



QAHE Limited Prevention of Bullying, Harassment, Sexual Misconduct and Relationship Abuse Policy

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1. Introduction

QAHE Limited (QA Higher Education) is unequivocally committed to creating and maintaining a learning and working environment in which all members of our community are safe, respected, and able to thrive. Bullying, harassment, sexual misconduct, and relationship abuse are serious violations of personal dignity and trust and will not be tolerated.

This policy sets out QA Higher Education's clear expectations of behaviour and its robust, compassionate, and trauma-informed approach to preventing, addressing, and responding to bullying, harassment, sexual misconduct, and relationship abuse. We recognise the significant and lasting impact these experiences can have and place the wellbeing, safety, and autonomy of those affected at the centre of our response.

QA Higher Education's approach is aligned with relevant external legal frameworks and regulatory expectations, including the Office for Students' Condition E6, which requires higher education providers to take effective action to prevent and respond to harassment and sexual misconduct, protect students from harm, and ensure that reporting and response processes are fair, accessible, and transparent. In addition to breaching this policy, such behaviours may constitute offences under civil and criminal law, including the Equality Act 2010, Sexual Offences Act 2003, Domestic Abuse Act 2021, Criminal Justice and Public Order Act 1994, and the Protection from Harassment Act 1997.

The purpose of this policy is to outline how QA Higher Education will:

- foster an inclusive, respectful, and safe working and learning environment;
- set clear expectations that bullying, harassment, sexual misconduct, and relationship abuse are unacceptable in any form;
- ensure students or staff who experience such behaviours are supported, listened to, and empowered to make informed choices; and
- respond to disclosures and incidents promptly, proportionately, and effectively.

QA Higher Education is committed to taking all reasonable and proportionate steps to prevent bullying, harassment, sexual misconduct, and relationship abuse through education, training, awareness-raising, and proactive intervention. Where incidents occur or are disclosed, QA Higher Education will act decisively and appropriately, using fair, transparent, and trauma-informed processes to address harm, safeguard those affected, and reduce the risk of recurrence.

2. Policy Ownership

Ownership of this Policy sits with the Assistant Director of Safeguarding, Student Life and Wellbeing, who acts as the Lead Sexual Misconduct and Violence Officer (LSMVO) and is responsible for ensuring the Policy is implemented effectively and in line with relevant legal and regulatory requirements, including the Office for Students' Condition E6.



The Head of Safeguarding and Student Wellbeing acts as Deputy Lead Sexual Misconduct and Violence Officer (DLSMVO) and supports the LSMVO in the delivery and ongoing oversight of this Policy.

Operational responsibilities for the application of this Policy are shared between the Welfare Team and the People Team, with specific responsibilities for students and staff set out in the Responsibilities and Implementation Procedures sections.

Strategic oversight and governance of this Policy are provided by the Executive Board, which holds collective accountability for regulatory compliance, resource allocation, and assurance that effective measures are in place to prevent and respond to harassment, sexual misconduct, and relationship abuse.

3. Scope

This Policy applies to allegations of bullying, harassment, sexual misconduct, and relationship abuse made against students, academic, research, and professional services staff, QA Higher Education appointees, and other individuals engaged in QA Higher Education-related activity.

Allegations relating to conduct outside this timeframe may also be considered where it is reasonable and proportionate to do so, particularly where the behaviour raises ongoing safeguarding, wellbeing, or fitness-to-study or fitness-to-practise concerns.

In line with the Office for Students' expectations under Condition E6, this Policy applies to behaviour that may affect the safety, wellbeing, or educational experience of students, regardless of where the conduct occurred. Alleged misconduct may therefore fall within the scope of this Policy where it has occurred:

- on or off QA Higher Education premises or land;
- in the course of any QA Higher Education-related activity, including teaching, learning, placements, internships, fieldwork, trips, or events;
- through the use of QA Higher Education IT systems or digital platforms;
- online, including via email, the internet, or social media, whether or not such activity occurs on QA Higher Education systems;
- in the UK or overseas;
- where the behaviour is the subject of a police investigation, criminal charge, or conviction;
- where the behaviour raises concerns about a student's fitness to study or fitness to practice; or
- where the behaviour poses, in the judgement of QA Higher Education and/or a partner University, a risk to the safety, wellbeing, good order, or reputation of the QA Higher Education community.
- The application of this Policy does not prevent individuals from pursuing external remedies, including reporting matters to the police or seeking civil action. Where criminal or civil proceedings are ongoing, QA Higher Education will take a proportionate and risk-based approach to ensure the safety of its community while continuing to meet its safeguarding and regulatory responsibilities.



4. What this Policy covers

This Policy applies to behaviours that constitute bullying, harassment (as defined by the Equality Act 2010 where related to a protected characteristic), sexual misconduct, or relationship abuse, where such behaviour impacts the safety, dignity, wellbeing, or educational experience of members of the QA Higher Education community.

