

Student Harassment and Sexual Misconduct Policy

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Summary/description: This document details the clearly formulated and impartial process for dealing with allegations relating to harassment, bullying, hate incidents/hate crimes, discrimination and sexual misconduct and providing support to those affected. The policy has been revised to reflect the Office for Students' registration condition (E6) on harassment and sexual misconduct (effective 1 August 2025).

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GENERAL

1. Purpose of this policy

- 1.1. To outline the University's commitment to responding to incidents of sexual misconduct, harassment, hate incidents/hate crimes, bullying and discrimination within our community.
- 1.2. To raise awareness of sexual misconduct, harassment, hate incidents/hate crimes, bullying and discrimination in order to promote a fully inclusive culture to enable issues to be tackled appropriately if they occur.
- 1.3. To support the University's compliance with the requirements of the <u>Office for Students</u> (OfS) relating to harassment and sexual misconduct (OfS registration condition E6).
- 1.4. To improve understanding across our community and to provide a supportive culture which encourages disclosure of incidents. This policy aims to ensure that all parties are treated with dignity and respect and provided with access to support. Students' attention should be drawn to Appendix 1 of this policy which sets out guidance and internal and external support services which may be of assistance.
- 1.5. The University will take appropriate steps to deal with behaviour that results in a breach of this policy.
- 1.6. This policy will be reviewed on an annual basis.

2. Policy scope

- 2.1. The policy applies to behaviour and conduct by registered students wherever and whenever it may have taken place when it is considered by the University to be detrimental to:
 - 2.1.1. any other member of the University community; and/or
 - 2.1.2. university property; and/or
 - 2.1.3. the interests and reputation of the University itself.
- 2.2. This includes behaviour arising at any time when the student may be regarded as representing the University as an individual or as part of a team or group and when the student is at a location away from the University e.g. as part of their study or following an arrangement made through the University.
- 2.3. The policy applies equally to students from partner institutions whilst on university premises. The University also appreciates and recognises that any student studying at a partner institution may make disclosures to the University which fall within the scope of this policy. Where this happens, the University and the partner institution will together consider carefully how best to respond to the disclosure to ensure appropriate support and investigative processes are put in place as necessary.
- 2.4. The policy does not preclude individuals from seeking recourse through criminal or civil proceedings. Any judgements reached as part of an investigation into matters covered by this

- policy do not constitute a legal ruling on whether criminal activity has taken place, which can only be made by the courts.
- 2.5. The policy applies equally to all students regardless of any protected characteristics.
- 2.6. It should be noted that incidents of harassment, bullying, discrimination, hate incidents/hate crimes and sexual misconduct are not limited to incidents taking place in person. The policy includes incidents taking place through any medium, including online, by email and/or any form of social media. Use of University systems in this way will contravene the University's Policy for Acceptable Use of Email, Internet and Cloud Facilities. Students' attention is also drawn to the University's Student Social Media Policy and Guidelines.
- 2.7. Whilst this policy does not apply specifically to staff, the University wishes to make clear that it does not tolerate any cases of staff being bullied, harassed, discriminated against or subjected to any form of sexual misconduct or hate incidents/hate crimes. Staff are referred to the <u>Staff Bullying and Harassment Policy</u> for further information and should contact their faculty or directorate or <u>Report + Support</u> if they wish to make a disclosure or need assistance. In particular, staff are reminded of the need to maintain appropriate professional relationships with students as set out in the <u>Personal Relationships Policy</u>. This bans personal relationships between staff and students, except for pre-existing relationships which must be declared and any conflict of interest managed.
- 2.8. Where a student is also an employee of the University, this policy will apply to any allegations against them which relate to their status as a student. Allegations relating to their employment will be dealt with under the appropriate People Directorate procedure.
- 2.9. The University expects its partner institutions and placement providers to have appropriate processes in place for dealing with any disclosure of harassment, bullying, hate incidents/hate crimes, discrimination and/or sexual misconduct, which should be consistent with this policy. Any student making a disclosure or against whom a disclosure is made will be supported appropriately by both the partner institution and the University as required.

3. Timescales

- 3.1. The University normally expects allegations of sexual misconduct, bullying, hate incidents/hate crimes, 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. However, the University 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, where information is still held.
- 3.2. 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 the University's Student Disciplinary Procedure, the timescales set out therein will apply as far as it is reasonable and possible to do so.

