



LEARNER HARASSMENT AND BULLYING PROCEDURE

Reaseheath College and University Centre

Purpose of this procedure

This procedure sets out how Reaseheath College and University Centre prevents, identifies, records, assesses and responds to learner harassment and bullying. It provides a clear framework for staff to act promptly, safeguard learners, preserve evidence, support those affected, investigate concerns fairly, communicate outcomes appropriately and monitor patterns so that future harm can be reduced.

Staff Quick Guide: Key Actions

Use this guide when a learner reports, discloses or appears affected by bullying, harassment, intimidation, discrimination, online abuse or targeted behaviour.

Action	What staff must do
1. Listen	Take the concern seriously. Listen calmly and do not promise confidentiality.
2. Check safety	If there is immediate risk of harm, contact the Safeguarding Team immediately.
3. Preserve evidence	Ask the learner not to delete messages, images or posts.
4. Record	Complete the College Safeguarding Concern Form the same working day so the concern is routed to the Safeguarding Team for review and triage.
5. Refer for triage	The Safeguarding Team reviews and triages reports received through the Safeguarding Concern Form. Student Services and relevant managers are involved where a conduct, welfare or support response is required.

Escalate immediately to the Safeguarding Team where there is: immediate risk of harm; sexual harassment or misconduct; hate-related or discriminatory behaviour; threats, coercion or exploitation; serious online abuse; criminal behaviour; or residential safety concern.

Key timescales: Record same working day → Triage within 24 working hours → Investigation within 3 working days → Outcome normally within 10 working days.

Timescales may need to be extended if referred to the Police.

1. Procedure, Scope and Purpose

1.1 Reaseheath College and University Centre (the College) is committed to ensuring that all learners, staff and any other parties on College premises are kept safe and provided with an environment in which everyone is treated with dignity and respect.

1.2 The College will take all necessary steps to challenge and prevent discrimination, harassment and bullying of any kind. Any inappropriate behaviour that may cause offence, whether intentional or not, will be treated seriously. All learners should feel confident that reported incidents of harassment and bullying will be dealt with promptly, fairly, effectively and sensitively.

1.3 The aim of this procedure is to prevent harassment and bullying from occurring and, where concerns arise, to ensure that there are clear arrangements to respond, investigate, support learners, prevent recurrence and monitor wider themes.

1.4 Harassment and bullying are unacceptable behaviours and are contrary to the College aim of promoting an environment where learners, staff, visitors and contractors are treated with dignity and respect.

1.5 Any act of harassment or bullying may lead to disciplinary proceedings and/or investigation by the College. Everyone at the College has a duty to promote a culture free from unacceptable behaviour and to respond appropriately to concerns.

1.6 The College has duties under health and safety legislation, safeguarding legislation and equality legislation. Some behaviours may also constitute criminal offences or require referral to external agencies.

2. Definitions

2.1 Harassment

2.1.1 Harassment is unwanted conduct which has the purpose or effect of violating a learner's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It may be directed at an individual or group, may be obvious or subtle, and may occur as a single serious incident or as part of a pattern of behaviour.

2.1.2 Harassment may relate to a protected characteristic, including age, disability, sex, race, religion or belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity. It may also relate to appearance, background, learning need, health, social circumstances, association with others, or any other personal characteristic. The College will not tolerate harassment, bullying, discrimination or victimisation in any form.

- **Physical harassment:** unwanted physical contact, assault, threatening gestures, intimidation, blocking movement, damage to personal property or aggressive behaviour.
- **Verbal harassment:** unwelcome comments, insults, slurs, jokes, banter, ridicule, malicious gossip, threats or remarks relating to personal characteristics, appearance, identity or background.
- **Non-verbal harassment:** offensive gestures, staring, exclusion, isolation, hostile body language, display of offensive materials, graffiti, images or symbols.
- **Written or digital harassment:** letters, emails, messages, social media posts, group chat content, images, audio, video, impersonation, anonymous posts or other online material intended or likely to cause harm, fear, humiliation or exclusion.
- **Sexual harassment and sexual misconduct:** unwanted conduct of a sexual nature, including sexualised comments, jokes, gestures, pressure, intrusive questions, image-based abuse, sharing or

threatening to share nude or semi-nude images, sexual rumours, coercive behaviour, inappropriate touching or behaviour that creates a hostile, intimidating or offensive environment.

