



## **SEXUAL HARRASSMENT & MISCONDUCT POLICY**

### **1.0 Introduction**

Christ the Redeemer College (CRC) is committed to creating a safe, respectful, and inclusive environment for all students, staff, and members of its community. In accordance with the Office for Students (OfS) Condition of Registration E6, this policy outlines the College's approach to preventing and responding to incidents of sexual harassment and sexual misconduct. The College adopts a zero-tolerance stance on all forms of harassment and sexual misconduct.

### **2.0 Purpose**

2.1 The purpose of this policy is to:

- Ensure a safe, welcoming and inclusive working and learning environments for all members of the CRC community
- Prevent sexual harassment and sexual misconduct across the College community.
- Provide a clear framework for reporting, investigating, and resolving complaints.
- Ensure support is available to those affected by sexual harassment.
- Fulfil the College's obligations under OfS Condition E6 to protect students and uphold their rights.

2.2 The policy should be read in conjunction with the following related policies:

- Code of Conduct
- Bullying and Harassment
- Staff-Student Relationship policy
- Safeguarding
- Code of Discipline
- Staff Handbook
- Code of Discipline and Student Disciplinary Procedures
- Safeguarding policy and procedures.

### **3.0 Scope**

This policy applies to all students, staff, contractors, volunteers, visitors, and any third parties involved in activities connected to CRC, whether on campus, online, or in other College-related contexts.

## **4. Definitions**

4.1 **Sexual Harassment:** Unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

**4.2 Sexual Misconduct:** Any unwanted sexual act or activity, including sexual assault, rape, stalking, grooming, indecent exposure, and sharing of private sexual materials without consent.

## **5. Policy Statement**

Christ the Redeemer College is dedicated to ensuring that all individuals are treated with dignity and respect. The College does not tolerate any form of sexual harassment or sexual misconduct. Allegations will be taken seriously, investigated promptly, and handled with fairness and sensitivity.

All members of the College community are expected to uphold the highest standards of conduct. Training and awareness initiatives will be provided regularly to promote understanding and prevent inappropriate behaviour.

## **6. Principles**

6.1 The core principles of this policy and procedure are that the process is accessible, clear, proportional, timely, fair, and of benefit to the wider student experience.

6.2 Christ the Redeemer College's Sexual Violence and Misconduct disciplinary process will operate in a fair and transparent manner in accordance with the principles of natural justice. It does not seek to reproduce elements of the criminal law and is not a formal legal process.

6.3 The college reserves the right to carry out any of its internal disciplinary processes. This includes but is not limited to circumstances where reported behaviour does not constitute a criminal matter or if following criminal proceedings, the defendant was acquitted.

6.4 Christ the Redeemer College's approaches the storing and sharing of any Party's data with utmost care, consideration and proportionality to ensure fair processing for all Parties under the college's disciplinary procedures.

6.5 In determining an outcome to the disciplinary process at the Panel Hearing the panel members will be assessing whether the incident(s), on the balance of probabilities, contravened Christ the Redeemer College's Code of Conduct.

6.6 In circumstances where the balance of probabilities is not satisfied or insufficient evidence has been provided, CRC or the Disciplinary Panel may decide to take no further action in relation to the allegations.

6.7 The student who has made a report to the college that they have experienced sexual violence, or sexual misconduct will be provided with information about their

options in taking forward their case (unless the Party is external to the college) e.g. progress under this procedure, report to the Police, seek informal resolution. The college will respect the Reporting Party's wishes and support them whether they wish to report to the Police or not.

6.8 A student who is alleged to have perpetrated an act of sexual violence or sexual misconduct (the Responding Student) will be informed of the nature of the allegation and will be given an opportunity to respond to the allegation. They will also be informed of the disciplinary process and made aware of support options available.

6.9 Once the college receives the report it will conduct the Sexual Violence and Misconduct disciplinary process in a timely manner, aiming to complete the process within 90 working days from the start of the investigation. This timescale will depend upon the unique circumstances of each case e.g. the process may be paused if a criminal investigation is ongoing.

6.10 The college will conduct its investigation into alleged misconduct in a fair and impartial way.

6.11 The Reporting and the Responding Student who are being investigated under this policy are entitled to be accompanied at any disciplinary meeting by a friend or a relative. The accompanying person cannot be a professional legal representative who has been employed to act on The Student's behalf, nor can they act in the capacity of a legal advisor, additionally, they are not permitted to speak on behalf of the student, issue statements, propose questions or address the Panel. An accompanying person is present solely for moral support.

6.12 The Reporting and the Responding Student who are being investigated under this policy is entitled to be represented at any disciplinary meeting by a representative who is a support staff member within CRC. A representative is permitted to speak on behalf of the student, issue statements, propose questions and address the Panel. The Reporting Student and the Responding Student are encouraged to seek advice and representation from the student representative council.

6.13 The Responding Student has the right to appeal against any disciplinary finding or sanction. The Reporting Student can appeal against any disciplinary finding or sanction if they've received outcome documentation of a hearing.

