

Supporting students at Norland: Preventing and responding to harassment and sexual misconduct

Norland is committed to fostering a safe environment where all students can thrive. Harassment and sexual misconduct will not be tolerated.

This page is Norland's Single Comprehensive Source of Information, published in line with the Office for Students' Condition of Registration E6. It sets out Norland's approach to preventing and responding to harassment and sexual misconduct involving students, which brings together policies, procedures, guidance and key information relevant to both students and staff.

Scope of the guidance and who it applies to

This page provides information about how Norland works to prevent incidents through training and awareness, including guidance on behaviour that constitute harassment and sexual misconduct. It explains reporting routes for incidents involving a student or a member of Norland staff and sets out the procedures that follow a report. The page also outlines available support services, Norland's policy concerning staff-student relationships, and how Norland balances its responsibilities to protect freedom of speech and academic freedom while fostering a safe and respectful environment for all.

This guidance applies to all students studying at Norland.

Key policies and procedures

The Norland Code of Professional Responsibilities

[The Code](#) sets out the expectations and professional standards that Norland students must uphold. The values and principles set out in the Code underpin the behaviours and competencies expected of all students studying at Norland. Upon joining Norland, students commit to upholding these standards. There is recourse for Norland to take disciplinary action if students fail to uphold the Code.

Cause for Action Procedure

The Cause for Action Procedure is an initial process is usually taken when a concern has been raised. It aims to take swift and appropriate action to resolve minor concerns, and triage concerns so that they are dealt with under the most appropriate policy or procedure.

Student Disciplinary Procedure (non-academic)

The [Student Disciplinary Procedure](#) comprehensively outlines how Norland applies its disciplinary rules to student behaviour. It includes information about the formal process for handling reports of student misconduct, precautionary measures that may apply and the possible outcomes and sanctions.

Prevention of Harassment and Sexual Misconduct Policy

The Prevention of Harassment and Sexual Misconduct Policy outlines how Norland will respond to disclosures and formal reports of harassment and sexual misconduct against a student or member of staff. It includes how investigations, panel hearings and appeals will be carried out. It should be read in conjunction with the [Student Disciplinary Procedure](#) and Staff Disciplinary Procedure.

Personal Relationships between Staff and Students Policy

The Personal Relationships between Staff and Students Policy provides guidance on intimate and close personal relationships between staff and students. This policy strongly discourages staff from entering into an intimate relationship with any student for whom they have a professional responsibility. It also strongly discourages other close personal relationships. Norland requires such relationships to be declared, so they can be appropriately managed to protect student welfare.

Code of Practice on Freedom of Speech

The [Code of Practice on Freedom of Speech](#) outlines Norland's commitment to freedom of speech within the law whilst recognising Norland's responsibility to protect students and staff from harassment.

Definitions and key terms

Sexual misconduct is any unwanted or attempted unwanted conduct of a sexual nature including physical and/ or non-physical behaviours. It is characterised by a lack of consent, meaning the behaviour is unwelcome and the individual does not agree to it, either verbally or non-verbally. It extends to include online conduct.

Harassment as per the Equality Act 2010, is unwanted conduct related to a protected characteristic (like race, gender, or disability) that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. It can also be defined as conduct that causes alarm or distress. This can include a range of behaviours, from verbal abuse to physical intimidation, that violates a person's dignity or creates a hostile environment. It can occur in various settings, including the workplace and public spaces.

The Protection from Harassment Act 1997 provides a broader definition of harassment which covers any course of conduct causing distress or alarm, without requiring a protected characteristic to be involved.

Examples of harassment and sexual misconduct can include:

- **Jokes, gestures or derogatory comments** of a sexual nature.
- **Invading someone's space**, for example, standing unnecessarily too close to them.
- **Inappropriate body language**, for example, looking or staring at them in a way that feels uncomfortable or threatening.

- **Non-consensual sexual act** is engaging or attempting to engage in a sexual act with another person without their consent.
- **Non-consensual sexual contact** is sexually touching another person without consent.
- **Sexual assault** is any sexual touching that a person does not consent to. It involves all unwanted sexual contact including kissing, groping, sex without consent and enforced sexual acts.
- **Sexual violence** is any act of a sexual nature that a person did not consent to.
- **Stealthing** is the removal of a condom without consent.
- **Spiking** is plying another person's drink, food or similar item, with drugs or alcohol, to which they did not consent.
- **Cyberstalking** is the repeated and deliberate use of the internet and other electronic communication tools to engage in persistent, unwanted communication intending to frighten, intimidate or harass someone, or to spy on someone.
- **Image-based sexual abuse** is the recording or sharing of sexual or intimate photos or videos, without the consent of the person pictured. Also known as revenge pornography.
- **Sextortion** is threatening to publish sexual information, photos or videos about someone. Photos or recordings are often made without the person realising or consenting.
- **Stalking** is the persistent, unwanted communications or behaviour intending to frighten, intimidate or harass someone such as repeatedly following them.
- **Upskirting** is the filming or photographing under a person's clothes without their consent to capture images of their body or underwear.
- **Relationship abuse** is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those who are, or have been, intimate partners; this may include psychological, physical, sexual, financial and/or emotional abuse.
- **Honour-based abuse** is an incident involving violence, threats of violence or harm, intimidation, coercion, or abuse (including psychological, physical, sexual, financial or emotional) abuse) which has or may have been committed to protect or defend the

honour of an individual, family and/or community for alleged or perceived breaches of the family and/or community's code of behaviour.

