



Sexual Harassment and Misconduct Policy

Version 1.2

Approved by the Board of Governors

Last Amendment: July 2025

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, Diversity, and Inclusion Policy*
- *Prevention of Bullying, Harassment, and Sexual Misconduct Policy*
- *Student Code of Conduct and Disciplinary Procedures*
- *Personal Relationships Between Staff and Students Policy*

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



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1. Introduction

- 1.1. London School of Science and Technology (LSST) is committed to fostering a safe, respectful, and inclusive academic and working environment, free from all forms of sexual harassment and misconduct. In line with the Office for Students (OfS) Condition of Registration E6, we take a zero-tolerance approach to sexual misconduct: any reported incidents will be taken seriously, investigated thoroughly, and addressed appropriately.
- 1.2. This policy applies to all students, staff, and third parties, and reflects LSST's commitment to both responding to and actively preventing sexual harassment, through education, accountability, and institutional culture change.
- 1.3. The School recognises that any individual can be affected by these issues. Support will be provided to all who have been subjected to sexually inappropriate behaviour, whether on or off the School's premises.

2. Scope

- 2.1. This policy applies to all members of the School's community, including students, staff, and alumni involved in School activities. It also extends to the conduct of visitors and third parties, such as contractors, non-executive members, clients, and customers of the School.
- 2.2. Additionally, this policy applies where an incident occurs, but not limited to:
 - On School campuses;
 - At temporary teaching sites used by the School;
 - Via the School's systems and digital platforms;
 - Via email and social media platforms;
 - During in person and online teaching;
 - During placements, visits, and study trips;
 - Within the Student Union and during any Student Union events.

3. Definitions and Unacceptable Behaviours

- 3.1. **Sexual harassment and misconduct** refer to unwanted sexual advances or behaviours that violate a person's dignity and create an intimidating, hostile, degrading, humiliating, or offensive environment.
 - 3.1.1. Such behaviour can take many forms, including but not limited to:

- Attempted or actual intercourse without consent;
- Simulated sexual acts without consent;
- Physical acts without consent, such as hugging, massaging, patting, groping, pinching, or kissing;
- Propositions or demands for sexual favours;
- Sharing explicit images, nudes, or pornographic material without consent;
- Inappropriately exposing one's sexual organs to another person;
- Suggestive looks, staring, or leering;
- Repeated compliments on another person's appearance;
- Discussing one's sex life in front of another person
- Intrusive questions regarding another person's sex life;
- Making sexual comments, jokes, or gestures;
- Sending sexually suggestive text messages or emails;
- Leaving unwanted gifts of a sexual or romantic nature;
- Spreading sexual rumours about another person;
- Stalking (in person or through electronic means); or
- Boundary blurring or grooming behaviours, where a member of staff uses their position of power to blur the boundaries between professional and personal relationships in order to gain sexual access to students and other staff members.

3.1.2. Sexual harassment can happen to people of any gender identity or sexual orientation, and may be perpetrated by someone of the same sex, a different sex, or any gender identity. Sexual harassment can also be experienced by any individual regardless of age, disability, faith, relationship status, ethnicity, nationality, economic background, profession, and employment status, not limited to traditional workplace settings.

3.1.3. A person may feel harassed or distressed even if they are not the intended target of the behaviour, and even if the perpetrator is unaware of or did not intend the effect of their actions.

3.2. **Consent** refers to the voluntary agreement to engage in a specific activity. It requires the person to have both the capacity and the freedom to make that choice, without any form of coercion, pressure, manipulation, or impairment.

3.2.1. **Capacity to consent** refers to a person's ability to understand the nature and consequences of the activity they are agreeing to. A person lacks capacity to consent if they are:

- Under the influence of drugs or alcohol;
- Asleep or unconscious;
- Below the age of consent; or
- Experiencing cognitive impairments that affect their ability to make informed decisions.

3.2.2. **Freedom to consent** refers to a person's ability to make a voluntary choice without being subjected to pressure, manipulation, intimidation, coercion, or fear of consequences. The person must feel free to say 'yes', 'no', or to change their mind at any time without facing threats or retaliation.

