

Information for Students reporting Harassment or Sexual Misconduct

(where the alleged perpetrator is a staff member)

Human Resources

1 August 2025

1. Introduction

This guide provides key information about reports of harassment and/or sexual misconduct of a student and where the complaint is against a member of staff at Keele University. It is intended to ensure students are aware of reporting and support routes, as well as comply with requirements under [Condition E6: Harassment and sexual misconduct - Office for Students](#).

In circumstances where the subject of the complaint is a student, the procedure to be followed is as outlined in the Never OK Hub (www.keele.ac.uk/sv).

As a student of the University we have teams of staff who can provide guidance and support. Please do get in touch with our teams if you have any questions or support requirements. Further information can also be found in the policy links below.

Further information on the content of this guidance, information on procedural options and reporting options, or if you wish to make a complaint concerning a staff member, can be obtained through making a report and providing contact details on University's online Report and Support platform (<https://reportandsupport.keele.ac.uk/>), from Student Support on 01782 734481 or student.services@keele.ac.uk, or Human Resources at hr.support@keele.ac.uk or 01782 731816.

Any complaints of harassment or sexual misconduct made against a staff member will be handled with due regard and sensitivity. The standards of behaviour and expectations of staff members are outlined in the University's values and behaviours framework and policies listed below.

- [Sexual Violence and Misconduct Policy](#)
- [Personal Relationships Policy and Procedure](#)
- [Dignity and Respect Policy and Procedure](#)
- [Disciplinary and Appeals Procedure for Academic Staff](#)
- [Disciplinary and Appeals Procedure for Staff](#)

Support may be provided to students through the University's Student Services [SVLO - Keele University](#) team, but any formal complaint concerning a staff member will be handled by Human Resources and in accordance with University policies and procedures, Condition of Registration E6: Harassment and Sexual Misconduct (Office for Students) and Employment Law.

2. Scope

This guidance applies in relation to complaints of harassment and/ or sexual misconduct where the subject is (or was at the time of the incident(s)) a registered student of Keele University and

the alleged perpetrator is a staff member and may be regarded as representing the University at the time of the incident(s).

The University maintains responsibility for all students registered with the University and studying towards a Keele University award, regardless of their location of study in the UK or overseas.

All staff members are required to conduct their roles with professionalism and integrity. The University is committed to the fair and equitable treatment of all students regardless of protected characteristics. Staff members are periodically made aware of the information contained within the single source (upon appointment and through annual university communications) and appropriate training will be provided.

Where a formal complaint is made of harassment and/ or sexual misconduct of a student(s) against a staff member(s) it will be investigated in accordance with the appropriate University Staff Disciplinary and Appeals Procedure in place at the time that the complaint is received where appropriate. However, the standards of behaviour expected of the University, support and training in place etc will be considered as at the time the alleged incident occurred and the laws in place at that time.

The following definitions may be used:

- Students – includes, but is not limited to, persons who are registered on a higher education course and, at any point in time within the overall duration of that higher education course, are employed by, or otherwise providing services to, a higher education provider.
- Staff – includes but is not limited to employees and contractors.
- Reporting party – the person(s) who has made a formal complaint regarding harassment and/ or sexual misconduct
- Responding party – the employee named in a formal complaint who is alleged to have committed an act of harassment and/ or sexual misconduct.

3. Support

Student Services and the Sexual Violence Liaison Officer (SVLO) can support you with a range of support needs regardless of whether you wish to make a formal report about an incident and/or the outcome of any stage of a complaint and will continue even if a complaint is not upheld. Further information is available [here](#). This may include details as to relevant academic support, such as processes for extenuating circumstances or support with assessment.

Complaints can be raised via the University Report and Support platform (<https://reportandsupport.keele.ac.uk/>), Student Services on 01782 734481 or student.services@keele.ac.uk, or directly to Human Resources at hr.support@keele.ac.uk or 01782 731816. Students are encouraged to engage with student services to ensure appropriate welfare support can be offered, as appropriate, to support both the individual and continued academic engagement.

