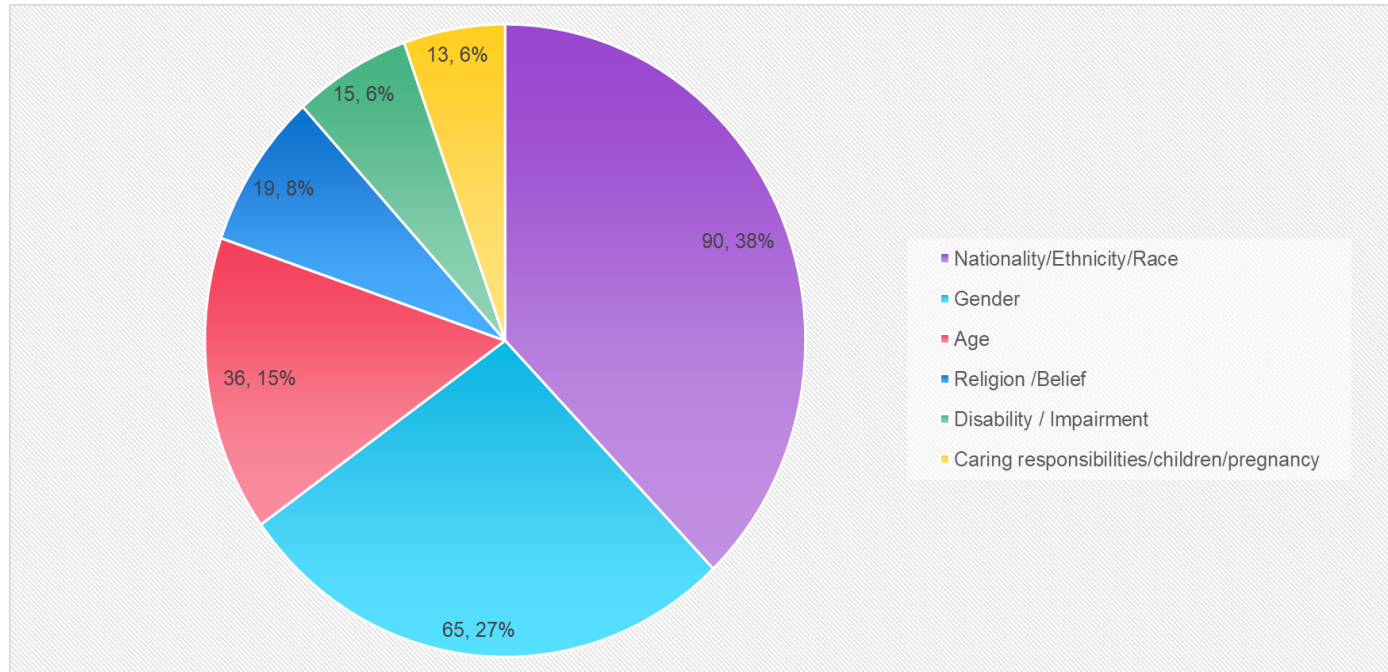
You are required to undertake a detailed analysis of the impact of your proposal on groups with protected characteristics.
 You should refer to the data and evidence above to help you assess and explain what impact (if any) your proposal will have on **each** Protected Characteristic.
 Where there are gaps in data, you should state this in the boxes below and what action you will take to address this in the future.

