

## London Academy for Applied Technology (LAAT)

### Abuse of Power Code of Practice

**Policy title:** Abuse of Power Code of Practice

**Document reference:** LAAT-GOV-ABP-001

**Department / Function:** Governance / HR / Academic

**Policy Owner:** Academic Dean, Dr Manoj Ponugubati

**Oversight Committee:** People & Culture Committee

**Approving Body:** Board of Governors (final approval)

**Version:** v1.0

**Status:** Adopted

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**Review date:** Annually from approval date

**Supersedes:** None

#### Regulatory Alignment with Office for Students (OfS) Conditions

This Abuse of Power Code of Practice forms part of the London Academy for Applied Technology's (LAAT) academic governance, safeguarding, and student protection framework. It supports the creation of a safe, fair, and respectful academic environment in which power imbalances are responsibly managed, professional boundaries are upheld, and students and staff are protected from exploitation, coercion, harassment, or misconduct. The Code provides institutional assurance that LAAT meets regulatory expectations for student protection, ethical governance, transparency, and effective risk management.

In relation to **Condition C – Student Protection and Consumer Protection**, this Code ensures that LAAT takes appropriate and proactive steps to protect the interests, welfare, and safety of students. It establishes clear behavioural expectations, disclosure requirements, safeguarding routes, and reporting mechanisms for concerns relating to abuse of power, harassment, grooming, or sexual misconduct. It ensures students receive clear, accessible information on how to raise concerns, how cases will be handled, and what support and redress routes are available (**C1 – Consumer Protection Law; C2 – Student Complaints Scheme; C3 – Student Protection Plan**).

In relation to Condition **E – Management and Governance**, this Code ensures that LAAT has effective governance arrangements, internal controls, and accountability structures to manage risks arising from power imbalances and professional boundary breaches.

Oversight by senior management and governance committees, documented disclosure and mitigation processes, safeguarding escalation routes, and audit-ready records ensure that concerns are managed transparently, consistently, and with appropriate independence and authority (**E1 – Public Interest Governance; E2 – Management and Governance; E3 – Accountability**).

In relation to **Condition F – Provision of Information**, this Code ensures that information provided to students, staff, and external stakeholders about expected standards of conduct, reporting routes, safeguarding procedures, and disciplinary processes is accurate, transparent, and accessible. Secure information controls are applied to disclosures, investigations, and management decisions to protect confidentiality and data integrity (**F1 – Provision of Information; F2 – Information Controls**).

This Code is further informed by statutory safeguarding duties, **Equality Act 2010 requirements, Sexual Offences Act 2003** provisions on abuse of trust, and sector good-practice guidance on staff–student relationships and professional boundaries in UK higher education. It is implemented through LAAT’s safeguarding, HR, and academic governance arrangements and aligned with Plymouth Marjon University partnership expectations for student protection, ethical conduct, and institutional integrity.

## Terms of Reference

### 1. Purpose

This Code of Practice sets out the expectations, standards, and controls through which LAAT prevents, identifies, and addresses abuse of power within its higher education provision and wider institutional operations.

#### **Purpose Statement:**

The purpose of this Code is to ensure that authority within LAAT is exercised responsibly, ethically, and transparently. It provides clear behavioural standards and reporting mechanisms to protect students, staff, and external stakeholders from misuse of power, while safeguarding institutional integrity, student wellbeing, and the reputation of LAAT and its validating partner.

### 2. Scope

This Code applies to all individuals acting on behalf of London Academy for Applied Technology (LAAT), regardless of their role, seniority, or contractual status. This includes all LAAT employees, whether academic, professional, or operational staff, as well as

agency staff, contractors, visiting lecturers, consultants, governors, committee members, and any other individuals representing LAAT in an official capacity.

The Code applies to all professional, academic, managerial, and supervisory activities undertaken on behalf of LAAT. This includes teaching, assessment, student support, disciplinary and institutional decision-making processes, recruitment and employment activities, appraisal and workload allocation, and interactions with students, staff, and external partners.

The Code applies across all LAAT campuses, online and blended learning environments, and any off-site or placement-related activities connected to LAAT provision. Where any conflict arises between this Code and Plymouth Marjon University's partner regulations or policies, the University's requirements will take precedence.

### 3. Definitions

**Abuse of Power:** The misuse of authority, position, or influence to unfairly advantage or disadvantage another person, whether intentionally or unintentionally.

