

Harassment and Sexual Misconduct Policy

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1. Introduction

This policy is designed to ensure a safe, welcoming and inclusive working and learning environment for all members of the William College community, where all staff and students are equally valued and respected.

William College is committed to ensuring an environment which values and respects the rights and dignity of all members of the College community. It is committed to an environment that is free from any forms of bullying, harassment, discrimination or violence and in which unacceptable behaviours are actively challenged and addressed.

The College has a deep commitment to ensuring all students are treated in an equitable way and that the diversity of its student body is valued, protected and supported in line with its Equality and Diversity Policy.

Any forms of bullying, harassment, discrimination, or violence can have an extremely negative and lasting impact on individuals and on the broader College community. As well as preventing students from achieving their potential, such behaviour can jeopardise the mental, physical and emotional wellbeing of those affected.

The negative impact of this behaviour can result in our community members feeling humiliated, unsafe, stressed, nervous, vulnerable, depressed, and unable to engage with work or studies.

William College expects all relationships and interactions to be grounded in mutual respect, open communication and clear consent and this policy is based on these principles and practices.

The College will strive to ensure that those implementing this policy approach disclosures of any forms of bullying, harassment, discrimination, or violence sensitively, impartially and with discretion. It will also seek to work with external experts to enhance the implementation and effectiveness of its approach to instances of any forms of bullying, harassment, discrimination, or violence.

The College is committed to supporting any student who has been the victim of any form of bullying, harassment, discrimination, or violence from another student, a member of staff or an individual not connected with the College. Where a disclosure or report of bullying, harassment, discrimination, or violence has been made the College will take steps to ensure the reporting party's physical safety and to facilitate their access to specialist support and academic advice services within the College and/or externally.

2. Purpose and Scope

The purpose of this Policy is to safeguard William College community by clearly defining unacceptable behaviours and establishing procedures for support, reporting, and investigation. It is intended to create an environment where all individuals have the opportunity to fulfil their potential without unnecessary barriers. It also covers:

- any incident that occurs on William College premises or during a William College related activity. This would include teaching, social events and other activities.
- Any incident occurred/occurring via William College's IT systems (e.g. Virtual Learning Environment, email).
- Any incident occurring online (regardless of whether or not William College systems are used) e.g. via email, the internet or social media.

This policy applies to all William College staff and students (both current and prospective), and external consultants engaged in work commissioned by William College.

Bullying, harassment and sexual misconduct (which includes sexual harassment) are unacceptable behaviour and will not be tolerated. These behaviours are contrary to the Equality Act 2010; the

Protection from Harassment Act 1997; and the Workers Protection Act 2024, and to William College's values and mission.

Breaches of this policy by staff or students will be investigated under the relevant disciplinary procedure which may result in dismissal or expulsion and referral to the police. Breaches by third parties will be dealt with appropriately and may be referred to security and/or the police.

3. Definitions

- **Discrimination:** the Equality Act 2010 states that it is against the law to treat any person unfairly or less favourably based on a protected characteristic. The 9 protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including ethnic origin, nationality and colour), religion or belief, sex and sexual orientation.
- **Violence:** extremely forceful actions that are intended to hurt individuals physically or cause damage to property.
- **Consent:** Consent is the agreement to participate in a sexual act where the individual has both the freedom and capacity to make that decision. Consent cannot be assumed on the basis of previous sexual experience or previously given consent, or from the absence of complaint. Consent may be withdrawn at any time.
- **Freedom to consent:** for consent to be present, the individual has to freely engage in a sexual act. Consent cannot be inferred from a lack of verbal or physical resistance. Consent is not present when an individual unwillingly submits in response to the exploitation of power, or coercion or force or lacks the capacity to consent regardless of whether or not there is verbal or physical resistance.
- **Capacity to consent:** Incapacitation may occur when an individual is asleep, unconscious, or in any other state of unawareness that a sexual act may be occurring. A person may also not have capacity to give consent if they have, for example, a cognitive or learning difficulty, a disability which impairs their speech, or are experiencing a mental health crisis.
- **Incapacitation** may also occur on account of an impairment of or a disturbance in the functioning of, the mind or brain (whether permanent or temporary), or as the result of alcohol or substance use. signs of incapacitation may include, but are not limited to, one or more of the following: slurred speech, unsteady gait, bloodshot eyes, dilated pupils, unusual behaviour, blacking out, a lack of full control over physical movements, a lack of awareness of circumstances or surroundings, and/or an inability to communicate effectively. **Intoxication** is never a defence for committing an act of Sexual Violence and Misconduct, or for failing to obtain consent. If there is any doubt as to the level or extent of one's own or the other individual's incapacitation, the safest approach is to not engage in a sexual act.
- **Abuse of power** is where a position of power or authority is used in an unacceptable manner. This can take various forms and may include, but is not limited to, grooming, manipulation, coercion and pressurising others to engage in conduct they do not feel comfortable with. Abuse of power may also occur in the context of a close personal or intimate relationship.
- **Bullying:** [ACAS](#) defines bullying as characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone, in other words, it can be physical, verbal or psychological. Bullying usually involves a repeated course of conduct.
- **Harassment** is defined in the Equality Act 2010 as unwanted behaviour or conduct related to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. This behaviour (which does not need to be deliberate) may be persistent or occur as an isolated incident. In addition, a person does not need to have previously objected to something for it to be unwanted. Harassment can also include repeated contact with a person that may cause distress, fear or intimidation. The unwanted conduct can be physical, verbal or non-verbal.

