

Policy on unacceptable behaviour, harassment and sexual misconduct together with the process

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Scope

This policy sets out SRMC commitment to protecting students and staff from unacceptable behaviour, harassment and sexual misconduct and applies to all members of SRMC under UK Partner programmes, including current students, staff, contractors, suppliers and visitors, in compliance with SRMC, UK Partners and the Office of Students E6 condition.

Purpose

The main purpose of this policy is to educate both students and staff in the prevention of all forms of unacceptable behaviour, harassment, and sexual misconduct plus ensuring a single source of information, and that process and procedure are clearly outlined in the event of any such act occurring.

SRMC is fully committed to providing a positive experience for all students and staff, where everyone is treated with courtesy and consideration and where differences are valued and diversity respected. All students and staff have the right to live, study, work and relax in an environment where they feel safe and protected.

SRMC supports the promotion of a culture where the whole community works towards having an environment where unacceptable behaviour, harassment and sexual misconduct, in all forms, is not tolerated and ensuring that there are arrangements in place to listen to and support all students and staff who experience it. Support will be offered to both the Reporting Party and the Responding Party.

Expectations

SRMC expects the highest standards of behaviour from all members of the SRMC community, whether on SRMC premises, while undertaking SRMC activities externally, its online platforms including Virtual Learning Environment e.g. Blackboard and SRMC social media accounts in line with the SRMC Student Handbook. All members should be aware of their own behaviour and how it impacts others. This policy sets out the standards of behaviour expected from students and staff, guidance on what is and what is not acceptable and how unacceptable behaviour will be dealt with.

Members of the SRMC recognise the significant impact of all experiences of unacceptable behaviour, harassment and sexual misconduct and acknowledge the potential detrimental impact it may have on a person's wellbeing, studies and employment, regardless of when the experience occurred.

Members of the SRMC will respond to all reports received in relation to unacceptable behaviour, harassment or sexual misconduct. Whilst recognising that some experiences may constitute a criminal offence, we will ensure that, in all cases, reports are carefully and sensitively managed by relevant staff members through a transparent process with clear communications. SRMC will also respect the right of the individual disclosing an incident to choose how to take forward a disclosure.

In exceptional circumstances, however, where there is a serious criminal offence and/or there is significant risk to the individual or our community, SRMC may report the matter to the police and/or may investigate it internally. In such instances the SRMC would always keep the individual fully informed of the proposed action to be taken before doing so. In some circumstances, it may be necessary for SRMC to progress a reported incident even if the staff member or student wishes to withdraw from the formal process.

Timescales

The SRMC normally expects allegations of unacceptable behaviour, harassment and sexual misconduct within 3 months of the incident taking place to allow for the most effective investigation to take place. However, the SRMC recognises that there may be circumstances where it may take longer for a student or staff member to disclose an incident. Where a disclosure is received more than 3 months from the date the incident is alleged to have taken place; the disclosure will be taken seriously and where possible, reasonable attempts will be made to obtain relevant information to determine the appropriate response.

Where disclosures are made which fall within the scope of this policy, they will be dealt within a timely manner. Where it may be necessary for matters to be referred to the SRMC Student or Staff Disciplinary Procedure, the timescales set out therein will apply as far as it is reasonable and possible to do so.

Monitoring and continuous improvement

SRMC will annually evaluate the effectiveness of this policy through the college's internal review process.

Definitions

The definitions listed below are there to inform the reader's understanding of both the SRMC perspective and / or drawn on statutory definitions.

The SRMC also recognises that there are potentially additional types of behaviour that will constitute a breach of this policy and may be considered under any other relevant internal disciplinary policies and regulations.

Reporting Party is the person who is making an allegation or complaint against another person.

Responding Party is the person who the allegation or complaint is made against

What is unacceptable behaviour, harassment and sexual misconduct?

