

Dignity at Work and Study Policy

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Always view the current version of the document via the Knowledge Exchange Policy Hub.

Modifications from previous version of document

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1. Introduction and Context

- 1.1. The Liverpool School of Tropical Medicine (LSTM) is committed to creating a great place to work and study, in which the principles of respect, dignity, and inclusion are part of our everyday goals and behaviours.
- 1.2. This policy describes LSTM's commitment to creating and maintaining a culture which supports our community to thrive and flourish. It underpins our belief that everyone has the right to work and study in a safe, dignified, and inclusive environment.
- 1.3. This Dignity at Work and Study Policy does not operate in isolation and links with other LSTM policies, procedures and codes of practice that share its aim, detailed in [Appendix C](#) (staff) and [Appendix D](#) (students) of this document, including the procedure to be followed when raising a concern.

2. Equity and Diversity

- 2.1 LSTM is committed to promoting equity of opportunity, combatting unlawful discrimination, and promoting good community relations. We will not tolerate any form of unlawful discrimination or behaviour that undermines this commitment and is contrary to our equity policy.

This policy required an Equity Impact Assessment, and the assessment is at the end of this policy document.

3. Safeguarding

- 3.1 LSTM believes that everyone from all backgrounds has the right to be protected from all forms of harm. LSTM has a zero-tolerance policy for staff and organisational representatives committing any type of exploitation, abuse, or harassment.
- 3.2 Safeguarding principles are integral to our approach to Dignity at Work and Study. This policy document reflects our organisational commitment to keeping children and vulnerable adults safe, including our staff and students, and outlines how we expect staff and students to behave towards one another.
- 3.3 This document contributes to two important elements of the Four Rs (Recognise, Respond, Report, Refer) of our safeguarding framework:
 - Staff are able to **Recognise** types of unacceptable behaviour, and
 - Know how they can **Report** any concerns, (outlined in Section 6 of this policy).

4. Scope

- 4.1 This is an LSTM Group policy. For the purposes of this policy, the LSTM Group shall include IVCC, WTC and all subsidiaries. Where LSTM is used in this document, it should be read as referring to all LSTM Group companies save for any variations highlighted. Where an LSTM specific role or committee is referred to, it should be read as referring to the equivalent role/committee within the LSTM Group company.
- 4.2 This policy applies to all employees of LSTM Group, regardless of employer. The principles of this policy extend to anyone who comes into contact with LSTM, for example, students, contractors and consultants, honorary appointments, volunteers, partners, and other visitors.
- 4.3 The LSTM Group is a global employer and endeavours to write policies that apply to all its employees. Where local employment law or regulations require a different approach, the HR department will advise managers and colleagues.
- 4.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

5. Dignity at Work and Study

- 5.1 LSTM requires all members of our community to treat each other with respect, courtesy, and consideration at all times. Every member of the LSTM community has the right to expect respectful behaviours from others and the responsibility to behave correspondingly. Everyone is encouraged to challenge or raise concerns relating to behaviours which are contrary to this policy.
- 5.2 LSTM does not tolerate bullying, harassment, racial harassment, sexual harassment/misconduct, and victimisation relating to the workplace, extended workplace, and study environments. LSTM will investigate formal complaints and take appropriate action on all complaints observed and/or brought to our attention. Legitimate, reasonable, and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.
- 5.3 We will ensure all prospective colleagues and students are aware of the behaviours expected of them before they join LSTM through our code of conduct. The expectations communicated through the code of conduct will continue throughout their time with LSTM.

5.4 We will provide training for staff, managers, and long-term students (i.e., PGR) and managers in playing their part in creating an inclusive culture, including (but not limited to):

- Mandatory e-learning modules for all staff, refreshed on a regular basis,
- Sessions focusing on specific issues or behaviours relating to creating an inclusive environment (e.g., microaggressions and being an active bystander),
- Training for managers on their responsibilities for maintaining an inclusive culture in their teams.
- Specialist training for those involved in the investigation or hearing of complaints related to Dignity at Work and Study
- Dedicated training for colleagues who are Dignity and Respect Champions.

