



## INTRAPERSONAL AND SEXUAL CONDUCT POLICY

### 1. Introduction

#### **‘Do Only What you Love...Love what you Do.’**

Perhaps one of our Founder and President’s most iconic statements. But do we know what we like or even love, and are we always aware of our actions? If the answer is ‘yes,’ then you can be sure that you are living in tune with yourself and the world around you. ESE recognises that living in a multi-cultural and dynamic environment is both exhilarating and challenging, and as such - sometimes difficult to navigate.

The European School of Economics (ESE) is committed to creating a safe, inclusive, and respectful learning and working environment. Everyone is encouraged to express themselves freely and openly yet respectfully in the presence of others - acting as an actor would on stage the role that situation demands. Not always do we realise what is required of us. Considering this, we herein provide an overview of what we consider to be the proper terms of interaction between persons including but not limited to personal, professional and academic relationships and responsibilities.

The Office for Students defines a relevant individual as a member of staff who has direct academic responsibilities or direct professional responsibilities in relation to a specific student.

ESE realises that relationships are complex and come in many forms so to protect the rights, privacy and dignity of each student, a discreet yet robust support system is needed for the laying down of guidelines and the handling of possible misconduct. This policy outlines not only ESE’s guidance concerning relationships between relative individuals and students but its approach towards preventing, addressing, and responding to eventual, alleged and actual cases of misconduct.

While the mission of the European School of Economics contains its aim to guide all stakeholders, whether students, staff, lecturers or partners towards the discovery and expression of their own integrity, it is also recognised that there may be occasions when one abandons themselves to below-standard conduct. ESE has a zero-tolerance policy when the distraction of anyone infringes on the rights of others. Like [bullying](#), indiscretion, harassment and sexual misconduct are specific kinds of violations of rights, and ESE is committed to ensuring robust procedures first for prevention, but when need be for reporting, investigating, and addressing incidents.

### 2. Scope of the Policy

This policy applies to all members of the ESE community, including students, faculty, staff, contractors, and visitors. It outlines ESE’s views and practices concerning incidents that occur on ESE premises, at any organised work experience, during college-sponsored activities, and any off-campus behaviour that impacts ESE stakeholders.

### 3. Definitions

As per [section 26 of the Equality Act 2010](#) and [section 1 of the Protection from Harassment Act 1997](#), ESE follows the following definitions:

- Indiscretion: when defined boundaries are crossed and privileged or intimate information is shared by an individual, whether knowingly or recklessly, with the intention to favour or harm the individual in question. This includes a careless statement, a lapse in social etiquette, or an action that reveals a secret or leads to embarrassment or conflict.
- Consent: A clear, voluntary, and informed agreement to engage in a particular activity. Consent must be ongoing and can be withdrawn at any time.
- Harassment and sexual harassment: unwanted behaviour or conduct which 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; race; religion or belief; sex; and sexual orientation.
- Sexual Misconduct: Any unwanted or attempted unwanted conduct of a sexual nature, including but not limited to sexual harassment, sexual assault, coercion, stalking, indecent exposure, sharing intimate images without consent and rape.

### 4. Reporting and Support Mechanisms

ESE provides multiple channels for reporting incidents:

- Confidential Reporting Line: Available 24/7 for students and staff to report concerns anonymously if desired. WhatsApp number: +44 20 3778 0303
- Designated Harassment and Misconduct Officers: Trained staff members available for guidance and support. Each campus will identify one staff member who will be indicated at Induction. In most cases this will be within the student services office or be the Pastoral Care Officer if relevant.
- Formal Complaint Procedures: A structured process for investigating and addressing complaints, ensuring impartiality and confidentiality will be maintained. The procedures can be found in the [Harassment and Bullying Policy](#), and [Health and Safety Procedures](#) both part of the overarching Procedures for the Safeguarding of the Individual (currently being drafted).
- Support Services: Access to counselling, medical support, and academic adjustments for affected individuals. Each centre will identify in induction sessions the list of recommended local services where students can go if they feel they need professional support. The degree to which the school is involved in this will be decided on a case-by-case basis and usually in collaboration with the campus manager and, on consent of the student, with parents.

### 5. Investigation and Disciplinary Procedures

- All reports will be handled sensitively, confidentially, and in line with due process.
- Investigations will be conducted by trained professionals with clear timelines for resolution.



