## Harassment and Sexual Misconduct

LCK Academy strives to create an environment where every individual feels safe, valued, and respected. Harassment, bullying, and sexual misconduct are not tolerated in any form. We recognise the importance of proactive safeguarding, and we have systems in place that make it easier for members of our community to report concerns and receive timely, confidential support. This webpage provides a detailed overview of our responsibilities and actions to align with higher education best practice on Harassment and Sexual Misconduct.

LCK Academy is currently preparing an application for registration with the Office for Students (OfS). In anticipation of that application, the Academy is aligning its policies, procedures, and quality assurance framework with the OfS Conditions of Registration and related sector guidance.

## Understanding Harassment and Sexual Misconduct

**Sexual misconduct** is defined in LCK Academy's Anti-Bullying and Anti-Harassment Policy which can be found on our Policies page as a serious breach of dignity, safety, and respect. It refers to all forms of unwanted conduct of a sexual nature, whether criminal or non-criminal, that creates an intimidating, hostile, degrading, humiliating, or offensive environment for any member of the LCKA community.

**Harassment** refers to any unwanted or inappropriate behaviour linked to a protected characteristic, such as gender, race, or disability that aims to, or has the effect of, diminishing an individual's dignity or creating an environment that is intimidating, humiliating, degrading, or offensive. In line with the Equality Act 2010, this also includes instances where an individual is harassed due to their association with someone who has a protected characteristic or because of assumptions made about them.

Sexual misconduct refers to a wide range of inappropriate, exploitative, or unlawful sexual behaviours that violate a person's dignity, autonomy, or sense of safety. This includes, but is not limited to:

- **Sexual harassment**, such as unwanted comments, gestures, or attention of a sexual nature
- **Sexual assault**, including any non-consensual physical contact of a sexual kind
- **Coercive behaviour**, such as threatening, intimidating, or pressuring someone for sexual access or favours
- **Distribution of explicit material** without consent, including sharing private images or videos
- **Abuse of power or influence** in situations where someone may feel pressured to comply due to authority or dependency

Sexual misconduct can take place in any part of academic or professional life. It may involve:

- Student-to-student interactions
- Relationships or conduct between staff members
- Incidents between staff and students
- Individuals from outside the institution, such as contractors, partners, or visitors
- All such behaviours are taken seriously and will be addressed under our safeguarding and disciplinary procedures, in line with UK legislation.

## Where This Policy Applies

LCKA's safeguarding obligations extend across every setting where learning, collaboration, or representation occurs. Whether during work placements, research fieldwork, student-organised events, digital engagement or internships and volunteering, our duty of care remains consistent. We treat all disclosures with the same seriousness and investigate under our safeguarding framework.

## Reporting Mechanism at LCK Academy

LCK Academy provides a dedicated online reporting webpage Report a Safeguarding Concern , which students, staff, and stakeholders can use to disclose incidents of bullying, discrimination, harassment, hate crime, or sexual misconduct. You may choose to report anonymously, request a conversation with a trained member of our Safeguarding Team or by contacting our Designated Safeguarding Lead, SafeguardingandPrevent@lckacademy.org.uk.

All reports are taken seriously, and support will be provided through trained first responders and external services where appropriate.

Trained advisors will explain your options in confidence, help you access appropriate support, and assist you in making an informed decision about next steps.

## Other Ways to Raise a Concern

If you do not wish to use the form, you can also raise a concern by:

- Speaking directly with the Designated Safeguarding Lead: SafeguardingandPrevent@lckacademy.org.uk.
- Contacting the Head of HR: humanresources@lckacademy.org.uk
- Emailing your concern to: complaints@lckacademy.org.uk
- Reaching out to any trusted member of staff

If you request to speak to a Designated Safeguarding Lead (DSL), they will provide confidential, trauma-informed guidance tailored to your needs. At LCK Academy all members of the Safeguarding Team have received specialist training to handle disclosures sensitively and effectively, in line with LCKA's Anti-Bullying and Anti-Harassment Policy (found in our Policies page) and Condition E6 guidance.

LCK Academy also provides support to individuals who are the subject of an allegation. A named staff member will be assigned to offer guidance and ensure access to appropriate information and wellbeing resources, with a clear commitment to fairness and without any assumption of wrongdoing.

Further emotional and wellbeing support may also be accessed through LCKA's qualified Well-being Officer by referral to external partners such as Victim Support, Rape Crisis, or NHS mental health services, depending on individual needs.

## Relevant Policies and Procedures at LCK Academy

The following policies guide how LCK Academy investigates and responds to allegations of student harassment and sexual misconduct:

- The Anti-Bullying and Anti-Harassment Policy (found in our Policies page) defines what constitutes harassment and sexual misconduct and outlines LCKA's commitment to prevention, early intervention, and appropriate response.
- The Staff Handbook and Student Handbook outlines the formal procedures for staff and students respectively, to raise concerns, including the process for escalation, investigation, and resolution of serious allegations.

