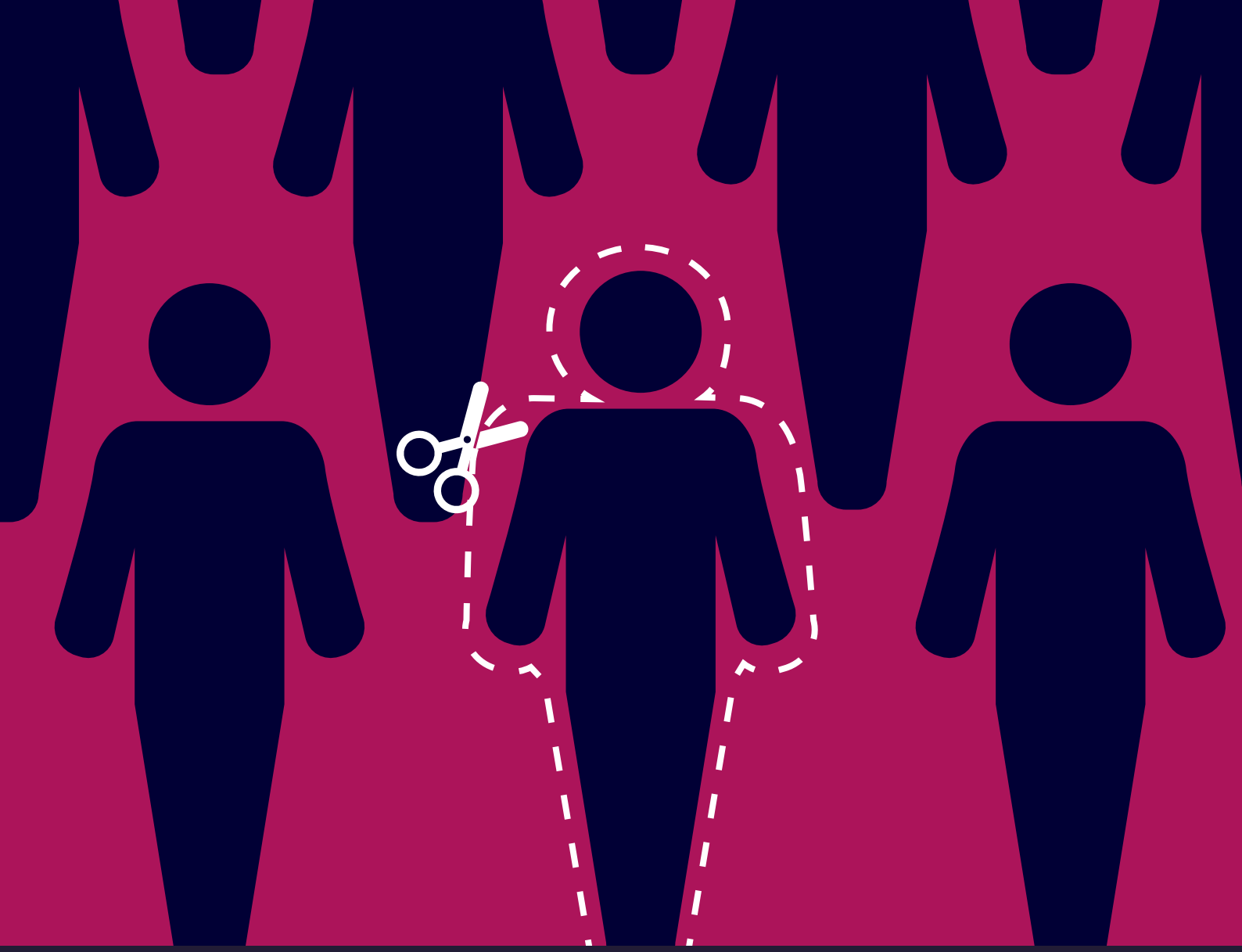


NHS Greater Glasgow and Clyde

Preventing Sexual Harassment at Work

Guide for Managers and Supervisors

This document includes the strengthened legal duties taking effect on the 30 October 2026.

