


SEXUAL MISCONDUCT & HARASSMENT POLICY



Policy Review

Author/Owner	Position	Approved by:	Approval Date	Review Cycle Review Date	Published on Website Y/N
Sian Deasy & Tina Callow	Head of Higher Education and Adult Learning & Head of Student Experience	 Peter Thomas, Chair YC Corporation		Annually July	Y

Document Control – Revision History

Author/Owner	Summary of Changes	Date	Date last reviewed by SED	Version	Recommend to SED Y/N
Sian Deasy	Added numbering. Replaced 'Tootoot' with TalkCampus. Added 'related policies & procedures' section.	14.04.2022		v1	
Donna Short	No changes required at this time.	26.05.23			
Sian Deasy	Addition of 1.5 line spacing, left justification, and contents table in line with accessibility good practice. Added sections on record keeping and training. Aligned definitions of Sexual Misconduct and Harassment to Office for Students statement of expectations. Added detail in section 3 on accessing immediate support and handling disclosure. Updated references to other policies with title changes, eg, Safeguarding policy has become Safeguarding & Prevent Policy. Added reference to Upskirting in section 2.4. Included staff in section 6.3 Support Available.	16.06.23		v2	
Sian Deasy	Minor clerical changes, and clearer signposting to out-of-hours safeguarding protocols.	23/05/24			
Sian Pering	Updates to content in line with the introduction of Condition of Registration E6 from the Office for Students. Including addition of section "APPROPRIATELY INFORMING, AND PROTECTING LEARNERS FROM BEHAVIOR THAT MAY AMOUNT TO HARRASSMENT AND / OR SEXUAL MISCONDUCT", adding content around Freedom of Speech, clarifying approach to Policy update and accessing historical versions, adding detail of action the College could take related to an individual who is neither a learner nor employee, making information related to investigation held in other policies more explicit, and making information related to staff misconduct in the context of abuse of power in intimate relationships more explicit.				

Initial Equality Impact Screening			
Has anyone else been consulted on this policy and/or procedure? Head of Higher Education and Adult Learning, Head of Student Experience, colleagues from the Open University as part of the Institutional Approval event in 2023. Reviewed by a Student Voice Officer as part of 2024 update cycle.			
What evidence has been used for this impact screening? Review in line with Office for Students Statement of Expectations and feedback from Open University colleagues. Safeguarding & Prevent Policy			
Declaration (please tick one statement and indicate any negative impacts) <div style="display: flex; align-items: flex-start;"> <div style="margin-right: 20px;"> <input checked="" type="checkbox"/> </div> <div> I am satisfied that an initial screening has been carried out on this policy/procedure and a full Equality Impact Assessment is not required. There are no specific negative impacts on any of the Protected Characteristics groups. </div> </div> <div style="margin-top: 10px;"> <input type="checkbox"/> </div> <div style="margin-top: 10px;"> I recommend that an Equality Impact Assessment is required by the Equality and Diversity group, as possible negative impacts have been identified for one or more of the Protected Characteristics groups as follows: <div style="margin-left: 40px;"> <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Gender Reassignment <input type="checkbox"/> Race <input type="checkbox"/> Religion or belief <input type="checkbox"/> Sex <input type="checkbox"/> Sexual orientation <input type="checkbox"/> Marriage & civil partnership <input type="checkbox"/> Pregnancy & maternity </div> </div> <div style="margin-top: 20px;"> Completed by Author: Sian Deasy Position: Head of Higher Education and Adult Learning Date: 16.06.23 Reviewed by Equality & Diversity Group: _____ Date: _____ We confirm that any recommended amendments have been made Completed by Author: _____ Position: _____ Date: _____ </div>			
Summary of Comments/Recommendations from Equality & Diversity Group Review:			
Amended by Author:		Position:	
Date:			

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1. **PURPOSE**

- 1.1. This Policy outlines the College's position on sexual misconduct and harassment, and outlines policies and protocols that learners, staff, visitors, and other individuals must follow if they experience, witness, or become aware of sexual misconduct or harassment.
- 1.2. In line with the Office for Students' Condition of Registration E6¹, this Policy serves as the "single comprehensive source of information" on subject matter relating to incidents of harassment and sexual misconduct, including intimate personal relationships between relevant staff members and learners. In line with Condition E6, this Policy is published on the Yeovil College website² alongside other public-facing policies and procedures.
- 1.3. This Policy should be applied in ways that are consistent with principles of free speech, and not have the object or effect of restricting freedom of speech within the law. In particular, learners being exposed to the content of relevant course materials (including books, videos, sound recordings, or pictures) or statements made and views expressed during teaching, research, or discussions of curriculum material connected to the programme of study are unlikely to amount to harassment³.

