



Preventing of Harassment and Sexual Misconduct Policy

1. Purpose

- London School of Commerce & IT (LSCI) is committed to preventing incidents of harassment and/or sexual misconduct within the College in compliance with the Office for Students' (OfS) **Condition E6**.
- All members of LSCI are expected to take personal responsibility for their behaviour, to behave with integrity, to be aware of the impact on others and to provide a safe, inclusive and welcoming environment where people can be themselves.
- LSCI is committed to working with students, partnerships, and key internal and external groups to build positive relationships to support, prevent and proactively promote a culture where our expectations are transparent to the wider community and to our placement providers.
- LSCI recognises that harassment and sexual misconduct can occur in all areas of society, including higher education and can take many forms. Such incidents and behaviours are taken seriously and are not acceptable at LSCI.
- Preventing of Harassment and Sexual Misconduct Policy aims to raise awareness of harassment and/or sexual misconduct and enable students to recognise and provide ways to speak out about incidents or behaviours that may constitute harassment and/or sexual misconduct.
- This Policy sets out how the LSCI handles and supports disclosed information and reports of allegations of harassment and/or sexual misconduct conducted by students.
- This Policy should be read in conjunction with the Student Conduct Procedure.

2. Definitions

For the purposes of this policy:

Harassment means unwanted behaviour related to a relevant protected characteristic (as defined in the Equality Act 2010) that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual misconduct includes, but is not limited to, sexual harassment, sexual assault, rape, stalking, and any other unwanted sexual acts or communications.

Single Comprehensive Source of Information (SCSI) refers to this policy and related resources, which provide clear guidance on preventing, reporting, response, support, and rights.

For more definitions, please see Appendix 1.

3. Our commitment

LSCI is committed to:

- Taking **significant and credible action** to prevent harassment and sexual misconduct
- Providing **clear, accessible information** on how students and staff can report concerns
- Offering **appropriate support** to those affected, whether complainants, witnesses, or respondents
- Handling all reports **fairly, promptly, and sensitively**, ensuring procedural fairness
- **Banning the use of non-disclosure agreements (NDAs)** to silence students in harassment or sexual misconduct cases
- Upholding **freedom of speech** and academic freedom, ensuring that measures to prevent harassment do not unduly restrict lawful debate or teaching.

4. Preventive measures

We have implemented a range of actions to reduce the risk of harassment and sexual misconduct, including:

Mandatory training for all students and staff on harassment, consent, reporting procedures, and active bystander intervention

Awareness campaigns promoting respect, inclusivity, and safe campus environments

Anonymous reporting tools and clear reporting pathways

Specialist support services for survivors and accused students

Policies regulating staff-student relationships (see Section 8)

5. Support for students

At LSCI, we provide support to:

- Students who report harassment or sexual misconduct
- Students accused of harassment or sexual misconduct
- Witnesses or others affected

Support includes:

- Counselling and wellbeing services
- Academic adjustments if needed (e.g., deadline extensions)
- Assistance in reporting to police or accessing external specialist services
- Named support contacts for case management
- Support is available regardless of whether a formal complaint is made.

6. Training and awareness

Training is mandatory for:

- All students (during induction and periodically throughout study)
- All staff, including academic, administrative, and support teams including those involved in recruitment and marketing activities
- Staff in specialist roles (e.g., incident investigators and student advisors) who will receive enhanced training

The Training provided to LSCI Staff covers:

- Definitions and examples of harassment and sexual misconduct
- Consent and respectful relationships
- How to report concerns and where to access support?
- Freedom of speech and academic freedom considerations

Training materials are evidence-based and reviewed regularly for effectiveness.

7. Staff-student relationships

To protect students from potential abuse of power:

- **Staff are prohibited from entering into romantic or sexual relationships with any student over whom they have academic, professional, or pastoral**
- Any existing or developing intimate personal relationships between staff and students must be **formally disclosed** to Principal.
- Failure to disclose or any breach of this policy may result in disciplinary action.

8. Freedom of speech and academic freedom

This policy is aimed at LSCI's commitment to uphold freedom of speech and academic freedom. Exposure to lawful academic content, discussion of controversial ideas, or participation in open debate, even if upsetting to some, does not constitute harassment unless it is targeted, personal, and unlawful.

9. Monitoring and continuous improvement

LSCI will:

- Monitor reports and case outcomes
- Evaluate the effectiveness of this policy through feedback, surveys, and data analysis
- Review and update this policy annually
- Report on compliance with Condition E6 to the Governing Board
- Publish an updated version of this Comprehensive Source of Information each year

Student Conduct Procedure

1. Purpose

- This Procedure sets out how LSCI addresses reports of alleged non-academic misconduct, the potential outcomes, and the rights of students within the process.
- The aim is to promote integrity, accountability, and a culture of respect across the College community, while ensuring fair treatment of all parties involved.

2. Applicability and Scope

This Procedure applies to all students enrolled at LSCI from the point of enrolment until the completion of their studies.

