

Harassment and Sexual Misconduct Policy



Index

<u>1.</u>	<u>Introduction</u>	<u>3</u>
<u>2.</u>	<u>Scope</u>	<u>3</u>
<u>3.</u>	<u>Definitions</u>	<u>3</u>
	3.1 Harassment	3
	3.2 Sexual harassment and sexual misconduct	4
	3.3 Consent	5
	3.4 Victimisation	5
	3.5 Parties	5
<u>4.</u>	<u>Forms of harassment and sexual misconduct</u>	<u>5</u>
<u>5.</u>	<u>Our approach</u>	<u>6</u>
	5.1 Our commitment	7
	5.2 Governance and accountability	7
<u>6.</u>	<u>Training</u>	<u>8</u>
	6.1 All staff	8
	6.2 All students	9
<u>7.</u>	<u>Awareness</u>	<u>9</u>
<u>8.</u>	<u>Responsibilities</u>	<u>9</u>
<u>9.</u>	<u>Case Management Process</u>	<u>9</u>
	9.1 Reporting incidents internally	9
	9.2 Responding to incidents	10
<u>10.</u>	<u>Support</u>	<u>11</u>
	10.1 Support for students	11
	10.2 Support for staff	11
<u>11.</u>	<u>Anonymity</u>	<u>11</u>
<u>12.</u>	<u>Outcomes</u>	<u>11</u>
<u>13.</u>	<u>Confidentiality</u>	<u>12</u>
<u>14.</u>	<u>Related regulations, policies and procedures</u>	<u>12</u>
<u>15.</u>	<u>Review of Harassment and Sexual Misconduct Policy</u>	<u>12</u>

Document Version Control

Document Version	Committee	Committee Action	Date
	SMLT	Recommended for approval	6 July 2022
	Board of Directors	Approved	22 July 2022
		Date in force	26 July 2022

This Harassment and Sexual Misconduct Policy will be reviewed annually by our Senior Management and Leadership Team (SMLT). Any amendments require the approval of our Board of Directors.

1. Introduction

At Bloomsbury Institute we are committed to creating and sustaining a positive and mutually supportive environment where all staff and students feel safe, are equally valued and respected, and are encouraged to thrive. We are also equally committed to promoting and advancing equality, diversity and inclusion as key features within all our activities, as we believe this to be ethically right and socially responsible.

The equitable treatment of all is among our core values, underpinning our success as a community of scholars. For these reasons, we will not tolerate any form of harassment or sexual misconduct and will therefore treat any allegations of such incidents extremely seriously in line with both relevant legislation (including the Equality Act 2010) and our own internal policies and procedures.

This policy document (which has been developed in partnership with representatives from our student body) is designed to ensure an environment that promotes a culture of respect in which harassment and sexual misconduct are recognised as totally unacceptable behaviours. It also aims to reassure students and staff who are Reporting Parties (see **Section 3.5**) that allegations of harassment or sexual misconduct will be dealt with quickly and sensitively with no fear of victimisation. See **Section 3.4**.

2. Scope

This policy covers all Bloomsbury Institute staff and students (both current and prospective) and external consultants engaged in work commissioned by Bloomsbury Institute. It also covers:

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

3. Definitions

3.1 Harassment

Harassment is defined in the Equality Act 2010 as **unwanted** behaviour or conduct related to a protected characteristic¹ 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, you do 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 intimidation².

At Bloomsbury Institute we would extend the above definition of harassment 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 crime³ and these are:

¹ The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.

² This is covered in the Protection from Harassment Act 1997.

³ These strands are covered by legislation (sections 28-32 of the Crime and Disorder Act 1998 and sections 145 and 146 of the Criminal Justice Act 2003).

- 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 antisemitism⁴.

In some cases, behaviour which one individual may regard as acceptable may be regarded as unacceptable to another. However, the key point is that the actions or remarks are regarded as unacceptable by the recipient. It is therefore the effect on the individual that has to be taken into account and not the intention of the “harasser”. That said, the perception of the recipient does not automatically mean that the allegation of harassment will be upheld; instead those responsible for managing or investigating the complaint must make a judgement as to whether the behaviour being reported can *reasonably* be regarded as harassment.

