# University of Westminster Diversity and Dignity at Work and Study Policy

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# Supersedes all previous versions:

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Wellbeing, Student and Academic Services

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and Student Experience Committee.

EDI Committee (recommend): 25 April 2025

Governance and Nominations Committee (consulted): 14 May 2025

# Section 1: Diversity and Dignity at Work and Study Policy

# 1.1 Introduction

We are a University where discoveries are made, barriers are broken, diversity is celebrated and where everyone is welcome. We are seeking to make the world a more inclusive, sustainable, better and healthier place through our educational, research and knowledge exchange endeavours.

Our values: Progressive, Compassionate and Responsible support this purpose. Living these values will create a positive and safe place with a culture that allows all members of the University community to be themselves, and to feel proud of being a part of the University of Westminster.

#### 1.2 Statement of Intent

At the University of Westminster, diversity, inclusion and equality of opportunity are at the core of how we engage with students, colleagues, applicants, visitors and all our stakeholders. We are fully committed to enabling a supportive and safe learning and working environment where everyone is treated with dignity and respect and which is equitable, diverse and inclusive, is based on mutual respect and trust, and in which bullying, harassment, sexual misconduct, discrimination and victimisation are neither tolerated nor acceptable. Relevant definitions can be found in Appendix 1.

This will support colleagues and students to reach their full potential, regardless of their age, disability, sex, gender identity, marital/civil partnership status, pregnancy and maternity, race, religion or belief, sexual orientation, ethnic or national origins, family circumstances, nationality, political beliefs and affiliations, socio-economic background, or other irrelevant distinction.

# 1.3 Purpose and Scope

# 1.3.1 Purpose

The Diversity and Dignity at Work and Study policy supports the University's commitment to diversity, inclusion, equity and equality of opportunity and protects the wellbeing of all members of the University. The Policy also sets out the University's position on bullying, harassment, sexual misconduct, unlawful discrimination and victimisation, and provides a framework for students and colleagues to understand the routes by which concerns and complaints about such matters may be raised and resolution sought. See Appendix 2 for further information.

## 1.3.2 Scope

This Policy covers work and study-related activities including extra-curricular activities and events at all University of Westminster sites and off site, including overseas, as part of the normal working and learning environment.

The behaviours and responsibilities set out in this Policy apply to the following members of the University community:

- All University colleagues, including visiting colleagues (the term "colleague" is the University's preferred term to describe its employees)
- Colleagues from other institutions on placement at or visiting the University.
- All students, including visiting and placement students and alumni
- Governors of the University
- Contractors working at the University
- Individuals representing, working or acting on the University's behalf (including suppliers)
- Colleagues working within or for the University of Westminster Students' Union (UWSU)
- Colleagues of University of Westminster subsidiaries

Further information can be found in the Colleague and Student Codes of Conduct.

The principles of the statement of intent extend to expectations of visitors and external users of the University's premises and others in the Westminster community.

# 1.4 Training and Awareness

The University will ensure appropriate professional development opportunities are provided for colleagues, to raise awareness of expected behaviours that demonstrate understanding of diversity and dignity at work and study, and act in supportive and compassionate ways towards all members of the University community. This training and awareness building will support individuals to develop competency to respond to issues that may need to be addressed. This will include universal and role specific training on relevant topics.

In order for this policy to be fair and effective, the whole University community should be aware of it and embed its principles in their interactions with one another.

New colleagues will be made aware of this policy via the University induction and through the mandatory e-learning courses that all colleagues complete. The policy will also be sent to all colleagues and new and continuing students on an annual basis via our corporate communication channels. The policy will also be available on the University's website.

Contractors will be made aware of this policy and any subsequent updates via existing regular monitoring meetings.

# 1.5 Responsibilities

The responsibilities with respect to this Policy are laid out below.

#### 1.5.1 Individuals

It is the duty of all members of the University community (including those listed in section 1.3.2) to comply with both the letter and spirit of the Diversity and Dignity at Work and Study Policy. Members of the University community should ensure that their behaviour towards others is not and could not in any way be considered as bullying, harassment, sexual misconduct, discrimination or victimisation.

