



PRESTATYN TOWN COUNCIL

Civility, Respect & Dignity at Work Policy 2026

DRAFT

VERSION UPDATES

Version	Date	Section	Details of Change
V1D1	19.09.2023	Whole of Document	First Draft
V1D2	26.06.2025	Whole of Document	Edited; no significant change
V2(a)	20.02.2026	Code of Conduct for Officers	Code of Conduct for officers included
V2(b)	29.05.2026	Throughout and Adherence.	Reference to Anti-Harassment Policy added. 'Adherence' for Code of Conduct added.
V2.1	15.07.26	Minor changes, versioning and spelling.	

APPROVALS AND DISTRIBUTION

Version	Date	Meeting	Reference
V2(a)	03.03.2026	Policy Review Sub-Committee	Agenda item 2
V2.1	15.07.26	Minor changes, versioning and spelling.	
V2.1	16.07.26	Policy Review Sub Committee	
V2.1	09.09.26	Full Council	

Signature: _____

Date: _____

Contents

VERSION UPDATES	1
APPROVALS AND DISTRIBUTION	1
INTRODUCTION	3
PURPOSE.....	3
SCOPE	3
BULLYING AND HARRASSMENT	4
What Type of Treatment Amounts to Bullying or Harassment?.....	5
VICTIMISATION	6
CODE OF CONDUCT FOR OFFICERS	7
ADHERENCE.....	7
10. Disclosure of Personal Interests	10
11. Prejudicial Interests	10
12. Participation in Relation to Disclosed Interests.....	11
13. Registration of Interests	11
14. Registration of Gifts and Hospitality.....	11
APPENDIX 1: EMPLOYEE INFORMATION FOR REPORTING CONCERNS	12

INTRODUCTION

Prestatyn Town Council (PTC) believes that civility, respect and dignity 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.

PURPOSE

PTC is committed to creating a working environment where all council employees, councillors, contractors and others who encounter the council in the course of their work, are treated with dignity, respect and courtesy. PTC aims to create a workplace where there is zero tolerance for harassment and bullying.

In support of this objective, PTC has signed up to the Civility Pledge as a commitment to civility and respect; and politeness and courtesy in behaviour, speech and the written word.

PTC recognises that there is a continuum where unaddressed issues have the potential to escalate and become larger, more complex issues. This policy sets out how concerns will be managed; however, the emphasis of this policy is on resolution and mediation where appropriate rather than an adversarial process.

This document:

- Explains how PTC will respond to complaints of bullying or harassment
- Ensures that PTC responds sensitively and promptly
- Supports PTC employees in ensuring that their behaviour does not amount to bullying and/or harassment by giving examples

SCOPE

This policy covers bullying and harassment relating to PTC and its agents and should be adhered to in agreement with PTC's 2026 Anti-Harassment Policy. Should agency staff or contractors have a complaint connected to their engagement with PTC, this should be raised through their nominated contact or PTC's Formal Complaints Policy 2026.

Agency staff and contractors are expected to treat council colleagues, along with other representatives and stakeholders, with dignity and respect. The council may terminate the contract, without notice, where there are suspicions of harassment or bullying.

Complaints about employment matters will be managed under the council's grievance and disciplinary policies.

It is noted that the management of a situation may differ depending on whom the allegations relate to (e.g. employee, contractor, councillor), however, the council will take appropriate action if any of its employees are bullied or harassed by anyone.

BULLYING AND HARRASSMENT

All staff and council representatives are entitled to dignity, respect and courtesy within the workplace and to not experience any form of discrimination. PTC will not tolerate bullying or harassment in its workplace or at work-related events outside of the workplace, regardless of whether the conduct is a one-off act or repeated course of conduct and whether harm is intended or not. Retaliation against, or victimisation of, any person involved in bringing a complaint of harassment or bullying will also not be tolerated.

Bulling and harassment may in some circumstances amount to a crime punishable by a fine or imprisonment.