These definitions include the application of objective and reasonableness tests.

Consent means that someone consents to sexual activity only if s/he agrees by choice to that activity and has the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs (Sexual Offences Act 2003, section 74).

Freedom to consent means that a person must not fear the result of not consenting. A person is not free to choose if, for example, they are being threatened or they could perceive they are being threatened, if their studies and assessments could be affected, if their future career could be affected or a power imbalance means they are being pressurised to commence or continue a relationship. Norland takes the position that where there is an imbalance of power it is unlikely that consent can be freely given out of choice.

Capacity to consent means that a person must have the mental and physical capacity to consent. This can be a one off or an ongoing situation. For example, capacity to consent may be affected by the influence of drugs or alcohol or the presence of a cognitive or learning difficulty, or a mental health condition. Staff also need to be aware that a personal intimate relationship with a student under the age of 18 is covered in the Sexual Offences Act (2003).

Objective test ensures fairness and consistency in legal decision-making by providing a standard that is not based on individual biases or subjective beliefs. When deciding whether conduct has the effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment towards that person, it is necessary to take into account (Equality Act 2010, section 26):

- 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 that effect. This is important because it introduces an element of objectivity into the test. The perception of the person who is at the receiving end of the conduct is not the only relevant consideration in determining whether the conduct amounts to unlawful harassment. Norland will provide support to students who report harassment and sexual misconduct regardless of whether Norland considers that the incident meets the objective test.

Reasonableness test evaluates whether a decision or action is fair, sensible and within a range of acceptable outcomes. Factors such as circumstances, potential consequences and available options may be considered.

An offence is committed only if the person knows 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 (Protection from Harassment Act 1997, section 1).

Complicity is any act that knowingly helps, promotes or encourages any form of sexual misconduct by another person.

Retaliation is any adverse actions against another person, including, but not limited to, harassment, threats, intimidation or coercion, made in response to someone disclosing or reporting any forms of sexual misconduct.

Incidents include, but are not limited to, circumstances where:

- allegations or complaints are made to Norland about harassment and/or sexual misconduct; and
- Norland could reasonably be considered to have grounds for suspecting that harassment and/or sexual misconduct has taken place or is taking place.
- Allegations or complaints made by a Norland student against another Norland student, a group of Norland students, a member of Norland staff or a Director.

Reporting party refers to the person who discloses and then formally reports and allegation of sexual misconduct against another student or a member of staff.

Reported party refers to the person who is the subject of a formal report alleging they have committed sexual misconduct.

Investigation is a formal process where an investigating officer (a trained member of staff) gathers information to ascertain the facts of an alleged harassment or sexual misconduct issue. It is a fact-finding exercise which usually involves taking statements from witnesses, including the reporting and reported individuals and gathering relevant evidence to recommend a way forward, for example invoking the disciplinary procedure. The primary aim of an investigation is to be fair and consistent by basing recommendations on evidence rather than assumptions.

Staff a person who has been employed by Norland College to carry out a specific role within the college. They may be permanent or fixed term, part or full-time, work remotely or on campus. This also applies to any director, trustee or a contractor appointed on a Service Level Agreement.

Student an individual who has registered and enrolled onto a programme of study at Norland and is formally engaged with learning regardless of whether they study on campus, off campus or online.

Confidentiality in the context of harassment and sexual misconduct reports, means that information shared about an incident will only be disclosed to a limited group of individuals who need to know for the purpose of investigation and resolution, and with the express permission of the reporting individual, unless there are serious safety concerns. It is about protecting the privacy of those involved while still ensuring appropriate action is taken. Norland reserves the right to escalate a report if there are serious concerns about safeguarding and/or a risk to the wider student community.

Abuse of power means a situation where a relevant staff member exploits a position of power in relation to a student so as to apply pressure in a way which:

- i. May result in the student doing something, or refraining from doing something, that they may not have otherwise done; and
- ii. That action or inaction could reasonably result in something that falls within the scope of an intimate personal relationship.

(Definition taken from Office for Students, Annex A: Condition E6, section E6.11)

Intimate personal relationships - with the exception of excluded relationships, including marital, life partner, physical, sexual (either isolated or repeated), emotional and romantic, regardless of gender, gender identity or sexual orientation, and which is consensual. It is strongly recommended that any relevant staff member does not engage with or form an intimate personal relationship with one or more students.

Close personal relationship - a relationship with a relative, close family friend, close friend or a relationship where there is a financial dependence.