What does the evidence tell you about the impact your proposal may have on groups with protected characteristics?
 Select the relevant box to indicate whether your proposal will have a positive impact, an adverse impact (minor or major), or no impact.

| Protected characteristic (PC) | For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Select the appropriate box on the right to indicate the outcome of your analysis. It is also important to highlight any positive impact of your proposal in this section. | Positive impact | Adverse Impact | No Impact |
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| Age | The policy protects staff and students of all ages and avoids behaviour which would amount to agist bullying and harassment. Students: Data shows that the 18–21 age group is the most likely to report incidents, with reporting decreasing among older age groups. This suggests younger students may be more vulnerable to bullying and harassment or more familiar with digital reporting tools. The policy should continue to provide accessible, online, and anonymous reporting options to encourage participation across all age groups. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Disability | Reasonable adjustments are available; however, continual training is needed to ensure neurodiverse individuals in particular are not disadvantaged by formal procedures. Students: 15% of reporters stated that disability or impairment was a contributing factor to incidents. This highlights the need for accessible complaint procedures, including flexible meeting formats and adjustments for neurodiverse individuals. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Gender reassignment | Protection from transphobic abuse would be covered in the policy which aims to promote an inclusive culture. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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| Marriage and Civil Partnership | Ensures no harassment or exclusion based on marital status. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pregnancy and Maternity | Covers pregnancy-related discrimination and flexible handling of complaints. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Race | <p>Racially minoritised individuals are more likely to experience and underreport harassment. Ongoing monitoring and staff training needed.</p> <p>Students: A large proportion of reporters did not disclose race or ethnicity, suggesting discomfort or lack of trust in the reporting process. The White British group reported more incidents compared to other ethnic groups, indicating potential underreporting among racially minoritised students.</p> <p>Staff: From 2021 - 2024, 17 staff bullying and harassment cases were recorded across various Schools and Business Units (SBUs). Black African or African British staff were complainants in several cases, often against White British colleagues, indicating both cross-racial complaints and potential underreporting among racially minoritised groups. Cases involved both formal investigations and informal resolutions, with no upheld formal complaints during this period.</p> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Religion or Belief | <p>Policy supports religious inclusion and defines protections. Data relating to complaints from Jewish and Muslim staff and students in particular will need to be monitored and actions amended or implemented as appropriate.</p> <p>Students: Almost 47% of reporters did not declare a religion, while among those who did, Christian (23%), Muslim (16%), and Hindu (12%) faith groups were the most represented. Other represented faiths were very low 1.95% (This group included 3 Buddhist, 1 Jewish and 1 Sikh case).</p> <p>This reinforces the need for religious inclusion measures and careful monitoring of harassment complaints linked to faith.</p> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sex | Female students and staff are statistically more likely to face sexual harassment or bullying. Procedures which are sensitive to the issues around sexual harassment are essential. | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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| | <p>Students: More woman than men make reports, although the gap is closing which may be due to men feeling more comfortable with reporting incidents and concerns than they had in the past.</p> <p>In 2022/2023 29.03% chose to not provide their sex when making a report. This figure dropped to 23.85% the following year 2023/2024, which may reflect people feeling more comfortable disclosing their sex.</p> <p>However, during 2024/2025 nearly a quarter of reporters (24.37%) preferred to not provide their sex when making a report, and with the data not being complete for the academic year it is not possible to conclude that people are becoming more comfortable disclosing their sex at the time of reporting.</p> <p>Staff: Among staff cases between 2021 - 2024, approximately 70% of complainants were female. In some instances, both claimant and respondent were female. This reinforces the need for gender-sensitive support systems and ongoing training.</p> | | | |
| Sexual Orientation | Defines and prohibits homophobic harassment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Socio-economic background (Not a PC) | Offers impartial support (e.g. SU Advice Centre, Dignity and respect Advisers) to reduce disadvantage from lack of social capital. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>This chart shows contributing factors which reporters felt had contributed to the incident reported. Nationality/Ethnicity and Race was the leading reason given which is not surprising considering the large number of international students studying and living on campus. Sex was the second largest reason. This demonstrates the need to ensure continued monitoring of the data and ensuring appropriate support for students experiencing discrimination or harassment based on a protected characteristic.</p> | | | | |



Staff data from 2021–2024 (17 recorded cases) demonstrates that incidents occur across diverse SBUs (e.g., Business School, Dean of Students, Marketing & Communications, HMLS, Creative Arts, SPECS). The majority of cases involved White British staff, either as claimants or respondents, with a smaller but significant representation of Black African or African British and Asian Indian staff as claimants. All formal investigations recorded during this period were either not upheld or resolved informally.

