AWARD-WINNING EDUCATION

HOPWOOD HALL COLLEGE

Higher Education Harassment & Sexual Misconduct Policy

2025 – 2027

The Queen's Anniversary Prizes 2023

2022/23 BEACON AWARDS WINNER

north educate awards

Policy Cover Sheet

Please fill in the following details:

Policy Name	HE Harassment and Sexual Misconduct (HSM) Policy
Version Number	V1
Policy Owner	Adam Carney
Release Date	24th June 2025
Policy valid for	2 Years

Documents included:

Completed Checklist (below)	
Policy text	
Filled in EIA	

Where should this policy be shared? All policies will be shared on the HUB.

The HUB	X
Net Consent	
Website	X

Policy Checklist

Have you completed the following tasks:

Used the Microsoft Accessibility Checker	X
Used formatted headings	X
Used Arial 12pt font	X
Included numbered paragraphs	X
Included page numbers	X
Included alternative text for all images which accurately describe what's in the picture	X
Checked for gender neutral language e.g. remove dinner ladies, workmen, he/she and replaced with servers, contractors, they.	X
Used the full phrase instead of the acronym at least the first time	X
Used the spelling and grammar check	X
Gained feedback from colleagues to ensure the policy is clear and accurate	X
Included any legal, social or organisational changes since the last policy review	X
Reviewed the connected policies to ensure they are still active	X
Filled in the change log	X
Listened to the policy using the accessible reader	X
Reviewed the policy flowchart	X
Informed the EDI Manager of upcoming policy deadlines	X

Sign Off: To be filled in by the named person only

	Name	Date
SLT	Lisa Woodman	23rd July 2025
Corporation (if required)		
Trade Union		
EIA	Adam Carney	23rd July 2025

Change log

Version number	Changes description	Major changes?	Initiator	Rationale	Date of completion	New version number
N/A	Standard format	N	Adam Carney	New policy	June 2025	V1

1. Introduction and purpose

1.1 This document sets out Hopwood Hall College's position on Harassment and Sexual Misconduct (HSM). It outlines the measures we will take to prevent HSM as well as the response students can expect should instances of HSM take place.

1.2 This policy has been developed to align with the Office for Students Condition of Registration E6: Harassment and sexual misconduct (effective from 1 August 2025), as well as with other statutory duties such as Equality Act 2010.

1.3 Hopwood Hall College is committed to developing a culture that is free from Harassment and Sexual Misconduct (HSM) by both staff and students. The college also supports a culture of accountability and is dedicated to supporting and responding to disclosures.

2. Scope

2.1 **What this policy covers:**

This policy covers incidents of harassment and/ or sexual misconduct which:

- impact one or more students
- relate to the conduct of staff towards students, and/ or students towards students.
- impact students on any higher education course
- includes behaviour taking place in the real, physical, online or digital context.

2.2 **What this policy does not cover:**

- Students impacted by HSM who are registered on non-HE courses will find relevant information can be found in the Bullying and Harassment (inc. Cyber Bullying, Sexual Harassment and Hate Crime) policy and procedure.
- Staff impacted by incidents of HSM should refer to the Bullying and Harassment (inc. Cyber Bullying, Sexual Harassment and Hate Crime) policy and procedure.
- Additional statutory requirements for adults at risk are outlined in our Safeguarding and Child Protection policy.

All policies referenced above can be found:

https://www.hopwood.ac.uk/about/reports-policies/

3. Policy Principles

3.1 The college is committed to implementing preventative measures to protect students from incidents of HSM (which are detailed in section 3.7-3.9) as well as appropriately responding to any incidents which do occur

3.2 Support will be provided to all students impacted by incidents of HSM.

3.3 Students will be involved in the development and review of this policy by student voice sessions and feedback activities.

3.4 We are committed to maintaining all relevant information about HSM relating to students in one place, which you will find on our HE policy page: https://www.hopwood.ac.uk/university-centre/legal/

3.5 Students will be informed of policies related to HSM during their induction weeks. These policies will also be accessible on student-directed platforms and in the Higher Education section of the Hopwood Hall College website.

