

BULLYING, HARASSMENT AND VICTIMISATION POLICY FOR STUDENTS

INTRODUCTION

As part of the University's ongoing commitment to Equity, Diversity, and Inclusion, it strives to create an inclusive culture that promotes equality, values diversity, and ensures a working, learning, and social environment where the rights and dignity of all members of the University community are respected.

1. PURPOSE

1.1. This Policy outlines the University's approach to preventing bullying, harassment and victimisation (see [Annex A](#) for definitions) as well as how the University will respond to any allegations. It is intended to ensure students and staff are aware of reporting and support routes, as well as comply with regulatory requirements under [Condition of Registration E6: Harassment and Sexual Misconduct \(Office for Students\)](#). The University also has a duty under the [Equality Act 2010](#) to have due regard for the need to eliminate discrimination, harassment and victimisation, and other conduct prohibited by the act.

1.2. All students studying at all levels, including but not limited to apprentices, overseas students, students on placements and partnership students are required to comply with this policy in addition to any professional guidelines, for example students studying on professional programmes. For students studying at partner institutions or on placements, the University will liaise with relevant parties to ensure support and reporting options are in place.

1.3. Any allegation of harassment, bullying or victimisation will be treated seriously in line with the relevant legislation including, but not limited to, [The Equality Act 2010](#), the [Protection from Harassment Act 1997](#) and the University will also act in compliance with the requirements of the Office for Students.

1.4. The University also has dedicated guidance and support for cases of Sexual Violence in compliance with the specific OFS regulatory condition E6. More details can be found in the [Sexual Violence and Misconduct Policy](#).

1.5. This policy operates in line with the Office for Students regulatory guidance related to freedom of speech and the University recognises that everyone has the right to freedom of expression.

2. SCOPE

2.1. This policy applies to incidents of harassment, bullying, and victimisation where the responding party is a student of the University. While the policy primarily addresses cases involving members of the University community as reporting parties or recipients of the behaviour, it may also extend to third-party reporting parties in cases where the conduct in question could be deemed detrimental to the interests and reputation of the University.

2.2. This Policy applies and procedures of other organisations may also apply, for example, if a student is on placement or studying at a partner institution, or where professional registration is applicable.

2.3. This policy also outlines steps that the University takes to reduce the likelihood of incidents of bullying, harassment (including sexual misconduct) and victimisation.

2.4. Where a student wishes to raise a report regarding a member of staff this can be done through the University's online [Report and Support platform](#), to Student Services or directly to Human Resources. Further information on raising concerns can be found at [Student Services webpage](#). Support can still be accessed regardless of the responding party being a staff member, a student at the University or any other persons.

2.5. In all cases, students and staff can obtain support from the university (see section 5).

3. POLICY

3.1. It is the responsibility of every member of the University community to ensure an inclusive and supportive work and study environment, promoting tolerance and respect towards Equity, Diversity and Inclusion.

3.2 The University is a diverse and welcoming community. We will treat everyone with dignity and respect and share in the collective responsibility for creating and sustaining an environment that upholds dignity for all.

3.3 The University is committed to fostering an environment where students and staff feel confident to report any incidents or forms of misconduct. In line with the Office for Students E6 Condition Harassment and Sexual Misconduct, Keele University have introduced a Single Source webpage to ensure all University information related to condition E6 is easily accessible.

3.4. The University recognises the importance of prevention activities, including education campaigns. The University will seek to deliver innovative campaigns and training which attract a wide and diverse audience, with the aim of examining and disrupting harmful cultural norms around sex and relationships. In line with the Office for Students condition E6, training is required by all students and staff, for more information on training, resources and campaigns please visit [Student Services](#).

4. UNIVERSITY COMMITMENTS AND EXPECTATIONS

4.1. We are committed to providing an environment in which all members of our community feel safe and are respected.

4.2. We are committed to providing a supportive environment where students and staff feel confident and empowered to disclose, will be listened to and understand the options available to them.