Unacceptable behaviour may involve actions, words or physical gestures that could reasonably be perceived to be the cause of another person's distress or discomfort. This behaviour does not necessarily have to be face-to-face, and may take many forms such as written, telephone, text or email communications, or on social media. Some examples are included below, but this list is by no means exhaustive:

- Violent, aggressive, or abusive behaviour, such as shouting or personal insults
- Spreading malicious rumours or gossip
- Threats of or actual physical violence
- Offensive or indecent comments or body language
- Displaying offensive material or graffiti relating to an individual
- Innuendo or spreading gossip based on sexual orientation or gender identity
- Inappropriate initiation or 'hazing' ceremonies for sports teams or other societies
- Using social or other on-line media to harass or communicate harassing statements about students or staff
- Creating a hostile environment through comments about, for example, race, disability, sex, sexual orientation or gender identity.
- Victimisation, treating someone badly because they have made a complaint about discrimination.

Harassment: SRMC adopts the definition of harassment under the Equality Act 2010 and Protection from Harassment Act 1997 (only applicable to the UK). The Equality Act 2010 section 26 defines harassment as:

'harassment, including sexual harassment, includes unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics: age; disability; gender reassignment; race; religion or belief; sex; and sexual orientation.'

The Protection from Harassment Act 1997 defines harassment as:

'a course of conduct conducted on at least two occasions that harasses one other person, or a course of conduct that harasses two or more persons at least once each. References to harassing a person include alarming the person or causing the person distress.'

For students the SRMC adopts the test to be applied in determining harassment used by the Courts and recommended by the Office for Students. Staff should refer to the Staff Handbook.

Test (for students only)

Whether conduct is considered as 'harassment', SRMC will consider:

1. The perception of the person who is at the receiving end of the conduct;
2. The other circumstances of the case; and
3. Whether it is reasonable for the conduct to have that effect.

What Does This Mean?

Test

1. Perception of the person who is receiving the conduct

This is a subjective test and depends on whether the individual themselves regard the conduct as violating their dignity or creating an intimidating environment for them.

2. Other circumstances of the case

The University will take into account relevant circumstances of the case. This can include the personal circumstances of the person on the receiving end of the conduct, their health (including mental health), mental capacity; cultural norms; or previous experience of harassment.

3. Whether it is reasonable for the conduct to have that effect

This is an objective test. It is based on the principle about whether another person would reasonably consider the conduct to be unacceptable. Where this is not found to be the case, it is unlikely that such conduct would be considered to satisfy a finding of 'unwanted conduct'.

Sexual misconduct refers to a range of inappropriate and unwanted behaviours and offences of a sexual nature. It covers all forms of sexual violence, including but not limited to,

- Intimate partner violence
- Coercive controlling behaviour
- Stalking
- Non-consensual sexual touching (including groping)
- Sexual harassment (unwanted behaviour of a sexual nature which violates a person's personal boundary, dignity and consent; makes them feel intimidated, degraded or humiliated or creates a hostile or offensive environment)
- Abusive or degrading remarks of a sexual nature

- Distributing private and personal explicit images or video footage of an individual without their consent (as defined by the Criminal Justice and Courts Act 2025)
- Sexual Assault ([as defined by the Sexual Offences Act 2003](#))
- Rape ([as defined by the Sexual Offences Act 2003](#)).

Sexual misconduct is a serious public health issue within society and is not specific to higher education, but evidence suggests disclosures by the student community are increasing.

Sexual misconduct is known to have significant negative effects on a student's mental health and well-being and can have long lasting impact on their sense of safety within the SRMC and external environment. It can also impact their academic progress. We use a whole-University approach to ensure staff and students feel safe, valued and respected and will work towards having an environment where sexual misconduct, in all forms, will be eliminated. SRMC is committed to supporting anyone making a disclosure as well as anyone receiving the disclosure and take all disclosures seriously.

Incidents of sexual misconduct and violence also constitute a criminal offence under English law. Such incidents may be addressed through criminal proceedings, internal disciplinary proceedings, or in some cases, both.

Relationship abuse: a pattern of abusive and/or coercive behaviours (such as threats, isolation and intimidation) used to incite fear, maintain power and control over a former or current intimate partner or family members. Relationship abuse can be perpetrated by people who are 'personally connected' including partners/former partners, family members and people sharing responsibility of a child.

