



Keble College

Policies and Codes of Practice

2023-24

Includes

Equal Opportunities Policy Statement
Freedom of Speech: Policy Statement and Code of Practice
Harassment: Policy and Procedure
Student Complaints Procedure
Confidentiality and the Circulation of Welfare Information: Guidance
Safeguarding Policy
Transgender and Gender Identity Policy
Drugs Policy
Smoking Policy
Data Protection Policy
IT Acceptable Use for Students
JCR and MCR Code of Practice

Equal Opportunities Policy Statement

The aim

Keble College was established in 1870 to extend access to Oxford University more widely and the College has a continuing commitment to inclusiveness, no matter what a person's age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex or sexual orientation. We aim to ensure that we not only observe the relevant legislation but also do whatever is necessary to provide genuine equality of opportunity. We are committed to a programme of action to make this policy fully effective. The College welcomes diversity amongst its fellows, students, staff members and visitors, recognising the particular contributions to the achievement of its educational purposes that can be made by individuals from a wide range of backgrounds and experiences.

The Commitment - Equality and Diversity Policies

Whether we are staff or students, we all have a role to play in promoting diversity and making Keble College a place where:

- people's differences are respected and catered for, and
- they have equal chances of receiving the provisions they need.

This section sets out a range of policies relating to the six equality strands of sex, race, disability, age, religion or belief and sexual orientation.

Our policies are underpinned by legislation for the six main strands of equality legislation, namely: sex, race, disability, age, religion or belief and sexual orientation. The relevant legislation is:

- Equal Pay Act (1970)
- The Equality Act (2010)

This College's equal opportunity policy is that in the recruitment, selection, education and assessment of students and in the recruitment, selection, training, appraisal, development and promotion of staff, the only consideration must be that the individual best meets, or is likely to meet the requirements of the programme or course or post.

Keble College is committed to provide a learning, working and social environment in which the rights and dignity of all its members are respected, and which is free from prejudice, intimidation and all forms of harassment including bullying. We seek to ensure that no one suffers, either directly or indirectly as a result of discrimination.

In order to realise these commitments, the College will:

- promote the aims of this Policy;
- be proactive in eliminating discrimination, including harassment and bullying, through training and publication of detailed guidance, available to all staff and students;
- have regard to its obligations under relevant legislation, including the requirement to carry out impact assessments in certain areas, and for its policies and guidance to mirror the same and be changed to meet the demands of new legislation;
- regularly review the terms of this Policy and all associated codes of practice and guidance.

Student Body

In relation to students the College aims to provide education of excellent quality for all its students, whatever their background. In pursuit of this aim, the College is committed to using its best endeavours to ensure that all of its activities are governed by principles of equality of opportunity, and that all students are helped to achieve their full academic potential. This statement applies to recruitment and admissions, teaching and assessment, to welfare and support services, as far as the College takes the lead in these matters and when it does not it will act in its support capacity to its best endeavour.

Employment Recruitment and Selection

We aim, through appropriate training and supervision to ensure that all staff who are responsible for recruitment and selection are familiar with this policy and apply it in conjunction with our recruitment policy.

Selection criteria (job description and person specification) will be kept under constant review to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job. Selection will be conducted on an objective basis and will focus only on the applicants' suitability for the job and their ability to fulfil the job requirements. Our interest is in the skills, abilities, qualifications, aptitude and the potential of individuals to do their jobs.

Reasons for the selection and rejection of applicants for vacancies are recorded.

Vacancy Advertising

Wherever possible, vacancies will be notified to job centres, careers offices and local media etc but will always be advertised at least internally. All advertisements will state 'Keble College is an equal opportunities employer'.

Personnel Records

To improve data collected relating to our existing staff, during Hilary Term 2012, questionnaires will be issued to current staff, requesting data on all their protected characteristics except pregnancy and maternity which are already known and recorded separately. The data is to ensure the effective operation of our Equality Policy and for no other purpose.

Training and Development

All non-academic staff are encouraged to discuss their career prospects and training needs with their manager at least annually. Opportunities for promotion and training are communicated and made available to all staff on a fair and equal basis.

Progression within employment will be determined only by personal merit and the application of criteria which are related to the duties of each particular post.

Terms and Conditions of Employment

We will ensure that all of our employment policies, including compensation and benefits, and any other relevant procedures associated with terms and conditions of employment, are formulated and applied without regard to age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex or sexual orientation or any other characteristic unrelated to the performance of the job. These will be reviewed regularly to ensure there is no discrimination. Length of service as a qualifying criterion for benefits will not exceed five years, unless clearly justifiable.

Communication of this Policy

All staff members and students will be made aware of this policy and a copy of the policy will be included in the Employee Handbook, Student Handbook and on the College website and given to all students and staff on joining us.

Implementation, Monitoring and Review

This policy is effective from January 2012.

The HR Manager has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis and may be changed from time to time.

Any queries or comments about this policy should be addressed to the HR Manager for non-academic staff and the Senior Tutor for academic staff and students.

Responsibility

Governing Body and its Committees

The overall responsibility for implementing and monitoring the effectiveness of this policy rests with the Governing Body to which the College Officers and the Equality Committee report.

Human Resources and Equality Committee

On an annual basis, representatives from the student body and staff attend the Human Resources and Equality Committee. This committee engages and consults with students and staff of different ages, gender, ethnicity and disability. The Committee takes positive action to improve practices and services for all and continually monitors these to determine their impact on all groups within the College's community.

Human Resources Manager

The HR Manager is responsible for the day-to-day operation and monitoring of the College's equal opportunities policy and for ensuring compliance with the relevant statutory framework. The HR Manager reports directly to the Warden and the Governing Body and reports job application monitoring statistics annually to the Human Resources and Equality Committee. The HR Manager is assisted in this role by the Assistant Equality Officer.

Similarly, the Senior Tutor is responsible for the application of the College's Equal Opportunities Policy for Keble students and academic staff. The Senior Tutor is the Disability Lead and takes a lead role in disability-related matters. The Senior Tutor reports annually to the Academic Committee and Governing Body concerning student admissions and progress.

Student Support Officer

The Student Support Officer co-ordinates support for disabled students between the College, Departments and the University Disability Office and also ensures that all relevant staff in College are aware of any special needs. This starts with the admissions process but potential students are also welcome to come and discuss their requirements before they formally apply for a place.

Departments

Departmental managers within the College are also responsible for the day-to-day implementation and delivery of this policy. The College will provide relevant training for all staff on their responsibilities and duties under this policy.

All staff and students

We expect everyone who works and studies with us to be treated and to treat others with respect. All members of the College have an individual responsibility to ensure they comply with this policy.

Every student has responsibility for:

- Becoming familiar with the College's policy regarding racism and harassment.
- Being prepared to identify and challenge racial bias and stereotyping. Students should have confidence that the University and College's procedures will support them in such challenges.

Each member of staff has responsibilities for

- Becoming familiar with the College's policy regarding racism and harassment.
- Attending appropriate training and events as required by the College.
- Taking steps to ensure they do not discriminate on racial grounds

Complaints

Keble College takes seriously any breach of this Policy. The College encourages any current student or member of staff who has a complaint concerning a breach of this Policy to bring such a complaint to the College using the staff grievance procedure outlined in the Staff Handbook, the student complaints procedure outlined in the *Policies and Codes of Practice*, or where appropriate, the *College Code of Practice on Harassment*.

College members or employees who believe they are subjected to discrimination should be able to seek advice and support in confidence. In the case of staff, the HR manager or the Welfare Officer are available for these purposes. College members may refer to the Senior Tutor or Harassment Officers.

Allegations regarding potential breach of this policy will be treated in confidence and investigated in accordance with detailed procedures. Individuals who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach in this policy which are found to have been made in bad faith will, however, be dealt with under the appropriate disciplinary procedures.

All individuals will be personally accountable for their behaviour, actions and/lack of actions, in cases of complaint of harassment.

Dealing with discrimination, harassment and victimisation

If managers see unacceptable behaviour, whether or not a complaint has been made, they need to treat the matter seriously and take action to eliminate the behaviour. This may involve pointing out to a colleague the effect their behaviour has on others and getting them to stop. If this approach fails, in more serious cases or if the person who is subject to the behaviour prefers, it will be necessary to take formal action within the normal disciplinary procedures or separate harassment policy.

If an employee considers that they have been treated unfairly due to their age they should raise the issue with their line manager in the first instance. If this approach does not rectify the matter or if the employee prefers, the grievance procedure should be followed.

Direct discrimination occurs where, on grounds of their age, someone is treated less favourably than another person is or would be treated. Unlike other forms of direct discrimination, direct age discrimination will not be unlawful if it is objectively justified. Direct age discrimination will be justified if the employer can show that the treatment is justified as being a proportionate means of achieving a legitimate aim.

Indirect discrimination occurs where A applies to B a provision, criterion or practice that A applies or would apply equally to persons not of the same age group as B, but:

- that puts or would put persons of the same age group as B at a particular disadvantage when compared with other persons;
- that puts B at that disadvantage; and

- that A cannot show to be a proportionate means of achieving a legitimate aim.

Harassment is unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for a person including their perception of the issue. Inappropriate or offensive language or behaviour to staff, students or visitors will not be tolerated.

Victimisation is where a person is treated detrimentally because they have made a complaint or intend to make a complaint about discrimination or harassment or have given evidence or intend to give evidence relating to a complaint about discrimination or harassment.

Further Information

These policies need to be updated regularly. You can help by telling us what new things we may need to include and how they can be improved. We are always interested in good practice. If you can help us, please let us know.

If you would like this document in other formats such as large print, audio CD or in another language please contact marie.ruffle@keble.ox.ac.uk

January 2012

Policy Statement and Code of Practice on Freedom of Speech

Contents

Preamble

Policy Statement on Freedom of Speech

Code of Practice on Freedom of Speech

Meetings and events on College premises

(a) Meetings and events to which this Code applies

(b) Organisation of such meetings or events

(c) Conduct at such meetings or events

College premises made available for use by outside organisations

Other legal requirements

Applications of the Code

ANNEXE

Preamble

Free speech is the lifeblood of a university. It enables the pursuit of knowledge. It helps us approach truth. It allows students, teachers and researchers to become better acquainted with the variety of beliefs, theories and opinions in the world. Recognising the vital importance of free expression for the life of the mind, a university may make rules concerning the conduct of debate but should never prevent speech that is lawful.

Inevitably, this will mean that members of the College are confronted with views that some find unsettling, extreme or offensive. The College must therefore foster freedom of expression within a framework of robust civility. Not all theories deserve equal respect. A university values expertise and intellectual achievement as well as openness. But, within the bounds set by law, all voices or views which any member of our community considers relevant should be given the chance of a hearing. Wherever possible, they should also be exposed to evidence, questioning and argument. As an integral part of this commitment to freedom of expression, we will take steps to ensure that all such exchanges happen peacefully. With appropriate regulation of the time, place and manner of events, neither speakers nor listeners should have any reasonable grounds to feel intimidated or censored.

It is this understanding of the central importance and specific roles of free speech in a university that underlies the detailed procedures of the College, laid out below.

1 Policy Statement on Freedom of Speech

1.1 Members, students, and employees of the College must conduct themselves so as to ensure that freedom of speech within the law is secured for members, students, and employees of the College and for visiting speakers. The College believes that a culture of free, open and robust discussion can be achieved only if all concerned avoid needlessly offensive or provocative action and language. The freedom protected by this Code of Practice is confined to the exercise of freedom of speech within the law.

1.2 Whilst there is no legal prohibition on offending others, the College expects speakers and those taking part in meetings or protest activities to respect its values, to be sensitive to the diversity of its community and to show respect to all sections of that community. An event which is likely to give rise to an environment in which people will experience, or could reasonably fear, harassment, intimidation, verbal abuse or violence, particularly because of their ethnicity, race, nationality, religion or belief, sexual orientation, gender, disability or age, is also likely to be unlawful.

1.3 Under section 43 of the Education (No 2) Act 1986 universities are required to issue a Code of Practice. The following Code was approved by Council on 13 July 2009 and took effect on 1 October 2009.

1.4 Advice on any aspect of this Policy Statement and the Code of Practice may be obtained from the Dean.

2 Code of Practice on Freedom of Speech

Code of Practice issued under section 43 of the Education (No 2) Act 1986:

2.1 Section 43 of the Education (No 2) Act 1986 requires the College to issue and keep up to date a code of practice to be followed by members, students, and employees of the College for the organisation of meetings and other events, which are to be held on College premises, and for the conduct required of members, students, and employees of the College in connection with meetings and other events.