4. Definitions

- 4.1. **"Bullying"** may be characterised as offensive, intimidating, persistent malicious or insulting behaviour, including an abuse of power to undermine, humiliate or injure the recipient. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.
- 4.2. **"Discrimination"** occurs when a person is treated less favourably for a reason related to a protected characteristic.
- 4.3. **"Harassment"** has the meaning given in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997 (interpreted in accordance with section 7 of that Act):
 - For the purposes of the Equality Act, harassment is unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. This includes harassment by association or perception. Under the Equality Act, the relevant protected characteristics are age, disability, gender reassignment, race, religion or belief, sex and sexual orientation.
 - For the purposes of the Protection from Harassment Act, harassment is a course of conduct conducted on at least two occasions that harasses one other person, or a course of conduct that harasses two or more persons at least once each. References to harassing a person include alarming the person or causing the person distress.

The definitions of 'harassment' in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997 include 'objective' and 'reasonableness' tests:

- In the context of section 26 of the Equality Act 2010, in deciding whether conduct has
 the effect of violating a person's dignity, or creating an intimidating, hostile, degrading,
 humiliating or offensive environment towards that person, it is necessary to take into
 account: the perception of the person who is at the receiving end of the conduct; the
 other circumstances of the case; and whether it is reasonable for the conduct to have
 that effect.
- In the context of section 1 of the Protection from Harassment Act 1997, harassment is committed only if the person knows the conduct amounts to harassment of the other, or a reasonable person in possession of the same information would think the course of conduct amounted to harassment of the other person.
- 4.4. "Hate incidents/hate crimes" refers to acts of violence or hostility directed at people because of who they are or who someone thinks they are. Hate incidents/crimes are motivated by hostility or prejudice based on disability, race, religion, sexual orientation, and/or transgender identity. They can be an incident against a person or against property, and include materials posted online.
- 4.5. **"Sexual Misconduct"** relates to any unwanted or attempted unwanted conduct of a sexual nature. This includes, but is not limited to:
 - 4.5.1. Sexual harassment as defined by Section 26(2) Equality Act 2010.

- 4.5.2. Assault as defined by the Sexual Offences Act 2003, including sexual assault and assault by penetration.
- 4.5.3. Rape as defined by the Sexual Offences Act 2003.
- 4.5.4. Less favourable treatment for rejecting or submitting to unwanted conduct of a sexual nature as defined by Section 26(3) of the Equality Act 2010.
- 4.5.5. Sharing or threatening to share intimate photographs or films of an individual without their consent as defined by the Sexual Offences Act 2003 (as amended by the Online Safety Act 2023).
- 4.5.6. Domestic violence and abuse (an incident or pattern of incidents of controlling, coercive, threatening, degrading and/or violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but could also be by a family member or carer).
- 4.6. **"Victimisation"** occurs when a person is treated less favourably because they have asserted their rights to raise a complaint under this policy. This also applies to those who have acted as witnesses or supporters of individuals who have complained of harassment, bullying, hate incidents/hate crimes and/or sexual misconduct.

5. Relationship with other policies

- 5.1. The policy should be read in conjunction with the <u>Student Disciplinary Procedure</u> which will be applied where it is necessary for allegations of harassment, bullying, discrimination, hate incidents/hate crimes, and/or sexual misconduct against students to be investigated by the University.
- 5.2. Where a disclosure is made that falls within the scope of this policy and concerns an allegation against a student, consideration will be given as to whether it may be possible for the matter to be resolved informally at local level at Stage 0 of the Student Disciplinary Procedure.
- 5.3. If informal resolution is not possible or the disclosure is deemed to be sufficiently serious, a formal investigation may be commenced under the Student Disciplinary Procedure or referred to the Staff Disciplinary Policy and Procedure if the allegation relates to a staff member.
- 5.4. If a student makes a disclosure falling within the scope of this policy during the formal stages of a Fitness to Study or Fitness to Practice hearing, those proceedings may be suspended in order to consider the disclosure. Where the concerns are related, it will normally be appropriate to deal with the issues concurrently. Each case will be considered on an individual basis, considering the need to provide a fair process without unduly delaying or duplicating formal process.
- 5.5. Appropriate reasonable adjustments will be made to any University procedure to enable disabled students to engage and participate fully without disadvantage. Where necessary, appropriate advice will be sought from the University's Student Wellbeing Service as to what adjustments it may be reasonable to implement in the circumstances.
- 5.6. Students should be aware that making a malicious or vexatious allegation under this policy may be treated as a disciplinary matter under the Student Disciplinary Procedure.

