

	<p style="text-align: center;"><b>Sexual Harassment Policy</b></p> <p style="text-align: center;">Lytchett Minster and Upton Town Council LMUTC/SH/Pol18/V2Sept22</p> <p><b>Approved by Town Council: August 2021</b>  <b>Date last reviewed: 4 March 2025</b>  <b>Date of next review: March 2027</b></p>
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## 1. INTRODUCTION

Lytchett Minster & Upton Town Council believes that civility and respect are important in the working environment, and expect all councillors, officers and the public to be polite and courteous when working for, and with the council.

We are committed to creating a working environment where all council employees, councillors, contractors and others who come into contact with us in the course of our work, are treated with dignity, respect and courtesy. We aim to create a workplace where there is zero tolerance for harassment and bullying.

In support of this objective, the Town Council has signed up to the Civility Pledge, as a commitment to civility and respect in our work, and politeness and courtesy in behaviour, speech, and in the written word. Further information about the Civility and Respect Pledge is available [NALC](#) & [SLCC](#).

We recognise that sexual harassment can occur both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media.

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, effective from 26 October 2024, the council has a duty to take reasonable steps to prevent sexual harassment in the workplace. This includes:

- Implementing preventive measures such as regular training and clear communication of this policy.
- Creating a culture of respect and inclusion.
- Taking proactive steps to identify and mitigate risks of sexual harassment.

As an employer, we recognise the importance of taking steps to do our utmost to prevent sexual harassment and victimisation of all staff, in accordance with the law. Therefore, we will take active steps to assess our working practices, in an attempt to anticipate how conduct amounting to sexual harassment may occur within our workplace, with the aim of helping to prevent the sexual harassment and victimisation of all staff.

Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support.

Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us or are a third party outside of our control.

This policy applies to all staff of the Council, and applies in all settings, whether that be in person, online, or during any work-related social events, business events or trips etc.

This policy will cover all areas of the business including any overseas sites, subject to any applicable local laws.

The Council will commit to review this policy at regular intervals, to ensure that the policy remains effective for the Council's needs, and up to date in line with any legal changes.

## **2. SCOPE OF POLICY**

This policy covers sexual harassment of and by clerks and all employees engaged to work at Lytchett Minster & Upton Town Council. Should third parties (agency staff, contractors, volunteers) have a complaint connected to their engagement with the Town Council this should be raised to their nominated contact, manager, or the Chair of the Council, in the first instance. Should the complaint be about the Chair of the Council the complaint should be raised to Town Clerk.

Agency staff, contractors and volunteers are equally expected to treat council colleagues, and other representatives and stakeholders with dignity and respect, and the council may terminate the contract, without notice, where there are suspicions of harassment or bullying. Third-party harassment will not be tolerated, and the law requires employers to take reasonable steps to prevent sexual harassment by third-parties. Workers are encouraged to report third-party harassment and whilst an individual cannot bring a claim for third-party harassment alone, it can still result in legal liability when raised in other types of claims.

Complaints about other employment matters will be managed under the Council's grievance policy.

This policy should be read in conjunction with other Council policies and procedures including

- Bullying and Harassment Policy
- Dignity at Work Policy
- Equal Opportunities Policy
- Disciplinary Procedure
- Grievance Procedure
- Lone Working Policy

## **3. WHAT IS SEXUAL HARASSMENT?**

The Equality Act 2010 defines sexual harassment as unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. This definition covers a wide range of behaviours, including:

- Unwelcome sexual advances
- Inappropriate touching
- Sexual jokes or comments
- Displaying sexually explicit images
- Any other conduct of a sexual nature that fits the criteria above.

Set out below are some examples of different circumstances where sexual harassment has occurred:

### **Example 1**

The conduct need not be sexually motivated, only sexual in nature:

*A male worker alters a pornographic image by pasting an image of his female colleague's face on to it. He then sends it to their other colleagues, causing them to ridicule her. There was no sexual motivation behind this act, but the use of the image is sexual in nature.*

### **Example 2**

Sexual interaction that is invited, mutual or consensual is not sexual harassment because it is not unwanted. However, sexual conduct that has been welcomed in the past can become unwanted:

*A female worker has a brief sexual relationship with her supervisor. The worker tells her supervisor that she thinks it was a mistake and does not want the relationship to continue. The next day, the supervisor grabs the worker's bottom, saying 'Come on, stop playing hard to get'. Although the original sexual relationship was consensual, the supervisor's conduct after the relationship ended is unwanted conduct of a sexual nature.*

### **Example 3**

The worker is treated less favourably because they were submitted to or rejected the unwanted conduct

*In the previous example, the worker responds to the supervisor's behaviour by saying, 'Get off me, I'm not playing hard to get!' After that, the supervisor starts to make things more difficult for the worker, giving her more work to do than others and being more critical of her work. The supervisor is treating the worker less favourably because she rejected his unwanted conduct. Under this type of harassment, it may be the same person who is responsible for the initial unwanted conduct and the subsequent less favourable treatment, or it may be two (or more) different people*