2.2 This Code applies to all members, students, and employees of the College, in respect of all College premises. Outdoor as well as indoor meetings and other events on College premises are included.

2.3. An intentional or reckless breach of this Code of Practice is an offence and may be the subject of disciplinary action. Where the acts of individuals involve alleged breaches of criminal law, the College will assist the prosecuting authorities in implementing the due process of law and any internal disciplinary proceedings may be deferred or suspended pending the outcome of criminal proceedings.

3. Meetings and events on College premises

Meetings and events to which this Code applies

3.1. In this part of the Code reference to a meeting or an event refers to meetings or other events where the nature of the meeting or event, the identity of the speaker or speakers or some other factor gives rise to reasonable concern on the part of the organisers, the Dean or other individuals that the proposed meeting or event may be disrupted or may result in violence, disorder, harassment or any other unlawful activity.

3.2 The Dean is responsible for approving suitable arrangements for such meetings and events and may make such directions, or issue such guidance, as is necessary to ensure that the nature and conduct of the meeting is lawful and in accordance with the provisions of this Code.

Organisation of such meetings or events

3.3. It shall be the duty of the organisers of every such meeting or event to seek the approval of the Dean for the holding of that meeting.

3.4. Any other member of the College or member of staff who has concerns about a prospective meeting or event should bring his or her concerns promptly to the attention of the Dean and the Dean shall take such reasonable steps as are warranted under paragraph 3.2 above.

3.5. Organisers should supply details of the date, time and place of the meeting, the names, addresses, and Colleges (if any) of the organisers, the name of the organisation making the arrangements, and the name of any expected speaker, whether or not a member of the College. Information is required at least seven working days in advance (although the Dean may, at their discretion, agree to receive information closer to the time of the meeting than this). The Dean may cancel any meeting or event where the required information has not been provided seven working days in advance.

3.6. The organisers of meetings and events should comply with any conditions set by the Dean concerned with the arrangements for the conduct of the meeting. Such conditions may include a requirement that tickets should be issued, that an adequate number of stewards should be provided, that the police should be consulted about the arrangements, and that the time and place of the meeting should be changed. The cost of meeting the requirements, and the responsibility for fulfilling them, rests with the organisers (save for academic meetings or events, where the expense rests with the department, faculty or college concerned).

3.7 The Dean will not seek to curtail or cancel a meeting or event unless in their considered opinion the meeting or event infringes on the legitimate rights and freedoms of others or poses a significant risk to health and safety or there is some other substantial and lawful ground for the curtailment or cancellation. The Dean will consult as necessary with the Warden or in their absence the Sub-Warden and where necessary with the University Marshal and police about forthcoming meetings and events covered by the Code. In any case where serious disruption may be anticipated which may not be effectively addressed by any condition specified under paragraph 3.6 above, the Dean

shall have power, having taken into consideration any advice received to order or to advise the cancellation, postponement, or relocation of the meeting.

3.8 All decisions will be reached by the Dean following careful consideration of the evidence available to them and will be limited to those actions that are reasonable, proportionate and necessary to prevent crime or disorder, or otherwise protect the legitimate rights and freedoms of others.

3.9 If an organiser is unhappy with the outcome of a decision of the Dean they may write to the Warden setting out clear reasons for unhappiness with the decision and requesting a reconsideration of the decision.

Conduct at such meetings or events

3.10 The organisers and those in attendance at any meeting or event must comply with any reasonable instructions given during the course of a meeting or event by the Dean, by any other College officer or person authorised to act on behalf of the College in the proper discharge of his or her duties, or by police.

3.11 It is the duty of every member, student, and employee of the College not to impede any person entitled to be present from entering or leaving a place where the right to freedom of speech is being or is to be exercised. This duty is subject only to such conditions as may have been specified in accordance with the terms of this Policy or any limitations imposed or directions given by the police or other relevant public authority.

3.12 Nothing in this Code shall be taken to prohibit the exercise of the right to protest by peaceful means; provided always that such protest is conducted lawfully within the general principles and other requirements of this Code, and the provisions of the Statutes and Bylaws of the College.

4. College premises made available for use by outside organisations

4.1 In any case where the College is proposing to grant permission to an outside organisation or group to hold meetings or events on College premises, the outside organisation or group shall be required to act in accordance with this Code of Practice.

5. Other legal requirements

5.1 The College is mindful of its pro-active duties under equality legislation. The right to freedom of speech is constrained by laws protecting others from discrimination, victimisation and harassment, protecting national security and public safety, preventing of disorder or crime, protecting the reputation and rights of others, and preventing the disclosure of information received in confidence. Reference to such legislation and guidance can be found in the Annexe to this bylaw.

6. Applications of the Code

6.1 Any person who is in any doubt about the application of this Code of Practice to any meeting, event or public gathering on College premises is under an obligation to consult the Dean, who will determine whether the provisions of the Code apply.

ANNEXE Relevant legislation and sources of information

Legislation in this area is characterised by three key themes (the current text of the legislation can be found by searching the Office of Public Sector Information website - <http://www.opsi.gov.uk/psi/>):

(i) Protection of the special status of Higher Education Institutions:
Education Act 1986
Education (No. 2) Act 1986
Education Reform Act 1988

(ii) Anti-discrimination legislation and proactive equalities legislation:
Human Rights Act 1998 (incorporating the European Convention on Human Rights)
Employment Equality (Sexual Orientation) Regulations 2003
Employment Equality (Religion or Belief) Regulations 2003
Race Relations Act 1976
Race Relations (Amendment) Act 2000
Sex Discrimination Act 1976
Disability Discrimination Act 1995, as amended Equality Act 2006
Racial and Religious Hatred Act 2006
Equality Act 2010

(iii) Provisions that qualify rights:
Public Order Act 1986
Crime and Disorder Act 1998
Protection from Harassment Act 1997
Criminal Justice Act 2003 and Criminal Justice (Scotland) Act 2003
Counter-Terrorism and Security Act 2015

Helpful guidance is available in the following places:
University of Oxford Integrated Equal Opportunities Policy
University of Oxford Race Equality Policy
University of Oxford Harassment Code of Practice
Universities UK: Promoting good campus relations: dealing with hate crimes and intolerance (at <http://www.ecu.ac.uk/publications/promoting-good-relations/>)

Agreed by Governing Body June 2016

Policy and Procedure on Harassment

Introduction

1. Keble College does not tolerate any form of harassment or victimisation and expects all members of the College community, its visitors and contractors to treat each other with respect, courtesy and consideration.
2. The College is committed to fostering an inclusive culture which promotes equality, values diversity and maintains a working, learning and social environment in which the rights and dignity of all members of the College community are respected.
3. The aims of the College as reflected in this Policy are to:
 - a. Promote a positive environment in which people are treated fairly and with respect;
 - b. Make it clear that harassment is unacceptable and that all members of the College have a role to play in creating an environment free from harassment;
 - c. Provide a framework of support for staff and students who feel they have been subject to harassment; and
 - d. Provide a mechanism by which complaints can wherever possible be addressed in a timely way.
4. Those in positions of authority within the College, such as the Chaplain, Dean, Harassment Advisors, HR Manager and Senior Tutor, have formal responsibilities under this Policy and are expected to familiarise themselves with the Policy and Procedures on appointment. All senior members of the College have a duty to implement this Policy and to make every effort to ensure that harassment and victimisation do not occur in the areas for which they are responsible and that, if they do occur, any concerns are investigated promptly and effectively.
5. All members of the College community have the right to expect professional behaviour from others, and a corresponding responsibility to behave professionally towards others. All members of the College community have a personal responsibility for complying with this Policy and Procedure and must comply with and demonstrate active commitment to this Policy by:
 - a. Treating others with dignity and respect;
 - b. Discouraging any form of harassment by making it clear that such behaviour is unacceptable; and
 - c. Supporting any member of the College who feels they have been subject to harassment, including supporting them to make a formal complaint if appropriate.
6. This Policy and Procedures are designed to deal with harassment which occurs primarily within the environment of one or more colleges. Incidents of harassment that occur outside the college environment and/or solely within the University environment will normally be dealt with under the appropriate University procedure.¹ If there is doubt as to whether the college or University

¹ www.admin.ox.ac.uk/eop/harassmentadvice/policyandprocedure/

procedure applies, you are advised to seek advice from the relevant college officers described in this Procedure, the Director of Student Welfare and Support Services or the University's Harassment Line.

7. This Policy and Procedures should be read alongside other Keble College policies and procedures, including College disciplinary procedures. These can be found at: <http://www.keble.ox.ac.uk/students/college-handbook>.

8. Any member of the College community who feels they have been subject to harassment can also contact the University Harassment Advisory Service, or their local Harassment Advisor, for support. The Service is also available to those against whom an allegation of harassment has been made. Other sources of help and advice can be found at: www.admin.ox.ac.uk/eop/harassmentadvice.shtml

Definitions

9. A person subjects another to **harassment** where they engage in unwanted and unwarranted conduct which has the purpose or effect of:

- violating another person's dignity, or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for another person.²

The recipient does not need to have explicitly stated that the behaviour was unwanted.

10. Freedom of speech and academic freedom³ are protected by law though these rights must be exercised within the law. Vigorous academic debate will not amount to harassment when it is conducted respectfully and without violating the dignity of others or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

11. **Bullying** is a form of harassment and may be characterised as offensive, intimidating, malicious or insulting behaviour, or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

12. The College seeks to protect any member of the College community from **victimisation**, which is a form of misconduct which may itself result in a disciplinary process. The College will regard as victimisation any instance where a person is subjected to detrimental treatment because they have, in good faith:

- a) made an allegation of harassment, or
- b) indicated an intention to make such an allegation, or
- c) assisted or supported another person in bringing forward such an allegation, or
- d) participated in an investigation of a complaint, or
- e) participated in any disciplinary hearing arising from an investigation, or
- f) taken any other steps in connection with this Policy and Procedure, or
- g) is suspected of having done so.

² Statute XI: University Discipline (www.admin.ox.ac.uk/statutes/352-051a.shtml#_Toc28142342)

³ The college Freedom of Speech Policy can be found in this Handbook

Behaviours

13. Harassment may involve repeated forms of unwanted and unwarranted behaviour, but a one-off incident can also amount to harassment.

14. The intentions of the alleged harasser are not always determinative of whether harassment has taken place. The perception of the complainant and the extent to which that perception is in all the circumstances reasonable will also be relevant.

15. Being under the influence of alcohol, drugs or otherwise intoxicated is not an excuse for harassment.

16. Harassment can take a variety of forms:

- a) Through individual behaviour
 - face to face, either verbally or physically
 - through other forms of communication, including but not limited to, written communications and communications via any form of electronic media or mobile communications device: such behaviour may also amount to a breach of the college's regulations relating to the use of Information Technology Facilities ⁴
 - directly to the person concerned, or to a third party
- b) Through a prevailing workplace or study environment which creates a culture which tolerates harassment or bullying, for example the telling of homophobic or racist jokes.

17. Examples of behaviour which **may** amount to harassment under this Policy include (but are not limited to) the following:

- a) unwanted physical contact, ranging from an invasion of space to an assault, including all forms of sexual harassment, including:
 - inappropriate body language
 - sexually explicit remarks or innuendoes
 - unwanted sexual advances and touching
- b) offensive comments or body language, including insults, jokes or gestures and malicious rumours, open hostility, verbal or physical threats: these include all forms of harassment and abuse on the grounds of disability, race or sexual orientation
- c) insulting, abusive, embarrassing or patronising behaviour or comments
- d) humiliating, intimidating, and/or demeaning criticism
- e) persistently shouting at, insulting, threatening, disparaging or intimidating an individual
- f) constantly criticising an individual without providing constructive support to address any performance concerns
- g) persistently overloading an individual with work that they cannot reasonably be expected to complete
- h) posting offensive comments on electronic media, including using mobile communication devices
- i) threatening to disclose, or disclosing, a person's sexuality or disability to others without their permission

⁴ IT policies can be found at: <http://www.keble.ox.ac.uk/students/college-handbook/part-g-codes-of-practice>

- j) deliberately using the wrong name or pronoun in relation to a transgender person, or persistently referring to their gender identity history
- k) isolation from normal work or study place, conversations, or social events
- l) publishing, circulating or displaying pornographic, racist, homophobic, sexually suggestive or otherwise offensive pictures or other materials.