## Investigation and Decision-Making Process

Depending on the nature of the allegation and the parties involved, the following procedures apply:

- Allegations of harassment or sexual misconduct made against staff will be investigated in line with the procedures outlined in the Anti-Bullying and Anti-Harassment Policy, including potential escalation to a Disciplinary Panel.
- Allegations made against students will follow the Student Disciplinary Procedure.

All procedures are designed to ensure fairness, transparency, confidentiality, and alignment with OfS Condition E6 guidance and relevant UK legislation.

Upon receipt of a report, LCK Academy will acknowledge it within two working days and provide information on next steps, available support, and timelines.

Where an investigation is required, an appropriately trained and impartial investigator will be appointed. For cases involving senior staff, the Executive Dean will normally lead the investigation. For cases involving junior or professional services staff, the Head of HR will act as investigator. For student cases, the Designated Safeguarding Lead (DSL) will lead the investigation. In complex or sensitive matters, LCK Academy may appoint an external investigator to ensure independence and impartiality.

All parties will be notified in writing of the scope, process, and expected timeline of the investigation, which will normally be completed within 15 working days, subject to case complexity.

Both the complainant and the respondent will have equal opportunities to present evidence and respond to findings before any outcome is determined. Decisions are made based on the balance of probabilities, and both parties are informed in writing of the outcome, any resulting actions, and their right to appeal.

LCK Academy is committed to ensuring a safe, respectful, and supportive environment for all members of its community and to maintaining strict confidentiality, impartiality, and fairness throughout every stage of the process.

## Confidentiality and Information Sharing

Confidentiality is a core principle in building a safe and supportive culture at LCK Academy, where individuals feel able to disclose incidents of harassment or sexual misconduct without fear of exposure or reprisal.

LCKA will take all reasonable steps to protect the privacy and confidentiality of anyone who discloses such incidents. Disclosures will be handled with discretion and sensitivity, in accordance with the Anti-Bullying and Anti-Harassment Policy, UK GDPR, and the Data Protection Act 2018 (found in our Policies page).

However, there may be situations where limited information must be shared, either internally or with external agencies, in order to:

- Safeguard a student or staff member at risk
- Prevent a serious crime or threat to others
- Fulfil LCKA's legal and safeguarding obligations

In such cases, only the minimum necessary information will be shared, and only with those who are legally entitled and require it for the purpose of protection or legal compliance.

For more information on how LCK Academy manages confidentiality and the sharing of information, please refer to our Anti-Bullying and Harassment Policy (found in our Policies page) or speak directly with the Designated Safeguarding Lead.

## Prevention and Training

All students are required to complete mandatory induction on sexual misconduct, Safeguarding and Prevent and respectful behaviour upon joining LCK Academy, which is refreshed annually. Staff also undergo mandatory annual training to detect, prevent, and appropriately respond to incidents.

## Training for Students at LCK Academy

At LCK Academy, we are committed to ensuring that all students understand:

- What constitutes harassment and sexual misconduct
- How to recognise, report, and respond to incidents
- What consents means
- How to act as an active bystander

As part of our induction process, all new students receive information and guidance during orientation on these topics. Orientation sessions include practical examples, case studies, and links to support services, ensuring students are aware of their rights, responsibilities, and the tools available to seek help.

Students are introduced to:

- Definitions of harassment, sexual misconduct, and consent
- The Safeguarding Team as the primary reporting route
- What to do if they witness or experience inappropriate behaviour
- The importance of challenging rape culture and supporting a respectful, inclusive environment

We aim for every student to leave the orientation feeling empowered to speak up, advocate for others, and understand how to access support and protection within the Academy.

In future, LCKA intends to implement further interactive training tools and feedback mechanisms to continually improve student understanding and engagement around these important issues.

## Training for Staff at LCK Academy

LCK Academy is committed to equipping all staff with the knowledge and tools needed to foster a safe and respectful environment for students and colleagues.

We have already delivered mandatory online training to all staff, covering:

- Definitions of harassment, sexual misconduct, and bullying
- How to respond to disclosures sensitively and appropriately
- The importance of signposting students to the right support services
- Staff responsibilities and relevant legislation

This training ensures that all staff understand their role in creating a culture where students feel safe to speak up and are confident that they will be taken seriously.

## Ongoing and Specialist Training

- Annual refresher training is scheduled for all staff to maintain awareness and reinforce best practice.
- Staff in specialist roles such as those involved in student support, safeguarding, complaints, or investigations receive in-depth training on responding to sexual violence, trauma-informed communication, and conducting fair and thorough investigations.

LCKA is committed to continually reviewing and improving staff training in line with sector best practice, regulatory expectations, and student feedback. Completion rates for mandatory training are monitored annually by HR and the Designated Safeguarding Lead.