Excluded relationships refers to any ongoing intimate personal relationship that either existed before 1 August 2025 (date the E6 condition came into force) and that remains in existence or existed before the date that the member of staff became a relevant staff member in relation to that student.

Where such relationships exist, it is important that this is disclosed to the HR department immediately by the member of staff. Failure to do so may result in disciplinary action for the member of staff.

Relevant staff members refers to any member of staff, who has direct academic responsibilities or other direct professional responsibilities, for a student. Students who are also staff (for example, a student who is tutoring or teaching other students) would be considered students but also 'relevant staff members' where they have direct academic or professional responsibility for a student.

Sexualised means to make sexual, or attribute sex or a sex role to a situation or to give sexual associations to a situation.

Freedom of speech and academic freedom

Norland has a responsibility, through its policies and procedures, to foster an environment where students feel safe, supported, and able to participate fully in university life. It is important to distinguish between academic content that may be challenging or offensive, where its use serves legitimate academic purpose and is protected under academic freedom, and conduct that is unlawful and contrary to Norland policies, such as harassment and discrimination, which is not.

Support for students who have experienced harassment or sexual misconduct

Norland offers a range of internal support services for students who have experienced any form of harassment or sexual misconduct. Students do not have to go through a situation alone, and accessing support does not mean that a formal report has to be made.

Support available includes the following confidential options:

Sexual Violence Liaison Officers (SVLOs)

svlo@norland.ac.uk

A dedicated team of staff who have trained to support a student after a disclosure of harassment or sexual misconduct has been made. SVLOs can provide initial support with accessing internal procedures and also refer them to external support agencies.

Student support team

student.support@norland.ac.uk

The student support team offers support to students affected by harassment or sexual misconduct, providing a safe space to talk and help to access further specialist help if needed. Student support can make referrals to an SVLO or a counsellor if requested by the student. Student support will also provide support to any student who have been named in a formal report of harassment or sexual misconduct.

Counselling service

The counselling service offers external professional, confidential counselling and wellbeing support. Referrals are made via the student support team or an SVLO.

Personal tutors

Personal tutors offer pastoral support and can signpost students to relevant internal support services if requested/required.

Specialist external organisations

There are a number of local and national organisations which provide specialist support to individuals affected by sexual harassment or violence, domestic and relationship abuse and stalking.

Support for students who have witnessed harassment or sexual misconduct

It is natural for students to feel unsure about what to do after witnessing or becoming aware of an incident of harassment or sexual misconduct. Support is available for students to help process the experience and understand how to respond safely and appropriately.

Support available includes the following confidential options:

Sexual Violence Liaison Officers (SVLOs)

svlo@norland.ac.uk

Contact the SVLO team for advice on how to support someone impacted by sexual misconduct.

Student support team

student.support@norland.ac.uk

Student support offers support to students affected by harassment or sexual misconduct, providing a safe space to talk and help to access further specialist help if needed.

Counselling service

The counselling service offers external professional, confidential counselling and wellbeing support. Referrals are made via the student support team or an SVLO.

Personal tutors

Personal tutors offer pastoral support and can signpost students to relevant internal support services if requested/required. Training will be provided to all students on bystander intervention and how to support others safely.

Support for students who have had an allegation of harassment or sexual misconduct made about them

Being named in a report or involved in an investigation can be distressing and confusing. Dedicated, impartial and confidential support is available for students who have been reported for or are otherwise alleged to have carried out or been part of harassment or sexual misconduct.

Support available includes the following confidential options:

Student support team

student.support@norland.ac.uk

Student support offers confidential support to students who have been reported for, or are otherwise alleged to have carried out or been part of, harassment or sexual misconduct, helping with access to further support if needed.

Counselling service

The counselling service offers external professional, confidential counselling and wellbeing support. Referrals are made via the student support team or an SVLO.

Personal tutors

Personal tutors offer pastoral support and can signpost students to relevant internal support services if requested/required.

Seeking support does not affect the outcome of an investigation, and it is available to students regardless of how far the process progresses.

Academic support

If a student's experience is affecting their ability to engage with their studies or assessment, there is a range of academic support routes available. These can ensure that a student's circumstances are considered.

Resources include:

- **Student Handbook** – outlines a student’s academic rights, responsibilities and guidance on available processes.
- **Exceptional Assessment Circumstances (EACs)** – can be submitted if personal circumstances affect a student’s ability to attend lectures, complete assessments or attend placement.
- **Reasonable adjustments** – such as deadline extensions, alternative assessments or deferral options.

This is not an exhaustive list. The most appropriate support will depend on a student’s individual circumstances. Norland’s academic or support staff can help guide students in the first instances through options and next steps.

Disclosures and formal reports: what is the difference?

Disclosure

A disclosure occurs when a student shares information about an incident of potential harassment or sexual misconduct. This might have been an incident involving another student or a staff member, and a disclosure may be made to a member of Norland staff or to Norland by other means (other than a report). The intention is typically to seek emotional or practical support, advice, and information about formal reporting options.