Differences of attitude or culture and misinterpretation of social signals can mean that what is perceived as bullying or harassment or other unacceptable conduct by one person may not be apparent to another. It is important to be sensitive to the feelings and reactions of others.

Individuals will ensure that they:

- treat everyone with courtesy, respect and dignity and foster a supportive and inclusive environment
- embrace diversity and inclusion, promote and advance equality
- build and maintain excellent working relationships at all levels across the University
- consider the appropriateness of their behaviour and the effect it has on others and be prepared to adjust it if necessary, demonstrating sensitivity and respect to the views and needs of others. This is particularly important where individuals may be in a position of authority over others, including students
- participate in training and support the implementation of this Policy where appropriate
- challenge bullying, harassment, sexual misconduct, discrimination and victimisation as and when appropriate, or escalate their concerns to a more senior person, if they do not feel comfortable directly challenging others
- contribute to a stimulating learning and working environment which is supportive and fair, based on mutual respect and trust, and in which bullying, harassment, sexual misconduct, discrimination and victimisation are neither tolerated nor acceptable

#### 1.5.2 University Leaders and Managers

Leaders and Managers will additionally ensure that they:

- build on excellent relationships to foster effective and inclusive team working, modelling partnership working at all levels
- make every effort to ensure that bullying, harassment, sexual misconduct, unlawful discrimination and victimisation do not occur in work or study areas for which they are responsible

- sensitively and supportively respond to any colleague or student who alleges bullying, harassment, sexual misconduct, discrimination or victimisation and provide clear signposting of the correct procedures to follow and support available
- monitor whether any instances of victimisation or other retaliatory or unacceptable behaviour arise as a result of a complaint or grievance being made, and take steps to address such instances and/or behaviours.
- take early action when aware of unacceptable behaviour to address it before a complaint or grievance is made (which may be sufficient to address the behaviour)
- ensure that everyone including colleagues and students know how to raise issues of concern and are aware of the Diversity and Dignity at Work and Study Policy and sources of support
- create a stimulating learning and working environment which is supportive and fair, based on mutual respect and trust, and in which bullying, harassment, sexual misconduct, discrimination and victimisation are neither tolerated nor acceptable

# 1.5.3 The University

- will seek actively to advance and promote equality of opportunity, equity, diversity and inclusion, and strive to create an environment which is inclusive and supportive and free from bullying, harassment, sexual misconduct, unlawful discrimination and victimisation
- will not discriminate in the way it provides or procures services on behalf of the University
- will not unlawfully discriminate in the recruitment, promotion and management of colleagues or in the selection, admission and treatment of students
- will neither practice bullying, unlawful discrimination, harassment, or victimisation nor tolerate such conduct by colleagues or students and will act robustly to prevent and respond to sexual misconduct
- will not victimise any person who has complained of bullying, harassment, sexual misconduct or discrimination, or who has given information in connection with such a complaint or grievance
- will provide opportunities for reflection and enhancement of its approaches and policies in this area

# 1.6 Confidentiality

- Complaints or grievances about bullying, harassment, sexual misconduct, discrimination or victimisation will be considered in accordance with the provisions of the appropriate procedure or regulations set out in section 2 below, and should be treated confidentially by those involved in those procedures as required by those procedures and regulations as further described in this section.
- Appropriate confidentiality will normally be observed for both the person raising the complaint or grievance and any subject of that complaint/grievance. In this context, confidentiality relates to the process and its outcomes, details of the case and any investigations (including related

investigations). Witnesses are required to observe the same confidentiality provisions as all other parties. Only those who need to know details of the case will have access to information, including the reporting and responding parties. It should be noted that in the case of anonymous complaints or grievances, the extent to which procedure can progress may be limited. Observing confidentiality does not prevent those involved in the process or in a matter from seeking the advice of the People, Culture and Wellbeing Team (PCW), a trade union representative or UWSU representative or solicitor or from otherwise lawfully sharing information.

 During any formal procedure, evidence or statements provided by the complainant, any subject of the complaint or grievance and any witnesses may form part of the documentation, which is to be shared, as appropriate, for the purposes of completing that formal procedure. The information may also be used at a disciplinary hearing or employment tribunal and in the latter case could therefore become public.

