



The Discrimination, Harassment and Bullying Policy

Contents

1. Policy Statement.....	2
2. Scope of this Policy	2
3. Responsibility of the LSE Community.....	4
4. Definitions	4
Discrimination.....	4
Harassment	7
Victimisation	8
Bullying.....	8
Stalking	8
Hate Incidents and Hate Crime	8
5. Harassment and bullying via the internet and/or email and Social media sites.....	9
6. Action against discrimination, harassment, victimisation and bullying	9
7. Confidentiality and Data Protection.....	12
8. Monitoring of Cases	12
APPENDIX 1- EXAMPLES	13
APPENDIX 2 –INTERNAL AND EXTERNAL CONTACTS AND SOURCES OF SUPPORT.....	22
APPENDIX 3-LEGISLATION	26

1. Policy Statement

- 1.1 The School is committed to a working and learning environment where people can achieve their full potential free from any form of discrimination, harassment or bullying and is committed to providing an inclusive culture of equality, diversity and respect between individuals.
- 1.2 This Policy outlines the School's vision in creating and maintaining a healthy environment where its members are confident that any complaints raised by them in relation to any form of discrimination, harassment and bullying will be dealt with fairly, diligently and promptly. It is also committed to providing a supportive culture which encourages the reporting of such incidents/behaviour and early intervention.
- 1.3 The School recognises the need to challenge any tacit or explicit acceptance of discrimination, harassment or bullying in order to prevent escalation and is therefore dedicated to focusing on initiatives that will work to prevent such unacceptable behaviour arising. This includes working to improve the understanding of discrimination, harassment and bullying across the School's community to prevent future such behaviour from occurring as well as taking steps to understand the nature and extent of discrimination, harassment and bullying experienced by members of the LSE community on its premises that goes unreported.
- 1.4 Appropriate steps will be taken to deal with behaviour, intentional or unintentional, that results in a breach of this Policy and the School's procedures make provision for the investigation of allegations made and for disciplinary action to be taken where allegations are upheld.
- 1.4 The School is also committed to protecting and promoting freedom of speech within the law and as such this Discrimination, Harassment and Bullying Policy operates in accordance with the School's Code of Practice on Free Speech. The School is also committed to academic freedom and critical analysis within the law, for academic staff to be able to question, challenge and debate new ideas and opinions. There are instances where this may be limited by law where it is necessary to prevent crime, for national security purposes, public safety or to prevent unlawful discrimination and harassment. The School's Code of Practice on free speech can be found at:
<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/Code-of-Practice-on-Free-Speech.pdf>
- 1.6 For the purposes of this Policy, references to 'the LSE community' includes but is not limited to all salaried and non-salaried members of staff (including visiting staff), students and members of council and other members of the School including all those individuals authorised to be on School Premises for the purposes of work or study.

2. Scope of this Policy

- 2.1 The School will not tolerate any form of discrimination, harassment or bullying within its community or against its members, including but not limited to that which takes place beyond the physical premises and normal business hours of the School, such as conduct at School events, social events related to work or studies, trips abroad and/or on social media. For the avoidance of doubt, this Policy will apply to any such behaviour arising abroad and in relation to the School's overseas

activities.

2.2 It also applies to members of the LSE community who may be working remotely and engaging with others remotely via an online platform. The way individuals within the LSE community work or study has become more diversified over time. Members of the LSE community may be working or studying remotely within their home environment where all communication takes place on an online platform. As such, any discrimination, harassment and bullying via online platforms can make individuals feel more exposed or vulnerable. The impact on an individual may be amplified where their home and work life seem to merge into one and where there is no physical distance between the two. In such circumstances, the School will take reasonable steps to eliminate discrimination, harassment and bullying and other unacceptable behaviour set out in this Policy which may occur and which may be more magnified within the remote working/learning environment.

2.3 This Policy applies to any behaviour as set out in this Policy perpetrated by students, members of staff, members of council against other students, members of staff, members of Council. It also applies to behaviour committed against any other third party (including but not limited to contractors, alumni, visitors, job/student applicants) where it occurs on premises and/or where third party contact is made in relation to work/study purposes.

The above list is not exhaustive and may also include unacceptable behaviour being perpetrated by any other party who is required by the School to abide by this Policy. The School will also take reasonable steps to prevent any third party harassment (e.g. from a visitor, supplier, member of the public) that may occur against a member of the LSE Community.

For the avoidance of doubt, behaviour that may constitute direct discrimination, indirect discrimination and discrimination arising from a disability would normally only be considered as being carried out by the Employer/Provider (the School), a member of staff or a member of Council.

2.4 The School may also consider third party allegations and/or historic allegations of discrimination, harassment, bullying and victimisation against a member of the LSE Community that is raised formally with it and where the School assesses that there may be a continued risk to other members of the LSE community. Where possible, reasonable attempts will be made to obtain relevant information to determine an appropriate response.

2.5 The School's Sexual Harassment and Sexual Violence Policy is intended to cover instances of harassment and/or violence of a sexual nature. In the event of a conflict between this discrimination, harassment and bullying policy and the Sexual Harassment and Sexual Violence Policy, the terms of the latter policy will prevail.

2.6 This Policy consists of and includes an:

- Appendix 1 which provides examples on the various types of discrimination, harassment, bullying and victimisation amongst other forms of unacceptable behaviour defined under this Policy;
- Appendix 2 which outlines Internal and external contacts and Sources of Support and;
- Appendix 3 which sets out the legislation.

3. Responsibility of the LSE Community

3.1 All members of the LSE community should help to:

- prevent discrimination, harassment and bullying by being sensitive to the reactions and needs of others, and ensuring that their conduct does not cause offence;
- discourage discrimination, harassment and bullying by others by making it clear that such conduct is unacceptable, and supporting colleagues and peers who are taking steps to stop it;
- understand what constitutes discrimination, harassment and bullying by attending training sessions and/or seeking advice from the School's central administration.

3.2 The School is responsible for:

- taking reasonable steps to eliminate discrimination, bullying and harassment as well as to actively promote equality to provide a collegiate and harmonious working environment;
- taking appropriate action and early intervention when it is aware that discrimination, harassment and bullying may be or is taking place;
- Implementing training of members of staff in relation to discrimination, harassment and bullying
- raising awareness to help members of the LSE Community identify and deal with discrimination, harassment and bullying.

