

Safe
Reporting
Policy



Safe Reporting 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 purpose of this policy is to provide a framework so that individuals within our community understand how they can report issues, what type of issues they should report, how the School will use this information, the support the individual can expect from the School and information about other related policies and procedures. This policy also introduces our Safe Reporting Hub which is external to the School and allows for anonymous reporting.

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 staff, faculty, students, alumni, participants and guests of our School (this includes affiliate faculty, contributors and speakers). This policy is also available to external parties with whom the School has or has had some type of business relationship (such as partners, suppliers and agents) who wish to raise possible issues within and about the School. The types of issues covered are outlined below; if you believe your issue is out of the scope of the policy please contact the Dean's Office (safereporting@london.edu). This policy is available for cross-School reporting, for example staff reporting issues with faculty, students reporting issues with staff and so on. This policy also is also relevant if an individual has witnessed an issue outlined below. 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.

Policies relating to this policy are:

- **Bullying and Harassment Policy:** this policy applies to staff, students, faculty and participants. Its aim is to stop unwanted, unreasonable or offensive behaviour, protecting all employees and students, and to enable them if necessary, to make a complaint or assist in an investigation without fear of reprisal.
- **Staff Grievance Policy:** this policy applies to staff only. Grievances are official complaints by employees to LBS about action which LBS or a colleague has taken or proposes to take in relation to them.

- Faculty Grievance Procedure: this policy applies to faculty only. Members of faculty may sometimes have grievances relating to matters affecting themselves as individuals or affecting their personal dealings or relationships with other employees of the School.
- Student Complaints Procedure: this policy is available to students only.
- Whistleblowing Policy: this policy applies to faculty, staff, students, agency workers and self-employed workers, members of the governing body. This policy seeks to encourage and enable members of the School to raise concerns internally without fear of reprisal. When reporting an issue of suspected or alleged misconduct through the Whistleblowing Policy an individual will be directed to the Dean's Office, for anonymous reporting please see 'Safe Reporting Hub' below.

Internal and existing reporting processes

As a first step, the School encourages sharing an issue through our existing internal processes and policies outlined below. This includes if an individual has witnessed an issue.

Staff – step one

As a first step, we encourage affected staff to speak with their line manager. Staff can also contact the People Team via hrenquiries@london.edu. Your people manager, and the People Team will work with you to understand the most appropriate way to deal with any issues you raise and typically this will be in accordance with the Bullying and Harassment Policy and Staff Grievance Policy.

Faculty – step one

As a first step, we encourage faculty to speak with their Subject Area Chair. You can also contact the Research and Faculty Office via facultyhr@london.edu. Your Subject Area Chair and RFO will work with you in accordance with Bullying and Harassment Policy and Faculty Grievance Procedure. For faculty, formal reports must be shared with RFO who are responsible for case management and investigation.

Students – step one

As a first step, we encourage students to speak with their Programme Office. The team will work with you in accordance to the Bullying and Harassment Policy and Student Complaints Procedure.

The School's Whistleblowing Policy is relevant to all parties using the Safe Reporting Policy.

Safe Reporting Hub

For issues that are not covered by the above policies or where an individual does not feel comfortable using our existing internal policies and processes, we have introduced a Safe Reporting Hub, enhancing our safe reporting framework and to give individuals the choice to report anonymously.

Examples of suspected or alleged misconduct

Examples of suspected or alleged issues of misconduct that may be raised (definitions can be found here):

- That a criminal offence has been committed, is being committed or is likely to be committed;
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are a subject;
- That a miscarriage of justice has occurred, is occurring or is likely to occur
- That the health or safety of any individual has been, is being or is likely to be endangered;
- Experiences of harassment, bullying, coercion, abuse, discrimination or any prohibited behaviours outlined in this policy that you would like to report anonymously, including racial and sexual harassment/misconduct;
- That the environment has been, is being or is likely to be damaged; or
- That information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed;
- Failure to comply with a legal obligation;
- Serious failure to comply with the School's Charter and Statutes;
- Endangering of health and safety or damage to the environment;
- Criminal activity;
- Academic or professional malpractice;
- Improper conduct or unethical behaviour;
- Abuse of authority for illegal or unethical purposes;
- Serious conflict of interest without disclosure;
- Concerns regarding fundraising practice.

Examples of issues that should be raised under the policies outlined in our 'Internal and existing reporting processes' are:

- Alumni on alumni issues, for this please speak to the Advancement team
- Employment terms including personal pay and reward issues;
- Matters which should be raised under grievance, complaint, disciplinary, or other Faculty, staff, student and alumni procedures and policies, or to reopen matters which have already been considered under them – unless the complainant wishes to remain anonymous (see "How will my complaint be investigated if I remain anonymous")
- Matters of financial or business decisions relating to LBS;

- Settling personal disputes – unless the complainant wishes to remain anonymous (see “How will my complaint be investigated if I remain anonymous” below)
- Student issues relating to material matters e.g. text books, accommodation, food etc.

If you are unsure if your example is covered by this policy, please reach out to the Dean's Office (safereporting@london.edu).

Where you suspect misconduct and believe that the matter cannot be dealt with through the available channels set out above, you should use the Safe Reporting Hub. This gives you the opportunity to raise concerns anonymously. The reporting line 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 through the hub by:

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

After you complete your report (online or by phone), you will receive a unique username and password. You can use this username to log in to check progress on your report. You can check whether the person dealing with your report has feedback for you or further questions. If you want, you can provide additional information. Your username is particularly important if you choose to remain anonymous, as we can only contact you through the website in that case. All issues reported via the Safe Reporting Hub are forwarded to the Dean's Office for further handling (see below). If you are in a life-threatening and emergency situation, please call 999 instead of using the hub.