- **Harmful sexual behaviour:** sexual behaviour which is developmentally inappropriate, harmful, coercive, exploitative or abusive. Harmful sexual behaviour may overlap with harassment, bullying or misconduct, but it must always be treated as a safeguarding concern and referred to the Safeguarding Team in line with safeguarding procedures.

2.2 Bullying

2.2.1 Bullying is a particular form of personal harassment. It can be persistent, threatening, offensive, abusive, intimidating or insulting behaviour. It may involve an abuse of power, position, knowledge, social influence or group behaviour.

2.2.2 Bullying may happen in public or private, on campus, in residential settings, online, during work placements, travelling to or from College, or in any context that affects a learner's safety, wellbeing, education or participation in College life.

- Consistently undermining someone.
- Shouting, sarcasm, ridicule or humiliating comments.
- Derogatory or belittling remarks about personal attributes, protected characteristics, learning needs, appearance or background.
- Unwarranted exclusion, isolation, victimisation or group targeting.
- Threats, intimidation, coercion, pressure or controlling behaviour.
- Online abuse, sharing images without consent, impersonation, anonymous messages or hostile group chats.

2.2.3 Bullying and harassment can be subtle and may not be obvious to others. Incidents that appear isolated may form part of a wider pattern. Staff should therefore record concerns carefully and avoid dismissing reports as minor conflict without assessment.

2.3 Safeguarding and child-on-child abuse

2.3.1 Some incidents of bullying or harassment may also constitute child-on-child abuse or raise wider safeguarding concerns. This may include sexual harassment, sexual violence, harmful sexual behaviour, image-based abuse, coercive or controlling behaviour, abuse within intimate personal relationships, threats, exploitation, initiation or hazing behaviour, and serious online abuse.

2.3.2 Where any safeguarding indicator is present, staff must refer the concern to the Safeguarding Team immediately and follow the Safeguarding Children and Young People Policy and associated procedures. The matter may still also be considered under this procedure, the Student Conduct Policy and Procedure, or both, but safeguarding considerations take priority.

3. Responsibilities

3.1 All Staff

- Take all allegations, disclosures and concerns regarding bullying or harassment seriously.
- Listen to learners and provide reassurance.
- Assess whether there is any immediate risk of harm.
- Avoid promising confidentiality; explain that information may need to be shared to keep people safe.

- Preserve evidence where available, including screenshots, messages, images, CCTV information and witness details.
- Record the concern using the Safeguarding Concern Form, or by emailing safeguarding@reaseheath.ac.uk before the end of the working day, so that it is received by the Safeguarding Team for review and triage. Where there is an immediate risk of harm, staff must contact the Safeguarding Team immediately and complete the Reporting Form as soon as possible thereafter.
- Contact the Safeguarding Team immediately where there are concerns relating to sexual harassment, hate incidents, discrimination, exploitation, threats of violence, coercive behaviour, online abuse, criminal behaviour or risk of harm, and ensure the concern is also submitted through the Safeguarding Concern Form.
- Support learners appropriately throughout the process.

3.2 Progress Coaches

- Provide ongoing pastoral support to learners.
- Contribute relevant information to investigations where required.
- Monitor learner welfare following interventions or outcomes.
- Participate in review meetings where appropriate.
- Support learners to understand expectations within the Student Charter and relevant codes of conduct.

3.3 Safeguarding and Student Services

- Lead the initial receipt, review and triage of concerns submitted through the College Safeguarding Concern Form or safeguarding contact routes.
- Assess immediate and ongoing risk.
- Determine whether matters should be managed as a behaviour conflict, behaviour concern, bullying or harassment concern, safeguarding concern, or a combination of these.
- Allocate investigations or confirm the most appropriate pathway following safeguarding triage.
- Maintain oversight of support arrangements for reporting learners, witnesses and learners whose behaviour is being reported.
- Maintain a central register of bullying and harassment concerns.

3.4 Investigating Manager

- Conduct a fair, impartial and proportionate investigation.
- Meet with relevant parties and obtain statements.
- Gather and review available evidence.
- Consider safeguarding, equality, disability, online safety, residential and curriculum implications.
- Record findings and rationale for decisions.
- Recommend support, restorative action, behaviour interventions or disciplinary action as appropriate.

3.5 Curriculum Leaders and Heads of Department

- Ensure actions arising from investigations are implemented effectively.
- Support the investigation process where curriculum information is required.
- Monitor repeat incidents and emerging themes within their areas.
- Escalate concerns where patterns or risks indicate the need for wider intervention.

