



GREEN VALLEY ACADEMY

Sexual Misconduct, Sexual Harassment and Staff–Student Relationships Policy

Academic Board Approval, 5 October 2026

DOCUMENT CONTROL

Reference	GVA-28 (merges the sexual misconduct policy, the response flowchart and the staff–student relationships policy into a single instrument)
Policy owner	Wellbeing Team Leader (student-facing operation); Group HR Executive Lead (staff-facing operation)
Approved by	Academic Board — 5 October 2026
Effective from	5 October 2026
Next review	August 2027
Applies to	All students, staff, members of the Board of Directors, contractors and visitors, in person and online
Linked documents	Anti-Harassment and Bullying Policy; Safeguarding and Prevent Policy; Report and Support Form (Form 3); Student Discipline Procedure; staff disciplinary procedure; University of Wolverhampton academic regulations

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1. PURPOSE, COMMITMENTS AND SCOPE

- 1.1** Sexual misconduct violates the dignity, autonomy, safety and education of those who experience it, and Green Valley Academy treats its prevention, and the response when it occurs, as matters of the highest institutional priority. This policy defines sexual misconduct and sexual harassment; establishes a trauma-informed response in which the person reporting retains control over what happens wherever the law permits; prescribes how investigations are conducted and how outcomes are determined for student and staff respondents; and, in Part B, regulates personal relationships between staff and students, on the principle that clear professional boundaries prevent harm before it can occur.
- 1.2** The Academy makes the following commitments without qualification, and every provision of this policy shall be interpreted consistently with them: a person who discloses sexual misconduct will be listened to, taken seriously and treated with respect and compassion; support will be provided unconditionally, and will never depend upon the person's willingness to make a formal report, to name a perpetrator or to involve the police; the reporting person's choices will be respected at every stage, subject only to overriding safeguarding obligations under the Safeguarding and Prevent Policy which will always be explained; no confidentiality agreement, non-disclosure agreement or settlement term will ever be used to prevent a person from speaking about their own experience, from supporting others, or from reporting to the police or any regulator; and no person will ever suffer detriment in their studies, employment or standing at the Academy for making a report in good faith.
- 1.3** This policy applies to conduct between any members of the Academy community — student to student, staff to student, student to staff, and staff to staff — whether it occurs on campus at The Atrium, online, at Academy events, on placements or trips, or in private settings where the conduct has a continuing effect on a person's ability to study or work at the Academy. Conduct occurring before a person joins the Academy may also engage in this policy where it creates a present risk or a present effect within the Academy community.

2. DEFINITIONS

- 2.1** Sexual misconduct means any unwanted or attempted unwanted conduct of a sexual nature, and includes without limitation: sexual harassment as defined in clause 2.2; sexual assault and rape; sexual coercion, including the abuse of power, position or trust to obtain or attempt to obtain sexual activity; the sharing, taking or threatening to share intimate images or recordings of a person without consent; voyeurism, indecent exposure and sexualised stalking; and grooming. Much of the conduct within this definition is also criminal, including under the Sexual Offences Act 2003 and the Protection from Harassment Act 1997, and nothing in this policy limits or replaces the criminal law; the Academy's processes and the criminal process are distinct, and may run in parallel in accordance with clause 7.2.
- 2.2** Sexual harassment means unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, within the meaning of section 26(2) of the

Equality Act 2010. It includes, by way of example and not limitation: sexual comments, jokes, gestures or sounds directed at or about a person; unwelcome sexual advances, propositions or pressure for sexual activity; unwanted physical conduct of a sexual nature; the display or sending of sexual images or messages; and intrusive questioning or commentary about a person's body, appearance, private life or sexual orientation. A single incident, if sufficiently serious, can constitute sexual harassment; and conduct may constitute harassment notwithstanding that it was not directed at the person affected.

