
Report to: Council

Date of Meeting: 21 May 2026

Subject: HR Policies

Report by: Senior Manager (HR and Workforce Development)

1.0 Purpose

1.1. This paper invites Council to approve the following policies and procedures:

- Additional Employment and Extra Mural Activities Policy & Procedure
- Corporate Security Policy
- Mental Health, Stress & Wellbeing Policy; and
- Smoking Policy

2.0 Recommendations

Council is asked to:

- 2.1. Challenge and comment as appropriate.
- 2.2. Agree the policies and procedures.
- 2.3. Note the attached Equality Impact Assessments.

3.0 Considerations

- 3.1. HR and Workforce Development continues, as part of its rolling programme, to review and update the Council's policies and procedures related to HR, H&S, OD and Payroll.
- 3.2. In order to ensure collaborative and partnership working the Council's policy group, which comprises TU colleagues, Management and HR, meet regularly to review and agree new/revised policies and procedures.

Additional Employment and Extra Mural Activities Policy & Procedure

- 3.3. Clackmannanshire Council aims to recruit and retain high calibre employees and ensure a commitment to equal opportunities. We recognise that on occasion, employees may wish to take on additional employment or voluntary

work and this policy is intended to allow employees this flexibility while fulfilling our obligations in relation to the Working Time Regulations, relevant legislation and Clackmannanshire Council's Code of Conduct for Officers.

- 3.4. Via Policy group full agreement was reached on all aspects of this new policy and procedure, and no comments were received on the EQIA.

Corporate Security Policy

- 3.5. This policy ensures that all employees are fully aware of the security risks associated with their roles and responsibilities, and to provide clear guidance on the measures and procedures in place to maintain a safe and secure working environment for everyone.
- 3.6. Through this policy the Council will take all reasonable measures to safeguard the security and safety of members, staff, visitors and third parties, whilst within or situated on Council premises.
- 3.7. The policy applies to all Clackmannanshire Council employees, including those on temporary, casual, or fixed term contracts. It also extends to all consultants, contractors, and third parties engaged by or acting on behalf of the Council.
- 3.8. Via Policy group, full agreement was reached on all aspects of this new policy, and no comments were received on the EQIA.
- 3.9. At Tripartite, discussion on the policy's applicability, and appropriateness to the Elected Member role were noted. As a result, an amendment to the policy was made removing the bullet point at section 4.2, relevant to Elected Members, as follows:

- "When arranging meetings elected members are to ensure consideration has been given to their personal security whilst selecting or agreeing the location and time of the meeting. Member Services must be informed of the meeting and where the meeting takes place out with the council estate an appropriate risk assessment should have been carried out in conjunction with Member Services".

- 3.10. In its place a separate protocol, offering more tailored and detailed guidance on this subject, will be drafted by the Emergency resilience Team and brought forward at a later date.

Mental Health, Stress & Wellbeing Policy

- 3.11. The Council is committed to ensuring the health and welfare of employees, including their mental as well as physical health and wellbeing. As an employer, we aim to create and maintain a workplace environment that promotes and supports good mental health and wellbeing for all employees.
- 3.12. This policy aims to create a working environment where the mental health and wellbeing of employees is paramount and where colleagues feel valued and protected. It sets clear responsibilities for ensuring a safe and healthy workplace, and positive mental wellbeing, for all employees.

- 3.13. Via Policy group, full agreement was reached on all aspects of this policy, and no comments were received on the EQIA.

Smoking Policy

- 3.14. The purpose of the Smoking Policy is to comply with the Smoking, Health and Social Care (Scotland) Act 2005 and the Prohibition of Smoking in Certain Premises (Scotland) Regulations 2006.
- 3.15. The Policy also supports the Council in complying with the Health and Safety at Work Act (1974), whilst also demonstrating a commitment to the health, and safety of all our employees.
- 3.16. Via Policy Group, and the Executive Health and Safety Committee, full agreement was reached on all aspect of this policy, and no comments were received on the EQIA.

4.0 Sustainability Implications

- 4.1. None.

5.0 Resource Implications

5.1. Financial Details

- 5.2. The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate. Yes
- 5.3. Finance have been consulted and have agreed the financial implications as set out in the report. Yes

5.4. Staffing

- 5.5. TU's have been consulted in the development of the policies and procedures.

6.0 Exempt Reports

- 6.1. Is this report exempt? Yes (please detail the reasons for exemption below) No

7.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

(1) Our Priorities

Clackmannanshire will be attractive to businesses & people and ensure fair opportunities for all

Our families; children and young people will have the best possible start in life

Women and girls will be confident and aspirational, and achieve their full potential

Our communities will be resilient and empowered so that they can thrive and flourish

(2) **Council Policies**

Complies with relevant Council Policies

8.0 Impact Assessments

8.1 Have you attached the combined equalities impact assessment to ensure compliance with the public sector equality duty and fairer Scotland duty? (All EFSIAs also require to be published on the Council's website)

Yes

8.2 If an impact assessment has not been undertaken you should explain why:

9.0 Legality

9.1 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes

10.0 Appendices

10.1 Please list any appendices attached to this report. If there are no appendices, please state "none".

- Corporate Security Policy
- Corporate Security Policy EFSIA
- Additional Employment & Extra Mural Activities Policy
- Additional Employment & Extra Mural Activities Procedure
- Additional Employment & Extra Mural Activities Policy EFSIA
- Smoking Policy
- Smoking Policy EFSIA
- Mental Health, Stress, and Wellbeing Policy
- Mental Health, Stress, and Wellbeing Policy EFSIA

11.0 Background Papers

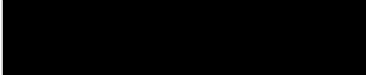
11.1 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)

Yes (please list the documents below) No

Author(s)

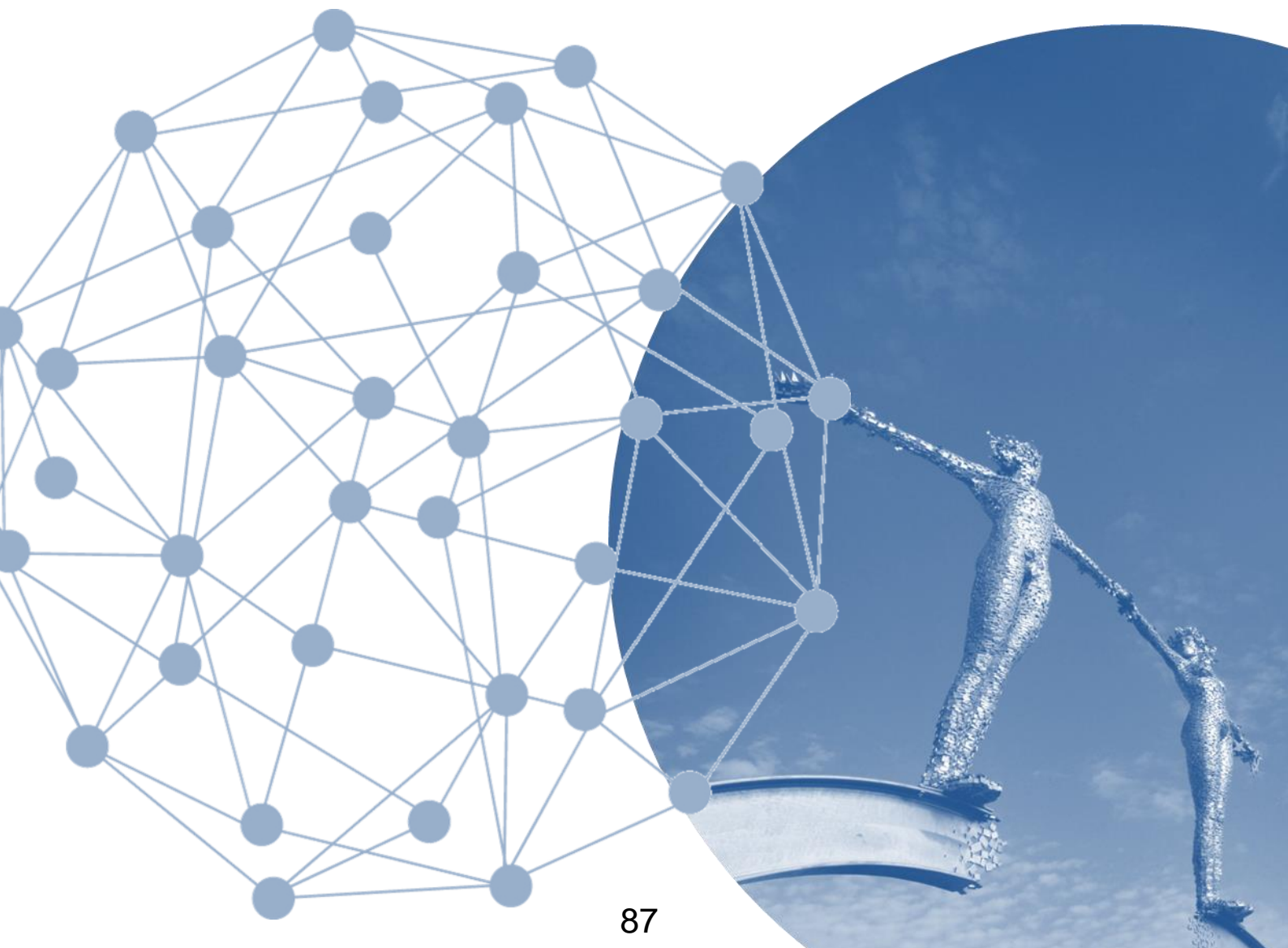
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Approved by

NAME	DESIGNATION	SIGNATURE
Chris Alliston	Head of Corporate Services	



Corporate Security Policy 2026



DOCUMENT CONTROL SHEET:

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Owner:	David Webster
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Contact:	David Webster

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Version:	Date:	Summary of Changes	Name:	Changes Marked:
		<u>Draft</u>		<u>N/A</u>

1. Policy Statement

- 1.1. A safe and secure environment for everyone is essential for the council to be able to work and provide services. While security and safety are a priority there is a fine balance to be struck between mitigating risk and impacting our ability to operate. It is important to understand the threat, our roles and responsibilities as well as the policies we must follow.
- 1.2. Our security measures should be strong enough to deal with a range of threats without hindering us. Whilst terrorism remains an ever-present threat, we must be conscious that disgruntled members of the public, staff and other third parties have the potential to pose a range of threats that are more likely to impact the safe delivery of Council services. A robust security culture is necessary to ensure the safety of all employees, customers, visitors and contractors.

2. Purpose and Scope

- 2.1. The purpose of this policy is to ensure that all employees are fully aware of the security risks associated with their roles and responsibilities, and to provide clear guidance on the measures and procedures in place to maintain a safe and secure working environment for everyone. Through this policy the Council will take all reasonable measures to safeguard the security and safety of all members, staff, visitors and third parties, whilst within or situated on Council premises.
- 2.2. This policy applies to all Clackmannanshire Council employees, including those on temporary, casual, or fixed-term contracts, as well as elected members. It also extends to all consultants, contractors, and third parties engaged by or acting on behalf of the Council.
- 2.3. These policies apply across the Council Estate; this includes Education Settings and Social Work premises though it is noted that further policies and/or protocols may be in place across these settings.
- 2.4. This policy does not yet include guidance in line with Terrorism (Protection of Premises) Act 2025 otherwise known as Martyn's Law. Guidance is yet to be issued by the Home Office and the Regulator, Security Industry Authority (SIA), when this guidance is issued this policy will be reviewed.

3. Overarching Principles

The following principles are common to every area of security:

- Working in a safe and secure environment is everyone's right and responsibility and security must be always considered when delivering Council services efficiently and effectively.
- Risk management is key and should be driven from the chief executive. Assessments will identify potential threats, vulnerabilities and appropriate controls to identify and reduce the risks wherever possible.
- Attitudes and behaviours are fundamental to good security. The right security culture, proper expectations and effective induction and training are essential.

- Processes are in place for recording, reporting, investigating, managing and resolving security incidents. Where systems have broken down or individuals have acted improperly, the appropriate action will be taken.

4. **Responsibilities**

4.1. Senior Leadership Group (SLG)

The Senior Leadership Group has overall responsibility for security matters and for administering this through the setting of this policy, supporting those responsible for implementation and holding all staff accountable to adherence with it.

Through existing processes such as internal audit, the SLG will review the effectiveness of this policy, and the procedures stated within.

The SLG will ensure a Graduated Security Plan (GraSP) is in place to inform services and Premises Duty Holders of required activity based on the UK Terrorism Threat Level and UK Alert Status.

4.2. Elected Members

Elected Members will work with Member Services to ensure that all activities and duties they undertake in the performance of their role comply with this policy, this includes:

- ID badges are to be worn at all times within Council properties.
- ID badges are to be removed and placed out of view when out in public
- Report any lost or misplaced ID badges to idcard@clacks.gov.uk This should be reported as quickly as possible to maintain security, and to enable a replacement pass to be issued.
- When arranging meetings elected members are to ensure consideration has been given to their personal security whilst selecting or agreeing the location and time of the meeting. Member Services must be informed of the meeting and where the meeting takes place out with the council estate an appropriate risk assessment should have been carried out in conjunction with Member Services.
- Comply with any building specific requirements at any property within the council estate.
- Sign in to all buildings and where Paxton is in place badge in and out.
- Ensure that offices and meeting rooms are secure when vacating them including closing doors and windows as appropriate.
- When disposing of any sensitive documents these must be placed into the confidential waste bins and disposed appropriately
- Lock computers and phones when away from desks.
- Comply with IT security and acceptable use policies to ensure that council mobile devices (ipads, mobile phones, laptops) are secure at all times

4.3. Managers and supervisors

Managers and supervisors at every level will ensure that support and resources are available to staff to enable this policy and procedures to be implemented effectively. This may include assigning staff to support procedures within premises in support of the premises duty holder fulfilling their obligations, such as supporting evacuations, responding to alarms and supporting invacuations. Where issues are identified managers will support resolution through the appropriate individuals.

Managers and supervisors play a pivotal role in promoting security and providing leadership within their service areas. They will ensure staff are aware of their own responsibilities and the procedures as well as holding them accountable for following council policy.