- **Hate crime:** The above definition of harassment can be extended to hate crime which the [Home Office](#) defines as 'any criminal offence which is perceived, by the victim or any other person, to be motivated by hostility or prejudice towards someone based on a personal characteristic.'

There are five centrally monitored strands of hate crime and these are:

- race or ethnicity
- religion or beliefs
- sexual orientation
- disability
- transgender identity

A hate crime can include verbal abuse, intimidation, threats, harassment, assault and bullying, as well as damage to property. The perpetrator can also be a friend, carer or acquaintance who exploits their relationship with the victim for financial gain or some other criminal purpose. Examples of hate crime include Islamophobia and/or homophobia.

- **Sexual misconduct** is a form of harassment and is unacceptable behaviour of a sexual nature. It can include sexual harassment (as defined below); sexual violence; intimate partner violence; sexual assault; grooming; coercion or bullying with sexual elements; sexual invitations and demands; sexual comments; sexual non-verbal communication; creation of atmospheres of discomfort; and promised resources or advancement in exchange for sexual access.

Sexual misconduct relates to all unwanted conduct of a sexual nature. This includes, but is not limited to:

- Sexual harassment (as defined by Section 26 (2) of the Equality Act 2010)
 - Unwanted conduct which creates an intimidating, hostile, degrading, humiliating or offensive environment (as defined by the Equality Act 2010)
 - Assault
 - Rape
 - Physical unwanted sexual advances (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)
 - Intimidation, or promising resources or benefits in return for sexual favours (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)
 - Distributing private and personal explicit images or video footage of an individual without their consent (as defined by the Criminal Justice and Courts Act 2015)
- **Sexual Harassment:** under the Equality Act 2010, sexual harassment is defined as unwanted conduct of a sexual nature that has the purpose or effect of violating the dignity of an individual, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Something can still be considered sexual harassment even if the alleged harasser did not mean for it to be. It also does not have to be intentionally directed at a specific person. Sexual misconduct relates to all unwanted conduct of a sexual nature that is committed without consent or by force, intimidation, coercion or manipulation such as sexual assault, sexual harassment, sexual exploitation and sexual intimidation.

Sexual harassment and sexual misconduct or violence can happen to anyone - men, women and individuals of any gender or sexual orientation. In most cases, sexual violence is perpetrated by someone known and even trusted (like a friend, colleague, family member, partner or ex-partner), but it can also be perpetrated by a stranger. A person can be sexually harassed even if they are not the intended target.

- **Grooming:** Grooming can be defined as a gradual process that someone in a position of power uses to manipulate someone to do things they may not be comfortable with and to make them less likely to reject or report abusive behaviour. Grooming will initially start as befriending someone and making them feel special and may result in sexual abuse and/or exploitation.

- **Coercion or Force:** includes any physical or emotional harm or threat of physical or emotional harm which would reasonably place an individual in fear of immediate or future harm, with the result that the individual is compelled to engage in a sexual act.
- **Stalking:** Following a person, watching or spying on them or forcing unwanted contact with the victim through any means, including social media. The effect of such behaviour is to curtail a victim's freedom, leaving them feeling that they constantly have to be careful. In many cases, the conduct might appear innocent (if it were to be taken in isolation), but when carried out repeatedly to amount to a course of conduct, it may then cause significant alarm, harassment or distress to the victim.
- **Victimisation:** Treating someone less favourably because they have made a claim or complaint of discrimination, or helped someone else to make a complaint (under the Equality Act), or made a disclosure (whistleblowing) under the Public Interest Disclosure Act 1998, or in either case the affected person is believed to have made or helped make, or is believed that they may make or help make, a complaint or disclosure. Where William College becomes aware of victimisation taking place, this may lead to disciplinary action.
- **Complicity** is any act that knowingly helps, promotes, or encourages any form of Sexual Misconduct or unacceptable behaviour.
- An **adult with care and support needs** or **adult at risk** – to whom safeguarding duties apply – is a person aged 18 or over who has needs for care and support (whether or not the local authority is meeting any of those needs); is experiencing, or is at risk of, abuse or neglect; and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- **Disclosure:** the act of an individual speaking to a Wellbeing Officer about their experiences in order to access support. Unlike Reporting (see definition below), disclosure does not trigger an investigation or action (unless the College has a safeguarding obligation), but it may lead to support being offered.
- **Reporting:** the act of an individual making an official complaint against a fellow student or member of staff of William College regarding an incident of bullying, harassment or sexual misconduct experienced by that individual. This will initiate the investigation process set out in this Policy and the accompanying procedure (different from *Disclosure*).
- The **Reporting Party** is the person(s) who witnessed or was subject to the alleged incident of harassment or sexual misconduct.
- The **Reported Party** is the person(s) whose behaviour it is alleged amounted to an incident of harassment or sexual misconduct.