2. **DEFINITION AND SCOPE**

- 2.1. This policy applies to learners, staff, contractors, and visitors to Yeovil College.
- 2.2. This policy is not limited in scope to incidents which occur on the College's Mudford Road campus, and support outlined below can be accessed by all Yeovil College learners regardless of qualification type, location, or mode of study.
- 2.3. This Policy will be reviewed periodically, and updated to correct errors, improve clarity or accessibility, respond to learner, staff or stakeholder feedback, or to reflect changes in legal, regulatory, or technical requirements or advancements. Should a former learner or employee need to access a previous version of the Policy, they should contact the College and request this. If an investigation is taking place under this Policy at the point of its review and republication, any existing investigation will continue in line with the provisions of the version of the policy in force at the time of its commencement, unless to do so would be unlawful or breach newly introduced sector regulation.

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.yeovil.ac.uk/policies-reports/>

³ NOTE: Whilst appropriate discussion of curriculum material connected to a programme of study is unlikely to amount to harassment, this would not stop sexual misconduct or harassment that were to occur in an academic space (such as a classroom) from being raised or investigated under this Policy.

- 2.4. Sexual Misconduct and Harassment are serious matters, which may or may not overlap with other issues such as safeguarding, Prevent, bullying, harassment, hate crime, peer-on-peer abuse, harmful sexual behaviour, or breaches of the code of conduct (either learner code of conduct for learners, or business code of conduct for staff). Sexual misconduct and harassment can take place across any medium, including online.
- 2.5. **Harassment** (as defined by Section 26 of the Equality Act 2010, and Section 1 of the Protection from Harassment Act 1997) includes unwanted behaviour or conduct which can reasonably be determined to have 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, marriage or civil partnership, pregnancy & maternity, race, religion or belief, sex, and / or sexual orientation.
- 2.5.1. Harassment can include domestic violence and abuse (which can also involve control, coercion, threats), and stalking.
- 2.5.2. Harassment could also include any incidents of physical violence towards another person(s) on the basis of a protected characteristic, and hate crimes, such as those criminal offences which are perceived by the victim or any other person, to be motivated by hostility or prejudice, based on any of the protected characteristics as listed above.
- 2.6. **Sexual misconduct** relates to all unwanted conduct or attempted unwanted conduct of a sexual nature. This includes, but is not limited to:
- Sexual harassment (as defined by Section 26 (2) of the Equality Act 2010)
 - Unwanted conduct which creates an intimidating, hostile, degrading, humiliating or offensive environment (as defined by the Equality Act 2010)
 - Assault (as defined by the Sexual Offences Act 2003)
 - Rape (as defined by the Sexual Offences Act 2003)
 - Physical unwanted sexual advances (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)
 - Upskirting (as defined by the Voyeurism (offences) Act 2019)
 - Intimidation, or promising resources or benefits in return for sexual favours (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)
 - Distributing private and personal explicit images or video footage of an individual without their consent (as defined by the Criminal Justice and Courts Act 2015).

- 2.7. Cases of reported misconduct will be managed in line with policies, procedures or protocols which are already embedded within the College. The nature of the situation will determine which process to follow. As outlined in more detail below, this may include the Safeguarding & Prevent Policy and Procedure; Learner Disciplinary Policy; Disciplinary & Grievance Policy and Procedure (staff conduct); or Respect at Work Procedure.
3. **APPROPRIATELY INFORMING, AND PROTECTING LEARNERS FROM BEHAVIOR THAT MAY AMOUNT TO HARRASSMENT AND / OR SEXUAL MISCONDUCT**
- 3.1 The College takes a range of steps to make a significant and credible difference in protecting learners from behaviour that may amount to harassment and / or sexual misconduct, and / or reducing the likelihood of these incidents taking place. These steps include, but are not limited to:
- 3.1.1 Ensuring all learners are appropriately informed to ensure understanding of the College's policies and behaviour that may constitute harassment or sexual misconduct, through:
 - 3.1.2 A clearly documented induction process that outlines acceptable, and unacceptable, behaviour to all learners, including signposting to relevant policies (such as the Sexual Misconduct and Harassment Policy), as well as how to raise concerns and seek support.
 - 3.1.3 Mandatory annual training for all HE learners through the online HE induction process to ensure understanding of policies and behaviour that may constitute harassment or sexual misconduct, including bystander training, and are aware of the content of this Policy.
 - 3.1.4 A robust tutorial programme, developed and delivered by specialist staff, that covers topics including healthy relationships and harmful sexual behaviour, with information shared in appropriate formats for different learner types, including the 'Theme of the Week' for Adult, HE, and Apprentice learners.
 - 3.1.5 Where appropriate, delivery of informational sessions by specialist external agencies around sexual misconduct, harassment, healthy relationships, and support available.
 - 3.1.6 Mandatory annual training for all staff on Safeguarding (more information on staff training can be found in section 9).