6. Raising Concerns

- 6.1 Everyone at LSTM has a part to play in maintaining a culture which supports our community to thrive and flourish. Therefore, we strongly encourage and will support all members of the LSTM community to report any incidences of unacceptable behaviour towards them or that they witness.
- 6.2. Concerns can be raised informally or formally, to a manager, a member of HR, or through the independent external reporting mechanism: this route also supports anonymous reporting. In addition, a team of trained Dignity & Respect Champions will be appointed, across LSTM, to be a confidential point of contact for anyone considering raising a complaint. The champions can provide information and signpost to support and resources but will not investigate the concerns.
- 6.3 We will not condone unacceptable behaviour or ignore reports. All concerns reported will be treated seriously, including anonymous reports, those made by witnesses to unacceptable behaviour, and management concerns. All concerns will be investigated promptly, sensitively, fairly, in a timely manner, providing support to all parties throughout.
- 6.4 LSTM will take appropriate action against colleagues who threaten, attempt or act in any way to stop reporting or whistleblowing.
- 6.5 Where complaints are made anonymously via the independent external reporting mechanism, LSTM will take action such as training, briefings and updating policies and monitoring patterns of behaviour. However anonymous reporting restricts the ability to investigate or initiate proceedings against named individuals. LSTM recognises that in some cases, complainants may be concerned about revealing their identity to a respondent and will put steps in place to provide protection and support.

- 6.6 HR will not disclose the identity of any complainant to a respondent without obtaining prior consent.
- 6.7 During any investigation, after raising a concern, LSTM would not normally grant anonymity to any participant in the formal process, except in extreme circumstances e.g., where there is a serious risk to safety. In such circumstances, LSTM may be able to protect the complainant's identity from other parties during any investigation or formal process. Complainants would need to provide their details to HR/the investigating officer to discuss appropriate steps, and provide support, and implement any steps to maintain safety.
- 6.8 In situations when LSTM is obliged to act, anonymity is not guaranteed for example, Risk of Health and Safety, Safeguarding concerns, and any other statutory requirements.
- 6.9 We will assess the risk to all parties involved in or directly affected by the complaint/report, as well as any risk to our wider colleague and student communities and take appropriate actions.
- 6.10 We may invite external consultants to take part in investigation and/or disciplinary panels if we feel it is appropriate, based on the nature of the concerns raised.
- 6.11 Following an investigation, any cases where the unacceptable behaviour is proven will be dealt with under the LSTM Disciplinary Policy and Procedure for colleagues and could lead to dismissal. For students, this will be dealt with under the LSTM Student Disciplinary Code and may lead to the student(s) being required to withdraw from the programme.
- 6.12 We do not believe that the burden of reporting should solely lie with the individual who has directly experienced unacceptable behaviour. Everyone in the LSTM community has a responsibility to report concerns and we encourage these to be raised in a timely manner (usually within 3 months following the incident).
- 6.13 Investigations will normally be undertaken in accordance with the *Raising and Resolving Dignity at Work* (for staff) and *Study* (for students) *Concerns Procedure*. Investigation into complaints of misconduct may also be conducted under the relevant Disciplinary Policy, e.g., where a complaint has been raised by a witness, a pattern of unacceptable behaviour has been identified or the organisation believes it is appropriate to do so (this list is not exhaustive)
- 6.14 Complaints raised in a global context may require a different approach to take account of cultural sensitivities, individual needs and varying legal frameworks. All complaints will be dealt with in a manner which upholds

the guiding principles of this policy, and which is appropriate for the circumstances and context. Separate guidance will be developed for LSTM's strategic hubs; individual complaints will be dealt with on a case-by-case basis.

6.15 Further details on how we will respond to complaints can be found in the following documents:

- Procedure for Raising and Resolving Dignity at Work Complaints (staff)
- Raising and Resolving Dignity at Study Concerns Procedure (Students)

7. Other

- 7.1 Some acts of harassment may amount to a criminal offence, e.g., hate crime or certain sexual misconduct cases. If a complaint is made that may amount to a criminal offence support will be offered via the HR Representative to report a matter to the police if they choose to do so.
- 7.2 The complainant's wishes should always be respected: if they choose not to report then in the vast majority of cases, this will be respected. In a small number of exceptional circumstances, LSTM may determine that the matter should be reported, e.g., where the personal safety of the complainant or others is at risk. This decision will only be taken in conjunction with the Global HR Director and the Safeguarding Lead.
- 7.3 We will not use NDAs (non-disclosure agreements) or confidentiality clauses that prevent members of the LSTM community from speaking out about harassment or other unacceptable behaviour. We wish to ensure that all our colleagues and students are safe and supported and would consider the use of confidentiality clauses in such circumstances to be wholly unacceptable.
- 7.4 LSTM takes complaints of bullying, harassment, and victimisation seriously. Complaints which are found to be frivolous, vexatious, or malicious may be dealt with under LSTM's Disciplinary Procedure.

