

POLICY FOR PREVENTING AND ADDRESSING HARASSMENT AND SEXUAL MISCONDUCT



Title:	Policy for Preventing and Addressing Harassment and Sexual Misconduct.
Policy Owner:	Head of Education (with coordination from the Head of Operations)
Policy Approval and Review:	This policy was agreed by the Board of Governors in June 2026 and will be reviewed at the end of each academic year or more often as required.
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Introduction

Belfast School of Theology (BST) is committed to ensuring a safe and secure environment for all those who work and study on our premises located on the Stranmillis University College campus (SUC). BST recognizes that it has a legal duty to ensure, so far as is reasonably practicable, the health, safety and welfare of everyone accessing its services and facilities and a wider public protection duty.

BST is committed to a proactive approach towards achieving these outcomes through sound procedures and good practice as outlined later in the policy.

Purpose of this Policy

The aim of this policy is to promote a culture where harassment and sexual misconduct of any student or staff member is unacceptable. This policy sets out the expectations of behaviour of our staff (including other associated personnel e.g. Associate Lecturers, hereby referred to as 'staff') and students and provides approaches for dealing with allegations of harassment and sexual misconduct. It aims to protect students, employees and all connected with BST from sexual harassment and inappropriate behaviour.

Scope

This policy applies to any student enrolled on a course of study with BST whether or not the enrolment leads to a final award and regardless the level or mode of study. This policy applies to all employees and volunteers of BST as well as anyone who carries out work on behalf of BST. This policy is designed to cover instances or alleged instances of harassment or sexual misconduct. Consensual relationships between students and staff are covered in the Employee Handbook / Student Code of Conduct and will be shared with other associated personnel as required.

Allegations, complaints or incidents of harassment or sexual misconduct that are within a student placement setting should be directed to the relevant organisation.

Definitions

Consent

Consent is agreed by choice and having the freedom and capacity to make that choice. The person seeking consent should always take steps to ensure that consent is freely given, that it is informed and recognize that it could be withdrawn at any time.

Capacity to consent

Capacity is about whether someone is physically and/or mentally able to make a choice and to understand the consequences of that choice. For example, a person does not have the capacity to give consent if: they are drunk or under the influence of drugs or if they are asleep or unconscious. A person *may* not have capacity to give consent if they have a disability or are experiencing a mental health crisis.

Freedom to consent

A person is free to make a choice if nothing negative would happen to them if they said no. A

person may not feel free to make a choice if they are being threatened or blackmailed.

Harassment

(as defined by the Equality Act, 2010)

Harassment is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Rape

Rape is when someone puts their penis in another person's vagina, anus or mouth, without the person's permission.

Sexual Misconduct

Sexual misconduct is a form of harassment and is unacceptable behaviour of a sexual nature. It can include but is not limited to: sexual harassment, sexual violence, grooming, sexual comments, sexual non-verbal communication and promised resources or advancements in exchange for sexual favours.

Sexual violence

An umbrella term referring to the different sexual offences of rape, sexual assault by penetration and sexual assault. These are part of the criminal law and are found in the Sexual Offences Act 2003.

Sexual Assault

Sexual assault is where one person intentionally touches another person sexually without their consent. The touching can be done with any part of the body or with an object.

Stalking

Following a person, watching or spying on them, including via social media. This may make a victim feel frightened.

Policy

All students, staff and volunteers and BST deserve the opportunity to study, learn and work in an environment which is free from all forms of harassment or sexual misconduct. All members of the BST community should be treated with dignity and respect at all times, and it is expected that all members of the community will share in this responsibility for creating and sustaining an environment in which everyone is respected and safe from harm.

We recognize the significant impact of all experiences of harassment and sexual misconduct, and acknowledge the potential detriment to the wellbeing of a student, staff member or volunteer. We will seek to sustain an equal and safe environment in which a culture of prevention will be promoted through appropriate and consistently applied education and training.

All BST staff will be informed of the policy and procedure and will be trained as appropriate to their roles. Any member of BST is encouraged to formally report cases of harassment or sexual misconduct, whether they are the recipient of the behaviour or are witness to it, as soon as reasonably practicable. BST will take all allegations and reports seriously and will respond to all reports of harassment, and sexual misconduct promptly, and, whilst recognizing that some experiences may constitute a criminal offence, we will ensure that in all cases reports are carefully and thoughtfully addressed by relevant employees through a process that is

transparent and clearly communicated to the individuals involved.

BST will respect the right of the individual disclosing an experience to choose how to take forward a disclosure. Whilst 3rd party or bystander reports may be submitted, and will be considered, these will only be taken forward as a formal report with the consent of the individual involved. Where a crime has allegedly been committed the reporting party is encouraged to report the incident to the police. Where the police are involved internal procedures may be put on hold, although the responding party may be suspended from all or part of BST until the outcome of external investigations and/or criminal proceedings is known. BST reserves the right to refer matters to the police where a criminal act may have occurred. Any investigation that BST undertakes will be to determine whether the reported behaviours have breached the respective student or employee Codes of Conduct and Disciplinary Procedures.

Confidentiality will be maintained, where possible, throughout the disclosure, reporting and investigative procedure in recognition of the sensitive nature of sexual misconduct matters. As such, information will usually only be shared with relevant individuals/entities with the agreement of the reporting party.

BST may be under an obligation, to share information in exceptional circumstances where such disclosure is necessary to protect any individual or the wider school community from harm or to prevent a crime from taking place.