3.3. **Complicity** refers to the act of knowingly ignoring, enabling, or failing to take appropriate action against the sexually harassing behaviours of another individual. This includes bystanders, supervisors, or colleagues who contribute to an environment where harassment is tolerated or unchallenged through their inaction.

4. Institutional Responsibilities

4.1. LSST is committed to:

- Raising awareness through mandatory training and induction for students and staff;
- Implementing preventive measures, including risk assessments and codes of conduct;
- Providing accessible reporting and clear investigative processes;
- Offering tailored support to individuals affected by sexual misconduct; and
- Recording and reviewing sexual harassment data to monitor institutional responses and trends.

5. How to Raise a Concern

5.1. The School recognises that individuals have the right to choose how they wish to address a concern. Deciding to pursue resolution does not prevent the matter from being formally reported in the future.

5.2. Individuals are encouraged to formally report incidents of sexual harassment and misconduct as soon as reasonably practicable, even if they were not the direct target

of the behaviour (See Appendix A). Anyone who has experienced or witnessed conduct that breaches this policy can disclose information either in person or via email using the following channels:

- Students can contact a member of staff to disclose information and, if desired, fill out a formal report (see Appendix A). Please note that simply disclosing information does not initiate a formal investigation, unlike a written report. Staff at LSST are trained and committed to making you feel safe and secure at your respective campuses, and different options can be discussed to determine how you wish to proceed with a disclosure (see Appendix B).
- Students can also directly contact their respective Student Support Teams. Contact details per campus are available on the School's website at this link: [Student Support - London School of Science & Technology](#)
- Students should also refer to the processes outlined in their respective awarding body's *Student Complaints Policy and Procedures*, and *Student Code of Conduct and Disciplinary Procedures*,
- Staff should contact their Line Managers, or the School's HR department at hr@lsst.ac.
- Staff should also refer to the grievance procedures outlined in Section 14 of the *Employee Handbook*.

5.3. Additional Guidance for BNU Students Only:

5.3.1. BNU Students may also report incidents of harassment and/or sexual misconduct directly to BNU, without first reporting the matter to LSST.

5.3.2. Guidance on how to submit the report –

- [Student Conduct Procedure](https://www.bucks.ac.uk/sites/default/files/2025-07/Student%20Conduct%20Procedure.pdf) - <https://www.bucks.ac.uk/sites/default/files/2025-07/Student%20Conduct%20Procedure.pdf>
- [Student Prevention of Harassment and Sexual Misconduct Policy](https://www.bucks.ac.uk/sites/default/files/2025-07/Student%20Prevention%20of%20Harassment%20and%20Sexual%20Misconduct%20Policy.pdf) - <https://www.bucks.ac.uk/sites/default/files/2025-07/Student%20Prevention%20of%20Harassment%20and%20Sexual%20Misconduct%20Policy.pdf>

5.4. Individuals should note that reports on sexual harassment and misconduct may be made anonymously, although this may limit the School's ability to act.

5.5. Reported incidents will be treated confidentially and will only be shared with the explicit permission of the individual disclosing the information, unless there are deemed to be safeguarding risks to any party involved.

5.6. A reporting diagram has been included under Appendix B for further guidance on the reporting channels and support mechanisms in place at LSST.



- 5.7. Support will be provided promptly and in confidence to anyone who has been subjected to sexual harassment or misconduct. Where necessary, the School will refer individuals to appropriate external support agencies or services.
- 5.8. A full list of internal and external support services is included under Annexes 1 and 2.

6. Support for Those Affected

- 6.1. Support will be offered by the School to individuals confidentially and with their consent, regardless of whether a formal complaint is submitted. This may include:
 - Academic or workplace adjustments;
 - Mental health and wellbeing support;
 - Signposting to relevant specialist services;
 - Ongoing pastoral check-ins.
- 6.2. Guidance for staff on how to provide appropriate support and handle cases of sexual assault is included under Annex 1.
- 6.3. A full list of internal and external support services is included under Annex 2.

