

### **Alumni Misconduct Procedure**

#### **Purpose**

- 1.The LSE ('the School') Articles of Association set out its main objectives of education and research. These can be met only if students, staff and alumni visitors can conduct their business in conditions that permit freedom of thought and expression and in which they show respect to one another. The School has put this Alumni Misconduct Procedure ('the Procedure') in place to maintain such conditions and to protect the School from actions that may harm it or members of the LSE Community.
- 2. It will be a breach under this Procedure if an Alumnus/na is found to have breached one or more of the School's terms or conditions, policies or procedures, codes, rules or regulations. This list includes, but is not limited to, the School's <u>Discrimination</u>, <u>Harassment and Bullying Policy</u>, <u>Sexual Harassment and Sexual Violence Policy</u>, <u>Ethics Code</u>, <u>Conditions of Use of IT Facilities</u> and other <u>School policies and procedures</u>.
- 3. The support and services provided to alumni by the School are provided on a discretionary basis. This includes, but is not limited to, the LSE alumni email account, online library access, membership of Alumni Associations and invitations to School events. The Philanthropy and Global Engagement Division reserves the right to remove or partially remove privileges and access rights to the School's services (see Appendix E), including those provided to alumni groups, if it deems that the relevant School terms and conditions have been breached.

#### **Status**

4. The Secretary's Division (in consultation with the Philanthropy and Global Engagement Division) are responsible for the content of this Procedure.

#### **Application**

- 5. This Procedure will apply to allegations of misconduct made against alumni of the School. For the avoidance of doubt, this Procedure will apply to all alumni when attending a School or associated activity, using a School platform or service, either in person or online, or using any other communication method and all alumni visitors to the School Premises and Alumni Centre.
- 6. The School will use this Procedure to determine whether an Alumnus/na has breached any of its terms or conditions, policies or procedures, rules or regulations.
- 7. This Procedure will apply to incidents of alleged misconduct that occur on and off the School's premises (including via social media) where it affects the School's reputation in the local community or more widely as part of activities organised or authorised by the School as well as applying to misconduct raised in accordance with section 9 of this Procedure and where the alleged victim could be the School itself, a student or employee of the School or others visiting, working or studying at the School as well as members of the Public.
- 8. A local procedure that is specific to an area of the School may be used to resolve some allegations of misconduct. The application of a local procedure will not necessarily preclude the use of this Procedure. In such cases, the School will inform the Alumnus/na from the outset which Procedure will be used or considered first.
- 9. The School also reserves the right to consider third party allegations and/or historic allegations of serious alleged alumni misconduct that are raised formally with it and where the School assesses that there may be a continued risk to other members of the LSE community if a matter is not investigated.
- 10. Deviations from this Procedure will not invalidate any action taken against an Alumnus/na unless the integrity of the process is compromised. The person who is overseeing an investigation at different stages, usually the Head of Alumni Engagement or their Nominee or the Secretary or their

Nominee, will decide when and how to deviate from this Procedure, and explain to the affected parties the reason for doing so.

#### **Equality and Diversity**

11. Members of staff involved in a potential or actual disciplinary case must give consideration to any equality and diversity matters which may be relevant, particularly in relation to the following diversity strands which are referred to in the Equality Act 2010: age, disability (including mental health and wellbeing), race, gender, gender reassignment, pregnancy and maternity, religion or belief and sexual orientation. At different stages of the disciplinary procedure, requests for reasonable adjustments should be made to the Head of Alumni Engagement or their Nominee, or the Secretary or their Nominee, (whichever is overseeing an investigation at the time). 12. In some instances, the Head of Alumni Engagement or their Nominee, or the Secretary or their Nominee, may decide to postpone, interrupt or not pursue a disciplinary case because a key person is, for medical or other reasons, unfit to participate in it. This type of decision must be based on evidence that the Head of Alumni Engagement or their Nominee, considers relevant and adequate. The Secretary or their Nominee reserves the right to reject or ask for an independent assessment of evidence if its relevance or adequacy is doubted.

#### **Confidentiality and Data Protection**

- 13. The School will handle disciplinary cases in accordance with its own relevant confidentiality and data protection policies as well as the Data Protection Act 2018, the UK GDPR and The General Data Protection Regulation (GDPR) (2016/679). The <u>Alumni Privacy Notice</u> will also provide further information. Information relating to any matter of misconduct shall be kept confidential and will only be shared with other relevant members of School staff where it is strictly necessary on a need-to-know basis in order to investigate and/or determine an outcome of an alleged breach of discipline, dealing with any complaint arising out of it and/or implementing any sanctions or measures following a decision.
- 14. The relevant members of School staff may include but are not limited to certain members of the Security team, the Disability and Wellbeing Service, Head of Residential Life, Student Services staff, Human Resources (e.g., in cases where the Alumnus/na is also employed by the School), and also may include Alumni Associations and volunteers. They may also be notified of the outcome of this Procedure on a need-to-know basis as well as for the purposes of implementation sanctions or measures. Information on the Alumnus/na's misconduct and any penalty imposed will be included on the

Alumnus/na's record held by the Philanthropy and Global Engagement Division.