- 2.3** Consent means agreement by choice, given by a person who has both the freedom and the capacity to make that choice. For the purposes of this policy: a person does not consent where they are incapacitated through alcohol or drugs, asleep or unconscious, or where agreement is obtained by force, threat, fear, deception or the abuse of a position of power or trust; consent to one sexual act is not consent to any other act, and consent on one occasion is not consent on any other occasion; consent may be withdrawn at any time, whereupon any continuing act ceases to be consensual; the absence of protest, the absence of resistance and silence do not constitute consent; and the responsibility for ensuring that consent is present rests at all times with the person initiating the act. These principles shall be taught in induction and training and shall be applied in every process under this policy.
- 2.4** The reporting party is the person who has experienced or witnessed the conduct and discloses or reports it; the responding party is the person whose conduct has complained of. Both are members of the Academy community to whom duties of fairness, support and confidentiality are owed, and nothing in this policy presumes the truth of any allegation before it has been fairly determined.

3. PREVENTION AND CULTURE

- 3.1** The Academy's first objective is that sexual misconduct should not occur, and it shall pursue that objective through sustained, visible activity rather than declaration alone. Every student shall receive, at induction and at the start of each academic year, a session covering this policy, the meaning of consent, the behaviours that constitute harassment, active-bystander skills, and the routes by which concerns may be raised; every member of staff shall receive equivalent training at induction and annually, with enhanced training for the Wellbeing team, Personal Academic Tutors, investigators, and all managers; and the Principal shall ensure that the Academy's public communications, campus environment and leadership behaviour consistently reinforce these standards. The Student Support, Safeguarding and Wellbeing Committee shall review survey data, anonymised case data and student-voice intelligence each term for early signals, and shall commission have targeted preventative action wherever a pattern emerges.

4. DISCLOSURE AND IMMEDIATE RESPONSE

- 4.1** A person may disclose sexual misconduct to anyone they trust: to any member of staff, to their Personal Academic Tutor, to the Wellbeing team directly, or through the online Report and Support Form (Form 3), which accepts both named and anonymous reports. Every member of staff receiving a disclosure shall respond in accordance with the

following mandatory sequence: first, attend to immediate safety and medical needs, telephoning 999 or supporting attendance at an emergency department where required; secondly, listen with belief, patience and without judgement, allowing the person to share only as much as they wish, and asking no investigative questions; thirdly, explain — without pressure in any direction — the options for preserving evidence, including that a Sexual Assault Referral Centre can conduct a forensic medical examination and store evidence, generally most effectively within seven days of an assault, without any obligation to involve the police then or later; fourthly, explain the support and reporting options in Section 5; and fifthly, with the person's agreement, refer them to the Wellbeing team the same working day. Where the person is under eighteen or an adult at risk, the safeguarding duties in the Safeguarding and Prevent Policy apply immediately, the Designated Safeguarding Lead (DSL) shall be informed, and the procedures shall be explained sensitively to the individual.

- 4.2** A trained member of the Wellbeing team shall contact every named reporting party within one working day of referral, and shall act as their single, consistent point of contact thereafter, so that the person is never required to retell their account to successive strangers. The Wellbeing team shall maintain, publish alongside Form 3 and keep current, the details of the nearest Sexual Assault Referral Centre and of local specialist services, including independent sexual violence advisers. For specialist support following sexual assault, the principal SARC serving Bedfordshire and Luton is The Emerald Centre – Bedfordshire Sexual Assault Referral Centre. The current NHS listing gives the telephone number as 0330 223 0099. Independent Sexual Violence Adviser (ISVA) support is available through One YMCA's Bedfordshire ISVA Service, which provides free and confidential support across Bedfordshire. The current contact details are 0300 002 0004 and ISVABeds@oneymca.org.

