

Bullying and Harassment (including Sexual Harassment)

Policy

Introduction

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 and diverse community where talented people grow and realise their potential.

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 and relevant UAE law (including but not limited to Dubai International Financial Centre (DIFC) Law No. 2 of 2019, as amended by the “DIFC Employment Law”). We value all experiences, backgrounds, and differences and strive to create an environment where all can belong and thrive. Expectations regarding behaviours are set out within School policies.

Purpose

The purpose of this policy is to:

- Increase understanding: clearly explain the School's position on relevant behaviour and prohibited conduct
- Describe how to report bullying and Harassment: outline how to report through the School's mechanisms, whether informal or formal
- Outline how reports will be managed: describe the process followed once a report has been made
- Outline potential consequences: describe the consequences that may occur due to a breach of this policy
- Communicate LBS responsibilities: describe the responsibilities of the community

This document will be reviewed at regular intervals, and its effectiveness monitored.

Scope

This policy applies to everyone within the LBS community, including third parties. This policy applies in respect of conduct on campus, during situations relating to work or study and interactions with people connected to the School off-campus (including social events with colleagues or fellow members of the LBS community or online, including on social media). Where conduct outside a work or study situation is relevant to work, study or otherwise being part of the School community, this policy will also apply.

As a School, we recognise that discussion and exchange of views is a fundamental tenet of higher education. In line with its purpose and the principles relating to academic freedom set out in its Charter and Statutes, the School is committed to creating a learning and working environment in which all members of the School community are free within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions.

In implementing this policy, the rights of any individual to express their own protected religious or philosophical beliefs in a particular way will only be challenged to the extent necessary to enable the School to discharge its legal obligations to protect the rights and freedoms of others.

Understanding bullying and harassment

The Bullying and harassment (including sexual harassment) are unlawful and LBS takes these matters very seriously. Please see the Appendix for relevant definitions (e.g. what is harassment) and a list of prohibited behaviours.

Any member of the LBS community who experiences or witnesses bullying or harassment (including sexual harassment) is encouraged to report the incident promptly. Individuals will not face victimisation or detriment for coming forward. Acts of retaliation against individuals who have reported bullying or harassment (including sexual harassment) will not be tolerated.

How to report bullying and harassment and seek support

All individuals within the LBS community should be aware of the reporting mechanisms available to them when considering conduct that goes against this policy, including bullying and harassment (including sexual harassment). Whether reported informally or formally, anonymously or named, it is important that issues of misconduct are raised with the School.

Sometimes an allegation of bullying or harassment (including sexual harassment) may be made against someone who is considered to be a third party to the School (e.g. a customer, supplier or visitor). Bullying and harassment (including sexual harassment) by third parties will not be tolerated by the School. The School complies with its legal duty to take reasonable steps to prevent bullying and harassment of its workers in the course of their work for the School, including by third parties.

While individuals cannot usually bring claims against the School solely based on harassment by third parties, third party harassment can still potentially result in legal liability for the School, e.g. when raised in other types of claim. All members of the School community are encouraged to report any cases of bullying or harassment (including sexual harassment) by third parties through the reporting procedures below.

An individual who wishes to make a report can choose whether to report formally or informally:

- **Informal:** resolving the issue without a formal procedure like the grievance procedure will often mean an issue is resolved more quickly. You can make an informal report using the appropriate internal route specified below. If you make an informal report initially you can make the matter formal at a later stage if you wish to do so.
- **Formal:** if the report falls within the scope of the School's policies, an investigation will take place under the relevant formal procedure. It is appropriate for serious cases to be dealt with formally, and the School may sometimes suggest that a serious complaint which is raised informally be dealt with under a formal procedure.