In some circumstances, the University may disclose information relating to complaints or grievances, including where it is required by law or for the discharge of its duty of care. For example, in terms of duty of care, should a line manager learn about something that could seriously affect the wellbeing of an individual or group of colleagues, they may have a duty of care to seek advice from their People Business Partner or People Adviser, even if the person from whom they learned this information or who this information is about does not want it to be shared. The University will make such decisions based on the balance of its obligations and individuals' rights in each particular case. Any breaches of confidentiality may lead to disciplinary action in accordance with the appropriate procedure or regulation.

# 1.7 Malicious or vexatious complaints or grievances

Complaints or grievances of bullying, harassment, sexual misconduct, discrimination and victimisation are treated seriously by the University. If there is evidence that a complaint or grievance has been made vexatiously or maliciously or the complaint or grievance is deemed not of genuine substance by the investigating officer(s), a recommendation may be made that no further action be taken.

In the event that the complaint or grievance is deemed vexatious or malicious, appropriate disciplinary action may be taken.

Victimisation and retaliation as a result of action being taken under this Policy is unacceptable and may also lead to disciplinary action.

# 1.8 Sexual harassment against colleagues

In addition to the University's overarching commitment to treat everyone with dignity and respect and to eliminate all forms of bullying, harassment, sexual misconduct, discrimination and victimisation by or against all students and colleagues, the law places specific obligations on employers to take reasonable steps to prevent sexual harassment of workers in the course of their employment. Sexual harassment is defined in Appendix 1.

This duty extends to sexual harassment:

- in a work situation
- during any situation related to work such as at a social event with colleagues
- against a colleague or other person connected to the employer outside of a work situation, including on social media, or
- against anyone outside of a work situation where the incident is relevant to the alleged harasser's suitability to carry out the role.

Sexual harassment committed by colleagues may lead to disciplinary action up to and including dismissal. Aggravating factors such as abuse of power over a more junior colleague will be taken into account in deciding what disciplinary action to take. Sexual harassment committed by students may lead to action under the Student Disciplinary Regulations.

# 1.8.1 Harassment by third parties

The law also requires the University to take reasonable steps to prevent sexual harassment of our colleagues by third parties. Sexual harassment against a colleague by someone who does not work for and is not an agent of the University will not be tolerated. This will include harassment by: students, including visiting and placement students and alumni; colleagues from other institutions on placement at or visiting the University; contractors working at the University; colleagues working within or for the University of Westminster Students' Union (UWSU); and, any other individuals visiting the University.

The steps that the University will take to prevent such conduct, include risk assessment and strengthening of existing controls, to be kept under regular review, training on tackling sexual harassment in the workplace, increased awareness of expected standards of conduct, increased awareness of reporting channels and support available, refreshing relevant policies and procedures and making it clear that if sexual harassment occurs, steps that may be taken to address that conduct include colleague disciplinary action up to and including dismissal and/or equivalent sanctions for third parties as appropriate to their relationship with the University.

### 1.8.2 Reporting sexual harassment

Colleagues are encouraged to report sexual harassment by colleagues or third parties. Where such conduct is reported, the University will take appropriate steps to address the matter.

Where the alleged harassment is by a colleague, the matter should be raised under the Grievance Policy and Procedure. Where the alleged harassment is by a student, the Student Disciplinary Regulations will normally be invoked. Where the alleged harassment is by a third party (who is not a student), the matter should be raised in the first instance with the immediate line manager of the reporting colleague. The line manager will seek professional advice from the People Advisory Support Team about the most appropriate steps to address the matter.

# 1.9 Further support

Support is available to students and colleagues who raise, or who are the subject of a complaint or grievance in relation to the matters covered by this Policy, as follows:

#### For students:

- Student and Academic Services
- UWSU Advice Service
- Personal tutors
- Disability tutors
- UWSU affiliated Student Groups and Sports Clubs
- Student Centre and Student Hub
- Report and Support

# For Colleagues:

- Line manager
- Head of School or PS Director
- People, Culture and Wellbeing Team (PCW)
- Employee Assistance Programme
- Colleague Self-Referral Counselling provision
- Mediation provision
- UCU & Unison
- Colleague networks
- Report and Support

Further information / useful contacts are available on the <u>Report and Support</u> portal for colleagues and students.