It applies to incidents that occur:

- On LSCI premises or associated teaching/learning sites
- During LSCI-arranged placements, visits, or study trips
- Online, including through email, social media, or other digital platforms connected with the College.
- At College events or activities.
- This Procedure does not apply to cases of academic misconduct (e.g., plagiarism or cheating), which are covered by LSCI's Academic Misconduct Policy.

3. Support

- Any student involved in a conduct case (reporting or reported) may access support and advice from the Student Support Team.
- Designated student representatives may also provide independent guidance.
- Reasonable adjustments will be made for students with disabilities or health conditions to ensure fair participation in the process.
- This may include: providing materials in alternative formats, adjusting timelines, or allowing accompaniment at meetings by a support worker.

4. Precautionary Action

- Where necessary, precautionary measures may be taken while an investigation is ongoing. These are neutral measures to ensure safety and fairness, not sanctions.
- Examples include: temporary restrictions on access to facilities, no-contact agreements, or a temporary suspension in serious cases.
- Precautionary actions are reviewed every 10 working days to ensure they remain proportionate and necessary.

5. Reporting Misconduct

All reports will be handled in accordance with the following principles:

Fairness: ensuring impartiality for all parties involved

Sensitivity: recognising the impact of trauma and respecting confidentiality

Transparency: communicating outcomes and decisions to relevant parties

Outcomes may include informal resolution, disciplinary action, safeguarding interventions, or referrals to external authorities where appropriate.

Misconduct may include, but are not limited to:

- Harassment, bullying, or intimidation of students, staff, or visitors.
- Disruptive behaviour in classes, study spaces, or online forums.
- Verbal abuse, threats, or aggressive behaviour.
- Damage to property (deliberate or through negligence).
- Misuse of College facilities or IT systems.
- Possession or use of illegal substances on the College premises.
- Behaviour likely to bring the College into disrepute.

Reporting harassment or sexual misconduct can be made either through disclosing identity of the complainant or anonymously by the individual affected or a third party using the Harassment Allegation Form (Appendix 2) through the following channels:

1. Emailing to the Principal via principal@lsci.org.uk
2. In person to the Student Welfare Officer

- Reports should be submitted as soon as possible after the incident. Anonymous reports will be accepted but may limit the ability to investigate.
- All reports will be handled confidentially and in line with the principles of fairness, sensitivity and transparency.
- Reports should normally be made within 15 working days of an incident, though exceptions may be made for cases such as harassment or safeguarding.

6. Early Resolution

Minor incidents may be addressed informally through early resolution (e.g., a warning, mediation, or guidance).

Early Resolution is appropriate where:

- The incident is isolated and not part of a pattern of behaviour.
- The behaviour is low-level and unintentional.
- Both parties agree to informal resolution.

If the matter is not resolved or is more serious, it will progress to the formal procedure.

7. Investigation and Outcome

7.1 Stage 1: Formal Investigation

An Investigator, independent of the incident, will be appointed to gather evidence and meet with the student(s) involved. The reported student will be informed in writing of the allegation(s) and given the opportunity to respond.

The Investigator may:

- Dismiss the allegation (not upheld).
- Uphold the allegation and recommend a sanction.
- Refer the matter to Prevention of Harassment Panel (PHP) for complex or serious cases

A written record will be kept of all meetings and interviews. Students may be accompanied by a supporter or companion at meetings.

7.2 Stage 2: Outcome

- The Prevention of Harassment Panel (PHP) will consider complex or serious cases, including harassment, bullying, or repeat misconduct.
- The Panel will include senior academic/professional staff and, where appropriate, a student representative.
- The Panel may decide to dismiss the case, uphold it fully/partially, and apply sanctions
- The decision of the Panel will normally be communicated within 10 working days.

8. Sanctions for Misconduct

Factors considered when determining sanctions are:

- Nature and seriousness of the misconduct
- Impact on others and the community
- Mitigating factors (e.g., first offence, remorse, cooperation)
- Aggravating factors (e.g., repeated behaviour, lack of insight, deliberate harm)

Sanctions will be proportionate, educational, and restorative where possible. They may include:

- Verbal or Formal written warning
- Apology or mediation.
- Community or restorative activity
- Fines or charges for repair/replacement of damaged property
- Temporary exclusion from certain activities or facilities
- Suspension from the College for a fixed period
- Permanent exclusion in the most serious cases

10. Right of Review

Students have the right to request a review of a Stage 2 outcome on grounds such as:

- Procedural irregularity.
- Disproportionate sanction.
- New evidence unavailable at the time.

Reviews will be considered by a senior member of staff not previously involved in the case. The outcome of the review may uphold the original decision, amend it, or refer the case back for further consideration. The review outcome will normally be communicated within 15 working days.

11. Confidentiality and Data Handling

- All conduct cases will be handled confidentially, with information shared only on a need-to-know basis.
- Records will be retained in line with LSCI's data protection policy and in compliance with data protection legislation.
- Statistical information may be collected to identify trends and inform preventative measures, but this will be anonymised.
- Confidentiality will be maintained at every stage to protect both reporting and reported parties.