NHS
Greater Glasgow
and Clyde

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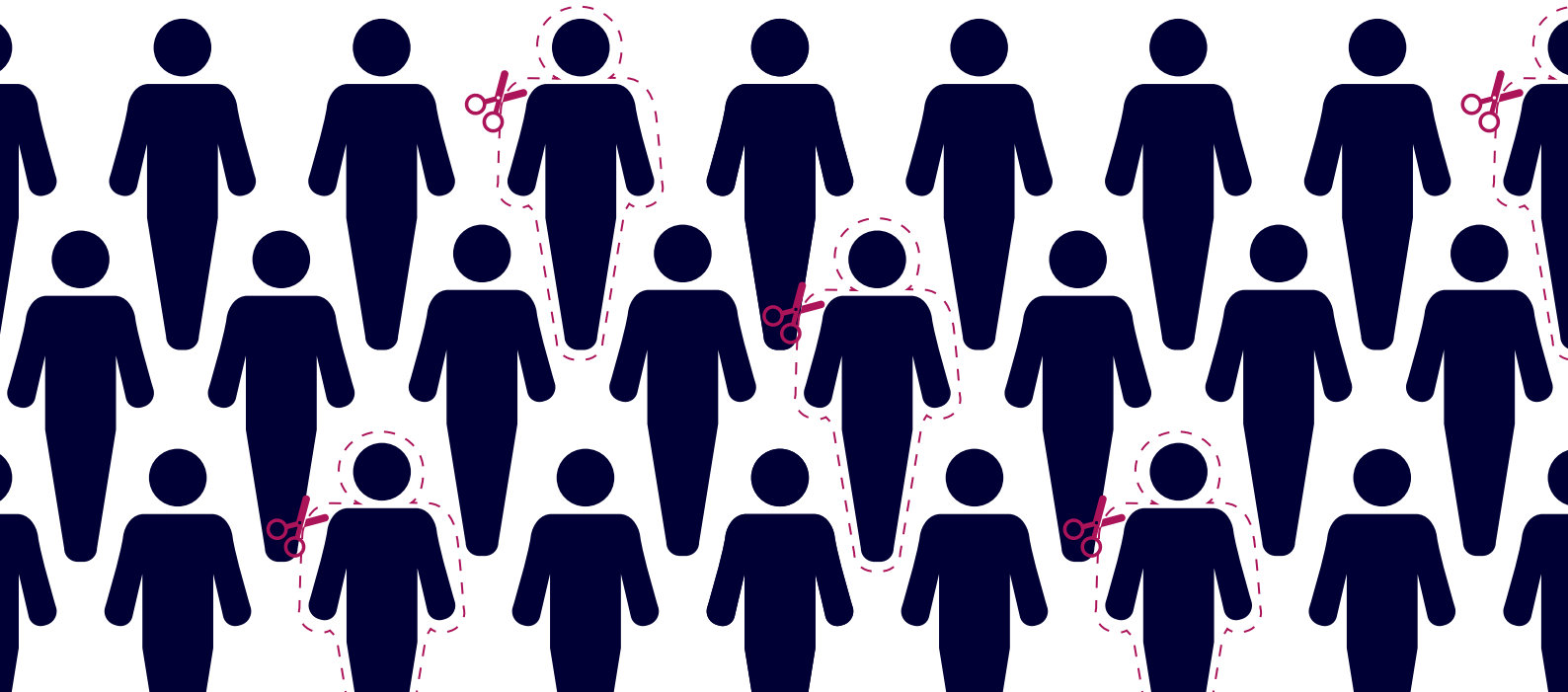
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Introduction

This guide has been developed through NHS Greater Glasgow and Clyde's **Cut It Out and Equally Safe at Work programmes**. It supports managers and supervisors to apply current NHS Scotland workforce policies, supporting documents, national guidance and approved local arrangements. It does not create a separate policy, reporting route or investigation process.

NHS Greater Glasgow and Clyde (NHSGGC) takes a trauma-informed and person-centred approach. Managers and supervisors should listen without judgement, avoid asking someone to repeat unnecessary detail and respect the person's choices wherever possible. They must also consider immediate safety and any safeguarding, legal or professional responsibilities.

This guide mainly uses the term "person affected". The NHS Scotland Sexual Harassment Guide uses "victim-survivor". Managers and supervisors should use the language the person is comfortable with.

Purpose

This guide explains what managers and supervisors need to do to prevent sexual harassment, respond safely when a concern is raised and use the relevant NHS Scotland policies and guidance.

It covers:

- How to identify and address risks before harm occurs
- How to respond when someone raises a concern
- How to manage risks involving patients, relatives, carers, visitors, contractors and other third parties
- How to identify the relevant NHS Scotland policy, guidance or process
- Where to find advice, learning and support.

It is intended for managers and supervisors supporting staff and others covered by the relevant NHS Scotland workforce policies, including bank, agency and sessional workers, volunteers, contractors and people on placement.

This guide does not replace NHS Scotland workforce policies, their supporting documents or case-specific advice. Managers and supervisors should use it alongside the current online policies and supporting documents. If this guide differs from a current national policy or supporting document, the national document takes precedence.

Manager Quick Guide

From **30 October 2026**, employers must take **all reasonable steps** to prevent sexual harassment.

This strengthens the current requirement to take reasonable steps. It places a clear emphasis on identifying risks and acting before sexual harassment occurs.

The legal duty sits with the employer. Managers and supervisors support NHSGGC to meet it by identifying local risks, putting agreed measures into practice and setting clear standards within their teams.

Prevent

What managers and supervisors need to do:



- Set clear standards of behaviour
- Consider where sexual harassment could occur, including risks involving third parties
- Use existing workforce, risk, safeguarding and incident-reporting arrangements
- Put agreed preventative measures and safe systems of work into practice
- Address inappropriate behaviour rather than allowing it to become normal
- Make sure staff know how to raise a concern and find support
- Complete learning required for the role and promote the wider learning available
- Review local arrangements when risks or working practices change.

Respond

If someone raises a concern:



- Find a private place where you will not be disturbed
- Listen without judgement and take the concern seriously
- Check immediate safety and ask what support the person needs
- Do not press for unnecessary detail
- Explain confidentiality and the limited circumstances in which information may need to be shared
- Share information only with people who need it, and only what they need to know
- Seek advice through the appropriate route before confirming what happens next
- Agree who will keep the person informed
- Make an objective and factual record and explain how it will be handled.

Act

- Seek advice through the appropriate route
- Agree what will happen next
- Make clear who will keep the person informed
- Make an objective and factual record
- Review whether any risk control or preventative measure needs to change.



Avoid

- Dismissing or minimising the concern
- Asking why the person did not speak sooner
- Pressing for unnecessary detail
- Asking the person to confront anyone
- Starting formal or detailed fact-finding beyond the initial conversation
- Promising absolute confidentiality or a particular outcome
- Discussing the matter with anyone who does not need to know.



1. Which Policy or Guide Applies?

Sexual harassment may engage more than one NHS Scotland policy, guide or process.

The appropriate route will depend on the circumstances, who carried out the behaviour and whether there is an immediate or continuing risk.

Do not delay support while deciding which route applies. Deal with any immediate safety concern, listen to the person and seek advice if the correct route is unclear.

