

# SEXUAL VIOLENCE AND SEXUAL MISCONDUCT POLICY

| Document Control Information |                                                  |
|------------------------------|--------------------------------------------------|
| Version control              | 2                                                |
| Owned by:                    | Deputy Director, Centre for Equity and Inclusion |
| Latest amendment on:         | July 2025                                        |
| Approved by:                 | Academic Board.                                  |
| Approved on:                 | 30 July 2025                                     |
| Coming into effect on:       | 1 <sup>st</sup> August 2025                      |
| Review date:                 | July 2028                                        |

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# 1. Introduction

London Metropolitan University is committed to providing a safe, inclusive, and respectful environment for all students, staff, and visitors. This Policy sets out the University's approach to preventing and responding to sexual violence and sexual misconduct, including the processes available for those affected to disclose or report incidents and access support as well as harassment.

The Policy aligns with the University's legal obligations under the [Equality Act 2010](#), the [Sexual Offences Act 2003](#), the [Protection from Harassment Act 1997](#) and the [Office for Students' Condition of Registration E6: Harassment and Sexual Misconduct](#). The implications of [Worker Protection \(Amendment of Equality Act 2010\) Act 2023](#) have also been considered. This policy also reflects our wider commitment to student and staff wellbeing, safeguarding, [freedom of speech](#), and academic freedom within our community.

The University takes a zero-tolerance approach to sexual violence and misconduct. Zero tolerance means that every disclosure or report of sexual misconduct, sexual violence or harassment will be acted upon promptly and where reported, thoroughly investigated. It should be presumed that if a student or staff member harasses or member of our community, that appropriate action will be taken under the relevant policy/procedure, which might include investigations, interventions, safeguards. These actions could potentially result in disciplinary action that could lead to either expulsion or termination of employment.

## 1.1. Purpose of this Policy

This Policy sets out the University's institutional response to sexual violence and sexual misconduct. It affirms our commitment to fostering a safe, inclusive, and respectful environment for all, and outlines the principles that guide our approach to prevention, support, and accountability.

It provides a high-level framework for how the University receives, responds to, and supports disclosures and reports involving students, staff, or visitors.

The Policy promotes consistency of practice, transparency of process, and alignment with legal and regulatory requirements.

This Policy should be read alongside the [Sexual Violence and Sexual Misconduct – Procedures for Students and Staff](#), which provide detailed guidance on reporting, case handling, and available support. Together, the Policy and Procedures form the University's comprehensive framework for addressing sexual violence and misconduct.

## **1.2. University commitment and values**

London Metropolitan University is committed to upholding the dignity, safety, and wellbeing of every member of its community. We aim to create a culture where students and staff feel empowered to speak out, supported when they do, and protected from harm.

We are actively working to prevent and respond to all forms of harassment, bullying, sexual violence, and misconduct — and to provide timely, trauma-informed support to anyone affected. Student and staff safety is a priority, and we are committed to continuous improvement through education, engagement, and accountability

## **1.3. Guiding principles**

The University's response to sexual violence and sexual misconduct is guided by principles of fairness, equity, and respect for all members of our community. We are committed to fostering a survivor-centred, trauma-informed culture in which individuals feel supported to disclose experiences of harm. We adopt a zero-tolerance approach to sexual violence and misconduct in any form, and we hold clear expectations around behavioural norms, accountability, and the right to study and work free from harassment or abuse.

## **1.4. Delivery of the Policy Framework**

This Policy, alongside its accompanying Procedures, outlines how the University will deliver on these commitments. We will provide a learning and working environment in which all members of our community feel safe, valued, and respected. We will set out clear expectations for conduct relating to sexual violence and misconduct. We will ensure that accessible,

confidential support is available to individuals who disclose or report harm. And we will respond to all concerns through a coordinated framework that is timely, transparent, and in line with our legal and safeguarding responsibilities.

## **2. Policy Statement**

### **2.1. Right to safety and community support**

London Met is committed to ensuring that all members of our community have the right to work, live and learn free from all forms of sexual harassment, sexual misconduct, and sexual violence. We are committed to working together as a community of staff, students and visitors to foster an environment that is safe and respects the contributions that each and every one of our community makes.

### **2.2. Recognition of sector wide risks**

London Met acknowledges that sexual violence and sexual misconduct can occur across all parts of the higher education sector, including between students, staff, and external parties. We are committed to fostering a culture of respect, prevention, and accountability through proactive education, clear expectations, and sustained community engagement.

Through ongoing campaigns, training, and partnerships with external specialists, we aim to raise awareness, strengthen understanding, and embed a zero-tolerance approach across our university. Individuals impacted by these behaviours will be supported with care, and their right to disclose or report will be respected at every stage.

### **2.3. Creating a supportive environment**

We want to create a supportive and responsive environment where everyone feels comfortable coming forward and asking for support. There has been an increase in disclosures across the sector. This increase suggests that some individuals feel safe in disclosing information. Our aim is for all our community to feel safe enough to report an incident. All disclosures will be heard and taken seriously, ensuring support for those reporting. Suitable and

timely action will be taken in response to any reports or disclosures of sexual misconduct or sexual violence in line with the policy below.

#### **2.4. Staff training and support responsibilities**

The University will ensure that there are suitable supports in place for all members of our community in the event of a disclosure or report. The University will also ensure that staff who respond to disclosures or reports of sexual violence or sexual misconduct have appropriate training and access to the necessary resources. This includes staff with designated responsibilities across support, casework, or safeguarding teams.

#### **2.5. Disciplinary response and behavioural expectations**

Disciplinary action will be taken if allegations of sexual violence or sexual misconduct are upheld following a formal complaint and investigation under the relevant conduct or disciplinary procedure. Precautionary measures may also be taken at the point of a formal complaint to safeguard our community. A clear statement on behavioural expectations for all students, staff and visitors has been developed and communicated.

#### **2.6. Reporting Mechanisms and monitoring**

The University will ensure that there are clear, accessible, and survivor-centred reporting mechanisms in place, including anonymous and named routes via the Report and Support platform. A “suitable” mechanism is defined as one that is:

- Visible and well-publicised, including through the Single Comprehensive Source of Information (SCSI) in accordance with Condition E6.
- Accessible to all users, including those with disabilities or language barriers.
- User-friendly and trauma-informed, minimising the burden on those disclosing.
- Able to trigger appropriate support and institutional action, whether or not a formal complaint is made.

Effectiveness will be assessed through:

- Monitoring of usage and reporting trends.
- Feedback from reporting parties and support staff.

