



VERITAS SCHOOL OF BUSINESS & TECHNOLOGY

HARASSMENT AND SEXUAL MISCONDUCT POLICY AND PROCEDURES

Framework for prevention, reporting, support, investigation, decision-making and institutional assurance

DOCUMENT CONTROL	
Status	Approved
Document title	Harassment and Sexual Misconduct Policy and Procedures
Reference	VSBT-STU-POL-HSM-001
Version	1.0
Date	July 2026
Previous version/date	New document
Classification	Internal and External - controlled document
Responsible owner	Principal / Designated Safeguarding Lead
Prepared by	Quality Assurance
Recommended by	Senior Management Board
Approval by	Board of Directors
Received by	College Oversight Board & Academic Board
Next review	April 2027, or earlier where legal, regulatory or institutional change requires



Document status and control

External referents

Referent	Application	Official source
Office for Students	Condition E6: Harassment and sexual misconduct and accompanying technical guidance. The restriction-on-disclosure requirements took effect on 1 September 2024; the remaining provisions came fully into effect on 1 August 2025.	Open source
Equality Act 2010	Including section 26 (harassment and sexual harassment) and applicable education and employment provisions.	Open source
Worker Protection (Amendment of Equality Act 2010) Act 2023	Employer duty to take reasonable steps to prevent sexual harassment of employees.	Open source
Protection from Harassment Act 1997	Civil and criminal protections relating to a course of conduct amounting to harassment.	Open source
Sexual Offences Act 2003	Relevant criminal offences and statutory framework for consent.	Open source
Higher Education and Research Act 2017	Statutory framework for the regulation of higher education in England.	Open source
OIA Good Practice Framework	Disciplinary procedures and related good-practice principles for higher education providers.	Open source
UK GDPR and Data Protection Act 2018	Lawful, fair, secure and proportionate handling of personal and special-category data.	Open source

Related VSBT documents

- Student Code of Conduct and Disciplinary Procedure
- Staff Disciplinary and Grievance Procedures
- Complaint Policy and Procedure
- Safeguarding and Prevent Policy
- Equality, Diversity and Inclusion Policy
- Freedom of Speech and Academic Freedom Policy
- Data Protection Policy and Privacy Notices
- Student Support and Welfare Policy
- Fitness to Study Policy
- Mitigating Circumstances and Academic Appeals Policy
- Whistleblowing Policy
- Risk Management Policy
- Student Handbook and Staff Handbook

Table of Contents

Section	Title	Page
1	Introduction and purpose	3
2	Scope and applicability	4
3	Policy principles and institutional commitment	4
4	Definitions and terminology	4
5	Standards of behaviour and prohibited conduct	5
6	Prevention and significant, credible steps	6
7	Intimate personal relationships between staff and students	6
8	Reporting, disclosure and access routes	7



Section	Title	Page
9	Immediate response, risk assessment and safeguarding	7
10	Support for students and staff	8
11	Confidentiality, information sharing and data protection	8
12	Formal investigation and decision-making protocol	8
13	Allegations that may constitute a criminal offence	9
14	Precautionary and interim measures	9
15	Outcomes, sanctions, communication and appeals	9
16	Roles and responsibilities	10
17	Training, awareness and competence	10
18	Monitoring, data, evaluation and governance assurance	10
19	Publication, prominence and version control	11
20	Freedom of speech and academic freedom	11
21	Equality, accessibility and reasonable adjustments	11
22	Protection from retaliation and misuse of the procedure	11
23	Policy review	12
Appendix A	Quick reporting and response guide	12
Appendix B	Illustrative examples of sexual misconduct	12
Appendix C	External support and emergency contacts	13
Appendix D	Version history	13

1 Introduction and purpose

1.1 Veritas School of Business & Technology (VSBT) is committed to providing a safe, inclusive and respectful environment in which students, staff, contractors, visitors and partners can study, work and participate without harassment, sexual misconduct, gender-based violence, victimisation or abuse of power.

1.2 VSBT adopts a zero-tolerance position towards harassment and sexual misconduct. Zero tolerance means that reports will be taken seriously, safety and welfare will be prioritised, appropriate action will be considered, and conduct will not be ignored or normalised. It does not mean that allegations will be presumed proven without a fair process.

1.3 This Policy and Procedures document constitutes VSBT's single comprehensive source of information for the purposes of OfS Condition E6. It establishes the College's authoritative framework for prevention, reporting, support, investigation, decision-making, communication, monitoring, staff-student relationships, freedom of speech, non-restriction of disclosures and review. Other VSBT documents may support or signpost this framework but must not contradict, undermine or replace the minimum requirements set out here.

