



London
School of
Jewish
Studies
Since 1855

Preventing Bullying, Harassment & Sexual Misconduct Policy & Procedures

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This policy is designed to ensure a safe, welcoming and inclusive working and learning environment, for all members of the London School of Jewish Studies (LSJS) community, where all staff, students and visitors are equally valued and respected. Students in this policy will include teacher trainees and postgraduate teaching apprentices. For clarity of understanding, examples are provided of unacceptable behaviours. Reporting procedures for both those experiencing or witnessing incidents of bullying, harassment or sexual misconduct are also included in this policy.

1. Purpose

Bullying, harassment and sexual misconduct (which includes sexual harassment) are unacceptable behaviour and will not be tolerated.

These behaviours are contrary to the Equality Act 2010; the Protection from Harassment Act 1997; and the Workers Protection Act 2024, and to LSJS' ethos and mission.

LSJS is legally obliged to take reasonable steps to prevent sexual harassment of all its employees, students, trainees, apprentices and visitors.

No member of the LSJS community is expected to tolerate such unacceptable behaviour, whether by a member of the LSJS community, or by a third party such as a supplier or visitor to LSJS, or a member of the public. This policy seeks to ensure that students, employees and visitors are protected from bullying, harassment and sexual misconduct. Employees and students have the right to disclose experiences of unacceptable behaviour experienced while studying or working, to be listened to, and to seek support.

Breaches of this policy by employees, students or visitors will be investigated under the relevant disciplinary procedure which may result in dismissal or expulsion and referral to the police. Breaches by third parties will be dealt with appropriately and may be referred to security and/or the police.

2. Scope

This Policy applies to bullying, harassment and sexual misconduct that is committed or is alleged to have been committed by employees, students or visitors. This includes volunteers, sessional lecturers, contractors, and security personnel.

Employees, students or visitors are encouraged to raise concerns of bullying, harassment or sexual misconduct (including sexual harassment) under this Policy.

The alleged bullying, harassment or misconduct may have occurred:

- On LSJS property
- Via LSJS IT systems
- Off LSJS property
- Online by email, internet or social media

This policy is designed to cover all areas of LSJS, including sites for Tours whether in the UK or overseas, subject to applicable local laws.

3. Definitions

3.1 Abuse of power

An abuse of power is where someone uses their position of power or authority in an abusive and unacceptable manner. Abuse of power can take various forms and may include, but is not limited to manipulation, coercion, pressuring employees to engage in workplace or research misconduct, bullying and harassment. Abuse of power may also occur in the context of a close personal or intimate relationship.

3.2 Bullying

According to ACAS guidance, bullying is intimidating, hostile, degrading, humiliating or offensive behaviour, through means which have 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.

3.3 Consent

Consent is agreeing by choice and having the freedom and capacity to make that choice. The person seeking consent should always take steps to ensure that consent is freely given, that it is informed and recognises that it can be withdrawn at any time.

Freedom to consent: a person is free to make a choice if nothing negative would happen to them if they said no. For example, a person may not feel free to make a choice if:

- they are being threatened with violence (by the perpetrator and/or by someone else)
- they are being threatened with humiliation
- they believe that the continuation or assessment of their studies, or progression or advancement of their career, will be at risk if they refused
- they are being blackmailed
- there is a significant power imbalance and the party without power feels pressured to continue in the relationship against their will.

Capacity to consent: Capacity is about whether someone is physically and/or mentally able to make a choice and to understand the consequences of that choice. For example, a person does not have capacity to give consent if:

- they are drunk or under the influence of drugs- this means someone may still be physically able to have sex, but they may not be able to consent.
- they are asleep or unconscious.
- a person may also not have capacity to give consent if they have, for example, a cognitive or learning difficulty, a disability which impairs their speech, or are experiencing a mental health crisis.

3.4 Disclosure

Disclosure, for the purposes of this Policy and procedures, involves an individual choosing to tell anyone who is part of the University, about their experience of bullying, harassment or sexual misconduct.

3.5 Discrimination

The Equality Act 2010 states that it is against the law to treat any person unfairly or less favourably based on a protected characteristic. The 9 protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including ethnic origin, nationality and colour), religion or belief, sex and sexual orientation.

