



N.B. Policies for Faculty and Staff are in the Employee Handbook

Student Policy on Harassment

Scope and purpose

Nazarene Theological College (NTC) is a Christian college aspiring to be a learning community reflecting the love of God as Father, Son and Holy Spirit. The College intentionally fosters character formation within contexts that are both practical and reflective.

This policy relates to all students of NTC: NTC has a firm commitment to equality and diversity and will not tolerate harassment or bullying within its community. The purpose of this policy is to promote the development of a working environment in which harassment and bullying are known to be unacceptable and where individuals have the confidence to complain about harassment and bullying should they arise, in the knowledge that their concerns will be dealt with appropriately and fairly. The policy outlines procedures to be followed if a student feels they are being harassed or bullied during their period of study at NTC.

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1. NTC's commitment

1.1 NTC, as part of its commitment to equality and diversity, believes that every student has a right to work and study in an environment which encourages harmonious relationships. NTC is committed to equal opportunities and preventing harassment and bullying.

1.2 Every student is also personally liable under the Equality Act 2010, the Protection from Harassment Act 1997, the Sexual Offences Act 2003, and the Criminal Justice and Courts Act 2015. Allegations of harassment and bullying will be treated very seriously by NTC and could result in disciplinary action being taken against the perpetrator.

1.3 NTC will ensure that any student raising a genuine concern under this policy is not victimised as a result.

2. Definitions

At NTC, harassment has the meaning given in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997 (in its entirety, and as interpreted by section 7 of the Act). (PHA).

As defined by Section 26 and Section 26(2) of the Equality Act 2010, the Sexual Offences Act 2003, the Criminal Justice and Courts Act 2015 and as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017:

Harassment is where a person engages in unwanted behaviour or conduct related to a relevant protected characteristic (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation) and the conduct has the purpose or effect of violating the other person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for the other person.

As defined by the PHA, harassment applies where a person pursues a course of conduct which amounts to harassment of another, and which the perpetrator knows, or ought to know, amounts to harassment of the other. This can include, but is not limited to, alarming the person or causing them distress.

There is a rebuttable presumption that it is unlikely to amount to harassment when students are exposed to course materials, and statements made and views expressed by a person as part of teaching, research or discussions about any subject matter that is connected with the content of a higher education course.

3. Harassment - general principles

3.1 The overriding principles in dealing with allegations or concerns of harassment are that they must be taken seriously, considered carefully and addressed speedily and, where possible, in confidence.

3.2 Any student who feels that they are the subject of harassment, either by a fellow student, a member of staff, faculty or anyone else with whom they come into contact in the course of their period of study at NTC, may wish to make a note of incidents, dates, times and any witnesses, for future reference. Any student who considers themselves to have been the subject of harassment has the right to be listened to and to be given informed advice on how the matter may be resolved. There are usually a number of options. Anyone who feels they have been harassed is likely to wish to speak to someone with whom they feel they share something in common. For this reason they should be able to approach one of a number of different people within NTC (see section 5.2 below).

3.3 Should harassment occur in a group situation, the person in authority within the group has the responsibility to recognise harassment when it occurs and to take speedy action to stop it (such as verbally closing the conversation; request cessation; and, a 1:1 follow up after a situation has emerged to be clear that the harasser understands the impact of their actions/words). It is important that it is made clear to the perpetrator that such behaviour is unacceptable to NTC and will not be tolerated. Silence or inaction can be seen as collusion and endorsement of such behaviour. If the person in authority within the group is the harasser, others within the group should support the individual being harassed in taking action to report the harassment.

3.4 In some circumstances it may be appropriate to remove an employee or student from the situation causing conflict. This may include, but is not limited to, a reassignment of tasks. Where there is a serious allegation, an employee may be

suspended during an investigation (see Section 7.6 below) or a student may be suspended from their studies or excluded from access to all or certain parts of the NTC campus (see Conduct and Discipline of Students Policy).

3.5 Making false or unsubstantiated allegations with malicious intent, could, if proven, lead to disciplinary action being taken, up to and including dismissal or expulsion.

4. How will allegations of harassment be dealt with?

4.1 In the event that a student considers that they are experiencing harassment they have a number of options open to them.

- They may be able to speak or write directly to the individual(s) concerned and request that the behaviour in question stop immediately.
- Alternatively or if they achieve no success through such direct communication, a student may wish to talk to someone in order to obtain another perspective on the situation and to ensure that someone else knows about it and can take action with them or, with their consent and on their behalf, to ensure that it stops. It is hoped that the large majority of cases will be resolved by such informal procedures, which are described in more detail below.
- A final option is to make a formal allegation. Formally a student can complete the Allegation of Harassment form.