7. Risk Assessment

- 7.1. A risk assessment will be undertaken by the Campus Student Support Team within 48 hours of receiving any reports of sexual harassment or misconduct to determine if immediate actions need to be implemented ahead of the investigation process, depending on the nature of the complaint or allegation outlined in the report.
- 7.2. The implementation of any temporary measures will be considered in line with the School's *Fitness to Study Policy*, and will be put in place to protect individuals while matters that may constitute a breach of this policy are being dealt with.
- 7.3. The School will inform the concerned parties in writing of the measures following the risk assessment, as well as the time period for which they will apply (see Appendix C)

8. Investigation into Complaints or Allegations

- 8.1. Breaches of this policy will be investigated in accordance with the procedures set out in this policy, the *Employee Handbook* for staff, and the *Student Code of Conduct and Disciplinary Procedures* for students.
- 8.2. All parties involved in an investigation will be treated fairly and with dignity in accordance with the *Equality, Diversity, and Inclusion Policy*. The matter will remain confidential throughout the course of the investigation. Proven breaches of this policy

may result in disciplinary action, which could include dismissal, expulsion, or termination of contracts for third parties.

- 8.3. The School also recognises that making a malicious or false complaint against a person may constitute a form of harassment or bullying. Such cases will be addressed in accordance with the *Prevention of Bullying, Harassment, and Sexual Misconduct Policy*.
- 8.4. Upon receiving a report, an appointed investigating officer within the relevant campus Student Support team will review the information provided, and will contact the person making the report within 5 working days to assure confidentiality, discuss support channels available, gather evidence and information, and outline potential next steps.
- 8.5. Within 10 working days of receiving the report, the Investigating Officer will arrange meetings with all relevant parties separately to discuss the nature of the complaint or allegation in detail. Relevant parties include the complainant, the respondent, and any witnesses. The complainant should understand what information will be shared with the respondent prior to the Investigating Officer's meeting with the respondent.
- 8.6. A report will then be produced outlining the Investigating Officer's findings and recommended next steps, which will subsequently be released to both the complainant and the respondent. Any notes taken by the Investigating Officer during individual meetings with relevant parties will not be released to said parties with the final report.
- 8.7. Should a decision be made to proceed with the School's disciplinary process, any further actions will be undertaken in line with the *Student Code of Conduct and Disciplinary Procedures*.
- 8.8. The Investigating Officer will be required to provide regular updates and keep all parties informed throughout the investigation process, particularly in the event of any delays.
- 8.9. LSST will endeavour to complete investigations into reported incidents of sexual harassment and misconduct within 20 working days. However, this timeline may vary depending on factors such as police involvement, witness or evidence availability, and the overall complexity of the case.

9. Police Investigation and Legal Proceedings

- 9.1. If the person who has disclosed an incident has made an independent report to the police, they may still choose to make a formal complaint to LSST.
- 9.2. However, LSST does not have the legal investigatory powers of the police and cannot make determinations regarding criminal guilt. Any disciplinary action undertaken by the School is based on a breach of the School's Sexual Harassment and Misconduct Policy, and is not a substitute for a police investigation or a criminal prosecution.

- 9.3. The initiation or conclusion of legal proceedings does not preclude the School from pursuing its own disciplinary process, should it be deemed appropriate or necessary. Additionally, if the police are unable or unwilling to proceed, this does not preclude the School from taking its own action under institutional policy.

10. Intimate Personal Relationships Between Staff and Students

- 10.1. LSST recognises that staff and students have a right to private lives and values positive social interaction within the School community. However, to protect the integrity of the learning environment and uphold professional boundaries, personal or intimate relationships between staff and students are strictly prohibited.
- 10.2. Any existing personal or intimate relationships that began prior to 1st August 2025 must be disclosed to the School (see Appendix D). This allows LSST to assess and manage any potential or actual conflicts of interest and ensure appropriate safeguards are in place.
- 10.3. For further information on LSST's procedures and safeguards to prevent abuses of power and sexual misconduct, please refer to the Personal Relationships at Work Policy.

11. Training for Staff and Students

- 11.1. All staff members at LSST are required to undertake mandatory training to understand what constitutes sexual harassment and misconduct, the concepts of capacity and freedom to consent, complicit behaviours, and the appropriate actions to take if a student discloses a complaint or allegation to them.
- 11.2. Further guidance for staff on how to provide appropriate support and handle cases of sexual assault is included under Annex 1.
- 11.3. Training sessions are also mandatory for the School's Designated Safeguarding Lead and Officers, as well as members of the Student Union, to ensure their understanding of sexual harassment and misconduct.
- 11.4. Additionally, the School requires all newly enrolled and returning students to undergo training during their induction period to raise awareness to issues of sexual harassment and misconduct, and to ensure that they are aware of the support that is available to them.