3.2 Sexual harassment and sexual misconduct

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. It therefore 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 (as defined by the Sexual Offences Act 2003)
- Rape (as defined by the Sexual Offences Act 2003)
- 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 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

⁴ At Bloomsbury Institute we have adopted the [IHRA Working Definition of Antisemitism](#).

someone known and even trusted (like a friend, colleague, family member, partner or ex-partner), but it can also be perpetrated by a stranger.

3.3 Consent

Consent is the agreement to participate in a sexual act where the individual has both the freedom and capacity to make that decision.

- **Freedom to consent:** 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. 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.

Consent cannot be assumed on the basis of a previous sexual experience or previously given consent, and can be withdrawn at any time.

3.4 Victimisation

Victimisation involves treating someone less favourably than other people because that individual has:

- made a claim of harassment or bullying;
- suggested or complained that, in some other way, they have, or may have been, discriminated against, bullied or harassed or that the Institute's Equality, Diversity and Inclusion Policy or any other relevant policy has, or may have, been breached in some way;
- helped some other person who is making such a claim, perhaps by providing evidence or some other form of support to that other person.

At Bloomsbury Institute, we will not tolerate any form of victimisation against someone who has raised a complaint, or supported a genuine complaint, or cooperated in an investigation, or challenged unacceptable behaviour, or in each case is believed to have or is believed to be likely to take such steps.

If a formal complaint of victimisation is made about a student or staff member's behaviour it will be fully investigated and dealt with in accordance with the relevant student or staff disciplinary procedure.

3.5 Parties

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. Forms of harassment and sexual misconduct

Harassment can take a number of forms and can happen either on its own or alongside other forms of discrimination. Consequently, it does not necessarily have to be face-to-face. Harassment may take the form of images and graffiti, spoken or written words or abuse, physical gestures, facial expressions, sexist or racist "banter" and behaviour, jokes and telephone communications. Harassment may increasingly have an electronic dimension e.g. email or offensive tweets or comments on social media

(such as Facebook and Twitter). Cyber-bullying, sexual harassment, racial harassment, Islamophobia and Transphobia are all forms of harassment.

Sexual harassment, more specifically, can include sexual comments or jokes, physical behaviour; including unwelcome sexual advances, flirting, gesturing or making sexual remarks about someone's body, clothing or appearance, touching and various forms of sexual assault, asking someone about their sex life, displaying pictures, photos or drawings of a sexual nature or sending emails with a sexual content.

Harassment may be by an individual against an individual or involve groups of people where an individual might harass several colleagues. Similarly, a group of people may also be responsible for harassing an individual or group of individuals.

Some examples of unacceptable behaviour (including harassment and sexual misconduct) are included within **Appendix A**.

5. Our approach

At Bloomsbury Institute we work collectively to create an environment that respects the diversity of staff and students and enables them to attain their full potential to contribute fully, and to derive maximum benefit and enjoyment from their involvement in the life of our institution. To this end, we acknowledge being treated with dignity and respect as a basic right to be enjoyed by all members and prospective members of our community. We also recognise the duty of care we have to create and maintain an environment in which all feel safe.

We currently articulate our stance on harassment and sexual misconduct in a number of policies and other documents. Examples of these are listed below. In some cases, the statements we make are explicit and in others they are indirect in that they are understood within the terms of dignity and respect:

- Dignity and Respect Policy
- Equality, Diversity and Inclusion Policy
- Email Acceptable Use Policy
- Internet Acceptable Use Policy
- Safeguarding Policy
- Social Media Communications Policy
- Staff Disciplinary Procedure
- Staff Grievance Procedures
- Staff Relationships Policy
- Student Charter
- Student Complaints Policy and Procedures
- Student Disciplinary Policy and Procedures
- Student Handbook

Student representatives are members of **some** of the committees responsible for reviewing and approving the above policies. This is true in relation to the Dignity and Respect Policy, the Equality, Diversity and Inclusion Policy, Student Disciplinary Policy and Procedures and Student Complaints Policy and Procedures.

In addition, equality, diversity and inclusion considerations (including harassment and sexual misconduct) are covered at both staff and student inductions.

5.1 Our commitment

Equality, diversity and inclusion are values to which we are already strongly committed at Bloomsbury Institute. They underpin our Strategic Framework, our Access and Participation Plan, our Inclusive Learning Environment Framework, our regulatory framework (in the form of our [Equality, Diversity and Inclusion Policy](#), our [Dignity and Respect Policy](#)⁵ etc.) and are championed by our Head of Equality, Diversity and Inclusion and our Board of Directors through our Equality, Diversity and Inclusion Committee – the latter being a committee of the Board.

