

Bullying & Harassment Policy



Bullying & Harassment Policy

Purpose and context

Our vision is to have a profound impact on the way the world does business and the way business impacts the world by shaping a collaborative, diverse and inclusive community where talented people grow and realise their potential.

The School is committed to treating all members of its community fairly and believes everyone has the right to be treated with dignity and respect. The School has a legal obligation to protect individuals and does not permit or condone any form of bullying or harassment and adopts a zero-tolerance approach.

The purpose of this policy is to stop unwanted, unreasonable or offensive behaviour, to protect our community, and to enable them if necessary, to make a complaint or assist in an investigation without fear of reprisal. We will provide guidance to resolve any problems should they occur and prevent reoccurrences of unacceptable behaviour. Where appropriate, efforts will be made to resolve issues informally. This policy also aims to support an environment where no one is treated less favourably than any other person or group of persons on the ground of the protected characteristics outlined in the Equality Act 2010. For more information on definitions of harassment and bullying, protected characteristics and the Equality Act, see our Belong and Thrive Policy.

Any incidents of harassment, bullying, victimization, coercion or abusive behaviour will be regarded extremely seriously and can be grounds for disciplinary action, which may include formal verbal or written warnings, suspension, dismissal or expulsion. Members of the School community are encouraged to report any incidents of bullying or harassment that they experience or witness. The School will ensure that complainants, the individual complained against and witnesses will not be victimised or suffer any detriment.

If an individual feels that they have experienced or witnessed harassment or bullying they may choose to deal with the problem informally or formally. Wherever appropriate and depending upon the seriousness of the behaviour, the School encourages individuals to attempt to resolve complaints informally; however, the choice as to whether to raise a concern informally or formally rests with the individual. Additionally, an individual who raises a complaint informally may choose to move to the formal procedure at any time.

Driving inclusion and belonging

LBS is an equal opportunities organisation, and no individual will be discriminated against for any protected characteristic in accordance with the Equality Act 2010. We value all experiences, backgrounds, and differences and strive to create an environment where all can belong and thrive within the framework of the school's behaviours and policies. More information can be found in our Belong & Thrive Statement.

Scope

This policy applies to current staff, faculty, students, participants and guests of our School (this includes affiliate faculty, contributors and speakers). This policy also applies to alumni when they are interacting with members of LBS staff, faculty or students; or when alumni are interacting with one another at LBS-run events or on LBS premises or when via the School's platforms.

This policy does not form part of your contract of employment and may be amended by LBS at any time.

Roles, accountability and responsibility

Collective responsibility

All individuals have a responsibility to be respectful towards others and have an obligation to act if they experience or observe unacceptable standards of behaviour. Ignoring harassment or bullying can give the appearance of condoning unacceptable behaviour, and as such, contravenes our aim to uphold the dignity of all within the School.

Bullying and harassment are harmful to all and affects an individual's psychological and physical wellbeing, as well as the School's overall effectiveness. Work, study and personal lives may suffer, and illness, accidents, absenteeism, poor performance and poor retention levels are common outcomes of unacceptable behaviour. No individual is expected to tolerate harassment or bullying, and everyone has a responsibility to ensure that they do not behave in a way that could be offensive.

Individuals may not realise that their behaviour is causing offence and individuals who experience or observe what they consider to be unacceptable standards of behaviour have an obligation to act. The School therefore asks all individuals to address any concerns as detailed in this policy.

Management Board and Diversity, Inclusion and Belonging Advisory Board Accountability

Overall accountability for the School's Diversity, Inclusion and Belonging strategy and any resulting activities rests with the Management Board. The Diversity, Inclusion and Belonging Advisory Board has delegated accountability to ensure the appropriate implementation of this code of practice.