# Section 2:

# Procedural framework that supports the Diversity and Dignity at Work and Study Policy

#### 2.1 Procedures

The following procedures are used to deal with alleged breaches of the Diversity and Dignity at Work and Study Policy promptly and fairly. Procedures are intended to deal with any alleged breach (whether minor, repeated or serious breaches) at the appropriate level with sensitivity and impartiality, both for those raising a complaint or grievance and any subject of that complaint/grievance.

| Reporting Person | Responding Person      | Appropriate procedure               |
|------------------|------------------------|-------------------------------------|
| Student          | Student                | Student Disciplinary<br>Regulations |
| Student          | University / Colleague | Student Complaints Procedure        |
| Colleague        | Student                | Student Disciplinary<br>Regulations |
| Colleague        | University / Colleague | Grievance Policy and Procedure      |

Where the relevant procedure listed above provides for an informal resolution stage, individuals may wish to consider such a route in the first instance and if appropriate to the circumstances. The University recognises that the informal resolution stage may not be appropriate for complaints of sexual misconduct or harassment.

For further guidance about the routes for raising and resolving issues and concerns, please see Appendix 2.

The University will provide opportunities for those involved in these procedures to reflect on their operation and provide feedback on their enhancement.

The University's relevant procedures listed above do not use the criminal standard of proof and outcomes are not legal judgements.

Where concerns raised involve third parties, for example, visitors and external users of the University's premises and others in the University community, cases that arise will be considered on a case-by-case basis using the most appropriate procedure.

# 2.2 Formal complaint or grievance

Any complaints or grievances made about bullying, harassment, sexual misconduct, discrimination or victimisation will be investigated thoroughly and without delay, according to the relevant procedures. A formal complaint or grievance should be made in accordance with the procedures or regulations identified in section 2.1.

# 2.3 Monitoring

PCW will maintain formal records in accordance with the requirements of the Data Protection Act 2018 (DPA) of all formal procedures relating to bullying, harassment, sexual misconduct, discrimination or victimisation by colleagues and report annually to UEB and the Court of Governors.

The University will undertake, disseminate and publish detailed annual equality and diversity monitoring reports relating to colleagues and students. Naturally, these reports will not identify any individual names or cases.

Quality and Standards will provide a report of casework considered under the Student Complaints Procedure and Student Disciplinary Regulations which is presented annually to Academic Council, and Court of Governors for monitoring purposes.

Records will be maintained in accordance with the University's Information Compliance, Records Management and Information Security Policies.

#### 2.4 Criminal offences

The procedures referenced in section 2.1 provide further detail on how the University will respond to matters which may constitute a criminal offence.

# **Appendix 1(a): Definitions and Examples**

#### Harassment

Harassment means any of the following:

# 1) Harassment (under the Equality Act 2010)

- Unwanted conduct related to a relevant protected characteristic\* which has
  the purpose or effect of violating another person's dignity or creating an
  intimidating, hostile, degrading, humiliating or offensive environment for that
  person.
- Unwanted conduct of a sexual nature which has the purpose or effect of violating another person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person (referred to in this Policy as 'sexual harassment').
- Unwanted conduct (by person A) of a sexual nature or conduct that is related
  to gender reassignment or sex which has the purpose or effect of violating
  another person's (person B's) dignity, or creating an intimidating, hostile,
  degrading, humiliating or offensive environment for B and, because of B's
  rejection of or submission to the conduct, A treats B less favourably than they
  would have been had B not rejected or submitted to the conduct.

\*The relevant protected characteristics are:

- age;
- disability;
- gender reassignment;
- race;
- religion or belief;
- sex;
- sexual orientation

# 2) Harassment (under the Protection From Harassment Act 1997)

Harassment arises where a person pursues a course of conduct\* which they know or ought to know amounts to harassment of another and which:

- harasses one other person on at least two occasions:
- or harasses two or more persons on at least one occasion in relation to each person.

