
Harassment and Sexual Misconduct Policy

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Approved by: Institute Leadership Group

dyson

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technology

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1.0 Policy statement

The Dyson Institute recognises that incidents of Harassment and Sexual Misconduct (as defined in section 1.1.0) are prevalent throughout society and acknowledges that there has been a noticeable increase in reporting across the Higher Education sector. The Institute is committed to preventing and eliminating harassment and sexual misconduct. This policy was created in consultation with the Dyson Institute Student Committee. Sexual Misconduct (HSM) refers to a broad spectrum of behaviours that cannot be divorced from other types of gender-based violence including, but not limited to, intimate partner violence or domestic abuse, coercive and/or controlling behaviour, and stalking. The Institute acknowledges that HSM can be experienced by any individual, regardless of their gender identity.

The Dyson Institute is committed to the Dyson Code and ensuring a safe working and learning environment free from HSM so that all members of the community can enjoy the right to study, live, work and be respected for the contribution they make. The Dyson Institute recognises that HSM can have a significant impact on the reporting individual, reported individual, their supporters, the wider community and beyond, and will seek to mitigate such impacts.

The Institute recognises that it must be proactive in creating and promoting a culture where:

- Incidents of HSM will not be tolerated
- Individuals have confidence in the sensitivity the Institute deploys
- Incidents are thoroughly and quickly addressed to ensure the preservation of a safe work and study environment
- Where students feel confident and empowered to disclose, will be listened to and understand the options available to them.
- The Institute will challenge HSM in all its forms.

Further support and information can be found by contacting the Safeguarding team DIETSafeguarding@dyson.com, on our single comprehensive source of information on the Institute Website and on the internal SharePoint page [here](#).

2.0 Scope of the Policy

Reports made under this policy are not limited to the Institute's premises or immediate geography. The Institute may investigate incidents that occur in other settings, including online or virtually.

The Institute reserves the right to investigate non-recent allegations of misconduct, where it is deemed appropriate and feasible to do so.

The Institute expects every Dyson global campus to provide a safe environment for student placements, and to take appropriate measures to prevent harassment and sexual misconduct. The Institute will seek to support the students in resolving the matter.

This Policy and its associated procedures are distinct from criminal investigations. The Institute's role is limited to determining whether there has been a breach of its internal codes of conduct or disciplinary policies.

This policy sets out the Institute's:

- Expectations of behaviour by our whole community of students, staff, volunteers and visitors supported by the Dyson Institute Community Charter and Dyson Code.
- Approach to preventing HSM through training and awareness.
- Approach to reports of HSM from anyone associated with the Institute.
- Aim to take prompt and appropriate action including evoking disciplinary procedures as required.
- Approach to the collection of relevant data to enable the monitoring of allegations. This information will be kept securely and confidentially and in line with Dyson's Data Protection Policy. This will include anonymised data sharing on a quarterly basis with the Institutes governing body Council.

Requirements relating to abuse of power and intimate personal relationships between staff and students are covered in the 'Staff and Student Relationship Policy'. The Dyson Institute prohibits staff from entering an intimate or sexual relationship with students at the Institute. Any breach would be reported to HR who will complete an investigation. The investigation could result in disciplinary action which may lead to dismissal of the relevant staff member.

Furthermore, any member of Institute staff entering an intimate or sexual relationship with a student under the age of 18 will be reported to the Local Authority Designated Officer (LADO) in accordance with the Dyson Institute Safeguarding Adults at Risk and Child Protection Policy.

2.1 Procedure

Under this Policy all students and Institute staff members who have experienced HSM will have equality of access to both internal (Sexual Violence Liaison Officer (SVLO) and counselling) and external specialist support (e.g. Sexual Assault Referral Centre and police).

The Institute staff will support the reporting individual in making an informed decision on the next steps. When the reported individual is a student, they will refer to the Student Disciplinary Policy and the Respect at Work and Study Policy Statement. Staff members of the Institute will be referred to the Dyson Respect at Work and Disciplinary policies will apply. Some incidents of HSM may also constitute a criminal offence under English law and will be referred to the Police where appropriate. Incidents of alleged HSM may therefore be addressed through criminal proceedings, internal disciplinary proceedings, or, in some cases, both criminal and internal proceedings.

The Institute may implement precautionary measures where necessary to protect the safety and wellbeing of students, staff, or the integrity of an investigation. More information on the implementation of precautionary measures can be found in the Student Disciplinary Policy. These measures are not sanctions and may include temporary suspension, non-contact arrangements, or restrictions on participation in certain activities. All measures will be subject to a risk assessment and reviewed regularly to ensure they remain appropriate and proportionate.

The decision to report an incident to the police rests with the reporting individual, unless the Institute makes the decision that there are serious safeguarding concerns or exceptional circumstances that justify reporting to the police without their consent. Reporting individuals will be provided with clear advice and guidance on all available options, including reporting to the police, pursuing an internal process, or both.

Where an alleged incident of HSM is referred to the police, the Institute reserves the right to risk assess where it is appropriate to put precautionary measures whilst there is an active criminal investigation on a case-by-case basis. Dyson may suspend employment during the investigation, which, in the case of a student, will also suspend continuation of studies. Alternatively, the disciplinary process may be suspended, and risk-mitigation measures are put in place until the criminal justice process is completed. This will be determined by Dyson HR and the Institute.

Definitions of terms referred to in this policy can be found in section 11.0.

3.0 Principles

The Institute holds the following set of Principles to reflect the commitment to establishing a culture of support and respect.

- We will treat all members of our community with dignity and respect, upholding the Dyson Institute Community Charter.
- We recognise the significant impact of all experiences of HSM, and acknowledge the potential detriment to studies and employment, regardless of when the experience occurred and respond accordingly.
- We strive to maintain equality and diversity within our community.
- We will actively respond to all first meetings, first disclosures and reports of HSM supporting the individuals making informed decisions.
- All reports considered under Section 6 procedures will be assessed on the balance of probabilities, in line with Policies e.g. the Student Disciplinary Policy Respect at Work and Study Policy Statement as well as current sector guidance.
- All Institute staff will have been informed of the policy and will be trained as appropriate to their roles. All staff involved in the process will always act with impartiality and discretion.
- Staff involved in the investigation of cases will be trained in trauma-informed practices to fulfil that responsibility.
- We believe that no person should suffer the effects of HSM alone, and will ensure that there is dedicated specialist support, including counselling for all individuals involved.
- We will work with local partners and key groups to forge positive relationships to support all our work in this area, from prevention to enquiry and post-incident care.
- In terms of experience and working with both internal and external experts, we will shape and respond to national and international policy and practice.
- We will regularly review relevant policies and practices.

