

Student Harassment and Sexual Misconduct Policy

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Amendment History

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2	090924	Revised dates, roles, centres	C Whitmore
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Document Reviewers

Name	Role	Policy Responsibility
SLT	ONCAMPUS Leadership Team	Consulted
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Relevant Documents

Policies and Procedures
CEG Safeguarding and Prevent Policy (including Child Protection) Site Leadership Emergency Management Plan Central Leadership Emergency Management Plan OnCampus Complaints Policy OnCampus Student Disciplinary Policy OnCampus Student Attendance Policy OnCampus Student Wellbeing and Support to Study
Legislation and Government Guidance
This policy, and its associate procedures, has been drawn up on the basis of UK legislation, policy and guidance; it is applied, in whole or in part, to all CEG centres taking into account local legislation which may substitute where applicable UK law.

UK: Equality Act 2010

Approved by:	Signature	Date
OnCampus SLT	M Goodwin	21/07/25

In an emergency

In an emergency (for example, where there is an immediate and significant danger or a criminal act has been witnessed), call emergency services directly on 999 or 101 (European centres).

If this is an emergency on campus, please also call the university Security Team so that they can support the response.

If you are not in immediate danger, you can call the police on 101 to make a report and a Police Officer will arrange to meet with you to take a statement.

Make a report or access support

You can report harassment or sexual misconduct, or reach out for support at OnCampus by:

- Contacting a member of the centre Student Services team
- Completing the online self-referral form [Report a Concern | Send a Message to Our Support Team](#)
- Contacting the centre emergency phone
- Contact the university security team outside of normal opening hours

You are not on your own – you can access confidential support without committing to any decision about what action to take

24-hour support is available: [Samaritans](#) 116 123 or [Shout](#) text 85258

Please see Appendix C for further information about external, specialist support services.

Support for colleagues is available through our Staff Employee Assist Programmes. Please visit the Helpdesk for more information.

Please note:

CEG recognises the relationship with each partner university for students across all divisions. For students enrolled on Digital and iheed programmes, actions will be taken in accordance with the appropriate university policy and procedure.

This Policy applies to all OnCampus students and regardless of whether the alleged sexual misconduct takes place on OnCampus premises. Where circumstances require, we will initiate contact with, or respond, to the partner institution.

Students who wish to report sexual misconduct by staff, a person whose services have been contracted by or a visitor to OnCampus, should raise the matter through their Centre Director or by completing the online self-referral form. The report will be progressed in line with the Student Complaints Procedure, in consultation with the People Team.

This policy does not cover non-sexual violence and misconduct or harassment, which is considered as part of the Student Code of Conduct and Student Disciplinary Policy.

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1. Statement of Commitment and Values

- 1.1 CEG is committed to creating and ensuring an inclusive, positive and safe environment for all, in which all members of our community are equally valued and respected.
- 1.2 We take the safety, wellbeing and dignity of our students and staff very seriously and will not tolerate any form of inappropriate or harmful behaviour. We strive to create an environment where all members of the CEG community feel safe and respected and encourage students to come forward with concerns so that they can be dealt with impartially, promptly, and sensitively.
- 1.3 This policy sets out expectations in terms of maintaining healthy and respectful relationships and what is defined as unacceptable interpersonal behaviours.
- 1.4 We recognise that sexual misconduct, including sexual harassment and sexual violence, are serious issues for higher education institutions and wider society and that sexual misconduct can be experienced by anyone, anywhere.
- 1.5 We understand that sexual misconduct can have a profound and lasting impact on the lives of individuals, the wider CEG community and beyond. It can cause significant mental, emotional and physical harm. A student's education may also be affected. CEG will ensure that any reports of sexual misconduct are investigated and those reporting sexual misconduct are treated with dignity and respect.
- 1.6 All members of our community have responsibilities and are expected to play an active part in building and maintaining an inclusive, safe environment that is based on mutual respect and clear consent.
- 1.7 We are committed to:
 - preventing and eliminating all forms of sexual misconduct through a whole-CEG approach. Our actions to tackle sexual misconduct include the promotion of student and staff wellbeing, training and raising awareness, and promoting a culture of zero tolerance. This includes healthy positive relationships; social norms which do not tolerate any form of sexual misconduct; a culture in which bystanders are empowered to safely challenge inappropriate behaviour; and a culture in which all members feel able to speak out and will be supported and taken seriously
 - providing supportive and fair processes, including investigatory and disciplinary processes, supporting both the Reporting and Responding parties
 - learn from best practice in policy, research and evidence-based approaches to drive continuous improvement.

2. Overarching Principles

Application

2.1 We will respond to student reports of harassment and sexual misconduct in accordance with this Policy and the Procedure for Reporting and Responding to Incidents of Harassment and Sexual Misconduct Procedure (Appendix A).

2.2 Sexual misconduct covers a range of unacceptable behaviours of a sexual nature including sexual harassment and sexual violence. The behaviours described in this Policy are intended to help students to understand what we define as sexual misconduct and what would constitute a breach of these regulations.

2.3 This Policy applies to all current and former students sponsored by OnCampus.

2.4 This Policy applies wherever the incident occurred, whether on campus or elsewhere, including, for example, accommodation.

2.5 This Policy applies to sexual misconduct that takes place in the digital world, for example via e-mail, text message, instant messaging, social media, websites, chat rooms or online forums. This also includes videos and photographs. An example would be intimate image abuse or 'revenge porn' where intimate images may be shared via the internet. The CEG Safeguarding and Prevent Policy will apply if the reporting person is under 18 or an adult at risk.

2.6 We recognise the relationship with each partner university. Where circumstances require, we will initiate contact with, or respond, to the partner institution.

Support

2.6 The immediate priority upon disclosure of any experience of sexual misconduct, whether current or historic, is the safety and welfare of the disclosing party.

2.7. We understand that while a student may choose to share their experience of sexual misconduct immediately after the incident, it is common for incidents to be reported some time afterwards.

2.8 We will provide a safe space for students to reach out for practical guidance and emotional support from our centre Student Services team and central safeguarding team, who have received training from specialist external providers, including accredited Sexual Violence Liaison Officer (SVLO) training, and who can help students to access mental health support.

2.9 We will engage with local partners and external agencies to ensure we have an effective approach to preventing and responding to all forms of harassment and sexual misconduct.

2.10 We will facilitate referrals to relevant external specialist support services who can meet the needs of students from a range of diverse backgrounds.

2.11 Members of staff who have a complaint against a student should contact their line manager in the first instance.

Response

2.12 We will provide clear and consistent advice on reporting pathways to help students choose which options are best for them (Appendix F).

2.13 We understand that sometimes, a student may simply wish to be heard and obtain support. The Report a Concern Online Tool enables current and former students to report sexual misconduct. There is the choice to access support from an appropriate member of staff or to make an anonymous report.

2.14 Some incidents of sexual misconduct may also constitute a criminal offence and may be addressed through criminal proceedings or internal disciplinary proceedings or, in some cases, both. Any internal proceedings would normally be put 'on hold' until the criminal proceedings are concluded. Further information about the distinction between criminal and internal disciplinary proceedings and how this is managed is provided in Appendix A.

2.15 We will respect the right of the individual making a disclosure to choose how to proceed. However, in certain circumstances, where there is a clear and immediate risk to the health, safety and well-being of the disclosing party or evidence of a criminal act, then we reserve the right to refer the matter to the police.

2.16 Support will be provided to all parties involved. Where the Reporting and Responding persons are both students, they will be assigned different members of the centre Student Services team to ensure impartiality.

2.17 We will hold accountable any individual who has committed sexual misconduct. This may include the application of restorative and disciplinary sanctions, including withdrawal and reporting to the relevant visa authority.

2.18 Due to the sensitive nature, complaints of harassment or sexual misconduct will be investigated with particular care and will remain, where possible, confidential to the relevant parties. CEG will act in compliance with our Safeguarding and Data Protection policies, the Data Protection Act 2018 and any other applicable Data Protection Laws.