12. Freedom of Speech and Academic Freedom

- 12.1. LSST is committed to addressing sexual misconduct while simultaneously upholding the principles of freedom of speech and academic freedom. The School recognises that, in an educational context, students may encounter ideas, materials, or discussions that they find challenging or uncomfortable, but which do not constitute harassment or sexual misconduct.

- 12.2. LSST supports the open exchange of ideas, even where those ideas may be controversial or provoke disagreement. Academic freedom includes the right of staff and students to explore, debate, and teach within their disciplines without fear of censorship or institutional discipline, provided such activities are conducted respectfully and in line with the School's values.
- 12.3. Freedom of speech and academic freedom do not protect speech or conduct that amounts to unlawful harassment, discrimination, or sexual misconduct. The School distinguishes between protected academic expression and behaviours that violate the dignity or safety of others.
- 12.4. In applying this policy, the School will take care to ensure that efforts to address sexual misconduct do not inadvertently suppress legitimate academic discussion or free expression. Likewise, the right to free speech does not override the duty to foster a safe and inclusive learning environment.

13. Confidentiality and Data Handling

- 13.1. All concerns, complaints, and allegations raised will be handled sensitively and treated with confidentiality in line with GDPR, subject to cases where there is a legal obligation to involve external agencies – such as in cases where a criminal offence may have been committed, or where maintaining confidentiality would pose a risk to the reporter or others.

14. Related Policies

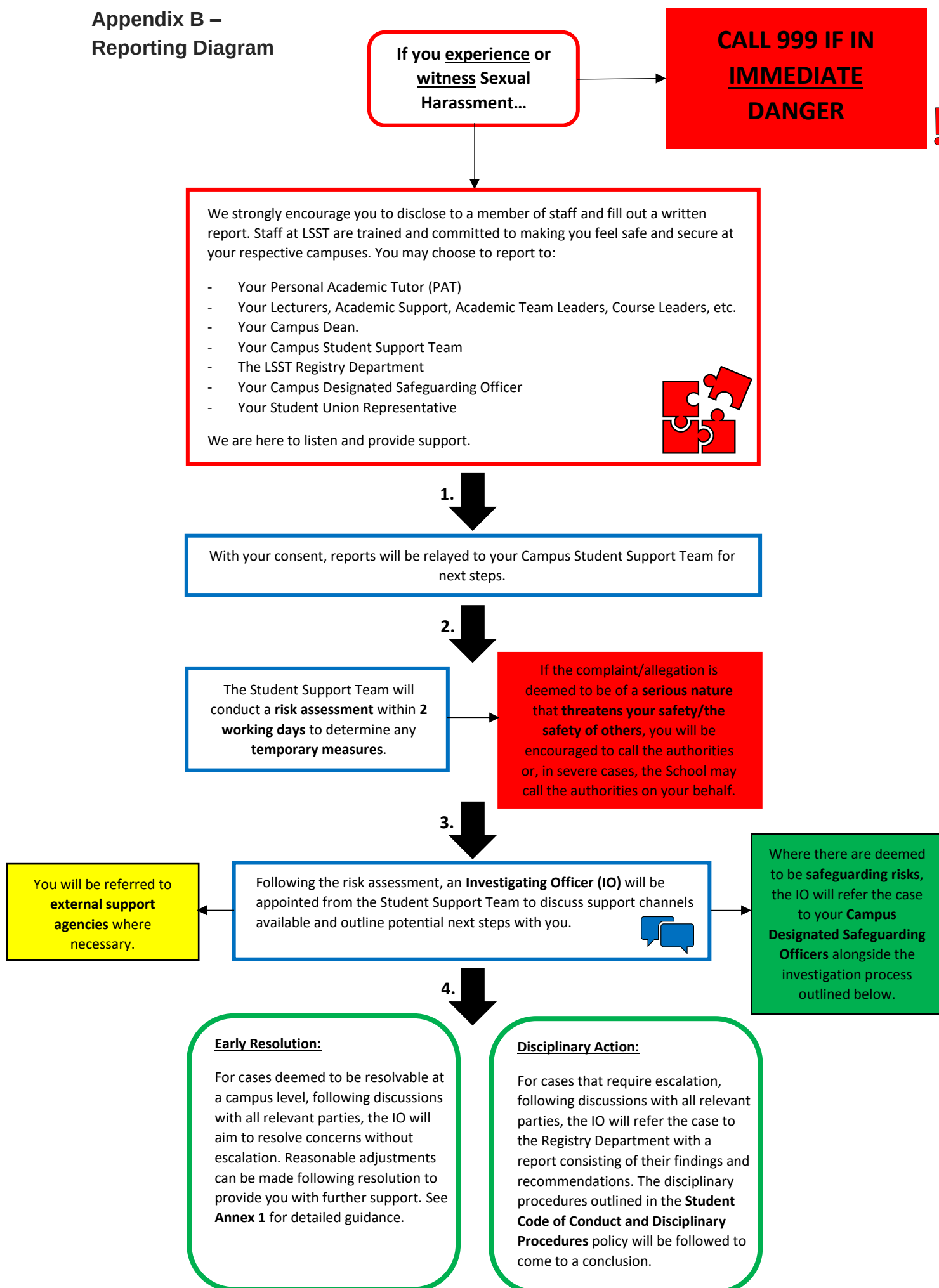
- Prevention of Bullying, Harassment, and Sexual Misconduct Policy
- Personal Relationships at Work Policy
- Safeguarding Policy
- Student Code of Conduct and Disciplinary Procedures Policy
- Student Complaints Policy and Procedures

