Guidance on LST's Commitment to preventing and addressing Harassment and Sexual Misconduct

REPORT and SUPPORT

SECTION 1 - Introduction

London School of Theology (LST) is committed to fostering a safe, respectful and inclusive environment for all members of our community. This document serves as a key resource for understanding our policies, procedures and commitments related to sexual misconduct and harassment, in line with the Office for Students' (OfS) Condition of Registration on harassment and sexual misconduct (Condition E6).

What is the purpose of this document?

This document outlines how LST prevents, addresses and manages incidents of sexual misconduct and harassment. It reflects our commitment to ensuring dignity, equality and respect for all, creating an environment free from inappropriate behavior, and prioritising the safety and wellbeing of our community.

Who does this apply to?

This document applies to all members of our community, including students, staff, contractors, visitors, clients and third parties. It covers all forms of sexual misconduct and harassment, whether it happens in person, online or in any LST-related context.

Why is this important?

This document is the official source of all our policies and procedures on sexual misconduct and harassment. In addition to LST's Harassment and Sexual Misconduct policy for students, this document aligns with other LST policies, particularly the Bullying policies for students and staff, Safeguarding policy and the Student Conduct and Discipline Rules, which work together to create a consistent and supportive approach.

By working together, we can create a culture of safety, respect and inclusivity where everyone feels valued and supported.

SECTION 2 - Policies

Our key policies to promote safety, respect and inclusion

LST has a range of policies to ensure a safe, respectful and inclusive community. These policies work together to set out clear expectations for behavior, outline our procedures for addressing concerns, and ensure that everyone feels supported.

Key policies include:

- **Harassment and Sexual Misconduct policies and our Bullying policies** – details how we prevent, address and respond to incidents of harassment and sexual misconduct and bullying.
- **Safeguarding policy** – outlines our commitment to safeguarding the wellbeing of all members of our LST community, and how we meet our statutory duties to protect children, young adults and adults at risk.
- **Equality, Diversity and Inclusion policies** – demonstrates our commitment to creating an environment which ensures equality of opportunity for all.
- **Student Conduct and Discipline Rules** – outlines expected behaviors and the process for addressing student misconduct.
- **Student Complaints and Grievance Procedure –** ensures we appropriately address concerns about staff behavior or LST practice.
- **Code of Practice on Freedom of Speech –** provides guidelines on how freedom of speech should be exercised and protected within LST settings.

All LST policies can all be viewed here: https://lst.ac.uk/our-policies

These policies work together to provide a consistent and supportive approach to creating a safe, inclusive and welcoming environment.

SECTION 3 – Reporting, disclosure and response

Reporting, disclosure and response for students:

If a student has experienced or witnessed harassment or sexual misconduct, support and reporting options are available. Trained Student Support First Responders are here to help, whether the student needs support, wants to report (anonymously or otherwise), or explore their options.

The LST's **Report and Support Pathways** webpage provides information on reporting and accessing support, including:

- Emergency contact details for immediate support;
- Information on LST and external support services;
- Resources for survivors of sexual violence, bullying, harassment, and hate crimes;
- Guidance on reporting incidents to the LST, police or a Third Party, including anonymously;
- Step-by-step reporting processes for both student and staff misconduct;

All reports made in good faith will be taken seriously, and the student will not be disadvantaged regardless of the outcome of an investigation.

Support

Our services ensure that all affected parties receive the care and assistance they need. We are committed to ensuring that our support services meet the diverse needs of our community, including students with protected characteristics such as those with disabilities or those from marginalised groups. Below provides an overview of support available. For more information, please visit Report and Support Pathways.

- **Care and Concern** – as well as providing holistic support, LST's Care and Concern team can assist if a student is unsure about whether to report an incident or experience of harassment or sexual misconduct. For more information, visit the Report and Support webpage
- **Practical, emotional and financial support –** LST provides a range of services to ensure students access practical, emotional and financial support, including: Counselling and Mental Health; Disability and Dyslexia Service; Pastoral Team.
- **Academic support and adjustments** – LST is committed to minimising the impact on a student's academic experience of any involvement in harassment or sexual misconduct. LST offers a range of academic accommodations, such as deferrals (extensions for assessments) or alternative assessment arrangements. For more information and support with your studies, please consider contacting LST's Learning Support team or your tutor or any member of faculty you feel comfortable speaking to.