3.6 Staff will be informed about the availability of this information via NetConsent, where the policy can be read and downloaded. New starters will be introduced to this information as part of their induction activities.

3.7 We are committed to providing adequate opportunities for appropriate training of students/ staff. (which will include also some mandatory training), (e.g. on consent, bystander, disclosure, investigation training etc) which is consistent with free speech obligations.

3.8 Students will be appropriately informed of the college's policy on harassment and sexual misconduct (HSM). To ensure students understand behaviours that may constitute HSM, training sessions will be included as part of the induction programme for new students. These sessions will cover the different types of

harassment and sexual misconduct, how to report concerns, and the potential implications for perpetrators.

3.9 Posters will be displayed throughout the campuses to raise awareness of all forms of sexual harassment, misconduct, and harmful sexual behaviours. In addition, the 'Call It Out' campaign provides a mechanism for reporting incidents, supported by posters featuring QR codes and relevant contact details.

3.10 Staff will be appropriately trained, with an up-to-date understanding of this policy and behaviour that may constitute HSM, and relevant knowledge and skills to support students who wish to disclose, report, complain or are actual or alleged perpetrators of HSM, or undertake investigations or make decisions.

3.11 We are committed to having a variety of reporting mechanisms available to our students (including online and face to face options, for victims, witnesses, third parties, anonymous reporters). You will find more information about reporting in section 5.1.

3.12 We recognise the need to treat and hold information related to students in the context of cases of HSM sensitively and with appropriate confidentiality (in line with Data Protection Policy to be found at https://www.hopwood.ac.uk/about/reports-policies/

3.13 The college is committed to upholding freedom of speech and academic freedoms, whilst implementing the requirements of the Office for Students Condition of Registration E6: Harassment and sexual misconduct.

3.14 This means, for example, that subject matter connected with course content is unlikely to constitute harassment, unless otherwise demonstrated.

3.15 Where incidents of HSM are investigated by or on behalf of the college, these are not criminal investigations, and judgements reached do not constitute a legal ruling on whether or not criminal activity has taken place.

3.16 It is important to recognise some forms of HSM will constitute a criminal offence. The college may refer to the police or other trusted third parties any incidents in the form HSM where a criminal offence has taken place. Other third parties could include Local Authority Safeguarding teams and Social Services,

3.17 Students over the age of 18 have the option to report to the police when HSM has taken place.

3.18 The college will support criminal proceedings where appropriate or required and it is most likely that (other than immediate measures, such as temporary suspension, when relevant) no action will be taken under internal procedures until the outcome of any criminal investigation is known.

3.19 The college is committed to and required to take steps to protect students from any conflict of interest or abuse of power.

3.20 Personal relationships between staff members and students aged 18 and above are strongly discouraged as stated within the Professional Guidelines for staff and will be banned from September 2025. Further information on the definition found section 6.

3.21 As a college, we are committed to never using a non-disclosure agreement (NDA) in any instance involving sexual harassment, discrimination, abuse or misconduct, or other forms of harassment and bullying. The college supports any individuals right to speak safely and confidently about what has happened to them.

4. Support

4.1 We are committed to providing appropriate support options targeted at the needs of students involved in any way in an incident of HSM. This includes procedural support through any process, emotional personal support, and academic support.

4.2 This includes (but is not limited to) support for those who have alleged and/or experienced incidents of HSM and actual or alleged perpetrators.

4.3 Students can access support by contacting Safeguarding Team throughout the calendar year in person, by phone or email.

4.4 Contact details can be found in the appendix for Safeguarding Team.

4.5 Contact detail for additional external services can be found in appendix (section 8)

4.6 **Students with Additional Support Needs**

- Support should be always made available to students. Any staff member can refer the students to the Safeguarding and Wellbeing team. The role of the team is to provide help and support for the student and assist with possible strategies to encourage positive behaviour.

- The team will also support staff to consider the impact of Adverse Childhood Experiences (ACEs) or other vulnerabilities that maybe a factor in the presentation of behaviour. A student can self–refer to the college counsellor or social prescriber by speaking to their Pastoral Welfare Officer (PWO), attending the drop-in sessions or via a phone call or email, the safeguarding and wellbeing digital hub and the wellbeing hub at both campuses.

