

Senedd Cymru

Y Pwyllgor Safonau Ymddygiad

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RC02

Ymateb gan: Comisiwn Cydraddoldeb a Hawliau Dynol

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Welsh Parliament

Standards of Conduct Committee

[Review of the Code of Conduct for Members of the Senedd](#)

RC02

Evidence from: Equality and Human Rights Commission

Hannah Blythyn MS, Chair
Welsh Parliament Standards of Conduct Committee
By email only
Seneddstandards@Senedd.wales.

Monday 12 January 2026

Dear Hannah Blythyn MS,

Subject: Code of Conduct Review - Proposals for amendment

About the EHRC

The Equality and Human Rights Commission (EHRC) is the equality regulator for Great Britain and the National Human Rights Institution for Wales and England, and for reserved matters in Scotland. We promote and enforce compliance with the Equality Act 2010, including the Public Sector Equality Duty (PSED).

We have a statutory mandate to advise government, Parliament and public authorities on matters relating to equality.

Standards of Conduct Committee Proposal Four – New Rule, that Members should act as responsible employers

The Equality and Human Rights Commission (the Commission) agrees that Members play an important role as employers, in ensuring dignity, respect, and a healthy working environment within the Senedd.

We would like to draw to the attention of the Standards of Conduct Committee (the Committee) the following points for consideration when reviewing proposal four:

Issues of sexual harassment, race and sex discrimination in Wales pose a



significant challenge, as does the changing legislative and policy landscape. The new legal duty on employers to take reasonable steps to prevent sexual harassment in the workplace and the forthcoming changes in the UK Government's [Employment Bill](#) are placing additional requirements on all employers which will help ensure they foster workplaces free from discrimination, harassment and victimisation, including sexual harassment.

In the guidance for this rule, we recommend the Committee add links to the Commission's [Sexual Harassment and harassment at work: technical guidance](#). This guidance covers sexual harassment, harassment and victimisation in employment under the work provisions in the Equality Act 2010 ('the Act'). The work provisions are based on the principle that workers should not be harassed, discriminated or victimised at work (**Part 5 of the Act**).

This guidance also covers an employer's positive legal duty to take reasonable steps to prevent sexual harassment of its workers (the 'preventative duty').

The Commission's [8 step guide for employers to prevent sexual harassment at work](#) contains practical steps that illustrate the types of action employers can take to prevent and deal with sexual harassment in the workplace. These steps

Bydd y Comisiwn yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg.

The Commission welcomes correspondence in Welsh or English.

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are not an exhaustive list, but implementing these steps should help employers take positive action to prevent and deal with sexual harassment at work.

As employers, Members will need to comply with the [Worker Protection \(Amendment of the Equality Act 2010\) Act 2023](#).

Although Senedd Members as employers are not bound by the obligations to demonstrate compliance with the three aims of the [Public Sector Equality Duty \('PSED'\) general duty](#) and specific duties for Wales, we would advise the Committee that Members are encouraged to operate within the spirit of the PSED. The specific duties assist Welsh public bodies to comply with the general duty to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010 ('the Act').
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

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We would further advise that Members ensure that they and their employees have access to comprehensive, appropriate and regular training including in the subject areas highlighted above.

Yours sincerely,

Rev Ruth Coombs
Head of Wales

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