3.6 Grooming

Grooming can be defined as a gradual process that someone in a position of power uses to manipulate someone to do things they may not be comfortable with and to make them less likely to reject or report abusive behaviour. Grooming will initially start as befriending someone and making them feel special and may result in sexual abuse and/or exploitation.

3.7 Harassment under the Equality Act 2010

Harassment is 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 for that person. The unwanted conduct can be physical, verbal or non-verbal.

3.8 Reporting

Reporting is the sharing of information with an employee of LSJS regarding an incident of bullying, harassment or sexual misconduct experienced by that individual for the purposes of initiating the investigation process set out in this Policy and the accompanying procedure.

The Reported Party is the person or people whose behaviour it is alleged amounted to an incident of bullying, harassment or sexual misconduct.

The Reporting Party is the person or people who witnessed or is the subject of the alleged incident of bullying, harassment or sexual misconduct.

3.9 Sexual misconduct

Sexual misconduct is a form of harassment and is unacceptable behaviour of a sexual nature. It can include sexual harassment (as defined below); rape; sexual violence; intimate partner violence; sexual assault; grooming; coercion or bullying with sexual elements; sexual invitations and demands; sexual comments; sexual non-verbal communication; creation of atmospheres of discomfort; and promised resources or advancement in exchange for sexual access.

3.10 Sexual harassment

Sexual harassment occurs when someone is subjected to unwanted conduct of a sexual nature which has the purpose or effect of either violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A person can be sexually harassed by someone of the same or different sex. Sexual harassment can include, for example:

- (a) unwanted physical conduct of a sexual nature, including touching, pinching, pushing and grabbing, invading personal space, groping, tugging or lifting someone's clothing, and more serious forms of sexual assault.
- (b) continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome.
- (c) sending or displaying material that is pornographic or that some people may reasonably find offensive (including emails, text messages, social media content, video clips and images sent by mobile phone or posted on the internet).
- (d) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); sexual jokes; remarks or comments about someone's body or appearance; sexual derogatory comments about women or men; innuendos; wolf whistling; or stalking.

This list of examples is not exhaustive.

A person can be sexually harassed even if they are not the intended target.

3.11 Third-party harassment

This occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, LSJS, but with whom that person has come into contact during their employment or studies. Third-party harassment could include, for example, unwelcome sexual advances from a supplier visiting LSJSs premises, or where a person is visiting a supplier's premises or other location in the course of their employment.

3.12 Stalking

Following a person, watching or spying on them or forcing unwanted contact with the victim through any means, including social media. The effect of such behaviour is to curtail a victim's freedom, leaving them feeling that they constantly have to be careful. In many cases, the conduct might appear innocent (if it were to be taken in isolation), but when carried out repeatedly to amount to a course of conduct, it may then cause significant alarm, harassment or distress to the victim.

3.13. Victimisation

Treating someone less favourably because they have made a claim or complaint of discrimination, or helped someone else to make a complaint (under the Equality Act), or made a disclosure (whistleblowing) under the Public Interest Disclosure Act 1998, or in either case the affected person is believed to have made or helped make, or is believed that they may make or help make, a complaint or disclosure. Where LSJS becomes aware of victimisation taking place, this may lead to disciplinary action including dismissal.

4. Roles and responsibilities

LSJS is committed to preventing incidents of bullying, harassment or sexual misconduct (including sexual harassment) where reasonably possible. LSJS also commits to make available timely support for those who have been affected by such behaviours; and to provide prompt and equitable methods of investigation and resolution to stop bullying, harassment and sexual misconduct, to remedy any harm, and to prevent its recurrence.

All employees, students and visitors have a responsibility to ensure a working and studying environment where everyone is treated with equal respect and dignity. Each employee and each student are expected to contribute to preventing unacceptable behaviours, including harassment, bullying or sexual misconduct (including sexual harassment) through self-awareness; and by modelling positive behaviour for others, and raising any concerns.