8. Monitoring

- 8.1 We will report the anonymised outcome of concerns/reports raised and feedback lessons learned to LSTM Executive Group, Safeguarding Oversight Committee, E&I Committee (and relevant subsidiary committees) on a regular basis.
- 8.2 Our Human Resources team will monitor the effectiveness of the policy and review our approach as necessary.

Appendix A - Definition of Terms

1. Unacceptable Behaviour

- 1.1 LSTM is a higher education institution committed to the values of open debate and exchange of ideas. We are committed to providing an environment where individuals can act in accordance with the right to academic freedom within the law.
- 1.2 Behaviour that is offensive to one individual may not be to another, but most of the time people are able to judge correctly how they should behave. Differences of opinion are to be respected, although there are occasions when behaviour can become undermining and destructive. On these occasions individuals should be entitled to point this out without becoming subjected to a violation of their dignity.
- 1.3 Unacceptable behaviour is any behaviour that is unwanted, unwelcome and undermines an individual's dignity at work or study or has the effect of creating an intimidating or hostile environment.
- 1.4 Behaviour may be perceived as unacceptable even if there was no intent to cause offence. Equally, behaviour which has this intent is unacceptable, no matter the effect it has on the targeted individual(s). Behaviour may also be unacceptable where it is not directed at the individual it offends.
- 1.5 It may constitute a pattern of repeated behaviours in which individual incidents are borderline, but which taken together, breach the bounds of acceptability. The behaviour does not need to be ongoing; a single event of unreasonable behaviour is enough for the individual to make a complaint.
- 1.6 It can take the form of physical, verbal, and non-verbal conduct, including via on-line, mobile phones and cameras and via social and other forms of media. Examples of unacceptable behaviour can be found in Appendix B.
- 1.7 Unacceptable behaviour should not be confused with management carried out in a reasonable manner, including legitimate, constructive, and fair feedback and actions in relation to performance and conduct, either informally or through disciplinary or other formal procedures.

2. Harassment, including Racial Harassment and Sexual Misconduct

- 2.1 Harassment (as defined by Section 26 of the Equality Act 2010) includes unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, or offensive environment because of, or connected to, one or more of the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation
- Marriage or civil partnership
- Pregnancy and maternity
- Other forms of discrimination beyond the Equality Act

2.2 Under our definition we also understand harassment to include, domestic violence and abuse (which can also involve control, coercion, and threats) and stalking experienced by an individual. (for any Safeguarding concerns, please refer to LSTM's Safeguarding Policy)

2.3 We would also consider harassment to include any incidents of physical violence towards another person(s) on the basis of a protected characteristic and hate crimes, such as those criminal offences, which are perceived by the victim or any other person to be motivated by hostility or prejudice, based on a person's disability or perceived disability (not all of which are visible); race or perceived race; or religion or perceived religion; sexual orientation or perceived sexual orientation, or gender identify or perceived gender identity.

2.4 Sexual misconduct relates to all unwanted conduct of a sexual nature. This includes, but is not limited to:

- Sexual harassment (as defined by Section 26 (2) of the Equality Act 2010)
- Unwanted contact which creates an intimidating, hostile, degrading, humiliating or offensive environment (as defined by the Equality Act 2010)
- Assault (as defined by the Sexual Offences Act 2003)
- Rape (as defined by the Sexual Offences Act 2003)
- Physical unwanted sexual advances (as set out by the Equality and Human Rights Commission: Sexual Harassment and the law, 2017)
- Intimidation or promising resources or benefits in return for sexual favours (as set out by the Equality and Human Rights Commission: Sexual Harassment and the law, 2017)
- Distributing private and personal explicit images or video footage of an individual without their consent (as defined by the Criminal Justice and Courts Act 2015)

2.5 Racial Harassment

Relates to all unwanted conduct which is related to an individual's colour, nationality (including citizenship), ethnic or national origins. Key definitions outlining different forms of racism are detailed below.