This includes, but is not limited to:

- bullying, including repeated or targeted behaviour intended to intimidate, undermine, humiliate, exclude, or cause distress;
- harassment related to a protected characteristic under the Equality Act 2010, including sexual harassment;
- unwanted sexual activity or behaviour without consent;
- sexual assault, rape, and non-consensual sexual touching;
- abuse of power, including sexual exploitation and behaviour arising from real or perceived power imbalances;
- relationship abuse in all forms, including psychological, emotional, physical, sexual, financial, coercive, controlling, digital, and online abuse;
- stalking, including online and in-person stalking;
- grooming and sexual exploitation;
- image-based abuse, including the non-consensual creation, sharing, or threat to share sexual images; and
- honour-based abuse, forced marriage, and Female Genital Mutilation.

The behaviours listed above may occur as single incidents or as part of a pattern of behaviour and may take place in person, online, within intimate or personal relationships, or in the context of work or study. All such behaviour is unacceptable and will be addressed in line with this Policy.

4. Definitions

4.1. Abuse of Power

Abuse of power occurs when a person misuses their authority, influence, or position within a hierarchy to take advantage of, coerce, manipulate, or harm another person. This includes situations involving real or perceived power imbalances, such as between staff and students, supervisors and supervisees, or senior and junior colleagues.

4.2. Anonymous Reporting

Anonymous reporting allows an individual to share information about harassment, sexual misconduct, or relationship abuse without providing identifying personal details. QA Higher Education will not attempt to verify or identify the person making an anonymous report.

Where anonymous reports are made via digital or telephone systems, limited information such as a mobile telephone number may be visible for the purposes of managing the report



and assessing safeguarding risks. Anonymous reports will be taken seriously but may limit the ability to take formal action.

4.3. Bullying

Bullying is offensive, intimidating, malicious, insulting, or abusive behaviour, or an abuse or misuse of power, that has the purpose or effect of undermining, humiliating, denigrating, or injuring another person.

Bullying may be physical, verbal, non-verbal, psychological, relational, digital, or online. It may involve a one-off incident or a pattern of behaviour and may include exclusion, spreading rumours, persistent criticism, setting someone up to fail, ridiculing or belittling a person, or misuse of authority or power.

Bullying does not need to relate to a protected characteristic to fall within the scope of this Policy.

4.4. Consent

Consent is the clear, voluntary, and ongoing agreement to engage in a specific sexual activity, given by an individual who has the freedom and capacity to make that decision. Consent must be present throughout any sexual activity and can be withdrawn at any time. Consent cannot be assumed based on a previous sexual encounter, an existing relationship, or the absence of resistance.

4.5. Freedom to Consent

For consent to be valid, participation must be voluntary. Consent is not present where submission results from coercion, pressure, manipulation, abuse of power, intimidation, or force. Any threat of physical, emotional, academic, professional, or social harm that would reasonably cause a person to feel compelled to engage in sexual activity invalidates consent.

4.6. Capacity to Consent

Consent cannot be given where a person lacks the mental capacity to understand, retain, or weigh relevant information, or to communicate their decision. A person may lack capacity if they are asleep, unconscious, semi-conscious, intermittently conscious, or otherwise incapacitated.

Incapacitation may result from alcohol or drug use, illness, disability, or a combination of factors. Intoxication is never an excuse for sexual misconduct. Where there is any doubt about capacity, sexual activity must not take place.

4.7. Controlling Behaviour

Controlling behaviour consists of acts designed to make a person dependent or subordinate, including restricting access to finances, education, social support, healthcare, communication, or freedom of movement.

4.8. Coercive Behaviour

Coercive behaviour is a pattern of acts intended to intimidate, threaten, isolate, or punish a person, causing fear, distress, or loss of autonomy. This may include monitoring behaviour, isolation from friends or family, threats, humiliation, or manipulation.



4.9. Disclosure

A disclosure is the act of informing QA Higher Education about an experience of harassment, sexual misconduct, or relationship abuse for the purpose of seeking support, advice, or information. Disclosure does not require a formal report to be made.

4.10. Duty of Care

QA Higher Education has a duty of care to take reasonable steps to safeguard the health, safety, and wellbeing of its students and staff and to provide educational and pastoral services to the standard expected of a competent higher education provider.

4.11. Grooming

Grooming is a process by which an individual builds trust, emotional connection, or dependency in order to manipulate, exploit, or abuse another person. Grooming may occur in person or online and can involve flattery, attention, gifts, or boundary-testing behaviour.

4.12. Harassment

As defined by the Equality Act 2010, harassment includes unwanted behaviour or conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment related to a protected characteristic. This includes sexual harassment.

4.13. Relationship Abuse

Relationship abuse is any incident or pattern of controlling, coercive, threatening, violent, or abusive behaviour between individuals aged 16 or over who are, or have been, personally connected, regardless of gender, sexuality, or living arrangements.

