



Policy on Protection against Harassment of Woman at the Workplace & Policy on Sexual Harassment in
institution Of Higher Learning

Prepared By	Special Committee
Approved By	Academic Council
Version No.	2
Date of Issue	October 2020
Total Pages	15
Custodian	Registrar Office

BAQAI MEDICAL UNIVERSITY

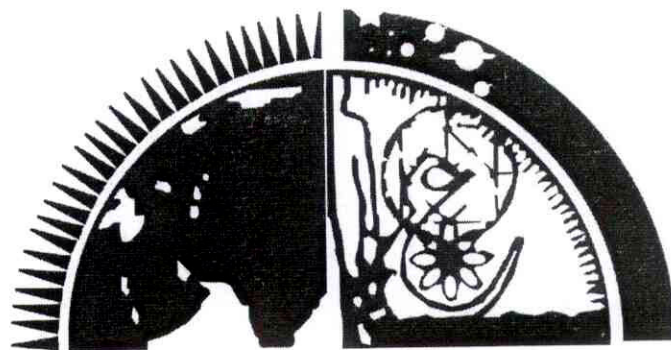
POLICY ON PROTECTION AGAINST HARASSMENT OF WOMEN AT THE WORKPLACE

&

POLICY ON SEXUAL HARASSMENT IN INSTITUTIONS OF HIGHER LEARNING

Version 2

2020



Baqai Medical University

CONTENTS

1. INTRODUCTION	3
2. PURPOSE	3
3. IMPLEMENTATION TIMELINE	3
4. POLICY STATEMENT	3
5. DEFINITION OF HARASSMENT	5
6. WHAT IS SEXUAL HARASSMENT?	5
7. STATEMENT OF PRINCIPLES	6
8. IN GENERAL: SEXUAL HARASSMENT DEFINED	6
9. SOME OF THE PUNISHABLE SEXUAL OFFENCES AT BMU	6
10. DESIGNATED RESOURCES	7
11. COMPLAINTS REPORTING	7
12. INTERIM MEASURES AND SPECIAL ARRANGEMENTS	8
13. SANCTIONS AND DISCIPLINARY MEASURES	8
14. THE INQUIRY COMMITTEE	9
15. INVESTIGATION & ADJUDICATION	10
16. CONFIDENTIALITY	12
17. RIGHT TO APPEAL	12
18. MALA FIDE ALLEGATIONS	13
19. PROTECTION AGAINST REPRISAL	13
20. SPECIAL CONSIDERATIONS REGARDING RELATIONSHIPS BETWEEN INDIVIDUALS	13
21. IMPLEMENTATION OF THE POLICY	13
22. MONITORING & EVALUATION	14

1. INTRODUCTION

The Baqai Medical University (BMU) recognizes its obligation to maintain high ethical standards across the breadth of its activities including equality of gender amongst faculty/staff and students.

Gender harassment, or gender-based harassment, is a practice of sex discrimination. It usually happens when one person harasses another for reasons relating to their gender or the gender with which they identify. In Pakistan legally after the directives given by the Federal Government, NADRA can register persons into one of the three genders.

The Provincial & Federal Ombudsman advised the BMU to formulate its policy on protection against harassment of women at the workplace [Ref: Protection Against Harassment of Women at the Workplace Act, 2010 (Act No.IV of 2010)] and also the Higher Education Commission through its “Policy Guidelines Against Sexual Harassment in Institutions of Higher Learning” advised BMU to formulate a proper policy document to safeguard the interests and rights of faculty, staff, and students.

The Act referred above, the HEC guidelines and BMU Act and policies framed from time to time shall be consulted for references, if required.

2. PURPOSE

This policy provides a framework to BMU for decision making on the protection of its employees and students and also safeguard and protect all its staff and students on sexual harassment issues.

3. IMPLEMENTATION TIMELINE

This policy shall be implemented immediately and will last till the constitution of any other approved policy or directives from the competent authority in this regard.

4. POLICY STATEMENT

- 4.1. Under the Act titled “Protection Against Harassment of Women at the Workplace Act, 2010 [Act No.IV of 2010]” the Baqai Medical University devised and adopted the following policy for its implementation with letter and spirit
- 4.2. BMU is committed to providing a safe environment for all its employees, especially for women, free from discrimination on any ground and harassment at work including sexual harassment. The University will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously, and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed anyone will face disciplinary action, including dismissal from employment as per guideline provided in the Act [Act No.IV of 2010]. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.
- 4.3. Anyone can be a victim of sexual harassment, regardless of their sex and the sex of the harasser. BMU recognizes that sexual harassment may also occur between people of the same sex. What matters is that sexual conduct is unwanted and

unwelcomed by the person against whom the conduct is directed.

