



**Higher Education Services
Sexual Misconduct, Bullying
& Harassment Policy**

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Higher Education Services Sexual Misconduct, Bullying & Harassment Policy

1.0 Introduction

1.1 FutureLearn is committed to protecting students from harm, power imbalances, harassment, and misconduct and maintaining a safe and supportive educational environment. While the student sexual misconduct, bullying and harassment policy applies specifically to students, staff to student, staff to staff and staff to third party behaviour will also be covered.

1.2 The policy should be read in conjunction with the following FutureLearn and partner university policies:

- [Pregnancy, Adoption & Family Leave Policy \(Students\)](#)
- [Religion & Belief Policy](#)
- [Code of Conduct & Procedure](#)
- [Student Complaints Policy](#)
- [Equality, Diversity and Inclusion \(EDI\) Policy](#)
- [Code of Practice on Freedom of Speech](#)
- [Student Disciplinary Procedure](#)
- [Safeguarding & Prevent Duty Policy](#)
- [Fitness to Study Policy](#)
- [Data Protection Policy - FutureLearn](#)

1.3 For students studying on OPM subcontractual partnership programmes, they should refer to the following policies:

- Brunel University [Harassment and sexual misconduct support | Brunel University of London](#)
- Roehampton University [Student Support | Sexual misconduct | University of Roehampton, London](#)

2.0 Legal Framework

2.1 This policy is grounded in the following UK laws and regulations:

- [Office for Students Condition E6](#)
- [Protection from Harassment Act 1997](#)
- [Equality Act 2010](#)
- [Education \(No.2\) Act 1986](#)
- [Higher Education and Research Act 2017](#)
- [Higher Education \(Freedom of Speech\) Act 2023](#)
- [Human Rights Act 1998 \(Article 10 ECHR\)](#)

2.2 FutureLearn does not use non-disclosure agreements in cases of sexual misconduct, bullying or harassment.

3.0 Definitions

3.1 Bullying may be characterised as offensive, intimidating, persistent malicious or insulting behaviour, including an abuse of power to undermine, humiliate or injure the recipient. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

3.2 Discrimination occurs when a person is treated less favourably for a reason related to a protected characteristic as defined by the [Equality Act 2010](#).

3.3 Harassment is unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment as defined by the [Equality Act 2010](#) and [Protection from Harassment Act 1997](#). This includes harassment by association or perception.

3.4 Sexual misconduct relates to all unwanted conduct of a sexual nature. This includes, but is not limited to:

3.4.1 Sexual harassment as defined by [Section 26\(2\) Equality Act 2010](#).

3.4.2 Assault as defined by the [Sexual Offences Act 2003](#).

3.4.3 Rape as defined by the [Sexual Offences Act 2003](#).

3.4.4 Physical unwanted sexual advances as set out by the Equality and Human Rights Commission: [Sexual harassment and the law, 2017](#).

3.4.5 Intimidation or promising resources or benefits in return for sexual favours as set out by the Equality and Human Rights Commission: [Sexual harassment and the law, 2017](#).

3.4.6 Distributing private and personal explicit images or video footage of an individual without their consent as defined by the [Criminal Justice and Courts Act 2015](#).

3.5 Victimisation occurs when a person is treated less favourably because they have asserted their rights to raise a complaint under this policy. This also applies to those who have acted as witnesses or supporters of individuals who have complained of harassment, bullying and/or sexual misconduct.

3.6 A bystander is an individual who may be a potential witness to sexual misconduct, bullying or harassment, as defined by the Office for Students under [Condition E6](#).

4.0 Scope

4.1 The policy applies to (albeit not limited to) students on higher education courses or programmes within the Higher Education Services Division, and who are registered with the Office for Students. It includes awareness of sexual misconduct, bullying and harassment for all students and relevant staff who may interact with students or potential applicant students.

4.2 The policy does not preclude individuals from seeking recourse through criminal or civil proceedings.

4.3 The policy applies equally to all students regardless of any protected characteristic.

4.4 The policy includes incidents taking place through any medium including the virtual learning environment, email and social media.

4.5 The policy outlines one source of information for individuals to be able to gain guidance and support on FutureLearn's approach to dealing with sexual misconduct, bullying and harassment.

5.0 Principles

5.1 FutureLearn commits to:

- Providing a safe environment for students, staff and third parties.

- Preventing and addressing sexual misconduct, bullying, and harassment.
- Ensuring that FutureLearn’s zero-tolerance position is communicated to all students and relevant staff.
- Protecting the dignity and rights of individuals.

