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1. Policy Statement

1.1. SIRM's policy to prevent and deal with harassment and sexual misconduct is part of the institutional strategy for promoting equality and valuing diversity and for protecting and enhancing the wellbeing of all employees and students. This policy should be read in conjunction with SIRM's Equality and Diversity Policy and other relevant policies.

1.2. SIRM is committed to providing an environment for all its staff and students that is comfortable and free from all forms of harassment and behaviour related to sexual misconduct. SIRM adopts a zero-tolerance approach towards and any employee or student who is found to have behaved in this way against a member of SIRMs community will be subject to disciplinary action.

1.3. Employees and students are encouraged to report any incidents of harassment and sexual misconduct that they experience or witness so that SIRM can investigate the matter. Such complaints will be taken seriously and anybody who makes a genuine complaint of harassment/misconduct will not be penalised or victimised in any way.

1.4. Vexatious or frivolous use of this policy may result in disciplinary action being taken against the complainant. A vexatious complaint is one which is raised maliciously or in bad faith.

1.5. SIRM will provide advice and support for anyone who experiences instances of harassment or sexual misconduct and encourages those individuals to seek advice and, as appropriate, to take informal and formal action.

2. Purpose and Scope

2.1. In line with the Office for Students' (OfS) **Condition E6**, this policy covers all forms of unlawful harassment under the Equality Act 2010, including but not limited to sexual misconduct, racial discrimination, disability harassment and other conduct related to protected characteristics. SIRM adopts a zero-tolerance approach to such behaviour.

2.2. It applies to:

- All students enrolled at SIRM including those studying via partnerships and franchises, whether on campus or through blended learning

- All staff, members of the Advisory Board, contractors, and third parties engaging with students and to the students themselves
- All activities conducted on or off campus, including placements and field trips/visits.

2.3. This policy has two purposes:

- To assist in developing an institutional ethos in which sexual misconduct and harassment are unacceptable, and to empower individuals to deal with any incidents that occur;
- To provide a process whereby complaints relating to sexual misconduct and harassment may be resolved by means of informal and/or formal action.

2.4. This policy takes precedence over all other institutional policies (including the Bullying and Harassment Policy and Complaints Procedure) in matters related to:

- Sexual misconduct (e.g., assault, harassment, stalking)
- Harassment linked to a protected characteristic under the Equality Act 2010
- Staff-student relationships.

2.5. Where overlap exists with other policies, the procedures and definitions in this policy shall govern.

2.6. For matters exclusively involving non-sexual bullying (e.g. repeated workplace intimidation unrelated to a protected characteristic) consult the Bullying and Harassment Policy.

3. Definitions

For the purposes of this policy:

3.1. **Harassment:** constitutes unwanted conduct related to a protected characteristic (as defined by the Equality Act 2010, Section 26) or a course of conduct causing distress (Protection from Harassment Act 1997, Section 1). This includes, but is not limited to:

- Racist, sexist, or homophobic language.

- Bullying based on disability, religion, or gender identity
- Persistent unwanted communication (e.g., stalking, threatening messages).

3.2. A single severe incident may constitute harassment if it violates dignity or creates a hostile environment.

3.3. **Sexual Misconduct:** includes any unwanted conduct of a sexual nature, whether or not it relates to a protected characteristic. This encompasses:

- Unwanted sexual attention, remarks, or behaviour that creates an intimidating or degrading environment (as prohibited under the Equality Act 2010, Section 26).

3.4. Criminal Sexual Offences: Acts criminalised under the Sexual Offences Act 2003, such as:

- Non-consensual sexual activity (rape, assault)
- Coercion or blackmail for sexual favours.

3.5. Exploitative Conduct: Abuse of power for sexual purposes, including:

- Staff soliciting relationships with students they supervise
- Non-consensual sharing of intimate images ('revenge porn').

3.6. Digital/Stalking Behaviours: Unwanted sexual contact online (e.g., cyberflashing) or in-person stalking (Protection from Freedoms Act 2012).

3.7. Some incidents of sexual harassment and misconduct may also constitute a criminal offence under English law. Such incidents may be addressed through criminal proceedings, internal disciplinary meetings, or in some cases, both criminal and internal proceedings.

