

**SAFEGUARDING STAFF AND STUDENTS** 

UNIVERSITY OF WOLVERHAMPTON SEXUAL MISCONDUCT AND HARASSMENT FRAMEWORK



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# **FRAMEWORK**

The University of Wolverhampton ('the University') is committed to providing a positive work and study experience for all of our staff, students, apprentice learners and visitors. Everyone should feel safe, with us providing an environment that is free from discrimination and affirms the rights of all its members to be treated with dignity and respect.

The University recognises that incidents of Sexual Misconduct and Harassment occur within the University community, and acknowledges that there has been an increase in the number of incidents disclosed by our student community, a trend that is encouraged and reflected across the Higher Education sector and beyond.

The university has a zero-tolerance approach to Sexual Misconduct and Harassment.

#### The Sexual Misconduct and Harassment Framework

The Sexual Misconduct and Harassment Framework has been implemented by the University to provide a framework to oversee its response to the handling of allegations of sexual misconduct and/or harassment relating to staff, students or apprentice learners, however any investigation into the allegations would fall within the University's established policies and procedures for the handling of complaints:

- Dignity at Work and Study Policy; and
- Student Code of Conduct and Disciplinary Procedure

The Framework sets out how the University will deal with allegations of Sexual Misconduct and/or Harassment made against staff, students or apprentice learners.

## **Applicable Policy and Procedure**

#### Sexual Misconduct and Harassment Framework Procedure for Staff

This Procedure applies in the following circumstances:

- Where the Reporting Party is a staff member and the alleged behaviour is against another staff member.
- Where the Reporting Party is a student or apprentice learner and the alleged behaviour is against a staff member.

The correct investigative mechanism for this Procedure is the **Dignity at Work and Study Policy** ('The Policy').

As the Responding Party is a member of staff the investigation will fall within the remit of the Human Resources Directorate.

## Sexual Misconduct and Harassment Procedure for Students and Apprentice Learners

This procedure applies in the following circumstances:

• Where the Reporting Party is a staff member and the alleged behaviour is against a student or apprentice learner.

• Where the Reporting Party is a student and the alleged behaviour is against another student or apprentice learner.

The correct investigative mechanism for this Procedure is the **Student Code of Conduct and Disciplinary Procedure** ('The Code').

As the Responding Party is a student or apprentice learner the investigation will fall within the remit of the Conduct and Appeals Unit.

# **Scope of the Framework**

The Framework applies to all alleged incidents, disclosed or reported, of Sexual Misconduct and/or Harassment.

The <u>University Safeguarding Policy</u> will also apply if the reporting person is under 18 or a vulnerable adult.

This procedure does not cover incidents of non-sexual harassment as the University has a separate policy, <u>Bullying & Harassment Policy and Procedure</u> in relation to those matters.

If a conflict arises between this procedure and any other procedures of the University, then the Lead Sexual Misconduct and Harassment Officer (LSMHO), the University Secretary, shall determine which procedure will be used.

#### **Definitions**

#### Sexual Misconduct and Harassment

Sexual misconduct and harassment can involve a range of inappropriate and unwanted behaviours and acts of a sexual nature. It covers:

- all forms of sexual violence, including sex without consent;
- sexual abuse (including online and image-based abusive content);
- non-consensual sexual touching;
- sexual harassment (unwanted behaviour of a sexual nature which violates your dignity; makes you feel intimidated, degraded or humiliated or creates a hostile or offensive environment);
- stalking:
- abusive or degrading remarks of a sexual nature; and
- a vast range of other behaviours.

The definition of inappropriate sexual behaviour and violence may also include one or more of the following common signs:

- When a person is no longer interested in sexual activity after initially consenting to the
  act, but the other person continues to engage in sexual activity (e.g. touching, kissing,
  intercourse);
- When a person makes inappropriate sexual remarks in private or public places;
- When a person makes unwanted sexual advances (e.g., grabs, or attempts to touch);
- Unwanted kisses or hugs, considered more than would be appropriate to express affection:
- Masturbation and or exposure in public;

Intimidation and/or the distribution of personal content and/or footage online.

The following definitions also apply:

#### Consent

Consent is defined as the agreement to participate in a sexual act where the individual has both the freedom and capacity to make that decision. It is important to recognise that consent cannot be assumed based on a previous sexual experience or previously given consent, and consent may be withdrawn at any time.

#### Freedom to consent

For consent to be present, the individual has to freely engage in a sexual act. Consent is not present when submission by an unwilling participant results from the exploitation of power, or coercion or force, regardless of whether there is verbal or physical resistance.