4. The College's commitment

Williams College is dedicated to providing an environment where all students can study and work in a setting that promotes harmonious relationships. Our goal is to sustain behavioural and cultural change, inspire and educate students to ensure legal compliance, and embed inclusivity across our campuses. This includes encouraging good relations, promoting a culture of respect, and eliminating bullying, sexual misconduct, harassment, or hate crime.

Any allegations of harassment and bullying will be treated seriously and may result in disciplinary action. Williams College ensures that any student raising a genuine concern will not be victimised. All allegations, whether informal or formal, will be handled sensitively and objectively, respecting the rights of all parties involved. Any information received will be treated confidentially, with personal information shared only to ensure policy compliance.

Williams College is committed to preventing bullying, harassment, and sexual misconduct. We provide educational and preventative initiatives for both staff and students, timely support for those affected, and

prompt, equitable investigation and resolution methods to stop misconduct, remedy harm, and prevent recurrence.

All staff and students share the responsibility of ensuring a working and studying environment where everyone is treated with respect and dignity. Each individual is expected to contribute to preventing unacceptable behaviours through self-awareness, modelling positive behaviour, and raising concerns.

All staff at William College, in both academic and professional services roles, are in positions of trust and must demonstrate exemplary behaviour.

This includes student mentors, and any other staff member that is directly involved in teaching and learning, research supervision, or any other formal duties that involve assessing, grading, or mentoring students as well as students undertaking paid work.

Actions can be misinterpreted, so consideration should always be given to what constitutes appropriate conduct.

Harassment can take multiple forms and may occur alongside other discrimination. It may include images, graffiti, spoken or written words, physical gestures, facial expressions, sexist or racist "banter," jokes, or telephone communications. Harassment may also occur electronically via email, or social media comments. Cyber-bullying, sexual harassment, racial harassment, Islamophobia, and Homophobia are all forms of harassment.

Sexual harassment may include sexual comments or jokes, unwelcome advances, gesturing, or remarks about someone's body, clothing, or appearance. It also includes inappropriate touching, sexual assault, intrusive questions about someone's intimate life, displaying sexually explicit images, or sending sexual content via email.

Harassment may be committed by an individual or a group. Some examples of unacceptable behaviour, including harassment and sexual misconduct, are included in Appendix A.

Any allegations of harassment and bullying will be treated very seriously and could result in disciplinary action being taken against the perpetrator. William College will ensure that any student raising a genuine concern in relation to this policy will not be victimised. All allegations of bullying, harassment, or victimisation, whether informal or formal, will be regarded as a serious matter and will be dealt with in a sensitive, objective manner, respecting the rights of all parties involved.

Any information received will be handled with an appropriate level of confidentiality. Where personal information is shared or released, it will only be done for the purposes of ensuring compliance with this policy and associated procedures.

4.1 Governance and accountability

Our Board of Governors is responsible for actively promoting and applying equality, diversity and inclusion throughout William College, and also promoting an inclusive teaching and learning environment. This responsibility is clearly articulated within our Articles of Association and our Management and Governance Framework.

Consequently, our Board of Governors is responsible for ensuring that our approach to harassment and sexual misconduct is adequate and effective by ensuring that risks relating to these issues are identified and effectively mitigated in line with the Office for Students and the [Committee of University Chairs' Practice](#).

To assist in the effective discharge of its duties in the area of equality, diversity and inclusion, the Board has established a sub-committee of the Board, namely our Equality, Diversity and Inclusion Committee.

The EDI Committee has a number of responsibilities including:

- determining the College's strategic direction in relation to equality, diversity and inclusion, and ensuring this is articulated within the company's Equality and Diversity Policy, and reflected within all other policies and procedures.

- actively promoting, applying, and ensuring compliance with the company's Equality and Diversity Policy, and ensuring the Policy is reviewed annually.

Accountability for compliance with the Equality Act 2010 and our own related internal policies is achieved through the following mechanisms:

The minutes of the EDIC are submitted to the Board of Governors, the Senior Leadership Team, the Academic Board for consideration and action.

An annual Equality, Diversity and Inclusion Report as well submitted to the Board of Governors, for consideration and action. The update report will include reporting on the types of cases and incidents of harassment and sexual misconduct, and trends and outcomes of cases should we experience any. This will provide an opportunity for the review and discussion of preventative measures and their impact on students. The content of these reports will be subject to data protection considerations and will inform the review of this policy and relevant procedures.

