

## HUMAN RESOURCES POLICY

### Staff Sexual Misconduct Policy and Procedure

Policy Owner:	Deputy HR Director (Employee Relations and Policy)
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## 1 Policy statement

- 1.1 Imperial College London is committed to ensuring a working and learning environment free from all forms of sexual misconduct and is committed to taking steps to prevent sexual harassment so that all members of the Imperial community can enjoy the right to study, live, work and be respected.
- 1.2 Every disclosure and report of sexual misconduct by any member of the Imperial community will be taken seriously. A list of definitions is provided in section 6.
- 1.3 Imperial will make every effort to deal with allegations of sexual misconduct as quickly as possible, and where necessary, will investigate them in line with the appropriate procedure.
- 1.4 The online reporting platform [Report and Support](#) can be used to disclose and/or report experiences of sexual misconduct. The tool is available to anyone to use, including staff, students, those holding honorary associations, contractors and visitors to Imperial. Alternatively, individuals may choose to disclose and/or report experiences of sexual misconduct via the alternative routes that are outlined within this policy.
- 1.5 Imperial will ensure relevant staff are appropriately trained to respond to and investigate disclosures and/or reports of sexual misconduct.
- 1.6 Sexual harassment is unlawful and disciplinary action will be taken against staff who are found to have committed sexual misconduct offences, a consequence of which could be dismissal.
- 1.7 Imperial respects that an individual may choose to disclose an incident of sexual misconduct anonymously. Anonymous disclosures will always be reviewed and used to help Imperial understand the nature and extent of sexual misconduct experienced by members of our community. This will help Imperial understand patterns in behaviour and support our progress towards eliminating all forms of sexual misconduct. However anonymous reports will not usually lead to a disciplinary investigation.
- 1.8 Complaints of sexual misconduct against a member of staff will be investigated in line with the relevant staff [Disciplinary Policy and Procedure](#) including the [Annexes to the Appendix to the Ordinances](#) and in conjunction with this policy and procedure set out below.
- 1.9 Imperial's [Values](#) are at the very centre of our work and guide our behaviour as a community, across all levels. This policy aims to protect and promote our Values of Respect, Collaboration, Excellence, Integrity and Innovation.

## 2 Scope

- 2.1 This Policy applies to sexual misconduct that is committed or alleged to have been committed by anyone working for the university. This includes employees, workers, apprentices and those holding honorary or visitor associations.
- 2.2 In the event of sexual misconduct by third parties such as contractors, clients, customers, vendors, suppliers, volunteers or other individuals external to the university, refer to 14.
- 2.3 This policy does not cover complaints of sexual misconduct against a student by another student or complaints against a student by a member of staff. These will be investigated in line with the [Student Code of Conduct](#) and the [Student Disciplinary Procedure](#).
- 2.4 The policy applies to any sexual misconduct that may take place in any work situation and during any situation related to work, such as a social event with colleagues, conferences, trips abroad or on social media.
- 2.5 The policy covers any disclosure, report, or information relating to both current, recent, and non-recent incidents, although investigations into historical incidents may be limited (e.g. due to availability of witnesses and ability to gather historical evidence).

- 2.6 The policy does not cover incidents of non-sexual misconduct or non-sexual harassment. For other matters of harassment, bullying and victimisation, please refer to the [Harassment, Bullying and Victimisation Policy](#).
- 2.7 Where allegations made against a member of staff cover a range of matters, but include an allegation of sexual misconduct, a decision will be made by the Deputy Director of HR (Employee Relations and Policy) as to whether the matters will be considered concurrently as part of one process. The procedure associated with the Sexual Misconduct Policy will apply in this scenario.
- 2.8 In circumstances where an individual is enrolled as a student and works for the university alongside their studies (e.g. as a Graduate Teaching Assistant, or other casual work), the appropriate policy and procedure will be determined by the nature and context of the incident in question. The decision to apply either the staff or student procedure will be determined by the Employee Relations team, in conjunction with Student Services, and will be based on the roles and responsibilities of the individuals involved and the specific circumstances of the incident.
- 2.9 Advice and guidance on the use of the appropriate procedure can be obtained from the [Employee Relations team](#).

### **3 Equality and Diversity**

- 3.1 Imperial is committed to equality, diversity and inclusion. Implementation of this policy must be clear and transparent and not subject to any unfair discriminatory practices.
- 3.2 If a member of staff requires any adjustments to ensure equal access and opportunity at any stage of the procedure, the Equality, Diversity and Inclusion Centre (EDIC) may be contacted for advice.
- 3.3 This policy is inclusive and applies to all staff irrespective of any protected characteristic.