Managers and supervisors are responsible for ensuring that staff are made aware and have access to this policy and subsequently are to ensure staff comply with all policies. Managers are to ensure those staff without access to Connect have access to this policy and those referenced via other means appropriate to the service. Line managers are to ensure during induction that all new employees are issued with an ID badge on their first day of employment and are briefed about their security responsibilities. They are responsible for ensuring that staff follow the agreed leavers process and that Staff ID badges and other equipment are returned on the staff members final working day. Managers and supervisors are responsible for ensuring that ID badges are not retained by services and shared with other members of staff. ID Badges not allocated to a current employee should be returned in line with the leavers process.

All managers are responsible for ensuring that all work undertaken by staff complies with this policy, as well as any relevant service-level policies, procedures, or plans. Where appropriate, risk assessments must be conducted on a case-by-case basis, and it is the manager's duty to ensure these assessments are carried out.

A crib card has been included at Appendix 3 to support managers

4.4. Senior Manager Property

The Senior Manager for Property through their team, and in coordination with the premises duty holders, is responsible for ensuring that security infrastructure across the council estate is in place, maintained and where necessary repaired or replaced. They will work with the relevant premises duty holder for each premises to ensure that property staff have appropriate access to carry out the necessary works and will ensure that defect rectification works are amongst their priority works as needed.

4.5. Premises Duty Holders

Premises Duty holders are responsible for the effective day to day management and enforcement of the security policy within their premises. A crib card has been included at Appendix 3 to support Premises Duty Holders.

All premises duty holders are responsible for:

- Conducting a premises risk assessment identifying required security infrastructure and vulnerabilities. i.e. CCTV, Access control systems and vulnerable points.
- Reporting all Security incidents including suspicious activity, suspicious packages and bomb threats to Police Scotland if not done by a member of staff and report the incidents to the Resilience Team. Reporting to the Resilience Team is done so in accordance with Appendix 2
- Working with the Senior Manager for Property and their team in ensuring that security infrastructure is in place and maintained.
- Comply with all policies, procedures and systems of work as laid out by the Property Service with relation to security, including but not limited to policies on Asset Management.

- Creating and maintaining emergency plans for evacuation, invacuation and lockdown in line with the council's template and guidance (Appendix 1). These plans are to be integrated with First Aid and Fire Evacuation procedures to ensure a unified approach.
- Identifying (with support from managers and supervisors) staff within the premises to support them in responding to security incidents across the full operating period of the building.
- Ensuring a suitable process is in place for reporting suspicious activity or items within the premises.
- Ensuring suitable access control processes are in place for contractors and visitors.
- Where necessary ensuring suitable meeting spaces have been identified and given additional measures for the safety of staff and visitors, i.e. Panic Alarms, external visibility to reception staff and internal locking mechanisms supported by external keys to create refuge points. All of these are to be recorded in a premises meeting room procedure
- Ensuring that suitable signage is in place and maintained with regards to local arrangements, such as at entrances regarding Paxton scans and tailgating.
- Ensure that regular cascades are issued regarding security processes for the premises, particularly where updates to processes are made or after security incidents.

4.6. Resilience team

The Resilience team will keep a central record of all security incidents across the council estate. This record will be used to track trends and as necessary engage with the Senior Leadership Group and Police Scotland should a theme be identified. The Resilience team will be responsible for the operational management of Graduated Security Plan (GraSP).

4.7. Health and Safety

The Corporate Health and Safety Team is available to offer advice, support, guidance, and training on risk assessments. While they bring valuable expertise in health and safety practices, they may not have detailed knowledge of the specific tasks carried out across all Council services. Therefore, it remains the responsibility of individual teams to develop their own risk assessments. These assessments will be reviewed as part of the Health and Safety Team's independent audit and scrutiny process.

4.8. All Staff

All staff are responsible for following the procedures for personal and premises security as well as any instructions issued by responsible persons. Staff should work collaboratively to promote security culture through challenging, where they feel comfortable, others and referring colleagues to policies and procedures where breaches or a lack of knowledge is identified. Failure of staff to abide by the principles and policies within this document as well as those laid out in supporting instructions may lead to disciplinary proceedings. To support staff, training will be provided as well as continuous general awareness briefings. All employees have a legal right to report an incident in which they have been involved to the police. Where a report has been made to Police by the Council, staff information may be shared with them should it be deemed necessary for staff safety.

- Staff ID badges are to be worn at all times within Council properties, where the nature of the work being conducted does not make this safe to do so, the ID badge should be placed away for the duration of the work but retained upon the staff members person.
- Ensure that ID badges are not shared with other members of staff.

- Staff ID badges are to be removed and placed out of view when out in public unless attending a location as part of their work i.e. Housing officers attending a property
- Report any lost or misplaced Staff ID badges to idcard@clacks.gov.uk This should be reported as quickly as possible to maintain security, and to enable a replacement pass to be issued.
- Comply with the agreed leavers process and that Staff ID badges and other equipment is returned on the staff members final working day.
- Where relevant, staff are to ensure compliance with the Councils Lone Working Policy available on [Connect](#)
- Staff are to report immediately to their line managers or supervisors and Health and Safety any threats made to them either in person or via digital means. The employees line manager will support them in reporting this via the Councils Health and Safety Management System, EVOTIX.
- When arranging meetings with members of the public, contractors or other third parties, staff are follow the guidance laid out in the Councils Personal Safety Policy available on [Connect](#)
- Where a meeting is to be held with a member of the public that it is reasonably believed may be on the Potentially Violent Persons Database, services are to comply with the Potentially Violent Person Database Policy, available on [Connect](#), Personal Safety Policy, available on [Connect](#), and any service specific policies. Where this meeting takes place in a council property it is to comply with any premises specific procedures.
- Staff must comply with any building specific requirements at any property within the council estate.
- Staff must sign in to all buildings and where Paxton is in place badge in and out.
- Staff, where they feel comfortable, should challenge colleagues, visitors and contractors not complying with this policy or local security arrangements. Where a staff member feels unable to challenge, they should report any concerns noted to their line manager, supervisor or the premise duty holder who should take appropriate actions. Thereafter the incident should be recorded in evotix.
- If challenged, staff should be careful to respond respectfully understanding the requirements of everyone in relation to security measures.
- Staff are to ensure when transiting through external doors they are closed behind them.
- Staff are not to allow others to follow them through doors without scanning ID badges unless they are escorted visitors or contractors.
- Staff should ensure that offices and meeting rooms are secure when vacating them including closing doors and windows as appropriate.
- Staff should ensure that confidential information is secured at all times, with particular care to ensure information is not left on a desk or in meeting rooms overnight and is not left in the vicinity of windows.
- When disposing of any sensitive documents these must be placed into the confidential waste bins and disposed appropriately
- Staff should ensure that they lock computers and phones when away from desks.
- Staff must comply with IT security and acceptable use policies to ensure that council mobile devices (ipads, mobile phones, laptops) are secure at all times
- Report all suspicious activity or packages to the premises duty holder, in their absence an appropriate manager or Health and Safety.
- Where a bomb threat is received via telephone, if able to do so, whilst on the phone follow the bomb threat crib at Appendix 1, report the incident to Police Scotland and the

Premises Duty Holder. If received via email report the incident to Police Scotland and the Premises Duty Holder.

5. Arrangements

5.1. Contractors

Premises Duty Holders or relevant staff arranging works, must ensure that contractors are fully briefed on local security arrangements, are only given access to areas they require to complete their task and, where deemed necessary, escorted.

5.2. Visitors

Visitors are the responsibility of the individual staff member arranging their visit, staff must ensure:

- Visitors are briefed on local security arrangements.
- Visitors are signed in and issued an appropriate pass and that this is worn and displayed throughout their visit.
- They remain with their visitor throughout the visit and escort them during any evacuation or other security incident.
- They identify if their visitors have any additional needs in an emergency incident that might hinder their safety or the safety of others.
- That, if the meeting is taking place in council premises, that the meeting is held in an appropriate venue and that adequate security arrangements are in place for staff. i.e. panic buttons, designated meeting spaces, etc
- If the visit may result in the visitor having potential access to protected information, they must ensure mitigation is in place to prevent data breaches.
- When, for what ever circumstance, the responsible staff member is required to leave their visitor they are to ensure they pass the responsibility to another staff member for the duration of the visit.
- Where visitors are persons of public interest, such as MPs and MSPs, the event organiser should follow the Protocol for Ministerial visit and visits by MSPs and MPs found on [Connect](#).
- Where a Royal Visit is taking place in Clackmannanshire, whether on the council estate or elsewhere and whether organised by the Council or a community/third party, the Royal Visits Protocol (available on Connect) should be followed to determine the appropriate level of Council involvement,

For locations such as Libraries or receptions to council buildings where visitors do not have planned visits the above listed provisions do not apply. The responsibility for these visitors will fall to the staff manning those locations, they must ensure the below:

- A regular walk around of the premises is conducted to determine where and how many visitors are on the premises.
- Staff are to support visitors in the event of an evacuation or other security instance.
- Staff are to ensure IT systems and restricted offices or other sections of the premises are kept secure when not in use.

5.3. Service security

In the delivery of service level work security for staff, contractors other third parties including members of the public must be a key consideration. Services may be required to comply with relevant UK or Scottish Government Legislation with regards to their responsibilities to members of the public accessing their service.

Where services conduct work that may have security implications which are specific to that service, policies, procedures or plans may be in place or risk assessments should be carried out on a case-by-case basis for the safe and secure delivery of the service. Examples include legislation on Child Protection, Fleet Services usage policies, Elections policies and procedures etc.

5.4. Training

The council will make available training for staff in line with current national guidance, utilising existing resources of Protect UK. This training will form part of the mandatory training package.

6. Monitoring and Review

This document is subject to monitoring by management and Trade Unions on an ongoing basis. Revisions and updates will be implemented by the Council following consultation with recognised Trade Unions.

Policy Name	Security Policy
Department	Partnership & Performance
Policy Lead	Emergency Resilience Officer
Equality Impact Assessment	
Full EQIA required	Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/>
Policy applies equally to all Council employees and does not negatively impact on any group which falls within any of the 9 protected characteristics	
Date Full EQAI complete	N/A
Date Approved	
Review Date	



Appendix 1

The below emergency plan templates are to be used to support the creation of emergency plans for council buildings. They are a guide for plans and as such while generic have specific aspects to guide creation of plans. Plans must be specific to the building and take appropriate regard for the buildings design, infrastructure and usage. Separate plans have been added to Schools Business Continuity Plans.

This guidance is aimed to support the creation of plans.

Evacuation

Consideration must be made to the type of evacuations that may be needed and the reason for evacuation when creating these plans. Evacuation plans should cover specifics for the three types of evacuation:

1. A general evacuation is a set plan evacuation where known emergency routes and muster locations are used, this is most suitable for a Fire Evac but may be suitable for a Bomb threat, Gas leak etc generally initiated by an alarm system.
2. A controlled evacuation where staff are directed to use set routes and evacuate in a certain order. This is most suitable where a known threat exists on a certain evacuation route such as structural issues, flooding or a bomb threat.
3. Place of Safety – this is a controlled evacuation where Police or Senior leadership move staff to a known place of safety due to an incident.

A clear method of signalling evacuation must be determined and communicated to staff, making allowance for the different types of evacuation. It is appropriate to appoint key staff to support an evacuation, these staff must be appropriately trained and informed. When considering staff, it is important to ensure working patterns are accounted for to allow for coverage of the full operational period of a building.

Invacuation

A form of evacuation where staff are kept within a building but moved to a place of safety. Whilst this place of safety may need to change dependent upon the situation establishing several known suitable locations which can accommodate staff is important. Injured staff should so far as reasonably practical be kept separate from other staff to allow for appropriate first aid provision and the maintenance of their privacy. It must be acknowledged that in choosing an invacuation location this may not be suitable for staff covered under a Personal Emergency Evacuation Plan (PEEP), in these instances, all efforts must be made to support those staff in accessing the same location, where this is not possible another suitable location should be identified that is accessible to staff covered in a PEEP.

A clear method of signalling invacuation must be determined and communicated to staff. It is appropriate to appoint key staff to support an invacuation, these staff must be appropriately trained and informed. When considering staff, it is important to ensure working patterns are accounted for to allow for coverage of the full operational period of a building.

Lockdown

A lockdown would be used for a known internal threat, in this instance it is best to allow staff to escape from the threat by employing the Run, Hide, Tell methodology. Plans should make allowances for this but should also consider action to hinder the threat. Identifying key doors, lifts or other means of access that an intruder may use and putting measures in place to hinder their usage may be suitable, where such measures are in place it is appropriate to identify key staff to act in this situation. It must be acknowledged that in choosing these lockdown points and in making the decision to take action to prevent their use, cannot be taken

lightly as by doing so may put some staff at increased risk whilst it mitigates the risk to others.

EVACUATION – e.g. Fire, Gas Leak, Bomb Threat

Plan Control	
Premises	
Premises Duty Holder	
Date Reviewed on	

Signals	
Signal for fire evacuation	
Signal for bomb evacuation	
Signal for all-clear	

Assembly points - fire evacuation	
Fire evacuation assembly point A	
Fire evacuation assembly point B	

Assembly points - bomb evacuation	
Bomb evacuation assembly point 200m	
Bomb evacuation assembly point 400m	

Named Staff and roles	

If a building has been evacuated and it is not possible to return in the short-term service level Business Continuity plans are to be enacted.

Invacuation – e.g. Fire in adjacent property, public disorder,

Plan Control	
Premises	
Premises Duty Holder	
Date Reviewed on	

Signals	
Signal for shelter	
Signal for all-clear	

Safe Locations	
Central Locations for all staff to invacuate	
Staff requiring additional support	
Injured individuals	

Named Staff and roles	

Upon hearing the shelter signal, take the action below.

Ref	Initial response - shelter	Tick / sign / time
	Dial 999 as soon as possible – delegate if necessary	
S1	Ensure all staff are inside the building	
S2	If appropriate, move staff away from the incident (e.g. to the other side of the building).	
S4	If sheltering from an environmental hazard (e.g. a smoke plume) ensure all doors and windows are closed and ventilation / air circulation systems are switched off.	
S5	Check for missing / injured staff, visitors and other third parties.	

S6	In conjunction with senior leadership/IMT notify other staff.	
S7	Remain inside until an all-clear has been given, or unless told to evacuate by the emergency services.	