### **Example 4**

*Continuing with the previous example, the supervisor informs his line manager, who he is friendly with, about his rejection by the worker, the line manager feels sorry for the supervisor, thinking that the worker 'led him on'. When the worker applies for a promotion, the line manager rejects her application, saying that 'she can't be trusted'. This opinion is based on her rejection of the supervisor. The line manager's actions also amount to less favourable treatment because of the worker's rejection of the supervisor's unwanted conduct.*

## **4. WHAT IS VICTIMISATION?**

Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

- Bringing proceedings under the Equality Act 2010.
- Giving evidence or information in connection with proceedings under the Equality Act 2010.
- Doing any other thing for the purposes of or in connection with the Equality Act 2010.
- Alleging that a person has contravened the Equality Act 2010.

Victimisation may include, for example:

- Denying someone an opportunity because it is suspected that they intend to make a

complaint about sexual harassment.

- Excluding someone because they have raised a grievance about sexual harassment.
- Failing to promote someone because they accompanied another staff member to a grievance meeting.
- Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.

## 5. WHAT IS THIRD PARTY HARASSMENT?

Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, unwelcome sexual advances from a client, customer or supplier visiting the employer's premises, or where a person is visiting a client, customer or supplier's premises or other location in the course of their employment.

The law requires employers to take reasonable steps to prevent sexual harassment by third parties as well as any staff employed or otherwise engaged by the Council, and so like with our internal expectations of staff, this policy is equally applicable to any third party we work with, and we hold any third-party to the same high standards concerning our stance on sexual harassment.

We will take active steps to try to prevent third-party sexual harassment of staff. These may include warning notices to customers or recorded messages at the beginning of telephone calls.

If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. These may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police.

Similarly, any sexual harassment by a member of staff against a third party will be investigated and may lead to disciplinary action up to and including dismissal.

## 6. HOW CAN I RAISE A CONCERN / COMPLAIN ABOUT SEXUAL HARASSMENT?

**What you should do if you feel you are being bullied or harassed by a member of the public or supplier (as opposed to a colleague):** If you are being bullied or harassed by someone with whom you come into contact at work, please raise this with your Line Manager in the first instance or, with the Town Clerk. Any such report will be taken seriously, and we will decide how best to deal with the situation, in consultation with you.

**What you should do if you feel you are being bullied or harassed by a councillor:** If you are being bullied or harassed by a councillor, please raise this with the Town Clerk or the Chair of the Council in the first instance. They will then decide how best to deal with the situation, in consultation with you. There are two possible avenues for you, informal or formal.

The Informal Resolution is described below. Formal concerns regarding potential breaches of the Councillors Code of Conduct must be investigated by the Monitoring Officer.

The council will consider reasonable measures to protect your health and safety. Such measures may include a temporary change in duties or change of work location, not attending meetings with the person about whom the complaint has been made etc.

**What you should do if you witness an incident you believe to be harassment or bullying:** If you witness such behaviour, you should report the incident in confidence to the Town Clerk or a councillor. Such reports will be taken seriously and will be treated in strict confidence as far as it is possible to do so.

**What you should do if you are being bullied or harassed by another member of staff:**

If you are being bullied or harassed by a colleague or contractor, there are two possible avenues for you, informal or formal. These are described below.

**Informal resolution**

If you are being bullied or harassed, you may be able to resolve the situation yourself by explaining clearly to the perpetrator(s) that their behaviour is unacceptable, contrary to the council's policy and must stop. Alternatively, you may wish to ask the Town Clerk, your Line Manager or a colleague to put this on your behalf or to be with you when confronting the perpetrator(s).

If the above approach does not work or if you do not want to try to resolve the situation in this way, or if you are being bullied by your own Line Manager, you should raise the issue with the Chair of the Council. If your concern relates to the Chair, you should raise it with the Town Clerk who will discuss with you the option of trying to resolve the situation informally by telling the alleged perpetrator, without prejudicing the matter, that:

- there has been a complaint that their behaviour is having an adverse effect on a member of the council staff
- such behaviour is contrary to our policy
- for employees, the continuation of such behaviour could amount to a serious disciplinary offence

It may be possible for this conversation to take place with the alleged perpetrator without revealing your name, if this is what you want. The person dealing with it will also stress that the conversation is confidential.

In certain circumstances we may be able to involve a neutral third party (a mediator) to facilitate a resolution of the problem. The Chair (or another appropriate person) will discuss this with you if it is appropriate.

If your complaint is resolved informally, the alleged perpetrator(s) will not usually be subject to disciplinary sanctions. However, in exceptional circumstances (such as an extremely serious allegation or in cases where a problem has happened before) we may decide to investigate further and take more formal action notwithstanding that you raised the matter informally. We will consult with you before taking this step.

**Raising a formal complaint**

If informal resolution is unsuccessful or inappropriate, you can make a formal complaint about bullying and harassment through the council's grievance procedure. You should raise your complaint to the Town Clerk or the Chair of the Council. A formal complaint may ultimately lead to disciplinary action against the perpetrator(s) where they are employed.