- ESE will clearly outline the circumstances in which an investigation will be carried out and ensure transparency in its investigatory process - details are provided in the Procedures for the Safeguarding of the Individual (currently being drafted).
- The investigatory process will follow principles of natural justice, ensuring fairness, impartiality, and transparency for all parties involved.
- Investigations will adhere to established timescales, with a clear decision-making process that is communicated at the outset.
- ESE will communicate the potential range of outcomes resulting from an investigation, including disciplinary actions such as warnings, suspension, expulsion, or termination of employment.
- Individuals directly affected by the decision, including complainants, respondents, and other relevant parties, will be informed of the outcome and provided with a rationale for the decision.
- A clear appeals mechanism will be available to those wishing to challenge an outcome, with defined timelines and review procedures.
- ESE will align its investigatory procedures with the [freedom of speech policy](#) to ensure fair and lawful handling of cases.
- The university will ensure that any necessary involvement of external authorities is handled appropriately while offering full support to affected individuals.

### ***Investigation and Disciplinary Procedures:***

ESE is committed to handling all reports of sexual harassment sensitively, confidentially, and in accordance with due process and the principles of natural justice. The investigatory process will ensure fairness, impartiality, and transparency for all parties involved.

**Initial Response:** All reports will receive a formal acknowledgment within 3 working days of submission.

**Triage & Risk Assessment:** A preliminary review and risk assessment will be completed within 5 working days, determining whether immediate support, protective measures, or external reporting is necessary.

**Formal Investigation:** If a formal investigation is warranted, it will be conducted by trained and impartial investigators. The process will aim to be completed within 30 calendar days, with extensions permitted in exceptional circumstances.

### ***Decision-Making Process:***

Investigations will culminate in a **written report** outlining the findings, which will be reviewed by a designated panel or decision-maker trained in handling harassment cases.

A decision will be issued within 10 working days of the investigation report being finalised.

All parties directly affected - the complainant, respondent, and others as appropriate - will be informed of the decision in writing, with a clear rationale provided.

### **Possible Outcomes:**

Outcomes may include no action, informal resolution, formal warnings, suspension, expulsion (for students), or termination of employment (for staff). The full range of potential outcomes will be outlined in the institutional disciplinary policy.

### **Appeals Process:**

Parties have the right to **appeal within 10 working days of being notified** of the outcome.

Grounds for appeal may include procedural error, new evidence, or disproportionate outcome.

Appeals will be reviewed by a separate panel and decided **within 20 working days of submission**.

### **External Reporting and Support:**

Where appropriate, ESE will liaise with external authorities (e.g., police or safeguarding bodies) in accordance with the victim's wishes and applicable legal obligations. Throughout, support and safeguarding measures will be offered to all affected individuals.

## **6. Prevention and Training**

- **Mandatory Training:** All students and staff must complete training on harassment and sexual misconduct awareness. Training is outlined in the Procedures for the Safeguarding of the Individual (in progress).
- **Bystander Intervention Programme:** Encouraging the community to take proactive steps to prevent and challenge inappropriate behaviour.
- **Clear Communication:** Policies and Procedures will be widely published and communicated through Induction sessions, websites, and eventual workshops (part of Procedures for the Safeguarding of the Individual).

## **7. Prohibition of Non-Disclosure Agreements (NDAs)**

ESE does not use NDAs to silence individuals who report harassment or sexual misconduct. Individuals retain their right to share their experiences as part of their healing process and advocacy efforts.

## **8. Staff-Student and Power-Imbalanced Relationships**

While intra-student relationships do not pose threats to academic and professional progression there can be cases of indiscretion where students have either parental or romantic relationships with staff.

- ESE discourages relationships where a power imbalance might exist and will take measures to safeguard the integrity of the academic, professional and social environments.



- Staff members must disclose any relationships with students whether romantic or otherwise (parental etc) to ensure transparency and avoid conflicts of interest.

### **9. Monitoring and Review**

This policy will be reviewed annually to ensure compliance with legal requirements and best practices. ESE will collect anonymized data on incidents to evaluate the effectiveness of its policies and procedures.

### **10. Contact Information**

ESE will provide at all times a physical person who will respond confidentially to the needs of any student or staff member who request support at [qualityassurance@eselondon.ac.uk](mailto:qualityassurance@eselondon.ac.uk) -