4.2 At any point, a student may wish to talk with the Chaplain or one of the Chaplaincy team as they work through this process. This preliminary point of contact is by email to chaplaincy@nazarene.ac.uk or go to the Chaplaincy office in the White House.

5. The informal approach to dealing with harassment

5.1 It is hoped that cases of alleged harassment and/or bullying will be resolved and reconciliation enabled quickly. However, a record of an incident with dates should be kept as soon as possible after the incident by the students concerned and by any confidant.

5.2 Students concerned about harassment may initially wish simply to discuss the matter with a friend or sympathetic colleague. Alternatively or subsequently, students may wish to seek further advice and may approach the following:

- The Warden or Chaplain for out of office hours
- Their personal tutor or faculty member in whom they have confidence

5.3 Any person approached ('advisor' hereafter) by a student who wishes to discuss the matter informally should:

- Find a quiet place to discuss the issue confidentially and without interruption
- Listen carefully to what they are being told and ensure that they understand the full facts
- When they are sure they understand, and if they feel confident to do so, discuss the options open to the complainant

5.4 Confidentiality is very important in dealing with cases of alleged harassment as experience shows that they will be much more difficult to resolve informally if information about the matter becomes common knowledge. Anyone approaching a member of faculty, staff or other individual for advice may, however, wish to be accompanied by a friend.

5.5 If, after having been approached, the advisor wishes to obtain guidance on how to deal with an alleged case of harassment they should seek the agreement of the person who has confided in them to that course of action and then consult with other

sources of advice as appropriate. If the individual does not feel able to help in a particular case, they should explain the reasons to the complainant and refer them to another advisor.

5.6 Once the facts about the incident and the context of the action or behaviour that caused concern are established, there are a number of informal options available to the advisor to facilitate resolution of the matter. The College strongly advises that students seek to work through the issues raised for all concerned. There are options available to resolve this:

a) The person who has experienced harassment could be encouraged to talk to the alleged harasser on his/her own or with a friend, who should be a member of NTC, accompanying him/her. The purpose of the conversation would be to make the perpetrator aware of the way their behaviour has been perceived and ask them not to repeat it.

b) Alternatively, the advisor could facilitate a meeting between both parties to give the complainant the opportunity to talk to the alleged harasser and explain his/her view of the offending behaviour. Normally, the advisor should not take action following an informal approach concerning harassment without the agreement of the individual concerned.

c) With the consent and at the request of the complainant, the advisor could meet with the alleged harasser and ask them to explain his/her view of the offending behaviour. The purpose of the conversation would be to make the perpetrator aware of the way their behaviour has been perceived and ask them not to repeat it.

d) Recognising the emotional strain of experiencing harassment, the emotional and behavioural issues can lead to a wider impact both for all parties concerned and across the community. Skilled mediation may be required at an informal level (without any expectation of sanction for those involved).

5.7 As well as aiming to resolve matters informally, advisors should consider appropriate action to facilitate the restoration of working relationships after the event.

5.8 The action outlined above will be appropriate in many cases and will often be sufficient to resolve the matter.

5.9 Where the involvement of the NTC student mediator does not result in a satisfactory resolution to the matter, a student may wish to enter a formal allegation, by completing the Allegation of Harassment form in Appendix 1 (also available on Moodle, the website and as a QR code). See Sections 6-8 below.

6. A formal allegation regarding harassment

6.1 As indicated above, it is hoped that most cases of alleged harassment and/or bullying will be resolved by the informal procedures outlined above. The College, in keeping with its ethos, is committed to working with both parties to find an acceptable solution.

6.2 Formal action may be considered where informal action proves ineffective, or where a student feels that an informal approach is not appropriate. A formal allegation must be registered in writing by completing the form in Appendix 1 (also available on Moodle, the website and as a QR code), as soon as possible after the incident concerned. It is, however, recognised that allegations of this nature may relate to cumulative actions taking place over a period of time.

6.3 A formal allegation of harassment should include the nature of the allegation, with reference to dates, times and places (where possible) in relation to a specific incident(s). The names of any witness(es) to the incident(s) should also be included.

6.4 If a student's allegation concerns perceived harassment or bullying on the part of another NTC student or students, the formal allegation should be addressed to the Director of Operations (who may take the matter to the Senior Leadership Team). Where the allegation concerns perceived harassment or bullying on the part of an NTC employee, please refer to Section 7 below.

6.5 The Director of Operations will acknowledge receipt of the Allegation of Harassment form within five (5) working days and advise them that support is available from the Chaplaincy team should they feel this would be helpful. The Director of Operations will start the process to appoint an External to lead the allegation. The Director of Operations will inform the complainant once an appointment has been made and will send a copy of the investigation procedure.