The Town Clerk or the Chair of the Council will appoint someone to investigate your complaint in line with the grievance policy. You will need to co-operate with the investigation and provide the following details (if not already provided):

- The name of the alleged perpetrator(s),
- The nature of the harassment or bullying,
- The dates and times the harassment or bullying occurred,
- The names of any witnesses and
- Any action taken by you to resolve the matter informally.

The alleged perpetrator(s) would normally need to be told your name and the details of your grievance in order for the issue to be investigated properly. However, we will carry out the investigation as confidentially and sensitively as possible. Where you and the alleged perpetrator(s) work in proximity to each other, we will consider whether it is appropriate to make temporary adjustments to working arrangements whilst the matter is being investigated.

Where your complaint relates to potential breaches of the Councillors Code of Conduct, these will need to be investigated by the Monitoring Officer. The council will consider any adjustments to support you in your work and to manage the relationship with the councillor the allegations relate to, while the investigation proceeds.

Investigations will be carried out promptly (without unreasonable delay), sensitively and, as far as possible, confidentially. When carrying out any investigations, we will ensure that individuals' personal data is handled in accordance with the data protection policy.

The council will consider how to protect your health and wellbeing whilst the investigation is taking place and discuss this with you.

Depending on the nature of the allegations, the Investigator may want to meet with you to understand better your complaint (see the grievance policy for further information, and details of your right to be accompanied).

After the investigation, a panel will meet with you to consider the complaint and the findings of the investigation in accordance with the grievance procedure. At the meeting you may be accompanied by a fellow worker or a trade union official.

Following the conclusion of the hearing the panel will write to you to inform you of the decision and to notify you of your right to appeal if you are dissatisfied with the outcome. You should put your appeal in writing explaining the reasons why you are dissatisfied with the decision. Your appeal will be heard under the appeal process that is described in the grievance procedure.

If you believe you have been subjected to sexual harassment in any form, whether that be by a colleague or a third party, or likewise you have witnessed sexual harassment of another, then you are strongly urged to report this. This will enable investigation, and allow for any necessary action to be taken, whilst providing support as necessary.

We operate an open-door policy meaning in the event you wish to raise an issue or complaint concerning sexual harassment, you should have confidence that all managers are there to talk to and provide support. Regardless of a manager's position or seniority, you are encouraged to speak to whichever individual you feel most comfortable raising this with and who you deem most appropriate to speak to bearing in mind your circumstances, whether this be your direct line manager, or another manager, or Town Clerk.

## **7. PROTECTING CONFIDENTIALITY**

We will treat any complaint of sexual harassment in confidence, as far as is possible, and if we find that you have been the victim of sexual harassment, we will take steps to stop it continuing or recurring.

As a general principle, the decision whether to progress a complaint is up to you, however, we have a duty of care to all staff, and therefore in instances where a complaint of sexual harassment is raised informally or in confidence, in line with our duty of care principles, we may be obligated to investigate this anyway (especially if this is very serious conduct), to ensure such conduct is eradicated. We will however discuss this with you and factor in all circumstances.

Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint, and the person accused will only be disclosed on a "need to know" basis.

Breach of confidentiality may give rise to disciplinary action under our Disciplinary Policy. If you make a harassment or bullying complaint and don't maintain proper confidentiality at any time

during the process, or you are interviewed in connection with someone else's complaint and likewise fail to maintain confidentiality, you may face action under our Disciplinary Policy.

When appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and any measures put in place to prevent a similar event happening again.

## **Lytchett Minster & Upton Town Council Risk Assessment – Preventing Sexual Harassment**

### Purpose

The aim of this risk assessment is to prevent sexual harassment during the course of employment. It considers the potential risks to all employees and workers, as well as third parties who are engaged with us to carry out services such as those who are self-employed and agency workers.

Carrying out this assessment will allow us to identify, assess and mitigate risks associated with sexual harassment in the workplace and will help to create a safe and respectful working environment and promote a positive workplace culture. It also supports the Council's compliance with its legal obligation of taking reasonable steps to prevent sexual harassment from occurring in the course of employment.

This assessment is kept under continuous review to ensure existing prevention measures remain adequate. Reviews will take place at least annually, with ad-hoc reviews taking place where circumstances require. This could be if there is a change to the demographics of the workforce or working arrangements, or where we have received complaints of sexual harassment taking place. An assessment of the risks will be carried out for each of our business locations. An action plan will then be created and monitored on the back of this risk assessment.

The Council encourages all employees and workers to inform their Line Manager of areas in which they believe sexual harassment protection could be further improved.

### Level of risk

The level of risk is determined by considering both the likelihood of the hazard occurring and the severity of its potential consequences.

- **Low risk:** Indicates that the likelihood of the hazard occurring is rare and the potential consequences are minimal.
- **Medium risk:** Indicates that the likelihood of the hazard occurring is moderate and the potential consequences could result in sexual harassment occurring.
- **High risk:** Indicates that the hazard is likely to occur and could result in sexual harassment taking place. This level of risk requires immediate attention and action to eliminate or substantially reduce it.