5.7. The University has signed the Can't Buy My Silence's <u>Universities Pledge</u>, which means that the University will not use non-disclosure agreements (NDAs) in relation to complaints of sexual harassment, abuse, misconduct, or other forms of harassment and bullying. In addition, since September 2024 the Office for Students has prohibited universities from using NDAs in relation to student allegations of harassment and sexual misconduct. More generally, the University does not and will not use NDAs or clauses which compromise a person's right to make public interest disclosures either to the University or directly to the <u>prescribed third parties</u> nominated by government on matters falling within the scope of this policy.

6. Confidentiality and data protection

- 6.1. Ensuring confidentiality is a key principle in creating a culture where those affected feel safe to make a disclosure.
- 6.2. The University will take all reasonable steps to protect the confidentiality and privacy of those who make a disclosure falling within the scope of this policy, in accordance with the Student Confidentiality Policy. However, there may be circumstances where the University is required to share information internally or with other agencies in order to protect an individual at risk.
- 6.3. The University may be required to break confidentiality and share information internally or with external agencies if:
 - 6.3.1. the person is a child or young person under 18 who has experienced, or is at risk of, significant harm; or
 - 6.3.2. information is provided about a child or young person under 18 who has experienced, or is at risk of, significant harm; or
 - 6.3.3. that person is an adult at risk as set out in the University's <u>Safeguarding Policy</u> who has experienced, or is at risk of, significant harm; or
 - 6.3.4. information is provided about a person who may be an adult at risk who has experienced, or is at risk of, significant harm; or
 - 6.3.5. it is believed that there is a risk of significant harm occurring to any individual; or
 - 6.3.6. it is believed that there is a risk to the public or students or staff; or
 - 6.3.7. the disclosure is otherwise required by law or in accordance with the University's duties and obligations under data protection law.
- 6.4. There may also be circumstances where the University needs to share certain information internally in accordance with its <u>Data Protection Policy</u>. This could include (but is not limited to):
 - 6.4.1. preventing or detecting criminal behaviour or misconduct;
 - 6.4.2. ensuring appropriate information about support services is passed on;
 - 6.4.3. data collection;
 - 6.4.4. managing conflicts of interest;

- 6.4.5. seeking advice from other University departments;
- 6.4.6. protecting others.
- 6.5. In the case of learners enrolled on apprenticeship programmes, the University acknowledges its duty to keep the apprentice's employer informed of any matters that may impact the apprentice's professional conduct, well-being or ability to continue their employment or training. Where an allegation or breach of this policy involves an apprentice, and it is deemed appropriate or necessary in line with safeguarding, legal obligations, or the terms of the apprenticeship agreement, the University may share relevant information with the apprentice's employer. Any such communication will be managed sensitively, and the apprentice will normally be informed unless doing so poses a risk of harm or is otherwise inappropriate.
- 6.6. Records of any disclosures made under this policy and any subsequent investigation and/or action will be held in accordance with the University's duties and obligations under data protection law.

7. Governance

- 7.1. The University's Governing Body has ultimate responsibility for and oversight of the University's approach to tackling sexual misconduct, bullying, harassment, hate incidents/hate crimes and discrimination. An annual report on student casework in these and other areas is considered by the Governing Body following consideration by the Academic Council.
- 7.2. Operational responsibility for ensuring a University-wide response is delegated to the executive (the Vice-Chancellor's Executive). The University has created a Safeguarding and Compliance Committee, reporting to the Health, Safety, Safeguarding and Wellbeing Board, with representation from across the University including Student and Academic Services, People Directorate, the faculties and the Students' Union. The Safeguarding and Compliance Committee has responsibility for co-ordinating and implementing the University's approach to tackling student sexual misconduct, bullying, harassment, hate incidents/hate crimes and discrimination.
- 7.3. Amendments to this policy will be submitted to the Academic Council's Student Success Board for approval having been considered by the Safeguarding and Compliance Committee and other relevant committees.

