



PRESTATYN TOWN COUNCIL

Sexual Harassment: Anti-Harassment Policy & Plan

2026

DRAFT

VERSION UPDATES

Version	Date	Section	Details of Change
V1	03.07.2026	New document	First draft

APPROVALS AND DISTRIBUTION

Version	Date	Meeting	Reference
V1		Policy Review Sub-Committee	

Contents

VERSION UPDATES.....	1
APPROVALS AND DISTRIBUTION	1
INTRODUCTION	3
APPLICABILITY	3
DEFINITION OF SEXUAL HARASSMENT.....	3
PREVENTATIVE MEASURES THAT PTC WILL TAKE.....	3
WORKING ENVIRONMENT	3
Power Imbalances	3
Lone Working	4
Workplace Culture.....	4
Third Parties	4
Speaking Up, Employee Obligation & Mitigating Risk	4
TRAINING COMMITMENT.....	5
Amendments to Other PTC Policies	5
RISK ASSESSMENT	5
REPORTING PROCEDURE	5
HANDLING COMPLAINTS.....	6
Procedure.....	6
Informal Action	6
Formal Action	6
DISCLOSURE OF SENSITIVE COMMUNICATIONS	6
SUPPORTING PEOPLE TO SPEAK UP	6
MANAGER'S CHECKLIST.....	7
APPENDIX 1:.....	8
MEMBER & OFFICER TRAINING RECOMMENDATIONS	8

INTRODUCTION

The Employment Rights Act 2025 and the Worker Protection (Amendment of Equality Act 2010) Act 2023 place a proactive duty upon employers to prevent sexual harassment by taking **all reasonable steps** to prevent employees from being sexually harassed. This policy aims to address and put in place preventative measures to ensure that all are aware of Prestatyn & Meliden Town Council's (PTC) zero tolerance of any and all harassment.

APPLICABILITY

This policy applies to all councillors, volunteers, employees, contractors, and third-party representatives of the council. The requirements of this policy should be reflected in other policies and procedures, agreements and contracts, as necessary. PTC is committed to preventing and addressing sexual harassment and ensuring a safe and respectful environment for everyone.

DEFINITION OF SEXUAL HARASSMENT

Sexual harassment is defined as any unwanted behaviour of a sexual nature that causes a person to feel offended, humiliated, or intimidated. This includes, but is not limited to:

- Unwelcome sexual advances
- Inappropriate physical contact
- Sexual comments or jokes
- Displaying sexually explicit materials
- Sharing inappropriate photographs
- Sending sexually explicit emails or messages

PREVENTATIVE MEASURES THAT PTC WILL TAKE

1. Creating a culture of respect and inclusion
2. Regular training and clear communication of this policy
3. Performing risk assessments to identify and mitigate risks of sexual harassment
4. Clear reporting channels that employees feel safe with using

WORKING ENVIRONMENT

Power Imbalances

People in positions of authority can commit abuses of power and their victims may be less likely to report harassment. Groups such as women, young people, minorities and beneficiaries may be more likely to be targeted because of a perceived lack of power, and these groups may also be more likely to stay silent. Regular supervisions and bi-annual check-ins with staff in a supportive and welcoming environment will ensure that individuals have an environment in which they can speak up or express any concerns. The Staffing Sub-Committee also provides access to designated councillors that staff can speak to if they feel the need to express concerns to someone other than their line manager.

Lone Working

Individuals who engage in lone working are more likely to be vulnerable. PTC's **Lone Working Policy** covers such scenarios, but extra care will be taken to ensure that these individuals are never placed in danger of harassment due to their working environment. There is an obligation placed on both management and employees to prevent placing themselves, where reasonable and possible, in a position where they may be at risk of harassment of any kind. Employees should not engage in lone working - or lone contact with third parties - if they feel they may be placing themselves at risk by doing so. Managers should not oblige employees to do this under any circumstances either.

