



HUMAN RESOURCES

Dignity and Respect: Anti-Bullying and Anti-Harassment policy

Document Type	Policy
Document owner	Human Resources
Approved by	Joint Negotiation and Consultative Committee, HR Policy Committee,
Approval date	23 July 2025
Review date	December 2025
Version	2.0
Amendments	
Related Policies & Procedures	LSHTM Values and behaviours framework Personal Relationships Policy Grievance policy and procedure Disciplinary policy and procedure Student Complaints Procedure

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1. Purpose

The purpose of this policy is to:

- State LSHTM's position and duty relating to bullying and harassment, including sexual misconduct
- Raise awareness among our community about behaviour that may constitute bullying or harassment and sexual misconduct
- Guide informal and formal approaches to effectively address harassment, bullying, sexual misconduct and victimisation where these occur

2. Statement of commitment

LSHTM is committed to preventing bullying, harassment and sexual misconduct and to fostering an inclusive environment where all members of our community are valued and able to work or study in an environment that is safe, respectful and supportive.

LSHTM is committed to effectively addressing all reports of bullying, harassment and sexual misconduct through proportionate investigation and action, in order to promote and maintain a safe environment for all staff, students and visitors. Our values of acting with integrity, embracing difference, and working together to create impact are integral to all that we do as we strive to provide an excellent student experience and working culture for all.

No one will be treated less favourably for raising a concern in good faith and where an allegation is found to be true, appropriate action will be taken against the perpetrators, up to and including dismissal of staff or expulsion of students. Individuals who engage in unlawful harassment, bullying and/or victimisation may also be held personally liable for their actions and subject to prosecution under criminal law.

LSHTM recognises harassment as distinct from vigorous academic debate, which is characterised as being respectful, encouraging a variety of viewpoints and having the effect of stimulating and encouraging thought and discussion. While staff and students will hold a range of views on a variety of issues, all members of the University community are expected to treat each other with respect and to ensure that the expression of personal views are not manifested in such a way that creates an environment that is intimidating, hostile, degrading, humiliating or offensive to others.

Critical reviews and discussions about behaviour or performance are a healthy and necessary part of the University's academic and management processes. They are intended to support the development of staff and students and do not, of themselves, constitute harassment. Managers, supervisors and tutors giving feedback should ensure that issues are clearly identified and addressed in an appropriate, constructive and objective way.

3. Scope

This policy applies to all members of the LSHTM community including employees, students, honorary academics, volunteers, contractors, collaborators and visitors. The policy may also apply in some cases where the reporting or responding individual is a third party and not a member of the direct LSHTM community.

This policy applies to situations occurring on LSHTM premises, online, at other locations when on LSHTM business including external, international, academic or research events, and social functions related to LSHTM.

MRC units have their own policies covering bullying and harassment for staff employed by the Units.

4. Responsibilities

4.1 LSHTM Community

All members of the LSHTM community have a personal responsibility to:

- Treat each other with respect, courtesy and consideration. All members of the LSHTM community have the right to expect professional, respectful and inclusive behaviour from each other and have a reciprocal responsibility to behave professionally, respectfully and inclusively towards others
- Actively promote and foster a working and learning environment that is free from bullying and harassment. They must take reasonable measures to ensure that bullying and harassment does not occur at LSHTM
- Participate openly and honestly in the investigation of complaints
- Appropriately challenge or raise unacceptable behaviour when it occurs, if it feels safe to do so, making it clear that such behaviour is not welcomed
- Provide support to individuals who feel they have been subject to bullying, discrimination and/or harassment/ sexual misconduct, including supporting them to make a formal complaint if appropriate
- Complete the mandatory training relevant to their role

4.2 Line managers and Heads of Departments

In addition to their role as a member of the LSHTM community, line managers and Heads of Departments have a responsibility to:

- Implement this policy and ensure that all of their staff and students are aware of this policy and how to access support
- Promote a culture of dignity and respect within their area of work, and an environment in which individuals feel able to raise complaints without fear of victimisation
- Seek to resolve any incidents of inappropriate behaviour promptly and fairly and take all matters seriously
- Inform the designated HR Partner on receipt of any allegation of bullying, harassment and sexual misconduct so that they can provide appropriate support and advice for satisfactory resolution
- Follow any informal reports or actions up via email as a record of actions agreed/taken
- Notify relevant senior managers of any allegation of bullying, harassment and sexual misconduct involving external parties
- Proactively liaise with the designated HR Partner to ensure legitimate, fair and constructive criticism is part of ongoing staff development, without inadvertently humiliating or undermining colleagues
- Complete management training relevant to their role