4.3. Deliver awareness raising campaigns to raise awareness of bullying, harassment and victimisation, ensuring students are aware of support and reporting routes.

4.4. Ensure students have access to support, ensuring those who are alleged to have breached University Policy are supported and treated fairly.

4.5. Students will be supported to report incidents of bullying, harassment and victimisation. This includes through external organisations such as the Police.

4.6. We will respect the right of the individual disclosing an instance to choose how to take forward a disclosure. In certain circumstances, such as when we have a legal duty to fulfil, we may disclose information to manage risk.

4.7. All reports will be carefully and thoughtfully addressed by staff members. For staff specifically involved in the subsequent process they will ensure that it is transparent and clearly communicated to all involved, adopt a trauma-informed and victim led approach and provide support to all students or staff involved in the process.

4.8. Everyone involved in an investigation will be treated fairly.

4.9. We will raise awareness of appropriate support and organisations to aid the recovery of students that have been affected.

4.10. We will provide students with the tools to speak up and address inappropriate behaviour where it is safe to do so by providing training such as active bystander training, accessible online resources and clear reporting channels.

4.11. We will actively work locally with external organisations to address misconduct.

5. SUPPORT

5.1. The University has a range of support in place to ensure students and staff can access the appropriate support based on their needs. [See Annex B - Internal and External Support information.](#)

6. REPORTING

6.1. All allegations of bullying, harassment or victimisation will be regarded as a serious matter and will be dealt with in a sensitive, objective manner, respecting the rights of all parties involved.

6.2. Where the [Report and Support Reporting Tool](#) has been used to report an incident (or where an anonymised method used to make a report e.g. pseudonymised email account), and where a student or staff member has chosen to provide contact details, the University will contact the reporting party to offer support and detail further reporting options.

6.3. Reporting incidents or concerns anonymously to the University is possible. However, without contact details, investigating further may be challenging as it is likely contact with the reporting party would be required to obtain evidence which is essential to facilitate a full and proper investigation. The University will keep identities confidential where possible, however, confidentiality cannot be maintained if an investigation is to be carried out, nor is it absolute as third parties such as the police may request details. Generally, anonymous reports won't lead to formal action unless there is compelling evidence to do so. Where contact details are not provided, the information reported will be used to assess trends and inform future priorities and activities, including areas where interventions may be appropriate and priorities for campaign work.

7. INVESTIGATIONS
7.1. Where possible and appropriate, the University will attempt to resolve reports informally. However, if an informal resolution does not resolve the situation, or if the report is of a nature that informal resolution is not appropriate, it may be necessary for the issue to be

passed to the University Discipline team for an investigation under [Regulation B1](#). This may result in disciplinary action outlined in the [Code of Practice for Non-Academic Student Discipline](#). Where the report concerns the behaviour of a staff member, the report will be passed to Human Resources for investigation under the appropriate Staff Disciplinary and Appeals Procedure. Further information can also be found in the Single Comprehensive Source of Information.

7.2. In exceptional circumstances, where a risk assessment concludes that there is a risk of harm to a child or adult at risk, and/or a serious risk of harm to the reporting party and/or the wider community, the University may report the incident to a relevant external authority, and/or take disciplinary action, even where the reporting party does not consent. Please see the University Safeguarding Policy and Privacy Notices for more information.

8. CONFIDENTIALITY

8.1 Confidentiality will be maintained, where possible, throughout the disclosure, reporting and investigative processes. As such, information will usually only be shared with relevant individuals/entities, who may be internal or external to the University, e.g. relevant University staff, counselling and mental health practitioners, witnesses, external experts from specialist agencies or the Police, with the agreement of the Reporting Party.

8.2 Throughout all proceedings, the University will act in compliance with the [General Data Protection Regulation \(GDPR\)](#) and [Data Protection Act 2018](#).