Individuals can further choose to report internally or externally. The table below shows how and who to make a report to. The external reporting route is available via the Safe Reporting Hub (see below for details).

| Group | Internal route and support | External route |
|--|---|---|
| Students | Programme Team Student Advocacy Officer | Safe Reporting Hub: named, semi-anonymously, or anonymously (further details below) |
| Staff | People Manager People team: Peoplehelp@london.edu | |
| Faculty | Subject Area Chair Faculty HR: facultyhr@london.edu | |
| Other (e.g. third parties including workers who are not employees, affiliate faculty and contractors) | Dean's Office: safereporting@london.edu LBS point of contact (e.g. Programme Manager or Faculty member) | |

Safe Reporting Hub

The Safe Reporting Hub is the external route for reporting concerns. The Hub is run by Safecall, an independent third party, and is available 24/7, 365 days a year. There are two ways to submit a report:

- phoning (free of charge): 0800 915 1571
- completing a web form: www.safecall.co.uk/report

If an individual chooses to use the Hub, they have three options for how to report:

- **Named:** they agree that their identity can be passed by Safecall to the School; their identity will be kept confidential by the individuals at the School who are handling the report and, unless the individual making the report agrees that it may be shared more widely for the purposes of facilitating appropriate investigation and any subsequent action, it will only be known by individuals at the School who are handling the report (subject to any legal obligation to share with external agencies such as the police).
- **Semi anonymous:** they agree to provide their identity to Safecall but they do not want this passed to the School. Safecall may contact you using the details you have provided. The School's ability to investigate and respond in these circumstances may be limited, and the individual reporting must be aware of the impact this may have on progress of the issue/s of concern.
- **Anonymous:** they do not want to provide their identity to Safecall or the School. The School's ability to investigate and respond in these circumstances may be limited, and the individual reporting must be aware of the impact this may have on progress of the issue/s of concern.

Individuals who are identified in the report may be asked to provide a statement as part of any investigation. If the School considers that this may lead to the reporter's identification by these individuals, they will be asked in advance whether they consent to this step being taken.

Internal and external sources of support and advice

Confidential Advisors for faculty and staff: The School has trained a team of confidential advisors from across the institution (both faculty and staff) who can act as an informal, impartial point of contact for anyone who feels affected by bullying and harassment: both those affected by as well as those accused of harassment and bullying. The confidential advisors offer 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 and can help individuals explore possible options – both internal and external – of how to take things forward. Information can be found on the Hub.

Wellbeing Services for students: The School has a team of individuals who provide support across a variety of concerns. Students can email wellbeing@london.edu or visit the [website](#) to find more information.

Equality Advisory and Support Service Helpline: this helpline advises and assists individuals on issues relation to equality and human rights:

- Freephone Telephone 0808 800 0082
- [Link to email reporting form](#)

Protect Helpline: this is a helpline run by Protect, the whistleblowing charity:

- Telephone 020 3117 2520
- [Link to email reporting form](#)

Report management

Following a report, a specific policy will be triggered, and the procedural steps followed will depend on who the alleged perpetrator is.

| Alleged perpetrator | Policy triggered | Purpose of the policy |
|---------------------|--|--|
| Faculty | Faculty Grievance Policy in the Human Resources Policy (HRP) | If there is a complaint by a member of faculty of bullying or harassment (including sexual harassment), this will be investigated under the grievance policy in the HRP. |
| | Faculty Disciplinary Policy in the HRP | If there is a complaint against a member of faculty which results in a disciplinary process, this process will also be conducted under the disciplinary policy for faculty in the HRP. |
| Staff | Staff Grievance Policy | If there is a complaint by a member of staff of bullying or harassment (including sexual harassment) made against staff will be dealt with under the Staff Grievance Policy. |
| | Staff Disciplinary Policy | If there is a complaint against a member of staff which results in a disciplinary process, this process will be conducted under the Staff Disciplinary Policy. |

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|---------|----------------------------------|--|
| Student | Student Complaints Policy | If there is a complaint by a student of bullying or harassment (including sexual harassment) will be dealt with under the Student Complaints Policy. |
| | Student Disciplinary Policy | If there is a complaint against a student which results in a disciplinary process, this process will be conducted under the Student Disciplinary Policy. |
| Alumni | Alumni Community Code of Conduct | If there is a complaint against an alum, the alumni Code of Conduct would be invoked. |

If a complaint is made by, or against, someone who does not fall within the scope of any of these policies, an appropriate process will be followed, taking into account the nature of the complaint.

If there is more than one alleged perpetrator, and they are part of different areas of the School (e.g., one staff member and one faculty member), then representatives from those areas of the School will first meet to discuss how to manage the complaint. Then they will proceed by triggering one of the policies listed above.