Formal report or complaint

A written request for Norland to investigate an incident through its procedures is referred to as a formal ‘report’ a per the [Student Disciplinary Procedure](#) or a ‘complaint, under the [Student Complaints Procedure](#).

- A formal ‘report’ can be against another student and is considered under the Cause for Action and [Student Disciplinary Procedure](#).
- A formal ‘complaint’ can be against a member of staff and is considered under the [Student Complaints Procedure](#). This may be referred to the Staff Disciplinary Procedure.

For ease, this document will refer to both ‘formal reports’ and ‘formal complaints’ as ‘formal report’ for the remainder of this document.

Support is available to students before, during and after making a report.

Support when deciding when to report

The SVLO team can provide confidential support if a student is unsure what to do or is seeking help thinking through their options. If a student talks to a member of staff who is not part of the SVLO team, they can help signpost them to an SVLO or another appropriate support service depending on their needs.

What happens after a disclosure?

For disclosures involving another Norland student

Where possible and appropriate to the circumstances it may be possible for the matter to be resolved informally, for example by a Student Support Officer or a Personal Tutor. The member of staff will keep a record of the disclosure and seek advice from the Head of Student and Academic Services.

- The Head of Student and Academic Services will refer to the Cause for Action procedure and will discuss with the students involved to see if there is a mutually agreeable informal resolution that can be reached.
- If an informal resolution cannot be reached, the matter will be escalated to the [Student Disciplinary Procedure](#).

Disclosures involving allegations against a member of staff

What happens after a student's disclosure involving a member of staff will depend on the specific circumstances and the nature of the concern. Each disclosure is considered individually, and the next steps will be guided by what is appropriate and proportionate in that context.

For more details about the process, please refer to the Student Complaints Policy and the Prevention of Harassment and Sexual Misconduct Policy.

Limits to confidentiality when a disclosure is made

Disclosures will generally be kept confidential, and the student's preferences will usually be respected. Norland works to ensure that as much as possible, students are in control of what happens next. However, there are certain situations in which Norland may need to share information, or to act including (but not limited to):

- Where Norland assesses that the welfare of any person requires that a disclosure cannot be kept in confidence, such as where there are welfare concerns that indicate a risk of serious harm in accordance with Norland's Confidentiality Agreement and Student Emergency Contact Procedure.
- Where the disclosure concerns a student and there are Fitness to Practise/Study implications arising from the disclosure.
- Where Norland has safeguarding responsibilities that require further action.
- For the purpose of taking legal action or other specialist advice or to notify insurers.

If Norland does need to act, students will be kept informed throughout where reasonably possible and offered support.

Disclosures and reports against students involving criminal conduct

Some disclosures and reports may involve behaviour that could also be a criminal offence, such as assault, stalking, or threats of violence. These cases are taken seriously, and students can choose whether to report the matter to the police, Norland, or both.

Unless Norland decides that someone's welfare requires sharing the information or there are other exceptional circumstances, Norland will respect students' wishes about whether the matter should be reported to the police.

If the police are involved

If a student reports an incident to the police and there is an active criminal investigation, Norland will usually pause its own disciplinary process. The [Student Disciplinary Procedure](#) details the circumstances under which Norland may investigate at the same time as the police and what precautionary measures might be put in place in the meantime.

Deciding which process to use

Because Norland will not normally investigate while the police are doing so, if a student's report involves criminal conduct, the student may need to decide whether:

- They want the matter to be handled by the police and the courts, or
- They prefer to ask Norland to consider investigating under its own procedures.

Students are encouraged to refer to the [Student Disciplinary Procedure](#) and the Prevention of Harassment and Sexual Misconduct Policy to understand Norland's investigatory process and how it differs from that of the criminal justice system. Norland will support the student in any decision they take, and will provide practical and substantive support through:

- SVLO team: svlo@norland.ac.uk
- Student support team: student.support@norland.ac.uk
- Personal tutors

Disclosures or reports against Norland staff involving criminal conduct

If a disclosure or a report about a member of staff involves behaviour that could amount to a criminal offence, for example assault or threats, it will automatically be escalated to the Staff Disciplinary Procedure in consultation with the Principal and the Head of HR and Compliance.

Making a formal report

If a student decides to make a formal report about harassment or sexual misconduct, support will be available to guide students through the process.

To make a report, you can either

- Complete the online report form [Make a Report](#)
- Email svlo@norland.ac.uk
- Speak to a trusted person who can make the report on your behalf

When Norland may take action (students)

Norland has discretion as to whether or not to investigate, having regard to a range of factors. In particular, Norland will not usually take formal action in relation to matters which occurred more than six months previously. Further relevant factors will include whether the matter has previously been determined by another organisation (e.g. a tribunal) or under another procedure or where another organisation is better placed to respond.

Reports about a member of staff

Formal reports about a member of staff are to be submitted to the Head of HR and Compliance and are considered under the Staff Disciplinary Procedure.