Sexual harassment at work

Use the **NHS Scotland Sexual Harassment Guide** alongside the **Bullying and Harassment Policy** where a member of staff is currently experiencing, or has previously experienced, sexual harassment in the workplace.

The Sexual Harassment Guide supports staff, managers and teams. It applies across job roles, grades and levels of experience and should be read alongside the **Gender-based Violence Policy Guide for Managers**.

Sexual harassment is unwanted conduct of a sexual nature that is intended to, or has the effect of:

- Violating someone's dignity
- Creating an intimidating, hostile, degrading, humiliating or offensive environment.

A lack of intention does not prevent behaviour from amounting to sexual harassment.

A single incident can be enough. A person can also be affected even if the conduct was not directed at them.

Bullying or harassment involving colleagues

Use the **NHS Scotland Bullying and Harassment Policy** where the concern involves bullying or harassment by another employee, or by an employee of another organisation where the behaviour affects the working environment.

The policy provides:

- A route for early resolution where this is appropriate
- A formal route for unresolved, significant or persistent concerns.

A single serious incident may be significant enough to require formal consideration.

Early resolution

The Bullying and Harassment Policy supports early resolution where it is appropriate. However, direct contact, a supported conversation or mediation will not be suitable in every sexual harassment case.

Before discussing early resolution, consider:

- The nature and seriousness of the behaviour
- Any immediate or continuing risk
- What the person affected wants
- Whether the person would feel safe
- Any difference in authority or influence
- Whether the behaviour may amount to serious misconduct or a criminal offence.

Do not pressure someone to confront the person concerned or take part in mediation. Mediation is voluntary.

Seek HR advice where the appropriate route is unclear or where there are safety concerns, a significant difference in authority, possible serious misconduct or a possible criminal offence.

Gender-based violence, including violence against women and girls

Use the **NHS Scotland Gender-based Violence Policy** where a member of staff discloses current or previous gender-based violence, whether the abuse occurred inside or outside work.

The policy provides a framework for:

- Supporting staff affected by gender-based violence
- Considering safety and workplace support
- Responding where an employee is accused of gender-based violence
- Responding where an employee says they have carried out abuse.

Gender-based violence includes a range of harmful behaviour rooted in gender inequality and the abuse of power. Women and girls are disproportionately affected, although men, boys and LGBTQ+ people can also be affected.

When a member of staff discloses gender-based violence that has taken place outside work, do not assume that the Bullying and Harassment Policy is the correct route.

Manager and supervisor response



Arrange a private and safe conversation



Respond sensitively



Consider any immediate risk at work, at home or while homeworking



Discuss appropriate workplace support or adjustments



Provide information about reporting and specialist support if the person wishes



Agree how safe and confidential contact will be maintained



Review support and any adjustments when circumstances change



Consider whether child protection, adult protection or another safeguarding process may apply



Consider whether another workforce policy is relevant



Seek advice where the circumstances affect work, safety, safeguarding or another member of staff.

The person should retain choice and control wherever possible. If immediate or significant safety concerns, safeguarding duties or other legal responsibilities require action, explain this before sharing information or escalating the concern wherever it is safe to do so.

Work-related violence and aggression

Use the **NHS Scotland Work-related Violence and Aggression Policy** where someone is abused, threatened or assaulted in circumstances connected with work.

This may include behaviour by:

- Patients
- Relatives or carers
- Visitors
- Members of the public
- Contractors
- Other third parties.

Where sexual harassment by a third party also involves abuse, threats or assault, both the **Sexual Harassment Guide** and the **Work-related Violence and Aggression Policy** may apply.

Possible misconduct by an employee

The **NHS Scotland Conduct Policy** may apply where an employee's behaviour could fall below the standards required by NHS Scotland or amount to misconduct.

Do not make a conduct finding during the initial supportive conversation. Where formal fact-finding or investigation is required, follow the **Workforce Policies Investigation Process** and obtain appropriate advice.

Where policies overlap

More than one policy or process may apply. **Do not delay immediate support while deciding which route to use**.

Deal with any immediate safety concern, listen to the person and seek advice if the correct route is unclear. Make clear what will happen next and who will keep the person informed.

2. The 2026 legal changes

The Employment Rights Act 2025 introduces two changes relevant to this guide.

Whistleblowing protection from 6 April 2026

From **6 April 2026**, a disclosure about sexual harassment may qualify for whistleblowing protection.

The person must reasonably believe that:

- Sexual harassment has happened, is happening or is likely to happen
- Raising the concern is in the public interest.

Other legal requirements for a protected disclosure must also be met. Managers and supervisors should not decide the legal status of a disclosure themselves.

Managers and supervisors should:

- Take the information seriously and maintain confidentiality
- Keep an objective record
- Seek advice where whistleblowing protection may apply
- Do not treat someone unfavourably because they raised or supported a concern
- Do not tell the person that the disclosure is automatically protected, or that it is not protected.

Preventative duty from 30 October 2026

From **30 October 2026**, employers must take **all reasonable steps** to prevent sexual harassment.

Third-party harassment from 30 October 2026

From 30 October 2026, **employers can be liable for harassment by a third party unless they have taken all reasonable steps to prevent it**.

In an NHS setting, third parties may include patients, relatives, carers, visitors, contractors and other members of the public.

Managers and supervisors should consider foreseeable third-party risks through existing risk-assessment arrangements and put agreed preventative measures into practice.