Employees, students and visitors are in a position of trust. It is important that exemplary behaviour is demonstrated. It must be remembered that actions can be misinterpreted by others, no matter how well intentioned. Due consideration should always be given as to what is an appropriate environment and what is appropriate conduct in relation to the activities which are being undertaken.

Ensuring students and staff alike are aware of behavioural expectations, what constitutes bullying, harassment and sexual misconduct, the reporting and investigation process and disciplinary procedures, is implemented through the following forms of communication and action:

4.1 Student onboarding process

- Explained to students as part of the in person (on campus) or live Zoom (distance learning) student inductions
- All students are required to read the Prevention of Bullying, Harassment and Sexual Misconduct Policy and Student Code of Conduct as part of their onboarding process and to confirm agreement by signing an electronic form
- As this is a new policy, pre-existing students will also be required to read and confirm agreement with the policy at the start of the 2025/26 (BA) or 2026 (MA) academic years.
- All policies are available on the LSJS [website](#), and all students are directed to them as part of their onboarding process.

4.2 Campus publicity

- Posters raising awareness of bullying, harassment and sexual misconduct behaviour and reporting procedures will be displayed in the classrooms, café and common areas.
- Designated Safeguarding Leads' names, roles and phone extension numbers will be displayed prominently in the classrooms, café and common areas

4.3 Staff onboarding process

- Explained to staff during their onboarding process
- All new staff are required to read the Prevention of Bullying, Harassment and Sexual Misconduct Policy and Staff Code of Conduct as part of their onboarding process and to confirm agreement by signing an electronic form
- As this is a new policy, pre-existing staff will also be required to read and confirm agreement with the policy at the start of the 2025/26 (BA) or 2026 (MA) academic years.
- The policy and procedures will be included in the LSJS Staff Handbook shared with staff as part of their onboarding and sent to existing staff as an updated document.

4.4 Intimate personal relationships

To help reduce the likelihood of bullying, harassment or sexual misconduct, LSJS does not allow intimate personal relationships between staff and students.

An intimate personal relationship is defined by Office for Students in its Condition for Ongoing Registration E6: Harassment and Sexual Misconduct, as “a relationship that involves one or more of the following elements: i. physical intimacy including isolated or repeated sexual activity; or ii. romantic or emotional intimacy.”

To protect students from any actual or potential conflict of interest and/or abuse of power, any LSJS staff member is prohibited from having an intimate personal relationship with one or more students, except where they are in an excluded relationship. Any breach of this prohibition by a staff member would result in LSJS taking appropriate steps in line with its usual disciplinary procedures, including the possibility of dismissal.

Excluded relationships are any ongoing intimate personal relationships that:

- i. existed before the date this policy came into force and that remain in existence; or
- ii. existed before the date that the staff member became a staff member in relation to that student.

Staff members must communicate their excluded relationship to the Interim Chief Executive Officer, Paul Gould, upon being hired by LSJS.

Paul Gould is the named contact for Middlesex University to liaise with on safeguarding / misconduct matters relating to degree students.

LSJS also undertakes a commitment to inform Middlesex University of any serious incidents involving students in validated degree programmes, where they impact the student's studies and well-being and to cooperate as needed in their resolution.

4.5 Sexual harassment

Sexual harassment is unlawful and will not be tolerated. It may lead to disciplinary action up to and including dismissal if committed:

- (a) In a work or educational situation.
- (b) During any situation related to work or study, such as at a social event with colleagues, during or outside working hours.

(c) Against a colleague or other person connected to LSJS off campus, including on social media.

(d) Against anyone outside of a work situation where the incident is relevant to the worker's suitability to carry out the role.

LSJS will consider any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

If any sexual harassment or victimisation occurs, LSJS will take steps to remedy any complaints and to prevent it happening again. (These may include updating relevant policies, providing training and taking disciplinary action against the perpetrator).

LSJS will take active steps to prevent sexual harassment and victimisation of all employees and students, through the dissemination of this policy, and awareness raising.

Employees and students are required to disclose criminal convictions acquired during employment or study at LSJS.

4.6 Third party sexual harassment

Third Party sexual harassment of LSJS employees or students will not be tolerated. The law requires employers to take reasonable steps to prevent sexual harassment by third parties. While an individual cannot bring a claim for third-party harassment alone, it can still result in legal liability when raised in other types of claims.

