

Policy on Harassment, Sexual Misconduct and Related Behaviours

Policy owner	Northern School of Contemporary Dance: Leadership Team
Tier	1
Lead contact	Head of Quality & Compliance
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Related legislation	Equality Act 2010; Protection from Harassment Act 1997; Data Protection Act 2018; Higher Education (Freedom of Speech) Act 2023
Related policies	Non-Academic Misconduct Policy; Student Complaints Procedure; Support Through Studies Policy; Emergency Powers of Suspension; School Safeguarding Policy; HR Disciplinary and Grievance Procedures
Equality & Diversity	Available in accessible formats on request. Dedicated support provided to all parties involved in procedures under this policy.

This policy was drafted in accordance with OfS Condition of Registration E6 (effective 1 August 2025), the OIA Good Practice Framework (November 2025 consultation), Universities UK's Changing the Culture guidance, and good practice from across the higher education sector.

This document was produced with the assistance of artificial intelligence tools for drafting and editing purposes. All content has been reviewed, amended where necessary, and approved by the author(s), who retain full responsibility for the final content.

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Policy on Harassment, Sexual Misconduct and Related Behaviours

1. Introduction

Northern School of Contemporary Dance (NSCD or 'the School') is committed to creating a safe, respectful and inclusive environment for everyone in our community for students, staff, visitors and applicants. We have a zero-tolerance approach to harassment, sexual misconduct and any related unacceptable behaviours.

This policy sets out what we mean by harassment, sexual misconduct and related behaviours, what you can expect from us if you experience or witness such behaviour, and how we will handle any report or complaint. It applies to everyone connected with NSCD.

NSCD is a Higher Education Provider registered with the Office for Students (OfS). This policy has been drafted to comply with the OfS Condition of Registration E6 (Harassment and Sexual Misconduct), effective 1 August 2025, and is informed by the OIA's draft Good Practice Framework: Handling reports of harassment and sexual misconduct (consultation published November 2025).

Our commitments are:

- To maintain an environment where everyone is treated with dignity and respect.
- To take all reports of harassment and sexual misconduct seriously.
- To provide timely, ongoing support to anyone who has experienced, witnessed or been affected by such behaviour.
- To investigate all complaints promptly, fairly, independently and consistently.
- To protect both those making reports and those responding to allegations throughout any process.
- To ensure that both parties receive the same high-quality, compassionate support throughout.
- To continuously improve how we prevent and respond to these issues.

NSCD is committed to the prevention of harassment and sexual misconduct through ongoing training for staff and students. Details of this training, including its content and frequency, are published in the single source of information on harassment and sexual misconduct, available on the NSCD website.

Non-Disclosure Agreements

NSCD will not use non-disclosure agreements (NDAs), or any other form of agreement, to prevent students, staff or anyone else from disclosing or discussing allegations or experiences of harassment or sexual misconduct. This is a requirement of OfS Condition E6, effective from September 2024.

1.1 Who and what this policy covers

This policy applies to all students registered with the Northern School of Contemporary Dance (NSCD), whether they are studying at NSCD or on an NSCD-registered course delivered by a

franchise partner provider, and regardless of mode or location of study. Where a student is studying with a franchise partner provider, this policy applies in addition to any equivalent policies of that partner; in the event of any conflict, this policy takes precedence in respect of the student's status as an NSCD-registered student.

This policy covers you if you are a student registered at NSCD, a member of staff (including temporary or contracted staff), an applicant, a visitor, or any individual who interacts with NSCD. It applies whether you are the person reporting an incident, the person the report is about, or a third party who has witnessed something.

The policy applies to behaviour that takes place:

- On NSCD premises or during any NSCD activity (including performances, trips and placements).
- Online or via social media, even if it takes place outside of NSCD premises or hours.
- Outside NSCD, for example off-campus socialising connected to NSCD, or any behaviour linked to your studies or employment.
- At any time during your registration or employment with NSCD, including outside term time.

1.2 Other resources you should know about

This policy works alongside a number of other NSCD policies referred to in section 9. All policies are available on the NSCD website at www.nscd.ac.uk/policies-and-procedures/

In line with Office for Students (OfS) Condition of Registration E6, NSCD has published a 'single comprehensive source of Information' which includes external and internal support resources.