5.2 Any disclosure is dealt with sensitively and all individuals involved are supported, including those who disclose an incident and those who are accused.

6.0 Governance

6.1 The Board of Directors takes full accountability and oversight of this policy and how FutureLearn tackles sexual misconduct, bullying and harassment. An annual report is received to the Board of Directors after consideration by the Academic Standards and Quality Committee. Quarterly reports will be received at the Student Engagement, Quality and Programme Committee.

6.2 The Managing Director is required to and authorised on behalf of the Board of Directors to appoint a Responsible Officer to act on the Board’s behalf to ensure compliance of the policy and its review. The Nominated Officer is the Director of Academic Affairs.

6.3 Amendments to this policy are submitted to the Student Engagement, Quality and Programme Committee for initial approval and receive confirmation through the Academic Quality and Standards Committee.

7.0 Confidentiality

7.1 Disclosures of harassment, bullying, or sexual misconduct will be dealt with using the appropriate level of confidentiality. Information will only be shared with those according to the data protection policy.

7.2 Should an individual have any objections to data sharing they must bring this to the attention of the investigating officer. The implications of withholding information will be discussed.

7.3 Where witnesses are interviewed confidentiality of the interview and investigation will be stressed and the process for any breaches explained leading to possible disciplinary action.

7.4 Individuals can make an anonymous disclosure however this may hinder investigations. To ensure a full and fair investigation transparency and openness of identity is encouraged.

8.0 Sexual Misconduct

8.1 FutureLearn has a zero-tolerance position on any form of sexual misconduct.

8.2 Where a disclosure of sexual misconduct is made the individual will be supported. FutureLearn will work with the individual to help them to define their experience using appropriate terminology. The individual’s needs will be considered as levels of trauma can vary.

8.3 Anyone can be affected by sexual misconduct, though certain factors, such as gender, age, sexual orientation, race, language, or disability may increase vulnerability and create obstacles to speaking up or getting help. FutureLearn is committed to removing these barriers by offering accessible ways to report concerns and by strengthening support for those who come forward. It also recognises its duty to assess risks and take steps to reduce the likelihood of sexual misconduct affecting students through policy, education and action.

9.0 Bullying and Harassment

9.1 FutureLearn has a zero-tolerance position on any form of bullying and harassment.

9.2 Bullying and harassment can take many forms. It may include aggressive behaviour, unwanted touching, or sexual advances, offensive banter or nicknames, exclusion from team or social activities. In today's digital age, cyberbullying is a growing concern where offensive messages or inappropriate comments via email or social media can be just as problematic.

9.3 It's important to remember that when defining bullying and harassment, it's not the intent, but the effect on the person at the receiving end that defines whether the behaviour constitutes harassment and that what may appear trivial to one person can be deeply harmful to another.

9.4 Bullying or harassment can leave individuals feeling isolated, anxious, and unsure of themselves. Victims may fear retaliation, worry about being seen as difficult, or doubt they will be believed, which can stop them speaking up. This can damage confidence and harm mental and physical health. It is vital to recognise these effects, respond with empathy, and provide clear, safe ways for people to report concerns and get help.

10.0 Bystanders

10.1 Bystanders are those who witness or know about inappropriate behaviour like bullying, harassment, or discrimination without being directly involved. Their position can be powerful, as their distance from the situation often helps them see it more clearly, think calmly, and act without the same emotional burden.

10.2 FutureLearn will educate students and staff on the bystander role and the three-step approach to reporting an incident of sexual misconduct, bullying and harassment to a line manager through the Report and Support form.

- Describe what is unacceptable about the behaviour.
- Explain the impact of the behaviour on oneself.
- Explain what the desired outcome would be and take control.

10.3 Bystanders have a moral obligation to support the individual affected, intervene in the moment and do so safely. Speak to the perpetrator privately and escalate issues when necessary.

11.0 How to Make a Disclosure

11.1 Students who have experienced sexual misconduct, bullying or harassment are required to complete the [Report and Support](#) form via FutureLearn's website, or speak directly to a member of Student Services. Students should raise any concern through this channel where the disclosure is based on student to student, student to third party (for example a guest speaker), or student to staff member.

11.2 A support officer will contact the student and discuss the disclosure offering support and guidance through FutureLearn's pastoral care and policies or supporting the student when making the disclosure through the partner university's process of Report and Share.