Racism

"Institutional racism is reflective of a set of discourse and systemic practices that disadvantage on the basis of race or ethnicity. Ordinarily, the premise for institutional racism has historically been set in societal constructs and state systems and workplace cultures" - Professor Jason Arday.

Anti Blackness and Colourism

Anti-blackness refers to the deeply ingrained and systemic prejudice, bias, discrimination, and hostility directed towards people of African descent, commonly referred to as Black individuals or communities. It is a form of racism that specifically targets and marginalises Black people, often resulting in social, economic, and political inequalities. Anti-blackness can manifest in various ways, both overt and subtle, and can be found in interpersonal interactions, institutions, policies, media representations, and cultural attitudes.

Key aspects of anti-blackness include:

1. **Stereotyping:** Black people have historically been subjected to negative stereotypes that portray them as inferior, dangerous, lazy, or unintelligent. These stereotypes perpetuate harmful beliefs and attitudes about Black individuals and contribute to biased perceptions.
2. **Discrimination:** Anti-blackness leads to unequal treatment and discrimination in areas such as housing, education, employment, criminal justice, and healthcare. Black individuals often face barriers and disadvantages that limit their opportunities and well-being.
3. **Systemic Racism:** Anti-blackness is embedded in the structures of society, resulting in systemic racism that systematically disadvantages Black individuals and communities. This can be seen in disparities in income, education, representation, and access to resources.
4. **Cultural Appropriation:** Anti-blackness can manifest in the appropriation of Black culture without proper acknowledgement or respect. This perpetuates harmful stereotypes and reduces the cultural contributions of Black communities to mere commodities.
5. **Microaggressions:** These are subtle, everyday interactions that communicate derogatory messages or assumptions about Black individuals. They can be unintentional but still contribute to a hostile and unwelcoming environment.
6. **Colourism:** Within the context of anti-blackness, colourism refers to the discrimination and bias based on skin colour within the Black

community itself. Lighter-skinned individuals may experience privileges or advantages over darker-skinned individuals, perpetuating divisions.

7. **Media Portrayals:** Media often perpetuates anti-black stereotypes and narratives that reinforce negative perceptions. This can lead to the misrepresentation and underrepresentation of Black individuals in mainstream media.
8. **Misogynoir** - the specific hatred, dislike, distrust, and prejudice directed toward Black women. This is where sexism and racism intersect to target Black women.

Islamophobia

is any distinction, exclusion, or restriction towards, or preference against, Muslims (or those perceived to be Muslims) that has the purpose or effect of nullifying or impairing the recognition, enjoyment, or exercise, on an equal footing, of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of public life?

Antisemitism

The International Holocaust Remembrance Alliance (IHRA) working definition of antisemitism is:

- “Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”
- IHRA [examples of Antisemitism](#) include (this list is not exhaustive)
 - Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
 - Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
 - Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
- This definition of Antisemitism is adopted by LSTM subject to the following further clarification points, the first two of which were recommended by the Home Affairs Select Committee in 2016:
 - It is not antisemitic to criticise the government of Israel, without additional evidence to suggest antisemitic intent.
 - It is not antisemitic to hold the Israeli government to the same standards as other liberal democracies, or to take a particular interest in the Israeli government’s policies or actions, without additional evidence to suggest antisemitic intent.
 - It is not antisemitic to propose alternative concepts of statehood (for instance proposals of shared statehood or challenging the concept and value of “statehood”) without additional evidence to suggest antisemitic intent.

Sexism

Sexism is a type of prejudice or discrimination based on beliefs about a person's sex or gender.

2.6 Homophobia

“Homophobia is the fear or dislike of someone, based on prejudice or negative attitudes, beliefs, or views about lesbian, gay or bi people. This can also include denying somebody's lesbian, gay, or bi identity or refusing to accept it. Homophobia may be targeted at people who are, or who are perceived to be, lesbian, gay or bi” – Stonewall.