8. Data collection

- 8.1. The University will maintain annual statistics on disclosed incidents of sexual misconduct, bullying, harassment, hate incidents/hate crimes and discrimination for the purposes of education, training and any reporting (internal and external) or publication that may be required, including reporting to the Academic Council and Governing Body.
- 8.2. The statistics will not include any identifying information.

9. Freedom of speech

- 9.1. In any matter falling under this policy, the University will have particular regard to, and place significant weight on, the importance of freedom of speech within the law, academic freedom and tolerance for controversial views in an educational context or environment. The University's commitments to freedom of speech and academic freedom are set out in the Freedom of Speech Code of Practice.
- 9.2. In particular, the University will assume that the exposure of students to course materials, and statements made and views expressed by a person as part of teaching, research or discussions about any subject matter that is connected with the content of a course, are unlikely to constitute harassment, unless it is otherwise demonstrated that these matters do in fact amount to harassment.

SEXUAL MISCONDUCT

10. The University's approach

- 10.1. The University does not tolerate any form of sexual misconduct.
- 10.2. We recognise that it is a serious problem that has a significant impact on the individual, their families and friends, their wider communities and our society. Where a student experiences any form of sexual misconduct, the University will work with that individual to identify and implement the appropriate terminology to refer to their own experience as a matter of personal choice.
- 10.3. People who experience sexual misconduct often experience trauma that can have significant long-lasting physical, emotional and psychological impact on those who have experienced it. However, not all people who experience sexual misconduct react in the same way to their experiences and, as such, their individual needs may vary considerably.
- 10.4. Anyone can experience sexual misconduct. However, some individuals may have increased vulnerabilities based on specific factors, such as gender, age, sexual orientation, race, language and physical or mental ability. They may then go on to experience barriers to disclosing, reporting and seeking support. The University is committed to breaking down those barriers and providing support, understanding and compassion where disclosures of alleged sexual misconduct are made e.g. by providing easy to use channels for making disclosures and developing our support for students who do so. The University recognises its responsibilities for assessing risk factors and putting measures in place to minimise the risk of incidents of sexual misconduct affecting its students.

11. The University's responsibilities and objectives

- 11.1. This policy has been developed in response to the University's recognition that it must play a pivotal role in addressing sexual misconduct within our community as a priority.
- 11.2. Our approach has been further informed and reviewed in light of the <u>Office for Students'</u> registration condition (E6) for preventing and addressing harassment and sexual misconduct affecting students in higher education.

- 11.3. The University has three key strategic objectives in seeking to prevent sexual misconduct from affecting its community:
 - 11.3.1. **Prevent sexual misconduct from occurring** as follows:
 - 11.3.1.1. The University is committed to working towards preventing sexual misconduct from occurring within its community.
 - 11.3.1.2. The University will seek to maintain an environment in which sexual misconduct is unacceptable.
 - 11.3.1.3. The University will ensure that its approach to combating sexual misconduct is clearly communicated to all students and staff.
 - 11.3.1.4. The University is committed to ongoing education, raising awareness and supporting prevention initiatives to combat sexual misconduct from occurring within its community, including mandatory training for students and ensuring that staff are appropriately trained.
 - 11.3.1.5. The University's approach will be overseen by the Safeguarding and Compliance Committee which reports to the Health, Safety, Safeguarding and Wellbeing Board (see section 7).
 - 11.3.2. **Respond to the needs of those who disclose sexual misconduct**, whether personally or as a witness as follows:
 - 11.3.2.1. Any disclosure of sexual misconduct will be treated with sensitivity and understanding.
 - 11.3.2.2. Appropriate support will be provided to any student that discloses an act of sexual misconduct.
 - 11.3.2.3. The University has in place appropriate procedures to respond to any allegation of sexual misconduct, regardless of where or when such incidents occur.
 - 11.3.2.4. The University has appointed a team of specially trained Student Support Advisors (SSAs) who are also Sexual Violence Liaison Officers (SVLOs) and have the competence and confidence to respond to the needs of students who disclose sexual misconduct.
 - 11.3.3. Respond to the needs of those who are accused of sexual misconduct:
 - 11.3.3.1. The University has appointed specially trained members of staff who have the competence and confidence to respond to the needs of students who are accused of sexual misconduct.
 - 11.3.4. **Ensure that those who have committed acts of sexual misconduct are held to account** through the University's Student Disciplinary Procedure or Staff Disciplinary Policy and Procedure and/or the criminal justice system where appropriate:
 - 11.3.4.1. Any allegation of sexual misconduct against a student falling within the scope of this policy will be referred for investigation under the University's Student Disciplinary Procedure. Those who have been found to have