- Analysis of demographic access data to identify engagement gaps.
- Annual review and update to ensure compliance with regulatory expectations and evolving sector standards.

## **2.7. Consultation and co-creation**

In developing this policy, the University has consulted widely across its community of students and staff and utilised expert advice through sector insights and an external consultant.

Specifically, London Met' Students' Union is a key partner in raising awareness, promoting training, and supporting individuals affected by sexual misconduct. The University will continue to work collaboratively with the Students' Union to co-design campaigns, improve visibility of support services, and ensure student voice is central to policy development and implementation

## **2A. Freedom of Speech and Academic Freedom**

London Metropolitan University recognises the paramount importance of Freedom of Speech and Academic Freedom. The University acknowledges their vital role in fostering a culture of vigorous and open debate within the law, while being mindful of the University's values as stated in its [Strategy](#).

While these freedoms encompass even unpopular or challenging ideas, they do not extend to violence, threats, intimidation, or discriminatory speech. We champion honest dialogue, respectful engagement with diverse viewpoints, and responsible expression within a safe and inclusive community.

Our detailed [Freedom of Speech Code of Practice](#) provides further guidance on upholding these principles. In the event of a conflict between the contents of this policy and the [Freedom of Speech Code of Practice](#), the provisions of the [Freedom of Speech Code of Practice](#) will prevail.

Any mention of 'harassment' under this policy is defined as either:

Harassment, including sexual harassment, includes unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or

creating an intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics: age; disability; gender reassignment; race; religion or belief; sex; and sexual orientation; and/or

- a course of conduct conducted on at least two occasions that harasses one other person, or a course of conduct that harasses two or more persons at least once each. References to harassing a person include alarming the person or causing the person distress.’
- When applying the definition in paragraph 4, as under section 1 of the Protection from Harassment Act 1997, it will usually only be considered as harassment if:
  - The person knows the conduct amounts to harassment of the other; or
  - A reasonable person in possession of the same information would think the course of conduct amounted to harassment of the other person.

### **3. Scope of the Policy**

#### **3.1. What the policy covers**

This policy applies to all forms of sexual violence and sexual misconduct, whether they constitute a criminal offence or breach University regulations. It includes — but is not limited to — unwanted conduct of a sexual nature, in person or online, that causes harm, distress, intimidation, or violates a person’s dignity. The examples listed in this policy are illustrative and not exhaustive.

#### **3.2. Who the Policy Applies To (students, staff, third parties)**

This policy applies to every member of the London Metropolitan University community. This includes all students, regardless of mode or level of study; all categories of staff, including academic, research, and professional services personnel; and individuals engaged in university activities, such as contractors, alumni, visiting academics, or collaborators. This policy also applies to students or staff from partner institutions when they are engaged in activity governed by the University, or experience misconduct on university

premises or in relation to joint provision. This policy extends to activities connected to or facilitated by the Students Union, including events, campaigns, societies, and representative functions – whether these take place on or off campus, in person or online.

### **Note on Students' Union Autonomy**

While the London Metropolitan Students' Union (LMSU) is a separate organisation to London Metropolitan University, legally responsible for its own governance and complaints procedures. LMSU operates in close partnership with the University and shares responsibility for fostering a safe and respectful community. This policy note applies to the sharing of relevant student information and activity that concerns the University's duty of care and conduct procedures, including but not limited to events, student representation and student advice services.

Formal partnership agreements, including a Memorandum of Understanding (MoU) exist to ensure alignment on safeguarding, conduct expectations, and joint procedural responses to sexual violence and misconduct. The Data Sharing Agreement between London Metropolitan University and London Metropolitan University Students' Union 2022 sets out the terms under which personal data of registered students' may be shared, and the specific purposes for which that data can be used.

### **3.3. Partner Institutions and Shared Responsibilities**

The policy applies equally to students from partner institutions. The University also recognises that students based at partner institutions may choose to disclose incidents to London Met staff. In such cases, the University will liaise with the partner institution to determine an appropriate course of action and ensure safeguarding, support, and investigation protocols are followed.

Where relevant, this response will be guided by existing collaborative agreements or Memoranda of Understanding (MOUs) between the University and its partners, which set out shared responsibilities for managing

disclosures, supporting students, and initiating appropriate investigations. In the absence of formal arrangements, the University will act to ensure the reporting party receives timely support and that safeguarding duties are fulfilled in consultation with the partner institution.

### **3.4. Contexts in Which the Policy Applies**

This policy applies to incidents of sexual violence or sexual misconduct that take place both on and off university premises, including those that occur outside of standard academic hours. It extends to any setting or context considered part of “normal University business”, which includes but is not limited to:

- Field trips, placements, study abroad or international mobility programmes
- Student society events and sports activities, whether on or off campus
- Work-related functions or industry-facing events facilitated by the University
- Online platforms, including university-sanctioned social media groups or learning environments
- University accommodation and third-party managed halls

The University’s responsibilities also apply to digital communications and online harassment involving members of the University community, where the behaviour breaches this policy or impacts the wellbeing or safety of students or staff.

### **3.5. Technology Facilitated and Online Harassment**

The policy explicitly recognises that sexual misconduct may be perpetrated through the use of digital technologies. This includes behaviours such as image-based abuse, non-consensual sharing of intimate media, upskirting, cyberstalking, and the production or circulation of sexually explicit material without consent—including content created using artificial intelligence or digital manipulation. Such behaviour is regarded as equally serious as in-person misconduct and may be subject to internal disciplinary procedures and referral to external authorities.

### **3.6. Criminal Offences and University Jurisdiction**

Where allegations relate to behaviour that may also constitute a criminal offence, the University will support the individual in accessing external reporting routes. The decision to report to the police rests with the individual, except in circumstances where there is a safeguarding duty or a risk to others. The University may take precautionary action to protect its community and may conduct internal disciplinary proceedings independently of any police investigation or legal outcome. This policy operates within the framework of UK law, including the [Equality Act 2010](#), the [Sexual Offences Act 2003](#), the [Protection from Harassment Act 1997](#), and the [Online Safety Act 2023](#).

### **3.7. Definition of Consent**

Consent, as referred to in this policy, follows the legal definition set out in Section 74 of the [Sexual Offences Act 2003](#): a person consents if they agree by choice, and have the freedom and capacity to make that choice. The absence of physical resistance, silence, or lack of protest does not imply consent. Consent must be actively and continuously given and can be withdrawn at any time.

