



Sexual Misconduct Procedure

2025/26

This policy applies to undergraduate programmes delivered by Boomsatsuma and validated by Kingston University London.

It should be read in conjunction with the Boomsatsuma's Non-Academic Misconduct Procedure, alongside related validator procedures including the [Kingston University Sexual Misconduct and Policy Procedure](#).

Sexual Misconduct Procedure

1. Scope

- 1.1 The procedure outlines the procedure that Boomsatsuma uses to handle allegations of sexual misconduct made against a student or staff member. It covers reports made by students, members of staff, or third parties.
- 1.2 Allegations made against a student will be handled via the Boomsatsuma Non-Academic Misconduct Procedure. The additional measures outlined below will however also apply.
- 1.3 Allegations about a member of staff, made by any 'Reporting Party', will be handled via the Boomsatsuma Staff Disciplinary Procedure.

2. Definitions

- 2.1 Sexual misconduct is defined by this procedure as unwanted conduct of a sexual nature, which includes but is not limited to:
 - Flirting, gesturing, or making sexual remarks about someone's body, clothing, or appearance
 - Asking questions about someone's sex life
 - Telling sexually offensive jokes
 - Displaying or sharing pornographic or sexual images, or other sexual content
 - Touching someone against their will
 - Sexual assault

3. Support

- 3.1 Support services are available to individuals that have witnessed or experienced incidents or behaviours of a sexual nature. Internal support routes can be accessed by contacting a member of the Student Support team,

or otherwise any member of staff that the Reporting Party feels comfortable approaching (in person or electronically). A selection of external services are also listed on the Student Info Portal and Staff Info Portal, which can be accessed via Google Classroom.

3.2 In the event of an emergency, or where there is an immediate threat of violence or risk to life, call 999.

4. Disclosure

4.1 The Reporting Party can disclose an incident of sexual misconduct, or related concerns, to the Student Support team or otherwise any member of staff. If preferred, they may also contact studenthelp@boomsatsuma.com to disclose an incident via email or otherwise request to meet a member of the Student Support team to begin the disclosure process. In all cases, disclosures will be handled sensitively and the Reporting Party will not be asked to reveal more detail than they want to.

4.2 Staff who receive a disclosure from a student are obliged to inform a member of the Student Support team for safeguarding purposes. All information about The Reporting Party or any reported incident will remain private and used only to ensure they receive support and guidance.

4.3 Disclosures can be for the purposes of seeking support only, and there is no pressure to make a formal complaint. The Reporting Party will choose how they wish to move forward, and Boomsatsuma will support them to do any of the following:

- Report the incident to the Police
- Make a formal complaint, which will be handled via the Non-Academic Misconduct Procedure
- Receive advice on available support
- Take no further action

5. Preliminary Meeting

- 5.1 After making a disclosure, we will invite the Reporting Party to a preliminary meeting. Here we will discuss the disclosure in more detail, provide guidance on available support, and explain what options are available to them moving forward. They can elect to join a meeting in person, or if preferred, via Google Meet, and may be accompanied for support by another student, a friend, or family member. The meeting will be led by a member of Boomsatsuma's Student Support Team or an appropriate nominee.
- 5.2 All details revealed in the preliminary meeting will remain private and used only on a need-to-know basis to progress the case. We will respect confidentiality, however please note that 'confidential' does not mean that all the information provided by the Reporting Party can remain entirely secret. To conduct an investigation, it may also be necessary for us to share essential information with other people at Boomsatsuma or with key staff at our validator Kingston University. We will provide advice on who information will be shared with in advance as far as possible and practicable.

6. Precautionary Measures

- 6.1 Precautionary measures are actions taken by Boomsatsuma to mitigate risks to the person who has disclosed an incident of sexual misconduct, or otherwise other students, members of staff, or third parties. They may include, but are not limited to actions such as suspending members of staff or removing them from certain learning and teaching activities, suspending students from accessing buildings or participating in certain activities, and requiring individuals to cease communicating with others.
- 6.2 Precautionary measures are determined via a risk assessment carried out following the preliminary meeting, and all actions will be reasonable and proportionate.

7. Investigation

- 7.1 Where the preliminary meeting determines that an investigation should take place, we will follow the procedures outlined in Boomsatsuma's Non-Academic Misconduct Procedure. Depending on the severity of the allegation and potential scope of outcomes and penalties, the case may be addressed via an internal 'Stage 1' process or otherwise referred to Kingston University. Please refer to the [Kingston University Sexual Misconduct and Policy Procedure](#).
- 7.2 If an investigation is conducted internally at Boomsatsuma, we will appoint an appropriate Investigating Officer. In some cases, it may also be necessary to engage an external party with specific training in investigating incidents of sexual violence and misconduct. Where this is the case, we will first seek agreement from the Reporting Party.
- 7.3 As part of the investigation, the Reporting Party will be asked to prepare a written statement and provide evidence and supporting documentation as discussed in the preliminary meeting.
- 7.4 The student(s) or staff member in which the allegation is levelled, called the 'Responding Party', will be notified about the allegation in writing and requested to attend a meeting with the Investigating Officer. The Responding Party will also be provided with a redacted copy of the written statement prepared by the Reporting Party, alongside any supporting documentation as required to prepare a response.
- 7.5 During an investigation, all parties that take part in investigatory meetings will be provided with a fair and unbiased opportunity to present their version of events. All parties will meet with the Investigating Officer separately, and notes will be taken in all meetings to provide a record of discussions.

7.6 Witnesses may also be invited to a meeting with the Investigating Officer, or otherwise asked to provide a written statement. Statements may be anonymised on request.

8. Outcomes and Penalties

8.1 Once the investigation has concluded, the Investigating Officer will prepare a report that summarises the case and the process of investigation. On balance of probabilities, they will also make a determination on whether or not disciplinary action should be taken. The Investigating Officer may also provide recommendations regarding ongoing precautionary measures and remedial actions.

8.2 If the Investigating Officer determines that the available evidence does not support an instance of misconduct, the case will be dismissed and no further action will be taken.

8.3 If the Investigating Officer determines that the available evidence does support an instance of misconduct, a panel will be convened to review the case in full and agree what penalties will be applied.

8.4 In all cases, a summary of the outcome and penalties (where applicable) will be provided to both the Reporting Party and Responding Party.

9. Appeals

9.1 Both the Reporting Party and the Responding Party have the right to appeal the outcome of an investigation. Appeals should be made in writing to the Head of Higher Education. An independent panel is convened to review appeals.

10. Police Investigations

- 10.1 In the event that a disclosed sexual misconduct allegation is being reviewed by the Police, Boomsatsuma will hold on commencing an investigation or suspend an ongoing investigation. A decision whether to continue or commence an investigation as part of this procedure will be made following the conclusion of criminal investigations or judicial proceedings.