LOCKDOWN – e.g. intruder,

Plan Control

Premises	
Premises Duty Holder	
Date Reviewed on	

Signals

Signal for lockdown	
Communication method during incident	
Signal for all-clear	

Lockdown

Rooms most suitable for lockdown – with multiple ways out	
Entrance points (e.g. doors, windows) which should be secured	
Communication arrangements	<ul style="list-style-type: none"> ▪ Two-way radios ▪ Classroom telephones ▪ Mobile phones ▪ Instant messaging / email

Named Staff and roles

Upon hearing the lockdown signal, take the action below. If someone is taken hostage on the premises, the rest of the site should be evacuated if appropriate.

Ref	Initial response - lockdown	Tick / sign / time
	Dial 999 as soon as possible – delegate if needed.	
L1	Ensure all staff are inside the building. Alternatively, ask staff to hide or disperse if this will improve their safety.	

L2	Lock / secure entrance points (e.g. doors, windows) to prevent the intruder entering the building.	
L3	<p>Ensure people take action to increase protection from attack:</p> <ul style="list-style-type: none"> ▪ Block access points (e.g. move furniture to obstruct doorways) ▪ Sit on the floor, under tables or against a wall ▪ Keep out of sight ▪ Draw curtains / blinds ▪ Turn off lights ▪ Stay away from windows and doors 	
L4	Ensure that staff, visitors and third parties are aware of an exit point in case the intruder does manage to gain access.	
L5	If possible, check for missing / injured staff, visitors and other third parties.	
L6	Remain inside until an all-clear has been given, or unless told to evacuate by the emergency services. Remember you may be treated as a suspect whilst police confirm information	

BOMB THREATS

- + **If you receive a telephone call from someone who claims to have information about a bomb, record as much information as possible.**

Time of call:

.....

Telephone number you were contacted on:

.....

Exact wording of the threat:

.....

.....

- + **Stay calm. Being cautious, and without provoking the caller, try to ask the questions below.**

Where is the bomb right now?

.....

What will cause it to explode?

.....

When will it explode?

.....

Did you place the bomb? If so, why?

.....

What does it look like?

.....

What is your name?

.....

What kind of bomb is it?

.....

What is your telephone number?

.....

What is your address?

.....

.....

- + **Try dialling 1471. You may get information on where the phone call was made from.**

Did dialling 1471 work?

.....

Time the call ended:

+ **Contact the Police (999) and Premises Duty Holder/ Appropriate Senior Manager**

+ **Carry out further actions based on Police advice.**

What sex did the caller sound?

- Male
- Female

Approximately how old was the caller?

.....

Did the caller have an accent?

.....

Did the caller use a codeword?

.....

Did the caller sound familiar?

.....

What sort of voice did the caller have?

- | | | |
|------------------------------------|--|-------------------------------------|
| <input type="checkbox"/> Normal | <input type="checkbox"/> Well spoken | <input type="checkbox"/> Impediment |
| <input type="checkbox"/> Loud | <input type="checkbox"/> Poorly spoken | <input type="checkbox"/> Stutter |
| <input type="checkbox"/> Quiet | <input type="checkbox"/> Deep | <input type="checkbox"/> Lisp |
| <input type="checkbox"/> Whispered | <input type="checkbox"/> High pitched | <input type="checkbox"/> Slurred |
| <input type="checkbox"/> Clear | <input type="checkbox"/> Hoarse | <input type="checkbox"/> Other |
| <input type="checkbox"/> Disguised | <input type="checkbox"/> Nasal | |

At what pace did the caller speak?

- | | | |
|---------------------------------|--------------------------------|-------------------------------|
| <input type="checkbox"/> Normal | <input type="checkbox"/> Quick | <input type="checkbox"/> Slow |
|---------------------------------|--------------------------------|-------------------------------|

What manner did the caller have?

- | | | |
|-----------------------------------|-------------------------------------|------------------------------------|
| <input type="checkbox"/> Normal | <input type="checkbox"/> Upset | <input type="checkbox"/> Irritated |
| <input type="checkbox"/> Calm | <input type="checkbox"/> Angry | <input type="checkbox"/> Muddled |
| <input type="checkbox"/> Excited | <input type="checkbox"/> Rational | <input type="checkbox"/> Other |
| <input type="checkbox"/> Laughing | <input type="checkbox"/> Irrational | |

Were there any distinguishable background noises?

.....
.....

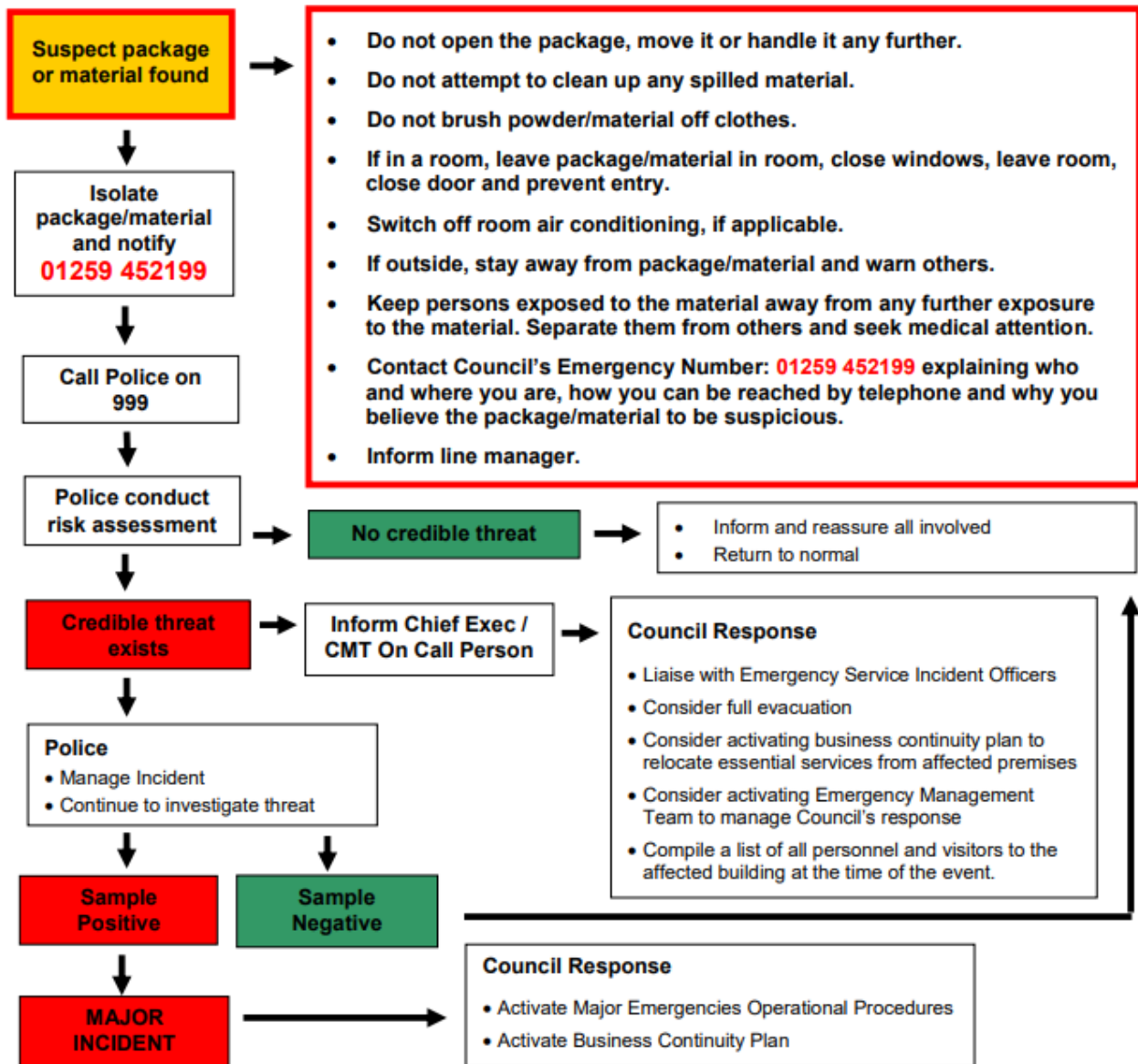
Notes:

.....
.....

Suspect Packages

Signs that might trigger suspicion include:

- Any envelope or package with a suspicious or threatening message written on it or contained inside
- Oily stains, strange odours
- Envelopes that are lopsided, rigid, bulky, discoloured, or feel as though they contain powder
- Unexpected envelopes or packages from foreign countries
- No postage stamp, no franking, no cancellation of the postage stamp, excessive postage
- Incorrect spelling of common names, places or titles
- Handwritten envelopes/packages from an unknown source particularly if addressed to an individual and marked 'personal' or 'addressee only'
- Symptoms (runny nose, streaming eyes, cough, skin irritation) in exposed persons



If you receive a suspicious letter or package What should you do?



- 1** Handle with care
Don't shake or hump
- 2** Isolate and look
for indicators
- 3** Don't Open, Smell
or Taste
- 4** Treat it as Suspect!
Call 999



If parcel is open and/or a threat is identified.....

For a Bomb

Evacuate Immediately

For Radiological

Limit Exposure - Don't Handle
Distance (Evacuate area)
Shield yourself from object

For Biological or Chemical

Isolate - Don't Handle
Wash your hands with soap and warm water

Call **999** (Police)

If safe to do so, call **452199** (Council Emergency Number)

Security Policy

Appendix 2 – Reporting Security Incidents and Suspicious Activity

Once completed send to resilience@clacks.gov.uk

Complete page 1 for all incidents

Complete the relevant section of page 2 and 3 dependent upon incident type

Location	
What building did the incident occur in/at	
What was the specific room or area of the building the incident occurred in	

Reporter	
Name of reporter	
Job Role	
Service	
Contact Phone Number	
Contact Email Address	

Incident Details	
Type of Incident	
Date and Time of Incident	
Were there any injuries – if so complete EVOTIX	
Was there any damage to premises or equipment	
Police informed	
Emergency Services attended	
Police Reference number	
Other emergency Service details	

Security Policy

Please give as much detail on the incident as possible	
--	--

Suspicious Package

Please complete suspicious package

Were Police Notified	
----------------------	--

Was the building evacuated	
----------------------------	--

Have the building been reoccupied	
-----------------------------------	--

Suspicious Activity

What was the nature of the suspicious activity	
--	--

If a suspicious person, please list a description and any other info Please include any logos/insignias or other symbology on clothing/bags etc including tattoos.	
---	--

If a suspicious vehicle please list a description, vehicle registration and any other info	
--	--

Did staff approach the suspicious person/vehicle. If so, provide as much info as possible	
---	--

Please attach any pictures/video or other info if held	
--	--

Bomb Threat

Please complete the bomb threat crib for info received via call

Security Policy

Were police notified	
Was a package found	
Was the building evacuated	
Has the building been reoccupied	

Evacuation/Invacuation

What was the cause of the Evacuation or Invacuation	
Where were personnel moved to	
Where were personnel with additional support needs moved to the same location and if not, where did they move to	
Where were injured personnel moved to	

Intruder/Lockdown

How many intruders were there	
Where did they enter	
Describe the intruders with as much detail as possible Please include any logos/insignias or other symbology on clothing/bags etc including tattoos.	
Was a lockdown initiated	
If there were no intruders confirm why the lockdown was initiated	
Please provide all known information on staff actions in line with Run, Hide, Tell	

Security Policy

Appendix 3 – responsibilities crib sheet

Managers

Responsibility	Tick
All staff have access to the policy either via connect, hard copy, saved to a shared area or a service specific option	
Engaged with premises duty holders of buildings staff work in to support sharing building specific procedures	
Engaged premises duty holder to confirm if any staff need to support security arrangements	
New staff have ID card and have read policy	
Leavers have followed leavers process; ID card has been handed in	
Staff are using their own ID cards and not sharing	
Work staff undertake can be done in compliance with the security policy.	
Risk assessments have been conducted for work and include security considerations	

Premises Duty Holders

Responsibility	Tick
Premises risk assessment includes security considerations	
Security infrastructure is in place i.e. Paxton, CCTV etc.	
A process is in place for staff to report suspicious activity/security incidents in the premises	
Suspicious activity and incidents are reported to Police and Resilience as appropriate	
Property services are engaged for any defects with security infrastructure and supported in resolving issues	
Property services are engaged for new security infrastructure if required	
Property services policies are reviewed for impacts on security	
Emergency plans as per appendix 2 of the Corporate Security policy have been created and are held with in the building	
Staff have been identified to support security response arrangements appropriate to the building in conjunction with managers	
Access control procedures are in place for contractors and visitors	
Signage is in place informing staff of local procedures	
Security procedures specific to the premises are cascaded regularly within the building	
Where necessary ensuring suitable meeting spaces have been identified and given additional measures for the safety of staff and visitors, i.e. Panic Alarms, external visibility to reception staff and internal locking mechanisms supported by external keys to create refuge points. All of these are to be recorded in a premises meeting room procedure	



Equality and Fairer Scotland Impact Assessment (EFSIA) Summary of Assessment

Title: Corporate Security Policy

Key findings from this assessment (or reason why an EFSIA is not required):

The findings of this assessment are that the Corporate Security Policy has a limited impact on protected characteristics and looks to impose a policy that aims to promote the safety and security of all.

Summary of actions taken because of this assessment:

None

Ongoing actions beyond implementation of the proposal include:

None

Lead person(s) for this assessment:

David Webster – Emergency and Resilience Officer

Senior officer approval of assessment:

DATE: 19/02/2026

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

This form should be completed using the guidance contained in the document: ['NAME']. Please read the guidance before completing this form.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

The purpose of the policy is to set out the corporate security arrangements, including the roles and responsibilities of staff, elected members and certain services or individuals within the council. It aims to inform all impacted parties of these measures, roles and responsibilities to enable them to comply.

2. Why is the proposal required?

The proposal is required to ensure appropriate security arrangements are in place across the council estate and to build a robust and accountable security culture within the council.

3. Who is affected by the proposal?

All staff, elected members, visitors, contractors and other third parties attending council buildings.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

Personal Safety Policy 2024

Potentially Violent Persons Database Policy

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

Yes it is a strategic decision.