2.19 If it is deemed that the safety of an individual(s) is at risk of serious harm, confidentiality in these circumstances may be overridden by legal obligations to disclose.

2.20 CEG will not use non-disclosure agreements or confidentiality clauses to prevent Reporting Persons from speaking out in cases of harassment and sexual misconduct. It is important that all our students and staff feel safe and supported and the use of such clauses would be considered to be wholly unacceptable.

3. Definitions

What is Harassment and Sexual Misconduct?

3.1 Harassment is defined as any unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics: age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

3.2 Sexual misconduct is defined as any unwanted conduct of a sexual nature which occurred in person or by any other means including but not limited to; letter, e-mail, text message, instant messaging, social media, websites, chat rooms or online forums. This list is not exhaustive, however it is indicative of behaviour that would be considered unacceptable by CEG:

- Any unwanted sexual act or activity where consent is not, or cannot be given
- Sexual intercourse or engaging in a sexual act without consent; this is rape or sexual assault
- Attempting to engage in sexual intercourse or other sexual act without consent
- Inappropriate or unnecessary physical contact, including invasion of personal space and sexual touching
- Kissing without consent

- Making unwanted, abusive or degrading remarks of a sexual nature
- Recording and/or sharing intimate images or recordings of another person without their consent
- Creating, displaying or circulating sexually explicit materials including image based sexual abuse
- Coercive demands for sexual favours Stalking (unwanted, repeated, obsessive and/or controlling behaviours that make someone distressed or scared)
- Stalking
- Domestic abuse (including physical, emotional and financial abuse and coercive control)
- Misuse/abuse of power
- Intimidation, or promising resources or benefits in return for sexual favours
- Inappropriate showing of sexual organs to another person
- Homophobic/Transphobic comments and jokes about sexual orientation and gender identity, gossip and speculation about a person's sexual orientation and/or gender identity
- Outing or threatening to out someone in any capacity for their LGBTQ+ identity

Consent

3.3 Consent is an ongoing process of discussing boundaries and choice, and what you are comfortable with.

3.4 Consent should be clearly and freely communicated, and it cannot be given by individuals who are underage, intoxicated or incapacitated by drugs or alcohol, or asleep or unconscious. It is not considered consent if someone agrees to an activity under pressure of intimidation or threat.

3.5 Consent cannot be assumed based on previous experience and may be withdrawn at any time.

3.6 Please refer to Appendix E for a full list of definitions used in this policy.

4. Education and Compliance Monitoring

Education will include:

- 4.1 Educational activities for students, including personal tutorials, so they understand what sexual misconduct is and that it is not tolerated, what consent is and when it is and isn't given, and how to safely challenge unacceptable behaviour by being an active bystander
- 4.2 Appropriate training so that all relevant staff are aware of this Policy and know how to respond appropriately where a student shares their experience of sexual misconduct and signpost them to support
- 4.3 Awareness-raising communications and events, for example actions to challenge any unconscious bias or unhelpful myths around sexual misconduct.

Evaluation:

4.4 We will evaluate the impact of our work in this area in terms of changing attitudes and behaviours. This will be informed by consultation with students as well as the latest research and sector guidance, and we will review our policy and procedures in the light of this learning to ensure it remains relevant.

4.5 We include feedback surveys in our training for students and staff, evaluating the results and making changes to the training where appropriate.

4.6 We will also review the outcomes of cases where complaints have been made under this policy to check that the procedures have been followed and to identify any points that can be learned from those cases and implement any necessary changes. When carrying out any reviews or monitoring, we will ensure that individual's personal data is handled in accordance with the applicable Data Protection laws.

Records Management:

4.7 We will maintain a confidential central record of formal reported incident(s)s covered by this procedure, including anonymous disclosures, to engage effectively in prevention and response initiatives.

4.8 The Director of Student Experience and Safeguarding will ensure that the Executive Board (and any relevant sub-committees) are regularly provided with anonymised data concerning the cases that are dealt with under this Procedure.

4.9 All records are maintained in accordance with the CEG Records Retention Schedule further information can be found within the CEG Privacy Notice <https://www.cambridgeeducationgroup.com/privacy-policy/> or requested via the Data Protection team DPO@ceg-uk.com.

APPENDIX A

The Procedure for Reporting and Responding to Incidents of Harassment and Sexual Misconduct

1 Introduction

1.1 This Procedure sets out how we will deal with alleged incidents of sexual misconduct and harassment that involve members of the OnCampus community. It should be read alongside the OnCampus Student Harassment and Sexual Misconduct Policy.

2. Scope

2.1 This Procedure applies if:

- you are a student and have experienced sexual misconduct
- if you are a student and an allegation of sexual misconduct has been made against you
- wherever the incident occurred, whether on any OnCampus site or elsewhere, including, for example, accommodation. It is also recognised that sexual misconduct and harassment can occur online, by mobile phone and through social media.

2.2 Students who wish to report sexual misconduct by staff, a person whose services have been contracted by OnCampus or a visitor to OnCampus should raise the matter through their Centre Director or by completing the online self-referral form [Report a Concern | Send a Message to Our Support Team](#). The report will be progressed in consultation with the People Team.

2.3 This Procedure applies to all reported incidents of sexual misconduct. It does not cover incidents of non-sexual harassment or misconduct which should be considered under the OnCampus Student Complaints Policy.

2.4 If a conflict arises between this Procedure and any other procedures of OnCampus, then the Director of Student Experience and Safeguarding will consult with the Student Complaints Team to determine which procedure will be used.

3. Support

3.1 We are committed to providing effective, timely and targeted support for all members of our community affected by sexual misconduct. This will include support for their wellbeing and to enable them to participate fairly in the process.

3.2 Support will be non-judgmental and tailored to the individual, regardless of whether the matter is being dealt with by the police or by OnCampus, and whatever the outcome of the investigation, criminal or disciplinary proceedings.

3.3 Internal support is provided by the centre Student Services team in the first instance. This team will help students to access relevant internal and external specialist support as appropriate. This may include:

- a referral to counselling or mental health support on campus
- a referral to specialist support in the local area, for example the Sexual Assault Referral Centre (SARC, Appendix D)
- a referral to a national organisation (see Appendix C).

3.4 Students will also be offered support to address any impact on their academic studies, including support in applying for Extenuating Circumstances if applicable.

3.5 In the case of student upon student sexual misconduct, both the Reporting and Responding student and any other students involved may be accompanied at any stage of the process by a person of their choosing for support, who is not involved as a witness in the case. This may be an advisor from the centre Student Services team or an external support worker, such as an Independent Sexual Violence Advisor (ISVA).

4. Responsibilities

4.1 Any member of staff may be approached by a student who wishes to share their experience of unacceptable interpersonal behaviour. We will provide guidance for all staff which is relevant to their role, to support them to respond in a professional and sensitive manner, and to ensure the student is referred to their centre wellbeing team.

4.2 The centre Student Services team is responsible for providing effective, timely and tailored support for all students involved in the process.

4.3 The People Team will be involved where the responding person is a member of CEG staff to ensure that the relevant student and staffing procedures are followed in a coherent manner and that all parties are treated fairly.

4.4 The CEG Executive Team have oversight of this Procedure and the associated policies. Day-to-day responsibility for the management of the process is delegated to the Director of Student Experience and Safeguarding.

4.5 We recognise the relationship with each partner university. Where circumstances require, we will initiate contact with, or respond, to the partner institution.

5. Initial Steps

5.1 A student may choose to share their experience of harassment and/or sexual misconduct at any time. We appreciate that this takes courage and will aim to make this as straightforward and supportive as possible. There are many ways in which students can share their experience, including:

- with any member of staff, for example a tutor
- with their centre Student Services team, by telephone or email, during a drop-in session or using the online self-referral form
- through an application for Extenuating Circumstances or an Academic Appeal
- to another student, friend or family member, who may subsequently bring the matter to the attention of the centre.