15. Personal data will not usually be shared with any third party unless the School has express consent to do so. However, there may be instances where the School may have to disclose confidential information to the police/courts without an Alumnus/na's consent (where in exceptional circumstances the School considers that there is a high risk of continuing harm to reporting members within the LSE Community or to prevent a further incident which constitutes a criminal offence from occurring).

#### **Criminal Offences**

- 16. Where appropriate, the School will consider referring incidents to the Police. Although the School would not ordinarily pursue disciplinary action against an Alumnus/na while they are the subject of a Police investigation, it reserves the right to do so; particularly if the safety of one or more members of the School is at risk. This Procedure is not an alternative to investigations carried out by the Police.
- 17. Where an Alumnus/na is acquitted of a criminal offence or where the criminal investigation has been dropped, the School may still take action under this Procedure.

#### **Precautionary Measures**

18. The School can put in place precautionary measures against an Alumnus/na who is alleged to have committed a criminal offence or a breach of School policies and procedures at an early stage pending the outcome of criminal and/or disciplinary proceedings under this Procedure. For the avoidance of doubt, the implementation of such measures does not indicate that the Alumnus/na is guilty of misconduct, it is just a precautionary measure taken whilst a full investigation is carried out and completed.

- 19. The grounds for initiating precautionary measures are:
  - To ensure that a full and proper investigation can be carried out by the Police/School and/or;
  - To protect the reporting member of the LSE community whilst the allegation is being dealt with as part of a criminal/disciplinary process;
  - In cases which may involve serious harm to the reporting member of the community and/or others within the LSE Community;
  - Where a reporting party's mental health is at risk or where they display significant distress;

- In issues of a highly sensitive nature;
- Cases involving an ongoing threat of disruption to the LSE community or to the School's activities.

20. In considering what precautionary measures will be taken, the School will consider amongst other factors, the nature of the misconduct committed, the circumstances of the individuals involved, the views of the police and any input from witnesses. Precautionary measures can include, but are not limited to:

- Excluding the Alumnus/na from areas/facilities of the School;
- Removing the Alumnus/na from receiving all communications from the School;
- Termination or suspension of alumni privileges or access rights, events and/or activities for a fixed or permanent period;
- Placing certain condition (s) and/or restriction (s) on the alumnus/na such as having no contact, or restricted contact, with a specified person or persons.
- 21. A risk assessment will be carried out by the Harassment Management Group (which would include individuals on a need-to-know basis) and a decision on precautionary measures will be sent by the Chair of that group or their Nominee to the Alumnus/na. An Alumnus/na who is affected by any proposed measure/s may appeal in writing to a nominated member of the School's Management Committee. A member of the School's Management Committee or their Nominee will normally respond to the appeal within five (5) working days.

#### **Types of Misconduct**

- 22. The following list is indicative (but not exhaustive) of the type of offences which would constitute misconduct:
  - 22.1 engagement in any act that will, or is likely to, disrupt teaching, study, research or administrative work of the School;
  - 22.2 failure to comply with the reasonable instructions provided by the School or by any individual or body authorised to act on behalf of the School;
  - 22.3 cause, or threaten to cause, injury to, or endanger the safety of, a member of the LSE Community, including but not limited to members of staff, students, visitors or other third parties;
  - 22.4 dishonest behaviour and/or fraudulent actions, which include submitting incorrect or misleading information to the School;
  - 22.5 engagement in any form of conduct or communication, including

that on social media, that can reasonably be considered to be abusive, bullying or harassment of students, members of staff, any other member of the School community and/or any visitor to the School as it is defined by the School's Discrimination, Harassment and Bullying Policy and the Sexual Harassment and Sexual Violence Policy; 22.6 engagement in any act that will, or is likely to, damage or deface property of the School;

- 22.7 cause a Health and Safety concern which includes failure to comply with School or UK government guidance;
- 22.8 engagement in any conduct or communication that will, or is likely to, bring the School into disrepute or unjustifiably harm the reputation of a member of it;
- 22.9 breach of one or more of the School's terms or conditions, policies or procedures, or rules and regulations, which includes but is not limited to the Discrimination, Harassment and Bullying Policy, the School's Ethics Code and any penalties or measures that have been put in place under the School's Alumni Misconduct Procedure or any other procedure;
- 22.10 commitment of a criminal act(s) which may or may not be punished in a court of law, and/or an alleged breach of discipline, which occurs on or off any of the premises that the School owns, or in any way administers (including on social media) where the alleged victim is the School itself, a student or member of staff of the School or others, including but not limited to: those visiting, working or studying at the School, and to alleged misconduct occurring during School approved and authorised activities. For the avoidance of doubt, the School may also consider third party allegations made against an Alumnus/na that is raised formally with it and where the School assesses there may be a risk to other members of the LSE community;
- 22.11 use of any of the School's facilities improperly and/or breach the Conditions of Use of IT Facilities at the School;
- 22.12 use of the School's name or address in a public statement, or business or other venture, without obtaining the permission of the School;
- 22.13 use of any of the School's registered trademarks without seeking permission from a relevant person in the School's central administration;
- 22.14 recording a lecture, meeting or other LSE event, or use such a recording, without the permission of the lecturer or person or group who organised the event;
- 22.15 breach of the Data Protection Act 2018, UK GDPR, or the General Data Protection Regulation (GDPR) (2016/679).