4.2 Our ethos and practice

At William College, we cultivate an inclusive environment that values diversity, enabling staff and students to reach their full potential, contribute meaningfully, and enjoy their experience. We believe dignity and respect are fundamental rights for all current and prospective community members, and we are committed to maintaining a safe environment. Our stance on harassment and sexual misconduct is outlined in key policies and documents, including the Student Code of Conduct, Equality, Diversity and Inclusion Policy and Staff Relationships Policy.

Our commitment is reflected in mandatory staff training, including online courses on Equality, Diversity, and Inclusion, Bullying and Harassment, Sexual Harassment, and Unconscious Bias. All staff must complete these within a month of joining and annually thereafter.

Beyond compulsory training, staff will be provided with additional sessions based on assessed needs and role responsibilities. General training focuses on awareness-raising to prevent harassment and sexual misconduct and encourage disclosures. Specialist training will be offered to designated staff on handling disclosures effectively, particularly in cases that may lead to criminal proceedings. Further training will also be available for those providing support to all parties involved.

The Wellbeing Team conducts safeguarding workshops for new staff, tailored for Academic and Professional Services staff. Topics include identifying bullying and harassment, handling conflicts, supporting colleagues and students, and accessing available resources.

During induction, students are provided with key information in sessions led by the Wellbeing Team, which outline acceptable behaviour on campus, offer details on available resources, and explain the procedures for reporting incidents or seeking support within the College. For those unable to attend the initial induction, the Wellbeing Team organises smaller sessions after the term has begun to ensure they receive the necessary information. Additionally, the Wellbeing Team conducts workshops throughout the academic year on topics related to harassment, bullying, and student wellbeing, reinforcing the College's commitment to fostering a safe and supportive environment.

Through Student Representative meetings we encourage open communication, creating a more responsive, transparent, and supportive learning environment where students can actively participate and engage as valued members of the College community.

5. Responsibilities

All staff members and line managers have a collective responsibility to uphold this policy by actively promoting a safe environment, promptly addressing concerns, and supporting individuals affected by harassment or misconduct.

William College will actively respond to all reports of sexual harassment and misconduct, whilst recognising that some experiences may constitute a criminal offence, we will ensure that, in all cases, reports are carefully and thoughtfully addressed by relevant staff members through a process that is transparent and clearly communicated to the individuals involved.

William College's Student Representative meetings play an important role to consider matters with regards to the general student experience. Student Representatives are responsible for delivering messages to the wider student body in relation to our zero-tolerance policy and the possible consequences and actions that we will take regarding harassment, bullying and sexual misconduct.

5.1 Expectations of all members of William College community

The College has the following aims in respect of this policy and procedure:

- To promote a positive environment in which all members of the community are treated fairly and with respect.
- Take a zero-tolerance approach to any forms of harassment and bullying.
- Ensure all members of William College community, including all students, staff, visitors and contractors understand their responsibility to contribute to the creation and maintenance of an environment free from harassment and bullying.
- Provide a framework of support for students and for all parties involved in any complaints and/or allegations.
- Provide a mechanism to resolve concerns and issues raised. Every effort will be made to encourage individuals to resolve the matter informally, or failing that, at the lowest possible level through the formal procedures.

5.2 Expectations of all students at William College:

- Not perpetrate any form of harassment, bullying sexual violence and/or misconduct.
- Seek consent when interacting with others.
- Act appropriately in the work/study environment.
- Be an active bystander.
- Respond in a thoughtful and supportive way to disclosures.

6. Support

We will deal with any allegations of harassment or sexual misconduct in a sensitive and objective manner. We are therefore committed to supporting both the Reporting Party and the Reported Party in any alleged incident of harassment or sexual misconduct regardless of whether a formal report or complaint is made. This support may be of an emotional nature or a practical nature (e.g. measures to manage contact between the two parties). In addition, this support will be available not only at the reporting stage, but throughout any formal investigation, and following its outcome, as appropriate.

Details of the support available within William College is provided below. However, we will also signpost or refer students to external sources of support or reporting channels where appropriate e.g. the police, NHS, sexual assault referral centres or hate crime reporting centres, or to local specialist services such as Rape Crisis, if specialist support is needed. See **Appendix B** for details of external sources of support and reporting mechanisms.

Staff within our Wellbeing Team are available to provide mental health and wellbeing support. All Wellbeing staff are trained in Mental Health First Aid.

6.1 Support for Students

At William College, we are committed to ensuring students have access to the necessary support and resources when dealing with harassment or sexual misconduct. Our Wellbeing Team as well as the Safeguarding Leads offers confidential advice and support, providing a safe space for students.

The Wellbeing Team plays a key role in the students' journey. Students experiencing harassment or sexual misconduct—whether on or off campus—is encouraged to speak to a Wellbeing Office for support. One-on-one support sessions are available at any time during campus hours for guidance.