### Capacity to consent

Free consent cannot be given if the individual does not have the capacity to give consent. Incapacitation may occur when an individual is asleep, unconscious, semi-conscious, or in a state of intermittent consciousness, or any other state of unawareness that a sexual act may be occurring. Incapacitation may also occur on account of a mental or development disability, or as the result of alcohol or drug use.

#### Coercion or Force

Includes any physical or emotional harm or threat of physical or emotional harm which would reasonably place an individual in fear of immediate or future harm, with the result that the individual is compelled to engage in a sexual act.

# Alcohol and/or Drug Use

Incapacitation arising from alcohol or drug consumption should be evaluated on the basis of how the alcohol/drugs have affected the individual; signs of incapacitation may include, but are not limited to, one or more of the following:

- slurred speech,
- unsteady gait,
- bloodshot eyes,
- dilated pupils,
- unusual behaviour,
- blacking out,
- a lack of full control over physical movements,
- a lack of awareness of circumstances or surroundings, and/or
- an inability to communicate effectively.

Intoxication is never a defense for committing an act of Sexual Violence and/or Misconduct, or for failing to obtain consent. If there is any doubt as to the level or extent of one's own or the

other individual's incapacitation, the safest approach is to not engage in a sexual act.

#### **Disclosure**

Disclosure means that an individual tells a member of the University community (such as student or staff member), that they have experienced Sexual Misconduct and/or Harassment (different from a formal complaint).

# Report

Is the sharing of information with a staff member of the University regarding an incident of Sexual Misconduct and Harassment experienced by that individual for the purposes of initiating the investigation process by the University (different from Disclosure).

# **Reporting Party**

Is the person(s) who has been the subject of the alleged incident of Sexual Misconduct and Harassment.

## **Responding Party**

Is the person(s) whose behaviour it is alleged, amounted to an incident of Sexual Misconduct and Harassment.

# **Equality and Diversity**

The University has a zero-tolerance approach towards any form of unlawful discrimination, prejudice, bullying and harassment, and is committed to ensuring all people are treated with dignity and respect regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

The University of Wolverhampton recognises that Sexual Misconduct and/or Harassment may intersect with other forms of harassment and discrimination.

# **Roles and Responsibilities**

The University Secretary is the Lead Sexual Misconduct and Harassment Officer (LSMHO) and is responsible for the application of this Framework. The Director of Health, Safety and Resilience is the Deputy Lead Sexual Misconduct and Harassment Officer (DLSMHO).

Each Faculty Dean, Professional Services Director, Heads of Departments/Schools, and all other leaders and managers have a duty to familiarise themselves with this policy, and to make every effort to ensure that Sexual Misconduct and/or Harassment does not occur, particularly in the areas of work for which they are responsible.

# Reporting

We will actively respond to all reports of Sexual Misconduct and/or Harassment. The University recognises that some experiences may constitute a criminal offence, and we will ensure that, in all cases, reports are carefully and thoughtfully addressed by appropriately trained staff members through a process that is transparent and clearly communicated to the individuals involved. The

complaint will be investigated promptly and objectively. Investigations will be objective and independent.

To distinguish the University process from a criminal law process, the University refers to sexual violence, sexual harassment and sexual abuse as sexual misconduct throughout the disciplinary process. The use of this term is not intended to trivialise what has happened; sexual misconduct is a term which captures all types of sexual violence, from rape and sexual assault, to stalking, harassment and abuse.

The term 'misconduct' is used to highlight the difference between a police investigation under the criminal law, and an investigation by the University under its applicable policy and procedures.

We will ensure that both the reporting party (person(s) who has made a formal complaint regarding an experience of sexual misconduct), and the responding party (person(s) named in a formal complaint who is alleged to have committed an act of sexual misconduct), are listened to, and responded to in a safe, supportive, trusting environment.

The University remains committed to prioritise the safety and wellbeing of the parties involved, whilst ensuring the dignity of all those involved in any investigation or disciplinary proceedings. We will respect the right of the individual disclosing an experience to choose how to take forward a disclosure, including the decision not to make a formal complaint.

#### **Timescales**

Whilst every effort will be made to comply with timescales, due to the complexity and or specific circumstances of a case, timescales may be extended. In such circumstances the individuals concerned will be advised of the reasons for any delay. Consideration needs to be given to the nature of the investigation, the collation of evidence, number of witnesses involved, external criminal investigations (if applicable) which may cause unavoidable delays.

