

# STUDENT HARASSMENT AND SEXUAL MISCONDUCT

## ASU LONDON POLICY 2025/26

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Approved by	Executive
Approval date	1 August 2025
Review date	1 August 2026

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## 1. INTRODUCTION

ASU London is committed to providing an inclusive, safe, and respectful environment where all students can study, work free from harassment and sexual misconduct. We operate a zero-tolerance approach to harassment and sexual misconduct, and believe that no individual should ever have to accept, tolerate, or feel responsible for such behaviour.

## 2. SCOPE

This policy applies to students studying a higher education course at ASU London. It covers incidents and alleged incidents of harassment and sexual misconduct that occur on campus or online during any ASU London student activities or in any context where a student is representing ASU London. The policy also applies to conduct by staff towards students, and between students.

Students who are not studying a higher education course at ASU London have access to the same harassment and sexual misconduct support as others and in addition the Safeguarding Policy applies to ensure their safety and wellbeing.

## 3. PURPOSE

The purpose of this policy is to:

- Outline ASU London's commitment to responding promptly to incidents and alleged incidents of harassment and sexual misconduct.
- Raise awareness and promote a culture of respect, inclusion, and safety.
- Provide clear definitions, reporting procedures, and support pathways.
- Ensure all parties are treated with dignity and respect and have access to support.
- Ensure compliance with OfS requirements and relevant UK legislation.

## 4. TRAINING AND CULTURE

ASU London is committed to providing appropriate and fair support to all students who are the subject of a sexual misconduct allegation, in accordance with safeguarding procedures and disciplinary frameworks. ASU London will:

- Provide mandatory training for all students and all staff on consent, respectful behaviour, and reporting procedures.
- Promote healthy relationships and empower bystanders to challenge problematic behaviour.
- Ensure staff and students with key responsibilities receive enhanced training in trauma-informed responses and legal compliance.
- Publish this policy on the website and student portal and include it in induction activities.

#### 4.1 Promoting Positive Relationships

ASU London is committed to fostering a community built on mutual respect, inclusion, and consent. This includes:

- Campaigns and workshops throughout the academic year on healthy relationships, consent, and bystander intervention.
- Collaboration with student representatives to co-design awareness initiatives that reflect the lived experiences of the student body.
- Integration of positive relationship values into all teaching, events, and co-curricular activities.

#### 4.2 Creating a Safe Culture

ASU London will actively promote a culture in which all students and staff feel safe to speak out without fear of judgement or retaliation. This will be achieved by:

- Encouraging open dialogue and consultation with students on safeguarding issues.
- Training staff and student leaders in trauma-informed and supportive communication.
- Reinforcing zero-tolerance messaging across ASU London's communications and events.

#### 4.3 Informing Students

ASU London will ensure all students are aware of their responsibilities, rights, and available support by:

- Introducing this policy and related reporting mechanisms during Welcome Week and induction activities.
- Providing refresher information annually via the student hub portal, at in events, and staff-student forums.
- Maintaining clear signposting throughout the campus and online platforms.

#### 4.4 Training Delivery and Records

- All students will complete training on harassment, sexual misconduct, and consent via mandatory e-learning modules, supplemented by in-person workshops where appropriate.
- All staff will receive induction training, followed by regular refresher sessions. Staff in key safeguarding or disciplinary roles will complete enhanced training in trauma-informed responses and legal compliance.
- ASU London will keep a log of staff and student training delivered which will be made available to staff and students, demonstrating transparency and accountability.

## 5. KEY DEFINITIONS

### 5.1 Harassment

At ASU London, harassment is defined as any unwanted behaviour which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. This is based on the legal definitions drawn from the Protection from Harassment Act 1997 and the Equality Act 2010.

Harassment may be related to (but is not limited to):

- Protected characteristics under the Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation).
- Other personal attributes such as appearance, social background, academic standing, or any aspect of identity.

Harassment can take many forms, including:

- Verbal – offensive jokes, comments, or slurs.
- Non-verbal – gestures, exclusion, or threatening behaviour.
- Written/digital – emails, texts, social media posts, or images.
- Physical – unwanted contact or intimidating physical presence.

At ASU London, it is recognised that:

- Perception matters – what is important is the impact on the person experiencing the behaviour.
- Intention is not required – behaviour may still constitute harassment even if it was not deliberately meant to cause offence.

### 5.2 Sexual Misconduct

At ASU London, sexual misconduct is defined as inappropriate and unwanted behaviours of a sexual nature. These behaviours may be physical, verbal, psychological, or online.

It covers a broad range of behaviours, including but not limited to:

- Sexual harassment (unwanted conduct of a sexual nature, including comments, jokes, gestures, or physical contact)
- Sexual assault and rape
- Sharing or threatening to share intimate images without consent
- Coercion, stalking, and other forms of sexual violence
- Any behaviour that creates an intimidating, hostile, degrading, humiliating, or offensive environment

Further information can be found in Appendix 1.

