

Abuse of Power Code of Practice

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1. Statement

William College is committed to cultivating a culture of integrity, fairness, and accountability in all academic and administrative functions. Recognising that abuse of power—whether through misconduct, discrimination, financial impropriety, or misuse of authority—undermines our core values, the College upholds rigorous policies and governance standards to prevent and address such behaviour.

Abuse of power has no place in our institution. Leadership and authority must be exercised with responsibility, transparency, and respect. Every individual—student, staff, faculty, or senior leader—has the right to be treated with fairness and dignity and the responsibility to uphold these principles. Any misuse of authority contradicts our institutional values and public interest governance principles.

To reinforce this commitment, the College has implemented a policy framework that sets clear expectations, ensures rigorous oversight, and provides secure channels for reporting concerns. Senior leadership, including the Board of Governors, Provost, Academic and administrative managers, bears a heightened responsibility to model ethical behaviour, uphold regulatory standards, and foster an environment where concerns can be raised without fear of retaliation. Decisions affecting students, faculty, and staff must be made with fairness, due process, and accountability.

Prevention is as critical as enforcement. William College mitigates power abuse risks through mandatory training, conflict of interest declarations, and structured checks and balances in financial, academic, and governance processes. Our policies prevent unchecked influence over significant decisions, safeguarding against bias, favouritism, or coercion. We encourage an open-door culture that promotes dialogue, transparency, and collective responsibility.

By embedding these principles into our institutional framework, we reaffirm our dedication to a safe, respectful, and inclusive environment where education and professional conduct thrive. Ethical leadership is not just an expectation but a fundamental requirement, and breaches of trust will be met with decisive action. Through integrity, oversight, and accountability, we safeguard the trust and excellence that define William College.

The Code of Practice serves as both a guide and a promise: defining unacceptable behaviours, leadership duties, secure reporting procedures, and commitments to fair investigation and accountability to deter and correct misconduct.

2. Scope

This Code applies to all members of the College community, including senior leadership, academic and professional staff, and individuals in positions of authority. It covers behaviours and actions both on and off-campus whenever they relate to College duties. The aim is to ensure power is exercised ethically and that abuses are prevented or addressed promptly and impartially.

3. Definitions and examples of Abuse of Power

Abuse of power refers to situations where an individual misuses their position of authority or influence to exploit, mistreat, or unfairly disadvantage others, or to benefit themselves inappropriately. It can take many forms in a higher education context. The following are definitions and examples of the types of misconduct considered as abuse of power at William College:

- **Academic Misconduct:** Any action by someone in a teaching or evaluation role that violates academic integrity or fairness. This includes general misconduct (e.g. data falsification or plagiarism) and teaching-related misconduct (e.g. giving undue advantage to certain students). Such behaviours exploit the inherent power imbalance between educators and students, thereby undermining scholarly standards. For example, favouritism in grading, unjustly denying academic opportunities, or manipulating research outcomes to serve personal interests.
- **Bullying and Harassment:** Bullying is offensive, intimidating, malicious, or insulting behaviour — often an abuse or misuse of power — that has the purpose or effect of undermining,

humiliating, or injuring an individual. Harassment is similar, unwanted conduct (which can be repetitive) that violates a person's dignity or creates a hostile or offensive environment. This can include verbal abuse, threats, spreading malicious rumours, or deliberate exclusion of someone. In an academic setting, bullying might involve a lecturer who threatens negative academic consequences, such as poor grades or unfavourable recommendations, if a student does not comply with personal demands or viewpoints. This coercion creates a climate of fear and inhibits academic freedom, making it difficult for students to challenge ideas, express concerns, or seek fair treatment. Such behaviour is unacceptable at William College; even subtle actions that demean or intimidate a person are considered harassment. All members of the College have the right to work and study in an environment free from bullying and harassment.