PTC expects all representatives of the council to treat each other with respect and uphold the values of the Code of Conduct, Civility and Respect Pledge, Equal Opportunities Policy, 2026 Anti-Harassment Policy and all other policies and procedures as set by the council.

PTC expects all representatives of the council to demonstrate respect by listening and paying attention to others, having consideration for others, following protocols and policies, and showing appreciation and thanks.

Allegations of bullying and harassment will be treated seriously. Investigations will be carried out promptly, sensitively and, as far as possible, confidentially. See the Grievance Policy for further details regarding the process. Employees and others who make allegations of bullying or harassment in good faith will not be treated less favourably as a result.

False accusations of harassment or bullying can have a serious effect on innocent individuals. Staff and others have a responsibility not to make false allegations. While PTC will assume that all complaints of bullying and harassment are made in good faith, in the event that allegations are found to be malicious or vexatious the person raising the complaint may be subject to action under the council's disciplinary procedure.

What Type of Treatment Amounts to Bullying or Harassment?

Harassment

- Where a person is subject to uninvited conduct that violates their dignity, in connection with a protected characteristic
- Behaviour that creates a hostile, humiliating, degrading or similarly offensive environment in relation to a protected characteristic

Bullying

- Behaviour that leaves the victim feeling threatened, intimidated, humiliated, vulnerable or otherwise upset. It does not need to be connected to a protected characteristic.

For sexual harassment, see PTC's separate policy: Anti-Harassment Policy.

Bullying and harassment can occur through verbal and face to face interactions but can also take place through sharing inappropriate or offensive content in writing or via email and other electronic communications and social media.

It is important to recognise that conduct which one person may find acceptable, another may find totally unacceptable, and behaviour could be harassment when the person had no intention to offend. We all have the right to determine what offends us. Some behaviour will be clear to any reasonable person that it is likely to offend – for example sexual touching. Other examples may be less clear; however, you should be aware that harassment will occur if behaviour continues after the recipient has advised you that the behaviour is unacceptable to them.

Harassment can also occur where the unwanted behaviour relates to a perceived characteristic (such as offensive jokes or comments based on the assumption someone is gay, even if they are not) or due to their association with someone else (such as harassment related to their partner having a disability for example). See the council's Equal Opportunities Policy.

'Bullying' or 'harassment' are phrases that apply to treatment from one person (or a group of people) to another, which is unwanted and that has the effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

All employees must, therefore, treat their colleagues with respect and appropriate sensitivity and should feel able to challenge behaviour that they find offensive even if it is not directed at them.

Examples of bullying and harassment include:

- Physical conduct ranging from unwelcome touching to serious assault
- Unwelcome sexual advances
- The offer of rewards for going along with sexual advances e.g. promotion, access to training
- Threats for rejecting sexual advances
- Demeaning comments about a person's appearance
- Verbal abuse or offensive comments, including jokes or pranks related to age, disability, gender re-assignment, marriage, civil partnership, pregnancy, maternity, race, religion, belief, sex or sexual orientation
- Unwanted nicknames, especially related to a person's age, disability, gender re-assignment, marriage, civil partnership, pregnancy, maternity, race, religion, belief, sex or sexual orientation
- Spreading malicious rumours or insulting someone
- Lewd or suggestive comments or gestures
- Deliberate exclusion from conversations, work activities or social activities.
- Withholding information, a person needs in order to do their job
- Practical jokes, initiation ceremonies or inappropriate birthday rituals
- Physical abuse such as hitting, pushing or jostling
- Rifling through, hiding or damaging personal property
- Display of pictures or objects with sexual or racial overtones, even if not directed at any particular person
- Isolation or non-cooperation at work
- Subjecting a person to humiliation or ridicule, belittling their efforts, whether directly and / or in front of others
- The use of obscene gestures
- Abusing a position of power

It is important to recognise that bullying does not include appropriate criticism of an employee's behaviour or effective, robust performance management. Constructive and fair feedback about your behaviour or performance from your manager or colleagues / Councillors is not bullying. It is part of normal employment and management routines and should not be interpreted as anything different.