This can be accessed here: <https://www.nscd.ac.uk/harassment-sexual-misconduct/>

2. Definitions

OfS E6 and OIA Compliance

The definitions in this section align with those required by OfS Condition E6 and reflect the terminology used in the OIA's draft Good Practice Framework: Handling reports of harassment and sexual misconduct.

2.1 Definitions of terms used within this policy

Reporting Student / Complainant

A person who makes a report, raises a concern or brings a complaint under this policy. In line with OIA good practice terminology, this document uses 'reporting student' where the person is a student. The term 'complainant' is used where the person may be a member of staff or external to NSCD.

Responding Student / Respondent

A person who is the subject of a report or complaint. 'Responding student' is used where the person is a student; 'respondent' where they are a member of staff or external to NSCD.

Disclosure

When someone tells us they have experienced or witnessed behaviour that falls within the scope of this policy, whether or not they wish to make a formal complaint or take further action.

Designated Support Contact	A member of NSCD staff appointed to provide ongoing support to a reporting or responding student throughout the process, this would typically be a member of the student support team. In line with OIA good practice, this person does not carry out any investigatory function in the case.
Officers of the School	Members of NSCD staff (or External Officers appointed by NSCD) responsible for operating the procedures in this policy.
External Officers	Individuals from outside NSCD, for example from a similar specialist arts institution, who may be appointed to assist with or carry out parts of our procedures to ensure independence and impartiality.
Initial Supporter	The member of NSCD staff who is the first point of contact when a disclosure or report is made. They provide immediate, non-judgmental support to the person making the disclosure and do not test the accuracy or truthfulness of the account at this stage.
Early Investigation Officer	A member of NSCD staff (or External Officer) who carries out the Early Investigation at Stage 1 and determines next steps. This role is kept separate from the Designated Support Contact role.
Non-recent allegations	Allegations about events where the passage of time is a significant factor in what action is possible. Incidents reported more than six months after they occurred may be considered non-recent, though this will always depend on individual circumstances, including the reasons why a person may not have been able to come forward sooner.
Anonymous allegations	Allegations where the reporting person, the responding person, or both are not identified.

2.2 Definitions of prohibited behaviours

The following definitions are required by OfS Condition E6 and apply throughout this policy and its procedures.

Harassment

Harassment has the meaning given in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997.

Under the Equality Act 2010, harassment is unwanted conduct related to a protected characteristic (such as age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation) that has the purpose or effect of:

- violating a person's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment.

Under the Protection from Harassment Act 1997, harassment also includes a course of conduct that the person knows, or ought to know, amounts to harassment of another. This

means repeated unwanted behaviour directed at a person can constitute harassment regardless of whether it relates to a protected characteristic.

A single incident can amount to harassment. Harassment can occur even where the person carrying it out did not intend to cause offence.

Sexual Misconduct

Sexual misconduct means any unwanted or attempted unwanted conduct of a sexual nature. This broad definition covers a wide range of behaviour, including but not limited to:

- sexual harassment (see below)
- sexual assault and sexual violence
- non-consensual sharing of sexual images or videos
- unwanted sexual touching, comments or advances

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment is a form of both harassment and sexual misconduct and is therefore covered by both definitions above.

Intimate Personal Relationships (Staff–Student)

An intimate personal relationship includes any relationship involving physical intimacy (including isolated or repeated sexual activity) and/or emotional intimacy between a member of staff and a student.

‘Relevant staff member’ means any member of NSCD staff who holds a position of power or authority in relation to a student, for example a teacher, tutor, mentor, supervisor or anyone involved in assessing or supporting a student.

‘Abuse of power’ occurs where a relevant staff member exploits their position of authority over a student in a way that applies pressure, whether explicitly or implicitly, such that the student does something (or refrains from doing something) that could reasonably result in an intimate personal relationship. NSCD prohibits any abuse of power in this context.

Related Behaviours

Related behaviours are other unacceptable behaviours that do not fall squarely within the definitions of sexual misconduct or harassment but are nonetheless considered a breach of this policy. This is a broad category designed to capture any conduct that breaches the relationship of trust and confidence between an individual and NSCD.

Consent

Consent means agreeing by choice to participate in an activity (including a sexual activity), where the person has both the freedom and capacity to make that decision.