5. Procedure

5.1 **Reporting**

The college provides the following options for reporting incidents of HSM:

5.1.1 Students should report incidents of HSM to tutors and safeguarding and pastoral support staff.

5.1.2 If a person chooses to disclose anonymously, the college is unlikely to be able to take any direct action on the basis of their disclosure. Anonymised data will help the college to understand patterns in behaviour and inform future policy.

5.1.3 Student can approach any member of staff and who will centrally record and reported on within the College on an incident report form which can be found on the Hub.

5.1.4 These reporting options are open to victims, witnesses, third parties, anonymous reporters

5.1.5 If the Student is vulnerable, example under an Education, Health, Care, Plan (EHCP) or supported by external services or involves other students, college will have a duty to act.

5.1.6 Incidents of HSM being shared with third parties can have serious implications, particularly when the victim has an Education, Health and Care Plan (EHCP).

5.1.7 Sharing such information with parents or carers must be handled with great care, ensuring that it is done in a way that supports the victim and respects their autonomy especially if they can make decisions about disclosure.

5.1.8 There may be additional statutory requirements if the reporter is under 18/ adult at risk, in line with our (HE Safeguarding Policy)

5.1.9 Investigations and Outcomes

5.1.10 The college is committed to ensuring that those responsible for receiving information about, investigating, or taking decisions on matters relating to incidents of harassment and/or sexual misconduct are appropriately trained.

5.1.11 The college is committed to keeping all persons directly affected by any decisions made in respect of incidents of harassment and/or sexual misconduct directly informed about the decisions and the reasons for them. This includes, but is not limited to, persons who have alleged and/or experienced incidents of harassment and/or sexual misconduct and actual or alleged perpetrators.

5.1.12 These outcomes are detailed in the HE Positive Behaviour Support policy from section 6.2. All instances of poor behaviour should include a restorative element or skills development as well as a punitive element if required. The focus should be to allow the student to understand how and why their behaviour or conduct fall short of the college expectations and provide an opportunity to repair and rebuild relationships at college (with staff and students). However, we aim to use our best endeavours and make reasonable adjustments for students.

5.1.13 Safeguarding and Welfare Team can support Curriculum Managers with this process.

5.1.14 Stage 1 – Informal resolution (Low Level Behaviour)

5.1.15 The college supports the principle of early interventions in the management of behaviour. This is to ensure there is positive dialogue and support for students and get them back on track in college. Minor breaches of expectations should be dealt with informally by staff as part of their general management of students and personal development.

5.1.16 Examples of appropriate interventions at this stage include modelling expected behaviours, restating expectations, positive corrective feedback, use of non-verbal signals and feedback, reminder of rules and expectations,

distraction or diversion, use of praise for desired behaviours, use of options and choice for behaviour.

5.1.17 Staff at all points should describe the behaviour and not the person as this could reinforce negative past experiences and shame. Staff should treat students with dignity and respect and in line with college values and professional guidelines. It is important at this stage to try and establish any underlying cause of the student's problems, and which may influence action taken now and in the future. These may include: Problems at home/outside College; Difficulty with understanding work being set or feelings of failure, Previous ACEs (Adverse Childhood Experiences), Problems with peers e.g. bullying, harassment, ongoing incidents, Hidden disabilities e.g. Attention Deficit Hyperactivity Disorder; mental health problems, dyslexia, Drug/alcohol problems;

5.1.18 This may also require referral for safeguarding and the student should be included as a student 'at risk' and monitored accordingly.

5.1.19 Low level behavioural concerns must be recorded on ProMonitor by staff. Repeated failure to adhere to behavioural expectations need to be recorded on the central college incident reporting form as well as noted on ProMonitor. centrally. As per the colleges Data Protection Policy, only college academic and support staff have access to these records.

