

FLAXTON PARISH COUNCIL
SEXUAL HARASSMENT PREVENTION DUTY
POLICY

17th September 2026

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1. Purpose

Flaxton Parish Council is committed to providing a working environment in which all councillors, employees, contractors, volunteers and other individuals who work with or for the Council are treated with dignity and respect.

The Council has zero tolerance for sexual harassment and will take reasonable steps to prevent sexual harassment of its employees and other workers in the course of their work.

This policy sets out the Council's approach to:

- preventing sexual harassment;
- identifying and addressing risks of sexual harassment;
- responding appropriately to concerns and complaints;
- supporting anyone who experiences or witnesses sexual harassment; and
- ensuring that councillors, employees and others understand their responsibilities.

The policy should be read alongside the Council's **Dignity at Work Policy, Grievance Procedure, Disciplinary Procedure, Equality and Diversity Policy and Code of Conduct**, where applicable.

2. Policy statement

Flaxton Parish Council is committed to preventing sexual harassment and creating a workplace and Council environment in which everyone is treated with dignity and respect.

The Council will take reasonable and proportionate steps to prevent sexual harassment, respond appropriately when concerns arise, and continually review its arrangements to ensure that they remain effective.

3. Scope

This policy applies to sexual harassment involving:

- employees and workers of the Parish Council;
- councillors when interacting with employees, workers or other individuals on Council business;
- contractors and consultants;
- volunteers;
- agency workers;
- applicants for employment; and
- other individuals attending or participating in Council activities where the conduct is connected with Council business.

The policy applies to conduct occurring:

- in Council offices and workplaces;
- at meetings and Council events;
- during work-related travel;
- at social events connected with the Council;
- by telephone, email, messaging services and social media;
- during remote or hybrid working; and
- in any other circumstances where the conduct is connected with work for or on behalf of the Council.

4. What is sexual harassment?

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Sexual harassment can be a one-off incident or repeated behaviour. The fact that someone did not object at the time does not necessarily mean that the conduct was welcome.

Examples may include:

- making sexual comments, jokes or remarks;
- making comments about someone's body, appearance, clothing or sexuality;
- unwanted sexual advances or propositions;
- asking intrusive questions about someone's sex life;
- displaying or sharing sexually explicit material;
- sending sexually suggestive emails, messages, images or social media content;
- making sexual gestures or suggestive noises;
- unwanted touching, physical contact or other physical behaviour of a sexual nature;
- making comments or jokes about sexual orientation or gender;
- discussing sexual matters in an inappropriate workplace setting;
- repeatedly asking someone for a date after they have indicated that they are not interested; or
- engaging in other unwanted conduct of a sexual nature.

Sexual harassment may occur regardless of the sex or gender of the person responsible or the person experiencing the conduct.

5. Third-party sexual harassment

The Council recognises that employees may experience sexual harassment from people who are not employed by the Council, including members of the public, contractors, visitors, suppliers or others attending Council premises or meetings.

Where there is a risk of third-party sexual harassment, the Council will take reasonable steps to prevent it and will respond appropriately when concerns are raised.

Such steps may include:

- providing clear standards of behaviour to visitors and contractors;
- displaying appropriate notices;
- addressing inappropriate behaviour promptly;
- reviewing meeting arrangements where risks have been identified;
- providing support to affected employees;
- considering whether additional staff or councillor presence is appropriate; and
- reviewing the risk assessment following an incident.

6. Responsibilities of the Parish Council

The Parish Council will take reasonable steps to prevent sexual harassment.

The Council will:

1. assess the risks of sexual harassment occurring in the workplace and in connection with Council activities;
2. consider particular circumstances and activities where risks may be higher;

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3. put appropriate preventative measures in place;
4. provide appropriate information and training;
5. communicate expected standards of behaviour clearly;
6. review this policy and associated risk assessments regularly;
7. take concerns seriously and respond promptly and appropriately;
8. protect individuals from retaliation for raising genuine concerns;
9. investigate allegations where appropriate; and
10. take appropriate action where sexual harassment is established.

The Council will keep appropriate records of concerns, incidents, training and preventative measures, subject to data protection requirements.

7. Risk assessment

The Council will consider the risk of sexual harassment as part of its workplace health, safety and employment arrangements.

Risk assessments should consider, where relevant:

- the nature of employees' roles;
- lone working;
- working with members of the public;
- public meetings and parish events;
- evening or weekend activities;
- alcohol being available at Council-related events;
- working relationships involving councillors and employees;
- power imbalances or positions of authority;
- remote and digital communication;
- previous complaints or incidents;
- environments in which inappropriate behaviour may be more difficult to challenge; and
- any other circumstances identified by employees, councillors or management.

Risk assessments will be reviewed following significant incidents or changes to working arrangements and otherwise periodically as appropriate.