The abuse can be:

- Emotional
- Financial
- Sexual
- Physical
- Psychological
- Forced marriage
- Female genital mutilation

Coercive and Controlling behaviour: a form of domestic abuse and an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten the person. This controlling behaviour is designed to make a person dependent by isolating them from support, exploiting them, depriving them of independence and regulating their everyday behaviour.

Consent of sexual activities is when all people agree to and are comfortable engaging in the behaviour, there is mutual consent; both parties must be free to, and have the capacity to, make this choice.

- Capacity to consent: Free consent cannot be given if the individual does not have the capacity to give consent. Incapacitation occurs when an individual is asleep, unconscious, semi-conscious, or in a state of intermittent consciousness, or any other state of unawareness that a sexual act may be occurring. Incapacitation may also occur on account of a mental or developmental disability, or as the result of alcohol or drug use.
- Alcohol and/or Drug Use: Incapacitation arising from alcohol or drug consumption should be evaluated on the basis of how the alcohol/drugs have affected the individual; signs of incapacitation may include, but are not limited to, one or more of the following: slurred speech, unsteady gait, bloodshot eyes, dilated pupils, unusual behaviour, blacking out, a lack of full control over physical movements, a lack of awareness of circumstances or surroundings, and/or an inability to communicate effectively. Intoxication is never a defence for committing an act of sexual violence and misconduct, or for failing to obtain consent. If there is any doubt as to the level or extent of one's own or the other individual's capacity to consent, the safest approach is to not engage in a sexual act.
- Consent videos: It is important that individuals understand consent. Here are three videos explaining consent.

[Consent - Cup of Tea](#)

[Consent - Can I wear your hat?](#)

[F.R.I.E.S. What is Consent](#)

Further information about consent is available [here](#).

Unwanted conduct is conduct which is 'unwelcomed' or 'uninvited'.

It covers a wide range of behaviour. It can include:

- spoken words
- written words
- banter
- posts or contact on social media
- imagery
- graffiti
- physical gestures
- facial expressions
- mimicry
- jokes or pranks
- acts affecting a person's surroundings
- aggression
- physical behaviour towards a person or their property.

This list is illustrative and not exhaustive examples of unwanted conduct.

What Does Unwanted Conduct Mean?

It is not necessary for a person to say that they object to the conduct for it to be unwanted.

The person's objection will be considered in the determination of whether conduct is unwanted together with whether it is reasonable for the conduct to have that effect on the person.

Unwanted conduct amounts to harassment if the unwanted conduct has the effect of creating an intimidating, hostile, degrading, humiliating or offensive atmosphere.

For example, where conduct violates a person's dignity it will be considered as unwanted conduct.

Bystander intervention

Bystander intervention is when someone witnesses an event and steps in to stop harm before it happens, ensuring their own safety at all times. Unlike a **passive** bystander who takes no action, an **active** bystander chooses to challenge inappropriate or threatening behaviour.

For further information please view : [Be an Active Bystander - Stand Up & Step In](#)

The college's goal is to work towards educating staff and students to help prevent events or situations of unwanted behaviours occurring and to enable them to feel confident in addressing a situation if it does, and that they are supported if they do report or intervene.

This is in line with the SRMC's mandatory training for students and staff.

Complicity is defined as any act that knowingly helps, promotes, or encourages someone else to behave inappropriately or illegally.

Vexatious reporting involves the persistent and repetitive reporting of allegations, which are unsubstantiated, without merit, frivolous, unreasonable and unwarranted.

Malicious reporting occurs when an individual makes allegations that they know lacks a basis in fact, is inaccurate or misleading, that is made recklessly, or knowingly or deliberately for the purpose of undue advantage or causing harm to a person or the SRMC.

Behaviour towards others

In line with the SRMC Student Handbook and the SRMC Staff Handbook expect:

All SRMC staff, students and visitors should be treated with courtesy, and respect everyone's right to work, study and live in a safe, secure environment, free from anxiety, fear, intimidation and harassment.

Everyone should behave in a manner compatible with the College's code of conduct and not discriminate or harass anyone based on their age, disability, gender re-assignment, marital status, pregnancy, race, religion or belief, sex or sexual orientation.

