

Pembroke College Procedure on Harassment

Application of the Policy

1) Harassment is a serious offence and the College treats allegations of harassment with the utmost seriousness. The College is committed to supporting any member through what can be a very difficult and upsetting process. Any member of the College community who feels they have been subject to harassment can make a complaint via the appropriate Procedure: see

- Annexe A for the Procedure in relation to complaints about staff; and
- Annexe B for the Procedure in relation to complaints about students

2) When a criminal offence may have been committed, the relevant harassment Procedure may not be appropriate. These cases will include, but not be limited to, serious assault or threat of serious assault. Student and staff members can seek advice from the college or university and/or approach the Police directly. Further guidance on dealing with cases of sexual assault or sexual violence is available from the University at [Guidance for staff on handling cases of sexual assault or sexual violence](#).

3) Harassment that occurs primarily outside of the college environment and within the University environment will normally be dealt with under the appropriate University procedure. These procedures can be found at:

www.admin.ox.ac.uk/eop/harassmentadvice/policyandprocedure/

4) Anyone involved in a complaint (including any witnesses who may be interviewed as part of any investigation, or trade or student union representatives supporting any of the parties) should maintain the confidentiality of the process in line with the college's policy on confidentiality. https://www.pmb.ox.ac.uk/sites/default/files/library/Documents/General/confidentiality_statement.pdf

5) If a complainant is deemed to have known or to have reasonably been expected to know that a complaint was unfounded, the allegation of harassment may be judged to be vexatious or malicious, and disciplinary action may be taken against them. No action will be taken if a complaint which proves to be unfounded is judged to have been made in good faith.

6) This Policy and Procedure may be found at <https://www.pmb.ox.ac.uk/content/support-pembroke> and is available in hard copy from the Academic Office. Copies in alternative formats are available on request.

7) This Policy and Procedure will be subject to regular review by the College's Student Welfare and Equalities Committee and the Staff Welfare and Equalities Committee.

Annex A: Complaints of harassment against College staff

The Home Bursar will handle complaints about non-academic staff and the Academic Director will handle complaints about academic staff. Welfare advice and support is available from a wide range of sources, but specialist advice is available from the university's harassment line or the college harassment advisers. If the complaint is serious, then it may also be made to the police.

- 1) The Procedure below applies in all cases where the person who is the subject of the complaint is employed by Pembroke College as a member of staff, or who has an association with the college short of an employment contract, and the complaint arises in the context of their work for or association with the college.
- 2) The Home Bursar will have oversight of all cases related to non-academic staff, and the Academic Director will have oversight of all cases related to academic staff. They will take the lead as appropriate in liaising with other parts of the collegiate University. They will act as a source of information and advice for the College on cases of harassment, and will make referrals as appropriate. They will also be responsible for recording and reporting of cases referred to their office under this Procedure.
- 3) Complainants may access support from inside or outside the college as they choose. The Harassment Adviser is particularly trained to support individuals making complaints about harassment, but individuals may also seek support in the college from the Welfare and Wellbeing Co-ordinator, Staff welfare advisers, peer supporters, Chaplain, Academic Director, Academic Registrar, Home Bursar and Junior Deans. In the university they may seek support from the Harassment Line. Anyone who is accused of harassment may also seek support from inside the college or external sources.
- 4) This complaints Procedure may not be applicable where the allegations are of behaviours that may attract criminal sanction. These cases may include, but are not limited to, cases of serious assault or threat of serious assault. In the first instance such allegations will normally be a matter for police investigation and action. This complaints Procedure therefore focuses on complaints of harassment which can be dealt with within the College environment.

Initial action

If possible, the Home Bursar or Academic Director will try to resolve things informally, including through conciliation or mediation.