5.2 Wherever a student shares their experience, they will be referred to their centre Student Services team at the earliest opportunity. The student will be given the information, time and support to decide how they wish to proceed and the levels of support that are right for them (Appendix F). This will normally involve one or more of the following options:

- to inform OnCampus on an anonymous basis for information only
- to share their experience for the purposes of receiving support. If the student does not want action to be taken, we will respect their wishes, unless there are overriding concerns about a risk of harm to the student or others. These will be explained to the student and further information can be found in the CEG Privacy Notice in the section 'how we use your personal data'

- to understand an informal resolution; this option is dependent on the person alleged to have committed the misconduct being willing to participate
- to report to the police
- disclose to the local Sexual Assault Referral Centre (SARC) or similar local body. Anyone can attend a SARC independent of making a decision about formally reporting the incident to or the police. The benefit of doing so is that the SARC can securely preserve evidence in the event the student later chooses to report to the police (Appendix D)
- to make a report to OnCampus about the behaviour of another OnCampus student, staff member, contractor or third party (eg accommodation, university staff or student)
- to take no further action at this time; in this case advice will be provided regarding the preservation of evidence which may be needed if they subsequently decide to make a report to the Police or to submit a formal complaint to OnCampus.

In all of the above, those involved will be informed of the ongoing support available to them from OnCampus and other organisations.

5.3 We understand that it is important to minimise the number of times that the Reporting Person is asked to repeat details of their experience to different members of staff. If a student shares their experience with their centre Student Services team and then chooses to make an online report, they will be asked for their permission for any meeting notes to be passed to the person who will progress the report.

5.4 If the incident is historical, the person who has experienced it can still disclose it and receive support.

6. Reporting Pathways and Actions

6.1 A student may choose to refer an incident of sexual misconduct and/or harassment to the police or to report it to OnCampus for consideration under its internal procedures, or may do both. The student will be supported whichever pathway they choose.

6.2 The nature and scope of an internal investigation and disciplinary process and an external criminal investigation process are fundamentally different. OnCampus cannot make a finding about whether a criminal offence has been committed because it is not empowered to do so. Rather, an internal investigation will aim to establish whether there has been, on the balance of probability, a breach of CEG's internal policies and regulations and/or any act or omission of OnCampus staff. The most severe sanction is expulsion (students) or dismissal (staff) from CEG.

6.3 Although some allegations under consideration may also amount to criminal offences, CEG's disciplinary procedures do not operate as a court of law and do not make findings of criminality.

6.4 Whilst it does not have the same legal or forensic investigatory powers as the police, OnCampus can gather statements from the parties involved and other relevant evidence such as screenshots, but OnCampus' powers are limited.

6.5 If an allegation is reported or made through the criminal justice system, this does not prevent OnCampus from taking action under its internal procedures, whatever the outcome of the criminal proceedings.

6.6 Third Party Disclosures, where the person disclosing has not experienced the sexual misconduct, violence and harassment, will be recorded for trend monitoring purposes. OnCampus will, where possible, respect the right of the individual who experienced the sexual misconduct, violence and/or

harassment to choose how to take forward (or not), a report or disclosure rather than rely on a third party to make this choice for them. OnCampus retains the right to investigate a third-party disclosure should it feel that is an appropriate measure (at all times taking into consideration what is best for the individual).

7. Referring to the Police

7.1 If a student wishes to refer an incident of unacceptable interpersonal behaviour to the police, then we will support them.

7.2 Where a student or staff member is being investigated by the police or other external authority, we may put any internal investigation 'on hold', because the criminal process may take priority.

7.3 We can put precautionary measures in place to protect and support all parties whilst the police investigation is underway.

7.4 Precautionary measures will be kept under review in the light of any developments in the police investigation. A 'Precautionary Action: Duty of Care' risk assessment will be completed. OnCampus will liaise with the police where appropriate, for the purposes of supporting and safeguarding all parties, in line with information sharing protocols and data protection legislation.

7.5 We will review the matter when the criminal process has been concluded, regardless of the outcome, to determine whether a breach of our internal policies and regulations has taken place and whether any of the parties involved require support.

7.6 If the police decide to take no further action or there is an acquittal at a trial, this does not prevent OnCampus from taking action under its internal disciplinary procedures and it does not suggest that a vexatious, malicious or unfounded report has been made. Where the trial has completely exonerated the subject of the complaint and it has been found that the Reporting Party has made a false, bad faith or misleading complaint, we may revisit any disciplinary sanction issued to the Reported Party and may consider disciplinary action against the Reporting Party, if they are an OnCampus student or a member of staff.

7.7 If a member of the CEG community is convicted of a related criminal offence or accepts a police caution, this will be taken as evidence that the behaviour is proven. The case will be referred to the Director of Student Experience and Safeguarding in the case of a student, or to the appropriate Senior People Team Lead in the case of a staff member, to be considered under the student or staff Disciplinary policies. It may not be necessary for a further full investigation to take place, and the complaint will be deemed proven.

8. Anonymous Reporting

8.1 We are committed to dealing with all reports of unacceptable behaviour in a supportive and fair manner. The Report a Concern tool enables a student to make an anonymous report if they wish.

8.2 Where a student chooses not to provide their name or contact details, this may limit our ability to take action in response to the report.

8.3 Anonymous reports are, however, still a valuable source of information. The information provided will be used to monitor the types and prevalence of incidents taking place within our

community and take positive, preventative action. A report on the data collected would be considered by the Executive Board (and any relevant sub-committees).

8.4 The anonymous reporting option requires the reporting person to select an option as to why they chose to report the incident anonymously. These responses will be considered as part of our strategy to remove barriers to reporting.

8.5 Where an anonymous report is made about the behaviour of a CEG staff member or student, we may initiate enquiries if there is considered to be a serious and compelling case which can be corroborated by other sources of evidence. This may involve an informal discussion with the responding person.

8.6 In certain circumstances, where there is a clear and immediate risk to the health, safety and well-being of an individual or evidence of a criminal act, we reserve the right to refer the matter to the Police.

9. Informal Resolution

9.1 The Reporting Person may choose to report their experience of unacceptable behaviour from another member of the CEG community with the intention of facilitating an agreement between them to limit all future contact. Informal resolution can only go ahead with the mutual agreement of both parties.

9.2 A nominated member of the centre team will review the case and will consult with centre colleagues, the central safeguarding team, the People Team and the university, as necessary, to determine whether informal resolution is appropriate and practicable in all the circumstances of the case.

9.3 The nominated member of the centre team will facilitate separate meetings with both parties to discuss measures to limit contact between them. These measures will be set out in a No Contact Agreement which both parties will be asked to sign. In these circumstances, no formal finding will be made, although the responding person may also agree to write an apology or participate in an educational activity.

9.4 The case may be referred for a formal investigation where one or both parties do not agree on the proposed informal measures, or in the event of a breach of the No Contact Agreement.

10. Initial steps on receipt of a complaint

10.1 If the Reporting Party confirms that they wish to make a complaint, the Centre Director must be informed. The Centre Director must inform the Director of Student Experience and Safeguarding.

10.2 A precautionary risk assessment will normally be conducted. The purpose of the risk assessment is to protect the interests of all parties. Serious cases will be dealt with as a matter of urgency and other cases in a timely manner.

10.3 The Director of Student Experience and Safeguarding will determine whether a Central Leadership Emergency Team meeting (CLET) should be convened based on the information available, or whether further information may need to be gathered before a decision can be made on whether a CLET is necessary.

10.4 Where the Director of Student Experience and Safeguarding determines that sufficient information exists, and it is relevant to do so, they will make arrangements for a CLET meeting. The Panel may meet in person, or virtually.

10.5 Pending a meeting of the Central Leadership Emergency Team (CLET), the centre team shall take such steps as may be necessary to:

- ensure both the Reporting Party and the Responding Party, together with any witnesses (as relevant), receive appropriate academic and pastoral support; and
- ensure that confidentiality is maintained.