### **4 Safeguarding**

- 4.1 There may be certain circumstances where Imperial is required to take appropriate and immediate action to prevent potential harm to individuals or Imperial, based on a risk assessment. This may include the sharing of information or a decision to formally investigate allegations made against a member of staff without the consent of the reporting party.
- 4.2 As far as possible, anyone who has made a disclosure will be kept informed if this action needs to be taken, however in some circumstances, Imperial may need to act on information despite or without knowledge of the wishes of the individual(s) who experienced the incident.

### **5 In an emergency**

- 5.1 If there is an immediate threat to an individual's safety on campus, the emergency services need to be contacted via the Security team, who will guide them to the right location:
  - Call Security (the [Security contact numbers](#) are different for each campus)
  - Contact Security using the [SafeZone](#) app
- 5.2 If there is an emergency off campus, call 999 to access emergency services.

## 6 Definitions

For the purposes of this Policy and Procedure, the following definitions apply:

**Staff:** any person who is engaged by the university as an employee, worker, apprentice and those who have honorary or visitor associations with the university.

**Students:** all undergraduate and postgraduate students, full-time and part-time students, students studying on or off campus or online, whether they are currently enrolled in subjects or deferred from their studies. It does not include Imperial College London graduates or individuals who are not currently admitted as students.

**Third party:** includes contractors, clients, customers, vendors, suppliers, volunteers or other individuals external to the university.

**Sexual misconduct** is an umbrella term that is used to describe a broad range of inappropriate and unwanted behaviours of a sexual nature. It covers all forms of sexual violence, including sex without consent, sexual abuse (including online and image-based abuse), non-consensual sexual touching, **sexual harassment** (unwanted behaviour of a sexual nature which violates a person's dignity; makes them feel intimidated, degraded, or humiliated or creates a hostile or offensive environment), stalking, abusive or degrading remarks of a sexual nature. It also covers behaviours such as grooming, coercion, the promise of a reward for sexual access and sexual demands or threats. Sexual misconduct might be a series of different behaviours, repeated forms of the same unwanted behaviour or a one-off incident and may be through any medium, including for example, online.

Examples of sexual misconduct include (not an exhaustive list):

- sex or sexual touching without consent
- sexually explicit remarks, innuendos or banter
- sexual insults, jokes, teasing or songs
- sexual coercion where a person pressures, tricks, threatens, or manipulates someone into unwanted sexual activity in a non-physical way
- wolf whistling, cat calling or making other offensive sexual noises
- sexual remarks about someone's dress, appearance or private life, including their sexuality or gender identity
- unwanted or inappropriate physical contact including, but not limited to touching, pinching, groping or smacking
- unwanted requests to engage in or discuss sexual activity
- lifting or removing clothing without consent
- acts of voyeurism such as upskirting (where someone takes a picture under a person's clothing without their permission)
- display or distributing private and personal explicit images or video footage of an individual without their consent.

- stalking (persistent and unwanted conduct of one or more kinds of behaviours listed above. It can be physical or psychological and take place directly against a person, or by approaching a third party about a person)

**Consent** is the agreement, by choice, to participate in a sexual act where an individual has the freedom and capacity to make that choice. Consent cannot be assumed on the basis of a previous sexual experience or previously given consent and may be withdrawn at any time.

**Freedom to consent** is where an individual is able to freely engage in a sexual act. Consent is not present if the individual unwillingly participates as a result of the exploitation of power, or coercion or force (any physical or emotional harm or threat or physical or emotional harm which would reasonably place an individual in fear of immediate or future harm, with the result that the individual feels compelled to engage in a sexual act). Free consent cannot be given if the person does not have the capacity to consent. Incapacitation may occur when someone is asleep, unconscious, semi-conscious, or in a state of intermittent consciousness, or any other state of awareness 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.

**Incapacitation due to intoxication** may arise from alcohol or drug use and should be evaluated on the basis of how the alcohol/drugs have affected the person. Signs of incapacitation may include, but are not limited to slurred speech, unsteady gait, bloodshot eyes, dilated pupils, unusual behaviour, blacking out, lack of full control over physical movements, 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 misconduct or for failing to obtain consent.