4.3 Human Resources

Human Resources have a responsibility to:

- Regularly review this policy ensuring it is fit for purpose and supports LSHTM's continuous commitment to promoting dignity and respect
- Provide support and advice to line managers in the application of this policy
- Work with parties as appropriate to support resolutions
- Safeguard confidential information on bullying and harassment cases
- Monitor bullying and harassment levels across LSHTM and engage in reducing this where trends are identified

5. Bullying

Bullying is repeated offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal, and nonverbal conduct. Nonverbal conduct includes email, texts and social media. Bullying could be perceived, even if the effect was unintended by the alleged bully.

Examples of bullying behaviour include:

- Shouting at a person
- Publicly shaming or ridiculing a person
- Setting someone up to fail, e.g. withholding necessary information or deliberately overloading them with work
- Unwarranted or invalid criticism and criticism which lacks the necessary constructive support to help the recipient improve their performance
- Persistently singling out, excluding, isolating, or ignoring an individual as part of a targeted pattern of social rejection or hostile behaviour
- Making threats or comments about job security or academic success or failure without foundation
- Trolling, stalking or 'cyberbullying' through online and social channels
- Physical, verbal or psychological threats
- Excessive levels of supervision

The above examples are not exhaustive. They are, however, indicative of behaviour that would be considered unacceptable conduct by LSHTM.

6. Harassment

Under section 26, the Equality Act 2010 (UK), harassment is legally defined as: “unwanted conduct related to a relevant protected characteristic, that has the purpose or effect of either: violating the person’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person” even if the effect was unintended by the alleged harasser.

Certain forms of harassment at work can amount to unlawful discrimination where behaviours relate to a protected characteristic:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex (including pregnancy and maternity)
- Sexual orientation

Individuals need not possess the relevant characteristic themselves but may be subjected to unacceptable behaviour because they are wrongly perceived to have a protected characteristic, or because of their association with an individual who has a protected characteristic. In addition, individuals have the right to complain about behaviour that they find offensive even if it is not directed at them.

Often harassment is targeted at a particular individual; however a workplace culture that allows derogatory comments or 'banter,' or that excludes some groups in certain work-related activities, can also constitute harassment. Harassment may take place for any number of reasons. An individual may be subjected to harassment because they are perceived as being 'different to the norm' in some way or are in a less powerful position than the person causing the offence. It is important to recognise that harassment can occur outside traditional power relationships; for instance, a manager can be harassed by an employee or an employee harassed by a student.

7. Sexual Misconduct

For the purposes of this Policy, 'Sexual Misconduct' is defined as any unwanted conduct of a sexual nature. 'Sexual misconduct' means any unwanted or attempted unwanted conduct of a sexual nature which occurred in person (on or off LSHTM grounds) or through other forms of communication, e.g. online and includes, Sexual harassment as defined by Section 26(2) Equality Act 2010, Assault as defined by the Sexual Offences Act 2003 and Rape as defined by the Sexual Offences Act 2003.

Sexual misconduct is unlawful and will not be tolerated. The law requires employers to take reasonable steps to prevent sexual harassment of their workers. Regulatory requirement, Condition E6 introduced by the Office for Students (OfS), requires higher education providers to take effective steps to prevent and address sexual misconduct affecting students.

Sexual relationships, romantic relationships or friendships between staff members and students can jeopardise the distinctive relationship that exists between these groups. All members of LSHTM should be aware that such relationships can create real and perceived conflicts of interest for both groups. Further information is available from the Personal Relationships Policy.

Behaviour amounting to harassment could include a serious one-off incident, repeated behaviour, spoken or written words, imagery, graffiti, gestures, mimicry, jokes, pranks, or physical behaviour that affects the person. Please refer to section 15 for some further examples and definitions.

8. Procedures for resolution

It can be challenging to deal with bullying, harassment and sexual misconduct, especially where close colleagues, tutors or managers are involved, but it is important to address any concerns at an early stage and to seek help when needed. No one will be treated less favourably or suffer any detriment for having raised or supported an allegation made in good faith.

LSHTM will ensure that anyone who raises an allegation is appropriately supported throughout the complaints process and if necessary will consider steps such as a change of line manager, working area or hours. Anyone who is responding to an allegation will be treated with dignity and respect, and will be directed to avenues of support.

If a person believes they are being subjected to bullying, harassment or sexual misconduct, it is recommended that, where possible and appropriate, they attempt to resolve the situation informally in the first instance. Informal approaches can have the advantage of resolving the situation quickly and with minimal disruption to relationships and can often be the most effective method.