What “all reasonable steps” means

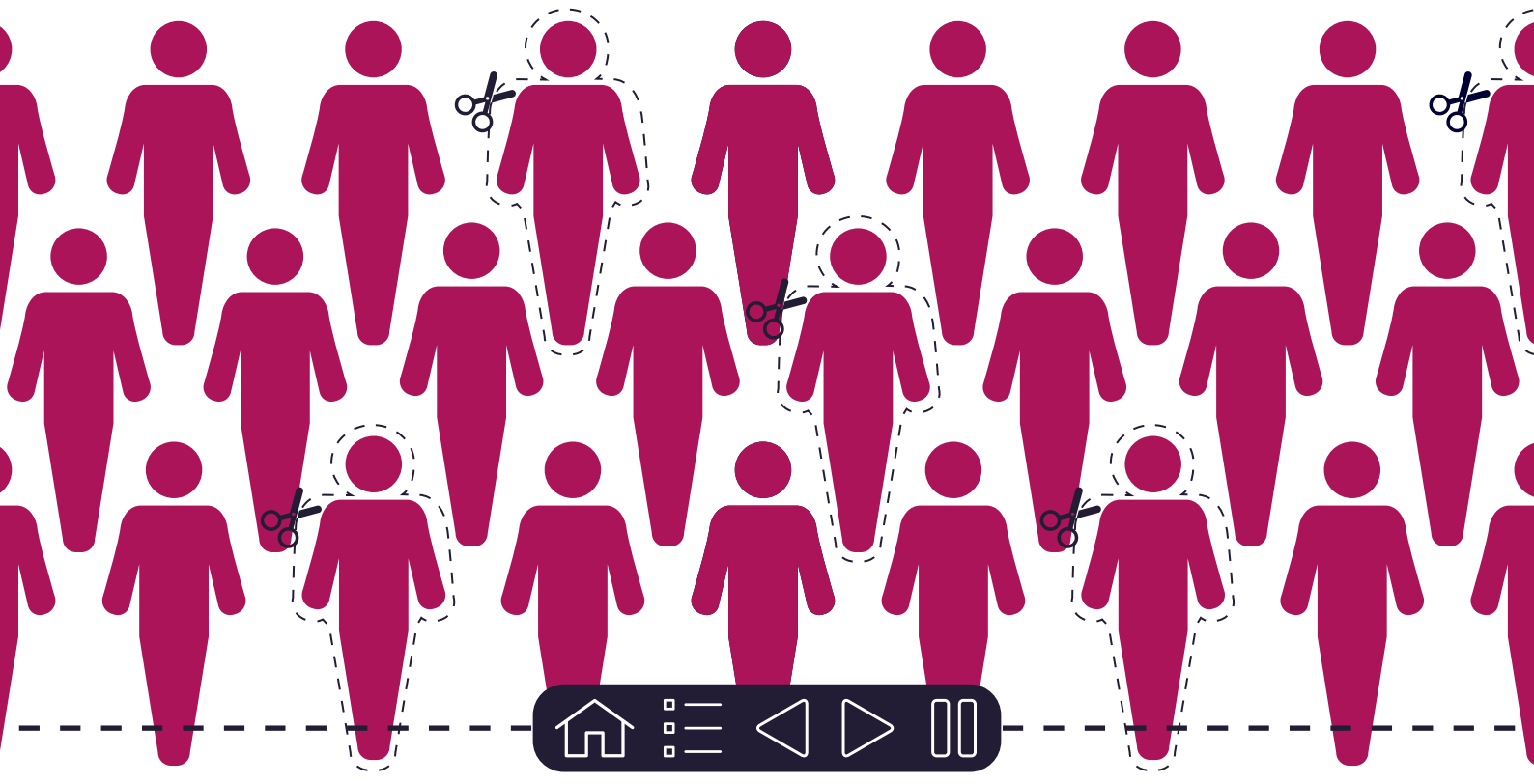
There is no fixed checklist that will be right for every workplace.

What is reasonable will depend on:

- The type of work
- The working environment
- Known or foreseeable risks
- The people who may be exposed to those risks
- Existing safeguards
- What further action can reasonably be taken.

Acas advises employers to assess the risk, identify reasonable preventative steps and put those steps into practice.

Use existing NHSGGC workforce, risk, safeguarding and incident processes. Do not create a separate local procedure for sexual harassment.



3. Preventing sexual harassment

Prevention means acting before harm occurs. It should be part of everyday management, not considered only after an incident or complaint.

Set clear standards

Managers and supervisors should use clear language about sexual harassment and inappropriate behaviour.

Sexual harassment may include:

- Sexual comments, jokes or innuendo
- Unwelcome sexual attention
- Repeated invitations after someone has said no
- Sexualised emails or messages
- Displaying or sharing sexual images
- Sexual gestures
- Unwanted questions about someone's private or sexual life
- Comments about someone's body, appearance or clothing
- Unwanted touching or physical contact
- Suggestive looks, leering or staring
- Spreading sexual rumours
- Behaviour carried out online or through social media.

These examples are not exhaustive.

A single incident may be enough. Behaviour does not need to be repeated before it can be taken seriously.

Managers and supervisors do not need to give staff a legal explanation. The message should be clear:

NHSGGC takes a zero-tolerance approach to sexual harassment, violence against women and gender-based violence. Concerns will be taken seriously and considered through the appropriate policy, support or reporting route.

Consider local risks

Managers and supervisors should consider where sexual harassment could reasonably arise in their area.

Relevant factors may include:

- Lone working
- Public-facing roles
- Isolated work areas
- Changing facilities
- Night shifts
- Work-related travel
- Overnight stays
- Work social events
- Informal messaging services
- Social media
- Alcohol at work-related events
- Temporary posts, placements and training roles
- Differences in authority or influence
- Regular contact with patients or the public.

These are risk factors to consider. They do not mean that sexual harassment is taking place in a particular team.

Use existing local risk arrangements and seek specialist advice where needed.