Support will be provided to staff members against whom an allegation is made. This will be a separate internal provision through their line manager, Human Resources team, access to Occupational Health and/ or Employee Assistance Programme.

4. Staff training

The University will ensure that staff are aware of and appropriately knowledgeable of the single comprehensive source of information.

Through Student Services the University provides disclosure training to those staff members identified as likely to receive disclosures about incidents of harassment and/or sexual misconduct. This includes relevant members of the Human Resources team.

Investigating officers and disciplinary panel chairs are carefully selected, trained and supported to handle matters of this nature. Those individuals involved in investigations and/ or decision makers in relation to formal complaints will receive appropriate investigation training consisting of either a face-to-face training session or online module which has been designed by credible professionals in this area. Additionally, managers will be supported in their role by experienced HR professionals and/or University representatives. The training content focuses on the necessary skills to carry out processes and a detailed review of the relevant policies and procedures.

All training offered will be reviewed periodically and effectiveness evaluated. The design, development and review of the offer will be underpinned by credible evidence gathered and will be designed and delivered by professionals with credible and demonstrable expertise.

5. Definitions

In accordance with the Office for Students Condition E6, harassment has the meaning given in section 26 of the [Equality Act 2010](#) and section 1 of the [Protection from Harassment Act 1997](#) and as summarised below.

Harassment, is defined by the Equality Act 2010 as unwanted conduct relating to a relevant protected characteristic, which has the purpose or effect of violating a person'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.

Harassment is also defined as a course of conduct conducted on at least two occasions that harasses one other person, or a course of conduct that harasses two or more persons at least once each.

These definitions of harassment also extend to include **harassment** of one individual by another individual. When assessing whether harassment has occurred, the University will consider:

- the perception of the person who is at the receiving end of the conduct
- the other circumstances of the case
- whether it is reasonable for the conduct to have the effect under scrutiny
- if the person knows the conduct amounts to harassment of the other, or
- if a reasonable person in possession of the same information would think the course of conduct amounted to harassment of the other person.

Sexual misconduct means any unwanted or attempted unwanted conduct of a sexual nature which occurred in person or by letter, telephone, text, email or other electronic means and/or social media and includes, but is not limited to:

- a. sexual harassment.
- b. sexual assault; and
- c. rape.

Further information and examples can be found in the Sexual Violence and Misconduct Policy Statement and Bullying, Harassment and Victimisation Policy Statement for Students.

Nothing in this guidance or policies outlined should be interpreted as undermining or compromising the University's commitment to freedom of expression as stated in [Freedom-of-Expression-Code-of-Practice-Aug22.pdf](#). This code enables staff to be free to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs and privileges they may have at the University. The University supports a culture of professionalism and that debate and expression of views on topics which some may find disagreeable is conducted in a way which is considerate to the views and impact on others which respects the University's Values and Behaviours Framework.

It is unlikely that students being exposed to any of the following would amount to harassment:

- the content of higher education course materials, including but not limited to books, videos, sound recording and pictures;
- statements made and views expressed by a person as part of teaching research or discussions about any subject matter which is connected with the content of a higher education course.

6. Confidentiality

Information received or obtained by the University will be handled sensitively and used fairly for the purposes of supporting parties and/ or taking appropriate action to investigate and address concerns. Information will not be disclosed to others unless there is robust and justifiable reason.

Any staff member who becomes privy to information of this nature must handle it sensitively. The following general principles will be followed:

- Information will be collected sensitively and treated with appropriate confidentiality regardless as to how it is collected i.e. via Report and Support, direct to Human Resources, via student services, in person etc. Information will only be disclosed to others where there is a robust and justifiable reason. Where a formal investigation is commenced sufficient information will need to be provided to others involved in the process, including the person against whom the complaint is made. The Investigating Officer and/or member of the Human Resources team can provide further detail relating to individual cases. Should any matter under investigation be progressed to a formal hearing, the individual(s) under investigation will receive copies of any statements taken as part of an investigation.
- The University will comply with data protection in the handling and storage of information.