11.3 The support officer may also guide the student to external help as listed in [16.1](#). At no point will the student be put under any pressure, however if the disclosure is an emergency, then FutureLearn is obligated to contact the emergency services and confidentiality may need to be broken.

11.4 Some individuals, whether students, bystanders or staff may not be ready to make a disclosure, in which case FutureLearn recommends the following:

- Keep a diary of any incidents of concern and note the date, time, place and what was said and/or done and the way it made them feel. The names of any witnesses should be noted.
- Retain any relevant documents and/or information.

- Speak to the individual(s) involved if the student feels comfortable to do so. Again, it would be helpful to keep a diary in case the student wishes to go on to disclose that matter to FutureLearn.
- If the student does not feel able to speak to the individual(s) involved, they may prefer to write to them to outline the behaviour they find unacceptable and ask for it to stop. A copy of any correspondence should be retained by the student together with any response(s)

12.0 Investigation

12.1 The disclosure will be referred to the Director of Academic Affairs by the Student Services Officer to investigate.

12.2 When required the Director of Academic Affairs can suggest suspension of any individual involved in the investigation. This will follow the [Student Disciplinary Policy](#) or [Staff Disciplinary Policy](#).

12.3 Where an incident of sexual misconduct or harassment falls within the scope of policy and outside of the parameters of the law the Director of Academic Affairs will alert the Managing Director and the incident will be reported to the Police, working with them as necessary to support an investigation.

12.4 The [Safeguarding and Prevent Duty Policy](#) will be a reference point as part of an investigation.

12.5 During the investigation the student, witnesses and those alleged to have committed the offence will be supported by the student services team and kept up to date.

12.6 Where a case of misconduct has been identified internally FutureLearn will follow the Student Disciplinary Policy or the Staff Disciplinary Policy.

12.7 FutureLearn is committed to concluding investigations swiftly to reduce stress of all of those involved. Where it is reasonable and practicable to do so in accordance with its duties and obligations under data protection legislation, FutureLearn will provide the student that has raised an allegation of harassment, bullying or sexual misconduct with an outcome of the investigation and/or an explanation of any actions that FutureLearn has taken, or not taken. This includes where the outcome is changed for any reason.

13.0 Personal Relationships

13.1 FutureLearn values the professional integrity of staff and staff to student relationships. To ensure its activities remain appropriate and are seen as professional, it is important to manage personal relationships that may cross. FutureLearn recognises that staff or students may develop close personal connections, which can create conflicts of interest or uncertainty about conduct.

13.2 For the purposes of this policy, a personal relationship includes:

- Family relationships (e.g. spouse, civil partner, or another long-term partner, or a relative)
- Sexual or romantic relationships
- Close friendships
- Personal business, commercial, or financial connections

13.3 A business or financial relationship can develop into a personal relationship, or vice versa.

13.4 This policy outlines the conduct expected of staff to ensure student safety and maintain fairness, helping prevent actual or perceived misconduct, bias, or conflicts of interest. It covers relationships between staff and students, between colleagues, and with third parties such as suppliers. 'Staff' includes casual workers and postgraduate students in teaching or similar roles and applies to past relationships where conflicts may still arise. The focus is on managing situations involving power or influence imbalances.

13.5 The Office for Students recommends that, with some exception, all staff members are prohibited from having an intimate relationship with a student. Those exempt include:

- A relationship existing prior to the new rule coming into effect on the 1st August 2025
- The relationship commenced prior to the member of staff taking on a position of authority over the student.

13.6 Any breaches to 13.4 and 13.5 will be investigated and conducted under the Staff Disciplinary Policy.

13.7 Where a relationship occurs between two members of staff, those involved must inform the Director of HR at Global University Systems (GUSHR) immediately, by completing the [disclosure form](#).

13.8 GUSHR will assess the potential conflict of interest taking account of:

- Whether there requires a change to line management and reporting or change of department (if appropriate and possible).
- Whether the individuals can unfairly create advantage or disadvantage with other individuals.

13.9 All matters will be kept in confidence and a record of the relationships will be held on file by the GUSHR team only.

13.10 Any close relationships arising as part of the recruitment process must be declared.

13.11 In the same way as 13.6 any relationship between a member of staff and a third party of FutureLearn should be declared. Steps 13.7 to 13.8 will be followed. Any breaches to the process will follow 13.6.

14.0 Training

14.1 Training will be mandatory for students and staff. Students will receive their training at induction and refresher training will be made available annually via the Student Services team. Records of student completers of the training will be maintained by the Registry Department with the accountability remaining with the Academic Registrar.