This includes psychological, emotional, physical, sexual, financial, coercive, controlling, digital, and online abuse, as well as stalking, honour-based abuse, forced marriage, and Female Genital Mutilation.

4.14. Reported Party

The Reported Party is the individual or individuals against whom allegations of harassment, sexual misconduct, or relationship abuse have been made.

4.15. Reporting

Reporting is the act of making a formal complaint to QA Higher Education in order to initiate consideration under this Policy and its associated procedures. Reporting is distinct from disclosure.

4.16. Reporting Party

The Reporting Party is the individual or individuals who have experienced or witnessed the alleged behaviour and who make a report under this Policy.

4.17. Sexual Misconduct

Sexual misconduct refers to a broad range of unwanted, inappropriate, or harmful sexual behaviours. This includes, but is not limited to, sexual assault, rape, non-consensual sexual touching, sexual harassment, sexual exploitation, image-based abuse, stalking, online sexual abuse, and unwanted sexual comments or advances.



4.18. Sexual Exploitation

Sexual exploitation involves abusing a position of power, trust, or authority to obtain sexual advantage, benefit, or gratification. This may include exchanging sexual acts for academic, professional, financial, or social benefit.

4.19. Stalking

Stalking is a pattern of repeated, intrusive, fixated, or obsessive behaviour that causes fear, alarm, or distress. Stalking may occur in person or online.

4.20. Victimisation

Victimisation occurs when a person is treated unfavourably because they have made, supported, or are believed to be considering making a disclosure or report under this Policy, or have exercised rights under equality, safeguarding, or whistleblowing legislation.

4.21. Witness

A witness is a person who has observed or has direct knowledge of an incident of harassment, sexual misconduct, or relationship abuse. A witness may make a disclosure or report under this Policy and may be asked to provide information as part of any subsequent process.

5. Policy Statement

QA Higher Education expects all members of its community to treat one another with dignity, respect, and consideration. Bullying, harassment, sexual misconduct, and relationship abuse are unacceptable and are not tolerated in any form.

All students, staff, and others engaged in QA Higher Education activities must:

- behave in a way that respects personal boundaries and the rights of others;
- ensure that consent is clear, freely given, and ongoing in any sexual activity;
- avoid behaviour that is intimidating, threatening, coercive, controlling, abusive, bullying, or exploitative; and
- take responsibility for their actions and their impact on others.

The following behaviours are prohibited under this Policy:

- bullying;
- harassment, including sexual harassment;
- any sexual activity without consent;
- sexual assault, sexual exploitation, and image-based abuse;
- relationship abuse in any form, including controlling, coercive, emotional, physical, sexual, financial, digital, or online abuse;
- stalking, including online stalking;
- grooming and abuse of power; and
- victimisation or retaliation against anyone who makes a disclosure or report or supports another person.

QA Higher Education is committed to responding to disclosures and reports in a way that is fair, supportive, and trauma-informed. Individuals who experience or witness bullying,



harassment, sexual misconduct, or relationship abuse can seek support without being required to make a formal report.

This Policy is guided by the following principles:

- the safety, wellbeing, and dignity of those affected are prioritised;
- individuals are treated with respect, sensitivity, and fairness;
- choice and autonomy are respected wherever possible;
- confidentiality is maintained, subject to safeguarding responsibilities; and
- action is taken to prevent harm and reduce the risk of recurrence.

QA Higher Education will take all reasonable and proportionate steps to prevent bullying, harassment, sexual misconduct, and relationship abuse through education, training, and awareness-raising. Breaches of this Policy may result in action under QA Higher Education disciplinary, safeguarding, or fitness-to-study or fitness-to-practise processes and may also be referred to external agencies where appropriate.

6. Responsibilities

6.1. QA Higher Education Executive Board

The Executive Board has overall responsibility for ensuring that QA Higher Education meets its legal, safeguarding, and regulatory obligations in relation to bullying, harassment, sexual misconduct, and relationship abuse. The Executive Board provides strategic oversight of this Policy, receives assurance through monitoring and reporting, and ensures that appropriate resources, training, and preventative measures are in place.

6.2. Assistant Director of Safeguarding, Student Life and Wellbeing

The Assistant Director of Safeguarding, Student Life and Wellbeing holds operational ownership of this Policy and is responsible for ensuring its effective implementation. This includes oversight of reporting routes, support mechanisms, training, and the management of disclosures and reports involving students.

6.3. Head of Safeguarding and Student Wellbeing

The Head of Safeguarding and Student Wellbeing supports the Assistant Director of Safeguarding, Student Life and Wellbeing in delivering this Policy and is responsible for coordinating day-to-day welfare responses, signposting to appropriate support, contributing to prevention activity, and supporting monitoring and review.