<sup>\*</sup>Reference to a course of conduct includes speech and references to harassment of a person include alarming the person or causing the person distress.

The full text of Sections 1 and 7 of the Protection from Harassment Act 1997 is provided at Appendix 1b.

When applying the above definitions of harassment, the University will do so in a manner which is consistent with the freedom of speech principles as set out in the University's Code of Practice on Freedom of Speech. It will have particular regard to, and place significant weight on, the importance of freedom of speech within the law, academic freedom and tolerance for controversial views. There will also be a rebuttable presumption to the effect that students being exposed to any of the following is unlikely to amount to harassment for the purposes of this definition:

- a) the content of higher education course materials, including but not limited to books, videos, sound recordings, and pictures;
- b) statements made and views expressed by a person as part of teaching, research or discussions about any subject matter which is connected with the content of a higher education course.

#### **Sexual Misconduct**

Sexual misconduct means unwanted or attempted unwanted conduct of a sexual nature, which includes but is not limited to:

Sexual harassment;

Sexual assault; and

Rape.

For the purposes of applying this definition, a person will be deemed to have consented to conduct of a sexual nature if they have agreed by choice and have the freedom and capacity to make that choice.

#### **Victimisation**

Victimisation means subjecting someone to a detriment or otherwise treating them less favourably because they have made (or may make) an allegation or complaint or have otherwise raised (or may raise) a concern about the conduct of a colleague or student or other individual – for example, making a complaint of bullying or harassment or a report of sexual misconduct.

#### **Unlawful Discrimination**

Unlawful discrimination means less favourable treatment by the University under the Equality Act 2010 because of a protected characteristic (direct discrimination) and/or putting a rule or a policy or a way of doing things in place which has a greater negative impact on someone with a protected characteristic than someone without one (indirect discrimination).

For the purposes of unlawful discrimination under the Equality Act, the protected characteristics are as follows:

- for colleagues: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation; and
- for applicants and students: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

# **Bullying (including online bullying)**

Offensive, intimidating, malicious, hostile or insulting behaviour, including behaviour involving the misuse of power (whether or not a person is in a position of authority in relation to another), that has the purpose or effect of making a person feel vulnerable, upset, humiliated, undermined, intimidated, degraded or threatened. Bullying may be physical, verbal or non-verbal conduct.

# Difference between bullying and reasonable management

It is important to make the distinction between bullying and reasonable management. Bullying by its nature is unfair and can undermine a person's best efforts to perform well; bullying behaviour can be used by peers and subordinates as well as managers.

Reasonable management, on the other hand, may involve setting demanding – but fair and achievable – objectives and standards of behaviour appropriate to a colleague's job, grade, and level of responsibility. It is also important for line managers and/or those working with students to ensure that when it is necessary to address poor performance, give critical feedback, or take disciplinary action against a colleague or student, it is done fairly and constructively, and in full accordance with the University's values, procedures and guidance.

Vigorous academic debate and legitimate and reasonable management of colleagues and student performance must be distinguished from bullying.

# Microaggressions

Everyday verbal, non-verbal and environmental slights, snubs or insults, whether intentional or unintentional, which communicate hostile, derogatory or negative messages to target persons based solely upon their marginalised group membership, including (but not limited to):

# Casual/ 'off the cuff' remarks

- Inappropriate jokes
- Questions or comments that reveal assumptions based on stereotypes
- Questioning lived experience

# **Examples of unacceptable conduct**

The following lists provide non-exhaustive examples of conduct that may, depending on the circumstances, constitute harassment, sexual harassment, harassment for rejecting or submitting to sexual harassment and/or bullying as defined in this Appendix 1, whether occurring face-to-face, online (e.g. via electronic media such as email and social media or by phone/mobile) or otherwise.