Workplace Culture

If individuals feel they will not be challenged for their behaviour, such as within workplace cultures where inappropriate 'jokes' or 'banter' are allowed, abuse is more likely. PTC will maintain a zero tolerance working environment in regards to all harassment, and will ensure that all employees, councillors, contractors, members of the public and third-party organisations are aware of this.

Sexual harassment is gender neutral, but statistically, the abuser is a man in a position of authority. PTC will ensure expectations regarding respecting women are clear and that these are maintained at all times. The importance of a harassment-free workplace and the steps taken to ensure this will be properly communicated, and PTC's zero tolerance of sexual harassment will be properly reflected in other policies, induction and on the job training. It will also be demonstrated through all management actions and behaviour.

Any complaints about sexual harassment will be reported through the appropriate channels and, if appropriate, other reporting action will be taken, such as to the Ombudsman for Wales. Regular reviews of the workplace environment and policies will be undertaken to identify and address any potential issues.

Third Parties

There is particular risk to employees where there is regular contact or exposure to third party individuals and organisations who are unaware of this policy, are less concerned about the potential repercussions, or who work in an organisation that does not have an open supportive culture. PTC will ensure that all organisations with whom it does business, or with whom its employees may have contact, place high importance on integrity and preventing harassment.

Speaking Up, Employee Obligation & Mitigating Risk

Employees are encouraged to report situations where they felt at risk, even if nothing happened, and to maintain behaviour standards introduced by the **Code of Conduct for Officers** at work social events. Further ways for workers to get help quickly will be considered in reviews (particularly in relation to risk situations reported by staff), such as panic buttons and alarms.

TRAINING COMMITMENT

The council has a legal duty to prevent sexual harassment and a separate duty to create a training plan and publicise this.

Council Members, officers and other employees need to maintain up-to-date knowledge of their functions and duties, therefore PTC commits to support necessary agreed training and development and meet course expenses, and any travel and subsistence costs incurred, where agreed.

The Local Government and Elections (Wales) Act 2021 requires that:

1. A community [town] council must make and publish a plan (a “training plan”) setting out its proposals in relation to the provision of training for:
 - a. the councillors of the council
 - b. the council’s staff
2. A community [town] council must review its training plan from time to time
3. If a community council revises or replaces its training plan, it must publish the revised or new plan

PTC has committed in its **Training Policy** to performing a knowledge/skills audit and training needs analysis undertaken (at a minimum) after each ordinary election and reviewed/updated annually, or as needed, by the Town Clerk to inform the annual training plan.

By effect of this policy, all Members and officers will have updated training requirements to ensure that they are fully aware of, and up to date on, what constitutes sexual harassment and what steps should be taken to prevent it.

Amendments to Other PTC Policies

This policy inserts a requirement into PTC’s **Training Policy** for all employees and councillors to engage in training for ‘recognising and preventing sexual harassment’.

RISK ASSESSMENT

Sexual harassment will be considered in all risk assessments undertaken by PTC. In assessing risk, any factors specific to the public sector will be considered, as well as the type of work, ways of working and the different roles existing within the organisation.

REPORTING PROCEDURE

If experiencing or witnessing sexual harassment, this should be reported to:

- The line manager in the first instance
- If unable to report the harassment to the line manager, for any reason, report to the Staffing Sub-Committee
- If neither of the above individuals/bodies are suitable to report to, for any reason, report to the Finance & Management Committee or Chair of the Council (whichever is most appropriate)

Reports can be made in person, by letter or via email.

HANDLING COMPLAINTS

All complaints will be taken seriously and handled promptly and sensitively. If substantiated, prompt and effective action will be taken. Any employee found to have engaged in sexual harassment will face disciplinary action, which may include dismissal. Volunteers and councillors will also be subject to appropriate actions.