VICTIMISATION

Victimisation is subjecting a person to a detriment because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them a heavier or more difficult workload.

Provided that an individual acts in good faith, i.e. a genuine belief that something is true, an individual has a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment, and the council will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone involved.

Making an untrue complaint or giving untrue evidence may lead to disciplinary action.

CODE OF CONDUCT FOR OFFICERS

ADHERENCE

This section is a contractual policy. All officers employed by PTC are expected to comply with this code as per their employment contract clause: 'to follow all council procedures and be aware of all council policies...' Workers for PTC are expected to comply with this code as far as the law allows (England & Wales).

1. You must observe this code of conduct:

- a) whenever you conduct the business of the council, work within PTC's offices or within the community while representing the council, or are present at a meeting of the council;
- b) whenever you act, claim to act or give the impression you are acting in the role of an officer of PTC;
- c) whenever you act, claim to act or give the impression you are acting as a representative of PTC; or
- d) at all times and in any capacity, as deemed relevant.

2. Where you are appointed or nominated by PTC to represent the council —

- a) in a group / at a meeting / event or other occasion, or on any other body, which includes a Local Health Board you must, when acting alongside that other authority or body, comply with the code of conduct of that other authority or body; or
- b) on any other body which does not have a code relating to the conduct of its members, you must, when acting alongside that other body, comply with this code of conduct, except and insofar as it conflicts with any other lawful obligations to which that other body may be subject.

3. You must —

- a) carry out your duties and responsibilities with due regard to the principle that there should be equality of opportunity for all people, regardless of their gender, race, disability, sexual orientation, age or religion;
- b) show respect and consideration for others;
- c) not use bullying behaviour or harass any person; and
- d) not do anything which compromises, or which is likely to compromise, the impartiality of those who work for, or on behalf of, PTC.

4. You must not —

- a) disclose confidential information or information which should reasonably be regarded as being of a confidential nature, without the express consent of a person authorised to give such consent, or unless required by law to do so; or
- b) prevent any person from gaining access to information to which that person is entitled by law.

5. You must —

- a) not conduct yourself in a manner which could reasonably be regarded as bringing your office or PTC into disrepute;
- b) report any conduct by colleague or anyone who works for, or on behalf of, PTC which you reasonably believe involves or is likely to involve criminal behaviour (which for the purposes of this paragraph does not include offences or behaviour capable of punishment by way of a fixed penalty);
- c) report to the Town Clerk any conduct by a councillor which you reasonably believe breaches the Councillor Code of Conduct;
- d) not make vexatious, malicious or frivolous complaints against other officers or anyone who works for, or on behalf of, the council;
- e) conduct yourself in a cooperative manner with your fellow officers and manager at all times and act as a productive team member of PTC's staff; and
- f) comply with any request of your authority's monitoring officer, or the Public Services Ombudsman for Wales, in connection with an investigation conducted in accordance with their respective statutory powers.

6. You must not —

- a) in your official capacity or otherwise, use or attempt to use your position improperly to confer on or secure for yourself, or any other person, an advantage or create or avoid for yourself, or any other person, a disadvantage;
- b) use, or authorise others to use, the resources of PTC —
 - i. imprudently;
 - ii. in breach of the council's requirements;
 - iii. unlawfully;
 - iv. other than in a manner which is calculated to facilitate, or to be conducive to, the discharge of the functions of the council or of the office to which you have been appointed;
- c) improperly for political purposes; or
- d) improperly for private purposes.

7. You must —

- a) when participating in meetings or reaching decisions regarding the business of the council, do so on the basis of the merits of the circumstances involved and in the public interest having regard to any relevant advice provided by PTC's officers and Members, in particular by —
 - i. the council's Town Clerk;
 - ii. the Chairs of relevant committees and sub-committees
 - iii. the authority's monitoring officer;
- b) give reasons for all decisions in accordance with any statutory requirements and any reasonable additional requirements imposed by your authority.