6.4. Sexual Violence Liaison Officers (SVLOs)

Sexual Violence Liaison Officers provide confidential, non-judgemental support to individuals who have experienced or been affected by sexual violence or misconduct. SVLOs listen, provide information about options and support, and assist individuals in accessing internal and external services. SVLOs do not investigate incidents or require individuals to make a formal report.

6.5. People Team and Director of People Team – QA Higher Education

The Director of People - HE, supported by the People Team, is responsible for managing disclosures, reports, and allegations involving staff. This includes ensuring that appropriate employment, safeguarding, and disciplinary procedures are followed and that staff are supported throughout the process.



6.6. Student Conduct and Resolutions Officer

Student Conduct and Resolutions Officers are responsible for managing reports and complaints relating to student conduct under this Policy. They ensure that matters are handled fairly, consistently, and in line with published procedures, and that students are supported and informed throughout any conduct or resolution process.

6.7. Student Welfare Risk Panel

The Student Welfare Risk Panel is responsible for considering cases where there are significant or ongoing welfare or safeguarding concerns. The Panel assesses risk, agrees proportionate safeguarding measures, and ensures that appropriate support and risk management plans are in place to protect students and the wider community.

6.8. Student Disciplinary Panel

The Student Disciplinary Panel is responsible for considering cases referred under QA Higher Education's formal disciplinary procedures where there is an alleged breach of this Policy. The Panel determines, on the balance of probabilities, whether a breach has occurred and applies proportionate outcomes or sanctions in line with QA Higher Education regulations and principles of fairness.

Where a case may result in a sanction of suspension or expulsion, or where such outcomes are being considered, the matter will be escalated to the partner University in accordance with agreed arrangements and governance frameworks. Decisions relating to suspension or expulsion will be made by the partner University, with QA Higher Education providing relevant information and support as required.

6.9. Managers, Heads of Department, and Academic Leaders

Managers and Heads of Department are responsible for promoting a respectful and inclusive environment, ensuring staff are aware of and trained on this Policy, and escalating concerns promptly to the appropriate teams.

6.10. All Staff

All staff are responsible for:

- familiarising themselves with and complying with this Policy;
- completing required training;
- maintaining professional boundaries and behaving in a manner that upholds dignity and respect;
- challenging inappropriate or harmful behaviour where it is safe and appropriate to do so, and reporting concerns through the appropriate QA Higher Education channels; and
- reporting disclosures, concerns, or suspected breaches of this Policy in line with QA Higher Education procedures.

6.11. Students

Students are responsible for:

- familiarising themselves with this Policy and related guidance;
- treating others with dignity, respect, and consideration;
- taking responsibility for their own behaviour and its impact on others;



- seeking support or reporting concerns where they experience or witness behaviour covered by this Policy; and
- where safe to do so, challenging inappropriate behaviour or supporting others to access help, including by sharing information about available support services.

7. Related Policies and Procedures

This Policy should be read alongside the following QA Higher Education policies and procedures, which together set out QA Higher Education's approach to equality, safeguarding, conduct, and wellbeing:

7.1. Internal QA Higher Education Policies

Respect for All Policy - sets expectations for respectful behaviour and positive conduct across the QA Higher Education community.

Fitness to Study Policy – outlines how QA Higher Education supports students whose health or wellbeing may affect their ability to engage safely and effectively with their studies.

Equality and Diversity Policy (QA Higher Education Students) - sets out QA Higher Education's commitment to equality, diversity, and inclusion and compliance with equality legislation.

QA Higher Education Safeguarding Policy - details QA Higher Education's safeguarding responsibilities and processes for protecting children and adults at risk.

QA Higher Education Freedom of Speech Policy - explains how QA Higher Education upholds freedom of speech within the law while protecting individuals from harassment and harm.

Dignity at Work Policy - applies to staff and sets expectations for respectful behaviour and procedures for addressing bullying and harassment.

Screening and Vetting Policy - outlines requirements for recruitment checks and ongoing suitability to work with students.

7.2. External Legislation and Regulatory Frameworks

This Policy is informed by, and operates in accordance with, relevant UK legislation and regulatory requirements, including but not limited to:

- the Equality Act 2010;
- the Sexual Offences Act 2003;
- the Protection from Harassment Act 1997;
- the Criminal Justice and Public Order Act 1994;
- the Domestic Abuse Act 2021;
- data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

QA Higher Education also has regard to the regulatory expectations of the Office for Students (OfS), including Condition E6, which requires higher education providers to take effective and proportionate steps to prevent and address harassment and sexual misconduct, protect students from harm, and ensure that reporting and response processes are fair, accessible, and transparent.

Where behaviour falls outside the scope of this Policy, or where additional considerations apply, matters may be addressed under one or more of the above policies, procedures, or

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external processes. QA Higher Education will take a coordinated and proportionate approach to ensure concerns are managed appropriately and in line with legal, safeguarding, and regulatory requirements.