When a safeguarding concern is raised, the Designated Safeguarding Officer (DSO) will promptly arrange a meeting with the affected student to assess their needs, provide appropriate support, and ensure that the campus remains a safe environment for them. Following this, the Wellbeing Team will take responsibility for offering ongoing mental health and wellbeing support, ensuring the student has access to necessary resources, including academic assistance if their studies have been impacted. A tailored response will be developed to address the student's specific situation, helping them feel supported and confident in continuing their education.

Further links and resources are made available to students through the Virtual Learning Environment (Moodle), including self-help resources and information on external support services and charities. The Wellbeing Team can assist students in filing a police report if necessary. William College will not contact the police without the student's consent unless there is a serious risk of harm to the student or someone else. In deciding whether to make such a disclosure, William College will take into account any potential harm that the unauthorised disclosure may cause to the victim.

Students have access to an external platform [TogetherAll](#); which provides a range of tools and resources covering different topics, including such as bullying, harassment, and mental health.

Further information on Wellbeing generally can be found here: [William College - Shaping Tomorrow's Leaders through Education](#)

6.2 Support for Staff

Staff are encouraged to speak in confidence with their Line Manager or the HR Manager for initial advice and support on available options. Providing timely and confidential support to all members of staff who have experienced or been accused of harassment or sexual misconduct is key to our commitment.

Staff can access support through their line manager and Human Resources (HR). The College also offers a 24-hour Employee Assistance Programme, currently provided through [MYMINDPAL](#), which includes mental health counselling, wellbeing resources, and confidential advice. Staff may be referred to Occupational Health services, for sustained or serious cases as well as external specialist organisations, including those supporting survivors of sexual violence and harassment.

In cases involving formal investigations or disciplinary processes, staff may be offered:

- A named liaison officer to support and guide them through the process
- The right to be accompanied at meetings
- Reasonable workplace adjustments to support their physical and psychological wellbeing

Staff may also wish to seek support from legal representatives, Staff Reps, or external advocacy organisations, particularly if they are subject to or involved in formal procedures.

The College will ensure a consistent approach to support for both reporting and reported parties, in line with principles of natural justice, and will periodically review the effectiveness of staff support through feedback and case reviews

7. Case Management Process

William College understands the importance of handling serious student misconduct cases fairly and effectively. However, cases can be incredibly complex with each one requiring consideration of unique circumstances, a need to balance the interests of the students involved and, often, the navigation of an external criminal investigation.

Harassment is not always easily identified or easy to deal with. It is advisable to keep a record of incidents that bother you, including time, date, circumstances, names of witnesses and how you felt at the time. You may also wish to consider taking actions.

Individual action:

If possible, the individual should clearly communicate to the person responsible for the offense that the behaviour is unacceptable and request that it stop. In some cases, this may be sufficient to resolve the situation. If the individual feels unable to address the person directly, or if the behaviour continues despite having spoken to them, it is advisable to keep a record of details, including dates, times, circumstances, and witnesses, as well as any ways in which the incidents have led to changes in work patterns.

7.1 Informal Reporting

An individual experiencing bullying, harassment, or sexual misconduct under this policy may opt to handle the situation informally.

Informal reporting may include direct resolution, mediation, or support from the Wellbeing Team or HR team. This process is aimed at resolving the matter quickly and without the need for a full investigation, unless escalated by the affected person.

Williams College acknowledges that the affected person has the right to choose their preferred resolution method and affirms that pursuing informal resolution does not prevent them from filing a formal complaint later.

For Students:

Students who feel unable to take individual action, or who find that doing so has not resolved the issue, are encouraged to seek informal support from the Wellbeing Team or the Designated Safeguarding Officer (DSO). Any discussion will remain confidential, and no further action will be taken without the student's permission unless their safety or the safety of others is at risk, in which case they will be fully involved in the process. If further action is necessary, the individual providing support will typically continue to assist throughout the process.

If an informal discussion does not resolve the issue, the student and their supporter should consult with the Provost or equivalent responsible for academic issues for further guidance. If the concern involves a member of staff, the Director of Human Resources will also be involved. The matter may then be resolved informally or, if necessary, formalised with the student's consent.

If the reported student is informed that their actions could be perceived as bullying, harassment, or sexual misconduct, they should listen attentively and calmly. While the conversation may be difficult, they should allow the other party to share their concerns and, if possible, work toward a mutual understanding to restore a positive learning or working environment. In cases where the complaint is serious or inappropriate, students should seek guidance from the Wellbeing Team or the Designated Safeguarding Officer to determine the appropriate next steps.

For Staff members

Staff who feel unable to take individual action, or who find that doing so has not resolved the issue, are encouraged to seek informal support from their Line Manager. Any discussion will remain confidential, and no further action will be taken without the staff member's permission unless their safety or the safety of others is at risk, in which case they will be fully involved in the process. If further action is necessary, the individual providing support will typically continue to assist throughout the process.

