

## **Departmental Guidance on Responding to Disclosures of Harassment, Discrimination or Bullying**

Harassment, discrimination, and bullying (including violence and sexual harassment) have no place at the School or in our Department. We encourage staff and students who experience or witness harassment, discrimination or bullying to report it through one of the [School procedures](#).<sup>1</sup>

### **School Procedures**

If you wish to make a report through school procedures, your options include:

- [Reporting Online](#). There are options to report with your contact details and options for anonymous reporting. It is possible to report anonymously in the first instance and change to a named report at a later time. Reporting online with contact details means that someone from HR (if you are a staff member) or Student Services (if you are a student) will follow up with you and discuss your options. It does not automatically trigger any specific actions or investigations. This discussion is an opportunity to talk about which outcomes would count as satisfactory for the person making the report, and which outcomes are possible and realistic in the circumstances.

The School recognises that individuals are sometimes unsure about whether their experiences fall within the scope of harassment, discrimination or bullying. The School encourages reporting in these cases (there is an option to select 'I'm not sure'), so that somebody from the School can follow up and discuss options.

The School closely monitors all reports (using name-matching and other analytics) and all reports of harassment or sexual misconduct are reviewed and triaged by a specialist staff (either from Student Services if related to a student, or by HR if relating to a member of staff) within two working days. Where appropriate, the School can investigate in response to anonymous reports and carry out certain interventions (for example: speaking to line managers, carrying out surveys, providing training, and implementing additional safety and security measures), but formal investigations or disciplinary processes usually require a named report. The School will provide [termly anonymised summaries](#) of cases reported through the Report and Support system and the outcomes arising.

- Speaking to a member of staff, such as your academic advisor (if a student), mentor (if a staff member), a member of the Department's Equality, Diversity and Inclusion (EDI)

---

<sup>1</sup> In line with School documents, we use the term "disclosure" to indicate communication of a concern or allegation of potential misconduct to a member of staff informally and/or through formal School procedures and "report" to indicate only a formal reporting of an allegation of potential misconduct through School procedures. Every report is therefore a disclosure, in these senses, but not every disclosure is (or will lead to) a report.

committee, the Deputy Head of Department or the Head of Department. Current membership of the EDI committee can be found on our [website](#). Speaking to a member of staff does not mean you have made a report. However, staff can help you understand your options and explain how to make a report. All staff (including Graduate Teaching Assistants) are required to undertake online training in receiving disclosures.<sup>2</sup> In line with this guidance, a person receiving a disclosure will listen actively from a place of belief, without judgement or interrogation. They will explain the reporting options available and signpost to sources of further support. They will make some brief, factual notes of what has been said and read this back to the person making a disclosure to ensure it is accurate (and whether the person making the disclosure would prefer any details to be anonymised). These notes will be kept securely by the person receiving the disclosure and details will not be shared without the consent of the person making the disclosure (subject to the specific exceptions explained below).

- Speaking to a [Safe Contact](#). A safe contact has received enhanced training in taking disclosures and offering support. They can help talk through your reporting options and assist you with accessing support services.
- Speaking to the [School's Independent Sexual Violence Support Service](#), provided by Survivors UK and Rape Crisis South London. They offer independent specialist advice and emotional support to any student or staff member who's experienced sexual misconduct, either recently or in the past. They can provide practical support with making a report and can liaise with the School on behalf of persons who have made a report.

Aside from reporting, the School provides support options that can provide safe spaces to talk about what has happened. These include the student counselling and wellbeing service ([which offers priority appointments for sexual violence or harassment](#)), [staff counselling](#), as well as the [School's Independent Sexual Violence Support Service](#).

The School is committed to keeping in regular contact with persons who make reports, to let them know what is going on. When an investigation takes place, the School aims to provide updates at least monthly. As noted above, the School's Independent Sexual Violence Service can liaise with the School on behalf of a person making a report and facilitate communication between the School and the person making a report regarding the progress of an investigation. For example, advisors can attend meetings to support the person making a report, help the person making a report prepare for meetings, help the person making a report understand and query School policies and prepare questions for the School, act as a critical observer to make

---

<sup>2</sup> This training ("What to do if a student discloses harassment or sexual misconduct to you") is offered to all staff via the School's learning platform (Astute LXP) and is summarized at the end of this document in an infographic. Much of the guidance offered in this training also applies to receiving disclosures from staff members.

sure proper procedures are being followed, request updates on behalf of the person making a report, and offer emotional support and signpost to other sources of support.

Where appropriate, the School can impose interim precautionary measures while an investigation takes place. For example, in the case of a report of sexual violence, the School can impose campus bans and no-contact orders. Police investigations take precedence over School investigations. When a police investigation is ongoing, School investigations are paused.

In cases where the School determines that misconduct has taken place, there are a range of possible disciplinary outcomes, depending on the type and severity of the misconduct. Lower level cases can be informally resolved (supplemented with support, training and mediation) or result in informal warning and letters of apology. More serious cases can result in formal warnings, no contact orders, and (in case of students) being moved out of School accommodation. At the higher levels, disciplinary actions include campus bans and suspensions and (in the most serious cases) termination of employment (in the case of staff) or expulsion (in the case of student).

