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Online Harassment Policy

Brunel University Online Harassment Policy

Introduction

Brunel University of London is committed to providing an equitable, safe and inclusive, digital environment where the whole community is able to study, work, conduct research and live free from online harassment, intimidation, and threatening or violent behaviour. The University takes all online harassment incidents very seriously in line with its legal and regulatory duties and is committed to promoting online safety and welfare.

This policy aims to provide a framework for any member of the community who feels that they have been the subject of online harassment so that they can access appropriate support, take any appropriate action and ensure that all reports are addressed seriously and fairly, upholding the rights and dignity of all those involved.

Scope

This policy applies to all members of the University community including students, apprentices, doctoral researchers, colleagues, contractors, suppliers and visitors. The term 'student' refers to undergraduate and postgraduate students including those studying on campus, via distance learning, apprentices, short courses and doctoral researchers. Everyone should be treated with dignity and respect. The University expects everyone to facilitate and promote an environment in which harassment, bullying, and victimisation are regarded as unacceptable and to treat others with dignity and respect at all times.

Harassment, bullying, and victimisation can occur between students, between students and colleagues, between colleagues, or involving contractors, suppliers or visitors. Online harassment is not permitted within the University community. It is recognised that young people under the age of 18 are known to be at particular risk.

This policy provides support and advice to all members of the University wherever online harassment occurs. It applies in learning and research environments, working environments, accommodation, social activities. It also applies on and off campus when activities are linked to the University community, such as teaching and learning, work, accommodation, work placements, trips and internships, social and personal communications.

Brunel recognises that individuals whose social and cultural characteristics intersect, e.g. sex, gender reassignment, race, disability, sexuality and different faiths, are potentially more vulnerable to online harassment and may require additional support.

This policy forms part of the University's suite of policies on bullying and harassment, sexual misconduct and abuse. For information and guidance on how to seek support or report an incident, please consult the following policies/support:

- the Bullying and Harassment Policy for students - [Student Bullying and Harassment Policy Final August 2025](#)
- the [Dignity at Work Policy](#) for employees
- the [Sexual Violence and Sexual Harassment Policy](#) for the whole university community
- [Harassment and sexual misconduct support | Brunel University of London](#)

Policy Statement

The University commits to ensuring the following:

- Taking all reasonable steps to meet the University's legal and regulatory obligations to prevent online harassment, and address any inappropriate behaviours promptly to prevent issues from escalating.
- Creating a culture where all members of the University community treat others with respect and dignity, and online harassment is not permitted.
- Making the whole University community aware of Brunel's commitment to tackling online harassment and providing guidance and training on how to develop expectations of online behaviour, online safety, and how individuals can access appropriate support.
- Providing appropriate support to anyone involved in an online harassment incident.
- Creating an online environment where all departments, services, facilities and spaces are safe and welcoming.
- Providing robust procedures for students in the Non-Academic Misconduct Procedure as provided for by Senate Regulation and for colleagues in the Staff Disciplinary Policy and Procedures s.3 to deal with any allegations of online harassment in a fair, impartial and timely fashion.
- Handling all allegations of online harassment seriously and sensitively and investigating them promptly while protecting the individual rights of those involved, including those against whom an allegation has been made.
- Ensuring no member of the University community will be disadvantaged for reporting an incident or making a complaint in good faith. Malicious complaints may, however, lead to separate action being taken.
- Reviewing incidents annually through Student Services and / or Human Resources as appropriate to identify any trends that need to be addressed or investigated further.
- As set out in the university's [Freedom of Speech Statement](#), nothing in this policy shall be used as justification for restricting lawful freedom of expression.
- All members of the university will be made aware of the Single Comprehensive Source of Information relating to incidents of harassment and sexual misconduct to comply with the Office for Students' Condition of Registration E6 - ([Condition E6: Harassment and sexual misconduct - Office for Students](#)).

Key Definitions

Understanding bullying and harassment

Information can be found the University's Bullying and Harassment Policy - [Student Bullying and Harassment Policy Final August 2025](#)

Understanding online harassment

Online harassment can occur in formal and informal communications through teaching and workspaces. These include:

- Microsoft Teams
- Zoom
- Social media channels such as Facebook, X (formerly known as Twitter), TikTok, YouTube, Instagram, WhatsApp
- Blackboard Collaborate
- Live chat forums
- Web pages
- Emails
- Brightspace

Note this list is not exhaustive as technology is constantly evolving, with regular updates and new products constantly entering the market and / or being favoured by consumers.