### 5.3 Consent

Consent is the agreement to participate in a sexual act, given freely and with capacity to understand the decision. Consent cannot be presumed and must be explicitly given. It cannot be given under pressure, coercion, or when incapacitated (e.g., due to alcohol, drugs, or unconsciousness). Consent can be withdrawn at any time.

## 6. STAFF–STUDENT RELATIONSHIPS

ASU London recognises the inherent power imbalance in staff–student relationships. To protect students from potential conflicts of interest, abuse of power, or perceptions of favouritism, the following applies:

- ASU London does not permit intimate relationships between its staff and students. Staff must therefore not initiate or pursue intimate personal relationships with students.
- where an existing relationship arises, it must be declared to HR immediately so that appropriate measures can be put in place to mitigate risks. Failure to disclose will result in disciplinary action against the member of staff.

## 7. POLICY TRANSPARENCY AND HISTORICAL VERSIONS

To ensure transparency and accountability, ASU London will maintain an archive of all historical versions of this policy. Students and staff will be able to access prior versions by contacting Student Hub or the Registry.

### 7.1 Governance and Monitoring ASU London will:

- Maintain confidential records of incidents and alleged incidents
- Seek feedback from students and staff to ensure the policy remains current and effective
- Review this policy annually or as required.

Oversight of this policy is held by the Safeguarding Lead, reporting to the Executive Team.

## 8. MAKING A DISCLOSURE OF SEXUAL MISCONDUCT AND ACCESSING SUPPORT

8.1 ASU London encourages any student who has experienced sexual misconduct, either first hand or indirectly, to disclose the incident by emailing Safeguarding ([safeguarding@asu-london.ac.uk](mailto:safeguarding@asu-london.ac.uk)). Disclosures can be made anonymously by a written letter or with contact details, and students have the option to speak directly with a Student Support Officer rather than by email.

8.2 Disclosures may also be made to any ASU London staff member (academic or professional services). Staff who receive a disclosure are required to refer it to the Student Support Team via ASU London’s [safeguarding@asu-london.ac.uk](mailto:safeguarding@asu-london.ac.uk).

- 8.3 Once a disclosure is made, a Safeguarding-trained member of staff will be assigned to support the student and the alleged offender. They will explain the student's options, which may include:
- Requesting an internal investigation under ASU London's Disciplinary Procedure.
  - Reporting the incident to the police - where a student reports an incident to the Police, the Student Support Team can offer support.
- 8.4 ASU London is committed to upholding the highest ethical standards and ensuring that all reports of sexual misconduct are dealt with fairly, sensitively, and in a timely manner, in line with our safeguarding responsibilities and legal obligations. When handling disclosures or allegations of sexual misconduct, ASU London will:
- Prioritise student wellbeing, seeking to resolve concerns informally through support and guidance where appropriate, while ensuring that formal Processes are always available.
  - Manage allegations, investigations, and outcomes fairly, transparently, and with appropriate seriousness, ensuring all parties are treated with dignity and respect.
  - Act within clear and reasonable timescales:
    - Initial acknowledgment of a disclosure: within 2 working days
    - First wellbeing/support contact offered: within 5 working days
    - Initial review and next steps communicated: within 15 working days
    - Formal investigation process (where pursued): normally completed within 60 calendar days from the start of investigation, with regular updates provided if this cannot be met.
  - Keep students informed of progress and expected timelines throughout the process.
  - Ensure learning from each case, using outcomes and feedback, is applied to improve its support, culture, and safeguarding practices.
  - Operate in accordance with its policies, safeguarding procedures, and Relevant UK law, including the Equality Act 2010, Protection from Harassment Act 1997, and Sexual Offences Act 2003, as amended from time to time.
- 8.5 Support is available regardless of whether a reported alleged incident involves another ASU London or student or member of staff, and even if it occurred outside the ASU London environment. Assigned staff will assist students in accessing relevant services, which may include:
- Mental health and counselling services
  - Sexual violence support charities or specialist services
  - Academic support or adjustments.
- 8.6 ASU London is committed to a student-led approach. No student will be pressured to pursue a specific course of action. Students have the right to choose how much information they share and whether they wish to make a formal report. The assigned staff will ensure the student understands their rights and is empowered to decide how they wish to proceed.