2.1 Cumulative impact

Considering what else is happening within UH and the sector as a whole, could your proposal have a cumulative impact on groups with protected characteristics?



Yes

No



If you selected 'Yes' include details in the space below.

The interaction of this policy with disciplinary, safeguarding, and freedom of speech frameworks may create increased reporting expectations. Coordination and data-sharing will be important. In addition, bullying and harassment can, by its nature, be cumulative and therefore can have increased impacts on the person at the receiving end of such behavior. This needs to be recognised and potential trauma from current and past bullying and harassment recognised and dealt with appropriately through processes. Appropriate training for investigators about such impacts is required.

The staff case data indicates recurring patterns of bullying and harassment that may have cumulative impacts on certain groups (particularly female staff and racially minoritised staff).

2.2 Impact on the University's EDI Objectives

Could your proposal have an impact on the University's EDI Objectives? For example on the diversity of the workforce and what you are trying to achieve via the objectives, the EDI Charter Marks etc.



Yes

No



If you selected 'Yes' include details in the space below.

Promotes cultural safety and dignity across all protected characteristics; supports institutional targets on representation, voice, and belonging.

2.3 Any other impact

Considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc.), could your proposal have an impact on individuals/service users, or other groups (carers, commuting and parent students)?



Yes

No



If you selected 'Yes' include details in the space below.

International Students:

Risk of underreporting due to concerns about visa consequences or unfamiliarity with UK processes.

Need tailored guidance, cultural sensitivity, and assurance that complaints will not affect immigration status.

Freedom of Speech:

The policy respects academic freedom and freedom of lawful expression (UPR FS01), ensuring complaints distinguish between offensive expression and unlawful harassment.

Training and guidance are needed to help students and staff understand these distinctions and avoid chilling effects on open discourse.

External socio-political factors (e.g. gender-based violence in the UK, immigration policy, hate crime trends) may affect community confidence in using the policy. The University must remain responsive and proactive.

3. EIA Action Plan: actions to mitigate/remove adverse impact and promote positive impact

| Protected Characteristic | Positive impact <i>A positive impact is one in which a person or people will experience an advantage or benefit.</i> | Adverse impact <i>An adverse impact is one in which a person or people will experience a disadvantage.</i> | Detail of impact <i>Explain how the proposal will disproportionately impact people who share the characteristic and/or what the effect of that impact will be on those people. This section should be completed whether the impact is adverse or positive. With positive impact, detail the actions you will take to promote the positive impact to the university in the next column.</i> | How will you mitigate or remove any identified negative impacts and/or promote any positive impacts? Can any identified impact be justified for business reasons? If yes, please explain why. <i>If an identified negative impact cannot be removed or mitigated, explain why this can be justified for business reasons. Where you identify negative impact which cannot be justified for business reasons, you should identify any changes you can make to your proposal which will mitigate or eliminate this.</i> | Owner of action <i>Identify who is responsible for mitigation or elimination</i> | Timescale <i>Provide brief timescale for completion of mitigation or elimination</i> |
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| Age | <input type="checkbox"/> | <input type="checkbox"/> | See 'all groups' and 'monitoring' below | | | |
| Disability | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Complex complaints processes may be inaccessible (especially for neurodiverse staff and students) | Ensure procedural flexibility and adjusted meeting formats | HR/DoS | ongoing |
| Gender Reassignment | <input type="checkbox"/> | <input type="checkbox"/> | See 'all groups' and 'monitoring' below | | | |
| Marriage and Civil Partnership | <input type="checkbox"/> | <input type="checkbox"/> | See 'all groups' and 'monitoring' below | | | |
| Pregnancy and maternity | <input type="checkbox"/> | <input type="checkbox"/> | See 'all groups' and 'monitoring' below | | | |
| Race | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Likely underreporting among racially minoritised groups | Monitor reporting rates; ensure cultural competence training for investigators | HR/DoS/EDI | ongoing |
| Religion or Belief | <input type="checkbox"/> | <input type="checkbox"/> | See 'all groups' and 'monitoring' below | | | |
| Sex | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Women disproportionately affected by sexual harassment | Maintain specialist support; include trauma-informed investigation practices | HR/DoS | ongoing |
| Sexual Orientation | <input type="checkbox"/> | <input type="checkbox"/> | See 'all groups' and 'monitoring' below | | | |