3.3 All line managers and others with positions of responsibility have an additional obligation to ensure that this Policy is implemented, to promote equality, an inclusive and non-discriminatory environment, and to tackle swiftly and fairly any discrimination, harassment and bullying that is reported to them.

3.4 Unacceptable behaviour as outlined in this Policy is not necessarily confined to the behaviour of senior staff towards more junior staff, or indeed staff towards students; it can take place between individuals at the same level or involve staff or students behaving inappropriately towards more senior members of the School.

3.5 Members of the LSE community may be personally liable for their actions, which in some instances could lead to criminal or civil action in the Courts under the Protection from Harassment Act 1997, Crime and Disorder Act 1998 and The Equality Act 2010 or any other relevant legislation.

4. Definitions

For the purposes of this Policy the following definitions apply:

Discrimination

4.1 **Discrimination** is defined under The Equality Act 2010 and takes place when an individual or a group of people are treated less favourably than others based on a protected characteristic such as age, disability, gender reassignment, pregnancy and maternity (including treating a woman unfavourably because she is

breastfeeding), race(including colour, nationality, ethnic and national origin), religion or belief, sex or sexual orientation and in relation to direct discrimination only, marriage and civil partnership. Discrimination includes the following categories; direct discrimination (which includes discrimination by association and perception), indirect discrimination and discrimination arising out of a disability.

4.2 **Direct discrimination** occurs where an individual is treated less favourably because of one of the protected characteristic(s). In order for someone to show that they have been directly discriminated against, they must compare what has happened to them to the treatment a person without their protected characteristic is receiving or has received. If there is no comparator, it can still be considered direct discrimination if an individual can show that another individual who did not have their protected characteristic would have been treated better in similar circumstances.

4.3 **Discrimination by association** (other than pregnancy and maternity) refers to a situation where an individual is discriminated against because of the protected characteristic of another individual(s), with whom they are associated.

4.4 **Discrimination by perception** (other than pregnancy and maternity) is discrimination against an individual because he or she is wrongly perceived to have a certain protected characteristic.

4.5 In relation to pregnancy and maternity, it is discriminatory to treat an individual (including a student) unfavourably because of their pregnancy and any related illness or because an individual is seeking to take, taking or taken maternity leave/pay during what is known as 'the protected period.' This protected period begins from the start of pregnancy and ends when maternity leave ends or an individual returns to work after giving birth. If an individual is not an employee or worker, the protected period ends two weeks after a child is born.

4.6 **Indirect discrimination** occurs where an individual is disadvantaged by an unjustified provision, criterion or practice that puts an individual with a particular protected characteristic at a disadvantage compared with others who do not share that characteristic. Any individual claiming indirect discrimination must be able to show that they have been disadvantaged personally or that they will be disadvantaged and it cannot be shown that there is a good reason for applying that specific provision, criterion or practice. For the avoidance of doubt, a provision, criterion or practice can include but is not limited to School policies, ways in which access to any benefit, service or facility is provided and one off decisions.

4.7 Another category of discrimination is **discrimination arising out of a disability** which occurs when a disabled individual is treated unfavourably because of something connected with their disability and there is no justification for this treatment. The Equality Act 2010 protects a person from being treated badly because of something connected to their disability, such as needing time off for medical appointments. It will not apply if the individual alleged to have committed discrimination arising from disability did not know or could not have reasonably be expected to know that the individual making the allegation had a disability.

In the Equality Act 2010, disability means a physical or a mental condition which has a substantial and long-term impact on an individual's ability to do normal day to day activities.

Discrimination arising from disability will occur if the following three conditions are met:

- A disabled individual is treated unfavourably, and are therefore at a disadvantage, even if this was not the intention, and

- this treatment is because of something connected with the disability (which could be the result, effect or outcome of that disability) and
- the treatment cannot be justified by showing that it is 'a proportionate means of achieving a legitimate aim'

It is not unlawful discrimination to treat a disabled person more favourably than a non-disabled person if they require it.

Under the Equality Act 2010, an employer has certain duties to make 'reasonable adjustments'. This is to ensure that a disabled person is not put at a substantial disadvantage by the employment/study arrangements or by any physical feature of the workplace or learning environment. There is a responsibility to make sure that disabled people can access jobs, education and services as easily as non-disabled people. This is known as the 'duty to make reasonable adjustments'. What is reasonable will depend on a number of factors.

When discrimination may be lawful and the Occupational Requirement

4.8 The following types of discrimination may be justified in certain circumstances:

- indirect discrimination
- discrimination because of something connected to an individual's disability
- direct age discrimination.

Where the following three circumstances may apply:

- Positive action– to help a disadvantaged or underrepresented group;
- objective justification– when an employer can prove a legitimate need for less favourable treatment;
- using protected characteristics in recruitment

Under the Equality Act 2010, there can be objective justification for discrimination where both of the following apply:

- there's a 'legitimate aim', such as a genuine business need or a health and safety need and
- the discrimination is 'proportionate, appropriate and necessary' – this means the legitimate aim is more important than any discriminatory effect

If discrimination is found to be justified, then it will not be considered unlawful discrimination.

There may also be other situations where it is lawful for an employer to require a job to be done by someone with a particular characteristic, if having this characteristic is an occupational requirement for the job.

The Equality Act 2010 states all of the following need to be shown for the discrimination to be lawful:

- the requirement is an occupational requirement and there must be a link between the requirement and the job
- the employer has a good business reason or a legitimate aim for applying the requirement and must be able to show it
- having the requirement is the best way to achieve the employer's aim, it must be proportionate

The occupational requirement exception only applies in relation to a decision about:

- recruitment - whether or not to offer a job
- access to training
- promotion or transfer to another job
- dismissals

Harassment

4.9 **Harassment** is set out under the Protection from Harassment Act 1997 and the Equality Act 2010. Section 1 of the Protection from Harassment Act 1997 sets out that: as:

'A person must not pursue a course of conduct: (a) which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. Whilst harassment is not defined references to harassment under section 7(2) of the Act include 'alarming the person or causing the person distress.' It can include repeated attempts to impose unwanted communications and contact upon another individual(s) in a manner that could be expected to cause distress or fear in any reasonable person.