### **3.8. Disproportionate Impact and Structural Barriers**

The University recognises that sexual violence and sexual misconduct can affect anyone, but that some individuals may face higher risks due to structural inequalities. Those marginalised by race, gender identity, sexual orientation, disability, socioeconomic background, faith, or immigration status may experience additional barriers to reporting and accessing support. This policy reflects the University's commitment to removing those barriers and ensuring an equitable, trauma-informed response for all members of the community.

## **4. Definitions**

### **4.1. Core Terminology**

For the purposes of this policy, sexual violence and sexual misconduct refer to any unwanted or attempted unwanted conduct of a sexual nature, whether in person or via digital/online means. These acts may constitute a breach of university policy, a criminal offence, or both.

Key legal definitions include:

- **Sexual Harassment:** Unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment ([as defined in Section 26\(2\) of the Equality Act 2010](#)).
- **Sexual Assault:** Intentional sexual touching without consent, including through clothing, and regardless of perceived severity ([as defined in Section 3 of the Sexual Offences Act 2003](#)).
- **Rape:** Non-consensual penetration of the vagina, anus or mouth with a penis ([as defined in Section 1 of the Sexual Offences Act 2003](#)).

The University recognises that some experiences may not meet the threshold for a criminal offence but still constitute serious misconduct within our institutional context.

#### 4.2. Sexual Misconduct Involving Physical Contact

Sexual misconduct that involves physical contact may include a range of unwanted actions, such as engaging in or attempting to engage in sexual acts without consent, kissing or touching someone without their agreement, or removing another person's clothing without their permission. This also includes coercive behaviour where consent is manipulated or withdrawn, or where contraception is interfered with.

Behaviours such as the non-consensual sharing of sexual images or video footage, offering resources or rewards in exchange for sexual activity, and intimidating someone into sexual contact are also captured within this definition.

**Note:** This list is not exhaustive. Other behaviours involving physical contact may also be considered sexual misconduct under this policy.

#### 4.3. Sexual Misconduct Not Involving Physical Contact

Not all misconduct involves physical touch. Sexual harassment or misconduct without contact may include indecent exposure, repeated

sexualised comments, sexually explicit jokes, staring or leering, or creating an environment that feels sexually intimidating or degrading.

Sexual misconduct not involving physical contact may constitute unlawful harassment under the [Equality Act 2010](#), or criminal harassment under the [Protection from Harassment Act 1997](#). This includes any unwanted conduct of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Persistent behaviour, such as following someone, making sexual remarks, or other unwanted sexualised attention, may also fall within the scope of harassment as defined by law.

This list is not exhaustive. Any conduct that reasonably causes distress, intimidation, or degradation may fall within the scope of this policy.

#### **4.4. Online and Technology Facilitated Sexual Misconduct and Harassment**

Sexual misconduct may also be carried out via digital platforms and emerging technologies. This includes behaviours such as sending unsolicited sexual messages or images, storing or distributing sexually explicit material using University systems, covertly recording or photographing under another person's clothing (commonly referred to as "upskirting"), engaging in cyberstalking or persistent unwanted online contact, and creating or sharing deepfake or AI-generated sexual content without consent. These actions may constitute sexual harassment, stalking, or other criminal offences under legislation such as the [Protection from Harassment Act 1997](#). All such conduct is prohibited under this Policy and will be investigated, regardless of whether it occurs using University systems or external platforms.

#### **4.5. Key Terms**

Definitions of operational terms such as [reporting party](#), [reported party](#), [disclosure](#), [report](#), *third party*, [vexatious reporting](#), and [malicious reporting](#) can be found in [Annex B: Glossary of Key Terms](#).

## 5. Our commitment

 We take a whole-institution approach to prevention and response, embedding clear behavioural expectations, championing informed consent, and providing a robust framework for disclosure, reporting, and resolution. Our response is shaped by our institutional values, legal duties, and our overarching responsibility to safeguard students and staff.

We understand that trust is central to an effective response. For that reason, all disclosures are handled with sensitivity, care, and clarity. Individuals are supported to make informed decisions about next steps, including whether to make a formal report. Access to support services is available throughout, and staff with responsibility for responding to disclosures are trained to do so with professionalism and compassion.

When necessary, the University will take proportionate action — including precautionary or disciplinary measures — to uphold safety and conduct standards. Our actions align with the [Equality Act 2010](#), the [Sexual Offences Act 2003](#), the [Care Act 2014](#) (in relation to safeguarding responsibilities), and the principles of natural justice. We do not use non-disclosure agreements to silence those who speak out.

## 6. Equality, Diversity and Inclusion

London Metropolitan University recognises that sexual violence and sexual misconduct are shaped by systems of inequality. Certain groups may face higher risks of harm and additional barriers to reporting due to structural discrimination. This includes, but is not limited to, individuals minoritised by race, gender identity, sexual orientation, disability, age, religion or belief, language, or socio-economic status.

The University is committed to responding to all disclosures in a manner that is respectful, inclusive, and aligned with our legal responsibilities under the [Equality Act 2010](#) and the [Protection from Harassment Act 1997](#). Our prevention, education, and support work is

informed by principles of equity and social justice. Further information about our approach to equity and diversity is available on our [Equality and Diversity webpages](#). We will continue to work across the institution to address structural barriers and ensure our approach reflects the diverse experiences of our community.

## **7. Responsibilities**

Ensuring a safe, respectful, and responsive environment requires coordinated effort across the University. While all members of the community share responsibility for upholding the standards set out in this policy, particular roles carry distinct duties in prevention, response, and oversight.

### **7.1. Board of Governors**

The [Board of Governors](#) holds ultimate responsibility for institutional governance. It ensures that appropriate frameworks are in place to prevent and address sexual misconduct and that the University meets its regulatory obligations under the [OfS Conditions of Registration](#) and other legal frameworks.

The Board will assurance through termly reporting on the implantation of this policy, including anonymised data, risk management activity and safeguarding updates. Responsibility for coordinating these reports lies with the Deputy Director for the Centre for Equity and Inclusion, working in collaboration with the University Secretary, Student Casework, and relevant safeguarding leads.

### **7.2. Deputy Director of the Centre for Equity & Inclusion**

The Deputy Director of the CEI holds senior responsibility for this policy and provides strategic leadership for the University's sexual violence and misconduct framework, ensuring compliance with the regulatory requirements of Condition E6, maintaining an accessible and coherent reporting system, and driving continuous improvement through a trauma-informed, survivor-centred approach.