3.1 Key principles

Staff are to respond with a trauma-informed approach responding with the 5 key principles:

- | • Principle | • Focus Explanation |
|------------------------------------|---|
| • Safety | • Prioritise physical and emotional security for all. |
| • Trustworthiness and Transparency | • Maintain open, clear, and honest communication and decision-making. |
| • Peer Support | • Value lived experience and foster mutual support. |
| • Collaboration and Mutuality | • Share power, foster partnerships, and include voices from all levels. |
| • Empowerment, Voice, and Choice | • Respect choice, encourage input, and build upon individual strengths. With no time pressure on the journey. |

All investigations will be carried out by staff who have been trained in trauma-informed investigation practices in order to be assigned to handle these cases.

3.2 Benefits

The Institute recognises that those that have experienced HSM will benefit most from:

- feeling believed
- being treated with dignity

- reassured that what happened was not their fault
 - being made to feel safe
 - being allowed to be in control of what happens next
 - making informed choices being able to speak to someone that is independent about what happened
-

4.0 Training – Prevention and Awareness

Preventing HSM is not the responsibility of the Reporting individual. The training and awareness sessions offered to students and staff focus on understanding what HSM is, how to intervene, and how to respond.

Education for students focuses heavily on understanding consent, respect and healthy relationships and active bystander intervention. Education for Institute staff focuses on building awareness around these issues, learning practical skills to respond to disclosures and how to support survivors.

4.1 Training

The Institute will provide training and run awareness sessions that are dedicated to the prevention and response of acts of HSM within its community. All students will complete annual training to support their understanding and identification of unacceptable behaviour, learning how to report these incidents and what to expect from the Institute in terms of support and potential investigations, and disciplinarys.

- The Institute commits to the delivery of a comprehensive curriculum, to enable students to feel empowered to fulfill their potential and promote a respectful, inclusive and supportive professional environment. Which includes but is not limited to Consent matters, bystander training, gender identity and inclusion, drugs and alcohol awareness, sexual health, harassment, wellbeing and mental health training.
- All students will complete refresher training for harassment and sexual misconduct at the start of each academic year; exceptions can be made for those who have previously been subjected to harassment or sexual misconduct.
- The institute will actively support students' participation in harassment and sexual misconduct training and monitor engagement levels, providing additional support or adjustments where required to increase participation.
- The HSM training has been designed and delivered by qualified and experienced SVLOs and safeguarding officers, and refers to sector and national research, lived experience and statistics.
- Efficacy is evaluated through engagement, completion and assessment throughout the training alongside post-completion feedback.
- The Institute has a specific, mandatory training programme for staff and regular workshops to enhance staff understanding and ability to receive disclosures and make referrals. This mandatory training includes the freedom of speech principles to ensure staff have a proper understanding of relevant free speech rights and responsibilities. Training includes assessment and feedback for evaluation.
- The Institute has identified staff who will undergo specialist training in order to undertake investigations and make disciplinary decisions delivered by external credible consultants.
- The annual #NeverOK campaign promotes awareness of the comprehensive source of information, harassment and Sexual misconduct.

All Dyson Technology and Dyson Institute staff and students are required to complete annual mandatory

Respect at Work Dyson training which identifies the importance of creating an inclusive environment. The Dyson Technology UK Respect at Work Internal Policy covers staff and The Institute's Respect at Work and Study Policy Statement can be read [here](#).

The Institute Student Support team is responsible for the organisation of training opportunities. Nominated student support liaison staff will work in partnership with the relevant representatives from the Dyson Institute Student Committee (DISC), they will ensure promotion and engagement with training and create awareness campaigns that maximise impact.

An annual report on the status of training compliance will be provided to Council to give assurance of what training has been provided and when it was completed. With monthly monitoring updates provided to IMB.

A minimum of two SVLOs are trained via an external agency to provide specialist support to students who have experienced sexual misconduct and will complete refresher training every three years alongside additional CPD to fulfil their responsibilities. These staff are supported by the DSL who has completed SVLO manager training. The SVLO Manager and SVLOs involved in undertaking the Sexual Misconduct Risk and Needs Assessment (SMRANA) and all members of Panels should receive relevant training around risk and needs assessment and management relating to sexual misconduct, and it is recommended that this is updated at least every three years.

5.0 Support and Report

5.1 Reporting

The Institute has clear processes in place for all students to report and disclose incidents of recent and non-recent harassment and sexual misconduct. Any member of the Dyson Institute community who has been subjected to, or observed, an act of HSM is encouraged to report the incident in whichever manner they feel appropriate to them. SVLOs can provide guidance and support, so that individuals reporting sexual misconduct can make an informed decision about what information to share with whom and how this information will be handled/investigated. Safeguarding officers (SO) can support disclosures and reports of all types of harassment and sexual misconduct. The Institute will support individuals who wish to report an incident to the police:

The options for support and report are:

- Using the Safeguarding and Prevent portal on [the Hub](#), selecting Sexual Misconduct Support Service or Safeguarding for harassment
- to an SVLO
- to a member of the Institute's safeguarding team in D5
- to any member of Institute staff
- to a member of the Dyson Human Resources Team
- to Dyson Security (<https://dysononline.sharepoint.com/sites/GroupSecurity>)
- anonymously via Dyson's [Speak Up](#)

The Institute would not typically report an allegation without the consent of the individual who raised it, unless there is a perceived risk to other students or the wider community, in which case a report may be necessary.

In the event a crime of serious sexual assault has occurred, you are encouraged to contact the Police via 999 or 101 as well as reporting to a member of staff, the SVLO team are available to support with contacting the police and sexual assault services.

Any report that involves an under 18 will be reported to the police directly or via the relevant local Multi-agency Safeguarding Hub (MASH). Any report against a member of staff involving an under 18 will be reported to Wiltshire Council Local Authority Designated Officer (LADO) via the Designated Safeguarding Lead. All reports against a member of staff will follow the Dyson Investigation process and will be treated in accordance with the relevant Dyson policies.

If we receive anonymous reports or reports made by student representatives or third parties, for example third party reporting centers, we will share the details of the reported individual with HR if they are an employee.

5.2 Supporting

The Dyson Institute is fully committed to supporting those that may have been subjected to sexual misconduct and witnesses of recent or non-recent HSM, support will also be provided to students with an allegation against them. The SVLO team aim to have a member available during office hours throughout the year in person and online.

This includes but is not limited to:

- Managing absence reporting if required.
- Support in decisions around continuation, suspension or cessation of study.
- Provide a liaison service between the student and external services and internal departments.
- Making changes to students' timetables where appropriate.
- Granting extensions to deadlines or providing alternative assessment options where assessment is impacted, including consideration at examination boards.
- Providing regular meetings with the Student Support Advisor(s) and/or SVLOs.
- Making referrals to support services, such as talking therapies with Institute or Dyson Technology service providers.
- Accompanying members of the Institute community to attend a police station or Sexual Assault Referral Centre (SARC) to make a report.
- Completing a risk assessment to minimize and mitigate risk to all parties

Outside of these working hours, students are encouraged to visit the Institute Hub – [Student Support pages](#) for a comprehensive source of information, advice and guidance.