#### **Informal Resolution**

- 23. Informal resolutions can be made for minor disciplinary misconduct and are intended to be flexible with the aim of resolving matters as quickly and amicably as possible, and where possible normally within fifteen (15) working days from the alleged misconduct having been raised. As such, if an individual(s) of the School believes that an Alumnus/na or group of alumni of the School has acted in a way that warrants investigation under this Procedure they should first consider contacting the relevant Alumni or Programme Manager or submit a Report + Support form as soon as they become aware of the alleged misconduct. Any excessive delay may impact on the subsequent consideration of the case.
- 24. The relevant Alumni or Programme Manager will decide whether it is reasonable and proportionate to resolve a case informally, and, if so, how. In some cases, the relevant Manager may consider mediation or conciliation. If considered appropriate, s/he may refer the case to the Head of Alumni Engagement to consider (where the alleged misconduct involves major misconduct and is considered to be high risk). The Head of Alumni Engagement will first look to resolve the matter informally if possible, or may decide to refer the matter to the School Secretary to resolve under the formal Resolution stage of this Procedure and/or to ask whether the Police should be alerted to the case.
- 25. The Alumnus/na will be informed of the allegation (s) against them and how their behaviour has breached expected standards and the Alumnus/na will be given a reasonable opportunity to respond to the allegation(s).
- 26. The Alumni or Programme Manager will consider whether it is necessary to ask an Alumnus/na not to attend part or all of the premises, or use particular facilities, of the School if s/he considers it to be in the interests of one or more of the parties involved in a case, or the wider LSE community, while the informal resolution stage is ongoing. If the Alumnus/na objects to, or fails to cooperate with such a request, the Head of Alumni Engagement or their Nominee will consider referring the case to the School Secretary under the formal stage of this Procedure.
- 27. The Alumni or Programme Manager, or Head of Alumni Engagement (whoever carried out the investigation) will produce a report confirming the action/s taken to resolve a case informally and the outcome (including possible penalty as outlined in Appendix C) and will disclose a copy of this report to the Alumnus/na/s and/or member/s of staff directly involved in the

- case and the reporting party may be made aware of the outcome where applicable.
- 28. This report, either in full or any aspect of it, will be recorded on an Alumnus/na's record.
- 29. If the reported Alumnus/na fails to co-operate in an attempt at informal resolution, this may be considered as grounds for initiating the formal stage of this Procedure and may also be taken into account as part of the formal investigation.
- 30. Multiple or repeated incidents of misconduct may be treated as being more serious than a single act of misconduct and previous findings may be taken into account when considering which penalty should apply. This may also result in escalation to the formal procedure.
- 31. If the allegation against the Alumnus/na's was misconduct and an appropriate penalty applied and communicated to the Alumnus/na, then the Alumnus/na will have the right to appeal to the Deputy Director of Operations, Philanthropy and Global Engagement (PAGE), or their Nominee within ten (10) working days.
- 32. An Appeal must normally be made on one or more of the following grounds:
  - 32.1. A significant procedural flaw or irregularity that compromised the fairness of the process;
  - 32.2. New material evidence, which must be supported by an explanation of why it is being submitted at this late stage;
  - 32.3. An outcome being unreasonable or disproportionate;
  - 32.4. That there is bias or a reasonable perception of bias during the procedure.
- 33. The Deputy Director of Operations (PAGE) or their Nominee (which may include but is not limited to an LSE Service leader) will normally complete their paper-based review within twenty-one (21) working days from receiving the Appeal. If an appeal is received after the deadline for submitting an appeal or a request is made for an extension, then the Alumnus/na will be asked to provide good reasons why the appeal is late/need for an extension. A decision of the validity of the reason provided will be made by the Deputy Director of Operations or their Nominee. If the reason provided is considered not a good reason, the appeal will not be considered, and the Alumnus/na will be given a decision letter. In determining an appeal of a decision by the Head of Alumni Engagement, they may confirm, amend or overturn the outcome imposed by the Alumni or Programme Manager, or Head of Alumni

Engagement or their Nominee. The Deputy Director of Operations or their Nominee may also decide that the matter be re-considered. They will convey their decision in writing to the Alumnus/na.

#### **Formal Resolution**

- 34. The School Secretary is responsible for deciding whether to resolve a case formally, regardless of how the matter is brought to their attention, and, if so, how. The Secretary will also consider whether to alert the Police. The Alleged Misconduct Form at Appendix A should be used by anyone wishing to raise an alleged misconduct issue to the Secretary under this Procedure.
- 35. The Secretary may ask a relevant member of staff (their "Nominee") who has had no prior involvement in the case, to conduct an investigation, although the Secretary will make the final decision on the case based on their consideration of the findings of the Nominee's investigation.
- 36. The form of any investigation will depend on a number of factors, such as the severity and complexity of the issue in question as well as the availability of evidence. However, the Secretary or their Nominee must ensure that any investigation is conducted fairly and is of a reasonable level in depth and scope.
- 37. The Alumnus/na subject to an allegation ('the Alumnus/na') will be given an opportunity to present their case to the person conducting the investigation and respond to any allegations made against them. In certain circumstances, for example, when an Alumnus/na's whereabouts are not known at the time of investigation, or if they are not engaging in the process or where there may be sufficient evidence to proceed without meeting the Alumnus/na (if the Alumnus/na is not engaging in the process), then the Secretary or their Nominee may decide to conduct the investigation in the Alumnus/na's absence.
- 38. The Secretary or their Nominee may talk to other members of staff, students or members of the LSE community (where applicable) and consider documents and other evidence as part of their investigation.
- 39. The School will normally endeavour to complete the informal resolution stage (if applicable) and formal resolution stage of the process within ninety (90) days of the allegation being made. In some cases, for example where the case is complex, where the Alumnus/na and/or witnesses are unable to attend meetings, where proceedings are put on hold because of criminal investigation or where a student has impending assessments, we may need to extend this deadline and in these circumstances the Secretary or their