A **Disclosure** is when someone wants Imperial to know that something has happened, but they do not want, or are not ready, to be involved in a formal investigation. Disclosures can be made through the Report and Support tool or by contacting the ER team, a Harassment Support Contact or Trade Union Representative. Please note that Harassment Support Contacts or Trade Union Representatives are not available for students, but they can access Student Support Advisers through Report and Support.

A **Report** is when someone makes a formal report, initiating a formal investigation into an incident following the relevant HR policy and procedure for an allegation made against a member of staff, or the Student Disciplinary Procedure for an allegation made against a student. Individuals who choose to make a formal report will be offered support and guidance throughout the process.

The **Reporting Party** is the individual who has made a formal complaint regarding an experience of sexual misconduct.

The **Responding Party** is the person named in a formal complaint who is alleged to have committed an act of sexual misconduct.

**Harassment Support Contacts (HSCs)** are trained volunteers who can provide confidential support. They will listen and provide information and help staff explore the informal and formal options available to them at Imperial. They can provide information and support for staff disclosing an experience of sexual misconduct.

**Student Support Advisers** will listen and support all students who experience any forms of bullying, harassment, and discrimination, including sexual misconduct. They will help a student to understand the steps that they can take within Imperial, including an informal resolution, making a formal report, or accessing specialist support.

**Report and Support** is a tool that can be used by staff, students, contractors and visitors to Imperial to disclose or make a full report on unwelcome behaviours including sexual misconduct. An individual can choose to disclose something anonymously or can provide their details to be put in contact with someone from the Employee Relations team. Where contact details are provided,

the individual will be referred to the appropriate service to be provided information on support options on how to take their disclosure or report forward.

**[Trade Union Representatives](#)** can offer support and assistance to individuals and attend formal meetings/hearings.

## 7 Responsibilities

### Leaders and line managers

- 7.1 Faculty Deans, Heads of Departments/Divisions, and all other leaders and managers have a duty to familiarise themselves with this policy and procedure, and to ensure a working and studying environment where everyone is treated with equal respect and dignity.
- 7.2 To encourage a culture of respect and speaking up, Leaders and managers should be prepared to challenge inappropriate behaviours.
- 7.3 Line managers are expected to look out for changes in behaviour amongst their staff that might suggest they are the victim of unwanted behaviour e.g. an increase in absence, a decline in performance or appearing withdrawn.
- 7.4 Line managers should ensure new staff complete a thorough induction which includes being informed of the Sexual Misconduct Policy and informed of the steps that can be taken to report any inappropriate behaviour.
- 7.5 Leaders and Line Managers must escalate all allegations of sexual misconduct through the appropriate channels outlined in this policy so that the matter can be considered promptly, and support can be provided to the individuals involved.
- 7.6 Individuals may be encouraged to disclose or report their experience via Report and Support, however if this is not appropriate, the Manager should refer the matter immediately to the Employee Relations team who will provide the necessary advice.

### Members of staff

- 7.7 Staff are required to conduct themselves in accordance with Imperial Values and behaviours and not behave in ways which could be considered to be sexual misconduct.
- 7.8 We expect all our Imperial community to ensure colleagues, clients, students, and visitors are treated with dignity and respect.
- 7.9 Staff should look out for their colleagues and any changes in behaviour that might suggest they are the victim of unwanted behaviour and raise any concerns immediately.

### Human Resources

- 7.10 HR staff are responsible for ensuring the HR Employee Relations (ER) team are notified of any allegations of sexual misconduct so that the matter can be considered promptly, and support can be provided to the individuals involved.
- 7.11 The ER team will provide advice and guidance to managers and staff on all aspects of the Sexual Misconduct Policy and Procedure.
- 7.12 The ER team will review all disclosures and reports received through Report and Support and will ensure that the Reporting Party is signposted to the appropriate support.
- 7.13 HR will support Faculties/Departments with the implementation of the Sexual Misconduct Policy and support Leaders and Managers to take steps to prevent sexual misconduct in the workplace.