#### **Documentation**

It is important that notes are kept at all stages of this procedure.

Where the University embarks upon an investigation it is important to note that, any information or material gathered during that investigation, may be likely to be requested by the Police in any future criminal proceedings. For those undertaking such an investigation it is therefore important to ensure that the investigation will withstand the scrutiny to which it might be subjected in the Criminal Justice process at a later date.

The Criminal Procedure and Investigations Act 1996 (CPIA) Code of Practice applies.

An important aspect of the CPIA is that it sets standards and procedures for investigators that:

- Regulate the investigation process
- Regulate the recording and retention of material that is found or is generated in the course of an investigation.

"Persons other than police officers who are charged with the duty of conducting an investigation as defined in the Act are to have regard to the relevant provisions of the code, and should take these into account in applying their own operating procedures." The CPIA Code of Practice 20

Guidance on such investigations can be obtained from the Office of the University Secretary.

A member of the University community may decide to submit a complaint which may result in the invoking of the disciplinary process, which could result in an investigation and discipline panel hearing, and at a later date, potentially some years hence, make a decision to report the sexual misconduct to the police. This would trigger a police investigation, where it is likely that all materials held by the University will be sought. This would include investigation materials.

## Police investigations and judicial proceedings

The Framework is designed to support the Reporting Party to disclose or report incidents of Sexual Misconduct and/or Harassment to the University, and to support the Reporting Party when they choose and assess the course of action that is most appropriate for them.

Where a criminal investigation or judicial proceedings are ongoing or are likely to commence in respect of a Disclosure or Report, the University can receive a Report of Sexual Misconduct and/or Harassment. In the interest of not causing impediment to the criminal proceedings, the University will not commence an internal investigation or will suspend an ongoing investigation. In all instances the University will undertake necessary precautionary action.

Reports of alleged incidents of Sexual Misconduct and/or Harassment will be considered at an Initial Review Meeting (IRM) including situations where the Reporting Party chooses not to report the matter to the Police. An IRM may also be called after the conclusion of a criminal investigation or judicial proceedings where there are issues outstanding which are pertinent to a member of staff, student, or apprentice learner.

A decision by the Police or Crown Prosecution Service (or other law enforcement agency) to take no further action in relation to a criminal matter or an acquittal at a trial does not preclude the University from taking action under any procedure and does not mean the Reporting Party has made a vexatious or malicious report.

In all cases, the University will advise the Reporting Party that it does not have the legal investigatory powers of the Police, and cannot make a determination on criminal guilt. An internal investigation is focused exclusively on whether a breach of the established University policies and procedures has occurred.

The internal process cannot therefore be regarded as a substitute for a Police investigation or criminal prosecution.

Where a member of staff, student or apprentice learner has been convicted of a criminal offence or accepts a Police caution in relation to behaviour that falls within the scope of the Code of Conduct, the conviction/caution will be taken as conclusive evidence that the behaviour took place and no further investigation shall be required by the University.

In such instances the case will be referred by the LSMHO to either the Director of Human Resources, for a member of staff or the Head of Conduct and Appeals, for a student or apprentice learner for due consideration under the relevant policy or procedure.

# **Support**

The principle aim of the Sexual Misconduct and Harassment Framework is to ensure that support

is provided to those members of our community affected by the issues.

The University will provide information on support, resources available and offer interim measures as appropriate to the Reporting Party, Responding Party, and witnesses involved in alleged incidents of Sexual Misconduct and/or Harassment.

Support resources are available to any member of the University who discloses an incident regardless of their choice to make a Report to the University or Police. Support remains available irrespective of the outcome of an investigation.

The Reporting Party and Responding Party will each have a member of staff assigned to them to offer welfare and pastoral support. This support will be separate; one member of staff will not provide support to both parties.

Staff in these roles will receive training to enable them to support either party during and after an investigation.

The Reporting Party will be signposted to the Sexual Assault Referral Centre if appropriate. The support available through internal and external services is set out at:

- Supporting Victims of Sexual Violence
- Black Country Rape and Sexual Violence Support Centre

## **Monitoring**

The Office of the University Secretary will maintain a central record of incidents to effectively engage in prevention and response initiatives. The Safeguarding Manager will keep a record of anonymised Disclosures and Reports of Sexual Misconduct and/or Harassment incidents involving students and/or staff for trend monitoring purposes. The LSMHO will ensure that the Vice Chancellor's Advisory Group, Corporate Management Board, Student Affairs Committee and Board of Governors are regularly provided with anonymised data concerning the cases that are dealt with under this procedure.