1.4 The immediate priority following a disclosure, whether current or historic, is the safety and welfare of the person making the disclosure and any other person who may be at risk. Support is available whether or not a formal report is made and whether or not the incident occurred on VSBT premises or in connection with study or employment.

1.5 This policy does not replace the criminal justice system. VSBT may take action under its own procedures where conduct may also constitute a criminal offence, applying the civil standard of proof and its own disciplinary jurisdiction.

2 Scope and applicability

2.1 This policy applies to incidents of harassment and/or sexual misconduct affecting one or more students, including conduct by staff towards students and conduct by students towards students.

E6 implementation control. Before approval and publication, evidence trained case roles, conflict-free decision-makers, trauma-informed reporting and support, risk assessment, secure records, staff-student relationship controls, staff training and tested retention of historical public versions. Reconcile the internal policy and public E6 source clause by clause.

2.2 It applies to all higher education students registered with, taught by, or studying for an award provided by VSBT, regardless of course level, mode, location, delivery partner, apprenticeship status, nationality or whether delivery is face-to-face, online, blended, in the United Kingdom or overseas. For the purposes of Condition E6, "students" also includes persons who are registered on a higher education course and who, at any point during the overall duration of that course, are employed by or otherwise provide services to a higher education provider.

2.3 The policy applies to conduct occurring:



- on any VSBT campus or premises;
- during teaching, assessment, tutorials, placements, field trips, social events, travel or other College-related activities;
- through email, messaging services, social media, virtual learning environments or other digital platforms;
- off campus where the conduct affects a member of the VSBT community, creates a risk to students, or has a material connection with VSBT;
- within partnerships, subcontracted provision, work placements and activities delivered on behalf of VSBT; and
- before a person joined VSBT or after they left, where support, safeguarding, risk management or institutional action remains appropriate and lawful.

2.4 Staff-to-staff matters are also subject to VSBT's employment policies and the statutory duty to prevent workplace sexual harassment. Where a matter affects a student, this policy applies in addition to the relevant staff procedure.

2.5 Safeguarding procedures take precedence where a person is under 18 or is an adult at risk. VSBT may need to share information without consent where required to protect a child or adult at risk, prevent serious harm, comply with law or respond to an emergency.

3 Policy principles and institutional commitment

3.1 VSBT will apply the following principles:

- **Safety and welfare first.** Immediate risks will be assessed and proportionate protective measures considered without prejudging the outcome.
- **Respect and dignity.** All parties will be treated sensitively, without discrimination, blame or stereotyping.
- **Choice and agency.** The person making a disclosure will normally retain control over whether to make a formal report or contact the police, subject to safeguarding and serious-risk exceptions.
- **Fairness and natural justice.** Investigations and decisions will be impartial, evidence-based, free from reasonable perceptions of bias and fair to all directly affected parties.
- **Accessibility.** Multiple reporting routes, reasonable adjustments and accessible information will be provided.
- **Confidentiality and data minimisation.** Information will be shared only where necessary and lawful, while avoiding promises of absolute confidentiality.
- **Timeliness and communication.** Cases will be progressed without avoidable delay and parties will receive updates when timescales change.
- **No retaliation.** No person will be disadvantaged for making, supporting or participating in a report in good faith.
- **Proportionality.** Risk controls, findings and sanctions will reflect the circumstances, seriousness and impact of the matter.
- **Continuous improvement.** Data, student feedback, case learning and external developments will inform prevention and policy enhancement.

3.2 The minimum content requirements in this Policy and Procedures document take precedence over any additional information or provisions in this or any other VSBT document relating to harassment or sexual misconduct. Any supporting document, handbook, procedure, webpage or communication must be interpreted consistently with this single comprehensive source; where an inconsistency arises, this document prevails to the extent required to comply with Condition E6.

4 Definitions and terminology

4.1 Harassment

Harassment has the meanings given in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997. It includes unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, and a course of conduct that amounts to harassment under the 1997 Act.

4.2 Sexual misconduct

Sexual misconduct means any unwanted or attempted unwanted conduct of a sexual nature, including sexual harassment, sexual assault and rape. The term is interpreted broadly and may include physical, verbal, non-verbal, written, visual, online or technology-assisted conduct.



4.3 Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It also includes less favourable treatment because a person submitted to, or rejected, sexual harassment or conduct related to sex or gender reassignment.

4.4 Consent

Consent is agreement by choice where a person has the freedom and capacity to make that choice. Consent must be present for each sexual act, can be withdrawn at any time, and cannot be inferred from silence, lack of resistance, clothing, previous intimacy or a current relationship. A person may lack freedom or capacity because of intoxication, unconsciousness, age, disability, fear, coercion, abuse of power or another circumstance.