If an informal discussion does not resolve the issue, the staff member and their supporter should consult with the Human Resources team. The matter may then be resolved informally or, if necessary, formalised with the staff member's consent.

If the reported staff member is informed that their actions could be perceived as bullying, harassment, or sexual misconduct, they should listen attentively and calmly, allowing the other party to share their concerns and working, if possible, toward a resolution that fosters a positive work environment.

In cases where the complaint is serious or inappropriate, the reporting staff member should seek guidance from their Line Manager and HR to determine appropriate next steps.

7.2 Formal Reporting

Students who feel they have experienced or witnessed bullying, harassment or sexual misconduct by another student or a member of staff on campus or in any other College-related activities, are encouraged to reach out to the Wellbeing Team in person, via email at wellbeing@williamcollege.com or submit concerns through the [In Need](#) form.

Members of staff who feel they have experienced or witnessed bullying, harassment or sexual misconduct can contact HR at hr_wc@williamcollege.com and make a formal complaint. Staff members can also use the [In Need](#) form.

Self-help resources are provided by the Wellbeing team, and students can find more resources and external reference points on Moodle and on the website at [William College - Shaping Tomorrow's Leaders through Education](#).

7.3 Investigating a formal report

Where a formal report of harassment or sexual misconduct is submitted, the College will ensure that review of the report and investigations will be conducted in accordance with William College's policies, ensuring confidentiality and fairness for all parties involved. These investigations are conducted by the Safeguarding Leads and/or HR.

William College prohibits the use of non-disclosure agreements (NDAs) to resolve or conceal allegations of harassment or sexual misconduct. Any agreement that limits an individual's ability to report such incidents or share their experiences—either during or after the resolution process—is not allowed. Any attempt to enforce an NDA in cases of sexual harassment will result in immediate disciplinary action.

Depending on the nature of the concern or complaint, different policies may apply:

- Student complaint against a student – the Student Complaints Policy will apply. Such complaints may be referred to the Student Disciplinary Policy at the discretion of Designated Safeguarding Officer.
- Student complaint against a staff member – the Staff Disciplinary Policy will apply.
- Staff member complaint against a student – the Student Disciplinary Policy will apply
- Staff member complaint against a staff member – the Staff Grievance Policy. Following an investigation, a grievance may be referred to the Staff Disciplinary Policy.

As part of the management of the case, the DSO will seek to identify appropriate support for the Reporting Party and assist she/he to obtain that support. This is likely to include the provision of support from the William College and/or from external specialists such as Rape Crisis.

The Designated Safeguarding Officer (DSO) The DSO will form investigation panel, and both the reporting and reported parties will be:

- Notified in writing of the allegation and process
- Offered a named liaison officer for support throughout
- Provided with the opportunity to respond
- Advised of their right to be accompanied at any formal meeting

All staff involved in the investigation process will have received appropriate training in:

- Trauma-informed practice
- Harassment and sexual misconduct procedures
- Unconscious bias and equality legislation

Normally this process will include:

- A review of the report submitted.
- An investigation into the situation.
- One or more meetings with the reporting and responding parties.
- One or more meetings with witnesses to the incident, where relevant.
- One of more Case Panel meetings involving DSO and relevant College staff.

Breaches of the Student Code of Conduct involving students are typically resolved informally by the Wellbeing team, ensuring all parties reach a satisfactory resolution. More serious concerns prompt the involvement of Campus Operations and may lead to disciplinary actions, warnings, or, in extreme cases, student withdrawal.

For staff-related matters, HR is immediately informed, ensuring confidentiality and appropriate measures, including potential suspension or dismissal.

Investigations involve witness interviews, evidence review, including but not limited to CCTV and digital communications, and safeguarding assessments.

To note: CCTV records are stored for a period of 30 days unless required longer for investigative purposes. Any request should be made within the 30 days period.

Investigations will ordinarily be completed within 60 calendar days, where possible, although this may vary depending on the circumstances of the case.

Both parties will be informed of the outcome in writing and of any actions taken.

Where relevant, the College may also:

- Refer cases to the police or external agencies
- Temporarily adjust timetables or work arrangements to protect wellbeing during the process
- Take interim measures such as no-contact agreements

If legal action is required, HR will provide guidance on the necessary steps. Following any significant incidents, the DSO and members of the Senior Leadership Team will conduct a procedural review to assess potential improvements in safeguarding measures.

A summary of anonymised cases may be used to inform policy and training improvements and will be included in annual safeguarding and EDI reports.

7.4 Outcomes

Where a complaint has been made about a student or a member of staff, we will provide the Reporting Party and Reported Party with an outcome of the investigatory process where we are able to share this information. Additionally we will offer an explanation of any actions we have taken, or not taken, based on the information provided by the Reporting Party.