The Safeguarding Manager will manage the administration of the IRM process on behalf of the LSMHO by arranging meetings, taking minutes and keeping records for the process.

#### Framework for a Disclosure

The process below will be initiated following receipt by the University of a Disclosure of an incident of Sexual Misconduct and/or Harassment. The Disclosure may be received in a variety of ways and may not necessarily be brought forward by the Reporting Party.

A Disclosure can be made in one of the following ways:

- to a member of staff
- via the Safeguarding email (<u>safeguarding@wlv.ac.uk</u>)
- if a student or apprentice learner to the Head of Conduct and Appeals

A Disclosure may relate to a Responding Party who is or is not a member of the University community. A Disclosure does not automatically result in a Report under the Sexual Misconduct and Harassment Framework. The University respects the right of the Reporting Party to choose how to take forward a Disclosure.

Following a Disclosure, the Safeguarding Manager in consultation with the Director of Human Resources or the Head of Conduct and Appeals will provide the Reporting Party with their reporting options along with information on resources for specialist support. The University recognises that the Reporting Party may require time and reflection before making a decision. The Reporting Party will be given the option and support to do one or more of the following:

- report to the Police;
- report to the University;
- make no report of the incident; and/or
- receive advice on the support that is available.

Anyone who discloses they have been targeted by someone engaging, or attempting to engage in a sexual act without the Reporting Party's consent or sexually touching the Reporting Party without their consent, will be signposted to the local Sexual Assault Referral Centre (SARC) so that they may access services provided.

This will also allow the Reporting Party to make an anonymous report and have evidence stored while they choose if they want to make a report to the Police. The Reporting Party will be also be signposted to information from the Sexual Assault Referral Centre on how to preserve evidence.

Staff can make a referral to the SARC on behalf of the Reporting Party with their consent.

Students and staff can access the local SARC through the Horizon – Sexual Assault Referral Centre at Wolverhampton:

https://win.wolverhampton.gov.uk/kb5/wolverhampton/directory/service.page?id=AIzfQEQY9w o

Walsall SARC:

https://www.wcld.co.uk/kb5/walsall/asch/service.page?id=J\_oeaLDeFUw

Telford SARC:

https://www.cqc.orq.uk/location/1-877389019/contact

Staff who receive a Disclosure of Sexual Misconduct and/or Harassment should complete the Online Referral Form as appropriate. They may, if the Reporting Party requests, omit the name of the Reporting Party and/or Responding Party.

Staff must ensure that all Disclosures of incidents are passed to the Safeguarding Manager via the Safeguarding email (safeguarding@wlv.ac.uk) as a matter of urgency. The Safeguarding Manager will liaise with LSMHO and the Director of Human Resources or the Head of Conduct and Appeals and arrange an IRM.

The Safeguarding Manager will also retain anonymised information to be used for trend monitoring purposes and staff can seek support and advice regarding the disclosure if needed.

# Framework Procedure following a Report

The Reporting Party may choose to make a Report to the University with the intention of the

University initiating an investigation. Paragraphs 9.6, 9.7, 9.8 are equally applicable to an individual making a Report.

A Report can be made in one of the following ways:

- to a member of staff
- via the Safeguarding email (<u>safeguarding@wlv.ac.uk</u>)
- to the Safeguarding Manager
- if a student or apprentice learner to the Head of Conduct and Appeals

A Report must contain a written statement of the allegation providing details of the Responding Party, setting out the circumstances and details of the alleged behaviour and details of any witnesses.

A Report cannot be investigated if the Reporting Party does not wish the substance of the allegation to be made known to the Responding Party.

Before any action is taken by the University, the Reporting Party will be asked to attend an initial meeting with the Safeguarding Manager during which the procedure for investigations will be explained and the details of the report will be confirmed. If the Reporting Party is unwilling for the Responding Party to be informed of the allegation against them, the investigation cannot proceed.

The Reporting Party will be given the option to participate in an investigation. A note of the initial meeting will be sent to the Reporting Party who will be asked to confirm whether it is an accurate summary of the discussion and confirm whether they agree to participate in an investigation.

Following receipt of a confirmed Report to the University or a report to the Police, the Safeguarding Manager will organise an Initial Review Meeting (IRM) as soon as is practicable.

