

Sotheby's INSTITUTE OF ART

HARASSMENT, BULLYING AND SEXUAL MISCONDUCT POLICY AND PROCEDURE

This procedure is applicable to all SIA - London students registered with the University of Manchester

Introduction, Purpose and Scope

1. This policy has been drafted in accordance with the OfS condition of registration around harassment and sexual misconduct (E6)¹, UUK's Guidance for Higher Education Institutions on How to Handle Alleged Student Misconduct Which May Also Constitute a Criminal Offence², the OIA's Good Practice Frameworks for Handling Student Complaints and Academic Appeals³, and for Disciplinary Procedures⁴, and has been informed by good practice from across the sector.
2. This policy shall apply to all students registered for a higher education programme of study at Sotheby's Institute of Art – London (SIAL), irrespective of their mode or level of study.
3. This policy also applies to staff (i.e. employees and workers) of SIAL. Allegations regarding behaviour on the part of staff that may constitute a potential breach of this policy may be raised by any individual under these procedures, and referred to the relevant HR process as necessary.
4. SIAL therefore expects all students and staff to read and be familiar with this policy, and maintain good conduct at all times whilst on SIAL premises, or engaged in any programme-related activities, including whilst on study visits and field trips. These rules apply during and outside term-time, throughout the whole of the student's registration at SIAL.
5. This policy is designed to cover alleged misconduct which may have occurred on SIAL property, off SIAL property, via SIAL IT systems, and online, whether via email, the internet, or social media.
6. SIAL will not tolerate any form of discrimination, harassment, bullying, sexual misconduct or victimisation against students, faculty, staff or authorised visitors to SIAL. Such unacceptable behaviour is contrary to the Equality Act 2010⁵.

¹ <https://www.officeforstudents.org.uk/for-providers/student-protection-and-support/harassment-and-sexual-misconduct/condition-e6-harassment-and-sexual-misconduct/>

² <https://www.universitiesuk.ac.uk/topics/equality-diversity-and-inclusion/guidance-higher-education-institutions>

³ <https://www.oiahe.org.uk/resources-and-publications/good-practice-framework/handling-complaints-and-academic-appeals/>

⁴ <https://www.oiahe.org.uk/resources-and-publications/good-practice-framework/disciplinary-procedures/>

⁵ Equality Act 2010 <http://www.legislation.gov.uk/ukpga/2010/15/contents>

7. Harassment and bullying can have a serious detrimental effect on people's health, their confidence, morale and well-being and SIAL is committed to providing a positive study experience for all its students.
8. All students and staff have a right to complain if they believe that they are being, or have been, subjected to unacceptable behaviour whilst studying at SIAL, either in person or remotely.
9. Below is a list of other policies which are allied with this policy and are accessible on our website and on Canvas; these may as required apply alongside this policy, supersede or instigate this policy:
 - Staff and Student Personal Relationships Policy
 - Non-Academic Misconduct Policy
 - Student Code of Conduct
 - Student Complaints Procedure
 - Safeguarding Policy
 - Freedom of Speech Code of Practice
 - Fitness to Study Policy
 - Student Equality Diversity and Inclusion Policy

Definitions and examples of breaches of this policy

10. Where a student or a staff member engages in unacceptable behaviour of a sexual, harassing or related nature, this may be deemed a breach of this policy. Such a breach may constitute misconduct, and students may therefore be referred into the Non-Academic Misconduct Policy as deemed appropriate by the Preliminary Enquiry Officer. Staff would be referred to the relevant HR process as necessary.
11. Students and staff are expected to consider their own behaviour and the impact it can have on others. Harassment, bullying and sexual misconduct can take place in a number of ways – including, but not limited to, face-to-face encounters, online, email and written communications.
12. Harassment, bullying, sexual misconduct and related behaviours can range from obvious forms of intimidating behaviour, such as physical violence or shouting, to more subtle forms that can be difficult to identify. If an action or behaviour could reasonably have been expected to cause offence, then it is likely that harassment, bullying or sexual misconduct has occurred.
13. Examples of harassment, bullying and sexual misconduct include:
 - unwanted physical contact, sexual advances, sexual coercion;
 - violence or the threat of violence;
 - disparaging, ridiculing or insulting comments, jokes and gossip;
 - coercion, control and threats;
 - offensive gestures, posters or graffiti;
 - isolation, non-cooperation, exclusion from social events or activities;
 - personal intrusion from pestering, spying and stalking
 - failure to safeguard confidential information;
 - setting impossible deadlines, persistent unwarranted criticism.

Harassment

14. Harassment (as defined by Part 2 Section 2 of the Equality Act 2010)⁶ includes 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:
 - Disability
 - Race
 - Age
 - Religion and belief
 - Sexual Orientation
 - Sex
 - Gender Identity
 - Marriage and civil partnership
 - Pregnancy or maternity (where interpreted as discrimination)
15. Under the above definition, we also understand harassment to include domestic violence and abuse (which can also involve control, coercion, threats), and stalking.
16. Harassment may consist of persistent behaviour, although one single act may be considered sufficiently serious to warrant formal or informal reporting.
17. A person can make a complaint if they experience harassment because they are perceived by others to have a characteristic which they do not actually have, or because they are linked with a person who has a protected characteristic.
18. Threatening to expose someone as a member of a protected group is also a form of harassment, e.g. revealing someone being LGBTQ+, or having a long-term health condition, etc. The disclosure, against their wishes, of someone's gender history is a violation of the Gender Recognition Act⁷.

Bullying

19. Bullying is unwanted physical, verbal or non-verbal conduct which may intentionally or unintentionally violate a person's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment which interferes with an individual's learning, working or social environment. It is persistent, offensive, intimidating, malicious, humiliating or insulting behaviour – often associated with the misuse of power or position which aims to undermine the confidence and self-esteem of the recipient. Some examples of bullying include:
 - Verbal and/or physical intimidation;
 - Ignoring, patronising or ostracising;
 - Setting arbitrary or unachievable workloads in an unreasonable manner, and making threats associated with failure to achieve;
 - Excessive supervision
 - Public reprimand, ridicule, sarcasm or humiliation

⁶ Equality Act 2010 Part 2 Chapter 2 <https://www.legislation.gov.uk/ukpga/2010/15/section/26/enacted>

⁷ Gender Recognition Act 2004, Section 22 <http://www.legislation.gov.uk/ukpga/2004/7/contents>

- Posting offensive comments on social networking sites or in other media;
- Sending offensive text messages, or emails;
- Intentionally blocking a person's training, learning or development opportunities.
- Threatening to expose someone as a member of a protected group

Sexual Misconduct

20. Sexual misconduct is defined as any unwanted conduct of a sexual nature which occurred in person or by letter, telephone, text, email or other electronic and/or social media and includes, but is not limited to, the following behaviour:
- Engaging, or attempting to engage in a sexual act with another individual without consent (including rape);
 - Sexually touching another person without their consent;
 - Conduct of a sexual nature which creates (or could create) an intimidating, hostile, degrading, humiliating, or offensive environment for others including making unwanted remarks of a sexual nature;
 - Inappropriately showing sexual organs to another person;
 - Repeatedly following another person without good reason;
 - Distributing private and personal explicit images or video footage of an individual without their consent.
 - Arranging or participating in events which may reasonably be assumed to cause degradation and humiliation to those who have experienced sexual violence, for example inappropriately themed social events or initiations.
 - Exploiting a position of authority to coerce someone into sexual activity.
21. Additionally, under this policy, the SIAL defines **consent** as the agreement by choice to participate in an act (including, but not limited to, a sexual act) where the individual has both the freedom and capacity to make that decision.