4.4. This policy is applied to the actions by students, faculty, staff, other members of the BMU community (such as interns, residents, etc.) or third parties (such as service providers, visitors, etc.), when the misconduct occurs:

- a) On the BMU property (i.e. on campus) or in its immediate vicinity;
- b) Off the BMU property, if (i) the conduct occurs in connection with the BMU recognized program or activity or (ii) the conduct may create a hostile environment or pose a safety risk on campus; and
- c) Using the university's computing or network resources accessed from an off-campus location, which shall be deemed to have occurred on campus

4.5. As per Higher Education Commission (HEC) Policy Guidelines Against Sexual Harassment in Institutions of Higher Learning:

4.5.1. Sexual harassment is prohibited at BMU and constitutes a punishable offense under this policy.

4.5.2. Sexual harassment is demeaning to human dignity and is unacceptable in a healthy work environment specifically one in which scholarly pursuit may flourish. BMU will not tolerate the sexual harassment of any member of the BMU community and will strive through education and deterrence to create an environment free from such behavior on its premises.

4.5.3. BMU affirms the right of every member of its constituencies to live, study, and work in an environment that is free from sexual harassment. Behavior constituting sexual harassment as defined in this document is incompatible with standards of professional ethics and with behavior appropriate to an institution of higher learning.

4.5.4. BMU recognizes that as an academic and free community it must uphold its fundamental commitments to academic freedom along with freedom of expression and association. It will maintain an environment in which students and teaching and non-teaching staff can engage in free inquiry and open discussion of all issues without intimidation and harassment of others. The Harassment Monitoring Officer, like all other officers of the BMU, is obliged to uphold the same principles.

4.5.5. An academic and free community must also include freedom of movement and freedom of access to facilities and resources without fear of harassment, discrimination, or violence.

4.5.6. All persons entrusted with authority by the BMU have a particular obligation to ensure that there is no misuse of that authority in any action or relationship.

4.5.7. Sexual harassment is a serious human rights issue. It can be exacerbated by discrimination on other grounds of vulnerability such as gender, poverty, disability, race, religion, ethnic origin, or sexual orientation.

4.5.8. The BMU recognizes its legal and moral responsibility to protect all of its

members from sexual harassment and to take action if such harassment does occur. To these ends, it has developed a policy on, and procedures for, dealing with complaints of sexual harassment, including a range of disciplinary measures up to and including dismissal. It has also established an educational program to prevent incidents of sexual harassment.

- 4.5.9. The BMU prohibits reprisal or threats of reprisal against any member of the BMU community who makes use of this policy or participates in proceedings held under its jurisdiction. Any individual or body found to be making such reprisals or threats will be subjected to disciplinary action.
- 4.5.10. This policy and its procedures intended to prevent sexual harassment from taking place, and where necessary to act upon complaints of sexual harassment promptly, fairly, and with due regard to confidentiality for all parties concerned.
- 4.5.11. All Administrators, Deans, Managers, Department Chairs, Directors of Schools or Programs, and others in supervisory or leadership positions should be familiar with and to uphold this policy and its procedures along with informing members of their staff about its existence.
- 4.5.12. Notwithstanding this policy, individuals have the right to seek the advice and services of the Higher Education Commission's Cell for the prevention of sexual harassment.
- 4.5.13. All the actions categorized as sexual harassment when performed physically or verbally would also be considered as sexual harassment when done using electronic media such as computers, mobiles, internet, e-mails, etc.

5. DEFINITION OF HARASSMENT

“Harassment” means any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature or sexually demeaning attitude, causing interference with work performance or creating an intimidating, hostile or offensive work environment or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment.