4.10 Under s 26 of the Equality Act 2010 harassment is defined as unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. As such, individuals are protected from three types of harassment. Firstly, it is unlawful to treat someone less favourably where it relates to a 'relevant protected characteristic,' which for the purposes of harassment includes- age; disability; gender re-assignment; race; religion or belief, sex and sexual orientation. For the avoidance of doubt, pregnancy and maternity, marriage and civil partnership are not specifically included within the harassment provisions of the Equality Act 2010, although unwanted conduct related to these would be considered as harassment due to sex. In addition to this, an individual may put forward a case for harassment if they do not have the specific protected characteristic, but instead have a connection with the protected characteristic.

4.11 Another form of harassment is **Sexual Harassment** which occurs when you engage in unwanted conduct or behaviour which is of a sexual nature and which has the purpose of violating an individual's dignity or creating an intimidating, hostile, degrading or offensive environment. Examples of what may constitute Sexual Harassment are set out in Appendix 1 of this Policy. The School's Sexual Harassment and Sexual Violence Policy is intended to cover instances of harassment and/or violence of a sexual nature.

4.12 Harassment may also occur when an individual is treated less favourably because they have rejected or submitted to unwanted conduct of a sexual nature or behaviour that is related to gender identity or sex.

4.13 **Misogyny** is the conscious or unconscious hatred/dislike of, contempt for or ingrained prejudice against women. It can take many forms such as male privilege, patriarchy, gender discrimination, sexual harassment, belittling of women, violence against women and sexual objectification of women. It can also be expressed in many forms including psychological and physical abuse, sexual harassment, and sexual violence.

Victimisation

4.13 Victimisation means treating an individual unfavourably (subjecting them to a detriment) because they have done a protected act. A protected act can be:

- making a claim or complaint under the Equality Act (for example, for discrimination or harassment)/Public Interest Disclosure Act 1998
- helping someone else to make a claim by giving evidence or information
- making an allegation that someone has breached the Equality Act, or
- doing anything else which may relate to the Equality Act

Victimisation also means subjecting an individual to a detriment because it is believed they have done or are going to do a protected act; or giving evidence to support an individual complaining about a protected act; the individual does not actually need to have done the protected act.

Bullying

4.14 Bullying is defined as intimidating, hostile, degrading, humiliating or offensive behaviour which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, or humiliating environment. Bullying usually involves a repeated course of conduct. Bullying does not need to relate to a protected characteristic.

4.15 It may be physical or psychological in nature and conducted in an open environment or a secretive manner. It is behaviour that is often repetitive and intended to dominate another person or group by making them feel degraded, humiliated, intimidated or offended. It can cause a person to lose respect and confidence.

Stalking

4.16 Stalking is an offence under English law and is also considered a form of harassment and/or bullying, regardless of whether the perpetrator is known or a stranger to the victim. It is usually persistent and unwanted conduct. It can be physical or psychological and take place directly against a person, or by approaching a third party about a person. Following a person home, pestering them, sending or leaving them unwanted and repeated messages on their telephone or email, bullying them on social media or making intrusive or unwanted visits are examples of how stalking may take place.

Hate Crimes, Incidents and Speech

4.17 Hate crimes are any crimes that are perceived to be targeted at an individual because of hostility or prejudice towards that individual's: **disability, race or ethnicity, religion or belief, sexual orientation,**

transgender identity.

4.18A hate incident is behaviour which is not a crime but which is perceived by the victim, or anybody else, to be motivated by hostility or prejudice based on the 5 protected characteristics as mentioned in 4.17. When hate incidents become criminal offences they are known as hate crimes and can be prosecuted.

4.19 Hate speech is all forms of speech which spread and justify racial hatred, xenophobia, homophobia/biphobia/transphobia, anti-Semitism or other forms of hatred based on intolerance (Institute for Strategic Dialogue). This includes hate speech directed at others due to their protected characteristics (all protected characteristics as set out in the Equality Act 2010).

4.19 Examples of all of the above definitions are set out in [Appendix 1](#).

5. Harassment and bullying via the internet and/or email and social media sites

5.1 Harassment, bullying and stalking can also take place on the internet and through the misuse of email and social media. This can include but is not limited to the use of social media including Twitter, Facebook, Instagram, LinkedIn, WhatsApp, YouTube, Reddit, TikTok, Snapchat and other platforms, as well as chat rooms and other forums, personal web pages, emails, text messages, Skype, conference calling and other online tools. This may also occur during online teaching/seminar or any other online meeting that may be arranged and connected to a student's learning experience.

5.2 When using social media or posting online all members of the LSE Community should consider the content, language and appropriateness of such communications. Use which is deemed unacceptable includes but is not limited to the following:

- making and/or sharing sexually explicit, racist, violent messages and/or offensive messages or other such content via social media
- forming or participating in an online group that isolates or victimises fellow students, members of staff and or other members of the LSE community
- using social media to access or share illegal content
- using language which would be deemed to be offensive, threatening or humiliating to others in a face-to-face setting
- Making defamatory comments
- Sharing confidential information
- Imitating another LSE community member on social media

5.3 Any such unacceptable use can lead to an investigation under the relevant disciplinary procedure. Members of the LSE community are additionally required to comply with the School's Conditions of Use of IT facilities which can be found at: <https://info.lse.ac.uk/staff/Services/Policies-and-procedures/Assets/Documents/conOfUseOfITFacAtLSE.pdf>

6. Action against discrimination, harassment, victimisation and bullying

6.1 Where it is possible and where there is no risk to safety, the School would always encourage an individual to inform the alleged perpetrator that they find the behaviour directed against them

unacceptable and ask them to stop. In some cases, the situation may be resolved in this way. A written record should be kept of all incidents including the details, dates, times, circumstances and witnesses. If the matter is not resolved or the behaviour persists, then an individual should approach the relevant members of the School to escalate the matter as set out under the relevant School procedure. There is also a list of internal contacts set out in Appendix 2.