11. CLET Case Review

11.1 The membership of the CLET Case Team will depend upon the nature of the Reported Incident(s) and will be determined by the Director of Student Experience and Safeguarding. The membership must include, as a minimum, 3 of the following role holders:

- Group Chief Operating Officer
- CEG Safeguarding and Prevent Lead: Director of Student Experience and Safeguarding
- Chief Academic Officer (or nominee)
- Director of Global Study Centres (or nominee)
- A member of the People Team, where the responding person is a member of CEG staff;
- Director of Global Engagement;
- Group General Counsel; and
- A senior representative from the centre(s) of the Reporting Party/Responding Party (as relevant).

11.2 The CLET may co-opt additional members if required, including external stakeholders, for example, from a sexual assault referral centre, the police or partner university. The CLET will have received appropriate training and we will aim as far as possible, to ensure the diversity of members.

11.3 The CLET will convene in private session to consider:

- potential risks and any appropriate and proportionate precautionary measures to mitigate those risks and secure the situation, until the process has been brought to a conclusion;
- any support needs for the Reporting and Responding Persons involved, from a safety, wellbeing and academic perspective;
- whether the circumstances of the case require a referral to an external agency e.g. the police, the DBS or LADO.

11.4 If the matter is to be dealt with under CEG's internal procedures, the Case Team will identify which internal policy and procedure should be invoked. This may be the Student Disciplinary Policy, the Student Wellbeing and Support to Study Procedure, the Student Complaints Policy – Post Arrival, or the staff CEG Disciplinary Policy.

12. Precautionary Measures

12.1 Precautionary measures may be taken to secure the safety, wellbeing and academic integrity of all parties involved, whilst the internal or external investigation is carried out.

12.2 The CLET will act fairly in seeking to balance the rights of all parties and to minimise the impact for those involved on their studies and work, during this period. Precautionary measures are not intended to be punitive and do not indicate that CEG has made a finding of wrongdoing. The 'Precautionary Action: Duty of Care' risk assessment tool will be used.

12.3 Precautionary measures for students may include but are not limited to:

- that the Responding Person has no contact with the Reporting Person, either directly or indirectly via any means including social media
- restrictions from accessing specified parts of the campus
- that the responding student can only access buildings or facilities at specified times
- relocation to alternative accommodation, where possible
- a temporary exclusion from engaging in an activity e.g. acting as a student representative
- temporary exclusion from a club or society
- restrictions on engaging with learning activities e.g. that the student can only participate online or via recordings etc
- an interim suspension from campus
- a full suspension which prohibits the student from entering OnCampus or university premises or engaging with any OnCampus activity, including contacting other students.

12.4 If a suspension of rights is issued, the person alleged to have committed the misconduct will be informed in writing and, wherever possible, in person. They will be told what they need to do in order to comply with the suspension of rights. They will be assigned a member of the centre Student Services team, who will be their main point of contact. This will be a different team member to that assigned to the person who has disclosed.

12.5 Precautionary measures for staff would be decided in consultation with the relevant People Team member and Centre Director. The CLET will take steps to protect students from harm and will support them to continue with their studies, whilst treating the member of staff fairly and in accordance with CEG procedures.

12.6 Where circumstances require, actions will be discussed with the partner institution.

12.7 Following a risk assessment, the outcome and any precautionary measures will be reviewed every 4 weeks and updated as necessary. Additional review meetings may be convened as believed necessary.

12.8 The Director of Student Experience and Safeguarding will be responsible for ensuring that any decisions or recommendations made at the CLET meetings are recorded and acted upon, liaising with relevant OnCampus managers as appropriate within the established institutional and academic governance arrangements.

13. Investigation Process

13.1 Where the CLET recommends that a Report or Complaint should be investigated for a potential breach of this Policy, they will appoint one or more Investigating Officers, depending on the nature and complexity of the case. The Investigating Officer(s) will normally be designated member(s) of CEG staff who have not been involved with the parties or the alleged incident, and who has received training in conducting a trauma-informed investigation. CEG may, exceptionally, appoint an external investigating officer where the CLET determines that this would be appropriate in the circumstances of the case.

13.2 The investigation is an evidence-based process and decisions will be made on the balance of probabilities. The purpose of the investigation will be:

- to provide each party with a full and fair opportunity to explain their version of events; and

- to establish the facts about the circumstances giving rise to the report. The investigation will not consider whether the report is justified, but whether there is evidence that it is more likely than not that an offence has occurred.

13.3 The Investigating Officer(s) will act fairly and gather evidence that supports either side of the matter.

13.4 A nominated member of staff will make direct contact with any other students affected by the incident to make them aware of support services, as agreed by the CLET risk assessment.

13.5 The Investigating Officer(s) will provide a safe, comfortable and supportive environment for the Reporting and Responding Persons and any witnesses to discuss their version of events, with opportunities for breaks if required. A welfare check will be conducted at each meeting to ensure that all parties are aware of the support services available for them. Where the Investigating Officer identifies any risk to the health, safety or wellbeing of any party, this will be addressed in line with CEG's safeguarding policies and procedures. Reasonable adjustments will be made where appropriate in the light of any inclusivity needs, to ensure that all parties can participate.

13.6 All students involved in an investigation will be entitled to be accompanied for support by a friend or appropriate advisor (eg IDVA) who is not involved as a witness in the case. The role of the accompanying person will be to provide support. The parties will normally be required to give their own account of events and to respond to questions.

13.7 The Investigating Officer will normally:

- contact the Reporting Person to inform them of any precautionary measures and any support arrangements that have been put in place to protect and support them, whilst the investigation is carried out.
- meet with the Reporting Person first to hear their account of events and to identify any witnesses or other evidence which may be relevant to the case
- meet with the Responding Person who will be asked to give their version of events and comment on the evidence and to identify any witnesses or other evidence which may be relevant to the case.
- invite any witness(es) to attend an interview or to provide a written statement. Key witnesses may be required to attend any subsequent disciplinary hearing.

13.8 The Responding Person will be given:

- a written summary of the allegation
- details of the precautionary measures (if any) that have been agreed as a result of the risk assessment.
- opportunity to ask questions about the process and to make representations about the precautionary measures if they consider that these might have a disproportionate impact on their life, work or studies. The measures will be reviewed in the light of any such representations.
- information about the process and the potential outcomes and what will happen next (Appendix F)
- information about pastoral support for their wellbeing and procedural support to enable them to participate fairly in the process.

13.9 All those interviewed will be reminded of the need to maintain confidentiality and will be informed that any evidence they give will normally be shared with both the Reporting and Responding Persons, in the interest of fairness and natural justice. Meeting notes will be kept and

sent to interviewees. Interviewees will have opportunity to make any comments which will be incorporated or held alongside the notes.

13.10 The Investigating Officer(s) will determine the scope of the investigation which will be proportionate to the seriousness and complexity of the case. They may hold additional meetings or consult with additional parties as necessary to obtain relevant information and evidence. They may also consult with external parties to obtain specialist advice as required, whilst maintaining confidentiality.

13.11 If the matter is being investigated by the police, the Investigating Officer(s) will consult with the police regarding contacting the Responding Person, so as not to compromise the police investigation.

13.12 If the Responding Person makes counter allegations, the Investigating Officer(s) will confirm whether they wish for these to be considered formally, in which case they must be submitted in writing with supporting evidence within a reasonable timescale. The Investigating Officer(s) will review any counter allegations and decide whether they can be addressed within the investigation, or whether they are of a serious and/or discreet nature and should be considered under a separate process.

13.13 While very rare, the possibility of false, bad faith, or misleading reports is recognised. Submitting a complaint that is not in good faith or providing false or misleading information in any investigation of a complaint is prohibited. If a complaint is found to be false, misleading or in bad faith, it will be dealt with in accordance with the Student Disciplinary Policy, as appropriate.