8. Implementation Procedures

This section explains how this Policy is put into practice. Detailed steps for handling disclosures, reports, investigations, and outcomes are set out in separate procedures (Appendix B) and related policies and should be read alongside this Policy.

8.1. Training

Training is a key part of QA Higher Education's approach to preventing bullying, harassment, sexual misconduct, and relationship abuse and ensuring that this Policy is applied consistently and effectively.

QA Higher Education will provide appropriate training and awareness activity for staff and students, proportionate to their roles and responsibilities. This includes training on recognising and responding to harassment, sexual misconduct, and relationship abuse; maintaining professional boundaries; responding to disclosures; and signposting to support.

The People Team is responsible for monitoring staff training completion and ensuring that mandatory training requirements are met. Completion rates and any identified gaps will be reported through QA Higher Education's governance arrangements to support assurance and continuous improvement.

Staff are required to complete mandatory training relevant to their role and to refresh their training as required. Managers and Heads of Department are responsible for supporting staff to complete required training and for addressing non-compliance where it arises.

Students will be offered access to training and awareness sessions, including information on consent, healthy relationships, and how to seek support. Participation in student training is encouraged and designed to be accessible and supportive.

Training provision will be reviewed regularly to ensure it remains effective, inclusive, and aligned with legal and regulatory requirements, including those of the Office for Students.

8.2. Seeking Support and Raising Concerns

Anyone who experiences or witnesses bullying, harassment, sexual misconduct, or relationship abuse is encouraged to seek support.

Keeping a personal record of incidents, such as dates, times, locations, what happened, and the names of any witnesses, may be helpful but is optional and not required in order to access support or raise concerns.

8.3. Support and disclosure for Students

Students have a choice about how they seek support or raise concerns. Students may:

- disclose to the Welfare Team to seek support and advice;
- request support from a Sexual Violence Liaison Officer (SVLO);
- submit a report through QA Higher Education's reporting routes; or
- contact the Welfare Team by email, telephone, or in person.
- Access external support (Appendix A)



Disclosures made to the Welfare Team or an SVLO are not anonymous, as staff need to know who they are supporting in order to provide appropriate care. Students are not required to share full details of their experience, and support can be accessed without making a formal report.

Students who disclose will be supported by trained staff to understand their options and decide what, if any, next steps they wish to take. Unless there is an immediate safeguarding concern or risk of harm, no action will be taken without the student's knowledge.

8.4. Anonymous Reporting

Students may choose to make an anonymous report of harassment, sexual misconduct, or relationship abuse.

Anonymous reports help QA Higher Education to understand patterns of behaviour, assess safeguarding risks, and inform prevention and awareness activity. However, because QA Higher Education does not know who has made the report, it may not be possible to:

- offer direct support to the reporting person;
- seek further information or clarification; or
- take formal or disciplinary action against another individual.

Anonymous reports will still be reviewed carefully, and proportionate action may be taken where there are safeguarding concerns. Students who submit an anonymous report may also seek non-anonymous support separately through the Welfare Team or an SVLO.

8.5. Support and Reporting for Staff

Staff who experience or witness behaviour covered by this Policy should refer to the Dignity at Work Policy for guidance on disclosure and reporting. Staff may also seek advice and support from their line manager or the People Team.

8.6. Investigations and Outcomes

Where a formal report is made, QA Higher Education will manage the matter in line with this Policy, the Respect for All Policy (which sets out expectations of student conduct), and relevant staff or student procedures.

All reports will be handled fairly, promptly, and sensitively, using a trauma-informed and risk-based approach. Where appropriate, interim measures may be put in place to protect individuals and the wider community.

8.7. Environmental Investigations

Where there are multiple reports or patterns of concern within a particular area, QA Higher Education may undertake an environmental investigation to understand the context, identify risks, and implement appropriate preventative or supportive measures.

8.8. Police Involvement and Criminal Proceedings

Individuals may choose to report incidents to the police at any time. QA Higher Education processes are separate from criminal investigations.

Where criminal proceedings are ongoing or anticipated, QA Higher Education and the partner University will take a proportionate and risk-based approach to determine whether



internal processes should proceed, pause, or resume at a later stage. Decisions will be informed by safeguarding considerations and police advice where appropriate.

The outcome of a criminal process does not prevent QA Higher Education from taking action under this Policy, as internal processes consider whether QA Higher Education policies or regulations have been breached.

8.9. False or malicious complaints

Making a complaint in bad faith or knowingly providing false or misleading information is a serious matter and may result in action under staff or student disciplinary procedures. This does not apply where a report is made in good faith but is not upheld.

8.10. Confidentiality and information sharing

Information relating to disclosures, reports, and investigations will be shared only with those who need to know in order to provide support, manage risk, or fulfil safeguarding or legal responsibilities. All information will be handled in accordance with data protection legislation.