6.2 Where an allegation is brought forward to be considered formally, the School will conduct confidential and impartial investigations into allegations made. In deciding whether conduct is discrimination, harassment or bullying, the School will take account of the following factors:

- the alleged reporting individual's perception of the conduct
- other circumstances of the case;
- whether it is reasonable for the conduct to have had the effect of discrimination, harassment or bullying

The School will take into consideration any aggravating factors such as unacceptable behaviour arising from an abuse of power from an individual who is in a senior position against an individual who is in a junior position.

6.3 Where an allegation is upheld, this may normally result in disciplinary action which can include dismissal, expulsion or referral to the police in serious cases. The relevant procedures are outlined below:

6.4 For students and members of staff

For students:

- The Disciplinary Procedure for Students:
<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/disProStu.pdf>

For the avoidance of doubt, where a student reports an incident (as outlined under this Policy) against an LSE member of staff, then this will be referred to the LSE Human Resources Division to investigate under their procedures i.e. the Grievance Policy and Procedure for Professional Services staff/ Disciplinary and Dismissal Policy for Professional services staff/ Academic Annex Procedure for Academic/Research staff.

In relation to student cases, the School and the LSE Students' Union may use their own separate procedures to investigate and take appropriate action to resolve the same allegation of harassment, discrimination and bullying (i.e. the School considering a student's status at LSE, the Union considering a student's membership of its organisation). Aside from banning a student from Students' Union space, the Students' Union can take disciplinary action against LSESU staff or a student group (such as a club or society). For the avoidance of doubt, the Students' Union procedure is separate to the School procedures and information would not normally be shared between the LSESU and the School unless the student has consented or if there are exceptional circumstances that require the sharing of that information (i.e. safeguarding issues).

For members of staff:

- Grievance Policy and Procedure for Professional Services Staff (most cases would initially begin under this procedure):
<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/griPolProAcaSupSta.pdf>
- Disciplinary and Dismissal Policy for Professional Services Staff:
<https://info.lse.ac.uk/staff/divisions/Human-Resources/Assets/Internal/staff/Policy/PSSDisAndDismissal.pdf>
- Academic Annex Procedure for Academic and Research staff:
<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/acaAnn.pdf>

6.5 Allegations by or against other members of the LSE community will be considered under their relevant contract/engagement with the School or any other relevant School Procedure/Policy/ Code which may relate specifically to them.

6.6 Disclosures/Reports regarding discrimination, harassment and bullying may also be made using the School's Report It Stop It tool. Reports raised through this tool may subsequently be investigated under one of the above set out procedures.

6.7 If an individual has experienced or witnessed third party harassment (of a member of the LSE Community) they should initially discuss this with their line manager, supervisor, academic mentor, Senior School Advocate for Students or one of the Internal contacts set out in Appendix 2 in the first instance. The School will then consider what appropriate action will need to be taken which may include but is not limited to notifying third parties and using their complaints procedure if applicable or notifying LSE Security and/or the police if required.

6.8 Where a disclosure or report indicates that there may be a risk of harm to that individual or others within the LSE Community, then a small, select few members of the School which may include a representative from Student Services, the Legal team, Human Resources, Security, Residences and the Disability and Wellbeing Service aside from the Chair ('the Group') will meet 'on a need to know basis' to assess the risks arising from such disclosure/report and consider what immediate and long term action may be necessary and by who to ensure the safety and wellbeing of the individual who has made the disclosure or report as well as the other students, staff and wider LSE Community who may also be at risk or need assistance. Anyone at the School may trigger this Group or may seek confidential advice from any member of the Group who will provide guidance as to whether the Group should be triggered or whether the matter may be referred to a specific area of the School.

6.9 Cluster disclosures

Where there may be a cluster of disclosures (whether made anonymously or not) that originate from a specific Department/Division of the School and which concern any type of unacceptable behaviour outlined in this Policy, then the School may carry out an investigation/survey with staff/students, where relevant, within the specific Department/Division. This is to ascertain information on and understand the unacceptable behaviour that has been disclosed and to identify next steps including putting in place appropriate support and/or taking any necessary preventative measures.

6.10 Malicious and/or vexatious allegations

Disciplinary action may be taken if allegations are found to be malicious or vexatious. However, individuals will not be subject to disciplinary action or to any other detriment simply because their complaint is not upheld, and will only face disciplinary action if it is found both that the allegation is false and made in bad faith (that is, without an honest belief in its truth).

7. Confidentiality and Data Protection

- 7.1 The School will conduct confidential and impartial investigations into allegations made relating to unacceptable behaviour or conduct as outlined in this Policy. It will at all times comply with The Data Protection Act 2018 and the General Data Protection Regulation (GDPR). Any information provided in relation to harassment, discrimination and/or bullying shall be kept confidential and will only be shared with others within the School on a 'need to know' basis.
- 7.2 There may be instances where the School may have to disclose confidential information to the police (where in exceptional circumstances the School considers that there is a high risk of continuing harm to the reporting individual or others within the LSE community or to prevent a further incident which constitutes a criminal offence from occurring), the civil and criminal courts if requested formally or to the Office of the Independent Adjudicator (OIA). The School may also use anonymous data on cases internally for reporting, learning, training and evaluating or externally with regulators in the higher education sector.

8. Monitoring of Cases

- 8.1 The School will compile anonymous information about the number, nature and outcomes of, discrimination, harassment and bullying cases each academic year, with a view to keeping the Ethics Management Board, the Harassment and Safeguarding Forum and the HR Management Board updated. The Policy will also be reviewed at regular intervals to monitor its effectiveness.

*Please note that this policy can be available in other formats if required.

APPENDIX 1- EXAMPLES

This Appendix provides some examples.

DISCRIMINATION

Direct Discrimination

Age:

- An employer refuses an individual to do a training course because they think they are 'too old', but allows younger colleagues to do the training.