### **7.3. Associate Pro-Vice Chancellor (Student Success) or nominee**

The Associate Pro Vice-Chancellor (Student Success) provides strategic oversight of student wellbeing and safeguarding, ensuring that policies, support structures, and response mechanisms align with institutional priorities and sector expectations. The Associate PVC Student Success is responsible for ensuring cross-departmental collaboration and for championing a culture of safety, dignity, and equity.

#### **7.4. Head of Student Services**

The Head of Student Services oversees the operational delivery of this policy, including coordination of trained staff with responsibilities for sexual misconduct support and response, the effective use of the [Report and Support](#) platform, and the management of wellbeing and safeguarding services for students. This role is also responsible for ensuring that timely and appropriate support is available to students affected by sexual misconduct.

#### **7.5. Staff Providing Sexual Misconduct Support**

Designated and suitably trained staff play a central role in the University's response to disclosures of sexual violence or misconduct. They are responsible for providing timely, informed, and compassionate support to students who come forward, including helping individuals understand their options, facilitating referrals to internal and external services, and liaising with academic or accommodation staff where required. They are trained to offer trauma-informed and identity-sensitive support.

#### **7.6. Line managers and Heads of Department**

All managers and senior staff are responsible for ensuring their teams understand this policy and the expectations it sets. They are expected to foster a respectful culture within their areas, ensure staff have access to relevant training, and respond promptly to concerns. Where disclosures are made involving staff members, line managers must ensure such reports are escalated appropriately and in line with HR procedures.

#### **7.7. Adjustments for Disabled Students and Staff**

The University recognises that disabled students and staff may require specific adjustments in the context of support, disclosure, or disciplinary processes. It is the responsibility of the relevant support teams, working with line managers or course leaders, to ensure that reasonable adjustments are made in line with the [Equality Act 2010](#) and institutional guidance.

#### **7.8. All Staff and Students**

Every member of the University community has a responsibility to contribute to a culture of safety and respect. Staff and students are expected to familiarise themselves with this policy, to behave in a way that upholds the dignity of others, and to report any concerns or breaches of this policy through appropriate channels. Training and awareness materials will be provided to support this understanding.

#### **7.9. Human Resources and Senior Leadership**

The appropriate senior leader or director is responsible for managing the case in accordance with the [Staff Disciplinary Policy](#), the [Staff Grievance Procedure](#) and the [Harassment Policy](#)

## **8. Report and Support**

London Metropolitan University encourages individuals who have experienced or witnessed sexual violence or misconduct to come forward and are committed to ensuring that all disclosures are handled with care, professionalism, and respect.

#### **8.1. Disclosure and Reporting: Key Distinctions**

A [disclosure](#) is when an individual shares an experience of sexual violence or misconduct but may not wish to initiate formal proceedings. A [report](#), by contrast, is a formal request for action under the University's disciplinary or

grievance procedures. Both disclosures and reports are taken seriously and responded to appropriately.

## **8.2. Reporting Routes and Support Pathways**

The University provides a secure and accessible digital platform — [Report and Support](#) — which allows students and staff to make disclosures of sexual misconduct. At present, disclosures via this platform are submitted anonymously, and individuals cannot currently initiate formal reports through this system.

Where disclosures include contact details, trained staff in Student Services may follow up to offer a confidential conversation, help individuals understand their options, and triage next steps. Formal reporting routes, such as through the Student Conduct Regulations or HR processes, remain separate. Cases may also be escalated from initial disclosures following discussion and risk assessment by relevant staff....a trained staff member responsible for supporting disclosures will offer a confidential meeting to explore next steps and support options.

## **8.3. Options Following a Disclosure**

Following a disclosure, individuals can:

- Access support without initiating a formal process
- Request adjustments to learning, living, or working arrangements
- Be referred to internal services such as counselling or academic support
- Be referred to external services, including [Rape Crisis](#), [SurvivorsUK](#), or the police, or other appropriate authorities, such as social servicesConsider submitting a formal report through the [Student Conduct Policy](#) and procedure to the University

There is no requirement for individuals to report to the police or pursue internal proceedings to access support. The University aims to respect the choices of those who disclose, including whether they choose to report to

police. However, where there is a lawful basis, such as where there are credible concerns of harm to an individual or others, escalate matters through Safeguarding procedures. This may result in external referrals to relevant authorities.

#### **8.4. Formal University Investigations**

Where a report is made and investigated under the [Student Conduct Policy](#) or [Student Complaints Procedure](#), or relevant staff disciplinary processes, the University will ensure that both the reporting and reported parties are treated fairly and kept informed throughout. Investigations will be conducted in a timely and sensitive manner, with support offered to all parties involved.

All parties involved in a formal investigation have the right to appeal procedural decisions or outcomes, in accordance with the University's [Student Appeals](#) Procedure, or [Staff Grievance](#) and [Staff Disciplinary Procedure](#). These mechanisms ensure that concerns about fairness or process are addressed transparently and without prejudice.

#### **8.5. Receiving a Disclosure: Responsibilities of Staff**

All staff have a duty to respond appropriately when a disclosure is made. This includes listening without judgement, offering reassurance, signposting to support services, and avoiding actions that could compromise any future investigation. Staff should refer cases to trained colleagues who hold responsibilities for handling disclosures and offering support, such as staff in the Student Conduct team or Local Safeguarding Officers through the respective procedures. In a crisis or emergency, such as when someone is at risk immediate harm, staff should phone 999 immediately. To use an internal phone, add an additional 9 and dial 9999.

Staff must then also contact the University Security Team on extension 3333. This is to ensure that the Security Team can take the necessary steps depending on the emergency and to also enable access to the building for the emergency services.

#### **8.6. Investigator Training and Procedural Awareness**

The University will ensure that individuals responsible for investigating cases of sexual misconduct — including those working in HR, the Student Conduct team, and relevant safeguarding or procedural roles — understand the sensitive nature of the issues involved and are equipped to handle cases fairly and in line with applicable legal and regulatory duties. Investigators will receive training appropriate to their roles, including how to support parties impartially and apply procedural fairness.

### **8.7. Precautionary Measures and Risk Management**

In some cases, the University may implement precautionary measures while an investigation is ongoing, to protect the safety and wellbeing of all parties. These may include temporary changes to timetables, housing, supervisory arrangements, or contact restrictions. Such measures are not disciplinary in nature and are reviewed regularly to ensure they remain proportionate.

### **8.8. Reporting to the Police**

The decision to report an incident to the police rests with the individual who has experienced the harm. Where such a report is made, the University will cooperate with any investigation, while maintaining support for all parties. Internal proceedings may be paused or adapted to avoid interference with legal processes, but the University retains the right to take appropriate action independently of the criminal justice system.

