

NILE Anti-sexual harassment and misconduct policy

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1. Policy aim

This policy outlines NILE’s commitment to preventing and addressing sexual misconduct and sexual harassment, including staff-to-student and student-to-student instances. It aligns with Condition E6 of the Office for Students (OfS) registration conditions, is informed by guidance from Universities UK, and aims to create a clear and fair process to prevent, report and address incidents of sexual harassment and misconduct.

This policy applies to all members of the NILE community, including course participants, contracted and freelance staff, and visitors, covering:

- On-site activities
- Off-site activities
- Online interactions related to NILE’s activities.

2. Definitions

Sexual Misconduct: includes, but is not limited to, sexual harassment, sexual violence, unwanted sexual advances, and coercion.

Sexual Harassment: is any unwanted conduct of a sexual nature that violates dignity or creates an intimidating, hostile, degrading, or offensive environment.

Consent: is agreement by choice, and having the freedom and capacity to make that choice. Consent must be voluntary, explicit, and obtained prior to any and all sexual activity. consenting to sexual activity with an individual in the past does not mean you automatically consent to any future sexual activity.

3. NILE principles

1. **Zero tolerance:** NILE has a zero-tolerance approach to sexual misconduct and harassment.
2. **Victim-centred:** Reporting methods, support and processes are centralised around the needs of those affected by any alleged acts, and designed to cater to them effectively yet sensitively, and with minimal procedural friction.
3. **Fairness:** Our approach is designed to ensure due process for all parties involved in any report.

4. **Confidentiality:** Our approach protects the privacy of individuals to the extent possible (although complete confidentiality cannot always be guaranteed).

4. Roles & responsibilities

- NILE's Designated Safeguarding Person (DSP) and Designated Safeguarding Lead (DSL) are responsible for ensuring the implementation and oversight of this policy and any processes related to it. Ultimate responsibility lies with NILE's Director.
- All NILE community members – including staff, course participants and visitors - must comply with the policy and report instances of misconduct in line with the procedures outlined below.
- NILE's Safeguarding Team are responsible for handling individual reports, investigating them and providing support.

5. Reporting and Response Procedures

1. Making a report:

- Course participants can report incidents in person to the DSP or any member of the safeguarding team, either in person or by filling in an Incident Report Form found at the end of the Overarching Safeguarding Policy www.nile-elt.com/catalog?pagename=Policies.
- Alternatively, course participants can report anonymously via the INTO platform. <https://intostudy-preview.intoglobal.dev/en/company-policy-harassment-report-at-your-centre-nile> Please note, all reports submitted through this platform are sent directly to the NILE DSP and DSL, are dealt with confidentially, and are not seen or dealt with by INTO.

2. **Initial Response:** Any report will be assessed, and the NILE Safeguarding team provides immediate support as appropriate to the complainant.

3. **Investigation:** A thorough and impartial investigation follows.

4. Outcomes and Actions:

- Depending on the nature of severity of the conduct noted in any report, ultimate sanctions for those found to have perpetrated sexual harassment or misconduct will be a matter for the criminal justice system. NILE deals with each case proportionately and on its own merits, and may (for example) suspend course participants or staff whilst an investigation is ongoing. A range of sanctions are possible – again aligned to the circumstances of each individual report – from a mediated settlement between parties, to exclusion from study.
- Supportive measures for those affected, such as welfare support and academic accommodations: Again, these are dependent on individual circumstances of a case and tailored to the needs of the individual.

6. Staff-to-Student Misconduct

1. **Prohibition: Relationships of a sexual or intimate nature between staff and course participants are prohibited by NILE**, to avoid conflicts of interest and power imbalances, and in line with recommendations from OfS and other regulatory bodies.

2. **Prevention:** Via INTO, NILE provides mandatory training for staff on maintaining professional boundaries and recognising inappropriate conduct, as well as supporting potential victims.

3. **Reporting and Investigation:** Allegations against staff are handled as part of a collaborative process between the NILE Safeguarding team and the directors at NILE and, if necessary, referred to external authorities following investigation.

7. Student-to-Student Misconduct

1. **Education and Prevention:** NILE provides visible guidance materials at the centre and via the online platform to promote respectful behaviour between course participants, as well as information on consent and other relationship guidance.

2. **Mediation and Resolution:** Where appropriate, NILE may offer mediation as an outcome of an investigation following a report. More serious cases will result in formal disciplinary action, as outlined above.

8. Student-to-Staff Misconduct

1. **Prohibition: Relationships of a sexual or intimate nature between staff and course participants are prohibited by NILE**, to avoid conflicts of interest and power imbalances, and in line with recommendations from OfS and other regulatory bodies.
2. **Prevention:** NILE provides mandatory training for appropriate behaviour and relationships within the NILE community, including responding to inappropriate behaviour towards members of NILE staff and other external employees.
3. **Reporting and Investigation:** Allegations against course participants, and appropriate support for alleged victims, will be handled by the NILE Safeguarding Team in collaboration with NILE Directors and, if necessary, referred to external authorities following investigation.

9. Support

- NILE contracted staff members affected should seek support from their line managers, the welfare team and the directors, as necessary.
- For contracted members of NILE staff, confidential support can also be offered to affected individuals through the Benenden Insurance and Employee Assistance Programme, available through the Ben platform.
- Course participants can seek support from their course trainers and the NILE Safeguarding Team.

10. Monitoring and Review

This policy will be reviewed annually or as required to reflect changes in legislation, guidance, or institutional needs. Oversight of the review, implementation and provision of these policies is also maintained by NILE's Designated Safeguarding Person.