4.5 Report, disclosure and formal complaint

A disclosure is information shared about an experience or concern, often to seek support. A report is information provided to VSBT so that it can consider risk, support or action. A formal complaint is an explicit request for investigation or a formal institutional decision. VSBT may act on information even without a formal complaint where there is a serious or wider risk, while keeping the affected person informed as far as possible.

4.6 Parties and witnesses

The term reporting party refers to a person who reports or is reported to have experienced conduct. The term responding party refers to a person whose conduct is the subject of a report. These neutral terms do not indicate that an allegation is proven. A witness includes any person who may hold relevant information, including a person who reports on behalf of another.

4.7 Intimate personal relationship, relevant staff member and abuse of power

An intimate personal relationship involves physical intimacy, including isolated or repeated sexual activity, and/or romantic or emotional intimacy. A relevant staff member is an employee or contractor with direct academic responsibilities or other direct professional responsibilities for a student. Abuse of power occurs where a relevant staff member exploits their position to apply pressure that may cause a student to do, or refrain from doing, something they would not otherwise have done and that could reasonably lead to an intimate personal relationship.

4.8 Victimisation and retaliation

Victimisation or retaliation includes adverse treatment, threats, intimidation, exclusion, academic disadvantage, reputational harm or other detriment because a person made or supported a report, rejected conduct, participated in a process, sought support or exercised a legal right.

5 Standards of behaviour and prohibited conduct

5.1 Every member of the VSBT community must maintain professional boundaries, respect personal autonomy and consent, and avoid conduct that could reasonably be experienced as sexualised, coercive, threatening, degrading or exploitative.

5.2 Prohibited conduct includes, but is not limited to:

- sexual comments, jokes, innuendo, gestures, propositions or repeated requests for dates after refusal;
- sexualised staring, leering, intrusive questioning, discussion of another person's sex life or spreading sexual rumours;
- displaying, sending, posting, requesting or sharing sexual images, messages or recordings without a lawful and consensual basis;
- non-consensual creation, alteration or distribution of intimate images, including synthetic or "deepfake" material;
- unwelcome touching, hugging, massaging, kissing, blocking movement or invading personal space;
- pressuring, manipulating, threatening or offering academic, employment, financial or other advantage in exchange for sexual or romantic engagement;
- stalking, cyberstalking, grooming, coercive or controlling behaviour, spiking, indecent exposure, voyeurism or sexual exploitation;
- sexual assault, rape or any attempted sexual offence;
- conduct through social media, email, learning platforms, messaging applications or personal devices that would be prohibited in person;
- retaliation against, or interference with, any person involved in a report or investigation; and
- breach of the staff-student relationship rules in section 7.



5.3 The impact of conduct is assessed in context, including the perception of the person affected, whether it was reasonable for the conduct to have the relevant effect, frequency, power imbalance and all other circumstances. A person's intention is relevant but not determinative.

6 Prevention and significant, credible steps

6.1 VSBT will implement multiple, mutually reinforcing steps intended to make a significant and credible difference in preventing harassment and sexual misconduct and protecting students from their impact. These include:

- mandatory induction and annual refresher training for students on consent, boundaries, reporting, support and bystander action, with trauma-sensitive alternatives or adjustments where justified;
- mandatory training for all staff on expected behaviour, professional boundaries, reporting duties, support and freedom of speech principles;
- specialist training for staff who receive disclosures, undertake investigations, make decisions or manage appeals;
- accessible and prominent publication of this policy, reporting routes and support information;
- preventive risk assessment covering campuses, online spaces, events, placements, partnerships, transport, isolated working, alcohol-related activities and groups who may face heightened risk;
- clear codes of conduct, contractual expectations and proportionate disciplinary consequences;
- student consultation and engagement in policy design, communication, training and evaluation;
- appropriate staffing, independent expertise and case-management capacity;
- collection and analysis of incident, prevalence, reporting, outcome and satisfaction data, while protecting confidentiality;
- evidence-based evaluation of the effectiveness of interventions and adjustment where they are not delivering the intended impact; and
- due diligence and contractual controls for placement providers, contractors and partners, including expectations on reporting and non-disclosure arrangements.

6.2 The College will not treat low reporting numbers as evidence that misconduct is absent. It will consider reporting confidence, student feedback, survey evidence, risk indicators and sector evidence when assessing prevalence and effectiveness.

7 Intimate personal relationships between staff and students

Prohibition

Except for an excluded relationship defined below, any relevant staff member is prohibited from entering into or continuing an intimate personal relationship with any VSBT student. A breach will be addressed through the staff disciplinary procedure and may constitute gross misconduct, including the possibility of dismissal.