6.14 All Student Conduct and Panel staff involved in the process will act with impartiality and with discretion.

6.15 Confidentiality will be maintained, where possible, throughout the process in recognition of the sensitive nature of Sexual Violence and Misconduct matters. As such, information about alleged offences will usually only be shared with relevant individuals/entities (who may be internal or external to the University, e.g. internal counsellors, witnesses, external experts from specialist agencies like Rape Crisis, Sexual Assault Referral Centres or the Police) with the agreement of the Reporting Party.

6.16 All individuals involved in any process under this Policy must keep information that is disclosed to them as part of the process confidential, unless otherwise discussed or communicated with/by the college. Any unauthorised disclosure of confidential information will be considered a Policy violation and will be addressed accordingly.

6.17 The college reserves the right, and may be under an obligation, to share information in exceptional circumstances where such disclosure is necessary to protect any individual or the wider University community from harm or to prevent a crime from taking place.

6.18 The Supported Parties will be offered support throughout the process and kept informed of the progress of the investigation where applicable.

6.19 The college believes that the purpose of a disciplinary process is to help raise the standard of behaviour in its community which is for the benefit of the wider student experience

## **6. Responsibilities**

This policy applies to all members of the CRC Community regardless of their roles and responsibilities

- Staff must model appropriate conduct, report incidents, support affected individuals and maintain professional boundaries in accordance with both the Sexual Harassment & Misconduct Policy and the Staff–Student Relationship Policy.
- Students are expected to engage respectfully with peers and staff, and report concerns about harassment, misconduct, or inappropriate relationships.
- The Senior Leadership Team is responsible for ensuring compliance with this policy and the Staff–Student Relationship Policy, overseeing institutional response mechanisms, and allocating adequate resources.
- Human Resources and Safeguarding Leads are responsible for implementing these and related policies, providing training, maintaining records of disclosures, and managing investigations fairly and confidentially.

- The Compliance Team is responsible for ensuring strict compliance to the college's policies and procedures in line with regulatory requirements and OfS regulations and managing OfS reporting.

## **7. Reporting Procedures**

The College encourages all individuals who have experienced or witnessed sexual harassment or sexual misconduct to report concerns as early as possible. This includes students, staff, and visitors.

### **7.1 Ways to Report**

Reports can be submitted through multiple channels. A custom-built Report and Support platform is currently under development and will be available for both students and staff. Through this platform, individuals will be able to submit reports either with their name attached or anonymously. Named reports allow the College to follow up directly and provide support, while anonymous reports help the College to monitor trends and address systemic risks.

Reports can also be made in person or via email to the Compliance Team, who are designated to triage all reports in this area. Students may also report to a Student Support Advisor, while staff can speak to their line manager or a representative from the Human Resources team. In addition, the College Chaplain is available to all members of the community and can offer confidential pastoral and emotional support.

Formal complaints can also be submitted using the College's Complaints Procedure. Details of this procedure are available on the College website and through the Quality Office.

### **7.2 What Happens After a Report is Made**

Reports are reviewed by the Compliance Team, with appropriate oversight from the Senior Management Team. An initial risk assessment (template in appendix) will be carried out to ensure that the immediate safety and wellbeing of all parties is protected. Those making a report will be provided with support options and guidance on the next steps.

Depending on the nature of the concern, the College may offer an informal resolution process or may initiate a formal investigation. In all cases, the individual making the report will be informed of their rights and choices before any action is taken. Exceptions to this approach may apply if a safeguarding concern arises that requires immediate escalation.

### **7.3 Support and Aftercare**

The College is committed to supporting those affected by sexual harassment or misconduct. Individuals who make a report will be signposted to available support services, including pastoral and emotional care from the College Chaplain. Students may also receive academic adjustments or support with housing if appropriate. Where further guidance is needed, referrals to external agencies such as the police, NHS, or specialist organisations will be facilitated.

If a formal investigation proceeds, student cases will be managed under the College's Student Disciplinary Procedure. Staff cases will be managed under the Staff Disciplinary Procedure in line with employment policy.

### **7.4 Confidentiality and Record-Keeping**

Reports will be handled with sensitivity and care. The College will keep all information confidential, sharing it only on a strict need-to-know basis and in accordance with its safeguarding, legal, and investigatory responsibilities. While anonymous reports may limit the College's ability to investigate individual incidents, they remain an important source of information for improving the overall safety and wellbeing of the College community.

### **7.5 Monitoring and Improvement**

The College regularly reviews the nature and volume of reports received to identify patterns, assess risks, and develop effective responses. This includes an annual review of data and outcomes, which is presented to the Senior Management Team and the Governing Body. Identifying details are removed from all reports used for this purpose to preserve anonymity and privacy.

## **8. Protection from Retaliation**

CRC prohibits retaliation against anyone who reports or participates in an investigation of sexual harassment or misconduct. Retaliatory behaviour will result in strict disciplinary actions in line with the college's policy.