- **Discrimination:** Discrimination is the unjust or prejudicial treatment of people based on personal characteristics such as race, gender, religion, age, disability, sexual orientation, or other protected characteristics defined by the Equality Act 2010. Abuse of power in this form occurs when a person in authority treats someone less favourably, or creates policies or decisions, because of these characteristics. Examples include a manager who consistently denies opportunities or resources to an individual (or group of individuals) due to bias or prejudice, or any decision-making that is influenced by stereotypes rather than merit. William College is committed to equality, diversity and inclusion, and any form of discriminatory behaviour by those in positions of power will be treated as serious misconduct.
- **Financial Mismanagement:** This involves the misuse or misappropriation of the College's finances or resources by an individual in a position of trust. It includes acts such as embezzlement, fraud, improper use of budgets or grants, or authorising expenditures to benefit oneself, family, or friends (nepotism) without regard for proper procedure. Financial mismanagement is an abuse of authority that violates principles of regularity, propriety, and value for money in the use of institutional funds. Examples include a department head manipulating accounts for personal gain, or a manager showing favouritism in awarding contracts (conflict of interest leading to improper procurement). William College has a zero-tolerance stance toward financial irregularities and expects all managers to handle funds and contracts with transparency and accountability.
- **Abuse of Authority/Position:** Any other misuse of one's seniority or influence that doesn't fall neatly into the above categories. This can include nepotism (favouring relatives or friends in hiring, promotions, or opportunities), favouritism and unfair treatment not based on merit, or coercive behaviours (pressuring someone to do something outside their role, or to ignore this Code, under threat of negative consequences). For instance, if a senior academic forces junior staff to support a personal project unrelated to their duties or threatens negative performance reviews unless personal requests are met, that is an abuse of authority. Similarly, managers ignoring institutional policies to grant undue advantages (or disadvantages) misuse their power. Even if such actions are not outright illegal, they violate William College's ethical standards and this Code.
- **Sexual Favours or Advancement:** Abuse of power in the form of soliciting or coercing sexual favours in exchange for professional, academic, or financial advantages is a severe violation of ethics and misconduct at William College. This includes any attempt by an individual in a position of authority—such as a faculty member, manager, or senior leader—to demand, request, or imply that sexual favours will influence decisions related to grades, promotions, funding, employment, or any other professional or academic benefit.

Examples of Sexual Favour-Related Abuse of Power:

- A lecturer or academic supervisor offering a higher grade, positive reference, or research opportunity to a student in return for a romantic or sexual relationship.
- A manager or senior leader pressuring a subordinate or colleague into an intimate relationship by implying it will benefit their career progression, job security, or salary review.
- A staff member making unwanted sexual advances towards a student or another staff member, coupled with an implicit or explicit threat of academic, professional, or financial consequences for rejecting those advances.

- A person in power conditioning access to funding, scholarships, leadership roles, or professional opportunities on sexual compliance.
 - Retaliation (such as bad performance reviews, negative recommendations, or exclusion from opportunities) against someone who refuses, resists, or reports sexual favour demands.
- **Power Imbalance and Coercion:** In any professional or academic setting, consent cannot be freely given when there is a power imbalance. Even if a relationship appears to be "voluntary," the College recognises that the disparity in authority can lead to coercion or undue influence, where a student or employee feels pressured to comply out of fear of repercussions. Therefore, the College strictly prohibits all romantic or sexual relationships between individuals where one has direct authority over the other, such as:
 - Staff and students they support, supervise, assess, or teach.
 - Managers and their direct reports.
 - Academic or administrative staff and those who depend on them for professional opportunities.

Additionally, the College recognises that even consensual relationships between individuals in positions of authority and subordinates can create a conflict of interest, bias, or perceived favouritism. Staff in such situations must disclose such relationships under Staff-Student Relationship Policy so appropriate steps can be taken to remove any direct decision-making power over the subordinate.

These categories often overlap. For example, discriminatory harassment or a case of academic misconduct could also involve bullying or conflict of interest. Any single incident may be evaluated under multiple definitions of misconduct. The key element is the power imbalance – the accused has some form of authority or influence over the victim or situation, which they have misused. All members of William College, especially those in leadership or supervisory roles, are expected to conduct themselves in a way that avoids even the perception of abusing power.

William College has a zero-tolerance approach to sexual exploitation, coercion, and favour-based advancement. Any individual found to have engaged in such misconduct will face severe disciplinary actions, up to and including dismissal or expulsion, and may also be subject to legal consequences under UK harassment and sexual misconduct laws. Individuals who witness or experience this form of power abuse are strongly encouraged to report concerns through the College's confidential reporting channels. The College also prohibits retaliation against individuals who reject unwanted advances or report inappropriate behaviour. Victimisation of whistle-blowers or complainants will be treated as an additional disciplinary offence.

