ANDOVER TOWN COUNCIL

Sexual Harassment Prevention Policy 2026

1. Purpose

Andover Town Council is committed to providing a working environment in which everyone is treated with dignity and respect.

The Council operates a zero-tolerance approach to sexual harassment and will take all reasonable steps to prevent sexual harassment occurring in the workplace, during Council business and at work-related events.

This policy reflects the Council's obligations under the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the ACAS guidance and Code of Practice relating to dignity at work and sexual harassment prevention. Employers have a positive legal duty to take reasonable steps to prevent sexual harassment before it occurs.

2. Scope

This policy applies to:

- Employees of Andover Town Council.
- Councillors when acting in an official Council capacity.
- Volunteers.
- Contractors and agency workers.
- Members of the public, suppliers, tenants, consultants and other third parties who interact with the Council.

The policy applies to:

- The workplace.
- Home and hybrid working arrangements.
- Meetings and site visits.
- Council events and civic functions.
- Conferences, training and networking events.
- Work-related travel.
- Electronic communications, including email, telephone, social media and messaging platforms.

Version	Date	Minute Number	Approved by	Review Date
DRAFT 0.1	7 October 2026	PR 038/10/26	Policy and Resources	every three years, or sooner if legislation, national guidance or Council requirements change.
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3. Statement of Commitment

The Council believes that everyone has the right to work in an environment free from sexual harassment, victimisation, intimidation and inappropriate behaviour.

The Council will:

- Take proactive steps to prevent sexual harassment.
- Promote a culture of professionalism, respect and inclusion.
- Take all complaints seriously.
- Investigate complaints promptly and fairly.
- Take appropriate action where misconduct is identified.
- Support individuals affected by sexual harassment.
- Protect individuals from victimisation for reporting concerns or participating in investigations.

4. Definition of Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of:

- Violating a person's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment can occur regardless of:

- Age.
- Sex.
- Sexual orientation.
- Gender reassignment.
- Marital status.
- Seniority or position.

A single incident can constitute sexual harassment.

Examples may include:

- Unwanted sexual comments, jokes or remarks.
- Sexualised banter.

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- Inappropriate messages, emails or images.
- Intrusive questions about a person's private life.
- Unwanted physical contact.
- Staring, leering or suggestive gestures.
- Requests for sexual favours.
- Displaying sexually explicit material.
- Conduct occurring through social media or online platforms.
- Conduct occurring at work-related social events.

These examples are illustrative and not exhaustive.

5. Third-Party Harassment

The Council recognises its duty to take reasonable steps to protect workers from sexual harassment by third parties, including:

- Members of the public.
- Allotment tenants.
- Contractors.
- Suppliers.
- Consultants.
- Event attendees.
- Service users.

The Council will not tolerate sexual harassment from any individual interacting with the Council and may take appropriate action including:

- Ending meetings.
- Excluding individuals from Council premises or events.
- Reporting incidents to the Police where appropriate.
- Reviewing contractual or service arrangements. [acas.org.uk], [gov.uk]

6. Prevention Measures

The Council will take reasonable steps to prevent sexual harassment by:

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- Maintaining and regularly reviewing this policy.
- Providing induction and refresher training.
- Promoting appropriate workplace behaviour.
- Risk assessing activities where harassment risks may arise.
- Providing confidential reporting mechanisms.
- Investigating complaints promptly.
- Monitoring trends and incidents.
- Taking disciplinary action where necessary.

Particular consideration will be given to situations identified by ACAS as carrying heightened risk, including:

- Lone working.
- Working with members of the public.
- Evening events.
- Work-related travel.
- Social functions involving alcohol.
- Situations involving power imbalances. [acas.org.uk]

7. Reporting Concerns

Anyone who experiences or witnesses sexual harassment is encouraged to report it as soon as possible.

Reports may be made to one of the following:

- The Town Clerk.
- A Line Manager.
- The Chair of the HR Sub-Committee.
- The Mayor, where appropriate.
- Another appropriate senior representative where the complaint involves the Town Clerk.

Reports may be made verbally or in writing.

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No individual will suffer detriment for making a genuine complaint or raising a concern in good faith.

8. Investigation

The Council will arrange an independent investigation of the complaint promptly, sensitively and impartially.

Investigations may include:

- Interviews with relevant individuals.
- Review of correspondence or records.
- Collection of witness statements.
- Consideration of relevant evidence.

Confidentiality will be maintained as far as reasonably practicable.

Where appropriate, the Council may implement temporary measures to protect those involved during an investigation.

9. Outcomes

Where an allegation is upheld, action may include:

- Informal resolution.
- Additional training.
- Mediation where appropriate.
- Formal disciplinary action.
- Removal from Council events or premises.
- Termination of contracts or arrangements.
- Referral to the Police.

The action taken will depend on the seriousness of the conduct.

10. Malicious Complaints

The Council recognises that complaints made in good faith may not always be upheld.

However, complaints found to have been deliberately false or malicious may be treated as a disciplinary matter.

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11. Responsibilities

Full Council

- Approves and reviews this policy.
- Promotes a culture of dignity and respect.
- Provides appropriate resources for implementation.

HR Sub-Committee

- Oversees the operation of the policy.
- Reviews any significant incidents or trends.
- Monitors compliance and training requirements.

Town Clerk

- Ensures implementation of the policy.
- Arranges training and awareness activities.
- Manages complaints and investigations appropriately.
- Maintains confidential records.

Employees, Councillors and Volunteers

- Treat others with dignity and respect.
- Comply with this policy.
- Report incidents or concerns.
- Participate in investigations when required.

12. Support

Individuals affected by sexual harassment will be offered appropriate support, which may include:

- Welfare meetings.
- Adjustments to working arrangements.
- Signposting to counselling or employee support services.

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- Access to the Council's grievance procedures where applicable.

13. Data Protection

Information relating to complaints, investigations and outcomes will be processed in accordance with:

- UK GDPR.
- Data Protection Act 2018.
- The Council's Data Protection Policy and Procedure.

Only those with a legitimate need to know will have access to such information.

Related Policies

- Dignity at Work Policy
- Grievance Policy
- Disciplinary Policy
- Equality and Diversity Policy
- Lone Working Policy
- Health and Safety Policy
- Code of Conduct for Employees
- Councillor Code of Conduct
- Data Protection Policy and Procedure

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