Victimisation

22. Victimisation occurs when someone is treated badly because they have made a complaint about discrimination or harassment, or because an individual thinks that they are doing or may do these things.
23. Some examples of victimisation include:
- Excluding someone from social situations following a complaint, or rumour;
 - Denying someone the opportunity to participate in a project, social event or apply for a placement opportunity because they are perceived to be a 'troublemaker';
 - Lowering a student's assessment results because they have made or supported a complaint.

For other definitions that are used in this and other related policies, please see Appendix 1: Definitions.

Roles and Responsibilities

24. SIAL is committed to preventing incidents of bullying, harassment or sexual misconduct (including sexual harassment) where reasonably possible, and to provide

educational and preventative training programs regarding such behaviours. SIAL also commits to make available timely support for those who have been affected by such behaviours, and to provide prompt and equitable methods of investigation and resolution to stop bullying, harassment and sexual misconduct, to remedy any harm, and to prevent its recurrence.

25. All staff and students have a responsibility to ensure a working and studying environment where everyone is treated with equal respect and dignity. Each member of staff and each student is expected to contribute to preventing unacceptable behaviours, including harassment, bullying or sexual misconduct (including sexual harassment) through self-awareness; and by modelling positive behaviour for others, and raising any concerns.
26. SIAL staff are in a position of trust. It is important that exemplary behaviour is demonstrated. It must be remembered that actions can be misinterpreted by others, no matter how well intentioned. Due consideration should always be given as to what is an appropriate environment and what is appropriate conduct in relation to the activities which are being undertaken.

Measures to help stop harassment, bullying, sexual misconduct and victimisation

27. SIAL students, faculty and staff have a responsibility to help create and maintain a working and learning environment free of harassment, bullying, sexual misconduct, victimization and other related behaviours. You can help to do this by:
 - always treating your fellow students and colleagues with dignity and respect;
 - taking a stand if you think inappropriate jokes or comments are being made;
 - being clear with others when you find their behaviour to be unacceptable;
 - being conscious about your own behaviour and how it might affect other people;
 - intervening, if possible, to stop harassment, bullying, sexual misconduct and victimisation and providing support to recipients;
 - making it clear that you find harassment, bullying, sexual misconduct and victimisation unacceptable;
 - reporting harassment, bullying, sexual misconduct and victimisation to Institute faculty and staff members and supporting SIAL in the investigation of complaints; and
 - if a complaint of harassment, bullying or sexual misconduct is made, not prejudging or victimising the complainant or alleged harasser.

Staff and student personal relationships

28. SIAL prohibits all intimate personal relationships between all SIAL staff and all higher education students. There is the potential for abuse in such relationships where individuals are in inherently unequal positions. Due to the potential for conflict of interest, exploitation, favouritism or bias, such relationships may undermine the integrity of student and staff work, or may have adverse effects on the working and learning environment for those directly involved, as well as for the broader institutional culture.
29. An exception to this is where there is a pre-existing intimate personal and/or family

relationship (family including relationships by marriage). These are permitted and are subject to a case-by-case risk assessment to determine whether any potential or actual conflict of interest exists, on the basis of which preventive measures may be put in place. Staff have an obligation to disclose such relationships.

30. Students on a placement in an external organisation must adhere to any policies on personal relationships within the external organisation. In the absence of a policy in the external organisation students must continue to follow this policy and should not enter into close personal and intimate relationships with their placement supervisors.
31. For further details about SIAL's approach to managing staff-student relationships, please see Policy on Intimate Personal Relationships between Staff and Students, available both on Canvas and on our [website](#).

Data processing, confidentiality and record keeping

32. It is essential for all of those involved in informal and formal complaints procedures to maintain appropriate confidentiality, as cases relating to harassment, bullying, sexual misconduct and victimisation may be of an extremely sensitive nature. However, if a student names another member of SIAL and wishes SIAL to take action, then the person(s) named will normally have the right to know the complaint made against them, including the name of the reporting party, in order to be able to reply to the complaint. If the reporting party refuses to name a person who is relevant to their complaint, SIAL may not be able to consider or investigate the case, or may only be able to consider or investigate it to a limited extent.
33. Once an individual has raised allegations or a complaint that falls within the scope of this policy, records will be held confidentially and only strictly as necessary on the relevant student files. In accordance with the SIAL duties under the General Data Protection Regulation⁸ and the Data Protection Act 2018⁹ and in keeping with OIA recommendations, records will be retained for a minimum of 15 months and for no longer than is reasonably necessary (i.e. no longer than 6 years after the final action on the student's case, at which point the individual student file will be destroyed). Some deviation from this schedule can be expected for cases which, in the judgement of SIAL, are unique or complex and therefore require shorter or longer record retention periods.
34. As part of the fair and proper management of action under this policy, personal, 'special category' data and criminal records data may be shared as necessary, in order to investigate and resolve matters. All such information will be treated confidentially, and will be disclosed only to those individuals who need to see such data for the purposes of undertaking an investigation, determining or recommending a resolution, or deciding what other appropriate steps can be taken. In raising a formal complaint/allegation under this policy, individuals will be asked to indicate that they consent to their data being shared appropriately.
35. Any individuals involved in any part of the process – either in relation to those seeking

⁸ <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

⁹ <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

support or those submitting a complaint – must keep information that is disclosed to them confidential. Any unauthorised disclosure of confidential information will be considered a policy violation and will be addressed accordingly.

36. Where an individual submits evidence in support of complaints or allegations raised that fall within the scope of this policy, and that evidence constitutes third party personal information, the Preliminary Enquiry Officer will need to notify the third party that their data is being processed, in accordance with Article 14 of the GDPR¹⁰.