4. Responsibilities of Senior Leadership

Senior Leadership (Board of Governors, Directors, Provost or equivalent, Academic Managers, Professional Services Managers, Registrar) at William College have a heightened responsibility to model ethical behaviour and to proactively prevent abuse of power within their areas of oversight. Their actions set the institutional tone. The following responsibilities are expected of them:

- **Upholding integrity and accountability:** Senior leaders must operate with honesty and integrity, exemplifying ethical leadership and ensuring concerns can be raised without fear. They must apply rules and standards consistently, including to themselves, and accept personal accountability for compliance with this Code.
- **Compliance with governance standards:** Leaders must ensure William College meets the CUC governance principles and OfS regulatory conditions. They are responsible for oversight structures (committees, audits, etc.) and must address any management gaps that could allow power abuses.
- **Promotion of a safe and respectful environment:** Senior leaders must ensure policies against bullying, harassment, and discrimination are enforced, and that students and staff know their rights. They should champion diversity and inclusion and respond decisively to complaints, reinforcing the College's commitment to a respectful environment.

- **Oversight of Code implementation:** Academic Managers and the Academic Registrar oversee the implementation of the Code, including staff training, ethical guidance, and compliance monitoring. They must ensure decision-making processes have checks and balances to prevent individual misuse of power.
- **Responding to concerns:** Senior leaders must address reports of power abuse promptly and according to this Code’s procedures. Reporting channels must be maintained, concerns tracked, and retaliation prevented. If an allegation involves senior leadership, impartial responses must be ensured through independent oversight.
- **Fit and Proper Leadership:** Senior leaders and governors must meet ethical standards, with background checks and declarations verifying their suitability. If misconduct occurs, their fitness for office must be reviewed, with potential removal or referral to external regulators as appropriate.

William College’s senior leadership is responsible for cultivating an ethical institutional culture and robust systems that prevent abuse of power. By fulfilling these responsibilities, they uphold integrity, ensuring checks and balances are in place at all levels to prevent exploitation of authority.

5. Prevention and mitigation strategies

Preventing abuse of power is as essential as addressing it when it occurs. William College employs proactive strategies to mitigate risks and uphold integrity:

- **Conflict of interest declarations:** Staff, particularly senior leaders and governors, must declare any actual, potential, or perceived conflicts of interest upon appointment and regularly thereafter. The College conducts an annual review requiring self-disclosure of external affiliations, personal relationships, or financial interests that could influence decision-making. Transparency ensures that situations—such as close family employment in the same department or financial stakes in a partnering business—are disclosed and managed appropriately (e.g., recusal from decisions). Failure to report a known conflict may result in disciplinary action.
- **Mandatory training and awareness:** Regular ethics training is provided for all staff and governors, including induction sessions and annual refresher courses. Topics cover anti-bullying and harassment, diversity and inclusion, unconscious bias, and conflict of interest management. This ensures a shared understanding of what constitutes power abuse and how to prevent it.
- **Policy and procedure controls:** Institutional policies incorporate safeguards to prevent abuse of power. Financial oversight measures, such as requiring dual signatories or committee approval for major expenditures, limit unilateral decision-making. Academic safeguards, including second marking and external examiners, ensure fairness in student assessments. Recruitment and promotion panels follow structured, multi-member evaluations to eliminate individual bias. These systemic checks and balances reduce the risk of unchecked authority.
- **Open-door culture and communication:** Leadership fosters an environment where staff and students feel comfortable raising concerns. Open communication is encouraged through feedback forums, ethics discussions, and transparent decision-making. Awareness initiatives—such as posters, email reminders, and intranet resources—reinforce key messages, including “No Bullying Tolerated” and “Speak Up if Something Isn’t Right.” This culture of openness helps prevent misconduct from going unnoticed or unchallenged.