Where employees experience third-party harassment, they are encouraged to report it. LSJS will monitor any potential risk areas for third-party harassment and take steps to prevent it occurring where possible. Where third-party harassment does occur LSJS will take steps to remedy any complaints and prevent it from happening again (e.g. by warning the third-party about their behaviour, banning a third-party from LSJS, reporting any criminal acts to the police or sharing information with other branches of the organisation).

5. Informal resolutions

A person affected by bullying, harassment or sexual misconduct under this policy may wish to resolve the behaviour informally if it is a one-off occurrence or is not considered serious. Employees are encouraged to speak to their manager or supervisor. Students are encouraged to speak to their personal tutor. LSJS recognises it is for the person affected to determine the preferred pathway for resolution, and that engaging in informal resolution is not a barrier to bringing a formal complaint at a later time.

LSJS reserves the right to investigate the behaviour, where appropriate.

If a student, or employee is approached and told that their behaviour could be construed as bullying, harassment or sexual misconduct, they should be prepared to listen patiently and calmly. Whilst it may be upsetting, they should allow the student or colleague to express their concerns, and if appropriate, try to reach common ground to remedy the situation and allow a positive working/learning relationship to be resumed. If the nature of the complaint is serious or inappropriate, the student or employees should speak with their line manager or personal tutor to agree the next steps.

6. Complaints procedure

6.1 Reporting process

Students who feel they have experienced or witnessed bullying, harassment or sexual misconduct by another student, employee or visitor are encouraged to approach their Programme Leader or Module Leader in the first instance to report the incident. Should the incident involve their Programme or Module Leader, they are instead encouraged to approach the Interim Chief Executive Officer, Paul Gould.

The LSJS staff member will then complete a bullying, harassment and sexual misconduct reporting form for the record and share this with the Interim Chief Executive Officer. This can be found in the appendix of this policy and separately in the LSJS policies section of the website.

The student as Reporting Party will at the same time be given the opportunity to also submit a disclosure form to the Interim Chief Executive Officer. Their decision to submit or not will be noted on the reporting form completed by the LSJS staff member. Reporting forms links can be found at the end of this document and in the Policies section of the LSJS [website](#).

Employees who feel they have experienced bullying, harassment or sexual misconduct may make a formal complaint against an employee by using the staff grievance policy and procedure found in the LSJS staff handbook.

Where an employee has witnessed, is concerned about or received a disclosure from a student about bullying, harassment or sexual misconduct should make a formal report to the **Interim** Chief Executive Officer at LSJS by using the dedicated reporting form.

Students or employees who feel they have experienced or witnessed bullying, harassment or sexual misconduct by a third party, or a member of the public should discuss this with their line manager, supervisor or personal tutor in the first instance.

This may involve notifying third parties and using their complaints procedure or notifying LSJS Security and/or the police when involving members of the public.

Third parties or members of the public who feel they have experienced or witnessed bullying, harassment or sexual misconduct by an employee or student while at LSJS or participating in an LSJS activity, may make a formal complaint to the LSJS Interim Chief Executive Officer.

6.1 Outcome of a formal complaint/disciplinary case

The Reporting Party will be told whether their complaint has been upheld or not; and whether the Reported Party has been dismissed or expelled.

If the complaint is not upheld or the Reported Party is not dismissed or expelled, information will be shared with the Reporting Party to minimise any adverse effects in accessing their work or study environment, where possible, but there may be limits to the information about the consequences to the Reported Party that can be shared with the Reporting Party.

Where the Reporting Party is told the outcome they will be asked to respect confidentiality with regards to the outcome.

6.2 Support available

LSJS is committed to providing support for members of its community affected by these issues. Support resources such as signposting counselling are available to any member of LSJS who discloses an incident regardless of whether they choose to make a report to LSJS or Police. Employees at LSJS who receive a report or disclosure should direct the reporting party to the support available. LSJS will also offer interim measures as appropriate to the reporting and reported parties, and witnesses involved in formal complaints.