**Lytchett Minster & Upton Town Council risk assessment for the prevention of sexual harassment during the course of employment**

<b>Risk assessment owner:</b>	Karen Cane (Town Clerk)
<b>Assessment date:</b>	03.02.2025
<b>Assessment carried out by:</b>	Karen Cane (Town Clerk) and Kate Osborne (Deputy Town Clerk)
<b>Work location:</b>	Lytchett Minster & Upton Town Hall
<b>Next scheduled assessment date:</b>	01.02.2026
<b>Version number:</b>	1

**Potential hazards, risks and proposed actions in prevention**

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
Workforce demographics:									
Is anyone required to work at night?	Y		Limited supervision or support as fewer people working at night.	Staff working late at council meetings.	L			(1) The Council has adopted a robust Harassment Policy that explicitly	Ongoing.  Included as part of

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
								<p>addresses sexual harassment. This policy includes clear examples of sexual harassment, and a comprehensive reporting procedure. The policy is accessible to all staff and Members via the Council website.</p> <p>(2) Conduct regular check-ins with individual employees to ensure their wellbeing and help identify any potential issues.</p> <p>(3) Consider the implementation of safety measures, such as panic buttons or CCTV cameras, which may serve as deterrents and provide a sense of security.</p> <p>(4) Make efforts to ensure that there are always two members of staff on duty whenever possible.</p>	<p>induction training for new employees and reinforced to all employees at regular staff meetings and when there are updates or changes to legislation.</p> <p>Check-ins with staff as soon as practicably possible following occasions of working late.</p>

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
Are there lone workers or people working in isolated workplaces?		N							
Is there anyone who works with just one other employee/worker?	Y		Vulnerability, no third-party presence/witness.	Staff who work together on the Town Outside Operations Team (OOT) may face increased risks of sexual harassment due to limited supervision or support.		M		<p>(1) The Council has adopted a robust Harassment Policy that explicitly addresses sexual harassment. This policy includes clear examples of sexual harassment, and a comprehensive reporting procedure. The policy is accessible to all staff and Members via the Council website.</p> <p>(2) Conduct regular check-ins with individual employees to ensure their wellbeing and help identify any potential issues.</p> <p>(3) Provide comprehensive training to staff and Members on recognising and reporting sexual harassment, bystander intervention and the consequences of</p>	<p>Ongoing.</p> <p>Included as part of induction training for new employees and reinforced to all employees at regular staff meetings and when there are updates or changes in legislation.</p> <p>Daily morning briefings with OOT team members.</p> <p>Sexual Harassment training to</p>

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
								sexual harassment. This training should focus on creating a supporting environment and empowering staff to speak up.	be implemented June 2025.
Do your employees/workers interact with third parties, e.g. contractors or members of the public?	Y		Not bound by code of conduct, sending sexually explicit emails.	Staff who regularly come into contact with suppliers, contractors or members of the public may be more vulnerable to sexual harassment due to a higher frequency of interactions.	L			<p>(1) The council has adopted a robust Harassment Policy that explicitly addresses third party sexual harassment. The policy is accessible to all staff &amp; Members via the council's website.</p> <p>(2) Provide comprehensive training to staff and Members on recognising and reporting sexual harassment, bystander intervention and the consequences of sexual harassment. This training should also cover how to handle difficult interactions with third parties, setting boundaries, and</p>	<p>Ongoing.</p> <p>Included as part of induction training for new employees/ Members and reinforced to all employees at regular staff meetings and when there are updates or changes in legislation.</p> <p>Sexual Harassment training to be</p>

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
								<p>empowering individuals to remove themselves from difficult situations.</p> <p>(3) Provide additional training for managers to ensure that they are able to support individuals who have been subjected to harassment by a third party and their role in preventing and stopping bullying and harassment from occurring in the workplace.</p> <p>(4) Ensure that the organisation's zero tolerance approach to sexual harassment is communicated to third parties via email and notices displayed in public areas of the workplace.</p>	<p>implemented June 2025.</p> <p>Additional training for Line Managers to be implemented June 2025.</p> <p>Emails to third parties sent upon first instance of engaging their services.</p> <p>Notices to be displayed in public areas by end of March 2025.</p>
Do any of your employees/workers work alone with a third party?	Y		Vulnerability, no third-party presence, witness. Not bound by code of conduct.	Staff who regularly work alone with a third party may be more vulnerable to sexual harassment.	L			<p>(1) The council has adopted a robust Harassment Policy that explicitly addresses third party sexual harassment. The policy is</p>	<p>Ongoing.</p> <p>Included as part of induction training for new</p>

