

St Hild College Harassment and Sexual Misconduct Policy

1. Introduction

St Hild College is committed to providing a safe, respectful, inclusive, and dignified environment for all students, staff, and visitors. We believe in the inherent worth of every individual and the importance of fostering an academic and spiritual community in which all people can thrive. In line with the Office for Students' (OfS) Condition E6 and its guidance regarding Freedom of Speech this comprehensive policy outlines our commitment to preventing and addressing all forms of harassment and sexual misconduct. This document serves as the single, central, authoritative source for the College's strategy, processes, and expectations in these areas.

2. Purpose and Scope

2.1 Purpose

The purpose of this policy is to ensure that:

- All members of the College community understand what constitutes harassment and sexual misconduct.
- Robust systems are in place to prevent such behaviors.
- Students and staff know how to report concerns and access support.
- Investigations are handled fairly, promptly, and sensitively.
- Perpetrators are held accountable through appropriate disciplinary procedures.
- The College meets its obligations under Condition E6 of the OfS regulatory framework.

2.2 Scope This policy applies to:

- All students registered with St Hild College, whether doing Durham awards or not.
- All College staff and associates, including faculty, operations staff, contracted and visiting staff, chaplains, placement supervisors, personal tutors and Board members.
- Any activity associated with the College. This includes all teaching and supervision (whether in person or online) and all activity while on placement.
- If anyone involved in alleged misconduct is more appropriately held accountable by another organization (eg. their church or employer) then St Hild will support any complainant to report and seek resolution through the policies and procedures of the relevant organization.

3. Definitions

3.1 Harassment

Harassment includes any unwanted conduct which has the purpose or effect of:

- Violating another person's dignity;
- Creating an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment can be physical, verbal, written, online, or psychological. It may relate to characteristics protected under the Equality Act 2010.

In determining whether conduct amounts to harassment, the following will be considered:

- the **perception of the individual** experiencing the conduct;
- the **other circumstances of the case**; and
- whether it is **reasonable** for the conduct to have that effect.

Harassment can occur:

- as a **single serious incident** or a **pattern of behaviour**;
- in **person, online, or through other communication methods**;
- between individuals of any gender or status (including student–student, staff–student, or staff–staff interactions).

3.2 Sexual Misconduct

Sexual misconduct includes any unwanted or inappropriate behaviour of a sexual nature. Examples include:

- Sexual harassment (verbal or non-verbal)
 - Verbal could include innuendos, suggestive comments or sexualized jokes
 - Non-verbal could include touching, staring, catcalling or wolf-whistling
- Sexual assault, including rape
- Coercion, manipulation, or threats to gain sexual favours
- Sharing intimate images or videos without consent
- Stalking or persistent unwanted attention with sexual connotations
- Exploitation of power dynamics for sexual purposes

3.3 Consent

Consent is the agreement to participate in a specific activity, given freely and actively by an informed person. Consent must be freely given, without coercion or manipulation, specific and informed, reversible at any time and an ongoing process.

3.4 Relevant Staff

Staff with academic, pastoral, or operational responsibilities for students where a significant power differential exists between the staff member and student. This will include SLT, centre heads, tutors / lecturers, (core, associate and visiting), core and personal tutors, placement supervisors, operations staff and chaplains.

4. Preventative Measures

St Hild College affirms the dignity of all persons and works proactively to build a culture of mutual respect, openness, and accountability. Prevention efforts include:

- Our values statement, published online and displayed on campus
- Our staff standards policy, agreed to by all staff and available on moodle
- Our student code of conduct, signed by all students and available on moodle
- Regular worship and spirituality sessions which reinforce our values and culture

5. Staff-Student Relationships

5.1 Staff-Student Intimate Relationships

The following section only applies to relationships between staff and students. It does not apply to relationships between staff members or between students. If an individual is *both* a staff member *and* a student then for the purposes of this policy they are a student.

With the sole exception of pre-existing relationships, intimate personal relationships between staff and students are strongly discouraged at St Hild. For the sake of clarity, pre-existing means prior to the staff member or student joining the College.

Any staff member who has developed, or is developing, an intimate relationship with a student since they have become a staff member should immediately disclose this to the Principal. Failure to disclose may result in disciplinary action, including termination of their contract. Students may also disclose such relationships but the burden of responsibility to do this lies with the staff member.

For the definition of 'staff' see section 3.4 above

5.2 Abuse of Power

No staff member should ever abuse their power so as to:

- treat a student either favorably or unfavorably for the purposes of developing or exploiting an intimate personal relationship
- put pressure on a student so that they do something, or refrain from doing something, that they may not have otherwise done

Behaviors that might constitute abuses of power include:

- unwarranted poor or favourable grading on assignments
- provision of additional tutorials or academic support that is not available to other students
- unwarranted poor or favourable references or recommendations
- invitations to events or introductions to people that are not available to other suitable students
- or other actions that may promote or hinder their academic or professional career that are not otherwise warranted

6. Reporting and Investigation Procedures

6.1 Reporting Options

Any allegation of harassment and / or sexual misconduct may be made to:

- The Centre Head
- The Safeguarding Lead or Deputy Safeguarding Lead

If the allegation relates to the Safeguarding or Deputy Safeguarding Lead, or if the student has reason to believe they will not receive a fair hearing from the Safeguarding Lead or Deputy Safeguarding Lead then:

- The trustee responsible for safeguarding, Huw Thomas

6.2 Principles of Reporting Process

- Complainants will be treated with dignity and respect at all times.
- Reports will normally be acknowledged within 2 working days.
- Reports can be made by witnesses or third parties with the consent of the individual affected (where appropriate or possible)
- All reports will be recorded, regardless of outcome

6.3 Informal and Formal Resolution

This policy needs to be read in conjunction with St Hild's Safeguarding policy and the Student Complaints policy. If at any time, the student feels that their concern is more appropriately addressed through either of those policies, then they are encouraged to access the provisions in those policies. In particular, if a student is concerned that what they have experienced or witnessed represents a safeguarding concern, then they must report this to the Safeguarding Lead or Deputy Safeguarding Lead immediately.