- 3.1.7 Opportunities for learner review of and input into relevant policies and procedures, including through the FE and HE Student Governors.
- 3.1.8 Collecting and regularly monitoring data on incidents of sexual harassment or misconduct affecting learners, and disseminating this information through the Safeguarding Group, where trends and key themes are reviewed to identify the effectiveness of steps being taken to protect learners from harassment and / or misconduct.
- 3.1.9 Regular review of key safeguarding data and emerging themes, and participation in local safeguarding forums to identify potential areas of risk or harm to learners and take appropriate steps to mitigate these.
- 3.1.10 Requiring all staff and learners to wear visible identification whilst on-site, and ensuring all visitors without an Enhanced DBS in place are escorted at all times.
- 3.1.11 As per section 3.6 of the Business Code of Conduct for staff, prohibiting intimate personal relationships (whether physically and / or emotionally intimate) between staff and any learner for whom that member of staff has direct academic or professional responsibilities, with the exclusion of relationships that existed before the date that the staff member became a relevant staff member in relation to that learner.
- 3.1.12 Prohibiting the use of measures to restrict the ability of a learner to disclose information of an allegation of harassment and / or sexual misconduct (e.g. through the use of a non-disclosure agreement).

4 **REPORTING BEHAVIOUR THAT MAY AMOUNT TO HARASSMENT AND / OR SEXUAL MISCONDUCT**

- 4.1 **Learners who experience or witness any incident of harassment or sexual misconduct** should report this to an appropriate member of staff with whom they feel comfortable sharing this information (such as their tutor or a member of the Student Experience team). Learners can also raise a concern by calling the safeguarding phone (07973898849), during working hours. Learners will not be victimised for coming forward and sharing concerns. In situations which are also a safeguarding concern, the appropriate reporting structures from the Safeguarding & Prevent Policy⁴ should be followed. If a learner discloses an incident of harassment or sexual misconduct to a member of staff, that member of staff must follow the guidelines for dealing with disclosure, as outlined in the

⁴ Available at www.yeovil.ac.uk/policies-reports

Safeguarding & Prevent Policy. If a learner has raised a concern with a member of staff and is unsure whether this has been appropriately followed up, they should initially speak to that member of staff to ask what action has been taken. If appropriate action has not been taken, the learner should then escalate their report to either their Curriculum Area Manager, the Head of Student Services, or another relevant manager within the college.

- 4.2 **Staff who witness or learn of sexual misconduct or harassment in relation to a learner** must follow the Safeguarding & Prevent Policy. In situations which require an immediate response is required, staff should call the Safeguarding phone for immediate assistance (07973 898849), during working hours, or follow the out-of-hours protocols outlined in the Safeguarding & Prevent Policy and Procedure outside of these times.
- 4.3 **If a staff member experiences sexual misconduct or harassment themselves**, they should follow the Respect at Work Policy and Procedure. In situations which require an immediate response, staff should contact the HR department during working hours.
- 4.4 **Visitors must report any concerns related to sexual misconduct or harassment** in line with the Safeguarding & Prevent Policy and the safeguarding information provided at sign-in. If the concern requires an immediate response, they can ring the safeguarding phone (07973898849), during working hours.
- 4.5 **Contractors must report any concerns related to sexual misconduct or harassment** in line with the Safeguarding & Prevent Policy and the Contractor Code of Conduct. If the concern requires an immediate response, they can ring the safeguarding phone (07973 898849), during working hours.
- 4.6 The College takes reports of sexual harassment and misconduct very seriously. In instances of anonymous or third-party disclosures, the College would endeavour to investigate in a proportionate manner based upon the information available. Owing to the College's statutory duty around safeguarding, confidentiality cannot be guaranteed to those making disclosures.
- 4.7 In line with the principles outlined in the Safeguarding & Prevent Policy, if receiving a disclosure around sexual misconduct or harassment, the staff member or volunteer receiving the disclosure should:
- 4.7.1 Listen to what is being said without displaying shock or disbelief.
- 4.7.2 Accept what is being said.
- 4.7.3 Allow the person making the disclosure to talk freely.