3.6 Residential Staff Responsibilities

- Monitor behaviour within accommodation.
- Respond promptly to welfare concerns.
- Maintain visibility and supervision during evenings and weekends.
- Escalate concerns promptly through the College Safeguarding Concern Form, or immediately to the Safeguarding Team where there is risk of harm, so that residential incidents are included in central triage.
- Participate in review meetings.
- Maintain residential welfare records.

4. Recognising Bullying and Harassment

Staff should not attempt to make a final judgement at the point of disclosure. The purpose of the initial response is to listen, record, preserve evidence and refer the matter for appropriate assessment.

4.1 Staff Decision Guide

Indicator	Yes / No
Is the behaviour unwanted by the learner?	
Has the behaviour happened more than once, or is there evidence that it may continue?	
Is a learner being targeted by an individual or group?	
Is there a real or perceived power imbalance?	
Has the behaviour caused fear, distress, humiliation or harm?	

Decision point

Where two or more indicators are present, the concern should normally be treated as potential bullying and referred for assessment. Where behaviour involves protected characteristics, sexual misconduct, hate incidents, threats, exploitation, discrimination or safeguarding concerns, staff must follow safeguarding procedures regardless of repetition.

5. Procedure for Dealing with Reports of Harassment or Bullying

Learner Harassment and Bullying Response Workflow

Operational principle

Any member of staff should be able to identify what to do immediately, what to record, who to inform, and what should happen next within the first 24 working hours.

STEP 1 - RECEIVE

Any member of staff

Listen, reassure, take seriously, do not promise confidentiality, assess immediate safety, preserve evidence.



IMMEDIATE SAFETY DECISION

Is anyone at immediate risk of harm?

YES: refer immediately to Safeguarding.

NO: continue to recording.



STEP 2 - RECORD

Same working day

Complete the College Safeguarding Concern Form so the concern is routed to the Safeguarding Team for review and triage; capture learner voice, witnesses and evidence.



STEP 3 - TRIAGE

Within 24 hours of receipt

The Safeguarding Team reviews and triages the report. Student Services and relevant managers are involved where a conduct, welfare or support response is required. In combined cases, a named lead and rationale must be recorded.



STEP 4 - INVESTIGATE

Commence within 3 working days

Allocated manager gathers statements, reviews evidence, considers safeguarding and equality implications, and records decision-making.



STEP 5 - OUTCOME

Normally within 10 working days

Outcome recorded and communicated appropriately. Actions may include support, restorative intervention, behaviour measures or disciplinary action.



STEP 6 - REVIEW

2 weeks and 6 weeks

Attendance and Behaviour Officer, Progress Coach, Residential staff or other nominated lead to check that behaviour has ceased, support is effective, and no further intervention is required.

Triage principle: All bullying, harassment, sexual misconduct, hate-related, discriminatory or safeguarding concerns must be submitted through the College Safeguarding Concern Form or safeguarding@reaseheath.ac.uk so they can be reviewed and triaged by the Safeguarding Team. Student Services and relevant managers may then be involved following triage where support, conduct, welfare or investigation action is required.

5.1 Disclosure and Reporting

5.1.1 Learners may disclose harassment, bullying, sexual harassment or sexual misconduct to any member of College staff for the purpose of seeking support, advice or assistance. A disclosure does not necessarily mean that the learner wishes to make a formal report. However, staff must explain appropriately that information may need to be shared or acted upon where safeguarding, risk of harm, sexual misconduct, hate-related behaviour, discrimination or other serious concerns are identified.

5.1.2 A report is the formal communication of information to the College so that it can be assessed and, where appropriate, addressed through safeguarding, behaviour, disciplinary, complaints or other College procedures. Learners may disclose or report something that has happened to them, something they have witnessed, or a concern about another learner. The College may also consider information received from witnesses, parents, carers, staff, employers, placement providers or other third parties.

5.1.3 Learners do not need to decide whether behaviour meets a particular legal, safeguarding or disciplinary definition before disclosing or reporting it. Staff should listen, record accurately, preserve available evidence and ensure the concern is routed for appropriate assessment in line with this procedure.

5.1.4 Where appropriate, the College will support learners to make a disclosure or report, including through reasonable adjustments to reporting arrangements or support from another person. Reports involving sexual harassment, sexual misconduct, harmful sexual behaviour, hate-related behaviour, discrimination, coercion, exploitation, threats, criminal behaviour or risk of harm must be referred promptly to the Safeguarding Team for assessment, support and pathway decision.