#### Harassment:

- physical assault or the threat of violence
- verbal abuse, including threats, intimidation, derogatory name calling, insults, ridicule or belittling of an individual using "humour" to put another person or group of people down, for example, telling jokes relating to a relevant protected characteristic
- spreading malicious lies or making insulting comments (including relating to a relevant protected characteristic)
- display or circulation of abusive or offensive materials, whether online or offline, for example by email or on the internet, or on a whiteboard
- sending offensive text messages
- making unnecessary and/or degrading references to someone on the basis of a relevant protected characteristic
- ignoring or patronising an individual
- ostracism or exclusion from normal conversation in the work or study environment, or from work- or study-related social events
- coercion, such as pressure to subscribe to a particular political or religious belief
- intrusive behaviour such as the invasion of personal space, pestering, spying or stalking
- persistent, unwelcome contact including text messages, emails, phone calls, gifts
- deliberately undermining someone by spreading malicious lies, making insulting comments or bringing a vindictive allegation of unacceptable behaviour
- outing an LGBTQI+ individual without their express permission
- Deliberately misgendering transgender individuals such as refusing to use someone's preferred pronoun or continuing to use their former name ('deadnaming')

#### Sexual harassment

- unwanted physical contact (e.g. hugging, touching, kissing) sexual advances or innuendo
- sexual assault or rape
- asking a person intrusive questions about their private life
- making sexual remarks about someone's body, clothing or appearance
- telling sexually offensive jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment
- displaying or sharing pornographic or sexual images, or other sexual content

sending sexually explicit messages

# Harassment for rejecting or submitting to sexual harassment

- increasing someone's workload and/or being overly critical of their work, because they rejected/submitted to sexual harassment;
- blocking promotion or progression opportunities because they rejected/submitted to sexual harassment
- Ostracism or spreading rumours because they rejected/submitted to sexual harassment

# **Bullying:**

- psychological intimidation, humiliation, excessive and/or unreasonable criticism or fault-finding of an individual
- preventing an individual progressing by intentionally blocking promotion or training opportunities, unjustifiably restricting choice of study options or access to tuition
- unfair allocation of work and responsibilities or setting unreasonable objectives in work or study
- asserting a position of intellectual superiority in an aggressive, abusive or offensive manner whether orally or in writing, publicly or in private
- · preventing access to resources
- abuse of power or behaviour that causes fear or distress for others
- acting unreasonably by failing and refusing to listen, reflect and take appropriate account of the position or needs of other people

# Appendix 1(b):

# Protection from Harassment Act 1997 (definition of harassment and associated clauses)

#### Section 1:

- 1) A person must not pursue a course of conduct
  - a) which amounts to harassment of another, and
  - b) which he knows or ought to know amounts to harassment of the other.
- 1A) A person must not pursue a course of conduct
  - a) which involves harassment of two or more persons, and
  - b) which he knows or ought to know involves harassment of those persons, and
  - c) by which he intends to persuade any person (whether or not one of those mentioned above)—
    - <u>i.</u> not to do something that he is entitled or required to do, or
    - <u>ii.</u> to do something that he is not under any obligation to do.
- 2) For the purposes of this section or section 2A(2)(c), the person whose course of conduct is in question ought to know that it amounts to or involves harassment of another if a reasonable person in possession of the same information would think the course of conduct amounted to harassment of the other.
- 3) Subsection (1) or (1A) does not apply to a course of conduct if the person who pursued it shows
  - a) that it was pursued for the purpose of preventing or detecting crime,
  - b) that it was pursued under any enactment or rule of law or to comply with any condition or requirement imposed by any person under any enactment, or
  - c) that in the particular circumstances the pursuit of the course of conduct was reasonable.

#### Section 7:

- 1) This section applies for the interpretation of sections 1 to 5A.
- 2) References to harassing a person include alarming the person or causing the person distress.
- 3) A "course of conduct" must involve
  - a) in the case of conduct in relation to a single person (see section 1(1)), conduct on at least two occasions in relation to that person, or
  - b) in the case of conduct in relation to two or more persons (see section 1(1A)), conduct on at least one occasion in relation to each of those persons.