7.1 This prohibition protects students from actual or potential conflicts of interest, coercion, preferential or detrimental treatment, and abuse of power. It applies to employees and contractors, including teaching staff, assessors, supervisors, personal tutors, advisers, caseworkers, senior managers and any other person with direct professional responsibility for a student.

7.2 An excluded relationship is an ongoing intimate personal relationship that existed before 1 August 2025 and remains in existence, or existed before the staff member became a relevant staff member in relation to that student.

7.3 A staff member in an excluded relationship must disclose it promptly and confidentially to the Principal or HR lead. VSBT will record the disclosure and remove or manage the staff member's academic, assessment, supervisory, pastoral, disciplinary, reference, funding or other influence over the student. The student must not be disadvantaged or required to disclose the relationship publicly.

7.4 Where a pre-existing relationship changes so that a staff member becomes a relevant staff member, the staff member must disclose the relationship before assuming responsibility wherever practicable. Failure to disclose may be a disciplinary matter.

7.5 Students will not be disciplined merely for participating in a relationship with a staff member. They may report harassment, coercion, retaliation or sexual misconduct within any relationship and will be protected from retaliation. Support and reporting routes must not involve the staff member concerned.

7.6 Professional, compassionate and pastoral engagement within appropriate boundaries is not prohibited. Emotional intimacy arising through grooming, dependency or exploitation may, however, amount to an abuse of power.



8 Reporting, disclosure and access routes

Immediate danger or urgent medical need

Call 999. A person who has experienced rape or sexual assault may also contact an NHS Sexual Assault Referral Centre (SARC) directly. VSBT support can be accessed before, during or after contact with emergency or specialist services.

8.1 Reports may be made by students, staff, witnesses, visitors, contractors, placement providers, partners, family members or other third parties. VSBT accepts reports about current, recent or historic incidents and reports made on behalf of another person.

8.2 A person may report through any of the following routes:

- in person to Student Services, Registry, the Designated Safeguarding Lead, a personal tutor, programme leader, HR or any trusted member of staff;
- by email using the confidential harassment and sexual misconduct reporting address published on the public VSBT E6 webpage; until a separate dedicated mailbox is configured, a report may be sent to info@vsbt.co.uk using the subject line "Confidential - Harassment/Sexual Misconduct Report", and must be triaged promptly to authorised staff;
- using the online Incident Report Form maintained on the public VSBT website at www.vsbtc.co.uk;
- in writing addressed to the Head of Student Services or Designated Safeguarding Lead at 11 Albion Place, Maidstone, Kent, ME14 5DY; or
- for staff, through HR, a line manager, the grievance procedure or the whistleblowing route where appropriate.

8.3 A report may be anonymous. Anonymous information will be reviewed for safeguarding, risk, pattern identification and preventive action. An anonymous report may limit VSBT's ability to investigate, reach findings or provide an outcome, and will not by itself normally justify disciplinary action without reliable supporting evidence.

8.4 A person may seek support without making a formal complaint. VSBT will explain available choices, possible consequences, limits of confidentiality and what action may be necessary where there is a serious or wider risk.

8.5 Reports will be acknowledged normally within two working days. An initial safety and risk assessment will normally begin within two working days of receipt, or immediately where urgent.

9 Immediate response, risk assessment and safeguarding

9.1 The member of staff receiving a disclosure must:

- listen without judgement, avoid blame and use the person's own language where appropriate;
- check immediate safety and urgent medical needs;
- not press for unnecessary detail or attempt to investigate;
- explain confidentiality and its limits before the person shares further information where practicable;
- offer choices, support and accessible information;
- make an accurate, objective and secure record of what was said and any immediate actions; and
- refer promptly to the Designated Safeguarding Lead or authorised case manager.

9.2 The authorised case manager will assess risks to the reporting party, responding party, witnesses, the wider community, children or adults at risk, evidence integrity and continuity of study. The assessment will consider the wishes of the affected person while recognising that VSBT may need to act where there is a serious risk.

9.3 No person will be required to confront the responding party, participate in mediation or use an informal route. Mediation will not be used for alleged sexual violence, coercion, abuse of power or where it would be unsafe or inappropriate. Any informal option requires informed and freely given agreement and may be stopped at any time.

10 Support for students and staff

10.1 Appropriate support will be offered to students who disclose or report, students who are alleged or actual perpetrators, witnesses and other directly affected persons. Support will be needs-led, separate where appropriate, and available before, during and after any formal process.