Key principles:

- Consent cannot be assumed because of a previous relationship or previous consent.

- Consent to one activity does not mean consent to another.
- Consent can be withdrawn at any time, including during an activity.
- Capacity to consent may be affected by alcohol, drugs, age or other factors.
- Silence or absence of resistance does not mean consent.

2.3 Examples of behaviour that would breach this policy

The following is a non-exhaustive list. If you are unsure whether a behaviour falls within the scope of this policy, please contact Student Services or the Quality Office for advice.

- Engaging in, or attempting to engage in, sexual contact without consent.
- Sharing private sexual images or videos of another person without their consent (including online).
- Unwanted kissing, touching or other physical contact of a sexual or intimate nature.
- Inappropriately exposing sexual organs to another person.
- Making unwanted sexual remarks, gestures or noises.
- Making inappropriate comments about a person's appearance, dress or body.
- Stalking - including following, watching, spying on or forcing contact with someone, including via social media.
- Repeatedly engaging in unwanted contact with a person, including online (note: repeated incidents are considered more serious than a single act).
- Controlling and coercive behaviour - for example behaviour that causes serious alarm or distress, restricts a person's freedoms, or involves emotional blackmail.
- Grooming behaviours - for example isolating someone to create dependency, exploiting a position of power or trust, or manipulating through gifts or favours.
- Gaslighting - psychologically manipulating someone to make them doubt their own memory, perception or sanity.
- Targeting an individual or group because of a protected characteristic in a way that is likely to intimidate, offend or harm.
- Publishing false or harmful material about a person without their consent, whether online or in print.
- Monitoring another person's communications or online activity without consent.
- Interfering with, or restricting access to, another person's property.
- Any abuse of power by a member of staff in relation to a student, including in the context of an intimate personal relationship.

3. Scope and Principles

3.1 Where and when this policy applies

This policy applies to any report of harassment, sexual misconduct or related behaviour regardless of where or when it occurred, provided there is a connection to NSCD. Reports can be made by students, staff, or anyone external to NSCD. The policy applies whether a student is the person making a report or the subject of one.

You can raise a complaint under this policy regardless of whether you have also reported the matter to the police. If you have made a police report, please see Part 2: Procedure, for guidance on how NSCD will handle matters alongside a police investigation.

3.2 Core principles

All processes under this policy are guided by the following principles, which reflect both OfS E6 requirements and OIA good practice:

- Zero-tolerance for harassment, sexual misconduct and related behaviours.
- Support-first: providing immediate, ongoing support to those who disclose or report, and to responding students.
- Fairness and natural justice for all parties.
- Independence: keeping support and investigatory roles separate.
- Transparency: keeping all parties informed throughout.
- Timeliness: handling cases as promptly as circumstances allow.
- Trauma-informed approach: understanding that reporting students may not come forward for some time or may have continued to interact with the responding person, and that these are not indicators of false reporting.
- Proportionality: responding in a manner proportionate to the circumstances.
- Dignity: treating everyone involved with respect throughout.

4. Responsibilities

All members of the NSCD community - students, staff, franchise partner providers and visitors are responsible for:

- Behaving consistently with this policy and treating others with dignity and respect.
- Reporting behaviour they believe breaches this policy.
- Cooperating with any investigation or process under this policy.

Members of staff also have a responsibility to:

- Always maintain appropriate professional boundaries with students.
- Be aware of power dynamics and not exploit their position.
- Refer disclosures appropriately and/or act as an Initial Supporter where required, without testing the truthfulness or accuracy of what they are told.
- Act as a Designated Support Contact when appointed, keeping this role entirely separate from any investigatory role.

NSCD and Franchise partner provider as institutions are responsible for:

- Making this policy freely available, easy to understand, and accessible in different formats on request.
- Providing training on preventing and addressing harassment and sexual misconduct, including trauma-informed approaches.
- Ensuring all those involved in investigations and panels receive appropriate training.
- Operating procedures that are fair, consistent, timely, independent and appropriately confidential.
- Ensuring both reporting and responding students have access to ongoing, compassionate support throughout any process.
- Monitoring and reviewing outcomes and reporting annually to the Board of Governors.
- Complying with OfS Condition E6 and all relevant legislation.
- Ensuring no non-disclosure agreements (NDAs) are used in relation to allegations of harassment or sexual misconduct.

