

HARASSMENT, BULLYING AND SEXUAL MISCONDUCT POLICY AND PROCEDURE

This procedure is applicable to all VOGUE College of Fashion students registered with the University of Buckingham

Introduction, Purpose and Scope

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

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

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

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

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

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

providing a positive study experience for all its students.

8. All students and staff have a right to complain if they believe that they are being, or have been, subjected to unacceptable behaviour whilst studying at the College, either in person or remotely.
9. Below is a list of other policies which are allied with this policy and are accessible on our [website](#) and on Canvas; these may as required apply alongside this policy, supersede or instigate this policy:
 - Policy on Intimate Personal Relationships between Staff and Students
 - Non-Academic Misconduct Policy
 - Student Code of Conduct
 - Student Complaints Procedure
 - Safeguarding Policy
 - Academic Freedom and Freedom of Speech Policy
 - Fitness to Study Policy
 - Equal Opportunities Policy and Non-Discrimination Policy

Definitions and examples of breaches of this policy

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

Harassment

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

Bullying

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

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

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

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

Sexual Misconduct

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

Victimisation

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

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

Roles and Responsibilities

24. VOGUE College is committed to preventing incidents of bullying, harassment or sexual misconduct (including sexual harassment) where reasonably possible, and to provide educational and preventative training programs regarding such behaviours. The College also commits to make available timely support for those who have been affected by such behaviours, and to provide prompt and equitable methods of investigation and resolution to stop bullying, harassment and sexual misconduct, to remedy any harm, and to prevent its recurrence.
25. All staff and students have a responsibility to ensure a working and studying environment where everyone is treated with equal respect and dignity. Each member of staff and each student is expected to contribute to preventing unacceptable behaviours, including harassment, bullying or sexual misconduct (including sexual harassment) through self-awareness; and by modelling positive behaviour for others, and raising any concerns.
26. VOGUE College staff are in a position of trust. It is important that exemplary behaviour is demonstrated. It must be remembered that actions can be misinterpreted by others, no matter how well intentioned. Due consideration should always be given as to what is an appropriate environment and what is appropriate conduct in relation to the activities which are being undertaken.

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

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

Staff and student personal relationships

28. VOGUE College prohibits all intimate personal relationships between all College staff and all higher education students. There is the potential for abuse in such

relationships where individuals are in inherently unequal positions. Due to the potential for conflict of interest, exploitation, favouritism or bias, such relationships may undermine the integrity of student and staff work or may have adverse effects on the working and learning environment for those directly involved, as well as for the broader institutional culture.

29. An exception to this is where there is a pre-existing intimate personal and/or family relationship (family including relationships by marriage). These are permitted and are subject to a case-by-case risk assessment to determine whether any potential or actual conflict of interest exists, on the basis of which preventive measures may be put in place. Staff have an obligation to disclose such relationships.
30. Students on a placement in an external organisation must adhere to any policies on personal relationships within the external organisation. In the absence of a policy in the external organisation students must continue to follow this policy and should not enter into close personal and intimate relationships with their placement supervisors.
31. For further details about VOGUE College's approach to managing staff-student relationships, please see Policy on Intimate Personal Relationships between Staff and Students, available both on Canvas and on our [website](#).

Data processing, confidentiality and record keeping

32. It is essential for all of those involved in informal and formal complaints procedures to maintain appropriate confidentiality, as cases relating to harassment, bullying, sexual misconduct and victimisation may be of an extremely sensitive nature. However, if a student names another member of the College and wishes the College to take action, then the person(s) named will normally have the right to know the complaint made against them, including the name of the reporting party, in order to be able to reply to the complaint. If the reporting party refuses to name a person who is relevant to their complaint, the College may not be able to consider or investigate the case or may only be able to consider or investigate it to a limited extent.
33. Once an individual has raised allegations or a complaint that falls within the scope of this policy, records will be held confidentially and only strictly as necessary on the relevant student files. In accordance with the VOGUE College duties under the General Data Protection Regulation⁸ and the Data Protection Act 2018⁹ and in keeping with OIA recommendations, records will be retained for a minimum of 15 months and for no longer than is reasonably necessary (i.e. no longer than 6 years after the final action on the student's case, at which point the individual student file will be destroyed). Some deviation from this schedule can be expected for cases which, in the judgement of the College, are unique or complex and therefore require shorter or longer record retention periods.