10.2 Support may include:

- a named support contact independent of the investigator and decision-maker;
- safeguarding, welfare, counselling or external specialist referral;



- academic adjustments, changes to attendance arrangements, deadlines, assessments, timetables, groups, supervision, placement or campus access;
- mitigating circumstances or temporary interruption of study where requested and appropriate;
- safety planning, no-contact directions or practical changes to reduce interaction;
- information about police reporting, SARCs, independent sexual violence advisers and community services;
- reasonable adjustments, interpretation, accessible formats and culturally appropriate support;
- a supporter, representative or companion at meetings, subject to procedural rules; and
- support to maintain academic engagement where the student wishes to continue studying.

10.3 Support does not indicate that VSBT has accepted or rejected an allegation. Different staff should, where practicable, support the reporting and responding parties to avoid conflicts of interest.

11 Confidentiality, information sharing and data protection

11.1 Information will be collected sensitively, used fairly, stored securely and shared only with persons who need it for support, safeguarding, risk management, investigation, decision-making, legal obligations or regulatory assurance. Electronic reporting routes will be configured and managed so that sensitive reports are accessible only to authorised personnel, with prompt secure transfer from any general mailbox used as an interim route.

11.2 VSBT cannot promise absolute confidentiality. Information may be shared without consent where necessary to protect a child or adult at risk, prevent serious harm, respond to a threat to life, comply with law or court order, preserve the integrity of a fair process, or address a serious wider risk. Wherever possible, the affected person will be informed before such sharing.

11.3 Parties will be told how their information may be used, the categories of people who may receive it and the limits on confidentiality. Records will be retained in accordance with the Data Retention Schedule and applicable data protection law.

11.4 VSBT will not include or rely on any contractual term, settlement provision, non-disclosure agreement or other restriction that prevents or restricts a student from disclosing information about an allegation of harassment or sexual misconduct affecting one or more students. Legitimate confidentiality provisions protecting personal data, legal privilege or the integrity of an ongoing process must not be used to silence a student.

11.5 Parties must respect the privacy of others and must not intimidate witnesses, interfere with evidence or publish material in a way that risks harm or procedural unfairness. This does not prevent a person from seeking confidential advice, support, legal advice, union representation, medical assistance or reporting to the police or regulator.

12 Formal investigation and decision-making protocol

12.1 Initial case assessment

Within five working days of a formal report, VSBT will normally appoint a case manager to confirm the issues, identify the appropriate student or staff route, assess conflicts of interest, agree communication arrangements and explain the process, support, indicative timescales and possible outcomes.

A case may proceed without a formal complaint where there is reliable information indicating a serious or wider risk. The reporting party's views and wellbeing will be considered and reasons for the decision recorded.

12.2 Investigation

An investigator with appropriate training and no material conflict of interest will gather relevant evidence, interview parties and witnesses, and prepare a factual report. The investigator will distinguish evidence, undisputed facts and matters in dispute, and will not make a disciplinary decision unless the procedure expressly appoints them as the decision-maker.

The parties will receive sufficient detail of the allegations or concerns to participate fairly, have a reasonable opportunity to provide evidence and respond to relevant adverse material, and may identify witnesses or lines of enquiry. Disclosure may be redacted or summarised where necessary to protect privacy or safety, provided fairness is maintained.

The investigation will normally be completed within 30 working days. Where complexity, criminal proceedings, availability of participants, accessibility needs or other justified factors require more time, the case manager will explain the reason, revised timetable and next update. Updates will normally be provided at least every 10 working days while a delay continues.

12.3 Decision-making and hearing

Where there is a case to answer, the matter will be referred to an impartial decision-maker or panel under the applicable student or staff disciplinary procedure. Panel members will be appropriately trained and free from reasonable perceptions of bias. The reporting



and responding parties will not be required to question one another directly; relevant questions may be put through the chair or investigator.

The decision-maker will determine facts on the balance of probabilities: whether it is more likely than not that the alleged conduct occurred. The criminal standard of proof does not apply to internal proceedings. The seriousness of an allegation does not change the standard, but findings must be supported by cogent and reliable evidence.

A decision will normally be issued within 15 working days after the decision-maker receives the completed investigation material or hearing concludes. The written record will explain the findings, reasons, relevant evidence, any action or sanction, and the route and deadline for review or appeal.

13 Allegations that may constitute a criminal offence

13.1 A person will not be pressured to report to the police. VSBT will provide information about options and specialist support. In an emergency or where a child, adult at risk or another person faces a serious risk, VSBT may contact emergency services or safeguarding authorities without consent where lawful and necessary.