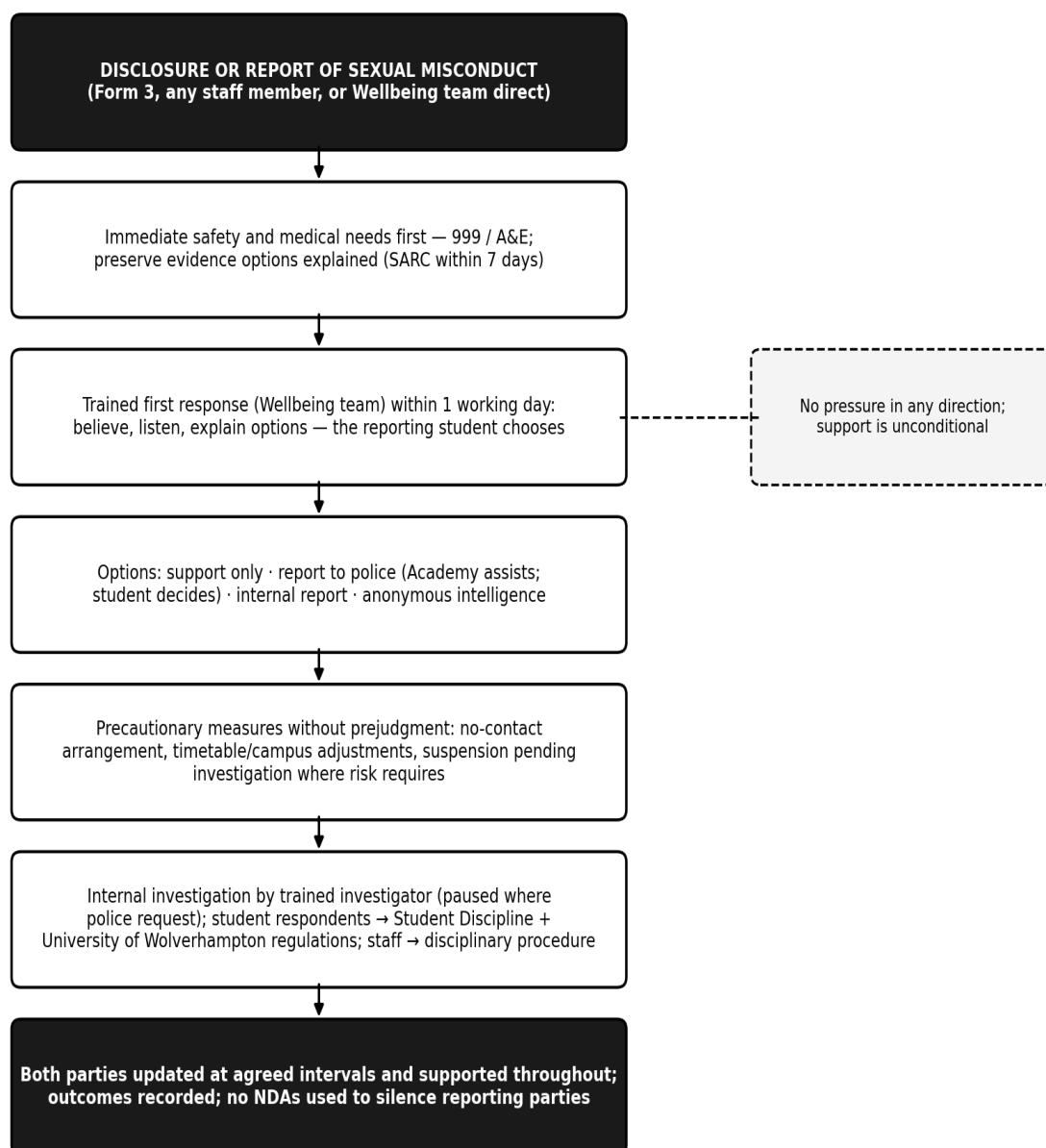


Figure 1: Sexual misconduct disclosure and response process

5. OPTIONS OPEN TO THE REPORTING PARTY

- 5.1** The trained responder shall set out four options, shall make clear that they are not mutually exclusive and may be combined or changed at any time, and shall respect the reporting party's decision without persuasion in any direction: first, support only, under which the person receives every measure in Section 6 and nothing further occurs unless and until they choose; secondly, a report to the police, in which case the Academy shall assist practically — providing a private space, accompaniment to appointments if wished, and information — while continuing its own support and precautionary measures in parallel; thirdly, an internal report, initiating investigation by the Academy under Section 7; and fourthly, anonymous intelligence, under which the information is recorded to identify patterns and inform protective action, the person being told honestly that