Chief People Officer and Director, Research and Faculty Office Responsibility

The Chief People Officer and the Director, Research and Faculty are jointly responsible for leading on the development and monitoring of this policy and for recommending

changes to the Diversity, Inclusion and Belonging Advisory Board that reflect best practice and legal requirements. This will include:

- consultation with relevant committees including Staff Committee
- ensuring that support is available to employees who need help
- advising members of the School on all aspects of the policy and ensuring that the appropriate training is provided
- selecting appropriate individuals for conducting formal investigations and ensuring clear guidance and training is provided for them
- monitoring the effectiveness of the code of practice including the provision of relevant information

Director, PhD Programmes and Associate Dean, Degree Education and Career Centre

Responsibility for the monitoring and day-to-day implementation of the policy regarding students on the programmes for which they are responsible rests with the Associate Dean, Degree Programmes, the Director, PhD Programme and the Programme Offices who are the focus for student interaction. The policy will be implemented in accordance with the appropriate statutory requirements covering students. The Deputy Dean (Programmes) has a responsibility for monitoring and day to day implementation of the policy in relation to any relevant cross programme activities.

Role of the Student Association, London Business School

All students have a responsibility to be aware of their own behaviour within the School. The School's Student Association is expected to help communicate the principles of this policy and provide feedback on its development and implementation from students to the Diversity, Inclusion and Belonging Advisory Board.

Role of Line Managers/Heads of Department/Subject Area Chairs/Programme Office

The Role of Line Managers, Heads of Departments and Subject Area Chairs and Managers have a responsibility to be aware of their own and their teams' behaviour and to ensure that the working environment is free from a culture where harassment or bullying can develop. Managers should always be sensitive to the concerns of members of their areas/departments/teams and consider as a matter of priority any complaints that are raised informally. For Faculty, formal complaints must be shared with RFO who are responsible for case management and investigation.

Reporting procedure

Principles and Assurances

If an individual has been subjected to or has witnessed harassment or bullying, they will have the choice to resolve the matter informally or formally. This procedure is available when discrimination, bullying and harassment are the only concern. However, in some circumstances other School procedures may also be relevant and will be used where appropriate for example the Student Complaints Policy. The overriding objective of the informal and formal complaints procedures are to resolve the situation and to prevent a repetition of the behaviour (if the complaint is upheld). All complaints will be taken seriously and progressed with the utmost discretion and confidentiality. Great care will be taken to protect the interests of both the complainant and the individual complained against.

The complainant has the choice to discuss their complaint informally with the relevant person such as a people manager, department head, Subject Area Chair, Director of Alumni Engagement, Programme Office, Class Representative or Student Advocacy Officer.

However, it is recognised that an individual may not wish to discuss their complaint with the roles outlined above. The individual may therefore choose informally to raise their concerns with one of the sources of support set out below in appendix 1. In some situations, particularly relating to sexual or racial harassment or bullying, an individual may prefer to discuss their concern with someone who is of the same characteristic. Individuals will therefore wherever possible be given this option.

Where a formal complaint is upheld consideration will be given to invoking the relevant disciplinary procedure against the individual who has been complained against (either staff, faculty, participant, student or alumni). Depending upon the seriousness of the behaviour disciplinary action including, where appropriate, dismissal will be considered.

Where false allegations are made and can be proven, consideration will be given to invoking the relevant disciplinary procedure against the complainant. Depending upon the seriousness of the behaviour, disciplinary action and, where appropriate, dismissal will be considered. For students, this could mean suspension from their studies or expulsion from the School, and for alumni this could mean the withdrawal of alumni services and benefits, either temporarily or permanently.

Whether a complaint is made informally or formally, it is important that it is made as soon as possible after the incident(s) that have given cause for concern. Additionally, individuals are strongly advised to keep a written record of incident(s) which should include the following information:

- Time
- Date

- Place
- A description of the incident(s)
- The name(s) of the person(s) involved and any witnesses.

The reason it is important to raise the concern as soon as possible it will help enable the investigation process to be conducted in a fair and timely manner whilst events are still fresh in individuals' minds.

Complaints may be received where there is an ongoing investigation under another policy, for example, where a student makes a formal complaint against an employee whilst that student's conduct or behaviour is being considered in accordance with the Student Disciplinary Policy or Student Complaints Policy. In these circumstances, advice will be sought from the relevant Associate Dean, Degree Education or the Director, PhD Programme as to the most appropriate way in which to investigate the allegations of harassment or bullying that have been made.

