# Central Film School

## 2025/26

Central Film School

# **Prevention of Harassment & Sexual Misconduct Policy**

## 1. Introduction

- 1.1. This policy is designed to ensure a safe, welcoming and inclusive working and learning environment for all members of the Central Film School community.
- 1.2. Harassment and sexual misconduct (which includes sexual harassment) are unacceptable behaviours and will not be tolerated.
- 1.3. These behaviours are contrary to the Equality Act 2010; the Protection from Harassment Act 1997; and the Workers Protection Act 2024, and to Central Film School's vision, mission and core values.
- 1.4. No member of the Central Film School community is expected to tolerate such unacceptable behaviour, whether by a member of the Central Film School community, or by a third party such as a supplier or visitor to the School, or a member of the public.
- 1.5. Breaches of this policy by staff or students will be investigated under the procedures outlined, which may result in dismissal or expulsion and referral to the police. Breaches by third parties will be dealt with appropriately and may be referred to the police.
- 1.6. This Policy applies to harassment and sexual misconduct that is committed or is alleged to have been committed by students or staff, including:
  - all students of Central Film School throughout their period of registration
  - all members of staff employed or engaged by the School

- 1.7. Students and staff may (and are encouraged to) raise concerns of harassment or sexual misconduct (including sexual harassment) by using the reporting facilities outlined below.
- 1.8. The alleged misconduct may have occurred:
  - On and Off School property.
  - Via School systems (such as the VLE)
  - Online, whether via email, instant or text message, the internet or social media.
- 1.9. References to this policy can be found in:
  - Student Complaints Policy & Procedures
  - Non-Academic Disciplinary Procedures
  - Respect & Consideration Statement
  - Staff, Tutor, and Student Handbooks

# 2. Definitions and Key Terms

- 2.1. **Harassment:** 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 as defined by the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. It also includes alarming the person or causing the person distress, in line with the Protection from Harassment Act 1997. This includes, but is not limited to, verbal, non-verbal, physical, or online behaviour.
- 2.2. **Sexual Misconduct:** Any unwanted or attempted unwanted conduct of a sexual nature. This includes, but is not limited to:
  - Sexual harassment (unwanted conduct of a sexual nature).
  - Sexual assault (any sexual act where a person does not consent or is not able to consent).
  - Rape.
  - Exposing oneself.
  - Unwanted touching, grabbing, or brushing against.
  - Making unwanted sexual comments or jokes.
  - Sending unwanted sexual messages, images, or videos.
  - Stalking with a sexual element.
  - Sharing intimate images without consent.
- 2.3. **Consent:** Free, enthusiastic, and ongoing agreement to engage in sexual activity. Consent cannot be assumed, cannot be given if a person is intoxicated, incapacitated, or coerced, and can be withdrawn at any time. Silence or passivity cannot be interpreted as consent.
- 2.4. **Intimate Personal Relationship:** A relationship that involves physical intimacy (including isolated or repeated sexual activity) or romantic or emotional intimacy.

- 2.5. **Relevant Staff Member:** A member of staff who has direct academic responsibilities, or other direct professional responsibilities, in relation to a student.
- 2.6. **Abuse of Power:** A situation where a relevant staff member exploits a position of authority, influence, or trust to the detriment of a student, particularly in the context of intimate personal relationships.

# 3. Personal Relationships

- 3.1. Central Film School prohibits all intimate personal relationships between its permanent staff members and students. This prohibition applies whether the staff member is a "relevant staff member" to the student or not. Any such relationships must be immediately reported to the Senior Operations Manager for appropriate action, which may include disciplinary measures up to and including dismissal.
- 3.2. During the hiring process, staff have an obligation to declare an intimate or close personal relationship with any current Central Film School student.
- 3.3. If a personal relationship exists, such as a familial relationship, the Director of Courses & Curriculum, the Senior Registry & Quality Manager, and other Senior members of staff (where appropriate) must be made aware to mitigate the risk of preferential treatment or abuse of power.
- 3.4. Freelance staff (such as Sessional Tutors) are also required to declare any intimate or close personal relationships when they are being engaged for their services.