The SVLO cannot represent the students if they are also their dedicated Student Support Advisor. If the Reporting and Reported individuals are both students, the same SVLO cannot support both parties, alternative SVLOs will support.

6.0 Investigating and Risk Assessments

Investigations must be impartial, thorough and unbiased in accordance with the OfS E6.10, no restricting provisions will be placed in any contract relating to restricting the disclosure of information from any student in making an allegation of HSM. The Dyson Institute confirms it will never use a Non-Disclosure Agreement (NDA) for any purpose relating to a case of HSM.

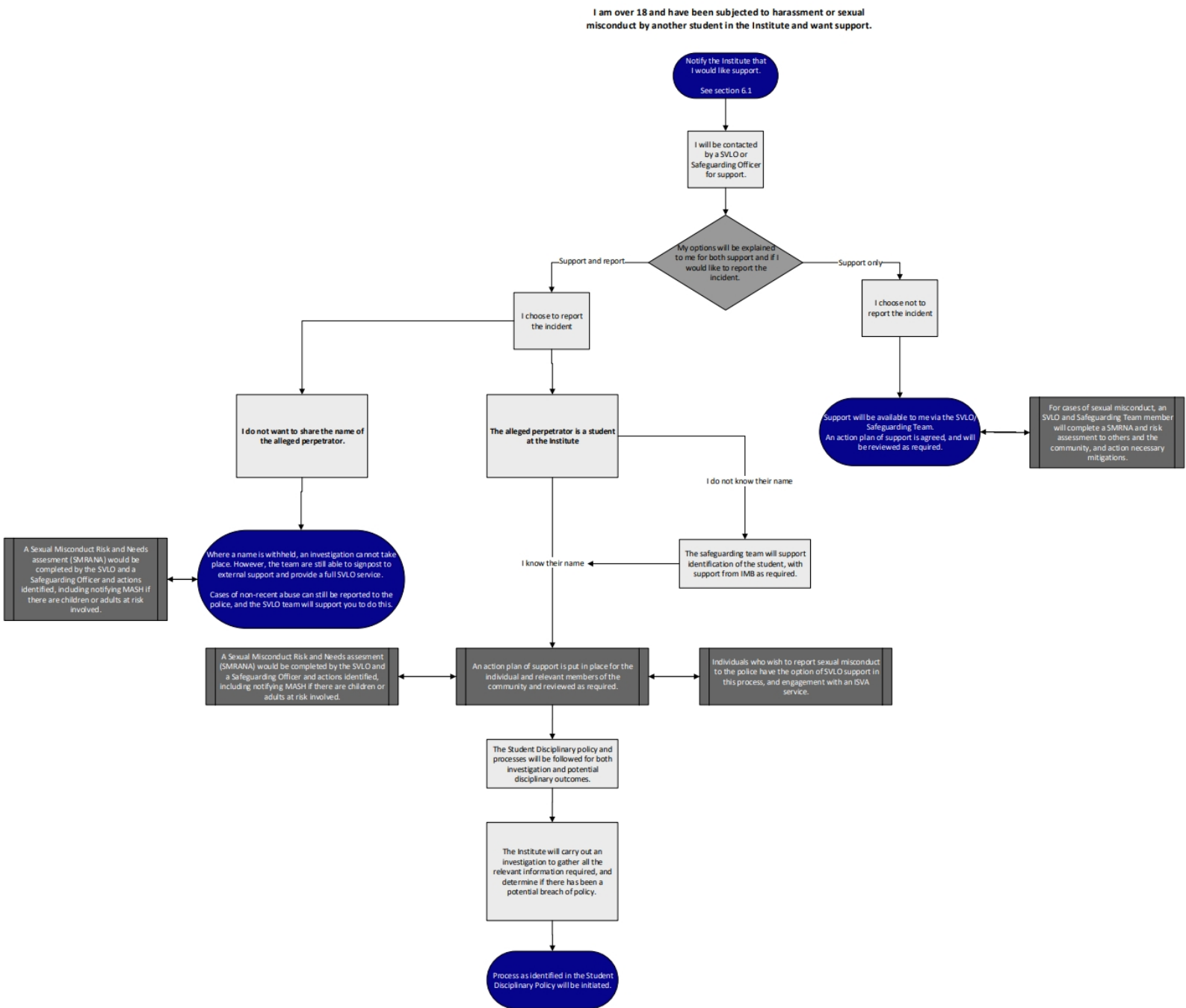
For students over the age of 18:

6.1 Where the allegation is made against another student

- The SVLO or Safeguarding team will respond with an initial meeting with the disclosing individual.
- If the disclosing individual wishes to make a formal report to the Institute, the safeguarding team will take a

statement which may be used in the subsequent investigation.