6.3 Interim measures

Following a report, or a disclosure that requires an investigation LSJS may determine it necessary to introduce interim measures. The Interim Chief Executive Officer, together with a non-involved (objective) member of the senior leadership team – the panel, may assess support needs, consider how to protect the interests of all parties and members of the university community who may be impacted by the case, and agree to next steps.

This will be achieved through a robust risk assessment to consider the academic, welfare and support needs of the parties, and any interim measures such as consultation with the Local Authority Designated Officer necessary to ensure a fair and transparent investigation, where appropriate. The panel will also consider its actions in relation to the LSJS Free Speech and Academic Freedom policy where appropriate.

Any interim measures will be proportionate to the nature of the risk(s) being managed. Interim measures may include alternative working arrangements, provision of support, or a recommendation to partially or fully suspend an employee or student during this time and will be recommended by the panel in accordance with LSJS's policies and procedures.

The membership of the panel will be shared with the reporting party in advance of the meeting to ensure transparency and to manage any conflicts of interest.

The risk assessment and any interim measures that are put in place will be shared to both parties; and will be reviewed regularly by the Interim Measures Panel and amended as appropriate.

All information disclosed as part of this process will be treated confidentially and sensitively and in accordance with data protection legislation.

6.4 Police Investigations and Judicial Proceedings

Where criminal investigations and/or judicial proceedings are ongoing or are likely to commence in respect of a disclosure or report, LSJS will usually continue its own investigation and any disciplinary action, subject to the circumstances of the case and police advice.

Where, following police advice or otherwise, LSJS decides not to undertake its own investigation until the case has concluded, LSJS reserve the right to review this decision and to initiate its own investigation and/or disciplinary action at a later stage in or on completion of the criminal investigation and/or judicial proceedings.

A decision by the Police or Crown Prosecution Service (or other law enforcement agency) to take no further action in relation to a criminal matter, or an acquittal at a trial, does not preclude or negate the outcome of LSJS's investigation and/or disciplinary action. Where the trial has completely exonerated the subject of the complaint and it has been found that the Reporting Party has made a false, bad faith or misleading complaint, LSJS may revisit any disciplinary sanction issued to the Reported Party and may consider disciplinary action against the Reporting Party.

An internal investigation is focused exclusively on whether a breach of the prevention of bullying, harassment and sexual misconduct policy and/or other applicable obligations or policies has occurred. The internal process may therefore be considering different issues from a Police investigation or criminal prosecution. This is why it may, depending on the circumstances, be possible to proceed with an internal investigation at the same time as a criminal process.

Where a student or employee is convicted of a criminal offence or accepts a Police caution in relation to behaviour that falls within the scope of LSJS's Prevention of Bullying, Harassment and Sexual Misconduct Policy, they must declare this to LSJS (refer to the disciplinary policy).

6.5 Victimisation

LSJS will not tolerate any form of victimisation against someone who has raised a complaint, or supported a complaint, or for cooperating in an investigation, or challenging unacceptable behaviour, or in each case is believed to have or is believed to be likely to take such steps.

If a formal complaint of victimisation is made about a student's or employee's behaviour it will be fully investigated and dealt with in accordance with the LSJS Student/staff disciplinary policy. Aggravating factors, such as abuse of power, will be considered when deciding what disciplinary action to take.

6.6 False, bad faith or misleading complaints

Submitting a complaint that is not in good faith or providing false or misleading information in any investigation of complaints is also prohibited. If a complaint is found to be false, misleading or in bad faith, it will be dealt with in accordance with the student/staff disciplinary policy.

Confidentiality is very important in dealing with cases of alleged unacceptable behaviour. The Reporting Party, the Reported Party and senior employees handling the report should only divulge information to relevant people on a 'need-to-know' basis.

7. Review of policy

This policy will be reviewed annually, and its effectiveness will be monitored and any changes which are identified as needed will be implemented.