[Ref: Protection Against Harassment of Women at the Workplace Act, 2010 (Act No. IV of 2010)]

6. WHAT IS SEXUAL HARASSMENT?

- 6.1. Sexual harassment is a reality which occurs in the classrooms, offices, research laboratories, and HEI environment in general. Sexual harassment may be overt or subtle and can range from visual signals or gestures to verbal abuse to physical contact along with hand or sign language to denote sexual activity, persistent and unwelcome flirting. Sexual harassment generally takes place when there is power or authority difference among persons involved (Student/Teacher, Employee/Supervisor, Junior Teacher/Senior Teacher, Research Supervisee/Supervisor).
- 6.2. Further, this also involves treating others unequally based on gender in work-related

or academic duties or programs and not providing female students with the same academic opportunities as male students or vice versa; this is also applicable to same-sex harassment (male/male, female/female).

- 6.3. The types of behavior constituting sexual harassment may vary in degree of severity. Its definition always has one key element: the behavior is uninvited, unwanted, and unwelcomed.
- 6.4. In Pakistani Universities relationships with a difference in power and authority can seriously affect the institutional working as well as the credibility of all involved.

[Ref: HEC Policy Guidelines Against Sexual Harassment in Institutions of Higher Learning]

7. STATEMENT OF PRINCIPLES

- 7.1. Sexual harassment is offensive sexual behavior by persons in authority towards those who can be benefitted or injured in an official capacity. Therefore, it is primarily an issue of abuse of power, not sex.
- 7.2. Sexual harassment is a breach of a trusting relationship that should be a sex-neutral and relaxed situation. It is unprofessional conduct and undermines the integrity of the employment relationship.
- 7.3. Sexual harassment is coercive behavior, whether implied or actual. It is unwanted attention and intimacy in a nonreciprocal relationship.
- 7.4. Sexual harassment is a violation of professional ethics.

8. IN GENERAL: SEXUAL HARASSMENT DEFINED

- 8.1. Unwanted sexual advances;
- 8.2. Unwelcome requests for sexual favors; and
- 8.3. Other behavior of a sexual nature where:
 - a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or participation in an HEI-sponsored educational program or activity;
 - b) Submission to or rejection of such conduct by an individual is used as a basis for academic or employment decisions affecting that individual;
 - c) Such conduct has the purpose or effect of unreasonably interfering with an individual's academic or work performance, or of creating an intimidating, hostile, or offensive educational or working environment.

9. SOME OF THE PUNISHABLE SEXUAL OFFENCES AT BMU

- 9.1. Asking female students to visit personal offices of their supervisors/authorities in-charge after office hours to discuss their grades and assignments.

- 9.2. Asking female students to meet supervisors/authorities in-charge out of the HEI premises with the promise of improvement in grades.
- 9.3. Financial and sexual gratification from undergraduate or graduate students (Ph.D., M.Phil., Masters) by their supervisors/teachers.
- 9.4. Intimidation of faculty/staff by students/colleagues to tarnish the reputation(character assassination) of faculty/staff.
- 9.5. Harassment by senior students of the junior students, female students, or minority students.
- 9.6. Unwelcome sexual advances whether they involve physical touching or not.
- 9.7. Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life.

10. DESIGNATED RESOURCES

- 10.1. The BMU shall designate at least two members of the BMU administration (the **Focal Persons**), at least one of whom shall be a woman, to offer support and immediate assistance to those who have experienced sexual harassment. Contact information of such individuals shall be easily available, including on the BMU website.
- 10.2. The BMU shall also constitute an Inquiry Committee to investigate and adjudicate any allegations of prohibited conduct (the **Inquiry Committee**) following the provision of Section 14 below. Those who have experienced sexual harassment may also contact members of the Inquiry Committee for support and advice.

11. COMPLAINTS REPORTING

- 11.1. A complaint may be lodged by any person who has experienced sexual harassment as defined in Section 6, 7, 8, & 9 that may be termed as "**Prohibited Conduct**" read with Section 4.4 (Policy Statement; **Jurisdiction**) of this policy, with either the Focal Person or with any member of the Sexual Harassment Inquiry Committee.
- 11.2. In cases in which the conduct in question falls within the scope of the 2020 Harassment Act, the affected person also has an option to submit a complaint to the Ombudsperson in accordance with the provisions of the 2010 Harassment Act.
- 11.3. If a complainant is reluctant to contact the Focal Persons or any members of the Inquiry Committee, the complainant may contact a colleague, instructor, the employment supervisor, manager, department chair, Dean or VC. It will be the responsibility of the individual contacted to report the case to the Inquiry Committee without identifying either the complainant or the alleged offender and to ask for advice on procedure and policy from them to find a solution if a solution is necessary.
- 11.4. Complainants shall be encouraged to submit complaints promptly, preferably within 3 months but no later than 12 months from the last date of the alleged harassment. An extension of up to 1 year may be granted by the Focal Persons or the Inquiry

Committee upon written request stating the reason for the delay in submitting the complaint.