**Power Imbalance:** A situation where one party holds greater authority, control, or influence than another.

**Detriment:** Any harm, disadvantage, pressure, or negative consequence experienced by an individual, including academic, professional, emotional, or reputational harm.

### 4. Principles

LAAT is committed to the following principles:

- Professional integrity in the exercise of authority
- Fairness and transparency in decision-making
- Protection of students from misuse of authority
- Respect, dignity, and inclusion in all interactions
- Accountability for conduct and decision-making
- Confidence to raise concerns without fear of reprisal

### 5. Governance, Committees and Oversight

The **Board of Governors** holds ultimate responsibility for ensuring LAAT operates with integrity and in compliance with OfS governance expectations.

The **People & Culture Committee** has delegated responsibility for oversight of this Code.

**The People & Culture Committee will:**

- Approve and periodically review this Code
- Monitor reported concerns and trends relating to abuse of power
- Seek assurance that appropriate controls and staff training are in place
- Receive anonymised reports and recommend improvements

- Escalate significant risks to the Board of Governors where necessary

## 6. Policy Statement

### 6.1 General Standards

All individuals acting on behalf of London Academy for Applied Technology (LAAT) must exercise their authority responsibly, ethically, and transparently. Misuse of position, inappropriate influence, or conduct that creates unfair advantage or disadvantage is not permitted.

This standard supports LAAT's commitment to good governance, aligns with Office for Students expectations for effective institutional management, and reflects Plymouth Marjon University's partner requirements for staff professionalism and student protection.

Abuse of power may include:

- Pressuring students or staff for personal, academic, or professional gain
- Undue influence over assessment, progression, or disciplinary decisions
- Intimidation, coercion, or threats
- Retaliation against individuals raising concerns
- Exploiting dependency or vulnerable relationships

### 6.2 Staff–Student Relationships

Staff must maintain appropriate professional boundaries with students. Any behaviour compromising objectivity, fairness, academic integrity, or student welfare is prohibited and must be managed in line with LAAT governance and validating partner expectations.

### 6.3 Reporting and Protection

LAAT will ensure staff and students can raise concerns in good faith without fear of victimisation or detriment. Concerns will be addressed through fair, confidential, and timely procedures, supporting LAAT's student protection and governance obligations.

## 7. Standard Operating Procedure (SOP)

This Standard Operating Procedure (SOP) sets out the structured process through which concerns relating to abuse of power are reported, assessed, investigated, and resolved. The procedure ensures that concerns are handled fairly, transparently, and proportionately, in accordance with LAAT's governance arrangements, safeguarding responsibilities, and Office for Students (OfS) expectations for effective institutional management and oversight.

### 7.1 Process Overview

This procedure defines how LAAT identifies, receives, assesses, investigates, and resolves concerns relating to abuse of power. It ensures that reports are managed consistently, confidentially, and without fear of victimisation or detriment, while safeguarding students, staff, and institutional integrity.

## **7.2 Step-by-Step Process**

### **Step 1 – Receipt of Concern**

Concerns may be raised by students or staff through informal or formal reporting routes, including direct reporting to HR, Governance, line management, or designated reporting channels.

### **Step 2 – Initial Triage**

The HR / Governance function conducts an initial triage within five (5) working days to confirm receipt, assess completeness, and determine whether the concern meets the threshold for further action.

### **Step 3 – Risk and Safeguarding Assessment**

Where required, a risk and safeguarding assessment is undertaken to identify any immediate risks to individuals or the institution and to determine appropriate interim measures.

### **Step 4 – Formal Investigation**

Where the threshold is met, a formal investigation is initiated in accordance with LAAT's disciplinary, safeguarding, or governance procedures.

### **Step 5 – Outcome Decision**

Following investigation, outcome decisions are approved by the appropriate authorised senior staff member or committee, in line with delegated authority arrangements.

### **Step 6 – Outcome Notification**

Relevant parties are informed of the outcome and any resulting actions. Communication is provided in writing and handled sensitively and confidentially.

### **Step 7 – Record Management**

All cases are recorded securely and managed in accordance with UK GDPR and LAAT data retention requirements. Case data is used for monitoring and trend analysis.

### **Step 8 – Reporting and Oversight**

Anonymised reports on abuse of power concerns, trends, and risks are submitted to the People & Culture Committee. Serious or systemic risks are escalated to the Board of Governors where necessary.

## **7.3 Escalation and Timelines**

Concerns involving serious misconduct, safeguarding risk, or systemic governance issues are escalated promptly to the People & Culture Committee and, where appropriate, to

the Board of Governors. Target timescales for each stage of the process are defined in operational guidance to ensure timely and proportionate resolution.