School investigations are strictly confidential and all parties to those procedures are expected to keep this confidentiality while an investigation is ongoing. Information is only shared on a strictly need-to-know basis during an investigation.

After an investigation is concluded, the School will communicate the outcome to the person who made the report. In doing this, the School will consider the level of detail that is appropriate in the circumstances of each case and any data-sharing risks in line with data protection legislation. Following an investigation, the person making the report is not under any special restrictions in terms of discussing their experiences (and the School has signed a [pledge](#) never to use Non-Disclosure Agreements (NDAs) in cases involving harassment, bullying or other forms of misconduct). Persons who are subject to disciplinary procedures are entitled to appeal the outcomes of those procedures (other parties are not entitled to appeal).

## **Departmental Procedures**

The Department recognises that, in some instances, a person making a disclosure may not (yet) wish to make a formal report. They may wish only to discuss their experiences with a member of staff in confidence.

Members of staff will respect this confidence and not share any non-anonymised details without the consent of the person making a disclosure, subject to the following exceptions:

- Emergencies (for example, if there is a clear and present danger to the safety or welfare of the person making the disclosure or to other individuals, or if the person making the disclosure requires urgent medical attention). In these cases, staff members should dial 999 and inform campus security on 0207 955 6200 (or 2000 from an LSE telephone).

- Disclosures from a person aged under 18 or where a child under 18 (e.g., a sibling) is at risk. The same applies in cases involving vulnerable adults. In the case of concerns about someone aged under 18 or a vulnerable adult, please see the procedure outlined in the School's [safeguarding policy](#).
- If a staff member receiving a disclosure has serious concerns about a student's wellbeing, they should use the School's [Cause for Concern](#) procedure, so that the Student Wellbeing and Mental Health team can offer support confidentially (the Cause for Concern procedure is separate from, and does not engage, the School's reporting procedures).

Staff members receiving a disclosure can seek advice and support from the School while maintaining the anonymity of the person making the disclosure. They can contact:

- In cases relating to students: Pete Evanson (Deputy Head of Student Services) [p.evanson@lse.ac.uk](mailto:p.evanson@lse.ac.uk)
- In cases relating to staff: Kwame Adomakoh (the Department's HR Partner) [K.T.Adomakoh@lse.ac.uk](mailto:K.T.Adomakoh@lse.ac.uk)
- The [School's Independent Sexual Violence Support Service](#).
- Heather Williams (Harassment and Sexual Misconduct Policy Advisor) [h.williams7@lse.ac.uk](mailto:h.williams7@lse.ac.uk)
- Amy Norton (Head of EDI) [a.norton@lse.ac.uk](mailto:a.norton@lse.ac.uk)

Even in the absence of a formal report, a person making a disclosure of harassment, discrimination, or bullying may still wish to work with the Department to explore further steps to ensure that their learning or work environment is safe and inclusive. Steps may be taken which fall within the standard options for informally addressing workplace behaviour that are available to staff and line managers. These steps must not contravene or replicate existing School policies or disciplinary procedures. (Relevant procedures for Professional Services Staff are [here](#) (sec. 5.2), and for staff covered by the Academic Annex [here](#) (Sec. 13.1).)

Such steps will only be taken in consultation with the person making a disclosure. The Department will not communicate to any person named in a disclosure that a disclosure has been made, unless for a specific reason that is discussed fully with the person making the disclosure and with their consent.

As part of taking a disclosure, the staff member will ask the person making the disclosure if they would like to inform the Deputy Head of Department for Education (who is also chair of the EDI Committee) and/or the Head of Department. Provided the staff member has the consent of the person making a disclosure, they may share details of the disclosure on behalf of the person making the disclosure, in order to reduce the burden on the person making the disclosure.

If the person making a disclosure does not want the Deputy Head or Head of Department informed, the member of staff to whom the disclosure is made may take some limited actions that are within the staff member's purview. For example, if the person making a disclosure is a student, the staff member can arrange for the student to move classes.

If the person making a disclosure does consent to informing the Deputy Head of Department or the Head of Department, those informed will review the disclosure. They may contact the person making a disclosure to check that they do not wish to utilise wider school resources and reporting procedures. If they do not, the Deputy Head of Department or Head of Department may aim for the following, where appropriate, in consultation with the person making a disclosure:

**Minimising contact:** Work with the person making a disclosure to minimise contact between them and person(s) named in the disclosure. Possible actions include: changing a student's class/seminar session or class/seminar teacher; organizing Zoom office hours or other events where the person affected requires this to feel safe; re-assigning relevant tasks to staff members in order to limit contact.

**Training:** Arrange for training for persons named in a disclosure and/or for those who can support the person making a disclosure.

**My Adjustments and other support:** Assist the person making a disclosure in accessing support resources, including My Adjustments. This may include liaising with the person's academic advisor or staff mentor, if appropriate and consent is given.

In each case, the staff members involved must consider how these measures can be taken whilst protecting the identity of the person making a disclosure. Details should only be shared on a need-to-know basis and in consultation with the person making a disclosure.

If the Deputy Head of Department or Head of Department has concerns about a risk of harm, they should seek advice and support from the School while maintaining the anonymity of the person making the disclosure.