



THE HIGHER EDUCATION COMMISSION

POLICY ON PROTECTION AGAINST HARASSMENT IN
HIGHER EDUCATION INSTITUTIONS

[Revised 2025]



Greenwich University

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N.B: This policy may be amended at any time without prior notice. All revisions shall supersede any previous versions and shall take effect immediately upon approval.

**QUALITY ENHANCEMENT CELL GREENWICH
UNIVERSITY**

Glossary of Terms and Abbreviations

HEIs	Higher Education Institutions
HEC	Higher Education Commission
VC	Vice Chancellor/Rector/Director
CBA	means Collective Bargaining Agent as provided in the Industrial Relations Act 2008,(IV of 2008) or any other law for the time being in force.
Competent Authority	means the authority as may be designated by the management for the purposes of this Act i.e. Vice Chancellor/Rector/Head of Institution and Syndicate/Board of Governors/Chancellor in case of complaint is against the Vice Chancellor/Rector/Head of Institution.
Appellate Body	As mentioned in the 6 (1-2) of the 2010 Harassment ACT (as amended in 2022 the “2010 Harassment ACT).

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1. PRINCIPLES AND PURPOSES OF THE POLICY

1.1. Higher Education Institutions (“HEIs”) are highly consequential institutions in society that are dedicated to the pursuit and dissemination of knowledge. Members of the HEI community have several important rights and privileges, central among which is the right to pursue inquiry and search for knowledge without hinderance from unlawful or otherwise unacceptable constraints. The Higher Education Commission (the “HEC”), which has been mandated by law to prescribe conditions under which HEIs in the country may be opened and operated, takes very seriously the freedom of teachers, researchers, scholars, students and other members of the HEI community to live and work in a safe environment in which their dignity is protected.

1.2. Protection against harassment is important not only because it threatens the freedom and conduciveness of the environment at institutions of higher learning. At a more fundamental level, such conduct is unacceptable because it violates personal dignity and shall not be tolerated at HEIs in Pakistan under any circumstance.

1.3. In accordance with the terms of this policy, harassment shall be prohibited at HEIs in Pakistan and shall constitute a punishable offence under the policy. The HEC affirms the right of every member of the HEI community to live, study and work in an environment that is free from harassment. The goal of this policy is to prevent harassment from taking place, and where necessary to act upon complaints of harassment promptly, fairly, judiciously and with due regard to the confidentiality of all parties concerned.

1.4. All administrators, deans, managers, faculty, department chairs, directors of schools or programs and others in supervisory or leadership positions have an obligation to be familiar with and to uphold this policy and its procedures along with informing members of their staff about its existence. HEIs are encouraged to formulate internal policies that further strengthen or expand the protections available under the HEC’s policy on harassment.

1.5. This policy has been made pursuant to the powers granted to the HEC under the Higher Education Commission Ordinance, 2002, and is binding on all higher education institutions in the country, whether operating in the public or private sectors. Violations or failure to comply with the HEC’s policies may lead to regulatory action being taken against non-compliant HEIs.

1.6. This policy is consistent with and has been made in light of the provisions of the Protection Against Harassment of Women at the Workplace Act 2010 (as amended in 2022 the “2010 Harassment Act”). It extends the protection against harassment to all members of the HEI community and provides the option to aggrieved persons to seek resources within the HEI or to seek redressal through the provisions of the 2010 Harassment Act.

2. PROHIBITED CONDUCT

2.1. “Harassment” means any unwelcome advance, request for favors or other verbal or written communication or physical conduct of a nature, or demeaning attitudes, where:

- a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual participation in any activity at the HEI;

- b) Submission to or rejection of such conduct by an individual is used as a basis for academic or employment decision affecting that individual; or
- c) Such conduct has the purpose or effect of interfering with an individual's academic or work performance, or of creating an intimidating, hostile, or offensive educational or working environment.

2.2. 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 activity, persistent and unwelcome flirting (see Annex 1 for examples of various manifestations).

2.3. The following behaviors are specifically prohibited under this policy. The following are meant to provide specificity to the definition provided in clauses 2.1. However, it is not an exhaustive list, and other behaviors that fall within the scope of the definition above shall also be prohibited.

