

Online Harassment, Bullying and Abuse Guidance (Including Prevent related concerns of radicalisation and extremist views)

Please note that this is a “live” document which will change and be amended over time to reflect staff and student input as well as the changing external landscape. The document will go to the School’s EDI committee and Senior Management Team for annual review. Current version June 2021. This document is for guidance only and students and staff should also refer to the relevant agreed policies and procedures on bullying and harassment.

Definitions

The Metropolitan Police define Hate Crime and Hate Incidents as:

“In most crimes it is something the victim has in their possession or control that motivates the offender to commit the crime. With hate crime it is ‘who’ the victim is, or ‘what’ the victim appears to be that motivates the offender to commit the crime.

A hate crime is defined as ‘Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person’s race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender.’

A hate incident is any incident which the victim, or anyone else, thinks is based on someone’s prejudice towards them because of their race, religion, sexual orientation, disability or because they are transgender.

Not all hate incidents will amount to criminal offences, but it is equally important that these are reported and recorded by the police.

Evidence of the hate element is not a requirement. You do not need to personally perceive the incident to be hate related. It would be enough if another person, a witness or even a police officer thought that the incident was hate related.”

The School’s [Maintaining Good Campus Relations in Higher Education Policy](#) states that:

“The School considers that vigorous debate is proper and acceptable in a higher education academic context. Further, it is a long standing tradition that the arts both reflect and challenge the political, religious and social mores of the day. Therefore, staff and students should have freedom, within the law, to voice a wide range of views and opinions on social, economic, political, cultural and religious issues, and to put forward controversial or unpopular opinions. These opinions may be expressed in the form of an artistic output, eg play, concert, opera, installation or other art form.

However, such freedoms do not give immunity from the law nor from personal liability and the School is obliged under law to ensure that any action, publication or speech on its premises is lawful, and to protect its staff, students and visitors from victimisation, harassment or unlawful discrimination.”

Online, these definitions might relate to all material that is the property of the School, as well as inappropriate sharing of comments and material made by staff and students clearly identified as part of the School community.

Introduction

1. The School does not tolerate any form of harassment, abuse, bullying, racism, victimisation or sexual misconduct, and expects all members of the School community, its visitors and contractors to

treat each other with respect, courtesy and consideration. This extends to social media and the online virtual world.

2. Whilst students and staff members can expect to be challenged by each other, and by the concepts and materials that form the teaching in the School, this will be undertaken in a “safe” and respectful environment. Where necessary training will be put in place to ensure each individual member of the community understands their responsibilities and obligations to the wellbeing of the whole community.

Aims

The School understands that any form of abuse (regardless of whether or not it meets the Police definition or threshold for criminal behaviour) can be deeply upsetting and felt keenly by the victim. Conscious of the disturbing impact such events can have on individuals and the wider community, the School’s first priority will be to victims of such abuse; to offer them emotional, psychological and professional support and keep them fully informed of processes and actions being taken. Where there is a need for confidentiality, in order not to undermine an investigation, the School will offer clear explanations for such requirements as well as advice to the victim/s on how best to draw help from their immediate support networks without compromising confidentiality.

The aims of these guidelines are:

- 1) As a *first priority*, to support and protect victims (Section 1):
 - To offer pastoral care, and wellbeing support to victims of online abuse;
 - To respond quickly in order to protect and safeguard victims as well as timely reporting to victims throughout the process;
 - To ensure that offensive material is reported to the relevant platform for removal in a timely manner without undermining or prejudicing any legal action or investigation.
- 2) To identify perpetrators (Section 2):
 - To take all necessary steps to identify perpetrators as soon as reasonably possible; to notify the Police where appropriate, to carry out investigation and any subsequent disciplinary or other processes in a timely manner.
- 3) To work to prevent online abuse (Section 3):
 - To communicate with the School community as and when appropriate;
 - To put in place all appropriate training and practical advice to staff and students about staying safe online and respecting each other in order to help to prevent and deter online abuse.

Practical Application

SECTION 1: What to do if you are a victim of online abuse and/or harassment: Any student or staff member who feels that they have been subject to online harassment or bullying should follow the procedure below:

1.1 Procedure for Staff and Students:

- If you are a student, immediately report the matter to the Secretary and Dean of Students or the Head of Registry; if GYA report to Head of Safeguarding
- If you are a staff member, immediately report the matter to their Head of Department, Vice-Principal or the School's Head of Safeguarding/ Prevent;
- Do not delete the post;
- Take screen shots and save any other relevant evidence;
- Do not engage with or respond to the post;
- Do not click on any links and do not forward globally to others (as per usual safe internet policies);
- Students will be offered wellbeing support. They can speak in confidence to a member of the Student Affairs team or to a member of the Students' Union executive;
- Staff will be offered wellbeing support. They can speak confidentially to the Employee Assistance helpline or access Occupational Health team via the HR department.
- Whilst staff and students who have been the victim of online abuse/harassment will want to use their own support networks, broader discussion in the wider School community is discouraged for the reasons set out in 2.5 below. Throughout the process and once all processes are complete, the School will regularly report back to any victim/s on the actions taken and any formal outcomes where possible (provided this does not compromise any legal or procedural position). It should be noted that some formal processes are confidential and it may not be possible to notify people of specific outcomes. At the conclusion of the process victims will be offered further wellbeing support.