Throughout all proceedings, BST will act in compliance with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

Roles and Responsibilities

Role	Responsibility
Board	Ensure satisfactory mechanisms are in place so that harassment and sexual misconduct is taken seriously at BST. Undertake relevant training as board members.
Principal and Senior Leadership Team	Ensure harassment and sexual misconduct is afforded the utmost priority at the most senior level through their links to the Board and management team. Ensure procedures are in place for managing harassment and sexual misconduct allegations. Implement code of conduct or student code of conduct in relation to any disciplinary procedure.
Safeguarding Lead	Oversee associated procedures, practice and guidance to promote wellbeing and prevent harassment and sexual misconduct from happening. Engage staff and volunteers with the policy and procedures across BST to act on harassment and sexual misconduct complaints.

	Ensure that time and resources are allocated for training in harassment and sexual misconduct for all staff and volunteers. To compile and analyze records of reported concerns to determine whether a number of low-level concerns are accumulating to become more significant; and make records available for inspection.
Students	To be aware of, and comply with, the policy and other relevant BST policies such as the Safeguarding Policy and the Student Code of Conduct and Disciplinary Policy. To raise concerns about their own support needs as soon as possible. To ensure they are conducting themselves in line with the Student Code of Conduct and to engage fully with the Disciplinary process as required.
All staff and volunteers	To be aware of, and comply with, the policy, associated procedures and other relevant BST policies such as the Safeguarding Policy. To raise concerns about their own support needs as soon as possible. To ensure they are conducting themselves professionally and appropriately. To raise concerns about problematic or potentially problematic relationships with their line manager, involving any combination of either themselves, colleagues or students. To remain within the boundaries of their role and involve specialist student or employee support mechanisms as appropriate.

Data Protection

- Written records of any allegations or incidents of harassment or sexual misconduct will be retained for as long as is necessary for the purpose for which it was obtained or as legally required or lawfully permitted.
- Such written records will be held centrally and separately from a member of staff, volunteer or student's personal records.
- All such records should be stored in a locked filing cabinet or password protected if stored electronically.
- All such records are kept in accordance with the Data Protection Act 1998. See BST's Data Protection Policy for details.
- In line with the terms of the Data Protection Act 1998, anyone for whom BST holds records is entitled to a copy of all their personal data held by BST. An exception would be if the release of

the information would interfere with the prevention, detection or investigation of a crime. All requests should be made through the office.

Policy Approval and Review

The Safeguarding Lead will annually review this policy or more often as required.

The overall responsibility for achieving the objectives of this policy and ensuring its compliance rests with the Board, who are also responsible for its final annual review and monitoring.

The Principal also has responsibility for overseeing any complaints brought under the terms of the policy and ensuring that decision-making complies with all relevant regulatory bodies.

Policy Communication

All BST staff and volunteers will be informed of the preventing and addressing harassment and sexual misconduct policy and will receive training appropriate to their role. All BST students will be informed of the preventing and addressing harassment and sexual misconduct policy and an explanation will be provided to them at their Induction. All policies including the preventing and addressing harassment and sexual misconduct policy, will be available to all students on the student portal of the BST website.

Appendices

Procedures for students

Reporting Channels

Students who wish to disclose an allegation or incident relating to harassment or sexual misconduct should report to the safeguarding lead, a senior manager or student affairs as appropriate. For formal action to be taken the reporting person would need to confirm they wished their disclosure to be used as a formal report, unless the notification is of a type that is governed by our statutory safeguarding duty. In this case, the notifying student will be informed about the action to be taken.

Investigation process

Where a student wishes to make a formal report through the internal school processes, raising concerns against another student, this will be investigated and dealt with via the Student Code of Conduct and Disciplinary Procedures.

Where a student wishes to make a formal report through BST's internal processes, raising concerns against a member of staff, this will be investigated through the Positive Work Environment Policy.

Support and Advice for Students

Pastoral support will be made available to a victim of alleged sexual misconduct or harassment.

A student alleged to have engaged in harassment or sexual misconduct, whether under investigation by the Police or by BST will normally be subject to precautionary actions. Where possible, they will be supported to continue to engage with their programme of study. Students responding to such allegations will also be offered pastoral support. Students who have a disability of any kind will be offered reasonable adjustments if that is necessary to assist them during the process. Any students requiring reasonable adjustments should declare that to the staff member at the earliest opportunity.

Procedures for staff and volunteers

Reporting Channels for staff and volunteers

Where appropriate staff and volunteers should raise a complaint to the safeguarding lead or another senior manager. They will then determine whether to make arrangements for an investigation to be undertaken in accordance with the BST's Positive Work Environment Policy. BST will aim to deal with all complaints in a fair, balanced and proportionate way.

If the disclosure is against a student, then the allegation will be progressed through the Student Code of Conduct and Disciplinary Procedures.

Any staff member or volunteer suspecting harassment or sexual misconduct between a colleague and a student or another stakeholder is encouraged to report or disclose this to the safeguarding lead or another senior manager.

Investigations into Complaints or Allegations

Any investigations into allegations of harassment or sexual misconduct by employees will be conducted under BST's Positive Work Environment Policy. Investigations into allegations of harassment or sexual misconduct by students will be conducted under the Student Code of Conduct and Disciplinary Procedures.

Sexual harassment may also lead to a criminal investigation being instigated into the actions of an employee or student.

Confidentiality will be maintained as much as possible, subject to any requirement to involve witnesses, or external agencies where a criminal offence may have been committed or where maintaining confidentiality would pose a risk to the person making the report, or to others.

Support and Advice for staff and volunteers

There is support available to employees and volunteers prior to making a complaint or to both complainant and alleged perpetrator once a complaint has been made. These include line managers as first point of contact and pastoral care worker, also referral can be made to a confidential counselling service.