18. Stalking may also be a form of harassment and may be characterised by any of the following repeated and unwanted behaviours:

- a) Following a person;
- b) Contacting, or attempting to contact, a person by any means;
- c) Publishing any statement or other material –
 - Relating or purporting to relate to a person, or
 - Purporting to originate from a person;
- d) Monitoring the use by a person of the internet, email or any other form of electronic communication;
- e) Loitering in any place (whether public or private);
- f) Interfering with any property in the possession of a person;
- g) Watching or spying on a person including through the use of CCTV or electronic surveillance.

Application of the Policy

19. Harassment is a serious offence. Any member of the College community who feels they have been subject to harassment can make a complaint via the appropriate Procedure: see Annexe A for the Procedure in relation to complaints about staff; and Annexe B for the Procedure in relation to complaints about students.

20. When a criminal offence may have been committed, the relevant harassment Procedure may not be appropriate. These cases will include, but not be limited to, serious assault or threat of serious assault. Student members can seek advice from Harassment Advisors, the Senior Tutor, the Chaplain and/or the Director of Student Welfare and Support Services and/or approach the Police directly; and staff members can seek advice from Harassment Advisors, the HR Manager and/or the Senior Tutor and/or approach the Police directly. Further guidance on dealing with cases of sexual assault or sexual violence is available from the University at [Guidance for staff on handling cases of sexual assault or sexual violence](#).

21. Incidents of harassment that occur outside of the college environment and within the University environment will normally be dealt with under the appropriate University procedure. These procedures can be found at:

www.admin.ox.ac.uk/eop/harassmentadvice/policyandprocedure/

22. If a complainant is deemed to have known or to have reasonably been expected to know that a complaint was unfounded, the allegation of harassment may be judged to be vexatious or malicious, and disciplinary action may be taken against them. No action will be taken if a complaint which proves to be unfounded is judged to have been made in good faith.

23. All parties involved in a complaint (including any witnesses who may be interviewed as part of any investigation, or trade union representatives supporting any of the parties) should maintain the confidentiality of the process. Those involved in advising complainants should, where possible, seek the consent of the individual for the onward disclosure of relevant information to those with a clear need to know. Where such consent is not forthcoming, the person entrusted with the information should make it clear that, in exceptional circumstances, it may be necessary to disclose the information, taking account of the duty of care which may be owed to the individual and/or others.

24. This Policy and Procedure may be found at <http://www.keble.ox.ac.uk/students/college-handbook/part-g-codes-of-practice> or are available in hard copy from the College Office. Copies in alternative formats are available on request.

25. This Policy and Procedure will be subject to regular review by the Human Resources and Equality Committee

Annex A: Complaints of harassment against College staff

1. The Procedure below applies in all cases where the person who is the subject of the complaint is a member of College staff, or who has an association with a particular college, short of an employment contract. The HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) will have oversight of all cases, and will take the lead as appropriate in liaising with other parts of the collegiate University.

2. Where the complainant is a student, support during this process will be provided by the Chaplain and, where relevant, the Director of Student Welfare and Support Services.

3. This complaints Procedure may not be applicable where the allegations are of behaviours that may attract criminal sanction. These cases may include, but are not limited to, cases of serious assault or threat of serious assault. In the first instance such allegations will normally be a matter for police investigation and action. This complaints Procedure therefore focuses on complaints of harassment which can be dealt with within the College environment. However, it also includes the procedure for informing and receiving support from the College in cases where there is police involvement.

Initial action

4. The Procedure below assumes that the individual has not been able first to resolve the issue through an informal approach. If a member of staff wishes to seek informal resolution, they should approach the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) to ask for help in achieving a resolution of the problem. Students should seek support from the Chaplain. At no time should a student or staff member feel obliged to approach an alleged harasser.

5. In some situations, it may be appropriate to ask the parties to consider entering into a mediation or conciliation process. Although mediation or conciliation may be attempted at any time before or after a formal investigation, it may be particularly helpful if it is considered at an early stage before the formal procedure is invoked.

6. In the case of a complaint involving two members of staff, an experienced mediator or conciliator acceptable to both parties will normally be nominated by the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff), who may seek advice from the University's Director of Human Resources if appropriate, for example, in the case of a joint appointment. In the case of a complaint involving a member of staff and a student, the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) will consult the Chaplain, who may seek advice from the Director of Student Welfare and Support Services as appropriate. The mediator or conciliator will meet with the parties separately and as soon as practicable to begin to seek a resolution. The normal expectation is that resolution would be achieved within 20 working days of the initial meetings with the parties (although this time limit may be extended by agreement). Any agreed outcome will normally be recorded in writing.

7. All those involved in the mediation or conciliation process must maintain appropriate confidentiality.

Complaints procedure

8. If informal action does not succeed in resolving the situation, or would not be appropriate given the nature of the complaint, the complainant should make a written complaint. If the complainant is a member of staff, the complaint should be submitted to the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff). If the complainant is a student, the complaint should be submitted to Chaplain who will then communicate it to the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) and/or relevant Head of Department]. A student complainant may also seek support as relevant from the Director of Student Welfare and Support Services. In cases where it is not immediately clear to whom a complaint should be addressed, or if the complainant feels it is not appropriate to approach the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff), or wishes to make a complaint against the HR Manager or the Senior Tutor, advice may be sought from Harassment Advisors and/or Chaplain]. Students and staff can seek support from College Harassment Advisors throughout the complaints process. If the student or staff member does not feel comfortable contacting a College Harassment Advisor, they can contact the Harassment Line for details of another advisor (Tel. 01865 270760 or e-mail harassment.line@admin.ox.ac.uk).

Submission of the complaint

9. In the submission to the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) or Chaplain, the complainant should set out as clearly and succinctly as possible

- a) the nature of the behaviour that they are concerned about;
- b) the effect of this behaviour on them; and
- c) the resolution they are seeking.

The complaint should include dates and details of any witnesses to any incidents referred to in the complaint, together with any documentary evidence. The complainant should also explain what attempts, if any, have been made to resolve the difficulties and the outcome they are seeking.

10. Every effort will be made to achieve a prompt resolution to the complaint – the aim being to conclude the investigation within a period of no more than six weeks. Both the complainant and the person who is the subject of the complaint will be expected to co-operate with the College in achieving that result. In exceptional cases, an investigation may take longer than six weeks, and both parties will be kept updated about the progress of the investigation.

11. Both parties to the complaint have the right to be accompanied and supported by a trade union representative or by a colleague of their choice from within the College at any meeting held under this procedure. If the complaint involves a student they may be accompanied by another student member of the College or a member of the College's welfare team, a senior member of the College, or a member of staff from OUSU's Student Advice Service. These people must maintain appropriate confidentiality.

12. There may be circumstances in which an aggrieved party is not willing, or able, to make a formal complaint but the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) or Chaplain considers that the implications for the aggrieved person or others actually or potentially affected are serious. This may include cases where other parties, but not the aggrieved party, have made a complaint. In this case, the Head of House or other senior member may initiate an investigation and make a decision on further action on the basis of such evidence as is available.

Action by the HR Manager or Senior Tutor on receipt of a complaint

13. On receipt of a complaint, the HR Manager or the Senior Tutor (as appropriate) will, in consultation with the Chaplain in the event of a student complainant, take such steps as they think necessary or appropriate to understand the nature of the complaint and the outcome sought which may include:

- a) informing the person against whom a complaint has been made of the allegations against him or her;
- b) meeting separately with the complainant and the alleged harasser (at which meetings they should be provided with the right to be accompanied);
- c) speaking to other relevant people on a confidential basis; and/or
- d) obtaining further relevant information.

14. The HR Manager or the Senior Tutor (as appropriate) will then decide how to proceed and will inform the parties in writing. They may make such enquiries as are necessary to determine the complaint, or may commission an investigation, where circumstances preclude them from concluding the matter in a timely fashion.

15. The HR Manager or the Senior Tutor (as appropriate) may also determine that immediate interim action is necessary pending the outcome of a formal process.

Investigation

16. The purpose of an investigation is to establish the relevant factual evidence in connection with the allegation(s) made by the complainant.

17. The HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) will appoint an investigator who has had no previous involvement with the case, or with the parties to the case: the investigator may be from another college. The investigation should be concluded as soon as is reasonably practicable. The Investigator will prepare a report and may, if specifically requested to do so by the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff), make recommendations on possible courses of action.

18. The HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) will inform the complainant and the person who is the subject of the complaint in writing (i) of the conclusions they have reached having reviewed the evidence, including any investigation report; (ii) of the action the HR Manager or the Senior Tutor (as appropriate) intends to take; and (iii) of the reasons for any such action.

19. The HR Manager or the Senior Tutor (as appropriate) will also inform any other parties who have been asked to participate in an investigation that the investigation has been concluded.

Investigation procedure

20. The procedure for an investigation will normally be as follows, but may be adapted by the Investigator to meet the needs of the case:-

- a. The investigator will meet the complainant to confirm the details of the complaint.
- b. The complaint as clarified will be forwarded to the person complained against together with any other relevant material that the investigator has.
- c. The investigator will interview, where reasonably practicable, individuals identified by the complainant as having relevant evidence.
- d. The investigator will meet the person complained against to hear their response to the complaint and any further evidence that has come to light.
- e. The investigator will interview, where reasonably practicable, individuals identified by the person complained against as having relevant evidence.
- f. Having considered all the evidence, including any relevant documents, the investigator will prepare a written report of their findings, in relation to which they may check relevant sections in draft with the parties before finalising.
- g. The report will be forwarded to the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff), usually with a copy to the Warden, and, if the complainant is a student, normally to the Chaplain. In cases involving students, consent should be sought from the complainant to inform their department if appropriate. The Chaplain will ensure that appropriate support is available to students following an investigation.

Possible outcomes of a complaint

21. Depending on the nature of the complaint and the evidence found, including the findings of any investigation report, the HR Manager (for non-academic staff) or the Senior Tutor (for

academic staff), in consultation with the sub-Warden and, in the event of a student complainant, the Chaplain, will either:-

- a) Take no further action, other than, where appropriate, implementing or suggesting steps that would help to restore reasonable professional relationships between the parties. This approach will usually be appropriate where the claim(s) of harassment are considered to be unfounded and where there is a continuing relationship between the parties.

or

- b) Initiate resolution of the issues (e.g. by requiring that certain individuals undergo specific training, or implementing practical arrangements to improve professional relationships). If a successful resolution is achieved the case will be closed, but the situation will be monitored for an appropriate period. This approach will usually be appropriate where the evidence does not support a claim of harassment but it is clear that either party has demonstrated behaviours that are likely to lead to further issues between them if unresolved or, alternatively, that there are structural issues within the College that require management attention.

or

- c) Institute disciplinary proceedings where the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) is reasonably satisfied that there is evidence to support allegations of harassment of a sufficiently serious nature that should be further examined through the disciplinary process. In this event, the HR Manager or the Senior Tutor (as appropriate) will determine what intermediate measures are necessary, including any re-allocation of duties, in consultation as appropriate with the relevant department.

or

- d) In rare cases disciplinary action may be instituted against the complainant if HR Manager (for non-academic staff) or the Senior Tutor (for academic staff) is satisfied that the complaint of harassment is unfounded and not made in good faith.

Appeal from the HR Manager (for non-academic staff) or the Senior Tutor (for academic staff)'s decision

22. If either party does not accept the outcome of the complaint (including any judgement that the complaint was vexatious), they may invoke the relevant grievance or complaint procedure within the time scales specified. For staff see the complaints procedure in the College Staff Handbook and for students see complaints procedure in the College Handbook.⁵ If the complainant is a student, a Completion of Procedures letter should be issued.

23. If a student complainant is not satisfied with the outcome following the investigation of the formal written complaint, they may be able to apply to the Office of the Independent Adjudicator for Higher Education (OIA) for a review of the case. They must do so within three months of the date of the Completion of Procedures letter.

⁵ <http://www.keble.ox.ac.uk/students/college-handbook/part-g-codes-of-practice>

Potentially criminal conduct

24. This Procedure may not be applicable where the allegations are of behaviours that may attract criminal sanction. This would include, but not be limited to, cases of serious assault or threat of assault.

Confidentiality

24. Information concerning allegations of harassment must so far as reasonably possible be held in confidence by those to whom it is divulged. Unnecessary disclosure of such allegations may attract disciplinary sanction. Information will be shared on a need-to-know basis, including as appropriate with the individual against whom a complaint is brought. Once a formal complaint is pursued, it is likely to be appropriate and/or necessary for certain information to be provided to others within the College, the University, or to external bodies.

25. Those to whom disclosure may be made outside the University include the police, the Office of the Independent Adjudicator (“OIA”) and the civil and criminal courts. The College will not normally report a matter to the police without the complainant’s agreement, except in those rare circumstances where there is sufficient evidence to suggest that an individual poses an extreme risk.