12. Office of the Independent Adjudicator of Higher Education (OIA)

The outcome of the Investigation, Panel (PHP) decision and review represents the final decision of LSCI and marks the completion of its internal procedures. A Completion of Procedures (COP) letter will be issued by email to both the Reported Student and the Reporting Party (if also a student).

The COP letter will include information on the next steps and how to submit a complaint to the Office of the Independent Adjudicator for Higher Education (OIA). Students who remain dissatisfied with the outcome have the right to refer their case to the OIA. Complaints must be submitted within 12 months of the date of the COP letter.

Appendix 1: Definitions

Term	Definition
Allegation	A formal claim that a student has breached University policies or behavioural expectations, prompting review or investigation
Balance of Probabilities	The standard of proof used in procedures, meaning it is more likely than not that the misconduct occurred.
Burden of Proof	The responsibility of LSCI to prove that the misconduct occurred, not the responsibility of the student to disprove it.
Companion	A person who accompanies a student to meetings or hearings, typically a staff member, friend, family member or student representative.
Prevention Harassment Panel	A group of LSCI staff and Student rep convened to consider complex or serious cases of misconduct and determine outcomes and sanctions.
Criminal Proceedings	Legal processes involving the police or courts to determine criminal responsibility.
Disclosure	Involves sharing information about an experience of misconduct, harassment and/or sexual misconduct with a member of LSCI either in person or online using LSCI's Reporting system.
Early Resolution	Informal steps taken to resolve concerns without formal conduct action, usually carried out locally.
Extremism	Holding or promoting views that oppose fundamental values such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. May include behaviour that raises concerns under the Prevent Duty.
Formal Investigation	A structured process led by an independent Investigator to assess formally reported student misconduct, gather evidence, and determine outcomes and sanctions
Freedom of Speech	The right to express lawful views and opinions, including those that may be controversial or unpopular, within the limits of the law and LSCI. This right does not extend to speech that incites hatred, violence, or discrimination.
Harassment	Any unwanted conduct related to a relevant protected characteristic and the conduct has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for another (Section 26, Equality Act 2010). May also include harassment of two or more persons (Section 1, Protection from Harassment Act 1997).
Incident	An occurrence or related event or action relating to alleged misconduct by a student. An incident can include allegations, formal findings of misconduct and LSCI having reasonable grounds for suspecting that misconduct has taken or is taking place.
Misconduct	Behaviour that breaches LSCI policies, including but not limited to harassment, dishonesty, violence, or disruption.
OIA (Office of the Independent Adjudicator)	The independent body that reviews student complaints about higher education providers in England and Wales. Students issued with a Completion of procedures letter at the conclusion of conduct procedures can engage with the OIA at the conclusion of the full conduct procedure.

Precautionary Action	Temporary measures taken to protect individuals or the community while an investigation is ongoing.
Protected Characteristics	Characteristics protected under the Equality Act 2010, including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
Report	Involves the sharing of information with LSCI by an individual that has or is experiencing misconduct for the purposes of initiating a formal procedure and investigation as set out in the Student Conduct Procedure.
Reported Student	The student alleged to have committed misconduct.
Reporting Party	The student(s), staff member(s) or third party who were/are subject to or who witnessed the alleged misconduct.
Safeguarding Policy	LSCI's policy outlining how it protects students and staff from harm, including when it may report concerns to external authorities.
Sanction	An educative, restorative, or corrective action imposed following an Upheld finding of misconduct.
Sexual misconduct	Any unwanted or attempted unwanted conduct of a sexual nature through any medium, including online. Includes, but is not limited to, sexual harassment, sexual assault, and rape. This definition includes the most serious behaviour; it is not intended to be an exhaustive list.
Staff/member of staff	Individuals employed by LSCI, including academic and professional services personnel, and contractors.
Student	A person registered with LSCI, enrolled on a programme of study, including apprentices and students at partner institutions.
Support to Study	A supportive process used when a student's health or wellbeing impacts their ability to engage with their studies or results in poor conduct or behaviour.



Appendix 2: Harassment Allegation Form

CONFIDENTIAL

Harassment Allegation Form

Complainant Info

Student name and IT: _____

Course, Level, Intake: _____

Phone Number: _____

E-mail: _____

Date: _____

Accused Info

Name: _____

Course, Level, Intake (if relevant):

Your relationship to the Accused:

Phone Number:

E-mail:

Victim Info

Name: _____

Course, Level, Intake (if relevant):

Your relationship to the Victim:

Phone Number:

E-mail:

Date of Incident: _____

(If more than one event, please report each event on a separate form)

Where did the specific event occur?

Please explain the events that occurred.

How did you react to the situation? Did you take any action to stop perceived inappropriate behavior?

Describe the harm you have suffered as a result of the event.

Were there any witnesses to this specific event? (If yes, please provide their names.)

Is there any physical evidence that supports your complaint? If so, please describe or attach copy of evidence.

What is your desired outcome of the investigation?

The information provided in this complaint is true and correct to the best of my knowledge. I am willing to cooperate fully in the investigation of my complaint and provide whatever evidence deems relevant.

Signature:

Date:

Please return this form to the Student Welfare Officer