## **9. Support Services**

National Support Available and Reporting

- [The Havens](#)
- [Victim Support](#)
- [The Survivors Trust](#)
- [Survivors UK](#) (for male victim survivors of sexual assault)
- [Galop](#) (LGBT+ anti-violence charity)
- [Respect](#)

- [Women and Girls' Network](#)
- [Women Against Rape](#)
- [One in Four](#)
- [Revenge Porn Helpline](#)
- [Respond](#)
- [Woman's Trust](#)
- [National Stalking Helpline](#)

#### Helplines

- The 24-hour freephone National Domestic Abuse Helpline, run by Refuge, on 0808 2000 247
- The Rape Crisis national freephone helpline on 0808 802 9999 (12 - 2.30pm and 7 - 9.30pm every day of the year).
- Are you in immediate danger? If you are in immediate danger or seriously injured, you can call 999 or 101 to connect directly with the police.

#### **10. Policy Review**

This policy will be reviewed annually or following any significant changes in legislation or guidance from the OfS.

## **Appendix 1**

### **Examples of Harassment**

#### **(non-exhaustive)**

- I. Controlling and coercive behaviours (e.g. behaviours that cause someone serious alarm, distress and/or pressure, which then has a substantial adverse effect on their usual day-to-day activities; 'emotionally blackmailing' an individual to stay in an intimate/friendship relationship; controlling clothing, food, friendship or other personal choices of another individual);
- II. Coercive demands for favours (including sexual favours), including offers or suggestions of sexual or non-sexual favours to further a career or to progress in study, including the suggestion that a refusal may hinder a career/study progression;
- III. Treating someone less favourably because they have submitted or refused to submit to any behaviour in the past, or
- IV. Gaslighting (i.e. manipulating someone by psychological means, or seeking to sow seeds of doubt in a targeted individual or in members of a targeted group, making them question their own memory, perception, and/or sanity, using persistent denial, misdirection, contradiction, and lying);
- V. Grooming behaviours (for example, but not limited to: isolating someone so they are dependent academically and emotionally; buying someone presents or repeatedly insisting on paying for them to create a power imbalance; exploitation of a position of authority or of a power imbalance by an individual for their own advantage by coercing, manipulating or deceiving another person);
- VI. Either directly or indirectly targeting an individual or a group of people because of their ethnic origin, colour, race, nationality, religion, sex, gender, disability, or other presentation or perceived presentation in a way that is intended or-regardless of intent- likely to intimidate or harm;
- VII. Repeatedly engaging in unwanted interaction, including online/via social media (to note, multiple or repeated incidents may be deemed by Rambert School to be more serious than a single act);



- VIII. Continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- IX. Publishing any statement or other material without consent, whether online or in hard copy:
- Purporting to originate from another person;
  - Relating or purporting to relate to another person;
- X. Stalking another person, for example, following a person, watching or spying on them or forcing contact with the victim through any means, including social media;
- XI. Monitoring another person's use of the internet, email or any other form of electronic communication;
- XII. Interfering with the property of another person, including restricting their access to their own property.

## Appendix 2

### Risk Assessment Template

### Sexual Harassment Reporting and Support System

This template is to be completed by the Compliance Team during the triage and follow-up process for reports submitted via the Report and Support platform.

#### Section 1: Report Overview

Date of Report Submission: \_\_\_\_\_

Report Reference ID: \_\_\_\_\_

Is the report anonymous? Yes / No

Role of Reporter: Student / Staff / Visitor

Date and Location of Incident(s): \_\_\_\_\_

#### Section 2: Initial Risk Indicators

Nature of Concern Reported:

Check all applicable indicators:

- ☐ Ongoing risk to individual or others
- ☐ Safeguarding concern (e.g. under 18, vulnerable adult)

- ☐ Mental health or self-harm risk
- ☐ Risk of retaliation or escalation
- ☐ Multiple individuals implicated
- ☐ Incident linked to protected characteristic (e.g. gender, race, religion)
- ☐ Incident occurred on College premises or at a College event

### Section 3: Initial Actions Taken

Has the individual been contacted? Yes / No / N/A

Support offered (e.g. Chaplain, Student Services, HR):

Was a safeguarding referral made? Yes / No

Recommended Immediate Action:

- ☐ Monitor only
- ☐ Informal resolution or guidance
- ☐ Formal investigation initiated
- ☐ Referral to external services (e.g. police, NHS)
- ☐ Referral to Student or Staff Disciplinary Procedure

### Section 4: Risk Rating

Likelihood of Harm - Low / Medium / High

Potential Impact - Low / Medium / High

Overall Risk Rating - Low / Medium / High

Assessed by (Name and Role) \_\_\_\_\_

Date of Assessment: \_\_\_\_\_

## Section 5: Follow-Up and Review

Follow-up Actions Required:

Scheduled Review Date (if applicable): \_\_\_\_\_

Additional Notes or Observations:

| Control           |                          |
|-------------------|--------------------------|
| Policy Name:      | Sexual Harassment Policy |
| Version:          | 1.0                      |
| Prepared by:      | Abiola Oke               |
| Date Created:     | 07/07/2025               |
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