- 5) In some cases, an individual who feels that they are being harassed by a member of staff may feel able to approach the person in question to explain what conduct they find upsetting, offensive or unacceptable, and to ask that person to refrain from that behaviour. At no time should anyone feel obliged to approach an alleged harasser, and the College does not wish to suggest that anyone who feels that they have been harassed is responsible for rectifying the situation.
- 6) The Procedure below assumes that the individual has not been able first to resolve the issue through an informal approach. If a member of domestic staff wishes to seek informal resolution, they should approach the Home Bursar to ask for help in achieving

a resolution of the problem. Students or academic staff should approach the Academic Director.

- 7) The Home Bursar or Academic Director may ask the parties to consider entering into a mediation or conciliation process. Although mediation or conciliation may be attempted at any time before or after a formal investigation, it may be particularly helpful if it is considered at an early stage before the formal procedure is invoked. All those involved in the mediation or conciliation process must maintain appropriate confidentiality.

Next steps: Complaints procedure

If that's not possible, then a written complaint should be made. Advice is available on how to do this.

- 8) If informal action does not succeed in resolving the situation, or would not be appropriate given the nature of the complaint, the complainant should make a written complaint. The complaint should be sent to the Academic Director in the case of complaints about a member of academic staff and to the Home Bursar in the case of complaints about a member of non-academic staff. In cases where it is not immediately clear to whom a complaint should be addressed, or if the complainant feels it is not appropriate to approach the Home Bursar or Academic Director, advice may be sought from the Harassment Advisors or a senior member of the Student/Staff Welfare and Equalities Committee¹. Students and staff can seek support from College Harassment Advisors or the university's Harassment Line throughout the complaints process.

Submission of the complaint

The complaint should be made in writing, with as much detail as possible about what happened and what resolution is requested. The Home Bursar or Academic Director will then meet the complainant and talk through the process of what happens next – and following that, they will aim to investigate within six weeks. Anyone making a complaint may bring someone along to any meeting for support.

- 9) In the submission to the Home Bursar or Academic Director the complainant should set out as clearly and succinctly as possible:
 - the nature of the behaviour that they are concerned about;
 - the effect of this behaviour on them; and
 - the resolution they are seeking.
- 10) The complaint should include dates and details of any witnesses to any incidents referred to in the complaint, together with any documentary evidence. The complainant should also explain what attempts, if any, have been made to resolve the difficulties and the outcome they are seeking. The Home Bursar or Academic Director will hold an initial meeting with the complainant to explain the process of what happens next.

¹ Academic Director, Home Bursar, Welfare and Equalities Fellow, Chaplain, Dean, Head Porter

- 11) Every effort will be made to achieve a prompt resolution to the complaint – the aim being to conclude the investigation within a period of no more than six weeks. Both the complainant and the person who is the subject of the complaint will be expected to co-operate with the College in achieving that result. If it is not possible to resolve the issue within this timeframe, for example for reasons of complexity or the absence of relevant parties from Oxford, both parties will be kept informed.
- 12) Both parties to the complaint have the right to be accompanied and supported by a trade union representative, or by a colleague of their choice from within the College, at any meeting held under this procedure. If the complaint involves a student they may be accompanied by another student member of the College or a member of the College's welfare team, a senior member of the College, or a member of staff from Oxford SU's Student Advice Service. These people must maintain appropriate confidentiality.

Action by the Academic Director or Home Bursar on receipt of a complaint

The Academic Director or Home Bursar will then carry out an initial investigation, which may involve talking to the person who is the subject of the complaint and to anyone else relevant. This will all be handled confidentially, and anyone involved may be accompanied at any meeting. The Home Bursar or Academic Director will then write to all involved with the outcomes of this initial investigation and the next steps.

- 13) On receipt of a complaint, the Home Bursar or Academic Director will take such steps as they think necessary or appropriate to understand the nature of the complaint and the outcome sought which may include:
 - informing the person against whom a complaint has been made of the allegations against him or her;
 - meeting separately with the complainant and the alleged harasser (at which meetings they should be provided with the right to be accompanied);
 - speaking to other relevant people on a confidential basis; and/or
 - obtaining further relevant information.
- 14) The Home Bursar or Academic Director will then decide how to proceed and will inform the parties in writing. They may themselves make such enquiries as are necessary to determine the complaint, or may commission an independent investigation.
- 15) They may also determine that immediate interim action is necessary pending the outcome of a formal process.