- **Support during investigatory processes** - those involved in investigations, whether a reporting party (i.e. a complainant), a responding party (i.e. someone who has been accused of misconduct), or a witness (i.e. someone who has seen misconduct), will receive guidance and appropriate support throughout the reporting and investigatory process.
- **Signposting and referral to external services** - if you would find it helpful, LST can refer you to specialist external services, such as a Sexual Assault Referral Centre or a local sexual violence specialist service.

Reporting Student Misconduct and Concerns (for Staff)

If you are a staff member concerned about a student's conduct or wellbeing, please report it to Care and Concern. Complete the online referral form to report incidents such as bullying, harassment, sexual misconduct or any other forms of misconduct.

For immediate safety concerns, please call any of the following:
The Police: 999 if an emergency or 101 if not.
NHS 111 if you need medical help and advice when not in a life-threatening situation
Alison Atkinson – Chaplain: 07503 159 526
Jonathan Mead - Safeguarding Lead: 07539 521 710
Andy Everhart - LST warden: 07932 462 395
Alice Hunt - Out of hours residential tutor: 07577 082 821

Reporting Misconduct Experienced by Staff

If you are a staff member who has experienced or witnessed misconduct, harassment, bullying, or violence, support is available.

For incidents involving student misconduct, contact the ASDAS (Academic Secretary & Director of Academic Services) (LST will address the misconduct under the **Student Disciplinary procedure**). For incidents involving other staff members, follow **HR disciplinary procedures**.

Staff members have access to support services, including counselling, advice and legal assistance, through the **Employee Assistance Programme** and other staff wellbeing services. For more information, visit Wellbeing Support.

All reports of harassment and sexual misconduct involving staff will be taken seriously. LST's procedures ensure that actions will be taken to support staff safety and wellbeing.

Breaking Down Barriers to Reporting

LST recognises that reporting incidents of harassment and sexual misconduct can be difficult for many individuals. To address these challenges, LST is actively working on initiatives to increase reporting and ensure that all members of our community feel safe and supported when making a report.

Key initiatives include:

- **Online and anonymous reporting**: Care and Concern uses confidential online tools to allow anyone in the LST community (students, staff and the general public), to report incidents of harassment or sexual misconduct. These tools are designed to make reporting easier and more accessible while ensuring confidentiality and serious consideration of all reports.
- **Online Campaigns**: We run awareness campaigns to encourage reporting and educate our community about the available support services. These campaigns focus on breaking down the stigma surrounding reporting and making it clear that support is available for all affected individuals.

By removing barriers to reporting and creating a culture of openness, we aim to foster a safer environment for everyone.

SECTION 4 - Data

Data Collection and Monitoring

At LST, we are committed to collecting and monitoring data on incidents of harassment and sexual misconduct to identify trends, improve our response mechanisms, and support continuous improvement in our policies and practices.

How We Collect Data:
We collect data through various reporting channels, including:

- **Formal complaints** submitted through LST's misconduct and grievance procedures
- **Referral forms** from staff members and concerned parties, including the Care and Concern team

This data allows us to gain valuable insights into the nature and frequency of incidents, as well as to monitor the effectiveness of our policies and interventions.

Use of Data

The data we collect plays a critical role in our efforts to reduce harassment and sexual misconduct across the LST. We analyse this data to:

- **Identify trends**: By understanding the incidents which occur, we can tailor our prevention efforts, resources, and campaigns to address specific areas of concern.
- **Assess the effectiveness of support services**: We continuously review the data to ensure that our support services meet the needs of those affected. This includes evaluating response times, satisfaction rates, and the accessibility of services.
- **Improve reporting mechanisms**: Insights gathered from data help us identify barriers to reporting and improve the reporting processes, ensuring that they are clear, effective, and user-friendly.

This data-driven approach helps us make informed decisions about where to allocate resources and how to enhance the safety and wellbeing of our community.

Transparency and Publishing Data

LST is committed to transparency in its efforts to address harassment and sexual misconduct. We will publish relevant data to inform stakeholders of our progress in tackling these issues and ensuring that our community remains safe and supportive.

