

# 2025

## Sexual Harassment POLICY



**MARLOW**  
TOWN COUNCIL



# Sexual Harassment Policy

Adopted: 210.06.2025 Minute M.20.25

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## Included in the policy:

1. An explanation of what sexual harassment is
2. A statement that says Marlow Town Council will not tolerate sexual harassment
3. What someone should do if they experience or witness sexual harassment
4. How managers should deal with sexual harassment complaints
5. How Marlow Town Council will deal with sexual harassment from third parties, for example public or suppliers
6. Support that's available for anyone affected by sexual harassment
7. How Marlow Town Council will handle time off because of sexual harassment
8. Marlow Town Council's approach to assessing and managing risks of sexual harassment
9. The Law on sexual harassment

## 1. An Explanation of sexual harassment

Sexual harassment is unwanted behaviour of a sexual nature. The law (Equality Act 2010) protects the following people against sexual harassment at work:

- employees and workers
- contractors and self-employed people hired to personally do the work
- job applicants

To be sexual harassment, the unwanted behaviour must have either:

- violated someone's dignity
- created an intimidating, hostile, degrading, humiliating or offensive environment for someone

It can be sexual harassment if the behaviour:

- has one of these effects even if it was not intended

- intended to have one of these effects even if it did not have that effect

Sexual harassment can happen to men, women and people of any sexual orientation. It can be carried out by anyone of the same sex, another sex or anyone of any sexual orientation.

You could experience sexual harassment from anyone you come into contact with because of your job, including:

- someone you work with
- a manager, supervisor or someone else in a position of authority
- third parties – for example customers, clients and members of the public

## Examples of sexual harassment

Sexual harassment can be a one-off incident or an ongoing pattern of behaviour.

It can happen in person. It can also happen online, for example in meetings, email, social media or messaging tools.

Examples include:

- making sexual remarks about someone's body, clothing or appearance
- asking questions about someone's sex life
- telling sexually offensive jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment
- displaying or sharing pornographic or sexual images, or other sexual content
- touching someone against their will, for example hugging them
- sexual assault or rape

What some people might consider as joking, 'banter' or part of their workplace culture can still be sexual harassment.

Sexual harassment is usually directed at an individual, but it's not always the case. Sometimes there can be a culture of behaviour that's not specifically aimed at one person – such as sharing sexual images. Someone could still make a complaint of sexual harassment in this situation.

## 2. The Statement

- Marlow Town Council will not tolerate sexual harassment
- complaints will be taken seriously and not be ignored
- this applies to everyone in the organisation, regardless of role or status
- victimisation or retaliation against a complainant will not be tolerated

## 3. What someone should do if they experience or witness sexual harassment

Depending on who the person feels most able to talk to, they should report any incidents to:

- a manager or
- a colleague or
- the Chair of the Council or
- staff who are specially trained to deal with sexual harassment complaints or
- their trade union representative, if they're a member

The complaint can be:

- raised informally or
- raised a grievance\* – this is where someone makes a formal complaint

Usually, someone making a complaint can choose if they want it to be dealt with informally or formally.

Some situations might be too serious to deal with informally.

If a formal complaint is raised, this will be dealt with in accordance with the Town Council's grievance policy.

## 4. How managers should deal with sexual harassment complaints

- Managers should refer to the Town Council's grievance policy and deal with the complaint in compliance with the policy. If the harassment occurred within the workplace, follow internal reporting and investigation procedures.
- Grievance policy
- Staff Handbook

## 5. How Marlow Town Council will deal with third party sexual harassment

Employees should report sexual harassment from third parties. For example, customers, clients, service users and members of the public inline with the policy.

