

**Comprehensive Source of Information (CSI) on
Harassment and Sexual Misconduct
Office for Students (OfS) Condition E6**

London Campus

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1. Single Comprehensive Source of Information (CSI) on Harassment and Sexual Misconduct

This document summarises the School's policies and procedures on student harassment and sexual misconduct and the support available. This constitutes the School's single comprehensive source of information (CSI) on harassment and sexual misconduct. It is designed to comply with Condition E6 of the Office for Students' (OfS) regulatory framework.

2. Scope

Our policies cover all incidents of harassment and sexual misconduct affecting students, including conduct by staff towards students and between students. This policy is applicable to all employees, workers and out-sourced services employees at the School, including, but not limited to, our Professional Services Employees, Faculty Employees, Visiting Lecturers, Language Teachers, Casual Workers, Research Assistants, and any other individual working on site, e.g. outsourced services such as Facilities, Cleaning, and Security.

3. Statement of Commitment

The School is committed to creating a safe and respectful learning environment, free from harassment and sexual misconduct. We do not tolerate any form of such behaviour and will take all necessary steps to prevent and address it through evidence-based, comprehensive measures that protect all members of our community while upholding lawful freedom of speech and academic freedom.

4. Definitions

4.1 Harassment

Harassment (**as defined by Section 26 of the Equality Act 2010 AND Section 1 of the Protection from Harassment Act 1997**) includes unwanted behaviour or conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Harassment can take many forms, including but not limited to:

- Unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- Offensive emails, text messages or social media content;
- Mocking, mimicking or belittling a person's disability.
- Offensive or intimidating comments or gestures, or insensitive jokes or pranks
- 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 if the jokes create a hostile or offensive environment for them.
- Following the OfS (Office for Students) definition, the School will consider harassment to include domestic violence and abuse (which can also involve control, coercion, threats) and stalking. The School would also consider harassment to include any incidents of physical violence towards another person(s) based on a protected characteristic (as defined in the Equalities Act 2010) 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; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity.
- In assessing whether conduct constitutes harassment, the School considers both the subjective perception of the person affected and an objective standard of reasonableness, taking into account the circumstances of the case. This approach ensures that individuals are protected from harassment, while also safeguarding lawful freedom of speech and academic freedom.

4.2 Sexual Misconduct

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 conduct 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)¹
- 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)²
- 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).

¹ Sexual harassment and the law: Guidance for employers, Equality and Human Rights Commission, 2017

² See www.equalityhumanrights.com/en/publication-download/sexual-harassment-and-harassment-worktechnical-guidance

As outlined in EHRC guidance on freedom of expression ³, published in February 2019, exposure to course materials that students might find offensive or unacceptable is unlikely to constitute harassment.

4.3 Sexual Harassment

Sexual harassment is unwanted and unwelcome words, conduct or behaviour of a sexual nature that has the purpose or effect of creating an intimidating, embarrassing, hostile, degrading, humiliating or offensive environment for the recipient. It can include but is not limited to:

- catcalling;
- following;
- making unnecessary and unwanted physical contact;
- sexual jokes, innuendo and comments;
- giving unwelcome personal gifts;
- wolf-whistling;
- leering;
- derogatory gestures and comments;
- unwelcome comments about a person's body or clothing;
- asking unwelcome questions about a person's sex life and/or sexuality;
- engaging in unwelcome sexual propositions, invitations and flirtation;
- making somebody feel uncomfortable through displaying or requesting sexual favours (including with implied or overt promises of preferential treatment or threats concerning present or future employment status);
- sharing sexual material such as calendars, photographs or videos.

Sexual harassment does not necessarily occur face-to-face – it can be in the form of emails, visual images (such as sexually explicit pictures on walls in a shared environment), social media, phone, text messages, and image-based sexual abuse such as revenge porn and up-skirting. [The IT Acceptable Use Policy](#) must be followed and is accessible at the student portal and on the School's website.

5. Relationships between staff and students

5.1 Close personal relationship

This excludes intimate relationships, but relates to circumstances where involvement with, or frequency of interactions between a student and a staff member are in excess of normal staff/student relationships, for example, a close family friend, or a relative, or a financial dependence.