Disability:

- during an interview, a job applicant tells the potential employer that he has multiple sclerosis. The employer decides not to appoint the individual even though they are the best candidate they have interviewed, because they assume the individual will need a lot of time off sick

Gender re-assignment:

- a transsexual (as defined under the Equality Act 2010) student is discriminated against and treated differently to someone who is non transsexual

Marriage:

- a woman works night shifts but is dismissed when she gets married because her employer thinks a married woman should be at home in the evening

Race:

- a member of staff or student is treated less favourably than their colleague or peer and denied promotion (in relation to a member of staff) because they are from a different race

Sex:

- male students are given preferential treatment in seminars over female students
- Devaluing women, their voices and their work. This can include explaining things to women in a condescending way as if they have no knowledge on the subject, talking over women or talking down on the work of a woman within a field/subject. This can also include having different views or judgments on behaviour, for example, women in leadership may be called bossy and seen negatively whereas men may be congratulated and are given more positive connotations in comparison;
- Silencing, belittling or stereotyping women; this can include but is not limited to not including women in conversations, and making assumptions about a particular role being suitable for specific genders. An example can include organising a course committee meeting and women being expected to organise the refreshments.

Sexual orientation:

- at a job interview, a woman makes a reference to her girlfriend. The employer decides not to offer her the job, even though she is the best candidate they have interviewed

Examples of direct discrimination based on association or perception:

- an individual is discriminated against because their family member is transgender (association)

- an individual is discriminated against because they are perceived to be of a certain religion (perception)

Indirect Discrimination

Age:

- an employer applies a policy whereby it only offers training development opportunities to employees under the age of 30.

Disability:

- a job advert states that all applicants must have a driving licence. This puts some disabled people at a disadvantage because they may not have a licence because, for example, they have epilepsy. If there is an occupational requirement for this, the requirement will be justified. If it is for a class teacher it would be more difficult to justify.

Gender re-assignment:

- a class teacher runs an ice-breaker asking all students to bring in childhood photos and then chastises a trans student for not doing so (because the student does not want their colleagues to know that their natal sex doesn't align with their gender identity).

Race:

- An employer refuses to employ people who cover their own hair, this would put certain individuals from a particular race(s) at a disadvantage when applying for a position

Religion:

- a dress code is imposed which in appearance applies to everyone, but which may discriminate against certain individuals who follow a particular religion

Sex:

- an imposition of compulsory full time work for all is introduced per new criteria –this may put female staff members at a disadvantage as they are more likely to be the primary care giver for their children and may need to work part time/have flexible hours

Sexual Orientation:

- There is a Policy which is in place which prevents students who are LGBTQ from taking part in an organised field trip.

Discrimination arising out of a disability

- A student with autism who can be disruptive is asked not to no longer attend seminars and lectures

- A department is aware that a new member of staff requires certain reasonable adjustments to be made as a result of their disability. Some of those adjustments are made, but other adjustments are not made which results in the staff member struggling at work and requiring further time off.
- an employee with cancer is prevented from receiving a bonus because of time they have taken time off to receive treatment

HARASSMENT

- jokes, offensive remarks or intimate questions conveyed orally or in writing directly to a person or about a person to a third party;
- producing, sending or displaying inappropriate and/or offensive images or other material to, or about, a person or group;
- insulting, abusive, embarrassing or patronising behaviour or comments, humiliating and/or demeaning criticism;
- abuse, threats or intimidation towards a person or group;
- damaging, defacing or removing a person's or group's property;
- breaching a person's confidentiality by disclosing their sensitive personal information;
- less favourable treatment by excluding a person from a benefit or opportunity that is open to others;
- isolation from normal work or study place conversations or social events;
- unwanted physical conduct such touching, staring at or hitting a person;
- sexually assaulting or making sexual advances towards another person;
- being part and contributing to a workplace or study environment where a culture which tolerates harassment and bullying persists, i.e. in telling racist/religious jokes;
- persistently overloading an individual with work that the individual cannot reasonably be expected to complete;
- Gaslighting -manipulative, abusive behaviour targeting an individual with the purpose of making them question their own memory, perception or judgment using persistent denial, misdirection, contradiction and lying.

Harassment due to age

This could be any action whereby prejudicial assumptions, attitudes and stereotyping is expressed about an individual's abilities based on their age. It can also result in exclusions from social or educational activities as a result of these prejudicial views.

- assumptions regarding the individual's inability to learn
- offensive remarks
- exclusion on the basis of age

Harassment of people with disabilities

This could include any of the following:

- failure to make reasonable adjustments
- imposing unfair work expectations and tasks
- intimidation and name calling
- discussion of the effects of a disability on an individual's personal life
- inappropriate touching or staring relating to an individual's disability
- inappropriate questions about the impact of someone's disability

Harassment due to gender re-assignment

Gender re-assignment covers a person who:

- is proposing to undergo
- is undergoing
- or has undergone

a process, or part of the process, to reassign their sex by changing physiological or other attributes determining sex.

Examples include but are not limited to:

- insulting remarks relating to gender re-assignment
- jokes and mocking behaviour
- asking inappropriate questions in relation to an individual's gender re-assignment
- name calling

Harassment based on Race

Any hostile or offensive act or expression by a person of one race, colour, nationality - including citizenship, or ethnic or national origin against a person of another. Examples can include but are not limited to:

- making jokes, insinuations, humiliating comments or racially oriented remarks
- criticizing and being intolerant in regard to the individual's differences: his or her accent, clothing, hairstyle, customs and beliefs
- acting seemingly disgusted or showing contempt in the individual's presence
- finding excuses for not working with an individual
- exclusion from normal workplace conversations or activities
- unfair allocation of work
- stereotyping the victim with subordinate tasks or case-loads
- trying to hinder or stop the victim's chances for a promotion
- showing comic strips, pictures or images that are racially degrading
- racist graffiti, slogans, images or insignia
- racial stereotyping - assuming that all people of a particular race have the same characteristics
- unacceptable terminology - derogatory terms that refer to somebody's race are clearly unacceptable and discriminatory.

Harassment based on religion

Religious Harassment is any behaviour deliberate or otherwise, pertaining to religion, religious belief or other similar philosophical belief and it is behaviour which can be defined as unwanted conduct violating a person's dignity, or creating an intimidating, hostile, humiliating or offensive environment. Examples can include but are not limited to:

- making offensive jokes regarding an individual's religion
- ridiculing their religious beliefs/practices
- displaying offensive material

Harassment based on sex

Sex-based harassment means unwanted conduct that is related to an individual's sex or the sex of another person.