5. How we communicate this policy

This policy is published on the NSCD and franchise partner provider websites and the Virtual Learning Environment, and is referenced in student and staff induction materials. We will make every effort to provide this policy in an accessible format on request.

If you need this document in a different format, such as large print or easy read please contact the Quality Office at quality.office@nscd.ac.uk.

6. Legal and Regulatory Framework

This policy has been developed in accordance with the following legislation and regulatory requirements:

- Equality Act 2010 (sections 26 and 27)
- Protection from Harassment Act 1997
- Data Protection Act 2018 and UK GDPR
- Higher Education (Freedom of Speech) Act 2023
- OfS Condition of Registration E6: Harassment and Sexual Misconduct (effective 1 August 2025)
- OIA Good Practice Framework: Handling reports of harassment and sexual misconduct
- OIA Good Practice Framework: Disciplinary Procedures

NSCD is a subscriber to the Office of the Independent Adjudicator for Higher Education (OIA). Students have the right to refer unresolved complaints to the OIA once NSCD's internal procedures have been completed. The OIA's decisions are informed by whether the provider's processes meet OIA good practice standards.

7. What happens if this policy is breached

A breach of this policy occurs when an individual engages in unacceptable behaviour of a sexual, harassing or related nature that damages the relationship of trust and confidence between the individual and NSCD or franchise partner provider.

If a student is found to have breached this policy, this may constitute misconduct and may be referred into the Non-Academic Misconduct Policy. Possible outcomes include support interventions, educational measures, formal warnings, or in serious cases, suspension or expulsion.

If a member of staff is found to have breached this policy, this may constitute a disciplinary offence and will be referred into the relevant HR procedures. Possible outcomes range from warnings to dismissal, depending on the severity of the breach.

NSCD takes seriously any reports that are found to be vexatious or malicious. Where a report is made in bad faith, this may itself be treated as a breach of this policy. However, a report that is found not to be substantiated is not the same as a malicious report, the fact that an allegation is not upheld will not, of itself, lead to action against the reporting student.

8. How to raise a concern or make a report

You can raise a concern or make a report in any of the following ways:

- By speaking to any member of NSCD staff you feel comfortable approaching, they will support you without judging you.
- By completing the online NSCD Concerns Form (anonymously or named): [Concerns Form](#)

- By emailing Student Services at studentservices@nscd.ac.uk
- By contacting the Head of Quality & Compliance at quality.office@nscd.ac.uk
- By completing the Stage 1 Report Form (available at www.nscd.ac.uk/policies-and-procedures/) and submit this via email to the Quality Office quality.office@nscd.ac.uk .

Whichever route you use, if your concern relates to harassment, sexual misconduct or related behaviour it will normally be referred into the Stage 1 process under this policy in the first instance.

You can make a report at any time. NSCD does not have a strict time limit for reporting, although incidents reported more than six months after they occurred may be considered non-recent (see Part 2 of this policy for more information). NSCD recognises that there are many reasons why a person may not feel able to come forward straight away, and this will always be taken into account.

If you have already reported something to the police, you can still report to NSCD. Our internal processes can run alongside a police investigation. We will always support you to report to the police if you wish to do so.

The OIA's draft Good Practice Framework recommends that both reporting and responding students are offered a Designated Support Contact, a named person who provides ongoing support and a point of contact throughout the process, but who has no investigatory role. NSCD commits to providing this support to all students involved in a process under this policy. To ensure impartiality and avoid any conflict of interest, the Designated Support Contact assigned to a complainant will always be a different person from the one assigned to the respondent.

9. Related documents

- Non-Academic Misconduct Policy
- Support Through Studies Policy
- Emergency Powers of Suspension
- Criminal Records Policy
- Student Complaints Procedure
- School Safeguarding Policy
- NSCD Inclusivity Guides
- NSCD Privacy Policy
- HR Disciplinary and Grievance Procedures (staff)

All student-facing policies: www.nscd.ac.uk/policies-and-procedures/

10. Key contacts

Name / Team	Role	Contact
Student Services	Student support and general enquiries	studentservices@nscd.ac.uk
Quality Office	Policy oversight and formal complaints	quality.office@nscd.ac.uk
School Safeguarding Officer	Safeguarding concerns	safeguarding@nscd.ac.uk
Police (emergency)	If you are in immediate danger	999

PART 2

Procedure on Harassment, Sexual Misconduct and Related Behaviours

Before you read this procedure

Please make sure you have read Part 1 (the Policy) first, as this section builds on the definitions and principles set out there. The Stage 1 procedure below applies to all reports, whether the person reported is a registered student (at NSCD or franchise partner provider), member of staff or someone external to NSCD.