### **8.9. Staff- Related Misconduct**

Allegations involving members of staff will be managed through the relevant HR policies and procedures. The University is committed to transparency, fairness, and accountability when handling such cases, and will ensure that appropriate safeguarding and support mechanisms are in place throughout. This may include risk assessments, temporary adjustments to duties or workspaces, referral to internal or external support services, and engagement with safeguarding leads where necessary.

### **8.10. Safeguarding Considerations**

Where a disclosure raises concerns about a child, a vulnerable adult, or an immediate risk of harm to self or others, the University has a legal obligation to act. In such cases, appropriate safeguarding procedures will be followed, which may include sharing information with statutory bodies or taking steps to protect those at risk.

#### **8.11. Escalation from Disclosure to Report**

If an individual who has made a disclosure later chooses to submit a formal report, they will be supported to do so in a timely and accessible way. In situations where a safeguarding risk is identified, the University may initiate a formal report without the individual's consent, in accordance with legal duties. In all cases, the individual will be kept informed and supported throughout.

#### **8.12. Unfounded, Vexatious or Malicious Reports**

The University treats all disclosures and reports seriously and acknowledges the courage it may take to come forward. No action will be taken against any individual who makes a disclosure or report in good faith, even if the concern is later found to be unsubstantiated. However, the University also has a duty to safeguard its procedures from misuse.

Further detail is available in [Annex B: Glossary of Key Terms](#) and in the accompanying [Sexual Violence and Sexual Misconduct Procedures for Students and Staff](#) (Section 6.1).

#### **8.13. Use of Non-Disclosure Agreements (NDAs)**

The University does not use non-disclosure agreements to prevent individuals from speaking about their experiences of sexual violence, misconduct or harassment. This commitment reflects sector guidance and the University's belief in the importance of transparency and survivor agency.

#### **8.14. Related HR Procedures and Grievances**

Where reports of sexual misconduct intersect with grievances, disciplinary issues, or whistleblowing procedures involving staff, the University will ensure that appropriate routes are followed. These processes will be handled in a coordinated and timely manner, with advice from Human Resources and legal counsel where necessary.

## **9. How to Make a Disclosure of Sexual Violence and Misconduct**

London Metropolitan University recognises that coming forward to share an experience of sexual violence or sexual misconduct can be difficult. Individuals may feel uncertain, overwhelmed, or concerned about confidentiality, consequences, or whether their experience “counts.” The University affirms that all disclosures are taken seriously and responded to with care, discretion, and dignity.

### **9.1. Using the Report and Support Platform**

The University offers a secure and accessible platform — [Report and Support](#) — where students and staff can disclose incidents of sexual violence or misconduct. Disclosures can be submitted anonymously or with contact details. When contact details are provided, a trained staff contact will follow up to offer a confidential discussion to explain support options and, if appropriate, next steps.

The platform is available online 24/7 and can be used to:

- Share a personal experience
- Report on behalf of someone else
- Flag concerns about the conduct of a peer, colleague, or third party

The system allows individuals to remain in control of their disclosure and whether it leads to further action.

### **9.2. Disclosing to a member of staff**

Students and staff may choose to disclose an incident of sexual violence or sexual misconduct to a trusted member of the University community — such as a personal tutor, line manager, supervisor, or a member of Student Services. Staff are not expected to investigate or judge the situation, but are required to listen, respond with empathy, and signpost the individual to appropriate support — typically by connecting them with a trained colleague who supports disclosures, a safeguarding lead, or Human Resources in the case of staff-related concerns..... connecting them with a trained colleague who supports disclosures, or with a safeguarding lead as appropriate.

All staff receive guidance and/or training on how to respond to disclosures in a way that is non-judgemental, trauma-informed, and appropriate to their role. This is delivered through staff induction and ongoing mandatory training linked to the University's safeguarding and EDI responsibilities. Staff can also access further advice or emotional support when needed, particularly if they find a disclosure distressing or complex to manage.

### **9.3. Support following a disclosure**

Following a disclosure, individuals can access a range of support options. These may include:

- Wellbeing, counselling, or therapeutic services
- Workplace or academic adjustments, such as changes to duties, deadlines, supervision, or learning environments.
- Steps to avoid contact with the reported party
- Signposting to external specialist services, (e.g. [Rape Crisis](#), [SurvivorsUK](#), domestic violence organisations)
- Guidance on making a police report or initiating formal University procedures.

Support will be tailored to individual circumstances and is subject to the availability of internal and external resources. Staff are expected to signpost appropriately, and all members of the university community are encouraged to familiarise themselves with the support available.

These measures are available regardless of whether a formal report is made. The University will take steps to ensure that any adjustments uphold the safety, dignity, and progression of the individual. Where possible, arrangements will be agreed in consultation with the person affected and reviewed regularly to reflect any changes in need or circumstance.

#### 9.4. Related Information

This policy operates alongside a range of university policies, frameworks, procedures, and guidance documents. Together, these define the expectations, responsibilities, and support systems that underpin a safe and inclusive institution. Where relevant, individuals involved in disclosures or reports of sexual misconduct may also be referred to the following policies and resources:

- [\*\*Student Code of Conduct\*\*](#) – Sets out the behavioural expectations of all students and the procedures for addressing misconduct.
- [\*\*Staff Disciplinary Procedure\*\*](#) – Outlines the process for managing allegations of misconduct involving staff members.
- [\*\*Student Complaints Policy\*\*](#) – Provides guidance on how students can raise concerns or complaints about their university experience.
- [\*\*Safeguarding Policy\*\*](#) – Sets out the University's legal and procedural obligations for protecting children and vulnerable adults.
- [\*\*Equality and Diversity Policy\*\*](#) – Establishes the University's commitment to fair treatment and inclusion, in compliance with the [Equality Act 2010](#).
- [\*\*Fitness to Study Policy\*\*](#) – Addresses circumstances where a student's health, wellbeing, or behaviour affects their ability to engage with their studies.
- [\*\*Freedom of Speech Code of Practice\*\*](#) – Affirms the University's legal duty to uphold freedom of expression while safeguarding community safety and wellbeing.
- [\*\*Digital Conduct and Online Harassment Guidance\*\*](#) Digital conduct guidance is currently being developed to provide clear expectations around online behaviour, including managing incidents of

cyberharassment and digital abuse. In the interim, students and staff are encouraged to report any online misconduct via the [Report and Support platform](#) or by contacting a safeguarding lead.