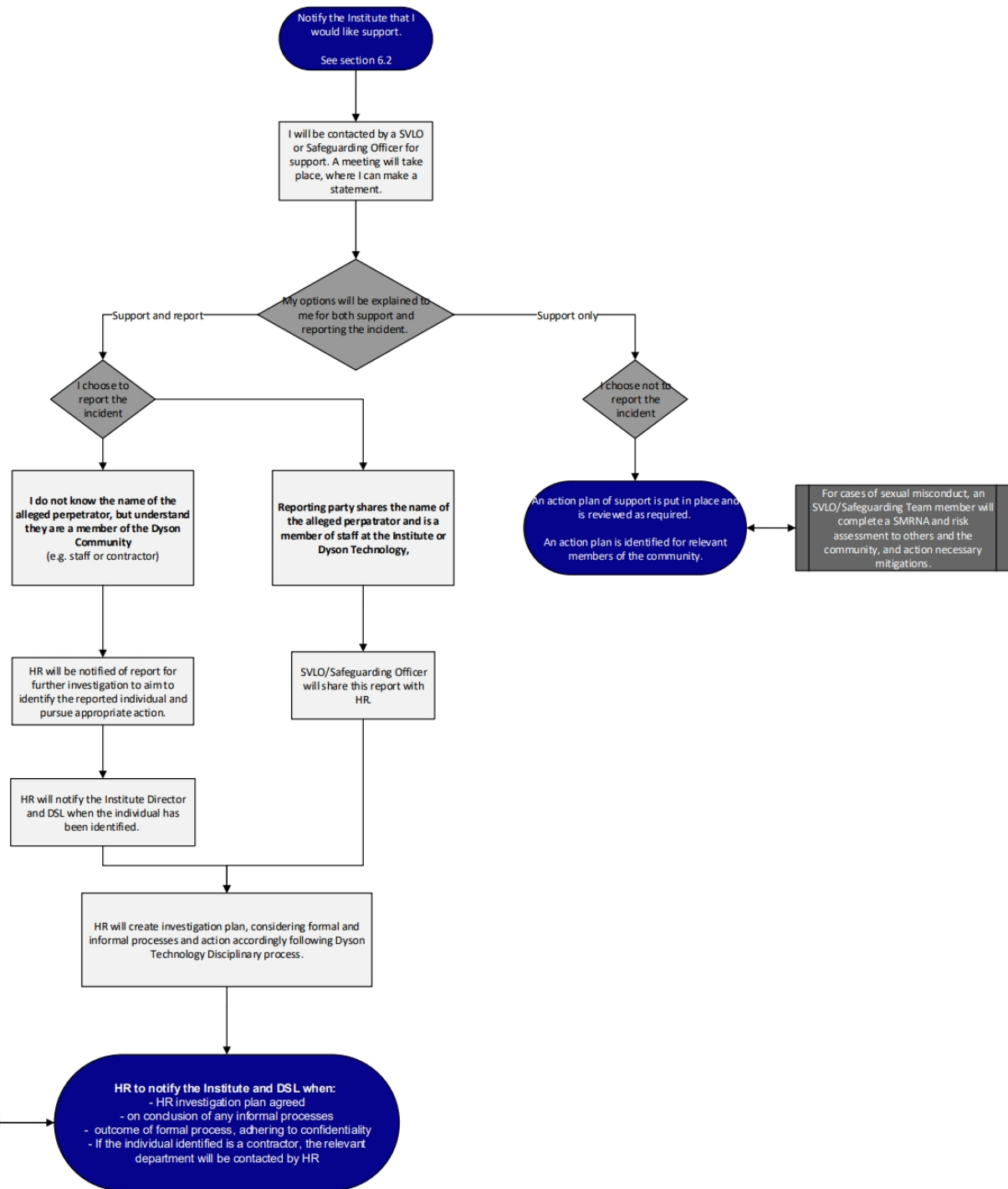
- Support will be available via the SVLO or Safeguarding Team and an action plan of support agreed.
- The reported individual will be offered support via the SVLO service, this must not be the same SVLO which is supporting the reporting individual.
- The Student Disciplinary Policy and processes will be followed for both investigation and potential disciplinary outcomes.
- The Institute will carry out an investigation to gather all the relevant information required and determine if there has been a potential breach of policy. It is not to prove or disprove whether a criminal offence has occurred under UK legislation, this is the responsibility of a criminal justice investigation. Individuals who wish to report sexual misconduct to the police have the option of SVLO support in this process and engage with an ISVA service (Independent Sexual Violence Adviser).
- SMRANA will be completed (See sect 6.6) by the panel Members of the SMRANA panel will include:
 - A member of the Institute Management board, usually the Secretary and registrar.
 - Designated Safeguarding Lead
 - SVLO s who are involved in delivering support to the relevant parties.
 - Any risks to others or community members identified and mitigated.



6.2 Where the allegation is made against a member of Dyson Institute or Dyson Technology staff or a contractor thereof:

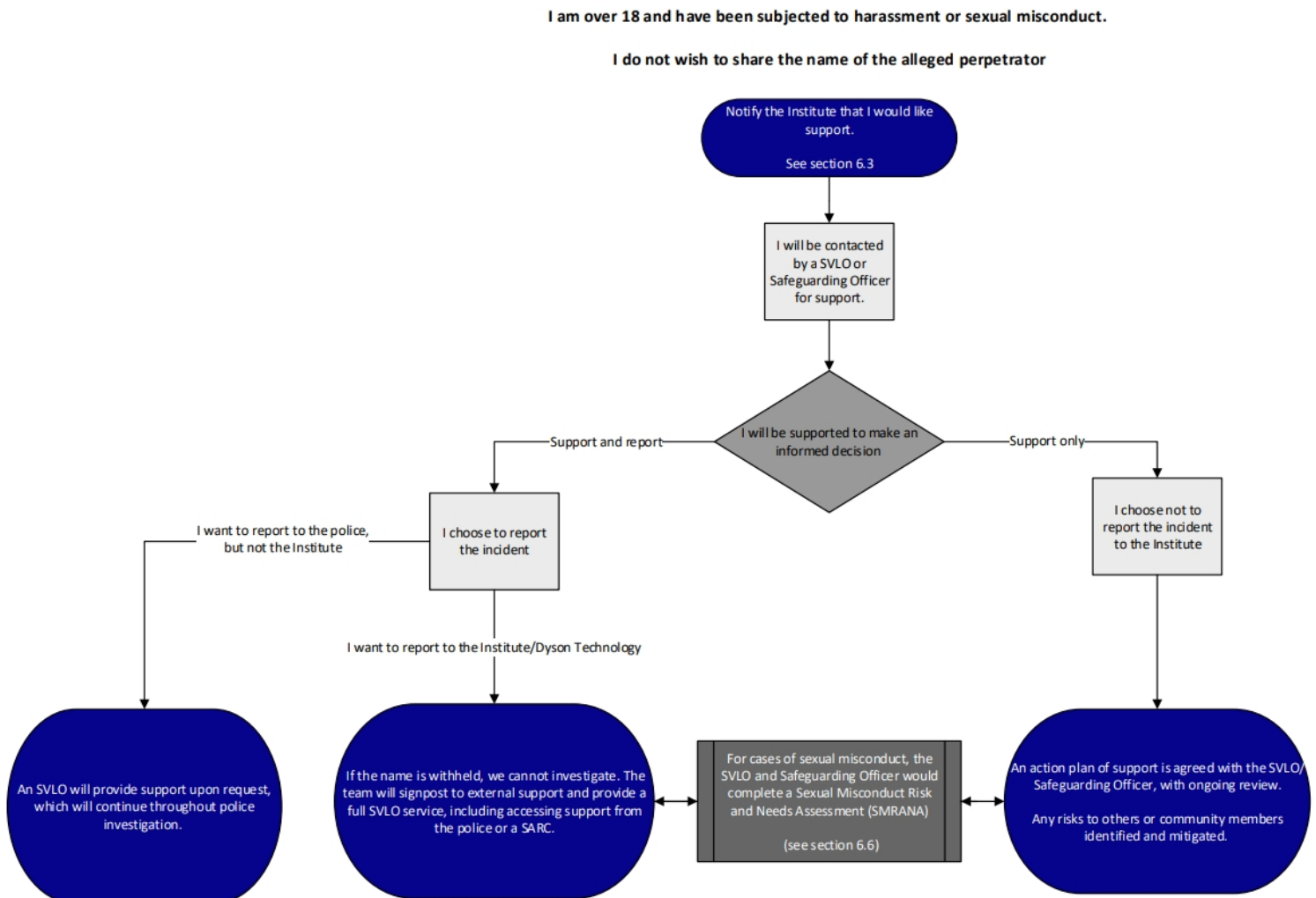
- During the initial meeting with the SVLO, the student can make a statement.
- the SVLO will notify the DSL and Institute Director who will then liaise with HR.
- Where an allegation is made against a member of Dyson Institute or Dyson Technology staff, the SVLO or Safeguarding Officer will share the report with HR.
- If the reporting individual doesn't know the name of the alleged perpetrator but believe them to be a member of the Dyson Community (e.g. staff, contractor), the SVLO/Safeguarding officer would notify HR for further investigation, aiming to identify the employee or contractor and pursue appropriate action. HR will notify the Institute director and DSL when the individual has been identified.
- Once the alleged perpetrator is identified as a member of Dyson Institute or Dyson Technology staff, HR will notify the Institute Director and DSL when:
 - An investigation plan has been agreed to determine the appropriate route to be taken, and again
 - on conclusion of any informal processes.
 - If the process moves to a formal route, the HR team will notify upon the outcome of that process, adhering to confidentiality.
 - If the individual identified is a contractor, the relevant department will be contacted for investigation and action.
- The reporting individual will be supported by an SVLO or other member of the student support or safeguarding team on their request to any meetings as part of the investigation process.
- Where possible the HR team will use the reporting individuals' statement to minimise the need for repetition and reduce the risk of re-traumatizing.
- The Internal Dyson Disciplinary policy is used for all allegations against a member of staff from Dyson technology or Dyson Institute, staff and students may refer to this policy, available on Motor, for investigation procedures and outcomes.
- SMRANA will be completed (See sect 6.6). by the panel Members of the SMRANA panel will include
 - Member of IMB, usually the Secretary and registrar
 - DSL
 - SVLO s who are involved in delivering support to the relevant parties
 - HR representative (This will not be the same representative which leads the investigation or disciplinary processes)
 - Any risks to others or community members identified and mitigated.