8.1 Informal resolution

8.1.1 Talk directly with the person causing offence

Depending on the issue, it can be effective to have a private conversation in the first instance if it feels safe to do so. This conversation could include an explanation of the behaviours that occurred and the impact they had, with an opportunity for that person to either explain their perspective or reflect on the impact in a non-judgemental space. This can be particularly impactful in the event of a misunderstanding or difference in perspectives. The conversation could be face to face or in writing, depending on which feels easier to facilitate that dialogue. If choosing email or written text to communicate, be mindful that tone can be lost or misconstrued, which may have the opposite effect.

This conversation can be between the reporting and responding individuals directly, or a supportive third party could be present, such as another colleague, Anti-Bullying and Harassment Advisor, Trade Union representative or anyone else suitable. And/or:

8.1.2 Raise the matter with the line manager for informal resolution

The reporting individual should raise the issue with the relevant line manager, normally their own line manager, although the line manager of the responding individual may also have a role to play. The line manager (or appropriate other) will discuss the reporting individual's concerns in confidence and provide advice on how to address the matter or undertake the necessary enquires to help address the issue. The line manager (or appropriate other) will also attempt to identify possible resolutions. This may involve training/support, having an informal conversation, bringing together the reporting and responding individuals to facilitate a discussion and/or exploring the possibility of mediation.

If the concern is regarding the reporting individual's immediate line manager, the concerns should be raised with the manager above the line manager.

In all cases, the communication should:

- Explain to the responding individual how their behaviour and/or actions are making the reporting individual feel
- Include examples of the unwanted behaviour
- Request that the behaviour/actions stops immediately
- Remind the responding individual of this policy, and how the complaint will be progressed if behaviours continue
- Conclude with a written record of the meeting such as an email, which can be shared with HR if further action is required

Staff who do not feel comfortable in approaching their line manager may ask for support from the designated HR Partner.

Students who experience or witness bullying or harassment, may raise the issue with their personal tutor, Associate Dean of Education, the Students' Representative Council, or a member of Student Support Services. In cases where the concern relates to a staff member, a relevant manager may also be approached, with support from the above if needed.

If the inappropriate behaviour continues after informal measures have been taken, or the reporting individual feels it cannot be resolved informally due to the seriousness of the matter, the reporting individual may want to explore the possibility of mediation and / or raise a formal complaint.

8.2 Mediation

8.2.1

Mediation is an important consideration for resolving issues at an early stage and LSHTM strongly encourages individuals to participate where this is recommended as a way of resolving the complaint. It is a voluntary process where a qualified mediator enables two or more people to work through conflict or disagreement, with a view to finding a mutually agreeable solution and/or rebuilding relationships.

Mediation can be a good way to help see the other person's perspective and help the other side see how their behaviour is impacting others. Sometimes behaviours are perceived as harassment or bullying which may not have been intended.

8.2.2 How to arrange mediation

Mediation can only take place when all parties are willing to mediate. LSHTM may recommend mediation as part of informal resolutions (see section 8.1) and in responding to formal complaints (see section 9). Where deemed to be appropriate, mediation for staff can be arranged by contacting the designated HR Partner. Students can be referred by employees in faculties or departments or by Student Support Services, or other professional units in LSHTM.

9. Procedures for making a formal complaint

If an individual feels that informal methods have not resolved the matter, or if the bullying and harassment is particularly serious, or it is a sexual misconduct complaint a formal allegation (a 'grievance') may be submitted as follows:

9.1 For students

Students who wish to raise a formal grievance should do this through the Students complaint procedure. To initiate the first formal stage of the [Student Complaints Procedure](#) (stage 2), students should put the complaint in writing using the [Student Complaints Form](#) and send it to LSHTM's studentcomplaints@lshtm.ac.uk. Alternatively students can raise their complaint via the Report and Support platform. The Head of Registry or their nominee will acknowledge receipt of the complaint within five working days. LSHTM aims to provide a response within twenty days from receipt of the complaint.

Where a complaint is raised under the Student Complaints Procedure and the alleged harasser is a member of staff, the officer appointed to investigate the student complaint will inform HR of the allegations and keep them informed throughout the process so that a separate staff procedure can be invoked if required.

9.2 For Staff

Formal complaints of bullying or harassment can be raised under the LSHTM Grievance Policy and Procedure. Grievances may be raised by staff who have been bullied or harassed or who consider that another member of the LSHTM community has been bullied or harassed. To raise a grievance, staff should complete the grievance form template and submit this to their line manager or head of department.