8. Examples of unacceptable behaviours

Examples of unacceptable behaviour that are covered by this policy relating to bullying, harassment and sexual misconduct include (but are not limited to) the following:

- Shouting at, being sarcastic towards, ridiculing or demeaning others.
- Repeatedly or deliberately ignoring people who are waiting to contribute to a meeting; continuously cutting people off whilst they are speaking; persistent aggressive questioning; wilfully being dismissive of someone and their suggestions.
- Deliberately excluding someone from meetings, communications or a social activity without a good reason.
- Abuse of power by blaming a team member if something has gone wrong, rather than taking personal responsibility.
- Deliberately creating an environment where a team member is side-lined or has their responsibilities limited or narrowed.
- Physical or psychological threats.
- Overbearing and intimidating levels of supervision.
- "Grooming" behaviour, for example making someone feel special by buying them gifts, then gradually manipulating them to carry out duties outside of their normal remit, or which are in breach of LSJS policy.
- Allocating employees unreasonable workloads with unreasonable deadlines that require an individual to work excessive hours for sustained periods.
- Unwanted physical contact, including touching, pinching, pushing, grabbing, invading their personal space and more serious forms of physical or sexual assault.

Making offensive jokes or derogatory or stereotypical remarks, or mocking, mimicking or belittling a person or their performance.

- Outing or threatening to out someone as gay, lesbian, bisexual or trans.
- Speculating or gossiping about someone's perceived sexuality or gender identity, refusing to use someone's preferred gendered pronoun (e.g. using 'he' to refer to a trans woman) or continuing to use their former name ('dead naming').
- Being discriminatory or unequal in recruitment or development opportunities or appointing employees in a non-transparent way.
- Any unwanted sexual advances, sexual comments or comments about someone's body or appearance; innuendos; wolf whistling; groping; tugging or lifting someone's clothing, or stalking.
- Racist behaviour, which can include (but is not limited to) making racist jokes, name calling, making assumptions about someone based on their race or religion, racial harassment (for example, anti-Semitism or Islamophobia) or racialised micro-aggressions.
- Not giving due consideration and/or an explanation of a refusal to a reasonable request covered by LSJS policy, such as flexible working, or requests for annual leave.
- Sound or visual recording of employees or students without informing them to gather evidence that may be used against them.

Signed on behalf of LSJS Senior Leadership Team by Paul Gould, Interim Chief Executive Officer

Date created: July 2025

Date revised: July 2026

Date to be reviewed: July 2027

9. Appendix: LSJS Bullying, Harassment and Sexual Misconduct Reporting Forms

Staff Reporting Form

Section A: Employee Details

Your Name	
Your Position	
Phone Number	
Email Address	
What is the reason for completing the form? Select one option below.	
Concerns about a student	☐ [Next complete Section B]
Disclosure from a student	☐ [Next complete Section B]
Concerns about someone responsible for students	☐ [Next complete Section C]

Section B: Student & Details of Concern/Incident

Student's name	
Student's Contact Number	
Email address	
Date of incident	
Time of incident	

Describe in detail the nature of the concern or disclosure. Please make sure to describe clearly any risks presented, and describe what has happened, when and where. Please continue on a separate sheet if necessary.

Record any additional relevant information e.g. a change in the students' behaviour or any observations made prior to the disclosure:

Describe any actions taken:

Section C: Employee Details

Person of Concern's name	
Person of Concern's Position	
Your Concerns - Include as much relevant detail as possible including reasons for concern, name(s) of person(s) involved, dates and times, any discussion that has taken place:	

Student Disclosure Form

Student's name	
Student's Contact Number	
Email address	
Date and time of disclosure	
Record who you verbally reported to and what you said in your own words. Please continue on a separate sheet if necessary.	

Record any additional relevant information

PLEASE PASS THE FORM ONTO PAUL GOULD

(Interim Chief Executive Officer) paul.gould@lsjs.ac.uk

Interim Measures Panel Closure Form – Internal

Panel member names:	
Consultation undertaken:	
Decision made:	No further action Continued monitoring Formal referral (Please circle as appropriate)
Rationale for decision:	
Formal Referral Details - Include details of which agency has been informed, including name and contact number where possible:	

Formal Referral Date	
Senior Management Liaison Include details of which member of Senior Management has been made aware of the situation, any discussions that took place and the date the exchanges took place	
Interim Chief Executive Officer's signature on behalf of Panel	
Date of reporting form closure	