- a) ***Epecially Egregious Non-Consensual Acts***: Acts that would be included in the category of attempted rape. While such situations will be covered under the laws of the country, and law enforcement institutions and the courts will investigate and adjudicate accordingly, the HEI administration has a special obligation to take preventative measures, offer immediate assistance and take interim measures when required.
- b) ***Non-Consensual Contact***: Includes contact with another person without consent.
- c) ***Exploitation***: Taking of actions that violate the sexual privacy of others or taking sexual advantage of another without their consent. For example, taking pictures, videotaping, viewing or distributing explicit images or sexual information of another person without their consent.
- d) ***Other Pervasive or Severe Behaviors***: It is not necessary that there be actual contact for a behavior to be categorized as harassment. Other unwelcome behaviors are also prohibited if (i) they are based on an individual's sex or gender (ii) are persistent or highly serious and (iii) create an atmosphere which is intimidating or hostile. These include but are not limited to lewd remarks or gestures, highly offensive jokes of a sexual nature, commenting inappropriately about another's body, and stalking.
- e) ***Gender Discrimination***: Adverse treatment of individuals based on their gender rather than on merit. This would include instances such as the singling out (for such adverse treatment as lower salary or grades, or more severe punishment) of person(s) on the basis of sex or gender.

2.4. All the actions categorized as harassment when done physically or verbally would also be considered as harassment when done electronically such as through the internet, e-mails, social media, texting, telephone, voicemail etc.

2.5. All actions of harassment or discrimination may be taken by a person of any gender against a person of the same or another gender and would need to be considered by the HEI if the act qualifies as prohibited conduct under the policy.

2.6. Harassment is especially offensive when perpetrated by people in authority, and when submission is made a condition toward any HEI activity or benefit (for example, when submission is made the basis of the evaluation of an individual).

2.7. Harassment will be considered especially egregious when the accused knew or reasonably should have known that the victim was in an impaired or incapacitated state. However, impairment of the accused, such as a result of the use of any illegal substances, shall not diminish their responsibility for harassment under this policy.

3. JURISDICTION

3.1. This policy applies to actions by students, faculty, staff, other members of the HEI community (such as interns, residents etc.), or third parties (such as service providers, visitors etc.), who may be male, female or transgender persons, when the misconduct occurs:

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

4. DESIGNATED RESOURCES

4.1. The HEI provide immediate assistance to those who have experienced harassment. Contact information of such individuals shall be easily available, on students notice boards, hostels and including on the HEIs website.

4.2. The HEI shall also constitute an Inquiry Committee to investigate and adjudicate any allegations of prohibited conduct (the "Inquiry Committee") in accordance with the provisions of Section 7 below. Those who have experienced harassment may also contact members of the Inquiry Committee for support and advice.

5. COMPLAINTS AND REPORTING

5.1. A complaint may be lodged by any person who has experienced harassment as defined in Section 2 (Prohibited Conduct) read with Section 3 (Jurisdiction) of this policy, with any member of the Harassment Inquiry Committee.

5.2. In cases in which the conduct in question falls within the scope of the 2010 Harassment ACT as amended in 2022 the "2010 Harassment ACT, the affected person shall also have an option to submit a complaint to the Ombudsperson in accordance with the provisions of the 2010 Harassment ACT (as amended in 2022 the "2010 Harassment ACT).

5.3. In the event that a complainant is reluctant to contact any member 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 the procedure and policy from them to affect a solution, if a solution is necessary.

5.4. A complainant does not necessarily have to make a complaint of harassment through the informal channel. They can launch a formal complaint at any time. The complainant may make formal complaints through her incharge, supervisor, CBA nominee or worker's representative or directly to any member of the Inquiry Committee. The Committee member approached is obligated to initiate the process of investigation. The supervisor shall facilitate the process and is obligated not to cover up or obstruct the inquiry (as mentioned Section 2-vii & viii of 2010 Harassment ACT (as amended in 2022 the "2010 Harassment ACT)).

5.5. All members of the HEI community are encouraged to report any instances of harassment that they may have observed to Inquiry Committee. For the purposes of safeguarding the campus community, HEIs have an obligation to investigate material violations of this policy even in the event that a formal complaint has not been filed.

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

5.7. For minor violations, complainants may opt to make an informal complaint to the Inquiry Committee. The primary objective of 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 offending behavior before it reaches a higher degree of seriousness. If the incident reported through this mechanism constitutes prohibited conduct under Section 2 of this policy, the Inquiry Committee shall deal with the complaint accordingly.