In addition, managers may engage the disciplinary procedures to deal with occurrences of bullying and harassment they become aware of. It is not necessary for a grievance to have been issued for a manager to initiate an investigation. Where an investigation finds that harassment has taken place, this may result in disciplinary action under the relevant staff or student procedure.

Under the formal procedure within this policy, usually:

- The reporting individual will be asked to set out their complaint in writing by completing a grievance form or raise their complaint via the Report and Support platform, including as much detail as possible, for example the responding individual's name, the nature of the

concern, the dates of the alleged acts of bullying/harassment, names of any witnesses, and details of any action taken to address the matter so far;

- A meeting will be held with the responding individual to ascertain their response to the allegations;
- Further investigations will be carried out where necessary, including interviewing potential witnesses who will be instructed to keep the matter confidential;
- The reporting individual will be invited to a meeting to discuss their complaint in full and will have the right to be accompanied by a colleague or trade union representative;
- Where appropriate the reporting individual will be invited to a further meeting to be asked further questions in light of any information gathered from the responding individual and/or witnesses;
- All the evidence will be considered in full and a decision will be made on the outcome; and
- The employee/student will be informed of the decision and, if the complaint has been upheld, disciplinary action will be instigated up to and including dismissal against the respondent. .

All formal complaints will be investigated fully in an objective and confidential way, while also ensuring that the rights of the complainant and the responding individual are respected. Investigations will be concluded as swiftly as possible while ensuring a sufficiently thorough approach. Timeframes will vary according to the complexity and scope of each case and where possible, correspondence will include likely timeframes for updates or next steps. The relevant HR Partner should be contacted regarding any concerns or questions about the process.

9.3 For members of the LSHTM community who are not staff or students

Where members of the LSHTM community, who are not staff or students, e.g. volunteers, contractors, collaborators or visitors wish to raise a formal concern, this can be actioned through the Report and Support platform, or by contacting a senior member of LSHTM staff.

Where concerns arise and the responding individual is not an employee or student, the procedure may need to be adjusted to ensure appropriate investigations are conducted. Any adjustments will be discussed with the reporting individual and the law requires employers to take reasonable steps to prevent sexual harassment by third parties. Harassment by third parties towards employees will not be tolerated and should be reported.

If a member of the LSHTM community (staff or student) experiences or witnesses bullying, harassment or other inappropriate conduct by someone who is not an LSHTM employee or student (for example, an employee of a partner organisation, contractor, collaborator, or visitor), LSHTM's ability to investigate or take direct disciplinary action may be limited.

In such cases, LSHTM will take the matter seriously and will explore appropriate steps to support the individual affected. This may include:

- Providing guidance and support through HR, the Registry, or Student Support Services;
- Liaising with the relevant external organisation or employer, where appropriate, to encourage them to investigate and take action under their own procedures;
- Considering temporary changes to working or study arrangements to protect the wellbeing of those involved.

LSHTM will take into account the circumstances and risks involved in each case, and will aim to act in a way that supports the safety, dignity and welfare of its staff and students, while respecting legal boundaries.

10. Reasonableness

On occasion, individual perceptions of behaviour may differ due, for instance, to differences in attitude, experience or culture, and what one person would consider acceptable behaviour may be unacceptable to another.

The defining factor in determining whether conduct amounts to harassment is whether the behaviour is unacceptable to the recipient and could 'reasonably be considered' to amount to harassment. The intention of the person engaging in the behaviour, whether or not they meant to harass, is not a primary factor in determining if harassment has taken place.

When considering allegations of harassment, the person hearing the complaint on behalf of LSHTM will need to apply a test of 'reasonableness' to determine if harassment has taken place. That is, with due regard to the circumstances, including in particular the perception of the reporting individual, and whether the behaviour in question could 'reasonably be considered' to cause harassment, thereby creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

11. Reporting concerns to the Police

Where harassment constitutes a criminal offence such as physical or sexual misconduct, assault and/or an immediate threat to safety, LSHTM encourages reporting the matter to the police as soon as possible.

12. Confidentiality

Anyone involved with an informal or formal complaint about bullying, harassment or sexual misconduct, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.

Breaching confidentiality or acting without due care or sensitivity in a case of bullying, harassment or sexual misconduct, may result in disciplinary action being taken up to and including dismissal (or other appropriate action for non-employees).