2.7 “Ableism

Is a word for unfairly favouring non-disabled people. Ableism means prioritising the needs of non-disabled people. In an ableist society, it is assumed that the “normal” way to live is as a non-disabled person.” – Sense UK Disability Charity

- 2.8** Although we have highlighted specific examples of types of harassment in points 2.4 to 2.7 of this document, we acknowledge that these are not exhaustive.
- 2.9** Our definitions include harassment and sexual misconduct through any medium, including, for example, online.
- 2.10** A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group as the jokes create an offensive environment.
- 2.11** Harassment & context may include (this list is not exhaustive):
 - Unwanted physical conduct or "horseplay", including touching, pinching, pushing, and grabbing,
 - Continued suggestions for social activity after it has been made clear that such suggestions are unwelcome,
 - Sending or displaying material that is e.g. racist, pornographic, or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet),
 - Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless),
 - Racist, sexist, homophobic, transphobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender,
 - Outing or threatening to out someone as a member of the LGBTQ+ community,

- Offensive e-mails, text messages or social media content,
- Mocking, mimicking, or belittling a person's disability, or
- Microaggressions (see section 3)
- This list is not exhaustive.

2.12 Although a colleague may not have intended their behaviour to be offensive, the effect it has on others is key. Where a behaviour violates an individual's dignity or creates an intimidating, hostile degrading, humiliating or offensive environment for that individual, it falls under the definition of harassment.

3. Microaggressions

3.1 Microaggressions are subtle 'everyday' verbal or non-verbal behaviours, whether intentional or unintentional, which communicate hostile, derogatory, or negative messages, based on protected characteristics (see 2.1).

3.2 Examples of microaggressions could be:

- Assuming that an individual is not from the country you're based in due to their skin colour or accent,
- Making assumptions of how someone will/should be or behave based on stereotypes,
- Assuming that work experience or qualifications gained outside the country you are from are superior/inferior,
- Making statements about groups of people based on a stereotype.
- Refusing to address an individual by their preferred pronouns when this has been made clear.
- This list is not exhaustive.

4. Bullying

4.1 Bullying is defined by [ACAS](#) as "*offensive intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.*" Power does not always mean being in a position of authority but can include personal strength and the power to coerce through fear or intimidation. Bullying is a form of abuse that can make a person feel fearful, vulnerable, upset, humiliated, undermined, or threatened.

4.2 Bullying behaviour can be directed at others regardless of their role relative to the person displaying the bullying behaviours within a formal structure. Bullying behaviour can be directed at individuals at the same level, a lower level, or a higher level within the formal structure, by an individual towards a group of people, or a group of people towards an individual.

4.3 Bullying can take the form of physical, verbal, and non-verbal conduct. Bullying may include:

- Physical or psychological threats,
- Overbearing and intimidating levels of supervision,
- Inappropriate derogatory remarks about someone's performance,
- Gaslighting – subtle, manipulating behaviour intended to control an individual or situation which leads to feelings of being undermined, excluded and loss of trust impacting confidence and performance.
- This list is not exhaustive.

4.4 The management of performance, including legitimate, reasonable, and constructive criticism of an individual's performance or behaviour, or reasonable instruction given in the course of employment will not amount to bullying on their own.

5. Victimisation

5.1 Victimisation refers to less favourable treatment, (or subjecting to a detriment) of someone who has complained or given information about discrimination or harassment or supported someone else's complaint. It also applies if the treatment applies where there is a belief that the individual intends to complain or provide information but has not yet done so.

6. Discrimination

6.1 Discrimination can be direct or indirect.

6.2 Direct discrimination is defined by the Equality Act 2010 as the less favourable treatment of a person because of a protected characteristic (see 2.1) that:

- They possess (ordinary direct discrimination),
- That is possessed by someone they are associated with (direct discrimination by association), or
- They are thought to have (direct discrimination by perception).

6.3 Indirect discrimination is where a provision, criterion or practice is applied equally to a group of employees but has the effect of putting those who will share a certain protected characteristic (see 2.1) at a particular disadvantage when compared to others without the characteristic in the group and this cannot be lawfully justified.

Appendix B – Examples of Unacceptable Behaviour

The below lists are intended to give examples of unacceptable behaviour and are not exhaustive.