4. Institutional Commitment

4.1. SIRM is committed to providing a safe, transparent and accountable environment for all students, staff and visitors. All members of our community are expected to maintain professional boundaries and respect the dignity and autonomy of others in all interactions.

4.2. SIRM is committed to:

- Taking significant and credible action to prevent all forms of harassment and sexual misconduct.
- Providing clear, accessible information on how students and staff can report concerns.
- Offering appropriate support to those affected, whether complainants, witnesses, or respondents.
- Handling all reports fairly, promptly, and sensitively, ensuring procedural fairness.
- Banning the use of non-disclosure agreements (NDAs) to silence students and staff in harassment or sexual misconduct cases.
- Upholding freedom of speech and academic freedom, ensuring that measures to prevent harassment do not unduly restrict lawful debate or teaching.
- Maintaining a website accessible without login containing the Single Comprehensive Source of Information (SCSI) for harassment and sexual misconduct that serves as the centralised, authoritative resource for all policies, procedures and support information in full compliance with Office for Students (OfS) Condition E6 and relevant UK legislation. The current version of the SCSI is available at: https://www.sirm.ac.uk/scsi/

5. Governance and Accountability

5.1. SIRMs Advisory Board has ultimate responsibility for and oversight of the approach to tackling harassment and sexual misconduct. An annual report on these areas is considered by the Advisory Board.

6. Preventive measures

6.1. SIRM has implemented the following significant and credible steps to reduce the risk of harassment and sexual misconduct, informed by sector best practices and designed to create a culture of accountability and support:

- **Mandatory Training:** All students and staff receive evidence-based training on harassment prevention, consent, bystander intervention, and reporting procedures, with content reviewed annually to reflect evolving best practices.

- **Awareness Campaigns:** Regular campaigns promote respect, inclusivity, and safe campus environments, with input from student and staff representatives to ensure relevance.

- **Anonymous Reporting Tools:** A secure, accessible platform for anonymous disclosures, enabling SIRM to monitor trends and respond with targeted interventions.

- **Partnerships with Specialist Services:** Collaboration with external organisations (e.g., Sexual Assault Referral Centres) to provide independent support and expertise.

- **Annual Review:** SIRM will evaluate the effectiveness of these measures through anonymised data analysis, stakeholder feedback (e.g., student surveys), and benchmarking against sector standards. Findings will inform annual updates to this policy and related actions.

6.2. The effectiveness of these measures is monitored through annual analysis, stakeholder feedback and policy reviews as detailed in Section 14 (Monitoring and Continuous Improvement).

7. Reporting Procedures

7.1. **How to Report:** Students, staff, and third parties can report harassment or sexual misconduct through the following channels:

- Online reporting platform: Report and Support
- Email to studentsupport@sirm.ac.uk
- In-person to Student Support.

7.2. Reports can be made both anonymously and through disclosing identity of the complainant and by either the individual affected or a third party:

7.3. **Handling Reports:** We will respond promptly and effectively to all reports of sexual harassment and violence. We commit to every disclosure being:

- Taken seriously and treated with sensitivity
- Handled by appropriately trained staff members
- Processed through clear, transparent procedures
- Communicated clearly to all involved parties.

7.4. We respect the autonomy of individuals making disclosures by:

- Providing options for informal resolution or formal investigation
- Supporting their right to involve external authorities if desired
- Offering ongoing support regardless of the chosen path forward.

7.5. We balance these principles by:

- Respecting privacy while maintaining necessary transparency
- Being clear about information-sharing limitations
- Ensuring all parties understand each stage of the process.

7.6. This policy reflects our institutional commitment to creating a safe environment where all community members feel supported in coming forward with concerns about sexual misconduct.

7.7. Formal complaints submitted via the complaints procedure that fall under this policy's scope will be redirected to Harassment and Sexual Misconduct processes.

8. Timescales

8.1. SIRM normally expects allegations of sexual misconduct, bullying, harassment and/or discrimination to be disclosed within 3 months of the incident taking place to allow for the most effective investigation to take place.

8.2. However, SIRM recognises that there may be circumstances where it may take longer for a student to disclose an incident. Where a disclosure is received more than 3 months from the date the incident is alleged to have taken place,

the disclosure will be taken seriously and where possible, reasonable attempts will be made to obtain relevant information to determine the appropriate response.

