

ANTI-SEXUAL HARASSMENT AND MISCONDUCT POLICY

July 2025

UEA International Study Centre is a joint venture between the University of East Anglia (UEA) and INTO, operating under the umbrella of INTO University Partnerships.

1. Introduction

This policy outlines INTO and UEA International Study Centre's commitment to preventing and addressing sexual misconduct and sexual harassment within the UEA International Study Centre community. This includes instances involving; staff, visitors, contractors, and students enrolled on modules, regardless of the direction of incidents reported. It aligns with Condition E6 of the Office for Students (OfS) registration conditions, is informed by guidance from Universities UK, and aims to create a clear and fair process to prevent, report and address incidents of sexual harassment and misconduct.

2. Scope

This policy applies to all members of the UEA International Study Centre community, including students, staff, contractors and visitors, covering:

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

This policy acts alongside UEA International Study Centre's Safeguarding Policy, including Prevent Duty, to enable our legal safeguarding obligations that apply to under-18s and 'adults at risk' receiving higher education.

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.

Consent: In a sexual context, consent means giving voluntary, informed, and ongoing agreement to participate in sexual activity. It's not simply the absence of a "no," but an active "yes" from all individuals involved, and it can be withdrawn at any time. Consent must be given freely, without coercion, force, or manipulation, and it requires the capacity to understand and make that choice.

Reporting Party: The individual who reports an incident of sexual misconduct, whether or not they are the person directly affected.

Reported Party: The individual who is alleged to have engaged in sexual misconduct.

4. Principles

1. **Zero tolerance:** UEA International Study Centre has a zero-tolerance approach to sexual misconduct and harassment.
2. **Victim-centred:** Reporting methods, 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. **Free speech:** Our approach complies with the requirements of this condition in a manner which is consistent with freedom of speech principles.
6. **Transparency and clarity:** a single comprehensive source of information, setting out policies and procedures, is available online. A clear and easy to understand statement about the existence of the single comprehensive source of information, the nature of its content, and how to access it will be communicated directly to all students and staff in writing at least once each calendar year.

5. Responsibilities

- **UEA International Study 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 UEA International Study Centre community members – including staff, students, contractors 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** – whether in the Human Resources (People) team or the Student Support team - are responsible for handling individual reports, investigating them and providing support.
- **Central INTO staff** are responsible for oversight and coordination of implementation across all Centres, and relevant training provided for staff and students.

6. Reporting and Response Procedures

1. **Making a report:** Students can report incidents through the [designated reporting system](#). Anonymous reporting is also available through [this service](#). Alternatively, reports can be made in-person via the Support Hub on the ground floor.
2. **Initial Response:** Any report will be assessed, and UEA International Study Centre staff will provide immediate support as appropriate to the reporting party.
3. **Triage:** The report will be triaged by the Designated Safeguarding Lead (DSL), Director of Support Services and/or any Deputy Designated Safeguarding Lead (DDSL) staff. If the report alleges a member of staff has engaged in sexual misconduct, the Centre Director and Central INTO People team will assume responsibility of the triage. A decision on investigation and/or external agency involvement will be made at this stage.

3. **Investigation:** A thorough and impartial investigation will follow, led by the Designated Safeguarding Lead or appropriate nominee within the Support Services team. This will be done as soon as possible and normally within five working days. This should include seeking the representations of the reporting party who raised the initial report (where appropriate) and of any other person who was a witness to, or has information relating to, the allegation. This includes seeking representations from the reported party.

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. UEA International Study Centre 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, or termination of employment in the case of staff.

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.

Persons directly affected by any decisions made in respect of incidents of harassment and/or sexual misconduct will be informed that the incident is being investigated and when the matter is resolved.

7. Staff-to-Student Misconduct

1. **Prohibition:** Relationships of a sexual or intimate nature between staff and students are prohibited by UEA International Study Centre, to avoid conflicts of interest and power imbalances, and in line with recommendations from OfS and other regulatory bodies. Any pre-existing relationships need to be declared in advance of either party joining UEA international Study Centre.

2. **Prevention:** INTO and UEA International Study Centre 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 as part of a collaborative process between the Centre and the Central INTO People team and, if necessary, referred to external authorities following investigation.

4. **Retaliation:** Students will be protected from retaliation by the staff member if they report harassment or sexual misconduct.

8. Student-to-Student Misconduct

1. **Education and Prevention:** UEA International Study Centre 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.

9. Student-to-Staff Misconduct

1. Prohibition: Relationships of a sexual or intimate nature between staff and students are prohibited by UEA International Study Centre, to avoid conflicts of interest and power imbalances, and in line with recommendations from OfS and other regulatory bodies. Any pre-existing relationships need to be declared in advance of either party joining UEA international Study Centre.

2. Reporting and Investigation: Allegations against a student by a member of staff will be dealt with jointly by the Central INTO People team and UEA International Study Centre Support team at the centre. Reports of student-to-staff misconduct should be made to the Central INTO People team, or via the [online reporting form](#).

10. Support Services

UEA International Study Centre offers confidential support for affected individuals through UEA talking therapies and Health Assured via the Wisdom app.

There are many other resources and services available; UEA International Study Centre maintains an online resource – 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. Oversight of the review, implementation and provision of these policies is also maintained by INTO central services.

In addition to policy review, UEA International Study Centre and INTO will review the available data on prevalence, and reporting, and undertake credible and evidence-based evaluation of the effectiveness of the steps it is taking to make a significant and credible difference in protecting students from behaviour that may amount to harassment and/or sexual misconduct, and reviewing and adjusting its approach as appropriate.

Reviewed by: Will Gray – Director of Support Services

Date Reviewed: 28 July 2025

Next Review: July 2026

Appendix: External Resources – Greater Norwich Area

Police (emergency)	999	www.norfolk.police.uk
Police (non-emergency)	101	
National Helpline 24hrs	0808 2000247	
Rape Crisis	0808 8029999	
NSPCC	0808 8005000	

Sexual Assault Referral Centre (SARC)

The Harbour Centre 24hrs	01603 276381	www.theharbourcentre.co.uk
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Victim Support

Sue Lambert Trust	01603 622406	www.suelamberttrust.org
Victim Support	0808 1689111	www.victimsupport.org.uk
Leeway	0300 5610077	www.leewaysupport.org
Men's Advice Line	0808 8010327	www.mensadvice.org.uk
Fresh Start New Beginnings	01603 558205	www.fsnb.org.uk
Norfolk County Council	01603 573570	www.norfolk.gov.uk
Daisy Programme – Rowan Project	01953 878488	www.daisyprogramme.org.uk
Norwich & Central Mind	0300 3305488	www.mind.org.uk