5.1.20 **Stage 2 – Formal Verbal Warning:**

5.1.21 An accumulation of behaviour (depending on the frequency and severity – in line with the Low-Level behaviour or incident (reporting on an incident form) may lead to the student receiving a Formal Verbal Warning (Stage 2) from the Curriculum Manager or Centre Director. When the Warning has been issued, the Curriculum Manager should notify the parent/carer where the student is under 25 with an EHCP and record this on the students ILP. A formal verbal warning will result in actions being set and supportive measures being put into place. A review meeting will also be scheduled at this time. The review meeting will be scheduled 6 weeks after the warning has been given.

Following this review meeting, if the student has met the outcomes of the actions, this will be recorded and no further escalation will be undertaken. Reasonable adjustments and support must be considered for SEND and vulnerable students.

5.1.22 Stage 2 – Formal Written Warning:

5.1.23 Where behaviour is regarded as more serious in nature, or the student has already received a formal verbal warning for behaviour, the students will be invited to attend a disciplinary meeting with a Curriculum Manager or Centre Director who has been previously uninvolved with the incidences or behaviour. An independent member of the Safeguarding and Wellbeing Team will complete an investigation and submit an incident form. The incident form must be submitted and the behaviour investigated with statements and evidence collected. The investigation will be completed within 10 working days

5.1.24 A record of the meeting and the outcome must be recorded on the students ILP and parents/carer informed where the student is under 25 with an EHCP. Reasonable adjustments and support must be considered for SEND and vulnerable students. The student will be provided with at least 5 working days notice of the meeting and is entitled to attend the meeting and provide mitigating circumstances. The student can also be accompanied by a friend or relative, but not by a legal or other professional adviser unless by prior agreement with the College.

5.1.25 During the disciplinary meeting, the investigating officer (Curriculum Manager or Centre Director) will determine if, on the balance of probabilities and considering all the evidence presented, the disciplinary decision should be upheld. It is the college's responsibility to demonstrate that the student contradicted the behaviour policy.

5.1.26 If upheld, a written warning letter will be issued. The letter must be uploaded on the student's ILP and a copy sent to the students registered address. Other than in exceptional circumstances, further cases of poor behaviour will result in the escalation to the next stage: Senior Leadership Disciplinary Hearing.

5.1.27 A review meeting will be scheduled 6 weeks after the written warning letter has been issued. Following this review meeting, if the student has met the outcomes of the actions, this will be recorded and no further escalation will be undertaken. Reasonable adjustments and support must be considered for SEND and vulnerable students.

5.1.28 Stage 3 – Senior Leadership Disciplinary Hearing:

5.1.29 Suspension Pending Hearing – a student may be immediately suspended pending a SLT disciplinary hearing by either the Curriculum Manager or Centre Director. In exceptional circumstances, a Designated Lead Safeguarding Officer or Manager may suspend where there is reason to believe that the student has committed an act of Gross Misconduct.

5.1.30 Any such suspension will be confirmed in writing within two days of its occurrence and the student will be invited to attend a SLT Disciplinary hearing. Where appropriate, this would be accompanied with a telephone call to the parents/guardian if the student has an agreed and identified Inclusion need. In preparation for the hearing, all necessary information should be gathered including any relating to safeguarding.

5.1.31 Final Written Warning / Exclusion (permanent or fixed term). In cases where there is an alleged incident of gross misconduct (see above), or where a student has been escalated from Stage 2 with no improvements in their behaviour or conduct, the Curriculum Manager or Centre Director will instigate Stage 3 of the process by informing the Safeguarding and Wellbeing represenative and Safeguarding and Wellbeing Manager. They will oversee the case and confirm the SLT hearing will take place. Staff involved in decision making will be independent and separate from those previously involved in prior stages.

5.1.32 A member of the Safeguarding and Wellbeing Team will instigate the gathering of all information, statements and evidence (including CCTV) and complete the investigation report. The Curriculum Manager or Centre Director will approve this and include their recommendation for the SLT hearing.]

5.1.33 The student should be given at least 5 working days' written notice of the hearing. A follow up telephone call by a member of the Student College Services (SCS) Team to ascertain receipt of the invitation.

