

# **Moulton College Single Source Document**

## **Full compliance with the Office for Students (OfS) Condition of Registration E6 (Harassment and Sexual Misconduct)**

**Date: 1<sup>st</sup> August 2025**

### **1. Introduction**

- 1.1 This document outlines how Moulton College complies with OfS Condition of Registration E6. Condition E6 requires providers to take all reasonable steps to prevent and respond effectively to incidents of harassment and sexual misconduct affecting students.

### **2. Summary of OfS Condition E6**

3. Moulton College must:

- Take all reasonable steps to prevent harassment and sexual misconduct.
- Ensure effective, fair, and timely processes are in place for handling complaints and disclosures related to harassment and sexual misconduct.
- Support students who disclose or report harassment and sexual misconduct.
- Take appropriate action against those found to have committed harassment or sexual misconduct.

### **4. Governance and Responsibility**

- 4.1 Moulton College policies are all approved by the governing body, including student governors. The safeguarding of students is given paramount importance and safeguarding responsibility runs through the organisation.
- 4.2 The Principal and Chief Executive, reporting to the Chair of Governors, takes ultimate responsibility for compliance with Condition E6.
- 4.3 The Executive Director of Human Resources holds responsibility for responding to concerns regarding staff conduct and compliance with E6.
- 4.4 The Senior Person with Safeguarding Responsibility has responsibility for student safety and support.
- 4.5 The Executive Director for Excellence and Innovation, and the Designated Safeguarding Lead oversee the operational delivery of related policies and procedures.

## **Preventative Measures**

### **5. Policies and Codes of Conduct**

5.1 College-wide policies relating to behaviours and expectations in-line with E6 are as follows:

- Prevention of Sexual Harassment Policy
- Anti Bullying Policy
- Child on Child Abuse Policy
- Mental Health and wellbeing Policy
- Prevent Duty Policy
- Safeguarding Policy
- Freedom of Speech Policy

5.2 The Staff Code of Conduct states that staff will not act in a way that is discriminatory, not share personal contact details with students and avoid inappropriate physical contact with students.

5.3 The College does not use non-disclosure agreements (NDAs) in any cases, including sexual misconduct. Relationships between staff and students which would constitute an abuse of power would be considered serious misconduct and may result in dismissal.

5.4 In the Prevention of Sexual Harassment policy it asserts: “an intimate relationship between a member of college staff and a student where this may constitute an ‘abuse of power’ would be considered serious misconduct and could result in dismissal.”

### **6. Awareness and Training**

6.1 Training for Students will be provided by relevant HR and HE Staff and Wellbeing Staff, or an external organisation. In the event that training is provided by an external provider and cannot be delivered during induction then relevant staff will provide necessary training prior to more in depth training delivered later in the year by the external provider.

6.2 Awareness for students is in the form of posters and cards inside toilets, stairwells, and certain communal spaces in the College.

- The posters contain contact details to report unwanted sexual contact or harassment. The poster also contains details about the Safeguarding Team, HE Wellbeing Support and the Wellbeing Guide.
- The cards explain consent to students, provide a QR code link to the Police made video ‘Tea and Consent’ and directs the students to HE Wellbeing if they have any questions about consent.

- The student Hub, and electronic dashboard available for all students, holds a [dedicated page](#) in relation to Condition E6: Harassment and Sexual Misconduct. This is highlighted by all resources provided across the college.
- 6.3 The Freedom of Speech Policy sets out protections for freedom of speech on site and encourages healthy debate among the student population, staff and visiting speakers.
- 6.4 Training for Staff will be provided by relevant HR Staff, alongside key Wellbeing Staff, or an external organisation. In the event that training is provided by an external provider and cannot be delivered during induction then relevant staff will provide necessary training prior to more in depth training delivered later in the year by the external provider.
- 6.5 Staff are also required to complete annual training via Smart Log on safeguarding which includes handling of disclosures and Equality and Diversity Awareness which concerns discrimination of protected characteristics.
- 6.6 Extra training for HE staff includes an optional safeguarding course, access provided by UoN, which acts as supplementary to the Smartlog training and is more relevant to the HE sector. UoN have also allowed our staff access to their training on Consent.
- 6.7 Training for staff in with safeguarding and wellbeing team who will receive the majority of first disclosures and follow up with support for students who disclose to another member of staff.
- 6.8 This enhanced training includes:
- Designated Safeguarding Lead – initial training.
  - Northamptonshire Safeguarding Children Partnership – numerous training courses.