What kind of information do you need to provide?

When you report an issue please provide as much detailed information as you can to enable us to assess and investigate your issue, such as:

- the background, history and reason for the issue;
- names, dates, places and other relevant information;
- any documents that may support your report.

A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

What should you do if you do not have all the facts?

We encourage you to report an issue as soon as possible, ideally before a situation gets out of hand or damage is done. The School encourages individuals to make a report early rather than to wait for all the facts. If you know about or suspect misconduct, speak up with the facts you have. We do not expect you to have all the answers. Let the School investigate the matter to determine if there is a reason for concern. We recommend avoiding investigating the matter yourself and to not seek

evidence to build a strong case. No disciplinary action will be taken against a reporting person where the report is brought forward in good faith, without falsehood, or malice.

Will my identity be kept confidential? Can I be anonymous?

When reporting an issue, you have three options:

- **Named:** You agree that your identity can be passed by Safecall to LBS; your identity will be kept confidential and only known by individuals handling the report.
- **Semi Anonymous:** You agree to provide your identity to Safecall but you do not want this passed to the School. Safecall may contact you using the details you have provided.
- **Anonymous:** You do not want to provide your identity to Safecall or the School. If reporting anonymously, the process of investigation may be limited depending on the amount of information given, see 'What kind of information do I need to provide?'. As much information as possible enables the School to follow investigation procedures.

Individuals are encouraged to identify themselves where possible. In anonymous reports, depending on the issues brought forward, the School may investigate an anonymous report and corroborate the information through other sources. A report including the reporting person's identity, may be shared with external agencies if required to meet the School's legal obligations, for example, the Police. The individual may be requested to share a statement which may impact the level of confidentiality, but the individual can refuse to share their identity. For more information please refer to the SafeCall Privacy Notice on their website.

It's important to remember that the less information that is shared will impact the School's ability to investigate. The School will endeavour to investigate all issues and the level of an investigation is likely to depend on whether it is covered by this policy, the amount of evidence supplied, and whether the allegation can be confirmed through other sources.

After reporting

What happens once I've raised an issue?

If you share a named, anonymous or semi-anonymous report with Safecall, your report will be shared with the Dean's Office who will acknowledge and respond to your report within 2 working day (working days are Monday to Friday). Your report will then be shared with the appropriate manager:

- Staff: Chief People Officer
- Faculty: Director, Research and Faculty Office
- Students: Associate Dean, Degree Education & Career Centre
- PhD Students: Director, PhD Programme
- Alumni: Associate Dean, Advancement

- Participants: Associate Dean, Executive Education
- Other: School Secretary to determine which appropriate manager is most relevant e.g. Director, Research and Faculty Office for affiliate faculty

If the issue raised concerns a member of the management team outlined above, the report will be dealt with in accordance with the Staff Disciplinary Policy. If it concerns the School Secretary or the Dean, the report will be handled by the Chair of the Governing Body.

If an investigation should take place, an internal or external investigator will be assigned in accordance with the relevant policy (see 'How will a report be handled'). If an investigation is unable to take place, the complainant will be notified. If an investigation is conducted, you will not be informed of the outcome in full detail, or actions taken, because the School is required to ensure privacy, confidentiality, and the legal rights of all involved. Any request for information will be decided by the investigator and appropriate manager outlined above. If there is an outcome meriting further action, then appropriate action will be taken in line with the relevant policies, and in accordance with the law.

All reports and cases will be conducted in an unbiased, fair and independent manner to maintain the dignity and respect of all parties involved.

How will my complaint be investigated if I remain anonymous?

The involvement of the complainant is extremely important. We require you to answer questions honestly and engage with the case as much as necessary. Individuals are encouraged to identify themselves where possible. In anonymous reports, depending on the issues brought forward, the School may investigate and corroborate the information through other sources. If you have chosen to be anonymous this will impact the ability to gather evidence, but the School will endeavour to investigate as best we can with the information provided. If an individual chooses to remain anonymous, the Investigation team will use the Safecall system to communicate with the complainant.

Our aim is deal with any matter sensitively and with due respect for the privacy of any individuals involved. All individuals must treat, as confidential, any information communicated to them in connection with the matter. Disciplinary action may be invoked against those who are in breach of this requirement.

How will the issue be investigated?

The reports will be investigated in line with the policies outlined in 'Scope'.

Do you have a concern on how the report is handled?

If you have any concern about how a report has been handled, please write to the Dean's Office (safereporting@london.edu), if the issue relates to the Dean and you are a student,

please contact the [Office for Students](#). If the issue relates to the Dean and you are a staff or faculty member, please contact the Dean's Office (safereporting@london.edu). Reasons for raising points of concern include:

- Procedural irregularity
- Prejudice or bias

How will this policy be reviewed and monitored?

The Dean's Office is responsible for the oversight and completion of investigations that are as a result of a report using the Safe Reporting Hub and will monitor accordingly. A summary of reports and action taken will be shared with the Management Board, Governing Body, Diversity, Inclusion and Belonging Advisory Board on an annual basis and provided by the Dean's Office. The summary will share no personal information and is therefore anonymous even if it was a named report, it will include whether the report comes from staff, faculty or students, or external, it will include the type of alleged or suspected misconduct e.g. health and safety, timelines of the report, and whether the report is substantiated, partially substantiated or not substantiated. This policy will be reviewed annually by the Diversity, Inclusion and Belonging Advisory Board, as well as the Management Board for its effectiveness.