Records

26. The College and all those involved in this process must comply with the principles of the Data Protection Act 1998.⁶ These include ensuring that personal data is kept accurate and up-to-date, held securely, and not kept for longer than necessary.

27. Those interviewed in the course of any investigation will be asked to review the notes of their individual discussions with the Investigator as soon as is reasonably possible in order to comment on any inaccuracies or omissions.

28. The HR Manager (for non-academic staff) or the Senior Tutor (for academic staff), and if the student is a complainant, the Chaplain, should be consulted about filing and retaining any notes and documents, all of which must be held in confidence.

Annex B: Complaints of harassment against students

1. This Procedure is designed to deal with student complaints of harassment by other students that arise in a College context. Complaints of harassment brought by students against college-only staff will be dealt with under the staff Procedure above, and complaints by students against University staff will be dealt under the University. In all cases a student complainant will be supported by the Senior Tutor and, if appropriate, the Director of Student Welfare and Support

⁶ <http://www.keble.ox.ac.uk/about/governance/Data%20Protection%20Policy.pdf>

Services. If a student is unsure whether a particular instance of harassment falls under the University's procedures or College procedures, they should seek advice from the Senior Tutor, DSWSS or a Harassment Advisor.

2. If a member of College staff wishes to make a complaint of harassment against a student, this will normally be considered as a disciplinary issue. In the first instance, a member of staff should seek support and guidance from the HR Manager, who should consult the Student Welfare Lead and/or DSWSS as relevant.

3. The Senior Tutor and Harassment Advisors can provide support to students, and to staff requiring advice on student cases. The Senior Tutor will have oversight⁷ of all cases referred to them under this Procedure, and will take the lead as appropriate in liaising with other parts of the collegiate University. The Senior Tutor will act as a source of information and advice for the College on student cases of harassment, and will make referrals as appropriate. They will also be responsible for recording and reporting of cases referred to their office under this Procedure.

4. In serious cases, it is likely to be appropriate to proceed directly to stages 2 and 3 of this Procedure.

5. 3. This complaints Procedure may not be applicable where the allegations are of behaviours that may attract criminal sanction. These cases may include, but are not limited to, cases of serious assault or threat of serious assault. In the first instance such allegations will normally be a matter for police investigation and action. This complaints Procedure therefore focuses on complaints of harassment which can be dealt with within the College environment. However, it also includes the procedure for informing and receiving support from the College in cases where there is police involvement.

Stage 1 - Informal action

6. In some cases, a student who feels that they are being harassed by another student may feel able to approach the person in question to explain what conduct they find upsetting, offensive or unacceptable, and to ask that person to refrain from that behaviour. At no time should a student feel obliged to approach an alleged harasser, and the College does not wish to suggest that a student who feels that they have been harassed is responsible for rectifying the situation. It may often be appropriate to proceed directly to stages 2 and 3 of the procedure.

7. Before taking informal action, the student could discuss the situation with a College Harassment Advisor. If the student does not feel comfortable contacting a College Harassment Advisor, they can contact the Harassment Line for details of another advisor (Tel. 01865 270760 or e-mail harassment.line@admin.ox.ac.uk). Harassment Advisors will not approach the alleged harasser on behalf of an individual. Details of the role of the harassment advisor can be found at www.admin.ox.ac.uk/media/global/wwwadminoxacuk/localsites/equalityanddiversity/documents/harassment/role.pdf.

8. Other sources of advice when considering informal resolution include the Chaplain, Dean, Welfare, JCR and MCR welfare representatives, Student Peer Supporters, and OUSU's Student Advice Service (Tel. 01865 288466 or e-mail advice@ousu.org).

⁷ Oversight in this context refers to the Senior Tutor being aware of all cases so as to ensure the provision of appropriate support to students.

9. These sources of support and advice are also available to students who have been accused of harassment.

Stage 2 - Student Welfare and Support Services

10. If informal action does not succeed in resolving the situation, or would not be appropriate given the nature of the behaviour, the Senior Tutor and Harassment Advisors are available for support and advice to any student who feels that they are being harassed. Students can contact the Senior Tutor by e-mail: senior.tutor@keble.ox.ac.uk.

11. The Senior Tutor will refer the student to a staff member trained in dealing with harassment cases, normally a Harassment Advisor. This staff member will be available to support the student throughout the process, including if they decide to move to [stage 3](#) and make a formal complaint, and will also provide support following the outcome of any formal complaint. The Senior Tutor will oversee all cases, and will advise and take action as appropriate. Actions taken will vary depending on the case. Actions taken by the trained staff member may include:

- a) Giving advice on options for ways to proceed, and helping the student to make decisions on the action they want to take
- b) Referring the student to appropriate support services (such as the Student Counselling Service, Harassment Advisors and OUSU Student Advice Service).

Actions taken by the Senior Tutor may include:

- c) Referring a case to the University, if it transpires that the alleged harassment did in fact take place outside of the college environment and within the University environment
- d) Ensuring that relevant members of staff within the collegiate University are informed of the case if appropriate, with the student's consent, and having due regard for obligations of confidentiality owed to others.

12. Support from the Senior Tutor and Harassment Advisors, or those designated by them is also available to students against whom complaints of harassment have been made. Actions taken will vary depending on the case, but the support will be equivalent to that available to a student who feels that they are being harassed by another student, including referral to appropriate support services. The Senior Tutor will ensure that, where a complainant and a student complained against are both seeking support, they will be dealt with by different members of staff, who will maintain appropriate confidentiality.

13. Support from the Senior Tutor and Harassment Advisors is also available to students who wish to make or have made a complaint of harassment against a member of staff, under the [staff Procedure in Annexe A](#).

14. Brief records will be kept of all meetings held and actions taken in relation to the case at this stage. These records will be managed in accordance with the principles of the Data Protection Act 1998.⁸ These include ensuring that personal data is kept accurate and up-to-date, held securely, and not kept for longer than necessary.

⁸ <http://www.keble.ox.ac.uk/about/governance/Data%20Protection%20Policy.pdf>

Stage 3 - Formal written complaint

15. If action taken at stages 1 or 2 does not succeed in resolving the situation, or would not be appropriate given the nature of the complaint, the student should make a formal written complaint to the Dean. In some cases, it will be appropriate to proceed directly to this stage. In these cases, if the complainant has not already been offered appropriate support from a trained member of staff, this will happen.

16. The complaint should normally be made as soon as possible after the event(s) to which it refers, or normally within one month of the completion of any resolution attempts made at stages 1 and 2.

17. The complainant should set out as clearly and succinctly as possible

- a) the nature of the behaviour that they are concerned about;
- b) the effect of this behaviour on them; and
- c) where possible, the resolution they are seeking.

The complaint should include dates and details of any witnesses to any incidents referred to in the complaint, together with any documentary evidence. The complainant should also explain where appropriate any attempts that have been made to resolve the difficulties and, where possible, the outcome they are seeking. If the complainant has already made a statement about the behaviour under stage 2, this may be sent as their formal written complaint, with the proviso that the Dean may request further information.

18. The Dean or another person appointed by them, the Investigator, will investigate the case to establish the relevant factual evidence and decide on any actions which should be taken. This may include:

- a) informing the person against whom a complaint has been made of the allegations against him or her;
- b) meeting separately with the complainant and the alleged harasser;
- c) speaking to other relevant people on a confidential basis; and/or
- d) obtaining further relevant information.

At all times both parties will have the right to be accompanied at meetings by another student member of the College, a member of the College welfare team, a senior member of the College, or a member of staff from OUSU's Student Advice Service.

19. Every effort will be made to achieve a prompt outcome to the complaint – the aim being to conclude the complaint within a period of one month. Both the complainant and the student who is the subject of the complaint will be expected to co-operate with the College in achieving that result. If it is not possible to resolve the issue within this timeframe, for example for reasons of complexity or the absence of relevant parties from Oxford, both parties will be kept informed.

20. At all times both the complainant and the student complained against will be kept informed of proceedings, and will be referred as appropriate to sources of support and advice. Both parties will be informed in writing of the outcome of the investigation of the complaint.

21. In some circumstances, in the interests of the complainant and/or the student complained about, it may be necessary for interim action to be taken, pending the outcome of the

investigation. This may include making arrangements to limit contact between the parties concerned.

22. Investigation of a formal written complaint of harassment may result in:

- Deciding that the alleged harasser should face disciplinary procedures⁹
- Taking actions in College, or recommending to a department/faculty actions to take, including making arrangements to limit contact between the parties concerned. The Warden or head of department will have responsibility for implementing and monitoring any actions. The Senior Tutor and University Director of Student Welfare and Support Services will be available to advise
- Referring either or both parties to appropriate support services
- Referring a case to the University, if it transpires that the alleged harassment did in fact take place outside of the college environment and within the University environment.
- Taking no further action other than, where appropriate, implementing or suggesting steps that would help to restore reasonable relationships between the parties. This approach will usually be appropriate where the claim(s) of harassment are considered to be unfounded and where there is a continuing relationship between the parties
- In rare cases disciplinary action may be instituted against the complainant if there is evidence that the complaint of harassment is unfounded and not made in good faith.

23. If the complainant is not satisfied with the outcome following the investigation of the formal written complaint, they may be able to appeal this decision using College Complaints procedure¹⁰ or, if they have exhausted all mechanisms of appeal within College (including the Conference of Colleges Appeal Tribunal, apply to the Office of the Independent Adjudicator for Higher Education (OIA) for a review of the case. The complainant should seek advice from the Senior Tutor or a Harassment Advisor] if they are considering taking this action. If applying to the OIA they must do so within three months of the date of the Completion of Procedures letter.

24. Following the outcome of the complaint, the Senior Tutor will take such action, including informing others, and arranging for support for all parties following the outcome, as may be appropriate in the circumstances.

25. There may be circumstances in which an aggrieved party is not willing, or able, to make a formal complaint but the Senior Tutor considers that the implications for the aggrieved person or others actually or potentially affected are serious. This may include cases where other parties, but not the aggrieved party, have made a complaint. In this case, the Head of House or other senior member may initiate an investigation and make a decision on further action on the basis of such evidence as is available.

Referrals

26. On occasion, complaints of harassment which should be considered under this Procedure may be made to staff other than the Senior Tutor. In this situation, staff should explain the Procedure, and ask the complainant if they would like the case referred to the Senior Tutor,

⁹ <http://www.keble.ox.ac.uk/students/college-handbook>

¹⁰ <http://www.keble.ox.ac.uk/students/college-handbook/part-g-codes-of-practice>

so that they can receive support from a trained staff member, or submit a formal written complaint.

27. If a student does not wish to seek support and advice, or to make a complaint, under stages 2 or 3 of this Procedure, or if there are queries about the procedure to be followed, staff can contact the Senior Tutor or DSWSS for advice on a confidential basis¹¹.

28. There may be occasions where a student does not wish to seek support and advice or to make a complaint under stages 2 or 3 of this Procedure, but where the Senior Tutor considers that the implications for the individual and/or for others actually or potentially affected are serious. This may include cases where other parties, but not the aggrieved party, have made a complaint. In such circumstances the Senior Tutor may initiate an investigation and make a decision on further action on the basis of such evidence as is available. The individual's consent will normally be sought if disclosure is to be made, and a decision on disclosure would be made at a senior level.

Potentially criminal misconduct

29. This Procedure may not be applicable where the allegations are of behaviours that may attract criminal sanction. This would include, but not be limited to, cases of serious assault or threat of assault. Where the complaint is of potentially serious criminal behaviour by a student, the college should consider whether it would be appropriate for the University to investigate, given the University's access to experienced external investigators. Further guidance on cases of sexual assault and sexual violence, including support available, is available from the University.¹² Issues including but not limited to those around teaching, examinations and accommodation/social activity may need to be considered.

30. Support for any student affected by such an incident may be sought from the Senior Tutor, Harassment Advisors, the Chaplain and the Dean.

31. In addition the Senior Tutor will consider whether it is appropriate to make recommendations to appropriate bodies regarding arrangements that would have the purpose of limiting contact between students for so long as may be considered reasonably necessary.

Confidentiality

32. Information concerning allegations of harassment must so far as reasonably possible be held in confidence by those to whom it is divulged. Unnecessary disclosure of such allegations may attract disciplinary sanction. Information will be shared on a need-to-know basis. Once a formal complaint is pursued, it is likely to be appropriate and/or necessary for certain information to be provided to others within the College, the University, or to external bodies.