## **Training for staff who will investigate claims against staff**

## **Response and Support Framework**

### **7. Reporting and disclosure mechanisms**

- 7.1 Students can report via email or text message to the HE Success Coach or safeguarding team, these contact details are advertised in every toilet cubicle in the College, as well as HE social spaces.
- 7.2 Students are encouraged to download SafeZone during induction and reminded every tutorial with the HE Success Coach. The QR code for SafeZone is also listed on the posters placed inside toilet cubicles and social spaces. SafeZone allows students to alert security if they feel they are in any danger. SafeZone also allows students and staff to report welfare abuse or harassment issues

anonymously, with the option to share or not share the location from where the report is made.

- 7.3 staff must document and report any incidents of harassment or sexual misconduct via MyConcern to ensure the students are afforded care and support from the safeguarding and wellbeing team. Staff must also report sexual misconduct or harassment to HR if they have concerns about a member of staff.

## **8. Fair and Timely Investigations**

- 8.1 The Prevention of Sexual Harassment Policy asserts that investigations will be timely, confidential and sensitive. Investigations into staff and student misconduct are undertaken via a structured and transparent disciplinary process through the HR team.
- 8.2 Once the investigation is complete all parties shall be informed separately, in writing, of the outcome.
- 8.3 An informal approach may be tried prior to formal proceedings, on a case-by-case basis.

## **9. Fair and credible investigation and decision-making processes**

- 9.1 The *Child-on-Child Abuse Policy* which concerns any student-on-student abuse, including students aged 18 and older, asserts that “The student making the allegation will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that will be offered.”
- 9.2 The College’s *Child-on-Child Abuse Policy* also provides a flowchart for clarity, including any need for criminal proceedings.

## **10. Sanctions and Disciplinary Action**

- 10.1 If a student has been found to harass or commit sexual misconduct to another student, they may be placed on the disciplinary process which could lead to their termination as a student. They may be automatically terminated based upon the severity and validity of the claim; they may also be referred to the police for criminal proceedings.
- 10.2 If a member of staff has been found to harass or commit sexual misconduct to a student, they may be placed on the disciplinary process which could result in loss of employment. They may automatically lose their employment or be reported for criminal proceedings based on the severity and validity of the claim. The Prevention of Sexual Harassment policy also covers third parties such as visitors or customers.

## **11. Student Support**

- 11.1 Students can contact the HE Success Coach to access Wellbeing Support via email or text message. This will result in one-to-one appointments being scheduled.
- 11.2 Students can access the Wellbeing Hub, staffed by wellbeing and safeguarding staff, open 5 days a week, on-site.
- 11.3 Students have access to the Student Support Programme, a 24/7 free helpline for all Moulton students.
- 11.4 In certain cases, immediate action of moving or suspending the alleged harasser may be required but care must be taken to ensure that no action could be perceived as punishing the person who raised the complaint.
- 11.5 The Safeguarding Team have a practice of creating academic safety plans for students where there is serious safeguarding and wellbeing concerns. These plans involve academic adjustments where needed.
- 11.6 Support will be given to anyone who reports a concern or witnesses sexual harassment. This support may be in the form of Wellbeing support from the wellbeing and safeguarding team, or a referral to a specialist organisation such as Rape Crisis or Serenity.
- 11.7 Students can also access, via the HE Wellbeing Guide, a number of external organisations that can provide support, if they wish to self-refer or contact helplines.

## **12. Monitoring and Evaluation**

- 12.1 Safeguarding Manager provides an annual update to Governors on all Safeguarding matters including harassment and sexual misconduct.
- 12.2 Student Reps and Student Governor feedback is invited on all matters pertaining to their experience at Moulton College.

## **Human Resources**

## **13. Continuous improvement and sector engagement**

- 13.1 Prevention of Sexual Harassment Policy to be reviewed every two years. All relevant policies are subject to periodical review and approval.

13.2 The Safeguarding and Wellbeing Team are continuously testing and sourcing further training to be offered to staff.

13.3 We will continue to work closely with UoN regarding training and best practice sharing.

#### **14. Declaration**

14.1 Moulton College confirms that it meets all requirements of OfS Condition E6 and remains committed to fostering a safe, inclusive, and supportive culture for all students and staff.

Version 1;  
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