Case management

Consequences for those who are found to have engaged in bullying or harassment (including sexual harassment), or in victimisation of complainants or witnesses, may include disciplinary action up to and including dismissal/expulsion. This is true for all groups within the School (students, staff, faculty). Aggravating factors, such as abuse of power over a student or a more junior colleague, will be taken into account in deciding what disciplinary action to take.

Where a complaint against a third party is upheld, relevant individuals within the School will consider what steps to take to remedy the complaint and prevent such behaviour from occurring again, for example warning the third party about their behaviour, banning a third party from some or all aspects of School life, reporting any criminal acts to the police or sharing information with other parts of the School.

LBS roles and responsibilities

- **Collective responsibility:** All individuals have the responsibility to be respectful towards others and are strongly encouraged to act if they experience or observe unacceptable standards of behaviour, and as such contravenes our aim to uphold the dignity of all within the School community.

- **Management Board:** Management Board holds overall accountability for diversity, inclusion, and belonging initiatives. The Diversity, Inclusion and Belonging Advisory Board has delegated responsibility to ensure the appropriate implementation of this policy.
- **Chief People Officer and Director, Research and Faculty Office Responsibility:** These individuals are responsible for leading the development, monitoring, and enforcement of the policy. They provide support, guidance, training and oversee investigations into formal complaints.
- **Director, PhD Programme and Executive Director, Programme and Student Experience:** Responsible for the day-to-day implementation of the policy regarding students and ensuring compliance with statutory requirements.
- **Student Association:** The Student Association plays a vital role in communicating the principles of this policy to students and providing feedback on its development and implementation.
- **People Managers/Heads of Department/Subject Area Chairs/Programme Teams:** These individuals are responsible for fostering a culture free from harassment or bullying within their respective areas. They must address complaints promptly and sensitively and ensure a supportive working environment for all.
- **LBS point of contact:** If an individual is contacted as a third parties' point of contact, this individual has the responsibility to contact the Dean's Office who will triage the issue and determine who will manage the report.

Appendix

Definitions

This is not an exhaustive list and depends on the situation, and definitions may interact with one another.

The below definitions have been taken from law, or are acknowledged by leading sources that include, but are not limited to the following International Holocaust Remembrance Alliance, Equality and Human Rights Commission, ACAS, Stonewall, GIRES, ILGA Europe. The School has chosen the most appropriate definitions for our organisation regarding diversity, inclusion and belonging.

Wider definitions relating to the Equality Act 2010:

- **Discrimination by association:** This means treating someone less favourably than another person because they are associated with a person who has a protected characteristic.
- **Discrimination by perception:** This means treating one person less favourably than someone else, because you think (correctly or incorrectly) that they have a protected characteristic.
- **Direct discrimination:** This means treating someone less favourably than someone else because of a protected characteristic.
- **Harassment:** This is unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics: age; disability; gender reassignment; race; religion or belief; sex; and sexual orientation. A separate definition of sexual harassment is provided in the section below.
- **Indirect discrimination:** This is when a policy which applies in the same way for everybody has an effect which particularly disadvantages people with a protected characteristic (or people who suffer the same disadvantage as those who have that particular protected characteristic). Where a particular group is disadvantaged in this way, a person in that group is indirectly discriminated against if an individual is put at that disadvantage, unless the person applying the policy can justify it.
- **Positive action:** In certain limited circumstances, the Equality Act 2010 permits employers to take measures designed to redress imbalances and counteract the effects of past discrimination. This is known in the law as 'positive action' and is

designed to ensure that people from previously underrepresented groups can compete on equal terms with others.

- **Protected characteristic:** under the Equality Act 2010, it is against the law to discriminate against someone because of the following protected characteristics: age, disability, gender reassignment (or transitioning), marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- **Reasonable adjustments:** The adaptations that can reasonably be made in the workplace or learning environment to prevent a disabled person from being placed at a disadvantage. These can include specialist equipment, a change to the hours or location of work or a reallocation of duties. The 'reasonable' test involves consideration of several factors such as cost, impact on other team members or students, and the extent of the disadvantage which would otherwise be experienced.
- **Victimisation:** This is treating someone unfavourably because they have taken some form of action relating to the Equality Act, e.g. made a complaint under the Act or supported somebody who is doing so, such as appearing as a witness. Unfavourable treatment for rejecting or submitting to sexual harassment will be treated in the same way as victimisation and/or may be considered to be an aggravating factor in determining the appropriate sanction where a complaint of sexual harassment is upheld.