33. Those to whom disclosure may be made outside the University include the police, the Office of the Independent Adjudicator ("OIA") and the civil and criminal courts. The College will not normally report a matter to the police without the complainant's agreement, except in those rare

¹¹ Any member of the collegiate University can also contact the Proctors for advice and information on any matter.

¹² <https://www.ox.ac.uk/students/welfare/harassment?wssl=1>

circumstances where there is sufficient evidence to suggest that an individual poses an extreme risk.

Records

34. The College and all those involved in this Procedure must comply with the principles of the Data Protection Act 1998¹³. These include ensuring that personal data is kept accurate and up-to-date, held securely, and not kept for longer than necessary.

35. Those interviewed in the course of any investigation by the investigator will be asked to review the notes of their individual discussions with the investigator as soon as is reasonably possible in order to comment on any inaccuracies or omissions. All notes will be preserved during the process and until such time as the College's internal processes and any external processes are concluded.

36. The Senior Tutor should be consulted about filing and retaining any notes and documents related to this Procedure, all of which must be held in confidence.

Sources of advice

College Harassment Advisors. Any junior member of college who believes they may be suffering from harassment is strongly encouraged, in the first instance, to consult one of the two College Harassment Advisors. The role of a Harassment Advisor is to listen non-judgementally to individuals' concerns and provide them support by:

- advising them on the appropriate Policy and procedures
- guiding them through the College Policy and procedures, clarifying the options open to them and assisting them to resolve the matter informally where possible
- where requested, supporting them through the resolution process, whether formal or informal
- referring them to another advisor where necessary or to other agencies and support systems as appropriate

Harassment Advisors do not:

- approach the alleged harasser in an attempt to mediate or resolve the matter
- act as representative or advocate
- act as a party to any formal stage of the complaint process, except in the role of providing support

Harassment Advisors will deal with all cases with the utmost confidentiality except where there is an unacceptable risk to another individual or to the College.

The current College Harassment Advisors are:

Professor Diane Purkiss (dianepurkiss@btinternet.com) (2)72768
Dr Alfonso Bueno Orovio (alfonso.bueno@cs.ox.ac.uk)

¹³ <http://www.keble.ox.ac.uk/about/governance/Data%20Protection%20Policy.pdf>

The **University Harassment Advisory Service**, comprising a network of around 300 voluntary advisors, is available to staff and students. The central Harassment Line will provide details of an advisor: (2)70760 or harassment.line@admin.ox.ac.uk

Departmental Harassment Advisors, of whom there are at least two for each department

The **Director of Student Welfare and Support Services'** office is available to all students:
director@swss.admin.ox.ac.uk

OUSU Student Advice Service is available to all students. Contact 01865 288466 or advice@ousu.org

Local trade union officials can also be contacted for support by staff. Details may be found at www.admn.ox.ac.uk/personnel/staffinfo/joint.

Guidance on sexual violence

Neither the College nor the University Policies on Harassment may be applicable where allegations are of behaviours that may attract criminal sanction. The University's guidance for staff on handling cases of sexual assault or sexual violence are available at:

<http://www.admin.ox.ac.uk/eop/harassmentadvice/policyandprocedure/guidance/>

Approved by Governing Body on 15 June 2016

Student Complaints Procedure

1. Introduction

1. *Purpose* The purpose of this Student Complaints Procedure is to enable junior members of Keble College to raise matters of concern with College officers, and to enable these matters to be investigated and responded to, with the aim of reaching a resolution satisfactory to all within a reasonable timescale and having due regard to the requirements of natural justice.

2. *Principles* The procedure is designed to follow the core principles of the [Good Practice Framework for Handling Complaints and Academic Appeals](#) produced by the Office of the Independent Adjudicator. These principles require that the procedure is: accessible and clear; fair, independent, and confidential; inclusive; flexible, proportionate, and timely; and they should improve the experience of junior members. The Framework document may be consulted in addition to the Procedure set out below.

3. The College welcomes feedback and takes complaints seriously. Junior members will not suffer any disadvantage as a result of making a complaint in good faith. Disciplinary action may be taken against anyone who victimises or retaliates against a student who brings a complaint in good faith, and against any student who brings frivolous, malicious or vexatious complaints.

4. *Anonymous complaints.* Anonymous complainants will only be considered if there are good reasons for the matter to be investigated. Raising a complaint anonymously might change the way the College is able to investigate and/or limit the ability to provide support or respond to the complaint.

5. *Group complaints* Where an issue concerns a number of junior members, those individuals can submit a group complaint. Under such circumstances the college can ask the group to nominate one junior member to act as a group representative.

6. The majority of cases will normally be settled by the complainant resolving their grievance directly with the relevant tutor, college staff member or departmental manager. Where this is not possible, complainants can seek an early resolution, but a formal procedure is also available where a complainant wishes to register a written grievance.

7. Students are encouraged to raise concerns as soon as possible such that they can be resolved before they grow into a larger problem.

8. *Timing.* The College will try to resolve all complaints made in good faith promptly and will provide an explanation where this is not possible. Throughout the procedure objective and transparent measures will be used where possible and all processes will be exercised with impartiality. All individuals involved in proceedings are bound by the College's published code on Confidentiality.

2. Scope

9. *Matters in the scope of this procedure* The Complaints Procedure outlined below is intended to be followed in cases of dissatisfaction by one or more junior members with regard to domestic, financial and academic matters that affect the quality of an individual's learning opportunities. Examples include, but are not limited to:

- failure by the college to meet obligations including those outlined in the Student-College contract and the College Handbook;
- misleading or incorrect information in prospectuses or other promotional material produce by the College;
- concerns about the delivery of College teaching;
- dissatisfaction with the College's response to a request for a reasonable adjustment on grounds of disability;
- poor quality of facilities, learning resources or services provided directly by the College.

10. *Matters NOT in the scope of this procedure* There are separate procedures for addressing matters, including:

- a) academic appeals. Requests for a review of a decision of an academic body (almost always the University) charged with making decisions on progress, assessment and awards should be referred to Proctors and the relevant University procedures: <https://academic.admin.ox.ac.uk/academic-appeals-0>
- b) University teaching, including behaviour of members of University staff, and University facilities. The University Proctors handle these complaints; details on the procedure are here: <https://academic.admin.ox.ac.uk/files/universitystudentcomplaintsprocedure2020pdf>
- c) complaints or allegations that a member or employee of the College has committed an act of bullying or harassment. These are addressed by the *Policy & Procedure on Harassment* published in the [College Handbook](#).
- d) appeals and complaints relating to Academic Discipline or Non-Academic Misconduct. These are covered by provisions in the respective procedures except where otherwise stated.
- e) complaints about the behaviour of another junior member. These are subject to decanal authority under the procedure for Non-Academic Misconduct found in the [College Handbook](#).
- f) private disputes between students and members of employees of the College.

11. *Common Room representatives*. Complaints about College services and facilities that affect groups of junior members can also be raised with the elected representatives of

the Junior and Middle Common Rooms, who can bring them to the relevant College Committees or directly with College Officers.

12. *Advice.* The Senior Tutor can advise on which procedure may be appropriate.

Who can make a complaint and when?

13. A complaint may be made under this procedure by current students of the College, whether they are students on course or students whose status is suspended for whatever reason, and former students of the College whose complaint relates to a matter that arose while they were a current student or a student with suspended status.

14. The College will not normally consider complaints which are made more than three months after the problem originally arose or, in the case of an emerging problem, more than three months after the actions or events that, according to the junior member, brought the problem to a head. Junior members wishing to bring a complaint beyond this period will be expected to provide a good reason why it could not be brought sooner.

15. *Former students.* Former students are advised that raising a complaint beyond the normal timeframe might change the way the College is able to investigate and/or limit the ability to provide support or respond to the complaint.

16. *Late complaints.* In deciding whether to accept a late complaint the College will consider the student's individual circumstances, the nature and seriousness of the issues they are raising, and whether it is still reasonably possible to investigate the matter

3. Early Resolution

17. Complaints and concerns may be discussed with any tutor or member of staff and the complainant can be accompanied at any stage by a friend or an adviser (e.g. an officer of the JCR or MCR). Tutors who have been contacted by a complainant are required to inform the appropriate departmental manager of the complaint as soon as possible.

18. The relevant departmental managers are as follows:

- a) For issues involving domestic college staff and services e.g., catering and accommodation: the Domestic Bursar.
- b) For academic matters: the Senior Tutor.
- c) For financial matters and complaints about College Maintenance, sportsground and gardens, IT and Library provision: the Bursar.

19. *Procedure.* To address the complaint the relevant departmental manager may ask the student to summarise or clarify the key parts of their concerns in writing if it is unclear but it will not be always necessary to submit a written complaint. The manager will try to find a remedy, or a reconciliation (in cases where relations have broken down between individuals, and the complainant does not object to this course) as soon as practically possible. The manager will also consider whether it is appropriate to refer the student to other sources of advice and support while the complaint is being addressed.

20. If it is necessary to gather extensive evidence to address the complaint it will usually be best to follow the formal procedure (below).

21. *Record keeping.* The departmental manager should keep a written record of the complaint and any actions taken and brief details of what was communicated to the student and when.

22. The Human Resources Manager will provide advice and training for departmental managers involved in dealing with student complaints.

4. Formal Procedure

23. The formal procedure is activated when:

- the complainant has good reason not to want to engage with early resolution
- the complainant is not satisfied with the outcome of early resolution
- the issues raised are complex and require either the gathering of extensive evidence and/or detailed investigation

24. *Written complaint.* All formal complaints must be made in writing to the Warden or, if the complaint is about the Warden, the Sub-Warden (in the text below the term 'Warden' is used for both eventualities). The submission should set out as clearly and succinctly as possible: (i) the nature of the matter being complained about; (ii) the effect on the individual; (iii) any steps taken under early resolution; and (iv) the resolution being sought. The complaint should include dates and times and all other relevant details, together with any documentary evidence available to them. The Warden will send a written confirmation of the receipt of a complaint within two working days of the written complaint being received.

25. *Initial assessment.* The Warden will make an initial assessment of the complaint to check that it is being made under the right procedure, that it has been received in good time, and that it cannot be resolved by early resolution or conciliation and mediation, taking advice as necessary. The decision of whether and how to continue with the complaint will be communicated in writing to the complainant within five working days of the acknowledgement of the receipt of the complaint. If the decision is to continue, then the Warden should also indicate the expected timeframe for investigation and decision.

26. *Early action.* The Warden will consider whether any early action pending resolution of the complaint is required, for example where the issues raised are significantly affecting the student's mental health or where the student is very distressed.

27. *Prompt resolution.* Every effort will be made to achieve a prompt resolution of the complaint. The aim will be to conclude the investigation within a period of no more than six weeks. The complainant will be expected to cooperate with the College in achieving this aim.

28. *Investigator.* The Warden will direct the relevant departmental manager (or, if that person is subject to the complaint, another departmental manager or appropriately qualified individual who has not hitherto been involved in the case) to investigate the complaint, produce a written report, and a recommendation of what action should be taken. The Warden will inform the student of the identity of the investigator.

29. *Purpose and scope of investigation.* The investigator should meet with the complainant, who may be accompanied by a representative of the relevant Common Room or the Student Union, as soon as possible. It is essential to be clear about what exactly is being investigated to make sure that both the departmental manager and the student understand the purpose and scope of the investigation. If the complainant's expectations appear to go beyond what the College can reasonably deliver or what is in its power to deliver, the investigator should explain this to the complainant in writing.

30. *Investigation.* The investigator may make such inquiries as they think fit, and the taking of the complaint to the formal stage implies consent by the complainant to all such inquiries. The investigator will have due regard for confidentiality and the potential sensitivity of any evidence gathered during their inquiry. They should keep a written record of who they have spoken to or met as well as notes of any interviews.

31. *Report and recommendation.* On conclusion of their investigation, the investigator will submit a written report to the Warden, together with any written evidence, and a recommendation of what action should be taken.

32. The investigator may recommend mediation and conciliation which, to be effective, should involve the agreement of the complainant.

33. *Decision.* The Warden will make a decision based on the investigator's recommendation. This, together with the report and any written evidence, will be promptly communicated in writing to the complainant. The Warden should set out the outcome of the formal stage, including any decision to reject the complaint at initial assessment, giving a clear explanation and outlining the reasons for each decision in straightforward language. The decision should also give information about the complainant's right to review and appeal, including the grounds on which they can do so, as well as where and how to access support.

34. *Completion of Procedures.* If the complaint has been rejected, for example because it was too late or not made on permitted grounds, and no further appeal is possible, the Warden should issue a Completion of Procedures letter consistent with the guidelines of the Office for the Independent Adjudicator for Higher Education.