Online harassment can be carried out by known individuals, groups and / or anonymously. It is referred to by a variety of different terms including cyberbullying, cyber-aggression, online bullying and cyber harassment. There are differing views about whether it is substantially similar or different to traditional bullying and harassment. For more detailed information see Appendix A below. Regardless of the term used it can be hurtful, distressing and damaging. It can seriously impact people's quality of life physically, emotionally and mentally, as well as having a detrimental effect on an individual's academic and professional success.

Some online harassment is carried out with the deliberate intention to cause harm and could amount to a criminal offence, such as a hate crime. However, this will not always be the case. Often individuals are unaware of the severity of their actions or the possibility of criminal repercussions, having become used to high levels of risk and abuse in the digital space. In addition, some might feel that an increased sense of anonymity, means they will not be held accountable. Meanwhile, bystanders who forward or share posts or content may not realise that they too could be committing harassment.

Universities have a duty of care at common law which includes providing protection against harassment and online harassment. The duty extends to access to, and provision of online services, platforms and / or content (HM Government 2019). A failure to ensure these are monitored, which could expose individuals to becoming the subject of abuse or at risk of abuse within the online environment materials, may indicate that the University is in breach of their duty of care. For more information,

see – <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2019/tackling-online-harassment.pdf>.

All students and employees are responsible for using the IT systems and mobile devices at Brunel University London in accordance with the following policies:

- Computer, Network and Email Use – <https://www.brunel.ac.uk/life/study-support/computer-services>
- Data Protection – <https://www.brunel.ac.uk/about/administration/information-access/data-protection>
- Safeguarding Children and Vulnerable Groups – <https://students.brunel.ac.uk/documents/Policies/Safeguarding-Children-Statement-2013.pdf>

Inappropriate behaviour may breach University regulations and / or constitute a civil or criminal offence.

Staying Safe Online

It is important that the whole University community considers how to keep safe online. Everyone should think carefully about what information they share and how they do so, protect their personal details and check that any online privacy settings are appropriately managed. People should not share photos or descriptions of sexually explicit or pornographic content as it is illegal. Furthermore, particular care must be taken when sharing any personal information or photos of young people under the age of 18 or vulnerable adults. If someone finds that they have been associated with inappropriate material online they should seek to get help as soon as possible either from the University or external agencies and to consider reporting the incident.

For more detail see below, and <https://www.mind.org.uk/information-support/tips-for-everyday-living/online-mental-health/safety-privacy/>

Seeking Support and Advice

No student is under any obligation to report an incident of online bullying or harassment. However, you are encouraged to get help as soon you can, to obtain advice about possible options for action and / or access appropriate support.

You are encouraged to act promptly and should not blame yourself or feel that you should wait until the situation is intolerable.

If you believe you are being bullied or harassed online, you can get help from one of the following:

- A personal tutor or lecturer, or another member of staff in your department. If you feel your studies have been affected by what has happened, you can consider applying for [Extenuating Circumstances](#), and your Personal Tutor will be able to provide more information.

- Reporting via the Report and Support Portal where you can disclose your personal details or make an anonymous report - <https://reportandsupport.brunel.ac.uk/>
- Contact the Student Welfare Team directly:
 - via phone +44 (0)1895 268268 (option 2)
 - email studentsupport@brunel.ac.uk
 - Visit the Student Hub in the Michael Sterling Building, open Monday to Friday, 9.00 am – 5.00 pm
 - Email: studenthub@brunel.ac.uk
- Speak to an adviser in the [Union Advice Service](#) in the Union of Brunel Students. You can book an online appointment using the booking form [here](#). Alternatively, you can call on 01895 269169, just leave a voicemail and the team will get back to you.
- In case of emergency, contact security-operations@brunel.ac.uk or call 999.

If another member of the University community witnesses someone being bullied or harassed online, they should be encouraged to ask for help using the same channels.

Measures should also be taken to protect the personal safety of everyone involved online at all times. If it is considered that there is a real threat to anyone's personal safety, this should be reported to Security immediately **by dialling 66943 internally or 01895 255786**.

Making a Formal Harassment Complaint

The usual process to raise a formal harassment complaint is via the [Student Complaints Procedure](#) and complaints should be made within three months. Information about this procedure can be found at: [Student Complaints - Guidance for Students](#).