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

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

34. As part of the fair and proper management of action under this policy, personal, 'special category' data and criminal records data may be shared as necessary, in order to investigate and resolve matters. All such information will be treated confidentially and will be disclosed only to those individuals who need to see such data for the purposes of undertaking an investigation, determining or recommending a resolution, or deciding what other appropriate steps can be taken. In raising a formal complaint/allegation under this policy, individuals will be asked to indicate that they consent to their data being shared appropriately.
35. Any individuals involved in any part of the process – either in relation to those seeking support or those submitting a complaint – must keep information that is disclosed to them confidential. Any unauthorised disclosure of confidential information will be considered a policy violation and will be addressed accordingly.
36. Where an individual submits evidence in support of complaints or allegations raised that fall within the scope of this policy, and that evidence constitutes third party personal information, the Preliminary Enquiry Officer will need to notify the third party that their data is being processed, in accordance with Article 14 of the GDPR¹⁰.

Raising a complaint or allegations

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

Anonymous Disclosure

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

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

Informal Resolution

41. It may be appropriate to use a Local Informal Resolution in order to resolve concerns swiftly and effectively at the point at which a concern is raised, or as close to that point as possible; the College aims to address any informal concerns raised within 3 working days.
42. Students should raise any concerns immediately and there are a number of individuals they might approach, including their Programme Director, or the Registrar, with the aim of resolving the issue directly and informally. If the complaint relates to a member of faculty or staff, students may approach the Head of Human Resources. In order to raise a concern, students may choose to use the Disclosure of Misconduct Form (see Appendix 2).
43. If a student, or a member of staff is approached and told that their behaviour could be construed as bullying, harassment or sexual misconduct, they should be prepared to listen patiently and calmly. Whilst it may be upsetting, they should allow the student or colleague to express their concerns, and if appropriate, try to reach common ground to remedy the situation and allow a positive working/learning relationship to be resumed. If the nature of the complaint is serious or inappropriate, the student or staff member should speak with their line manager or supervisor to agree the next steps.
44. Where a student concern has been resolved locally, the member(s) of faculty or staff involved will communicate the resolution to the student. For concerns raised by staff members, it will be their line manager.

Formal Procedure

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

misconduct will be appropriately trained by specialist external training providers who are experts in equipping higher education institutions to safeguard, and prevent and respond effectively to sexual violence, harassment and abuse.

Outcome of a Formal Student Complaint/ Disciplinary Case

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

Police Investigations and Judicial Proceedings

57. Where criminal investigations and/or judicial proceedings are ongoing or are likely to commence in respect of a disclosure or report, VOGUE College will usually continue its own investigation and any disciplinary action, subject to the circumstances of the case and police advice.
58. Where, following police advice or otherwise, the College decides not to undertake its own investigation until the case has concluded, the College reserves the right to review this decision and to initiate its own investigation and/or disciplinary action at a later stage in or on completion of the criminal investigation and/or judicial proceedings.
59. A decision by the Police or Crown Prosecution Service (or other law enforcement agency) to take no further action in relation to a criminal matter, or an acquittal at a trial, does not preclude or negate the outcome of the College's investigation and/or disciplinary action.
60. An internal investigation is focused exclusively on whether a breach of the Bullying, Harassment and Sexual Misconduct policy and/or other applicable obligations or policies has occurred. The internal process may therefore be considering different issues from a police investigation or criminal prosecution. This is why it may, depending on the circumstances, be possible to proceed with an internal investigation at the same time as a criminal process. Any judgements reached as part of an internal investigation do not constitute a legal ruling on whether or not criminal activity has taken place.
61. Where a student or staff member is convicted of a criminal offence or accepts a police caution in relation to behaviour that falls within the scope of this policy, they must declare this to the College. The conviction/caution will be taken as conclusive evidence that the behaviour took place, and no further investigation shall be required by the College. Appropriate disciplinary measures may be taken (if they have not already).

Interim Measures

62. Following a report, or a disclosure that requires an investigation the College may determine it necessary to introduce interim measures. An Interim Measures Panel (IMP) may assess support needs, consider how to protect the interests of all parties and members of the College community who may be impacted by the case, and agree to next steps. This will be achieved through a robust risk assessment to consider the academic, welfare and support needs of the parties, and any interim measures necessary to ensure a fair and transparent investigation, where appropriate.
63. Any interim measures will be proportionate to the nature of the risk(s) being managed. Interim measures may include alternative working arrangements, provision of support, or a recommendation to partially or fully suspend an employee or student during this time and will be recommended by the panel in accordance with the College's policies and procedures.