**Appeals are reviewed by the Executive Dean or another senior member not previously involved in the case.**

## Personal Relationships Between Students and Staff

LCK Academy prioritises the protection of students by addressing any potential or perceived risks that may arise from close personal relationships between staff and students, particularly where there is a power imbalance or professional responsibility involved.

To safeguard the integrity of academic and professional boundaries, LCK Academy prohibits staff from engaging in personal or intimate relationships with students where a power imbalance exists, including but not limited to:

- Teaching or tutoring the student.
- Assessing their academic work.

- Having influence over their academic progression, discipline, complaints, or appeals.
- Providing academic, pastoral, or wellbeing support.

In cases where a pre-existing relationship exists (e.g. prior to enrolment or employment), it must be formally declared to the Head of HR as soon as possible. This ensures that any conflict of interest can be identified and appropriately managed in line with LCKA's safeguarding duties

LCK Academy takes these matters seriously in order to uphold fairness, safety, transparency, and alignment with OfS Condition E6 guidance.

Please refer to LCK Academy Staff and Student Personal Relationship Policy for further details.

## Steps we are taking to Protect Students

At LCK Academy, safeguarding is not limited to responding to incidents, it is woven into the way we operate, plan, and grow. Our focus is on building a culture where prevention comes first and students feel genuinely protected and heard. We do this by reviewing anonymised reporting data to spot concerns early, listening carefully to student and staff feedback, and using these insights to shape everything from our training programmes to the way we communicate support. Policies are not reviewed in isolation, students are actively involved in shaping and approving them through formal representation on key decision-making bodies, including the Academic and Quality Board. This collaborative and evidence-led approach is central to our commitment to ensure alignment under Condition E6 guidance and reflects a deeper commitment: to foster a transparent, inclusive environment where wellbeing and accountability are at the core of academic life.

## Freedom of Speech

LCK Academy is committed to upholding lawful freedom of speech and academic freedom, as outlined in the Education (No. 2) Act 1986 and OfS Condition E6 guidance. Nothing on this webpage shall be construed to prohibit lawful expression of opinions or academic debate, provided it does not meet the threshold for harassment or incitement to violence. Please see the LCKA's Academic Freedom and Freedom of Speech Policies for further information (found in our Policies page).

## Non-Disclosure Agreements (NDAs)

LCK Academy does not use Non-Disclosure Agreements (NDAs) in connection with any student disclosures or allegations of harassment or sexual misconduct.

In line with OfS guidance, we are committed to transparency and the right to speak openly about one's experience. Students and staff can be assured that they will never be asked to sign an NDA in relation to harassment or sexual misconduct disclosures at LCK Academy.

## Raising Concerns About our Institutional Response

LCK Academy recognises its legal responsibility under the Equality Act 2010 to take all reasonable steps to prevent harassment. If any student or staff member feels that their report of harassment or sexual misconduct has not been adequately addressed, they are encouraged to raise this, this will be handled through the LCKA Whistleblowing Policy.

This route is in place to ensure that concerns about policy breaches, failure to act, or mishandling of disclosures can be reported safely and independently. Whistleblowing concerns will be reviewed by the Senior Leadership Team and, where appropriate, escalated for further action.

For more information, please see the LCKA Whistleblowing Policy (found in our Policies page) or contact the Head of HR in confidence.

## External Support Services

- While LCK Academy offers comprehensive internal support through our Safeguarding and Wellbeing Teams, we recognise that some individuals may feel more comfortable seeking help outside the institution. A number of national services provide specialist support for those affected by harassment, sexual misconduct, abuse, or mental health concerns. These organisations offer confidential advice, practical guidance, and emotional care tailored to a wide range of needs.

- For anyone affected by sexual violence, resources such as **Rape Crisis** and **The Survivors Trust** provide direct services for women, girls, and other survivors, while the **Male Survivors Partnership** focuses specifically on men. NHS services are also available for both medical care and emotional support following sexual assault. The **Rape Crisis 24/7 helpline** (0808 500 2222) offers immediate, confidential assistance.
- Those facing domestic abuse can contact **Women's Aid** or the **National Domestic Abuse Helpline** (0808 2000 247), which operates round the clock and supports people of all genders and backgrounds.
- For mental health and crisis support, **Samaritans** remains a trusted national charity, accessible 24/7 at 116 123 for anyone in emotional distress.
- LCKA also encourages individuals affected by hate crime to reach out to specialist organisations such as **Stop Hate UK**, **Galop** (for LGBTQ+ individuals), and **United Response** (for disability-related hate crime). Those experiencing stalking can contact **Action Against Stalking** for dedicated help and advocacy.

- A full directory of these services is available through our safeguarding resources and can be accessed anytime by students and staff.

Last reviewed: 28th July 2025