Raising a complaint or allegations

37. A student may choose whether to raise a complaint or make allegations regarding sexual misconduct, harassment or related behaviours in the following ways:
- by approaching a staff member of SIAL and raising allegations verbally, by contacting them in writing, or by completing the Disclosure of Misconduct Form (Appendix 2).
 - by completing a report form online, accessible via [this link](#); this option allows for complaints and/or allegations to be raised anonymously.
38. If a staff member would like to raise a concern, they can do it via their line manager, a more senior manager, or Human Resources.
39. If the matter proceeds formally, the reported behaviour of a student will be investigated under the Student Non-Academic Misconduct Policy, and the reported behaviour of a member of staff will be investigated under relevant HR procedures.

Anonymous Disclosure

40. SIAL will evaluate whether to investigate anonymous reports on a case-by-case basis. If such cases are investigated, it must be recognised that anonymous disclosure will inevitably limit both the scope of any investigation and also the scope of any subsequent outcome.

Informal Resolution

41. It may be appropriate to use a Local Informal Resolution in order to resolve concerns swiftly and effectively at the point at which a concern is raised, or as close to that point as possible; SIAL aims to address any informal concerns raised within 3 working days.
42. Students should raise any concerns immediately and there are a number of individuals they might approach, including their Programme Director, Head of Counselling and Student Support, or the Registrar, with the aim of resolving the issue directly and informally. If the concern is about the Head of Counselling and Student Support, the

¹⁰ <https://www.privacy-regulation.eu/en/article-14-information-to-be-provided-where-personal-data-have-not-been-obtained-from-the-data-subject-GDPR.htm>

Registrar should be contacted. If the complaint relates to a member of faculty or staff, students may approach the Head of Human Resources. In order to raise a concern, students may choose to use the Disclosure of Misconduct Form (see Appendix 2).

43. If a student, or a member of staff is approached and told that their behaviour could be construed as bullying, harassment or sexual misconduct, they should be prepared to listen patiently and calmly. Whilst it may be upsetting, they should allow the student or colleague to express their concerns, and if appropriate, try to reach common ground to remedy the situation and allow a positive working/learning relationship to be resumed. If the nature of the complaint is serious or inappropriate, the student or staff member should speak with their line manager or supervisor to agree the next steps.
44. Where a student concern has been resolved locally, the member(s) of faculty or staff involved will communicate the resolution to the student. For concerns raised by staff members, it will be their line manager.

Formal Procedure

45. Where it has not been possible to resolve matters to the student's satisfaction, or where cases are too serious to consider within the Local Resolution Stage, they will be referred to the Director's Office. The Director (or his / her Deputy) will consider whether an investigation is to be commissioned under the Non-Academic Misconduct Policy and Procedure. The Director will determine who will be the Preliminary Enquiry Officer. Where the responding party is a member of staff, HR policy will apply instead.
46. Where an allegation is against a member of faculty or staff, Human Resources will be involved at all stages of the process. If the allegation is against the Director, it should be referred to the Governing Body via the Clerk of the Governing Body.
47. The Formal Procedure will normally be adopted where the allegation is serious, or if it continues after the Local Resolution Stage has been used.
48. Throughout the Formal Procedure Stage the Registrar will ensure that all meetings are documented.
49. Any members of staff responsible for receiving information about, investigating, or taking decisions on, matters relating to incidents of harassment and/or sexual misconduct will be appropriately trained by specialist external training providers who are experts in equipping higher education institutions to safeguard, and prevent and respond effectively to sexual violence, harassment and abuse.

Outcome of a Formal Student Complaint/ Disciplinary Case

50. As part of the Preliminary Enquiry stage under the Non-Academic Misconduct Policy, the reporting party will have been consulted on what action they would prefer to be taken. However, whilst every endeavour will be made to adhere to the wishes of the reporting party, the decision as to what action may be taken rests with the Preliminary Enquiry Officer.

51. The information that the Preliminary Enquiry Officer can give regarding their reasons for the Preliminary Enquiry stage outcome must be in accordance with the lawful processing of personal data under the Data Protection Act 2018 and General Data Protection Regulation (EU) 2016/679, taking account of the rights of both the reporting and responding party, and therefore it may not be possible to divulge all the details of the reasons for the decision.
52. At the conclusion of the Preliminary Enquiry stage, the reporting party will normally be informed of the following:
- the decision of the Preliminary Enquiry Officer, which will depend on the circumstances of each case and take account of the wishes of the reporting party as far as possible;
 - any action taken that directly impacts the reporting party;
 - where it is proportionate and reasonable to release this information, whether any precautionary measures have been taken;
 - whether the matter has been referred into another internal procedure.
53. Where a case has been referred externally to the police either directly by the reporting party or by the SIAL under its duty of care obligations, the reporting party will be kept informed in accordance with advice and instructions received from the police.
54. At the conclusion of the Preliminary Enquiry stage, the responding party will normally be informed of the following:
- the decision of the Preliminary Enquiry Officer, which will depend on the circumstances of each case and take account of the wishes of the reporting party as far as possible;
 - any action taken that directly impacts the responding party;
 - whether the matter has been referred into another internal procedure.
55. Responding party will be informed about what information will be given to the reporting party in relation to any details of action taken, and the reasons for providing that information to the responding party will be explained.
56. Should the case progress to further stages of the Non-Academic Misconduct Policy, similar information will be shared following the conclusion of each stage, in line with the policy.

Police Investigations and Judicial Proceedings

57. Where criminal investigations and/or judicial proceedings are ongoing, or are likely to commence in respect of a disclosure or report, SIAL will usually continue its own investigation and any disciplinary action, subject to the circumstances of the case and police advice.
58. Where, following police advice or otherwise, SIAL decides not to undertake its own investigation until the case has concluded, SIAL reserves the right to review this decision and to initiate its own investigation and/or disciplinary action at a later stage in or on completion of the criminal investigation and/or judicial proceedings.
59. A decision by the Police or Crown Prosecution Service (or other law enforcement

agency) to take no further action in relation to a criminal matter, or an acquittal at a trial, does not preclude or negate the outcome of SIAL's investigation and/or disciplinary action.

60. An internal investigation is focused exclusively on whether a breach of the Bullying, Harassment and Sexual Misconduct policy and/or other applicable obligations or policies has occurred. The internal process may therefore be considering different issues from a police investigation or criminal prosecution. This is why it may, depending on the circumstances, be possible to proceed with an internal investigation at the same time as a criminal process. Any judgements reached as part of an internal investigation do not constitute a legal ruling on whether or not criminal activity has taken place.
61. Where a student or staff member is convicted of a criminal offence or accepts a police caution in relation to behaviour that falls within the scope of this policy, they must declare this to SIAL. The conviction/caution will be taken as conclusive evidence that the behaviour took place, and no further investigation shall be required by SIAL. Appropriate disciplinary measures may be taken (if they have not already).