There may also be times when the staff member who hears the concern feels that it is more appropriately addressed via one of those policies, and they may choose to escalate it in that way.

Nevertheless, there may be other occasions where the most appropriate procedure for the concern is one of the following:

- Informal resolution at a local level for example through the provision of advice, a mediated conversation, or verbal or written apologies. Such informal resolution will only be taken where appropriate and agreed to by all parties. Informal resolution may also involve receiving advice from the Safeguarding Lead or Deputy Safeguarding Lead. If all parties do not agree or if other outcomes or forms of resolution are deemed to be required then some form of formal investigation will be carried out (see below). Given that the informal approach requires all parties to agree, it is essential that the staff member who hears the complaint makes it clear

to any complainant that an informal approach to resolution is being adopted. If the complainant disagrees with this then the formal approach (below) is required.

- Formal investigation – see below

6.4 Formal Investigation Process

This procedure will only be invoked where:

- a formal safeguarding investigation has not been initiated

AND

- a formal complaint has not been initiated

If either of those two processes has commenced then the procedures set out in the respective policies will be followed. An occasion where a formal investigation is required and neither of the above two policies is initiated might be where an incident is witnessed, but those involved in the incident do not wish to complain or raise an issue. There might be other circumstances where this also applies.

In such scenarios, the investigation may involve:

- interviews with all parties involved (with supporters present if wanted)
- examination of any available supporting evidence

Investigations will be concluded within 30 working days wherever possible and findings and decisions communicated in writing with reasons provided. Investigations will always involve at least two members of staff of which one must be the Safeguarding Lead or Deputy Safeguarding Lead.

6.5 Investigation outcomes

The outcome of an investigation may take any of the following forms. In certain circumstances, more than one of these outcomes may be initiated simultaneously:

1. A referral to the safeguarding team
2. Implementation of the student disciplinary policy, in particular its 'disciplinary panel' stage and therefore application of any of its penalties.
3. Implementation of the staff standards and disciplinary policy, including and up to dismissal for gross misconduct
4. A recommendation to submit a formal complaint
5. Dismissal of the concerns raised without any further action (this could include the complainant being subject to the student disciplinary policy if evidence emerged that their complaint was malicious or intentionally false.)

6. Outcomes will be recorded for future reference

7. Support for Students and Staff

7.1 For Complainants

Both staff and students have access to the usual forms of pastoral support that are available in the College. This includes chaplains, core and personal tutors and centre heads. Students can make application for counselling support funded by the College for up to six sessions. In addition, students can make requests via the usual forms for extensions and other academic accommodations without penalty. Staff members can discuss with their line manager whether some time off or a temporary change in duties would be helpful.

Some of the below external sources of support may be helpful:

- [Police](#)
Call 101 to report or search by your location to report online: [Contact us | Police.uk](#)
- [Citizens Advice](#)
Citizens Advice has more information about what you can do if you've experienced, or know someone who has experienced, a hate incident or crime. [Reporting a hate crime or hate incident to the police - Citizens Advice](#)
- [Rape Crisis England and Wales](#)
Rape Crisis Can provide support if you have experienced any form of sexual harassment or violence, including helping you find a local Crisis Centre. [Rape Crisis England & Wales](#)

7.2 For Respondents

All respondents also have access to the same pastoral care and support as complainants. In addition, the staff and student disciplinary policies provide details on rights to appeal. There may also be some academic adjustments that can be made during investigation procedures.

7.3 For Witnesses or Third Parties

Witnesses and others have access to the same pastoral care and support.

8. Staff and student awareness

The existence of this policy will be brought to the attention of all new students at induction, and all existing students via existing electronic channels. It will be signposted to all staff through relevant staff meetings and highlighted in induction procedures. The full policy will be available on the College website and moodle. It will be signposted in the student overview handbook

9. Use of Non-Disclosure Agreements (NDAs)

St Hild College does not and will not use non-disclosure agreements (NDAs) or confidentiality clauses to:

- Prevent disclosure of incidents of harassment or sexual misconduct
- Silence individuals who wish to speak about their experiences

Students or staff will never be asked to sign agreements that restrict their legal right to report, seek support, or speak publicly about their experiences.

10. Freedom of Speech

This policy does not in any way infringe the rights of both staff and students with respect to freedom of speech. Our freedom of speech policy which protects those rights remains operative, and nothing in this policy should be taken to imply restriction on the provisions contained in that policy. However, the right to freedom of speech does not extend to conduct that amounts to harassment or misconduct as defined above. St Hild will balance freedom of speech with its duty to provide a safe environment for all students and staff.

11. Governance, Monitoring, and Accountability

The Principal and SLT have ultimate responsibility for implementation of this policy. Council will receive an annual report on any incidents that are disclosed as part of this policy, including their outcomes. The policy will be subject to biennial review at the Formation and Academic Affairs Subcommittee.

12. Contact Points

Pip Martin (Safeguarding Lead)

Tel: 07496 269336

Email: Pip.martin@sthild.org

Justin Thacker (Deputy Safeguarding Lead)

Tel: 07812 658105

Email: Justin.thacker@sthild.org

13 Consultation

Student representatives were involved in the development of this policy. It is subject to biennial review at our Formation and Academic Affairs committee which also has student representation. The policy has also been informed by the recent 'Listening Exercise' and will continue to be cognizant of the annual CASS results.

Approved: May 2026

For Review: May 2028