Procedure

- Acknowledging receipt of the complaint
- Conducting a thorough and impartial investigation
- Keeping all parties informed of the progress
- Ensuring confidentiality as much as possible

Subject to the outcome of an investigation, a range of formal and, potentially, informal options will be considered which both the council and the person making a complaint think appropriate. Applicable PTC policies include: **Grievance Policy, Disciplinary & Capability Policy and Procedures.**

Informal Action

These may include:

- Explaining to the person who is the subject of the complaint why their behaviour was not acceptable and that it needs to change.
- Arranging mediation between the people involved.

Formal Action

A formal procedure will be followed when informal options have not, or would not, work or be appropriate, or a formal complaint was made at the outset.

DISCLOSURE OF SENSITIVE COMMUNICATIONS

Sensitive communications will be handled with the utmost care, which includes:

- Maintaining confidentiality for all parties involved.
- Ensuring that any sensitive information disclosed during the investigation is protected.
- Following legal guidelines on privilege and disclosure to ensure that sensitive communications are only shared with those who need to know.

SUPPORTING PEOPLE TO SPEAK UP

PTC recognises the importance of supporting individuals in speaking up. Sexual harassment is recognised as a Protected Disclosure (Whistleblowing) under the Employment Rights Act 2025 and PTC will not use non-disclosure agreements (NDAs) or 'confidentiality clauses' to stop people reporting sexual harassment.

Creating and maintaining an open, respectful culture is key to supporting individuals and to fostering a safe environment for reporting.

PTC will:

- **Reduce Psychological Barriers:** by acknowledging the difficulty of speaking up and providing reassurance that reports will be taken seriously and handled with sensitivity.
- **Lessen Social Threats:** by making it clear that the intention of reporting is to improve the workplace environment, not to target individuals.
- **Provide Clear Reporting Channels:** by ensuring that people know how and where to report incidents, and that they can do so without fear of retaliation.
- **Offer Support and Resources:** by providing access to counselling and support services for those who report harassment.
- **Encourage a Speak-Up Culture:** by regularly communicating the importance of speaking up and, if reasonably possible, provide training on how to do so effectively.

MANAGER'S CHECKLIST

- Ensure everyone is aware of this policy and understands that sexual harassment is always unacceptable.
- Ensure appropriate training is provided for all those affected by this policy.
- Ensure all staff are made aware of the whistleblowing policy and whom the point of contact is for raising concerns.
- Carry out a sexual harassment risk assessment to identify risk areas and take appropriate action to reduce this risk. For example, factors might include:
 - Lone working
 - The presence of alcohol
 - High degree third-party interaction
 - Power imbalances between staff and/or others
- Be approachable and listen, so that people feel confident enough to speak up, if they feel they need to.
- Take any complaints seriously, respond sensitively and quickly and, if proven, ensure that the action taken is prompt and effective.
- When talking to someone about a sexual harassment complaint, some things will be automatically inappropriate or unacceptable, such as:
 - Stating that the process could be a long and difficult one and asking if the individual is sure that they want to go ahead – this could imply you think they should not.
 - Stating the complaint does not seem that serious – all complaints must be treated seriously.
- Always keep an open mind and do not let your own views influence a situation or lead you to dismiss a concern.
- Do not doubt a sexual harassment complaint because it happened away from other people or there are no other witnesses.
- Most importantly, work to create a culture of openness and respect in which anyone feels able to speak up and sexual harassment is unacceptable to everyone.

APPENDIX 1:

MEMBER & OFFICER TRAINING RECOMMENDATIONS

Acas provide the below self-paced free online courses for employers and employees, which might be helpful in relation to sexual harassment:

- Bullying and harassment
- Managing conflict
- Equality, diversity and inclusion
- Managing people

Relevant courses are also provided free on [Alison.com](https://www.alison.com) and the below courses are suitable for councillors and staff to familiarise themselves with their duties and obligations in regards to sexual harassment:

- Sexual Harassment Training (UK): Equality Act 2010
- Understanding and Preventing Sexual Harassment
- Sexual Harassment in the Workplace

Once outside training has been completed by staff, management should hold a group training session to review how well the training has been absorbed by officers and thus how well it will be applied.