

## **Shockout Sexual Harassment Policy**

**2025 - 2026**

### **1. Purpose and Commitment**

1.1 - Shockout is committed to fostering an environment of dignity, respect, and equality for all members of our community. Every student, staff member, and visitor has the right to study, work, and participate in Shockout life free from sexual harassment, misconduct, or discrimination.

1.2 - This policy sets out Shockout's commitment to preventing and responding to sexual harassment in accordance with:

- The Equality Act 2010
- The OfS Condition E6 (Protection from Harassment and Sexual Misconduct)
- The Universities UK Guidance on Handling Allegations of Misconduct (2022)
- Relevant UK safeguarding and data protection legislation

1.3- Shockout is dedicated to ensuring compliance with OfS Condition E6, which requires higher education providers to take all reasonable steps to protect students from harassment and sexual misconduct, provide accessible reporting routes, and maintain fair, transparent procedures.

1.4- The principal holds overall accountability for compliance with this policy, supported by the Student Support team and the Equality, Diversity & Inclusion (EDI) Committee.

### **2. Scope**

This policy applies to:

- All students, employees, contractors, and visitors of Shockout.
- Conduct that occurs on Shockout premises, during off-campus activities, online or via social media, and at partner institutions or placements where individuals are representing or connected to Shockout.
- Behavior between students, between staff, and between staff and students.

This policy covers both sexual harassment and sexual misconduct,

including incidents arising from online interactions or digital communications.

### **3. Policy Statement**

Shockout has a zero-tolerance stance on sexual harassment and misconduct. Such behavior is a breach of Shockout's values and may also constitute unlawful discrimination under the Equality Act 2010.

All reports of sexual harassment will be taken seriously, investigated promptly, and handled with sensitivity, fairness, transparency, and confidentiality.

Shockout will not tolerate victimisation or retaliation against anyone who reports or supports a report of harassment. Both complainants and respondents will be treated with fairness and provided access to support.

### **4. Definition of Sexual Harassment**

Under the Equality Act 2010, sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of:

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

Examples include (but are not limited to):

- Unwelcome sexual advances or propositions
- Display or sharing of sexually explicit materials (including via social media)
- Unwanted touching or physical contact
- Lewd or suggestive comments, jokes, or gestures
- Requests for sexual favors in exchange for academic or professional benefits
- Persistent unwanted communication of a sexual nature
- Stalking or intimidation with sexual intent

## **5. Consent**

Consent is a freely given, informed, and mutual agreement to participate in sexual activity.

Consent cannot be given where someone is coerced, asleep, unconscious, intoxicated, or otherwise unable to make a clear decision.

Consent may be withdrawn at any time.

## **6. Reporting Sexual Harassment**

Anyone who experiences or witnesses sexual harassment is strongly encouraged to report it. Reports can be made through the following channels:

- Student Support and Wellbeing Office
- Human Resources Department (for staff)
- Business Operations (Staff & Students)
- Principal (Staff & Students)
- Designated Safeguarding Lead (for safeguarding-related incidents)

Additional reporting routes:

- External reporting to the Police or relevant support agencies is always available and will be supported.

All reports will be handled confidentially, and information shared only with those who need to know how to respond appropriately.

Shockout will provide accessible reporting information across all student and staff platforms.

## **7. Investigation and Resolution Process**

7.1- Initial Response: Shockout will acknowledge receipt of the report, assess immediate risks, provide support, and explain the next steps.

7.2- Risk Assessment and Interim Measures: A risk assessment will be carried out to determine any immediate safeguarding concerns and appropriate interim measures (e.g. non-contact orders, timetable

changes).

7. 3- Preliminary Assessment: Determine whether the allegation falls under this policy and if a formal investigation is warranted.

7.4- Formal Investigation: Conducted by independent, trained investigators who will gather evidence and interview relevant parties.

7.5- Outcome and Action: Findings will be shared with both parties. If the allegation is upheld, disciplinary action will be taken in line with Shockout procedures.

7. 6- Right to Appeal: Both complainant and respondent have the right to appeal on procedural or evidential grounds.

Shockout aims to conclude investigations within 60 working days of the formal report. If this timeframe cannot be met, both parties will be informed of the reason and a revised timeline.

All cases will be recorded in a central confidential register to monitor compliance with OfS Condition E6.

## **8. Support and Interim Measures**

Shockout will provide fair and appropriate support to all individuals involved, including both complainants and respondents. Support may include:

- Confidential counselling and wellbeing services
- Academic or workplace adjustments
- No-contact or non-communication orders
- Changes to class, work, or accommodation arrangements
- Referral to external services such as the Police or Sexual Assault Referral Centres (SARCs)
- Access to mental health services

A Safeguarding Risk Assessment will guide the implementation of interim measures to ensure safety and well-being.

## **9. Disciplinary Actions**

Individuals found to have violated this policy may face disciplinary sanctions, including:

- Formal warning
- Exclusion (students)
- Dismissal (staff or contractors)
- Reporting to professional or regulatory bodies where applicable

Sanctions will reflect the seriousness of the behavior and any mitigating or aggravating factors.

## **10. Training and Awareness**

Shockout will:

- Provide mandatory induction and annual training for all staff and students on sexual harassment prevention and reporting.
- Conduct regular awareness campaigns to promote respectful behavior.
- Ensure all investigators, advisers, and disciplinary panel members receive specialist trauma-informed training.
- Engage students and staff representatives in policy review and awareness planning.
- Deliver annual E6 compliance training to senior leaders and safeguarding officers.

## **11. Confidentiality and Data Protection**

All reports and investigations will be managed in line with the UK GDPR and Shockout's Confidentiality Procedures.

Information will only be shared when necessary to ensure safety or fulfil

legal or regulatory obligations.

Records will be retained securely and used for monitoring and reporting to the Office for Students (OfS) as required.

## **12. Monitoring, Review, and Accountability**

Shockout will monitor all harassment reports (in anonymised form) to identify trends, evaluate effectiveness, and inform preventative action.

An annual E6 compliance report will summarise:

- Number and type of cases reported
- Timeliness of case resolution
- Support and training delivered
- Improvements implemented

This report will be reviewed by the student support leads, the EDI Committee, and the principal, and shared with the Board of Governors.

The policy will be reviewed annually or following changes in legislation, OfS guidance, or institutional need.

## **13. Contact Information**

- Principal: [Sue@weareshockout.com](mailto:Sue@weareshockout.com)
- Business operations: [nicoleferris@weareshockout.com](mailto:nicoleferris@weareshockout.com)
- Head of BTEC: [michaellowry@weareshockout.com](mailto:michaellowry@weareshockout.com)
- Human Resources: [angieyvonne@weareshockout.com](mailto:angieyvonne@weareshockout.com)
- Student Support and Wellbeing: [Danniellewest@weareshockout.com](mailto:Danniellewest@weareshockout.com)  
[Rennaewilson@weareshockout.com](mailto:Rennaewilson@weareshockout.com)
- Designated Safeguarding Lead: [lisanorris@weareshockout.com](mailto:lisanorris@weareshockout.com)
- Emergency or immediate danger: Call 999

## **14. Policy Ownership**

Policy Owner: Human resources

Policy Oversight: Principal and Business Operations

Review Cycle: Annual

Next Review: October 2026