Interim Measures

62. Following a report, or a disclosure that requires an investigation the SIAL may determine it necessary to introduce interim measures. An Interim Measures Panel (IMP) may assess support needs, consider how to protect the interests of all parties and members of the SIAL community who may be impacted by the case, and agree to next steps. This will be achieved through a robust risk assessment to consider the academic, welfare and support needs of the parties, and any interim measures necessary to ensure a fair and transparent investigation, where appropriate.
63. Any interim measures will be proportionate to the nature of the risk(s) being managed. Interim measures may include alternative working arrangements, provision of support, or a recommendation to partially or fully suspend an employee or student during this time and will be recommended by the panel in accordance with SIAL's policies and procedures.
64. The Chair of the Interim Measures Panel will be Institute Director, or their Deputy.
65. The composition of the Interim Measures Panel will depend on the nature of the allegations and the parties involved, e.g. between students, or between a student and a staff member. There will be four members, including the Chair, and it will comprise of:
 - A member of the Safeguarding Team
 - A senior academic from a trained pool
 - A representative of the Quality Team
 - Institute Director, or their Deputy (Chair)
66. The Chair of the panel will ensure that members have received appropriate training and that where possible, the panel is diverse and reflects any relevant protected characteristics.
67. The membership of the panel will be shared with the reporting party in advance of the meeting to ensure transparency and to manage any conflicts of interest.

- 68. The risk assessment and any interim measures that are put in place will be shared to both parties and will be reviewed regularly by the IMP and amended as appropriate.
- 69. All information disclosed as part of this process will be treated confidentially and sensitively and in accordance with data protection legislation.

False, Bad Faith or Misleading Allegations

- 70. Complaints of harassment, bullying, sexual misconduct and victimisation are taken extremely seriously by SIAL. If it is discovered that the reporting party has made a false, malicious or mischievous complaint, they will be dealt with in accordance with SIAL's Non-Academic Misconduct Policy, or relevant HR procedures.

Right to withdraw a complaint/allegations

- 71. Where the reporting party expresses that they do not wish to engage with the procedures under this policy or another SIAL procedure, they are under no obligation to engage with any such procedures. The reporting party also has the right at any point in proceedings to change their mind about whether or not they prefer any action to be taken. As far as possible, SIAL will proceed in accordance with the wishes of the reporting party; however, there may be circumstances where reporting party wishes no action to be taken, but SIAL has an obligation to pursue action (e.g. in the event of serious safeguarding concerns and/or risks). The decision therefore as to whether any action should be initially taken or should continue rests with SIAL, and action may proceed or continue to proceed without the engagement of the reporting party.
- 72. The reporting party may withdraw a complaint or allegations at any time whilst procedures have begun either under this policy or another policy (e.g. the Non-Academic Misconduct Policy), by notifying the appointed officer of SIAL who is operating the relevant stage of the procedure, in writing, of their decision. They do not have to provide any reason(s) for a decision to withdraw a complaint or allegations.

Use of Non-Disclosure Agreements (NDAs)

- 73. SIAL does not and will not use Non-Disclosure Agreements (NDAs) to prevent the investigation of complaints of sexual misconduct or other inappropriate behaviour, or to prevent responsible whistleblowing. It is fundamental to the wellbeing of our community and those who study and work in it that we do all that we can to promote the health and wellbeing of our students and staff, and to encourage the reporting of all forms of sexual misconduct and other inappropriate behaviour.

Freedom of Speech

- 74. SIAL is committed to the principles of academic freedom, freedom of speech, and expression. It fosters an environment where all its students and staff can participate

fully in the life of their school, and where everyone feels confident and able to research, question and test received wisdom, and to express new ideas and controversial or unpopular opinions, without fear of isolation, marginalisation or discrimination. SIAL believes that all staff and students should have the right to speak freely, without fear of disciplinary action or any other sanction, provided they do so lawfully, without malice and in the public interest.

75. With this in mind, we believe 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 their course, are unlikely to constitute harassment.

Advice and Support

76. SIAL is committed to providing support for members of its community affected by these issues. If you believe that you are being harassed, there are a number of options to consider. Each case will be different and is dependent on the individual person's circumstances. Students are advised to seek advice from a member of faculty or staff at SIAL, or a member of the Student Support team. You are advised to act promptly and should not feel the unwanted behaviour is your fault, or that you have to wait until the situation is intolerable. The Student Support team can be contacted via email at: student.support@sia.edu; you can also email the Registrar at j.mills-foy@sia.edu
77. Information about available support is also outlined in Appendix 3, which lists external support providers, as well as Appendix 4, with guidance for students and staff on what to do following a rape or sexual assault. Support resources are available to any member of SIAL who discloses an incident, regardless of whether they choose to make a report to SIAL and/or police. Staff at SIAL who receive a report or disclosure should direct the reporting party to the support available. SIAL will also offer individual support measures as appropriate to both the reporting and responding parties, whether internally or externally, and witnesses involved in formal complaints.
78. All employees can seek confidential support and advice from HR should they be experiencing or witnessing any sexual misconduct and/or sexual harassment in the workplace or have concerns about a colleague who is. HR can advise on potential next steps and signpost to options for emotional and practical support as needed. Confidential counselling is available to all employees through BrandEd's Employee Assistance Programme (EAP) helpline, provided by Health Assured.

Review of Policy and reporting to the Governing Body

79. This policy will be reviewed at regular intervals, and its effectiveness will be monitored and any changes which are identified as needed will be implemented. This policy is not contractual and may be varied from time to time.
80. An annual report will be submitted to SIAL's Governing Body, detailing the number of cases that have been addressed under this policy and the nature of any resolution or disciplinary outcome.

Title	Harassment, Bullying and Sexual Misconduct Policy and Procedure
Date first implemented	2020
Approving body	Governing Body
Version	June 2025
Effective	1 August 2025
Supersedes	September 2022
Next review date	Summer 2026
Frequency of review	Annually
Policy owner	Quality Team

Appendix 1: Definitions

Abuse of power

A situation where someone uses their position of power or authority in an unacceptable manner. Abuse of power can take various forms and may include, but is not limited to, grooming, manipulation, coercion, putting pressure on others to engage in conduct they do not feel comfortable with.

Adult at risk

An adult at risk is someone over the age of 18 who receives or may need community care services by reason of disability or illness and as a result of those needs is unable to protect himself or herself against significant harm or exploitation. This can relate to physical, mental or psychological wellbeing or the potential to be drawn into sexual or criminal exploitation and activity.

Bullying

Bullying is unwanted physical, verbal or non-verbal conduct which may intentionally or unintentionally violate a person's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment which interferes with an individual's learning, working or social environment. It is persistent, offensive, intimidating, malicious, humiliating or insulting behaviour – often associated with the misuse of power or position which aims to undermine the confidence and self-esteem of the recipient.