Nominee will inform the Alumnus/na involved of any delay, and the reason/s for the delay and when the investigation is likely to conclude, as soon as possible.

#### Outcome of a Formal Resolution

- 40. At the end of a formal investigation, the Secretary will decide whether to:
  - 40.1 Dismiss the allegation;
  - 40.2 Uphold the allegation and determine an outcome that is relevant and proportionate to the offence/s.
- 41. The Secretary will find an allegation of misconduct proven if it is considered that the evidence identifies, on a balance of probabilities that misconduct has occurred.
- 42. When deciding on the appropriate penalty to be applied in cases of proven misconduct, the Secretary will give due consideration to the following:
  - 42.1 The Alumnus/na's previous record;
  - 42.2 Any other mitigating factors, as applicable.
- 43. The Secretary will take into consideration the table set out at Appendix C which outlines the types of misconduct and possible penalties the Secretary may put in place. This includes but is not limited to:
  - 43.1 Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the School/use of relevant online services for a specified period;
  - 43.2 Termination or suspension (or part suspension) of alumni privileges or access rights, events and/or activities for a fixed or permanent period;
  - 43.3 Imposing conditions or restrictions on an Alumnus/na's access to facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes; 43.4 A formal warning to be noted on the Alumnus/na's record, any
  - 43.4 A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
  - 43.5 Require the Alumnus/na to make a formal written apology;
  - 43.6 Requirement to return property in the same condition it was taken repay/make good any financial loss to the School;
  - 43.7 Require the Alumnus/na to take appropriate training;

- 44. The Secretary or their Nominee has the discretion to decide on a combination of penalties and will convey their decision and the reason/s for it, in writing to the Alumnus/na. The Secretary or their Nominee will also convey their decision to member/s of staff of the School who have been directly involved in the case or any other member of staff where it is considered reasonable and appropriate to do so. They may also inform a reporting party about the outcome where reasonable and proportionate to do so.
- 45. The Secretary's written response must inform the Alumnus/na of their right to an Appeal to a Member of the School's Management Committee (see the "Appeal" section below).

#### **Appeal**

- 46. An Appeal against the Secretary's decision must be made using the Appeal Form set out at Appendix B, no later than ten (10) working days from the date of the Secretary's written decision. If an appeal is received after the deadline for submitting an appeal/or a request for an extension is made, then the Alumnus/na will be asked to provide good reasons why the appeal is late/the need for an extension. A decision of the validity of the reason provided will be made by the relevant member of the School Management Committee. If the reason provided is considered not a good reason, the appeal will not be considered, and the Secretary's decision will be final.
- 47. An Appeal must normally be made on one or more of the following grounds:
  - 47.1. A significant procedural flaw or irregularity that compromised the fairness of the process;
  - 47.2. New material evidence, which must be supported by an explanation of why it is being submitted at this late stage; and
  - 47.3 An outcome being unreasonable or disproportionate.
  - 47.4 That there is bias or a reasonable perception of bias during the procedure.
- 48. The member of the School Management Committee will do a paper-based review of the decision. For the avoidance of doubt, an appeal may be automatically dismissed if it is not made in accordance with the grounds set out in Section 47 of this Procedure.
- 49. The member of the School Management Committee will normally complete their review within twenty-one (21) working days of receiving the

Appeal. In determining an appeal of a decision by the Secretary, they may confirm, amend or overturn the outcome imposed by the Secretary. The member of the School Management Committee may refer the case back to the formal stage for reconsideration. They will convey their decision in writing to the Alumnus/na.

- 50. The letter will contain the decision and the reasons for it. The letter will also confirm any course of action or penalty, which may differ to the outcome of the original investigation.
- 51. The Secretary's Division will inform the Philanthropy and Global Engagement Division of the outcome in order for any penalties (if applicable) to be implemented. Information on the Alumnus/na's misconduct offence and any penalty imposed will be included on the Alumnus/na's record held by the Philanthropy and Global Engagement Division in line with the Alumni Privacy Notice. Information relating to any matter of misconduct shall be kept confidential and will only be shared with other relevant members of School staff where it is strictly necessary on a need-to-know basis in order to investigate and/or determine an outcome of an alleged breach of discipline, dealing with any complaint arising out of it and/or implementing any sanctions or measures following a decision.
- 52. In certain circumstances, prior to a student becoming an alumnus/na, they may have been investigated for misconduct under the School's Disciplinary Procedure for Students. Any such decision in relation to a disciplinary matter carried out whilst the individual is a student may also include a decision on that individual's alumni privileges and access rights. The Secretary's Division will inform the Philanthropy and Global Engagement Division of any decision which will impact the individual's alumni privileges and access rights in order for them to implement that decision as set out in Section 51 of this Procedure.