13.14 The Investigating Officer(s) will prepare a report of their findings. This will normally include:

- an overview of the alleged behaviour
- a chronology of events
- a summary of the case including those facts which have been established and any points which remain in dispute
- any mitigating factors, for example, any health condition which may have affected the behaviour; e. any aggravating factors, for example, if the Responding Person has failed to adhere to an undertaking of good conduct
- extracts from the relevant policies or regulations in question.

13.15 Copies of all interview summaries, statements and other evidence, such as e-mails, screenshots or security reports should be cross-referenced and included as appendices. Any information that is not relevant to the case will be redacted and will be assessed on a case-by-case basis.

13.16 The Investigating Officer(s) will conclude whether, on the balance of probabilities, there has been a breach of CEG policies and regulations relating to harassment or sexual misconduct, or any other regulations. The Investigating Officer(s) may conclude that:

- the evidence does not support a breach, therefore, no further action is required. The case will be dismissed and no disciplinary action will be taken, but continued support will be offered to all parties
- the evidence does indicate a breach of CEG policy and procedures and disciplinary action is required.

13.17 Where the Responding Person is a student, the Centre Director, together with the Director of Student Experience and Safeguarding will decide on the next steps in line with the Student Disciplinary Policy. The decision whether to share the report will be made on a case-by-case basis.

13.18 Where the Responding Person is a member of staff, the Investigating Officer will recommend whether the case should be referred under the staff disciplinary policy.

13.19 The CLET will re-convene for a case review meeting when the internal or external investigation has been concluded to 'close the loop' and agree on the next steps.

14. Disciplinary Hearing

14.1 The disciplinary hearing will be conducted in line with the process set out in the Student Disciplinary Policy where the Responding Person is a student. Members of the disciplinary committee will be selected on the basis that they have had no previous involvement in the case. We will aim as far as possible, to ensure the diversity of members.

14.2 The disciplinary committee may seek specialist advice where required, including from external parties, whilst maintaining confidentiality.

14.3 Where the allegation relates to a breach of CEG policy relating to harassment and sexual misconduct, the Reporting Person may be given the option to attend the disciplinary hearing. Whilst their attendance is encouraged, it is not mandatory if this would have a detrimental impact on their health and wellbeing. If the Reporting Person agrees to attend, arrangements can be made for them to give evidence in a safe place and for any questions by or on behalf of the responding person to be filtered through the Chair.

14.4 The Reporting Person may submit an impact statement to be considered by the disciplinary committee. This will be read out by a member of the centre Student Services team at the end of the hearing after a decision has been made on the merits of the allegation and will be taken into account by the committee in deciding on the sanction.

14.5 Where the Responding Person is a member of staff, the staff disciplinary policy will be followed.

15. Outcomes

15.1 The Reporting Person will be informed of the outcome including whether the alleged behaviour has been proven on the balance of probabilities, the reasons for the decision and any remedies or actions that directly affect them. If possible, this will take place in person and will include any measures to support them from an academic and wellbeing perspective or to alleviate concerns about their safety on campus. We will also state where any action will be taken as a result of learning from the report. An outcome letter will set out the Reporting Person's right to request a review in line with Stage 3 of the Student Complaints Procedure.

15.2 We will not normally disclose the details of any sanctions imposed as a result of disciplinary action, as these are personal to the Responding Person. However, information about a sanction may be shared where it directly affects the Reporting Person and their feelings of safety on campus, for example, where conditions have been imposed on the future conduct of the Responding Person.

15.3 The Responding Person will receive an outcome including whether the alleged behaviour has been proven on the balance of probabilities, the reasons for the decision and, where relevant, any

sanction which has been imposed a result of any disciplinary process. Any sanction will be intended to address the seriousness of the offence, the interests of the Reporting Person and the wider OnCampus community. The outcome letter will set out the Responding Person's right of appeal in line with the Student Disciplinary Policy. In the case of a staff member, the Staff Disciplinary Policy will be followed.

15.4 The circumstances and context of each case will be taken into account when determining whether a penalty(s) should be imposed and if so, which penalty(s) should be imposed and, where relevant, the timeframe for compliance. The penalties/actions for students permitted under this policy are:

- no further action
- informal resolution
- a caution, which means that no penalty is imposed, but if the student is found guilty of the same or similar offence on a subsequent occasion in the following 12 months (or some other specified period) they will then be dealt with for both offences
- a written warning
- a behavioural contract
- compulsory attendance at an appropriate workshop(s)
- restitution of damage (where physical damage has been caused)
- restorative justice (e.g. a letter of apology) where the Reporting Party requests it
- temporary or permanent exclusion from the use of specific OnCampus/university facilities or services
- a recommendation that the Group Chief Operating Officer permanently excludes the student from the programme of study. The student would be withdrawn with the required notification to the appropriate visa authority.

15.5 Limited information about outcomes may be shared with witnesses where there are concerns about retribution or victimisation.

15.6 If the Responding Person leaves an OnCampus course before an investigation has been completed, we will normally continue with the investigation and make a finding on the balance of probabilities. Although it is unlikely that a sanction would be imposed, it is important for the Reporting Person to receive an outcome and to have a clear record of events.

15.7 If one or other party interrupts their studies before the process has been completed, we will not normally resume the process upon their return, unless both parties give permission for it to continue.

16. Review Process

16.1 If the Reporting Party or the Responding Party is a student and they are dissatisfied with the outcome of the case, or if they believe the matter has not been handled fairly in accordance with this Procedure, they may request a review in writing, in line with Stage 3 of the OnCampus Student Complaints Policy – post arrival. Support is available via the centre Student Services team regarding the appeals process and grounds for appeal.

16.2 If the Reporting Party or the Responding Party is a member of staff and they are dissatisfied with the outcome of the case, or if they believe the matter has not been handled fairly in accordance with this Procedure, an appeal can be made through the staff disciplinary process. The Reporting Person should submit their request for review of their case as described in Stage 3, Final Review by Reviewing Officer, OnCampus Student Complaints Policy.

16.3 Where the Responding Person is a student and has incurred a disciplinary sanction, they will have the right to submit an appeal in line with the Student Disciplinary Policy. The Responding Person should submit their request for a review of their case as described in the Student Appeals Process of the OnCampus Student Disciplinary Policy

16.4 The relevant Party must normally submit their request for review, as described in the Student Complaints Policy for the Reporting Person, and the Student Disciplinary Policy for the Responding Person.

16.5 The review request should include details of why the Party is dissatisfied, in accordance with the grounds of appeal as specified under the relevant policy.

16.6 The review request(s) will be reviewed by the Chief Academic Officer or a relevant appointed senior member of staff (“Reviewing Officer”) who has not had previous involvement in the case. The Reviewing Officer may be asked to review the way the process has been handled. The Reviewing Officer will review the appeal and exercise discretion and judgement as to whether further investigation is necessary. The Reviewing Officer will acknowledge receipt of the appeal within 5 working days of receipt. Indicative timescales for this stage are that a response will be sent within 3 weeks of receipt of complaint. If this is not possible, an alternative timescale will be issued to the student.

16.7 The appeal will normally take the form of a paper review unless the Reviewing Officer decides that a new hearing is required. In all cases the detailed reasons for the first decision will be made available, and the Chair of the Case Team panel invited to assist the Reviewing Officer. If required, the Reviewing Officer may also consult the original Investigating Officer and will notify the members of the original panel if the decision is significantly changed.

16.8 The grounds to request a review will be the same for both the Responding and the Reporting Person as follows:

- that relevant new evidence or circumstances have become known, which the student could not have reasonably made known at the time of the investigation or hearing
- that there was an irregularity or unfairness in the conduct of the procedure, and this materially affected the outcome
- that the decision and outcome were unreasonable in the light of the evidence provided.