Consent

Consent is agreeing by choice and having the freedom and capacity to make that choice. The person seeking consent should always take steps to ensure that consent is freely given, that it is informed and recognises that it can be withdrawn at any time.

Freedom to consent: a person is free to make a choice if nothing negative would happen to them if they said no. For example, a person may not feel free to make a choice if:

- they are being threatened with violence (by the perpetrator and/or by someone else)
- they are being threatened with humiliation
- they believe that the continuation or assessment of their studies, or progression or advancement of their career, will be at risk if they refused
- they are being blackmailed
- there is a significant power imbalance and the party without power feels pressured to continue in the relationship against their will.

Capacity to consent: Capacity is about whether someone is physically and/or mentally able to make a choice and to understand the consequences of that choice. For example, a person does not have capacity to give consent if:

- they are drunk or under the influence of drugs- this means someone may still be physically able to have sex but they may not be able to consent;
- they are asleep or unconscious;

- a person may also not have capacity to give consent if they have, for example, a cognitive or learning difficulty, a disability which impairs their speech, or are experiencing a mental health crisis.

Disclosure

Disclosure, for the purposes of this policy, involves an individual choosing to tell anyone who is part of SIAL about their experience of bullying, harassment or sexual misconduct. Unlike reporting (see definition below), disclosure does not trigger an investigation or action (unless SIAL has a safeguarding obligation), but it may lead to support being offered.

Discrimination

The Equality Act 2010 states that it is against the law to treat any person unfairly or less favourably based on a protected characteristic. The 9 protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including ethnic origin, nationality and colour), religion or belief, sex and sexual orientation.

Freedom of Speech

Freedom of Speech principles means the following requirements:

- The need for SIAL to 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, including in premises and situations where educational services, events and debates take place;
- The need for SIAL to apply a rebuttable presumption to the effect that students being exposed to any of the following is unlikely to amount to harassment:
 - the content of higher education course materials, including but not limited to books, videos, sound recordings, and pictures;
 - statements made and views expressed by a person as part of teaching, research or discussions about any subject matter which is connected with the content of a higher education course.

Grooming

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

Harassment (as defined by Part 2 Section 2 of the Equality Act 2010)¹

Harassment includes 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:

- Disability
- Race

¹ Equality Act 2010 Part 2 Chapter 2 <https://www.legislation.gov.uk/ukpga/2010/15/section/26/enacted>

- Age
- Religion and belief
- Sexual Orientation
- Sex
- Gender Identity
- Marriage and civil partnership
- Pregnancy or maternity (where interpreted as discrimination)

Intimate Personal Relationship

A relationship that involves one or both of the following elements:

- physical intimacy, including isolated or repeated sexual activity; or
- romantic or emotional intimacy.

Related behaviours

Behaviours which do not specifically fall under the SIAL's definition of 'bullying', 'sexual misconduct' or 'harassment', but which are unacceptable behaviours that may constitute a breach of the Harassment, Bullying and Sexual Misconduct Policy and Procedure.

Reporting

Reporting is the sharing of information with a staff member of SIAL regarding an incident of bullying, harassment or sexual misconduct experienced by that individual for the purposes of initiating the investigation process set out in this policy and the accompanying procedure (different from *Disclosure*).

Responding Party

The Responding Party is the person(s) whose behaviour it is alleged amounted to an incident of bullying, harassment or sexual misconduct.

Reporting Party

The Reporting Party is the person(s) who witnessed or is the subject of the alleged incident of bullying, harassment or sexual misconduct.

Sexual misconduct

Any unwanted conduct of a sexual nature which occurred in person or by letter, telephone, text, email or other electronic and/or social media and includes, but is not limited to, the following behaviour:

- Engaging, or attempting to engage in a sexual act with another individual without consent (including rape);
- Sexually touching another person without their consent;
- Conduct of a sexual nature which creates (or could create) an intimidating, hostile, degrading, humiliating, or offensive environment for others including making unwanted remarks of a sexual nature;
- Inappropriately showing sexual organs to another person;
- Repeatedly following another person without good reason;
- Distributing private and personal explicit images or video footage of an individual without their consent.

- Arranging or participating in events which may reasonably be assumed to cause degradation and humiliation to those who have experienced sexual violence, for example inappropriately themed social events or initiations.
- Exploiting a position of authority to coerce someone into sexual activity.

Third-party harassment

This occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, SIAL, but with whom that person has come into contact during their employment or studies. Third-party harassment could include, for example, unwelcome sexual advances from a supplier or guest lecturer visiting SIAL's premises, or where a person is visiting a supplier's premises or other location in the course of their employment or studies.

Stalking

Following a person, watching or spying on them or forcing unwanted contact with the victim through any means, including social media. The effect of such behaviour is to curtail a victim's freedom, leaving them feeling that they constantly have to be careful. In many cases, the conduct might appear innocent (if it were to be taken in isolation), but when carried out repeatedly to amount to a course of conduct, it may then cause significant alarm, harassment or distress to the victim.

Victimisation

Victimisation occurs when someone is treated badly because they have made a complaint about discrimination or harassment, or because an individual thinks that they are doing or may do these things.

Appendix 2: Disclosure of Misconduct Form

If you would like to make an anonymous disclosure, you can do so by following [this link](#)

Section 1 – details of the person you are reporting

If you are reporting multiple people for the same incident, please fully complete each form for each person.

I am reporting:	A student <input type="checkbox"/>	A member of staff <input type="checkbox"/>
Surname/Family Name:		
First Name(s):		
Programme/ department:		

Section 2 – Incident Information

Please give full details of the incident(s) including, date, time, location.

Date:	Time:
Location:	
Details:	

Section 3 - Other witnesses

Please give details of any other witness to the incident.

Section 4 – Impact of incident

Please give brief details of any impact of the incident to those who witnessed/experienced it, if available.

Section 5 – Supporting Information

Please use this section to detail/list any information you would like to be considered alongside your statement, e.g. screenshots, emails etc. Please attach this evidence in the email with this form.

Section 6 – Your details

If you would like to make your disclosure anonymously, please follow the link at the top of the form.

I am:	A student <input type="checkbox"/> A member of staff <input type="checkbox"/> Other <input type="checkbox"/>
Surname/Family Name:	
First Name(s):	
Programme/ department:	
Email:	
Mobile number:	

Section 7 – Declaration

By signing below, you are confirming the following:

- that you believe the information set out in this form is true and correct
- that you understand that the information provided may be used as evidence if further investigation/action is required
- that you may be required to provide further evidence if a formal resolution is sought
- that you understand that the information on this form may need to be shared with faculty or staff participating with further investigation/action and, if necessary, be shared with the police for the purposes of further investigation.