5.1.34 SCS will set up the SLT Disciplinary hearing which will include: the SLT Chair, an Independent Manager, the student and a Safeguarding and Wellbeing Mentor to provide support for any restorative interventions resulting from the hearing. The student can also be accompanied by a friend or relative, but not by a legal or other professional adviser unless by prior agreement with the College.

5.1.35 It is the Chair's responsibility to ensure that the full rationale and outcome is recorded. This should be shared with the Safeguarding and Wellbeing Mentor to be recorded on the students ILP.

5.1.36 SLT Disciplinary Hearing: Where a student is financially sponsored by an employer or organisation, the employer or a representative of the organisation should be informed of the details of the hearing at least 5 days in advance of the hearing.

5.1.37 The SLT Chair will make a formal record of the meeting and use this for any appeal hearings or subsequent communication regarding the hearing.. If the student does not attend the hearing and there are no reasonable grounds notified for their absence, the Chair may proceed to deal with the allegations, and, if necessary, impose the necessary sanctions. The absence of the student and the grounds for continuing the hearing must be formally minuted. Safeguarding and Wellbeing Mentor or representative will attend the meeting and will highlight any special consideration points relating to the students special educational needs or education, health and care plan or vulnerabilities.

5.1.38 During the SLT disciplinary hearing, the investigating officer (Safeguarding and Wellbeing Mentor) will determine if, on the balance of probabilities and considering all the evidence presented, the disciplinary decision should be

upheld. It is the college's responsibility to demonstrate if the evidence presented meets threshold for gross misconduct.

5.1.39 If the outcome of the hearing is a Final Written Warning, this will be confirmed verbally and in writing by Chair by letter to the student and their parent/carer. The letter will include advice of any changes of behaviour required, compliance with which is a condition of continuing without further escalation of their disciplinary sanction. This should be shared with the Behaviour Lead to be recorded on the students ILP.

5.1.40 Where a Final Written Warning has been given, continuation of the behaviour may result in referral to the SLT Chair which can take place without the need for a further SLT Disciplinary hearing. This should be recorded on the ILP.

5.1.41 Confirmation of Exclusion (fixed term or permanent): Where the outcome of the hearing is exclusion, the SLT Chair must ensure that the written communication of an exclusion has been made to the student within 2 working days of the SLT disciplinary hearing. The decision and rationale to exclude must be communicated to other members of the SLT, Safeguarding and Wellbeing Mentor and Safeguarding and Wellbeing Manager, Curriculum Manager and Centre Director, independent manager and the Safeguarding and Wellbeing Mentor. The Chair should record the outcome on the students ILP.

5.1.42 SCS also need to be notified to submit a change of circumstance form to HE Finance to inform them that the student is no longer studying at the college.

5.1.43 Outcomes will include an explanation of how evidence was weighed up and a conclusion made.

5.2 **Stage 4 -Appeals:**

5.2.1 The student will have a right of appeal to the Principal against any recommendation or penalty, including exclusion. Notice of appeal must be lodged with administation@hopwood.ac.uk within 5 working days of the

outcome and must give the grounds and brief particulars of the appeal. The Appeal will be heard by the Principal or other SLT member (not involved previously with the hearing) as necessary.

5.2.2 The grounds could include the following:

- That the procedures were not followed properly.
- That the decision maker(s) reached an unreasonable decision.
- That the student has new material evidence that they were unable, for valid reasons, to provide earlier in the process.
- That there is bias or reasonable perception of bias during the procedure.
- That the penalty imposed was disproportionate, or not permitted under the procedures.

5.2.3 Following a Decision to Exclude, should a student seek to re-enrol in future, their excluded status will be clearly visible on the EBS screen to the enrolment admin. This must be referred to the Safeguarding and Wellbeing Mentor and Safeguarding and Wellbeing Manager for consideration and decision. The Safeguarding and Wellbeing Manager will consult with other managers or SLT where required.

5.2.4 A written Completion of Procedures (COP) outcome letter of the appeal will be sent to the student setting out the outcome, with explanation and reasoning. The student has the right to refer their case to the Office of the independent adjudicator within 12 months of the receipt of the COP letter. The letter will also include where and how to access support.