Action by the Home Bursar or Academic Director in cases raising serious concerns, but where no formal complaint is made

If the Home Bursar or Academic Director are aware of a situation arising which is serious, but where no formal complaint has been made, they may still

investigate this. Any decision to do so will be made following consultation with other senior members of the Student/Staff Welfare and Equalities Committee.

- 16) There may be circumstances in which an aggrieved party is not willing, or able, to make a formal complaint but the Home Bursar or Academic Director considers that the implications for the aggrieved person or others actually or potentially affected are serious. This may include cases where other parties, but not the aggrieved party, have made a complaint. In this case, having consulted with two other senior members of the Student/Staff Welfare and Equalities Committee, the Academic Director or Home Bursar may initiate an investigation and make a decision on further action on the basis of such evidence as is available.

Investigation

Depending on the outcome of the initial investigation, an impartial investigator may be appointed to carry out a formal investigation. This will be concluded as soon as possible

- 17) The purpose of an investigation is to establish the relevant factual evidence in connection with the allegation(s) made by the complainant.
- 18) The Academic Director or Home Bursar will appoint an investigator who has had no previous involvement with the case, or with the parties to the case: the Investigator may be from another college.
- 19) The procedure for an investigation will normally be as follows, but may be adapted by the Investigator to meet the needs of the case:-
- a) The Investigator will meet the complainant to confirm the details of the complaint.
 - b) The complaint as clarified will be forwarded to the person complained against together with any other relevant material that the Investigator has.
 - c) The Investigator will interview, where reasonably practicable, individuals identified by the complainant as having relevant evidence.
 - d) The Investigator will meet the person complained against to hear their response to the complaint and any further evidence that has come to light.
 - e) The Investigator will interview, where reasonably practicable, individuals identified by the person complained against as having relevant evidence.
 - f) Having considered all the evidence, including any relevant documents, the Investigator will prepare a written report of their findings, in relation to which they may check relevant sections in draft with the parties before finalising.
 - g) The report will be forwarded to the Academic Director or Home Bursar.
- 20) The investigation should be concluded as soon as is reasonably practicable. The Investigator will prepare a report and may, if specifically requested to do, make recommendations on possible courses of action.
- 21) The Home Bursar or Academic Director will ensure that appropriate support is available to students and staff following an investigation.

Possible outcomes of a complaint

The Academic Director or Home Bursar will write to the complainant and to the person who is being complained about, with the outcomes of the investigation. Possible outcomes include no further action; informal action including advice, training and ongoing monitoring, or a recommendation for formal disciplinary action.

- 22) The Academic Director or Home Bursar will inform the complainant and the person who is the subject of the complaint in writing (i) of the conclusions they have reached having reviewed the evidence, including any investigation report; (ii) of the action they intend to take; and (iii) of the reasons for any such action.
- 23) The Academic Director or Home Bursar will also inform any other parties who have been asked to participate in an investigation that the investigation has been concluded.
- 24) Depending on the nature of the complaint and the evidence found, including the findings of any investigation report, the Home Bursar or Academic Director, in consultation with relevant College Officer(s), will either:-
 - a) Take no further action, other than, where appropriate, implementing or suggesting steps that would help to restore reasonable professional relationships between the parties. This approach will usually be appropriate where the claim(s) of harassment are considered to be unfounded and where there is a continuing relationship between the parties.
 - b) Initiate resolution of the issues (e.g. by requiring that certain individuals undergo specific training, or implementing practical arrangements to improve professional relationships). If a successful resolution is achieved the case will be closed, but the situation will be monitored for an appropriate period. This approach will usually be appropriate where the evidence does not support a claim of harassment but it is clear that either party has demonstrated behaviours that are likely to lead to further issues between them if unresolved or, alternatively, that there are structural issues within the College that require management attention.
 - c) Institute disciplinary proceedings where the Academic Director or Home Bursar is reasonably satisfied that there is evidence to support allegations of harassment of a sufficiently serious nature that should be further examined through the disciplinary process. In this event, the Academic Director or Home Bursar will determine what intermediate measures are necessary, including any re-allocation of duties, in consultation as appropriate with the relevant department.
 - d) In rare cases disciplinary action may be instituted against the complainant if the Academic Director or Home Bursar is satisfied that the complaint of harassment is unfounded and not made in good faith.