14.2 Relevant staff including academic and professional service teams will receive training at induction and annually. The Director of Academic Affairs will be accountable for this taking place. Records of staff completers will be available from the IT department and will become part of the annual training plan.

14.3 Enhanced training will be provided to investigation and decision-making personnel to ensure fair processes are followed.

15.0 Monitoring

15.1 A quarterly report of sexual misconduct, bullying and harassment incidents will be reported to the Student Engagement, Quality and Programme Committee quarterly.

15.2 An annual report of 15.1 will be prepared and presented to the Student Engagement, Quality and Programme Committee for confirmation. This will then be presented to the Academic Standards and Quality Committee and then to the Board of Directors.

15.3 This policy will be reviewed every three years by the Student Engagement, Quality and Programme Committee.

Appendix

16.1 External Support Services

1. [Catch 22 Victim Services](#) supports people impacted by crime and anti-social behaviour.
2. [Crimestoppers](#) is a national charity with a helpline for reporting crime anonymously.
3. [Galop](#) is a national charity providing advice and support to members of the LGBT community.
4. [Hope After Harm – Support to victims, offenders and families impacted by the Criminal Justice System](#) provides innovative services and non-judgemental quality support to victim survivors and families involved in or impacted by criminal, civil and family justice issues.
5. [The Men's Advice Line](#) is a confidential helpline for men experiencing domestic violence from a partner or ex-partner (or any other family member).
6. [Outcry Witness](#) provides a safe, secure, and completely anonymous platform for victims of sexual violence to get information and keep a record of their experience so that they have control over the choices they decide to make.
7. [Rape Crisis](#) is a national charity offering confidential help, advice and a range of help centres around the UK.
8. [Refuge](#) supports women and children with a range of services including refuges, independent advocacy, community outreach and cultural-specific services.
9. [Safeline](#) is a specialist sexual violence and abuse charity led by the needs of its clients.
10. [Survivors UK](#) is a national charity supporting men who have been raped or sexually assaulted.
11. [The Havens](#) are specialist centres across London where victims of rape and serious sexual assault can get support and advice. Even if you're not ready to talk to the police, the Havens can provide you with medical help and advice about your options in confidence.
12. [The Survivors Trust](#) provides specialist support for women, men and children who have survived rape, sexual violence or childhood sex abuse.
13. [Victim Support](#) is a national charity dedicated to helping anyone affected by crime - not just victims and witnesses, but friends, family and anyone else caught up in the aftermath.
14. [Women's Aid](#) is a national charity working to end domestic abuse against women and children.

Staff Disclosure Form

Personal Relationships at Work Disclosure Form

All staff members are required to disclose to the Global University Systems HR, Funke Sadare, funke.sadare@futurelearn.com any personal relationships they have with either: an existing or potential student at FutureLearn, or another existing or potential staff member/third party where the existence of such a relationship may lead to an actual, perceived or potential conflict of interest.

Details on the types of relationships which must be disclosed and how such disclosures will be handled and stored are contained within FutureLearn's Sexual Misconduct, Bullying and Harassment Policy.

PART A: To be completed by the individual staff member making the disclosure
Name of staff member completing the disclosure:
Job Title:
Subject or Professional Services Department:
Name of individual with whom you have a personal relationship:
Status of that individual within/to FutureLearn (<i>please highlight from the following</i>): Existing student / Existing staff member / Potential student / Potential staff member
Subject or Professional Services Department of that individual: (<i>For staff members only</i>) Job title or potential job title of that individual:
Nature of the relationship you have with that individual (<i>please highlight from the following</i>): <ul style="list-style-type: none">• Husband, wife, fiancé/e, civil partner• Other sexual/intimate relationship• Other close family relationship (e.g. child/sibling/cousin etc) – please specify precise nature:
Date on which that relationship commenced:
If you wish to provide any further and potentially relevant information about the relationship, please do so here:
Date form sent to Global University Systems HR:
Please now send this form to Funke Sadare, funke.sadare@futurelearn.com

PART B: To be completed by the Head of People in discussion with the staff member making the disclosure
Are there any special arrangements needed to ensure compliance with FutureLearn's Sexual Misconduct, Bullying and Harassment Policy? If yes, please detail those arrangements here:

Date on which the special arrangements were agreed with the staff member:
Date/s any special arrangements will be implemented from:
This record will be retained on the individual's HR file.

Your personal data will be processed in line with our obligations under data protection legislation.