8.3. Where disclosures are made which fall within the scope of this policy, they will be dealt with in a timely manner. Where it may be necessary for matters to be referred to SIRM's Student Disciplinary Procedure, the timescales set out therein will apply as far as it is reasonable and possible to do so.

9. Support Services

9.1. At SIRM we provide tailored support to:

- Students who report harassment or sexual misconduct
- Students accused of harassment or sexual misconduct
- Witnesses or others affected.

9.2. **Types of Support**

- Referral to counselling and wellbeing services
- Academic adjustments if needed (e.g., deadline extensions)
- Assistance in reporting to the police or accessing external specialist services
- Named support contacts for case management
- Support is available regardless of whether a formal complaint is made.

10. Training and awareness:

10.1. SIRM is committed to fostering a safe, inclusive, and respectful environment for all members of our community. To uphold this commitment, we mandate comprehensive training on bullying, harassment, and appropriate conduct for all students and staff.

10.2. This training ensures everyone understands their responsibilities, recognizes unacceptable behaviour, and knows how to respond effectively.

10.3. The program includes:

- Mandatory participation for students (during induction and refresher sessions) and all staff, with specialised training for those in key roles.
- Evidence-based content covering identification of misconduct, intersectional approaches, reporting procedures, bystander intervention, and balancing freedom of speech with inclusivity.
- Regular reviews to maintain relevance and effectiveness.

10.4. Through this training, we empower our community to contribute to a culture of dignity and accountability.

11. Staff-student relationships

11.1. SIRM maintains strict professional boundaries between staff and students to prevent abuses of power and protect the integrity of our academic environment. This section outlines:

11.2. **Prohibited Relationships:**
Staff are prohibited from entering romantic or sexual relationships with any student over whom they have academic, professional, or pastoral responsibility. Where a staff-student relationship existed before the student joined SIRM, this may be viewed as an 'Excluded Relationship' but should still be notified to Human Resources and to the Principal.

11.3. **Disclosure Requirements**
Any developing intimate personal relationships between staff and students must be formally disclosed to the Human Resources Director and/or the Principal. Failure to disclose or any breach of this policy may result in disciplinary action. Further guidance is available in the Staff Code of Conduct.

11.4. **Non-Disclosure Agreements (NDAs)**
SIRM prohibits the use of non-disclosure agreements (NDAs) or any other restrictive clauses in contracts or settlement agreements that prevent students or staff from disclosing allegations of harassment or sexual misconduct. This applies to both formal complaints and informal disclosures.

12. Freedom of Speech and Academic Freedom

12.1. This policy is implemented consistently with SIRM's obligations to uphold freedom of speech and academic freedom. Exposure to lawful academic content, discussion of controversial ideas, or participation in open debate, even if upsetting to some, does not constitute harassment unless they:

- Target individuals/groups and
- Objectively violate dignity or create a hostile environment

12.2. Concerns about academic content will be assessed against these principles.

13. Data Collection and Reporting

13.1. SIRM will maintain annual statistics on disclosed incidents of sexual misconduct, bullying, harassment and/or discrimination for the purposes of education, training and any reporting (internal and external) or publication that may be required, including reporting to the Senior Leadership Team and Advisory Board.

13.2. Confidentiality: The statistics will not include any identifying information.

14. Monitoring and Continuous Improvement

14.1. To maintain robust safeguards against harassment and sexual misconduct, SIRM will implement a cyclical review process comprising data analysis, policy evaluation, and transparent reporting to drive continuous improvement:

14.2. We commit to:

- Monitor reports and case outcomes
- Evaluate the effectiveness of this policy through feedback, surveys, and data analysis – findings from annual monitoring will directly inform updates to training, campaigns and support services
- Review and update this policy annually
- Report on compliance with Condition E6 to the Advisory Board

- Publish an updated version of this Comprehensive Source of Information each year – past versions will also be retained on the SCSI webpage with version dates (https://www.sirm.ac.uk/scsi/)

15. Quick reporting guide (Report + Support)

Type of report	***How to report***	***Support available***
Named Report	Online platform, email, or in-person	Case manager assigned, full investigation, academic and wellbeing support
Anonymous. Report	Online platform	Monitored trends, limited action possible, support signposting