## 8 Making a disclosure

- 8.1 Experiences of sexual misconduct should normally be disclosed via [Report and Support](#). This is to ensure that the disclosure reaches the correct team, either the ER team or the Student Support team so that appropriate support can be provided promptly.
- 8.2 Where a member of staff does not feel able to disclose or report using the online tool, they may seek advice from the ER team or a Harassment Support Contact. Staff may also choose to seek advice from their Trade Union Representative or HR Partner.
- 8.3 Students can seek support from the [Student Support Team in Student Services](#) as an alternative to Report and Support.
- 8.4 Staff who receive a sexual misconduct disclosure from a member of staff or a student should direct them to the Report and Support tool or direct them to the ER team, or Student Support Team so that they can be provided with the necessary support as soon as possible.
- 8.5 After submitting a named disclosure with contact details, where the Reporting Party is a member of staff they will be contacted by a member of the ER team within 2 working days of their submission. If the Reporting Party is a student they will be contacted by a Student Support Adviser, within 2 working days of their Report and Support submission, who will explain the support and options available.
- 8.6 After making a disclosure, the following options are available to the Reporting Party:
  - Take no further action at this time
  - Take an informal resolution approach if appropriate (see 12.2)
  - Proceed with a formal investigation (see section 9)
  - Make a report to the police if they have not already
- 8.7 Imperial respects the right of the Reporting Party to choose how to take forward a disclosure. They will be given the opportunity to be heard and time to consider their options before proceeding.
- 8.8 No action will be taken by Imperial unless expressly requested to do so by the Reporting Party except in circumstances where there is a concern about immediate safety and/or if there is a safeguarding concern (see 4.1 and 4.2).

### Witness disclosures

- 8.9 If the person disclosing has not experienced the sexual misconduct but have witnessed the misconduct taking place or have been informed of the misconduct, Imperial will respect the right of the individual who experienced the incident to choose how they wish to take forward a disclosure. The ER team will offer guidance as appropriate.
- 8.10 Subject to instances where it is identified that there is a safeguarding concern (see 4), a third-party disclosure will only become a report if the individual who experienced the incident wants action to be taken.

## 9 Making a formal complaint

- 9.1 Reporting is the sharing of information about an incident of sexual misconduct for the purposes of initiating a formal investigation.
- 9.2 A report should include as much information as possible about the incident, the situation in which it took place, any witnesses to the incident, and the misconduct that took place. Evidence could include screenshots of phone messages or emails, if relevant.

- 9.3 If the incident has been reported to the police, the Reporting Party must include details of the police investigation such as the crime reference number.
- 9.4 Reports of sexual misconduct perpetrated by a member of staff will be referred to the ER team.
- 9.5 Upon receipt of the information, the ER team will contact the reporting party to discuss how the matter will be taken forward and will provide information about the support available to them throughout the process.

## **10 Support for students**

- 10.1 If a student has made an allegation of sexual misconduct against a member of staff, they will be offered the support of a Student Support Adviser who will act as a single point of contact throughout the procedure. The role of the Student Support Adviser is to provide information to the student on the process as well as help with practical and emotional support and safety planning. They can act as conduit for communication between Imperial and the student and may accompany the student to investigation/formal meetings as part of the procedure.
- 10.2 If there is an allegation of sexual misconduct against another student, both students will be supported through the process by the student services team.
- 10.3 Students may choose to access support from the [ICU Advice service](#) where an Adviser can provide advice on understanding the policies and procedures at Imperial.

## **11 Support for staff**

- 11.1 The Reporting Party and the Responding Party will each be allocated an HR Partner who will provide information and practical support to them throughout the procedure.
- 11.2 The Reporting Party and the Responding Party may also choose to receive support from a Harassment Support Contact and may wish to seek support from their [Trade Union Representative](#).

## **12 Sexual misconduct procedure**

- 12.1 A report (formal complaint) of alleged sexual misconduct against a member of staff will be investigated as a disciplinary matter and will be conducted according to the staff Disciplinary Policy and Procedure or Annexes to the Appendix to the Ordinances.
- 12.2 There may be some instances where a matter can be resolved informally. A member of the ER team will be able to discuss and advise if this is something that the Reporting Party could consider.
- 12.3 To ensure clarity for both the Reporting and Responding party, the following variations to the Disciplinary procedure will be applied during the formal procedure:

### **Investigation**

- 12.4 Cases of sexual misconduct will be investigated by an Investigating Officer who has been specifically trained to take a trauma informed approach to investigations.
- 12.5 The Investigating Officer will be responsible for deciding how the investigation will be conducted and what information will be collected. The timetable for gathering information and evidence should be discussed and agreed with all parties and every effort should be made to minimise delays to the procedure.

