



Redgrave Parish Council

Sexual and General Harassment Policy & Procedure

Policy Statement

Redgrave Parish Council (RPC) is committed to providing a working environment in which all individuals are treated with dignity and respect. Harassment or bullying of any kind will not be tolerated. This policy ensures compliance with the Equality Act 2010, the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and proper practices set out under SAPPP 2025. It also aligns with the National Association of Local Councils (NALC) model employment policies (2023–2024).

This policy aims to prevent harassment and provide clear procedures for addressing any concerns raised by councillors, staff, or members of the public in connection with RPC activities.

Definitions

Harassment is unwanted conduct related to a relevant protected characteristic (as defined under the Equality Act 2010) that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. This includes, but is not limited to, conduct based on gender, race, disability, religion, age, or sexual orientation.

Bullying (or personal harassment) is offensive, intimidating, malicious, or insulting behaviour, or abuse of power that undermines, humiliates, or injures the recipient.

Sexual harassment includes unwanted conduct of a sexual nature such as unwelcome physical contact, sexual comments, jokes, or propositions.

Examples of such unacceptable behaviour are provided at Appendix 1 to this policy.

Scope

This policy applies to all councillors, employees, contractors, and volunteers of RPC. It also applies to interactions between councillors, staff, and members of the public during the conduct of RPC business.

Policy Principles

- All individuals have the right to be treated with dignity and respect.
- Allegations will be taken seriously, investigated promptly, and handled confidentially.
- Retaliation or victimisation of anyone raising a concern is strictly prohibited.
- Complaints will be resolved at the lowest possible level, where appropriate, but formal procedures are available if necessary.

Informal Procedure

Where possible, individuals who feel they are being harassed or bullied should first make it clear to the person responsible that their behaviour is unwelcome and must stop. If the individual feels unable to do so directly, they may seek advice or support from the Parish Clerk or Chair.

An informal resolution may include facilitated discussion or mediation where appropriate. No formal record will be kept at this stage other than a confidential note of the concern.

Formal Procedure

If informal resolution is not appropriate or fails to resolve the issue, a formal complaint should be submitted in writing to the Parish Clerk. Where the Clerk is the subject of the complaint, the complaint should be directed to the Chair.

Upon receipt of a formal complaint, an investigation will be initiated within ten working days. The complainant and respondent will be informed of the process, expected timescales, and outcomes. Investigations will be carried out confidentially, fairly, and impartially.

On receipt of a formal complaint, we will take action to separate the complainant from the alleged harasser to enable an uninterrupted investigation to take place.

The complainant may be invited to attend a meeting, at a reasonable time and location, to discuss the matter once the person hearing the grievance has had opportunity to read the report. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

The complainant will be able to put their case forward at the meeting and the manager will explain the outcome of the investigation. The complainant has a right to appeal the outcome, which is to be made to the Parish Clerk within 10 days of receiving the outcome.

The Organisation is committed to ensuring employees are not discouraged from using this procedure and no employee will be victimised for having brought a complaint.

Following investigation, the RPC may take disciplinary or corrective action where the complaint is upheld. The complainant will be informed in writing of the decision.

Confidentiality and Data Protection

All personal data collected in connection with a harassment or bullying complaint will be processed lawfully under Article 6(1)(e) UK GDPR (performance of a public task) and kept confidential.

Information will be shared only with those who need to know to investigate and resolve the matter.

Records of complaints and investigations will be retained securely and in accordance with the RPC's Document Control and Records Management Policy. They will be kept no longer than necessary and then securely destroyed.

Information relating to such complaints is exempt from disclosure under the Freedom of Information

Act 2000, except where required by law or with the consent of the parties involved.

Responsibilities

The Parish Clerk is responsible for administering this policy and ensuring that all complaints are handled promptly and fairly. The Chair will oversee investigations where appropriate. Councillors and employees are expected to act as role models and promote a culture of dignity and respect.

Transparency and Publication

This policy will be published on the RPC's website as part of its governance and employment framework. It will be reviewed annually to ensure ongoing compliance with SAPPP 2025 and the Local Government Transparency Code 2015.

Anonymised summaries of complaints (where appropriate) may be used to demonstrate learning and improvement without compromising confidentiality.

Governance and Review

This policy forms part of the RPC's governance and risk management framework and will be reviewed annually or sooner if legislation or SAPPP guidance changes. Compliance with this policy will be confirmed within the Annual Governance and Accountability Return (AGAR) under Section 1, Assertion 5 (Risk Management).

This policy should be read in conjunction with the RPC's Grievance Policy, Disciplinary Policy, and Data Protection Policy.

Examples of Unacceptable Sexual and General Harassment

The following examples of unacceptable behaviour in terms of this policy are as follows:

Examples of Personal Harassment

Personal harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Personal harassment is unwanted behaviour by one employee towards another, and examples of harassment include:

- insensitive jokes and pranks
- lewd or abusive comments
- deliberate exclusion from conversations
- displaying abusive or offensive writing or material
- abusive, threatening or insulting words or behaviour
- name-calling
- picking on someone or setting them up to fail
- exclusion or victimisation
- undermining their contribution/position
- demanding a greater work output than is reasonably feasible
- blocking promotion or other development/advancement.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment.

Examples of Sexual Harassment

Sexual harassment can take place in many forms within the workplace and can go undetected for a period where employees do not understand that a particular behaviour is classed as sexual harassment. Sexual harassment is unwanted behaviour related to sex, or of a sexual nature, by one employee towards another and examples of sexual harassment include:

- lewd or abusive comments of a sexual nature such as regarding an individual's appearance or body
- unwelcome touching of a sexual nature
- displaying sexually suggestive or sexually offensive writing or material
- asking questions of a sexual nature
- sexual propositions or advances, whether made in writing or verbally.

Sexual harassment can also take place where an employee is treated less favourably because they have rejected, or submitted to, the unwanted conduct that is related to sex or is of a sexual nature. Whether less favourable treatment occurs as a result will be examined broadly and includes areas such as blocking promotion and refusal of training opportunities or other development opportunities.

Examples of Victimisation

Victimisation takes place when an employee is treated unfavourably as a direct result of raising a genuine complaint of discrimination or harassment. Furthermore, any employee who supports or assists another employee to raise a complaint is also subjected to victimisation if they are treated unfavourably.

Third-party Harassment

The Organisation operates a zero-tolerance policy in relation to harassment perpetrated against one of its employees by a third party, such as a client/customer or visitor to the Organisation. All employees are encouraged to report all instances of harassment that involve a third party in line with our reporting procedure, as outlined below.

If we find that the allegation is well-founded, we will take steps we deem necessary to remedy this complaint. This can include, but is not limited to:

- warning the individual about the inappropriate nature of their behaviour
- banning the individual from Organisation premises
- reporting the individual's actions to the police.

In addition to this, the Organisation will endeavour to take all reasonable steps to deter and prevent any form of harassment from third parties taking place.