- [Data Protection Policy](#) – Explains how personal data is collected, stored, and used in line with GDPR and relevant UK data protection laws.

In cases where this policy intersects with other internal procedures, the University will coordinate responses to ensure clarity, consistency, and a trauma-informed approach for all parties involved.

All disclosures and reports are handled with the utmost confidentiality, in line with relevant data protection and safeguarding legislation. Information is shared strictly on a need-to-know basis, with sensitivity to the safety, dignity, and preferences of the individuals concerned. The processing of personal data is governed by the University's [Data Protection Policy](#) and is compliant with the [UK General Data Protection Regulation](#) (UK GDPR). Where risk of harm or safeguarding concerns are identified, the University will act in accordance with its [Safeguarding Policy](#) and escalate appropriately to internal or external authorities.

## 10. Monitoring and Review

The University is committed to ensuring that this policy remains current, effective, and aligned with legal, regulatory, and sector-wide developments. As part of our duty of care and governance obligations, we will regularly review and evaluate the policy and its associated procedures.

This policy will be reviewed on an annual basis by the [Centre for Equity and Inclusion](#), in collaboration with the University Secretary Office, [Student Services](#), Human Resources, and Academic Registry. Where required, interim updates will be made in response to legislative changes, sector guidance (such as from the OfS or [Universities UK](#)), or internal findings from case reviews and student or staff feedback.

The following indicators will inform our assessment of the policy's effectiveness:

- The number and nature of disclosures and reports received, including through the [Report and Support](#) platform
- Timeliness and outcomes of case handling
- Feedback from students and staff who engage with the process
- The accessibility and visibility of the policy and associated support services
- The adequacy and uptake of training by staff and students
- Referrals to internal and external services and user satisfaction with those pathways

Anonymised, aggregated data will be reported annually to the [Board of Governors](#) and [Senior Leadership Team](#) to inform institutional decision-making and resource planning. Data will be disaggregated where possible to help the University identify and address patterns of inequity or disproportionate impact.

Concerns about how this policy has been applied may be raised through existing internal routes, including the Student Complaints Procedure, the Staff Grievance Procedure, or safeguarding reviews.

The University recognises the need for improved transparency and consistency in responding to such concerns, particularly in relation to staff-related complaints. Work is underway to review how data is collected and analysed across relevant procedures, and how institutional learning is shared. Further consultation will take place to determine appropriate mechanisms for oversight and reporting.

[OBJ]

## 11. Training and Awareness

Preventing sexual violence and responding effectively to disclosures and reports requires sustained education, training, and cultural change. London Metropolitan University is committed to ensuring that all members of the community have access to training, resources, and guidance that promote respectful relationships and equip individuals to respond appropriately to harm.

This includes a strong emphasis on consent education and active bystander awareness, which are recognised as essential components of a safe and inclusive university environment. These elements are embedded across the student journey and supported by sector-leading digital tools, campaigns, and staff development. From 2026, engagement with this content will form part of the University's core expectations for students and will support compliance with wider sector requirements, including the OfS Condition of Registration E6.

#### **11.1. Staff Training**

All staff are expected to complete core training on equality, dignity, and sexual misconduct prevention as part of their induction and continuing professional development. This includes training on:

- Understanding sexual violence and misconduct
- Responding to disclosures with care and accuracy
- Recognising signs of harm and escalating safeguarding concerns
- Maintaining confidentiality and professional boundaries

Additional role-specific training will be provided for those in designated positions of responsibility, including line managers, senior leaders, investigators, caseworkers, safeguarding leads, and staff with designated responsibilities for supporting students and staff who disclose sexual misconduct. This may include trauma-informed practice, identity-sensitive support, legal obligations, and procedural fairness.

Human Resources and the [Centre for Equity and Inclusion](#) will oversee the monitoring and evaluation of training uptake and effectiveness.

## **11.2. Community Lead Review and Evaluation**

The University seeks to enhance how it responds to and prevents sexual misconduct through ongoing review and engagement. This includes analysing anonymised data, evaluating training programmes, and inviting feedback from students, staff, and relevant partners.

Where appropriate, we engage with survivor-informed networks, student representatives, and other community perspectives to inform our approach.

Review activity will be proportionate to available resources and will be reported through existing safeguarding and EDI channels. Partnerships that support this work may be developed and reviewed as part of wider institutional commitments to equity and inclusion.

## **11.3. Student Awareness**

Students will be supported to understand their rights, responsibilities, and options through:

- Online training modules embedded in enrolment or orientation processes
- Consent and active bystander education as part of student induction or academic engagement
- Targeted awareness campaigns delivered in partnership with the [Students' Union](#) and relevant student societies
- Ongoing visibility of the [Report and Support](#) platform and wellbeing services

Efforts will be made to ensure that all training and awareness activity is accessible, inclusive, and responsive to the diverse experiences of the student body. While current training is not mandatory for students,

## **11.4. Evaluation and Continuous Improvement**

The University will assess the reach and impact of its training and awareness work through feedback mechanisms, engagement data, and qualitative insights. This evidence will inform future training design and resource allocation. Content will be reviewed regularly to reflect changes in legislation, sector guidance, emerging risks (e.g. technology-facilitated abuse), and student or staff needs.

Through this training and awareness strategy, the University aims to foster a culture in which sexual violence and misconduct are proactively addressed, and where all members of the community feel empowered to intervene, seek support, and uphold the principles of dignity and respect.

## Annex A: Reporting and Disclosure Process

### Named Senior Responsibility

The Deputy Director of the Centre for Equity and Inclusion leads the University's approach to tackling sexual violence and misconduct. They have overall responsibility for the strategic direction and coordination of this. This includes:

- Ensuring the University's approach remains compliant with the Office for Students' *Condition of Registration E6: Harassment and Sexual Misconduct*
- Maintaining the integrity, coherence, and accessibility of the disclosure and reporting framework
- Overseeing policy development, risk monitoring, and institutional reporting on sexual misconduct and harassment
- Providing leadership on continuous improvement, alignment with sector guidance, and support for a trauma-informed, survivor-centred approach

Operational delivery and case management responsibilities are held by designated safeguarding leads, and Student Casework teams.

### Figure 1: Reporting and Disclosure Process Flowchart

This flowchart outlines the steps in the University's approach to disclosures and reports of sexual violence or sexual misconduct, alongside the individuals or roles involved at each stage.