#### **7.4 Templates and Records**

The following standard templates and records support implementation of this procedure:

- Abuse of Power Concern Reporting Form
- Investigation Report Template
- Outcome Notification Letter
- Risk Register Entry

### **8. Monitoring, Compliance and Review**

#### **8.1 Monitoring**

Anonymised data on abuse of power concerns, trends, and outcomes is reported annually to the People & Culture Committee as part of LAAT's governance and risk oversight arrangements.

#### **8.2 Compliance**

Failure to comply with this Code may be addressed through appropriate disciplinary, contractual, or governance procedures, applied fairly and proportionately.

#### **8.3 Review**

This Code will be reviewed annually, or sooner where required by regulatory changes, validating partner updates, or institutional risk considerations.

### **9. Responsible People / Roles include**

- **Academic Dean (Policy Owner):** Dr Manoj Ponugubati  
Overall accountability for implementation of this Code of Practice and alignment with regulatory and validating partner expectations.
- **HR Manager:** Ms Deedepya Galla  
Provides administrative oversight of reporting, guidance on interpretation of the Code, coordination of investigations, and staff conducts processes.
- **Governance Officer:** Ms Agrima Shankar  
Maintains records of reported concerns, supports committee reporting, and ensures procedural compliance and confidentiality.
- **Investigation Lead:** To be appointed as required  
A suitably senior and independent staff member(s), not previously involved in the matter under review, appointed to investigate concerns and determine outcomes in accordance with approved procedures.

## List of People & Contacts

Role	Name	Email ID
<b>Academic Dean (Policy Owner)</b>	Dr Manoj Ponugubati	manoj@laat.ac.uk
<b>HR Manager</b>	Ms Deedepya Galla	deedepya@laat.ac.uk
<b>Governance Officer</b>	Ms Agrima Shankar	agrima@laat.ac.uk
<b>Investigation Lead</b>	Appointed as required	N/A

## 10. List of Documents

Key supporting documents include:

- Abuse of Power Concern Reporting Form
- Investigation Report Form
- Outcome Notification Letter

This policy should be read in conjunction with

- Staff Code of Conduct
- Plymouth Marjon University – Student Regulations Framework

## 11. Evidence

- Abuse of Power Concern Reporting Form
- Investigation Report Form
- Outcome Notification Letter
- Staff Code of Conduct
- Plymouth Marjon University – Student Regulations Framework

Evidence Item	Purpose / What it Demonstrates	Relevant OfS Condition(s)
<b>Abuse of Power Concern Reporting Form</b>	Provides a clear, accessible, and confidential mechanism for staff and students to report concerns relating to abuse of power, safeguarding risks, or misconduct. Demonstrates early identification of student protection risks and effective reporting routes.	<b>C1</b> ( <i>Consumer Protection Law – fair processes and clear information</i> ), <b>C5</b> ( <i>Treating students fairly</i> ), <b>E2</b> ( <i>Effective management and governance processes</i> )
<b>Investigation Report Form</b>	Records investigation processes, evidence considered, findings, and decisions in a structured and	<b>E2</b> ( <i>Management and governance</i> ), <b>E3</b> ( <i>Accountability for</i>

	auditable manner. Demonstrates internal controls, accountability, and proper management of misconduct or safeguarding cases.	<i>compliance), C5 (Fair treatment in academic and disciplinary processes)</i>
<b>Outcome Notification Letter Template</b>	Confirms outcomes of investigations, actions taken, and available routes for review or appeal. Demonstrates transparency, fair treatment, and student consumer protection compliance.	<b>C1</b> (Consumer protection law – transparent procedures), <b>C5</b> (Treating students fairly), <b>E2</b> (Effective management and governance)
<b>Staff Code of Conduct</b>	Defines expected professional behaviour, ethical standards, and boundaries. Demonstrates governance controls, ethical management culture, and prevention of abuse of power or misconduct.	<b>E1</b> (Public interest governance), <b>E2</b> (Management and governance), <b>E3</b> (Accountability)
<b>Plymouth Marjon University Student Regulations Framework</b>	Ensures alignment with validating partner academic regulations, assessment governance, and student protection processes. Demonstrates maintenance of sector-recognised academic standards and controlled academic decision-making.	<b>B5</b> (Sector-recognised standards), <b>E1</b> (Public interest governance), <b>E2</b> (Management and governance)