I am over 18 and have been subjected to harassment or sexual misconduct by a member of Institute or Dyson technology staff and want support.



6.3 Where the name of the alleged perpetrator is withheld:

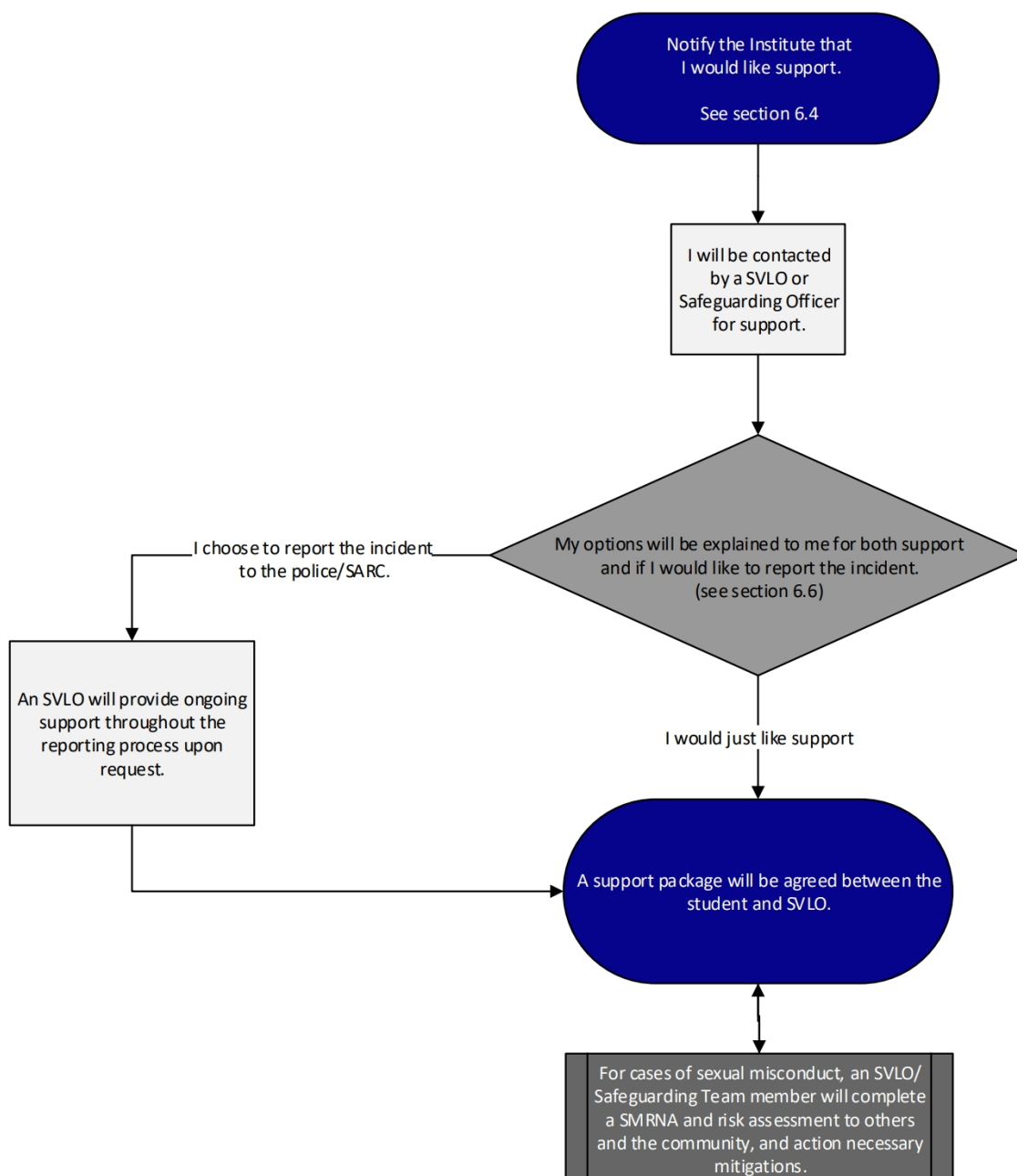
- The SVLO or Safeguarding officer will support the student to make an informed decision about the next steps, either a support package or consider formal reporting.
- Where the name of the alleged perpetrator is withheld, there would be no internal investigation. If the decision is taken to report, see steps 6.1 or 6.2.
- An action plan would be created between the student and the SVLO for support (See sect. 5.2)
- For cases of sexual misconduct, the responding SVLO and a safeguarding officer would complete a Sexual Misconduct Risk and Needs Assessment (SMRANA) (See sect. 6.6).
- If the student decides to report to the police but not the Institute or Dyson Technology, the SVLO will support them to do so upon request.
- The reporting individual would continue to receive support throughout the police investigation.
- Any risks to others or community members identified and mitigated.