16.9 If there are no grounds for appeal, both parties will be informed, a Completion of Procedures (COP) letter will be issued to the Responding and/or Reporting Person, and both parties will be signposted to ongoing wellbeing support. Upon completion of the appeal, if either Party remain dissatisfied, they will receive a COP letter which will enable them to refer their case to the OIA for review.

16.10 The Reviewing Officer has power to confirm, set aside or vary a finding or decision, or to set aside or vary any penalty imposed. This may include increasing the original penalty imposed.

16.11 The Person who requested the review will be informed of the outcome of the review in accordance with the arrangements and timescales set out in the relevant procedure. The decision of the review will be final.

16.12 The other Person will not be informed that a review request was made, its details, or its outcome unless the review is upheld and any further action materially affects the other Party.

16.13 If the Responding Person is dissatisfied with the outcome of their appeal, a Completion of Procedures (COP) letter will be issued.

16.14 For students enrolled at a study centre in England, the COP letter will enable the student to refer their case to the Office of the Independent Adjudicator (OIA) for review should they wish to do so.

17. Office of the Independent Adjudicator for Higher Education

Please note: the Office for the Adjudicator for Higher Education applies only to students who are enrolled at a study centre in England.

17.1 The Office of the Independent Adjudicator for Higher Education (OIA) runs an independent scheme to review student complaints. OnCampus is a member of this scheme. If a student is unhappy with the outcome, they may be able to ask the OIA to review their case. You can find more information about making a complaint to the OIA, what it can and can't look at and what it can do to put things right here: <https://www.oiahe.org.uk/students>.

17.2 A student must normally need to have completed the OnCampus Complaints and Student Disciplinary Procedures before making a complaint to the OIA. OnCampus will send a letter called a "Completion of Procedures Letter" at the end of our processes when there are no further steps you can take internally. If the complaint and/or appeal is not upheld, OnCampus will issue a Completion of Procedures Letter automatically. If the complaint and/or appeal is upheld or partly upheld, the student can ask for a Completion of Procedures Letter. For more information about Completion of Procedures Letters in the OnCampus Complaints Policy.

18. Equality and Diversity

18.1 CEG recognises that any individual can experience unacceptable interpersonal behaviour (including harassment, sexual misconduct and domestic abuse), regardless of their sex, gender, sexual orientation, relationship status, age, disability, faith, ethnicity, nationality and economic status. It is also understood that incidents of unacceptable interpersonal behaviour may occur alongside other forms of harassment and discrimination.

18.2 CEG is committed to providing individualised support to any member of our community however they choose to identify, both within the centre and in terms of signposting to appropriate external agencies. All formal reports will be dealt with in a supportive, professional and respectful manner.

18.3 CEG will consider the need for diversity when appointing Investigating Officers and panel members and, where appropriate and possible, will take protected characteristics into account.

18.4 All staff involved in the process will have received equality, diversity and inclusion training and will be reminded of the need to adopt an anti-racist approach and take steps to avoid any unconscious bias or other stereotypical and false beliefs around unacceptable behaviours.

19. Confidentiality and Information Sharing

19.1 CEG understands the need for discretion, sensitivity and privacy where students have shared their experience or reported an incident of unacceptable interpersonal behaviour, including

harassment, sexual misconduct or domestic abuse. Information will be shared on a confidential, need-to-know basis in line with the CEG Privacy Notice and applicable Data Protection Laws.

19.2 This will include sharing details of the allegation with the Responding Person so that they are able to respond in line with the principles of natural justice and sharing details of the outcome with Reporting Person in the interests of their safety, health and wellbeing.

19.3 Where information is shared, this will be limited to what is necessary and proportionate for the purposes of conducting a proper investigation and disciplinary process, and information that the responding person does not need to be made aware of will be redacted, including information about the Reporting Person's past or personal wellbeing.

19.4 All individuals involved in this process should respect the sensitive nature of the process and not discuss or share details of the case outside of the investigation or disciplinary meetings. This is because sharing information could make an already difficult situation worse for everyone involved, and in some cases may undermine the disciplinary process. This does not mean that those involved cannot seek appropriate advice and support.

19.5 We will not normally report details of an incident to the police or any other external authority without the Reporting Person's permission. However, in exceptional circumstances, CEG may pass information to the relevant external authority, where there is believed to be a risk to the Reporting Person or to others, or in order to safeguard members of the CEG community or to comply with the law.

19.6 All personal information collected during this process will be processed in line with data protection legislation and kept securely and retained in line with the CEG Record Retention Schedule.

APPENDIX B: Reporting a Concern Form (online and paper copies available)

Reporting a Concern

At OnCampus, your wellbeing and safety are our top priorities. We understand that sometimes you or someone you know may need support, whether due to a personal issue, safety concern, or something that just doesn't feel right.

If you are in immediate danger, call 999 (UK) or 112 (Europe).

How to report a concern

- You may choose to tell someone in person. This could be a member of your OnCampus centre Student Services team.
- You may prefer to complete the details on this form and hand or email the form to a member of your OnCampus Student Services team.
- You may prefer to report the issue on our 'Report a Concern' form: [Report a Concern | Send a Message to Our Support Team](#)

If you need any help with this form, please speak with a member of your Student Services team.

What happens next

You will be supported and helped to understand the process.

- If you inform a member of your centre Student Services team, they will get in touch with you.
- If you complete the online form, this will be logged to our central Student Services team who will review and decide on the best course of action.

Please remember support is always available for you from your centre's Student Services team.

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Your Details

1. Do you wish to remain anonymous?	Yes/No
<p>Reporting with contact details means that we can offer you direct support and updates on the incident/concern you report. Where appropriate, we can take formal action.</p> <p>If you report anonymously, this can limit the actions we are able to take. Without your name, we cannot offer you direct support or any updates on the incident or concern.</p>	
2. First name	
3. Last name	
4. Student number	
5. Date of birth	
6. Concern details	<p>Which of the following best describes the situation your report relates to (please tick):</p> <p>Mental health, including risk to self <input type="checkbox"/></p> <p>Physical health <input type="checkbox"/></p> <p>Safeguarding <input type="checkbox"/></p> <p>Bullying <input type="checkbox"/></p> <p>Harassment <input type="checkbox"/></p> <p>Sexual or domestic abuse <input type="checkbox"/></p> <p>Discrimination <input type="checkbox"/></p> <p>Other <input type="checkbox"/></p>
7. Please include the details here	

Please remember you can always access support from your centre Student Services team.

Signed: _____

Date: _____

APPENDIX C: Support Agencies and Helplines - Sexual Harassment

Emergency Services Contact Details:

Amsterdam: general police number for non-urgent cases would be 0900 – 8844 (from The Netherlands). From outside NL it is 0031 34 357 8844

Ireland: Emergency Services 999/112; Tralee Garda Station 00353667102300; 00353864085963

Paris: Dial 112

UK: usually 101 for Police. If, however, it is felt there is an immediate risk to the student from the information held, the police should be contacted using the emergency number 999

Local Support:

Amsterdam:

- Police – emergency number: 112, non-emergency (to make an appointment or in case of questions): 0900-8844
- Comprehensive website with various information and contact list: <https://findahelpline.com/nl/topics/sexual-abuse>
- Sexual Assault Centre: <https://centrumseksueelgeweld.nl/csg-en/> or call 0800-0188
- Victim Support Netherlands: <https://www.slachtofferhulp.nl/english/> and here specifically for sexual assault info: <https://www.slachtofferhulp.nl/gebeurtenissen/seksueel-misbruik-geweld/>
- De Luisterlijn: <https://www.deluisterlijn.nl/> (24/7 free phone support helpline)
- Suicide prevention line: 113
- Fier helpline (for anyone who needs support over the phone or a chat): <https://www.fier.nl/> or call 088-2080000
- De Kindertelefoon (for those under the age of 18): <https://www.kindertelefoon.nl/> or call 0800-0432
- MIND Korrelatie (anonymous support line): <https://mindkorrelatie.nl/> or call 0900-1450
- Alles oké? (support line for young people): <https://www.allesoke.nl/> or call 0800-0450
- Emergency Crisis Centre: <https://spoedeisendepsychiatrieamsterdam.nl/welcome-to-the-spa/> or call 020-523-5433

Ireland:

Dublin Rape Crisis Centre:

- a free and confidential listening and support service for anyone who has been raped, sexually assaulted, sexually harassed or sexually abused at any time in their lives
- Freephone 24-Hour National Helpline at 1800 77 8888, at any time of day or night
- It is also possible to email to counselling@rcc.ie (note that e-mails can only be answered during office hours). For those who are deaf or hard of hearing, they provide a text service, operating Mon-Fri from 8am to 6:30pm, at 086-8238443
- A [webchat service](#) available Mon-Fri, 10am to 5pm (excluding Bank Holidays).