Investigations will ordinarily be completed within 60 calendar days, where possible, though this may vary depending on the circumstances of the case. Both parties will be informed in writing of the outcome and any actions taken. However, it may not be appropriate to share specific details affecting the Reported Party, particularly in cases where disciplinary action is being taken.

If the outcome of the process changes, we will inform both parties accordingly.

Outcomes may include:

- No further action be taken.
- Adjustments to be put in place to limit contact between the reporting and reported parties.
- The Reported Party is required to undertake a course and/ or other training to encourage positive behaviour change and awareness of issues surrounding consent, sexual misconduct, harassment, bullying, racism, homophobia, as appropriate.
- The Reported Party is required to provide a written apology addressed to the Reporting Party.
- The Reported Party be referred to another policy – normally the Student Disciplinary Policy or Staff Disciplinary Policy.
- The Reported Party be withdrawn from the programme of study.
- The Reported Party be suspended or terminated.

7.5 Anonymity

While William College strives to create an environment where individuals feel safe to make a complaint, there may be situations where a student, staff member, or anyone engaging with the College prefers to report their experiences anonymously.

Making an anonymous report can be an empowering choice, and the College treats all information regarding unacceptable behaviour within its community with the utmost seriousness.

Submitting a report anonymously ensures that the identity of the reporting individual remains unidentified. Any information provided will be kept private unless the College determines that there is a significant safety risk to the person reporting or others.

In most situations, the College may not be able to take direct action against specific individuals based solely on anonymous reports. However, if a report contains identifying details and highlights serious safety concerns, the College may take appropriate steps to safeguard those involved.

Anonymous reporting increases the College's ability to obtain a true picture of what is happening and to pro-actively identify actions. Data collected from anonymous reports will primarily be used to assess policies, implement broader initiatives that benefit the community, and help prevent instances of harassment.

8. False reporting

Any instances where reports or concerns are raised with malicious intent or in a vexatious manner will be taken seriously and may lead to disciplinary action against the individual making the false disclosure.

9. Confidentiality

We will deal with complaints on a confidential basis in line with relevant legislation and internal policies (e.g. Data Protection Policy) but may need to disclose details of a complaint to other persons or organisations in order to investigate the complaint and seek an effective resolution, and also to safeguard members of our academic community.

10. Review of the Policy

This Harassment and Sexual Misconduct Policy is reviewed annually by the Equality, Diversity and Inclusion Committee. Any amendments require the approval of our Board of Governors.

11. Related Internal Policies and External Reference Points

Internal Policies

- Student Code of Conduct
- Equality and Diversity Policy
- Data Protection Policy
- Safeguarding and Prevent Policy
- Academic Freedom and Freedom of Speech Code of Practice
- Abuse of Power Code of Practice
- Staff Disciplinary Procedures
- Staff Grievance Procedures
- Staff-Student Relationships Policy
- Student Complaints Policy
- Student Disciplinary Policy

External Reference Point:

- Equality Act 2010
- Equality and Human Rights Commission: Sexual harassment and the law, 2017
- The Criminal Justice and Courts Act 2015
- The Sexual Offences Act 2003
- Protection from Harassment Act 1997

- Workers Protection Act 2024

March 2025

Appendix A: Unacceptable Behaviour

Harassment and sexual misconduct can sometimes be hard to recognise as what one person might consider acceptable behaviour might be deemed as completely unacceptable by another.

The following are clear examples of unacceptable behaviour:

- Physical assault
- Threats of physical assault
- Offensive conversations, texts, calls or social media posts
- Threat of offensive conversations, texts, calls or social media posts
- Verbal abuse/insults
- Abusive gestures and offensive 'jokes' or 'banter'
- LGBTQ+ insults
- Faith-based insults or slurs
- Engaging or attempting to engage in a sexual act with another individual without consent.
- Sexually touching another person without their consent.
- Conduct of a sexual nature which creates (or could create) an intimidating, hostile, degrading, humiliating, or offensive environment for others including making unwanted remarks of a sexual nature.
- Inappropriately showing sexual organs to another person.
- Repeatedly following another person without good reason.
- Recording and/or sharing images or recordings of another person without their consent.
- Arranging or participating in events aimed at degrading or humiliating those who have experienced sexual harassment, misconduct or violence, for example inappropriately themed social events or initiations.
- Any conduct which constitutes a criminal offence
- Spreading malicious rumours, or insulting someone by word or behaviour
- Ridiculing or demeaning someone – picking on them or setting them up to fail
- Exclusion or victimisation
- Bullying or any form of harassment
- Any form of discrimination
- Overbearing supervision or other misuse of power or position
- Making offensive jokes or derogatory or stereotypical remarks, or mocking, mimicking or belittling a person's protected characteristic,
- Verbal harassment such as whistling, catcalling, sexual comments, sexual innuendo, telling sexual jokes and stories, spreading rumour about a person's sex life;
- Unwelcome sexual advances – standing too close, touching and various forms of sexual assault
- Display of offensive materials e.g. pictures, photos or drawings of a sexual nature.
- Asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected.
- Sending emails with a sexual content.
- Making sexual gestures.
- Revenge porn.
- Indecent exposure.
- Intimidation e.g. threats of violence, misuse of power or position.
- Stalking
- "Grooming" behaviour, for example befriending someone in order to be able to manipulate them to do things with which they are not comfortable, or which are in breach of our policies and procedures
- Racist behaviour, which can include (but is not limited to) making racist jokes, name calling, making assumptions about someone based on their race or religion, racial harassment (for example, anti-Semitism or islamophobia) or racialised micro-aggressions.