How We Publish Data:

- **Internal reporting**: We provide updates on the number of incidents reported, including trends and actions taken. This allows us to demonstrate our commitment to addressing misconduct and supporting those affected.
- **External reporting**: With the advent of the OFS's Condition of Registration on harassment and sexual misconduct, we are committed to developing and making public information about the ongoing work being undertaken to improve processes, better respond to incidents, and prevent harm. We will also provide data on the impact this work is having on the reporting of incidents to LST.

By publishing this data, we aim to build trust with our community, demonstrate accountability, and highlight areas where further action is needed.

SECTION 5 – Investigation and decision-making processes

Overview

The institution has a structured approach for investigating and making decisions regarding allegations of misconduct, including harassment, sexual misconduct and other breaches of conduct. These processes ensure fairness, impartiality, and adherence to the principles of natural justice.

As part of our commitment to ensuring that our investigation and disciplinary procedures align with best practices and Office for Students guidance, we will periodically evaluate the robustness of these processes, identifying areas for enhancement and ensuring compliance with regulatory requirements.

- **Investigation Process**
  When an allegation is made, an impartial investigation is conducted. The investigation may involve gathering evidence, interviewing witnesses, and reviewing documents, with the goal of determining whether what occurred can be classed as misconduct. The investigation is carried out in accordance with the institution's specific procedural guidelines and the principles of fairness.

  The **guidance for investigating student misconduct** provides detailed instructions on how investigations into student misconduct should be conducted. It covers the responsibilities of the investigator, confidentiality requirements, and the process of gathering and evaluating evidence.

- **Decision-Making**
  Following the investigation, a decision is made regarding whether misconduct has occurred. The decision is based on the preponderance of evidence, meaning whether it is more likely than not that misconduct took place.

  The **guidance for panel members** provides information on how the decision-making process for determining student misconduct is to be conducted, ensuring fairness and impartiality. It outlines the steps for making decisions, as well as the importance of adhering to natural justice principles—ensuring all parties have a fair opportunity to present their case.

- **Timescales and Outcomes**
  Clear timelines are set for the investigation and decision-making process to ensure efficiency. Outcomes may include a variety of actions, depending on the severity of the misconduct. These could range from informal resolutions to formal sanctions up to and including expulsion for a student and dismissal for an employee or other corrective actions.

  Information on the specific timescales for different types of cases is provided in the

relevant procedures - **Student Conduct and Discipline Rules (for student misconduct), Student Complaints and Grievance Procedure and HR policies (for staff misconduct).**

Appeals Process

If either party disagrees with the outcome of the investigation or decision, there is an option to appeal. The grounds for appeal typically include procedural fairness, new evidence, or concerns about the decision itself. Detailed information about the appeals process, including timelines and how to submit an appeal, is outlined in the relevant procedures - **Student Disciplinary Procedure (for student misconduct), Student Complaints and Grievance Procedure and HR policies (for staff misconduct).**

SECTION 6 – Handling information

Confidentiality
All information related to incidents of harassment or sexual misconduct is handled with strict confidentiality. Information is only shared with individuals directly involved in the investigation or decision-making process, ensuring that privacy is maintained throughout the procedure.

The institution complies with data protection laws, including the **General Data Protection Regulation (GDPR)**, to protect the personal information of all parties involved. All data collected, such as details of the incident, witness statements, and other evidence, will be stored securely and can only be accessed by authorized personnel.

For more detailed guidance on how personal data is processed and protected, refer to the institution's **Data Protection Policy**. This policy outlines the measures in place to ensure compliance with relevant privacy regulations and how personal data is safeguarded.

Use of Information
Information disclosed during investigations is used solely for the purpose of resolving the case at hand. This includes reviewing evidence, conducting interviews with the involved parties, and making informed decisions. Information will not be used for any other purpose without the explicit consent of the individuals involved, unless required by law.

All parties involved in the process—complainants, respondents, witnesses, and investigators—will be informed about how their information will be used. This ensures transparency and clarity regarding the purpose of sharing information, as well as how it may impact the outcome of the investigation.

The institution's **Safeguarding Policy** provides detailed guidance on confidentiality and the principles of information sharing, ensuring that all involved parties understand the procedures and their rights regarding personal data throughout the investigation process.