6.4 Where the alleged perpetrator is not a member of the Institute or Dyson Technology community

- An internal investigation cannot take place; however, support will be provided if the student wishes to report to the police or SARC as preferred.
- Where the name of the alleged perpetrator is known and shared with Dyson Institute staff, and they are not a member of the Dyson Community, the SVLO will work with the reporting individual to determine their next steps for support and external reporting, this will include a SMRANA by the SVLO and DSL and monitored actions, (See sect 6.6).
- A support package will be agreed between the student and the SVLO.

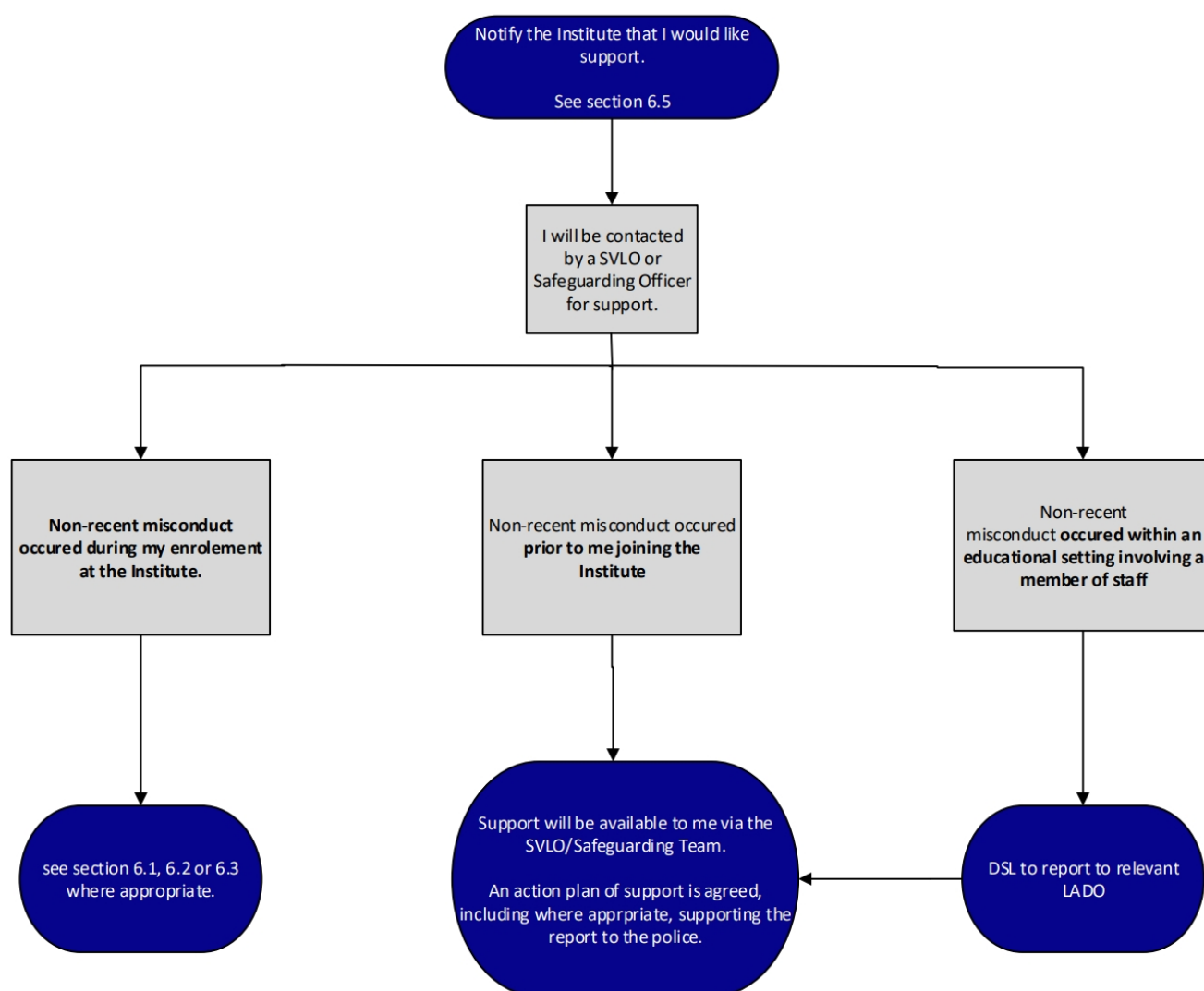
I am over 18 and have been subjected to harassment or sexual misconduct, by someone who is not a member of the Institute or Dyson Technology community and want support.



6.5 The disclosure refers to non-recent abuse

- The Institute will support students with disclosures of non-recent harassment or sexual misconduct.
- If the non-recent misconduct occurred during the students' enrolment at the Institute, then the same processes will be followed as above.
- If the non-recent misconduct occurred prior to the student's enrolment then a package of support will be agreed between the student and the SVLO, including where appropriate, supporting the report to the police.
- Where the non-recent abuse occurred within an education setting involving a member of staff, the DSL will report to the relevant LADO.
- Where the Institute is made aware of risk to an Adult at Risk, or child they will contact the relevant local authority Multi Agency Safeguarding Hub.

I am over 18 and have been subjected to harassment or sexual misconduct in the past and would like support



6.6 Sexual Misconduct Risk and Needs Assessment (SMRANA)

- The Institute uses the LimeCulture Sexual Misconduct Risk and Needs Assessment Tool.
- The SMRANA provides a consistent approach to risk and needs identification (and their management) which will enable better understanding of both parties' needs and assists in case management and prioritisation.
- The SMRANA can support the Institute to manage individual and organisational risks associated with cases of sexual misconduct from the point of initial report to the conclusion of any discipline process or the point at which parties may leave the institution.
- The SMRANA can also be used by the SVLOs when they work alongside Independent Sexual Violence Advisers (ISVAs) based in the community. It is purposely designed to work alongside the Safety & Support Assessment Toolkit which is a bespoke sexual misconduct risk and needs tool used by many ISVA service providers.
- The use of the SMRANA is not mandatory but is adopted by the Institute as part of our routine practice to support effective and consistent risk and need identification, inform the support put in place and the overall management of risk within the Institute.
- Benefit of SMRANA to the reporting party - The SMRANA is intended to be a dynamic Tool, that captures individual risk and needs on an ongoing basis through regular review. The main beneficiaries of the SMRANA will be the reporting parties, who will be provided with support from the Institute that is tailored to their individual needs and takes account of any risk of harm to themselves or others. In addition, if reporting parties are also using ISVA services or other specialist support services, the consistent, standardised collection of information will allow a more seamless delivery of support for the individual.
- The SMRANA is designed to be suitable for use with responding parties, and will work as a dynamic Tool, capturing their individual risk and needs on an ongoing basis through regular review. It is believed nationally that to date, responding parties may not have received the same level of attention to their needs as those who report sexual misconduct. However, the Institute accepts the same duty of care to those who are responding to such a report.
- Where the Panel considers the SMRANA for both parties, it will enable them to make balanced risk and needs management decisions paying due regard to both parties involved in a case.
- Universities aim to build a culture of safety and support for students and staff, and by using this Tool the Institute can ensure that risk and needs assessments associated with sexual misconduct are an integral part of our organisational management. This will ensure that our relevant organisational governance systems are working effectively, with risk management decisions being taken at the appropriate level and based on systematically gathered and evaluated information about risk.
- Any member of the SMRANA panel cannot lead the investigation, and the Institute will ensure that there are no internal conflicts. However, involvement by the SVLOs or DSL in the SMRANA panel does not negate the ability of those staff to support the individuals involved during the investigation.