Students can:

- **Email a written report** to the Head of HR and Compliance at stephanie.taylor@norland.ac.uk.
- **Request a meeting** with the Head of HR and Compliance before submitting a report, to discuss concerns and ask questions.

If students are unsure how to begin or would like to speak to someone first, they can contact the SVLO team at svlo@norland.ac.uk for confidential advice. This does not commit a student to submitting a report.

Confidential support is available for students who are uncertain about how to proceed or who need assistance in understanding their reporting options:

- SVLO@norland.ac.uk
- Student.support@norland.ac.uk

Additional reporting options and informal measures

In some situations, students may prefer to explore informal or alternative ways of addressing concerns, particularly if they are not ready to submit a formal report. These options are designed to support student wellbeing and help establish safe and respectful boundaries.

Informal resolution

In some cases, informal resolution may be appropriate. This could include a structured conversation, clarification of expectations, or other practical steps. Please refer to the Cause for Action Procedure for further information about informal resolutions.

Third-party reporting

Reports involving students

In certain cases, a report about a student may be submitted on another student's behalf by a trusted third party where the student consents (for example, their friend).

The SVLO will:

- Need to see evidence that the student consents to both the third party making the report on their behalf and the contents of the report.
- Need to be satisfied that the student understands their role as a reporter.

Reports involving staff

Norland will be limited in the action it can take if the student who is raising the complaint is not willing to take part in the process. If a student has reservations about raising a complaint, they

should discuss their concerns with the Head of Student and Academic Services or the Head of HR and Compliance who will discuss the options available for taking a matter forward, depending on the circumstances.

Students are welcome to have the support of a trusted person, such as another student, a member of staff, or a student support officer, when making the report.

Anonymous reporting

Anonymous reports will only be considered in exceptional circumstances where there are compelling reasons to do so. While limited investigation may be possible in certain cases, it is generally very difficult to proceed without identifying the reporting individual, due to the fundamental requirement that the individual reported against is given the opportunity to respond to the report.

Students should also be aware that, even where a report is submitted anonymously or where identifying information is withheld from the subject of the report, it may still be possible for the individual concerned to infer the identity of the reporting party based on the circumstances described.

Useful documents and guidance

Before making a report, students are expected to read the relevant procedures and guidance as outlined above. These documents explain how to submit a report, what to include, and what to expect from the process:

- [How to make a report](#)
- Preventing Harassment and Sexual Misconduct Policy
- [Student Disciplinary Procedure](#)
- [Student Complaints Procedure](#)

Confidentiality

When a student shares information with Norland about harassment or sexual misconduct, it will be treated with care. We know these matters can be difficult to talk about, and such information will be handled securely, in line with Norland's policies and safeguarding responsibilities.

While the process is ongoing, students will be asked to keep the matter confidential. Some elements of the matter (which will usually include details of Norland's process and outcomes) will remain confidential after the process has concluded, but there will be no limitations placed on a student wishing to speak about their experiences of the underlying events in their own words.

How student information is handled

Information is managed in accordance with Norland's Data Protection Policy and other relevant procedures. Information is only shared when necessary and with as few people as possible, typically to:

- Carry out a fair investigation.
- Carry out procedures related to a report, including instances where the matter progresses under Norland's processes such as disciplinary or appeals procedures.
- Put safety or wellbeing measures in place.
- Comply with contractual obligations.
- Comply with legal or safeguarding duties.
- Support academic arrangements or student welfare.

Depending on the nature of the report, those with whom information is shared may include (but are not limited to) staff in the student support team (for reports about students), relevant heads of departments, college and departmental contacts, individuals involved in the procedure (such as the subject of the report, witnesses, or an internal or external investigator), decision makers in the context of Norland processes, or third parties such as external authorities, regulatory bodies or courts in limited cases.

Who is informed at the outset of the process when a formal report about a student is made?

When a formal report is made, information is shared in a number of ways at the outset of the process, including the examples below:

- The student named in the report will usually be informed of the complaint and the identity of the reporter and will subsequently receive the evidence relied on if the matter is referred for disciplinary action.
- Relevant teams may also be informed and kept updated where appropriate, for example, in relation to Fitness to Practise considerations, or to support other students or implement practical measures.

Who is informed at the outset of the process when a formal report about a member of staff is made?

When a formal report is made, information is shared in a number of ways at the outset of the process, including the examples below:

- The subject of the report will usually be informed of the complaint and the identity of the reporter and will usually receive the evidence relied on as part of Norland responding to the matter and/or any further internal processes.
- Any senior staff who may be taking or supporting decisions on the report, for example a copy of the written complaint will be forwarded to the Principal and, with the student's permission, the relevant head of department of the member of staff and the Head of Student and Academic Services.

Who can students talk to?