- 4.7.4 Reassure the person making the disclosure, but do not make promises which it might not be possible to keep, and never promise to not tell anyone.
- 4.7.5 Reassure the person making the disclosure and that it is the right thing to tell.
- 4.7.6 Listen, and only ask questions if clarification is needed.
- 4.7.7 Explain what has to be done next and who has to be told.
- 4.7.8 Immediately take appropriate action to record the disclosure and inform the relevant parties in line with the appropriate policy (either the Safeguarding & Prevent Policy if the concern pertains to learner, or the Respect at Work Policy and Procedure if the disclosure is coming from a member of staff who has experienced or witnessed sexual misconduct or harassment personally).
- 4.7.9 The staff member or volunteer who received the disclosure should seek support following a disclosure, as this can be a distressing experience.

5 ACTION TO BE TAKEN IN RESPONSE TO A REPORT

- 5.1 Depending upon the nature of the report made in line with Section 4, various actions might be taken to investigate, respond, and / or provide appropriate support.
- 5.2 Any investigation would be undertaken in line with established policies and procedures for investigating the conducts of learners or staff, which uphold the principles of natural justice, and would be undertaken by an appropriate member of staff who has received sufficient training and is free from the reasonable perception of bias.
- 5.3 **If the allegation is around the actions or behaviour of a member of staff (including a volunteer or member of the corporation),** the Safeguarding & Prevent Policy will be followed. The Safeguarding & Prevent Policy includes clear guidance around handling disclosure, recording, information sharing, actions to be taken, and timelines for outcome. This may include taking steps to investigate, as outlined in the Allegations against Adults Policy and Procedure.
- 5.4 **If the allegation surrounds actions or behaviour of a current learner,** investigation may be undertaken in line with the Learner Disciplinary Policy including following protocols for where misconduct might also constitute a Criminal Offence (section 11), if appropriate. In line with the Learner Disciplinary Policy, appropriate reasonable adjustments may be made

to ensure learners can access appropriate learning for the duration of the investigation. In instances where internal investigation of a learner is undertaken, this should be led by an appropriately qualified member of staff, such as the Head of Student Services. Dependent upon the nature of the circumstances, it might also be necessary to consult with other agencies or specialists with appropriate expertise. Any investigations will be undertaken by staff who are free from any reasonable perception of bias. Confidential information will be used and shared as far as is appropriate to allow the College to meet its duty to safeguard learners and ensure appropriate investigatory and / or disciplinary action is taken. This will likely involve reporting via internal safeguarding systems, including MyConcern. Upon beginning the process, the person leading the investigation will clearly communicate to the learner or learners involved expected timescales for completion. It must be noted that dependent upon the situation it may not always be possible to give an accurate deadline for completion of proceedings, especially where external agencies are involved, including but not limited to situations where misconduct may constitute a criminal offence, and completion of internal proceedings is therefore dependent upon the involvement of these external agencies.

5.5 If the allegation surrounds the actions of behaviour of an individual who is neither a learner nor a member of staff the actions that the College can take may vary, and in these instances it may not always be possible to take investigatory action, although this would not stop learners from being able to access support. Examples of circumstances in which the College might be able to take action in response to reports of actions of an individual who is neither a learner nor a member of staff include, but are not limited to:

5.5.1 In line with the Safeguarding and Prevent Policy, the College may be required to share information with other organisations in order to safeguard individuals from harm or risk of harm, such as informing another education setting of information related to a learner enrolled with them.

5.5.2 If an incident occurred in a workplace where a learner is employed as an apprentice, or is undertaking a work placement as part of their Study Programme, the College may work alongside the relevant employer to seek assurance that appropriate investigation and / or remedial action has been taken.