The above list is not exhaustive.

Appendix B: External Support and Reporting

If you are in immediate danger, you should contact the emergency services on 999.

For non-emergency enquiries, you can call 101.

See below a list of external support:

Collaborative Partners		
Bath Spa University	https://reportandsupport.bathspa.ac.uk/	Different support links
Hate Crime		
Stop Hate UK	https://www.stophateuk.org/ 24-hour helpline: 0800 138 1625	Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.
True Vision	http://report-it.org.uk/your_police_force	True Vision provides an opportunity to report hate crimes online without having to visit a police station to report.
Tell Mama (Anti-Muslim hate crime)	https://tellmamauk.org/ 0800 456 1226 info@tellmamauk.org	Tell Mama is an independent and confidential support service for those who face anti-Muslim hatred across the UK.
Community Security Trust (Antisemitic hate crime)	https://cst.org.uk/ 24-hour reporting line: 0800 032 3263	CST has a dedicated team that deals with antisemitic incidents and provides victim support, while respecting confidentiality at all times. CST contact the police directly on your behalf if you do not want to.
GALOP (Anti-LGBTQ+ hate crime)	http://www.galop.org.uk/ National LGBTQ+ Domestic Abuse Helpline: 0800 999 5428 LGBT+ Hate Crime Helpline: 020 7704 2040	Galop supports LGBTQ+ people who are victims of domestic abuse, sexual violence, hate crime, so-called conversion therapies, honour-based abuse, forced marriage, and other forms of abuse.
Disability Rights UK	https://www.disabilityrightsuk.org/helplines	Disability Rights UK has a disabled students' helpline, providing advice to disabled students studying in England. They also campaign to improve disabled people's rights and to tackle hostility, bullying and hate crime
Rape and Sexual Assault		
Rape Crisis (for women)	https://rapecrisis.org.uk/ Helpline: 0808 802 9999 Available every day of the year between 12pm – 2.30pm and 7pm – 9.30pm. Live online chat service is also available.	Rape Crisis offers confidential emotional and specialist support for victims and survivors of sexual violence.

The Havens	https://www.thehavens.org.uk/ 020 3299 1599 (9am-5pm, Mon-Fri) Camberwell Haven (near King's College Hospital) Whitechapel Haven (near Royal London Hospital) Paddington Haven, near to St Mary's Hospital	There are three centres in London for patients who have been raped or sexually assaulted in the past 12 months.
Survivors UK (for men)	https://www.survivorsuk.org/ Tel: 02035983898 Online chat is also available	Support and help for male survivors of sexual violence including counselling and therapy appointments
Domestic abuse and violence		
Refuge (for women and children)	https://www.refuge.org.uk/ Domestic Violence Helpline: 0808 200 0247 (24-hour freephone) www.nationaldahelpline.org.uk (Live chat available Monday to Friday 3 pm to 10pm)	Refuge supports women and children who experience all forms of violence and abuse, including domestic violence, sexual violence, female genital mutilation, forced marriage, so-called 'honour'-based violence, and human trafficking and modern slavery.
Women's Aid (for women)	https://www.womensaid.org.uk/ / Email: helpline@womensaid.org.uk A live chat service is also available.	
ManKind For men	https://www.mankind.org.uk/ Helpline: 01823 334244 (weekdays, 10am – 4pm)	ManKind provides a confidential helpline for male victims of domestic abuse and domestic violence across the UK as well as their friends, family, neighbours, work colleagues and employers. They provide an information, support and signposting service to men suffering from domestic abuse from their current or former wife, partner (including same-sex partner) or husband.
Victims of Crime		
Victim Support	https://www.victimsupport.org.uk/ Helpline: 08 08 16 89 111 (free calls) 24 hours a day, 365 days a year.	Victim Support helps people affected by all types of crime. It provides free confidential support for people affected by crime and traumatic events — regardless of whether they have reported the crime to the police or when it occurred and for as long as it is needed.

Citizens Advice	https://www.citizensadvice.org.uk/	Citizens Advice has more information about what you can do if you have experienced, or know someone who has experienced, a hate incident or crime.
The Samaritans	https://www.samaritans.org/how-we-can-help/contact-samaritan/	general support line for anyone to talk to at any time.