Include third-party risks

Sexual harassment does not only occur between colleagues.

Where staff have contact with patients, relatives, carers, visitors, contractors or members of the public, managers should consider foreseeable risks and make sure:

- Staff know what behaviour is unacceptable
- Local safety arrangements are understood
- Staff know how to summon assistance
- Reporting arrangements are understood
- Incidents are recorded through the correct system
- Risk assessments and safe systems of work are reviewed
- Agreed preventative measures are followed
- Staff affected are offered appropriate information and support.

The **NHS Scotland Work-related Violence and Aggression Policy** requires managers to raise awareness, support incident reporting, carry out and review risk assessments, implement safe systems of work and provide appropriate information, instruction and training to those at risk.

Patient illness, distress, disability or capacity may affect the response taken. I**t does not remove the need to protect and support staff**.

Make support routes visible

Do not assume that every member of staff:

- Knows where to get help
- Will feel able to speak to their line manager
- Has regular access to email, Core Brief or StaffNet
- Feels confident that raising a concern will be taken seriously.

Alternative routes are particularly important where:

- The concern involves the manager
- The person complained about is more senior
- The employee is in training or on a temporary contract
- The people involved work closely together
- The employee is concerned about the effect on their work or career.

Learning and fair access

Managers and supervisors should make staff aware of the learning available through **Cut It Out and Equally Safe at Work** and support access where it is relevant to the role or work area.

Learning for managers, supervisors and staff

Learning	Intended audience
Sexual Harassment People Management Module	Managers and supervisors
Sexual harassment briefings	Managers and supervisors
Turas sexual harassment e-learning	Managers, supervisors and staff
Active Bystander Training	Managers, supervisors and staff
Speak Up, LearnPro GGC:330	Managers, supervisors and staff
Violence Against Women at Work, LearnPro GGC:353	Managers, supervisors and staff
Local briefings and toolbox talks	Relevant staff groups

Access for staff without routine computer access

Managers and supervisors should make reasonable arrangements for staff who do not routinely use a computer to receive information and access relevant learning during working time. Arrangements should take account of service needs and any approved mandatory training requirements.

Status of the learning offer

Not every course in the **Cut It Out and Equally Safe at Work** offer is mandatory for every member of staff.

Managers and supervisors should promote relevant learning and support staff to access it. Training is mandatory only where it has been formally approved for the role or work area, including through an organisational requirement, safe system of work or training needs analysis. Where training is mandatory, managers must make the necessary arrangements for the relevant staff to complete it.

The **Work-related Violence and Aggression Policy** requires staff to complete training identified for them or their work area through the training needs analysis. Managers must also make sure that staff identified as being at risk receive appropriate information, instruction and training.

Review arrangements

Local arrangements should be reviewed after:

- An incident
- A near miss
- Staff feedback
- A concern about working practices
- A change in service delivery
- A move to a different location
- The introduction of lone working
- A change in patient or public contact
- A change in staffing or supervision.

Record agreed actions through the correct local process.

A short message for your team

> Everyone has the right to be treated with dignity and respect at work.
>
> Sexual harassment is not acceptable. If you experience or witness behaviour that concerns you, you can speak to me or use one of the other advice and support routes.
>
> You will not be expected to deal with it alone.

4. Responding when a concern is raised

The first response matters. Managers and supervisors do not need to decide immediately whether the behaviour meets a legal definition or which formal process applies.

Suggested wording for managers

When someone first raises a concern

> Thank you for telling me. I am taking what you have said seriously. We can take this one step at a time. Before we discuss what happens next, is there anything you need now to feel safe or supported?

Taking the person's account seriously does not mean deciding the outcome of any later process. Managers should respond supportively without making findings or reaching conclusions at this stage.

When discussing confidentiality

> I will treat what you tell me confidentially. I may need to share limited information to obtain advice, manage a serious risk or follow a safeguarding or workforce process. I will explain this to you and involve you wherever it is safe and possible. I will share only what is needed, with people who need to know.

Step 1: Listen

- Find a private place to talk
- Give the person time to speak
- Listen without judgement and use the person's own words when checking your understanding.



Avoid questions that sound doubtful or blaming.

Do not:

- Ask why they did not speak sooner
- Demand a full account immediately
- Make assumptions about anyone involved
- Tell them what they must do.

Step 2: Check immediate needs



Ask whether the person feels safe at work now and consider whether urgent support or practical action is needed.

This may include:

- Immediate safety
- Ongoing contact with the person involved
- Current working arrangements
- Health and wellbeing support
- Safeguarding advice
- Other specialist support.

Discuss proposed changes with the person and seek advice. If immediate action is needed to protect safety, put proportionate interim arrangements in place and review them promptly.

Step 3: Explain your role



Explain your role and be clear about what you can and cannot do.

Do not promise:

- A particular outcome
- Whether formal action will or will not be taken
- That information will never be shared
- A timescale unless it is set by the relevant policy or process.

Explain that advice may be needed before the next step can be agreed.

Step 4: Maintain confidentiality



Tell the person that their information will be treated sensitively and kept confidential, and explain the limited circumstances in which information may need to be shared.

- Obtain advice
- Manage immediate or significant risk
- Support those involved
- Follow a workforce or incident process
- Meet a legal, professional or safeguarding responsibility.

Wherever it is safe and possible, tell the person before information is shared, explain why it is necessary and say who will receive it.

Share only what is needed for that purpose.

Do not promise absolute confidentiality.

Step 5: Seek advice



For workplace concerns involving another employee, use the HR Self Service Portal or contact the **HR Support and Advice Unit**: **0141 278 2700, option 2** or the **Bullying and Harassment Helpline** on **0141 201 8545**.