13.2 VSBT may conduct an internal risk assessment and take precautionary action regardless of whether a police report is made. It will consider whether an internal investigation should proceed, be limited or be paused to avoid prejudicing a criminal investigation or compromising fairness.

13.3 Police decisions not to investigate, charge or prosecute do not prevent VSBT from considering the matter under its own procedures. Conversely, a criminal conviction may be relied upon as evidence subject to fairness and the applicable procedure.

13.4 VSBT will preserve relevant records and cooperate lawfully with police, courts, safeguarding bodies and regulators, while limiting disclosure to what is necessary and proportionate.

14 Precautionary and interim measures

14.1 Precautionary measures are neutral, risk-based and temporary. They are not a finding of misconduct or a disciplinary penalty. Measures may be applied to any party where necessary and proportionate to protect safety, wellbeing, evidence or the integrity of the process.

14.2 Measures may include no-contact directions, changes to timetables or groups, alternative teaching or assessment arrangements, restricted access to premises or systems, changes to placement or supervision, temporary remote study, suspension from specified activities, or staff duty changes.

14.3 Before imposing a significant restriction, VSBT will normally invite representations unless urgent action is necessary. The person affected will receive reasons and a review route. Measures will be reviewed regularly, normally at least every 20 working days, and adjusted or removed when no longer justified.

15 Outcomes, sanctions, communication and appeals

15.1 Possible student outcomes include no further action, informal management with consent where appropriate, behavioural requirements, training, warning, restrictions, suspension, exclusion from activities, termination of placement, expulsion or referral to a partner or professional body. Staff outcomes may include management action, training, warning, reassignment, suspension, dismissal or referral to a regulator or professional body.

15.2 Sanctions will be proportionate and will consider seriousness, impact, intent where relevant, abuse of power, vulnerability, repeated conduct, retaliation, insight, mitigation, previous relevant findings and the need to protect the community.

15.3 Each person directly affected by a decision will be informed directly and promptly of the decision and sufficient reasons to understand it. Information shared with each party may differ to protect personal data, but will not be so limited that the person cannot understand the outcome, safety measures or their review rights.

15.4 A responding student or staff member may appeal under the applicable disciplinary procedure on specified grounds such as procedural irregularity, material new evidence, reasonable perception of bias, unreasonable findings or disproportionate sanction. A reporting student may request a review of the College's handling, support, risk management or communication and, where the procedure permits, a relevant outcome decision.

15.5 Appeals must normally be submitted within 10 working days of the decision. VSBT will normally issue an appeal outcome within 20 working days. Where a student has completed VSBT's internal process, the College will issue a Completion of Procedures Letter and explain any right to complain to the Office of the Independent Adjudicator for Higher Education.



16 Roles and responsibilities

Role	Key responsibility
Board of Directors / College Oversight Board	Provides strategic oversight, assures adequate capacity and resources, and receives annual assurance on compliance, risk and effectiveness.
Academic Board	Approves the policy, oversees student-facing academic implications, receives thematic reports and monitors institutional learning.
Principal	Is accountable for implementation, ensures conflicts are managed, and authorises serious institutional or external escalation.
Head of Student Services / Designated Safeguarding Lead	Owns the policy operationally, coordinates support and risk assessment, maintains reporting routes and ensures safeguarding action.
Head of Quality & Academic Governance	Assures alignment with OfS requirements, monitors implementation, supports annual review and maintains controlled versions.
HR lead	Manages staff disclosures and staff disciplinary or grievance processes, including the duty to prevent workplace sexual harassment.
Case manager	Coordinates each case, communications, support, risk review, timescales and records, while remaining separate from the decision where practicable.
Investigators and decision-makers	Undertake fair, impartial and evidence-based processes within their authority and training.
Programme leaders, tutors and professional staff	Promote awareness, receive disclosures appropriately, refer promptly and implement agreed academic or practical measures.
All students and staff	Maintain expected standards, complete required training, report serious risks appropriately, respect confidentiality and cooperate honestly with processes.
Partners and contractors	Comply with contractual expectations, provide safe reporting routes, cooperate with investigations and protect students from retaliation.

17 Training, awareness and competence

17.1 New students will receive mandatory training during induction and all students will be required, at registration at the start of each year of study, to confirm that they have been appropriately informed about this Policy and Procedures document, expected behaviour, reporting routes and available support. VSBT requires student training to be mandatory, while providing reasonable adjustments, trauma-sensitive alternatives or other appropriate arrangements for individual students who have good reasons not to participate in a particular format.

17.2 All staff will receive induction and periodic refresher training. Staff with responsibilities for disclosures, support, investigation, decision-making, appeals, safeguarding, HR or security will receive specialist role-specific training and regular updates.