Non-Verbal

- Exclusion from normal workplace conversation, activities, or social events
- Deliberate exclusion from meetings or communications without good reason
- Making inappropriate gestures, mimicking behaviour, or staring
- Making assumptions based on a protected characteristic
- Sending emails, displaying, or creating material containing offensive content
- Taking and or sending photographs
- Making derogatory remarks which people may find offensive (i.e., about personal appearance)
- Preventing individuals progressing by intentionally blocking promotion or training opportunities, including considering a person too old/young for an opportunity
- Wearing clothing or accessories with offensive motifs, slogans, suggestive phrases, or images
- Setting unrealistic targets or objectives
- Deliberately overloading a competent worker
- Making it unnecessarily difficult for colleagues to conform to their religion or beliefs
- Refusing to work with someone or isolating them e.g., because of their race, colour, nationality, heritage, sexual orientation, or trans status (whether actual or perceived), or because of their connection with someone with that protected characteristic

Verbal

- Insulting someone
- Questioning ability inappropriately
- Shouting at, being sarcastic towards, ridiculing or demeaning others
- Spreading rumours or malicious lies
- Verbally mimicking a person
- Using inappropriate terms or making inappropriate comments relating to a personal characteristic e.g., racist, sexist, homophobic, transphobic, ageist or disability-related
- Criticizing and/or being intolerant of differences, e.g., accent, clothing, hairstyle, customs, and beliefs
- Using derogatory nicknames or name-calling
- Making rude or abusive comments
- Actual or threatened disclosure of a protected characteristic, e.g., sexual orientation or trans status
- Unwanted comments on dress and/or appearance, including where this is linked to ethnicity, culture and/or religion
- Requests for sexual favours
- Making verbal threats
- Using humour to put another person or group of people down, e.g., telling racist jokes or jokes which are related to any other protected characteristic
- Discussing harmful stereotypes, e.g., around race, religion, gender, sexual orientation, disability
- Making threats or comments about job security without foundation
- Threats of physical abuse
- Whistling or other sexually suggestive noises/remarks, flirting or innuendo

- Intrusive questioning about a person's marital status, sexual orientation, ethnic origin, religion, culture, or disability
- Behaviour which incites racial hatred (including repeated questions about someone's national or ethnic origin)

Physical

- Unwanted touching, groping or the invasion of personal space (getting too close)
- Unwanted sexual advances
- Inappropriate practical jokes
- Physical or sexual abuse and/or exploitation
- Persistent unwelcome contact including text messages, emails, phone calls, gifts
- Spying, stalking, or pestering
- Taking and/or sending photographs or 'upskirting' an individual
- Damaging, defacing, or removing another person's property

Appendix C - Linked Policies and Documents (Staff)

- Procedure for Raising and Resolving Dignity at Work Complaints
- LSTM Disciplinary Policy and Procedure
- LSTM Code of Conduct
- LSTM Protecting Children and Vulnerable Adults Policy and Procedure
- LSTM Safeguarding Students Policy
- LSTM Acceptable Use of Computer and IT Facilities

Appendix D – Linked Policies and Procedures (Students)

- Raising and Resolving Dignity at Study Concerns Procedure
- LSTM Student Complaints Procedure
- LSTM Student Charter
- LSTM Code of Conduct
- LSTM Protecting Children and Vulnerable Adults Policy and Procedure
- LSTM Safeguarding Students Policy
- LSTM Acceptable Use of Computer and IT Facilities
- LSTM Student Disciplinary Code
- LSTM Regulations for Postgraduate Taught and Postgraduate Research degrees

Equity Impact Assessment (EIA)

(Please refer to the [EIA guidance document](#))

Equity Impact Assessment: Section 1 (to be completed for all Policies)

Title of policy/process:	<i>Dignity at Work and Study Policy and accompanying Raising and Resolving Dignity at Work Concerns Procedure.</i>
Policy owner job title:	<i>Head of People Services</i>
Date of EIA:	<i>21st January 2022 and 5th September 2022, 12th September 2023</i>
Policy relevant to: Staff / students / visitors etc:	<i>All members of the LSTM community</i>
Summary of any consultation with stakeholders (e.g. date and type of consultation):	<i>N/A – organisation-wide consultation took place in Summer 2023</i>
This policy has been checked for accessibility on: (date)	<i>21st January 2022 and 5th September 2022, 12th September 2023</i>