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- *help you to understand the importance of your proposal for those from equality groups,*
- *inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and*
- *provide justification for the outcome, including where it is agreed an EFSIA is not required.*

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Age	<p>scotland.shinyapps.io/sg-equality-evidence-finder/</p> <p>EIA assessment template</p>	<p>The policy applies equally across all ages. Within the council 51% of staff are aged between 41 and 60 in 2024.</p> <p>In the application of the policy through premises specific procedures consideration needs to be given to ensure no discrimination is made based on age where the following info is relevant:</p> <p>Violent crime most commonly involves offenders under 40 estimated at 80% in 2019/2020</p> <p>Terrorism offences are associated with those between the ages of 21-29 (492 between 2001 and 2024) vs 508 for 30 and over and 234 for 20 and under.</p>
Disability	<p>scotland.shinyapps.io/sg-equality-evidence-finder/</p> <p>EIA assessment template</p>	<p>The policy applies equally across disabled and non disabled people but in the implementation of this policy consideration must be given to disabled staff. The template emergency plan has been written with guidance intended to ensure consideration is given should the most appropriate plan for staff not be suitable for disabled staff.</p> <p>Disabled people are more likely to be a victim of crime estimated at 15% vs 11% for non disabled people in 2019/2020.</p>
Race	<p>scotland.shinyapps.io/sg-equality-evidence-finder/</p> <p>EIA assessment template</p>	<p>The policy applies across all races within the council however it is important to ensure that any associated bias towards certain races is disrupted in the application of the policy and any premises specific procedures:</p> <p>Racial aggravated crimes are the most commonly reported hate crimes in Scotland with 3285 reported in 2020-21 which was a 6% increase vs the previous year. 90% of perpetrators of racist incidents are 'White British'</p> <p>Terrorism is most commonly associated based on Race and Religion with 62% of those convicted of terrorism offences self identifying as Asian however when drilled down beyond this generalisation between 2021 and 2024 64 White British persons were charged</p>

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
		with terrorism offences, the next highest group was Pakistani at 22.
Sex	scotland.shinyapps.io/sq-equality-evidence-finder/ EIA assessment template	<p>The policy applies equally across all staff, with 76% of staff identifying as female.</p> <p>There is no overarching difference between men and women regarding being a victim of a crime though 73% of violent crimes are committed by males, 80% of domestic abuse cases are with a female victim and male offender while 75% of homicide victims are male.</p> <p>There is a more than 10 to 1 ratio between male and female offenders convicted of terrorism.</p>
Gender Reassignment	scotland.shinyapps.io/sq-equality-evidence-finder/ EIA assessment template	<p>The policy applies equally across staff and there is no evidence that it would negatively impact those undergoing or having undergone gender reassignment.</p> <p>It is noted that those undergoing or having undergone gender reassignment may be more prone to hate crimes than others though there is no data available on recorded incidents.</p>
Sexual orientation	scotland.shinyapps.io/sq-equality-evidence-finder/ EIA assessment template	<p>The policy applies equally across all staff regardless of sexual orientation.</p> <p>It is noted that sexual orientation is the second most reported hate crime after race. Offenders of terrorism are at 97% self-identified as heterosexual.</p>
Religion or Belief	scotland.shinyapps.io/sq-equality-evidence-finder/ EIA assessment template	<p>The policy applies equally across all staff regardless of religion or belief. However the application of premises procedures must consider religion in application.</p> <p>Terrorism offenders are generally of a religious background with 161 Muslim, 47 Christian, 8 non-religion and 9 other. National threat assessments highlight that Islamist terrorism is still the main threat to the UK.</p> <p>Religious aggravated charges have lowered by 14% between 2019-2020 and 2020 and 2021 however it remains a main factor for hate crimes</p>
Pregnancy or maternity	scotland.shinyapps.io/sq-equality-evidence-finder/ EIA assessment template	<p>The policy applies equally across all staff regardless of pregnancy or maternity.</p> <p>There is no data on criminal or terrorism impact on pregnancy or maternity</p>

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
<p>Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)</p>	<p>scotland.shinyapps.io/sg-equality-evidence-finder/ EIA assessment template</p>	<p>The policy applies equally to staff. There is again no data to indicate that it negatively impacts anyone with this protected characteristic.</p>
<p>Socio economic disadvantage (if required)</p>	<p>scotland.shinyapps.io/sg-equality-evidence-finder/ EIA assessment template</p>	<p>The policy applies across social economic groups – it is noted that those within deprived areas are more likely to be a victim of a crime, particularly robbery or murder and serious assault. More than half of prison population come from the 20% most deprived areas of Scotland.</p> <p>Clackmannanshire experiences higher-than-average levels of deprivation. A quarter (25%) of all SIMD datazones in the area fall within the 20% most deprived in Scotland. Eight datazones have more than a quarter of residents who are income deprived, and 10% of the population live in the most deprived SIMD areas, ranking Clackmannanshire 9th highest nationally. Only 5% of the population live in the least deprived SIMD areas.</p> <p>It is important to disrupt bias in the application of premises procedures with regards to socio economic disadvantage.</p>

7. **Based on the evidence above, is there relevance to some or all of the equality groups? Y/ N/ unclear**

No

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:

9. Please detail the outcome of any further engagement, consultation and/or research carried out:

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

Age	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Disability	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Race	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Sex	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Gender Reassignment	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Sexual Orientation	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Religion or Belief	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Pregnancy/maternity	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Marriage/civil partnership	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)				

Socio-economic disadvantage	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Yes	No	No impact	
(If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage?				

11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

12. **Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment.** Choose from one of the following:

Please select (X)	Implications for the proposal
	<p>No major change Your assessment demonstrates that the proposal shows no risk of unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
	<p>Adjust the proposal and/or implement mitigations You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.</p>
	<p>Continue the proposal with adverse impact The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.</p>
	<p>Stop the proposal The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

Step E - Discuss and review the assessment with decision-makers

13. **You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment. Record details of these discussions and decisions taken below:**

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. **Record any post-implementation actions required.**

15. **Note here how you intend to monitor the impact of this proposal on equality groups.**

16. **Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:**

Step G – Assessment sign off and approval

Lead person(s) for this assessment:

Signed:

Date:

Senior officer approval of assessment:

Signed:

Date:

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.



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Comhairle Siorrachd
Chlach Mhanann

Additional Employment and Extra Mural Activities Policy

2026



DOCUMENT CONTROL SHEET:

Key Information:

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Author:	Cheryl Dennington
Owner:	Human Resources
Approver:	Council
Approved by and Date:	TBC
Contact:	Human Resources

Revision History:

Version:	Date:	Summary of Changes	Name:	Changes Marked:
<u>1.0</u>	<u>September 2025</u>	<u>Draft</u>	<u>CD</u>	<u>N/A</u>

1. POLICY STATEMENT

- 1.1 Clackmannanshire Council aims to recruit and retain high calibre employees and ensure a commitment to equal opportunities. The Council recognises that on occasion, employees may wish to take on additional employment or voluntary work and this policy is intended to allow employees this flexibility while fulfilling it's obligations in relation to the Working Time Regulations, relevant legislation and Clackmannanshire Council's Code of Conduct for Officers.

2. INTRODUCTION

- 2.1 Employees must not undertake any form of employment additional to their current employment with Clackmannanshire Council which is potentially in conflict or is of such a nature, timing or duration that it may have an adverse effect upon the proper performance of their duties.

3. DEFINITION

- 3.1 Additional employment relates to any paid or unpaid employment undertaken by an employee which is additional to their substantive post with Clackmannanshire Council, including self employment and employment elsewhere within or out with the Council. It is noted that an employee's substantive post may be with another organisation and that their employment with the Council may be secondary.
- 3.2 This policy also relates to extra-mural activities not regarded as employment but only where such activities may conflict with the proper performance of an employee's duties. This is not intended to refer to ad hoc charitable or voluntary work but rather where an individual is an officeholder with a charitable/ voluntary organisation, Parent Council, or other similar body and their extra-mural role has the potential to conflict with their Council employment. For example, a conflict may occur where an employee is involved in issuing grants on behalf of Clackmannanshire Council and also holds a position such as Treasurer or Secretary of a voluntary group applying for financial assistance from the Council. It is not the intention of the policy to prevent employees from undertaking such extra-mural activities but simply to identify the need for such activities to be discussed with the relevant line manager to avoid any conflict of interest arising.
- 3.3 The carrying out of public duties should also be considered as part of this policy. Examples include a local councillor, a member of the Environment Agency or the Scottish Environment Protection agency and a member of any statutory tribunal (for example an employment tribunal).
- 3.4 Employees will only be permitted to engage in other employment or business activity provided that it does not interfere with, or adversely affect either the Council's interests or the employees' ability to meet contractual requirements and does not breach any

statutory obligation (e.g. Working Time Regulations). Any additional employment or business requires the prior written consent of an employee's line manager.

4. PURPOSE

4.1 The purpose of this policy is to:

- Set clear expectations for employees considering additional employment and/or extra mural activities.
- Prevent conflicts of interest or situations that could impact on the Council's reputation.
- Ensure employees' health and well-being is maintained by managing workloads effectively.
- Provide a formal process for seeking approval and managing additional employment and extra mural activities.

5. SCOPE AND RESPONSIBILITY

5.1 This policy applies to all employees of Clackmannanshire Council.

5.1.1 Teachers are excluded when undertaking work involved with the Scottish Qualification Authority i.e. setter, examiner, marker. In all other circumstances the provisions of this policy applies to teachers.

6. PROCESSING OF PERSONAL DATA

6.1.1 The Council processes personal data collected as part of this procedure in accordance with its data protection policy. In particular, data collected as part of this process is held securely and accessed by, and disclosed to, individuals only for the purposes necessary to action and manage this procedure.

7. MONITORING AND REVIEW

7.1.1 HR shall monitor the effectiveness of these procedures on an ongoing basis. Amendments will be made as and when deemed necessary and, where appropriate, after consultation with recognised trade unions.

8. EQUALITY IMPACT ASSESSMENT

Policy Name	Additional Employment & Extra Mural Activities
Department	HR & WFD
Policy Lead	HR & WFD
Equality Impact Assessment	
Full EQIA required	Yes <input checked="" type="checkbox"/> No* <input type="checkbox"/>
* In no please provide rationale	
Date Full EQIA complete	
Date Approved	
Review Date	





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Comhairle Siorrachd
Chlach Mhanann

Additional Employment and Extra Mural Activities Procedure

2026



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Owner:	Human Resources
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Approved by and Date:	TBC
Contact:	Human Resources

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<u>1.0</u>	<u>September 2025</u>	<u>Draft</u>	<u>CD</u>	<u>N/A</u>

1. INTRODUCTION

- 1.1 This document outlines the procedure in relation to the steps that employees must follow when seeking approval for additional employment and/or extra mural activities and how the Council will assess and manage these requests.
- 1.2 It should be read alongside the Council's Additional Employment and Extra Mural Activities Policy.

2. GENERAL PRINCIPLES

- 2.1 Any additional employment and/or extra mural activities should not affect the employee's ability to perform their primary duties or disrupt Council operations.
- 2.2 Employees should not put their physical or mental well-being at risk due to overwork.
- 2.3 Additional employment or extra mural activities should not create any situation where personal interests could conflict with the interests of Clackmannanshire Council.
- 2.4 Employees must not use Council resources or facilities for additional employment or extra mural activities.
- 2.5 Employees must ensure compliance with all applicable legal requirements related to additional employment and/or extra mural activities. Additionally, any additional employment or activities should be in line with the principles and code outlined in the National Code of Conduct for local government employees in Scotland (<http://connect/working-for-us/staff-conduct/1-13-national-code-of-conduct.html>).

3. DECLARING ADDITIONAL EMPLOYMENT AND OR/EXTRA MURAL ACTIVITIES

- 3.1.1 Any employee, who is considering undertaking additional employment and/or extra mural activities, starting up a business or becoming an officeholder of a charity or other similar body, must discuss this in advance with their line manager to explore the potential for any conflict of interest to arise and complete a Record of Additional Employment/Extra Mural Activities form (Appendix 1).

- 3.1.2 Equally, any employee currently undertaking such extra-mural employment or activities, which have not been notified to their line manager, must complete this form and discuss the impact of this upon their substantive post with their line manager immediately.

4. IDENTIFYING POTENTIAL CONFLICTS OF INTEREST

- 4.1 If an employee is considering or is currently undertaking additional employment/extra mural activities, the employee's line manager should consider the potential for any conflicts of interest to arise in consultation with the employee concerned.
- 4.2 Where no conflict of interest is identified this should be recorded as detailed in Section 9.
- 4.3 When recruiting individuals already employed by Clackmannanshire Council it should be established at interview stage whether the employee intends to retain their current post if successful in their application. If an employee intends to retain their current post then a discussion will need to take place as to whether/how this may impact on their existing post and a Record of Additional Employment/Extra Mural Activities form should be completed to reflect this discussion and record any limitations required.
- 4.4 Where a potential conflict of interest is identified, this must be recorded, as detailed in Section 9 and the decision as to whether this is approved or not would lie with the Service Senior Manager in consultation with Human Resources and Legal where appropriate.

5. AREAS TO BE CONSIDERED

- 5.1 Areas to consider when determining whether a conflict of interest is likely to arise, include:

- **Hours of Work**

Consideration requires to be given generally to whether the hours involved in the employment/activities, in terms of their frequency and timing are liable to affect an employee's capacity at work.

Clackmannanshire Council has a responsibility under the Working Time Regulations (WTR) to ensure that employees receive appropriate rest breaks, daily rest periods, and weekly rest periods. Clackmannanshire Council also has a responsibility to ensure that employees do not exceed the maximum weekly working hours of 48 hours in any 7-day period averaged over 52 weeks.

Consideration should therefore be given to the employee's working hours arrangements in the other employment and also to the potential impact of those commitments on their Council duties. This also needs to be assessed against the WTR to ensure adequate rest periods are available and the additional time does not contravene any of the regulations. See Appendix 2 for further guidance on the WTR.

- **External Contractors**

If an employee involved in the award of contracts has or is likely to have a business relationship out with their Council duties with existing or potential external contractors, this may be perceived as a conflict of interest. Advice in this regard may be sought from the Council's Monitoring Officer, who is based within legal services.

- **Dealings with the Council**

Consideration should also be given to whether the employee is likely to have dealings with the Council in the course of their additional employment and/or extra-mural activities. For example, could the employee or their other employer gain financially or otherwise through decisions or actions taken by the employee in the course of Council employ or as a result of their knowledge of confidential Council matters?

- **General Impact**

Consideration requires to be given more generally to whether the additional employment or extra mural activities concerned is likely to detrimentally impact on public confidence in the Council.