6.6 The Director of Operations will inform the alleged perpetrator that an allegation of harassment has been made against them and they will receive a summary of the completed allegation and a copy of the investigation procedure.

6.7 The Senior Leadership Team shall consider whether or not any special arrangements are required to prevent further contact between the complainant and the alleged perpetrator. e.g. actions to prevent any direct or indirect contact between the student and alleged perpetrator(s) in accommodation areas, study spaces, campus facilities and also online via social media. If any actions are implemented it should be made clear to all parties that any actions taken do not imply guilt but are safeguarding mitigations. Both the student and the alleged perpetrator(s) will be informed in writing, and offered a face to face meeting to discuss any procedural concerns. All parties involved will be signposted to the appropriate support systems.

6.8 The person dealing with the formal allegation (hereafter referred to as the "Investigator" will undertake an investigation into the substance of the allegation using whatever means he/she feels appropriate. The Director of Operations or HR Assistant will facilitate the setting up of any meetings which are necessary. If a meeting with the student who has lodged the allegation takes place, the student may be accompanied by a fellow student, a Students' Union officer or a member of staff. If a meeting takes place with the person about whom the allegation has been lodged, that person may be accompanied by a fellow student/colleague, a Students' Union/Trades Union officer or a member of staff. That person will also be advised that support is available from the Chaplaincy team should they feel this would be helpful. The Investigator will attempt resolution of the allegation by a means appropriate to its nature and circumstances. Such means may include

- (a) Communication between the parties;
- (b) Negotiation between the parties;
- (c) Facilitation of a conciliation meeting between the parties;
- (d) If both parties agree, referral for mediation.

6.9 It is expected that the formal procedure should normally be completed by the Investigator and a written report submitted to the Principal within fifteen (15) working days of the appointment as Investigator. Where, for reasons of complexity or for other good reason, it is not possible to complete the formal procedure within this time scale the parties will be kept informed.

6.10 On receipt of the Investigator's report, the Principal will have ten (10) working days to provide a written response to all parties involved. The possible outcomes may include:

- (a) specific action to resolve the matter – this could be mediation, training, mentoring or disciplinary sanctions. This is not an exhaustive list;

- (b) dismissal of the allegation as being without foundation, with reasons given to the student in writing;
- (c) the Principal will also consider whether further action should be taken under the College's 'Conduct and Discipline of Students Policy' or the Conduct and Disciplinary procedure for faculty/staff and whether or not the police should be informed. If a penalty is to be imposed, the student concerned shall be given the opportunity to state his or her case prior to any decision being made. Please refer to the relevant policy or procedure to see the full range of possible outcomes.

6.11 If either student is not satisfied with the outcome of the formal allegation and believes that his or her allegation has not been handled properly or fairly according to these procedures, or if the student has new evidence which they were unable (for credible and compelling reasons) to provide with the formal allegation, the student may appeal the decision. The student must appeal by writing to the Chair of Governors, c/o Nazarene Theological College within ten (10) days of receipt of the formal response.

The appeal should include details of why the student remains dissatisfied and what resolution the student is seeking, and should include copies of correspondence exchanged during the preceding stages and any other relevant evidence.

Following the review of the appeal by the Chair of Governors, the student will be informed of the decision and the reasons for it plus the right to appeal to the University of Manchester, in writing. The Chair of Governor's decision will be final. If the student still remains dissatisfied, he/she may appeal to the University of Manchester (details will be on the University of Manchester website or via this link <https://documents.manchester.ac.uk/display.aspx?DocID=23875>).

7. Allegation of harassment by an NTC Employee

7.1 As indicated above, it is hoped that most cases of alleged harassment and/or bullying will be resolved by the informal procedures outlined above. The College, in keeping with its ethos, is committed to working with both parties to find an acceptable solution.

7.2 Formal action may be considered where informal action proves ineffective, or where a student feels that an informal approach is not appropriate. A formal allegation must be registered in writing by completing the form in Appendix 1, as soon as possible after the incident concerned. It is, however, recognised that allegations of this nature may relate to cumulative actions taking place over a period of time.

7.3 A formal allegation of harassment should include the nature of the allegation, with reference to dates, times and places (where possible) in relation to a specific incident(s). The names of any witness(es) to the incident(s) should also be included

7.4 The formal allegation should be addressed to the Director of Operations (who may take the matter to the Senior Leadership Team)

7.5 The Director of Operations will acknowledge receipt of the Allegation of Harassment form within five (5) working days and advise them that support is available from the Chaplaincy team should they feel this would be helpful. The Director of Operations will start the process to appoint an External to lead the allegation. The Director of Operations will inform the complainant once an appointment has been made.