It is expected that all parties involved in a report or subsequent investigation will be sensitive to the nature of such proceedings, including matters discussed and any evidence provided. A breach of confidentiality may compromise the integrity of the procedure. This does not preclude individuals from seeking appropriate advice, support and information in relation to the case.

In exceptional circumstances, where an assessment of risk 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 the relevant external authority, and/ or take disciplinary action against the alleged perpetrator, even when the reporting party does not consent. Please see the University [Safeguarding Policy](#) and [Safeguarding Procedure](#).

7. Reporting Options

Students, witnesses and other persons wishing to report behaviour of a member of staff of the University that may amount to harassment and/ or sexual misconduct of a student can do so in the ways outlined below. These reporting routes may also be used where it is believed there has been a breach of the Personal Relationships Policy Statement and Procedure for Disclosing Relationships or to Raise Concerns (Staff & Student Relationships) or if students have any questions or queries in relation to support offered or processes that may be instigated.

- Ideally reports should be made via the University's Report and Support platform (<https://reportandsupport.keele.ac.uk/>) and contact details provided. Alternatively reports via the online Report and Support platform can be made anonymously. Where a report is made and contact details provided, the University will contact the reporting party to offer support and discuss reporting options. Further information on the platform, including how reports will be addressed can be found here (<https://reportandsupport.keele.ac.uk/>).
- Report to student services for advice and guidance on 01782 734481 or student.services@keele.ac.uk.
- Contact Human Resources via email hr.support@keele.ac.uk or phone 01782 731816. Where appropriate meetings via MS teams or in person can be arranged. Email and phone calls will be responded to as soon as possible and normally within 48 hours Monday – Friday 9am – 5pm, excluding University closure days. Please note that outside of these hours emergency support can be provided via Campus Safety on 01782 733999.

Where a person chooses to disclose an instance of harassment or sexual misconduct anonymously via the University's online Report and Support platform, information received can be investigated however action will be limited due to the anonymity of the report. Anonymised information will help the University understand patterns in behaviour, assess trends and inform priorities and activities, including areas where interventions may be appropriate.

It is important to note that a disclosure or report does not create a formal complaint and it is not an instruction for the University to take action. The person who has disclosed will have the opportunity to be heard and consider options before proceeding with any further steps. Where a disclosure is made to a SVLO they will ask the complainant if they wish to make a formal complaint to the University and proceed with a formal investigation. In such instances, with the individual's permission, the SVLO will contact a member of the Human Resources Team.

The University reserves the right to investigate any allegations made against a staff member if it is felt there is a risk to the University or members of our community. In some circumstances this

may include carrying out an investigation with or without the reporting party's cooperation however, all attempts will be made to secure the reporting party's agreement.

Confidentiality will be maintained, wherever possible, throughout any disclosure, reporting, investigatory and disciplinary procedures. As such, information will usually only be shared with relevant individuals. Confidentiality cannot be maintained if an investigation is to be carried out as information may need to be shared with the alleged perpetrator and witnesses.

Students may also consider reporting the incident(s) to the police if they so wish. A report to the police can be made regardless of whether the matter has been raised with the University. Where a matter is reported to the police which results, or is expected to result, in a criminal investigation, it is likely that the University may need to suspend any internal investigation until any criminal case is concluded. In such circumstances the internal University process would be suspended until the criminal investigation is concluded. Please be assured that in such circumstances support from the University will continue to be provided during any period of suspension. The student would be notified of progress wherever possible. The University would always seek to comply with a police investigation and not prejudice a police investigation.

It is normally the student's decision if they wish to inform the police and the University will not influence the decision. However, there may be circumstance where it is necessary to inform the police because there is ongoing risk to their safety or the safety of others, a risk to those who are vulnerable, or a safeguarding concern.

Further information on how a matter could be reported to the police and support the University can provide upon request can be found here (www.keele.ac.uk/sv) the rest of this guidance focuses on options for reporting internally and what to expect.