Pending the IRM, the Safeguarding Manager will advise the reporting manager as to any steps as may be necessary to:

- ensure that if the referral involves a student or apprentice learner that they receive appropriate academic and pastoral support;
- Ensure that if the referral involves a members of staff they are provided with support in the workplace;
- safequard the health, safety and welfare of members of the University community; and
- ensure that confidentiality is maintained as appropriate.

The decision to launch a formal investigation following a Report can only be made:

- at the IRM in consultation with the Director of Human Resources or the Head of Conduct and Appeals; and
- if supported/requested by the Reporting Party.

Staff must not attempt to investigate the incident or inform the Responding Party or any other student of the Report or Disclosure.

If it is found that the Reporting Party has made false or malicious allegations, the Reporting Party may be subject to disciplinary action.

## **Initial Review Meeting**

The Initial Review Meeting (IRM) is the core aspect of the Sexual Misconduct and Harassment Framework which enables the University to ensure that supportive measures are in place for all relevant individuals.

The IRM will be chaired by LSMHO or, in their absence, the DLSMHO and supported by the Safeguarding Manager. The purpose of an IRM is to assess support needs and to consider how to protect the interests of all parties and members of the University community who may be affected by the case and to agree next steps. The Report will not be investigated at the IRM.

The membership of the IRM will depend upon the nature of the alleged incident and will be determined by the LSMHO (or the DLSMHO). The membership may include, as a minimum:

- DLSMHO;
- A representative of Student Support and Wellbeing (or their nominee);
- Director of Human Resources (or their nominee, for staff referrals) and/or
- The Head of Conduct and Appeals (or their nomine, for student or apprentice learner referrals);
- Safeguarding Manager; and
- A senior representative from the School/s of the student/s named in the report;
- A senior representative from the Faculty or Professional Services Directorate of the staff member named in the report.

In addition, consideration will be given to the inclusion of external stakeholders who are actively involved in supporting the student/s affected or who can make a contribution to the purpose of the IRM. This may include, but is not limited to, representatives from a Sexual Assault Referral Centre, the Rape and Sexual Abuse Counselling Centre or the Safeguarding Manager based within the local Police force.

## During the IRM, the members will:

- Consider the academic, work, welfare and support needs of both Parties and of any other
  members of the University community directly involved in the Report and identify any
  actions required to ensure that those needs are met;
- Undertake a risk assessment in order to determine whether any precautionary measures need to be put in place in order to:
  - Ensure that a full and proper investigation can be carried out (either by the police or University) and/or
  - o Implement measures to reasonably ensure the safety and wellbeing of those involved during an investigation carried out by the Police or University.
- Precautionary measures may include:
  - Imposing conditions on the Responding Party and/or Reporting Party (for example, requiring the either Party not to contact certain witnesses or requiring either Party to move accommodation or prohibiting either Party from going to certain places within the University at certain times of the day);
  - Suspending the Responding Party in accordance with the applicable policy and procedure.
  - Identify the members of staff within the University with responsibility for supporting the Reporting Party and Responding Party and, where appropriate, inform them of the outcome of the IRM;
  - o Ensure that arrangements are in place to maintain confidentiality as

- appropriate;
- Review the involvement of external agencies (e.g. Sexual Assault Referral Centre and the Police);
- Decide/make recommendations about what the next steps should be and determine how to carry forward the decisions and/or recommendations that are made;
- o Consider any other actions relevant to the alleged incident.

Actions arising out of the IRM may include (but are not limited to):

- The provision of further or different support to the parties involved. The support measures may relate to academic, work, housing, finance, health and wellbeing matters.
- The imposition of precautionary measures on either Party pending the outcome of the criminal and/or disciplinary process;
- A recommendation to the Offices of the Vice Chancellor that a suspension be imposed
  on the Responding Party under the applicable policy and procedure pending the
  outcome of criminal investigations/proceedings and/or internal
  investigations/disciplinary proceedings.
- A recommendation to the Director of Human Resources or Head of Conduct and Appeals that the alleged incident be investigated;
- Appropriate communication with the parties involved;
- Collection of further information necessary to inform future management of the situation:
- A recommendation that an investigation into an alleged incident that has already commenced under paragraph 8, should be suspended or terminated.
- Informing the Responding Party of the Report and the procedure for investigations and providing them with the option to participate in an investigation.

For members of staff Human Resources are responsible for ensuring that any decision or recommendations made at the IRM are implemented and undertaken in accordance with policy and procedure.

For students and apprentice learners the Conduct and Appeals Unit are responsible for ensuring that any decisions or recommendations made at the IRM are implemented and undertaken in accordance with policy and procedure.