Print name _____ Signature _____ Date _____

Please submit this form to one or more of those listed below, as appropriate:

- Head of Counselling and Student Support, Dawn Ashdown Harris: student.support@sia.edu
[/D.AshdownHarris@sia.edu](mailto:D.AshdownHarris@sia.edu)
- The Registrar, Joanna Mills-Foy: j.mills-foy@sia.edu
- Director of HR, Audrey Parr: a.parr@sia.edu

Appendix 3: External Support Services

If you need immediate help, call emergency services on 999

If you need urgent mental health support, call NHS 111 and select Option 2, or talk to Samaritans on 116 123

Helplines from around the world

International helplines, crisis lines, and suicide hotlines let you reach out whenever you need support, and offer a chance to discuss things you might not be ready to share face-to-face, in your own native language. They are a great way to be heard and get sound advice. Many are open 24/7 and all are free and confidential.

[International helplines 1](#)

[International helplines 2](#)

[International helplines 3](#)

On the following pages you will find details of various external organisations that provide free wide-ranging support services, covering the following areas:

- Bullying and discrimination p.2
- Domestic violence p.2
- Rape and sexual abuse p.3
- Stalking support p.5
- Cybercrime p.5

Bullying and discrimination

<u>National Bullying Helpline</u>	Information and advice for anyone dealing with bullying.	Helpline: 0300 323 0169 Telephone: 0845 225 5787 <u>help@nationalbullyinghelpline.co.uk</u>
<u>The Anti-Bullying Alliance</u>	A coalition of organisations and individuals that are united against bullying.	<u>Advice and support</u>
<u>Equality Advisory Support Service</u>	The Helpline advises and assists individuals on issues relating to equality and human rights, across England, Scotland and Wales.	Telephone: 0808 800 0082 <u>Contact form</u>
<u>Stop Hate UK</u>	Stop Hate UK is one of the leading national organisations working to challenge all forms of hate crime and discrimination, based on any aspect of an individual's identity. Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties	Telephone: 0800 1381625 Email: <u>info@stophateuk.org</u>

Domestic violence

<u>Refuge (National Domestic Abuse Helpline)</u>	Refuge is the largest specialist domestic abuse organisation in the UK. On any given day our services support thousands of survivors, helping them to overcome the physical, emotional, financial and logistical impacts of abuse and rebuild their lives.	Domestic Violence Helpline: 0808 2000 247 (24/7)
<u>Safelives</u>	Information and resources with people living with domestic abuse.	<u>Getting help and support</u>
<u>Women's Aid Federation</u>	Women's Aid is the national domestic violence charity that helps up to 250,000 women and children every year. We work to end violence against women and children, and support over 500 domestic and sexual violence services across the country.	Email: <u>helpline@womensaid.org.uk</u>
<u>Rights of Women</u>	The only charity dedicated to providing frontline legal advice to women experiencing all forms of violence in England and Wales.	<u>Advice lines</u>
<u>Woman's Trust</u>	Free counselling and support services for survivors of domestic violence and domestic abuse, as well as how to make a referral.	Telephone: 020 7034 0303 Email: <u>office@womanstrust.org.uk</u>

<u>Men's Advice Line</u>	Advice and support for men experiencing domestic violence and abuse.	Telephone: 0808 801 0327 Email: info@mensadvice.org.uk
<u>Mankind Initiative</u>	A national helpline for all men suffering from domestic abuse or violence and for their friends and family.	Telephone: 01823 334244
<u>Respect</u>	Offers information and support to men who have experienced domestic violence.	Telephone: 0808 8024040 Email (general enquiries): info@respect.org.uk
<u>Galop</u>	Galop is the UK's LGBT+ anti-abuse charity. We work with and for LGBT+ victims and survivors of abuse and violence.	Helpline: 0800 999 5428 Email: help@galop.org.uk

Rape and sexual abuse

<u>Rape Crisis UK</u>	National organisation offering support and counselling for those over the age of 16 affected by rape and sexual abuse.	Helpline: 0808 500 2222 <u>Free online chat</u>
<u>Sexual Assault Referral Centres (SARCs)</u>	Contact a local Sexual Assault Referral Centre for immediate medical and emotional support.	<u>Find a rape and sexual assault referral centre</u>
The Haven – Whitechapel SARC near to Royal London Hospital (east)	www.thehavens.org.uk The Haven is a Sexual Assault Referral Centre (SARC) in London and offers support services for women, men and children who have been raped or sexually assaulted. It is free and confidential and offers special support for young people, examinations to collect evidence of rape or sexual assault and testing for sexually transmitted infections and HIV.	Telephone: 020 3299 6900 - 24 Hours (for urgent advice/ appointments) Helpline : 020 3299 1599 (for general enquiries) Opening times: Available 24 hours, call for advice or to make an appointment.
The Haven – Paddington SARC near to St Charles Centre for Health and Wellbeing (west)		
The Haven – Camberwell near to King's College Hospital (south)		
<u>Lifecentre</u>	Support for survivors of sexual abuse and anyone supporting them, including a helpline, text support and email counselling.	Telephone: 01243 786349 Email: info@lifecentre.uk.com

<u>Victim Support</u>	Confidential and free services available to anyone who's been raped or sexually assaulted, now or in the past. They also support witnesses of crime.	Supportline: 0808 168 9111
<u>The London Survivors Gateway</u>	The London Survivors Gateway is a referrals hub of specialist sexual violence services for all survivors of sexual violence aged 13+ regardless of gender. Supports those that live, work or study in London.	Telephone: 0808 801 0860
<u>RASAC (Rape and Sexual Abuse Support Centre)</u>	Specialist South London support for women and girls who have experienced rape and/or childhood sexual abuse.	Helpline: 0808 802 9999 Email: info@rasasc.org.uk
<u>The Survivors Trust</u>	A national membership organisation supporting specialist rape and sexual abuse services in the voluntary sector. We have over 120 member organisations throughout the UK and Ireland who provide specialist support services to over 100,000 survivors each year.	Helpline: 0808 801 0818 Email: info@thesurvivorstrust.org
<u>Survivors UK – Male Rape and Sexual Abuse Support</u>	We provide a national online helpline, individual and group counselling for boys, men and non-binary people aged 13+ who have experienced sexual violence at any time in their lives.	Telephone: 0203 5983 898 Email: help@survivorsuk.org
<u>Women and Girls Network Sexual Violence Helpline</u>	A free service run by women, for women in London who have been affected by all forms of violence and abuse.	Telephone: 0808 801 0660 Email: advice@wgn.org.uk
<u>Solace Women's Aid</u>	Provides advice and support for women and children in London for domestic abuse and sexual violence.	Telephone: 0808 802 5565 Email: advice@solacewomensaid.org
<u>Women Against Rape (WAR)</u>	We provide rights information, support and advocacy. We campaign for justice, protection and compensation for all women and girls who have suffered sexual, domestic and/or racist violence. This includes survivors of any age, race and nationality, asylum seekers, women with disabilities, trans women, sex workers.	Telephone: 020 7482 2496 E-mail war@womenagainstrape.net
<u>Respond</u>	Helps children and adults with learning disabilities who have experienced abuse or trauma, as well as those who have abused others, through psychotherapy, advocacy and other support.	Telephone: 020 7383 0700
<u>SupportLine</u>	A confidential helpline offering emotional support to any individual on any issue who resides in the UK. The Helpline is primarily a preventative service and aims to support people before they reach the point of crisis.	Helpline: 01708 765200 Email: info@supportline.org.uk