Variations and Amendments to this Procedure:

5.2.5 In exceptional circumstances and in cases of significant gross misconduct or criminal behaviour, it may be desirable and in the interests of fairness, the

College's duty of care and student safety to make variations to either Stage 3 or 4 of the process (e.g. variation in timescales). Such variations must only be made by or with the agreement of the Senior Leadership Team and the Safeguarding and Wellbeing Manager. The SLT member or Safeguarding and Wellbeing Manager will be responsible for informing the student or their representative of the variation in advance and the decision made.

5.2.6 If the student has any relevant confidential information, this will be shared with the SLT Chair confidentially to consider. This information will be provided by the DSO and the information managed in accordance with the Safeguarding and Child Protection Policy.

5.2.7 Subject to sections in this document regarding informing parents of students under eighteen years of age or the financial sponsor of any student, all proceedings and related documents of stages 1, 2 and 3 (Formal Verbal or Written Warning or Exclusion) shall be confidential and used only for the purposes of the Disciplinary Procedure.

5.2.8 All information made available during the disciplinary process, will be treated on a ‘need to know’ basis, including any sensitive personal data. This will be used and stored in line with the Data Protection Policy.

5.2.9 The expectation for standards of behaviour to be adhered to is the same for all students; however the college recognises that there may be some instances where students with Inclusion needs (SEND), Education, Health and Care Plans (EHCPs) learning support needs and mental health needs require additional consideration on a case by case basis (such as those students with learning difficulties or disabilities; literacy difficulties; vulnerable young people or adults and those students with mental ill health). Students can speak to their tutor or the learning support team if they require access to support and help them understand the process.

5.2.10 All staff must be conscious of the needs of students who may have SEND or additional learning or communication needs which could have an impact on them either following college behavioural expectation or being disadvantaged by a process which relies on written communication and formal interviews. Support needs and considerations will be detailed on ProMonitor which should be used to inform appropriate communication and reasonable adjustments.

5.2.11 Staff must consider the individual needs of students and adapt the processes, with advice from the Learning Support Manager, in order to ensure that they are treated fairly and equitably.

5.2.12 Adaptations and adjustments may include:

5.2.12.1 Reasonable adjustments are made as soon as possible and before poor behaviour escalates;

5.2.12.2 Referral to the Safeguarding and Wellbeing Team.

5.2.12.3 Ensure the Learning Support team are informed to support with any strategies that could resolve or support positive behaviour

5.2.12.4 Adapting the language in any written communication including alternative formats or languages;

5.2.12.5 Providing additional advice to ensure that the student understands every stage of the process;

5.2.12.6 Providing interpretation services at any meetings, interviews or hearings;

5.2.12.7 Providing support staff to accompany students at meetings;

5.2.12.8 Case conference meetings or student meetings rather than formal disciplinary panels;

5.2.12.9 Early Reviews or professionals meeting in the case of students with EHCPs

5.2.12.10 In deciding what disciplinary action to take, consider the students ability to understand the College code of conduct and the degree to which the student has been supported to understand and follow it. This may be particularly relevant for students with inclusion needs.

6. Definitions

6.1 **Harassment** has the meaning given in section 26 of the Equality Act 2010 and includes (but is not limited to) unwanted behaviour or conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. It is connected to one or more of the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation
- Pregnancy
- Civil partnership and marriage status

Under this definition, harassment also includes:

- Domestic violence and abuse (which can involve control, coercion, and threats).

- Stalking
- Incidents of physical violence based on a protected characteristic
- Hate crimes motivated by hostility or prejudice based on disability, race, religion, sexual orientation, or transgender identity.

6.2 **Sexual misconduct** relates to all unwanted conduct of a sexual nature. It includes, but is not limited to:

- Sexual harassment (as defined by Section 26 (2) of the Equality Act 2010): unwanted conduct of a sexual nature where this conduct has the same purpose or effect as the first type of harassment. In other words, it involves any behaviour or actions (in person with or without direct contact/ touching, or remote) related to sex that create an intimidating, hostile, degrading, humiliating, or offensive environment for the complainant or violates their dignity.