Our commitment to the above values is also evident in our compulsory staff training programme which includes the completion of online Equality and Diversity, Bullying and Harassment and Unconscious Bias courses by all staff within 1 month of joining Bloomsbury Institute and every year thereafter. In addition, all staff are required to read (and re-read on an annual basis) our Unconscious Bias Guidance Notes as it is one of our core company documents.

5.2 Governance and accountability

Our Board of Directors is responsible for actively promoting and applying equality, diversity and inclusion throughout Bloomsbury Institute, and also promoting an inclusive teaching and learning environment. This responsibility is clearly articulated within our [Articles of Association](#) and our [Corporate and Academic Governance Framework](#)⁶. Consequently, our Board of Directors 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 [Statement of Expectations](#) and the Committee of University Chairs' [Practice Note](#).⁷

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 latter has a number of responsibilities including:

- determining the company's strategic direction in relation to equality, diversity and inclusion, and ensuring this is articulated within the company's Equality, Diversity and Inclusion Policy, and reflected within all other policies and procedures.
- actively promoting, applying, and ensuring compliance with the company's Equality, Diversity and Inclusion Policy, and ensuring the Policy is reviewed annually.

To further embed equality, diversity and inclusion considerations within our governance structures and ensure ongoing compliance, we have undertaken a number of measures including the following:

- We have included within the membership of our Equality, Diversity and Inclusion Committee, one of our Executive Directors, the President of our Student Guild, and a number of members of our Senior Management and Leadership Team (including our designated Safeguarding Officer⁸) who also sit on a number of other key committees.
- Both Directors and Non-Executive Directors on the Board are required to complete compulsory training on an annual basis under the equality, diversity and inclusion

⁵ Both policies can be accessed from <https://www.bil.ac.uk/qem/policies/>

⁶ Both documents can be accessed from <https://www.bil.ac.uk/qem/section-1/>

⁷ <https://www.universitychairs.ac.uk/wp-content/files/2022/05/CUC-Tackling-Harassment-Publication-May-2022-FINAL-1.pdf>

⁸ The Director of our Centre for Student Engagement, Wellbeing and Success is our designated Safeguarding Officer.

umbrella, namely courses on Equality and Diversity, and Unconscious Bias. This is also a requirement for staff representatives at the Board. In addition, the Executive Directors and staff representatives are required to complete training on Bullying and Harassment each year.

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 Directors, the Senior Management and Leadership Team, the Academic Committee and the Quality Assurance and Enhancement Committee for consideration and action.
- Monthly EDI update reports and an Annual Equality, Diversity and Inclusion Report are submitted to the Board of Directors, the Senior Management and Leadership Team, and Academic Committee for consideration and action. The update reports and the Annual Equality, Diversity and Inclusion Report (which is approved by the Equality, Diversity and Inclusion Committee) 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.
- This Harassment and Sexual Misconduct Policy requires the approval of the Board of Directors upon recommended approval by the Senior Management and Leadership Team.
- The Equality, Diversity and Inclusion Committee is chaired by our Head of Equality, Diversity and Inclusion who reports directly to the Managing Director and Academic Principal. The Head of Equality, Diversity and Inclusion also holds the role of Company Secretary and so is always available at meetings of the Board of Directors to answer directly and immediately any questions that members of the Board might have.
- An annual report to the Board of Directors on incidents of harassment or sexual misconduct that would include the number and type of incidents, responses and outcomes. In the event of there being no known incidents, the report would confirm that that was the case.

6. Training

In addition to the compulsory training for all staff detailed in section 5.1, training will be provided on the basis of a needs assessment according to responsibilities set out within this policy document. General training needs will focus on awareness raising designed to prevent incidents of harassment and sexual misconduct and encourage disclosure where such incidents might occur. Beyond that, more specialist training will be offered to designated staff on how to receive and handle disclosures of harassment and sexual misconduct effectively, particularly where the incident might result in criminal proceedings. More specialist training will also be provided to those involved in providing support to all parties involved.

6.1 All staff

In order to raise awareness of, and prevent, harassment and sexual misconduct, all members of staff are currently required to complete compulsory training as set out in Section 5.1 above. The People, Culture and Talent Manager is responsible for monitoring completion of the training and issuing reminders where necessary.