5.1.5 Higher education students should also refer to the [Harassment, Sexual Misconduct and Intimate Personal Relationships Single Comprehensive Source](#) for current reporting routes and the additional arrangements that apply under Office for Students Condition E6.

5.2 Step 1 - Receive

5.2.1 Any member of staff receiving a disclosure, allegation or concern must:

- Listen without judgement.
- Take the concern seriously.
- Reassure the learner that the concern will be acted upon.
- Explain that information may need to be shared to keep people safe.
- Assess whether there is any immediate risk of harm.
- Preserve available evidence.

5.2.2 Examples of evidence may include text messages, social media posts, images, emails, screenshots, witness accounts, CCTV details, location information, dates and times.

5.3 Step 2 - Record

Timescale: same working day

The concern must be submitted before the end of the working day using the College Safeguarding Concern Form so that it is received by the Safeguarding Team for review and triage.

5.3.1 Where immediate safeguarding advice is required, staff must contact the Safeguarding Team using the College's published safeguarding contact arrangements and then complete the reporting form as soon as possible.

- Record the concern accurately and objectively.
- Capture the learner voice as closely as possible.
- Record names of learners whose behaviour is being reported and witnesses where known.
- Upload or reference available evidence.
- Indicate whether immediate safeguarding advice has been sought.
- Avoid informal-only responses unless the concern has been properly recorded and triaged.

5.3.2 Failure to record concerns may place learners at risk, prevent appropriate intervention and reduce the College's ability to identify patterns or repeat incidents.

5.4 Step 3 - Triage

Timescale: within 24 hours of receipt

The Safeguarding Team owns the initial review and triage of reports submitted. Student Services, the Attendance and Behaviour Officer, and relevant managers are involved where the concern requires a conduct, welfare, support or investigation response. Where safeguarding indicators are present, the Safeguarding Team owns the safeguarding pathway decision. In combined cases, Safeguarding, Student Services and the relevant manager must agree a named lead, record the rationale for the pathway selected, and communicate this to relevant staff involved in the response.

Triage outcome	Description	Typical response
Behaviour conflict	One-off disagreement, friendship issue or low-level interpersonal conflict where bullying indicators are not present.	Pastoral support, Progress Coach involvement, restorative conversation or behaviour reminder.
Harassment or bullying concern	Repeated, targeted, harmful or intimidating behaviour, or behaviour likely to continue.	Formal investigation allocated and support plan considered.
Safeguarding concern	Actual or potential risk of harm, sexual harassment, hate incident, exploitation, threats, coercion, criminal behaviour or serious online abuse.	Immediate safeguarding pathway alongside any student conduct process.
Combined pathway	Concerns which require both safeguarding oversight and behaviour or disciplinary action.	Safeguarding Team, Attendance and Behaviour Officer and relevant manager agree roles, information sharing and protective measures.

5.5 Step 4 - Investigation

Timescale: investigation commenced within 3 working days

The investigation should begin promptly once allocated. Where timescales cannot be met due to complexity, safeguarding, police involvement or learner absence, the reason must be recorded and learners kept appropriately informed.

5.5.1 Investigations and decision-making will be conducted fairly, impartially and without any reasonable perception of bias. Investigators and decision-makers must have appropriate knowledge, skills and training for the matters being considered. Where an actual or perceived conflict of interest exists, an alternative investigator or decision-maker will be appointed.

5.5.2 Investigations involving sexual harassment, sexual misconduct or harmful sexual behaviour will be undertaken by appropriately trained staff. The process will seek to minimise unnecessary repetition of accounts or questioning that may cause additional distress, while ensuring that relevant information is gathered fairly and appropriately.

- Meet with the reporting learner and agree immediate support arrangements.
- Meet with learners whose behaviour is being reported and witnesses.
- Review online evidence, physical evidence, CCTV availability and relevant records.
- Consider equality, diversity and inclusion implications, including protected characteristics.
- Consider whether reasonable adjustments or SEND support are required.
- Consider safeguarding risks and whether external agencies or specialist advice are required.

- Maintain an auditable record of decision-making.

5.5.3 Temporary protective measures may include timetable adjustments, residential arrangements, increased supervision, temporary separation of learners, restrictions on contact, temporary suspension in the most serious instances or other proportionate measures. Such measures are precautionary and do not determine the outcome of the investigation.