Where a complaint of harassment has been raised under the Student Complaints Procedure, the relevant procedure used to investigate the complaint will depend on whether the reported party is a student or staff member and the context of the complaint. For example:

- Where concerns of harassment are raised by students about a colleague, the Student Complaints Officer will seek advice from the University's Human Resources Department on how to handle the concern. This may result in the investigation under the Student Complaints Procedure being paused temporarily, with the matter being referred to Human Resources for consideration under the relevant Human Resources policies and procedures, such as the [Disciplinary Policy and Procedure](#) and [Disciplinary Procedure for Consultants and Job Shop Workers](#). Once action and/or consideration of the matter has concluded under those procedures, Human Resources will notify the Student Complaints Officer. The Student Complaints Officer will then provide the student with an outcome to the complaint. Due to confidentiality, however, it may not be appropriate for the Student Complaints Officer to disclose specific details regarding consideration of the matter by Human Resources and/or full details of any action taken in respect of a colleague/s, particularly where disciplinary action is taken.

- Investigations into allegations of harassment made by students or colleagues against other Brunel students will usually be handled under the [Non-Academic Misconduct Procedure \(October 2024\)](#) in accordance with [Senate Regulation 6](#). Where a student about whom allegations are made is on a Professional Programme at the university, action may also, or alternatively be taken under the [Fitness to Practise Procedure \(October 2024\)](#) in accordance with [Senate Regulation 14 - Fitness to Practise \(October 2024\)](#).

Any incidents of harassment reported formally will be investigated within the time limits set out in the relevant procedure, with due consideration to the rights and privacy of the complainant, the reported party and any other individuals involved. Students will be kept informed about timescales and the procedure being used to consider the complaint by the Office for Student Complaints, Conducts or Appeals (OSCCA).

The University is not required to follow third party outcomes in its own decision making under the [Non-Academic Misconduct Procedure \(October 2024\)](#) as it is an independent process. However, such outcomes may be considered if relevant. This means that the University may take action under its internal disciplinary procedures if the Police decide not to investigate, or the Crown Prosecution Service (CPS) decides not to prosecute a potential criminal offence, and where a student or staff member is convicted or acquitted in criminal proceedings. This is because under the university's internal disciplinary procedures, a student or staff member is not being charged with a criminal offence, the evidence that can be considered, standard of proof and available penalties may all differ. Although the University is not bound by the outcome of any criminal prosecution, it may at its discretion, take any penalty imposed by a criminal court into consideration in determining any outcome under its internal disciplinary procedures.

The University may suspend an investigation into a harassment complaint where, for example, the alleged conduct could also constitute a criminal offence and is being investigated by the Police and dealt with within the criminal process. This is because the University could prejudice the criminal process if it were to start investigating the alleged conduct by interviewing witnesses and drafting witness statements.

Confidentiality

Reports of harassment will be handled with an appropriate level of confidentiality and according to data protection legislation, with information released only to those who need it for the purposes of investigating the concern or incident further. No third party will be told any more about the incident than is strictly necessary in order to obtain the information required from them to conduct a full and fair investigation. The person being investigated is normally asked to respond and full details of the matter will normally be shared with them to ensure transparency and fairness.

Where you have objections to details of the concern raised, or any other personal details being shared with any particular member of staff, or another student, or a third party, you should make this known to the person who is investigating the matter and they will discuss with you the extent to which they can consider the case fairly,

transparently and effectively in these circumstances. Where it is necessary to interview witnesses, the importance of confidentiality will be emphasised. It will be explained to everyone involved in the process that any breach of confidentiality may lead to disciplinary action.

Anonymity

The University is not normally able to fully investigate incidents of harassment which are submitted anonymously, or where you are not willing for your details to be known by others, because this may impede the university's ability to investigate the matter effectively, transparently, openly, and fairly. Where someone has reported a concern anonymously, they are unlikely to receive an individual, specific outcome regarding the concerns raised, as a full and fair investigation will not have been possible.

However, if a concern or incident is reported anonymously, it may be possible to provide general feedback to relevant parties about the issues raised, without disclosing the identity of the person who reported it. This will, however, depend on the specific circumstances of the concern and may not be possible in all cases.

Disclosure to Third Parties

Where reports of harassment are made to the University, it may, at its discretion without notifying the reporter, discuss or refer the concern to relevant third parties. This may be appropriate, for example, where a student is at immediate risk of harm to themselves or others, or to prevent a crime taking place. Relevant third parties may include the Police, employers, placement providers, sponsors, grant providers, research funding bodies or Professional Statutory and Regulatory Bodies (PSRBs).