6. INTERIM MEASURES AND SPECIAL ARRANGEMENTS

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

- a) adjustment in class or examination schedules, including for the purposes of attending hearings;
- b) access to counselling 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 in class schedule, including withdrawal from a 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 HEI 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.

7. INQUIRY COMMITTEE

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

7.2. The Inquiry Committee shall be constituted in the following manner:

- 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 the HEI.
- b) All members of the committee shall be employees of HEI and will be appointed by the Vice Chancellor (the "VC") after the VC has taken nominations from senior members of the HEI administration. The VC can co-opt one or more members from outside the HEI if it is otherwise not possible to designate three members as described above.
- c) Members of the Committee shall be individuals who are known for being principled, credible, fair, gender-sensitive and have a strong character (someone who will not change their decision due to pressure from friends, colleagues or seniors). They shall have not a conflict of interest in particular cases, and shall be impartial and unbiased.
- d) Members of the Committee shall be appointed for a term of two years (shorter terms may be required occasionally to fill vacancies). No member shall serve for more than two consecutive terms. Former members will be eligible for reappointment after a lapse of two years.
- e) One of the members of the committee shall be appointed as the Chair 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) If the facts of the complaints are established against that member of the committee, he will immediately be replaced with other members and he will not be part in any inquiry.

7.3. The HEI shall endeavor to provide training to members of the Inquiry Committee in investigation and adjudication of conduct prohibited under this policy.

8. INVESTIGATION AND ADJUDICATION

8.1. All complaints alleging Harassment received by the Inquiry Committee will be processed within 24 hours.

8.2. As soon as is reasonably practicable after receiving a complaint, the Inquiry Committee shall determine whether the alleged conduct in the complaint meets the criteria set forth in Sections 2 (Prohibited Conduct) and Section 3 (Jurisdiction) 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.

8.3. 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 majority vote to initiate proceedings after notifying the VC.

8.4. After initiating the investigation, and not later than three days after receiving 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 in 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.

8.5. The following rules shall be applicable 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)/accused, and he witnesses if any (as required) and examine any other documents and/or evidence as presented by the relevant parties or collected in the process of conducting the inquiry;
- c) The Inquiry Committee shall have discretion to limit testimony and questioning of witnesses to those matters it considers relevant to the disposition of the case. The Inquiry Committee shall be bound to reach facts while exercising discretion.
- d) The Chair of the Inquiry Committee shall have the power to compel a witness to attend, and the complainant(s) and/or accused may request the Chair's aid in this regard;
- e) The complainant and the accused may at any stage of any of the proceedings be represented and/or accompanied by another person of her/his 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, and high confidentiality of the records and other such material shall be upheld at all times;
- h) The accused 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, guided by the principles of fairness and natural justice, establish any appropriate procedure.

8.6. Employees of the HEI community have an obligation to cooperate in an investigation, and refusal to cooperate may result in disciplinary action. There may be

circumstances in which the complainants may wish to limit their participation in the proceedings. The complainant shall not be subjected to disciplinary proceedings, but the HEI may be obligated to proceed with the investigation.

8.7. 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 criteria 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.

8.8. The Inquiry Committee shall complete the inquiry and recommend its final decision within a period of 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.

9. CONFIDENTIALITY

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

9.2. The members of the Inquiry Committee and their support staff shall be subject to administrative disciplinary action for inappropriate breaches of confidentiality on their part.

9.3. All notes and records arising in connection with an investigation shall be maintained in a confidential file at the HEI.

10. PENALTIES

10.1. In cases in which the accused is a student, the following sanctions may be imposed:

- a) In case of minor violations, the student may be issued a warning or reprimand by the concerned HEI. 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; that mean any service provided at campus relocation from campus housing; exclusion of the accused from a designated portion(s) of HEI buildings or grounds, or from one or more HEI designated activities, (provided such penalty is commensurate to the offence and where the penalty does not prevent the accused from pursuing her/his studies); attending educational programs on gender sensitivity; 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).

10.2. In cases in which the accused is a member of the faculty, researcher or employee/staff of the HEI, the following sanctions may be imposed (individually or in combination), keeping in view the terms of the applicable employment policies:

- a) oral or written reprimand by the concerned HEI
- b) counselling or training by the concerned HEI.
- c) inclusion of the decision in a specified personnel file(s) of the accused.
- d) exclusion of the accused from a designated portion(s) of HEI buildings or grounds, or from one or more designated HEI activities, where such penalty is commensurate to the offence and where the penalty does not prevent the accused from carrying out her/his professional duties.
- e) the imposition of a fine;
- f) recommendation for suspension of the accused should be based as per HEI statute.
- g) recommendation that dismissal proceedings be commenced; or
- h) other sanctions, as deemed appropriate, in accordance with the terms of the employment policies.

