

## Anti-Sexual harassment and misconduct policy template

February 2025

### 1. Introduction

This policy outlines [Institution Name]'s commitment to preventing and addressing sexual misconduct and sexual harassment, including staff-to-student and student-to-student instances. It aligns with Condition E6 of the Office for Students (OfS) registration conditions and is informed by guidance from Universities UK.

### 2. Scope

This policy applies to all members of the INTO [centre name] community, including students, staff, and visitors, covering:

- On-campus activities.
- Off-campus university activities.
- Online interactions related to university activities.

### 3. Definitions

**Sexual Misconduct:** includes, but is not limited to, sexual harassment, sexual violence, unwanted sexual advances, and coercion.

**Sexual Harassment:** is any unwanted conduct of a sexual nature that violates dignity or creates an intimidating, hostile, degrading, or offensive environment.

### 4. Principles

1. Zero tolerance: INTO has a zero-tolerance approach to sexual misconduct and harassment.
2. Victim-centred: Support and processes are centralised around the needs of those affected by any alleged acts, and designed to cater to them effectively yet sensitively, and with minimal procedural friction.
3. Fairness: Our approach is designed to ensure due process for all parties involved in any report.
4. Confidentiality: Our approach protects the privacy of individuals to the extent possible (although complete confidentiality cannot always be guaranteed).

## 5. Responsibilities

- **INTO Centre SMT, and ultimately the Centre Director**, is responsible for ensuring the implementation and oversight of this policy and any processes related to it.
- **All INTO community members – including staff, students and visitors** - must comply with the policy and report instances of misconduct in line with the procedures outlined below.
- **Specialised teams, including safeguarding leads and investigators**, are responsible for handling individual reports, investigating them and providing support.

## 6. Reporting and Response Procedures

1. **Making a report:** Students and staff can report incidents through the designated reporting system ([contact information or link]). Anonymous reporting is also available through this service. Alternatively, reports can be made in-person via the [insert team/process]
2. **Initial Response:** Trained staff will assess the report and provide immediate support as appropriate to the complainant. Where a report or complaint is made regarding a third-party, an investigation will be initiated.
3. **Investigation:** A thorough and impartial investigation will follow, adhering to institutional procedures.
4. **Outcomes and Actions:**
  - Depending on the nature of severity of the conduct noted in any report, ultimate sanctions for those found to have perpetrated sexual harassment or misconduct will be a matter for the criminal justice system. INTO will deal with each case proportionately and on its own merits, and may (for example) suspend students or staff whilst an investigation is ongoing. A range of sanctions are possible – again aligned to the circumstances of each individual report – from a mediated settlement between parties, to exclusion from study.
  - Supportive measures for those affected, such as counselling and academic accommodations. Again, these will be dependent on individual circumstances of a case and tailored to the needs of the individual.

## 7. Staff-to-Student Misconduct

1. **Prohibition: Relationships of a sexual or intimate nature between staff and students are prohibited by INTO**, to avoid conflicts of interest and power imbalances, and in line with recommendations from OfS and other regulatory bodies.
2. **Prevention:** INTO provides mandatory training for staff on maintaining professional boundaries and recognising inappropriate conduct, as well as supporting potential victims.
3. **Reporting and Investigation:** Allegations against staff will be handled by a dedicated safeguarding team and, if necessary, referred to external authorities following investigation.

## 8. Student-to-Student Misconduct

1. **Education and Prevention:** INTO will provide regular training and support sessions to students, as well as visible guidance materials in centres, to promote respectful behaviour between students, as well as information on consent and other relationship guidance.

2. **Mediation and Resolution:** Where appropriate, INTO may offer mediation as an outcome of an investigation following a report. More serious cases will result in formal disciplinary action, as outlined above.

Student-to-staff

Person who is both student and staff member

## 9. Support Services

- INTO offers confidential support for affected individuals through [counselling service/contact point].
- There are many other resources and services available; INTO maintains an online resource [XXX] – other useful sources of information can be found as an appendix to this document.

## 10. Monitoring and Review

This policy will be reviewed annually or as required to reflect changes in legislation, guidance, or institutional needs. Each INTO centre has its own 'policy owner', clearly noted within the document. Oversight of the review, implementation and provision of these policies is also maintained by INTO central services.

Procedures