17.3 Training will cover behaviour that may constitute harassment or sexual misconduct, consent, professional boundaries, trauma-aware communication, fair process, natural justice, confidentiality, data protection, equality, safeguarding, freedom of speech principles and appropriate support for all parties.

17.4 VSBT will evaluate participation, understanding, confidence and impact. Training content and delivery will be reviewed using evidence, student feedback, case learning and changes in law or regulation.

18 Monitoring, data, evaluation and governance assurance

18.1 VSBT will maintain secure case records and a confidential central register sufficient to monitor reports, risks, support, timescales, outcomes, appeals and implementation of actions. Access will be restricted to authorised personnel.

18.2 At least annually, anonymised and aggregated information will be reviewed to identify patterns, barriers to reporting, differential experiences, delays, recurring locations or activities, training needs and the effectiveness of preventive measures. Small numbers will be suppressed or combined where necessary to avoid identification.

18.3 Evaluation will consider more than report numbers. It may include student surveys, focus groups, training evaluation, complaints, safeguarding data, partner information, external sector evidence and feedback from persons who have used the process.



18.4 The Head of Student Services and Head of Quality & Academic Governance will provide an annual assurance report to Academic Board and the Board of Directors / College Oversight Board. Serious or systemic risks will be escalated promptly through the Risk Management Framework.

18.5 VSBT must ensure sufficient financial, staffing and specialist resources for support, case management, investigation and decision-making. External expertise may be commissioned, but VSBT remains accountable for compliance and fairness.

19 Publication, prominence and version control

19.1 This policy will be published in a prominent, easily accessible position on the public VSBT website without password or security restrictions. The webpage will clearly state that it contains VSBT's policies and procedures for preventing and addressing harassment and sexual misconduct, reporting incidents, accessing support, and managing staff-student relationships.

19.2 A clear and easy-to-understand statement about the existence of this single comprehensive source, the nature of its content and how to access it will be communicated directly in writing to all students and staff at least once each calendar year. The same statement will be included in VSBT's main documents used to promote its higher education services, including the prospectus and equivalent promotional information, and in documents that provide collections of rules, policies and procedures for students and staff, including the Student Handbook and Staff Handbook. Offer and enrolment information will also signpost the source where relevant to the student journey.

19.3 Historical versions will remain easily accessible from, or directly linked through, the same public E6 webpage for as long as they remain relevant to current or former students, complaints, investigations, appeals or other ongoing matters. Each version will display its status, effective date, approval route, review date and a transparent summary of changes. The version applicable at the time of an incident or procedural step will be identified and applied fairly, subject to law and regulatory requirements.

19.4 Reporting routes and support contacts will be tested periodically. A policy is not considered operational merely because it has been published; VSBT must act consistently with its stated procedures.

20 Freedom of speech and academic freedom

20.1 VSBT will implement this policy consistently with freedom of speech within the law and academic freedom. It will place significant weight on lawful expression, tolerance of controversial views and the educational context.

20.2 There is a rebuttable presumption that students' exposure to course materials, or statements and views expressed as part of teaching, research or discussion connected with course content, is unlikely to amount to harassment. This presumption may be rebutted where the facts and law demonstrate otherwise.

20.3 Lawful disagreement, criticism, debate or academic challenge will not be treated as misconduct merely because it is unpopular or causes offence. This protection does not extend to sexual misconduct, threats, unlawful harassment, targeted intimidation, coercion or conduct outside lawful speech.

21 Equality, accessibility and reasonable adjustments

21.1 Sexual misconduct can affect any person regardless of sex, gender, gender reassignment, sexual orientation, relationship status, age, disability, race, ethnicity, nationality, religion or belief, pregnancy or maternity, socio-economic status or other background. VSBT will respond without stereotypes or assumptions.

21.2 The College will identify and remove barriers to reporting and participation. Reasonable adjustments may include alternative communication methods, breaks, remote attendance, interpretation, accessible documents, a supporter, modified questioning or adjusted timescales where fairness is maintained.

21.3 VSBT will consider intersectional and differential impacts, including those affecting disabled students, international students, apprentices, commuting students, LGBTQ+ students, students with caring responsibilities, students in placements and students who may fear cultural, family, immigration or financial consequences.

22 Protection from retaliation and misuse of the procedure

22.1 Retaliation, victimisation, intimidation, witness interference or breach of a protective measure is prohibited and may result in separate disciplinary action. Concerns about retaliation should be reported immediately through any route in section 8.

22.2 A report made in good faith will not attract disciplinary action merely because it is not upheld or evidence is insufficient. A report may be considered malicious only where there is reliable evidence that a person knowingly fabricated a material allegation or acted with a dishonest purpose. A mistaken account, inconsistency, delayed report or inability to prove an allegation is not, by itself, evidence of malice.