If a complaint is made against an Associate Dean, Degree Programmes then advice will be sought from the Deputy Dean (Programmes) as to the most appropriate way to handle the allegations made. If a complaint is made against the Director, PhD Programme then advice will be sought from the Deputy Dean, Faculty or the Director, Research and Faculty Office. If a complaint is made against any of those cited as being responsible for managing a complaint, then the matter should be brought to the attention of the person to whom that individual reports.

The School makes the commitment to monitor occurrences of bullying and harassment across the community and will take appropriate action when there is a pattern of behaviour that is evident.

Informal Action

If the complainant chooses the informal action path this can be enough to stop unacceptable behaviour, particularly if the individual challenged is unaware that the behaviour was causing offence. As an initial step the individual is encouraged to seek guidance from:

- Staff: line manager, People Team or Head of Department
- Faculty: Subject Area Chair or RFO
- Students and Participants: Programme Office
- Alumni: Director, Alumni Engagement
- All: mentor or colleague/fellow student

Where the concern relates to an individual's Head of Department/Subject Area Chair then they should first seek advice from the Chief People Officer or the Director, Research and Faculty Office. Alternatively, advice may be sought from a member of the People Team or RFO Faculty HR Team. If the individual is a student the Associate Dean, Degree Programmes or Director, PhD Programme.

The line manager, Subject Area Chair, Associate Dean, Degree Programmes, Director, PhD Programme or Head of Department may, with the consent of the individual making the complaint, speak informally to the person(s) causing offence, and point out that the behaviour is unwelcome, offensive, and that the individual wishes it to stop. The individual who has received the informal complaint will also seek consent from the complainant to inform the appropriate managers of the complaint:

- Staff: Chief People Officer
- Faculty: Director, Research and Faculty Office & Deputy Dean, Faculty
- Students: Associate Dean, Degree Education & Career Centre
- PhD Students: Director, PhD Programme
- Alumni: Associate Dean of Advancement, or Director of Alumni Engagement
- Participants: Associate Dean, Executive Education
- Other: School Secretary to determine who is most relevant e.g. RFO for affiliate faculty

Formal Action

If the harassment or bullying continues or an individual feels they wish to make a formal named complaint, this should be put in writing to the appropriate manager or may be made via the Safe Reporting Hub and will be redirected as appropriate. The appropriate managers are:

- Staff: Chief People Officer
- Faculty: Director, Research and Faculty Office & Deputy Dean, Faculty
- Students: Associate Dean, Degree Education & Career Centre
- PhD Students: Director, PhD Programme
- Alumni: Associate Dean of Advancement, or Director of Alumni Engagement
- Participants: Associate Dean, Executive Education
- Other: School Secretary to determine who is most relevant e.g. RFO for affiliate faculty

If the harassment or bullying continues or an individual feels that they wish to make a formal named complaint, a written complaint should be made and submitted to Safe Reporting Hub and the complaint will be redirected to an appropriate manager (listed above).

If an individual chooses to remain anonymous, please refer to the Safe Reporting Policy.

The written complaint should state:

- The background, history and reason for the concern
- Names, dates, places and other relevant information
- Any documents that may support your report
- Any previous action taken to address misconduct where known

Investigation

If a formal complaint is made, the Safe Reporting Hub will direct the complaint to an appropriate leadership representative outlined above who will appoint an Investigation Team who will investigate the complaint in line with the relevant and appropriate policies. The purpose of the investigation will be to establish all the available facts surrounding the complaint and to decide what appropriate action is required. The depth and scope of the investigation will depend on the nature of the complaint.

All investigations will be independent and objective, respecting the rights of both the complainant and the individual complained of, to be appropriately heard and represented.

If requested or if considered necessary by the Investigation Team, they will consider in consultation, as appropriate, with the Head of Department/Subject Area Chair/Director of Programmes, whether immediate temporary action may be appropriate in order to minimise contact between the complainant and the person(s) against whom the allegations are made.

The Investigation Team will interview the person against whom the allegations are made, as well as any witnesses. The Investigation Team will advise the alleged perpetrator of the nature of the complaint in writing, prior to the interview. If an individual would prefer to share an anonymous complaint, please refer to the Safe Reporting Policy.