Confidentiality will be maintained in so far as this is possible, and information will only be shared with others on a need to know basis in order to facilitate the effective functioning of LSHTM's policy and processes. There is however information that will need to be shared, such as the name of the individual raising the complaint and details of the issue raised so that the person who has caused offence can respond to the allegations. Some details may have to be shared with potential witnesses and line managers may need information to support employees, facilitate time off for investigation meetings or to implement actions after an investigation has concluded.

Any report which raises concerns for the safety of an individual may require information to be shared with the police or other external authority. LSHTM will not usually share information without consent, but in exceptional circumstances may decide to do so and a reason for that decision will be recorded.

13. Research funding applications and notifying funders

A number of research funders have policies on bullying and harassment which set out expectations of behaviour from all those associated with research they fund, but also impose requirements on institutions in receipt of funding from them. This includes obligations to report information about bullying and harassment to the funder.

LSHTM will release the minimum amount of information necessary, with reference to the requirements of data protection legislation; and the individuals concerned would be informed in advance. Anyone concerned that they may be impacted by these requirements should contact the designated HR Partner.

14. Reporting and Anonymity

Report and Support is a platform available to all members of the LSHTM community. The platform includes a range of links to supportive resources on a range of topics. Reports can be made via the platform at any time and alongside any of the other listed actions within this policy. Members of the LSHTM community can report situations via the platform by making an anonymous report or a named report that includes their contact details. If an individual chooses to include their name they can choose whether they want to access support only, support and informal action, or support and a formal investigation.

It should be noted that while anonymous reporting provides data which is used to identify and monitor trends, LSHTM will not be able to act upon anonymous reports where there is insufficient information to undertake a fair and thorough investigation. LSHTM could find it hard to justify taking formal action based on an anonymous complaint without supporting evidence because responding individuals have a right of reply which typically requires a level of detail which may not be compatible with anonymity of reporting individuals.

Reports help LSHTM to identify patterns and inform wider preventative and proactive initiatives to address bullying and harassment. Data from Report and Support and HR is reported to EDI Committee, the Executive Team, to Senate, Audit and Risk Committee, People Equality, Diversity and Inclusion Committee, and Council on an annual basis.

14.1 Anonymity and confidentiality in Informal and Formal Complaints (Including Outside the Report and Support Platform)

While LSHTM encourages the use of the Report and Support platform for both anonymous and named reports, individuals may also raise concerns through other designated routes, including informally with line managers or formally under the Grievance Procedure for staff or through the formal stage of the Students Complaint Procedure.

Anonymous reports made through these routes (e.g. unsigned letters or emails without identifying information) will be reviewed, and LSHTM will assess whether there is enough information to act. As with reports submitted anonymously via Report and Support, LSHTM may be unable to pursue action where there is insufficient information to conduct a fair and thorough investigation. However, such reports can still contribute to broader understanding of concerns and patterns of behaviour.

Named complaints that include a request for confidentiality (i.e., where an individual discloses their identity to the person receiving the report but requests that it not be shared further) will be treated with care. The wishes of the reporting individual will be respected where possible, and no action will be taken without their consent unless there is a strong reason to do so — such as a significant risk to the safety or well-being of others. As a result, LSHTM cannot guarantee that anonymity will be maintained. Anonymous reporting is the only way to ensure that personal

details are not shared with any reported parties, and LSHTM may choose to override the request for confidentiality within the limits of the law.

However, individuals should be aware that:

In formal complaints, procedural fairness may most often require the disclosure of certain details, including the complainant's identity, to the individual who is the subject of the complaint, to prevent the latter from being at a disadvantage during the formal process.

In informal cases, efforts can be made to address behaviours without necessarily identifying the individual raising the concern (e.g., via training, reminders of expected behaviour, or general discussions), but the scope for specific action may be limited.

If LSHTM decides to proceed with a matter despite a request for confidentiality (for example, where there is an overriding duty of care), this decision will be clearly explained to the complainant, and the rationale recorded. This decision will be subject to the Appeals Policy and Procedure.

Individuals are encouraged to discuss any concerns about confidentiality or anonymity with HR or a designated adviser at the earliest opportunity, so they can make informed choices about how to proceed before triggering any processes that may override their concerns for anonymity.

14.2 Third-Party (or "Ally") Reporting

LSHTM recognises that in some circumstances, individuals may wish to raise concerns about bullying, harassment or sexual misconduct on behalf of someone else—for example, a colleague who feels unable to come forward themselves.