- committed an act of sexual misconduct may be subject to sanction, including expulsion.
- 11.3.4.2. The University will ensure that those investigating allegations of sexual misconduct under the Student Disciplinary Procedure are appropriately trained. Where necessary and appropriate, the University may appoint a specially trained investigator external to the University to investigate allegations of sexual misconduct under the Student Disciplinary Procedure.
- 11.3.4.3. Necessary and proportionate precautionary action (including suspension) under the Student Disciplinary Procedure may be taken by the University against any individual who is accused of an act of sexual misconduct.
- 11.3.4.4. Where an incident of sexual misconduct falling within the scope of this policy is reported to the police, the University will liaise with the police as necessary to support its investigation. The University will not take any action that may prejudice or otherwise interfere with the criminal investigation process in any way.
- 11.3.4.5. Save for any necessary precautionary and/or immediate action, the University may defer the conclusion of its own investigation under the Student Disciplinary Procedure until the criminal process is at an end.
- 11.3.4.6. Any allegation of sexual misconduct against a member of the University's staff will be referred for investigation under the <u>Staff Disciplinary Policy and Procedure</u>.
- 11.3.4.7. Where it is concluded following an investigation under the University's Student Disciplinary Procedure or Staff Disciplinary Policy and Procedure that an incident of sexual misconduct has taken place, the University will undertake a "lessons learnt" review to consider whether it could have reasonably put in place any steps to prevent the incident from having taken place, together with any additional measures to put in place moving forwards.
- 11.4. These strategic objectives will be reviewed by the University's Safeguarding and Compliance Committee periodically and may be updated as necessary and appropriate.

12. How to make a disclosure of sexual misconduct

- 12.1. Students who have experienced an act of sexual misconduct are strongly encouraged to make a disclosure through the University's Report + Support portal. This enables disclosures to be made anonymously or by speaking to an advisor.
- 12.2. Alternatively, students may choose to make a disclosure of sexual misconduct to any member of the University's staff. A staff member receiving a disclosure of sexual misconduct affecting a student must refer the disclosure to the Report + Support team (reportandsupport@greenwich.ac.uk) for further action.
- 12.3. Where the University is made aware of an allegation made by a student, a Student Support Advisor (SSA) will be appointed to support the affected individual and to ensure that the individual understands the options available to them in terms of disclosing the allegation to

- the police and/or for investigation under the University's Student Disciplinary Procedure or Staff Disciplinary Policy and Procedure as appropriate.
- 12.4. The SSA will ensure that no pressure is put on the individual to take one course of action over another.
- 12.5. SSAs are also able to provide support and assistance to students where the allegations do not involve another member of the University community.

13. Available support

- 13.1. Students who disclose having experienced sexual misconduct will be provided with appropriate support.
- 13.2. The first point of contact for students will be the University's online platform Report + Support.
- 13.3. SSAs will be responsible for assisting the student to access relevant support services both within and external to the University.
- 13.4. Students who disclose having experienced sexual misconduct have the right to determine what and how much they choose to share about their experience. The University will not pressure any individual to make a formal report if they do not wish to do so.
- 13.5. In some cases, the University may be required to take certain action without the student's consent as set out in section 6 above, for example where there are concerns about a risk of significant harm to the student or to a third party. If this is necessary, the student will be informed and supported unless it is not reasonable, possible or practicable for the University to do so.
- 13.6. The University is also committed to providing support to any student against whom an allegation of sexual misconduct is made (see 11.3.3).

BULLYING, HARASSMENT, HATE INCIDENTS/HATE CRIMES AND DISCRIMINATION

14. The University's approach

- 14.1. The University does not tolerate any form of bullying, harassment, hate incidents/hate crimes and/or discrimination by students, staff and third parties.
- 14.2. Students are expected to treat all members of the University community with dignity, courtesy and respect regardless of any protected characteristic.
- 14.3. Bullying, harassment, hate incidents/hate crimes and/or discrimination may include (but are not limited to):
 - 14.3.1. Spreading malicious rumours.
 - 14.3.2. Insulting someone by words or behaviour.