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
								<p>accessible to all staff via the council's website.</p> <p>(2) Provide comprehensive training to staff/Members on recognising and reporting sexual harassment, covering how to handle difficult interactions with third parties, setting boundaries, and empowering individuals to remove themselves from difficult situations.</p>	<p>employees and reinforced to all employees/ Members at regular staff meetings and when there are updates or changes in legislation.</p> <p>Sexual Harassment training to be implemented June 2025.</p>
Do you require your employees/workers to attend the workplace of a third party or attend offsite locations?	Y		There may not be a robust Harassment Policy in place and third party employees may not have received sexual harassment training. Employees/workers attending the workplace of a third party, or attend offsite locations,	Staff who regularly attend the workplace of a third party or attend offsite locations.	L			<p>(1) Provide comprehensive training to staff/Members on recognising and reporting sexual harassment, covering how to handle difficult interactions with third parties, setting boundaries, and empowering individuals to remove</p>	<p>Ongoing.</p> <p>Sexual Harassment training to be implemented June 2025. Will then be included as part of induction training for new</p>

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
			may not know who they can report sexual harassment to on-site.					themselves from difficult situations.	Employees/ Members and reinforced to all employees at regular staff meetings and when there are updates or changes in legislation.
Are members of staff expected to socialise with third parties, e.g. at events or conferences with contractors or clients?	Y		Contractors or clients may not be trained in recognising sexual harassment and may not be bound by a Code of Conduct. Alcohol consumption can impair judgement and lower inhibitions, potentially leading individuals to	Staff attending civic events.		M		<p>(1) The Council has adopted a robust Harassment Policy that explicitly addresses sexual harassment. This policy includes clear examples of sexual harassment, and a comprehensive reporting procedure.</p> <p>(2) Ensure there is appropriate supervision and adequate staffing levels to monitor and address any potential incidents of sexual harassment promptly.</p>	<p>Ongoing.</p> <p>Included as part of induction training for new employees/ members and reinforced to all employees at regular staff meetings, and ahead of attendance at events or conferences</p>

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
			behave in ways that they would not in a sober state.					(3) Reinforce relevant policies leading up to these events to remind staff/members and attendees about the importance of ensuring a safe environment, free from discrimination, bullying or harassment.	with contractors or clients.
Do employees/workers attend offsite events?	Y		There may not be a robust Anti-harassment Policy in place, lack of training, unclear lines of reporting, presence of alcohol.	Staff attending offsite events.	L			(1) The Council has adopted a robust Harassment Policy that explicitly addresses sexual harassment. This policy includes clear examples of sexual harassment, and a comprehensive reporting procedure. (2) Reinforce relevant policies leading up to these events to remind staff/members and attendees about the importance of ensuring a safe environment, free from discrimination,	Ongoing.  Included as part of induction training for new employees/members and reinforced to all employees at regular staff meetings, and ahead of attendance at events or conferences with



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								bullying or harassment.	contractors or clients.
Are there any employees or workers who travel and work abroad?		N							
Are there high pressured, competitive or stressful environments within your organisation?	Y		Pressure and stress can create strong reactions, polarise opinions and create division in the workplace/council meetings. In such environments, individuals may feel compelled to assert their beliefs forcefully, sometimes leading to harassment or hostile behaviour towards those in the workplace/council meeting with differing perspectives.	Staff who are in subordinate positions may be at higher risk of experiencing sexual harassment. This is because the power imbalances that exist in such in such relationships can create opportunities for exploitation. It may also be more difficult for individuals in these subordinate positions to speak up due to fear of negative consequences or retaliation.	L			(1) The Council has adopted a robust Harassment Policy. This policy includes clear examples of sexual harassment and a comprehensive reporting procedure. The policy contains multiple reporting channels to ensure that staff can safely report incidents of sexual harassment, even if the harasser is in a position of power. The inclusion of multiple reporting channels ensures impartiality and protection against negative consequences or retaliation. The policy is accessible to all	Ongoing.  Included as part of induction training for new employees/ members and reinforced to all employees/ members at regular staff meetings and when there are updates or changes in legislation.

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
								Staff/members via the council website.	
Is there a higher representation of one gender in your workplace?		N							
Are there areas of power imbalances in the workplace?		N							
<b>Vulnerable employees and workers:</b> Evidence shows that vulnerable employees and workers can be exposed to greater risk from harassment than those who are not. In this section, assess the risk of those groups that are relevant to your workplace:									
Women	Y		Women may feel marginalised if leadership and managers lack diversity. The power imbalance may make them more susceptible to sexual harassment and less empowered to speak up owing to fear of retaliation.		L			(1) The council has adopted a robust Harassment Policy. This policy includes clear examples of sexual harassment and a comprehensive reporting procedure. The policy contains multiple reporting channels to ensure that staff can safely report incidents of sexual harassment, even if the harasser is in a position of power. The inclusion of multiple reporting	Ongoing.  Included as part of induction training for new employees/ members and reinforced to all employees at regular staff/council meetings and when there are updates or