11.5. All members of the BMU community are encouraged to report any instances of sexual harassment that they may have observed to the Focal Persons or the Inquiry Committee. To safeguard the campus community, BMU should investigate material violations of this policy even if a formal complaint has not been filed.

11.6. As soon as a complaint or report is received by one of the designated resources, it shall be shared by him or her (within 24 hours) with all Focal Persons and members of the Inquiry Committee for further action.

11.7. For minor violations, complainants may opt to make an informal complaint to either the Focal Person or the Inquiry Committee. The primary objective of the informal resolution mechanism is to take preventative action so that minor violations are detected early and an appropriate warning is given to the accused to stop the offending behavior before it reaches a higher degree of seriousness. If the incident reported through this mechanism constitutes prohibited conduct under Section 6, 7, 8, and 9 of this policy, the Inquiry Committee shall deal with the complaint accordingly.

12. INTERIM MEASURES AND SPECIAL ARRANGEMENTS

12.1. As soon as a complaint or report is received by designated resources or any member of the BMU administration, depending on the nature and seriousness of the offense, the Focal Persons shall take appropriate steps to provide interim measures that may be requested by the affected persons or as otherwise may be deemed appropriate. If the affected person is not satisfied with the measures taken, he or she may contact any member of the Inquiry Committee for necessary action. Interim measures include but are not limited to:

- a) adjustment in class or examination schedules, including to attend hearings;
- b) access to counseling services or other appropriate medical assistance;
- c) change in the work assignments;
- d) arrangement for any assessments or evaluations to be made by a neutral person;
- e) adjustment to the class schedule, including withdrawal from the course or changing the section;
- f) notifying the campus security officials (or law enforcement in case of serious violations) regarding the violation;
- g) impositions of a BMU wide order designed to prohibit contact or communication between certain persons;
- h) change of the housing arrangement of certain persons; or
- i) any other measures that may be deemed appropriate

13. SANCTIONS AND DISCIPLINARY MEASURES

13.1. Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- a. Verbal or written warning.
- b. Adverse performance evaluation
- c. Reduction in wages
- d. Transfer
- e. Demotion
- f. Suspension
- g. Dismissal

13.2. The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial.

13.3. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

13.4. In the case in which the respondent is a student, the following sanctions may be imposed:

a) In the case of minor violations, the student may be issued a warning or reprimand. These shall be considered when adjudicating future violations.

b) In case of more serious violations, the following formal sanctions may be imposed: disciplinary probation, withholding of degree for a period of time, suspension, or expulsion.

c) The following may be added to any of the penalties listed above:

campus service; relocation from campus housing; exclusion of the respondent from a designated portion(s) of BMU buildings or grounds, or one or more BMU designated activities, (provided such penalty is appropriate to the offense and where the penalty does not prevent the respondent from pursuing her/his studies); attending the educational program; inclusion of decision in the student's record, except in the case of the first instance of a minor violation (for up to seven years).

14. THE INQUIRY COMMITTEE

14.1. The Inquiry Committee shall be responsible for the investigation and adjudication of any complaint received in connection with the violation of this policy.

14.2. The Inquiry Committee shall be constituted as follows:

a) The committee shall consist of three members, at least one of whom shall be a woman and one of the members shall be a member of the senior management of BMU.

b) All members of the committee shall be employees of BMU and who will be appointed by the Vice Chancellor (the "VC") after the VC has taken nominations from senior members of the BMU administration. The VC may co-opt one or more members if required.

- c) Members of the committee shall be individuals who are known for being principled, credible, fair, gender-sensitive and have a strong character. They shall have no conflict of interest in particular cases and shall be impartial and unbiased.
- d) Members of the committee shall be appointed for a term of 3 years. No member shall serve for more than two consecutive terms. Former members will be eligible for reappointment after a lapse of three years.
- e) One of the members of the committee shall be appointed as the Chairman by the VC, whose duties shall include, but are not limited to: maintaining order during hearings, answering procedural questions, granting or denying adjournments, maintaining proper documentation of the proceedings, which shall constitute the official record and reporting recommendations of the committee to the VC. All these duties shall be undertaken in consultation with the committee members.
- f) In case a complaint is made against one of the members of the committee, that member shall be replaced by another (impartial member) for that particular case.