5.6 Step 5 - Outcome

Timescale: normally within 10 working days

The outcome should be recorded and communicated appropriately. Where a case is complex, the reason for any extension must be recorded and relevant learners updated.

5.6.1 Persons directly affected by decisions relating to harassment or sexual misconduct will be informed directly of the decision and the reasons for that decision, together with information about any review or appeal route available to them. Information about sanctions or actions affecting another person will be shared only to the extent that it is lawful, necessary and appropriate.

5.6.2 The investigator will normally reach one of the following conclusions:

Finding	Typical response
No bullying or harassment identified	Support and monitoring where appropriate.
Behaviour concern identified	Pastoral or behavioural intervention.
Bullying or harassment confirmed	Restorative, behavioural and/or disciplinary action.
Safeguarding concern identified	Safeguarding pathway and external agency involvement where required.

Possible actions may include:

Type of action	Examples
Supportive interventions	Progress Coach support, Student Services support, counselling referral, mentoring, safety planning, academic adjustments or residential support.
Restorative interventions	Restorative meeting, facilitated conversation, mediation or reparation activity where safe and appropriate.
Behavioural interventions	Behaviour contract, learner improvement plan, timetable amendment, restrictions on activities or structured monitoring.

Type of action	Examples
Disciplinary actions	Formal warning, suspension, removal from residential accommodation, exclusion or other actions under the Student Conduct Policy and Procedure.
External agency involvement	Safeguarding referral, police advice, local authority advice or other specialist support where required.

5.7 Step 6 - Review

Timescale: normally within 2 weeks and 6 weeks of outcome

Review checks should confirm whether behaviour has stopped, learners feel safe, support remains effective and further intervention is not required.

- Confirm with the reporting learner whether further incidents have occurred.
- Review whether support remains appropriate.
- Check whether any agreed actions have been completed.
- Consider whether additional monitoring is required.
- Record the review outcome on the College approved reporting system.

6. Informal Resolution

6.1 Informal resolution may be appropriate where concerns are low-level, there is no immediate safeguarding risk, the learner wishes to pursue this route, and staff are satisfied that the matter can be resolved safely and fairly.

6.2 Informal resolution must not be used as a substitute for recording or triage. The concern must still be recorded and assessed. Informal resolution should not normally be used where there is alleged sexual harassment, hate-related behaviour, coercion, threats, exploitation, significant power imbalance, repeated targeting or safeguarding risk.

6.3 Informal approaches may include Progress Coach support, restorative conversations, mediation, behaviour reminders or agreed expectations. Outcomes should be recorded and reviewed.

7. Formal Procedure

7.1 A formal investigation will be used where informal resolution is not appropriate, where bullying or harassment indicators are present, where the behaviour is serious, repeated or targeted, or where safeguarding, equality or disciplinary issues require formal consideration.

7.2 Where there is reason to separate learners during an investigation, proportionate temporary measures may be put in place. These may include temporary timetable changes, restrictions on contact, changes to residential arrangements, supervision plans or suspension in accordance with the Student Conduct Policy and Procedure.

8. Online Bullying and Harassment

8.1 Bullying and harassment may occur online or through digital means. The College may investigate incidents which occur outside College where they affect learner safety, wellbeing, learning, residential life, work placement or participation in the College community.

- Social media platforms.
- Messaging applications and group chats.
- Gaming platforms.
- Email.
- Online forums.
- Image, audio or video sharing.
- Artificial intelligence generated content, impersonation or manipulated images.
- Anonymous reporting or posting platforms.

8.2 Online abuse may include AI-generated images, deepfakes, image-based abuse, sexually explicit manipulation, anonymous reporting platforms, doxing, sextortion and coordinated online harassment.

8.3 Learners should be encouraged not to delete evidence until screenshots or records have been preserved, unless retaining the material presents a risk of further harm. Staff should not unnecessarily view, download, forward or share harmful, sexual, threatening or discriminatory online material. Where online content includes threats, sexual content, hate incidents, exploitation, coercion or criminal behaviour, staff must seek Safeguarding Team advice before handling or sharing the material further.

8.4 Behaviour of a sexual nature that is developmentally inappropriate, harmful, coercive or abusive may constitute harmful sexual behaviour and will be managed through safeguarding procedures.