anonymity will limit individual follow-up. Where the reporting party elects to take no action but the Designated Safeguarding Lead (DSL) (in consultation with the Wellbeing Team Leader) judges that others are at significant risk, the Academy may need to act on the information notwithstanding; in that event the reporting party shall be told what will happen, why, and what it will and will not involve, before any step is taken wherever that is possible.

6. SUPPORT AND PRECAUTIONARY MEASURES

- 6.1** The following support shall be available to the reporting party, and — because fairness requires it and because unresolved allegations harm everyone concerned — appropriate parallel support shall also be offered to the responding party: a named Wellbeing contact for the duration of the matter; referral under the Mental Health and Wellbeing Referral Policy and signposting to specialist external services; academic protections arranged through the University of Wolverhampton's extenuating-circumstances and support procedures, organised by the Academy in such a way that the person is not required to disclose the underlying events repeatedly; and practical adjustments to timetables, seating, campus arrangements and communication channels.
- 6.2** Where the facts alleged, if true, indicate a risk to any person, the Academy shall consider precautionary measures against the responding party, which may include no-contact requirements binding on both parties, timetable or campus separation, restriction of duties (for staff), or suspension from attendance or from duties pending investigation where no lesser measure would adequately protect the community. Precautionary measures shall be risk-based, proportionate, imposed for the shortest period necessary, reviewed at least fortnightly, and communicated with the express statement that they are protective steps and not findings; a suspension pending investigation shall be on full pay for staff and without academic penalty for students.

7. INVESTIGATION, STANDARD OF PROOF AND OUTCOMES

- 7.1** Internal reports shall be investigated by a trained investigator having no prior involvement with either party, appointed by the Wellbeing Team Leader (for student respondents) or the Group HR Executive Lead (for staff respondents). The investigator shall gather accounts and evidence fairly from both parties and from witnesses; both parties shall be entitled to be accompanied at any meeting, to know the substance of the evidence relevant to them, and to comment upon it before conclusions are reached; findings of fact shall be made on the balance of probabilities; and the investigation shall conclude within thirty working days wherever possible, with both parties updated at least fortnightly and any extension explained in writing. Questioning shall always avoid irrelevant enquiry into the reporting party's sexual history or character, which shall not be admitted as evidence of consent.
- 7.2** Where the police are investigating the same facts, the Academy shall liaise appropriately and shall pause those internal investigative steps, and only those steps, which the police specifically request it to pause; support and precautionary measures shall continue throughout, and the internal process shall resume immediately when permitted, since

the criminal process — with its different standard of proof and purpose — neither replaces nor exhausts the Academy's own duty to protect its community. An acquittal, a decision not to charge or a discontinuance shall not of itself determine the outcome of the Academy's process.

- 7.3** Outcomes shall be determined as follows: for student respondents, under the Student Discipline Procedure and, where the University of Wolverhampton's regulations are engaged, under the University's processes, with available outcomes up to and including permanent expulsion, and with the University informed as the partnership requires; for staff respondents, under the staff disciplinary procedure conducted with group HR, with available outcomes up to and including summary dismissal, together with referral to the Disclosure and Barring Service, the LADO and any professional regulator where the legal tests are met under the Safeguarding and Prevent Policy; and for contractors and visitors, exclusion from the Academy and termination of engagement. Both parties shall receive the outcome, with reasons, to the fullest extent that data protection law permits, in person where they wish it and in writing in every case, together with a clear statement of the applicable appeal route and time limit.