9. ROLES AND RESPONSIBILITIES

9.1 The University has a duty to all members of its community to ensure the health, safety and well-being of its students, staff and visitors. Where it is believed this policy has been breached, consideration of the law, University regulations and the context of the issue will be considered.

9.2 The Director of Student Support and Success and the Head of Student Discipline and Investigations are responsible for the reviewing and monitoring of this policy. Any questions regarding the policy should be addressed to the Head of Student Discipline Investigations or the Director of Student Support and Success.

10. RELATED POLICIES AND PROCEDURES

Relevant legislation:

- [Equality Act 2010](#)
- [Protection from Harassment Act 1997](#)
- [Human Rights Act 1998](#)
- [UK General Data Protection Regulation 2018 & Data Protection Act 2018](#)
- [Education Act \(Freedom of Speech\) 2023](#)
-

Relevant University Policies and Procedures:

- [Code of Practice for Student Non-Academic Misconduct](#)
- [Regulation B1 Student Discipline](#)
- [Equality, Diversity and Inclusion Strategy](#)
- [Freedom of Speech Code of Practice](#)

- [IT Acceptable Use Policy](#)
- [Safeguarding Policy](#)
- [Sexual Violence and Misconduct Policy](#)
- [Disciplinary and Appeals Procedure \(Staff\) - Keele University](#)
- [Disciplinary and Appeals Procedure for Academic Staff - Keele University](#)

11. REVIEW, APPROVAL & PUBLICATION

11.1 Monitoring of this policy and associated procedure will be undertaken by Student Services. It will be reviewed every three years submitted to the SVM and Harassment Working Group and the Student Voice Committee for approval together with any subsequent reviews.

11.2. The document will be published on Policy Zone and referenced on Keele University webpages related to bullying, harassment, behaviour and discipline as appropriate.

12. DOCUMENT CONTROL INFORMATION

Document Name	Bullying, Harassment and Victimisation Policy Statement for Students
Owner	Director of Student Support and Success
Version Number	1.2
Equality Analysis Form Submission Date	N/A
Approval Date	22 July 2025
Approved By	University Executive Committee
Date of Commencement	01 August 2025
Date of Last Review	22 July 2025
Date for Next Review	22 July 2028
Related University Policy Documents	Please see above
<i>For Office Use – Keywords for search function</i>	

Annex A - Definitions

What is Harassment, Bullying and Victimisation

Below is a list of examples of behaviour that may constitute bullying, harassment and victimisation. The list is not exhaustive; however, it is indicative of behaviour that would be considered unacceptable conduct by the University.

Harassment

The University adopts the definitions of harassment set out in:

- **Section 26 of the Equality Act 2010**
- **Section 1 of the Protection from Harassment Act 1997**

These definitions are interpreted and applied as follows:

Under the Equality Act 2010, harassment is -

Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

The relevant protected characteristics are:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation

Gender reassignment and Sex are the legal terms under in the Equality Act. In addition, we choose these to include gender identity or gender expression more widely as well as gender transition.

Importantly, harassment under the Equality Act can occur as a single incident—it does not need to be repeated behaviour. Harassment does not have to be intentional. The perception of the person subject to the conduct will be taken into account, along with other circumstances of the case and whether it is reasonable for the conduct to have had that effect on the individual.

Under the Protection from Harassment Act 1997, harassment is defined as a course of conduct (i.e. behaviour occurring on at least two occasions) that causes alarm or distress to another person. This

can involve repeated behaviour towards one individual, or separate acts directed at multiple individuals. A person commits an offence if they know—or a reasonable person would conclude—that their behaviour amounts to harassment.

The University extends these definitions to include harassment by one student towards another.

Both Acts include objective tests to determine whether conduct amounts to harassment. When assessing allegations, the University will consider:

- The perception of the person subjected to the behaviour
- The context and circumstances of the case
- Whether it is reasonable for the conduct to have the effect being considered

Bullying is classed as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient. It can also be an abuse of personal or collective power or a position of authority, in an aggressive or subtle way, which makes the recipient feel upset, threatened, intimidated, humiliated or vulnerable and undermines their self-confidence.