The University will only, in exceptional circumstances, report an alleged crime to the Police contrary to the wishes of the reporting student, but in deciding whether to make such a disclosure and in deciding what information to disclose, the University will consider any potential harm that the unauthorised disclosure may cause to the reporting student.

Any data collected and (possibly) shared with third parties would be held in accordance with the applicable records retention policy.

Recording and monitoring harassment complaints

A record of formal harassment complaints received from students will be held in accordance with our records retention policy and the means of resolution will be kept by the University and reported annually as part of the University's monitoring and quality assurance processes. No information that will identify any individual will be available within the report.

Bullying and Harassment Training

- *Training for students* - As a community, it is important that we all understand what harassment means. Mandatory training is therefore provided to all new

students to ensure that they are appropriately informed to understand the university's policies and procedures and the types of behaviour that may constitute harassment or sexual misconduct. For students who may be triggered by the content of the training, they may inform the university and alternatives will be considered, but in the main it will be mandatory.

- *Training for colleagues* - training about what harassment means and how to respond appropriately takes a tiered approach at Brunel. For further information, contact Organisational Development.

Freedom of Speech at Brunel

Information can be found at the University's Freedom of Speech statement [Freedom of Speech Statement](#).

Appendix A – Further Information about Online Harassment Freedom of Speech at Brunel

Glossary of Different Forms of Online Harassment

This is not intended as an exhaustive list of all forms of online harassment behaviours as technology is constantly developing and as a result so is online harassment which continues to take on new and different forms. The definitions come from the UUK report on Tackling Online Harassment and Promoting Online Welfare and / or the relevant legislation (see section below).

Cyberbullying	This is a form of bullying using electronic means on the internet, social media sites and other digital spaces. It can include threats, rumours, sharing an individual's personal information, sexual remarks or hate speech.
Cyberstalking	This is the use of technology and digital communications to stalk or harass an individual, a group, or an organization. It is repeated and deliberate and can include threats, slander, libel, defamation, false accusations, solicitation for sex, identity theft or gathering information that can be used to harass or threaten.
Denigration	Sending or posting damaging comments or images of someone or criticize them in a derogatory manner. It can include to sully, defame or denigrate someone's character, or to belittle or disparage them such as their contribution to a project.
Doxxing	This is the internet based practice of researching e.g. through social media websites and broadcasting private or identifying information about an individual or organisation without their permission. It can be carried out for various reasons including harassment.
Exclusion	This is the act of not allowing somebody or preventing somebody from taking part in an online activity or activity. This can include marginalising, ostracising and leaving somebody out of a group.
Harassment	This is defined as unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.
Hate crime	This is a criminal offence which is perceived to be by the victim, or anybody else, to be motivated by hostility or prejudice towards someone's membership of a certain group race, religion,

	sexual orientation, transgender identity and / or disability.
Hate incident	This is a behaviour which whilst not a crime is still perceived by the victim, or anybody else, to be motivated by hostility or prejudice based on somebody's race, religion, sexual orientation, transgender identity and / or disability.
Image-based sexual abuse	This behaviour includes the non-consensual taking intimate or sexual images; the non-consensual sharing or posting intimate or sexual images and / or threats made to share intimate or sexual images. It is sometimes mistakenly referred by the media as revenge porn but it does not need to involve revenge.
Internet pile-on	This involves an attack by a large group of people against one person or a much smaller group with numerous online messages.
Masquerade attack	This is a digital attack that uses a fake identity to gain unauthorized access to personal computer information through legitimate access identification.
Sexting	This involves sending, receiving, or forwarding sexually explicit messages, photographs, or images, primarily between mobile phones, computer or other digital devices. This is illegal for young people under the age of 18 and for adults over 18 where it is done without the individual's permission, it is known as revenge porn.
Trickery	This is the use or practice of deception or tricks online to secure personal information to deceive, cheat, con or defraud often to blackmail an individual.
Trolling	To send or post a comment online which is deliberately offensive, inflammatory or provocative with the intention of upsetting someone or eliciting an angry response from them.
Upskirting	Upskirting is the practice of taking photographs or filming without permission https://en.wikipedia.org/wiki/Secret_photography under a person's clothing to capture their body or underwear and posted / shared online.
Virtual mobbing	This is inciting people to harass an individual or a group online with offensive, inflammatory or provocative comments, hashtags etc to cause reputational, mental, financial and / or emotional harm and distress.