6. WHERE NO CONFLICT IS IDENTIFIED

- 6.1 Where no conflict of interest is identified, the employee's line manager should confirm their knowledge of the employee's additional employment/extra mural activities by ensuring that a Record of Additional Employment/Extra Mural Activities form (Appendix 1) is completed and this information is recorded as described in Section 9.
- 6.2 Thereafter, it is the responsibility of the employee concerned to advise their line manager of any change in circumstances relating to their additional employment/extra mural activities. The line manager should however, review this on a regular basis, at least annually.

7. WHERE A POTENTIAL CONFLICT OF INTEREST IS IDENTIFIED

- 7.1 Where the potential for a conflict of interest to arise is identified, the line manager should discuss this with the employee, taking into consideration the details provided in the Record of Additional Employment/Extra Mural Activities form, to consider methods of preventing such a conflict arising.

For example:

- Limiting the hours worked in the additional employment/activities;
- Taking advice if there is to be a business relationship with the Council in the additional employment;
- Ensuring that the employee or their other employer does not gain financially or otherwise through decisions or actions taken by the employee in the course of their Council employment or because of his/her knowledge of confidential Council matters.
- This list is not exhaustive.

- 7.2 The Record of Additional Employment/Extra Mural Activities form, as attached at Appendix 1, should be completed, indicating areas of concern and any mechanisms proposed to prevent a conflict of interest arising, and sent to the relevant Senior Manager for consideration.

The Senior Manager, in consultation with Human Resources and Legal, will either:

- (a) Approve the additional employment/extra mural activities on the basis of information provided;
- (b) Approve the additional employment/extra mural activities with some specified limitations in order to prevent a conflict of interests arising; or
- (c) Where a clear conflict of interest exists, refuse consent for the employee to undertake the additional employment/extra mural activities detailed whilst maintaining their Council employment. In such circumstances, the employee concerned should be made aware that undertaking such additional employment/extra mural activities could lead to disciplinary action being taken against them under the Council's Disciplinary Policy & Code of Practice. Further advice in this regard is available from Human Resources.

- 7.3 If an employee disagrees with the decision to refuse consent for additional employment and/or extra mural activities then they should be informed of their right of appeal.

8. APPEALS PROCESS

- 8.1 Wherever possible it is better to reach agreement on additional employment and/or extra mural activities within the workplace. However, if consent is refused the following appeal process should be followed. Firstly, hold an informal discussion wherever possible - there may be some simple misunderstanding which can be resolved in an informal way.
- 8.2 If the member of staff still wishes to appeal against a manager's decision they must do so within 10 working days of being notified of the refusal.
- 8.3 The appeal should be in writing and outline the grounds for making the appeal and submitted to the Senior Manager - HR.
- 8.4 An appeal meeting will be organised with the relevant Senior Manager within 10 working days of receipt of the appeal. Normal working practices will continue until the appeal is concluded. If the meeting is delayed for any reason (for example annual leave) this will be clearly communicated to the employee and a date set.
- 8.5 If the Senior Manager has been previously involved in the decision made, an independent Strategic Director should hold the meeting to review the business rationale provided to ensure fairness and transparency.
- 8.6 If the appeal is upheld, the Senior Manager will liaise with the original decision maker and confirm what has been agreed and the review date.
- 8.7 There is no further right of appeal.

9. RECORDING

- 9.1 In order to assist managers in the systematic review of all declared additional employment and/or extra mural activities undertaken by employees within their section/service, details of such activities should be recorded on Itrent, the Council's management information system. This information should be reviewed and maintained by the individual's line manager.
- 9.2 The record of the additional employment/extra mural activities should contain:
 - (a) The nature of the extra-mural employment/activities being undertaken
 - (b) The name of any external employer/organisation
 - (c) Average hours worked and the timing of such hours

- (d) Whether employment is temporary and if so, the duration of such employment
- (e) Any comments recorded by line manager following meeting with employee
- (f) Any conditions/limitations agreed with employee in relation to their extra-mural employment/activities
- (g) Review date where applicable.

10. REVIEWING ADDITIONAL EMPLOYMENT/EXTRA MURAL ACTIVITIES

- 10.1 The appropriate Manager should arrange to meet with the employee concerned by the agreed review date to consider whether the circumstances surrounding their additional employment/extra mural activities have altered and to ensure, where applicable, that any condition(s) placed upon such activities are being adhered to.
- 10.2 If at this stage, or at any point during the employee's employment, it becomes apparent that an employee's additional employment and/or extra mural activities are having an adverse effect upon the performance of their Council duties or have resulted in a conflict of interest arising, this matter should be reviewed initially by their line manager in discussion with the employee concerned.
- 10.3 Equally, if any limitations or conditions were in place and are not being adhered to, or other such issues have arisen, the Council will in such circumstances have the right to withdraw approval for the additional employment and/or extra mural activities with immediate effect and disciplinary action may be taken against the employee concerned in accordance with the Council's Disciplinary Policy & Code of Practice.

11. CASUAL EMPLOYMENT

- 11.1 Whilst it is not intended that this formal procedure be applied to individuals employed on a casual basis by Clackmannanshire Council, managers should be aware of other employment undertaken by casual employees and should refrain from employing individuals on a casual basis in areas, or undertaking duties, where a potential conflict of interest may arise.

12. MONITORING AND REVIEW

- 12.1.1 Strategic Directors/Senior Managers are responsible for monitoring the progress of cases within their service area, on an ongoing basis, to ensure that the timescales contained in this policy are adhered to.
- 12.1.2 Both HR and Trade Union Representatives shall monitor the effectiveness of the procedure on an ongoing basis. Changes may result from employee, management

and union feedback and/or from changes in employment legislation. Revisions and updates will be implemented by the Council following consultation with recognised Trade Unions.

13. EQUALITY IMPACT ASSESSMENT

Policy Name	Additional Employment and Extra Mural Activities Procedure
Department	HR&WFD
Policy Lead	HR*WFD
Equality Impact Assessment	
Full EQIA required	Yes <input checked="" type="checkbox"/> No* <input type="checkbox"/>
* In no please provide rationale	
Date Full EQIA complete	
Date Approved	
Review Date	





Equality and Fairer Scotland Impact Assessment (EFSIA) Summary of Assessment

Title:

Additional Employment and Extra Mural Activities Policy and Procedure

Key findings from this assessment (or reason why an EFSIA is not required):

Summary of actions taken because of this assessment:

Ongoing actions beyond implementation of the proposal include:

Equality and Diversity e-learning remains part of the Council's annual mandatory learning programme. Delivery of the mandatory training programme is monitored by the Senior Leadership Group.

Lead person(s) for this assessment:

Cheryl Dennington, HR Business Partner

Senior officer approval of assessment:

DATE:

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

This form should be completed using the guidance contained in the document: ['NAME']. Please read the guidance before completing this form.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

To set a fair and transparent process for requesting and managing additional employment and extra mural activities (paid or unpaid), including approval criteria, conflicts of interests and working time/rest safeguards.

2. Why is the proposal required?

Governs approval/management of additional employment and extra mural activities.

3. Who is affected by the proposal?

Applies to all employees of Clackmannanshire Council.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

Recruitment & Selection and Casual Workers.

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

N/A

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- help you to understand the importance of your proposal for those from equality groups,
- inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and
- provide justification for the outcome, including where it is agreed an EFSIA is not required.

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Age		<p>It is possible that certain age groups are more likely, on balance, to hold additional employment or activities.</p> <p>In Clackmannanshire Council, the highest age band of those with more than one role, including casual positions, was ages 31-40 – 138 employees in total (5.17% of total workforce) of which 128 were female (92.57%) and 10 were male (7.25%). This was closely followed by age band 41-50 – 137 employees in total (5.13% of total workforce) of which 126 were female (91.97%) and 11 were male (8.03%).</p> <p>Overall, the 31-40 age group was 23.87% of the total workforce, in addition to age group 41-50 which was 24.21% of the total workforce which equates to around 47.98% - almost half of the Council's workforce. The majority of those with more than one position, including casual position(s) in these age groups, were female.</p> <p>Source: Business Objects report based on information from Clackmannanshire Council's itrent system at 31st March 2025.</p> <p>Overall, this policy could have a positive impact on any employee wishing to take on additional employment or activities as it provides both clarity and a structure to support people with two or more jobs.</p> <p>There is no evidence to suggest that the application of the policy itself, could adversely affect employees on the grounds of their age.</p>
Disability		<p>All employees are required to declare any additional employment/activities. There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of disability.</p> <p>Additional employment or activities may exacerbate health conditions or clash with reasonable adjustments however these could be reviewed and occupational health</p>

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
		input can be requested when exploring supportive alternatives.
Race		This protected characteristic is not directly relevant to this procedure, and it is not anticipated that there could be any differential impact on people on the grounds of race.
Sex		<p>A higher proportion of women worked part-time compared to men in Scotland (38.6% compared to 12.9%).</p> <p>https://www.gov.scot/publications/scotlands-labour-market-insights-july-2024/pages/people-in-work/</p> <p>In March 2025, Clackmannanshire Council’s workforce consisted of 1015 part time employees, which equates to 38.04% of the total workforce. 69 (6.80%) were male, and 946 were female (93.20%).</p> <p>This procedure will apply to all employees who are seeking to take up additional employment, irrespective of their contracted working hours.</p> <p>Source: Business Objects report based on information from Clackmannanshire Council’s itrent system at 31st March 2025.</p> <p>The majority of the 2.9 million lone-parent families in 2022 were headed by a lone mother (2.5 million, 84%), with lone fathers now accounting for 16% (457,000) of lone-parent families.</p> <p>https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2022</p> <p>Around three-quarters of carers in the 2023-24 Carers Census were female (73%), similar to last year. Female carers outweigh male carers in all age groups, with the most pronounced difference being seen in the working age carer group – where 80% of carers aged between 18 and 64 were female.</p> <p>https://www.gov.scot/publications/carers-census-scotland-2023-24/</p> <p>This procedure is intended to ensure fair treatment for all employees, irrelevant of sex.</p>
Gender Reassignment		This protected characteristic is not directly relevant to this procedure, and it is not anticipated that there could be any differential impact on people on the grounds of gender reassignment.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Sexual orientation		This protected characteristic is not directly relevant to this procedure, and it is not anticipated that there could be any differential impact on people on the grounds of sexual orientation.
Religion or Belief		This protected characteristic is not directly relevant to this procedure, and it is not anticipated that there could be any differential impact on people on the grounds of religion or belief.
Pregnancy or maternity		This protected characteristic is not directly relevant to this procedure, and it is not anticipated that there could be any differential impact on people on the grounds of pregnancy or maternity.
Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)		This protected characteristic is not directly relevant to this procedure, and it is not anticipated that there could be any differential impact on people on the grounds of marriage or civil partnership.
Socio economic disadvantage (if required)		N/A

7. **Based on the evidence above, is there relevance to some or all of the equality groups? N**

If yes or unclear, proceed to further steps and complete full EFSIA

If no, explain why below and then proceed to Step E:

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

- 8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:**

The procedure has been developed in consultation with recognised trade unions, along with elected manager representatives, all who will be involved in the review of the draft procedure at policy group.

- 9. Please detail the outcome of any further engagement, consultation and/or research carried out:**

N/A

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

Age	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations	X			
potential to advance equality of opportunity			X	

Disability	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations	X			
potential to advance equality of opportunity			X	

Race	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Sex	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations	X			
potential to advance equality of opportunity			X	

Gender Reassignment	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Sexual Orientation	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Religion or Belief	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Pregnancy/maternity	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Marriage/civil partnership	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)			X	

Socio-economic disadvantage	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Yes	No	No impact	
(If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage?			X	

11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

12. **Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment.** Choose from one of the following:

Please select (X)	Implications for the proposal
X	<p>No major change Your assessment demonstrates that the proposal shows no risk of unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
	<p>Adjust the proposal and/or implement mitigations You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.</p>
	<p>Continue the proposal with adverse impact The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.</p>
	<p>Stop the proposal The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

Step E - Discuss and review the assessment with decision-makers

13. **You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment. Record details of these discussions and decisions taken below:**

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. **Record any post-implementation actions required.**

15. **Note here how you intend to monitor the impact of this proposal on equality groups.**

16. **Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:**

Step G – Assessment sign off and approval

Lead person(s) for this assessment:

Signed:

Date:

Senior officer approval of assessment:

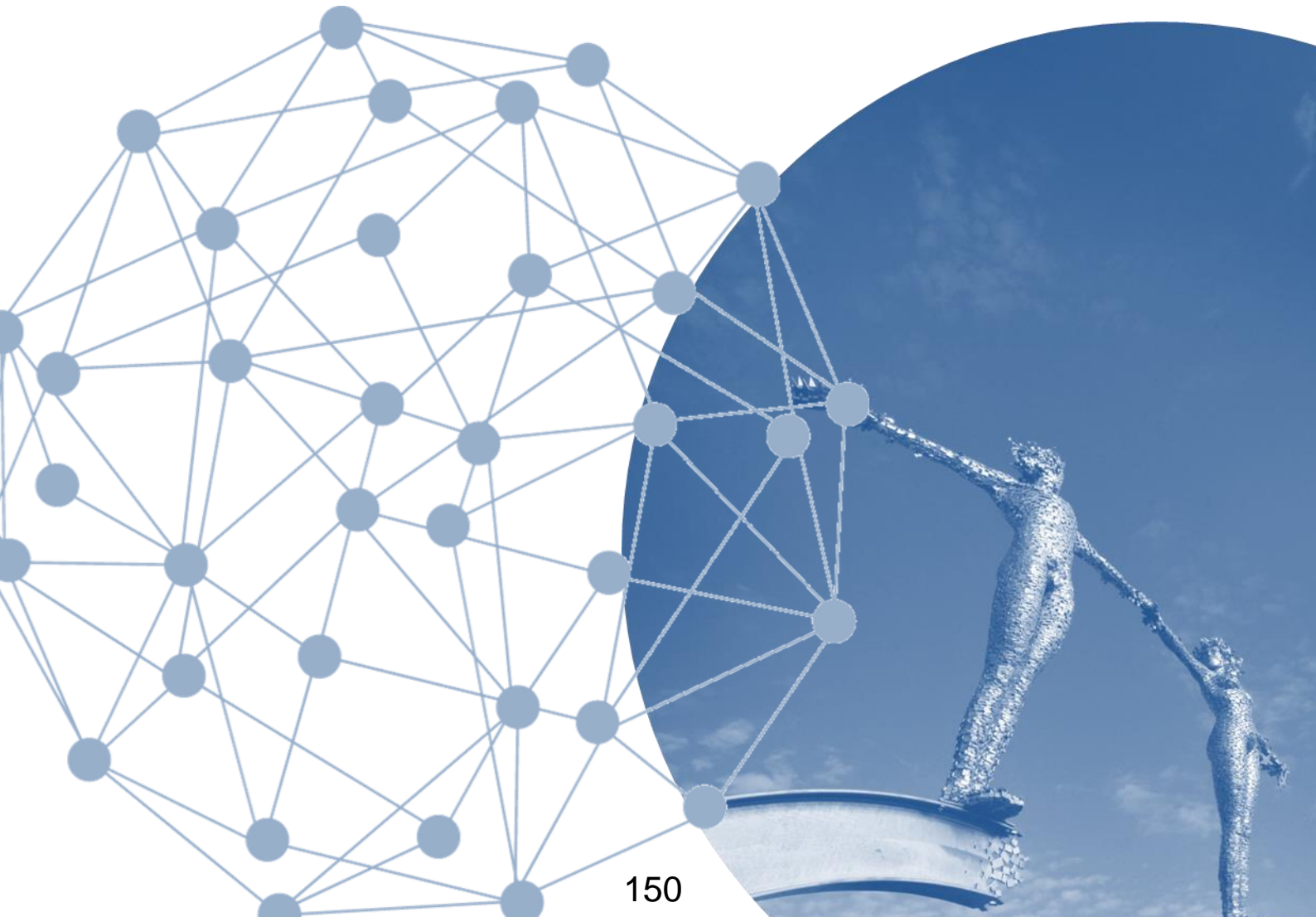
Signed:

Date:

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.