9. Monitoring and Compliance

QA Higher Education is committed to ensuring that this Policy is implemented effectively and remains fit for purpose. Compliance with this Policy will be monitored through a range of measures, including anonymised reporting on disclosures and reports, case outcomes, training completion, and feedback from students and staff.

The Assistant Director of Safeguarding, Student Life and Wellbeing, in collaboration with the People Team, is responsible for overseeing day-to-day compliance with this Policy and for identifying trends, risks, or areas for improvement. Cases involving significant welfare or safeguarding concerns will be monitored through the Student Welfare Risk Panel, which will assess risk, agree proportionate measures, and ensure appropriate support and safety planning is in place.

To support governance and assurance, quarterly anonymised monitoring reports (including themes, trends, risks, actions taken, and training completion) will be provided to the Executive Board to enable effective oversight, resourcing decisions, and continuous improvement.

QA Higher Education will review the effectiveness of training, support arrangements, reporting routes, and procedures on a regular basis to ensure they remain accessible, fair, and trauma-informed. Where issues or gaps are identified, appropriate action will be taken.

This Policy will be formally reviewed annually, or earlier where required in response to legislative changes, regulatory updates (including Office for Students requirements), or learning from incidents, complaints, or reviews. Any significant changes to the Policy will be communicated to staff and students in a timely and accessible way.

Where required, QA Higher Education will notify the Office for Students (OfS) of any reportable events or material risks in accordance with OfS regulatory requirements. Decisions regarding OfS notification will be managed through QA Higher Education's governance arrangements to ensure timely, accurate, and appropriate engagement.

Failure to comply with this Policy may result in action under relevant QA Higher Education staff or student procedures.



10. Equality Impact Assessment

QA Higher Education is committed to promoting equality, diversity, and inclusion and to eliminating discrimination, harassment, and victimisation. In developing and implementing this Policy, QA Higher Education has had due regard to its duties under the Equality Act 2010.

An Equality Impact Assessment has been undertaken to consider the potential impact of this Policy on individuals with protected characteristics, including age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership. The assessment has also considered the intersection of protected characteristics and the ways in which bullying, harassment, sexual misconduct, and relationship abuse may disproportionately affect some groups.

The Policy is intended to have a positive impact by:

- providing accessible and clear routes to support and reporting;
- recognising different experiences and barriers to disclosure;
- promoting trauma-informed, fair, and proportionate responses; and
- supporting inclusive practice across the QA Higher Education community.

QA Higher Education will take reasonable steps to ensure that information about this Policy and access to support are inclusive and accessible, including making reasonable adjustments where required. The impact of this Policy will be monitored through anonymised data, feedback, and review processes to identify any unintended adverse effects on particular groups.

The Equality Impact Assessment will be reviewed as part of the annual policy review process and updated where required, including in response to changes in legislation, regulatory expectations, or identified areas of concern.

11. Data Protection

QA Higher Education recognises that the implementation of this Policy may involve the processing of personal data, including special category personal data, such as information relating to health, safeguarding, and allegations of bullying, harassment, sexual misconduct, or relationship abuse.

A Data Protection Impact Assessment (DPIA) has been undertaken to assess and manage the data protection risks associated with the operation of this Policy. The DPIA considered the nature, scope, context, and purposes of data processing and identified appropriate measures to mitigate risk and protect the rights and freedoms of individuals.

Personal data will be processed lawfully, fairly, and transparently, and only where necessary to provide support, manage risk, fulfil safeguarding responsibilities, or carry out procedures under this Policy. Access to personal data will be restricted to those with a legitimate need to know.

Information will be handled in accordance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and in line with QA Higher Education's internal data protection policies and retention schedules.



Where anonymous reporting routes are used, data will be handled in a way that respects anonymity, while enabling appropriate safeguarding and monitoring activity.

12. Further Information

For queries about this Policy, its application, or for advice on support and reporting options, please contact the Safeguarding, Student Life and Wellbeing Team:

Email: qahe.welfare@qa.com

This mailbox is monitored and can be used to request information, guidance, or support in relation to bullying, harassment, sexual misconduct, or relationship abuse.

13. Review

This Policy will be reviewed annually to ensure it remains effective, current, and aligned with legal, regulatory, and sector best practice. The review will consider feedback from students and staff, learning from cases and incidents, monitoring data, and developments in guidance or legislation.

An earlier review may be undertaken where required in response to changes in legislation, Office for Students requirements, safeguarding concerns, or where monitoring identifies the need for improvement.

Any material changes to this Policy will be approved through QA Higher Education's governance arrangements and communicated to staff and students in a timely and accessible way.



14. Appendices

14.1. Appendix A –

Staff

Staff can access support from their line managers, People Team or Employee Assistance Programme. Further information can be found on the People Team [Hub](#).