Appeal from this decision

The complainant, or the individual complained about, may appeal a decision under the college's normal disciplinary and grievance processes. The Home Bursar or Academic Director will include details of how to make an appeal in the letter setting out the outcome of the complaint.

- 25) If either party does not accept the outcome of the complaint (including any judgement that the complaint was vexatious), they may invoke the relevant grievance or complaint procedure within the time scales specified. If the complainant is a student, a Completion of Procedures letter should be issued at the appropriate time.
- 26) If a student complainant is not satisfied with the outcome following the investigation of the formal written complaint, they may be able to apply to the Office of the Independent Adjudicator for Higher Education (OIA) for a review of the case. They must do so within three months of the date of the Completion of Procedures letter.

Confidentiality

- 27) Information concerning allegations of harassment must so far as reasonably possible be held in confidence by those to whom it is divulged. Unnecessary disclosure of such allegations may attract disciplinary sanction. Information will be shared on a need-to-know basis, including as appropriate with the individual against whom a complaint is brought. Once a formal complaint is pursued, it is likely to be appropriate and/or necessary for certain information to be provided to others within the College, the University, or to external bodies. The College's confidentiality policy applies in these situations.
- 28) Those to whom disclosure may be made outside the University include the police, the Office of the Independent Adjudicator ("OIA") and the civil and criminal courts. The College will not normally report a matter to the police without the complainant's agreement, except in those rare circumstances where there is sufficient evidence to suggest that an individual poses an extreme risk.

Records

- 29) The College and all those involved in this process must comply with the principles of the Data Protection Act 1998⁷. These include ensuring that personal data is kept accurate and up-to-date, held securely, and not kept for longer than necessary.
- 30) Those interviewed in the course of any investigation will be asked to review the notes of their individual discussions with the Investigator as soon as is reasonably possible in order to comment on any inaccuracies or omissions.
- 31) The Home Bursar or Academic Director should be consulted by any Investigator that they have appointed about filing and retaining any notes and documents, all of which must be held in confidence.

Annex B: Complaints of harassment against students

1) This Procedure is designed to deal with student complaints of harassment by other students that arise in the context of Pembroke College. If a student is unsure whether a particular instance of harassment falls under the University's procedures or College procedures, they should seek advice from the Academic Director, the University's Director of Student Welfare and Support Services (DSWSS) or a Harassment Advisor.

2) If a member of College staff wishes to make a complaint of harassment against a student, this will normally be considered as a disciplinary issue and will be handled in accordance with the college's regulations. In the first instance, a member of staff should seek support and guidance from the Home Bursar (non-academic staff) or the Academic Director (academic staff).

3) The Academic Director will have oversight of all cases that fall under this Procedure, and will take the lead as appropriate in liaising with other parts of the collegiate University. The Academic Director will act as a source of information and advice for the College on student cases of harassment, and will make referrals as appropriate. They will also be responsible for recording and reporting of cases referred to the Dean under this Procedure.

4) Complainants may access support from inside or outside the college as they choose. The Harassment Adviser is particularly trained to support individuals making complaints about harassment, but individuals may also seek support in the college from the Welfare and Wellbeing Co-ordinator, peer supporters, Chaplain, Academic Director, Academic Registrar, Home Bursar and Junior Deans. In the university they may seek support from the Harassment Line.

