



DOVER TOWN COUNCIL

Dignity at Work

Policy & Procedure

2026 Version

Adopted: 20/04/2026 (Min No. 236h)

Issued Date: 20/4/26

Last Revised Date: N/A NEW

DIGNITY AT WORK POLICY

Dover Town Council believes that civility and respect are important in the working environment, and expect all Councillors, officers and the public to be polite and courteous when working for, and with members, officers and contractors of the Council.

Purpose

Dover Town Council is committed to creating a working environment where all council employees, councilors, contractors and others who come into contact with the Council in the course of its work, are treated with dignity, respect and courtesy. The Council aims to create a workplace where there is zero tolerance for harassment and bullying.

In support of this objective, the Council has signed up to the Civility and Respect Pledge, as a commitment to civility and respect in its work, and politeness and courtesy in behaviour, speech, and in the written word. Further information about the Civility and Respect Pledge is available from [NALC](#) & [SLCC](#)

The Council recognises that there is a continuum where unaddressed issues have the potential to escalate and become larger, more complex issues and 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 alongside the Equality and Diversity, Complaints and Grievance Policies:

- explains how we will respond to complaints of bullying or harassment;
- ensures that we respond sensitively and promptly; and,
- supports our employees in ensuring their behaviour does not amount to bullying and/or harassment by giving examples.

Scope

This policy covers bullying and harassment of and by Senior Staff and all employees engaged to work at Dover Town Council. Should contractors have a complaint connected to their engagement with Council Staff this should be raised to their nominated contact, manager, or the Chair of the Council, in the first instance. Should the complaint be about the chair of the council a complaint should be made to the Town Clerk.

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

Complaints about other employment matters will be managed under the council's grievance policy.

It is noted that the management of a situation may differ depending on who the allegations relate to (e.g., employees, contractors, Councillors). However, the council will take appropriate action if any of its employees are bullied or harassed by employees, Councillors, members of the public, suppliers, or contractors.

The position on bullying and harassment

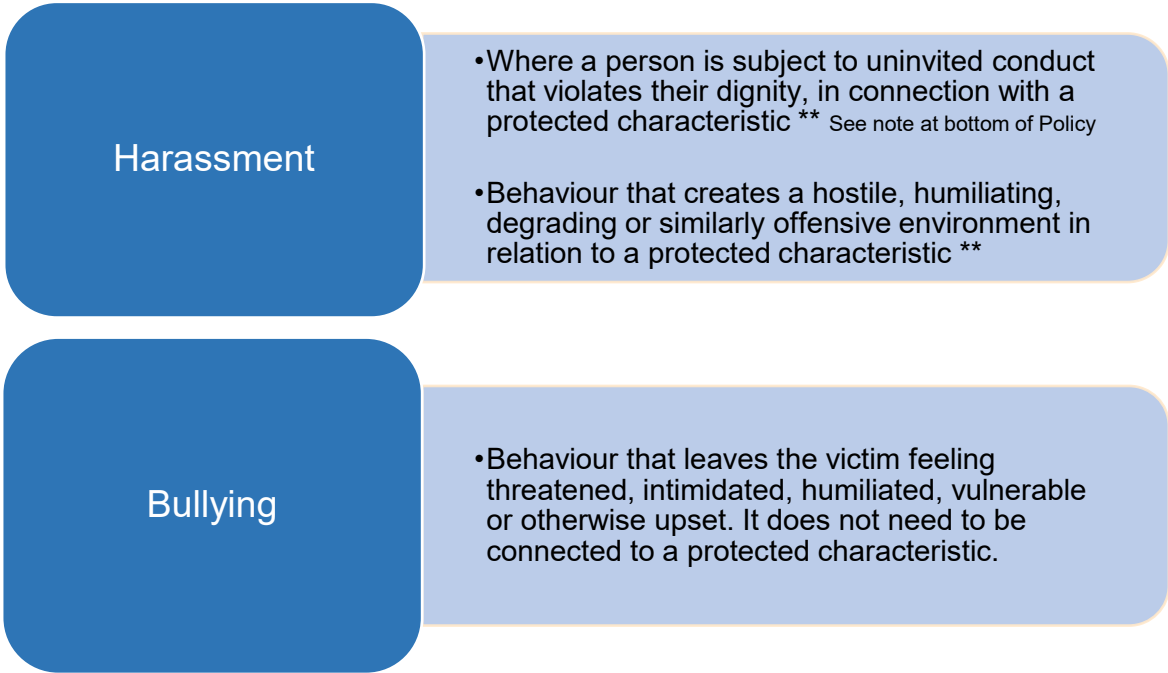
All staff and council representatives are entitled to dignity, respect and courtesy within the workplace and to not experience any form of discrimination. Dover Town Council will not tolerate bullying or harassment in its workplace or at work-related events outside of the workplace, whether the conduct is a one-off act or repeated course of conduct, and whether harm is intended or not. Neither will it tolerate retaliation against, or victimisation of, any person involved in bringing a complaint of harassment or bullying. All staff and council representatives should also be aware that, if they have bullied or harassed someone (e.g. physical violence, harassment), in some circumstances the treatment may amount to a crime punishable by a fine or imprisonment.

Dover Town Council expects all representatives of the council to treat each other with respect and uphold the values of its code of conduct, civility and respect pledge, equality and diversity policy, and all other policies and procedures adopted by the Council.

The Council expects staff and council representatives to demonstrate respect by listening and paying attention to others, having consideration for other people’s feelings, following protocols and rules, showing appreciation and thanks and being kind.

Allegations of bullying and harassment will be treated seriously. Investigations will be carried out promptly, sensitively and, as far as possible, confidentially. Please refer to 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 the Council 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?