Students

Students can access support from the Welfare team. Click [here](#) for the teams contact information or through the SVLO's [Your Safe Space: Report + Support](#)

Student Assistance Programme The Student Assistance Programme provides confidential support for students, including counselling, emotional support, and practical advice. Support is available at any time and can be accessed independently of QA Higher Education, whether or not a disclosure or report has been made.

Link to app: [Wisdom](#) Code to use to register: MHA339939

External Agencies

Organisation	Website	Contact No.
Refuge	https://www.nationaldahelpline.org.uk/	0808 2000 247
Respect (Men's Advice Line)	https://mensadviceline.org.uk/	0808 8010327
Respect (Perpetrator Help Line)	https://respectphonenumber.org.uk/	<u>0808</u> <u>8024040</u>
ADVANCE	https://www.advancecharity.org.uk/	020 8741 7008
Forced Marriage Unit	https://www.gov.uk/guidance/forced-marriage	020 7008 0151
Karma Nirvana	https://karmanirvana.org.uk/	0800 5999 247
Latin American Women's Aid	https://lawadv.org.uk/en/	020 7275 0321
opoka	https://www.opoka.org.uk/	0300 365 1700
Women & Girls Network	https://www.wgn.org.uk/	0808 801 0660



Galop	https://galop.org.uk/	0800 999 5428
Bharosa	https://www.birmingham.gov.uk/info/20095/antisocial_behaviour_and_neighbour_disputes/1370/bharosa_domestic_abuse_service	0121 303 0368
Birmingham LGBT	https://blgbt.org/domestic-violence/	0121 643 0821
Birmingham & Solihull Women's Aid	https://bswaid.org/	0808 800 0028
WAVE	https://washawayvictimeffects.co.uk/	07734 775534
Pankhurst Trust	https://pankhursttrust.org/	<u>0161 660</u> <u>7999</u>
Greater Manchester Domestic Abuse Helpline	http://www.domesticabusehelpline.co.uk/our-services/greater-manchester-domestic-abuse-helpline/	0800 254 0909
Muslim Women's Network	Muslim Women Network (mwnuk.co.uk)	0800 999 5786 / 0303 999 5786
Black sisters	About Southall Black Sisters Southall Black Sisters	
Woman's Trust	https://womanstrust.org.uk/	020 7034 0303
National Centre for Domestic Violence	Domestic Violence & Abuse · Emergency Injunction Service (ncdv.org.uk)	<u>0800 970</u> <u>2070</u>
Ananias foundation	Definitions - Ananias Foundation	
Hestia	Hestia's Domestic Abuse support services	
Women's Aid	www.womensaid.org.uk	0808 2000 247
Rise Against Abuse	https://www.riseagainstabuse.com/our-services	07780377 420
Opoka	https://www.opoka.org.uk/	0300 365 1700
RASASC - Rape & Sexual Abuse Support Centre	Home - RASASC	01483 546400
Into the Light	Into The Light: counselling, support for adult survivors of sexual sbuse	



Rape Crisis	https://rapecrisis.org.uk/get-help/looking-for-information/support-for-men-and-boys/	
Survivors UK	SurvivorsUK We challenge the silence to support sexually abused men	020 3322 1860
Safeline (male survivors of sexual abuse)		0808 800 5005.
Rape crisis Centres	Find a Rape Crisis Centre Rape Crisis England & Wales	0808 802 9999



14.2. Appendix B - Procedures for Reporting, Support, and Case Management

These procedures set out how QA Higher Education responds to disclosures, reports, and concerns relating to harassment, sexual misconduct, and relationship abuse. They should be read alongside the Prevention of Harassment, Sexual Misconduct and Relationship Abuse Policy and related QA Higher Education policies.

These procedures are designed to be supportive, transparent, trauma-informed, fair, and proportionate, and to meet safeguarding, legal, and Office for Students (OfS) requirements.

14.2.1. Principles underpinning these procedures

All actions taken under these procedures will be guided by the following principles:

- the safety, wellbeing, and dignity of all individuals are prioritised;
- individuals are treated with compassion, respect, and fairness;
- choice and autonomy are respected wherever possible;
- action is proportionate and based on risk;
- support is available regardless of whether a formal report is made; and
- confidentiality is maintained, subject to safeguarding and legal duties.

14.2.2. Routes to Support and Raising Concerns

Individuals may choose one or more of the routes below. These routes are distinct and serve different purposes.

Disclosure for Support (Students)

Students may disclose an experience of harassment, sexual misconduct, or relationship abuse by:

- contacting the Welfare Team by email, telephone, or in person; or
- requesting support from a Sexual Violence Liaison Officer (SVLO).
- Submitting a request through [Your Safe Space: Report + Support](#)

Key points about disclosure:

- disclosures are not anonymous;
- students are not required to share full details of their experience;
- disclosure does not automatically lead to a formal report or investigation.