5) Support from the Harassment Advisors is also available to students against whom complaints of harassment have been made and will be equivalent to that available to a student who feels that they are being harassed by another student.

6) This complaints Procedure may not be applicable where the allegations are of behaviours that may attract criminal sanction. These cases may include, but are not limited to, cases of serious assault or threat of serious assault. In the first instance such allegations will normally be a matter for police investigation and action. This complaints Procedure therefore focuses on complaints of harassment which can be dealt with within the College environment

Initial Action

Students may choose to try to resolve matters directly with the other student, but should never feel any pressure to do so. Students are strongly advised to access specialist advice as early as possible. The Academic Director can help with advice on the process and possible ways of resolving things informally, including conciliation and mediation.

7) In some cases, a student who feels that they are being harassed by another student may feel able to approach the person in question to explain what conduct they find upsetting, offensive or unacceptable, and to ask that person to refrain from that behaviour. At no time should a student feel obliged to approach an alleged harasser, and the College does not wish to suggest that a student who feels that they have been harassed is responsible for rectifying the situation.

8) Before taking informal action, the student could discuss the situation with a College Harassment Advisor. If the student does not feel comfortable contacting a College Harassment Advisor, they can contact the Harassment Line for details of another advisor (Tel. 01865 270760 or e-mail harassment.line@admin.ox.ac.uk). Harassment Advisors will not approach the alleged harasser on behalf of an individual. Details of the role of the harassment advisor can be found at

www.admin.ox.ac.uk/media/global/wwwadminoxacuk/localsites/equalityanddiversity/documents/harassment/role.pdf.

Other sources of advice when considering informal resolution may include tutors, senior members of the Student Welfare and Equalities Committee, JCR and MCR welfare representatives, Student Peer Supporters, and Oxford SU's Student Advice Service (Tel. 01865 288466 or e-mail advice@ousu.org).

The Academic Director will oversee all cases, and will advise and take action as appropriate. If a student wishes to seek informal resolution, they should approach the Academic Director to ask for help in achieving a resolution of the problem. Actions taken will vary depending on the case and may include:

- Giving advice on options for ways to proceed, and helping the student to make decisions on the action they want to take;
- Referring the student to appropriate support services (such as the Student Counselling Service, and OUSU Student Advice Service);
- Referring a case to the University, if it transpires that the alleged harassment did in fact take place outside of the college environment and within the University environment;
- Inviting the individuals concerned to consider mediation or conciliation, and arranging this if both parties are in agreement

Brief records will be kept of all meetings held and actions taken in relation to the case at this stage. These records will be managed in accordance with the principles of the Data Protection Act 1998⁹. These include ensuring that personal data is kept accurate and up-to-date, held securely, and not kept for longer than necessary.

Formal written complaint

If the issue cannot be resolved informally, then the student should submit a formal complaint to the Dean.

9) If informal action does not succeed in resolving the situation, or would not be appropriate given the nature of the complaint, the student should make a formal written complaint to the Dean. In some cases, it will be appropriate to proceed directly to this stage. In these cases, if the complainant has not already been offered appropriate support from a trained member of staff, this will happen.

10) The complaint should normally be made as soon as possible after the event(s) to which it refers, or normally within one month of the completion of any informal resolution attempts.

11) The complainant should set out as clearly and succinctly as possible

- the nature of the behaviour that they are concerned about;

- the effect of this behaviour on them; and
- where possible, the resolution they are seeking.

12) The complaint should include dates and details of any witnesses to any incidents referred to in the complaint, together with any documentary evidence. The complainant should also explain where appropriate any attempts that have been made to resolve the difficulties and, where possible, the outcome they are seeking.