Appendix A – Sexual Harassment and Misconduct Reporting Template

Sexual Harassment and Misconduct Report (to be emailed to the Campus Student Support Team)

Name of Person Completing Report			
Awarding Body/Programme/Level			
Location (Campus Name/Head Office)			
Email		Telephone	
Name/s of Person/s Affected			
Address			
Location (Campus Name/Head Office)			
Email		Telephone	
Incident to report <i>Briefly describe the circumstances of the incident:</i>			
Date of Incident			
Time of Incident			
Location of Incident			
Name/s of Potential Witness			
Address			
Email		Telephone	
Date Completed		Date Referred to Campus Student Support Team	
Signature			

Appendix B – Reporting Diagram



Appendix C – Risk Assessment Form Template

This form must be completed by a member of Student Support during the Risk Assessment to determine whether any temporary measures need to be implemented. Any considerations should, if necessary, be made accordance with the School's *Fitness to Study Policy*.

Score System:

Score	Likelihood of Risk to Occur
1	Highly Unlikely
2	Unlikely
3	Possible
4	Likely
5	Highly Likely

Overall Score	Risk Category
6 – 13	Low
14 – 21	Medium
22 – 30	High

Details:

Name of Respondent			
Awarding Body/Programme/Level			
Location (Campus Name/Head Office)			
Email		Telephone	
Name of Person Completing Risk Assessment			
Role/Job Title			
Date of Risk Assessment			

Overall Risk Assessment:

Element	Likelihood					Comments
	1 Highly Unlikely	2 Unlikely	3 Possible	4 Likely	5 Highly Likely	
<i>Risk to self</i>						
<i>Risk to other students</i>						
<i>Risk to staff</i>						

Additional notes/comments			
<i>Please include any recommendations for temporary measures and the suggested time period for which they should apply.</i>			
Signature		Date	

Appendix D – Disclosure of Personal Relationship Report Template

Disclosure of Personal Relationship Report

For students to complete and email to their Campus Student Support Team. Staff should follow their HR processes outlined in the *Personal Relationships at Work Policy*.