- 8.7 In some cases, ASU London may be legally or ethically required to take action without the complainant's explicit consent, for example, where there is a perceived risk of serious harm to the individual or others. In these situations, ASU London will aim to inform and support the complainant unless it is not reasonable, practicable, or safe to do so.
- 8.8 Students affected by sexual misconduct can access support from:
- ASU London Student Support Team
  - National helplines (e.g., Rape Crisis, The Survivors Trust, National Domestic Abuse Helpline)
  - other external agencies as appropriate, for example as listed in Appendix 2

## **9. CONFIDENTIALITY AND DATA PROTECTION**

ASU London will take all reasonable steps to protect the confidentiality and privacy of those making disclosures, except where there is a risk of significant harm or as required by law.

## **10. RELATED ASU LONDON POLICIES AND EXTERNAL LEGISLATION**

This policy should be read in conjunction with:

- Student Discipline Policy
- Equality, Diversity, and Inclusion Policy
- Safeguarding Policy

Relevant legislation including:

- Equality Act 2010
- Protection from Harassment Act 1997
- Sexual Offences Act 2003

This policy will be reviewed at least annually.

## APPENDICES

### Appendix 1: Further examples on types of sexual misconduct

The list below provides examples of types of sexual violence, sexual harassment, and related abuse. It is not exhaustive but offers guidance on recognising and understanding different forms of misconduct.

#### 1.1 Child Sexual Abuse

Sexual exploitation or involvement of a child in sexual activity, including grooming, indecent exposure, production of child pornography, or coercion into sexual acts. This includes actions by adults or other young people.

#### 1.2 Coercion

Using threats, psychological manipulation, intimidation, or physical force to compel someone to engage in an act against their will, including sexual acts.

#### 1.3 Doxxing

Sharing or publishing private or identifying information about someone without their consent, often with the intent to harass, threaten, or cause harm.

#### 1.4 Female Genital Mutilation (FGM)

The deliberate cutting, removal, or injury of female genitalia for non-medical reasons. It is a form of child abuse and is illegal in the UK.

#### 1.5 Forced Marriage

A marriage where one or both individuals are coerced into the union without full, free, and informed consent. Recognised as a form of domestic abuse and a violation of human rights.

#### 1.6 Gaslighting

A form of psychological abuse in which a person manipulates another into questioning their own memory, perception, or sanity, often over a sustained period.

#### 1.7 Honour-Based Violence

Acts of violence or abuse committed to protect or defend the honour of a family or community, often targeting those perceived to have brought "shame" through their behaviour or choices.

#### 1.8 Indecent Exposure

Deliberate public exposure of intimate body parts in a way that is likely to cause alarm or distress, or that violates local moral standards.

#### 1.9 Rape

Non-consensual penetration of the vagina, anus, or mouth with a body part or object. Consent must be freely given and can be withdrawn at any time. Rape can be committed through force, coercion, or against someone unable to consent.

#### 1.10 Revenge Porn

The sharing or distribution of sexually explicit images or videos without consent. Often used to humiliate, control, or coerce individuals, particularly following the breakdown of a relationship.

### **1.11 Ritual Abuse**

Systematic physical, sexual, or psychological abuse that takes place within a religious, cult, or ritual context. Often long-term and may involve group participation.

### **1.12 Sexual Assault**

Any unwanted sexual touching or physical sexual contact without consent. Includes a broad range of acts such as groping, forced kissing, or attempted rape.

### **1.13 Sexual Exploitation**

Taking advantage of someone's sexual vulnerability or appearance for personal gain, including through abuse of power or trust. This may involve transactional relationships, coercion, or manipulation.

### **1.14 Stealthing**

Non-consensual removal or tampering with a condom during sex, when the other person has only consented to protected sex. This constitutes a breach of consent and may be considered sexual assault.

### **1.15 Trafficking**

The recruitment, transportation, or harbouring of individuals through coercion, deception, or force for the purpose of exploitation, including sexual slavery or forced marriage.

### **1.16 Upskirting**

The act of taking photographs or videos under a person's clothing without their consent, with the intention of capturing images of their underwear, genitals, or buttocks. This is a criminal offence in the UK.

ASU London is committed to maintaining a safe, respectful, and inclusive learning and working environment. Any behaviour, or allegations of behaviour, falling under the categories listed above will be taken seriously and addressed in line with this policy.

## **Appendix 2: National helplines and support contacts**

- [Help after rape and sexual assault - NHS](#)  
[Get help after rape or sexual assault | Rape Crisis England & Wales](#)
- [Home - Women's Aid](#)
- [The Survivors Trust - Rape & Sexual Abuse Services UK](#)
- [homepage - MSP - The Male Survivors Partnership](#)
- [Homepage - National Domestic Abuse Helpline](#)
- [Contact Us | Samaritans](#)
- [Hate crime - Victim Support](#)
- [Report all Hate Crime - Stop Hate UK](#)
- [Transgender hate crime - True Vision](#)
- [What is Disability Hate Crime? - Ann Craft Trust](#)
- [Young People | AAS Website](#)