If the investigation leads to actions that require further disclosure (e.g., disciplinary measures, or legal obligations), the relevant information will be shared with appropriate personnel or external bodies in line with institutional policies and legal requirements.

Further Information
For more information on how information is managed, please consult the following documents:

- **Data Protection Policy**: [Link to the policy]
- **Safeguarding Policy**: [Link to the manual]
  These documents provide detailed information on confidentiality, data protection, and information sharing principles.

SECTION 7 – Staff training and guidance

Staff Training and Guidance

Specialised Training for Staff
At LST, staff receive training to ensure they are equipped to handle disclosures of harassment, misconduct and other sensitive issues in a professional and supportive manner. Training is tailored to various roles across the institution, particularly for those directly involved in handling disclosures and investigations.

Key training initiatives include:

- **Safeguarding e-learning**: This online course provides staff with a foundational understanding of safeguarding principles, helping them recognize, respond to, and report concerns effectively.
- **Scenario-based training**: A practical approach to equipping staff with the skills to identify, respond to, and report potential concerns, ensuring they are prepared for a variety of real-life situations.
- **Sexual Harassment Online Course**: This course educates staff on the nature of sexual harassment, how to prevent it, and how to respond to disclosures.
- **Care and Concern Team Training**: Specialized training for the Care and Concern team, who are the first responders to disclosures, ensuring they have the knowledge and skills to handle sensitive cases appropriately.
- **Specialist Investigator Training**: Tailored training for those involved in investigating complaints, equipping them with the necessary skills to conduct impartial, thorough, and fair investigations.

Continuous Improvement
LST is committed to the ongoing professional development of its staff and to continuously improving its training programmes. The effectiveness of training initiatives is regularly evaluated to ensure that they meet the needs of staff and the institution. Feedback from staff members and participants is collected to refine and improve training content and delivery methods.

In addition to evaluations, the institution ensures that staff training remains up to date with current legal and policy developments, best practices, and emerging issues in the handling of misconduct and harassment. This helps to ensure a responsive and adaptable approach to safeguarding and misconduct prevention.

Through these efforts, LST demonstrates its commitment to providing a safe and supportive environment for all staff and students.

SECTION 8 – Student learning and awareness-raising

- **Mandatory Training for Students**: mandatory training is provided for all students during freshers week each year.
- **Awareness-raising activity:** awareness campaigns and communications during the year aim to ensure students understand policies and behaviours which constitute harassment and sexual misconduct.

SECTION 9 – Governance

Communication, Accessibility, Review, and Updates

Transparency
LST is committed to transparency regarding any changes made to this document. When updates or amendments are made, the revised version will be clearly communicated to all stakeholders, with a summary of changes provided where necessary. Historical versions of the document will be maintained and made accessible for reference, ensuring a clear record of previous policies and procedures.

Prominence
To ensure that the document is readily accessible, it will be prominently featured on LST's website, the Student and Staff Hubs, and made available to relevant staff and students. This includes easy access through dedicated pages for policies and procedures related to student conduct, harassment, and misconduct. Additionally, links to the document will be included in staff training materials, student orientation resources, and other key communication points across the institution.

Raising Awareness
Awareness of the document and its contents will be raised through various channels. These include direct communication via email or newsletters, announcements during key LST events, and inclusion in relevant training programs. Awareness-raising activities will ensure that students, staff, and other stakeholders understand the importance of the document and are aware of their rights and responsibilities.

Document Updates
LST is committed to regularly reviewing and updating this document to ensure that it remains relevant, clear, and compliant with all legal and regulatory requirements. A scheduled review process will take place at least annually, with additional reviews conducted as necessary to incorporate feedback or respond to changes in law, policy, or best practice.
Any changes made will be communicated in a timely manner, and updated versions will be made available to all relevant parties.

Stakeholder Feedback
Feedback from both students and staff is crucial to ensuring that the policies and procedures continue to meet the needs of all stakeholders. The LST encourages regular feedback through surveys, focus groups, and consultations. This input will be considered as part of the review process, helping to ensure that the document remains effective, responsive, and aligned with the evolving needs of the LST community.