'Bullying' or 'harassment' are phrases that apply to treatment from one person (or a group of people) to another that 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.

Examples of bullying and harassment include, but are not limited to:

- 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, abilities or performance at work
- 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 work and contribution, whether directly and / or in front of others or not
- The use of obscene gestures
- Abusing a position of power
- Treating someone in a hostile and/or belittling manner

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. Everyone has the right to determine what offends them. 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, staff and council representatives should be aware that harassment will occur if behaviour continues after the recipient has advised the person/s 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). Please refer to the Council's Equality and Diversity Policy.

All staff and council representatives, therefore, must 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.

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 behaviour or performance from a 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 the person is acting in good faith, i.e. they genuinely believe that what they were saying is true, they have a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment. The Council will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised a colleague.

Making a complaint that the person involved knows to be untrue, or giving evidence that they know to be untrue, may lead to disciplinary action being taken against them.

Reporting Concerns

What staff and council representatives should do if they are being bullied or harassed by a member of the public or supplier (as opposed to a colleague)

If they are being bullied or harassed by someone with whom they have come into contact with at work, they should raise this with their nominated manager in the first instance or, with the Town Clerk or the Mayor. Any such report will be taken seriously, and Dover Town Council will decide how best to deal with the situation, in consultation with the individual.

What staff and council representatives should do if you feel you are being bullied or harassed by a councillor:

If they are being bullied or harassed by a councillor, they should raise this with the Town Clerk or the chair of the council in the first instance. They will then decide how best to deal with the situation, in consultation with the person involved. There are two possible avenues for them to take, 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 the individual's health and safety. Such measures may include a temporary change in their duties or change of work location, not attending meetings with the person about whom the complaint has been made etc.

What staff and council representatives should do if they witness an incident, they believe to be harassment or bullying:

If they witness such behaviour, if it is safe to do so, they should challenge the behaviour at the time. If not, they should report the incident in confidence to the Town Clerk or the Mayor. Such reports will be taken seriously and will be treated in strict confidence as far as it is possible to do so.

What staff and council representatives should do if you are being bullied or harassed by another member of staff:

If they are being bullied or harassed by a colleague or contractor, there are two possible avenues for them to use, informal or formal. These are described below.

Informal resolution

If anyone is being bullied or harassed, they may be able to resolve the situation themselves by explaining clearly to the perpetrator(s) that their behaviour is unacceptable, and contrary to the council's policy and must stop.

Alternatively, they may wish to ask the Town Clerk, or their nominated manager or another colleague to put this on their behalf or to be with them when confronting the perpetrator(s).

If the above approach does not work or if they do not want to try to resolve the situation in this way, or if they are being bullied by their own nominated manager, they should raise the issue with the Town Clerk or Chair of the council. (*If their concern relates to the chair, they should raise it with the Town Clerk and vice versa*). The chair (*or another appropriate person*) will discuss with them 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 Council 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 the individual's name, if this is what they want. The person dealing with the complaint will also stress that the conversation is confidential.

In certain circumstances they 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 them if it is appropriate.

If their 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) the Council may decide to investigate further and take more formal action notwithstanding that the complainant raised the matter informally. They will consult with the complainant before taking this step.

Raising a formal complaint

If informal resolution is unsuccessful or inappropriate, the individual can make a formal complaint about bullying and harassment through the council's grievance procedure. They should raise their complaint in writing to the Town Clerk or the Mayor. A formal complaint may ultimately lead to disciplinary action against the perpetrator(s) where they are employed.

The Town Clerk or the Mayor will appoint someone to investigate the complaint in line with the grievance policy.

The Complainant 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 and
- Any action taken by them to resolve the matter informally.

The alleged perpetrator(s) would normally need to be told the complainant's name and the details of their grievance in order for the issue to be investigated properly. However, the Council will carry out the investigation as confidentially and sensitively as possible. Where the complainant and the alleged perpetrator(s) work in proximity to each other, the Council will consider whether it is appropriate to make temporary adjustments to working arrangements whilst the matter is being investigated.

Where the 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 the individual in their 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, the Council representative will ensure that individuals' personal data is handled in accordance with the data protection policy.

The council will consider how to protect the individual's health and wellbeing whilst the investigation is taking place and discuss this with them. Depending on the nature of the allegations, the Investigator may want to meet with the complainant to understand better their understanding of the complaint (see the grievance policy for further information, and details of the individual's right to be accompanied).

After the investigation, a panel will meet with them to consider the complaint and the findings of the investigation in accordance with the grievance procedure. At the meeting individuals may be accompanied by a fellow worker or a trade union official.

Following the conclusion of the hearing the panel will write to the complainant to inform them of the decision and to notify them of their right to appeal if they are dissatisfied with the outcome. The individual should put their appeal in writing explaining the reasons why they are dissatisfied with the decision. The appeal will be heard under the appeal process that is described in the grievance policy.

The use of the Disciplinary Procedure

If at any stage from the point at which a complaint is raised, Dover Town Council believe there is a case to answer and a disciplinary offence might have been committed, they will instigate its disciplinary procedure. They will keep all parties informed of the outcome.

Notes:

**** Protected Characteristics**

A 'protected characteristic' is defined in the Equality Act 2010 as age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief, and marriage and civil partnership. It is unlawful to discriminate against an individual because of any of the protected characteristics.

Discrimination includes treating people differently because of a protected characteristic. Employees can complain of harassment even if the behaviour in question is not directed at them. This is because the complainant does not actually need to possess the relevant protected characteristic. An employee can complain of unlawful harassment if they are related someone with a protected characteristic, or because a colleague believes they have a protected characteristic.