- 12.6 Once the investigation is complete, the Investigating Officer will determine whether there is a case to answer. The outcome will be provided normally within 20 working days of the investigation conclusion.
- 12.7 The matter will proceed to a disciplinary hearing if the Investigating Officer decides there is a case to answer. The Responding Party will be informed and will be provided with a copy of the Investigating Officer's report.
- 12.8 Where the matter proceeds to a Disciplinary Hearing, the Reporting Party will also be informed and will receive an outcome letter, including details of the allegation(s) to be considered by a disciplinary panel.
- 12.9 If the decision is that the matter will not proceed to a Disciplinary Hearing, the Responding Party will be provided with a copy of the investigating officer's report which will include any recommendations made, including timeframes for completion by the Responding Party.
- 12.10 Where the matter will not proceed to a Disciplinary Hearing, the Reporting Party will receive an outcome letter advising them of this decision, summarising the Investigating Officer's findings. Where possible, the letter will include details about action that will be taken to minimise any adverse effects in accessing their work or study environment, although there may be limits to the information about recommendations in relation to the Responding Party that can be shared with the Reporting Party.
- 12.11 After the investigation, both parties will be informed of the ongoing support available to them.

### **Investigation Review**

- 12.12 Following the investigation and only where the outcome is no case to answer, the Reporting Party may request a review of the investigation.
- 12.13 The request for review should be made in writing, setting out the reasons for review, with any supporting evidence, to the Deputy HR Director (Employee Relations and Policy) within 10 working days of receipt of the investigation outcome. Requests for an extension may be considered at the discretion of the Deputy HR Director (Employee Relations and Policy).
- 12.14 The request for a review of the investigation must be based on the following:
  - Procedural errors where there is evidence that the process was incorrectly followed and as a result could have influenced the outcome.
  - New evidence has come to light that was not included in the investigation.
  - The fairness and reasonableness of the outcome. This is where the Reporting Party considers the outcome of the investigation is not fair or reasonable given the findings of the investigation.
- 12.15 The Deputy HR Director (Employee Relations and Policy) will arrange a Review Meeting and will appoint an independent person, who has been trained and has no prior involvement in the case to review the investigation. The reviewer will be supported by a member of the ER team.
- 12.16 The Review Meeting is not an opportunity to re investigate the original complaint.
- 12.17 The reviewer will invite the Reporting Party, who may be accompanied by a work colleague or Trade Union Representative, to the meeting to discuss their reasons for requesting the review. The reviewer may also meet with the Investigating Officer to discuss the investigation.
- 12.18 If new evidence comes to light, the meeting may be adjourned to enable further investigations by the original Investigating Officer. Every effort will be made to address the issue promptly and all parties will be kept informed of the timetable.

- 12.19 At the conclusion of the Review Meeting, a letter with the decision will be issued, normally within 10 working days of the final meeting. A copy of the letter will also be provided to the individual's representative, the Responding Party who had allegations raised against them, the relevant line manager(s) and the local Head of HR.
- 12.20 The possible outcomes following a Review Meeting are:
  - that the original investigation outcome remains, and the Review Panel confirms there is no case to answer.
  - the Review Panel decides that there is a case to answer and refers the matter to a Disciplinary Hearing.
- 12.21 The decision of the Review Meeting is final.

### **Disciplinary Hearing**

- 12.22 The Disciplinary Hearing will be arranged and conducted in accordance with the procedure as set out within the Disciplinary Policy. In cases of sexual misconduct, the Chair of the disciplinary panel will be trained to manage cases of sexual misconduct.
- 12.23 The Disciplinary Hearing will be conducted sensitively, and every effort will be made to accommodate any requested adjustments by the Reporting Party. This may include arrangements to ensure the Reporting Party is not in the same physical location as the Responding Party, a request to filter questions through the Panel Chair or attend the hearing remotely via Teams. The ER representative will be able to provide support with adjustments.
- 12.24 Any witnesses attending to provide evidence may be accompanied to the Disciplinary Hearing by a work colleague or trade union representative.

### **Outcome of the Disciplinary Hearing**

- 12.25 The Chair of the panel along with the ER representative supporting the panel will agree with both the Responding Party and the Reporting Party how the outcome should be communicated to them e.g. they may prefer to meet in person or receive the outcome in writing. Details of who will receive the outcome as well as if the individual would like to be accompanied to a meeting to receive the outcome will be discussed with both parties.
- 12.26 The outcome of the Disciplinary Hearing will normally be confirmed to the Responding Party within 10 working days.
- 12.27 The Reporting Party will also be informed of the outcome of the Disciplinary Hearing including whether a disciplinary sanction has been given, however they will not be advised on the level of sanction issued. If the Reporting Party is a student, the ER team will also inform the Student Support Adviser of the outcome.
- 12.28 Where the Responding Party remains employed and where relevant, the Reporting Party will be informed of any action taken to minimise any adverse effects in continuing their work or study at Imperial.
- 12.29 There may be limits to the information about the consequences to the Responding Party that can be shared with the Reporting Party.