The risk assessment and any precautionary measures that are put in place will be reviewed monthly to assess the continued necessity and impact of the measures and will be amended as appropriate. Additional IRM meetings may be convened by the LSMHO as they believe necessary.

Where the IRM, on the recommendation of the Director of Human Resources or the Head of Conduct and Appeals, determines that an alleged incident should not be considered under this procedure, the respective departments shall provide the Reporting Party with written reasons for the determination and information about their right to request a review.

# Investigating a report under this procedure

Where the IRM, on the recommendation of the Director of Resources or the Head of Conduct and Appeals, agrees that a Report should be investigated, an investigation will be undertaken as quickly as possible. All Parties involved will be expected to maintain appropriate levels of confidentiality.

The investigation will be undertaken in accordance with the applicable policy and procedure.

An Investigator will be appointed and the Investigator/s will act promptly and tactfully, observing appropriate levels of confidentiality at all times. The Investigator/s will take appropriate measures to provide a safe, comfortable and supportive environment in which to discuss the Report with the Reporting Party, Responding Party and any witnesses during investigation meetings. The Investigator/s may consult external parties to seek specialist advice as required while maintaining confidentiality.

The purpose of the investigation meeting is to provide each party with a full and fair opportunity to explain or present their version of events. Investigation meetings will be conducted with sensitivity.

#### **Outcome**

At the conclusion of the investigation, the Reporting Party and the Responding Party will be asked whether they wish the outcome to be conveyed in person, or by email, video meeting or telephone meeting. In all cases a written outcome will be provided.

The Investigator/s will provide an investigation report explaining their written decision summarising their findings and considerations which led them to reach their decision and outlining any recommendations or next steps required.

At the conclusion the University will only provide information in accordance with the requirements of the Data Protection Act and the Reporting Party and Responding Party will be provided with sufficient information to provide assurance that a full and detailed investigation has been undertaken.

### **Request for a Review**

In the event an IRM, on recommendation of the Director of Human Resources or the Head of Conduct and Appeals, concludes that the Report does not meet the threshold for investigation by the University, the Reporting Party may request a review of that decision, in writing to the Deputy Vice Chancellor, within 20 working days of notification of the decision.

A request for a review can be made on the following ground only and should include any supporting evidence:

• New evidence that the IRM were not privy to and therefore could not have taken into account when reaching their determination.

#### **Victimisation**

The University recognises that it takes courage to make a complaint and the University undertakes to treat complaints seriously and sympathetically and to act promptly.

The University undertakes to make every effort to ensure that members of staff, students or apprentice learners who make a complaint of Sexual Misconduct and/or Harassment will not subsequently be subject to victimisation.

Any complaint from a member of staff about such behavior should be brought directly to the attention of the Human Resources Business Partner with responsibility for the Faculty or Directorate.

Any complaint from a student about such victimisation should be brought directly to the attention of the Head of the Conduct and Appeals Unit.

The University also has a Whistleblowing Policy and a referral can be made to the University Secretary via:

## Transparency@wlv.ac.uk

### **Amendments**

This Framework has been approved by the University's Corporate Management Board. The University may change this Framework at any time, and where appropriate. Where the Framework is not due for review, but is found to require updating, it will remain published, unless the reasons for review render it obsolete.

## **Exceptions**

The University is committed to providing a safe environment for students, staff and visitors and adopts a zero-tolerance approach to incidents of sexual misconduct and/or harassment. There are no exceptions.

#### Information and resources

- Head of Conduct and Appeals Unit Ros Hampton
   The University of Wolverhampton, Wulfruna Street, Wolverhampton WV1 1LY Email: R.Hampton@wlv.ac.uk
- Director of Human Resources Tracey Hulme
   The University of Wolverhampton, Wulfruna Street, Wolverhampton, WV1 1LY Email: T.Hulme@wlv.ac.uk
- Lead Sexual Misconduct and Harassment Officer Samantha Waters
   The University of Wolverhampton, Wulfruna Street, Wolverhampton WV1 1LY Email: samantha.waters@wlv.ac.uk
- Policy Manager Eran Sandhu
   The University of Wolverhampton, Wulfruna Street, Wolverhampton WV1 1LY Email: Eran.Sandhu@wlv.ac.uk
- Head of Information and Compliance Louisa Volante
   The University of Wolverhampton, Wulfruna Street, Wolverhampton WV1 1LY Email: Louisa.Volante@wlv.ac.uk

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