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

7.1 Formal Report to the University of Harassment and/ or Sexual Misconduct against a student by a staff member

Where a student, witness or other party wishes to make a formal complaint they should contact the University Employee Relations Team based in Human Resources through the contact routes identified above. The matter will proceed in accordance with the appropriate disciplinary policy. For avoidance of doubt the outline process is given below. Where a report is made anonymously, due consideration will be given but the available actions will be limited.

Where a report is made and reporting party provides contact details, a member of Human Resources will review the content of the report and engage with the reported (the person party's line manager or appropriate other senior representative of the University in order to determine if there is sufficient information and the threshold of complaint is met. Where there is insufficient information, contact will be made with the reporting party for further information. If there is insufficient information or it is determined that there is no case for the staff member to answer, the reporting student will be notified and an explanation provided.

In determining if the threshold for complaint is made, due consideration will be given to the information provided and nature of allegation made. Where it is considered that the matter may amount to harassment and/ or sexual misconduct, an investigatory process will be commenced.

The University will assess for any potential support, safeguarding needs or temporary measures to be imposed on the responding party whilst an investigation is conducted. If during the course of an investigation the complainant believes that a temporary restriction has been breached or if there is further incident(s) the investigating officer should be informed. Additionally, if the student feels at risk or unsafe they may contact the Campus Safety Team for immediate support.

Any temporary measures will be kept under review throughout any investigatory phase and disciplinary process.

8. Investigation

In most cases it is likely that a full investigation will be required. An investigating officer would be assigned to the case. They would be an independent representative of the University with sufficient seniority and training to undertake the role of investigating officer. A named member of the Human Resources team would also be assigned to the case to provide support and advice.

The investigating officer will determine the allegations to be investigated, drawn from the detail of the complaint and the reported staff member will be informed of the allegation(s) and investigation. The investigating officer will review the content of the complaint and determine the scope of the investigation and how information can be gathered to investigate the complaint and this will be informed by the complexity of the case. This may involve speaking with individuals and reviewing evidence sources for example, CCTV, where available and appropriate. An internal investigation will focus on whether a breach of university policy, condition E6 or the Single comprehensive source of information has occurred and would not be a criminal investigation nor would it consider legal definitions and burden of proof.

It is important that investigations undertaken and decisions made in respect of incidents of harassment and/ or sexual misconduct are credible, fair and follow principles of natural justice. To this end they will be conducted with transparency, fairness and impartiality. An investigating officer or hearing manager will be asked at the outset of their involvement in a case to state if they could be perceived as having any actual or perceived conflict of interest through any prior involvement in aspects of the case.

It is likely that the investigating officer will wish to speak to the reporting party early in this process in order to ensure they understand the complaint in full and gather information about the reported incident(s). The HR representative would also be present at any such meeting. Notes of the meeting would be taken and these would form a formal record of the case and depending on the outcome of the investigation, may be used as part of any formal process and shared with the reported party. The individual will have advance sight of the notes of their meeting and provided opportunity to check for accuracy. During any formal meetings of this nature the student can be accompanied by a member of the Keele community who has not been witness to the reported behaviour. Please be assured that such meetings would be approached sensitively and students will be supported as necessary throughout.

At any stage during the process, individuals may request reasonable adjustments to be made to enable full participation in the process.

From information received the investigating officer will determine what further enquiry is appropriate. This may include, but not be limited to, speaking to witnesses to the alleged event,

reviewing any evidence provided and also speaking with the reported party. All meetings will be formal with a written record of the discussion which will be used as part of the formal report. Witnesses can be accompanied at meetings by a member of the Keele community who has not been witness to the reported behaviour and staff members by a Trade Union representative or a workplace colleague.

The investigating officer won't necessarily meet with all witnesses but a sample, where it is felt that they may have material relevant to the case.

Through this process, the investigating officer will seek to test information presented and accounts given and that any discrepancies or gaps in information are addressed wherever possible.

Investigatory meetings will usually be held in person or via MS teams, however written questions or other means will be considered, where appropriate to the circumstances.

The investigating officer will share information relating to the complaint with the reported party, as they must understand what they have been accused of and be able to respond fully. It is important to note that in comparison to a police investigation, an internal investigation of this nature is limited in its authority and tools available to gather evidence. For example, the Investigating Officer cannot compel witnesses to engage with the process and is unable to gather forensic evidence to support an investigation.