Sex-based harassment will not, therefore, be sexual in nature but will be behaviour that is linked in some way to gender and causes offence to an individual. Examples can include:

- making derogatory or demeaning jokes about women generally and a particular individual (male or female) finds this unwelcome and offensive
- Sexist comments/jokes/banter and gendered expressions being made such as using generic masculine genders in conversations (His/his etc)
- Disproportionately checking up on female staff more than male staff to ensure that work is being done as an assumption is made that women working remotely will undertake more childcare or housekeeping duties than men
- Setting out sexist stereotypes aimed at women. This can include viewing women's sexual behaviour to men's sexual behaviour differently or thinking women are not good at sports or that women should become mothers and stay at home;
- Devaluing women, their voices and their work. This can include explaining things to women in a condescending way as if they have no knowledge on the subject, talking over women or talking down on the work of a woman within a field/subject. This can also include having different views or judgments on behaviour, for example, women in leadership may be called bossy and seen negatively whereas men may be congratulated and are given more positive connotations in comparison;
- Silencing, belittling or stereotyping women; this can include but is not limited to not including women in conversations, and making assumptions about a particular role being suitable for specific genders. An example can include organising a course committee meeting and women being expected to organise the refreshments

Harassment based on Sexual Orientation

Homophobia is a term used to describe a range of negative attitudes and feelings towards homosexuality or people who are identified or perceived as being lesbian, gay, bisexual or transgender (LGBT). It may be directed against individuals or groups of people and harassment in this case is behaviour which can be defined as unwanted conduct violating a person's dignity, or creating an intimidating, hostile, humiliating or offensive environment. Examples may include but are not limited to:

- Homophobic, biphobic or transphobic remarks or unwelcome jokes
- verbal threats to disclose sexuality
- derogatory comments
- intrusive questioning about a person's domestic circumstances or intimate questions about sexual activity
- innuendo and gossip about the individual
- physical attack
- exclusion from normal work place / class conversation or activities
- incitement of others to commit any such acts

Sexual Harassment

Sexual harassment occurs when you engage in unwanted behaviour which is of a sexual nature and which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the individual. 'Of a sexual nature' can cover verbal, non-verbal or physical conduct including unwelcome sexual advances, inappropriate touching, forms of sexual assault, sexual jokes, displaying pornographic photographs or drawings, or sending emails with material of a sexual nature. Examples can include but are not limited to:

- sharing sexually inappropriate images or videos, such as pornography or salacious gifs, with co-workers
- sending suggestive letters, notes, or e-mails
- displaying inappropriate sexual images or posters in the workplace
- telling lewd jokes, or sharing sexual anecdotes
- making inappropriate sexual gestures
- staring in a sexually suggestive or offensive manner, or wolf-whistling
- making sexual comments about appearance, clothing, or body parts
- Violent sexualised language aimed at women such as having conversations that include graphic and non graphic depictions of violent acts against women which can take place in person or online.
- inappropriate touching, including pinching, patting, rubbing, or purposefully brushing up against another person
- asking sexual questions, such as inquiries about someone's sexual history or their sexual orientation

Sexual harassment and Sexual Violence are covered under the School's Sexual harassment and Sexual Violence Policy.

Harassment relating to the rejection or submission of unwanted contact of a sexual nature or behaviour that is related to gender identity or sex

- An individual is being moved from a committee, department or study group, because they have rejected sexual advances of another member of the same group.

BULLYING

- unmerited criticism, exclusion, isolation and/or gossip;
- spreading rumours about a person;
- stalking or persistently displaying unwanted conduct to a person face-to-face, online for those who are remotely working/studying or by another means of communication;
- micro-managing (vs what constitutes reasonable staff monitoring and assessment) and constantly checking up on staff to indicate to the staff member a lack of trust e.g. constantly checking a staff member's availability status on Teams;
- Ignoring or belittling someone's contribution at meetings (including at online meetings) or providing a disproportionate, aggressive or unreasonable response to their contributions;
- Repeatedly failing to copy someone into emails who should be copied in;
- Members of staff, including senior managers, encouraging or directing bullying behaviour via other members of staff (to assume no direct involvement);
- Gaslighting -manipulative, abusive behaviour targeting an individual with the purpose of making them question their own memory, perception or judgment using persistent denial, misdirection, contradiction and lying;
- taunting, teasing, ostracising or ridiculing a person either directly or to a third party;
- shouting at or berating a person in a public environment, such as in an office, during a committee session or in a classroom as well as if they are working/studying remotely within their home environment;
- ignoring or excluding individuals;
- Actively trying to remove credit given to individuals for work they create or to knowingly transfer credit for that work to others who did not create the work/were not involved;taking or hiding another person's property;
- undermining a person's ability to carry-out or take credit for their work by unfairly overloading them with menial tasks, taking their work away from them, or stealing, duplicating or copying their work;
- physically or verbally threatening or intimidating a person;

VICTIMISATION

- An individual suffers a detriment as they are denied opportunities to progress by their manager because the individual previously made a race discrimination claim against them.
- An individual supports a fellow colleague/student in making a complaint of sex discrimination against their line Manager/ supervisor. As a result, that individual is treated unfairly and has been subjected to isolating and exclusionary behaviour by their line manager/supervisor.

STALKING

- following an individual
- contacting/attempting to contact a person by any means including via social media
- monitoring the use by a person of the internet, email or any other form of electronic communication,
- interfering with the property in the possession of an individual
- loitering in any place (whether in public or private) where the individual may be present

CYBER HARASSMENT AND BULLYING

Examples of such behaviour includes but is not limited to the following:

- to harass and bully an individual via social media
- online surveillance of an individual
- identity theft such as subscribing the individual to services, purchasing goods and services in their name;
- damaging the reputation of the individual on social media
- inappropriate use of texts or postings on social media against an individual
- electronic sabotage such as spamming and sending viruses or
- tricking other internet users into harassing or threatening an individual

HATE INCIDENT/CRIME AND HATE SPEECH

Hate incidents/crime can fall into one of three main types: physical assault, verbal abuse and incitement to hatred.