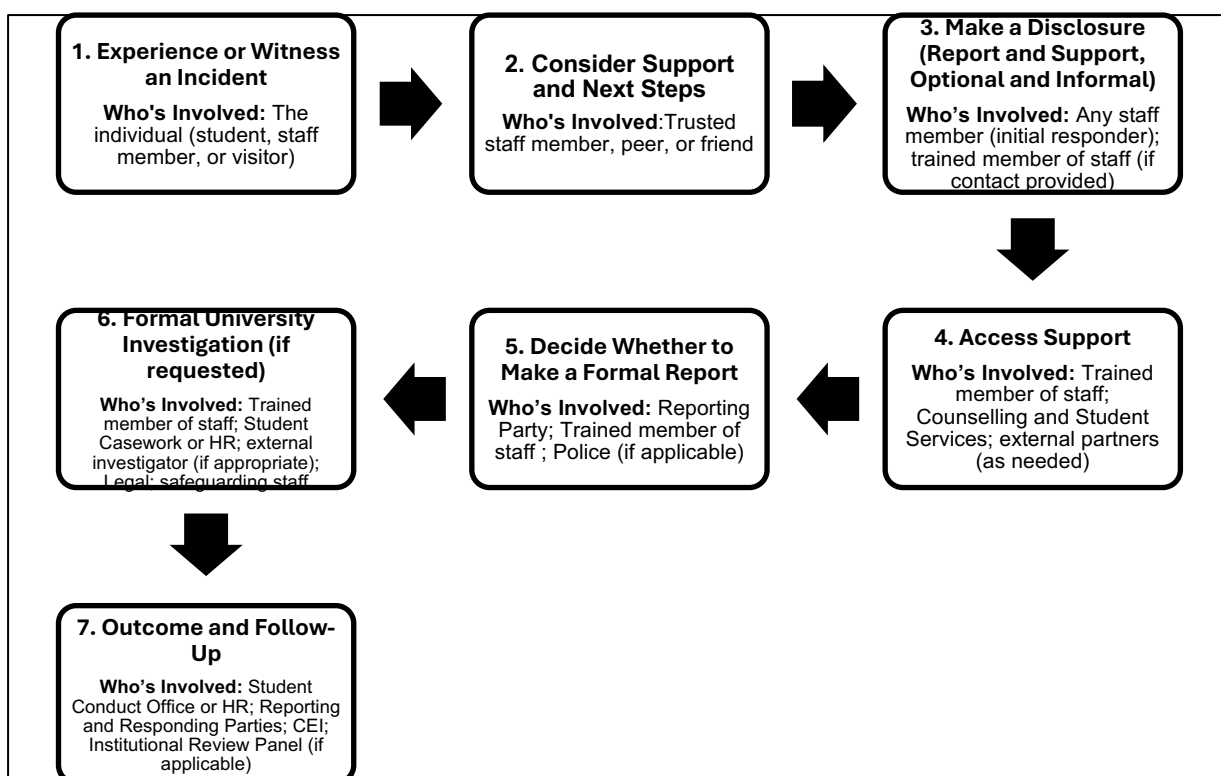


Figure 1: Reporting and Disclosure Process Flowchart.

### Step 1: Experience or Witness an Incident

An individual experiences or becomes aware of behaviour that may constitute sexual violence or sexual misconduct. This may occur on campus, off campus, or online.

**Who's Involved:** The individual (student, staff member, or visitor)

### Step 2: Consider Support and Next Steps

The individual may:

- Seek immediate emotional or practical support
- Speak to a trusted person (e.g. tutor, colleague, friend)
- Explore whether they want to disclose or report the incident

**Who's Involved:** Trusted staff member, peer, or friend

### **Step 3: Make a Disclosure (Informal)**

Disclosures are informal and do not trigger an investigation. They can be made:

- Via the [Report and Support platform](#) (with or without contact details)
- To any trusted member of university staff

If the disclosure is made with contact details:

- A trained member of staff responsible for responding to disclosures or reports of sexual violence or misconduct will offer a confidential appointment
- The individual can discuss support options and next steps

If anonymous:

- The University may use the information for monitoring but cannot offer individual follow-up
- All staff receiving a disclosure must respond empathetically, avoid judgment, and refer the individual to a trained member of staff responsible for responding to disclosures or reports of sexual violence or misconduct will offer a confidential appointment, or safeguarding officer.

**Who's Involved:** Any staff member (initial responder); a trained staff member with responsibilities for responding to disclosures (if contact provided)

### **Step 4: Access Support**

A trained member of staff responsible for responding to disclosures or reports of sexual violence or misconduct will explain available support options and facilitate access to:

- Counselling or wellbeing services
- Academic or workplace adjustments

- External agencies (e.g. SARCs, Rape Crisis)
- Police liaison (if requested)

Support is available **regardless of whether a formal report is made.**

**Who's Involved:** a trained staff member with responsibilities for responding to disclosures ; Counselling and Student Services; external partners (as needed)

### **Step 5: Decide Whether to Make a Formal Report**

The individual may choose to:

- Take no further action
- Submit a formal report to the University
- Report the incident to the police
- Pursue both internal and external options in parallel

At all times, the decision rests with the individual. A trained staff contact will support them to make an informed choice.

**Who's Involved:** Reporting Party; trained staff contact; Police (if applicable)

### **Step 6: Formal University Investigation (if requested)**

If a formal report is made:

- A trained staff contact will convene an exploratory meeting to assess risk, determine support needs, and agree next steps
- The investigation will be conducted under the relevant procedure:
- [Student Conduct Regulations](#) (if the responding party is a student)
- [Staff Disciplinary Procedure](#) (if the responding party is a staff member)

Precautionary measures may be introduced, including timetable adjustments, relocation of teaching spaces, or temporary suspension.

**Who's Involved:** trained staff contact; Student Casework or HR; external investigator (if appropriate); Legal; safeguarding staff

## **Step 7: Outcome and Follow-Up**

Following an investigation:

- The reporting party will be informed of the outcome
  - Sanctions may be applied if a breach is upheld
- Support remains available for all parties
  - An anonymised “lessons learned” review may be conducted to inform institutional improvements

**Who’s Involved:** Student Conduct Office or HR; Reporting and Responding Parties; CEI; Institutional Review Panel (if applicable)

## **Annex B: Glossary of Key Terms**

### **Anonymous Reporting or Disclosure**

The option to share information about an incident without identifying oneself. While anonymous disclosures limit the University's ability to investigate specific cases, they contribute to institutional monitoring and may inform broader safeguarding actions.

### **Consent**

As defined by the Sexual Offences Act 2003, a person consents if they agree by choice and have the freedom and capacity to make that choice. Consent must be clearly and freely given and can be withdrawn at any time.