11. RIGHT OF APPEAL

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

11.2. In cases in which the conduct falls within the scope of the 2010 Harassment ACT (as amended in 2022 the “2010 Harassment ACT”), the aggrieved party shall have an option to file an appeal to the Ombudsman in accordance with the provisions of the 2010 Harassment ACT (as amended in 2022 the “2010 Harassment ACT”) within a period of 30 days from the date of notification of the decision.

11.3. Any party aggrieved by decision of the Competent Authority on whom minor or major penalty is imposed may within thirty days of written communication of decision prefer an appeal to an Ombudsman established under section 7. According to ACT Section 7(1) Ombudsman: - (1) The respective Governments shall appoint an ombudsman at the Federal and provincial levels. In case of accused student, the appeal can be sent to the Syndicate/Board of Governors of HEI against the decision of Competent Authority of HEI.

11.4. 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 reached a decision without consideration of material information;
- c) the imposed penalty is unfair because it is disproportionate or materially different from that imposed for similar misconduct; or
- d) the adjudication process followed by the Inquiry Committee was procedurally unfair.

11.5. In order to reach its decision, the Appellate Body may communicate with the parties, the members of the Inquiry Committee, or other members of the HEI community as it deems fit.

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

12. MALA FIDE ALLEGATION

12.1. False allegations of harassment made out of malice or intent to hurt the reputation of the persons against whom the complaint is filed are to be dealt with as serious offences. Making mala fide allegation of harassment knowing it to be false, whether in a formal or informal context, is a serious offence under this policy.

12.2. In the event that 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 Harassment ACT (as amended in 2022 the “2010 Harassment 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.

13. PROTECTION AGAINST REPRISAL

13.1. HEIs shall not allow reprisals or threats of reprisal against any member of the HEI community who makes use of this policy (formally or informally). HEIs shall also prohibits such threats or actions against anyone who participates (e.g. testifies, assists, etc.) in the inquiry committee’s or the Appellate Body’s proceedings held under its jurisdiction.

13.2. Retaliation or any other action against a complainant of harassment is to be taken seriously under the provisions of this policy. All allegations of retaliation would be investigated formally by the inquiry committee under the purview of this policy, and if substantiated, will result in appropriate disciplinary action the penalties noted in Section 10 and this may be taken in subsumption within the original complaint.

14. SPECIAL CONSIDERATIONS REGARDING RELATIONSHIPS BETWEEN INDIVIDUALS

14.1. In contrast with harassment, personal relationships amongst consenting adults of the HEI community that do not breach the social and cultural norms of the society are, in general, a private matter.

14.2. 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.

15. EDUCATION FOR PREVENTION

15.1. To ensure the prevention of harassment on campus, HEIs should develop programs to educate its staff, faculty and students as well as provide written material for reference. Education is essential to sensitizing the university faculty, staff and students in order to eliminate harassment on campus. This shall be done in multiple ways, including those listed below.

15.2. The HEC's Harassment Policy, any of the university's internal policies as well as information regarding the 2010 Harassment ACT (as amended in 2022 the "2010 Harassment ACT) shall be:

- a) be made available on the HEI website (preferably at a visible place such as the homepage or a separate tab).
- b) be a part of the information package that all new hires receive;
- c) be a part of orientation session of new students and included in any written material given to them;
- d) be included in the HEI's Prospectus (a summarized version); and
- e) displayed in prominent locations on campus

15.3. The names of the members of the Inquiry Committee shall be made visible/accessible to the HEI community through its website, posted on notice boards, etc.

15.4. The HEI shall ensure that its relevant members (e.g members of the Inquiry Committee, HR personnel, etc.) attend training to educate themselves on harassment and the relevant laws and policies. Once trained, designated HR personnel shall be made responsible for educating all personnel, staff, faculty, students that join the HEI. This will be an ongoing activity.

15.5. All departments at the HEI must disseminate and display information about training session(s) on harassment (these should be held bi-annually or as required in each HEI these programs, what constitutes harassment, how to respond to it and what to do when someone asks for advice about harassment.