End.

#### **APPENDIX A: ALLEGED MISCONDUCT FORM**

You can make a report via Report + Support or alternatively complete and submit the following form:

Alumni ID	
Last Name	
First Name	
Contact Details	
(Email/Telephone)	
Date of incident	
Type of Misconduct	
[When completing this please choose from one or more of the categories of misconduct found at section 22/Appendix C of this Procedure and/or add the specific misconduct as defined in the Discrimination, Harassment and Bullying procedure (where it relates to Discrimination, Harassment and Bullying) or the Sexual Harassment and Sexual Violence Policy (where it relates to Sexual Harassment and Sexual Violence) or in any other relevant policy, which may be applicable 1	

# Summary of alleged misconduct [This should include what the incident is that is referred to, where the incident happened, the parties involved, the basis of the alleged misconduct and, where appropriate, the outcome sought.]

Signed: Date:

#### **APPENDIX B: APPEAL FORM**

# APPEAL AGAINST THE DECISION OR OUTCOME OF A DISCIPLINARY INVESTIGATION

Alumni ID	
Last Name	
First Name	
Contact Details	
(Email/Telephone)	
Date of incident	
Date decision was received	
Summary of grounds for	
Appeal	
[This should include what is	
being challenged (e.g., the	
decision or measures put in	
place as a result of the	
decision). This should also set	
out the grounds for the appeal	
found at section 47 (e.g.,	
procedural error in the formal	
investigation or new evidence).	
You should also include a copy	
of the Secretary/Board of	
Discipline's decision and any	
relevant evidence (e.g., emails	
or medical report/s), as well as	
explain why any new evidence is	
being presented at this late	
stage of the procedure.]	

Signed:

Date:

## APPENDIX C: TABLE OF TYPES OF MISCONDUCT AND POSSIBLE PENALTIES

#### PLEASE NOTE:

The following table sets out examples of misconduct which may fall under the various types of misconduct outlined under section 22 of this Procedure and the corresponding penalties which are non-exhaustive. The possible penalties that may be applied if a specific misconduct occurs is illustrative only i.e., there will be cases where certain behaviours which would usually be considered major breaches of discipline are minor and will require a less serious penalty and vice versa. In addition, several types of misconduct may apply to a same example.

## TYPES OF MISCONDUCT Physical Misconduct/Violence

and Anti-social behaviour:

# Usually this would fall within one or more misconduct types found at Section 22.3, 22.5 and 22.9 of

#### Major:

Punching

this Procedure.

- Slapping
- Biting
- Kicking
- Pulling hair
- Alcohol misuse related offences

#### Minor:

- Pushing
- Shoving
- Kicking
- Pulling hair
- Alcohol misuse related offences

#### **POSSIBLE PENALTIES**

- Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the School/use of relevant online services for a specified period;
- Termination or suspension (or part suspension) of alumni privileges or access rights, events and/or activities for a fixed or permanent period;
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology.

- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology;
- Imposing conditions or restrictions on an Alumnus/na's access to facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes.

#### **Sexual Misconduct:**

Usually this would fall within one or more misconduct types found at Sections 22.5, 22.9 of this Procedure.

#### Major:

- Sexual intercourse or engaging in a sexual act without consent;
- Domestic abuse;
- Attempting to engage in sexual intercourse or engaging in a sexual act without consent;
- Sharing (including on social media) private sexual materials of another person without consent;
- Kissing without consent;
- Touching inappropriately through clothes without consent;

- Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the School/use of relevant online services for a specified period;
- Termination or suspension (or part suspension) of alumni privileges or access rights, events and/or activities for a fixed or permanent period;
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;

- Showing sexual organs to another individual;
- Stalking another individual.

#### Minor:

 Making unwanted remarks of a sexual nature.

- Require the Alumnus/na to make a formal written apology;
- Require the Alumnus/na to take appropriate training.
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology;
- Imposing conditions or restrictions on an Alumnus/na's access to facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes.

# Harassment and Bullying Behaviour/hate incident or crime:

Usually, this would fall within one or more misconduct types found at Sections 22.3, 22.5, 22.10 of this Procedure.

#### Major:

 Abusive comments relating to an individual's sex, sexual orientation, religion or belief, race, pregnancy/maternity, marriage/civil partnership, gender reassignment, disability or age made in person or via social media;

- Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the School/use of relevant online services for a specified period;
- Termination or suspension (or part suspension) of alumni privileges or access rights, events

- Threats to hurt another person; Acting in an intimidating and hostile manner;
- Stalking another individual/group of individuals;
- Hate incident/crime.

#### Minor:

- Use of inappropriate language/abusive comments made in person or via social media;
- Repeatedly contacting another person (by phone, email, text or on social networking sites) against the wishes of the other person;
- Acting in an intimidating and hostile manner;
- Making a threat to another individual;
- Stalking another individual/group of individuals.