6.7 Where the reporting individual is under 18 or an Adult at Risk:

- In addition to the relevant process above, where a member of Institute staff is the reported individual, the DSL must refer to the Wiltshire Local Authority Designated Officer (see Safeguarding Adults at Risk and Child Protection Policy).
- Where the reporting party is an adult at risk, the local authority will be notified, usually with consent from the reporting individual.

6.8 HR Investigations

Where HR are informed of incidents of HSM they will launch an investigation which will be investigated in accordance

with Dyson policies. Dyson's investigation will determine whether there has been a breach of any of Dyson policy. Dyson will carry out an investigation to gather all the relevant information required and determine if there has been a potential breach of policy. It is not to prove or disprove whether a criminal offence has occurred under UK legislation, this is the responsibility of a criminal justice investigation. Individuals who wish to report sexual misconduct to the police have the option of SVLO support in this process, and engagement with an ISVA service (Independent Sexual Violence Adviser).

6.9 Suspension

- It may be necessary to suspend an individual during an investigation. The Dyson Disciplinary Policy should be followed in this instance for information on staff Investigations and disciplinaries this is an internal Dyson document and can be accessed by students and employees via Motor online. The Student Disciplinary policy should be followed for information on suspension and other precautionary measures during an investigation, this policy is available on the Institute Website.
- Prior to or during a Dyson Technology HR investigation process, it may sometimes be necessary to suspend an employee. Normally this would only occur where there is a potentially serious issue of alleged misconduct, or where there is a risk to people or property. Suspension is not a prejudgment of the case or a disciplinary sanction.
- Suspension will normally be made on full pay and may happen at any stage of the investigation process depending on the circumstances.
- During any suspension, the employee should not visit Dyson premises, access Dyson systems or contact any of Dyson's customers, suppliers, contractors or employees, unless they have been expressly authorised in writing to do so.
- When a resident of Dyson Village is suspended, the Institute will complete a review to determine any associated risks and the necessary precautionary measures.
 - Precautionary actions may include requiring the suspended student to temporarily vacate their accommodation if the reporting student also resides in Dyson Village
 - The Institute will work with the suspended individual to ensure they have access to a safe alternative place to reside during the period of suspension.
 - The suspended student shall also ensure that the Safeguarding team know where you will be and how you can be contacted during each day (except during any periods taken as holiday in the usual way).
- As an alternative to suspension Dyson may require you to temporarily undertake your role, or alternative duties, in another location or with another team

7.0 Equality and Diversity

The Institute has a duty under the Equality Act 2010 to have due regard for the need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

HSM can be experienced by any individual, regardless of sex, gender, sexual orientation, relationship status, age, disability, faith, ethnicity, nationality and economic status. Women, members of the LGBTQ+ community, and individuals with disabilities are disproportionately affected by experiences of sexual misconduct.

Experiences of sexual misconduct may intersect with other forms of harassment and discrimination. The Institute follows Respect at Work and Study Policy Statement for students which addresses other forms of harassment, bullying and discrimination.

The Institute upholds its obligations of freedom of speech and academic freedom and addresses this in detail in the Dyson Institute's Freedom of Speech Code of Conduct for compliance with freedom of speech principles. The Institute pays regard to, and places significant weight on, the importance of freedom of speech within the law, academic freedom and tolerance for controversial views in the educational context, environment, premises and situations where educational services, events and debates take place.

The Institute applies a rebuttable presumption to the effect that students being exposed to the following is unlikely to amount to harassment:

- a. The content of Institute course materials, including but not limited to books, videos, sound recordings and pictures
- b. Statements made and views expressed by a person as part of teaching, research or discussions about any subject matter which relates to the content of the higher education course.

8.0 Roles and Responsibilities

8.1 The DSL is the SVLO Manager and is responsible for the application of the procedures associated with this Policy. There is an assigned Deputy SVLO manager who is also a trained SVLO.

8.2 The day-to-day management of the HSM Policy Procedure for Students will be overseen by the SVLOs in conjunction with the Safeguarding Team.

8.3 . The HR partners have key responsibilities for the application of the procedure where allegations involve staff or contractors and are an ex-officio member of the SMRANA panel

8.4 The Designated Safeguarding Lead, or Deputy Designated Safeguarding Lead in their absence has responsibility for engaging with the DOFA / LADO (Designated Officer for Allegations / Local Authority Designated Officer) where the allegation involves a student under the age of 18 reporting a member of staff or a student's allegation of non-recent abuse in a former education setting.

8.5 Where a report may amount to domestic violence or abuse, members of the SVLO's and Safeguarding team are trained to complete a DASH (Domestic Abuse, Stalking, and Honour Based Violence Assessment) risk assessment and use this as required as part of the Multi Agency Risk Assessment Co-Ordinator (MARAC) referral.

8.6 The Institute is only able to initiate an investigation and disciplinary procedures when the responding individual is a member of the Dyson Institute or Dyson Technology community.

9.0 Confidentiality

9.1 The SVLO team and Institute recognise and prioritise the importance of confidentiality, trauma-informed practice, compassionate communication and informed consent. Therefore, only critical information will be shared with other parties on a need-to-know basis and where it is reasonable and necessary to do so. Prior to a disclosure or report, it will be a priority for the SVLOs to explain what information may need to be shared to access the different support or initiate an investigation, for informed consent. Within this context, confidentiality may not be about keeping information secret but about sharing the minimum of what is needed to be shared to gain effective support in a timely manner.

9.2 The Institute reserves the right, and may be under an obligation, to share information in exceptional

circumstances, such as where disclosure is necessary to protect any individual or the wider Institute community from harm or to prevent a crime from taking place.

