

# ANTI-HARASSMENT POLICY

## Barrett Hodgson University

### Objective

Barrett Hodgson University strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the University should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Employees should be able to work and learn in a safe, yet stimulating atmosphere. The accomplishment of this goal is essential to the mission of the University. For that reason, BHU will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, the University will seek to prevent, correct and discipline behavior that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not take place. Barrett Hodgson University, in compliance with all applicable federal, state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the Laws stated in the “**Protection against Harassment of Women at the Workplace Act, 2010**” and “**HEC Policy Guidelines against Sexual Harassment in Institutions of Higher Learning**”.

### Nature of Harassment

Barrett Hodgson University prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce a teacher, a student, staff member etc. or any person working for or on behalf of BHU. Verbal taunting (including racial, ethnic, sectarian and political slurs) that, in the employee’s opinion, impairs his or her ability to perform his or her duty is included in the definition of harassment.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person’s nationality, origin, race, color, religion, gender, sexual orientation, age, body, disability or appearance, including epithets, slurs and negative stereotyping.
- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital or other protected status.

Barrett Hodgson University strictly prohibits any harassing behavior, such as:

a) **Personal Harassment** is any behavior that is found to be offensive to an individual or endangers an individual's job unnecessarily, and undermines the performance of that person.

b) **Sexual Harassment** is any unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. It can be either on a one time basis or in a continuous series of incidents, however minor. Sexual harassment is coercive and one-sided and both males and females can be victims.

c) **Racial Harassment** is a form of race discrimination which includes racial jokes, ethnic slurs, offensive or derogatory comments, or other verbal or physical conduct based on an individual's race or color. Such conduct may create an intimidating, hostile, or offensive working environment, or interfere with the individual's work performance.

d) **Sexist Harassment** is any unwanted comments, sexist statements, slurs, jokes, sexist graffiti and literature including articles, pictures and posters.

### **Discrimination**

It is a violation of Barrett Hodgson University's policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, color, national origin, age, religion, disability status, gender, sexual orientation, gender identity, genetic information or marital status. Discrimination of this kind may also be strictly prohibited by a variety of federal, state and local laws, included in the "**Protection against Harassment of Women at the Workplace Act, 2010**" and "**HEC Policy Guidelines against Sexual Harassment in Institutions of Higher Learning**".

Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

### **Anti-Harassment Committee:**

A team comprising of the following members will function as Anti-harassment Committee:

- 1) Chairperson
- 2) Conveyer
- 3) Female faculty member

### **Complaint procedure**

BHU has established the following procedure for lodging a complaint of harassment, discrimination or retaliation. The University will treat all aspects of the procedure confidentially to the extent reasonably possible.

1. An individual who feels harassed, discriminated or retaliated against may initiate the complaint process by filing a complaint in writing with **BHU's Human Resource (HR) Department or Dean of the respective faculty**. No formal action will be taken against any person under this policy unless **the committee** has received a written and signed complaint containing sufficient details to determine if the policy may have been violated. The complainant (the employee making the complaint) may obtain the complaint form from the **HR Department**. If an employee or student becomes aware that harassment or discrimination is occurring, either from personal observation or as a result of an employee's

coming forward, the witness should immediately report it to the **Dean or Member of the Anti-Harassment Committee**.

2. Within five working days of receiving the complaint, the HR will notify the person(s) charged [hereafter referred to as “respondent(s)”] of a complaint and initiate the investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
3. During the investigation, the selected committee, together with 2 other members will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
4. Within 15 working days of the complaint being filed (or the matter being referred to the **Anti-Harassment Committee**), the members of the committee or other person conducting the investigation will conclude the investigation and submit a written report of his or her findings to the University.
5. If it is determined that harassment or discrimination in violation of this policy has occurred, the committee will recommend appropriate disciplinary action. The appropriate action will depend on the following factors: a) the severity, frequency and pervasiveness of the conduct; b) prior complaints made by the complainant; c) prior complaints made against the respondent; and d) the quality of the evidence (e.g., first-hand knowledge, credible corroboration).
6. If the investigation is inconclusive or if it is determined that there has been no violation of policy but potentially problematic conduct may have occurred, the **committee** may recommend appropriate preventive action.
7. Within five days after the investigation is concluded, the member of the committee will meet with the complainant and the respondent separately, notify them of the findings of the investigation, and inform them of the action being recommended.
8. The complainant and the respondent may submit statements to the member of the committee challenging the factual basis of the findings. Any such statement must be submitted no later than five working days after the meeting with the Anti-harassment committee in which the findings of the investigation are discussed.
9. Within 10 days from the date the members of committee meet with the complainant and respondent, the University will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with the committee and other management staff as may be appropriate, and decide what action, if any, will be taken. The committee will report the decision to the complainant, the respondent and the appropriate management assigned to the department(s) in which the complainant and the respondent work. The University’s decision will be in writing and will include findings of fact and a statement for or against disciplinary action. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.