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
								channels ensures impartiality and protection against negative consequences or retaliation. (2) The council has also adopted an Equality, Diversity and Inclusion Policy. Both policies are accessible to all staff/members via the council website.	changes in legislation.
LGBTQ+	Y		LGBTQ+ employees may feel marginalised which may make them more susceptible to sexual harassment and less empowered to speak up owing to fear of retaliation.		L			(1) The council has adopted a robust Harassment Policy. This policy includes clear examples of sexual harassment and a comprehensive reporting procedure. The policy contains multiple reporting channels to ensure that staff can safely report incidents of sexual harassment, even if the harasser is in a position of power. The inclusion of multiple reporting	Ongoing.  Included as part of induction training for new employees/ members and reinforced to all employees at regular staff/council meetings and when there are updates or

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								channels ensures impartiality and protection against negative consequences or retaliation. (2) The council has also adopted an Equality, Diversity and Inclusion Policy. Both policies are accessible to all staff/members via the council website.	changes in legislation.
Young workers		N							
Someone with a disability (mental or physical)	Y		Employees with a mental or physical disability may feel marginalised which may make them more susceptible to sexual harassment and less empowered to speak up owing to fear of retaliation.					(1) The council has adopted a robust Harassment Policy. This policy includes clear examples of sexual harassment and a comprehensive reporting procedure. The policy contains multiple reporting channels to ensure that staff can safely report incidents of sexual harassment, even if the harasser is in a position of power. The inclusion	Ongoing.  Included as part of induction training for new employees/ members and reinforced to all employees at regular staff/council meetings and when there are updates or

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								of multiple reporting channels ensures impartiality and protection against negative consequences or retaliation. (2) The council has also adopted an Equality, Diversity and Inclusion Policy. Both policies are accessible to all staff/members via the council website.	changes in legislation.
Black and minority ethnic workers		N							
Non-UK nationals, including those who may not be confident in making a complaint in English or for whom English is not their first language		N							
Low-paid earners		N							
Home workers	Y		May be exposed to online harassment that it not visible to others.	Staff working online at home where there is no supervision.	L			(1) The Council has adopted a robust Harassment Policy that explicitly addresses sexual harassment. This policy includes clear examples of sexual	Ongoing.  Included as part of induction training for new employees /members

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
								harassment, and a comprehensive reporting procedure.	and reinforced to all employees at regular staff/council meetings and when there are updates or changes in legislation.
Lone workers		N							
Agency workers		N							
Casual workers		N							
Those on fixed term or zero-hour contracts		N							
<b>Policy:</b>									
Do you have a clearly written harassment policy that deals with the prevention of sexual harassment?	Y								
Do you address third-party harassment in your policy and take reasonable steps to prevent it?	Y								

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
Is your anti-harassment policy easily accessible to all employees?	Y								
Do you re-circulate your policy or remind staff members of where and how to access the policy on a regular basis, including when changes are made?	Y								
Do you regularly review, monitor and update your harassment policy?	Y								
In your disciplinary policy, do you specify that sexual harassment is considered a potential act of gross misconduct and could lead to someone's summary dismissal?	Y								
Do policies on the use of IT communication systems and social media include appropriate warnings against online harassment, and how to report concerns?	Y								
Do you have policies regarding proper use of	Y								

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
social media platforms such as LinkedIn, Facebook, Instagram or X?									
Is there a policy for workplace relationships?		N							
Do your anti-harassment policies align to all other company policies such as homeworking, lone working, and equality, diversity and inclusion (EDI)?	Y								
<b>Training:</b>									
Do you carry out Equality, Diversity & Inclusion (EDI) training that covers sexual harassment as part of the induction/onboarding process?		N	A workplace culture that tolerates certain attitudes, inappropriate behaviours and stereotypical views where employees are not treated with dignity and respect may make staff more vulnerable to sexual harassment.	Staff and councillors				(1) Provide comprehensive EDI training that covers sexual harassment.	Training to be implemented June 2025. Will then be included as part of induction training for new employees/ members and reinforced to all employees at regular



Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
									Staff/coun cil meetings and when there are updates or changes in legislation.
Do you carry out EDI training that covers sexual harassment on an annual basis?		N	A workplace culture that tolerates certain attitudes, inappropriate behaviours and stereotypical views where employees are not treated with dignity and respect may make staff more vulnerable to sexual harassment.	Staff and councillors	L			(1) Provide comprehensive EDI training that covers sexual harassment.	Training to be implemented June 2025. Will then be included as part of induction training for new employees and reinforced to all employees/ Members at regular staff/council meetings and when there are updates or changes in legislation.
Do you provide separate training to line managers (to that which is given to		N	A workplace culture that tolerates certain attitudes, inappropriate	Staff who are in subordinate positions	L			(1) Provide comprehensive EDI	Training to be implemented June 2025.

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
employees and workers)?			behaviours and stereotypical views where employees are not treated with dignity and respect may make staff more vulnerable to sexual harassment.					training that covers sexual harassment.	Will then be included as part of induction training for new employees/ members and reinforced to all employees/ members at regular staff/council meetings.
Do you provide Equality, Diversity and Inclusion (EDI) training that is specific to your workplace and that uses case studies or scenarios that relate to your organisation?		N	A workplace culture that tolerates certain attitudes, inappropriate behaviours and stereotypical views where employees are not treated with dignity and respect may make staff more vulnerable to sexual harassment.	Staff and councillors	L			(1) Provide comprehensive EDI training that covers sexual harassment.	Training to be implemented June 2025. Will then be included as part of induction training for new employees/ members and reinforced to all employees/ members at regular staff/council meetings.