13) Every effort will be made to achieve a prompt outcome to the complaint – the aim being to conclude the complaint within a period of one month. Both the complainant and the student who is the subject of the complaint will be expected to co-operate with the College in achieving that result. If it is not possible to resolve the issue within this timeframe, for example for reasons of complexity or the absence of relevant parties from Oxford, both parties will be kept informed.

14) At all times both parties will have the right to be accompanied at meetings by another student member of the College, a member of the College welfare team, a senior member of the College, or a member of staff from Oxford SU's Student Advice Service.

Action by the Dean on receipt of a complaint

The Dean will then carry out an initial investigation of the complaint and decide which steps need to be taken

On receipt of a complaint, the Home Bursar or Academic Director will take such steps as they think necessary or appropriate to understand the nature of the complaint and the outcome sought which may include

- informing the person against whom a complaint has been made of the allegations against him or her;
- meeting separately with the complainant and the alleged harasser (at which meetings they should be provided with the right to be accompanied);
- speaking to other relevant people on a confidential basis; and/or
- obtaining further relevant information.

15) The Dean will then decide how to proceed and will inform the parties in writing. They may themselves make such enquiries as are necessary to determine the complaint, or may commission an independent investigation.

16) In some circumstances, in the interests of the complainant and/or the student complained about, it may be necessary for interim action to be taken, pending the outcome of the investigation. This may include making arrangements to limit contact between the parties concerned.

Action by the Dean, Home Bursar or Academic Director in cases raising serious concerns, but where no formal complaint is made

If the Dean, Home Bursar or Academic Director are aware of a situation arising which is serious, but where no formal complaint has been made, they may still investigate this. Any decision to do so will be made following consultation with other senior members of the Student/Staff Welfare and Equalities Committee.

17) There may be circumstances in which an aggrieved party is not willing, or able, to make a formal complaint but the Academic Director/Home Bursar/Dean considers that the implications for the aggrieved person or others actually or potentially affected are serious. This may include cases where other parties, but not the aggrieved party, have made a complaint. In this case, having consulted with two other senior members of the Student/Staff Welfare and Equalities Committee, the Dean, Academic Director or Home Bursar may initiate an investigation and make a decision on further action on the basis of such evidence as is available.

Investigation

Depending on the outcome of the initial investigation, an impartial investigator may be appointed to carry out a formal investigation. This will be concluded as soon as possible

32) The purpose of an investigation is to establish the relevant factual evidence in connection with the allegation(s) made by the complainant.

33) The Dean will appoint an investigator who has had no previous involvement with the case, or with the parties to the case: the Investigator may be from another college.

34) The procedure for an investigation will normally be as follows, but may be adapted by the Investigator to meet the needs of the case:-

a) The Investigator will meet the complainant to confirm the details of the complaint.

b) The complaint as clarified will be forwarded to the person complained against together with any other relevant material that the Investigator has.

c) The Investigator will interview, where reasonably practicable, individuals identified by the complainant as having relevant evidence.

d) The Investigator will meet the person complained against to hear their response to the complaint and any further evidence that has come to light.

e) The Investigator will interview, where reasonably practicable, individuals identified by the person complained against as having relevant evidence.

f) Having considered all the evidence, including any relevant documents, the Investigator will prepare a written report of their findings, in relation to which they may check relevant sections in draft with the parties before finalising.

g) The report will be forwarded to the Dean.

35) The investigation should be concluded as soon as is reasonably practicable. The Investigator will prepare a report and may, if specifically requested to do, make recommendations on possible courses of action.

36) The Dean and Academic Director will ensure that appropriate support is available to students and staff following an investigation.

Possible outcomes of a complaint

The Dean will write to the complainant and to the person who is being complained about, with the outcomes of the investigation. Possible outcomes include no further action; informal action including advice, training and ongoing monitoring, or a recommendation for formal disciplinary action.