5. Review of formal stage outcome

35. If the complainant is not satisfied with the outcome of the formal stage they can ask for a review. Grounds for a review include, but are not confined to:

- a review of the procedures in the formal stage
- a consideration of whether the outcome was reasonable

- new evidence that could make a difference to the outcome and which the complainant could not reasonably have provided earlier in the process.

36. To seek a review the student must write to the Sub-Warden within ten working days of receipt of the outcome (as above) setting out the grounds for appeal. If the Sub-Warden has previously been involved in the case the request should be sent to a senior College Officer e.g., Senior Tutor, Bursar, or Chaplain.

37. *Initial assessment.* The Sub-Warden will make an initial assessment of the request. If they determine that there is no merit in the appeal and/or that it is late, they will issue a Completion of Procedures letter to the student setting out the grounds for further appeal to the OIA.

38. *Panel.* If the Sub-Warden determines that there should be a review, they will convene a panel to include two other members of Governing Body not previously involved in the case. The panel may follow such procedure as it thinks fit to review the procedure and/or decision and/or consider the new evidence. The panel may: dismiss the appeal; appoint a new investigator and re-run the formal stage; refer the case to reconciliation or mediation; or take such action as it thinks justified, proportionate, and appropriate.

39. The Sub-Warden should set out the outcome of the review, including any decision to reject the request at initial assessment, giving a clear explanation and outlining the reasons for each decision in straightforward language. This communication can be in the form of a Completion of Procedures Letter which, in any case, must be provided in the event the appeal is not upheld.

6. Independent external review (OIA)

40. A student who is dissatisfied with the outcome of internal College proceedings for handling their complaint has the right to have their case reviewed by the Office of the independent Adjudicator for Higher Education (OIA). They should apply to the OIA within 12 months of the issue of a Completion of Procedures Letter. Instructions about how to do this can be found at the OIA's website: <https://www.oiahe.org.uk/>.

41. At the conclusion of proceedings, the student bringing the complaint must be provided with a *Completion of Procedures Letter*. This should be sent by either the Investigator, Warden, or Sub-Warden as appropriate to the stage of proceedings reached and must be within 28 days of the communication of the relevant decision. Guidance (including a template) on how to write a Completion of Procedures Letter can be found at: [Completion of Procedures Letters - OIAHE](#). The Letter should also inform the complainant of their right to appeal to the Office of the Independent Adjudicator for Higher Education and the timeframe for doing so.

7. Monitoring and Other Arrangements

43. In order to ensure compliance with the Race Relations (Amendment) Act 2000 and to promote equal opportunity and diversity, the Human Resources Manager will monitor

student complaints made using the formal procedure in an academic year. These records will indicate how many formal complaints have been registered, and what stage they reached. This data will be maintained in an anonymised format solely for the purposes of ensuring that the College's equal opportunities policies are operating effectively. Ongoing monitoring and regular analysis of such data by the College's Equality and Human Resources Committee will provide the basis for taking any appropriate steps to eliminate unlawful direct and indirect discrimination and to promote equal opportunity and diversity.

This procedure will be subject to review by Governing Body at least every five years.

This procedure will be available in the *College Handbook* and the Senior Tutor will draw students' attention to it on at least an annual basis.

Agreed by Governing Body May 2023

Guidance on Confidentiality and the Circulation of Welfare Information

This document outlines College policy in two related areas: the application of the law relating to the confidentiality of information on the part of welfare advisers; and guidance as to how information about students should be circulated amongst College officers in order to ensure that the College exercises its duty of care.

CONFIDENTIALITY

The College follows the [*University's Guidance on Confidentiality in Student Health and Welfare*](#). This guidance balances confidentiality with a need to act in cases of risk of serious harm. In general, information relating to the health and welfare of an individual will amount to special category data (as defined in the UK General Data Protection Regulation (UK GDPR)) and must be kept confidential and only disclosed with consent. Exceptions to the general rule arise particularly in cases where there is a Risk of Serious Harm. This includes cases where the student lacks capacity to give consent and needs intervention from medical professionals. The Guidance sets out the basis for dealing with exceptions to that general rule.

WELFARE INFORMATION CIRCUIT

Rationale

Information about the welfare of individual students will sometimes be circulated amongst College officers to enable the College to exercise its duty of care towards all its members, and to ensure that students are able to carry out satisfactory academic work.

The circuit consists of an inner core of senior College officers — Warden, Dean and Senior Tutor. College officers and members who come across certain categories of information (see below) about individual students should pass it to one or all of these officers in writing. If e-mail is used for this purpose the message must contain only essential, factual information as the security of e-mail messages, even if they are encrypted, cannot be guaranteed. These officers then share the information amongst themselves and pass it on to any others who need to know.

The rationale for these and other officers' involvement with the information, and the particular functions they exercise on behalf of the College, are as follows:

Warden, Senior Tutor, Deans: responsibility for students' overall welfare.

Senior Tutor: academic implications of welfare problems; dealing with external enquiries about students.

Welfare Fellow/Student Support Officer: advising students on all aspects of welfare and special needs provision

Accommodation Manager: domestic implications of welfare problems and absence from accommodation.

Tutor/College Adviser: academic implications of welfare problems.

Lodge Porters: involvement of external agencies on College site; security issues; absence of students.

Students, especially those living out, have a responsibility to inform the College of changes in their circumstances likely to have a substantial effect on their ability to work and/or welfare.

Discretion

Officers will use discretion in circulating information, disclosing only the minimum that needs to be known, to those who need to know. (For instance, in explaining that someone has left College for a time, it will often not be necessary to explain why, especially if it involves sensitive personal data.)

While the following offers guidelines to the circumstances in which information should be disclosed to whom, these should not be taken as rigid or automatic routes: in each case, the person who first encounters the information, or the person in the inner core to whom the information is given, should assess who else needs to know and for what reasons.

E-mail must be used with care to ensure that no inadvertent disclosure takes place, for instance by failing to modify circulation lists and collective addresses, or using 'Reply' thoughtlessly.

Guidelines

See table below. As a general rule, the inner core (Warden, Senior Tutor, Dean) should be informed by e-mail of incidents falling into categories (i) and (ii). E-mails should not be used to convey detailed information about a student; they should be used only as an effective means of recording and circulating essential, factual information. As indicated below, other officers such as the nurse, welfare officers and chaplain may also need to be informed, depending on the individual circumstances.

In all cases involving graduates, the Senior Tutor will decide whether to inform the graduate's University Supervisor.

NB: Students with physical or psychological problems should always be encouraged to seek professional medical advice and support.

Guidelines for sharing sensitive information about students

Circumstance	Who needs to know
(i) Medical & psychological	
Emergency overnight admission to hospital	Warden, Senior Tutor, Deans, Subject Tutor/College Adviser, Nurse, Lodge
Emergency treatment in hospital	Warden, Senior Tutor, Deans, Subject Tutor/College Adviser, Nurse
Emergency treatment in college	Warden, Senior Tutor, Deans, Nurse, Lodge
Temporary withdrawal from College on medical grounds.	Warden, Senior Tutor, Dean, Subject Tutor/College Adviser, Nurse, Lodge, Student Administration Manager
Suicide attempts	Warden, Senior Tutor, Deans, Subject Tutor/College Adviser
Physical or psychological conditions affecting a student's ability to work or otherwise function as a member of the community	Senior Tutor, Subject Tutor/College Adviser.
Circumstances affecting family or friends such as bereavement, serious illness which distract a student or cause frequent trips away from college	Senior Tutor, Subject Tutor/College Adviser
(ii) Legal	
Arrest and detention in police custody	Warden, Deans, Senior Tutor, Subject Tutor/College Adviser, Lodge
Arrest without detention	Warden, Deans, Senior Tutor, Subject

	Tutor/College Adviser
Serious criminal charges laid against a student	Warden, Deans, Senior Tutor, Subject Tutor/College Adviser
Student is victim of incident involving police	Warden, Deans, Senior Tutor, Subject Tutor/College Adviser, Lodge (+ Domestic Bursar in case of theft)
(iii) Internal disciplinary Information	
Disciplinary incidents	Normally dealt with by Deans: information is not more widely circulated
Serious or persistent misconduct in College	The Dean will inform the Warden and the Subject Tutor/College Adviser of serious problems, especially those affecting the public life of the College. Disciplinary procedures will be invoked involving others where offences or procedures go beyond the Dean's jurisdiction in accordance with the College disciplinary policy.

Safeguarding Policy

1. Introduction

- 1.1** Keble College is committed to safeguarding and promoting the health, safety and welfare of its Members and visitors. The College recognises that it is likely that children will enter College premises or interact with College Members in a number of circumstances.
- 1.2** This Policy places the welfare of children to be of paramount importance and aims to safeguard their wellbeing, in particular by protecting them from abuse of any kind. This Policy has been produced in response to an increase in the College's provision of outreach activity for schools and should be read in conjunction with the University of Oxford's *Code of Practice on the Protection of Children and Vulnerable Adults* (a link for which is given in section 14)
- 1.3** A copy of this Policy is available on the College website.

2. Scope

- 2.1** For the purposes of this policy, 'child' or 'children' refers to a person or persons under the age of 18 (as defined in the *Children Act 2004*).
- 2.2** For the purposes of this policy, a College Member is anyone at Keble College, working with children whether as a fellow, employee, student or volunteer.
- 2.3** This Policy applies to all activities involving children and to all College Members.
- 2.4** The College recognises that it has a legal duty to safeguard the welfare of children who come onto its premises or come into contact with its Members under the *Children Acts 1989 and 2004*, and the *Health and Safety at Work etc Act 1974*.
- 2.5** Where a College Member occupies a position of trust with regard to children, an improper relationship with a child constitutes an abuse of trust under the *Sexual Offences Act 2003*.
- 2.6** The College also has certain powers, under the *Rehabilitation of Offenders Act 1974*, to enquire as to the criminal records history of Members to assess any risk to children.

3. Preventative Measures

- 3.1** The College's Lead Safeguarding Officer (LSO) is The Welfare Fellow. The College's Designated Safeguarding Officers (DSO) will depend on the specific event but in most cases will be the Outreach Officer and the Admissions Officer. Contact details can be

found in section **14** of this Policy. The LSO and DSOs will have completed a DBS Disclosure and attended training in child safeguarding.

3.2 The Safeguarding Officers are responsible for:

- Implementing and promoting this Policy;
- Ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children;
- Acting as the main contacts within the College for the protection of children;
- Ensuring that appropriate College Members are provided with information, advice and training on the protection of children;
- Establishing and maintaining contacts with the local Children's Social Care Services departments and Police;
- Maintaining confidential records of reported child abuse cases and action taken.

3.3 Where a role may require College Members to have unsupervised contact with, regularly care for, train, supervise or be in sole charge of children, the College will require satisfactory completion of a Disclosure and Barring Service (DBS) check at the appropriate level.

3.4 New College Members will be made aware of this Policy as part of the induction process. All College Members are expected to comply fully with the guidance and procedures set out in this Policy. The College will ensure that Members are fully briefed and/or trained (as appropriate) on the implications of this Policy.

3.5 This Policy is reviewed on an annual basis.

4. Forms of Abuse

4.1 The UK Government guidance, *Working Together to Safeguard Children 2010* (1.331.36), defines four types of child abuse:

4.2 Physical – the physical hurting or injuring of a child.

4.3 Emotional – the persistent emotional maltreatment of a child which results in severe or persistent adverse effects. Emotional abuse is often present in other categories of abuse, although it may occur independently.

4.4 Sexual – the forcing or enticing of a child to take part in sexual activities. The activities may involve physical contact, including assault by penetration or non-penetrative acts. They may also include non-contact activities such as involving children looking at, or in the production of, pornographic material.

4.5 Neglect – the persistent failure to meet a child's basic needs, likely to result in the serious impairment of the child's health or development. Neglect can include failure to provide the following: adequate food, clothing and shelter; protection from

physical and emotional harm or danger; adequate supervision; access to appropriate medical care or treatment.

5. Recognising Abuse

5.1 Child abuse can and does occur both within a child's family and in institutional or community settings. The following may indicate that a child is being or has been abused:

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- An injury for which the child's or adult's explanation appears inconsistent;
- The child describes an abusive act or situation;
- Unexplained changes in behaviour;
- Inappropriate sexual awareness or sexually explicit behaviour;
- The child appears distrustful of adults;
- The child is not allowed to be involved in normal social activities;
- The child becomes increasingly dirty or shabby.