Your Details:			
Name of Person Completing Report			
Position			
Location (Campus Name/Head Office)			
Email		Telephone	
Other Party's Details:			
Name			
Job Role			
Location (Campus Name/Head Office)			
Nature of Relationship Please state whether the relationship is of a close personal nature i.e., friend or relative or an intimate/romantic relationship, etc.			
Month/Year Relationship Began If intimate/romantic.			
Declaration I understand the following: 1. It may be necessary for permanent or temporary adjustments to be made to remove any real or perceived conflict of interest arising from the relationship. 2. This information will be stored securely and managed in accordance with data protection legislation. 3. I have read and understood the Personal Relationships at Work Policy.			
Signature		Date	

Annex 1 – Guidance for staff on handling disclosures of sexual assault or sexual violence

If a disclosure of sexual harassment, misconduct, or abuse is made to you:

DO:	DON'T:
Stay calm.	Panic.
Act on the disclosure promptly.	Delay.
Recognise your own feelings, but keep them to yourself.	Express shock or embarrassment or other opinions about what you are told.
Use language that they can understand.	
Reassure them that: • He/she has done the right thing in telling you, • He/she is not to blame, • You believe he/she is telling the truth.	• Probe for more information, • Use leading questions.
Ask open questions, e.g. “what happened?”	Ask presumptive questions, e.g. “did Charlie do this?”
Listen carefully.	Make them repeat the story.
Record what they are saying and keep this set of notes. If you do not have writing materials to hand, do this immediately after you have finished talking.	
Explain what you will do next (i.e. contact your line manager and refer the report to the Campus Student Support Team) in a way that is appropriate to their age and emotional state.	Promise confidentiality to them.
Contact your line manager and report to the Campus Student Support Team.	Approach the person against whom the allegation has been made or discuss the disclosure with anyone other than the Campus Student Support Team and other relevant personnel.
Seek advice and support for yourself (see External Guidance Support Service links below).	

External Guidance Support Services:

Service	Type	Contact Details & Links
Rights of Women – Sexual Harassment at Work Advice Line	Free employment legal advice (women in England & Wales)	Tel: 020 7490 0152 (Mon–Tues 6–8pm; Wed–Fri 10–12pm) Guide & templates: https://www.rightsofwomen.org.uk/get-advice/sexual-harassment-at-work-law/
Acas – Specialist Help & Helpline	Impartial advice on complaints, policies, legal rights	Tel: 0300 123 1100 (Mon–Fri 8–6pm) Support: https://www.acas.org.uk/sexual-harassment
EHRC – Employer Guidance & Regulator	Legal guidance for employers & employees	Guidance: https://www.equalityhumanrights.com/our-work/sexual-harassment-workplace
UNISON – “UsToo” Workplace Campaign & Support	Union support (public sector)	Tel: 08000 857857 Campaign: https://www.unison.org.uk/our-campaigns/ustoo/
Protect (formerly Public Concern at Work)	Confidential advice on harassment/whistleblowing	Tel: 020 3117 2520 Advice: https://protect-advice.org.uk/sexual-harassment-and-whistleblowing/
NABS – Advertising/Marketing Sector Support	Support for harassment victims in marketing/advertising	Tel: 0800 707 6607 Email: support@nabs.org.uk Resources: https://nabs.org.uk/advice/sexual-harassment/
Prospect – Sexual Harassment Support Service	Union guidance and legal advice	Guide: https://prospect.org.uk/article/sexual-harassment/

Annex 2 – Links to external support organisations and networks

Main Contacts

Name of Service	Type of Service	Contact Details/Links
Rape Crisis England & Wales	24/7 rape and sexual abuse support	Tel: 0808 500 2222 Website
Brook	Advice on sex and consent	Website
The Survivors Trust	A national organisation supporting service in the UK, confidential help 7 days a week	Tel: 0808 801 0818
Samaritans	A national organisation supporting service in the UK, 24 hours a day, 7 days a week	Tel: 116 123
The National Health Service (NHS)	Help after rape and sexual assault	Website

Wembley Campus

Name of Service	Type of Service	Contact Details/Links
Cranstoun Harrow DASS	Domestic abuse (all genders)	Tel: 020 8129 5438 Email: harrowdass@cranstoun.org.uk Referral Form
Refuge – National Domestic Abuse Helpline	Domestic abuse	Tel: 0808 2000 247 Website
Women & Girls Network Helpline	VAWG support (women/girls)	Tel: 0808 801 0660 Live Chat
Survivors UK	Male sexual abuse support	Tel: 020 3598 3898 Referral Form
Stay Safe East	Support for disabled survivors	Tel: 07865 340122 Email: referrals@staysafe-east.org.uk