The following key principles will apply:

- the subject of an allegation will be informed of allegations made against them and the process that will be followed, in a timely manner and with sufficient detail to allow for preparation of a response.
- Detailed records will be made of the investigation, including witness statements. The reported party will be able to review the investigation notes prior to submission.
- The reporting party will be provided with an opportunity to share full details of the allegations as part of the investigatory process. It is acknowledged that this may be a difficult time and all reasonable adjustments and support will be provided, where possible, to enable the reporting party to participate in the process.
- Prior to any disciplinary hearing the reported party will be provided with a copy of all evidence the University is relying upon. This will include statements taken by the reporting party, witnesses and any other evidence. The reported party will have the opportunity to present their case and provide evidence and responds to the allegations.
- Consistency in application will be achieved through developing a trained pool of investigators and hearing managers
- Cases will not be pre-judged and no decision will be reached until adequate investigation has been completed and the reported party has been provided with an opportunity to discuss the issues and explain their position. Decision makers will provide clear and reasoned explanations for any decisions made, including reasons for any disciplinary sanctions imposed.
- The reported party will be provided with an opportunity to appeal against any sanctions imposed.
- Parties will be afforded the right to representation. For students this may be a member of the Keele community who has not been witness to the reported behaviour and staff members by a Trade Union representative or a workplace colleague.

Once all available and reasonable information has been collected, a report will be compiled, detailing the allegation, investigation completed, findings of the investigation and present the relevant information gathered, including statements taken throughout the investigation. This will recommend whether there is a prima facie case. This will be submitted to and reviewed by an independent manager who will decide if there is:

- a prima facie case and in such instances a disciplinary hearing will be convened as outlined below.
- No case to answer, with or without recommended actions.

Where it is determined that there is no case to answer, the investigating officer or other representative will inform both the reporting party and reported party of the outcome and the reasons for it. Whilst full details cannot always be provided, consideration will be given to the level of detail that may be shared to provide full assurance that a full and thorough process has been followed.

9. Decision making principles

When considering a case the investigating officer and receiving manager will act fairly and reasonably and in an objective manner. When considering the findings of an investigation there is no requirement for the University to use a criminal standard of proof in its internal investigation. Any judgements reached as part of the investigation and any subsequent disciplinary do not constitute a legal ruling on whether or not criminal activity has taken place. The investigation and hearing manager will consider all relevant information and will seek to prove and disprove the allegation(s) in equal measure. Investigating officers and the hearing manager (where applicable) considering an allegation must decide on the “balance of probabilities” whether the alleged misconduct is more likely to have occurred than not based on the evidence presented. The burden of proof that an allegation (or part of) is upheld rests with the University.

Where there is little evidence available other than each party’s accounts, and the case is ‘one word against another,’ it can be difficult for an allegation to be upheld and it may be that no formal action is taken, but consideration may be given to any training, or awareness raising with the staff member concerned, or wider teams. This does not mean that the reporting student is not believed. In these situations, it can simply be that the accounts provided by all parties appear credible, and there is no evidence that supports either account being more likely to have occurred than the other.

In deciding whether the alleged conduct has the effect of violating a person’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment towards that person, the perception of the person who was at the receiving end of the conduct; the other circumstances of the case; and whether it is reasonable for the conduct to have had that effect will be taken into account.

For an offence to be considered one of harassment, the person committing the act would have to know the conduct amounts to harassment of the other, or a reasonable person in possession of the same information would think the course of conduct amounted to harassment of the other person.

The investigating officer (or in some instances the receiving manager) will contact the reporting student and advise on the decision taken and next steps. Where there is no prima facie case, information will be shared to explain the basis on which such a decision has been reached. Due to confidentiality and GDPR considerations there may be some limitation on the extent of information that may be provided, but sufficient information will be shared to enable understanding of the decision reached. The accused party will also be contacted in writing and informed of the outcome of that stage.