9. Residential Accommodation

9.1 Bullying, harassment, discrimination, sexual harassment, harmful sexual behaviour, intimidation, exploitation or abusive behaviour occurring within residential accommodation will be treated as a safeguarding, welfare and conduct matter. Safeguarding considerations will take priority where there is any risk of harm.

9.2 Residential learners must have access to clear reporting routes during and outside normal College hours. Residential staff must respond promptly, take immediate action to reduce risk, and submit concerns through the College reporting form as soon as possible. Where there is immediate risk of harm, staff must contact the Safeguarding Team or the relevant out-of-hours duty support contact immediately.

9.3 Temporary protective measures may include room moves, residential separation agreements, increased supervision, restrictions on contact or communal access, temporary changes to accommodation arrangements, or emergency alternative accommodation where required to keep learners safe. These measures are precautionary and do not determine the outcome of any investigation.

9.4 Where bullying, harassment, intimidation, exploitation or abuse contributes to a learner going missing from education or residential accommodation, the matter will be managed through safeguarding procedures and the Residential Missing Learner Protocols.

10. Support for Learners

10.1 The College will adopt a learner-centred approach and will seek to:

- Listen to and respect learner views.
- Minimise repeated retelling of incidents.
- Keep learners informed of progress where appropriate.
- Provide support throughout the process.
- Protect learners from further victimisation.
- Ensure appropriate support is available to reporting learners, witnesses and learners whose behaviour is being reported.
- Make reasonable adjustments where required.
- Consider academic, residential, placement and wellbeing impacts.
- For residential learners under 18, details of the independent listener service and external advocacy arrangements will be provided during induction and displayed within residential accommodation.
- Learners will be provided with information regarding external support agencies including:
 - Childline
 - NSPCC
 - Victim Support
 - Local safeguarding services

10.2 Information relating to reports of harassment, bullying or sexual misconduct will be handled sensitively and shared only where there is a legitimate need to do so. Learners will, where appropriate, be informed about how information they provide may be used, including where information may need to be considered within safeguarding, investigation, disciplinary or external agency processes. Information will be managed in accordance with data protection requirements and the College's safeguarding and information governance arrangements.

10.3 Support will be tailored to individual need and will be available before, during and following investigation or decision-making processes. Access to appropriate support will not depend upon a learner making a formal complaint or upon an allegation being upheld.

10.4 The College will not tolerate retaliation, intimidation, victimisation or adverse treatment directed towards a person because they have reported, disclosed, witnessed or provided information about harassment, bullying or sexual misconduct, or participated in an investigation. Any such behaviour may itself result in safeguarding, protective or disciplinary action.

11. Information, Awareness, Training & Prevention

11.1 The College will take proactive and preventative steps to reduce the likelihood of harassment, bullying and sexual misconduct occurring. Prevention activity will include clear communication to learners about expected standards of behaviour, consent, respectful relationships, harassment, sexual misconduct, bullying and routes for reporting concerns.

11.2 Harassment, bullying and sexual misconduct awareness will be included within learner induction and appropriate ongoing tutorial, enrichment, residential, online safety, equality and diversity, healthy relationships and student experience activity.

11.3 Targeted preventative activity will be informed by identified risks, learner feedback, reporting data, safeguarding intelligence and emerging themes. This will include consideration of risks associated with residential environments, online activity, placements, social events and other contexts where learners may be particularly vulnerable.

11.4 The College will promote safe and accessible routes through which learners can disclose or report concerns, provide appropriate staff training in recognising and responding to harassment, sexual misconduct and bullying, and promote professional boundaries and expectations for staff working with learners.

11.5 The effectiveness of prevention activity will be reviewed regularly, informed by learner experience, reporting patterns, safeguarding intelligence and governance oversight. Prevention activity will recognise that low levels of reporting do not necessarily demonstrate a low prevalence of harassment or sexual misconduct, and the College will therefore consider wider evidence and learner experience when assessing risk and the effectiveness of its arrangements.

11.6 Learners will be made aware of this procedure during induction and through ongoing communication of College values, conduct expectations and reporting routes.

11.7 Staff will receive appropriate information and training so that they understand how to recognise bullying and harassment, how to respond to concerns, when to escalate to safeguarding, how to record concerns, and what timescales apply.

11.8 Managers, Progress Coaches, Student Services, Residential Services and Safeguarding staff should receive training proportionate to their roles. Training should include online bullying, protected characteristic harassment, sexual harassment, residential incidents, learner conflict and repeat low-level concerns.