Where this occurs:

- LSHTM will listen to the concern and take it seriously.
- In line with our duty of care, we may make initial enquiries or offer informal interventions if appropriate.
- However, the ability to take formal action may be limited without the direct involvement of the individual affected, particularly where that person does not consent to being identified or to engaging with the process.

If a third-party report raises safeguarding or serious misconduct concerns, LSHTM may decide to act, even if the affected individual does not wish to participate. In these cases, we will seek to manage the process with the utmost care and sensitivity, and any decision to proceed will be explained and recorded.

14.3 Safeguarding and Serious Risk Concerns

If a report of bullying or harassment raises **serious safeguarding concerns**—such as a significant risk of harm to the individual concerned, to others, or to the wider community—LSHTM will take appropriate and proportionate action to manage that risk, even if the affected individual does not wish to pursue a formal complaint.

In such cases, the complaint will be escalated to the **relevant Dean of Faculty or the Director of LSHTM**, and a **risk assessment** will be conducted. This process may involve the **Head of Registry & Student Systems (for student-related cases)**, the **Head of Legal**, and other appropriate senior officers such as HR or Health & Safety.

Safeguarding concerns may include (but are not limited to):

- Repeated or escalating abusive behaviour;
- Threats of violence or self-harm;
- Abuse of power or position;

- Potential criminal conduct or serious misconduct.

Any information will be handled sensitively and shared only with those who need to know in order to assess and respond to the risk appropriately. In rare and exceptional cases, LSHTM may decide to share information with external authorities (such as the police or safeguarding bodies) where it believes there is a legal or ethical obligation to do so. Where possible, the individual concerned will be informed of this decision and the reasons for it.

15. Further examples of Harassment and definitions

	Some examples of behaviour that may constitute Harassment
Age	<p>Jokes or insults about a person's age</p> <p>Singling out a person for different treatment as a result of their age</p> <p>Undermining their views or ignoring a person because they are younger or older</p>
Disability	<p>Use of insulting terminology when referring to a physical or mental disability</p> <p>Denying opportunities based on mistaken assumptions about capability</p>
Gender reassignment	<p>Deliberately or repeatedly using incorrect pronouns</p> <p>Spreading rumours or gossip about gender identity, expression or history</p>
Race	<p>Offensive remarks about dress, culture or customs that have the effect of ridiculing or undermining.</p> <p>Conduct or comments based on stereotypical perceptions or prejudices based on race.</p> <p>Fostering hatred or prejudice towards individuals of particular racial groups</p>
Religion or belief	<p>Exclusion from normal workplace interactions or social events due to an individual's religion or perceived religion</p> <p>Jokes or insults about items of clothing, religious artefacts, religious beliefs or rituals</p>
Sex (including pregnancy and maternity)	<p>Harassment related to sex describes unwanted conduct that is directed at a person because they are male or female. This could involve excluding someone because they are female</p> <p>Harassment related to sex is distinct from Sexual Harassment which is covered separately below.</p>
Sexual Harassment	Physical conduct of a sexual nature, unwelcome physical contact or intimidation.

	<p>Persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions</p> <p>Showing or sending offensive or pornographic material by any means (e.g. by text, video clip, email or by posting on the internet or social media)</p> <p>Unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults</p> <p>Offensive comments about appearance or dress, innuendo or lewd comments</p> <p>Leering, whistling or making sexually suggestive gestures</p> <p>Intrusion by pestering, spying or stalking</p>
Sexual orientation (including civil partnership)	<p>Derogatory name calling. Homophobic or bi-phobic jokes</p> <p>Offensive remarks or gossip relating to a person's actual or perceived sexual orientation, relationship or relationship history</p>
Sexual Misconduct	<ul style="list-style-type: none"> - Sexual harassment as defined by Section 26(2) Equality Act 2010. - Assault as defined by the Sexual Offences Act 2003. - Rape as defined by the Sexual Offences Act 2003. <p>It includes, but is not limited to, the following behaviours;</p> <ul style="list-style-type: none"> a. Sexual misconduct involving sexual contact; b. Engaging, or attempting to engage in a sexual act(s) with another individual without consent c. Kissing without consent d. Sexually touching another person (including through clothes) without their consent. 'Sexually touching' includes any intentional physical contact that was sexual or sexually motivated and in which the other person did not consent to being touched in this way, this can include touching, pinching, groping, smacking, stroking their hair, touching their body or deliberately rubbing or brushing up against them or standing too close to them e. Intimidation or promising resources or benefits in return for sexual favours f. Distributing private and personal explicit images or video footage of an individual without their consent as defined by the Criminal Justice and Courts Act 2015. g. Indecent exposure h. Repeatedly following another person without good reason, or repeatedly harassing them e.g. by sending unwanted communications of a sexual nature or watching/spying on a person/forcing contact through any means including social media

	i. Recording and/or sharing intimate images or recordings of another person without their consent j. Showing or sending sexual images to another person with the intention to sexually harass, abuse or incite harassment or abuse j. Filming or photographing under a person's clothes without their consent to capture images of their body or underwear ("upskirting").
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Harassment can occur in many forms and can take place either at work or outside of the workplace. The above examples are not exhaustive. They are, however, indicative of behaviour that would be considered unacceptable conduct by LSHTM.