*See also: Section 8.11A of this Policy and Section 6.1 of the University's Procedures for guidance on the handling of malicious or vexatious reports.*

### **Disclosure**

The sharing of information about an experience of sexual violence or sexual misconduct. A disclosure may be made in confidence and does not necessarily trigger a formal investigation or complaint process. It allows individuals to access support, advice, or information about their options.

### **Malicious Reporting**

A knowingly false report submitted with intent to deceive or cause harm. If a report is found to be malicious after investigation, the individual may be subject to disciplinary action in accordance with university procedures. The University acknowledges, however, that unfounded or unproven reports are not the same as malicious ones and will never penalise individuals for coming forward in good faith.

## **Precautionary Measures**

Steps taken by the University to protect students or staff while a case is being considered or investigated. These may include timetable adjustments, restrictions on contact between individuals involved, temporary relocation of work or study spaces, or suspension from specific duties. While not disciplinary in nature, such measures may feel restrictive and are assessed case by case.

## **Report**

A formal notification to the University requesting action in response to sexual violence or misconduct. A report may lead to an investigation under the Student Conduct Regulations, Staff Disciplinary Procedures, or other institutional processes. A report may also be made to the police or other external authority.

## **Reporting Party**

The individual or individuals, that have formally reported a case of misconduct.

## **Responding Party**

The term 'Responding Party' refers to the individual or individuals against whom the report has been made.

## **Safeguarding**

The legal and procedural responsibility to protect individuals — particularly children, young people, and vulnerable adults — from harm, abuse, or exploitation. The University has a duty to act where safeguarding risks are identified.

## **Staff with Responsibility for Sexual Misconduct Support**

University staff members who are trained to respond to disclosures or reports of sexual violence or misconduct. These individuals provide confidential guidance, coordinate support, and help individuals understand their reporting options.

**Third Party**

An individual or organisation who is not a student or staff member of the University, but who may be involved in or affected by a reported incident. This includes visitors, contractors, external partners, and members of the public. In the context of sexual misconduct or harassment, it may also refer to someone who witnesses an incident, is indirectly impacted, or is alleged to have engaged in misconduct involving a member of the University community.

**Unsubstantiated Reports**

Reports where there is insufficient evidence to proceed or reach a finding under relevant procedures. An unsubstantiated outcome does not imply that the report was false or malicious. Reports may be unsubstantiated for a variety of reasons, including where a person chooses not to proceed, withdraws from the process, or where evidence is not available. The University is committed to treating all parties fairly and without presumption.

**Vexatious Reporting**

A report made without genuine intent, designed to cause disruption, distress, or reputational harm. These reports are rare and will be assessed with care and fairness. They may be addressed through disciplinary procedures if deemed to undermine the integrity of university processes.

## **Annex C: Regulatory Mapping (Conditions E6) Sexual Violence and Sexual Misconduct Policy – Assurance Against OfS Condition E6**

### **Compliance Mapping Statement**

Under **Condition E6** of registration with the Office for Students (OfS), universities are required to take all reasonable steps to prevent and respond to incidents of harassment and sexual misconduct. This appendix provides an assurance mapping of how London Metropolitan University's updated Sexual Violence and Sexual Misconduct Policy and Procedures align with each aspect of the Condition.

It outlines how the University has embedded the regulatory requirements within its institutional approach to prevention, support, investigation, communication, training, and governance oversight.

This mapping forms part of the University's wider response to regulatory compliance and student safety, and will be reviewed annually to ensure alignment with OfS guidance and sector expectations.

| Condition E6 Requirement                                                                       | Policy/Procedure Mapping                                                                                                                                         |
|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>E6.1</b> Prevent harassment and sexual misconduct.                                          | Policy sections 2.1–2.7, 5.1–5.7: Sets expectations, defines misconduct, and outlines a prevention-first culture.                                                |
| <b>E6.2</b> Enable reporting, including anonymous reporting.                                   | Procedure sections 5.1–5.2; Policy sections 8.1–8.3: Report and Support platform enables anonymous or named disclosures; access to SVSM Officers.                |
| <b>E6.3</b> Ensure fair, clear, accessible procedures.                                         | Procedure sections 6.1–6.10; Policy sections 8.4–8.11: Details full reporting and case-handling processes, including exploratory meetings and investigations.    |
| <b>E6.4</b> Take appropriate disciplinary action when allegations are upheld                   | Procedure section 7.1; Policy sections 8.4, 8.8: Aligns with Student Conduct Regulations and Staff Disciplinary Procedures.                                      |
| <b>E6.5</b> Provide appropriate support to those involved.                                     | Procedure sections 5.4, 6.2, 6.5; Policy sections 2.4, 5.1(g), 8.3–8.5: Specialist support via SVSM Officers; referral to counselling and safeguarding services. |
| <b>E6.6</b> Clearly communicate expectations and procedures.                                   | Policy sections 2.5, 2.6, 5.1(c), 7.6–7.7: Annual training, internal communications, and publication via the Single Comprehensive Source of Information (SCSI).  |
| <b>E6.7</b> Ensure sufficient resources and capacity to manage disclosures and investigations. | Policy sections 2.4, 5.1(g), 7.2, 7.4; Procedure sections 6.7–6.9: Resourced SVSMO team; cross-                                                                  |

|                                                                          |                                                                                                                                                          |
|--------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                          | departmental exploratory meetings; commitment to training and capacity monitoring.                                                                       |
| <b>E6.8</b> Maintain a single, easily accessible source of information.  | Policy section 5.1(i): Policy and procedural documents are published on the Single Comprehensive Source of Information (SCSI).                           |
| <b>E6.9</b> Keep records and use them to identify and act on patterns.   | Procedure sections 8.2–8.4; Policy sections 8.6, 8.9: Data held in Report & Support; annual case review and trend analysis by protected characteristics. |
| <b>E6.10</b> Ensure appropriately trained staff investigate allegations. | Policy section 8.6; Procedure section 6.9: Trained SVSMOs and external investigators where needed; commitment to trauma-informed approaches.             |

### Compliance Note

This regulatory mapping has been prepared to demonstrate how the University's revised Sexual Violence and Sexual Misconduct Policy and Procedures align with the requirements of the Office for Students' Condition E6. It is intended to support institutional understanding of regulatory expectations and provide a clear framework for internal assurance.

Once the revised policy is approved, this mapping can be reviewed and updated regularly to support monitoring, reporting, and the maintenance of the Single Comprehensive Source of Information (SCSI).