8. Preventative measures

Depending on the risks identified, the Council may implement measures including:

- providing sexual harassment prevention training;
- training councillors and employees on expected standards of behaviour;
- ensuring employees know how to report concerns;
- providing clear procedures for dealing with complaints;
- setting appropriate standards for Council meetings and events;
- ensuring employees can raise concerns without fear of retaliation;
- monitoring relevant incidents and complaints;
- reviewing working arrangements where risks are identified;
- taking appropriate action against perpetrators; and
- providing information to contractors, volunteers and other relevant third parties.

Preventative measures will be proportionate to the size and resources of the Council and the risks identified.

9. Standards of behaviour

Everyone covered by this policy is expected to:

- treat others with dignity and respect;
- maintain appropriate professional boundaries;
- avoid unwanted sexual comments, conduct or contact;
- respect personal boundaries;
- avoid inappropriate jokes, images or messages;
- challenge inappropriate behaviour where it is safe and appropriate to do so; and
- report concerns where appropriate.

Being under the influence of alcohol or another substance is not an excuse for sexual harassment.

10. Reporting a concern

Anyone who experiences or witnesses sexual harassment is encouraged to report the matter as soon as reasonably practicable.

A concern may be raised with:

- the Parish Clerk;
- the Chair of the Parish Council;
- another designated senior councillor; or
- another appropriate person identified by the Council.

Where the concern relates to the Clerk or Chair, an alternative reporting route should be available.

A person raising a concern does not have to use the formal grievance procedure initially. The Council will consider whether an informal approach, formal investigation or another response is appropriate.

Where appropriate, individuals may be encouraged to keep a record of relevant incidents, including dates, locations, witnesses and communications.

11. Responding to complaints

The Council will respond to concerns sensitively, promptly and fairly.

The response may include:

- speaking confidentially with the person raising the concern;
- taking immediate steps to protect the individual from further inappropriate behaviour;
- gathering relevant information;
- conducting a formal investigation;
- applying the Council's grievance or disciplinary procedures;
- addressing conduct by a councillor through the appropriate Council or Code of Conduct process;
- taking action in relation to contractors, volunteers or members of the public where appropriate; and
- reviewing the relevant risk assessment and preventative measures.

Confidentiality will be maintained as far as reasonably practicable. However, information may need to be shared where necessary to investigate a complaint, protect individuals or comply with legal obligations.

12. Malicious or vexatious complaints

The Council recognises that making a complaint can be difficult and will not take action against someone simply because a complaint cannot be substantiated.

However, deliberately making a false or malicious allegation may constitute misconduct and may be dealt with under the appropriate Council procedure.

13. Protection from victimisation

The Council will not tolerate victimisation or retaliation against anyone who:

- raises a genuine concern;
- makes a complaint;
- assists with an investigation;
- provides evidence or information; or
- supports another person who has raised a concern.

Any such behaviour may itself result in disciplinary or other appropriate action.

14. Councillors

Councillors are expected to maintain high standards of conduct and to treat Council employees, fellow councillors, contractors, volunteers and members of the public with dignity and respect.

Councillors must not use their position or authority to engage in sexual harassment or other inappropriate conduct.

Where an allegation concerns a councillor, the Council will consider the appropriate procedure, which may include the Council's Code of Conduct arrangements and, where appropriate, referral to the relevant Monitoring Officer or other competent authority.

The Council will seek to ensure that employees are not disadvantaged because they raise a concern about the behaviour of a councillor.

15. Training and awareness

The Council will provide appropriate information and training on sexual harassment prevention.

Training should cover:

- what sexual harassment is;
- examples of inappropriate conduct;
- the Council's standards of behaviour;
- how to report concerns;
- how complaints will be handled;
- responsibilities of councillors and employees;
- third-party harassment;
- bystander intervention; and
- the importance of preventing retaliation.

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Training will be refreshed periodically and when significant changes in law, guidance or Council arrangements occur.

16. Support

The Council will signpost appropriate support to anyone affected by sexual harassment.

Depending on circumstances, this may include:

- access to an appropriate workplace contact;
- occupational health or employee assistance arrangements, where available;
- external support organisations;
- trade union or professional representation, where applicable; and
- appropriate workplace adjustments.

The Council recognises that sexual harassment can have a significant impact on an individual's wellbeing and will seek to respond sensitively.

17. Data protection and record keeping

Personal information relating to complaints and investigations will be handled confidentially and in accordance with applicable data protection legislation.

Records will only be retained for as long as reasonably necessary and will be accessed only by those who need the information for legitimate Council purposes.

The Council may maintain anonymised or aggregated information to identify trends and assess whether further preventative action is required.

18. Monitoring and review

The Council will periodically review:

- reported incidents and concerns;
- risk assessments;
- preventative measures;
- training completion;
- feedback from employees and councillors; and
- the effectiveness of this policy.

Where incidents or concerns indicate that preventative measures have not been effective, the Council will consider what further reasonable steps should be taken.

This policy will be formally reviewed at least every [12/24] months or sooner where required by changes in legislation, guidance or circumstances.

19. Related documents

This policy should be read alongside:

- Equality and Diversity Policy;
- Grievance Procedure;
- Disciplinary Procedure;