8. CONFIDENTIALITY, RECORDS AND REPORTING

- 8.1** Information concerning any matter under this policy shall be shared only with those who need it for the purposes of support, protection, investigation or determination, and every person to whom it is disclosed shall be reminded of its confidential character. The Academy shall not use non-disclosure agreements in connection with complaints of sexual misconduct; the only confidentiality expectations applied to the parties are those strictly necessary to protect the fairness of a live process and the privacy rights of individuals, and they shall never prevent the reporting party from discussing their own experience or seeking support. Anonymised data on volumes, categories, timeliness and outcomes shall be reported each term to the Student Support, Safeguarding and Wellbeing Committee and annually to the Board of Directors and shall inform the prevention program under Section 3. The Wellbeing Team Leader (for student-related disclosures and reports) and the Group HR Executive Lead (for staff-related matters) are responsible for creating, maintaining, and securely storing all relevant records under this policy, in accordance with the IT, Data Protection and Data Security Policy.

9. PART B — STAFF–STUDENT PERSONAL RELATIONSHIPS

- 9.1** Staff hold power in relation to students — over assessment, progression, references, support and opportunity — and genuine, freely given consent is compromised where power is unequal. This Part therefore regulates personal relationships in order to protect students from exploitation, to protect staff from misunderstanding and allegation, to protect other students from actual or perceived favoritism, and to protect the integrity of every academic judgement the Academy transmits to the University of Wolverhampton. In this Part, professional responsibility means any current teaching, assessment, supervision, personal academic tutoring, wellbeing support, safeguarding, disciplinary or administrative authority in relation to the student concerned.

- 9.2** The following rules have effect: it is absolutely prohibited for any member of staff to form, seek or continue an intimate, romantic or sexual relationship with any student for whom they hold professional responsibility, and this prohibition cannot be cured by disclosure or declaration, the relationship itself constituting gross misconduct; it is absolutely prohibited for any member of staff to form, seek or continue any such relationship with any student who is under eighteen or an adult at risk, such conduct additionally engaging the criminal law on positions of trust and the procedures of the Safeguarding and Prevent Policy; any intimate relationship between a member of staff and a student for whom they hold no professional responsibility — including a relationship predating either party's connection with the Academy, as where a spouse or partner enrolls as a student — shall be declared in confidence to the Principal through the declaration route in the Conflicts of Interest Policy within five working days of the relationship or the enrolment, whichever is later; and upon any declaration the Principal shall arrange matters so as to eliminate every professional connection between the parties, recording the arrangements made, and shall do so in a manner that causes no disadvantage to the student.
- 9.3** Beyond formal relationships, staff shall maintain the professional boundaries set out in the Code of Conduct in the Safeguarding and Prevent Policy, including the prohibitions on private social contact, personal-channel communication, lending or borrowing, and significant gifts. Failure to declare a declarable relationship, or breach of any prohibition in clause 10.2, is gross misconduct; and no disciplinary consequence shall attach to any student under this Part, responsibility for compliance resting entirely with staff. A student who is concerned about the conduct of a member of staff towards them, or towards another student, may raise it through any route in Section 4, and shall be supported in accordance with this policy in every respect.

10. GOVERNANCE AND REVIEW

- 10.1** The Wellbeing Team Leader and the Group HR Executive Lead are jointly responsible for the operation of this policy and shall report on it annually to the Board of Directors; the Student Support, Safeguarding and Wellbeing Committee shall monitor its student-facing operation each term; training completion shall be tracked within the matrix in the Safeguarding and Prevent Policy; and this policy shall be reviewed annually, having regard to current regulatory expectations concerning harassment and sexual misconduct in higher education, to the outcomes of matters handled under it, and to the anonymised feedback of those who have used it.