Preventing third-party sexual harassment—harassment by clients, customers, suppliers, or other non-employees—is essential for maintaining a safe workplace. Here are key strategies Marlow Town council will implement to address it:

### a. Establish a Clear Policy

- Define third-party sexual harassment explicitly in your sexual harassment policy
- Outline unacceptable behaviours, including verbal, non-verbal, and physical harassment
- third-party harassment will be taken as seriously as employee harassment

### b. Train Employees and Managers

- Conduct regular training on recognizing and responding to third-party harassment
- Teach employees how to set boundaries and report incidents
- Ensure managers know how to support affected employees and handle complaints properly

### c. Provide a Safe Reporting Mechanism

- Offer multiple, confidential reporting channels
- Ensure employees feel comfortable reporting harassment without fear of retaliation
- Allow anonymous reporting if possible

### d. Respond Promptly and Effectively

- Investigate all complaints thoroughly and impartially
- Take immediate corrective action, including warning or banning the harasser
- Support the affected employee with accommodations if needed

### e. Communicate Expectations to Third Parties

- Include anti-harassment clauses in contracts with clients, suppliers, and partners

- Display workplace policies on the website
- Inform third parties that harassment will not be tolerated and can lead to termination of services or contracts

f. Empower Employees to Speak Up

- Encourage employees to assertively reject inappropriate behaviour
- Offer de-escalation training for frontline staff
- Create a culture where employees feel supported in reporting misconduct

## 6. External sources of support and advice

[Sexual harassment and harassment at work: technical guidance](#)

[Rights of Women](#)

[LGBT Foundation](#)

[Rape Crisis England and Wales](#)

[Samaritans](#)

## 7. How Marlow Town Council will handle time off because of sexual harassment

a. Provide Immediate Support

- If an employee requests time off after experiencing harassment, respond promptly and with empathy
- Ensure they feel safe and supported without pressuring them for details they're not comfortable sharing

b. Offer Paid or Unpaid Leave Options

- Check company policies and legal requirements regarding paid leave for harassment-related situations
- If no specific policy exists, Marlow Town Council will consider offering:
  - **Sick leave** (if the employee experiences emotional distress or mental health impacts)
  - **Personal or discretionary leave** (for court proceedings, therapy, or recovery)
  - **Paid administrative leave** (to allow investigation while protecting the employee)

- **Flexible work arrangements** (such as remote work or reduced hours)
- c. Ensure Confidentiality and Protection from Retaliation
  - Keep all discussions about the situation private
  - Make it clear that taking leave due to harassment will not result in any negative consequences
- d. Offer Additional Resources
  - Provide access to Employee Assistance Programs (EAP) or mental health resources
  - Guide employees on legal options, such as protective orders if needed
  - Ensure the employee feels safe upon their return, including possible schedule or work environment adjustments

## 8. Marlow Town Council's approach to assessing and managing risks of sexual harassment

Marlow Town Council will:

- consider the risks of sexual harassment happening
- consider what measures could be taken to reduce the risks of sexual harassment happening
- consider which measures are reasonable to take
- implement the measures

What is reasonable depends on the situation. There's no set list of steps that all employers must take.

### Considering risks

Sexual harassment can happen in any organisation. Marlow Town Council does not assume that it will not happen.

The Town Clerk will assess any possible risks. The sexual harassment risk assessment will be reviewed and adopted by the Town Council annually.

### Steps to prevent sexual harassment

Marlow Town Council will:

- make it clear to all employees, and service users that it will not tolerate sexual harassment
- encourage staff to report any incidents of sexual harassment
- encourage staff to report situations where they felt at risk, even if nothing happened

- setting standards of behaviour for work social events
- having someone at senior level (Town Clerk) to make sure the organisation is taking steps to prevent sexual harassment
- have a specific policy on sexual harassment
- have a process for reviewing policies and training
- take steps to create the right culture

## 9. The law on harassment

The laws that protect people against sexual harassment are:

- the Equality Act 2010
- the Worker Protection (Amendment of Equality Act 2010) Act 2023 – this law is about preventing sexual harassment

The Equality Act 2010 also covers other types of harassment. This includes:

- harassment related to certain 'protected characteristics' – for example sex, sexual orientation and gender reassignment
- less favourable treatment because of how someone responded to previous sexual harassment

Someone could experience more than one type of harassment at the same time.