If the concern also involves work-related violence or aggression, immediate safety, safeguarding or a possible criminal offence, follow the relevant local process and seek specialist advice.

Seek advice before:

- Approaching the person complained about
- Proposing early resolution
- Making significant changes to working arrangements
- Starting any formal or detailed fact-finding beyond the initial conversation
- Choosing an informal or formal route
- Sharing information more widely
- Promising a particular process or outcome.

Where the concern involves work-related abuse, threats or assault, follow the Work-related Violence and Aggression Policy and local incident-reporting arrangements.

If the concern involves the person's line manager, explain the alternative advice and reporting routes.

Step 6: Keep the person informed



Agree:

- Who will make contact
- When contact will be made
- What the person can expect next
- Where support is available
- Who the continuing point of contact will be.

If responsibility passes to someone else, tell the person who will keep in contact.

Step 7: Record the facts



Make an objective and factual record of:

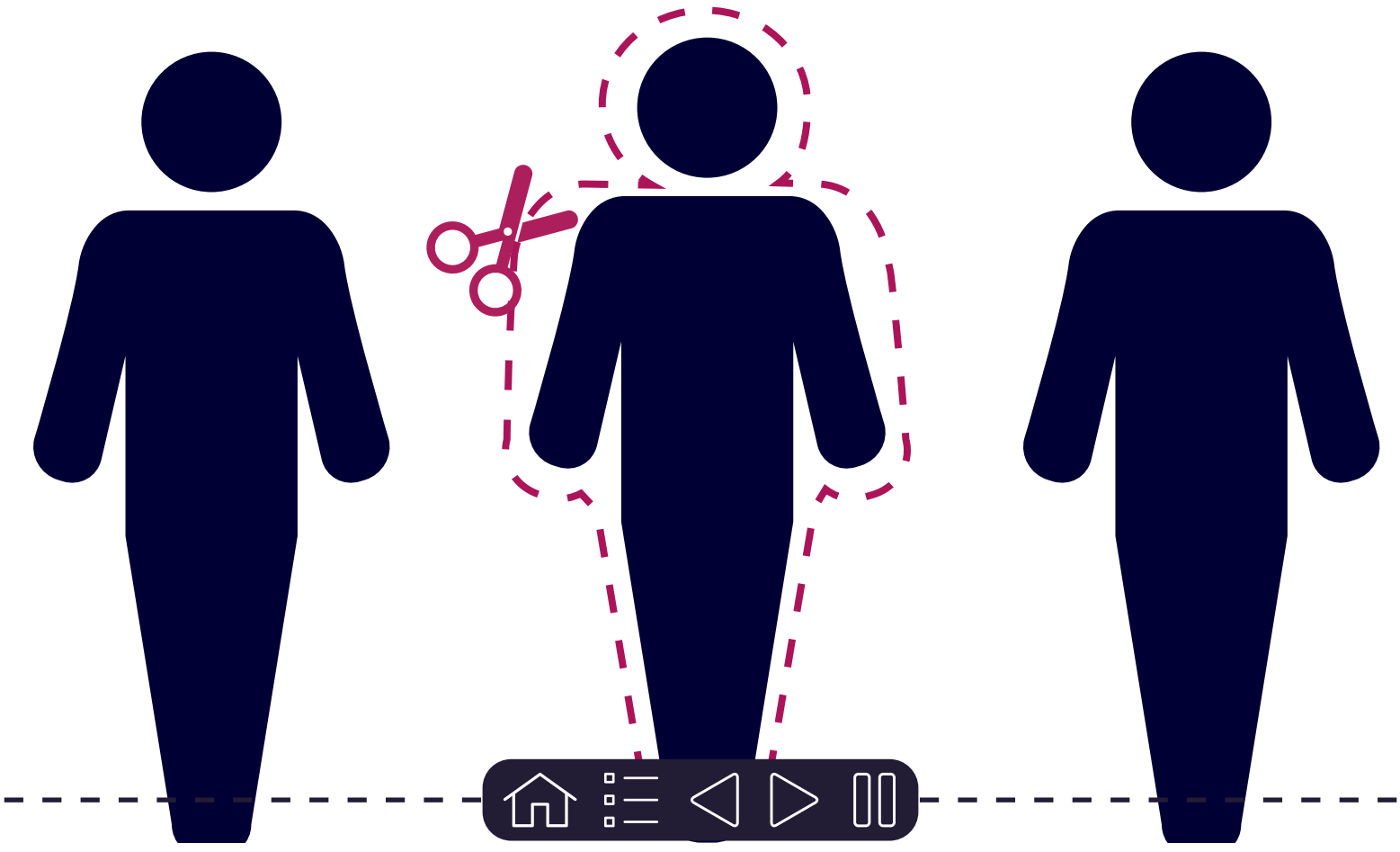
- When the concern was raised
- What the person said
- Any immediate risk
- Advice sought
- Action agreed
- Information given about support
- Who will make the next contact.

Separate facts from assumptions, interpretation and personal opinion.

Store the record securely through the correct workforce or incident-reporting route. Limit access to people who need the information for an authorised purpose.

Where the behaviour involves work-related abuse, threats or assault, follow the **Work-related Violence and Aggression Policy** and record the incident through the approved local system.

Where the **Gender-based Violence Policy** applies, discuss the content and safe handling of any support record with the employee. Explain where information must be recorded or shared through an authorised safeguarding, incident or workforce process. Consider whether it is safe for the employee to receive a copy. Records must be objective and should not include unnecessary personal commentary.



5. Particular situations

"**It was only a joke**". A person's intention is not the only consideration. Focus on what happened, whether it was unwanted, the circumstances and its effect.

