

Anti-Sexual harassment and misconduct policy template

July 2025

1. Introduction

This policy outlines INTO Manchester'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, 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 INTO Manchester community, including students, staff, and visitors, covering:

- In-centre activities.
- Off site Centre activities.
- Online interactions related to Centre activities.

This policy acts alongside INTO's Safeguarding and Prevent Policy, 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 It's not simply the absence of a "no," but an active "yes" from all individuals involved, and it can be withdrawn at any time.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.

4. Principles

1. **Zero tolerance:** INTO 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

- **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** – 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 (<https://intostudy-preview.intoglobal.dev/en/company-policy-harassment-report-at-your-centre-man>). Anonymous reporting is also available through this service. Alternatively, reports can be made in-person via the Support Services Team.
2. **Initial Response:** Any report will be assessed, and INTO staff will provide immediate support as appropriate to the complainant.

3. Investigation: A thorough and impartial investigation will follow. The Investigating Officer will undertake a preliminary investigation to determine whether there is a case to answer and will complete an Investigation Report. This will be done as soon as possible and normally within five working days. This should include seeking the representations of the student or staff member who raised the initial report (where appropriate) and of any other person who was a witness to, or has information relating to, the offence.

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, 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 INTO, to avoid conflicts of interest and power imbalances, and in line with recommendations from OfS and other regulatory bodies. Please refer to the Staff-student intimate relationship policy for further information. Note that, regardless of whether a relationship is 'permitted' as per this policy, students can still report and seek support for incidents of harassment or sexual misconduct that may occur within a relationship with an INTO staff member and the student will not be penalised for participating in the relationship.

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 as part of a collaborative process between the Centre and the 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: 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.

9. Student-to-Staff 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. Please refer to the Staff-student intimate relationship policy for further information.

2. Reporting and Investigation: Allegations against a student by a member of staff will be dealt with jointly by HR and Support teams at the INTO centre. Reports of student-to-staff misconduct should be made to the People team, or via the online reporting form. More details can be found in the Employee Anti-Sexual Harassment Policy, which can be found at XXX

10. Support Services

- INTO offers confidential support for affected individuals through the Welfare Team. They can be contacted by email at Manchester.cfc@intoglobal.com. Further information on the types of support available, can be found here: <https://intostudy-preview.intoglobal.dev/en/company-policy-harassment-support-available-at-your-centre>.

- There are many other resources and services available; INTO maintains an online resource at [Company policy / harassment / Landing page | INTO Study](#) – 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.

In addition to policy review, 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.