14.3. A BMU staff member shall be appointed to assist the Inquiry Committee. This work shall include responsibilities such as organizing meetings, acting as a liaison between the committee and the other parties involved, record keeping, making and updating a database to track the processing of complaint shall endeavor to provide training to members, and ensuring appropriate awareness-raising about the issue of sexual harassment at BMU.

15. INVESTIGATION AND ADJUDICATION

15.1. All complaints alleging Sexual Harassment shall be forwarded to the Inquiry Committee within 24 hours of being received by the Focal Persons or any other office of BMU.

15.2. As soon as it is reasonably practicable after receiving a complaint, the Inquiry Committee shall determine the alleged conduct in the complaint meets the criteria outlined in Sections 6, 7, 8, and 9 and Section 4.4. of this policy. If it is determined by a majority of the members of the Inquiry Committee that the alleged conduct meets the aforementioned criteria, a formal investigation shall be initiated.

15.3. In the absence of a formal complaint, if a serious violation of this policy is reported to the Inquiry Committee or a series of allegations against the same person are received, the Inquiry Committee may determine by a majority of the vote to initiate proceedings after notifying the VC.

15.4. After initiating the investigation, and not later than three days of the receipt of a written complaint, the Inquiry Committee shall:

- a) communicate to the accused the charges and statement of allegations leveled against him/her, the formal written receipt of which will be given;
- b) require the accused within seven days from the day the charge is communicated to him/her to submit a written defense and on his/her failure to do so without reasonable cause, the Committee shall proceed ex-parte; and
- c) enquire into the charge and may acquire and examine such oral or documentary evidence in support of the charge or defense of the accused as the Committee may consider necessary (including by summoning potential witnesses) and each party

shall be entitled to cross-examine the witnesses against him/her.

15.5. The following rules shall apply to the hearings conducted by the Inquiry Committee:

- a) All hearings shall be closed hearings;
- b) The Inquiry Committee will hear statements from the complainant(s) and respondent(s), the witnesses if any (as required) and study any other documents and/or evidence as presented by the relevant parties or collected in the process of conducting inquiry;
- c) The Inquiry Committee shall have the discretion to limit testimony and questioning of witnesses to conducting inquiry;
- d) The Chair of the Inquiry Committee shall have the power to compel a witness to attend, and the complainant(s) and/or respondent(s) may request the Chair's aid in the regard;
- e) The complainant and the respondent may at any stage of any of the procedures outlined in this policy be represented and/or accompanied by another person of his/her choice;
- f) The Committee shall have the right to acquire any relevant piece of evidence to further their understanding of the case and the relevant parties, witnesses and administration are required to provide them with this documentation and/or evidence to facilitate the investigation;
- g) Objective documentation of the proceedings of the Inquiry Committee shall be maintained where high confidentiality of the records and other such material shall be upheld at all times;
- h) The respondent shall be allowed to cross-question the complainant and witnesses unless the committee decides otherwise;
- i) Where any procedural matter is not dealt with in this policy, the Inquiry Committee may be guided by the principles of fairness, establish any appropriate procedure.

15.6. Members of the BMU community must cooperate in an investigation, and refusal to cooperate may result in disciplinary action. There may be circumstances in which the complainant may wish to limit their participation in the proceedings. The complainant shall not be subject to discipline, but the BMU may be obligated to proceed with the investigation.

15.7. Following the formal hearing, the members of the Inquiry Committee shall deliberate and determine the validity of the complaint based on the totality of the circumstances. The presence or absence of evidence cannot always be the sole criterion on which a judgment can be made. The credibility of statements and context must be kept in mind during the deliberations. The committee members will reach a decision unanimously or by a majority after the deliberations. Where the complaint is found to be valid, the Committee will recommend an appropriate penalty.

15.8. The Inquiry Committee shall complete the inquiry and recommend its final decision within 30 days. It shall then send its decision to the VC giving its findings in writing by recording reasons thereof (which shall include any note of dissent) for

endorsement and action. Recommendation of the Inquiry Committee shall be implemented within seven days.

16. CONFIDENTIALITY

16.1. Confidentiality shall be enjoined on the Focal Persons, the Inquiry Committee, and all others involved in the process. This does not preclude the reasonable and discreet disclosure of information to elicit the facts of the case or to implement and monitor properly the terms of any decision.