### **Disciplinary Appeal**

- 12.30 Only the Responding Party has the right to appeal the outcome of the Disciplinary Hearing.
- 12.31 The Reporting Party will be informed if the Responding Party appeals and will be provided with the outcome of the appeal hearing i.e. whether it is upheld or not upheld only.

## **End of formal procedure**

- 12.32 Once the formal procedure is concluded, parties will be offered ongoing support as necessary and appropriate.

## **13 Police or criminal investigations**

- 13.1 Internal investigations will not be bound by the outcome of any external criminal investigation. Where the alleged misconduct requires prompt action, Imperial is not restricted by awaiting the outcome of any prosecution before taking action.
- 13.2 In some cases, it may be appropriate to suspend an internal investigation pending the outcome of a Police investigation. In these instances, support will still be available for the parties involved.

## **14 Sexual misconduct and third parties**

- 14.1 Sexual misconduct or harassment of any kind by third parties such as contractors, clients, customers, vendors, suppliers, volunteers or other individuals external to Imperial will not be tolerated.
- 14.2 Third parties who interact with our staff are expected to maintain professional conduct and respect at all times. Any inappropriate behaviour, including sexual harassment, will be dealt with promptly and seriously.
- 14.3 Anyone who experiences or witnesses sexual misconduct by a third party is encouraged to report the incident immediately. Reports can be made using the reporting methods set out in this policy, including Report and Support, informing a line manager/supervisor or by informing the Employee Relations Team.
- 14.4 Upon receiving a report of sexual misconduct by a third party, an investigation will be conducted into the incident, following which, appropriate action will be taken based on the findings. This may include warning the third party of the unacceptable behaviour, reporting the behaviour to the third party's employer or ending the arrangement with that third party.
- 14.5 Staff and students who make a complaint of sexual misconduct by a third party will be supported through the process.

## **15 Confidentiality**

- 15.1 All information relating to a sexual misconduct case will be treated confidentially. Information relating to the alleged misconduct will be shared with only those who have a legitimate requirement to see the documentation as part of resolving the matter or any consequent procedure and therefore the processing of data for contractual necessity.
- 15.2 The Responding Party will normally be informed of the names of any witnesses whose evidence is relevant to disciplinary proceedings and witnesses will be advised that their witness statement may be seen by the Responding Party unless Imperial believes that the identity of witnesses should remain confidential, for example in cases where there is a genuine fear of reprisals or violence.
- 15.3 It is expected that all parties involved will be sensitive to the nature of such proceedings, including matters discussed and any evidence provided. Breach of confidentiality by a member of staff may compromise the integrity of the procedure and may itself be subject

to disciplinary action. This does not prevent individuals from seeking appropriate advice, support and information in relation to the case e.g. from their Trade Union.

- 15.4 If Imperial continues to investigate any matter as a duty of care or a legislative requirement then it may be necessary to share the information with appropriate external parties such as regulatory bodies and Grant awarding bodies.

### **Recording and monitoring information**

- 15.5 Written records will be kept by HR at each stage of the formal procedure. Staff may take their own written record of meetings, but recording devices, including use of mobile phones and Microsoft teams will not be permitted.
- 15.6 Any personal data collected or retained in relation to the Sexual Misconduct policy or procedure will be held in accordance with relevant data protection legislation. Further information regarding how data will be processed is detailed in Imperial's Privacy Notice for Staff.

### **16 Resources and support**

- Harassment Support Contacts
- Joint Trade Union Representatives
- Student Support Advisers
- Confidential Care
- Sexual Violence and Harassment Support for students
- Sexual Assault Referral Centre (SARC)
- Other external support services and information

### **17 Related policy and guidance**

- Harassment, Bullying and Victimisation Policy
- Staff Disciplinary Policy and Procedure
- Student Complaints and Disciplinary Procedures
- Personal Relationships Policy
- Alcohol and Substance Misuse Policy
- Lone Working