16. Discrimination

Discrimination is unlawful treatment of someone unfairly because of a **protected characteristic**, as defined by the **Equality Act 2010**. These characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, pregnancy and maternity, and marriage or civil partnership.

16.1 Types of Discrimination

16.1.1 Direct Discrimination

Occurs when someone is treated less favourably due to a protected characteristic.

Examples: - Rejecting a job applicant because of their disability.

- Refusing to promote an employee because of their disability

Includes:

- **By association** – e.g. treating someone unfairly because they care for a disabled person.
- **By perception** – e.g. assuming someone is of a certain religion and treating them differently.

16.1.2 Indirect Discrimination

This occurs when a policy or practice applies to everyone but disadvantages a group with a protected characteristic and it is not a proportionate means of achieving a legitimate aim.

Example: Requiring full-time work may unfairly affect women with childcare responsibilities, unless objectively justified.

16.2 Discrimination Arising from Disability

This is when a disabled person is treated unfavourably because of something that results from a disability, not because of the disability itself.

Example: Disciplining someone for taking time off for medical treatment related to their disability.

16.3 Pregnancy and Maternity Discrimination

It is unlawful to treat someone unfavourably due to pregnancy, maternity leave, or related illness.

Examples: Withdrawing a promotion opportunity from a woman on maternity leave.

Dismissing a woman because she is pregnant

Changing job duties without justification while someone is on maternity leave

16.4 Gender Reassignment Discrimination

Unfavourable treatment due to absence for gender reassignment must not be treated less

favourably than other medical absences.

Example: Denying time off for medical appointments related to gender reassignment, while allowing it for other health-related absences.

16.5 Lawful Discrimination (exceptions)

In limited, exceptional circumstances, discrimination may be lawful:

- **Objective Justification** – where the action is proportionate and achieves a legitimate aim (e.g. health and safety).
- **Positive Action** – initiatives supporting underrepresented groups, if proportionate.
- **Occupational Requirement** – if a protected characteristic is genuinely essential for the role and justifiable.

Example: A role requiring fluency in a specific language for community engagement.

16.6

In accordance with LSHTM's statutory duties and dedication to academic freedom, all complaints will be assessed and managed in a way that safeguards lawful freedom of expression. This includes speech that may be controversial, challenging, or offensive, provided it does not violate the law. This protection extends to statements made online or in personal capacities, as long as they are lawful and not directly linked to misconduct under LSHTM policy.

No complaint will be pursued solely on the basis that an individual has expressed a lawful opinion or belief, whether within or outside the institution. When concerns are raised about protected expression, the threshold for intervention will be high, and decisions will weigh the rights of others against the legal right to free expression under the Education (No. 2) Act 1986 and the Higher Education (Freedom of Speech) Act 2023.

17. Victimisation

Victimisation refers to treating an individual less favourably because they have, in good faith, complained about bullying or harassment, or supported someone else to make a complaint.

Examples of victimisation could be to allocate a heavier or more difficult workload, labelling as a 'troublemaker,' or deliberately blocking opportunities to advance academically or professionally.

Victimisation is unlawful and will be treated as a form of harassment under this policy.

18. Microaggressions

Microaggressions are brief, everyday interactions that send denigrating messages to people, which are subtle and insidious, often leaving the victim confused, distressed and frustrated and the perpetrator oblivious of the offence they have caused. Microaggressions can be intentional or unintentional.

Serious or repeated microaggressions may amount to unlawful harassment, bullying or discrimination. Even less serious microaggressions which do not meet the definition of harassment can negatively impact the health and wellbeing of the person experiencing them.

It is everyone's responsibility to think about the impact that their words might have on someone else. Examples of microaggressions include:

- Backhanded compliments
- Avoiding or turning one's back on certain people
- Asking someone "Where are you really from?"
- Referring to a professional woman as a 'girl'
- Asking a person if that is their 'natural' hair
- Sexual objectification
- Endorsing religious stereotypes

Microaggressions that meet the threshold for harassment will be addressed in accordance with this policy.