5.5.3 If an incident occurred on the College site, investigation may be undertaken in line with the Health and Safety Policy's protocols around accident, incident, near miss, or dangerous occurrence reporting and investigation. This may include issuing a banning notice and / or informing the police of an individual's conduct.

- 5.5.4 In instances where it is not possible for the College to take investigatory action around a report, the reporting party will be signposted and encouraged to contact an appropriate authority who could progress their concerns, such as the Police. Whether or not the College is able to investigate the allegation will not impact upon a learner's ability to access support, as outlined below.

6 INVESTIGATION OUTCOMES AND DISCIPLINARY PROCEEDINGS

- 6.1 In instances where a college investigation identified sexual misconduct or harassment had occurred, appropriate disciplinary action would be taken, either in line with the Disciplinary & Grievance Policy for Staff, or the Learner Disciplinary Policy for learners. Disciplinary proceedings would be conducted by staff who are appropriately trained and free from any reasonable perception of bias.
- 6.2 Those involved in disciplinary proceedings would be appropriately supported, in line with the Disciplinary & Grievance Policy for Staff, or the Learner Disciplinary Policy for learners.
- 6.3 Outcomes of any disciplinary proceedings would be reported to those whose conduct is being investigated, including a clear rationale for the decisions, in line with established timescales as per the Disciplinary & Grievance Policy for Staff (typically 5 working days from the point of disciplinary meeting), or the Learner Disciplinary Policy for learners⁵. In both instances, it should be noted that timescales for confirming an outcome may be extended if an incident is being investigated by police.
- 6.4 Individuals would have a right of appeal against the finding of an investigation, in line with the Disciplinary & Grievance Policy for Staff, or the Learner Disciplinary Policy for learners.

7 SHARING OF OUTCOMES

- 7.1 Those reporting cases of sexual misconduct or harassment should be mindful that it is rarely appropriate to share the full details of a disciplinary investigation or its outcomes with a reporting party.
- 7.2 However, once an investigation has been concluded and any timeline for appeal exhausted, the individual who has undertaken the investigation should inform the reporting party that the investigation has now been completed, and the summary outcome, insofar as whether or not the concern/complaint was upheld, and an outline of the rationale for this decision. They should also share any outcomes of the investigation, such as sanctions

⁵ Available at www.yeovil.ac.uk/policies-reports

applied, where they relate to the reporting party or those who have witnessed or experienced sexual misconduct or harassment – for example, whether the individual will be continuing to work / study at the organisation, or if there are restrictions in place to limit their contact with the reporting party such as not being timetabled to be in the same classes. This communication should also include steps that the reporting party should take if an incident were to occur or recur in future⁶, so they are confident in routes to share any future concerns, should this be required.

- 7.3 In addition, the individual conducting the investigation should identify if there are any other impacted individuals (such as those who may have experienced or witnessed the behaviour, even if they were not the reporting party) who should be informed of these outcomes.
- 7.4 If it is not possible to share the detail outlined above, or an impacted or reporting party asks for further information that it is not possible to share – for example, if a matter has now been taken over by the police and is an active investigation, or the level of detail they are requesting would require the divulging of protected or sensitive information linked to another person - the individual who has undertaken the investigation should clearly inform the reporting or impacted party why this is, explaining the reasoning.

8 SUPPORT AVAILABLE

- 8.1 Learners wishing to seek support in relation to experiencing or witnessing harassment or sexual misconduct can speak to their tutor or contact a relevant member of the Student Services team at College. Learners may also choose to seek support from a range of external agencies, including NSPCC, BASE from Barnardo's, Somerset Phoenix Project, their GP, the police, other voluntary organisations such as Women's Aid, Victim Support, Somerset Integrated Domestic Abuse Service (SIDAS), The Survivors Trust or Survivors UK. Learners may choose to approach any of these, or other, specialist external agencies independently, or may ask the Student Services Team for assistance in making contact or in identifying an external agency who can provide specialist support related to a learner's specific needs or circumstances. Learners do not need to have made a formal complaint in order to receive this support. This support sits in addition to pastoral support available to all learners, including via the Wellbeing Support section on Moodle, and via dedicated wellbeing app access.

⁶ NOTE: Even in a case where a concern was not upheld, it is important to ensure the reporting party is aware of how to share any concerns that may arise in the future.