Elephant and Castle Campus

Name of Service	Type of Service	Contact Details/Links
London Survivors Gateway	Sexual violence support	Tel: 0808 801 0860 Referral Form
The Havens (SARC)	Sexual assault referral centre	Tel: 020 3299 6900 Website
RASASC	Sexual violence support	Tel: 0808 802 9999 Website
Solace Women's Aid	Domestic & sexual violence	Tel: 0808 802 5565 Website
Survivors UK	Male sexual abuse support	Tel: 020 3598 3898 Referral Form

Stratford Campus

Name of Service	Type of Service	Contact Details/Links
Newham DSV Service (Hestia)	Domestic & sexual violence	Tel: 0808 196 1482 Email: InfoNewhamDSV@hestia.org Website
London Black Women's Project	Support for BME women	Tel: 020 8472 0528 Website
Solace Women's Aid	Domestic & sexual violence	Tel: 0808 802 5565 Website
East London Rape Crisis	Sexual violence support	Info & Helpline
Survivors UK	Male sexual abuse support	Tel: 020 3598 3898 Referral Form

Luton Campus

Name of Service	Type of Service	Contact Details/Links
Victim Support – Luton IDVA	Domestic abuse advocacy	Tel: 01582 488777 Website

Bedfordshire Sexual Abuse Partnership	Sexual/domestic abuse	Directory
Luton All Women's Centre	Domestic & sexual violence	Referral Form
The Emerald Centre (SARC)	Sexual assault support	Info Emerald Centre – SARC
Stepping Stones Luton	General abuse support	Support Form
Mens Advice Line	Domestic abuse (men)	Domestic Abuse Helpline for Men Men's Advice Line UK

Aston Campus

Name of Service	Type of Service	Contact Details/Links
Birmingham & Solihull Women's Aid	Domestic & sexual violence	Tel: 0808 800 0028 Website
Birmingham LGBT – IDVA	LGBT+ domestic abuse	Tel: 0121 643 0821 Website
Anawim	Domestic & financial abuse	Referral Page
Men's Advice Line	Domestic abuse (men)	Domestic Abuse Helpline for Men Men's Advice Line UK
Refuge – National Helpline	Domestic abuse (women)	Tel: 0808 2000 247 Website

Memo House Campus

Name of Service	Type of Service	Contact Details/Links
Cranstoun (Ealing)	Domestic abuse support	Tel: 020 8129 5438 Email: harrowdass@cranstoun.org.uk
Refuge – National Helpline	Domestic abuse (women)	Tel: 0808 2000 247 Website



Galop LGBT+ Helpline	LGBT+ domestic/sexual violence	Tel: 0800 999 5428 Website
Rape Crisis England & Wales	Sexual violence support	Tel: 0808 500 2222 Website
Women's Aid	Domestic violence (women)	Website
Survivors UK	Male sexual abuse support	Tel: 020 3598 3898 Referral Form

Version History

Version	1.0
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Version	1
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Revision summary:	New policy written to cover OfS Condition E6 – Sections written on definitions and unacceptable behaviours, how to raise a concern, reporting process, risk assessment process, support provided, investigation process, training provided, and confidentiality. Appendices and Annexes added to include reporting template, reporting diagram, and external support services. Minor grammatical corrections, document format applied.
Approved by:	The Board of Governors June 2025
Version	1.1
Revised by:	Quality Unit
Revision summary:	Minor additions – Section 2.2 added, section 5 updated to reflect the difference between disclosing information and formally reporting, section 10.2 added, section 12 added on academic freedom and freedom of speech, appendices C and D added, main contacts added under annex 2. Minor grammatical corrections, document format applied, version control applied.
Approved by:	The Board of Governors July 2025
Version	1.2
Original author(s):	Quality Unit
Revised by:	Quality Unit
Revision summary:	Minor additions – Section 5.3 added on additional guidance for BNU students, section 10 on intimate personal relationships updated to reflect LSST's stance on relationships between staff and students, additional contacts added under annex 2. Minor grammatical corrections, document format applied, version control applied.
Reviewed by:	Publications Committee July 2025
Approved by:	The Board of Governors July 2025