8. You must —

- a) observe the law and the PTC's rules governing the claiming of expenses and allowances in connection with your duties as an officer; and
- b) avoid accepting from anyone gifts, hospitality (other than official hospitality, such as a civic reception or a working lunch duly authorised by PTC), material benefits or services for yourself or any person which might place you, or reasonably appear to place you, under an improper obligation.

9. Personal Interests

- a) You must in all matters consider whether you have a personal interest, and whether this code of conduct requires you to disclose that interest.
- b) You must regard yourself as having a personal interest in any business of the council if it relates to, or is likely to affect —
 - i. any employment or business carried on by you;
 - ii. any person who employs or has appointed you, any firm in which you are a partner or any company for which you are a remunerated director;
 - iii. any person, other than PTC, who has made a payment to you in respect of a role, election or any expenses incurred by you in carrying out your duties as an officer;
 - iv. any corporate body which has a place of business or land in PTC's area, and in which you have a beneficial interest;
 - v. any contract for goods, services or works made between PTC and you or a firm in which you are a partner, a company of which you are a remunerated director, or a body of the description specified in sub-paragraph (iv) above;
 - vi. any land in which you have a beneficial interest, and which is in the council's area;
 - vii. anybody to which you have been appointed or nominated to by the council;
 - viii. any company, trade union or professional association, registered society, charity, or body directed to charitable purposes; body whose principal purposes include the influence of public opinion or policy; of which you are a member;
 - ix. any private club, society or association operating within the council's area, in which you have membership or hold a position of general control or management;
 - x. any land in the council's area in which you have a licence (alone or jointly with others) to occupy for 28 days or longer;
- c) You must regard yourself as having a personal interest in a decision upon which it might reasonably be regarded as affecting —
 - i. your well-being or financial position, or that of a person with whom you live, or any person with whom you have a close personal association.

10. Disclosure of Personal Interests

- a) Where you have a personal interest in any business of PTC and you attend a meeting at which that business is considered, you must disclose orally to that meeting the existence and nature of that interest before or at the commencement of that consideration, or when the interest becomes apparent.
- b) Where you have a personal interest in any business of PTC and you make-
 - i. written representations (whether by letter, facsimile or some other form of electronic communication) to a Member or officer of the council regarding that business, you should include details of that interest in the written communication; or
 - ii. oral representations (whether in person or some form of electronic communication) to a Member or officer of the council you should disclose the interest at the commencement of such representations, or when it becomes apparent to you that you have such an interest and confirm the representation and interest in writing within 14 days of the representation.
- c) You must, in respect of a personal interest not previously disclosed, before or immediately after the close of a meeting where the disclosure is made, give written notification to the council, as a minimum containing —
 - i. details of the personal interest;
 - ii. details of the business to which the personal interest relates; and
 - iii. your signature.
- d) Where the information relating to your personal interest is sensitive information, you have an obligation to disclose the existence of a personal interest but may keep the details private.
- e) A personal interest will only be deemed to have been previously disclosed if written notification has been provided.
- f) Where no written notice is provided in accordance with that paragraph you will be deemed as not to have declared a personal interest in accordance with this code.

11. Prejudicial Interests

- a) Where you have a personal interest in any business of your authority you also have a prejudicial interest in that business if the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice your judgement of the public interest.
- b) You **will not be** regarded as having a prejudicial interest in any business where that business relates to —
 - i. another relevant authority of which you are also a member;
 - ii. another public authority or body exercising functions of a public nature in which you hold a position of general control or management;
 - iii. a body to which you have been appointed or nominated by PTC;
 - iv. your role as a member of a Local Health Board where you have not been appointed or nominated by the council;
- c) The exemptions in above do not apply where the business relates to the determination of any approval, consent, licence, permission or registration.