Stalking support

The Suzy Lamplugh Trust (runs the National Stalking Helpline)	The UK's pioneering personal safety charity and leading stalking authority	National Stalking Helpline: 0300 636 0300
Victim Support	Confidential and free services, including stalking support.	Supportline: 0808 168 9111
Paladin Service	Paladin NSAS is a trauma-informed service established in 2013, to assist high risk victims of stalking in England and Wales.	Helpline: 020 3866 4107 Email: info@paladinservice.co.uk
Action Against Stalking	A Scottish charity supporting victims of stalking	Telephone: 0800 820 2427 Email: support@actionagainststalking.org

Cybercrime

The Cyber Helpline	Free, expert help for victims of cybercrime, digital fraud & online harm, including online bullying and harassment, cyberstalking and revenge porn.	Online chatbot
Revenge Porn Helpline	A UK service supporting adults (aged 18+) who are experiencing intimate image abuse, also known as revenge porn.	Telephone: 0345 6000 459 Email: help@revengepornhelpline.org.uk

Appendix 4: What to do following rape or sexual assault

Information for students and staff

If you have experienced sexual violence, you can access immediate information and support at the following link: <https://rapecrisis.org.uk/get-help/>

If you have experienced sexual violence, including having been sexually assaulted or raped, this guidance provides information on the things that you might want to consider to help you make an informed choice about what to do, both in the near future and perhaps later on.

Definitions

Rape is often described as unwanted, forced or non-consensual 'sex'. But sex and rape are two very different things. If there is no consent, then it's not sex, it's rape – no matter the circumstances.

The legal definition of rape in England and Wales is when someone intentionally penetrates another person's vagina, anus or mouth with their penis, without that person's consent.

The [Sexual Offences Act 2003](#) says that someone commits rape if all of the following happens:

- They intentionally penetrate the vagina, anus or mouth of another person with their penis.
- The other person does not consent to the penetration.
- They do not reasonably believe that the other person consents.

This includes if:

- The two people are married or in a relationship.
- The other person consented to one type of penetration (e.g. vaginal or oral sex), but not another (e.g. anal sex).
- Someone removes a condom without the other person's permission – or lies about putting one on. This is commonly known as '[stealthing](#)'.

Sexual assault happens when someone either touches another person in a sexual manner without consent or makes another person touch them in a sexual manner without consent. It includes unwanted kissing and the touching of someone's genitals, breasts or bottom.

The [Sexual Offences Act 2003](#) says that someone commits sexual assault if all of the following happens:

- They intentionally touch another person.
- The touching is sexual.
- The other person does not consent to the touching.
- They do not reasonably believe that the other person consents.
- The touching can be with **any part of the body** or with **anything else**.

It could include:

- Kissing.
- Touching someone's genitals, breasts or bottom – including through clothing.
- Touching any other part of the body for sexual pleasure or in a sexual manner – for example, stroking someone's thigh or rubbing their back.
- Pressing up against another person for sexual pleasure or in a sexual manner.
- The perpetrator making someone else touch them in a sexual manner.
- Touching someone's clothing if done for sexual pleasure or in a sexual manner – for example, lifting up someone's skirt.

In law, **sexual consent** is when we agree by choice, and have the **freedom** and **capacity** to make that choice.

This means that someone **doesn't** consent to sex or other sexual activity if they:

- Say 'no'.
- Seem unsure or upset, stay quiet, move away or don't respond.
- Are asleep, unconscious, drunk, drugged or on drugs.
- Are pressured, manipulated, tricked or scared into saying 'yes'.
- Are too young or vulnerable to have the freedom and capacity to make that choice.

Many of the **myths** surrounding consent and sexual violence can make victims and survivors feel as though they are somehow to blame. It can also make them feel that what happened to them wasn't 'real' sexual violence. You can read more about that [here](#).

Checklist of initial steps to consider

The following guidance has been produced for students who have experienced sexual misconduct, which includes rape. It provides information that you might want to consider when deciding about what to do next. Whilst the guidance is aimed at recent misconduct, it also includes information about sources of support which may be useful for any student who is a survivor of sexual misconduct.

If you have recently experienced sexual misconduct, you may be feeling many things. Some people report that they feel numb or shocked, confused, or frightened or fragile or angry. There is no right or wrong way to feel.

However you are feeling, remember that this is not your fault, you are not to blame, and you are not alone. You should not feel under any pressure to act in any specific way. Any decisions made will be yours alone and will be respected.

The list below provides some steps for you to consider.

1. Are you in a safe environment?

If the assault has just occurred, you might want to consider whether you feel safe where you are. If you or others feel at risk or consider the situation to be an emergency, you can call the police or an ambulance on 999.

2. Time limits to be aware of

Please remember it is your choice what support you access and if you choose to report the assault to the police. You may even choose to take some time to think about your options, and that is a perfectly valid decision. Before you make a decision regarding the support you may want or need, there are a few time limits you need to be aware of.

If you:

- suspect you were given any type of drug, it is best to be tested within 24 hours.
- want emergency contraception, the medication should be started within 72 hours.
 - to find your nearest emergency contraception provider, use this [NHS site](#) and insert your postcode.
 - [the Havens](#) have three specialist centres in London for people who have been raped or sexually assaulted, and can offer emergency contraception.
- would like HIV prophylaxis (PEPSE - a combination of drugs that can prevent HIV infection), the medication should ideally be started within 12 hours. It must be taken within 72 hours.

Preserving Forensic Evidence:

- [The Havens](#) also offer a service to collect and store any forensic evidence while you decide whether or not to report the incident to the police. If you want forensic evidence to be collected you should attend the Havens as soon as you can, advisably within 72 hours of the sexual assault.

To preserve any evidence as best as you can, try to take the following steps when possible:

- Do not wash.
- Do not brush your teeth.
- Do not have a cigarette.
- Do not eat or drink.
- Do not change your clothes.
- If you do change your clothes, do not wash them and put them in a clean paper bag.
- Try not to go to the toilet.
- Do not clear anything away or let other people or animals enter the area where the incident took place.

