Prevention of Bullying, Harassment, and Sexual Misconduct Policy

Version 9.0

Approved by the Board of Governors

Last reviewed: October 2026

This policy sets out the commitment of London School of Science and Technology ("LSST" or "the School") to foster an environment in which the dignity of all individuals is respected and in which people can work and study without fear of intimidation, hostility or abuse.

The following should be read in conjunction with the School's:

- *Equality and Diversity Policy* which protects people from unlawful discrimination;
- *Academic Freedom and Freedom of Speech Policy* which ensures academic discourse is characterised by objectivity and mutual respect;
- *Student Code of Conduct and Disciplinary Procedures* which sets out the School's expectations of its student body.

Employees of the School should refer to the Employee Handbook regarding expected standards of behaviour.

DOCUMENT INFORMATION

Document owner(s)*: CEO

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*The document owner is responsible for maintaining and updating the content of this document and ensuring that it reflects current practice at the School.

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1. INTRODUCTION

1.1. Harassment and bullying both involve behaviour which harms, intimidates, threatens, victimises, offends, degrades or humiliates people or undermines their dignity. LSST believes that people have the right to work and study without fear of bullying or harassment and is committed to fostering a supportive environment which enables people to succeed academically and professionally.

1.2. The School takes a zero-tolerance approach to any form of harassing or bullying behaviour and where members of the School's community are found to have engaged in such behaviour, we will not hesitate to take appropriate action.

1.3. The School will provide support for people who have been subject to bullying or harassing behaviour, whether on or off the School's premises.

1.4. Nothing in this policy is intended to inhibit students from exercising their rights under the *Education Reform Act 1988*, or as set out in the LSST Code of Practice on Freedom of Speech, to question and test received wisdom and put forward new ideas and controversial or unpopular opinions without fear of legal or disciplinary action. Therefore, a distinction must be made between actions and statements which could be considered harassment and those which may occur as part of a debate conducted for academic purposes.

2. SCOPE

2.1. This policy applies to all members of the School's community, namely students, staff and alumni involved in School activities. It also applies to the conduct of visitors and third parties (including contractors, non-executives, clients or customers of the School).

3. UNACCEPTABLE BEHAVIOUR

3.1. Any type of behaviour which is unacceptable to the person receiving it and which creates an intimidating, fearful, hostile or offensive environment or otherwise causes the person alarm or distress or is threatening, abusive or insulting is considered harassment. The following section gives some examples of the various behaviours that would be considered by the School to be forms of harassment or bullying. This list is not exhaustive.

3.2. Discrimination

3.2.1. The School expects everyone to be treated with dignity and respect regardless of any aspects of their identity. Additionally, the *Equality Act 2010* protects people from being discriminated against because of one or more protected characteristics, namely:

- Age
- Disability

- Gender reassignment
- Marriage or civil partnership status
- Pregnancy and maternity/paternity
- Race (including skin colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

3.2.2. Discrimination might be:

- **Direct –** when someone is intentionally treated less favourably than others for having one or more protected characteristics.
- **Indirect –** when rules and regulations/arrangements apply to everyone but put people with protected characteristics at an unfair disadvantage.
- **By perception –** when someone is perceived to have a protected characteristic and is treated unfairly because of it.
- **By association –** when someone is discriminated against due to their association with someone who has a protected characteristic.

3.2.3. Discrimination is covered in more detail in the School's *Equality, Diversity, and Inclusion Policy*.

3.3. Bullying

3.3.1. Bullying is behaviour involving misuse of power which undermines the integrity and confidence of a person or a group of people, causing them to feel vulnerable, humiliated, degraded, offended or frightened. Power can be considered as a position of authority, physical strength, knowledge and the power to coerce through fear, threats, blackmail and intimidation. Bullying can be physical, verbal or social and can be conducted openly or in a secretive manner.

3.3.2. It is important to acknowledge that it is possible for staff/ students to harass, bully and discriminate against their manager/supervisors as well as for managers / supervisors to harass, bully and/ or discriminate against their staff/ students.

3.3.3. Bullying is not limited to the protected characteristics within the Equality Act and can take many forms, including but not limited to:

- Spreading rumours, public ridicule or insulting, sarcastic or humiliating comments/ behaviour.
- Ignoring, refusing to communicate or cooperate (stonewalling).

- Constant criticism without constructive support.
- Overbearing supervision or other misuses of power or position.
- Sharing of materials considered not suitable for work (NSFW)*.
- Preventing or threatening to prevent someone's promotion, training or future career opportunities.
- Unfair work allocation.
- Gaslighting - i.e., psychologically manipulating somebody by instilling doubt in them in order to make them question their own memory, perception and reality.