Do you provide refresher EDI training		N	A workplace culture that tolerates	Staff and councillors	L			(1) Provide comprehensive EDI	Training to be
Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
when circumstances warrant it, e.g. when there is a change in working arrangements or workforce demographics, or after receiving a complaint of sexual harassment?			certain attitudes, inappropriate behaviours and stereotypical views where employees are not treated with dignity and respect may make staff more vulnerable to sexual harassment.					training that covers sexual harassment.	implemented April 2025. Will then be included as part of induction training for new employees and reinforced to all employees at regular staff meetings.
<b>Working environment:</b>									
Do you have an IT policy that sets the rules for appropriate usage?	Y								
Do you monitor and address inappropriate behaviour on digital platforms?	Y								
Do employees travel abroad for business?		N							
Are there sexualised or sexist materials on display such as calendars or posters?		N							

Is there adequate privacy or security for workers using bathrooms or changing rooms?	Y							
Do you have areas that are isolated or with inadequate lighting or security?		N						

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
codes or expectations for either gender?									
Are workers required to travel and have overnight stays?		N							
Do employees and workers travel to remote locations?		N							
Do you provide accommodation facilities for employees?		N							
Are sexist jokes prevalent in the workplace?		N							
Do workers engage with social drinking on site?		N							
Do you have high staff turnover, particularly of female workers, young workers, or low-paid earners?		N							

Have you been informed that some workers are more reluctant to work with certain workers or take on certain tasks?		N							
Is alcohol consumed, either by staff or third parties, whilst staff are working?		N							

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		

			potentially leading individuals to behave in ways that they would not in a sober state.	more vulnerable to sexual harassment.				<p>supervision and adequate staffing levels at events where alcohol is available to monitor and address any potential incidents of sexual harassment promptly.</p> <p>(3) Designate specific staff members as points of contact for individuals to report concerns or seek assistance.</p> <p>(4) Reinforce relevant policies leading up to these events to remind staff and attendees about the importance of ensuring a safe environment, free from discrimination, bullying or harassment.</p>	<p>part of induction training for new employee/member, reinforced to all employees/members at regular staff/council meetings, and further reinforced ahead of any such occasions.</p>
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**Outside of the workplace:**

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
Do staff socialise outside of the workplace?	Y		Outside of the workplace there may be fewer inhibitions, potentially leading individuals to behave in ways that they would not in work.	Staff socialising outside of the workplace may be more vulnerable to sexual harassment.	L			(1) Reinforce relevant policies to remind staff about the importance of ensuring a safe environment, free from discrimination, bullying or harassment.	Ongoing.  Reinforce at regular staff meetings and when there are any updates or changes to legislation.
Is alcohol available at social events?	Y		Alcohol consumption can impair judgement and lower inhibitions, potentially leading individuals to behave in ways that they would not in a sober state.	Staff attending work-related social events/conferences where alcohol is consumed may be more vulnerable to sexual harassment.		M		(1) Reinforce relevant policies to remind staff about the importance of ensuring a safe environment, free from discrimination, bullying or harassment.	Ongoing.  Reinforce at regular staff meetings and when there are any updates or changes to legislation.
Do you undertake background or reference checks for all workers and other people engaged at your workplace such as contractors?		N							
Do you issue employee communications in advance of workplace events?		N							

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
Complaint handling:									
Do you have clear and effective procedures for receiving and responding to complaints of sexual harassment?	Y							(1) The council has adopted a robust Harassment Policy that explicitly addresses sexual harassment. This policy includes clear examples of sexual harassment and a comprehensive reporting procedure. The policy contains multiple reporting channels to ensure that staff can safely report incidents of sexual harassment, even if the harasser is in a position of power. The inclusion of multiple reporting channels ensures impartiality and protection against negative consequences or retaliation. The policy is accessible to all staff/members via the council's website.	Ongoing.  Included as part of induction training for new employees/ members and reinforced to all employees/ members at regular staff/council meetings and when there are updates or changes in legislation.



Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
Are there multiple, confidential ways for employees to report harassment?	Y								
Are your workers able to access management who are outside of their direct reporting line?	Y								
Is your workforce so small that confidentiality and confidence to raise issues may be difficult to achieve?		N							
Have there been previous cases of harassment?		N							
Are line managers consistent at, and do they enforce, disciplinary and grievance policies?	Y								
Do you ensure prompt, thorough and impartial investigations of sexual harassment complaints?	Y							(1) The council has adopted a robust Harassment Policy that explicitly addresses sexual harassment. This policy includes clear examples of sexual harassment and a comprehensive reporting procedure.	Ongoing.  Included as part of induction training for new employees/members and reinforced to all

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
								<p>The policy contains multiple reporting channels to ensure that staff can safely report incidents of sexual harassment, even if the harasser is in a position of power. The inclusion of multiple reporting channels ensures impartiality and protection against negative consequences or retaliation. The policy is accessible to all staff via the council's website.</p> <p>(2) Ensure managers involved in handling sexual harassment complaints are given appropriate training to address the complexities of cases involving power imbalances and the need to be independent and not influenced by any conflicts of interests.</p>	Employees /members at regular staff/council meetings and when there are updates or changes in legislation.