12. Participation in Relation to Disclosed Interests

- a) Where you have a prejudicial interest in any business of PTC you must withdraw from the room, chamber or place where a meeting considering the business is being held—
 - i. whether or not the public are allowed to remain in attendance for such consideration; or
 - ii. in any other case, whenever it becomes apparent that that business is being considered at that meeting;
 - iii. not exercise executive or advisory functions in relation to that business;
 - iv. not seek to influence a decision about that business;
 - v. not make any written representations (whether by letter, facsimile or some other form of electronic communication) in relation to that business; and
 - vi. not make any oral representations (whether in person or some form of electronic communication) in respect of that business or immediately cease to make such oral representations when the prejudicial interest becomes apparent.
- b) Where you have a prejudicial interest in any business of PTC you may attend a meeting but only for the purpose of making representations, answering questions or giving evidence relating to the business, provided that the public are also allowed to attend the meeting for the same purpose, whether under a statutory right or otherwise.
- c) Where you have a prejudicial interest in any business you may submit written representations to a meeting relating to that business, provided that the public are allowed to attend the meeting for the purpose of making representations, answering questions or giving evidence relating to the business, whether under a statutory right or otherwise.
- d) When submitting written representations, you must comply with any procedures that PTC may adopt for the submission of such representations.

13. Registration of Interests

- a) you must register and record personal and prejudicial interests —
 - i. within 7 days of becoming aware of any new interests, register that new interest in PTC's register of interests by providing written notification to the Town Clerk; or
 - ii. within 7 days of becoming aware of any change, register that change in PTC's register of interests by providing written notification to the Town Clerk, or Staffing Sub-Committee.
 - iii. Where you consider that the information relating to any of your personal interests is sensitive information, and the Town Clerk / Staffing Sub-Committee agrees, you need not include that information when registering that interest.
 - iv. In this code, "sensitive information" means information whose availability for inspection by the public creates, or is likely to create, a serious risk that you or a person who lives with you may be subjected to violence or intimidation.

14. Registration of Gifts and Hospitality

- a) You must, within 7 days of receiving any gift, hospitality, material benefit or advantage. provide written notification to the Town Clerk, or Staffing Sub-Committee, of the existence and nature of that gift, hospitality, material benefit or advantage.

APPENDIX 1: EMPLOYEE INFORMATION FOR REPORTING CONCERNS

What to 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 nominated manager in the first instance or, with the clerk or a councillor. Any such report will be taken seriously, and we will decide how best to deal with the situation in consultation with you.

What to 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 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 to 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 in the first instance, or the Staffing Sub-Committee otherwise. Such reports will be taken seriously and will be treated in strict confidence as far as it is possible to do so.

What to do if you are being bullied or harassed by another member of staff

If you believe 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, the Chair of the Council 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 manager, you should raise the issue with the Staffing Sub-Committee. They 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 PTC 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 PTC 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 extremely serious allegation or in cases where a problem has happened before) PTC may decide to investigate further and take more formal action notwithstanding that you raised the matter informally. PTC 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 procedures. You should raise your complaint to the Town Clerk in the first instance or Staffing Sub-Committee otherwise. A formal complaint may lead to disciplinary action against the perpetrator(s) where they are employed. If required, the Resource and Appeals Committee will be called to sit on the matter.

Someone will be appointed to investigate the 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
- 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 for the issue to be investigated properly; however, PTC will carry out the investigation as confidentially and sensitively as possible. Where you and the alleged perpetrator(s) work in proximity to each other, it will be considered 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, the Staffing Sub-Committee or the Resource and Appeals Committee will meet with you to consider the complaint and the findings of the investigation in accordance with the grievance procedures. At the meeting you may be accompanied by a fellow worker or a trade union official.

Following the conclusion of the hearing, you will be informed of the decision and notified 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 as described in the grievance procedures.

Use of the Disciplinary Procedure

If at any stage from the point at which a complaint is raised, it is believed there is a case to answer and a disciplinary offence might have been committed, PTC will instigate the disciplinary procedure. You will be informed of the outcome.

Except where explicitly stated, this is a non-contractual policy which will be reviewed from time to time. All concerned parties will be updated, as needed, to ensure compliance.