- 14.3.3. Copying comments that are critical about someone to others who do not need to know.
- 14.3.4. Ridiculing or demeaning behaviour.
- 14.3.5. Exclusion or victimisation.
- 14.3.6. Unfair treatment.
- 14.3.7. Stalking or persistently displaying unwanted conduct to a person face-to-face, online or by another means of communication.
- 14.3.8. Physical violence or threats of violence based on a protected characteristic.
- 14.3.9. Displaying or circulating discriminatory literature or posters.
- 14.3.10. Online abuse, for example on social media.
- 14.3.11. Hate mail.
- 14.3.12. Racial harassment including derogatory name-calling, references to skin colour, racist jokes, ridicule for cultural difference, verbal abuse.
- 14.3.13. Disability harassment including not recognising competencies, drawing attention to disability or personal appearance, jokes, ignoring.
- 14.3.14. Ageist harassment including denigrating competencies, patronising, ridiculing, marginalising, leaving people out of activities.
- 14.3.15. Sexual orientation harassment including homophobic jokes or remarks, displaying or circulating homophobic material, threats to disclose sexual orientation or disclosing sexual orientation without permission, ridiculing civil partnerships or same-sex marriage.
- 14.3.16. Religion or belief harassment including ridiculing dress and personal appearance, offensive jokes or remarks, ridiculing religious requirements in dress.
- 14.3.17. Gender reassignment harassment including ridiculing dress and personal appearance, offensive jokes or remarks, persistent refusal to refer to another member of the University community by their correct name or gender after having been asked to.
- 14.3.18. Any other unwelcome behaviour that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- 14.3.19. Any other repeated conduct which a reasonable person would consider to be harassment.

As indicated in section 9, in accordance with our commitment to freedom of speech and academic freedom, the University will assume that course materials and statements made and views expressed as part of teaching, research or discussions connected with the content of a course are unlikely to constitute harassment.

15. The University's responsibilities and objectives

- 15.1. This policy aims to ensure that students can challenge behaviour which does not respect the rights, freedoms and dignity of others and to be able to disclose concerns without fear of victimisation.
- 15.2. The University aims to ensure that a fair, constructive and consistent approach is taken when dealing with student concerns and that issues are resolved as fairly and promptly as possible.
- 15.3. It is normally expected that a student who is experiencing bullying, harassment, hate incidents/hate crimes and/or discrimination will disclose the matter. However, where another student or member of staff becomes aware of bullying, harassment, hate incidents/hate crimes and/or discrimination affecting a student, they may also make a disclosure.
- 15.4. Failure by students and/or staff members to respond appropriately when they become aware of bullying, harassment, hate incidents/hate crimes and/or discrimination affecting students may be regarded by the University as a failure to take reasonable steps to prevent this kind of behaviour. This may potentially lead to action being taken under the Student Disciplinary Procedure or Staff Disciplinary Policy and Procedure as appropriate.
- 15.5. Where the University receives a disclosure of bullying, harassment, hate incidents/hate crimes and/or discrimination falling within the scope of this policy and the allegation is against a student, it will endeavour where possible to resolve the matter informally at local level at Stage 0 of the Student Disciplinary Procedure.
- 15.6. If it is not possible for the disclosure to be resolved informally or the matter is identified as sufficiently serious, the allegations will be referred for formal investigation under the Student Disciplinary Procedure or the Staff Disciplinary Policy and Procedure where the allegations are against a staff member.
- 15.7. Necessary and proportionate precautionary action (including suspension) under the Student Disciplinary Procedure may be taken by the University against any individual who is accused of an act of bullying, harassment, hate incidents/hate crimes and/or discrimination.
- 15.8. Students should therefore be aware that incidences of bullying, harassment, hate incidents/hate crimes and/or discrimination will not be tolerated and may ultimately lead to sanction, including expulsion.