5.2 It is the responsibility of all College Members to act on concerns in order to safeguard the welfare of the child.

6. Dealing with suspicion of abuse/allegations of abuse

6.1 College Members should address any concerns to the LSO or a DSO. If those concerns relate to a DSO, College Members are expected to discuss the matter with the LSO or to contact Oxfordshire Social Services Department directly. If an individual feels that a DSO or LSO has not responded appropriately, then they are encouraged to contact Social Services without delay. Every effort should be made to maintain confidentiality. Suspicions or allegations of abuse must not be discussed with anyone else other than those named in **3.1**.

6.2 It is the Officer's responsibility to act on behalf of the College in dealing with allegations or suspicion of abuse. It is the task of Social Services, not the College, to investigate the matter, under *Section 47* of the *Children Act 1989*. Under no circumstances should a College Member conduct their own investigation into suspicions or allegations of abuse, neither should they question children closely, as to do so may distort any investigation that may be carried out subsequently by the Police or Social Services.

6.3 If a child says something or acts in such a way that abuse is suspected, the person receiving the information should:

- React in a calm but concerned way;
- Tell the child that they are right to share what has happened, and that they are not responsible for what has happened;

- Find an early opportunity to explain that it is likely that the information will need to be shared;
- Take what the child says seriously and allow the child to continue at their own pace;
- Keep questions to an absolute minimum (only clarify what the child is saying) and not ask a question that suggests a particular answer;
- Not interrupt the child when they are recalling significant events;
- Reassure the child that the problem can be dealt with;
- Tell the child what will happen next and with whom the information will be shared;
- Do not promise to keep secrets;
- Make a full record of what is said and done, though this should not result in a delay in reporting the problem.

6.4 The record should include:

- The child's account of what has occurred;
- Any dates, times or places and any other potentially useful information;
- The nature of the allegation or concern;
- A description of any visible physical injury (clothing should not be removed to inspect the child).

6.5 The record may be used later in a criminal trial and it is vital that what the child discloses is recorded as accurately as possible. The record must be drafted in the child's words and should not include the assumptions or opinions of others.

6.6 The problem should be reported **immediately** to the LSO or a DSO who will take the appropriate action. If the concern arises out of normal office hours (evenings and weekends) contact should be made with the Social Services Emergency Duty Team on 0800 833408. Advice can also be sought from the NSPCC 24 hour helpline on 0800 800 5000.

6.7 It is recognised that College Members may need support after receiving a disclosure from a child and appropriate support will be offered by the College.

6.8 All College Members (including those with obligations to particular codes of conduct/professional ethics that may be thought to constrain their actions) are required to report or act on any disclosures or allegations of abuse that involve a College Member and that have taken place at the College or on College business. College Members do not investigate serious allegations of child abuse themselves as serious allegations will be reported to Oxfordshire Social Services and, if necessary, the police.

7. Procedure for dealing with allegations or suspicions about a College Member

7.1 It can be difficult to accept that a colleague may deliberately harm a child. When a concern arises, there are three processes that may need to take place:

- A child protection investigation;
- A criminal investigation;
- Action by the College/University to discipline or remove the Member.

7.2 Any suspicions or allegations should be addressed to the LSO or a DSO, as outlined in **6.1** above, who will inform the Local Area Designated Officer (LADO) at the Oxfordshire Safeguarding Children Board. The advice of the LADO will be followed appropriately.

8. Candidates for in-person admissions interviews

8.1 Candidates for admission to Keble may be invited to stay at the College for a period of days, during the interview selection process. The College recognises that it is likely that most candidates will be under the age of 18.

8.2 The College has established procedures for the interview process, designed to ensure safeguarding of candidates whilst also fulfilling selection requirements, including but not limited to:

- All student volunteers are appropriately trained and given specific information about how to respond to reports of neglect or abuse.
- Any members of the College who may be alone with candidates for significant time (this does not include interviewers or housekeeping staff) are DBS checked.

9. Students under the age of 18

9.1 The College may admit students who commence their studies before their 18th birthday. The College recognises that:

- Anyone under the age of 18, as a matter of law is a child;
- The College has special duties of care towards a child;
- The College is not *in loco parentis*, except in the case of a medical emergency where written permission has been previously obtained from the parent or guardian of the child.

9.2 The Senior Tutor (as LSO) is responsible for ensuring that the College DSOs, the Domestic Bursar, the Dean, Welfare Officer and relevant tutors are informed of the admission of any students under the age of 18.

9.3 The Senior Tutor is responsible for ensuring that the hall, bar and lodge have the names of any students under the age of 18.

9.4 The Senior Tutor is responsible for gaining written agreement from parents and students under the age of 18 that they accept the provisions put in place.

10. Confidentiality

10.1 The College has an obligation to respect the privacy and confidentiality of all individuals. Nevertheless, it is not always appropriate or sensible to promise complete confidentiality to informants in circumstances of alleged abuse. In some circumstances the College owes a duty of care to its students or visitors that cannot be fulfilled unless the College takes action on the basis of information that might have been provided in confidence. Anyone making an allegation of abuse should be assured that:

- (i) The adult will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken.
- (ii) The adult will never tell anyone who does not have a clear 'need to know'.
- (iii) The adult will take whatever steps they can to protect the informing child or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

10.2 There will be circumstances in which it is necessary for a Safeguarding Officer or other College Member to share information with third parties such as the local authority, the police or the child's parents or guardians.

11. Conduct around children

11.1 College Members should remember that inappropriate behaviour can occur via the telephone, internet and email, as well as during direct interaction with children.

11.2 Conduct to be avoided:

- Spending excessive amounts of time alone with children, away from others;
- Taking children to your home;
- Being alone in a vehicle with children.

11.3 Conduct never to be sanctioned:

- Engaging in rough, physical or sexually provocative games;
- Giving children inappropriate drugs or other inappropriate substances, including alcohol (please note that one of the four key objectives of the *Licensing Act 2003* is the 'protection of children from harm' and that it is also an offence for a child to be supplied with or knowingly to consume alcohol on a licensed premises). A child over 16 may be served alcohol if they are eating a table meal together with adults. Members should be aware that the College holds a Premises Licence;
- Allowing or engaging in any form of inappropriate touching;
- Making sexually suggestive comments to children, even in jest;
- Allowing allegations made by a child to go unreported;
- Doing things of an intimate nature for children that they can do for themselves.

11.4 College Members should:

- Treat everyone with fairness, equality and respect;
- Be sensitive to children's appearance, race, culture, religious belief, sexuality, gender or disability;
- Act as a good role model and challenge any unacceptable behaviour from children or from other College Members;
- Report all allegations or suspicions of child abuse using the Procedures outlined in this Policy;
- Consider whether contact with an individual child should involve a colleague's being present;
- Be aware that physical contact with a child may be misinterpreted;
- Retain a professional approach to children, including avoiding physical contact with a child;
- Respect a child's right to privacy and, in residential accommodation, not enter a child's bedroom without prior authorisation except in the case of an emergency.

11.5 The *Sexual Offences Act 2003* provides that intimate contact between an adult and a child, where that adult was in a 'position of trust' to the child is a criminal offence. Those in a 'position of trust' include those who have regular unsupervised contact with a child, or where an adult looks after a child at an educational institution at which the adult is not also receiving education.

11.6 It may be necessary for College Members to take photographs or make videos of children for educational research, teaching purposes, or publication. An image of a child is personal data for the purposes of the *Data Protection Act 2018*. Where images are stored in a way that makes the data subject identifiable, or where the images are used for publication (online and print), written consent should be obtained **before the images are created**. If the data subject is capable of comprehending the implications of consenting to the data use, then their consent should be sought; otherwise, the consent of the parent or legal guardian should be obtained. Whenever an image of a child or vulnerable adult is published, the data subject should, as far as is practicable, be unidentifiable.

12. Risk Assessment

12.1 A risk assessment must be completed by the organisers of any activity specifically intended for children and which brings children onto College premises or into contact with College Members. Once completed, the risk assessment must be approved by a Safeguarding Officer before the activity is undertaken.

12.2 It is expected that for visits by schools where members of staff of that school are in attendance, the school will complete its own risk assessment and take its own child protection steps in accordance with local education authority guidelines.

13. People with Specific Responsibility for Child Protection and their Roles

13.1 The designated staff are responsible for:

- a) Procedure
 - i) Holding and being conversant with current local and national Child Protection procedures.
 - ii) Keeping up to date through training. It is a requirement that this takes place at least every two years.
 - iii) Reviewing and updating the College's Safeguarding and Child Protection Policies and inter agency working. Any deficiencies or weaknesses in the policies and procedures must be remedied without delay.
 - iv) Liaison over safeguarding matters with the local Social Services Department.
- b) Raising Awareness.
- c) Briefing and guiding those in regular contact with children in College on Safeguarding matters. This includes the briefing of new staff as part of their induction.
- d) Keeping close contact with all staff and maintaining awareness of Safeguarding and the need to raise any concerns immediately with the LSO.
- e) Ensuring that the Safeguarding procedures are followed within the College, that each Member has access to the procedures and has an understanding of them.
- f) The Safeguarding procedures must be available to parents and teachers of children working with the College on request.

13.2 Referrals Receiving reports of alleged or suspected child abuse within the College, or reported by a child relating to incidents at home or outside the College, contacting the Social Services Department and taking any other action in response, as set out below:

- Keeping records
- Liaising with the staff
- Liaising with the LSO

13.3 The Governing Body is responsible for undertaking an annual review of:

- The College's Safeguarding policy and procedures.
- The efficiency with which the related duties have been discharged.

13.5 The LSO will undertake training in Safer Recruitment and Child Protection.

13.6 Training In addition to annual update Child Protection briefings to all Members, student helpers are to be trained annually.

14. Contact Information

Lead Safeguarding Officer: Fr Max Kramer, Welfare Fellow (01865 272725)

Designated Safeguarding Officers: Vicky Archibald (01865 272708)
Aimee Rhead, Student Support Officer

University Safeguarding Officers

Dr Markos Koumaditis

Kathy Noren, Interim Director of Student
Welfare and Support Services

see <https://hr.admin.ox.ac.uk/safeguarding-at-risk-adults-and-children#tab-1406376>

The University of Oxford's *Code of Practice on the Protection of Children and Vulnerable Adults* is available here: <https://hr.admin.ox.ac.uk/safeguarding-at-risk-adults-and-children#tab-1406366>

Oxfordshire Children's Social Care

Tel. 0345 050 7666 (Office Hours)

Tel. 0800 833408 (Out of Hours)

Oxfordshire Safeguarding Children Board

Jo Lloyd –Designated Officer (LADO)

LADO.SafeguardingChildren@Oxfordshire.gov.
uk

Tel. 01865 810603

Referral Centre Thames Valley Police

Tel. 01865 335199

NSPCC Helpline

Tel. 0800 800 5000 (24 hours)

Updated by APR May 2023 following annual review by HR and Equality Committee

Policy on Issues of Transgender and Gender Identity

Keble is committed to the [University's Transgender Policy](#) and recognises the associated [Transgender Guidance](#). This policy has three main aims:

- to assist members of the University in understanding gender diversity in relation to the activities of the University;
- to clarify roles and responsibilities for supporting students, staff and alumni who wish to make, or have made changes to their gender identity; and
- to ensure that the University has protocols for changing student, staff and alumni records and for storing confidential information relating to gender identity

Any student wishing to transition, or to discuss their gender identity in confidence, may do so with any member of the College Welfare Team. The first point of contact for a student wanting to transition at College is the Senior Tutor (senior.tutor@keble.ox.ac.uk). Other members of staff, such as the Chaplain, Senior Dean or Welfare and Disabilities Officer can also be approached in the first instance. All conversations regarding this process will be handled sensitively and respectfully, in accord with the College's code of confidentiality.

We acknowledge that some students may have concerns about transition—perhaps regarding the people at home finding out, or about visas if they are an international student—and we can certainly be flexible in coming to arrangements on such issues if they are raised. Students requiring time away from their studies for medical reasons should feel free to mention this to us so that options for deferral and/or suspension can be discussed.

Further information about university-wide policy and welfare provision for students who want to transition is available from:

[The LGBT + Advisory Group](#)
[Advice on gender neutral titles](#)

Updated June 2022

Drugs Policy

Junior Members found using illegal drugs within the College or in College-owned accommodation will be subject to the provisions of the College's disciplinary procedures [as outlined in Section G.5. Junior Members found using illegal drugs in another College or on University premises will be referred to the Proctors, who may refer the case to the Disciplinary Court.

In the case of use of 'soft' drugs such as cannabis, the Senior Dean will normally on the occasion of the first offence, issue formal warnings, together with such conditions (such as drugs counselling) as deemed appropriate to enable the Junior Member to address the problem. A record will be made of such formal warnings. Further offences, or failure to address the problem, are likely to lead to more serious disciplinary action.