Stage 1: Initial Support and Early Investigation Procedure

1. What is Stage 1?

Stage 1 is the first step in the process for handling reports of harassment, sexual misconduct and related behaviours. It has two connected purposes:

SUPPORT

To provide immediate, ongoing support; identify what further help you need; and explore your options - including what, if any, action you would like NSCD or a franchise partner provider to take.

EARLY INVESTIGATION

To gather the information needed to decide on appropriate next steps - for example whether to take formal action, refer to another procedure, or close the matter.

Stage 1 is flexible by design. Not every case will follow the same path, and the process is designed to respond to the individual needs of each person involved. Some cases may be concluded at Stage 1; others may be referred into further procedures such as the Non-Academic Misconduct Policy or HR procedures.

Where the reporting or responding student is enrolled with a franchise partner provider, Stage 1 of this procedure will usually be managed by the partner provider, in line with the procedures detailed below and in liaison with NSCD where appropriate.

2. How Stage 1 is triggered

Stage 1 is triggered in any of the following circumstances:

Situation	What happens
A report about a student is received	Stage 1 Initial Support Meeting is held. This meeting will usually be facilitated by the Head of Student Support,

	who is trained to manage disclosure sensitively. A Stage 1 Report is completed. The matter may be referred to the Non-Academic Misconduct Policy and/or Precautionary Measures may be considered. The reporting person is offered a Designated Support Contact.
A report about a member of staff is received	Stage 1 Initial Support Meeting is held. The matter will be referred to the relevant HR procedure if appropriate. The matter cannot progress beyond Stage 1 under this policy. The reporting person is offered a Designated Support Contact.
A report about someone external to NSCD is received	Stage 1 Initial Support Meeting is held. Next steps are determined in consultation with the reporting person, including referral to external support and whether to involve the police. A Designated Support Contact is offered.

3. The Stage 1 process step by step

Step 1: Initial disclosure and support

When you make a report or disclosure, the first person you speak to is your Initial Supporter. This can be any member of staff. Their role at this stage is to:

- Listen to you and provide immediate, non-judgmental support.
- Not test the truthfulness or accuracy of what you are telling them.
- Record what you tell them using the Stage 1 Report Form.
- Explain what options are available, this may include signposting through the appropriate channels and may include your right not to take any formal action.
- Offer you a Designated Support Contact for ongoing support.
- Refer the report to the Quality Office who may appoint an Early Investigation Officer if appropriate.

Step 2: Designated Support Contact

You will be offered a Designated Support Contact - this may be the same person who acted as the Initial Supporter. The Designated Support Contact will:

- Be your main point of contact and source of support throughout the process.
- Provide ongoing support at every stage, not only at set points in the procedure.
- Keep you informed of progress in your case.
- Have no investigatory function, this role is kept entirely separate from the Early Investigation Officer role.

If you are a responding student, you will also be offered a Designated Support Contact. The OIA's good practice guidance is clear that both reporting and responding students should receive the same high quality, compassionate support throughout. To ensure impartiality and avoid any conflict of interest, the Designated Support Contact assigned to a complainant will always be a different person from the one assigned to the respondent.

Step 3: Referral to the Early Investigation Officer

Your Initial Supporter will usually not act as the Early Investigation Officer but may refer your report to a different member of staff to take on this role. You will be told if this is happening and asked to agree before your report is passed on.

The Early Investigation Officer will:

- Review the information you have provided.
- Gather further information as needed to decide on next steps.
- Meet with you if appropriate and will usually meet with the responding student/s.
- Complete the final Stage 1 Report.

Your information is handled carefully

Before any information is passed on, you will be shown what has been recorded and asked to agree. You will also be told what information may be shared with the responding student if formal action is taken. Your data is processed in accordance with the Data Protection Act 2018 and UK GDPR.