Considering the need for confidentiality, Norland will specify that students who have made a formal report or students who are named in a formal report should only discuss the matter with certain people, who are likely to include:

- Any person providing professional support.
- The student's immediate family and/or a close friend in confidence.
- Individuals who they intend to name as witnesses. Such conversations should take place solely for the purpose of discussing the potential witness's involvement. Students should be careful that such discussions do not appear to amount to collusion (or fabricating an untrue account).

Anyone students speak to should understand that the process is confidential, that information should not be shared further, and should be shown a copy of the [Student Disciplinary Procedure](#) for a formal report involving a student, or the [Student Complaints Procedure](#) for a formal report involving Norland staff.

Informing the police in cases involving criminal conduct

If a report involves potential criminal behaviour, Norland will not usually contact the police without a student's consent. However, information may be shared without consent including if:

- There is a serious and immediate risk to the student's safety or the safety of others.
- Norland has a legal obligation to do so.
- A request is made as part of an active police investigation.

In such cases, only the information necessary to meet the purpose for sharing will be shared, and Norland will aim to keep the student informed where reasonably possible.

If students are unsure about confidentiality

If students have questions about confidentiality or how their information will be used, they can ask:

- Head of HR and Compliance at stephanie.taylor@norland.ac.uk
- Head of Student and Academic Services (will be in post from October 2025)

When a formal report of harassment or sexual misconduct is made, Norland may launch an investigation. What happens next depends on whether the report involves a student or a member of staff and is managed under the appropriate procedure:

- [Student Disciplinary Procedure](#) – for reports involving students.
- [Student Complaints Procedure](#) – for reports involving staff.
- Preventing Harassment and Sexual Misconduct Policy.

These procedures outline the investigation process, clarify decision-making responsibilities, and explain how all parties involved will be supported and kept informed.

Information about the Student Disciplinary Procedure (Non-Academic Cases)

Full details about how Norland responds to reports of harassment and sexual misconduct made against a student are set out in the Preventing Harassment and Sexual Misconduct Policy and the [Student Disciplinary Procedure](#), which should be referred to for comprehensive and definitive guidance.

To support students' understanding, the following key aspects are outlined below with reference to the relevant sections of the full procedure:

The decision to investigate

On receipt of a report, the Head of Student and Academic Services will decide whether or not to investigate. In order to make this decision, they may make preliminary enquiries.

If the decision is to not investigate, and the reporting student is dissatisfied with this decision, they have the option to make a complaint under the [Student Complaints Procedure](#).

If the decision is to investigate, the Head of Student and Academic Services will usually send the subject of the report a letter which outlines the allegations made against them i.e.: what alleged conduct will be investigated.

It will normally be appropriate for the subject of the report to be informed of the identity of the reporter in this letter.

Investigatory process

A structured and impartial process is followed when investigating reports. Investigations are conducted by a trained member of staff from the Strategic Leadership Team, all of whom are referred to as 'the Investigator'.

Interviews

The Investigator may take any steps necessary to investigate and to assemble relevant evidence. This may include interviewing the reporter and the subject of the report at an early stage, as well as interviewing any witnesses.

Upon the completion of the investigation, the Investigator will present a written account of the investigation in an Investigation Report.

Full details about the investigatory process, including details of the interview procedure, the ways in which accounts of the reporter and the subject are shared, and an overview of the expected contents of the Investigation Report, can be found in the Preventing Harassment and Sexual Misconduct Policy and the [Student Disciplinary Procedure](#).

Decision-making process-referral for disciplinary action

The investigator will review the information collected and produce a report setting out their conclusions against the applicable definitions of misconduct from the [Student Disciplinary Procedure](#) and the Prevention of Harassment and Sexual Misconduct Policy.

Referral decisions are based on the findings of the investigation and are made by the Head of Student and Academic Services. They will review the Investigation Report and decide whether or not it is reasonable to believe that misconduct may have occurred and that the [Norland Code of Professional Responsibilities](#) has been breached, and whether it is fair, just and reasonable to proceed with disciplinary action by referring the matter for a disciplinary hearing.

Possible outcomes

If the decision is to take no further action, the reporting student will receive an explanation about what, if any, action Norland is going to take as a result of the report (e.g. reviewing its procedures). A reporter who is dissatisfied with the way the Procedure has been followed can appeal the decision.

If the report is to be referred on to a disciplinary hearing an email will be sent to the subject of the report explaining that the matter will be referred to the Student Disciplinary Panel.

The Outcome Letter

The Chair of the panel will communicate the decision in an Outcome Letter.

A reporter who is dissatisfied with the way the Procedure has been followed has the option of making a complaint as described in the [Student Complaints Procedure](#).

What to expect: The Student Disciplinary Panel

The Student Disciplinary Panel will be a panel comprising of three members of senior staff, one of which will be the Principal who will chair the panel.

When the referral to the Student Disciplinary Panel is made, the day-to-day handling of the matter will be transferred to the Principal's Office: principalsoffice@norland.ac.uk

What to expect: The Student Disciplinary Panel Hearing

The subject of a report is permitted to appoint a supporter to attend the hearing with them for moral support. The reporter usually attends part of the hearing as a witness and is also permitted to bring a companion.