Prohibited behaviours

The below behaviours are prohibited by the School in any mode, including physical, verbal, online, on social media, written, psychological, financial, organisational, and emotional. Online prohibited behaviour will be treated in the same way as offline prohibited behaviour.

Abuse: Treat with cruelty or violence, especially regularly or repeatedly. Any action that intentionally harms or injures another person including verbal. Examples might include, but is not limited: inappropriate gestures, indecent comments, derogatory remarks, withholding care/ support/ resources from someone else with the intention of causing harm, image based abuse - sharing intimate or sexual photos or videos without consent, targeted /persistent personal attacks, encouraging vulnerable people to self-harm and/or complete suicide, sending /posting obscene pictures, stalking a person online and hacking into social media accounts, along with emails

Antisemitism: The School has adopted the International Holocaust Remembrance Alliance working definition of antisemitism:

'Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.'

Manifestations might include the targeting of the state of Israel, conceived as a Jewish collectivity. However, criticism of Israel similar to that leveled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for "why things go wrong." It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.

Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

- Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective - such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).
- Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
- Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
- Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
- Applying double standards by requiring of it a behaviour not expected or demanded of any other democratic nation.
- Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
- Drawing comparisons of contemporary Israeli policy to that of the Nazis.
- Holding Jews collectively responsible for actions of the state of Israel.

Antisemitic acts are criminal when they are so defined by law (for example, denial of the Holocaust or distribution of antisemitic materials in some countries).

Criminal acts are antisemitic when the targets of attacks, whether they are people or property - such as buildings, schools, places of worship and cemeteries- are selected because they are, or are perceived to be, Jewish or linked to Jews.

Antisemitic discrimination is the denial to Jews of opportunities or services available to others and is illegal in many countries.

This definition of Antisemitism is adopted by LBS subject to the following further clarification points, the first two of which were recommended by the [Home Affairs Select Committee in 2016](#):

- It is not antisemitic to criticise the government of Israel, without additional evidence to suggest antisemitic intent.
- It is not antisemitic to hold the Israeli government to the same standards as other liberal democracies, or to take a particular interest in the Israeli government's policies or actions, without additional evidence to suggest antisemitic intent.
- It is not antisemitic to propose alternative concepts of statehood (for instance proposals of shared statehood or challenging the concept and value of "statehood") without additional evidence to suggest antisemitic intent.

Biphobia: As defined by ILGA Europe, the fear, unreasonable anger, intolerance or/and hatred toward bisexuality and bisexual people.

Bullying is unwanted behaviour, which is intimidating, humiliating, offensive, malicious or insulting. It may involve an abuse or misuse of power.

Examples of bullying could include spreading a false rumour about someone, microaggressions, putting someone down in meetings, giving someone a heavier workload than everyone else, excluding someone from team social events.

It's possible someone might not know their behaviour is bullying. It can still be bullying even if they do not realise it, or do not intend to bully someone. Sometimes bullying is classed as harassment, which is against the law.

Harassment: as defined by the OfS:

They follow the meaning given to harassment in:

- section 26 of the Equality Act 2010
- section 1 of the Protection from Harassment Act 1997

They have summarised section 26 of the Equality Act 2010 as follows:

'harassment, including sexual harassment, includes unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics: age; disability; gender reassignment; race; religion or belief; sex; and sexual orientation.'

They have summarised section 1 of the Protection from Harassment Act 1997 as follows:

'a course of conduct conducted on at least two occasions that harasses one other person, or a course of conduct that harasses two or more persons at least once each. References to harassing a person include alarming the person or causing the person distress.'

They have also extended these definitions to include harassment of one student by another student.

These definitions include tests that are designed to establish, objectively and reasonably, whether conduct could be considered as 'harassment'.

This means as a School we should take into account:

- the perception of the person who is at the receiving end of the conduct
- the other circumstances of the case
- whether it is reasonable for the conduct to have the effect under scrutiny.

Under section 1 of the Protection from Harassment Act 1997, an offence is committed only if:

- the person knows the conduct amounts to harassment of the other, or
- a reasonable person in possession of the same information would think the course of conduct amounted to harassment of the other person.