- 3A) A person's conduct on any occasion shall be taken, if aided, abetted, counselled or procured by another
  - a) to be conduct on that occasion of the other (as well as conduct of the person whose conduct it is); and
  - b) to be conduct in relation to which the other's knowledge and purpose, and what he ought to have known, are the same as they were in relation to what was contemplated or reasonably foreseeable at the time of the aiding, abetting, counselling or procuring.]
- 4) "Conduct" includes speech.
- 5) References to a person, in the context of the harassment of a person, are references to a person who is an individual.

# Appendix 2: Routes for raising and resolving issues and concerns

# For students:

| Status       | Example  | What student can expect  |
|--------------|--|--|
| A disclosure | e.g. a student tells a tutor<br>but does not provide<br>details that allow an<br>investigation to be<br>conducted  | Signposting to reporting platform  |
|              |  | Referral to the Student<br>Wellbeing team  |
|              |  | Signposting to external agencies (e.g. Police) and charity/support organisations as listed by Wellbeing and Counselling team |
| A report     | e.g. a student reports to<br>the University with details<br>of the incident (including<br>using Report and<br>Support) but does not<br>state what action they are<br>expecting | As above for a disclosure  |
|              |  | Access to specialist internal advice and support   |
|              |  | Liaison on academic or practical adjustments   |
|              |  | Advice on options (including making a complaint that the University can investigate)   |
| A complaint  | e.g. a student submits an account of the incident and confirms that they wish the University to take protective action and investigate   | Initiation of the Student complaints procedure and signposting to relevant support   |
|              |  | Consideration of immediate protective actions  |

# For colleagues:

| Status       | Example  | What colleague can expect   |
|--------------|--|---|
| A disclosure | e.g. a colleague tells another colleague or a manager about an alleged incident of inappropriate behaviour or conduct which potentially contravenes the Diversity and Dignity at Work and Study Policy, but does not provide details that allow an investigation to be conducted | Signposting to the Colleague Report and Support platform  Referral to the Employee Assistance Programme                     |
|              |  | (EAP) and other health and wellbeing support.   |
|              |  | Referral to line manager,<br>Head of School or PS<br>Director   |
|              |  | Referral to the People<br>Advisory Support Team   |
|              |  | Signposting to external agencies (e.g. Police)  |
| A report     | e.g. a colleague reports to the University with details of the incident (including using Report and Support) but does not state what action they are expecting   | As above for a disclosure  Access to specialist advice and support  |
|              |  | Liaison on any practical adjustments to make colleague feel as safe and as supported as possible                            |
|              |  | Advice on options (including making a formal complaint that the University can investigate through the grievance procedure) |
| A complaint  | e.g. a colleague submits a written account of the incident using the Statement of Grievance form and confirms that they wish the University to investigate   | Initiation of the Grievance procedure and signposting to relevant support   |
|              |  | Consideration of mitigation measures and/or precautionary conditions  |

# **Digital Accessibility**

We are committed to ensuring our websites and content is digitally accessible according to the Public Sector Bodies Accessibility Regulations (2018). This policy is published on our website; and can be requested in a range of formats e.g. Word, PDF, plain text, alternative formats such as large print or Braille.

To implement these guidelines, users are asked to access other digital information or systems. For information on the accessibility of this system, the University has published an accessibility statement for each system which outlines accessibility issues we're aware of and how we are working to address them. You can access this from the system. These guidelines relate to the following digital systems with the following levels of accessibility:

- Report + Support partially accessible Report + Support accessibility statement
- The University of Westminster website partially accessible University of Westminster website accessibility statement
- Microsoft partially accessible more on Microsoft accessibility (including support from the Microsoft Disability Answer Desk)

If you need an alternative to using the system to implement the guidelines, we will support you to do this:

- Students please contact Quality and Standards on academicstandards@westminster.ac.uk
- Colleagues please contact People Advisory Support or People Services on hr-services@westminster.ac.uk

This document has been designed to maximise usability - for example navigating by headings, meaningful hyperlinks, image descriptions, colour/contrast and display options such as magnification and reflow. Should you encounter an accessibility barrier:

- Students please report to Quality and Standards on academicstandards@westminster.ac.uk
- Colleagues please report to People Advisory Support or People Services on hr-services@westminster.ac.uk.