12. Monitoring, Quality Assurance and Governance

12.1 The Safeguarding Team will maintain central oversight of harassment and bullying reports received through the College reporting arrangements. Student Services, the Attendance and Behaviour Officer and relevant managers will contribute information following triage where they are involved in support, conduct, welfare, residential or investigation responses.

12.2 Data will be reviewed to:

- Identify repeat incidents.
- Identify emerging themes.
- Monitor patterns involving protected characteristics.
- Identify locations, activities, curriculum areas or residential settings presenting increased risk.
- Evaluate the effectiveness of interventions.
- Inform training, prevention activity and safeguarding governance.
- Monitor patterns of sexual harassment and sexual misconduct, including repeat concerns involving individuals, groups, locations, activities or contexts.
- Consider learner feedback, survey information, safeguarding intelligence and other indicators alongside formal reporting data.
- Identify evidence of barriers to reporting or groups who may be less likely to report concerns.
- Evaluate whether preventative measures are making a credible and measurable difference and identify where further action is required.

12.3 Themes, trends and identified risks will be reported through safeguarding governance arrangements to support quality improvement, learner safety and assurance to senior leaders and governors.

12.4 Residential bullying, harassment and safeguarding data will be reviewed termly by the Residential Oversight Committee and reported through safeguarding governance arrangements, including the nominated safeguarding governor.

13. Expected Service Standards

Activity	Standard timescale
Concern recorded	Same working day
Safeguarding advice sought where immediate risk is identified	Immediately
Triage completed	Within 24 hours of receipt (1 working day)
Initial learner contact	Within 24 hours where appropriate (1 working day)
Investigation allocated and commenced	Within 3 working days
Outcome communicated	Normally within 10 working days
First review	Within 2 weeks of outcome
Second review	Within 6 weeks of outcome

14. Parent, Carer and External Communication

14.1 The College will consider parent or carer communication on a case-by-case basis, taking account of the learner's age, vulnerability, wishes, capacity, consent, safeguarding risk, data protection requirements and the need to protect all learners involved.

14.2 For learners under 18, parents or carers will normally be informed where there is a significant bullying, harassment, safeguarding or welfare concern, unless doing so would increase risk, compromise a safeguarding response, prejudice an investigation, or be contrary to professional advice.

14.3 For adult learners, including higher education students, information will not normally be shared with parents or carers without the learner's consent, unless there is a safeguarding concern, serious risk of harm, legal requirement, or other legitimate basis for sharing information.

14.4 Where a learner is a vulnerable adult, has identified support needs, or may lack capacity in relation to a specific decision, the College will consider appropriate involvement of parents, carers, advocates or

external agencies in line with safeguarding procedures, consent, capacity and confidentiality requirements.

14.5 Residential parents or carers of learners under 18 will normally be informed where a serious bullying, harassment or safeguarding incident affects the learner's welfare within accommodation.

14.6 Where the concern involves an apprentice, the College will consider employer communication separately for the reporting learner and for the learner whose behaviour is being reported. Employer contact may be necessary to support safeguarding or protective measures, manage workplace safety, maintain apprenticeship training responsibilities, support reasonable adjustments, or assist an investigation where the concern relates to the workplace or training environment.

14.7 Any employer communication must be proportionate, necessary and limited to information required for the stated purpose. Before contacting an employer, staff must consider safeguarding risk, the learner's age and vulnerability, consent and confidentiality, data protection, employment and training responsibilities, risk of retaliation, and whether employer involvement could increase risk. Where there is uncertainty, staff must seek advice from the Safeguarding Team before employer contact is made and, where relevant, involve the apprenticeship, data protection or senior leadership lead.

14.8 Any decision to inform, not inform, delay informing, or limit information shared with parents, carers, employers or external agencies must be recorded with a clear rationale on the College approved reporting system.

15. Case Handling Review and Complaints

15.1 A learner who is dissatisfied with how a concern has been handled, the timeliness of the response, the support provided, the way an outcome has been communicated, or the way the procedure has been applied may request a case handling review through Student Services & Safeguarding. Student Services must ensure that any safeguarding, sexual misconduct, welfare or risk-related issue raised through a review request is referred to the Safeguarding Team for consideration before the review pathway is confirmed. The request should normally be made in writing and should explain the aspect of handling or process the learner is concerned about.

15.2 The review should normally be undertaken by a manager who has not had direct responsibility for the original decision or day-to-day handling of the case.