64. The Chair of the Interim Measures Panel will be Global Academic Director, or their Deputy.
65. The composition of the Interim Measures Panel will depend on the nature of the allegations and the parties involved, e.g. between students, or between a student and a staff member. There will be four members, including the Chair, and it will comprise of:
 - A member of the Safeguarding Team
 - A senior academic from a trained pool
 - A representative of the Quality Team
 - Global Academic Director, or their Deputy (Chair)
66. The Chair of the panel will ensure that members have received appropriate training and that where possible, the panel is diverse and reflects any relevant protected characteristics.
67. The membership of the panel will be shared with the reporting party in advance of the meeting to ensure transparency and to manage any conflicts of interest.
68. The risk assessment and any interim measures that are put in place will be shared to both parties and will be reviewed regularly by the IMP and amended as appropriate.
69. All information disclosed as part of this process will be treated confidentially and sensitively and in accordance with data protection legislation.

False, Bad Faith or Misleading Allegations

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

Right to withdraw a complaint/allegations

71. Where the reporting party expresses that they do not wish to engage with the procedures under this policy or another College procedure, they are under no obligation to engage with any such procedures. The reporting party also has the right at any point in proceedings to change their mind about whether or not they prefer any action to be taken. As far as possible, the College will proceed in accordance with the wishes of the reporting party; however, there may be circumstances where reporting party wishes no action to be taken, but the College has an obligation to pursue action (e.g. in the event of serious safeguarding concerns and/or risks). The decision therefore as to whether any action should be initially taken or should continue rests with the College, and action may proceed or continue to proceed without the engagement of the reporting party.

72. The reporting party may withdraw a complaint or allegations at any time whilst procedures have begun either under this policy or another policy (e.g. the Non-Academic Misconduct Policy), by notifying the appointed officer of the College who is operating the relevant stage of the procedure, in writing, of their decision. They do not have to provide any reason(s) for a decision to withdraw a complaint or allegations.

Use of Non-Disclosure Agreements (NDAs)

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

Freedom of Speech

74. VOGUE College is committed to the principles of academic freedom, freedom of speech, and expression. It fosters an environment where all its students and staff can participate fully in the life of their school, and where everyone feels confident and able to research, question and test received wisdom, and to express new ideas and controversial or unpopular opinions, without fear of isolation, marginalisation or discrimination. The College believes that all staff and students should have the right to speak freely, without fear of disciplinary action or any other sanction, provided they do so lawfully, without malice and in the public interest.
75. With this in mind, we believe that the exposure of students to course materials, and statements made and views expressed by a person as part of teaching, research or discussions about any subject matter that is connected with the content of their course, are unlikely to constitute harassment.

Advice and Support

76. VOGUE College is committed to providing support for members of its community affected by these issues. If you believe that you are being harassed, there are a number of options to consider. Each case will be different and is dependent on the individual person's circumstances. Students are advised to seek advice from a member of faculty or staff at the College. You are advised to act promptly and should not feel the unwanted behaviour is your fault, or that you have to wait until the situation is intolerable. Please contact the Registrar on dhyland@voquecollege.com

77. Information about available support is also outlined in Appendix 3, which lists external support providers, as well as Appendix 4, with guidance for students and staff on what to do following a rape or sexual assault. Support resources are available to any member of the College who discloses an incident, regardless of whether they choose to make a report to the College and/or police. Staff at the College who receive a report or disclosure should direct the reporting party to the support available. The College will also offer individual support measures as appropriate to both the reporting and responding parties, whether internally or externally, and witnesses involved in formal complaints.
78. All employees can seek confidential support and advice from HR should they be experiencing or witnessing any sexual misconduct and/or sexual harassment in the workplace or have concerns about a colleague who is. HR can advise on potential next steps and signpost options for emotional and practical support as needed. Confidential counselling is available to all employees through BrandEd's Employee Assistance Programme (EAP) helpline, provided by Health Assured.

Review of Policy and reporting to the Governing Body

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

Title	Harassment, Bullying and Sexual Misconduct Policy and Procedure
Date first implemented	N/A
Approving body	Governing Body
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