

OfS Condition E6 compliance checklist

With the 1 August 2025 deadline fast approaching, HEFE institutions must move from planning to full implementation of Condition E6. The NDA ban has been in force since 1 September 2024, and now is the time to ensure all remaining obligations are fully operational, visible, and demonstrably effective. This section sets out a practical compliance checklist for the final four months — focusing on policy finalisation, training delivery, communication, and institutional readiness.

Deadline passed: 1 September 2024

1. Confirm NDA ban compliance (if not already done)

By now, your institution should have:

- Removed all non-disclosure clauses from relevant contract templates.
- Ceased using NDAs in cases involving harassment or sexual misconduct.
- Communicated this change internally to legal, HR, and disciplinary teams.
- Reviewed and, where possible, influenced partner institutions and placement providers to align with the ban.

If any of these items are incomplete, they should be prioritised immediately to avoid regulatory risk.

Target Deadline: May 2025

2. Finalise the single Comprehensive Source of Information (CSI)

The CSI must:

- Be clearly written, comprehensive, and include all required content (reporting procedures, training commitments, support options, investigation protocols, staff-student relationship policy, etc.).
- Reflect real-world institutional practices — not just policy statements.
- Be published prominently and publicly online, accessible without login.
- Be directly communicated to staff and students at least once per year.
- Include version control and change history

What to do now:

- Ensure CSI content is finalised, legally reviewed, and approved at governance level.
- Create a standalone, clearly labelled webpage or centralised document hub
- Embed links in student and staff portals, induction materials, prospectuses, and policy directories.
- Send university-wide communication introducing or reaffirming the CSI.



3. Ensure training is delivered and documented

Condition E6 requires that all staff and students receive tailored, evidence-based training on harassment and sexual misconduct.

By now, you should:

- Have developed or procured appropriate online or in-person training modules.
- Have launched mandatory training for all students — especially new 2025/26 cohorts.
- Have delivered staff-wide training on the CSI and related responsibilities.
- Have provided specialist training to relevant staff (e.g. complaints handlers, investigators, support staff).

Next steps:

- Chase non-completions and ensure tracking mechanisms are in place.
- Evaluate effectiveness through feedback or short assessments.
- Schedule refreshers or integration into onboarding for future cohorts.

4. Review and finalise key policies and procedures

If not already completed, immediately ensure:

- Staff-student relationship policy is in place — ideally including a ban on relationships where a power imbalance exists, or at minimum a disclosure and management regime.
- Investigation procedures are aligned with natural justice and clearly outlined in the CSI.
- Support services are visible and available for both complainants and respondents.
- Anonymous and third-party reporting is possible and clearly signposted.
- Freedom of speech considerations are embedded into the policy framework.

5. Communicate and promote

The focus should shift to ensuring awareness and uptake:

- Send targeted, accessible communications to all students and staff about reporting options and available support.
- Highlight training requirements and policy updates via email, LMS, and internal comms.
- Ensure marketing, recruitment, and onboarding materials clearly link to your CSI.

The goal: No one should arrive on campus without knowing what E6 is, how the university protects them, and what steps they can take.

6. Conduct a pre-deadline readiness audit

Conduct an internal compliance check:

- Can you demonstrate policy implementation, not just publication?
- Are students and staff aware of reporting tools and support services?
- Is all training complete and logged?
- Do you have a clear, accessible CSI with version tracking and all mandatory content?
- Are franchise/partnership and transnational education arrangements covered?
- Document this audit and assign owners for any outstanding issues.

7. Plan for ongoing monitoring and continuous improvement

Condition E6 is not a one-time fix. From August 2025 onwards:

- Build annual reviews of harassment policies into governance cycles.
- Track and analyse incident data, training completion, and student feedback.
- Monitor risks across franchises and international provision.
- Assign ownership for updating the CSI and maintaining training relevance.