**SMOKING POLICY
2026**



DOCUMENT CONTROL SHEET:

Key Information:

Title:	Smoking Policy
Date Issued:	<u>23 April 2026</u>
Date Effective From:	<u>On approval by Council</u>
Version Number:	2.1
Document Type:	Policy
Document Status:	Draft
Author:	Seonaid Scott
Owner:	Health & Safety Manager
Approver:	Council
Approved by and Date:	
Contact:	<u>Health and Safety</u>

Revision History:

Version:	Date:	Summary of Changes	Name:	Changes Marked:
1.1	08/01/20	Changes in line with HWL requirements	OO	
2.0	08/12/21	Changes in line with HWL requirements	SS	
2.1	Aug 2025	Minor updates	PM	

1. General Introduction

- 1.1. “The Prohibition of Smoking in Certain Premises (Scotland) Regulations 2006” has been in place for over many years now but smoking has long been recognised as the biggest single cause of serious ill health and premature death in Scotland. Similarly, the effect of people breathing in other people’s tobacco smoke, i.e. passive smoking, is an important health concern.
- 1.2. Although substantial achievements have been made in reducing the smoking rate in Scotland, smoking remains a major influence on Scotland's health. Great progress has been made in tackling the health inequalities caused by tobacco and it is becoming unfashionable to smoke. As such the Council encourages its staff to quit smoking entirely and for those not able to do so to reduce significantly the amount they smoke. For the purposes of this policy the Council treats all nicotine delivery devices which create vapour or fumes (including e-cigarettes), in the same way as cigarettes.
- 1.3. The Council recognises its role in promoting and exemplifying Scotland’s smoke free ambitions as recommended by the Scottish Governments “Creating a Tobacco-Free Generation – A Tobacco Control Strategy for Scotland” and the NHS/COSLA Smoke-free local authority implementation guidance.

2. Policy statement

- 2.1. Clackmannanshire Council is committed to maintaining the health and safety of its employees and all those affected by its activities. The Council recognises the health risks associated with smoking and is committed to a smoke-free working environment.
- 2.2. The purpose of the Council’s smoke free policy is to:
 - a) Comply with the Smoking, Health and Social Care (Scotland) Act 2005 and The Prohibition of Smoking in Certain Premises (Scotland) Regulations 2006. This will also support the Council in complying with the Health & Safety at Work Act 1974 and the Safety & Health of Pregnant Workers Directive (92/85/EEC).

- b) Support the 2013 Scottish Government recommendations that Local Authorities consider scope for extending smoking restrictions to outdoor areas within their jurisdiction (including smoking in vehicles parked on the grounds of Council property)
- c) Support the Scottish Governments Tobacco Control Strategy: Raising Scotland's Tobacco-free Generation: our tobacco control action plan 2018 (<https://www.gov.scot/publications/raising-scotlands-tobacco-free-generation-tobacco-control-action-plan-2018/>).
- d) Reduce the risks associated with passive smoking by prohibiting smoking in all Council owned premises and designated outdoor areas within their jurisdiction. This includes all doorways and entrances to Council premises.
- e) Prohibit smoking in any Council owned or hired fleet vehicle and,
- f) Whilst private cars are exempt under legislation, smoking shall not be permitted in leased cars during authorised journeys on Council business

2.3. This policy applies to all employees and Elected Members of Clackmannanshire Council. It also applies to all consultants, contractors or other third parties employed or engaged by or on behalf of Clackmannanshire Council as well as visitors and members of the public accessing Council premises.

3. Smoke free council premises

- 3.1. Smoking is prohibited in all Clackmannanshire Council's premises and surrounding grounds. Public car parks to which staffs have access are not included. Private car parks to which the public do not have a general right of access will only be included where prohibiting smoking supports wider policy aims such as in schools or nurseries.
- 3.2. The only exemption to this is a designated smoking room for residents use only in adult care homes. This room will be subject to a risk assessment to prevent passive smoking and minimise risks to residents.
- 3.3. Smoking is prohibited in Council owned or leased vehicles and privately owned vehicles while being used for Council business. Employees can smoke in their privately owned vehicle being used for Council business, as long as they aren't carrying passengers. Council employees should be completely outside of the vehicle should they need to smoke. Smokers

should ensure that smoke does not enter the vehicle or can be inhaled by anyone who is using or who is currently situated in that vehicle.

3.4. Employees found smoking in contravention of this policy will be referred to the line manager who will deal with the breach in line with the Council's Disciplinary Policy and Procedures.

4. Smoking during working hours

4.1. Employees who wish to smoke may do so in their own breaks such as lunch breaks or where agreed, official mid-morning or mid-afternoon breaks. Employees are not permitted to smoke whilst at work under any other circumstances although it is recognised that employees may wish to smoke whilst travelling between Council sites. Employees wishing to do so should ensure they are familiar with Section 3 of this policy. The Council would encourage employees wherever possible to consider their personal health on these occasions.

4.2. The practice of taking time away from work specifically to smoke is not permitted.

4.3. The sale of tobacco is prohibited in all Clackmannanshire Council premises.

4.4. The policy applies equally to 'lit tobacco' products as well as Vapour producing instruments (often referred to as e-cigs) or any other nicotine based machines that produce vapour or fumes.

5. Policy for third party premises

5.1. Clackmannanshire Council has a duty of care to protect its employees but cannot control the smoking policy on third party premises. The Council will ask the Service User to arrange for a non-smoking area to be provided for the duration of the visit. Where this is not possible, the Council will ask the Service User to refrain from smoking during the duration of the visit.

5.2. In circumstances where it is not possible to arrange a smoke free visit, employees should seek advice from their line manager, who should take all reasonable steps to protect them from exposure to second hand smoke. Examples of reasonable steps may include but not limited to: arranging an alternative smoke-free location, requesting that the individual refrains from

smoking for the duration of the visit and opens the windows or ensures ventilation, holding the meeting remotely.

6. Visitors to Council Premises

- 6.1. Visitors not adhering to the policy will be asked to comply or leave the premises or site. If the person who sees the visitor smoking does not feel able to deal with it, they should report the matter to the person the visitor came to see. In the case of a contractor, the matter should be reported to the Contract Responsible Officer for the work.
- 6.2. If a visitor regularly fails to comply with the policy the matter should be reported to the Premises Duty Holder for further action. This may include writing to the visitor and/or banning them from site.

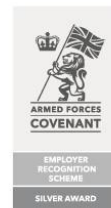
7. Support for those who smoke

- 7.1. Staff members who wish to stop smoking should discuss their programme with their line managers to identify any reasonable support that the Council can provide.
- 7.2. In addition to Council run health promotion events free smoking cessation advice and local support groups can be gained by contacting:
 - The NHS smoking helpline 0800 169 0 169 between 7am and 11pm Monday to Sunday to speak to an experienced advisor
 - Visit PAM Wellness
 - QuitYourWay Scotland helpline: 0800 84 84 84 between 8am to 10pm 7 days a week. You can chat online with a Quit Your Way Scotland advisor. Webchat is open Monday to Friday 9am to 5pm, if an adviser is available. You can text 'Quit Your Way' and your question to 07903 588 669. You must include a question in your text. The SMS text service is monitored between 9am to 4.30pm. If you send a text outside of these times, you'll receive a reply the next working day.
 - visit NHS Inform for information on [Stopping Smoking](#)
 - From GPs or practice nurses
 - Clackmannanshire Community Health Centre

- Local pharmacies
- Request a quit pack <https://www.nhsinform.scot/healthy-living/stopping-smoking/help-to-stop/request-a-quit-pack>

7.3. If any employees have any concerns with any part of this policy, they should raise it with their line manager in the first instance. Further escalation of concerns should occur in line with the Council’s Health and Safety or Grievance Policies depending on the nature of the concern.

Policy Name	Smoking Policy	
Department	Partnership & Performance	
Policy Lead	H&S Manager	
Equality Impact Assessment		
Full EQIA required	Yes <input type="checkbox"/>	No* <input checked="" type="checkbox"/>
* In no please provide rationale Policy has been assessed and applies equally to all Council employees and does not negatively impact on any group which falls within any of the 9 protected characteristics		
Date Full EQAI complete	N/A	
Date Approved		
Review Date		





Equality and Fairer Scotland Impact Assessment (EFSIA) Summary of Assessment

Title: Smoking Policy

Key findings from this assessment (or reason why an EFSIA is not required):

The Smoking Policy applies equally to all groups and supports positive ill health outcomes across all groups by prohibiting smoking (including e-cigarettes and nicotine-delivering devices) in Council premises, vehicles and designated outdoor areas, in line with the Smoking Premises (Scotland) Regulations 2006. No adverse impacts have been identified for any protected characteristic.

Summary of actions taken because of this assessment:

1. Review the evidence available on smoking prevalence (the Scottish Health Survey 2022).
2. Consultation with the Council's Policy Group.

Ongoing actions beyond implementation of the proposal include:

1. Monitoring to ensure policy is applied consistently across the Council.
2. Ongoing review and consultation of the Policy.
3. Healthy Working Lives to support promoting health campaigns.
4. Support via signposting to cessation services, etc.

Lead person(s) for this assessment:

Health & Safety Team (Partnership & Performance)

Senior officer approval of assessment:

Strategic Director (Partnership & Performance)

DATE: 12/09/25

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

This form should be completed using the guidance contained in the document: ['NAME']. Please read the guidance before completing this form.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

The Smoking Policy aims to protect the health of employees, elected members, visitors, contractors, and the public by prohibiting smoking, including e-cigarettes and other nicotine-delivering devices in Council premises, vehicles or designated outdoor areas, in line with the Smoking, Health and Social Care Regulations 2006. This will also support the Council in complying with the Health and Safety at Work etc. Act 1974 and the Safety & Health of Pregnant Workers Directive (92/85/EEC).

2. Why is the proposal required?

To protect health and support national public health goals in reducing smoking prevalence.

3. Who is affected by the proposal?

Employees, elected members, visitors, contractors and public who access Council premises.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

Health and Safety and HR Policies (employee conduct, employee mental health & wellbeing).

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

Yes – it goes to Executive Health & Safety Committee for approval, and directly supports on protecting the health of employees, elected members, visitors, contractors, and the public.

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- *help you to understand the importance of your proposal for those from equality groups,*
- *inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and*

- provide justification for the outcome, including where it is agreed an EFSIA is not required.

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Age	Scottish Health Survey 2022	<p>According to Scottish Health Survey 2022, in 2022, smoking was most prevalent for those aged 45-54, and least prevalent for those aged 75 and over. The use of Nicotine Vapour Products (NVPs) was most prevalent among those aged 16-24. 15% of adults aged 16-24 reported that they currently used NVPs and usage was lowest among those aged 75 and older: 1% reported that they currently use NVPs. 4% of all adults reported using both NVPs and cigarettes, while 5% reported current use of NVPs and previous use of cigarettes. Use of NVPs tended to decrease with age, with dual use of NVPs and cigarettes and use of NVPs with no history of smoking highest among those aged 16-24 (7% and 3% respectively) and lowest among those aged 75 and older (<1% and 0% respectively).</p> <p>Smoking impacts all age groups, but application of the policy is consistent regardless of age.</p>
Disability	N/A	No evidence of impact.
Race	N/A	No evidence of impact.
Sex	Scottish Health Survey 2022	<p>According to Scottish Health Survey 2022, significantly more men (18%) than women (13%) reported that they were currently smokers. A higher proportion of men than women had never tried to stop smoking in 2021/2022 combined (28% men; 16% women), while a lower proportion of men than women had tried to stop smoking three times or more (37% and 49% respectively).</p> <p>Smoking prevalence is slightly higher among men, but policy applies equally.</p>
Gender Reassignment	N/A	No evidence of impact.
Sexual orientation	N/A	No evidence of impact.
Religion or Belief	N/A	No evidence of impact.
Pregnancy or maternity		The policy protects pregnant employees from second-hand smoke and aligns with the Safety & Health of Pregnant Workers Directive (92/85/EEC).

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)	N/A	No evidence of impact.
Socio economic disadvantage (if required)	Scottish Health Survey 2022	<p>In 2022, the age-standardised prevalence of current cigarette smoking remained highest among adults living in the most deprived areas (25%), and lowest among those living in the least deprived areas (7%). This continued the trend observed since 2003, when smoking prevalence was 45% in most deprived areas and 17% in least deprived areas.</p> <p>In 2022, the age-standardised mean number of cigarettes smoked per day was highest among adults living in the most deprived areas (13.0 per day) and lowest among those living in least deprived areas (10.0). This pattern has been evident across the timeseries.</p> <p>The Smoking Policy is consistent in its approach. Cessation support will help reducing illness and improve quality of life.</p>

7. Based on the evidence above, is there relevance to some or all of the equality groups? Y/ N/ unclear

No

If yes or unclear, proceed to further steps and complete full EFSIA

If no, explain why below and then proceed to Step E:

Age, Sex and Socio-economic data show variation, however the policy applies equally to all with the purpose of improving health. There are no evidence findings to suggest that any protected group will be impacted more than others.