15.3 The purpose of a case handling review is to consider whether the procedure was followed properly, whether relevant evidence was considered, whether safeguarding and equality duties were appropriately addressed, and whether the outcome communication or support arrangements remain appropriate. It is not normally a reinvestigation of the original concern unless there is evidence of procedural error, material information that was not considered, or a safeguarding concern requiring further action.

15.4 If the learner remains dissatisfied after this review, or where the concern relates to procedural fairness, delay, communication, service quality or the way the College has handled the matter, the learner may use the College complaints procedure.

15.5 Where the matter is being considered under the Student Conduct Policy and Procedure, any appeal route within that procedure will apply to conduct decisions. Safeguarding decisions, protective measures and information-sharing decisions will be managed in line with safeguarding procedures and may not be delayed by a complaint or appeal where action is required to protect learners.

16. Related Policies and Procedures

- Child Protection and Safeguarding Policy.
- Safeguarding Adults Policy.
- Student Conduct Policy and Procedure.
- College Complaints Procedure.
- Student Charter.
- Equality, Diversity and Inclusion Policy.
- Staff Code of Conduct.
- Consensual Relations Policy.
- Freedom of Speech Code of Practice.
- Harassment, Sexual Misconduct and Intimate Personal Relationships Single Comprehensive Source for Higher Education Students where applicable.

Addendum for Compliance with Office for Students Condition E6

For the purpose of this addendum, the term "student" is used where it reflects Office for Students terminology and should be read as referring to higher education students where applicable.

A1. Intimate Personal Relationships

To protect students from abuse of power and conflicts of interest, Reaseheath prohibits intimate personal relationships where a staff member has academic, pastoral, administrative or professional responsibility for a student. Beyond this, intimate relationships are strongly discouraged and must be declared so safeguards can be applied. Breach of this requirement may result in disciplinary action.

Students will not be penalised for reporting or seeking support in relation to harassment or sexual misconduct arising within an intimate personal relationship with a member of staff, including where the relationship itself may have breached College requirements. The College will take appropriate steps to protect students from retaliation and to manage any actual or potential conflict of interest or abuse of power.

The requirements in this section should be read alongside the College Consensual Relations Policy, which sets out the detailed expectations, declaration requirements and arrangements for managing conflicts of interest and professional boundaries.

A2. Freedom of Speech and Sexual Harassment

The College affirms that lawful freedom of speech, including academic debate, is protected. A rebuttable presumption applies where exposure to course content, including books, media and ideas, and statements made in teaching, research or connected academic discussion, is unlikely to amount to harassment. The College will uphold lawful expression while meeting equality and safeguarding duties.

Harassment and sexual misconduct policies shall not be used to unduly restrict lawful speech.

Sexual harassment refers to unwanted sexual advances, inappropriate touching, explicit derogatory statements or sexually discriminatory remarks or jokes which create a hostile, intimidating or offensive learning environment. Sexual harassment is a form of sex discrimination and may also engage safeguarding or criminal processes.

Sexual misconduct includes unwelcome sexual behaviour conducted without consent. It ranges from inappropriate sexual behaviours to sexual harassment and assault and may have legal implications beyond anti-discrimination law.

A3. Staff Training for HE-Related Requirements

All relevant staff will receive training on harassment, sexual misconduct, safeguarding, freedom of speech and how these requirements interact. This supports consistent understanding and effective handling of issues in accordance with this procedure.

A4. Support for Students in HE-Related Cases

The College will ensure appropriate support is offered to complainants, witnesses and alleged perpetrators. This may include counselling, safeguarding support, academic adjustments and other proportionate support arrangements.

A5. Communication of Outcomes

Following an investigation, relevant parties will be informed of the outcome and any actions that can appropriately be shared, in line with data protection, safeguarding and fairness obligations.

A6. Non-Disclosure Agreements

The College does not use non-disclosure agreements to prevent students from disclosing allegations of harassment or sexual misconduct.

A7. OfS Condition E6

Where a student is a higher education student and uses this procedure, it should be read alongside the Harassment, Sexual Misconduct and Intimate Personal Relationships Single Comprehensive Source and the Freedom of Speech Code of Practice.

Issue/Version	August 2026
Lead	Vice Principal Curriculum and Quality
Review Period	Every three years
Next Review	July 2029
Equality Analysis Review (if applicable)	September 2026
Approved by	Executive