# 4. Freedom of Speech

- 4.1. Central Film School is committed to upholding freedom of speech and this policy will be implemented in a manner consistent with free speech principles.
- 4.2. This policy is designed to address harassment and sexual misconduct, which are not protected forms of speech.
- 4.3. The exposure of students to course materials, and statements made and views expressed by a person as part of teaching, research, or discussions about any subject matter connected with the content of a course, are presumed not to amount to harassment. This presumption can be rebutted in exceptional circumstances where there is clear evidence of malicious intent or a deliberate attempt to cause distress beyond the legitimate academic context.
- 4.4. All procedures and decisions will be carefully considered to ensure that they do not unduly interfere with lawful free speech, unless it is proportionate to do so to prevent harassment or sexual misconduct.

# 5. Prevention and Education

- 5.1. Central Film School is committed to proactive prevention through comprehensive education and awareness initiatives. This includes:
  - Mandatory Training:
    - For all students: Mandatory, interactive training on harassment and sexual misconduct, including consent, active bystander intervention, definitions of unacceptable behaviour, and reporting procedures, will be provided during induction and re-registration. This training will be evidence-based and delivered by individuals with appropriate expertise.
    - **For all staff:** Mandatory training on harassment and sexual misconduct, including recognising and responding to disclosures, understanding institutional policies and procedures, maintaining professional boundaries, and freedom of speech obligations. Staff in roles likely to receive disclosures, investigate, or make decisions will receive additional specialist training.
  - Awareness Campaigns: Students and Staff will be made aware of Central Film School's single source of information during annual meetings (such as inductions and re-registration) to raise awareness about harassment and sexual misconduct, challenge harmful attitudes, promote a culture of respect and consent, and highlight available support services.
  - **Curriculum Integration:** Where appropriate, discussions on consent, healthy relationships, and respectful behaviour may be integrated into relevant academic curricula, such as Intimacy Coordinator workshops.
  - **Clear Expectations:** This policy, along with other relevant policies clearly defines unacceptable behaviours and the consequences of engaging in harassment and sexual misconduct.

# 6. Reporting

- 6.1. Central Film School provides multiple, accessible, and clearly advertised routes for reporting incidents of harassment and sexual misconduct. We encourage anyone who has experienced or witnessed harassment or sexual misconduct to report it.
- 6.2. **Online Report**: A report can be made using the links below.
  - Anonymous Reporting
    - While anonymous reports may limit the institution's ability to take direct action, they are crucial for monitoring prevalence and identifying patterns.

## • <u>Reporting with Contact Details</u>

#### 6.3. In Person Report

- Students can report harassment and seek advice/support from the Student Services Team.
- Staff can report harassment and seek advice/support from their Line Manager or the Senior Operations Manager.

#### 6.4. **Report to the Police**

- In parallel to the School's own internal procedures students may also have the right to report conduct which may also constitute a criminal offence to the Police. If you report a matter to the police, you can still report a matter to the School.
- 6.5. If required, reporting mechanisms can be adjusted to ensure accessibility for all students and staff.

## 7. Investigation Procedures

- 7.1. All formal complaints of harassment and sexual misconduct will be addressed through fair, impartial, and timely procedures. Allegations of bullying, harassment or sexual misconduct will be dealt with under the relevant CFS policy and procedure depending on the circumstances.
- 7.2. **Student allegation against another student:** An allegation of bullying, harassment or sexual misconduct made by a student against another student will be dealt with by the School under the Non-Academic Disciplinary Procedures.
- 7.3. **Student allegation against a member of staff:** An allegation of bullying, harassment or sexual misconduct made against a member of staff raised by a student will be dealt with under the Student Complaints Policy and Procedure at Stage 1.
- 7.4. **Member of staff allegation against member of staff:** An allegation of bullying, harassment or sexual misconduct made against a member of staff by another staff member will be dealt with by the School under the procedures outlined in the Staff Handbook.

# 8. Support for Individuals Affected

- 8.1. Central Film School prioritises the well-being of all individuals affected by harassment and sexual misconduct, including those who have experienced incidents, those who report, and those who are accused. Support is available whether or not a formal complaint is pursued through the below means:
  - **Pastoral Support**: Students can access Pastoral Support Sessions with the Student Services Team to seek guidance and support, including signposting to relevant external support organisations.

- **Counselling**: Students can access Central Film School's free in-house counselling service for further support.
- Academic Support: Flexibility with academic deadlines or temporary adjustments to study arrangements can be applied where appropriate through our Mitigating Circumstances Policy. Students can also seek advice and guidance from their Personal Tutors.

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