- and/or activities for a fixed or permanent period;
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology;
- Require the Alumnus/na to take appropriate training.
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology;
- Imposing conditions or restrictions on an Alumnus/na's access to facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes.

#### **Damage to Property:**

Usually, this would fall within one or more misconduct types found at Section 22.6, 22.10 of this Procedure.

#### Major:

 Causing significant damage to the School property or  Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the property of other students, employees and/or visitor of the School.

#### Minor:

 Causing minor damage to the School property, the property of other students, employees and/or visitor of the School.

- the School/use of relevant online services for a specified period;
- Termination or suspension (or part suspension) of alumni privileges or access rights, events and/or activities for a fixed or permanent period;
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology;
- Requirement to return property in the same condition it was taken repay/make good any financial loss to the School.
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Requirement to return property in the same condition it was taken repay/make good any financial loss to the School
- Require the Alumnus/na to make a formal written apology;
- Imposing conditions or restrictions on an Alumnus/na's access to

# Unauthorised Use of taking of Property:

Usually, this would fall within one or more misconduct types found at Sections 22.11, 22.12 and 22.13 of this Procedure.

#### Major:

- Unauthorised entry onto or unauthorised use of School Premises. This includes Halls of Residences;
- Taking property belonging to the School, another student, employee of the School and/or visitor of the School without permission;
- Misuse of School property including computer equipment;
- Internet access abuse, such as visiting inappropriate websites, uploading/downloading inappropriate content, propagation of computer viruses.

#### Minor:

- Misuse of School property including computer equipment;
- Unauthorised entry onto or unauthorised use of School Premises. This includes Halls of Residences;

- facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes.
- Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the School/use of relevant online services for a specified period;
- Termination or suspension (or part suspension) of alumni privileges or access rights, events and/or activities for a fixed or permanent period;
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Requirement to return property in the same condition it was taken repay/make good any financial loss to the School.
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;

- Using the School's name, address or trademarks without the Permission of the School.
- Require the Alumnus/na to make a formal written apology;
- Imposing conditions or restrictions on an Alumnus/na's access to facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes.

# Causing a Health or Safety Concern/possession and use of illegal substances and/or items:

Usually, this would fall within one or more misconduct types found at Sections 22.3 and 22.7 of this Procedure.

#### Major:

- Act/omission that did cause or could have caused serious harm on the School Premises or during School activities (outside of School Premises);
- Setting off fire alarms or obstructing access to buildings or rooms;
- Anti-social behaviour resulting from drug or alcohol misuse;
- Being in possession and use of illegal items on School Premises or during School activities/events.

#### Minor:

 Act/omission that did cause or could have caused a health and safety concern

- Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the School/use of relevant online services for a specified period;
- Termination or suspension (or part suspension) of alumni privileges or access rights, events and/or activities for a fixed or permanent period;
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology.
- A formal warning to be noted on the Alumnus/na's record, any

- on School premises or during School activities (outside of the School Premises);
- Anti-social behaviour resulting from drug or alcohol misuse;
- Setting off fire alarms or obstructing access to buildings or rooms.

- future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology;
- Imposing conditions or restrictions on an Alumnus/na's access to facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes.

#### **Operational Obstruction:**

Usually this would fall within one or more misconduct types found at Sections 22.1, 22.2, 22.3 22.4, 22.5, 22.6, 22.9, 22.10, 22.14 and 22.15 of this Procedure.

#### Major:

- Acts/omissions/statements intended to deceive the School. Committing fraud;
- Submitting or relying on forged, falsified or fraudulent documentation and other forms of deception that are intended to gain an advantage for example submitting fraudulent, mitigating circumstances/claims or falsifying evidence in support of mitigating circumstances claims; • Disruption of the activities of the School (including academic, administrative, sporting and social) on
- Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the School/use of relevant online services for a specified period;
- Termination or suspension (or part suspension) of alumni privileges or access rights, events and/or activities for a fixed or permanent period;
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology.

- School Premises or elsewhere:
- Disruption of the functions, duties or activities of any other student, employee or visitor of the School;
- Breach of the relevant data protection legislation.

#### Minor:

- Improper interference with the activities of the School on the School premises or elsewhere;
- Improper interference with the functions, duties or activities of any other student, employee or authorised visitor of the School;
- Recording a meeting or other School event, or use such a recording, without the permission of the person or group who organised the event.

- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology;
- Imposing conditions or restrictions on an Alumnus/na's access to facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes.

#### Reputational Damage:

Usually this would fall under the misconduct types found at Sections 22.4 and 22.8 of this Procedure.

#### Major:

 Behaviour which has caused serious damage or could have caused serious damage to the reputation of the School.

#### Minor:

 Behaviour which has damaged or could have

- Permanent or temporary exclusion/ban or partial exclusion from access rights to and from all LSE buildings and Premises that are owned or leased by LSE (including halls of residences), or defined areas and/or facilities of the School/use of relevant online services for a specified period;
- Termination or suspension (or part suspension) of alumni privileges or access rights, events and/or activities for a fixed or permanent period;

damaged the reputation of	
the School.	

- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- A formal warning to be noted on the Alumnus/na's record, any future proven misconduct will take such warning into account;
- Require the Alumnus/na to make a formal written apology;
- Imposing conditions or restrictions on an Alumnus/na's access to facilities where such conditions are deemed necessary for the safety and security of members of the School or for reputational purposes.

#### APPENDIX D: ALUMNI MISCONDUCT PROCEDURE FLOW CHART

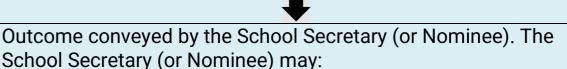
Is it an Alumnus/na of the School? If not, we may have to advise that this matter be resolved in an alternative way.



Informal Resolution – Contact the relevant Alumni or Programme Manager from the Alumni Engagement Team to consider an informal resolution in cases of minor misconduct. The Alumnus/na will be provided with an outcome and a right of appeal to the Deputy Director of Operations (PAGE) or their Nominee. If the case is not suitable for consideration informally then it will be considered under the formal resolution stage and flagged to the Head of Alumni Engagement.



Formal Resolution – the School Secretary (or Nominee) will decide if a case will be considered for investigation and formal resolution. In certain cases, the School will need to consider taking precautionary measures against an Alumnus/na, and a Harassment Management Group will need to be triggered.



- 1. Dismiss the allegation;
- 3. Uphold the allegation and determine an outcome that is relevant and proportionate to the offence/s.



If dissatisfied with the School Secretary's (Nominee) decision, the Alumnus/na can lodge an appeal to a specified member of the School's Executive Committee within 10 working days of receipt of the decision.



An appeal may only be requested if one or more of the following Grounds of Appeal

- 1. A significant procedural flaw or irregularity that compromised the fairness of the process;
- 2. New material evidence, which must be supported by an explanation of why it is being submitted at this late stage; and
- 3. An outcome being unreasonable or disproportionate.
- 4. There is bias or reasonable perception of bias during the procedure.

The relevant member of the School Management Committee will make a decision within 28 days of receipt of an appeal. They may confirm, amend or dismiss the penalty imposed by the Secretary A decision Letter will be issued.

#### **APPENDIX E: PRIVILEGES AND ACCESS RIGHTS**

The support and services provided to alumni by the School are provided on a discretionary basis and The Philanthropy and Global Engagement Division reserves the right to remove, suspend or limit privileges and access rights, including those provided to alumni groups, if it deems that the relevant School's terms and conditions have been breached.

Privileges and access rights provided to alumni include but are not limited to:

Privileges	Invitations to events; Membership of Alumni Associations or networks (local and international); Alumni discounts on online courses, Executive Education,
	Summer School, and the Language Centre; Eligibility to register to online services including but not limited to an LSE alumni email address, and online library
	access; LSE Careers support (for graduates up to five years out)
Access	Eligibility for an Alumni Campus Card to grant access to: Alumni Centre; LSE Library and selected resources; Gen Den: LSE Premises that are owned or leased by LSE.

## APPENDIX F -INTERNAL AND EXTERNAL CONTACTS AND SOURCES OF Support

- Head of Alumni Engagement, Alumni Engagement and Volunteering Manager, Regional and Thematic Leads, Alumni Networks Manager, Alumni and Supporter Experience Manager, Alumni Engagement Projects Manager: can all be contacted via <u>alumni@lse.ac.uk</u>.
- The Alumni Association Leadership in accordance with the <u>Alumni</u> <u>Association byelaws</u> if it involves a Committee Leader.

You can also contact the Senior Legal Counsel, Refel Ismail at: <a href="mail@lse.ac.uk">r.ismail@lse.ac.uk</a>, Head of the School's Legal Team, Kevin Haynes at: <a href="mail@lse.ac.uk">k.j.haynes@lse.ac.uk</a>, or Legal Counsel, Mariachiara Valsecchi at <a href="mail@lse.ac.uk">m.valsecchi1@lse.ac.uk</a> if you would like advice on this Procedure.

#### Report It Stop It

Bullying and harassment can be reported using <u>LSE's dedicated online form</u>. The report will be treated confidentially and followed up promptly and fairly.

#### **External Contacts:**

- Ask the Police
- <u>Citizens Advice Bureau</u> (rights and responsibilities)
- <u>Crimestoppers</u> (reporting crime)
- Equality Advisory and Support Service
- Metropolitan Police
- NHS 111 (non-emergency service)
- <u>Samaritans</u> (08457 909090 / 020 7734 2800)
- Stop Hate UK (all forms of hate crime and discrimination)
- <u>Victim Support</u> (victims of crime)
- National Stalking Helpline (support for anyone experiencing stalking)
- <u>National Domestic Abuse Helpline</u>: Women and children: 0808 2000 247