3.3.4. These types of behaviour can be face-to-face, in written communication and through means of electronic communication (including emails, phone and on social media), in what is referred to as cyberbullying.

**NSFW generally refers to materials containing nudity, explicit sexual references, profanity, violence and/or other potentially disturbing subject matter. NSFW materials can be highly offensive and distressing to individuals and have no place within a professional environment.*

3.4. Harassment

3.4.1. Harassment refers to any unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct may include bullying behaviour and is often related to protected characteristics such as age, sex, disability, race, gender, religion or sexual orientation. Harassment may also occur in relation to a person's physical characteristics, personality or affiliations (*e.g.,* their physique, dress or trade union status).

3.4.2. Sexual harassment usually refers to unwelcome sexual advances or affectionate physical gestures such as touching, patting, gripping, pinching or kissing. More extreme examples of sexual harassment, which would constitute sexual assault, include simulated sexual acts as well as attempted or actual intercourse.

3.4.3. Sexual harassment may also take other more subtle forms, such as:

- Repeated compliments on someone's appearance.
- Commenting on the attractiveness of others in front of an employee.
- Discussing one's sex life in front of an employee.
- Asking an employee about his or her sex life.
- Circulating nude photos or photos of women in bikinis or shirtless men in the workplace.

- Making sexual jokes.
- Sending sexually suggestive text messages or emails.
- Leaving unwanted gifts of a sexual or romantic nature.
- Spreading sexual rumours about an employee.
- Stalking (which can be in person or through electronic means of communication.
- Boundary blurring and 'grooming' behaviours – when members of staff use their position of power to blur the boundaries between professional and personal relationships to gain control over and sexual access to students or other staff members.

3.4.4. Further information on sexual harassment and how to raise a concern is covered in the School's *Sexual Harassment and Misconduct Policy*.

3.4.5. A person may feel harassed or distressed even if they are not the intended target of the behaviour and/or if the perpetrator is unaware of, or has not intended this to be, the effect of their actions.

3.4.6. Harassment is both a criminal offence and a civil action. As with bullying, harassment can happen face-to-face or by electronic means of communication, which is referred to as online harassment.

3.5. Hate

3.5.1. Hate-motivated behaviour (often referred to as 'hate incidents' and 'hate crimes') includes expressions, actions or behaviour which are motivated by hostility or prejudice towards a person's race, religion, disability, sexual orientation or other protected characteristic. When the behaviour amounts to a criminal offence a hate incident is referred to as a hate crime.

3.5.2. Hate incidents/crimes can take many forms, for instance:

- Being ignored or excluded from conversation or group activities.
- Derogatory comments or behaviours, micro-aggressions.
- Display of racist/homophobic/Islamophobic/anti-Semitic/disablist behaviour.
- Encouraging others to engage in offensive, prejudiced and hateful behaviour.
- Incitement of racial/religious hatred.
- Anti-Semitism, Islamophobia and other forms of religious hatred.
- Name calling, insults, offensive 'banter' or 'jokes'.

- Verbal abuse.

- Unwanted touching and physical assault.

3.5.3. In addition to the above, the School is vigilant to the threat of radicalisation and the need to prevent people from being drawn into terrorism.

3.6. Victimisation

3.6.1. Victimisation is when a person is mistreated or put at a disadvantage because they have made or intend to raise a concern about discrimination, bullying and/or harassment, sexual or hate motivated misconduct, or have helped/intend to help another person raise a concern by providing information or evidence. Victimisation is unlawful under the Equality Act 2010 and, if proven, may result in disciplinary measures, including dismissal.

4. HOW TO RAISE A CONCERN

4.1. The School encourages its community to report unacceptable behaviour. Individuals are encouraged to report even if they were not the intended target of the behaviour.

4.2. Anyone who has experienced or witnessed behaviour which breaches this policy can report it confidentially in person or via email:

- Students should contact their campus support team. Contact details can be found on the School's website at this link: https://www.lsst.ac/support-and-facilities/student-support/;

- Students can also use the School's *Complaints Policy and Procedures.*

- Employees should raise the issue using LSST's grievance procedures, which can be found in the Employee Handbook or contact the School's HR department at hr@lsst.ac

4.3. The School encourages informal resolution between the parties involved in any complaint or grievance and may assist by appointing a neutral person to mediate or facilitate a discussion to resolve the matter before any formal procedure is invoked. This is often the most effective way to resolve the issue where individuals are not aware of the effect of their behaviour.

4.4. The School recognises that informal resolution may not always be possible or appropriate. The School has a duty of care to protect its community from bullying, harassment and/ or victimisation and will need to be aware of such occurrences and the risks they pose so that it can act accordingly. As such, severe and deliberate breaches (such as instances of violence, prolonged bullying, stalking/ sexual harassment or discriminatory bullying or harassment) should always be reported.