Step 4: The Early Investigation

The Early Investigation Officer gathers information and decides what action (if any) to take. This process is thorough but sensitive and proportionate. They will take your wishes into account, but the final decision rests with the Early Investigation Officer, they may need to act contrary to your wishes where there are safeguarding concerns.

Step 5: Decision on next steps

Once the Early Investigation is complete, the Early Investigation Officer will decide what happens next. Possible outcomes include:

- No further formal action (you will still receive support and be given a clear explanation of the decision).
- Referral to the Non-Academic Misconduct Policy (for student respondents).
- Referral to Stage 2 Alternative Resolution (for student-to-student cases only - see below).
- Referral to HR processes (for staff respondents).
- Referral to or support with reporting to the police (always discussed with you first, unless there are overriding safeguarding concerns).
- Precautionary measures while the investigation continues (see Section 4).

You will be informed of the outcome of Stage 1, and the reason for it, as soon as reasonably practicable. You will be kept informed at all stages, not only at the conclusion of the process.

NSCD commits to informing both parties of the outcome of Stage 1 and any subsequent stages, with appropriate explanation, as far as possible within data protection constraints.

4. Precautionary Measures

In some cases, NSCD may put precautionary measures in place while a case is being investigated. These are temporary protective measures, not a finding of guilt, designed to ensure a fair investigation and protect those involved. They are applicable to students only, not to staff.

Precautionary measures may include:

- A no-contact condition between the reporting and responding student.
- a reassignment of timetabled groups to ensure the complainant and respondent are not scheduled to work or study in the same group.
- A temporary restriction on access to certain areas of the School.
- In serious cases, temporary suspension from the School, in line with the Emergency Powers of Suspension Policy.

If you are a responding student and precautionary measures are imposed on you, you have the right to make written representations to the CEO & Principal about the decision. You will be given a clear written explanation of why measures have been imposed.

Precautionary measures will be kept under review throughout the process and will be lifted or adjusted if circumstances change.

Please refer to Appendix C on the NSCD website for full details of the Precautionary measures procedures.

5. Stage 2: Alternative Resolution

Where both the reporting and responding students are students of NSCD or a franchise partner, and the Early Investigation Officer considers it appropriate, the case may be referred to Stage 2 Alternative Resolution. This provides an alternative to a formal disciplinary process.

There are two forms of Alternative Resolution:

- Alternative Resolution by Agreement (Route B1) - a structured process in which both parties reach an agreed outcome without a formal panel hearing.
- Alternative Resolution by Panel (Route B2) - a panel process that considers the matter and reaches a resolution.

The OIA's draft Good Practice Framework advises that direct mediation between a reporting student and a responding student is generally not appropriate in cases involving sexual misconduct or serious harassment. NSCD will not offer direct mediation in such cases. Any Alternative Resolution process offered will be structured, supported and subject to the safeguards set out in Appendix B.

Where a reporting student decides they do not wish to pursue any further action, neither alternative resolution process will be entered into without their agreement.

Please refer to Appendix B on the NSCD website for full details of the Alternative Resolution procedures.

6. Non-recent allegations

There is no strict time limit on reporting at NSCD. Incidents reported more than six months after they occurred may be considered non-recent by the Early Investigation Officer. This does not mean NSCD will not take action but the passage of time may affect what action is possible, depending on evidence and circumstances.

NSCD is mindful that delayed reporting is common in cases of harassment and sexual misconduct and is not an indicator that the allegation is less credible or serious.

The Early Investigation Officer will consider factors including:

- The availability of evidence.
- Whether there were reasons that prevented you from reporting earlier, for example fear of consequences, not being aware of the policy, the School being closed, or the emotional impact of the experience.
- Whether the allegations form part of a wider pattern of behaviour.

Even where a matter is considered non-recent, you will always be offered support, including referral to external services and NSCD or franchise partner providers will always support you to report to the police if you choose to do so.

7. Anonymous reports

You can make an anonymous report to NSCD. We understand there may be many reasons why you might not feel comfortable identifying yourself.

However, an anonymous report may limit what action NSCD can take, particularly if the responding person cannot be identified or the reporting person cannot be contacted for further information. We will always do what we can in response to an anonymous report, but our ability to investigate and take formal action may be limited.

