

International Business College

Harassment and Sexual Misconduct Policy

(Office for Students Condition of Registration E6:
Harassment and Sexual Misconduct)

1. Introduction

IBCM is committed to fostering a learning and working environment where all members of the community feel safe, respected and supported.

This document outlines how International Business College Manchester (IBCM) 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. Scope

The policy applies to:

- All students enrolled at IBCM, including those studying face to face, remotely or via blended learning
- All staff, contractors and third parties engaging with students
- All activities – whether conducted on or off site (including placements and site visits)

3. Summary of OfS Condition E6

IBCM 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 acts of harassment or sexual misconduct

4. Definitions

For the purposes of this policy:

- **Harassment** means unwanted behaviour related to a relevant protected characteristic (as defined in the Equality Act 2010) that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment
- **Sexual misconduct** includes, but is not limited to: sexual harassment, sexual assault, rape, stalking and any other unwanted sexual acts or communicators

5. Responsibilities

- The Managing Director, reporting to the Governing Body, takes ultimate responsibility for compliance with condition E6.
- The Principal, as Designated Safeguarding Lead (DSL) holds responsibility for responding to concerns regarding staff conduct and compliance with E6.
- The Principal, as DSL has responsibility for student safety and support
- The Principal/Academic Manager/Quality Manager share oversight of the operational delivery of relevant policies and procedures

6. Preventative measures

Policies: A number of college-wide policies exist relating to behaviours and expectations which align with E6 requirements and which also regulate staff-student relationships (see section 9 below).

NDA's: The college does not use non-disclosure agreements (NDA's) 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.

Awareness: Posters and information displayed throughout the college, promoting respect inclusivity and safe college environments

Training: All staff are required to undergo Prevent and Safeguarding Training on commencement of their employment and on an annual basis. The Safeguarding training covers harassment and sexual misconduct and includes consent, reporting procedures and active bystander intervention.

7. Reporting and handling incidents

Students, staff and third parties can report harassment or sexual misconduct through the following channels:

In-person to the Principal or HR Officer/Welfare Officer

Via Email to: principal@ibc-manchester.com or welfare@ibc-manchester.com

You can also complete a form online via the IBCM website – www.internationalbusinesscollege.ac.uk which can be done anonymously if preferred

Reports can also be made by a third party, again this can be done anonymously.

All reports will be handled in accordance with the following principles:

Fairness: Ensuring impartiality for all parties involved

Sensitivity: recognising the impact of trauma and respecting confidentiality

Transparency: communicating outcomes and decisions to relevant parties

Outcomes may include informal resolution, disciplinary action, safeguarding interventions, or referrals to external authorities where appropriate.

8. Student support

IBCM will provide tailored support for:

- Students who report harassment or sexual misconduct
- Students accused of harassment or sexual misconduct
- Witnesses or others affected

Support includes:

- Counselling and well-being services
- Academic adjustments if needed (eg deadline extensions)
- Assistance in reporting to the police, or accessing external specialist services
- Named support contacts for case management

Support is available regardless of whether a formal complaint is made.

9. Freedom of speech and academic freedom

This policy is implemented consistently with the obligations and commitment of IBCM to uphold freedom of speech and academic freedom. Exposure to lawful academic content, discussion of controversial ideas, or participation in open debate, even if unsettling to some, does not constitute harassment unless it is targeted, personal and unlawful.

10. Monitoring and continuous improvement

IBCM will:

- Monitor reports and case outcomes
- Evaluate the effectiveness of this policy through feedback
- Review and update this policy annually
- Report on compliance with condition E6 to the Governing Body

11. Related policies:

- Safeguarding Policy
- Online safety policy
- Freedom of Expression policy
- Disciplinary Policy
- Student charter
- Staff handbook
- IT user agreements (staff, students)
- Equality and Diversity policy

12. Version History

Version	26.1
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Originator	Quality Manager
Approved by	IBCM Governing Body
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