

Regent College London

Anti-Harassment and Anti-Bullying Policy and Procedure

Purpose

1. The overall purpose of this policy is to establish an environment for students in which harassment and bullying (including sexual harassment and misconduct) are known to be unacceptable and where students have the confidence to complain about bullying and harassment knowing they will be supported by the College and not be victimised for making a complaint.

Who does this procedure apply to?

2. This policy and procedure applies to all students and covers all dealings among them, whether those dealings be public, private, face-to-face or digital, and regardless of when and where these dealings take place. It also applies to complaints about bullying or harassment by students about staff or third parties.

What are harassment, bullying and victimisation?

Harassment

3. Harassment is where unwanted conduct related to a personal attribute of a person occurs with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. There are examples of behaviour which may constitute harassment in Annex A.

Bullying

4. Bullying is the abuse of power or position to undermine a person so that their confidence and self-esteem or self-worth is weakened. It may arise from the personal style of the bully, and attacks may be irrational, unpredictable and unfair. There are examples of behaviour which may constitute bullying in Annex A.

Victimisation

5. Victimisation is the subjection of a person to a detriment because he or she has made (or intends to make, or is believed to be intending to make), in good faith, an allegation of harassment or bullying, or has supported someone else in making an allegation.

6. Harassment, bullying and victimisation may occur in public or in private, face-to-face or through other means of communication including emails, text messages, or social media posts.

7. Harassment, bullying and victimisation often arise from the abuse of a power relationship and both individuals and groups may be harassed, bullied or victimised. The perpetrator does not have to intend to harass, bully or victimise. The perception of the recipient is very important, but the test of reasonableness must also be applied, that is, a reasonable neutral person would regard what is happening as harassment, bullying or victimisation. Normally, to constitute harassment, bullying or victimisation, the behaviour must continue after an objection is made, but a single incident may be serious enough to constitute harassment, bullying or victimisation too.

8. In its most extreme forms, harassment, bullying and victimisation may take the form of a criminal offence. In such an event, the College will support the victim or victims to make a complaint to the Police.

Principles

9. The College has a zero-tolerance approach to all forms of harassment, bullying and victimisation by its staff or students. Therefore, all allegations of bullying, harassment or victimisation will be regarded as a serious matter and dealt with according to this policy and procedure.

10. Any information received will be handled with an appropriate level of confidentiality. Where personal information is shared or released it will only be done for the purposes of ensuring compliance with this policy and associated procedures.

Support for students

11. The College is committed to supporting students who make complaints about harassment, bullying or victimisation throughout the investigation of their complaint.

12. Students who are victims of bullying, harassment or victimisation should speak to their Customer Services Officer. The Customer Services Officer may refer the student to specialist support services within and/or outside the College.

How the procedure works

Complaints from students about staff

13. A student wishing to make a complaint about harassment, bullying or victimisation by a member of staff (regardless of who the alleged victim is) should speak to their Academic Support Officer or Customer Services Officer, who will then be responsible for raising the matter with the relevant line manager or with Human Resources according to the procedure described in 'Complaints from staff about staff' below. Where the complaint cannot be resolved informally to the complainant's satisfaction using this procedure, the complainant may make a formal complaint under the Student Complaints Procedure. However, where the complaint involves an allegation of gross misconduct (such as sexual harassment), the College may invoke its staff bullying and harassment and/or staff disciplinary procedures immediately, in accordance with the Employee Handbook.

Complaints from students about other students

14. A student wishing to make a complaint about harassment, bullying or victimisation by another student (regardless of who the alleged victim is) should speak to their tutor, Academic Support Officer, or Customer Services Officer, who should raise the matter with the relevant Head of Programme or Programme Leader. The Head of Programme or Programme Leader will then be responsible for referring the complaint to the Student Disciplinary Procedure.

Complaints from staff about other staff

15. The procedure for staff to make to a complaint about harassment, bullying or victimisation by other staff is described in the College’s Employee Handbook.

Complaints from staff about students

16. A member off staff wishing to make a complaint about harassment, bullying or victimisation by a student (regardless of who the alleged victim is) should speak to their line manager, who should then raise the matter with the relevant Head of Programme or Programme Leader (or contact the Head of Programme or Programme Leader directly). The Head of Programme or Programme Leader will then be responsible for referring the complaint to the Student Disciplinary Procedure.

Allegations involving third parties

17. For the purposes of this document, a third party is someone whom a student interacts with during their studies or work who is not a student or staff member employed by the College. Examples of a third party include a contractor working on the College campus or a member of staff at a work placement provider.

18. Students wishing to make a complaint about harassment, bullying or victimisation by a third party should speak to their Academic Support Officer or Customer Services Officer, who should raise the matter with the relevant Head of Programme or Programme Leader (or contact the Head of Programme or Programme Leader directly). The Head of Programme or Programme Leader will then be responsible for dealing with the complaint.

<i>Version number</i>	<i>1.6</i>
<i>Publication date</i>	<i>March 2024</i>
<i>Approved by</i>	<i>Chair of Academic Council</i>
<i>Approval date</i>	<i>19 March 2024</i>
<i>Next review date</i>	<i>July 2024</i>
<i>Policy owner</i>	<i>Director of Academic Governance</i>

Annex A: Examples of harassment and bullying

Harassment based on personal attributes may include:

- Sexual Harassment, for example unwelcome sexual advances, sexually provocative looks, remarks or jokes, comments on appearance, displaying offensive images in posters or screensavers, inappropriate texting or emailing, touching and other forms of assault. (There are professional and ethical reasons for staff and students to maintain an appropriate professional relationship).
- Racial Harassment, for example derogatory name-calling, insults, reference to skin colour, racist jokes, ridicule for cultural difference, verbal abuse and assault. The College welcomes and values the cultural diversity of its community. Differences in understanding about acceptable behaviours in various cultures may not be harassment, but the people involved in any such difference will be supported in reaching an understanding.
- Disability Harassment, for example not recognising competencies, drawing attention to disability or personal appearance, jokes, ignoring or focussing on a person because of their disability.
- Ageist Harassment, for example denigrating competencies, patronising, ridiculing, marginalising, leaving people out of social activities.
- Sexual Orientation Harassment, for example homophobic jokes or remarks, abuse relating to HIV/AIDS status, threats to disclose sexual orientation, ridiculing civil partnerships.
- Religion or Belief Harassment, for example not supporting religious requirements such as prayer, offering inappropriate catering to minority groups, offensive remarks and jokes, ridiculing religious requirements in dress.
- Gender Reassignment Harassment, for example ridiculing dress and personal appearance, offensive jokes and remarks.
- Status Harassment, for example patronising, ostracising or marginalising colleagues with different job roles or students with different backgrounds. Showing favouritism may also be regarded as status harassment.

The above list of examples is not exclusive or exhaustive. Harassment can occur on the basis of any personal attribute that makes the individual different from others, or from the person who harasses them.

Bullying is the exercise of power over another person through negative acts or behaviour that undermines them either personally, academically and/or professionally. Bullying can involve threatening, insulting, abusive, disparaging or intimidating behaviour which places inappropriate pressure on the recipient or has the effect of isolating or excluding them. Bullying can take the form of shouting, sarcasm, derogatory remarks concerning academic performance or constant criticism and undermining. Bullying is to be distinguished from vigorous academic debate or the actions of a teacher or supervisor making reasonable (but perhaps unpopular) requests of their students.