19. Hate Crime

Hate crime is criminal behaviour which targets a person or group because of malice or hatred towards them due to their identity, such as their disability, race, religion, sexual orientation or transgender status. Hate crimes are motivated by prejudice or intolerance, and can lead to an environment in which people experience or could reasonably fear harassment, intimidation or violence.

Hate crime is unlawful and is treated as a form of harassment under this policy.

20. Use of electronic and social media

Bullying and Harassment can take place through electronic and social media (Social media channels, blogs, phone, WhatsApp groups, forums, email, etc.). In sending electronic communications or images, the timing, length, content, language and appropriateness of such communications should be considered.

Individuals should avoid:

- Using language which would be deemed to be offensive to others in a face-to-face setting
- Forming or joining an online group that isolates or victimises students or colleagues
- Sites which access or share illegal content
- Using the internet or other electronic communication tools to frighten, intimidate, harass or spy on someone

If instances of what might be online harassment are reported they will be dealt with in the same way as if they had taken place in a face-to-face setting.

21. Failure to comply

The following may be treated as misconduct under the staff and student disciplinary procedures:

- Failure to reasonably comply with this policy
- Making false, malicious or vexatious allegations under this procedure (and any investigation based on those allegations will be terminated)
- Retaliating against or victimising staff or students who make complaints in good faith or participate in investigations in good faith under this procedure

22. Training, embedding and monitoring

To ensure that all staff and students are clear on what is expected of them and what they in turn can expect:

- All employees are required to undertake equity, diversity and inclusion training and anti-bullying and harassment training as part of their onboarding programme, with refresher training at regular intervals thereafter.
- All employees are made aware of the LSHTM Values and behavioural framework in the local and corporate induction and there are regular reminders to existing staff
- All employees with line management responsibilities are required to undertake additional training which includes how to manage complaints, and to complete a refresher at three years .
- All employees are encouraged to attend events and workshops organised by LSHTM to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.
- Monitoring of the workplace culture takes place through anonymous surveys, exit interviews, one-to-one conversations and through staff networks to identify and address any issues.
- All students sign up to the LSHTM [Student charter](#) as part of their enrolment. Student Charter summarises the standards of service which LSHTM expects and aspires to offer students, and the standards of conduct which students should expect and aspire to follow.

23. Support Contacts

There are a variety of support options available to students and employees who may have experienced bullying or harassment. [Report + Support](#) provides open access to support and resources, which includes LSHTM resources, external support, policies, and procedures

Name	Contact details	Service provided
Anti-bullying and Harassment Advisor Network	LSHTM's Anti-bullying and Harassment Advisors offer support to staff or students	Employees or students witnessing, experiencing or subject to bullying or harassment allegations can talk through the options available in line with this policy.
Human Resources	Please click this link to access a list of HR staff	Employees can seek support and advice from their HR Partner at any stage of this procedure.
Equity, Diversity & Inclusion Team	Please click this link to access information on Equity, Diversity and Inclusion - Home (sharepoint.com)	Employees or students can seek advice on EDI related matters.
Occupational Health (provided by Cordell Health)	complete the Self-Referral Form and submit to OHBookings@lshtm.ac.uk .	Employees can refer themselves to OH for confidential health advice at any time. If you are concerned that work is affecting your health or a health problem is affecting your work and would prefer a more informal approach to discussing this with an Occupational Health Practitioner

Employee Assistance Programme	Employee Assistance Programme or call 24/7 confidential helpline on 0800 028 0199	Employees can access free and confidential access to expert advice and compassionate guidance and support, including 6 free counselling sessions.
Student Support Services	Student support services are based at G20a Keppel Street General queries: sss@lshtm.ac.uk Student Support Services Homepage	Students can access confidential advice and support on any issues that may be affecting wellbeing or their ability to study
Trade Unions	ucu@lshtm.ac.uk unison@lshtm.ac.uk unite@lshtm.ac.uk	LSHTM recognise the University and College Union (UCU), UNITE and UNISON.
Mental Health First Aiders	IN EMERGENCY CALL ext. 555 (020 7927 2555) or 020 7436 8032 Mental-Health-First-Aid Homepage	Employees or students can access immediate mental health support from Mental Health First Aiders
Chaplain	chaplaincy@lshtm.ac.uk Chaplaincy Homepage	Employees and students of all faiths and non can access spiritual, religious and emotional wellbeing support from the Chaplaincy