5.2 Intimate relationship

A consensual romantic relationship, emotional, physical, and/or sexual in nature, in person, or online, which goes beyond the bounds of a normal platonic or workplace relationship. This is

³ See www.equalityhumanrights.com/en/publication-download/freedom-expression-guide-higher-education-providers-and-students-unions-england

inclusive of brief relationships and one-off occurrences, through to marriage and life partnerships, irrespective of gender, gender identity or sexual orientation

5.3 Position of trust

Any staff member working closely with young people or adults at risk, is in a position of trust.
Any staff member responsible for other staff members is in a position of trust.

6. Prohibition and Management of Staff- Student Intimate Relationships

- 6.1. All staff members **are prohibited from pursuing or entering into an intimate relationship** with any student. Staff members in breach of this prohibition will be subject to disciplinary action under The School's Disciplinary Policy.
- 6.2. If there is an existing intimate or close personal relationship between a staff member and a student who is due to join The School, the staff member must declare the relationship through the conflict of interest process.
- 6.3. If there has been a previous intimate or close personal relationship between a staff member and a student, the staff member is responsible for declaring the relationship through the conflict of interest process.
- 6.4. All staff members are strongly discouraged from allowing close personal relationships to develop between them and any student, but particularly in relation to students for whom they are in a position of trust.
- 6.5. Should a close personal relationship become apparent, it must be declared without delay, under the conflict of interest policy.
- 6.6. Failure of a member of staff to disclose the existence of a relationship between them and a student will result in disciplinary action being considered against the member of staff concerned.
- 6.7. Where a conflict of interest is declared, the declaration will be reviewed with the relevant Director, Programme Manager or Dean, considered on a case by case basis, and a decision made as to whether action is required.
- 6.8. Should action be required to address the conflict, this will be communicated to the member of staff, and actioned accordingly by the relevant department, as instructed by the Director, Programme Manager or Dean.
- 6.9. Should the conflict of interest be deemed outside acceptable boundaries, the outcome will be recorded on the employee's declaration, and communicated to them.

7. Reporting alleged cases of harassment and sexual misconduct

The School treats all reports of harassment and sexual misconduct with utmost seriousness. Such behaviour is never considered trivial.

Students can raise concerns informally and in confidence by contacting the Health and Wellbeing Team at wellbeinguk@escp.eu. Concerns are escalated to the Director of Student and Academic Services (London Lead for Inclusion and Diversity) for further action.

If the investigation determines that harassment or misconduct has occurred, appropriate action will be taken under the [*Student Code of Conduct and Disciplinary Procedure*](#). The complainant will be informed of the outcome of the investigation in line with data protection and procedural fairness.

In the event of unlawful harassment reported to the Director of Student and Academic Services (London Lead for EDI), the case will be reported to the police and relevant authorities as a matter of urgency where appropriate.

If there is an immediate risk to a student's safety, they should contact emergency services directly by calling **999**.

8. Investigation Procedures

The following School policies govern how allegations are formally investigated:

- [*Student Bullying and Harassment Policy*](#): outlines definitions, scope, and the School's preventative and response measures.
- [*Student Code of Conduct and Disciplinary Procedure*](#): governs how allegations against students are investigated.
- [*Staff Disciplinary and Grievance Procedures*](#): apply where students raise allegations against staff members.

All investigations are conducted fairly and sensitively, with due consideration to procedural rights, confidentiality, and wellbeing. The relevant procedures set out clear steps for investigation, potential outcomes, and routes of appeal:

- Appeals by students are addressed under the [*Student Appeals Policy*](#).
- Appeals by staff are addressed under the [*Staff Disciplinary and Grievance Procedures*](#).

9. Information Handling

Confidentiality will be observed throughout, and details of the matter and the names of the person making the complaint and the person(s) accused must only be disclosed on a "need to know" basis, as outlined in [*Student Bullying and Harassment Policy*](#).

10. Support for those affected

Under [*Student Bullying and Harassment Policy*](#), students who make complaints or who participate in good faith in any investigation must not suffer any form of unlawful retaliation or victimisation as a result.

Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under the Student Code of Conduct and Disciplinary procedure.

