

Caspian School of Academics Harassment and Sexual Misconduct Condition E6 Policy – Office for Students Compliance

1. Purpose and scope

This policy sets out the Caspian School of Academic's (CSA) commitment to protecting students from harassment and sexual misconduct, in compliance with the Office for Students' (OfS) Condition E6.

It applies to:

- All students enrolled at CSA, including those studying via partnerships and franchises, whether on campus or through blended learning.
- All staff, contractors, and third parties engaging with students and to the students themselves.
- All activities conducted on or off campus, including placements and field trips/visits.

CSA aims to foster a learning and working environment where all members of the community feel safe, respected, and supported.

2. Definitions

For the purposes of this policy:

Harassment means unwanted behaviour related to a relevant protected characteristic (as defined in the Equality Act 2010) that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual misconduct includes, but is not limited to, sexual harassment, sexual assault, rape, stalking, and any other unwanted sexual acts or communications.

Single Comprehensive Source of Information (SCSI) refers to this policy and related resources, which provide clear guidance on prevention, reporting, response, support, and rights.

3. Our commitment

CSA is committed to:

- Taking significant and credible action to prevent harassment and sexual misconduct
- Providing clear, accessible information on how students and staff can report concerns
- Offering appropriate support to those affected, whether complainants, witnesses, or respondents



- Handling all reports fairly, promptly, and sensitively, ensuring procedural fairness
- Banning the use of non-disclosure agreements (NDAs) to silence students in harassment or sexual misconduct cases
- Upholding **freedom of speech** and academic freedom, ensuring that measures to prevent harassment do not unduly restrict lawful debate or teaching.

4. Preventive measures

We have implemented a range of actions to reduce the risk of harassment and sexual misconduct, including:

- Mandatory training for all students and staff on harassment, consent, reporting procedures, and active bystander intervention
- Awareness campaigns promoting respect, inclusivity, and safe campus environments
- Anonymous reporting tools and clear reporting pathways
- Specialist support services for survivors and accused students
- Policies regulating staff-student relationships (see Section 8)

5. Reporting and handling incidents

Students, staff, and third parties can report harassment or sexual misconduct through the following channels:

- Online reporting platform: <u>www.caspianschool.ac.uk/incidents</u>
- Email to incidents@csa.acuk
- In-person to Student Services Office student advisor.

Reports can be made both through disclosing identity of the complainant and anonymously:

• By the individual affected or a third party.

All reports will be handled in accordance with the following principles:

- Fairness: ensuring impartiality for all parties involved
- Sensitivity: recognising the impact of trauma and respecting confidentiality



• Transparency: communicating outcomes and decisions to relevant parties

Outcomes may include informal resolution, disciplinary action, safeguarding interventions, or referrals to external authorities where appropriate.

6. Support for students

At the Caspian School we provide tailored support to:

- Students who report harassment or sexual misconduct
- Students accused of harassment or sexual misconduct
- Witnesses or others affected

Support includes:

- Counselling and wellbeing services
- Academic adjustments if needed (e.g., deadline extensions)
- Assistance in reporting to police or accessing external specialist services
- Named support contacts for case management
- Support is available regardless of whether a formal complaint is made.

7. Training and awareness

Training is mandatory for:

- All students (during induction and periodically throughout study)
- All staff, including academic, administrative, and frontline support teams including those involved in recruitment and marketing activities
- Staff in specialist roles (e.g., incident investigators and student advisors) who will receive enhanced training

The Training provided to CSA Staff covers:

- Definitions and examples of harassment and sexual misconduct
- Consent and respectful relationships
- How to report concerns and where to access support
- Freedom of speech and academic freedom considerations

Training materials are evidence-based and reviewed regularly for effectiveness.



8. Staff-student relationships

To protect students from potential abuse of power:

- Staff are prohibited from entering into romantic or sexual relationships with any student over whom they have academic, professional, or pastoral responsibility.
- Any existing or developing intimate personal relationships between staff and students must be formally disclosed to the Director of Human Resources and/or the Principal.

Failure to disclose or any breach of this policy may result in disciplinary action.

Further guidance is available in Procedure 7.10 Staff Code of Conduct in Respect of Students www.caspianschool.ac.uk/singlecomprehensivesourceofinformation

9. Freedom of speech and academic freedom

This policy is implemented consistently with CSA's obligations to uphold freedom of speech and academic freedom. Exposure to lawful academic content, discussion of controversial ideas, or participation in open debate, even if upsetting to some, does not constitute harassment unless it is targeted, personal, and unlawful.

10. Monitoring and continuous improvement

The Caspian School of Academics will:

- Monitor reports and case outcomes
- Evaluate the effectiveness of this policy through feedback, surveys, and data analysis
- Review and update this policy annually
- Report on compliance with Condition E6 to the governing body
- Publish an updated version of this Comprehensive Source of Information each year

11. Version control and accessibility

• Date of first publication: June 2025

Next review date: January 2026

Responsible Office: Compliance (Principal's Office)

This policy is accessible without login at:

www.caspianschool.ac.uk/singlecomprehensivesourceofinformation



Archived versions are available at:

https://drive.google.com/drive/u/0/folders/12KEqGoMes1ttTAzGaMTyAzhFwUK3z8nj

For any questions or assistance regarding this policy, please contact mandyhobart@caspianschool.ac.uk

Appendix: Quick reporting guide

Type of report	How to report	Support available
Named Report	Online platform, email, or in-person	Case manager assigned, full investigation, academic and wellbeing support
Anonymous Report	Online platform	Monitored trends, limited action possible, support signposting