Do not dismiss the concern because the behaviour is described as humour or banter.

No formal complaint has been made

Do not ignore a risk or behaviour you have witnessed simply because no formal complaint has been made.

Consider:

- Whether anyone is at immediate risk
- Whether immediate or preventative action can be taken safely and proportionately
- Whether there is a wider risk that needs to be addressed
- Whether advice is needed.

This does not mean automatically starting a formal process against the wishes of the person affected.

The response will depend on the circumstances, level of risk and relevant policy.

The person wants an informal response

Listen to what the person wants. Early resolution may be available, but it will not be suitable in every case.

Do not pressure the person to confront anyone or take part in mediation. Consider safety, seriousness, the person's wishes and any difference in authority. See **Section 1, Early resolution**, and seek HR advice where the route is unclear.

A patient, relative, visitor or contractor is involved

Support the person affected and consider whether immediate action is needed to keep people safe.

Sexual harassment by a patient, relative, visitor, contractor or other third party should be considered under the **Sexual Harassment Guide**. Where the behaviour also involves work-related abuse, threats or assault, the **Work-related Violence and Aggression Policy** and local incident arrangements may apply.

Where the Work-related Violence and Aggression Policy applies, managers and supervisors must:

- Record and manage the incident through the approved process
- Make sure the incident is investigated under the relevant arrangements
- Carry out or review the relevant risk assessment
- Implement or review safe systems of work
- Make sure staff at risk receive appropriate information, instruction and training
- Support affected staff practically and emotionally
- Monitor whether preventative measures remain effective
- Advise and support staff where reporting a serious incident to Police Scotland may be appropriate.

Record the incident through the **NHSGGC Incident Management System** and follow any other local reporting requirements. Recording incidents helps the organisation understand and learn from what happened, identify risks and improve preventative measures. The current NHSGGC Incident Management System is Datix.

The concern is about another manager

Do not send the person back to the manager concerned.

Explain the alternative advice, support and reporting routes.

If the person asks for complete confidentiality

Explain that information will be kept confidential as far as possible, but may need to be shared to obtain advice, manage risk or meet a legal, professional or safeguarding responsibility.

Share only what is needed with people who need to know. See **Section 4**.

You witnessed the behaviour

Do not assume that the person affected must raise the concern alone. A witness can support the person to raise the concern or seek advice about raising it on the person's behalf.

Consider the person's wishes, any immediate or wider risk and the appropriate reporting route.

Consider whether you can:

- Challenge the behaviour safely
- Check whether the person needs support
- Record what you observed
- Seek advice
- Raise a wider preventative concern.

Do not tell the person affected what they must do next.

The person does not want formal action

- Listen to what the person wants and explain the options
- Consider whether there are immediate or wider risks that may still need to be addressed
- Seek advice before deciding what action is required
- Do not promise that no action will be taken before the circumstances and risks have been considered.

If there may be a qualifying disclosure, safeguarding concern or serious risk to others, seek advice about any action that may still be required. Do not tell the person that the concern is definitely protected, or not protected, under whistleblowing law.

The disclosure concerns gender-based violence outside work

Do not automatically use the Bullying and Harassment Policy. Use the **Gender-based Violence Policy** and its guide for managers.

Respond sensitively, consider workplace risk and support, and provide information about reporting and specialist services if the person wants it. See **Section 1, Gender-based violence**.

Special leave

NHSGGC has published an **explicit statement** on special leave for staff affected by gender-based violence, including domestic abuse, sexual harassment, stalking and sexual violence. Staff may request special leave under the **Once for Scotland Special Leave Policy** to seek support, attend appointments, access legal or medical assistance, or take steps towards safety and recovery.

Requests are considered by managers under the policy and should be handled with compassion, discretion and respect for privacy.

There may be an immediate danger or a criminal offence

Prioritise immediate safety and use the emergency arrangements for the setting.

Where the behaviour may amount to a criminal offence:

- Explain the person's right to report the matter to Police Scotland
- Help the person access appropriate advice and support
- Do not carry out a criminal investigation
- Do not pressure the person to make a particular decision
- Preserve relevant information or evidence and seek advice on how it should be handled.

Where the **Work-related Violence and Aggression Policy** applies, make sure the person receives appropriate advice and support if they are considering reporting a serious incident to Police Scotland.

6. Fairness

Taking a concern seriously does not mean deciding the outcome before the facts have been considered.

The following people must be treated fairly and with respect:

- The person raising the concern
- The person complained about
- Witnesses
- Anyone formally supporting those involved.

Information should be shared only with people who need it to provide advice, manage risk, offer support or follow the relevant process.

Managers should avoid:

- Taking sides
- Reaching an early conclusion
- Making promises about the outcome
- Sharing personal views about anyone involved
- Allowing informal discussion or speculation within the team.

Fairness does not mean that everyone will receive the same information or support. Information should be limited to what each person needs for their role in the process.

7. Advice and support

Managers and staff are not expected to deal with sexual harassment alone.

HR advice and formal options

HR Support and Advice Unit

HR Self Service Portal

Telephone: **0141 278 2700**, **option 2**

Bullying and Harassment Helpline

Telephone: **0141 201 8545**

Support and Advice Directory

Support will depend on the person's needs and circumstances. The services below provide different types of advice, representation, wellbeing support and specialist help.