No-one should use abusive, threatening or violent language or behaviour in person or through the SRMC's online platforms, or by email, texts or social media.

Staff / Student relationships

SRMC is committed to ensuring that any relationship between staff and students are professional and have boundaries. In line with this approach and in the interest of both staff and students, SRMC strongly discourages intimate personal relationships between a member of staff and a student due to the power imbalance which make personal relationships potentially vulnerable to exploitation. This power imbalance can also generate real or perceived inequalities, not only involving the people concerned, but also affecting other members of the College, whether students or staff.

SRMC expects all staff members and students to disclose if they have any personal and/or intimate personal relationships, including the nature of the relationship in accordance with the policy.

Where a staff member's behaviour is not in accordance with expected standards, this will be managed under the guidelines provided in the SRMC Staff Handbook.

PROCESS

Reporting unacceptable behaviour, harassment or sexual misconduct

Any form of unacceptable behaviour, harassment, or sexual misconduct can have a significant negative impact on an individual. If someone has experienced or witnessed any such behaviour that makes them feel uncomfortable, they should report it – this can be to the College or external agencies (e.g. the Police) or both.

In an emergency, where there is an immediate risk to life or a threat of violence, call 999.

This can apply to both students reporting about other students or staff, and staff members reporting about other staff or students.

Any reporting that involves a visitor will be investigated within the capabilities of SRMC. As certain actions are outside the controls or remit of SRMC, the College has limited ability to take action in respect of a visitor but will fully support any individual that experiences any form of unacceptable behaviour, harassment or sexual misconduct and will take action where this is appropriate and available.

SRMC encourages and supports all individuals in reporting unacceptable behaviour.

There are multiple reporting pathways to accommodate different circumstances and preferences – see ‘Reporting Options’.

Where students’ behaviour is not in accordance with the expected standards, this will be managed under the Student Disciplinary Regulations.

Where staff members’ behaviour is not in accordance with the expected standards, this will be managed under the Staff Disciplinary Procedure.

The College will take appropriate action in relation to any vexatious or malicious allegations in line with the relevant student and staff disciplinary policies.

Confidentiality

SRMC recognises the importance of keeping reports made under this policy confidentially. The College will only share any information which is disclosed to it on a ‘need-to-know’ basis. However, all parties should note that ‘confidential’ may not mean that the information that is reported to us will be kept a secret. For example, it may be necessary for the University to share all, or some, of the information that is reported with other people within our university, or in some exceptional circumstances, with external organisations such as the police.

The College will always consider which elements of the information provided is necessary to be shared with different teams within the University.

The College will normally inform those providing such information when it needs to be shared between different teams, to enable the University to offer support and investigate the concerns raised. This will be undertaken using the following principles:

Sharing the information is necessary to allow a case to be appropriately investigated and considered.

Sharing the information will allow us to safeguard the individual and potentially other members of their household e.g. children and/or other members of the College community.

Sharing the information will allow us to provide support to those who have reported sexual misconduct, and/or to those who have been alleged to have committed sexual misconduct.

Sharing the information will allow us to meet our legal duties.

Wherever possible, the college will advise those providing the information of who information has/will be shared with and the reasons for this.

Reporting Options

There are various ways you can report, informally or formally:

Informal – This is when the College is informed of what has happened, but the Reporting Party does not want formal action to be taken or where it is more appropriate to resolve a concern informally. However, some incidents of sexual misconduct and violence may also constitute a criminal offence under Singapore law. Such incidents may be addressed through criminal proceedings, internal disciplinary proceedings, or in some cases, both. In some circumstances the College may decide to formally manage a concern where the student or staff member would prefer a different approach when there is significant risk to the College or our community.

Formal – This is when the College has been informed of what has happened, and formal action is required to be taken.

