

EQUALITY IMPACT ASSESSMENT

Department	Registry
Policy	Harassment and Sexual Misconduct Policy

1. Description

This new policy has been developed in order to respond to the changing regulatory landscape and incorporate the Office for Students (OfS) Condition E6 requirements relating to Harassment and Sexual Misconduct.

See; [Condition E6: Harassment and sexual misconduct - Office for Students](#)

The policy constitutes the Academy's Single Comprehensive Source of Information as outlined in the Condition E6 requirements. It incorporates information contained in the Academy's Dignity at Work Policy (staff) and Academy Regulations (students) into a single document.

The policy is designed to be informative and accessible for staff and students and outlines definitions (which includes the Equality Act 2010), reporting mechanisms and support for students and/or staff experiencing harassment and sexual misconduct in different circumstances. This includes maintaining a responsive and flexible approach within different contexts and in consideration of the needs of the relevant individuals.

The policy is made available to staff and students via SharePoint and externally via the Academy's website at <https://www.ram.ac.uk/policies-and-procedures/harassment-and-sexual-misconduct>

2. Could the policy/project have an adverse impact on equality? Please consider this in relation to the following protected characteristics as defined by the Equality Act 2010:

- Age

- Disability
- Gender re-assignment
- Marriage or civil partnerships
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The policy is compliant with, and upholds, the principles of the Equality Act 2010 and will not have an adverse impact on equality.

3. Does this policy/project provide opportunities to make a positive impact on equality?

Yes, this policy is consistent with the OfS E6 Condition of Registration: Harassment and Sexual Misconduct in order to prevent and reduce unwanted behaviour that would undermine the principles of the Equality Act 2010.

The purpose of the policy includes the following statements:

- Harassment and sexual misconduct are unacceptable and have no place at the Academy. Such behaviours are contrary to the Office for Students definitions where it relates to Higher Education, the Equality Act 2010, Protection from Harassment Act 1997 and Workers Protection Act 2023, and in certain circumstances may constitute a criminal offence.
- The Academy is also legally obliged to take reasonable steps to prevent sexual harassment of its workers (Workers Protection (Amendment of Equality Act 2010) Act 2023).

The policy includes detailed definitions of:

- Harassment - defined by the Equality Act (2010) where conduct is related to one or more of the following protected characteristics: age; disability; gender reassignment; race; religion or belief; sex; and sexual orientation.
- Sexual harassment – defined by the Equality Act (2010) as unwanted conduct or behaviour of a sexual nature, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

The policy's section on consent includes the following statement on capacity to give consent as:

- A person's capacity can be limited temporarily or more permanently, such as when a person has a medical diagnosis, mental health condition or learning disability that limits capacity.

The policy sections on Discrimination and Victimisation include the following statements:

- Discrimination is where someone is treated unfairly or less favourably based on a protected characteristic: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation (Equality Act 2010).
- Victimisation is where someone is treated less favourably as a result of bringing a complaint of harassment, sexual harassment or discrimination, or supporting someone making a complaint, or are perceived to have done so (Equality Act 2010).

The policy states that:

- Staff are made aware of this policy, procedures and responsibilities each year. Staff undertake training through mandatory online modules, in-person sessions, as well as enhanced training for those in specialist roles' and that 'Staff involved in coordinating visiting staff, workers and contractors must also make sure that the third parties are familiar with the contents of this policy and know how to support students to raise concern.

The policy's 'Outline of Support' also states:

- Support for students raising a concern or complaint will be addressed at the earliest opportunity following disclosure. This includes assessing the needs and wishes of the student as well as the specific circumstances of the incident to ensure that support is effective and kept under review.

4. What evidence has been considered? What consultation has been undertaken?

The policy development and consultation process has considered a wide range of information from higher education sector briefings and workshops including, by the OfS, London Higher, Culture Shift, The 1752 Group, and other sector-wide discussion groups.

The Academy's Senior Case Manager consulted with the Academy's Students' Union and student representatives, a core Academy working group including the Dean of Students, and Policy Review Group. This Policy Review Group includes the Registrar and Director of Student Operations, Director of Finance, Director of HR and the Executive Assistant and Secretary to the Governing Body.

The Safeguarding Committee and Belonging Committee were kept updated during the policy development process.

In addition, a Governing Body working group was convened in April 2025 to consider and propose an overarching strategic position in the context of the Academy community, which has also been incorporated into the linked Intimate Personal Relationships Policy.

The Academy's Senior Case Manager ensured that the policy is consistent with the provisions of the OfS E6 Conditions of Registration as well as the Equality Act 2010, and the policy has been reviewed by the EIA sub-committee.

5. What actions have been agreed as a result of this EIA?

The policy achieves its core purpose in outlining the Academy's position in relation to preventing and responding to, unwanted behaviour that may be contrary to the OfS E6 Conditions, as well as the principles of the Equality Act (2010).

The following monitoring actions are included. Actions will be reviewed, and progress/completion reported to the Safeguarding Committee and Belonging Committee.

Action	Timescale
Training: monitor and report on staff training delivered via online modules, in-person sessions, including enhanced training, as required.	Ongoing.
Reporting: continue to review reporting mechanisms to ensure these are accessible and meet the needs of all students/staff.	Ongoing.
Data Monitoring: collect anonymised data to identify trends and address any associated concerns related to protected characteristics.	Ongoing.

EIA approved by Belonging Committee: 4/11/2025