Considerations	Yes	No	Hazard	Who might be harmed	Level of risk			Preventative action	Date completed
					Low	Med	High		
Are there support systems in place for victims of sexual harassment such as counselling services, or employee assistance programmes?	Y							Access to Occupational Health at Dorset Council. Upon request, staff can be referred to an independent counsellor (registered practitioner with British Association for Counselling and Psychotherapy) for work related issues.	Ongoing.  Certified 30 April 2024 for 3 years. Refresher course due April 2027.
Do staff report a culture of banter or casual sexism which is hard to challenge?		N							
Do you audit your work practices to ensure they continue to remain fit for purpose and prevent sexual harassment?	Y								

## **Lytchett Minster & Upton Town Council Action Plan – Preventing Sexual Harassment**

### Purpose

The key purpose of this action plan is to prevent sexual harassment from occurring during the course of employment. The activities listed within it have all been identified through the completion of a risk assessment which considered all of our working practices, including our policies and procedures.

A further aim of this action plan is to strengthen relevant employment policies and reporting mechanisms and to foster a workplace culture of responsibility and awareness, all of which are fundamental in preventing sexual harassment.

By implementing the actions that have been identified through the risk assessment process, it supports the Town Council's compliance with its legal obligations.

Please also refer to our template **Lytchett Minster & Upton Town Council Risk Assessment – Preventing Sexual Harassment**.

### Monitoring

The monitoring of the action plan is fundamental in the prevention of sexual harassment. It enables the tracking of progress, detects any issues early, provides meaningful data to aid decision making, facilitates accountability and transparency, and allows for continuous improvement, all of which will lead to the successful implementation of each action point and therefore remove, or significantly lower, the risk of sexual harassment occurring.

## Lytchett Minster & Upton Town Council action plan for the prevention of sexual harassment during the course of employment

<b>Action plan owner:</b>	Karen Cane (Town Clerk)
<b>Action plan date:</b>	10.02.2025
<b>Work location:</b>	Lytchett Minster & Upton Town Hall
<b>Date of risk assessment this action plan aligns with:</b>	03.02.2025
<b>Next scheduled risk assessment date:</b>	10.02.2026
<b>Version number:</b>	1

### Action plan for the prevention of sexual harassment during the course of employment

<b>Risk assessment result</b>	<b>Activity</b>	<b>Responsible</b>	<b>Resources (people, budget, time)</b>	<b>Time frame for completion</b>	<b>Monitoring</b>
All employees/members/workers aware of the Town Council's policies on the prevention of sexual harassment and response mechanisms.	<ul style="list-style-type: none"> <li>• Line management training</li> <li>• Employee training</li> <li>• Part of the induction process</li> <li>• Members training</li> </ul>	Line Manager	Annual training – next scheduled for June 2025	Training of the entire workforce and Council members, carried out June 2025	Update training log accordingly

Staff working late at council meetings.	<ul style="list-style-type: none"> <li>• Late working approved by Line Managers</li> <li>• Line managers check in with staff</li> <li>• Staff report concerns</li> </ul>	Line Manager	All employees	Ongoing	Follow up with relevant staff after each occasion of late working
Staff working with just one other employee.	<ul style="list-style-type: none"> <li>• Provide comprehensive training to staff on recognising and reporting sexual harassment, bystander intervention and the consequences of sexual harassment. This training should focus on creating a supporting environment and empowering staff to speak up</li> <li>• Conduct regular check-</li> </ul>	Line Manager	Annual training – next scheduled for June 2025	Training of the entire workforce, circa 7 employees, carried out June 2025	Update training log accordingly

	ins with individual employees to ensure their wellbeing and help identify any potential issues				
Ensure Line Managers are able to support individuals who have been subjected to harassment.	<ul style="list-style-type: none"> <li>• Provide additional training for Line Managers</li> </ul>	Line Managers	Annual training – next scheduled for June 2025	Training of Line Managers carried out June 2025	Update training log accordingly
Ensure that the Town Council's zero tolerance approach to sexual harassment is communicated.	<ul style="list-style-type: none"> <li>• Email to be sent to third parties</li> <li>• Zero tolerance notices displayed in public areas</li> </ul>	Managers	Managers	<p>Emails sent as and when third party approved</p> <p>Notices to be displayed by end of March 2025</p>	<p>Keep record of third parties notified of zero tolerance approach</p> <p>Regularly check notices are still in place</p>
Ensure decisions are representative of all employees	<ul style="list-style-type: none"> <li>• Engage staff in decision making process where appropriate</li> </ul>	Managers	All employees	As and when	Seek feedback from staff through satisfaction surveys