Reporting Party	Informal Reporting	Formal Reporting	Anonymous Reporting	Support
Students	Student Union 'Report Concern' Students Complaints Procedure (Stage 1)	Student Complaints Procedure (Stage 2)	Can trigger wider safeguarding reviews or pattern recognition, but direct action may be limited unless sufficient information is provided.	Student Union
Staff	Line Manager HR Executive 'Report Concern'	Staff Grievance Policy	Can contribute to trend analysis and wider safeguarding interventions but may not result in individual action without identifiable details.	Line Manager HR Partner/Senior HR Partner Head of College Administration (if a complaint relates to a student)
Bystanders	Confidential advice from Student Welfare or HR	Support to assist affected individuals with reporting	Information only but may inform targeted awareness campaigns or proactive prevention measures.	Management Committee Directors

Making a disclosure

Making any type of disclosure can be hard, so it is important that the Reporting Party understand that they will be supported throughout the process and what the next steps would be.

For Students:

Students will be supported by the college's Counsellor in the Student Services team.

SRMC will provide tailored support to:

- Students who report unacceptable behaviour, harassment or sexual misconduct (Reporting Party)

- *Students accused of unacceptable behaviour, harassment or sexual misconduct (Responding Party)*
- *Witnesses or others affected.*

When there is an allegation made against another student, contractor or visitor students can report by speaking with the college's Counsellor, or to make an anonymous feedback through the feedback form.

Formal complaint: *Students will be contacted via the College Administration who will inform you of the required evidence together with the stages of the Complaints Procedure. Students can contact the college Counsellor for support with completing complaint documentation or navigating the process.*

Other communications *(via face to face, telephone, email or third-party notification): All reports (with the exception of student reporting about a staff member) will be sent to the Student Services Team who will contact the Reporting Party within 2 working days of receiving a report either from the student or via a third party. They will discuss which immediate support options are available, both internal and external, and how the Reporting Party wishes to take the report further (informally or formally). They will support the Reporting Party through the whole process.*

If required, in acknowledgement of the emotional impact such experiences can have, the appropriate team can also support students by providing a supportive letter, so they do not have to provide details in support of an extenuating circumstances claim. In addition, if applicable, they can also assist with any move required in university student accommodation.

Whilst an investigation is ongoing, the College would expect confidentiality to be maintained by all parties until an outcome has been reached.

If students are unsure which route to take, they can seek advice from the college Counsellor.

For Staff

Staff will be supported by their line manager (or appropriate senior manager) with guidance from the HR department.

Providing information to support a case

The College recognises how difficult it may be for the Reporting Party to share details of what has happened. SRMC will work with the Reporting Party to identify the most appropriate route for them to share this information, so that the College can understand and gather as much information as required about the incident in order to manage this appropriately.

Investigation Procedures

Investigations will be thorough, impartial, confidential, sensitive, and timely. They will include evidence gathering, witness interviews, careful analysis, and clear communication with all involved parties.

For students the College aims to complete initial assessment of reports within 5 working days and investigations within 30 working days. If an investigation will take longer, all parties will be informed of the reason for the delay and the expected completion date.

The College understands the importance that all parties (Reporting and Responding) are regularly kept up to date with the progress of the investigations, which will be actioned in a timely manner and both parties will be offered support throughout the process.

- *All parties will have an equal opportunity to present their evidence and respond to the allegations*
- *Be permitted to bring a supporter to the meetings*
- *Receive written communications and explanation of the decision taken.*

Outcomes or sanctions and how these will be shared

Where students' behaviour is not in accordance with the expected standards, this will be managed in accordance SRMC's student code of conduct.

Where staff members' behaviour is not in accordance with the expected standards, this will be managed under the Staff code of conduct.

If substantiated, this may result in formal action up to, and including, expulsion or dismissal.

The college will take appropriate action for any vexatious or malicious allegations in line with the relevant staff and student disciplinary policies.

Outcomes will be proportionate and aligned to the severity and impact of the misconduct:

- **Informal Resolutions:** *Mediation, behavioural contracts, informal warnings.*
- **Formal Disciplinary Actions:** *Documented warnings, suspension, expulsion (students), dismissal (staff).*
- **Criminal Proceedings:** *Immediate police referral and cooperation with criminal investigations in serious incidents.*

For Students:

*For **informal** disclosures the College will discuss with the Reporting Party what action they would expect in relation to the Responding Party. However, this would depend on the nature of the disclosure.*

This could be:

- *Offer of mediation between both parties concerned (both parties need to be in agreement)*
- *A member of staff to discuss and manage the concern raised with the Responding Party*
- *No further action to be taken*
- *Move to a formal complaint if informal action has not resolved the concerns.*

*For a **formal complaint** this would follow the Student Complaints Procedure.*

For a report submitted by a student where the alleged behaviour is about a member of staff, this would be managed in accordance with the Staff code of conduct.