- 18) Investigation of a formal written complaint of harassment may result in:
- a) Deciding that the alleged harasser should face disciplinary procedures
 - b) Taking actions in College, or recommending to a department/faculty actions to take, including making arrangements to limit contact between the parties concerned. The relevant College Officer, Head of House, or head of department will have responsibility for implementing and monitoring any actions.
 - c) Referring either or both parties to appropriate support services
 - d) Referring a case to the University, if it transpires that the alleged harassment did in fact take place outside of the college environment and within the University environment.
 - e) Taking no further action other than, where appropriate, implementing or suggesting steps that would help to restore reasonable relationships between the parties. This approach will usually be appropriate where the claim(s) of harassment are considered to be unfounded and where there is a continuing relationship between the parties
 - f) In rare cases disciplinary action may be instituted against the complainant if there is evidence that the complaint of harassment is unfounded and not made in good faith.

19) If the complainant is not satisfied with the outcome following the investigation of the formal written complaint, they may be able to appeal this decision using the College Complaints procedure / Conference of Colleges Appeals Tribunal if applicable or, if they have exhausted all mechanisms of appeal within College, apply to the Office of the Independent Adjudicator for Higher Education (OIA) for a review of the case. If applying to the OIA they must do so within three months of the date of the Completion of Procedures letter.

20) Following the outcome of the complaint, the Academic Director will take such action, including informing others, and arranging for support for all parties following the outcome, as may be appropriate in the circumstances.

Referrals

21) On occasion, complaints of harassment which should be considered under this Procedure may be made to other members of staff. In this situation, staff should explain the Procedure, and ask the complainant if they would like the case referred to the Academic Director, so that they can receive support from a trained staff member, or submit a formal written complaint to the Dean.

22) If a student does not wish to seek support and advice, or to make a complaint, or if there are queries about the procedure to be followed, staff can contact a Harassment Adviser or DSWSS for advice on a confidential basis¹¹.

Potentially criminal misconduct

23) This Procedure may not be applicable where the allegations are of behaviours that may attract criminal sanction. This would include, but not be limited to, cases of serious assault or threat of assault. Where the complaint is of potentially serious criminal behaviour by a student, the college should consider whether it would be appropriate for the University to investigate, given the University's access to experienced external investigators. Further guidance on cases of sexual assault and sexual violence, including support available, is available from the University at www.admin.ox.ac.uk/eop/harassmentadvice/policyandprocedure/guidance/. Issues

including but not limited to those around teaching, examinations and accommodation/social activity may need to be considered.

24) Support for any student affected by such an incident may be sought from the Harassment Advisors and other relevant College Officers.

25) In addition the Academic Director will consider whether it is appropriate to make recommendations to appropriate bodies regarding arrangements that would have the purpose of limiting contact between students for so long as may be considered reasonably necessary.

Confidentiality

26) Information concerning allegations of harassment must so far as reasonably possible be held in confidence by those to whom it is divulged. Unnecessary disclosure of such allegations may attract disciplinary sanction. Information will be shared on a need-to-know basis. Once a formal complaint is pursued, it is likely to be appropriate and/or necessary for certain information to be provided to others within the College, the University, or to external bodies.

27) Those to whom disclosure may be made outside the University include the police, the Office of the Independent Adjudicator (“OIA”) and the civil and criminal courts. The College will not normally report a matter to the police without the complainant’s agreement, except in those rare circumstances where there is sufficient evidence to suggest that an individual poses an extreme risk.

Records

28) The College and all those involved in this Procedure must comply with the principles of the Data Protection Act 1998¹². These include ensuring that personal data is kept accurate and up-to-date, held securely, and not kept for longer than necessary.

29) Those interviewed in the course of any investigation by the investigator will be asked to review the notes of their individual discussions with the investigator as soon as is reasonably possible in order to comment on any inaccuracies or omissions. All notes will be preserved during the process and until such time as the College's internal processes and any external processes are concluded.

30) The Academic Director should be consulted by the Investigator about filing and retaining any notes and documents related to this Procedure, all of which must be held in confidence.