However, do not worry if you have already done some of these things, as it is still possible that there will be forensic evidence to collect.

3. Do you want to take some time to talk or think things through?

If the situation is not an emergency, you may want to take some time to think things through or to talk to someone you trust, such as a friend, family member or a member of Student Support Services. You can reach them at student.support@sothebysinstitute.com

Although SIAL staff are not specifically trained to provide specialist support for survivors of sexual abuse, they can provide initial support and signpost you to specialist services.

Professional staff, such as the Counsellor, offer support for a wide range of issues, and you can contact them at counselling@sothebysinstitute.com. Counselling is private and confidential, unless, in exceptional circumstances, where it is deemed there is a life-threatening risk to yourself or to others, or if there is a legal duty to report. We can also offer a wellbeing check-in without any commitment for ongoing support if preferred.

You may prefer to speak to someone outside of the school, such as a specialist support service for survivors of sexual assault, and there are details about these organisations in Appendix 3.

4. Reporting

Reporting immediately

If you have just been attacked you can call **999**, alternatively you can call **101** for a less urgent response.

If you have been sexually assaulted in the last seven days and would like advice about forensic examination or about reporting to the police, you can call the Havens on **020 3299 6900**.

Police

- When you give your statement to the police try not to leave anything out, however embarrassing or painful it may be. If you can't remember something, it is okay to say so.
- Don't be afraid to tell the truth about things like how much you had to drink, or using recreational drugs as this may harm the chances of prosecution if the police have been misinformed.
- You may choose to report the incident anonymously, to get the perpetrator on the police radar. As this may not lead to their arrest it could help build a fuller picture and make another reported case stronger.

Reporting later

- Some people choose to take time to think about what they want to do, which may lead to you reporting the incident later.
- If you are not sure what to do, you can go to a Haven centre as they can talk you through the different options available to you. They can store forensic evidence for you for up to two years while you decide what you want, and they also provide assistance and support which you can access without reporting to the police.

Reporting to SIAL

- Even if you choose not to report the incident to the police, you can still report it to SIAL if it involves a student or staff member. SIAL will take your report very seriously and have a team of staff to support you, as well as staff who can investigate the incident if that is what you want to do.
- In order to report another student or a staff member to SIAL, please complete the Disclosure of Misconduct Form (Appendix 2) and email it to one of the contacts

provided, as appropriate. Alternatively, you can also report anonymously by completing an online form [at this link](#); however, please bear in mind that anonymous disclosure will inevitably limit both the scope of any investigation and also the scope of any subsequent outcome.

5. External agencies

For expert advice on these issues, you can contact **Rape Crisis UK**, who have lots of information and support that might help. You can contact their 24/7 Rape & Sexual Abuse Support Line and speak to one of their specialists – at any time of the day or night. Call free on [0808 500 2222](tel:08085002222) or go to the website to start a [free online chat](#).

For a full list of other external agencies who would also be able to offer advice and support following rape or sexual abuse, please see Appendix 3.

Appendix 5: Risk Assessment**PRIVATE AND CONFIDENTIAL**

This form may be used by officers of IOALL in conducting any of the procedures under the Harassment, Bullying and Sexual Misconduct Policy and Procedure, including to assist with determining whether interim measures may be necessary. A separate form needs to be completed for each individual student involved with the case.

This form must be kept strictly confidential, as it may contain special category and/or criminal records data. It should only be shared on a strictly necessary basis.

Student Details

Student Name	
IOALL School	
Programme of Study	
Year of Study	
Date of risk assessment	

The following page contains the Risk Assessment Score System, where a score will be given for both 'likelihood' of the risk occurring, and how serious or extreme the impact of the risk would be, in the view of the assessors. The Overall Score is then calculated by multiplying the likelihood and impact score together for each 'element', to give an overall score for each element, and used to determine whether action is required.

In order that an objective assessment be made, it is recommended that two officers of IOALL complete this form, and that one of the officers be the Director or senior member of staff from either school. Where the above is not possible, for example, due to time constraints or staff availability, this form may be completed by one individual but reviewed and signed off by an additional senior member of staff.

Staff should ensure that form is fully completed and that the dates that the risk assessment is both undertaken, and signed off, are both entered.

A) Risk Assessment Score System

Score	Likelihood <i>This score indicates how likely the risk is to occur, in the view of the assessor(s).</i>	Impact <i>This score indicates, in the view of the assessor(s), how serious/extreme the impact would be.</i>
1	Highly Unlikely	Negligible
2	Unlikely	Minor
3	Possible	Moderate
4	Likely/Probable	Major
5	Highly Likely	Extreme

Overall Score

This score is calculated by multiplying the likelihood and impact score together for each element, to give an overall score for each element.

Table 2

Score	Risk Category
1 – 8	LOW
9 – 15	MEDIUM
16 – 25	HIGH

B) Likelihood Score

<i>Element</i>		<i>Likelihood</i>				
		1	2	3	4	5
		Highly Unlikely	Unlikely	Possible	Likely / Probable	Highly Likely
1	Risk to self					
2	Risk to other students					
3	Risk to staff					
4	Risk to public / others					
5	Risk to successful completion of programme of study					
6	Risk to placement / external activity					
7	Risk to school property					
8	Risk to school reputation					

C) Impact Score

<i>Element</i>		<i>Impact</i>				
		1	2	3	4	5
		Negligible	Minor	Moderate	Major	Extreme
1	Risk to self					
2	Risk to other students					
3	Risk to staff					
4	Risk to public / others					
5	Risk to successful completion of programme of study					
6	Risk to placement / external activity					
7	Risk to school property					
8	Risk to school reputation					

D) Overall Risk Assessment

Element		Likelihood Score	Impact Score	Overall Score (Likelihood Score multiplied by Impact Score)	Comments
1	Risk to self				
2	Risk to other students				
3	Risk to staff				
4	Risk to public / others				
5	Risk to successful completion of programme of study				
6	Risk to placement / external activity				
7	Risk to school property				
8	Risk to school reputation				
<ul style="list-style-type: none"> ACTION IS REQUIRED WHEN: <ul style="list-style-type: none"> There are three or more MEDIUM RISK categories indicated There is one or more HIGH RISK category indicated 					

Notes regarding overall risk / other risk(s) / pertinent information / additional comments

(Please use this box to indicate whether the results of the risk assessment indicate that interim measures are necessary.)

ACTIONS TO BE TAKEN:**ANY OTHER COMMENTS:****E) Completion of the Risk Assessment**

Name(s) of person(s) who completed the risk assessment	Role / Job Title	Signed	Date