The Student Disciplinary Panel hearing is an 'inquisitorial' process. This means that the panel appointed will lead the hearing and decide the case on the basis of the referral and any other additional evidence presented at the hearing.

The Panel will consider the evidence relating to whether there the allegation of misconduct is upheld using the balance of probabilities. The panel will also consider whether there has been a breach of the [Norland Code of Professional Responsibilities](#) and will make a finding on the breach.

If the Panel finds that there has been a breach, they will then consider the question of a sanction, taking into account any mitigating and aggravating factors.

Examples (but not an exhaustive list) of the penalties which the SDP can impose, separately or in any combination, are listed in the [Student Disciplinary Procedure](#).

The Outcome Letter

The Chair of the panel will send the reporter, the subject of the report the panel's reasoned decision including their finding as to whether the subject breached the [Norland Code of Professional Responsibilities](#) details of any penalty in an 'Outcome Letter'.

A reporter who is dissatisfied with the way the Procedure has been followed has the option of making a complaint as described in the [Student Complaints Procedure](#).

Appeals

A formal process is in place for appealing certain decisions, with specified grounds and procedures outlined in the policy.

Appeals should be made in writing, with full supporting evidence, to the Chair of the Board of Directors within 10 working days of the receipt of the letter notifying the student of the Disciplinary Panel decision.

An appeal is not a re-opening of the investigation and reasonable evidence must be provided to substantiate the appeal. Disagreement with the decision of the Disciplinary Panel is not in itself sufficient reason to appeal.

The Appeals Panel will consist of three members of the Board of Directors and will convene to consider whether the documentation of the case suggests that the decision of the original Disciplinary Panel was reasonable and the procedure was followed correctly.

Potential outcomes

The Appeals Panel's decision may confirm or reject the Student Disciplinary Panel's decision (including on any breach and/or penalty) or decide any other outcome which would have been within their power to decide. The Panel's decision will be one from a list detailed in the [Student Disciplinary Procedure](#).

Additional arrangements for harassment and sexual misconduct

In cases involving harassment and sexual misconduct additional considerations and arrangements may be necessary and will be considered under the [Student Disciplinary Procedure](#) with reference to the Preventing Harassment and Sexual Misconduct Policy.

Timescales and influencing factors

Norland's aim is to conclude its consideration of any report under the [Student Disciplinary Procedure](#) within 90 days of the receipt of the report. If the procedure is paused under the criminal conduct provisions or to allow another procedure to follow first (for example Fitness to Study), that period of time will not count towards the 90 days.

Generally, an investigation and a Student Disciplinary Panel hearing should conclude within 70 calendar days, and any appeal to the Appeals Panel should be concluded within a further 20 calendar days. However, this timescale may not be met in certain cases, such as those which are complex due to the unavailability of participants, or for other reasons.

Important note

This summary is provided to aid understanding. The [Student Disciplinary Procedure](#) and the Prevention of Harassment and Sexual Misconduct Policy remain the definitive and complete source of information for reports of harassment and sexual misconduct made against a student.

Information about the Procedure for Complaints of Harassment Against Norland Staff

Full details about how Norland responds to student complaints, including reports of harassment and sexual misconduct made against a member staff are set out in the [Student Complaints Procedure](#) which should be referred to for comprehensive and definitive guidance.

To support students' understanding, the following key aspects are outlined below:

The decision to investigate

On receipt of a report the Head of Student and Academic Services will in consultation with the Head of HR and Compliance, take steps as necessary or appropriate to understand the nature of the report and the outcome sought. In these cases, the Head of HR and Compliance will lead the process and will decide how to proceed and inform all parties in writing. The Head of HR and Compliance may

make such enquiries, or commission an investigation, as necessary, to determine the complaint.

The Head of HR and Compliance may also determine that immediate interim action is necessary, pending the outcome of a formal process. In such cases, the Principal and relevant head of department will be consulted. Suspension of a member of staff can only be approved by the Principal.

Investigatory process

The purpose of an investigation is to establish the relevant factual evidence in connection with the allegations(s) made by the reporter. This will usually involve an appointed investigator meeting separately with the reporter, the subject of the report and any witnesses, and the preparation of a written report which will be forwarded to the Head of HR and Compliance.

Decision-making process

The Head of HR and Compliance will consider the scope and findings of the investigation and whether any further investigation is required before making a decision.

Possible outcomes

Depending on the nature of the complaint and evidence found, including findings of any investigation report, the Head of HR and Compliance, in consultation with the Head of Student and Academic Services and the relevant Head of Department will take one of a number of possible actions, as listed in the [Student Complaints Procedure](#).

The Head of HR and Compliance will inform both the reporter and the subject of the report of their decision in writing.

If the complaint is upheld or partially upheld, it is likely the case will be referred to the Staff Disciplinary Procedure.