- 8.2 Learners who are part of an investigation or disciplinary process, whether as a reporting or responding party, will be offered the opportunity to access support, and can request to speak to a member of the Student Services team in order to access pastoral and wellbeing support at any point during the process, including before an investigation, during an investigation, and / or following its outcome. This support sits in addition to pastoral support available to all learners, including via the Wellbeing Support section on Moodle, and via dedicated wellbeing app access.
- 8.3 If a learner who has experienced or witnessed sexual misconduct or harassment, or is involved in an investigation or disciplinary process, whether as a reporting or responding party, is concerned about the impact on their academic studies, they should speak to their Programme Leader or Study Programme Manager who can advise on support available, such as how to request extensions to deadlines, or access Exam Access Arrangements.
- 8.4 Learners and staff are welcome to make requests for reasonable adjustments to be made to their study or work arrangements for the duration of the period of investigation, or as part of a risk assessment / safety plan. However, there is no guarantee that adjustments could be made, especially where a requested adjustment would limit the College's ability to provide education and training and safeguard learners.
- 8.5 Visitors or contractors who witness or experience sexual misconduct or harassment may choose to seek support via a range of agencies and organisations, including, but not limited to, NSPCC, BASE from Barnardo's, Somerset Phoenix Project, their GP, the police, other voluntary organisations such as Women's Aid, Victim Support, The Survivors Trust or Survivors UK.

9 RECORDING AND RECORD KEEPING

- 9.1 Any information received or obtained in connection to incidents of harassment and / or sexual misconduct will be handled sensitively and used fairly, in line with the College's Data Protection Policy, irrespective of the mechanism used to share this information.
- 9.2 Those raising concerns or reporting information should be aware that information shared may be shared with those they are raising concerns about as part of an investigatory or disciplinary processes, to allow the subject of the allegation to appropriately respond to the concerns raised against them. However, information would only be shared as far as was appropriate to achieve this objective.

- 9.3 In line with the Safeguarding & Prevent Policy, any concerns related to learners will be reported via MyConcern, and information stored securely in line with the College's Data Protection Policy, and established retention periods outlined in the Retention of Records Policy.
- 9.4 In line with the Respect at Work Policy and Procedure, appropriate records will be kept by HR of any disclosures made or allegations made where staff experience sexual misconduct or harassment, and information stored securely in line with the College's Data Protection policy, and established retention periods outlined in the Retention of Records Policy.

10 **TRAINING FOR STAFF**

- 10.1 As outlined in the Safeguarding & Prevent Policy, all new starters receive mandatory training on a range of important topics, including but not limited to safeguarding, Prevent, female genital mutilation, gender identities, and must read Keeping Children Safe in Education. There is also a requirement to read a range of key documents and policies, including the Sexual Misconduct and Harassment Policy.
- 10.2 As part of the ongoing mandatory CPD programme, all employees of the College undertake annual update training on safeguarding and key relevant legislation, which includes an annual update on sexual misconduct and harassment, delivered by appropriately qualified specialist staff. Alongside this, the Designated Safeguarding Lead provides regular updates on key themes, and more in-depth CPD across a range of safeguarding and Equality, Diversity and Inclusion (EDI) topics is scheduled throughout the year in line with statutory requirements, sector good practice guidance, and staff feedback.
- 10.3 The impact and effectiveness of all CPD is evaluated, in line with College-wide principles.
- 10.4 Staff in roles that are most likely to be providing support to learners who have witnessed, experienced, or are involved in investigatory processes linked to sexual misconduct and harassment – such as those in Safeguarding or Student Support roles – access further, specialist, training related to their roles. This may include specialist safeguarding training, mental health awareness training, harmful sexual behaviours training, and / or training in receiving and documenting disclosures.

11 **RELATED POLICIES AND PROCEDURES**

- Safeguarding & Prevent Policy and Procedure
- Disciplinary & Grievance Policy (Staff)

- Learner Disciplinary Policy
- Respect at Work Policy and Procedure
- Whistleblowing Policy and Procedure
- Office for Students Condition E6⁷
- Keeping Children Safe in Education
- Retention of Records Policy
- Sexual Offence Act (2003)
- Equality Act (2010)
- Voyeurism Act (2019)
- Equality and Human Rights Commission: Sexual harassment and the law (2017)
- Protection from Harassment Act (1997)
- Business Code of Conduct (staff)

⁷ <https://www.officeforstudents.org.uk/for-providers/student-protection-and-support/harassment-and-sexual-misconduct/condition-e6-harassment-and-sexual-misconduct/>