4.5. Any difficulty in defining what constitutes bullying, harassment and/ or victimisation should not deter anyone from reporting behaviour which causes them or another person

distress. No person will be penalised or treated less favourably for making a disclosure of bullying, harassment and/ or victimisation made in good faith.

4.6. The School is aware that the act of making a malicious or false complaint against a person may, in itself, be construed as a form of harassment or bullying and the School will act accordingly.

4.7. The School will investigate breaches of this policy in accordance with the procedures set out in its disciplinary procedures. All parties involved in an investigation will be treated fairly and with dignity and the matter will remain confidential for the duration of an ongoing investigation. Any proven breaches of this policy may be grounds for disciplinary action, which in the severest instances may include dismissal, expulsion or termination of contracts for third parties.

4.8. The School will provide support to anyone who has been subject to bullying or harassing behaviour and where necessary will refer individuals to external support agencies or services.

4.9. The School has a public duty to report instances of criminal behaviour and will support victims of crime where they need to engage with the relevant authorities.

4.10. If you are a person against whom a complaint of harassment or bullying has been made, you may seek advice, which will again be treated in confidence, from Student Support Services if you are a student or the HR department if you are an employee.

4.11. Where a complaint of bullying or harassment raises Prevent or Safeguarding concerns, formal disciplinary procedures must be used and reference should be made to those policies.

5. RESPONSIBILITY FOR THE IMPLEMENTATION OF THIS POLICY

5.1. The Board of Governors will be responsible for overseeing the implementation of this policy and for promoting a safe work and study environment at the School.

5.2. All members of the School's community have a responsibility to:

- Engage positively with each other and treat each other with dignity and respect.
- Help prevent and tackle unacceptable behaviour by being sensitive of the reactions and needs of others, by calling out or reporting discriminatory statements, attitudes and behaviour and by supporting colleagues and peers who have experienced or witnessed unacceptable behaviour.
- Undertake relevant training as part of their induction as well as their continuous personal and professional development and apply this to their ongoing practice.

5.3. As part of their leadership and management roles, all senior leaders, Heads of Department, line managers and Programme Leaders have a personal responsibility to undertake the following (in addition to 5.2 above):

- Lead by example in implementing this policy, being a role model for positive inclusive behaviour.

- Promote, implement and communicate this policy, making sure that everyone in their area of responsibility is aware of it, has received appropriate training and understands their responsibility in relation to it, utilising advice and support from HR, Student Services and the SU (the Students' Union). This includes drawing the attention of all contractors, secondees and agency workers to this Policy as part of their induction.

- Manage their staff fairly and in line with all HR policies and procedures and take action to ensure that their working/studying environment is free from harassment and bullying.

- Seek and take into account advice on managing dignity and respect issues from HR and Student Services and provide support to students, staff and visitors, either directly or by signposting them to appropriate advice and support.

- Undertake actions to help resolve issues informally wherever possible.

- Learn from any issues raised (where these are founded e.g., following an investigation) and to take appropriate action to prevent or mitigate any reoccurrence.

- Address concerns relating to harassment, bullying, discrimination or victimisation as promptly and effectively as possible and within reasonable timeframes.

- Attend and engage fully with identified training.

6. REVIEW AND UPDATE

6.1. This policy and procedure will be reviewed and updated annually by the Executive Committee. Changes to it will be ratified by the School's Board of Governors.

VERSION HISTORY

Version	**1.0 – 5.0**	
Original author(s):	Deputy CEO Legal Advisor	
Reviewed by:	Executive Committee	September 2015 September 2016 September 2017 September 2018 September 2019
Version	**5.1**	
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Version	**5.2**	
Revised by:	Quality Unit Deputy CEO	
Revision summary:	*Annual review; minor factual updates.*	
Approved by:	Board of Governors	October 2021
Version	**5.3**	
Revised by:	Deputy CEO General Counsel	
Revision summary:	*Annual review; minor factual updates.*	
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Version	**5.4**	
Revised by:	Quality Unit Deputy CEO	
Revision summary:	*Annual Review*	
Approved by:	Board of Governors	May 2023
Version	**6**	
Revised by:	Quality Unit Deputy CEO	
Revision summary:	*Annual Review; minor factual updates and version control applied.*	
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Version	**7**	
Revised by:	Quality Unit Deputy CEO	
Revision summary:	*Annual review and updates, title change to include sexual misconduct, minor grammatical corrections, document format applied, version control applied.*	

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Revision summary:	***Annual review and updates -*** Policy name updated from Equality and Diversity Policy to Equality, Diversity, and Inclusion Policy under 3.2.3. Reference made to Sexual Harassment and Misconduct Policy under point 3.4.4. Minor grammatical corrections, document formatting applied, version control applied.	
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