I confirm that this policy does/does not impact people, and therefore does not require an EIA (delete as appropriate)	<u>Does impact people (continue to Section 2)</u>
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Section 2: To be Completed if your policy has an impact on people, or if you are unsure of the impact of a Policy or Procedure and need to engage with stakeholders (note: you do not need to use this template – only use it if it's helpful)

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/ negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
1.1	Is it likely that the policy or framework could have a positive or negative impact on a group depending on their <i>ethnicity</i> ?	Yes (positive)	<p><i>States that colleagues of all ethnic groups must be treated with dignity and respect.</i></p> <p><i>Colleagues from ethnic minorities may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <i>Trained Dignity & Respect Champions will be made available to provide colleagues with information on how to report.</i> <i>Our BAME staff network can support colleagues.</i> <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i> <i>External panel members may be used where this is appropriate.</i> <i>Collect & analyse EDI data to identify the</i>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/ negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
				<i>disproportionate number of complaints and outcomes affecting groups from marginalised backgrounds.</i>
1.2	Is it likely that the policy or framework could have a positive or negative impact on a group depending on their gender?	Yes (positive)	<p><i>States that colleagues of all genders must be treated with dignity and respect.</i></p> <p><i>Colleagues may experience unacceptable behaviour related to their gender.</i></p>	<ul style="list-style-type: none"> <i>Trained Dignity & Respect Champions will be made available to provide colleagues with information on how to report.</i> <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i> <i>External panel members may be used where this is appropriate.</i>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/ negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
1.3	Is it likely that the policy or framework could have a positive or negative impact on people during <i>pregnancy or maternity</i> ?	Yes (positive)	<p><i>States that all colleagues must be treated with dignity and respect.</i></p> <p><i>Colleagues may be more likely to experience unacceptable behaviour during pregnancy and/or maternity.</i></p>	<ul style="list-style-type: none"> <i>Trained Dignity & Respect Champions will be made available to provide colleagues with information on how to report.</i> <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i> <i>External panel members may be used where this is appropriate.</i>
1.4	Is it likely that the policy or framework could have a positive or negative impact on people with disabilities?	Yes (positive and possible negative)	<p><i>States that all colleagues must be treated with dignity and respect, regardless of any disability.</i></p> <p><i>Additional support during the procedure may be required for colleagues with a disability or long-term health condition. Currently 5% of colleagues have declared they have a disability or long-term health condition.</i></p>	<ul style="list-style-type: none"> <i>Requirement under UK law for reasonable adjustments to be made - see sections 2.8 of procedure. HR team will liaise with colleagues who have requested additional support.</i> <i>Trained Dignity & Respect Champions will be made</i>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/ negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
			<p><i>Colleagues with disabilities may be more likely to experience unacceptable behaviour.</i></p>	<p><i>available to provide colleagues with information on how to report.</i></p> <ul style="list-style-type: none"> • <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i> • <i>External panel members may be used where this is appropriate.</i>
1.5	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>sexual orientation</i> ?	Yes (positive)	<p><i>States that colleagues of all sexual orientations must be treated with dignity and respect.</i></p> <p><i>Colleagues from the LGBTQ+ community may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> • <i>Trained Dignity & Respect Champions will be made available to provide colleagues with information on how to report.</i> • <i>Our LGBTQ+ staff network can support colleagues.</i> • <i>Anonymous reports can be made through our Freedom to Speak Up mechanism.</i>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/ negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
				<ul style="list-style-type: none"> <i>External panel members may be used where this is appropriate.</i>
1.6	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>religion, belief, or lack thereof?</i>	Yes (positive)	<p><i>States that colleagues must be treated with dignity and respect regardless of any or no religion or belief.</i></p> <p><i>Colleagues with certain religions or beliefs may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <i>Trained Dignity & Respect Champions will be made available to provide colleagues with information on how to report.</i> <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i> <i>External panel members may be used where this is appropriate.</i>
1.7	Is it likely that the policy or framework could have a positive or negative impact on people who are <i>trans</i> ?	Yes (positive)	<p><i>States that trans colleagues must be treated with dignity and respect.</i></p> <p><i>Trans colleagues may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <i>Trained Dignity & Respect Champions will be made available to provide colleagues with information on how to report.</i>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/ negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
				<ul style="list-style-type: none"> <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i> <i>External panel members may be used where this is appropriate.</i>
1.8	Is it likely that the policy or framework could have a positive or negative impact on people due to their age?	Yes (positive)	<p><i>States that colleagues of all ages must be treated with dignity and respect.</i></p> <p><i>Younger and older colleagues may be more likely to experience unacceptable behaviour.</i></p>	<ul style="list-style-type: none"> <i>Trained Dignity & Respect Champions will be made available to provide colleagues with information on how to report.</i> <i>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</i> <i>External panel members may be used where this is appropriate.</i>