Following a disclosure, a trained member of staff will:

- listen and provide reassurance;
- explain available support options;
- discuss reporting options if the student wishes; and
- agree next steps based on the student's preferences, unless safeguarding action is required.

Anonymous Reporting

Students may submit an anonymous report using QA Higher Education's anonymous reporting route. [Your Safe Space: Report + Support](#)

Anonymous reports:

- allow individuals to share information without providing their identity;
- help QA Higher Education identify patterns, trends, or safeguarding risks; and

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- inform preventative or environmental action.

Limitations of anonymous reporting mean that QA Higher Education may not be able to:

- offer direct support;
- clarify information or gather further evidence; or
- take formal or disciplinary action against another individual.

Anonymous reports will still be reviewed carefully and may be escalated where there are safeguarding concerns. Submitting an anonymous report does not prevent an individual from later seeking named support or making a formal report.

Formal Reporting (Students)

Students may choose to make a formal report in order to request that QA Higher Education considers taking action.

Formal reports may be made:

through QA Higher Education reporting route [Your Safe Space: Report + Support](#)

- with support from the Welfare Team or an SVLO.

On receipt of a formal report:

- the report will be acknowledged;
- an initial safeguarding and risk assessment will be undertaken; and
- interim measures may be considered where appropriate.

Formal reports relating to student conduct are managed in line with this Policy and the Respect for All Policy.

Staff disclosures and reports

Staff who experience or witness behaviour covered by this Policy should follow the Dignity at Work Policy and may seek advice and support from their line manager or the People Team.

Where the disclosure is related to a student, this should be reported using [Your Safe Space: Report + Support](#)

14.2.3. Safeguarding and Risk Management (Student)

Following a disclosure or report, QA Higher Education will assess whether there is:

- an immediate risk of harm;
- an ongoing safeguarding concern; or

a wider risk to the QA Higher Education community.



Where appropriate:

- interim measures may be put in place to protect individuals;
- cases may be referred to the Student Welfare Risk Panel for oversight and risk management; and
- external agencies may be involved where required.

Safeguarding actions are preventative and do not determine the outcome of any investigation or disciplinary process.

14.2.4. Investigation Process

Where a formal investigation is required, the investigation will be carried out by a Student Conduct and Resolutions Officer, who is trained and independent of the parties involved.

The investigation will normally involve:

- informing the Reporting Party and the Reported Party that an investigation is taking place and explaining the process;
- gathering relevant information and evidence in a fair, impartial, and trauma-informed manner;
- providing all parties with the opportunity to give accounts and submit evidence;
- speaking to witnesses where appropriate; and
- reaching findings on the balance of probabilities.

The Student Conduct and Resolutions Officer will prepare a written investigation report setting out findings and recommendations.

Conflict of interest safeguard:

Where a Student Conduct and Resolutions Officer has had prior involvement in a case, has a personal connection, or has any actual or perceived conflict of interest, they will not act as investigator. An alternative, suitably trained investigator will be appointed.

14.2.5. Outcomes and Decision-Making

Following investigation, outcomes may include:

- no further action;
- informal or supportive measures;
- referral to the Student Welfare Risk Panel for ongoing safeguarding oversight; or
- referral to the Student Disciplinary Panel.

Where a potential outcome may include suspension or expulsion, the case will be escalated to the partner University in accordance with agreed governance arrangements.

14.2.6. Police Involvement and Criminal Proceedings

Individuals may choose to report matters to the police at any stage.



QA Higher Education processes are separate from criminal proceedings. Where criminal investigations or court proceedings are ongoing or anticipated, QA Higher Education will take a risk-based approach to whether internal processes proceed, pause, or resume, informed by safeguarding considerations and police advice where appropriate.

The outcome of criminal proceedings does not prevent QA Higher Education from taking action under its own policies.

14.2.7. Support During and After processes

Support is available to all students involved in a matter under this Policy, including:

- the Reporting Party;
- the Reported Party (where a student); and
- witnesses.

Students may access support from:

- the Welfare Team;
- a Sexual Violence Liaison Officer (SVLO); and
- mental health practitioners, where appropriate.

Support is provided to assist with wellbeing, understanding processes, and accessing services. Accessing support does not imply fault or responsibility and is separate from any investigation or disciplinary outcome.

Support remains available throughout and after any process, subject to ongoing need.

Where both the reporting and reported parties are both students, to ensure there is not conflict of interest, different members of the team will be assigned to provide support.

14.2.8. Confidentiality and Information Sharing

Information will be shared only with those who need to know in order to:

- provide support;
- manage risk;
- carry out investigations; or
- fulfil legal or safeguarding responsibilities.

All personal data will be handled in accordance with data protection legislation and QA Higher Education data protection policies.

14.2.9. Record-Keeping and Monitoring

Records will be kept securely and in line with QA Higher Education retention schedules. Anonymised data will be used for monitoring trends, improving practice, and providing assurance through governance arrangements.