1.2 **Procedure for alumni/ visiting artists/ external contractors:** Where staff become aware of online harassment directed at someone explicitly associated with the School but not a permanent member of the community they should immediately report the matter to their Head of Department or Vice Principal and follow the advice above. Where appropriate, victims in this group will be sent these guidelines and will be allocated a first point of contact within the organisation to help to support them and keep them informed of progress.

1.3 If an incident does occur the Police's advice on matters of online abuse is as follows:

- Once the concern comes to light, all evidence must be preserved (screenshots / save emails / texts etc) immediately. Do not make requests for posts to be taken down / do not delete information.
- Do not click on any links and do not forward globally to others (as per usual safe internet policies)
- Do not engage the person who posted the concern until the incident is reported through to the School's Head of Safeguarding as per timelines on our Safeguarding Policy
- The Head of Safeguarding will then contact the Police, normally on the same day (Prevent team or other departments in the Police if it is another crime), to seek advice.
- Once the School can confirm Police involvement, the School will complete a referral and take further steps as per Police advice
- If the matter is not meeting criminal intervention threshold, nor a referral to Prevent, it will immediately be referred to an internal investigation. In the case of any internal investigation, all reasonable attempts will be made to identify perpetrators and they will be dealt with through the School's disciplinary processes as appropriate.

SECTION 2: What the School will do

- 2.1 In serious cases and where appropriate, the Principal or relevant Vice Principal will reach out to the victim/s with a personal message of support, asking them what help they might need, updating them on what will happen next and advising them on further help and support the School can offer.
- 2.2 The victim/s will be allocated and notified of a first point of contact staff member to support them through the early stages of the process. This will usually be a tutor or Head of Department for students and a line manager or Head of Department for staff/ alumni/ visiting artists.
- 2.3 Where a Head of Department receives reports of online abuse they should immediately inform the Principal or relevant Vice Principal.
- 2.4 The Principal or Vice Principals should ensure the matter has been reported to the School's Prevent Lead (the Head of Safeguarding) as well as the Secretary and Dean of Students and/or Head of HR, as appropriate. The P/VP should also decide whether the incident is of sufficient seriousness to inform the Incident Response Team.
- 2.5 The School will take a view on which other members of the community (if any, and besides those directly affected) may need follow up communications. The timing and content of any such communications will need careful consideration in order not to prejudice any ongoing investigation and ensure confidentiality.
- 2.6 In all actions and communications the School must respond in a timely manner and act as swiftly as is practically possible.
- 2.7 Report the post for removal in a timely manner subject to enquiry. The School will work closely with the Police, where necessary, to establish a timeline to report the post for removal as quickly as possible whilst ensuring any investigation is not jeopardized.
- 2.8 In most cases, the School will be reliant on a third party social media company to remove the post. Note that if the platform fails to respond or disagrees about the legal nature of the post, it is not within the School's power to ensure removal, unless there are other platform criteria that can be invoked, such as copyright infringement.
- 2.9 The School may need to work closely with the Police in the early stages of any investigation in order to ensure that the potential conflict between preserving evidence for investigation and safeguarding the School community is not compromised. Careful decisions will therefore need to be made, on a case-by-case basis, as to the balance between removing the post as soon as possible, against the risk of undermining any ongoing investigation.
- 2.10 Where the perpetrator/s may have broken the law the matter will be referred to the Police. In addition, whether or not the perpetrator/s may have broken the law the matter will also be considered under the School's Student Code of Conduct or the City of London Staff Disciplinary Procedures. School/City processes may need to be held in abeyance pending the outcome of any police investigation.
- 2.11 If a perpetrator remains unidentified within the community, then staff and students may still feel unsafe. In this case the School will need to work closely with the victim and outside agencies to ensure they have all the possible support and protection that it is practical to give.

SECTION 3: Training and Prevention

- 3.1 The School will provide practical advice to staff and students on how to safeguard against online abuse, how to respond should it occur and what to do next. This will form part of staff and student inductions.
- 3.2 The School is currently developing new workshops and induction modules for all staff and students around equality diversity and inclusion.

Further Resources, Policies and Guidelines

Guildhall School Staff Contact Directory

[Guildhall School Directory - myGuildhall](#)

Other relevant School documents

[Maintaining Good Campus Relations](#)

[Document Preview - Code of Professionalism and Conduct \(gsmd.ac.uk\)](#)

[Document Preview - Guildhall School – Anti-racism report \(February update\) \(gsmd.ac.uk\)](#)

[Document Preview - Guildhall School Prevent Duty - Summary 2020 \(gsmd.ac.uk\)](#)

[Safeguarding Policy 2020 \(gsmd.ac.uk\)](#)

[Document Preview - Data Protection Guidance \(gsmd.ac.uk\)](#)

[Document Preview - GYA - Safeguarding Protocol for Remote Teaching \(gsmd.ac.uk\)](#)

[Social Media Guidelines and Best Practice](#)

City of London Policies

[EmployeeHandbook-Bullying-and-Harassment-Procedure.pdf](#)

[Bullying-and-Harassment-Appendix2-Glossary-of-terms-and-discriminatory-behaviour.pdf](#)

[Bullying-and-Harassment-Appendix1-Legal-position-and-Definitions.pdf](#)

[EmployeeHandbook-Social-Media-Policy.pdf](#)

[EmployeeHandbook-Social-Media-Policy-Employee-FAQs.pdf](#)