  Examples are:

  - Unwelcome sexual advances,
  - Inappropriate touching
  - Sexual jokes
  - Displaying pornographic material
  - Sending communications with sexual content

- Unwanted (or attempted unwanted) conduct creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- Assault (as defined by the Sexual Offences Act 2003): if someone intentionally touches another person, the touching is sexual and the other person does not consent or they do not reasonably believe that the other person consents.
- Rape (as defined by the Sexual Offences Act 2003): sexual penetration without the person's consent.

- Physical unwanted sexual advances

6.3 Gross Misconduct: Gross misconduct refers to the most serious breaches of acceptable behaviour. Any particularly serious cases of misconduct may be treated by the College as gross misconduct and may require the immediate suspension of the student and includes the following (this is not intended to be an exhaustive list):

6.3.1 Behaviours that contravene the law will result in a suspension until those committing the action and the appropriate authorities being informed as necessary.

6.3.2 Use of violent or threatening behaviour (including the carrying of weapons both real and imitation and whether or not they have been used or their use has been threatened).

6.3.3 Use of language or behaviour which is or may be considered offensive or discriminatory under the terms of the Equality Act 2010 (see Equality, Diversity & Inclusion Policy - HE EDI policy).

6.3.4 Harassment, bullying and cyberbullying (physical or verbal, including by electronic means e.g. text messages, email, social networking sites, taking or distributing photos/videos without the subject's permission. Behaviour that is unwelcome, uninvited and causes detrimental effect; verbal or physical aggression(Refer to Bullying and Harassment Policy and Procedure for more detailed guidance)

6.3.5 Sexual Harassment / Sexual Harmful Behaviours / Child on Child Abuse. Vandalism, on or off College premises

6.3.6 Possession of fireworks or other explosive or flammable materials

6.3.7 A breach of the ICT Acceptable Use Policy that involves criminal activity or involves accessing or sharing racist, discriminatory or extremist materials including pornography.

6.3.8 Evidence of extremism as advised by the police.

6.3.9 Unsafe behaviours including the use of motor vehicles, motorcycles and scooters, on the College site in a manner which presents risk of harm to others.

6.3.10 Misrepresentation of others including making malicious or harmful allegations.

6.3.11 Any criminal activity which has brought or may, in the opinion of the Senior Leadership Team brings the College into disrepute (irrespective of whether it takes place on College property or in College time)

6.3.12 Where the behaviour constitutes gross misconduct, the student will be suspended pending college disciplinary action, early Education and Health Care Plan (EHCP) review, police action or intervention from an external agency (multi-agency meeting). It will be dealt with as a stage 3 intervention in the procedure

6.4 non-disclosure agreements (NDAs) are clauses, often written into contractual documents, restricting the ability of a student to disclose information about an allegation of harassment and/or sexual misconduct.

6.5 Intimate personal relationship means a relationship that involves one or more of the following elements:

i. physical intimacy including isolated or repeated sexual activity; or
ii. romantic or emotional intimacy

7. Related documents

May include the following (with hyperlinks):

HE Safeguarding and Child Protection Policy

HE Positive Behaviour Policy

Bullying and Harassment Policy

Speaking Out Policy and Procedure

8. Appendix

Hopwood Hall College Safeguarding and Wellbeing Support – Tel: 07850323664/ 07917233738 (incl out of hours)

Email: safeguarding@hopwood.ac.uk

Safeguarding Team available in-person in Henry West building (Middleton) or on-site at Rochdale Campus in college open hours.

External support services can be accessed through a doctor or practice nurse at a GP surgery or hospital A&E department,

For Greater Manchester, Saint Mary's Sexual Assault Referral Centre (SARC), contactable 24 hours on 01612766515.

Rochdale Victim Support on 01615079609 (24/7 Support line: 0808 1689111)

Rochdale and Oldham Active Recovery (ROAR) ON 0300 555 0234

Rape Crisis England & Wales - is an organisation that promotes the needs and rights of all genders who have experienced sexual violence, to improve services to them and to work towards the elimination of sexual violence. https://rapecrisis.org.uk/