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| Socio-economic background (Not a PC) | <input type="checkbox"/> | <input type="checkbox"/> | See 'all groups' and 'monitoring' below | | | |
| International Students (Not a PC) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | May avoid reporting due to visa concerns | Provide assurances about immigration neutrality of complaint process | DoS | ongoing |
| Freedom of Speech (Not a PC) | | Risk | Potential confusion between offensive views and harassment | Clarify definitions in training and guidance; uphold lawful academic freedom | Governance / Legal / EDI | ongoing |
| All Groups | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Comprehensive definitions, inclusive language, strong support structures – encouraging reporting | <p>Raise awareness of policy via campaigns, Dignity & Respect Advisers</p> <p>Introduce location-based awareness initiatives and security interventions in areas with recurring reports, particularly College Lane and De Havilland residences.</p> <p>Incorporate seasonal awareness campaigns (e.g., October and February) to coincide with peak reporting periods, raising visibility of support resources during these high-risk times.</p> <p>Ensuring appropriate training for advisers on discrimination and harassment based on protected characteristics.</p> | Marcomms/EDI/DoS/HR | ongoing |
| Monitoring | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Without data, trends and inequities remain invisible | <p>Annual monitoring of the new Speak Up system (which replaced Report and Support in June 2025) will track demographic trends, incident types, and locations to identify vulnerable groups and patterns (e.g., high incident rates in Halls of Residence and Forum Nightclub).</p> <p>Ensure data gaps (e.g., non-disclosure of sex, race, and religion) are addressed through clearer communication on data privacy and why demographic data is important for equality measures.</p> | DoS/HR | annual |

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| | | | | Continue annual tracking of staff bullying and harassment cases by protected characteristic (race, sex) to identify persistent patterns. For example, between 2021 - 2024, 17 staff cases were recorded, with a concentration in specific SBUs such as Business School and Dean of Students (23-24). | | |
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4. Public Sector Equality Duty (PSED)

The PSED requires public bodies to pay 'due regard' to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

How does your proposal meet the Public Sector Equality Duty?

Eliminating unlawful discrimination, harassment and victimisation through robust definitions and a zero-tolerance approach

Advancing equality of opportunity by offering fair and adjusted processes

Fostering good relations through education, mediation, and restorative practices where appropriate

This policy is broadly inclusive and comprehensive. However, targeted improvements around procedural clarity, cultural sensitivity, and data monitoring are needed to fully realise its EDI and freedom of speech commitments.

5. Outcome of the Equality Impact Assessment (select the option that applies)

Outcome 1 No impact identified

There have been no equality issues identified as a result of your assessment which disproportionately impact people with reviewed Protected Characteristics.

Outcome 2 Make adjustments to the proposal

Select this option where there has been an identified impact and you are able take mitigating action to lessen this.

Minor improvements are suggested to further promote the policy to underrepresented or vulnerable groups and reinforce protections during investigation stages (e.g. support for neurodivergent students, expanded awareness for LGBTQ+ groups). This relates more to the implementation of the policy than to the wording of the policy itself.

Outcome 3 Continue the proposal without adjustments for adverse impact

Select this option where potential/actual adverse impact has been identified, however, the proposal meets critical business need, or the benefits of the proposal outweigh the adverse impact.