Where an anonymous report is received, a member of the NSCD Quality Office will normally act as Early Investigation Officer and will file a Stage 1 Report, consulting senior safeguarding colleagues as appropriate to determine whether any further action is possible or necessary.

8. Reports involving the police

You have the right to report any incident to the police at any time, regardless of whether you have also reported it to NSCD. NSCD's internal processes and a police investigation can run alongside each other.

If you have made a police report, NSCD will work carefully to ensure our internal process does not interfere with the police investigation. In some cases we may need to pause our internal process while a police investigation is ongoing, we will keep you informed throughout. NSCD cannot make criminal determinations: our investigation focuses only on whether this policy (or another NSCD policy) has been breached.

Please refer to Appendix D on the NSCD website for full procedures where allegations have been reported to the police.

9. Your rights during the process

9.1 Rights of the reporting student

- To be listened to without your account being tested for credibility at the point of first disclosure.
- To be offered a Designated Support Contact at the outset and throughout the process.
- To be kept informed of what is happening with your case at all stages, not only at the conclusion.
- To know what information about your case has been or will be shared with the responding student.
- To withdraw your report at any time. NSCD may continue to act if there are safeguarding concerns.
- To be informed of the outcome of Stage 1 (and subsequent stages) with an explanation.
- To complain about the handling of Stage 1 using the Student Complaints Procedure.
- To refer an unresolved complaint to the OIA once NSCD's internal procedures are complete.

Withdrawing your report

You can withdraw your report at any time by notifying the Early Investigation Officer in writing. NSCD may still need to act in some circumstances, for example if there are serious safeguarding concerns. You do not need to give a reason for withdrawing, but you must provide written confirmation.

9.2 Rights of the responding student

- To be told about the allegations made against you, in sufficient detail to be able to respond.
- To be offered a Designated Support Contact at the outset and throughout the process.
- To have a genuine opportunity to respond to the allegations against you.
- To challenge and question the evidence against you.

- To be treated fairly and with dignity throughout the process.
- To be informed of the outcome of Stage 1 (and subsequent stages) with an explanation.
- To make representations if precautionary measures are imposed on you.
- To be informed that any admissions, representations or notes may be used as evidence in later proceedings.
- To complain about procedural errors at Stage 1 using the Student Complaints Procedure.

NSCD commits that a responding students should receive the same high-quality, compassionate support as reporting students throughout the process. Being the subject of an allegation can be very stressful. NSCD's Designated Support Contact for the responding student is entirely separate from those supporting the reporting student.

10. Timeframes

NSCD aims to handle all cases as promptly as possible while being thorough, sensitive and fair to everyone involved. We understand delays in resolving cases can cause significant distress to all parties. You will always be informed if there is likely to be a delay, with an explanation and indicative timeline.

11. How we handle your information

NSCD takes data protection seriously. All information you share under this policy will be held confidentially and used only for the purposes of managing your case.

In some circumstances we may need to share information with other parties, for example with a franchise placement provider, the police, placement providers or the governing body, but only where we have a lawful basis to do so. We will inform you of any such sharing where possible. For full details of how we process your data, please refer to the NSCD Privacy Policy at <https://www.nscd.ac.uk/privacy-notices/>

12. Monitoring and review

NSCD will report to its Board of Governors at least annually on the operation of this policy, including the number and nature of cases received, outcomes, and any recommendations for improvement. This forms part of our commitment to learning and continuously improving our response to harassment and sexual misconduct, as required by OfS Condition E6.

This policy will be reviewed at least every three years, or sooner if required by changes to legislation or regulatory requirements (including OfS conditions or OIA good practice updates).

13. Appendices

For further details including the Stage 1 Report form, the Stage 2 Alternative Resolution Procedures (student-to-student cases), Precautionary Measures Procedure, guidance on cases involving the police, and the Risk Assessment framework, please refer to the relevant appendices available on the NSCD website: www.nscd.ac.uk/policies-and-procedures/

Appendix A: Stage 1 Report Form

Appendix B: Stage 2 Alternative Resolution

Appendix C: Precautionary Measures

Appendix D: Procedures for Reports involving the Police

Appendix E: Risk Assessment