To complement the above training, there are a number of core company documents that all staff are required to read. These include our [Equality, Diversity and Inclusion Policy](#), [Dignity and Respect Policy](#),

[Safeguarding Policy](#), and our [Unconscious Bias Guidance Notes](#)⁹. Our HR Online system provides a mechanism for monitoring staff who have read/have yet to read all our core compulsory company documents.

6.2 All students

Equality, diversity and inclusion are areas that we cover with students at Induction along with an introduction to our online [Quality and Enhancement Manual](#) (QEM) where students can access our policy documents. We also cover behavioural expectations in terms of respect for one another within our [Student Charter](#) and our [Student Handbook](#) in the context of behavioural expectations, particularly in relation to respect. Our induction events provide new students with the opportunity to learn more about our institutional values, which include inclusivity and treating people well, and the areas of the Student Charter relating to respect and building an inclusive community are examined in more depth in interactive group discussions.

Equality, diversity and inclusion is also embedded within the curriculum for students on our 4-Year Foundation degrees in that they cover and are assessed on the Equality Act 2010, and bullying and harassment in their compulsory Contemporary World module in Term 1 of their Foundation Year. We also encourage students on our Business Management Top-up course to complete the ACAS online training courses on Equality and Diversity, and Bullying and Harassment for personal development and employability reasons.

7. Awareness

We have created a [Guidance and Resources](#) webpage and a [Self-help and Online Resources](#) page for both students and staff which provide information on external sources of support and reporting mechanisms available in relation to a range of matters including harassment, sexual harassment, hate crime. See **Appendix B** for details of entries relevant to harassment, hate crime and sexual misconduct. This complements our formal training. We also mark relevant events throughout the year e.g. International Day for the Elimination of Violence against Women.

8. Responsibilities

Every member of our academic community including visitors to our Institute has a right to be treated with dignity and respect. However, with that right comes the following responsibilities which apply to all members and prospective members of our academic community (again including visitors):

- To treat others with dignity and respect.
- To challenge inappropriate behaviours in others.

Similarly, all members of our academic community including visitors, have a responsibility to report a suspected disciplinary offence.

9. Case Management Process

9.1 Reporting incidents internally

All students and staff members are encouraged to raise any concerns that they may have or incidents they have experienced or witnessed with whoever they feel most comfortable doing so. However, students would be encouraged to approach a member of staff with our Centre for Student Engagement, Wellbeing and Success (SEWS) or the Student Guild, whilst staff would be encouraged to approach

⁹ The first three policies listed can be accessed from <https://www.bil.ac.uk/gem/policies/> whilst the last two are available to staff on HR Online from https://login.breathehr.com/login?identifier=lsbm&redirect_app=hr

either their Line Manager, our [People, Talent and Culture Manager](#)¹⁰ or our [Head of Equality, Diversity and Inclusion](#).¹¹

Nature of the complaint	Relevant Policy	Comment
Student complaint about a student	Student Complaints Policy and Procedures	Such complaints may be referred to the Student Disciplinary Policy and Procedures at the discretion of Bloomsbury Institute.
Student complaint about a staff member	Staff Disciplinary Procedure	
Staff member complaint about a staff member	Staff Grievance Procedures	Following an investigation, a grievance may be referred to the Staff Disciplinary Procedure.
Staff members complaint about a student	Harassment and Sexual Misconduct Policy	

Both the [Student Complaints Policy and Procedures](#) and [Student Disciplinary Policy and Procedures](#)¹² include a user-friendly flowchart of the procedures involved. However, if students need any support understanding the procedures, they can contact a member of staff within our Quality team.¹³

9.2 Responding to incidents

We take all reports of harassment and sexual misconduct extremely seriously. We are therefore committed to responding quickly and sensitively to resolve any issues or allegations as we recognise our duty of care to all within our academic community. This includes not only the Reporting Party and the Reported Party, but also the wider community which may be affected by the situation.

In circumstances where the allegation of harassment or sexual misconduct may constitute a criminal offence, the matter should be reported immediately to the Managing Director and Academic Principal, and the Academic Registrar.

We will not routinely report the matter to the Police as we will be guided here by the wishes of the Reporting Party. The only exception would be where we consider there to be a safeguarding concern for either the Reporting Party or others or to prevent a further crime being committed. This assessment will be undertaken on a case-by-case basis.

In the event of us deciding that it is necessary for us to report the alleged crime to the Police, we will notify the Reporting Party to explain the reasons for our decision. This will also ensure that the Reporting Party is prepared for any possible approach from the Police.