Once the investigation is complete, the Investigation Team will produce a report setting out their findings as per the relevant policy. The steps of the relevant policy will then be followed until the outcome of the process is clear and any necessary steps have been taken such as a grievance and disciplinary hearing where appropriate.

Potential outcomes may include: take no further action, initiate resolution of the issues through training or other intervention, consider within the Disciplinary Process or consider Mediation-please refer to Mediation section below.

Mediation

As an alternative to taking formal action, or at any stage during formal action, the complainant may request that the matter be resolved through mediation. Mediation is voluntary and can only take place with the agreement of all parties concerned.

If it is agreed to adopt mediation when formal action has already commenced, the formal action will be adjourned whilst the mediation takes place. If no agreement or compromise is reached, formal action will continue from the point of adjournment.

A trained mediator appointed from an external mediation organisation will conduct the mediation. This will ensure that the mediation will be independent and neutral to the

dispute. The role of the mediator will be to help the parties in dispute towards a mutually acceptable agreement. If the complaint is resolved through mediation, the mediator will assist the parties to draft a written agreement that will be signed by both parties as acceptance of its terms.

Learning and development

The School will ensure that faculty, staff and students receive the relevant training to increase their awareness of bullying and harassment and unacceptable behaviour and how to prevent unacceptable behaviour, along with providing clear routes for reporting such behaviour. In particular, the training will seek to ensure that those with managerial responsibilities fully understand what is expected of them within this policy. The School will also ensure that those with designated responsibilities for operating procedures within the policy will receive specialist skills training as necessary.

Alternative procedures

This policy is aimed at incidents of bullying and harassment and to encourage a more tolerant environment. However, the School appreciates that bullying and harassment can occur in conjunction with other issues and that more than one procedure may be relevant or applicable in certain circumstances. In this situation, the School reserves the right to determine which School procedure should be used or if a modified procedure would be appropriate. Both parties will be informed in advance of any formal stage of which School procedure (or modified procedure) the School should follow.

Complaints against third parties

Sometimes the allegation of bullying or harassment may be against someone an employee comes across as part of their work e.g. a customer, supplier or visitor. In this case the complaint should be made to the relevant senior leadership representative, who will then discuss with the employee how best to deal with the situation.

Monitoring and reviewing

This policy will be reviewed every two years by the People Team and RFO.

Appendix 1: support

Various forms of internal and external help and support is available to anyone affected by the situations described in this policy. These are as follows:

Confidential Advisors

The School has trained a team of Confidential Advisors from across the School who can provide informal, impartial support for anyone who feels affected by bullying and harassment. Confidential Advisors are available to anyone concerned: those affected by, as well as those accused of, harassment and bullying. The service offers an opportunity for an individual to be listened to in a safe, impartial, confidential environment without the fear of being judged or blamed.

Confidential Advisors have an in-depth knowledge of processes and procedures to help individuals explore possible options - both internal and external - of how to take things forward. These could include informal routes, such as mediation or counselling, or formal procedures via the People Team or the Research and Faculty Office.

Advisors from all areas of the School have completed comprehensive training to enable them to carry out this important role. Should you wish to speak to a trained Confidential Advisor, to discuss issues relating to bullying and harassment on an informal basis, please contact one of the Advisors who are listed on Portal. You may contact any Advisor, irrespective of the department that you or they may be in.

Students

Students can approach the Student Associate's Advocacy Officer for informal support. Students can discuss their concerns in complete confidence with the Student Support Counsellor.

Employee Assistance Programme

The School offers a free and confidential counselling service to employees wishing to discuss any personal or work related issues that may be affecting them. Support can be provided via the School's 24/7 Employee Assistance Programme to support staff. Counselling & Information Line - 0800 111 6387 or accessed through: www.my-eap.com. Access code: lswell

Occupational Health

Employees who are experiencing stress or exhibiting any other mental health related symptoms affecting their work as a result of any situation described in this procedure can be referred to the School's Occupational Health service, through the People Team or RFO.