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/ negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
1.9	Is it likely that the policy or framework could have a positive or negative impact on people due to <i>marriage or civil partnership</i> ?	Yes (positive)	<i>States that intrusive questioning about a person's marital status is unacceptable behaviour</i>	

Ref.	Other groups who could be impacted (acquired characteristics)	Yes (positive/ negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
2.1	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>contract type (part-time or full-time)</i> ?	Yes (positive)	<i>The policy and procedure cover all colleagues, regardless of their contract type.</i>	
2.2	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>contract status (fixed-term or indefinite)</i> ?	Yes (positive)	<i>The policy and procedure cover all colleagues, regardless of their contract status.</i>	
2.3	Is it likely that the policy or framework could have a	Yes (positive)	<i>The policy and procedure cover all colleagues, regardless of their grade.</i>	

Ref.	Other groups who could be impacted (acquired characteristics)	Yes (positive/negative) / no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
	positive or negative impact on people due to <i>their grade</i> ?			
2.4	Is it likely that the policy or framework could have a positive or negative impact on <i>people with dependents or caring responsibilities</i> ?	Yes (positive)	<i>The policy and procedure cover all colleagues, regardless of their dependents or caring responsibilities.</i>	

Conclusion

<p>a. What issues are highlighted by the EIA process? Summarise the action you will take to mitigate against them, or how you've changed your policy to remove the issues.</p>	<p>Reasonable adjustments may need to be made for colleagues with a disability or long-term health condition to support accessing the procedure. This is recorded in the <i>Raising and Resolving Dignity at Work Concerns Procedure</i> and will be facilitated by the HR department.</p> <p>Trained Dignity & Respect Champions will be available to all colleagues to provide information on how to report.</p> <p>Anonymous reports can be made through our independent external Freedom to Speak Up mechanism.</p> <p>External panel members may be used where this is appropriate during investigation of complaints and any subsequent disciplinary process.</p> <p>Risk assessments will be made when complaints are received to support colleagues.</p>
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<p>b. If you consider intersectionality of protected characteristics, are the issues compounded? Summarise the action you will take to mitigate against the issues.</p>	<p>Colleagues may experience unacceptable behaviour relating to more than one protected characteristic.</p> <p>The actions stated in section a. of this EIA (above) will apply.</p>
<p>c. Are there are groups of people who aren't recorded so far, who may be adversely impacted by this policy/framework?</p>	<p>No</p>
<p>d. Are there any opportunities within the policy/framework to particularly promote equity?</p>	<p>The aim of the policy and procedure is to promote dignity for all at LSTM and provide processes for issues to be dealt with in a supportive manner.</p>
<p>e. Does the policy/framework need amendment after the outcome of the EIA process?</p>	<p>No, however will be reviewed again after organisation-wide consultation.</p>
<p>f. Timeline for amendment, review, and further consultation with key stakeholders.</p>	<p>Consultation took place in summer 2023 with staff.</p>
<p>g. Any additional comments</p>	<p>N/A</p>

Once Section 1 & 2 are completed, copy, and paste into your policy template, with any confidential or restricted data (or identifying numbers of individuals [<5]) redacted, to allow for sharing of good practice across the school via the internal Policy Hub. Please ensure you refer to job roles and group names, and not individual's names.

Please share the final document with inclusion@lstmed.ac.uk prior to internal publication.