The letter to the reporter will state whether the report has been upheld, partially upheld or not upheld. The letter will include any recommendations the Head of HR and Compliance is making in relation to the complaint and information about any right to appeal the Head of HR and Compliance decision.

The Head of HR and Compliance will also inform any other parties who have been asked to participate in an investigation that the investigation has been concluded.

Appeals

If the report is not upheld or only partially upheld, a reporter can appeal in writing to the Principal on specified grounds, normally within 10 days of being informed of the outcome of the report. Appeals are conducted by way of a review of the papers; there is no reinvestigation or rehearing of the evidence.

Timescales and influencing factors

Every effort is made to achieve a prompt resolution to reports, the aim being normally to conclude the investigation within six weeks. Both the reporter and the subject of the report will be expected to co-operate with Norland in achieving that result.

In the case of an appeal the Principal will usually consider the student's appeal and issue a decision within four weeks.

Important note

This summary is provided to aid understanding. The [Student Complaints Procedure](#) remains the definitive and complete source of information for reports of harassment and sexual misconduct made against Norland staff.

Prevention and training

Training

Raising awareness through an effective training programme is an important element of Norland's preventative strategy. Norland has implemented a tiered model of training to ensure that training is relevant and is accessed by those who need it. All staff have to complete the introductory training module that can be accessed via the core training tile on the staff intranet landing page. Additional training is available for student-facing staff to:

- help support students who disclose an incident of sexual misconduct or harassment
- carry out investigations into alleged claims of harassment and sexual misconduct against a Norland student or member of staff
- conduct panel hearings of alleged claims of harassment and sexual misconduct.

These workshops are delivered via an external organisation and are 3-hour long workshops. Refresher training will be available on a three yearly cycle. New staff will be asked to attend the closest workshop to their start date.

Furthermore, bystander training will be provided via an online learning platform. Key staff will become trainers in active bystander awareness to deliver sessions to students and new staff appointed after December 2025.

Norland has a team of trained Sexual Violence Liaison Officers (SVLOs). These individuals will be required to do refresher training every three years unless there is a mandatory update that is required. The training is a Level 3 NCFE accredited course.

Directors of the Board will be encouraged to complete the introductory training module.

All external events are supervised by members of staff and so there is no specific requirement for a guest speaker to do any form of preventing harassment or sexual misconduct training. However, should a guest speaker become employed by or works with Norland on a regular basis, for example, several times per term, then they will be enrolled on the introductory training module.

Student training programme

During Welcome Week, first year students will have a face-to-face training session on consent, reporting an incident to the police and how the legal process works, bystander awareness and local support services.

All students will have a session delivered by the SVLOs on Norland's internal processes, including highlighting this document. Consent and active bystander awareness will also be reiterated in these sessions.

Students will be asked for feedback at the end of the sessions to ensure that the content was understood and check whether there are any comments for improvement they would like to share.

Norland's approach to relationships between students and staff

Positive professional relationships between members of staff and students are central to students' educational development and welfare. It is important that staff recognise that they are in a position of trust, and that it is their professional and ethical responsibility not to abuse that trust. Academic staff are trusted to teach, guide and supervise students. We expect all staff to recognise and maintain professional boundaries, in order to provide students a high quality supportive and safe learning environment, to avoid abuse of trust through the imbalance of power and authority, and to avoid perceived or actual conflicts of interest. For further information, please refer to the Personal Relationships between Staff and Students Policy.

To protect the welfare of students, and in the best interests of staff, Norland:

- Strongly discourages staff from entering into an intimate relationship with a student for whom they have any responsibility; and
- Strongly discourages any other close personal relationship between a staff member and student for whom they have any responsibility that transgresses the boundaries of professional conduct and requires such relationships to be declared.

Where an intimate or close personal relationship exists or develops, the member of staff involved must disclose the relationship immediately. This is to ensure appropriate measures can be put in place to prevent any conflict of interest or abuse of power and authority.

Staff who fail to comply with the policy, or with any arrangements put in place under it, may be disciplined. This provision also applies to Directors, Trustees, consultants appointed on a Service Level Agreement and Bank staff; such individuals are expected to adhere to the policy as other members of staff are required to do.

Assuming responsibility in existing relationships

Members of staff must not take on or assume responsibility for a student:

- With whom they are in an existing intimate relationship or with whom they previously had such a relationship; or
- With whom they are in an existing close personal relationship or with whom they previously had such a relationship without first declaring this to their Head of Department or the Head of HR and Compliance, to enable them to assess the risk of conflicts of interest and put appropriate protective measures in place. Usually, the protective measures will have the effect of avoiding conflicts of interest by ensuring the staff member ceases to have, or does not acquire any, responsibilities.

Even in cases which are not covered by this policy, i.e. where a staff member does not have and is not likely to have responsibility for a student, staff are strongly encouraged to be cautious before embarking on an intimate or close personal relationship with any student.

For any queries regarding the content of this page, please contact the Head of HR and Compliance at NorlandHR@norland.ac.uk