6. Reporting mechanisms and whistleblowing

William College is committed to providing safe, accessible, and trusted channels for reporting any suspected abuse of power. Every member of the College community should feel empowered to report concerns without fear of retaliation. Multiple reporting mechanisms ensure confidentiality and accommodate different comfort levels:

- **Internal reporting channels:** Individuals are encouraged to report concerns through existing managerial or institutional channels whenever possible. This could mean:
 - Line Manager/Supervisor: Report issues to a trusted manager, who is expected to handle concerns with discretion and escalate as needed.
 - Human Resources (HR): Staff members can approach the HR department to report bullying, harassment, discrimination or other abuses. HR can provide advice on next steps and will treat reports sensitively.
 - Student Support Team or Wellbeing Team: Students or staff can report academic misconduct or abuse of power to the designated officer for student complaints.

Reports made through these channels will be handled confidentially and documented according to investigation protocols. If the concern involves the person receiving the report, the individual should use an alternative reporting route (e.g., bypassing a supervisor and going directly to HR or higher management)

- **Anonymous reporting:** William College provides a mechanism for anonymous reporting to protect individuals who fear identification. While anonymous reports are taken seriously, providing sufficient detail is crucial for effective follow-up. The College guarantees anonymity and will not seek to identify whistle-blowers. However, complete anonymity may limit the ability to act, though all reports will inform ongoing monitoring of institutional concerns.
- **Whistleblowing – Protected Disclosures:** Any staff member who raises concerns in good faith is legally and institutionally protected under the UK Public Interest Disclosure Act 1998 (PIDA). This includes disclosures regarding criminal activity, legal breaches, miscarriages of justice, health and safety risks, or misuse of public funds. William College strictly prohibits retaliation against whistleblowers, and any form of victimisation (e.g., demotion, harassment) will result in disciplinary action. Staff may also report concerns externally to regulatory bodies if internal reporting is unsuitable.
- **Confidentiality and support:** All reports, whether named or anonymous, will be treated confidentially and shared only with those responsible for addressing them. Reporters may request updates on the outcome, though privacy obligations may limit specific details. Support services, such as counselling or student support, will be available to those reporting misconduct. William College recognises the challenges of speaking out and is committed to assisting whistleblowers and complainants throughout the process.
- **False or malicious allegations:** While William College encourages everyone to speak up, it also expects reports to be made in good faith. Deliberately false, malicious allegations of abuse of power (that a reporter knows to be untrue) are unacceptable. Such behaviour can damage reputations unjustly and waste resources. If an investigation finds that an accusation was knowingly fabricated, it will be treated as a serious disciplinary matter. (This does not include reports made in error or based on genuine belief – those will not be penalised even if not substantiated.)

By providing multiple avenues – informal or formal, named or anonymous – William College ensures that all concerns can be raised safely. Ethical responsibility is a shared commitment, and reporting wrongdoing helps maintain an accountable and fair institutional culture.

7. Review of the Code of Practice

This Code of Practice is reviewed annually by Senior Leadership Team (SLT). Any amendments require the approval of our Board of Governors.

8. Related Internal Policies and External Reference Points

Internal Policies

- Equality and Diversity Policy
- Data Protection Policy

- Safeguarding Policy
- Harassment and Sexual Misconduct Policy
- Staff Disciplinary Procedure
- Whistleblowing Policy
- Staff-Student Relationships Policy
- Student Complaints Policy

External Reference Point:

- Office for Students (OfS) Regulatory Framework – Public interest governance principles and conditions E2/E3 ([Annex A: Initial and general ongoing conditions of registration - Office for Students](#)) ([Annex B: Public interest governance principles - Office for Students](#)) ([Annex B: Public interest governance principles - Office for Students](#)) (standards for governance, integrity, and fit-and-proper management in higher education providers).
- Equality Act 2010 (UK) – Protected characteristics under the law (grounds on which discrimination is unlawful) ([Equality Act 2010](#)).
- OfS Public Interest Governance Principle on Regularity, Propriety, and Value for Money (proper use of funds and high standards of conduct in public resources) ([Annex B: Public interest governance principles - Office for Students](#)).
- OfS Fit and Proper Persons criterion (leaders must not have been involved in serious misconduct or mismanagement) ([Annex B: Public interest governance principles - Office for Students](#)).

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