16.2. The Focal Persons, members of the Inquiry Committee, and their support staff shall be subjected to administrative disciplinary action for inappropriate breaches of confidentiality on their part.

16.3. All notes and records arising in connection with an investigation shall be maintained in a confidential file at BMU.

17. RIGHT TO APPEAL

17.1. Both the complainant and the respondent shall have a right to appeal the decision of the Inquiry Committee within 30 days from the date of notification of the decision.

17.2. In cases in which the conduct falls within the scope of the 2010 Act, the aggrieved party shall have an option to file an appeal to the Ombudsman in accordance with the provisions of the 2010 Act.

17.3. There shall be a three-member appellate body (the "Appellate Body") appointed by the VC that shall include at least one senior member of the BMU administration (at the level of Dean or equivalent) and at least one of the members of which shall be a woman. No member of the Inquiry Committee shall concurrently be a member of the Appellate Body. In case the complaint had been made against one of the members of the committee, the member shall be replaced by another (impartial member) for that particular case.

17.4. Appeal to the Appellate Body against the decision of the Inquiry Committee can be filed on the following grounds:

- a) the alleged conduct does or does not fall within the scope of this policy;
- b) the Inquiry Committee has taken a decision without consideration of the material information;
- c) the adjudication process followed by the Inquiry Committee was procedurally unfair.

17.5. To reach its decision, the Appellate Body may communicate with the parties, the members of the Inquiry Committee or other members of the BMU community as it deems fit.

17.6. The Appellate Body may, on consideration of the appeal and any other relevant material, confirm, set aside, vary or modify the decision within 30 days in respect of which such appeal is made, and shall communicate the decision to both the parties, the VC and the Inquiry Committee.

18. MALA FIDE ALLEGATION

- 18.1. False allegations of sexual harassment made out of malice or intent to hurt the reputation of the person(s) against whom the complaint is filed are to be dealt with as serious offenses. Making mala fide allegation of sexual harassment knowing it to be false, whether in a formal or informal context, is a serious offense under this policy.
- 18.2. If the Inquiry Committee determines that a false allegation is made in the complaint with mala fide intent, it may recommend appropriate action against the complainant by sending its findings to the VC (by recording reasons thereof and including any note of dissent) for endorsement and action. In cases in which the conduct falls within the scope of the 2010 Act, the Inquiry Committee may recommend the handing over of such cases to the Ombudsperson for taking further action against the complainant who made the false allegation with mala fide intent.

19. PROTECTION AGAINST REPRISAL

- 19.1. BMU shall not allow reprisal or threats of reprisal against any member of the BMU community who makes use of this policy (formally or informally). BMU shall also prohibit such threats or actions against anyone who participates (e.g. testifies, assists, etc.) in proceedings held under its jurisdiction.
- 19.2. Retaliation or any other action against the complainant of sexual harassment is to be taken seriously under the provisions of this policy. All allegations of retaliation would be investigated formally under the purview of this policy, and if substantiated, would result in appropriate disciplinary action.

20. SPECIAL CONSIDERATIONS REGARDING RELATIONSHIPS BETWEEN INDIVIDUALS

- 20.1. In contrast with sexual harassment, the personal relationship among consenting adults of the BMU community that do not breach the social and cultural norms of the society is, in general, a private matter.
- 20.2. Under the policy, it is highly inappropriate for any member of the community to establish an intimate relationship with a student, subordinate or colleague on whose academic or work performance he or she will be required to make professional judgments. The policy requires that the individual may not involve themselves in such conduct as the professional responsibility for supervision or oversight would be affected in such cases. Relationships with a difference in power and authority can seriously affect the institutional working as well as the credibility of all involved. In particular, intimate or romantic relationships between faculty members and students (whether at the undergraduate or the graduate level) shall be prohibited.

21. IMPLEMENTATION OF THIS POLICY

- 21.1 BMU will ensure that this policy is widely disseminated to all relevant persons. It will be uploaded on the university website. All new employees must be made aware of the content of this policy as part of their induction into the university.
- 21.2 .It is the responsibility of every person in an administrative position to ensure that all

his/her employees are aware of the policy.

22. MONITORING AND EVALUATION

- 22.1 BMU recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.
- 22.2 **Focal Persons**, Administrators, Counselors, and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done yearly. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.