For example, where there remains a risk of harm to a child or adult at risk, and/or a serious risk of harm to the Reporting individual and/or wider community. In these cases, the Institute may be bound by law to report the incident to the relevant external authority.

9.3 All individuals involved in any process under this Policy must keep information that is disclosed to them, as part of the process, confidential. Any unauthorised disclosure of confidential information will be considered a Policy violation and will be addressed accordingly. Throughout all proceedings, the Institute will act in compliance with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

10.0 Related information

This Policy should be read in conjunction with the following Regulations, Policies and Procedures which can either be found internally or on the website linked [here](#):

- Fitness to Study Policy
- Grievance Policy (available to staff and students internally)
- Student Disciplinary Policy
- Respect at Work and Study Policy Statement
- Dyson Respect at Work Policy (available to staff internally)
- Safeguarding and Prevent Policy
- Safeguarding Adults at Risk and Child Protection Policy
- Staff and Student Relationship Policy
- Freedom of Speech Code of Conduct
- Dyson Code (available internally)
- Institute Community Charter (available internally)

Contact for further information: Safeguarding team DIETsafeguarding@Dyson.com

11.0 Definitions

Behaviours	The behaviours below can have a traumatising and damaging effect on those who experience them:
Harassment	has the meaning given in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997 (in its entirety, and as interpreted by section 7 of the Act) includes 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: <ul style="list-style-type: none">• age• disability• gender reassignment• race• religion or belief• sex

	<ul style="list-style-type: none"> • sexual orientation <p>The Institute would also consider harassment to include any incidents of physical violence towards another person(s) on the basis of a protected characteristic and hate crimes, such as those criminal offences, which are perceived by the victim or any other person to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity.</p> <p>The institute accepts the OfS definition of harassment to include domestic violence and abuse (which can also involve control, coercion, threats), and stalking. The OfS and Institute also consider harassment to include any incidents of physical violence towards another person(s) on the basis of a protected characteristic, and hate crimes, such as those criminal offences which are perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity.</p>
Sexual misconduct	<p>Is any conduct that is sexual, unwanted and causes distress, or that otherwise constitutes harassment, bullying or victimisation.</p> <p><i>Sexual misconduct includes but is not limited to:</i></p> <ul style="list-style-type: none"> • Rape, Sexual Assault, including by penetration or groping (Sexual Offences Act 2003) • Physical unwanted sexual advances, unconsented kissing, propositions and or demands for sexual favours including catfishing, or employing deception in order to induce someone into sexual activity. (Equality and Human Rights Commission: Sexual harassment and the law, 2017) • “Upskirting” is a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. (as defined by Voyeurism (Offences) Act 2019). • Recording and or 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) • Posting pornographic material in shared spaces (physical or virtual) or sending sexually explicit electronic communications. • Sextortion is a form of blackmail, Section 21 of the Theft Act 1968 only covers circumstances whereby a person, “with a view to gain for himself or another or with intent to cause loss to another, makes any unwarranted demand with menaces. • Conduct of a sexual nature which creates (or could create) intimidating, hostile, degrading, humiliating, or offensive environments for others including making unwanted remarks of a sexual nature 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). • Arranging or participating in events which may reasonably be assumed to cause degradation and humiliation to those who have experienced sexual violence, for example inappropriately themed social events or initiations. • Sexual coercion (unwanted sexual activity which happened because of being

	<p>pressured or coerced through non-physical means).</p> <ul style="list-style-type: none"> • Inappropriately showing sexual organs to another person (defined in the Sexual Offences Act 2003) • Repeatedly following another person without good reason – stalking in person or online. The warning signs of stalking are if the behaviour you are experiencing is Fixated, Obsessive, Unwanted and Repeated. (Protection from Harassment Act 1997) • Domestic abuse and coercive or controlling behaviour is a crime and is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those who are, or have been, intimate partners or family members regardless of gender, sexuality, or type of abuse.
Sexual Violence	is defined by the World Health Organisation (WHO) as “any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic or otherwise directed against a person’s sexuality using coercion, by any person regardless of their relationship with the victim, in any setting, including but not limited to home and work”.
Sexual Harassment	<p>Is defined by Section 26 (2) of the Equality Act, 2010 as “unwanted conduct of a sexual nature” which “has the purpose or effect of violating an individual’s dignity or intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics:</p> <ul style="list-style-type: none"> • Age • Disability • Gender reassignment • Race • Religion or belief • Sex • Sexual orientation
Intimate personal relationship	<p>The Institute uses the OfS’ definition of intimate personal relationship’ to mean a relationship that involves one or more of the following elements:</p> <ul style="list-style-type: none"> • physical intimacy includes isolated or repeated sexual activity; or • romantic or emotional intimacy
Complicity	Is any act that knowingly helps, promotes, or encourages any form of HSM by another individual.
Retaliation	May constitute any words or actions, including intimidation, threats, or coercion, made in response to disclosures or reports made under this policy or any related policy such as Dyson’s Grievance or Respect at Work policies.
Vexatious reporting	Involves the creation of persistent, unwarranted reports made under this policy or any related policy such as Dyson’s Grievance or Respect at Work policies, or a refusal to accept any reasonable decisions arising from the application of the accompanying procedures to this Policy.
Malicious reporting	Occurs when an individual shares an allegation(s) of HSM that the individual knows to lack a basis in fact.
Sexual Violence Liaison Officer (SVLO)	Is a member of staff who has undergone specific, specialist training to enable them to support students who have experienced sexual violence
First meeting	With an SVLO is to establish enough information as to direct immediate and

	future/ongoing support (therefore a full disclosure is not required) involves an individual choosing to tell anyone who is part of the Institute community about their experience of HSM not including significant or specific details (different from Report and disclosure).
First disclosures	Are where the victim/survivor tells any third party, in detail, for the first time.
Report	Is the sharing of information with a staff member of the Institute regarding an incident of HSM experienced by that individual for the purposes of initiating the investigation process by the Institute, as set out in this Policy and the accompanying procedures (different from first meeting and first disclosure)
Incidents	Includes, but is not limited to, circumstances where allegations or complaints are made to the provider about harassment and/or sexual misconduct; and the provider could reasonably be considered to have grounds for suspecting that harassment and/or sexual misconduct has taken place or is taking place.
Allegation	Where a member of the Dyson Institute community is the reported individual.
Reporting individual	is the person(s) who has been the subject of the alleged incident of Sexual Violence and Misconduct or other policy breach.
Consent	Is affirmative, conscious, voluntary and revocable. It is the agreement by choice where the individual has both freedom and capacity to make that choice. Consent cannot be assumed on the basis of previously given consent.
Coercion	Is when someone is pressured unreasonably for sex, which can include manipulation.