7.6 The Senior Leadership Team shall consider whether or not the employee should be suspended pending investigation, as detailed in the Disciplinary Procedure of the Employee Handbook.

7.7 If the employee is not suspended pending investigation, the Senior Leadership Team shall consider whether any appropriate actions are required to mitigate any risk of harm to either party whilst the investigation is taking place.

7.8 The investigation into the allegation of harassment will then follow the procedure as stated in the Disciplinary Procedure of the Employee Handbook.

7.9 In implementing 7.8 the person dealing with the formal allegation will undertake an investigation into the substance of the allegation using whatever means he/she feels appropriate. The Director of Operations or HR Assistant will facilitate the setting up of any meetings which are necessary. If a meeting with the student who has lodged the allegation takes place, the student may be accompanied by a fellow student, a Students' Union officer or a member of staff.

7.10 The student who has lodged the allegation will be kept informed as appropriate throughout the investigation and will receive a written response from the Principal with the outcome of the investigation and any further actions which may be necessary.

7.11 If the student is not satisfied with the outcome of the formal allegation and believes that his or her allegation has not been handled properly or fairly according to these procedures, or if the student has new evidence which they were unable (for credible and compelling reasons) to provide with the formal allegation, the student may appeal the decision. The student must appeal by writing to the Chair of Governors, c/o Nazarene Theological College within ten (10) days of receipt of the formal response.

The appeal should include details of why the student remains dissatisfied and what resolution the student is seeking, and should include copies of correspondence exchanged during the preceding stages and any other relevant evidence.

Following the review of the appeal by the Chair of Governors, the student will be informed of the decision and the reasons for it plus the right to appeal to the University of Manchester, in writing. The Chair of Governor's decision will be final. If the student still remains dissatisfied, he/she may appeal to the University of Manchester (details will be on the University of Manchester website or via this link <https://documents.manchester.ac.uk/display.aspx?DocID=23875>).

7.12 Formal allegations about the Director of Operations, Vice Principal or Dean should be referred to the Principal.

7.13 Formal allegations about the Principal should be referred to the Chair of the Board of Governors.

8. Allegation of harassment by a student against an NTC employee

8.1 As indicated above, it is hoped that most cases of alleged harassment and/or bullying will be resolved by the informal procedures outlined above. The College, in keeping with its ethos, is committed to working with both parties to find an acceptable solution.

8.2 Formal action may be considered where informal action proves ineffective, or where an employee feels that an informal approach is not appropriate.

8.3 A formal allegation must be registered in writing by the employee, following the details set out in the Grievance Procedure in the Employee Handbook.

8.4 The student shall have access to any necessary support and shall be kept informed throughout the process.

8.5 The student will receive a written response from the Principal with the outcome of the investigation and any further actions which may be necessary.

8.6 If the student is not satisfied with the outcome of the investigation and believes that his or her investigation has not been handled properly or fairly according to these procedures, or if the student has new evidence which they were unable (for credible and compelling reasons) to provide with the formal allegation, the student may appeal the decision. The student must appeal by writing to the Chair of Governors, c/o Nazarene Theological College within ten (10) days of receipt of the formal response.

The appeal should include details of why the student remains dissatisfied and what resolution the student is seeking, and should include copies of correspondence exchanged during the preceding stages and any other relevant evidence.

Following the review of the appeal by the Chair of Governors, the student will be informed of the decision and the reasons for it plus the right to appeal to the University of Manchester, in writing. The Chair of Governor's decision will be final. If the student still remains dissatisfied, he/she may appeal to the University of Manchester (details will be on the University of Manchester website).

9. Online activity

9.1 Bullying and harassment may occur online. This includes potentially discriminatory or offensive material posted on public access websites or social networking sites. Online harassment and bullying will be dealt with under the procedures outlined above. Such behaviour may also be considered a breach of the Student Acceptable Use of IT Policy.

10. Monitoring of the Policy

10.1 The Senior Leadership Team will keep the implementation of this policy under review and will monitor its use.

Policy title:	Student Policy on Harassment (formerly Policy on Harassment and Bullying for Students)
Policy Date approved:	October 2014
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Next review date:	September 2026
Related policies:	Safeguarding Policy; Student Policy on Sexual Misconduct; Policy on Conduct and Discipline of Students
Lead contact:	Director of Operations

APPENDIX 1

Allegation of Harassment Form

Your full name	
Student ID number	
Date	
Please contact me via (either put phone number or email address)	
Date of incident	
Location of incident	
Brief summary of incident including persons involved (and witnesses, if any)	

Please email completed form to either the Director of Operations (pmckendrick@nazarene.ac.uk) or the Vice Principal/Dean (jlett@nazarene.ac.uk)