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:

N/A

9. Please detail the outcome of any further engagement, consultation and/or research carried out:

N/A

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

Age	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Disability	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Race	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Sex	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Gender Reassignment	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Sexual Orientation	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Religion or Belief	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Pregnancy/maternity	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Marriage/civil partnership	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)				

Socio-economic disadvantage	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Yes	No	No impact	
(If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage?				

11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

12. **Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment.** Choose from one of the following:

Please select (X)	Implications for the proposal
X	<p>No major change Your assessment demonstrates that the proposal shows no risk of unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
	<p>Adjust the proposal and/or implement mitigations You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.</p>
	<p>Continue the proposal with adverse impact The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.</p>
	<p>Stop the proposal The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

Step E - Discuss and review the assessment with decision-makers

13. **You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment. Record details of these discussions and decisions taken below:**

The Smoking Policy has been developed in consultation with recognised trade unions, who, along with the Council Management, form the Council's Policy Group. In addition, the policy will be considered by, and approved by, the Councils Executive Health and Safety Committee.

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. **Record any post-implementation actions required.**

15. **Note here how you intend to monitor the impact of this proposal on equality groups.**

16. **Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:**

Step G – Assessment sign off and approval

Lead person(s) for this assessment:

Signed: Paulina Malczewska

Date: 12/09/2025

Senior officer approval of assessment:

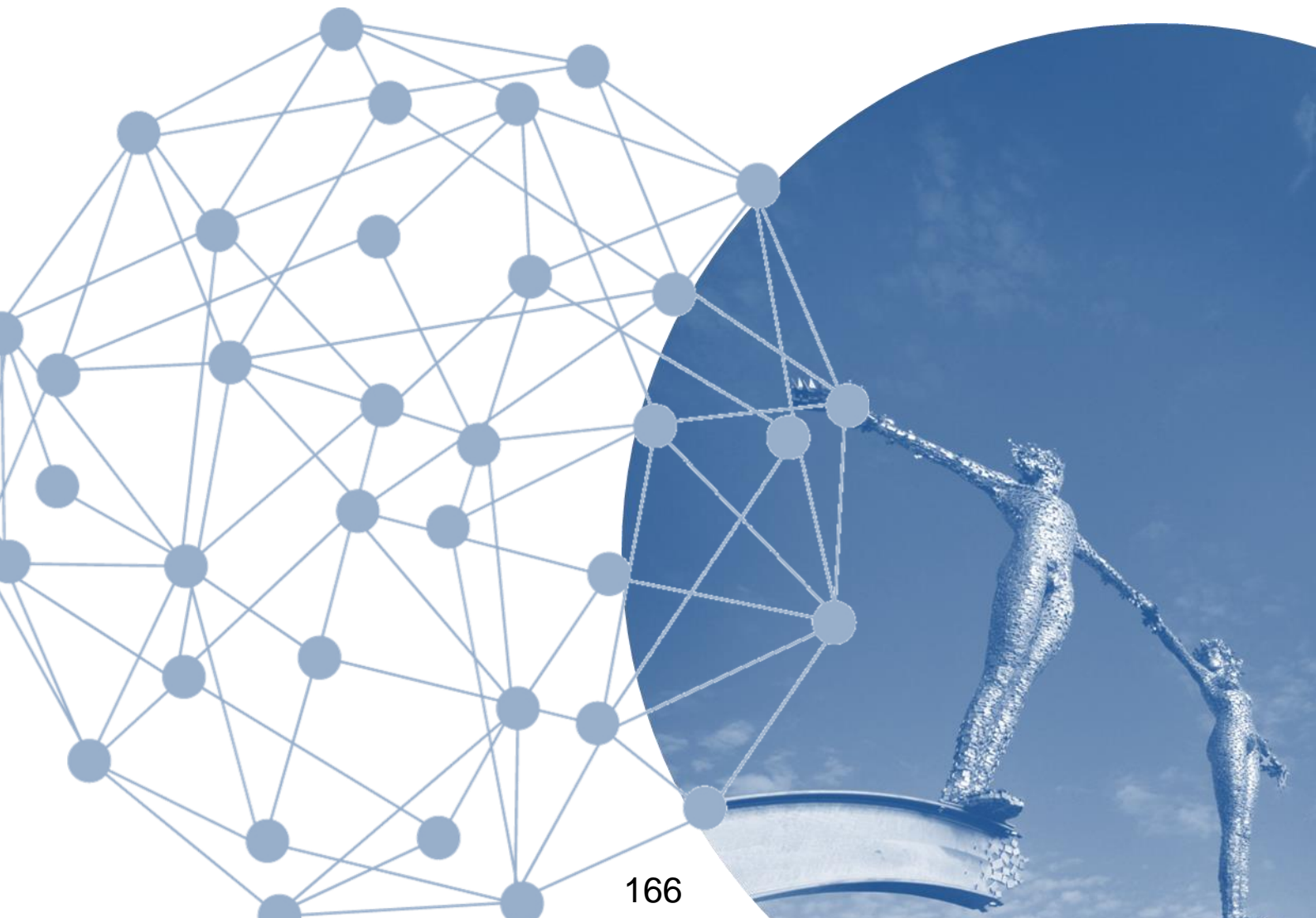
Signed: A. Hair

Date: 12/09/25

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.



Mental Health, Stress & Wellbeing Policy 2026



DOCUMENT CONTROL SHEET:

Key Information:

Title:	Mental Health, Stress and Wellbeing Policy
Date Issued:	<u>23 April 2026</u>
Date Effective From:	<u>On approval by Council</u>
Version Number:	1.1
Document Type:	Policy
Document Status:	Draft
Author:	Russell Dadzie / Paulina Malczewska
Owner:	Health & Safety Team
Approver:	Council
Approved by and Date:	<u>TBC</u>
Contact:	<u>Health and Safety</u>

Revision History:

Version:	Date:	Summary of Changes	Name:	Changes Marked:
<u>0.1</u>		<u>Draft</u>	<u>SS</u>	<u>N/A</u>
<u>0.2</u>		<u>Minor changes to clarify some points.</u>	<u>SS</u>	<u>No</u>
<u>0.3</u>	<u>June 2021</u>	<u>Significant redrafting – clarifying roles and responsibilities, and measures for managing mental health, stress and wellbeing</u>	<u>RD</u>	<u>No</u>
<u>1.1</u>	<u>April 2025</u>	<u>Draft – Review of existing Policy; minor changes with additional details</u>	<u>H&S Officer, Paulina Malczewska</u>	<u>N/A</u>

1. Policy Statement

- 1.1. Clackmannanshire Council is committed to ensuring the health and welfare of employees, including their mental as well as physical health and wellbeing. As an employer, we aim to create and maintain a workplace environment that promotes and supports good mental health and wellbeing for all employees.
- 1.2. The Council recognises its responsibilities under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, and the Equality Act 2010 in this regard.

2. Introduction

- 2.1 Mental health and wellbeing is an important aspect of overall health and wellbeing and can be affected by different factors, including life events such as relationship breakdowns, bereavement, workplace pressures and mental health conditions such as depression or anxiety. The National Health Service (NHS) describes mental wellbeing and mental illness as follows:

Mental Wellbeing - Definitions of mental wellbeing generally include aspects such as: life satisfaction, optimism, self-esteem, mastery and feeling in control, having purpose in life, and a sense of belonging and support.

Mental Illness - refers to a diagnosable condition or personality disorder that significantly interferes with an individual's cognitive, emotional or social abilities, e.g. depression, anxiety, schizophrenia. The International Classification of Diseases ICD 10, Chapter 5 provides a comprehensive list of recognised mental and behavioural disorders.

Stress - The Health and Safety Executive (HSE) defines stress as 'the adverse reaction people have to excessive pressures or other types of demand placed on them. It arises when they perceive that they are unable to cope with those demands'.

- 2.2. Promoting positive mental health and wellbeing in the workplace is essential to strengthen the positive, protective factors of employment, reduce risks factors for mental ill health and improve general health.

2.3 Although it can be healthy for people to experience challenges in their lives, this can cause a degree of pressure on the individual. It is acknowledged that too much pressure can be harmful and destructive to health and, if excessive or long term, this can lead to stress. It is recognised that while stress can result from a build-up of excessive pressures in the workplace, it can equally result from non-work related pressures or life events that transfer the symptoms to the workplace.

3. Purpose and Scope

3.1 The purpose of this policy is to:

- Create a working environment where the mental health and wellbeing of employees is paramount and where colleagues feel valued and protected.
- Set clear responsibilities for ensuring safe and healthy workplace, and positive mental wellbeing, for all employees.
- Clearly outline measures that will be pursued to ensure good mental health and wellbeing for all staff.

3.2 The aims of the policy are to:

- Promote mental health and wellbeing for all staff.
- Promote an open and supportive culture where mental health issues can be raised and dealt with effectively.
- Communicate and promote the council's commitment to identifying and tackling organisational issues that negatively affect mental health and wellbeing.
- Ensure suitable and sufficient risk assessments are conducted in accordance with the HSE Management Standards to prevent, identify and control sources of work-related stress, and ensure that the outcomes of risk assessments are reported and acted upon. Training in dealing with Stress Risk Assessments (SRAs) and how to support staff is available to all managers and HR Business Partners via e-learning module. SRA meetings should focus specifically on identifying and addressing these workplace stressors.
- Provide employees experiencing mental health problems with access to professional assistance and support. Reasonable paid time off to access

support will be given in line with relevant policies and procedures, such as Maximising Attendance Policy, Work Life Balance and Flexible Working Policy, etc.

- Reduce barriers to employment for people who have experienced mental health problems.

3.3 This policy applies to all employees of Clackmannanshire Council. The implementation of this policy will be supported by other relevant Council policies and guidance e.g. Maximising Attendance Policy, Work Life Balance and Flexible Working Policy, Stress Risk Assessment Guidance, Managing Stress – A Guide for Managers, Family Friendly Policy, etc.

4. Responsibilities

4.1. The Chief Executive & Senior Managers

The Chief Executive has overall responsibility for Health, Safety and Welfare within the council, and ensuring that suitable arrangements and procedures are in place to comply with this policy and all relevant health and safety legislation.

In line with the Council's scheme of delegation, senior managers are responsible for ensuring that this policy is effectively implemented throughout out their areas of service.

4.2. Employees with Line Management Responsibilities

Managers play a key role in creating a mentally healthy workplace and, in this regard, are responsible for:

- Managing their staff in a manner which is not detrimental to mental health and which, at its best, can positively promote mental health and wellbeing;
- Ensuring, as far as is reasonably practicable, that the work environment is safe and that measures are taken to reduce the risk of mental ill health as a result of work related factors;
- Providing supportive leadership and creating an open and supportive environment that encourages employees to discuss issues related to mental ill health;

- Initiating and maintaining effective and consistent communication with team members, including wellbeing conversations;
- Reviewing management information, being alert to indicators of stress within the team and undertaking risk assessment as appropriate;
- Ensuring that all new employees receive appropriate induction and training and, thereafter, identifying and meeting the learning and development needs of all employees through the use of the Constructive Conversations meetings;
- Monitoring workloads, working hours and holidays to ensure that staff are not overloaded or overworking, and are taking their full holiday entitlement;
- Ensuring that all employees are aware of the council's wellbeing programme and support mechanisms, including confidential counselling, employee assistance provision and procedures for dealing with bullying & harassment at work;
- Providing their staff with opportunities to participate in mental health promotion activities;
- Liaising with Human Resources to maximise support for employees who have mental health problems;
- Supporting employees who become sick as a result of mental ill health in accordance with the council's Maximising Attendance Policy, and providing additional support to staff who are experiencing stress outside work, e.g. bereavement, separation, etc;
- Monitor and report on levels of sickness absence which relate to mental health problems, including stress-related illness (in conjunction with the occupational health service and human resources);
- Completing relevant Mental Health Awareness and Stress Management Training.
- Treat employees with dignity and respect.

4.3 Employees

All employees are obliged to take account of their own health and safety in the workplace along with that of others and, in this regard, are responsible for:

- Raising issues of concern promptly with their line manager, HR or TU rep, so they can be addressed at an early stage;
- Being alert to symptoms of stress in themselves and others;

- Supporting any colleague experiencing poor mental health by encouraging them to speak to their line manager;
- Seeking appropriate support at the earliest opportunity from their GP, the Employee Assistance Programme or other appropriate agencies if they have health and wellbeing problems;
- Recognising the importance of achieving a work-life balance;
- Cooperate with managers to assess levels of stress and engage with measures to support mental ill-health issues.
- Treating other employees with dignity and respect.

4.4 Human Resources

Human Resources will:

- Provide confidential advice and support to employees and managers in relation to this policy and ensure policies and procedures are being followed.
- Help signpost appropriate support for employees who are experiencing mental ill-health.
- Where there is conflict between manager and employee facilitate relevant processes to help resolve the issues.

4.5 Health & Safety Team

The Health & Safety Team will:

- Train and support managers in promoting mental health and wellbeing, and in implementing stress risk assessments - ensuring policies are being followed.
- Monitor and review the effectiveness of measures to promote mental wellbeing and report this to the Executive Health & Safety Committee and Tripartite as required.

4.6 Occupational Health & Employee Assistance Programme

Occupational Health and Employee Assistance Programme (EAP)/Employee Counselling Service will provide advice to employees and managers to help employees remain at work if possible. They will:

- Provide specialist advice on mental wellbeing.

- Support individuals who have been off sick with mental health and stress problems, and advise them and their management on a planned return to work.
- Refer individuals to workplace counsellors or specialist agencies as required.

4.7 TU Safety Representatives

Safety representatives can support employees in identifying the causes of stress and meeting with management to raise and address issues which may be causing them stress. They will:

- Promote mental wellbeing across the Council.
- Participate in Healthy Working Life Group activities, and the Council's wellbeing planning and implementation.
- Encourage employees who approach them to seek appropriate support.

4.8 Healthy Working Lives Group

The Council's Healthy Working Lives Group will promote healthy lifestyles for employees by initiating and leading wellbeing campaigns, activities and opportunities, such as healthy eating, stress control, smoking cessation, drugs and alcohol awareness, employee engagement, etc.