- **Physical assault**

Physical assault of any kind is an offence. Depending on the level of the violence used, an alleged perpetrator may be charged with common assault, actual bodily harm or grievous bodily harm.

- **Verbal abuse**

Verbal abuse, threats or name-calling.

- **Incitement to hatred**

The offence of incitement to hatred occurs when someone acts in a way that is threatening and intended to stir up hatred. That could be in words, pictures, videos, music, and includes information posted on websites.

Hate content may include:

- messages calling for violence against a specific person or group

- web pages that show pictures, videos or descriptions of violence against anyone due to their perceived differences
- chat forums where people ask other people to commit hate crimes against a specific person or group

Hate Speech

- **Demonisation:** Presenting the target group/individuals (often but not always a minority) in overwhelmingly negative terms – characterising them as inherently malicious, dishonest or threatening.
- **Toxic misinformation:** False stories linking the target group to violent, criminal or morally corrupt behaviour.
- **Dehumanisation:** Portraying the target group as subhuman

APPENDIX 2 –INTERNAL AND EXTERNAL CONTACTS AND SOURCES OF SUPPORT

INTERNAL CONTACTS

You are encouraged to approach one of the following members of School staff if you have any concerns about discrimination, harassment and/or bullying:

- Deputy Head of Student Services (Advice and Policy), Dr Pete Evanson at: p.evanson@lse.ac.uk
- The Anti-Harassment Support Advisor, Laura Boland at: l.d.boland@lse.ac.uk
- The Adviser to Women Students, Sarah Trotter at: s.trotter@lse.ac.uk
- Head of Legal, Kevin Haynes at: k.j.haynes@lse.ac.uk
- Your HR Partner
- Head of Student Services, Martyn Annis at: m.annis@lse.ac.uk
- The Dean for the General Course, Mark Hoffman at: gc.dean@lse.ac.uk
- Deputy Head of Student Services (Wellbeing), Victoria Frost at: v.l.frost@lse.ac.uk
- Head of Residential Life, James Greenwood at: r.j.greenwood@lse.ac.uk
- Security Operations Manager, Richard Mulcahy at: r.mulcahy@lse.ac.uk
- Head of Alumni & Supporter Engagement, Philanthropy and Global Engagement Division (PAGE), Chris Kendrick at: c.kendrick@lse.ac.uk
- The Ethics Manager at: ethics@lse.ac.uk
- Your Academic Adviser, Supervisor or Departmental Tutor
- The Warden of your hall of residence
- The Student Counselling Service at: student.counselling@lse.ac.uk
- The School's Equity, Diversity and Inclusion Office at: edi@lse.ac.uk
- The Faith Centre at: faithcentre@lse.ac.uk
- Student Services Centre at: ssc.advice@lse.ac.uk

You can also contact the Senior Legal Counsel, Refel Ismail at: r.ismail@lse.ac.uk, the Head of Legal, Kevin Haynes at: k.j.haynes@lse.ac.uk or Legal Counsel, Mariachiara Valsecchi at: m.valsecchi1@lse.ac.uk for advice on this Policy.

Counselling services

All those affected by the disclosure/report, including but not limited to the individual making the disclosure/report, the individual accused and the individual to whom the disclosure/report was made, may access support through the School's counselling services and the LSESU Advice Centre.

The School's Student Counselling Service offers a private and confidential space for Students to discuss anything which is impacting their psychological wellbeing and daily life. The service is staffed with trained counselling professionals, who offer one-to-one appointments and workshops which run

throughout the year. Full information on this Service and how to access it is available on the School website: <https://info.lse.ac.uk/current-students/student-wellbeing/student-counselling/about-counselling>.

Students may also speak with a Mental Health Advisors through the School DWS (<https://info.lse.ac.uk/current-students/student-wellbeing/disability-wellbeing/speak-with-an-adviser>).

In addition to counselling and mental health adviser support, there is also support available through the **School Peer Supporters**. Peer Supporters are trained student volunteers who can offer support, give a fresh perspective and listen to whatever is troubling a student, from academic stresses to relationships. Students can explore the following page (<https://info.lse.ac.uk/current-students/student-wellbeing/students-supporting-students/peer-support-scheme>) to learn more about how Peer Support could help them, and how to contact a Peer Supporter.

Students can also access a 24/7 out of hours mental health support line sponsored by the School via SpectrumLife. All calls are answered by clinically trained counsellors or psychotherapists. Students can talk to them about anything, including stress, anxiety, low mood, financial worries, loss and grief, relationship problems, and substance abuse issues.

Safe Contacts

The School has a network of Safe Contacts. [LSE Safe Contacts](#) are members of LSE staff who have received training and can offer a confidential 'signposting' service for staff and students who have previously or are currently experiencing some form of bullying, harassment or sexual violence.

The Safe Contacts are all volunteers, who are supported by the EDI office and who are committed to supporting LSE's inclusive working, studying and social environment. These safe contacts have received sexual violence training. There are two ways you can speak with a Safe Contact:

1. You can contact Equity, Diversity and Inclusion via email (edi@lse.ac.uk) or by phone (020 7106 1229 or +447971552755)
2. You can reach out to a Safe Contact directly via their contact details www.lse.ac.uk/safecontacts

Report It Stop It

Discrimination, harassment and bullying can also be reported via the following link: <https://info.lse.ac.uk/Making-a-choice>. The report will be treated confidentially, and followed up promptly and fairly.

Union/LSESU Contacts:

For staff cases

The School has three Unions: University and College Union (UCU), UNISON and Unite. Members of staff are able to approach any of these Unions who will be able to listen to you, represent your views and liaise

with the School to tackle inappropriate behaviour.

For further information, please contact the Unions using the relevant contact details as below:

Unison: unison@lse.ac.uk

UCU: ucu.secretary@lse.ac.uk

Unite: i.marston@lse.ac.uk

For Student cases

The Students' Union has Sabbatical Officers, Part-time Officers and an Advice Team who will listen to you, represent your views on these issues and liaise with the School to tackle inappropriate behaviour.

- Sabbatical and Part-Time Officers, a list of whom can be found at: <http://www.lsesu.com/democracy/student-reps/>.
- LSESU Advice Team, which can be contacted at su.advice@lse.ac.uk. You can find more information at <http://www.lsesu.com/advice/>.