- If English is not the first language, they offer a [Helpline Interpreting Service](#), Mon-Fri, 8am-6:30pm, which provides live interpreting over the phone in more than 200 languages
- <https://www.drcc.ie/services/helpline/>

Kerry Rape and Sexual Abuse Centre

- **Email:** kerryrapecrisis@krsac.com
- **Helpline Freephone:** 1800 633 333

Women's Aid

- The Women's Aid 24hr National Freephone number: 1800 341 900
 - The service also supports family members, friends, and professionals who have concerns about a person, they know or are working with, who might be experiencing domestic violence and abuse
- The Helpline provides support to callers where English is not their first language, through their [Language Line facility \(available 24 hours a day, 7 days a week\)](#) and for women who are deaf or hard of hearing through its [Text Service facility \(operational daily, 8am-8pm\)](#).

Samaritans Ireland

- 24 hours a day, seven days a week, on the freephone helpline number 116 123 and email jo@samaritans.ie.
- <https://www.samaritans.org/ireland/samaritans-ireland/about/governance-and-structure/contact-us/>

Paris: <https://www.service-public.fr/particuliers/vosdroits/F1043?lang=en>

UK :

- Support for anyone who has experienced sexual abuse is available from The Sexual Assault Referral Centre (SARC) if based in the UK. They offer medical, practical, and emotional support to anyone who has been sexually assaulted or raped. They have specially trained paediatricians / Forensic Nurse Examiners (FNE) and support workers to care for affected individuals. <https://www.thesurvivorstrust.org/sarc>
- The 24-hour freephone National Domestic Abuse Helpline, run by Refuge, on 0808 2000 247
- [Talk to us on the Phone | Samaritans](#) The Samaritans are open every day of the year, you can phone them for free on 116 123 or email jo@samaritans.org (response time: 24 hours)
- <https://giveusashout.org/SHOUT> is a free, confidential, 24/7 text messaging support service for anyone who needs support
- <https://www.mind.org.uk/information-support/helplines/> Mind, the mental health charity, offers support by phone at 0300 123 3393 or online
- call NHS 111 or get help from 111 online
- the police, or dial 101
- in an emergency, dial 999
- <https://www.nhs.uk/mental-health/> NHS mental health information and support

Appendix D: The Role of a Sexual Assault Referral Centre

Across the UK there are Sexual Assault Referral Centres (SARCs). These are specialist medical and forensic services for anyone who has been raped or sexually assaulted.

The SARC is usually open 24 hours a day: you usually need to phone first or refer online.

To find your nearest SARC, visit the Survivors Trust: <https://thesurvivorstrust.org/sarc/>

A SARC offers support from a crisis worker along with forensic medical facilities and examination facilities, sexual health and contraception information, HIV medication, follow-up emotional and practical support from an Independent Sexual Violence Advisor, information about police reporting or sharing information anonymously, advice about personal safety, and information about other support services.

When visiting a SARC, you can take a friend or trusted person with you or you can visit alone.

When to visit a SARC? Any time after any sexual assault or rape. However, 7 days is usually the longest time that forensic evidence can reliably survive. After this time, no matter how long ago the incident occurred, the SARC can still help with sexual health care, counselling, advice and support (but cannot gather forensic evidence).

SARCs are for everyone, regardless of age, sexuality or gender; you will be believed and treated with dignity and respect.

If you don't want to report to the police, forensic evidence can be held for up to 24 months, with their agreement, in case you decide to report later.

APPENDIX E – Glossary of Terms

Alleged perpetrator	This language is often used by the police and criminal prosecution service to refer to the person who is alleged to have committed an act which may constitute a criminal offence. In the University, the language “responding student” will be used instead.
Assault by penetration	In UK laws the offence of “assault by penetration” exists alongside rape and sexual assault, defined as a person intentionally penetrating the vagina or anus of another person with a part of their body or anything else, without the other person’s consent. This crime has the same sentence as the crime of rape, and can be as traumatic and harmful for the victim/survivor as non-consensual penetration with a penis.
Alcohol and/or Drug Use	The law states that someone must have the freedom and capacity to make the choice to consent, which means that they can’t be unconscious/passed out, asleep or incapacitated through drugs/alcohol. Incapacitation arising from alcohol or drug consumption should be evaluated on the basis of how the alcohol/drugs have affected the individual; signs of incapacitation may include, but are not limited to, one or more of the following: slurred speech, unsteady gait, bloodshot eyes, dilated pupils, unusual behaviour, blacking out, a lack of full

	control over physical movements, a lack of awareness of circumstances or surroundings, and/or an inability to communicate effectively. Intoxication is never a defence for committing an act of sexual violence and misconduct, or for failing to obtain consent. If there is any doubt as to the level or extent of one's own or the other individual's incapacitation, the safest approach is to not engage in a sexual act.
Responding Party	means the ONCAMPUS student who is Responding in a Reported Incident(s).
Capacity to consent	Free consent cannot be given if the individual does not have the capacity to give consent. An individual is incapacitated when asleep, unconscious, semi-conscious, or in a state of intermittent consciousness, or any other state of unawareness that a sexual act may be occurring. Incapacitation may occur on account of a mental or developmental disability, or as the result of alcohol or drug use.
Cat-calling	When someone shouts harassing and sexually suggestive, threatening or derisive comments at another person publicly.
CLET	Central Leadership Emergency Team: case management conference to consider a report.
Coercion or Force	includes any physical or emotional harm or threat of physical or emotional harm which would reasonably place an individual in fear of immediate or future harm, with the result that the individual is compelled to engage in a sexual act.
Complaints Procedure	means the ONCAMPUS Students Complaints Policy
Complicity	is any act that knowingly helps, promotes, or encourages any form of sexual violence and misconduct by another individual.
Consent	<p>means actively agreeing to participate in a sexual activity where the individual has both the freedom and capacity to make that decision. Sexual activity without consent is rape or sexual assault. Consent cannot be assumed on the basis of previous sexual activity with someone or previously given consent, or from the absence of verbal or physical resistance. Consent should be established each time a new sexual activity takes place. In order to fully establish consent in a sexual relationship it must be:</p> <ul style="list-style-type: none"> • Freely given – consent is a choice and for consent to be present, the individual has to freely engage in the sexual act. Consent is not present when submission by an unwilling participant results from the exploitation of power, or coercion or force. • Reversible – anyone can change their mind at any point of the sexual activity. • Informed – you can only fully consent to something if you know exactly what it is you are consenting to. • Enthusiastic – sex should be enjoyable for all involved in the activity. • Specific – consenting to one thing is not an assumption that someone has consented to more.
Controlling Behaviour	A range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support,

	exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
Curative or corrective rape	This is a term used to describe a hate crime in which a person or people are raped because of their perceived sexual orientation or gender identity. The common intended consequence of the rape, as seen by the perpetrator, is to turn the person heterosexual or to enforce conformity with gender stereotypes.
Cyber-violence	Online behaviour that constitutes or leads to harm against the physical, psychological and/or emotional state of an individual or group. It includes stalking, unwanted advances, online harassment, non-consensual sharing of sexual images and non-consensual sharing of private information.
Disciplinary Procedure	means the ONCAMPUS Student Disciplinary Policy
Disclosure	means a disclosure of an Incident under this procedure.
Domestic Abuse	any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those who are, or have been, intimate partners or family members regardless of gender or sexuality. This can include, but is not limited to, psychological, physical, sexual, financial and/or emotional abuse.
Female Genital Mutilation (FGM)	A procedure where the female genitals are deliberately cut, injured or changed, and there's no medical reason for this to be done. FGM is illegal within the UK.
Freedom to consent	For consent to be present, the individual has to freely engage in a sexual act. Consent cannot be inferred from a lack of verbal or physical resistance. Consent is not present when submission by an unwilling participant results from coercion, force, threat, intimidation or the exploitation of power.
Grooming	The process an abuser uses to desensitise someone, to make them less likely to reject or report abusive behaviour. Grooming can happen when there is a power differential within a relationship, which the abuser exploits for their own gratification.
Groping	Touching another person's body without permission
IRM	means an initial review meeting to consider a report.
IO	means Investigating Officer.
LSM	means the Lead for Sexual Misconduct. This is a member of the local centre team who has received training for this purpose.
Non-consensual image sharing	An umbrella term that includes the non-consensual production of sexual photos or videos (such as "up-skirting") and the distribution of sexual photos or videos of an individual without the consent of the person in the image/video. The images/video may have been shared consensually (see "sexting").
Policy	means the Sexual Misconduct Policy.
Precautionary action	a measure implemented pending the outcome of a criminal and/or CEG investigation, as a neutral act in order to protect members of the OnCampus community, protect others, or ensure that evidence related to the case is not prejudiced. The decision to take precautionary is not an indicator of any pre-determination.

Procedure	means this Sexual Misconduct Procedure.
Rape	is a criminal offence, which involves the penetration of the vagina, anus or mouth, by a penis, without consent. Anyone can be raped, but rape can only be committed by someone with a penis.
Report	means a formal report of a Reported Incident(s) which is taken forward as a formal investigation by the ONCAMPUS Student Cases Team.
Reported Incident(s)	means an incident of Sexual Misconduct
Reporting Party	means the party who reports a Reported Incident(s). IT is usually the person(s) who has been the subject of the alleged incident
Responding Party	the person(s) whose behaviour it is alleged amounted to an incident of harassment, sexual misconduct or other policy breach
Retaliation	may constitute any words or actions, including intimidation, threats, or coercion, made in response to disclosures or reports of sexual violence and misconduct, by any individual including both the Reported Party and the Reporting Party, as well as witnesses, friends, or relatives.
Revenge Porn	See 'Non-consensual image sharing'
SARC	means a Sexual Assault Referral Centre, an external organisation which provides independent support and advice on incidents of sexual misconduct.
Sexting	Sending someone explicit photographs, videos or messages via mobile phone or online platform (when sent consensually, this is not considered sexual misconduct and harassment, however see "Non-consensual image sharing").
Sexual Assault	a criminal offence, which can be committed by anyone and requires touching without consent where the touching is sexual.
Sexual Assault by Penetration	an offence and can be committed by anyone; it involves the penetration of the vagina or anus by a body part (such as fingers or tongue) or anything else (such as a bottle or sex toy) without consent.
Sexual exploitation	Actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes including but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
Sexual Harassment	unwanted and unwelcomed words, conduct or behaviour of a sexual nature that has the purpose of creating an intimidating, embarrassing, hostile, degrading, humiliating or offensive environment for the recipient. It is a misuse of personal or institutional power and often based on a person's gender, although it is rarely about sexual desire. For the purpose of this policy, whether the harasser intended to be offensive or not is irrelevant and it is up to the recipient to decide the limit of acceptable behaviour as described by this policy. Sexual harassment can range from being obviously offensive to anyone, to subtler behaviour that is less obvious to any parties involved. Sexual harassment can include but is not limited to

	catcalling, following, making unnecessary and unwanted physical contact, sexual jokes and comments, giving unwelcome personal gifts, wolf-whistling, leering, derogatory comments, unwelcome comments about a person's body or clothing, asking unwelcome questions about a person's sex life and/or sexuality, engaging in unwelcome sexual propositions, invitations and flirtation, making somebody feel uncomfortable through displaying or sharing sexual material. Sexual harassment can occur in person, via email, visual images, social media, text messages, telephone and image based sexual abuse such as revenge porn and 'upskirting'.
Sexual Misconduct	means any acts, behaviours, or conduct which amount to sexual misconduct, examples of which are set out at paragraphs 13.3 and 13.4 of this Procedure. Sexual misconduct can include harassment, assault, grooming, bullying, sexual invitations, comments and non-verbal communication with sexual content or overtones, creation of uncomfortable atmospheres and promised resources in exchange for sexual access. Sexual misconduct may involve a dynamic of power imbalance and can raise issues of unequal relationships, consent, the prevention of equal access to education, opportunities and career progression. This is not intended to be an exhaustive list.
Sexual Violence	is any behaviour of a sexual nature, that is unwanted and takes place without consent or understanding. It is an umbrella term used to refer to and include the different sexual offences including, but not limited to: rape, sexual assault, child sexual abuse, sexual harassment, coercion, gaslighting, rape and assault within marriage/relationships, female genital mutilation, trafficking and sexual exploitation, forced marriage and so called honour based violence and abuse, which can also be forms of domestic abuse. Sexual violence can be psychological and/or physical.
Student	means any student formally registered on a programme of study with ONCAMPUS
Supporter	means a person who is there to provide moral support, to support a student in preparing for the meeting, and to support the student with asking and answering questions during the meeting. A student is expected to speak on their own behalf, there is no automatic right for a supporter to speak on a student's behalf, and it is at the IO's discretion as to whether a supporter is permitted to address a meeting. Should a supporter act outside those actions described, the IO will suspend the meeting and ask the supporter to leave; in the event that the student is unable to continue the meeting without their supporter being present, the meeting will continue in the student's absence based on any documentation provided and any verbal representations received up to that point.
Vexatious Reporting	involves the creation of persistent, unwarranted reports of sexual violence and misconduct, or a refusal to accept any

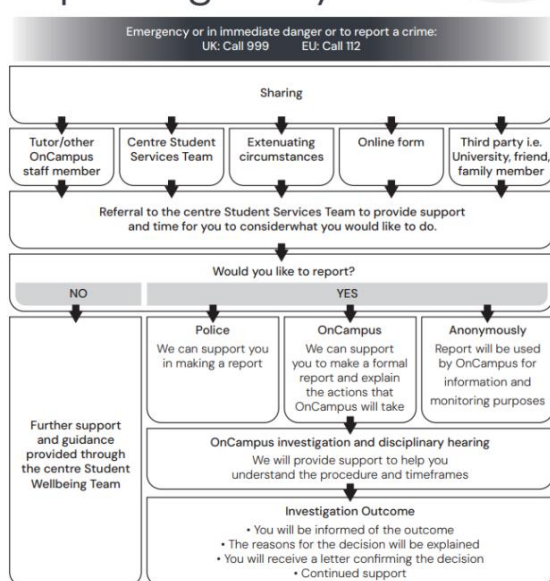
	reasonable decisions arising from the application of the accompanying procedure to this Policy.
Victim	Someone who has experienced harassment, sexual misconduct
Victim-blaming	Blaming the occurrence of sexual assault on the survivor instead of the person who committed the sexual assault. Victim blaming can be very implicit. For example, recommending that one does not wear revealing clothing, travel alone at night, or engage in sexting implies that such actions provoke sexual assault. A non-victim blaming response acknowledges that people make choices to violate the bodily integrity of others, and that they alone are responsible for these choices.
Malicious Reporting	occurs when an individual makes allegations of sexual violence and misconduct which they know to lack a basis in fact.

Appendix F:



Harassment and Sexual Misconduct Student Flowchart:

Reporting Party



Harassment and Sexual Misconduct Student Flowchart:

Responding Party