The claimant or victim will immediately be directed by the Director of Student and Academic Services to the Wellbeing team for support. Students can also contact [International SOS](#) 24/7 for support. Students can access the service directly by calling International SOS +44 (0)20 8762 8082 or through the Assistance App.

Support for Students facing allegations:

The School recognises that being the subject of a harassment or sexual misconduct allegation can be distressing. Students facing allegations will be treated with respect, dignity, and in accordance with the principles of procedural fairness. Support will be offered throughout the process, without pre-judging the outcome. Students facing allegations will have access to:

- A named point of contact for guidance and communication
- Emotional support through the Health and Wellbeing Team
- Information on the disciplinary or investigative process
- Where appropriate, temporary precautionary measures (such as a no-contact arrangement) may be implemented to protect the wellbeing of all parties. These are not disciplinary penalties and do not imply wrongdoing.
- Students will also be informed of their rights, the process timelines, and be provided with clear documentation outlining what to expect.

All parties involved in a case will be offered support and are expected to engage with the process respectfully and confidentially.

11. External Support

As well as the internal support available for students that report an incident it is important to be aware of external agencies that can provide specialist advice and support. Below is a list of organisations support agencies that can provide support.

- [NHS Support after Rape and Sexual Assault](#)
- [Rape Crisis](#) 0808 802 9999 (24/7 helpline)
- [Women's Aid](#)
- [The Survivors Trust](#)
- [Male Survivors Partnership](#)
- [24-hour National Domestic Abuse Helpline](#) 0808 2000 247 (24/7 helpline)
- [Samaritans](#) 116 123 (24/7 helpline)
- [Hate Crime Support](#)
- [Stop Hate UK](#)
- [Transgender Hate Crime](#)
- [Disability Hate Crime](#)
- [Action against stalking](#)

Emergency Contacts:

- Emergency Services: 999
- Police Non-Emergency: 101
- NHS 111: 111

12. Freedom of Speech

ESCP Business School believes that an atmosphere of free and open discussion is essential to its life and work. Such an atmosphere can be achieved only if all concerned behave with necessary tolerance and avoid needlessly offensive or provocative action and language. Such an atmosphere requires that lawful speech be protected even where it may be controversial or offensive to some, in line with statutory freedom of speech duties. ESCP Business School is, however, not obliged to admit members of the public to talks taking place on its premises and must take account of other legal obligations which may require it to have regard to what is said on its premises. Speakers whose expression constitutes incitement to violence, racial hatred, terrorism, or other unlawful activity fall outside the protection of this policy and relevant laws.

See School's policy on [Freedom of Speech](#)

13. Training and awareness

The School provides mandatory training for both staff and students to ensure understanding of our policies and the behaviours that constitute harassment and sexual misconduct. This includes:

- For Students:
 - During induction, training on awareness on sexual harassment and, recognising what constitutes harassment and ways of reporting it.
 - From 1st August 2025, students will be required to complete a mandatory interactive online course on sexual harassment and misconduct.
- For Staff:
 - A range of policies are available for staff for awareness around relationship between staff and students, bullying and harassment.
 - From AY 25/26 staff will be required to complete a mandatory online specialist training on E6 condition.

14. Non-Disclosure and Restrictive Clauses

The School does not use non-disclosure agreements (NDAs) or any restrictive provisions in student contracts that would prevent individuals from disclosing experiences of harassment or sexual misconduct

15. Accessibility and Publication

This CSI is published on London Campus webpage and is easily accessible to students and staff. Students and staff will be informed about this CSI in writing at least once a year. This will also be made available on Blackboard for students and on staff portal for staff.

16. Oversight and Governance

In line with the expectations of OfS Condition E6, appropriate oversight of the School's approach to harassment and sexual misconduct is maintained through established governance and reporting structures. These arrangements aim to support ongoing regulatory compliance while fostering a culture of accountability, transparency, and student safety.

Oversight involves periodic review of relevant policies and procedures, consideration of aggregated case data and student feedback, and the inclusion of harassment and misconduct matters within broader institutional monitoring. Training, reporting, and quality assurance mechanisms also contribute to internal evaluation and continuous improvement, with relevant updates shared through appropriate governance channels as needed.

17. Review

This CSI will be reviewed and updated at least annually or more frequently as needed.