22.3 VSBT may take action where a person deliberately misuses the procedure, falsifies evidence, breaches confidentiality to cause harm, or obstructs a fair investigation. Any such allegation will itself be considered fairly and separately.

23 Policy review

23.1 This policy will be reviewed at least annually and earlier where required by a change in law, OfS requirements, OIA guidance, safeguarding practice, institutional structure, student profile, risk evidence or case learning.

23.2 The review will include student input and an assessment of whether the policy and associated measures are making a significant and credible difference. Substantive revisions will follow the approved governance route and be communicated transparently.

Appendix A - Quick reporting and response guide

Situation	What to do
Immediate danger	Call 999. Move to a safe place if possible. Seek urgent medical help where required.
Need specialist sexual assault support	Use the NHS SARC finder or call NHS 111 for urgent medical advice. You do not have to report to the police to access a SARC.
Want confidential VSBT support	Speak to Student Services, Registry, the Designated Safeguarding Lead, a tutor or another trusted staff member.
Want to report in writing	Use the confidential reporting email address published on the VSBT E6 webpage, use the public online Incident Report Form, or write to the Head of Student Services. Until a separate dedicated mailbox is configured, reports may be sent to info@vsbt.co.uk with "Confidential - Harassment/Sexual Misconduct Report" in the subject line.
Want to report anonymously	Use the anonymous option on the online Incident Report Form. Explain as much as you safely can; anonymous reporting may limit individual action.
Concerned about retaliation or contact	Tell the case manager or any reporting contact immediately. VSBT can consider no-contact directions, timetable changes and other protective measures.

Appendix B - Illustrative examples of sexual misconduct

The following examples are illustrative rather than exhaustive. Context, consent, purpose, effect and power relationships will be considered in every case.

Category	Examples
Verbal and written	Sexual comments, jokes, rumours, propositions, intrusive questions, repeated invitations after refusal, explicit messages or comments about a person's body or sex life.
Non-verbal and visual	Sexual gestures, staring, leering, exposure, displaying sexual material, sending sexual images or creating/sharing intimate or synthetic images without consent.
Physical	Unwelcome touching, hugging, kissing, groping, blocking movement, sexual assault, rape, attempted assault or physical intimidation of a sexual nature.
Digital and online	Cyberstalking, sexualised contact through social media or learning platforms, image-based abuse, location tracking, impersonation or threats to publish intimate material.
Coercive and exploitative	Pressure, manipulation, grooming, spiking, threats, blackmail, abuse of dependency, or offering grades, references, employment, funding, access or opportunity in return for intimacy.
Relationship-related	Harassment or sexual misconduct within a current or former relationship, coercive control, retaliation after rejection or relationship breakdown, or breach of the staff-student relationship prohibition.
Third-party and off-campus	Misconduct by a placement supervisor, contractor, visitor or member of the public, or conduct at accommodation, travel, social events or online that affects a VSBT student.



Appendix C - External support and emergency contacts

External services are independent of VSBT. Contact details may change; the linked official websites should be checked for current information.

Service	Contact	Purpose	Link
Emergency services	999	Immediate danger, urgent police or ambulance response.	Open
Police non-emergency	101	Non-emergency police advice or reporting.	Open
NHS 111	111	Urgent medical advice where the situation is not life-threatening.	Open
NHS Sexual Assault Referral Centres	Online finder	Free specialist medical, practical and emotional support after rape or sexual assault. Police reporting is not required to access a SARC.	Open
Rape Crisis England & Wales	0808 500 2222	Free 24/7 Rape & Sexual Abuse Support Line and online chat for people aged 16 and over.	Open
Samaritans	116 123	Free emotional support at any time.	Open
Office of the Independent Adjudicator	Online information	Independent review after completion of an eligible student complaint or appeal process.	Open

Appendix D - Version history

Version	Date	Summary of change	Prepared/reviewed by	Status
1.0	April 2026	First approved VSBT edition establishing the institutional framework for prevention, reporting, support, investigation, staff-student relationships, monitoring and governance assurance.	Quality Assurance and Student Services	Approved
1.1	September 2026	Condition E6 compliance enhancement following regulatory review: retitled as the single comprehensive source; clarified E6 effective dates; strengthened authoritative-source and prominence provisions; aligned the staff-student relationship prohibition with the E6 ban definition; strengthened annual mandatory student training, historical-version access and confidential reporting controls; and clarified the E6 definition of students.	Quality Assurance and Student Services	Draft for approval

END OF POLICY