An allegation in relation to bullying is described as, repeated, unwelcomed, unwarranted behaviour which causes a detrimental effect on a person's wellbeing. The behaviour may involve repeated forms of unwanted and unwarranted conduct, but a one-off incident can also amount to bullying and harassment.

Cyber and Electronic bullying: Cyberbullying is bullying that takes place using digital devices and can occur through text, apps, social media, message forums, emails, livestreams and messaging. It can include sending, posting, or sharing negative, harmful, and/or false content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation.

Victimisation occurs when an individual is treated less favourably or subjects them to a detriment because they have made, or intend to make, a complaint of discrimination (including harassment and/or bullying) or have helped another person to make a complaint. Victimisation can constitute unlawful discrimination.

Further information on bullying, harassment and victimisation is located on the Student Services website [here](#). The following examples are not mutually exclusive and can occur in one or many of the behaviours listed below:

Examples of harassment

A course of conduct that harasses one other person, or a course of conduct that harasses two or more persons at least once each by:

- spoken or written words or abuse including threats, derogatory name calling, insults, ridicule or belittling, maliciously spreading rumours or lies.
- offensive emails, tweets or comments on social networking sites such as intimidating or aggressive behaviour, images and graffiti.
- physical contact or gestures, offensive or threatening comments or content posting comments/photos etc.
- facial expressions, jokes or deliberately mocking an individual with the intent to harass or humiliate.
- intrusion by pestering, spying or stalking.
- sexual or physical abuse or assault, sexual advances or innuendo (see Sexual Violence and Misconduct Policy and Procedure).
- coercion, such as pressure to subscribe to a particular political or religious belief or requiring a person to perform a humiliating or dangerous 'initiation ceremony' to join a social group.

Examples of bullying:

- psychological intimidation, humiliation, excessive and/or unreasonable criticism or fault-finding of any colleague, member of staff or peer.
- preventing an individual or intentionally blocking information to unjustifiably restrict an individual's opportunities.
- asserting a position of superiority in an aggressive, abusive or offensive manner whether orally or in writing, publicly or in private.

Examples of victimisation:

- an action of singling an individual who has complained about a discriminatory act.
- preventing and/or intentionally preventing an individual from accessing opportunities or resources.
- treating an individual less favourably because of their actions.

Annex B Internal and External Support Information

Internal Advice and Support

- [Ability to report through a dedicated platform, Report and Support](#)
- [Student Experience and Support Officers Student experience and support - Keele University](#)
- [Residence Life Team Residence Life - Keele University](#)
- [Sexual Violence Liaison Officers Sexual violence and domestic abuse - Keele University](#)
- [Domestic Abuse Liaison Officers Domestic abuse - Keele University](#)
- [Advice and Support and Keele \(Keele Students' union\) Advice & Support at Keele SU \(ASK\)](#)
- [Reciprocal agreement with the University of Staffordshire Students' Union Reciprocal-Agreement.pdf](#)
- [Counselling and mental health - Keele University](#)
- [Student Assistance Programme Health Assured - Keele University](#)

External Advice and Support

(This list comprises representative examples of external support and should not be considered exhaustive)

- [New Era \(Staffordshire and Stoke on Trent\) - Victim Support](#)
- [Anti-Bullying Alliance](#)
- [Cyberbullying | Bullying online advice](#)
- [Equality Advisory Service](#)
- [Homophobic, Transphobic, Racial, Religious & Disability Hate Crime - True Vision](#)
- [Sexual Violence and Abuse Support - Staffordshire Women's Aid](#)
- [Sexual Violence and Abuse Support - Savana](#)
- [Domestic abuse support – Newcastle-under-Lyme Borough Council](#)
- [VS - Victim Support](#)
- [Staffordshire Victims Gateway](#)