Where appropriate, we will make every effort to achieve an informal resolution to any concern raised or incident reported. However, where this is not appropriate, where the reporting party does not wish to take an informal approach or where informal resolution proves unsuccessful, we will apply the procedures set out within our relevant complaints and disciplinary policies and procedures. The latter cover the investigatory process, decision-making process and associated timescales as well as the right to appeal.

Fundamental to our policies and procedures in the area of harassment and sexual misconduct is recognition of the need for an investigatory process that is demonstrably transparent, independent, and free from any reasonable perception of bias.

¹⁰ The People, Culture and Talent Manager can be contacted via email at Antony.charles@bil.ac.uk

¹¹ The Head of Equality, Diversity and Inclusion can be contacted via email at Maria.jackson@bil.ac.uk

¹² Both documents are available from www.bil.ac.uk/qem/policies

¹³ The Quality team can be contacted via email at quality@bil.ac.uk

10. 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 Bloomsbury Institute is provided below in **Sections 10.1 and 10.2** 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 [Disability Office](#)¹⁴ are available to provide mental health and wellbeing support. Our Disability and Wellbeing Manager is a First Aid Mental Health Champion.

10.1 Support for students

Support and advice for students is available from staff within our [Centre for Student Engagement, Wellbeing and Success](#)¹⁵ (SEWS), the Student President, and the Student Guild. Depending on the nature and severity of the incident, additional support may be available of a more practical nature through our Registry Division (e.g. extension requests and mitigating circumstances) and Estates and Facilities Department.

10.2 Support for staff

Staff can speak in confidence to their Line Manager, our People, Talent and Culture Manager or the Head of Equality, Diversity and Inclusion for initial advice and support on options. See **Section 9.1** above for contact details.

Support for staff is also available from Care First's Employee Support Hub. The Hub is staffed by a team of qualified therapists who are on hand to offer support with a range of emotional, legal, and financial issues. Care-First are open 24 hours a day, 7 days a week, 365 days a year for free confidential counselling and support. Information on Care First's Employee Support Hub can be found in the Staff Benefits document available from HR Online.

11. Anonymity

We are not able to consider anonymous complaints as complaints require a full investigation to enable resolution and this is not possible with an anonymous complaint. In addition, there would be problems communicating the outcome of an anonymous complaint. We will do our utmost to create an environment where people feel it is safe to make a complaint.

12. 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, or an explanation of any actions we have taken, or not taken, as a result of learning from the Reporting Party. However, it may not be appropriate for us to share specific details affecting the other student or staff member, particularly where disciplinary action is being taken. Should the outcome of a process change, we would inform both parties accordingly.

¹⁴ Staff within the Disability Office can be contacted at disability@bil.ac.uk

¹⁵ Staff within the Centre for Student Engagement, Wellbeing and Success can be contacted at sews@bil.ac.uk

13. Confidentiality

We will deal with complaints on a confidential basis in line with relevant legislation and internal policies (e.g. our [Data Protection Policy](#) and our [Confidentiality Policy](#)¹⁶), 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.

14. Related regulations, policies and procedures

- Data Protection Policy
- Dignity and Respect Policy
- Equality, Diversity and Inclusion Policy
- Email Acceptable Use Policy
- Internet Acceptable Use Policy
- Safeguarding Policy
- Staff Disciplinary Procedure
- Staff Grievance Procedure
- Staff Relationships Policy
- Student Complaints Policy and Procedures
- Student Disciplinary Policy and Procedures

15. Review of Harassment and Sexual Misconduct Policy

This Harassment and Sexual Misconduct Policy will be reviewed annually by our Senior Management and Leadership Team (SMLT). Any amendments require the approval of our Board of Directors.

¹⁶ Both policy documents can be accessed from <https://www.bil.ac.uk/qem/policies/>

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:

- 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

Reporting incidents externally

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

For non-emergency enquiries, you can call 101.

Hate Crime		
All 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.
All hate crime	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.
Antisemitic hate crime	Community Security Trust 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.
Anti-Muslim hate crime	Tell Mama 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.
Anti-LGBTQ+ hate crime	GALOP http://www.galop.org.uk/ National LGBTQ+ Domestic Abuse Helpline: 0800 999 5428 LGBTQ+ Hate Crime Helpline:	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.

	020 7704 2040	
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.