Hate crimes/incidents: As defined by EHRC, hate crimes are any crimes that are targeted at a person because of hostility or prejudice towards that person's: disability, race or ethnicity, religion or belief, sexual orientation, or transgender identity. This can be committed against a person or property. A victim does not have to be a member of the group at which the hostility is targeted. In fact, anyone could be a victim of a hate crime.

Homophobia: As defined by Stonewall, the fear or dislike of someone, based on prejudice or negative attitudes, beliefs or views about lesbian, gay or bi people. Homophobic bullying may be targeted at people who are, or who are perceived to be, lesbian, gay or bi.

Islamophobia: The School has adopted the All-Party Parliamentary Group (APPG) on British Muslim's definition of Islamophobia:

"Islamophobia is rooted in racism and is a type of racism that targets expressions of Muslimness or perceived Muslimness."

The APPG definition is supplemented by a list of contemporary examples that include but are not limited to:

- Calling for, aiding, instigating or justifying the killing or harming of Muslims in the name of a racist/ fascist ideology, or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Muslims as such, or of Muslims as a collective group, such as, especially but not exclusively, conspiracies about Muslim entryism in politics, government or other societal institutions; the myth of Muslim identity having a unique propensity for terrorism, and claims of a demographic 'threat' posed by Muslims or of a 'Muslim takeover'.
- Accusing Muslims as a group of being responsible for real or imagined wrongdoing committed by a single Muslim person or group of Muslim individuals, or even for acts committed by non-Muslims.
- Accusing Muslims as a group, or Muslim majority states, of inventing or exaggerating Islamophobia, ethnic cleansing or genocide perpetrated against Muslims.
- Accusing Muslim citizens of being more loyal to the 'Ummah' (transnational Muslim community) or to their countries of origin, or to the alleged priorities of Muslims worldwide, than to the interests of their own nations.
- Denying Muslim populations the right to self-determination e.g., by claiming that the existence of an independent Palestine or Kashmir is a terrorist endeavour.
- Applying double standards by requiring of Muslims behaviours that are not expected or demanded of any other groups in society, e.g. loyalty tests.
- Using the symbols and images associated with classic Islamophobia (e.g. claims of Muslims spreading Islam by the sword or subjugating "Islamophobia is rooted in racism and is a type of racism that targets expressions of Muslimness or perceived Muslimness." minority groups under their rule) to characterize Muslims as being 'sex groomers', inherently violent or incapable of living harmoniously in plural societies.

- Holding Muslims collectively responsible for the actions of any Muslim majority state, whether secular or constitutionally Islamic.

We recognise that the APPG definition has been criticised, for example on the basis that Islamophobia is not rooted in racism (Muslims come from many ethnic backgrounds) but related to faith. The Government has established a working group to deliver a definition of Anti-Muslim Hatred/Islamophobia (expected by around August 2025). The School's definition will be reviewed at that time.

Racial harassment: Harassment based on race, including nationality or ethnicity: see 'harassment'.

Sexual harassment: Sexual harassment is defined in the Equality Act 2010 as unwanted conduct of a sexual nature, which has the purpose or effect of either: (a) violating the complainant's dignity; or (b) creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples of sexual harassment include:

- making sexual remarks about someone's body, clothing or appearance;
- asking questions about someone's sex life;
- telling sexually offensive jokes;
- making sexual comments or jokes about someone's sexual orientation or gender reassignment;
- displaying or sharing pornographic or sexual images, or other sexual content;
- touching someone against their will, for example hugging them;
- sexual assault or rape.

The law requires employers to take reasonable steps to prevent sexual harassment of their workers, including by third parties. Separate duties exist in relation to students.

Sexual misconduct: As defined by Office for Students, the unwanted or attempted unwanted conduct of a sexual nature. This includes, but is not limited to sexual harassment, sexual assault; and rape.

Transphobia: As defined by ILGA Europe, refers to negative cultural and personal beliefs, opinions, attitudes, and behaviours based on prejudice, disgust, fear and/or hatred of trans people or against variations of gender identity and gender expression.

This is not an exhaustive list of definitions and will be reviewed in line with the monitoring and reviewing of this document.