10. Disciplinary Meeting

If there is a prima facie case to answer a formal disciplinary hearing will be convened in accordance with the relevant University Staff Disciplinary and Appeals Policy. The hearing will be held either on MS teams or in person. Prior to any formal hearing the reported party will be provided with a copy of the investigation report and all appended information, which will include full details of the report and statements collected by the investigating manager during the course of the investigation. This is essential in order that the staff member understands the allegations made and can respond accordingly.

The matter will be heard by an independent manager of the University and they will be supported by a member of the HR team.

At the hearing the investigating officer will present the case and the reported party will be provided with an opportunity to respond. Witnesses may be called to the hearing to present evidence, by either the investigating officer, hearing manager, or staff member. Any witnesses will be notified in advance and be provided with details of what to expect. It is of course noted that this may be a difficult situation and should students not wish to attend as a witness, alternative options will be explored. Any student witnesses will be able to be accompanied by a member of the Keele Community (a current member of staff or current student). Any accompanying person will not normally have had any involvement in the case or a witness to the case and all witnesses are expected to speak on their own behalf. All witnesses and reporting parties are required to provide a true and honest account and response to questions posed. False testimony may constitute misconduct. The reporting student will not always be required to attend and would not be compelled to attend.

Following presentation of the case and consideration of all available information, the hearing manager will determine the outcome in accordance with University policy. The reported party will be informed following the formal meeting of the outcome in writing. This should contain the decisions reached and reasons for them.

The range of possible outcomes of a formal disciplinary meeting are documented in the University's Staff Disciplinary and Appeals Procedures.

Should a disciplinary sanction be imposed, the staff member has a period of 10 working days to appeal against that decision. If there is no formal outcome of the hearing, or once this timescale has lapsed, the reporting student will be notified of the outcome of this stage, including if any restrictions have been lifted.

11. Outcome

Following conclusion of the investigation and subsequent disciplinary hearing, as appropriate, the reporting party will be informed if their complaint has been upheld or not. Information will be shared with the reporting party to minimise any adverse effects of not knowing the outcome of the matter and likely future interactions with the reported party. There may be limits to the information the University is able to share. The reporting party will be asked to respect the confidentiality with regards to the outcome details.

It is the responsibility of the decision maker to consider, in addition to the individual against whom a complaint is made and the reporting party, if there are others affected by the decisions that need to be identified. This will be according to the matter considered and may include others in the management line, those whose practices may be impacted by recommendations made and/ or witnesses. Individuals informed and information shared will be restricted and shared purely on an essential and need to know basis. Feedback will be shared in a timely manner and ordinarily within a two-week period of the relevant decision being reached.

It is the decision of the investigating officer or hearing manager, depending upon the nature and content of the case, if any of the witnesses will be directly affected by the decisions made in respect of incidents of harassment and/ or sexual conduct. In such instances they will be informed of the decisions and the reasons for them.

Wherever possible, the University will complete its procedures in full. However, if a responding party leaves the University's employment, there are limitations to the actions that the University can take, and it may not be possible to achieve a case outcome. The University will aim to take appropriate measures where feasible.

12. Appeal Mechanism/ Dissatisfaction with university decisions.

There is no appeal mechanism if the reporting student is dissatisfied with the outcome of the investigation or disciplinary hearing. Where following receipt of feedback from the Investigating officer or hearing manager, the student remains concerned, these concerns should be raised with Student support.

13. Timeframes

The University aims to complete an investigation within 90 days (this includes the time for an appeal), but unfortunately these cases can often take longer. There are many reasons for this, one being the sensitive nature and complexity of investigations of this nature, absence of reporting or reported party or key witnesses. Time is taken to allow for any involved parties (including witnesses) to provide statements/interviews, as well as being able to access any support needed.

The reporting student will receive regular updates from the investigating officer and any expected or unexpected delays will be communicated to the reporting student.

14. Previous Versions

Further to the launch of the comprehensive single source of information on 1 August 2025, should any changes be made to the contents historical versions will be made available upon request.

15. Glossary

Reporting party means the complainant.

Reported party means the person who is the subject of the complaint