In the case of 'hard' drugs (e.g. heroin, amphetamine sulphate, LSD, cocaine, crack), the Senior Dean will as a matter of policy report suspects to the local police, and will consider suspending the student while police and court proceedings take place. Dealing in drugs will be treated severely. Those suspected of dealing in drugs can expect to be referred to the local police. Junior Members should be aware that 'dealing' includes supplying drugs to others irrespective of whether payment is made. Suspension while police and court proceedings take place will be considered.

Should any Junior Member believe that they have a drugs problem of any kind, they are encouraged to contact a College welfare officer, the College nurse or the Chaplain, all of whom may provide confidential advice. The University Counselling Service provides a source of confidential advice outside the College context. OUSU or Student Welfare Officers will assist students in finding appropriate support. The College doctors will also provide medical advice and are bound by the conventions of medical confidentiality. Advice may also be obtained from the National Drugs Helpline (0870776600).

Smoking Policy

The right to work in a smoke-free environment is supported by statutory duties under the Health & Safety at Work Act (1974), Workplace (Health, Safety and Welfare) Regulations 1992 and the Health Act 2006.

This policy seeks to guarantee to non-smokers the right to work in air free of tobacco smoke, whilst also taking account of the needs of those who do smoke. This policy applies to all students and employees, regardless of seniority, and whether their work environment is shared with others. Visitors will also be requested to refrain from smoking in non-smoking areas, as will any other people (e.g. contractors, tourists) working on College premises.

Staff and students meeting visitors from outside the College are required to politely explain our policy and to ensure such people comply with it. Appropriate “no smoking” signs will be displayed prominently in no-smoking areas.

In accordance with the law, all areas of the College including tutors’ rooms, student bedrooms, common rooms, college vehicle and offices are non-smoking.

The College will not permit smoking to take place within 3 metres of any building entrance, being a distance that should ensure that no person is subject to potential harm or discomfort. There is no intention to identify demarcation lines around buildings and staff and students are asked to self-regulate on this issue.

Where smoking is permitted on land owned by Keble College, receptacles will be provided for the disposal of cigarette ends and other waste smoking materials. Staff and students using these areas will also be expected to keep them tidy and to dispose of any rubbish appropriately. Cigarettes, cigars and pipes must be extinguished using the receptacles provided and smokers should ensure that there is no risk of fire.

The prohibition on the smoking of tobacco will be subject to the following exceptions. It will not apply to:

- College grounds and open spaces provided that smokers do not physically obstruct access to or egress from a premise.
- At the Sportsground – but not within 3 metres of the buildings or pavilion.
-

In many workplaces where non-smoking policies have been introduced, employees who smoke do so just outside the entrances and exits to the premises. We believe this would not present the College in an appropriate light and is unpleasant for non-smokers.

Students and staff who need to smoke may do so within the gardens and grounds but only during any recognised rest period or lunch break. Smokers will not be allowed longer or more frequent breaks than their non-smoking colleagues and use of the smoking areas is not to interfere with normal job performance.

Day to day responsibility for implementing this policy lies with managers and the Dean. However, staff and students are expected to take personal responsibility for observing this policy and should feel able to draw this policy to the attention of others, including visitors.

While the College is committed to enforcing its legislative obligations, all are reminded that the Health Act does lay down penalties for those who are in breach of its requirements. Both the College and individual members of staff and students face fines for breaches of the legislation which will ultimately be enforced by Oxford City Council. The maximum fine per offence is £2,500.

Breach of this policy will be dealt with on an individual basis. In the case of students by fines and action by the Dean or in the case of staff, by the invocation of the College's disciplinary process.

Advice for those wanting to give up smoking can be obtained from the College Nurse at pml.keblenurse@nhs.net (during term time) or free Smokefree National Helpline on 0300 123 1044.

This policy has been drawn up following full consultation with staff via the Health & Safety Committee, Staff Forum and ratified by Governing Body in June 2007. Contact details were updated in June 2021.

Action Plan

The College reviews all of its HR policies annually to ensure fairness and that the aims of each policy are being met without adverse impact on any group or individual.

This policy is reviewed by Domestic Committee.

GB07. 110 (7 November 2007) and EC07.26 (31 October 2007)

November 2007
June 2021

Policy on Data Protection

In order to fulfil their educational, pastoral and administrative responsibilities during your studies at Oxford, the College and the University/department will need to collect and process data about you. Data collected by the College may be passed to the University/department and vice versa, so that necessary processing can be undertaken. The General Data Protection Regulations (GDPR 2018) requires that any such information is processed fairly and lawfully, is held securely, and is kept up-to-date.
<https://www.keble.ox.ac.uk/about/governance/data-protection-policies>

In order to satisfy the College's obligations to inform you how your data is processed as well as your rights, the College has published specific privacy notices. These and other relevant GDPR related documents can be found here: <https://www.keble.ox.ac.uk/governance-and-policies/>

The College's Data Protection Officer is the Bursar, who may be consulted if you have any concerns.

IT Acceptable Use Policy for Students

Keble College provides IT and network facilities subject to the terms and conditions stated in this policy. This policy in no way limits the applicability or obscures the intentions of any other policy or legislation that already governs IT and network use at Keble College or the University of Oxford. Any activity that involves Keble College IT facilities must be carried out in accordance to this acceptable use policy. These rules must be read and understood before using any IT facilities at the college, and a signed declaration form must be returned to the College Office before use of any IT facilities is authorised.

1. Definition of Terms

The term IT facilities shall be taken to include: free standing computers; networked computers; shared computers and terminals; services or software; networking that connects computers to any other computers or servers; computer peripherals; computer media; hardware components; networked resources; manuals and documentation.

2. External Conditions of Use

Many IT facilities available at Keble College are provided through contractual agreements with third party organisations, most notably including the network connection to the University of Oxford and to the UK academic network (JANET). Users of these IT facilities must also abide by the terms and conditions of those agreements.

Of particular importance is the JANET Acceptable Use Policy, provided by UKERNA (<http://www.ja.net/documents>). This must be read prior to using any IT facilities at Keble College.

Other requirements specific to IT use currently include:

- a. University Regulations Relating to the use of IT Facilities
- b. Computer Misuse Act (1990)
- c. Data Protection Act (1998)
- d. Oxford University disclaimer of liability
- e. CHEST Code of conduct
- f. Microsoft Campus Agreement
- g. Terms and conditions for other licensed software

3. Authorisation to use IT Facilities

Authorisation to use IT facilities may only be granted by the IT Manager, Bursar or Warden of Keble College.

It is not permitted for authorised users to allow use of IT facilities provided by Keble College by any other person.

4. Acceptable Use

Keble College IT facilities, including the use of the network from personally owned equipment, may under no circumstances be used for conducting business or other commercial activities. The following actions are not considered to be covered by this clause: a. Application for jobs and sending of CVs via email; b. Conducting business transactions as a customer (purchasing items online);

Users of IT facilities provided by Keble College are not permitted to use those facilities for any of the following:

- a. Any unlawful activity;
- b. The creation, transmission, storage or display of any obscene, offensive, indecent or menacing images, data or other material or any data capable of being resolved into such images or material;
- c. The creation or transmission of any material designed or expected to harass another person, or to cause annoyance, inconvenience or needless anxiety;
- d. Access to, creation, transmission or display of extremist material which has the real potential to lead to serious terrorist crime on the part of the user or to draw others into terrorism (contrary to the College and University's statutory duty under Prevent);
- e. The sending of any email which does not correctly identify the sender, or which attempts to disguise either the sender or the computer from which it was sent;
- f. The creation or transmission of defamatory material about any individual or organisation;
- g. The creation or transmission of material that infringes a copyright, trade mark, moral right or other intellectual property right;
- h. The transmission of email to a large number of recipients without proper authorisation, unless those recipients have given consent to receive such email;
- i. The sending or forwarding of email intended to encourage the propagation of copies of itself;
- j. Commercial purposes or conducting business, except to the extent authorised under the user's agreement with the college;
- k. Attempting to gain unauthorised access to any IT facility, system or service within Keble College or outside, or making any attempt to disrupt such a service;
- l. Deliberate or reckless undertaking of any activities which may result in any of the following:
 - Introduction or transmission of a virus into the network or any computer systems or servers;
 - Corruption of data or disruption of the work of others;
 - The waste of network or system resources on systems provided by or accessible through Keble's IT facilities;
 - The waste of staff effort investigating and dealing with any deliberate infraction.

5. Monitoring and Control

Keble College IT facilities are managed and maintained by appointed system administrators who are the IT Manager and IT Officer.

The system administrators reserve the right to monitor the usage of IT facilities, including network traffic, either to investigate an alleged breach of this policy or to identify problems with the IT facilities and infrastructure.

Any records taken or data captured will be retained only for a length of time appropriate to the investigation or fault and will be held securely.

Any data captured will be restricted as far as possible to only examine the particular protocols and sessions needed to minimise the risk of capturing any personal data not relevant to the investigation or fault.

6. Connection of Personal Equipment to the Network

Use of personal equipment connected to the Keble network shall be in accordance with the terms and conditions set out in this policy.

The owner, administrator and users of any equipment connected to the Keble network shall be jointly responsible for taking all reasonable precautions to ensure that the equipment does not disrupt the network or other systems connected to it, or breach this policy. In particular, it is a requirement that:

- a. All available security updates shall be installed in a timely fashion;
- b. Where applicable, a suitable anti-virus product shall at all times be installed, operational and constantly kept up-to-date so as to provide an effective prevention against viruses and malware.
- c. Network accessible services should be disabled or appropriately restricted if they are not critical to the functioning of the equipment on the network or for the purposes it is intended.
- d. In the event that personal equipment connected to the Keble network is detected to be in breach of regulations or an official report of misuse is received, it is a requirement that Keble IT staff be permitted to inspect the equipment to ensure that the reasons for the breach are dealt with correctly and to allow Keble IT staff to certify to any external organisation that action has been taken.

Equipment connected to the network must only use network identifiers allocated by Keble College. These identifiers and the unique identifier belonging to the equipment must not be modified to impersonate another device.

Equipment connected to the college network must not be used to provide access to IT facilities belonging to either Keble College or to the University of Oxford to persons not otherwise authorised to use those facilities.

7. Reporting of Problems

Problems and general enquiries may be directed to the IT Department either by email to it-support@keble.ox.ac.uk or by telephone to 01865 (2)72788.

If reporting a problem outside office hours then messages may be left at the Porters' Lodge.

Any problems or faults with IT facilities should be reported in a timely manner so that the IT department can make arrangements.

Keble College JCR and MCR: Code of Practice

- (i) The JCR is an association open to all undergraduate members of the College. The MCR is a similar association open to all graduate members of the College. Their main objects are to promote the interests and welfare of and social activities among their members and to represent the interests of students to the Governing Body of the College.
- (ii) The JCR and MCR have written constitutions, elect officers and hold regular meetings. Membership of the JCR and MCR is automatically granted to all students who qualify for membership. Anyone who does not wish to take up membership should notify in writing the President of the JCR or MCR (as the case may be) no later than Sunday of 5th week of Michaelmas Term.
- (iii) Membership is free of charge to current members of the College.
- (iv) Withdrawal from membership will disqualify students from standing for office, voting in elections and voting at meetings.
- (v) The written constitutions of the JCR and MCR contain detailed arrangements for the conduct of elections, the conduct of officers, financial management and reporting, the funding of groups and clubs affiliation to external organisations (including OUSU), and the handling of complaints. The implementation of these arrangements is supervised on behalf of the Governing Body of the College by the Bursar (in the case of financial matters) and the Dean (in the case of non-financial matters).
- (vi) The College provides certain social, recreational and welfare facilities for all its Junior Members, including the use of common rooms and the bar. It allows the JCR and MCR as associations to participate in the management and provision of these services and from time to time provides the JCR and MCR with funds to enable them to maintain these services on behalf of the College. The services provided by the College are available to all undergraduate or graduate students (as the case may be) on equal terms whether or not they are members of their respective association.
- (vii) Complaints about the management of the JCR or MCR in question should first be made to the President in question. The complaints procedure to both the JCR and MCR is set out in detail in their respective constitutions.
- (viii) Copies of the constitution of the JCR and MCR are deposited in the Warden's PA's office.
- (ix) The Governing Body of the College reviews the JCR and MCR constitutions every five years.
- (x) The attention of the JCR and MCR is drawn to restrictions imposed on their activities by the law relating to charities. (Information is deposited with the Warden's PA.)