16. How to make a disclosure of bullying, harassment, hate incidents/hate crimes or discrimination

- 16.1. Students and staff are strongly encouraged to submit allegations of bullying, harassment, hate incidents/hate crimes and/or discrimination through the University's Report + Support portal. This enables disclosures to be made anonymously or by speaking to an advisor.
- 16.2. Alternatively, allegations of bullying, harassment, hate incidents/hate crimes and/or discrimination may also be submitted as follows:

16.2.1. Student about another student

The student can raise the matter by contacting their faculty (or, where it relates to conduct in the University's halls, to Accommodation Services), for the matter to be considered under the appropriate procedure. The faculty/Accommodation Services will involve People Directorate where the allegation against a student relates to the student's work as a University employee. See Appendix 1 for sources of support.

16.2.2. Student about a member of staff or third party

The student should raise the matter using the <u>Student Complaints Procedure</u>. Subsequent investigation will determine whether an allegation about a staff member should be referred to the Staff Disciplinary Policy and Procedure. See Appendix 1 for sources of support.

16.2.3. A member of staff about a student

The staff member should raise the matter under the Student Disciplinary Procedure with the student's faculty. See Appendix 1 for sources of support.

Whilst the University would encourage disclosures to be made as set out above, it is recognised and appreciated that a student may choose to make a disclosure to any member of staff with whom they feel most comfortable or in the course of another University procedure. In the circumstances, members of staff should direct the student to appropriate sources of support and guidance as indicated above.

17. Available support

- 17.1. Any student who makes a disclosure of bullying, harassment, hate incidents/hate crimes and/or discrimination will be provided with appropriate support.
- 17.2. The first point of contact should be as indicated in 16.2.
- 17.3. Individuals who disclose having experienced bullying, harassment, hate incidents/hate crimes and/or discrimination have the right to determine what and how much they choose to share about their experience. The University will not pressure any individual to make a formal disclosure if they do not wish to do so.
- 17.4. In some cases, the University may be required to take certain action without the individual's consent as set out in section 6 above, for example where there are concerns about a risk of significant harm to the student or to a third party. If this is necessary, the individual will be informed and supported unless it is not reasonable, possible or practicable for the University to do so.
- 17.5. The University has appointed specially trained members of staff who have the competence and confidence to respond to the needs of students who are accused of bullying, harassment, hate incidents/hate crimes and/or discrimination.

APPENDIX 1

Guidance for students

Students are encouraged to disclose any concerns falling within the scope of this policy at the earliest opportunity. However, the University recognises that a student may not be sure if what they have experienced/are experiencing would be a breach of this policy or they may not feel ready to share their experience.

Where that may apply, students may find it helpful to:

- Keep a diary of any incidents of concern and note the date, time, place and what was said and/or done and the way it made them feel. The names of any witnesses should be noted.
- Retain any relevant documents and/or information.
- Speak to the individual(s) involved if the student feels comfortable to do so. Again, it would be helpful to keep a diary in case the student wishes to go on to disclose that matter to the University.
- If the student does not feel able to speak to the individual(s) involved, they may prefer to write to them to outline the behaviour they find unacceptable and ask for it to stop. A copy of any correspondence should be retained by the student together with any response(s).

If the behaviour does not stop or the student remains concerned, a disclosure should be made as set out in the policy. Always seek help and support if you are in any doubt.

Support for students affected by any of the issues raised in this policy is available from:

Report + Support

Report + Support is the University's portal for disclosing any form of harassment, including bullying, discrimination, hate incident/hate crime and sexual misconduct. Disclosures can be made anonymously or by speaking to an advisor. The site also provides information about these issues and the University's policies and guidance.

Student Wellbeing Service

Information, guidance and support to students, including confidential one-to-one counselling are available from our counselling and mental health services: see the <u>Student Wellbeing Hub</u>.

Bullying and Harassment

The University has information on the <u>Report + Support portal</u> on services available both within and external to the University, including who to contact in an emergency.

Discrimination

The University has information on the <u>Report + Support portal</u> on services available both within and external to the University, including who to contact in an emergency.

Hate Incident/Hate Crime

The University has information on the <u>Report + Support portal</u> on services available both within and external to the University, including who to contact in an emergency.

Sexual Misconduct

The University has information on the <u>Report + Support portal</u> on services available both within and external to the University, including who to contact in an emergency.

Greenwich Students' Union (GSU)

GSU's Advice Service provides independent and impartial advice to students.

Harassment and Sexual Misconduct: 'single comprehensive source of information'

As required by the Office for Students, the University has created a <u>webpage</u> which summarises the University's policies and procedures on student harassment and sexual misconduct, including intimate personal relationships between staff members and students.