If you need...	Contact
To raise a concern about wrongdoing, patient safety, working conditions or workplace culture.	**NHSGGC Speak Up!**
Advice if you believe that you or a colleague has experienced bullying or harassment.	**Bullying and Harassment Helpline**
Guidance on HR policies, terms and conditions, casework or other employment matters.	**HR Support and Advice Unit**
Advice, support or representation from a workplace representative.	**Trade Union or Professional Organisation**
Peer support to help you make sense of a difficult or distressing experience.	**Peer Support Network**
Confidential, inclusive emotional, spiritual or bereavement support, regardless of faith or belief.	**Spiritual Care Service**
Specialist advice and support relating to health, wellbeing or work.	**Occupational Health Service**
Information and resources about respectful workplace behaviour and how incivility affects staff, teams and patient care.	**Civility Saves Lives**
NHS healthcare following rape or sexual assault, including access to a forensic medical examination where appropriate.	**NHS Scotland Sexual Assault Response Co-ordination Service (SARCS)**

If you need...	Spiritual Care Service
Confidential support relating to domestic abuse or forced marriage, including support for family members, friends, colleagues and professionals.	**Scotland's Domestic Abuse and Forced Marriage Helpline**
Free, confidential and culturally sensitive support for Muslim and Minority Ethnic women, including support relating to domestic abuse.	**Amina - The Muslim Women's Resource Centre**
Confidential information, emotional support, safety planning and refuge support for women, children and young people affected by domestic abuse.	**Glasgow Women's Aid**
Guidance on assessing workplace risk where stalking or continuing harassment is reported.	**Stalking and Harassment Risk Assessment Resources**
Advice on managing risks involving work-related violence, aggression or staff safety.	**Violence Reduction Service, Health and Safety**
Information about asking Police Scotland whether someone has a history of domestic abuse.	**Disclosure Scheme for Domestic Abuse Scotland**
Confidential support for anyone aged 13 or over affected by sexual violence, including people supporting them.	**Rape Crisis Scotland**

Cut It Out and Equally Safe at Work hub

The **Cut It Out and Equally Safe at Work** hub brings together current policies, manager and staff guidance, learning, information on raising concerns and internal and external support. It is an information and signposting resource, not an emergency service or formal reporting route.

Where someone may be at immediate risk, use the appropriate emergency, safeguarding or incident process.

Scan here

8. Manager and Supervisor Checklist

This checklist is designed as a standalone A4 tool. Managers and supervisors can save, print and make notes when reviewing preparedness within their service or team. It should be revisited regularly and after any relevant incident, operational change or learning.

NHS Greater Glasgow and Clyde

Preventing Sexual Harassment at Work

Manager and Supervisor Checklist

Service/team: Date reviewed:

Completed by: Next review date:

	Expected standards of behaviour have been discussed with the team.
	Foreseeable risks, including risks involving third parties, have been considered through existing risk arrangements.
	Relevant risk assessments, safe systems of work and preventative measures are current.
	Advice, reporting and support routes are visible and accessible, including for staff without routine digital access.
	Relevant learning has been promoted. Where training is mandatory, arrangements are in place for relevant staff to complete it.
	I know how to respond if someone raises a concern and where to seek advice.
	I will maintain confidentiality, explain its limits and share information only on a need-to-know basis.
	I will not promise a particular process, outcome or timescale before advice has been obtained.
	I know which workforce policy, safeguarding arrangement, incident process or whistleblowing route may apply.

	I know when early resolution may be inappropriate and will not pressure anyone to confront another person or take part in mediation.
	I understand that a disclosure may qualify for whistleblowing protection and will seek advice rather than decide its legal status myself.
	I will not treat someone unfavourably because they raised or supported a concern.
	If I receive a formal written complaint under the Bullying and Harassment Policy, I will acknowledge it within seven calendar days and follow the current policy documentation.
	I will tell the employee about the right to be accompanied or represented in line with the relevant workforce policy process.
	I will follow the Workforce Policies Investigation Process where an investigation is required.
	Relevant incidents, actions, decisions and reviews are recorded through the correct process.

Actions or notes:

9. Policies, Law and Guidance

This guide should be read alongside the current versions of:

- **NHS Scotland Bullying and Harassment Policy, including the manager guide, employee guides** and **policy flowchart**
- **NHS Scotland Gender-based Violence Policy and guides for managers and employees**
- **NHS Scotland Sexual Harassment Guide**
- **NHS Scotland Work-related Violence and Aggression Policy** and guides for managers and employees
- **NHS Scotland Conduct Policy**
- **NHS Scotland Workforce Policies Investigation Process**
- **NHS Scotland Workforce Policies Investigation Process: Information Sharing Protocol**
- **NHSGGC Speak Up! resource pack for staff and managers**
- **NHSGGC Incident Management System**
- **NHSGGC Cut It Out and Equally Safe at Work (ESaW) programme information**
- **Employment Rights Act 2025 provisions on sexual harassment**
- **Acas guidance on preventing sexual harassment**
- **Acas guidance on third-party harassment**
- **EHRC technical guidance on sexual harassment and harassment at work**
- **EHRC employer eight-step guide and action-plan resources**
- **GOV.UK factsheet on whistleblowing and sexual harassment**.

Employment law, national guidance and commencement arrangements may change. Check current official sources when reviewing or updating this guide.

NHS Scotland workforce policies and their supporting documents form part of the Once for Scotland standards.

If this guide differs from a current NHS Scotland policy or supporting document, the national document takes precedence.

Preventing Sexual Harassment at Work: Guide for Managers and Supervisors

Approval: Cut It Out and Equally Safe at Work Programme Board and relevant Senior Management Team

Published: October 2026

Review: Review this guide if employment law, national guidance, an NHSScotland workforce policy, or NHSGGC reporting, risk, safeguarding, support or learning arrangements change.

This guide supports managers and supervisors to apply relevant law, NHS Scotland workforce policies, supporting documents and approved local arrangements. It does not create a separate policy, reporting route, investigation process or mandatory learning requirement.

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