In cases of sexual misconduct: At the conclusion of the investigation the investigator will confirm whether, on the balance of probabilities and having considered all the evidence, it is their finding that sexual misconduct has or has not taken place, and the broad reasons for this. If sexual misconduct has been found, the investigator will make recommendations about any appropriate remedial or disciplinary process and about any ongoing precautionary measures that may need to be implemented.

Where the student has breached the Student Code of Conduct, at the end of the investigation, the investigator or Panel will confirm whether, on the balance of probabilities and having considered all the evidence, it is their finding that sexual misconduct has or has not taken place and the broad reasons for this. If sexual misconduct has been found, the investigator or Panel will agree which penalties will be applied. The investigator or Panel will agree to the appropriate penalties based on a full consideration of the details of the case and considering any mitigating factors or precedents set.

The University will provide as much information as possible to the Reporting Party at all stages of the investigation. This will include letting them know about any relevant precautionary measures that have been put in place and, if they have submitted a formal complaint, the approximate date that the investigation will be concluded.

The College will advise of the broad findings of the investigation, the outcome (i.e., whether or not the investigation has concluded that sexual misconduct has or has not taken place) and the broad reasons why this has been found. The College will advise Reporting Party regarding any ongoing and relevant precautionary measures.

Given that some elements of the investigation may include information that is very personal to other individuals named in the complaint, the University may not be able to disclose the full details of all aspects of the investigation, and may not be able to provide full details of any disciplinary penalties that have been issued, or any further disciplinary processes that may be taking place once a complaint has concluded. The Reporting Party will be informed of the outcome of the investigation.

Police Investigation

If a student is subject to a police investigation the College may or will:

- *Pause its own investigation until police proceedings have concluded. The College would expect the student to keep the College informed at all times or give consent for the police to disclose progress of their proceedings.*
- *Implement precautionary measures for the duration of an investigation.*
- *Continue to offer support services to both parties throughout the investigation.*
- *Resume its own procedures once the police action or if relevant court proceedings conclude, regardless of outcome.*

All relevant parties will be kept informed.

For Staff:

Any action taken will be in accordance with the Staff Code of Conduct.

Possible outcome:

Possible outcomes following a disciplinary hearing may be:

- *Informal resolution through initial action*
- *A formal disciplinary sanction e.g. a written warning*
- *Dismissal*

Any action taken will be confirmed in writing and where formal action has been taken, employees will have the right of appeal.

Precautionary Measures

Any precautionary measure taken by the College will be reasonable and proportionate and, in all cases, care will be taken to minimise any disruption to students' ability to engage with their learning and assessment as far as is deemed possible, or a staff member's right to natural justice and dignity at work.

For example, precautionary measures may include temporary reassignment of teaching responsibilities, changes to timetables, or temporary suspension. However, such measures do not presume guilt and will be implemented with the minimum disruption necessary to ensure safety and wellbeing of all parties.

Appendix A

Support

There is a wide variety of support available to both students and staff.

Who	Support	Detail
Counselling Services (SRMC)	Confidential support for emotional and mental health needs	By appointment through Student Services
HR Department (SRMC)	Advice and support for staff workplace concerns	HR office or hr@srmc.edu.sg
AWARE Sexual Assault Care Centre	Specialist support for survivors of sexual assault and harassment	Helpline: 6779 0282
Samaritans of Singapore (SOS)	Suicide prevention and emotional support, 24/7	Helpline: 1767
Singapore Police Force	Emergency response and protection	Dial 999
IMH (Institute of Mental Health)	24/7 crisis helpline for urgent psychological distress	Helpline: 6389 2222
Hospitals & Crisis Centres	Medical treatment and forensic services after assault	Nearest A&E Department