EXTERNAL CONTACTS

General

- [Ask the Police](#)
- [Citizens Advice Bureau](#) (rights and responsibilities)
- [Crimestoppers](#) (reporting crime)
- [Equality Advisory and Support Service](#)
- [Metropolitan Police](#)
- [NHS 111](#) (non-emergency service)
- [Nightline](#) – open every night from 6pm to 8am during term time
- [Samaritans](#) (08457 909090 / 020 7734 2800), 116 123, email: jo@samaritans.org
- [Stop Hate UK](#) (all forms of hate crime and discrimination)
- [Victim Support](#) (victims of crime)
- [National Stalking Helpline](#) (support for anyone experiencing stalking)

Sexual and female related

- [National Domestic Abuse Helpline](#): 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)
- [The Havens](#) (London-based support for survivors of recent rapes/sexual assaults for all genders)
- [NAPAC](#) (support for survivors of childhood sexual abuse for all genders)
- [Rights of Women](#) (free and confidential legal advice for women)

Men related

- [National Domestic Abuse Helpline](#): 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)
- [The Havens](#) (London-based support for survivors of recent rapes/sexual assaults for all genders)
- [NAPAC](#) (support for survivors of childhood sexual abuse for all genders)

Race related

- [Ashiana](#) (Asian women's refuge)
- [The Monitoring Group](#) (racial harassment and abuse)
- [Southall Black Sisters](#) (BME women's rights and advice)
- [Imkaan](#) (provides full list of organisations supporting BAME women survivors of sexual and domestic violence)

LGBT related

- [Galop](#) (LGBT+ anti-violence charity)
- [Switchboard](#) (LGBT+ helpline)
- [TransUnite](#) (find a trans support group near you)

Disability related

- [Mencap](#) (the voice of learning disability)
- [Mind](#) (mental health)
- [Respond](#) (support for children and adults with learning disabilities who have experienced abuse and/or trauma for all genders)
- [DeafHope](#) (support for Deaf people experiencing domestic abuse)
- [Stay Safe East](#) (supporting Deaf and disabled survivors of hate crime, domestic and sexual abuse in Waltham Forest and Newham areas of London only)

Religious and belief related

- [Karma Nirvana](#) (supporting victims of honour-based abuse and forced marriage)
- [Forced Marriage](#)– 020 7008 0151 (emergencies)
- [Muslim Women's Network](#) (support for Muslim women experiencing or at risk of abuse)

Hate Crime

Please call 999 if you believe you are in immediate danger

Call 101 for non-emergency enquiries.

In addition, you can report hate crime to some of the organisations who support affected communities, including:

- [Stop hate UK](#) (all hate crime)
- [True Vision](#) (all hate crimes)
- [Tell Mama](#) (anti-Muslim hate crime)

- [Community Security Trust](#) (anti-Semitic hate crime)
- [GALOP](#) (anti-LGBTQ+ hate crime)

APPENDIX 3-LEGISLATION

- **The Equality Act 2010** applies to nine protected characteristics. It provides individuals with legal protection against discrimination, harassment and victimisation.
- The School also has a **Public Sector Equality Duty**, and therefore has a general duty to have due regard to eliminating unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Equality Act 2010.
- **The Human Rights Act 1998 (HRA)**: sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic law.
- **The Protection from Harassment Act 1997** prohibits harassment whatever the cause, with Section 2A specifically referring to stalking. The Act gives rise to both civil and criminal remedies.
- **The Sexual Offences Act 2003** covers all physical forms of sexual abuse, including non-consensual sexual activity.
- **The Crime and Disorder Act 1998** introduced anti-social behaviour orders, sex offenders orders, parenting orders and laws specifically relating to racially aggravated offences, hate crime.
- **The Health and Safety at Work Act 1974** is the main piece of legislation covering health, safety and welfare in the workplace
- **The General Data Protection Regulation 2016 (GDPR)** sets out six legal principles for the processing of data and rules around consent. It ensures that personal data must be secured in line with the Regulation and provides right of access to that data.

Review schedule

Review interval	Next review due by	Next review start
2 years	1 July 2026	17 May 2026

Version history

Version	Date	Approved by	Notes
3	21 st July 2020	SMC	This Policy replaces the existing 'Anti-bullying and Anti-Harassment Policy'
2.1	17 May 2016	Council	'Anti-Bullying and Anti-Harassment Policy' replaces existing 'Harassment Policy'

Links

Related Policies/Procedures	Link
Sexual Harassment and Sexual Violence Policy	https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/harVioPol.pdf
Disciplinary procedure for Students	https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/disProStu.pdf
Student Complaints procedure	https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/comPro.pdf
Disciplinary and Dismissal Policy for Professional Services Staff	https://info.lse.ac.uk/staff/divisions/HumanResources/Assets/Internal/staff/Policy/PSSDisAndDismissal.pdf
Grievance Policy and Procedure for Professional Services Staff	https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/griPolProAcaSupSta.pdf
Academic Annex Procedure for Academic and Research Staff	https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/acaAnn.pdf
Code of Practice on Free Speech	https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/Code-of-Practice-on-Free-Speech.pdf
School's Conditions of Use of IT facilities	https://info.lse.ac.uk/staff/Services/Policies-and-procedures/Assets/Documents/conOfUseOfITFacAtLSE.pdf

Whistleblowing Policy	https://info.lse.ac.uk/staff/Services/Policies-and-procedures/Assets/Documents/lsePubIntDisPro.pdf
Health and Safety Policy	http://www.lse.ac.uk/intranet/LSEServices/healthAndSafety/pdf/SafetyPolicy.pdf
The Ethics Code	https://info.lse.ac.uk/staff/divisions/Secretarys-Division/Assets/Documents/Ethics/EthicsCodeA5postcard.pdf

Contacts

Position	Name	Email	Notes
Senior Legal Counsel	Refel Ismail	r.ismail@lse.ac.uk	Author

Communications and Training

Will this document be publicised through Internal Communications?	Yes
Will training needs arise from this policy	Yes
If Yes, please give details Further guidance and training in relation to this Policy to be looked at by Legal and HR	