- Rape Crisis (rape and sexual abuse)
- Solace Women's Aid (0808 802 5565 / advice@solacewomensaid.org)
- Women's Aid
- Refuge (support for women and children who have experienced domestic abuse)
- <u>The Havens</u> (London-based support for survivors of recent rapes/sexual assaults for all genders)
- Rights of Women (free and confidential legal advice for women)
- National Domestic Abuse Helpline: Men: 0808 801 0327
- Survivors UK (male victims of rape and sexual abuse)
- Mankind (support for men who have been sexually abused)
- Men's advice line (support for men experiencing domestic violence)
- NAPAC (support for survivors of childhood sexual abuse for all genders)
- Ashiana (Asian women's refuge)
- The Monitoring Group (racial harassment and abuse)
- Southall Black Sisters (BME women's rights and advice)
- <u>Imkaan</u> (provides full list of organisations supporting BAME women survivors of sexual and domestic violence)
- Galop (LGBT+ anti-violence charity)
- <u>Switchboard</u> (LGBT+ helpline)
- <u>TransUnite</u> (find a trans support group near you)
- Mind (mental health)
- Respond (support for children and adults with learning disabilities who have experienced abuse and/or trauma for all genders)
- <u>DeafHope</u> (support for Deaf people experiencing domestic abuse)
- <u>Stay Safe East</u> (supporting Deaf and disabled survivors of hate crime, domestic and sexual abuse in Waltham Forest and Newnham areas of London only)
- <u>Karma Nirvana</u> (supporting victims of honour-based abuse and forced marriage)
- Forced Marriage 020 7008 0151 (emergencies)
- <u>Muslim Women's Network</u> (support for Muslim women experiencing or at risk of abuse)
- <u>True Vision</u> (all hate crimes)
- <u>Tell Mama</u> (anti-Muslim hate crime)
- Community Security Trust (anti-Semitic hate crime)
- Drugs and Me: <u>The Home of Harm Reduction (drugsand.me)</u>
- Know the score: Find Out About Drugs Know the Score 34

- Talk to Frank: <a href="https://www.talktofrank.com/">https://www.talktofrank.com/</a>
- NHS Drug Addiction: Getting help: <a href="https://www.nhs.uk/live-well/addiction-support/drug-addiction-getting-help/">https://www.nhs.uk/live-well/addiction-support/drug-addiction-getting-help/</a>
- Drugwise: <a href="https://www.drugwise.org.uk">https://www.drugwise.org.uk</a>
- The Mix: essential support for under 25's: https://www.themix.org.uk/drink-and-drugs
- Alcohol Change UK: <u>Alcohol harms. Time for change.</u> | <u>Alcohol Change</u>
   <u>UK</u>
- NHS Alcohol Support: <a href="https://www.nhs.uk/live-well/alcohol-support/">https://www.nhs.uk/live-well/alcohol-support/</a>
- Drinkaware: <a href="https://www.drinkaware.co.uk/tools/track-and-calculate-units-app">https://www.drinkaware.co.uk/tools/track-and-calculate-units-app</a>

#### **Review Schedule**

Review interval	Next review date	Next review start
3 years	1 July 2026	1 April 2026

#### **Version history**

Version	Date	Approved by	Notes
1	26 October	Harassment and	
	2023	Safeguarding	
		Forum	

#### Links

Related Policies/Procedures	Link
The Discrimination, Harassment	https://info.lse.ac.uk/staff/servi
and Bullying Policy	ces/Policies-and-
	procedures/Assets/Documents
	<u>/harPol.pdf</u>
Sexual Harassment and Sexual	https://info.lse.ac.uk/staff/servi
Violence Policy	ces/Policies-and-
	procedures/Assets/Documents
	/harVioPol.pdf
Disciplinary Procedure for	disProStu.pdf (lse.ac.uk)
Students	
LSE Ethics Code	https://info.lse.ac.uk/staff/divis
	ions/Secretarys-
	<u>Division/Ethics/Ethics-Code</u>
Advice for Alumni Volunteers	https://www.lse.ac.uk/alumni-
	friends-and-
	partners/volunteer/advice-for-
	<u>alumni-volunteers</u>
Alumni Centre Usage Policy	https://www.alumni.lse.ac.uk/al
	umni-centre-usage-policy

#### **Contacts**

Position Name En	nail	Notes
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Head of Legal	Kevin Haynes	k.j.haynes@lse.ac.u k	
Senior Legal Counsel	Refel Ismail	r.ismail@lse.ac.uk	Author
Legal Counsel	Mariachiara Valsecchi	m.valsecchi1@lse.a c.uk	
Head of Alumni Engagement	Ceri Jones	c.jones13@lse.ac.uk w.c.spence@lse.ac.	Author
Alumni Engagement Projects Manager	Wallis Spence	<u>uk</u>	
Deputy Director of Philanthropy and Global Engagement Operations	Malina Szreter	m.k.szreter@lse.ac. uk	

#### **Incident Reporting**

Any incidents or near misses relevant to this document should be escalated based on the level of impact outlined in the School's Risk Procedure. Escalation scales follow below.

Rating	Board Oversig	ght Management	Oversight
Severe	R	Reported to Audit and	Managed by
	C	Council	Chief Operating
			Officer
High	R	Reported to SMC	Reported to
			Chief Operating
			Officer
Medium	R	Reported to Management	Reported to
	В	Board	Professional

Service Leader

#### **Communication and Training**

Will this document be	Yes
publicised through Internal	
Communications?	
Will training needs arise from	Yes
this policy	

If Yes, please give details:

Training will be required for all those involved at various stages of the disciplinary process, primarily to the Alumni Engagement Team for handling informal resolutions.

This is to include unconscious bias training.