Their objectives are:

- To promote a healthy work environment and improve the mental and physical health and wellbeing of Council's employees.
- To address the specific challenges arising from remote working, including isolation, unhealthy working habits, and stress.
- To enhance employee's morale, engagement, and overall wellbeing
- To lower absenteeism and improve overall productivity.

5. Measures for Managing Mental Health, Stress and Wellbeing

5.1 Promotion of Mental Health and Wellbeing for all staff

- All employees will undergo a mandatory mental health awareness and wellbeing training. The training will provide a basic understanding of mental health and wellbeing issues, and highlight the various resources and support available to staff.

- The Council will run regular mental health and wellbeing campaigns to encourage awareness of mental health issues.
- All employees will be given opportunities to look after their mental wellbeing and participate in mental wellbeing activities, e.g. physical activities, stress busters, social events, relevant mental health and wellbeing seminars/workshop, etc.
- Employees will, wherever possible, be offered flexible working arrangements that promote their mental wellbeing.
- Employees will be given the opportunity to influence how they do their jobs, scope for varying their working conditions as far as possible, and opportunities to develop and fully utilise their skills.
- Managers will ensure that employees are set realistic targets that do not require them to work unreasonable hours, and have clearly defined job descriptions, objectives and responsibilities.
- Appropriate actions will be taken to effectively manage conflict and ensure the workplace is free from bullying, harassment and any form of discrimination.
- Wellbeing Champions will receive relevant awareness training in mental health and wellbeing. They will liaise with the Council Healthy Working Lives Group, Health and Safety and Human Resources Teams, and Team Managers/Supervisors in leading and promoting mental health and wellbeing activities in their respective teams.

5.2 Promotion of an Open and Supportive Leadership Culture

The following will be pursued:

- Managers will undergo relevant mandatory mental health and wellbeing training (such as NHS 'Mentally Healthy Workplace', or SAMH 'Mental Health in the Workplace – a Guide for managers' and 'Understanding Stress Management in the Workplace') to enable them to promote the mental wellbeing of their staff and deal with issues around mental health and stress effectively.
- Managers will help to prevent excessive pressure becoming stress by recognising the common signs and symptoms of this in themselves and others, by ensuring that appropriate interventions are carried out and by

promoting an open and supportive environment that encourages employees to discuss issues. Tips on signs of mental wellbeing issues and stress are contained in the Council document: *Managing Stress – A Guide for Managers*.

- Managers will give non-judgemental and proactive support to individuals who experience mental health problem, and deal sympathetically with any staff suffering from mental health problems due to circumstances outside the workplace.
- All matters discussed between manager and member of staff must be treated with strict confidentiality and not disclosed to anyone without express permission from the staff member. Any concerns from managers should be raised with the relevant HR Business Partner or a member of the H&S Team.
- They should ensure that their management style reflects the behaviours outlined in the Council's Competency Framework and Dignity at Work Procedure.

5.3 Effective and Consistent Communication

- Managers should ensure effective and consistent communication with team members to enable them identify and tackle any organisational or work-related issues (e.g. job demands, control over the job/role, support from managers and colleagues, working relationships, the role and changes at work) that negatively affect the mental health and wellbeing of their staff. This can be achieved through regular team meetings, constructive conversations, and wellbeing conversations. Regular and consistent communication will also offer employees the opportunity to alert their line managers to any mental health or stress related concerns they may have.
- Communication at an early stage is important to allow any mental wellbeing issues or causes of stress to be identified and appropriate action to be taken to minimise its effects on the employee and on service delivery.
- A good two-way communication should be established and maintained to ensure staff involvement, particularly during periods of organisational change, or any unexpected events.
- Managers should be particularly aware of the impact that organisational change may have on employees and should ensure that appropriate

communication and adequate support is provided, particularly where it is known that an employee may already be vulnerable to stressful reactions.

5.4 Management of Stress

5.4.1 Identifying the Causes and Symptoms of Stress

- A strong moral and business case exists for addressing the causes of stress in the workplace and the council places emphasis on preventing stress wherever possible. In order to do so, managers and employees alike need to be equipped to identify possible sources and triggers of stress in the workplace.
- While the council cannot prevent or control the causes of stress, early identification of the symptoms of stress will allow employees to be supported in the workplace and assisted to manage the circumstances which are causing them stress.
- Each team must have a stress risk assessment which identifies the likely sources of stress and measures to control these. These should be reviewed on a regular basis in line with the Council's Risk Assessment policy. The Health & Safety Team can provide support in identifying causes of stress within a team.
- Where issues of mental ill-health are identified, the line manager should liaise with the HR Business Partner to ensure that appropriate support is offered. Agreement must be reached by line manager and employee before that information is shared with HR/H&S.

5.4.2 Stress Management Standards

The Health and Safety Executive (HSE) has identified six key areas (or risk factors) which may lead to work related stress. These are:

- Demands of the job;
- Employee's control over their work;
- The support an employee receives from managers and colleagues;
- Relationships at work;
- Role in the organisation;
- Change and how it's managed.

Key to managing these risks are ensuring supportive leadership and effective and consistent communication, along with appropriate risk assessment as described in sections 5.2 and 5.3. The Council will strive to implement the HSE management Standards.

5.5 Support for Mental Ill-Health

5.5.1 Line Management Support

- Employees who are experiencing symptoms of mental ill-health are encouraged to advise their manager at the earliest opportunity in order that the most appropriate means of help can be identified and offered. Where employees are not comfortable speaking to their line manager, they should speak to one of the HR Business Partners, H&S, their TU Rep or a Mental Health First Aider.

In some cases the employee's concerns will be alleviated by reviewing the balance of their workload commitments and any other non-work commitments to determine whether they are taking on/allocated more than they can realistically cope with. A temporary adjustment to workload priorities and/or some support in self-regulating their work, such as the use of time management techniques may be sufficient to assist the employee manage and control their stress levels.

- The Stress Risk Assessment process may be helpful to identify more significant issues including unrealistic workloads or pressures. The documents for this are issued by the line manager and analysed by the Health and Safety Team. The manager, or a nominated person, is then responsible for discussing the report and implementing any measures to help control or prevent the stress being exacerbated.
- If an employee is not comfortable approaching their manager or having done so feels that their concerns have not been adequately addressed, they should seek advice from Human Resources. Additionally, the employee may wish to seek advice from a Trade Union representative, and if appropriate, seek a medical view from their GP.

5.5.2 Mental Health First Aiders

- The Council also has a number of employees who have undertaken the Mental Health First Aid training and have gained crucial skills in managing mental health in the workplace and how to support others.
- List of names and contact details of Council Mental Health First Aiders will be published and made accessible to all employees.

5.5.3 Employee Assistance Programme

The council offers free access to an employee assistance programme which can provide support for work and non-work related issues (e.g. health, legal, marital, relationship, family, financial, substance abuse or emotional concerns, etc.). A telephone helpline, web portal, live chat and mobile phone app are available to all employees 24 hours a day, any day of the year. The support provided includes:

- Structured Counselling – available via telephone, face-to-face or online depending on the issues requiring support.
- Trauma and Critical Incident Support
- Eye Movement Desensitisation and Reprocessing therapy.
- Cognitive Behaviour Therapy.

5.5.4 Stress Control Classes and other Wellbeing training

- Stress Control classes are also held within the Council and the local community.
- A number of e-learning courses are also available to all employees on Clacks Academy.
- The Council will also, on a regular basis, identify and run relevant mental health and wellbeing seminars/workshops to support staff.

5.6 Reducing Barriers to Employment for People with a History of Mental Health

5.6.1 Council Policy on Maximising Attendance

- Where an employee is advised by their GP to take some time off as a result of a mental health condition, the relevant provisions of the council's Maximising Attendance Policy will apply in conjunction with this policy. In these circumstances, managers should adopt a proactive but sensitive approach so

that the employee does not feel isolated or guilty. The manager should establish with the employee whether regular contact would be helpful and how this should be arranged during the period of absence.

Care should be taken to ensure that any return to work is planned and the employee supported to prevent further absence. Occupational Health advice can be invaluable in achieving this.

6. Monitoring and Review

This document is subject to monitoring by management and Trade Unions on an ongoing basis. Revisions and updates will be implemented by the Council following consultation with recognised Trade Unions.

Policy Name	Mental Health and Wellbeing Policy
Department	Partnership & Performance
Policy Lead	H&S Manager
Equality Impact Assessment	
Full EQIA required	Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/>
* In no please provide rationale Policy applies equally to all Council employees and does not negatively impact on any group which falls within any of the 9 protected characteristics	
Date Full EQAI complete	N/A
Date Approved	
Review Date	





Equality and Fairer Scotland Impact Assessment (EFSIA) Summary of Assessment

Title: Mental Health, Stress & Wellbeing Policy

Key findings from this assessment (or reason why an EFSIA is not required):

Revision of existing policy which helps to reduce inequalities due to mental ill-health. This policy applies equally to all employees and has only positive impacts on equalities.

Summary of actions taken because of this assessment:

1. Review the evidence available on mental ill-health
2. Consultation with the Council's Policy Group & Executive Health & Safety Committee.

Ongoing actions beyond implementation of the proposal include:

1. Monitoring to ensure policy is applied consistently across the Council.
2. Ongoing review and consultation of the Policy.
3. Healthy Working Lives to support promoting health campaigns.
4. Support via signposting to relevant services, etc.

Lead person(s) for this assessment:

Paulina Malczweska

Senior officer approval of assessment:

DATE: 21/01/26

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

This form should be completed using the guidance contained in the document: ['NAME']. Please read the guidance before completing this form.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

The policy outlines Clackmannanshire Council's commitment to supporting the mental health, stress management and wellbeing of its employees. It sets out the roles, responsibilities and strategies for creating a safe, inclusive and mentally work environment. The policy aims to promote an open, supportive culture, reduce stigma around mental health, ensure early access to support, and implement measures for stress prevention and wellbeing improvement.

2. Why is the proposal required?

The Council has a legal obligation to look after the health, safety and wellbeing of staff. The policy sets out the practical arrangements for how these obligations are undertaken.

3. Who is affected by the proposal?

All Council employees.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

Health, Safety & Wellbeing Strategy, and a number of

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

Yes

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- *help you to understand the importance of your proposal for those from equality groups,*
- *inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and*

- provide justification for the outcome, including where it is agreed an EFSIA is not required.

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Age	Scottish Health Survey 2021	Mental health issues can affect all ages, but different age groups may face different stressors. Mental health generally improves with age.
Disability	Scottish Health Survey 2021	Those with a disability are significantly more likely to also experience mental ill-health. Under the Equality Act 2010 long-term mental health condition may be considered as a disability. The condition is long term if it lasts or is likely to last 12 months.
Race	Scottish Surveys Core Questions 2017	Mental wellbeing is declining for most of our workforce demographic. Cultural differences may affect how mental health is perceived and reported. An inclusive approach ensures access to support.
Sex	Scottish Health Survey 2021	There is no significant difference in different genders wellbeing, but evidence shows men are less likely to seek help for mental health issues. Women may face stress from caregiving roles.
Gender Reassignment		Transgender individuals face increased risks of poor mental health. The inclusive nature of the policy, including access to support and anti-discrimination protection, supports their wellbeing.
Sexual orientation	Scottish Surveys Core Questions 2017	LGBTQ+ individuals are more likely to experience mental health challenges, including anxiety and depression, often linked to experience of stigma, discrimination, etc.
Religion or Belief	Scottish Surveys Core Questions 2017	Roman Catholic and Other Christian groups reported higher mental wellbeing scores than those in the No Religion group.
Pregnancy or maternity		This group may experience heightened emotional and mental stress. The policy helps by promoting open communication, flexible working and access to support for employees.
Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)		
Socio economic disadvantage (if required)	Scottish Health Survey 2021	Mental wellbeing is significantly lower in areas of deprivation and this is evidenced across several different metrics.

7. **Based on the evidence above, is there relevance to some or all of the equality groups? Y/ N/ unclear**
YES
If yes or unclear, proceed to further steps and complete full EFSIA

If no, explain why below and then proceed to Step E:

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

- 8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:**

Policy has been developed to support those who have mental ill-health or wellbeing challenges. It has been developed in consultation with policy group some of whom have direct or family experience of such issues. Consultation has also taken place with the HSCP Mental Health Team and Educational Psychologists.

- 9. Please detail the outcome of any further engagement, consultation and/or research carried out:**

The consultation concluded that the policy has appropriate measures in place to support affected groups.

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

Age	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			
potential for developing good relations			X	
potential to advance equality of opportunity	X			

Disability	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Race	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Sex	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Gender Reassignment	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	x			
potential for developing good relations			X	
potential to advance equality of opportunity	X			

Sexual Orientation	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Religion or Belief	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Pregnancy/maternity	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Marriage/civil partnership	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)			X	

Socio-economic disadvantage	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Yes	No	No impact	
(If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage?	X			

11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

The policy will be supported by measures already agreed in the Health, Safety and Wellbeing Strategy such as the procurement of the HSE Stress Indicator Tool to allow proactive stress risk assessments to be conducted. Training has already been provided to Managers and Wellbeing Champions have been identified and trained to support this policy.

12. **Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment.** Choose from one of the following:

Please select (X)	Implications for the proposal
x	<p>No major change Your assessment demonstrates that the proposal shows no risk of unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
	<p>Adjust the proposal and/or implement mitigations You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.</p>
	<p>Continue the proposal with adverse impact The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.</p>
	<p>Stop the proposal The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

Step E - Discuss and review the assessment with decision-makers

13. **You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment. Record details of these discussions and decisions taken below:**

Agreed at Executive Health & Safety Committee on 2nd February 2026.

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. Record any post-implementation actions required.

Metrics are reviewed at Executive Health & Safety Committee on a quarterly basis. Some are also discussed at Service Bipartite meetings. Any issues identified are addressed or raised as appropriate.

15. Note here how you intend to monitor the impact of this proposal on equality groups.

Metrics are reviewed at Executive Health & Safety Committee on a quarterly basis. Some are also discussed at Service Bipartite meetings. Any issues identified are addressed or raised as appropriate.

Staff survey results will also provide information to support this.

16. Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:

Annually

Step G – Assessment sign off and approval

Lead person(s) for this assessment:

Signed: Paulina Malczewska

Date: 26/01/2026

Senior officer approval of assessment:

Signed: A. Hair

Date: 26/01/26

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.

