



Sexual Harassment Policy

The Policy Statement

Bethlehem Bible College, hereafter referred to as BethBC, is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. BethBC 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 another will be subject to disciplinary action, up to and including dismissal from employment.

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.

Wherein sexual harassment issues in the workplace and within our society as a whole are major issues. BethBC is committed to core values that include respect and dignity for all people in all interactions.

BethBC is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment. Hence, BethBC expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, discrimination, and harassment.

In order to keep this commitment, BethBC maintains a strict policy of prohibiting unlawful harassment of any kind, including sexual harassment.

All employees must, through their words and actions, always embody the highest standards of conduct and integrity, and are required to treat others with dignity, courtesy and respect, at all times.

Scope / Applicability

This policy applies to:

- Board members.

- Senior leadership team (SLT).
- All staff and faculty including directors, heads of departments, supervisors; full-time, part-time or casual, temporary or permanent employees, job candidates, students, contractors, suppliers, clients, visitors, and volunteers.
- On-site, off-site or after-hours work, work-related social functions and activities, conferences, events – wherever and whenever staff may be as a result of their duties.

Employees rights and responsibilities

All employees are entitled to:

- Work free from discrimination, bullying and sexual harassment.
- The right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimized.

Employees are responsible for:

- Abiding to this policy.
- Offering support to people who experience sexual harassment, including providing information about how to make a complaint.
- Treating others fairly and with respect at all times.
- Not condoning harassment and workplace bullying.
- Reporting instances of harassment and workplace bullying.
- Not being engaged in gossip and to respect the confidentiality of complaint resolution procedures.

Additional responsibilities of SLT members

- Model appropriate standards of behavior at all times.
- Take steps to educate and make employees aware of their obligations under this policy.
- Intervene quickly and appropriately when they become aware of inappropriate behavior.

- Act fairly to resolve issues and enforce workplace behavioral standards, making sure relevant parties are heard.
- Help employees resolve complaints informally where appropriate.
- Make sure that employees who raise an issue or make a complaint are not victimized.
- Ensure that they do not reward or engage in harassing or bullying behavior themselves.
- Ensure these subjects to allegations of sexual harassment are treated fairly and with dignity while the complaint is investigated.

Definition of sexual harassment

Sexual harassment is unsolicited conduct of a sexual nature which makes a person feel offended, humiliated, intimidated and in fear of physical harm. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions. Harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, inappropriate touching, or exposing their private areas to another.
- Physical violence, including sexual assault. (Taking into consideration any cultural differences).

Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes.
- Sexual advances.
- Repeated and unwanted social invitations for dates or physical intimacy.

- Insults based on the sex of the worker.
- Condescending or paternalistic remarks.
- The use of job-related threats or rewards to solicit sexual favors.

Non-verbal conduct

- Display of sexually explicit or suggestive material.
- Sending sexually explicit messages (by phone or by email).
- Sexually-suggestive gestures.
- Whistling.
- Leering.
- Exposing any part of the body, particularly private areas in a sexual nature.

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser.

BethBC recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed. This recognizes that men and women can be victim of sexual harassment in the workplace.

BethBC recognizes that sexual harassment is often a manifestation of power relationships and can occur within unequal relationships in the workplace, for example between manager, director, or supervisor and employee.

Anyone, including employees of BethBC, students, volunteers, clients, casual workers, contractors or visitors who are found after investigation to be guilty of sexual harassment of another, will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within BethBC's premises or outside, including at social events, trips, training sessions or conferences.

Complaints procedures

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. BethBC recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person is the HR manager.

When a designated person receives a complaint of sexual harassment, he/she will:

- Immediately record the dates, times and facts of the incident(s), as given by the complainant.
- Ascertain the views of the complainant as to what outcome he/she wants.
- Ensure that the complainant understands the company's procedures for dealing with the complaint.
- Discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the complainant from pursuing a formal complaint if he/she is not satisfied with the outcome. However, it may not be possible to resolve informally if the matter is of a serious/ criminal nature.
- Keep a confidential record of all discussions.
- Respect the choice of the complainant.
- Ensure that the complainant knows that he/she can lodge the complaint outside of BethBC through the relevant country/legal framework.

Informal complaints mechanism (If available and appropriate and the method of resolution is agreed by BethBC)

If the complainant wishes to deal with the matter informally, the designated person will:

- Give an opportunity to the alleged harasser to respond to the complaint.
- Ensure that the person subject to concern (PSC) alleged understands the complaints mechanism.
- Facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the College to resolve the matter.
- Ensure that a confidential record is kept of what happens.
- Follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped.
- Ensure that the above is done speedily and within maximum ten days of the complaint being made.

Formal complaints mechanism

If the complainant wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the complainant or if it is not appropriate, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially receives and deals with this matter is called the Safeguarding Officer (SO), whom in this context is the HR Manager at BethBC. The HR manager will then conduct a formal investigation, who may deal with the matter him/herself, refer the matter to an internal or external investigator or refer it to a committee of three others in accordance with this policy.

If a committee is created to carry out the investigation, the committee should be set up bearing in mind gender-balance and should be trained on understanding and deciding what constitutes sexual harassment, how to investigate it, etc.

The person carrying out the investigation will:

- Interview the complainant, the witnesses, other evidence and the person subject of concern.
- Interview other relevant third parties separately.
- Determine whether or not the incident(s) of sexual harassment took place and/or if it should be referred to police or a legal body according to the law.
- Produce a report detailing the investigations, findings and any recommendations, based on a finding on the balance of probabilities.
- If the harassment is deemed to have taken place, decide what the appropriate remedy for the victim is, in consultation with the complainant (i.e. an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal).
- Follow up to ensure that the recommendations are implemented, that the behavior has stopped and that the victim is satisfied with the outcome.
- Keep a record of all actions taken.
- Ensure that all records concerning the matter are kept confidential.
- Ensure that the process is done as quickly as possible and in any event within ten days of the complaint being made, unless prevailing or unexpected circumstances necessitate a delay.

It is also vital that the wishes and needs of the victim are incorporated into the outcome of the complaint's mechanism. For example, if it is found that a victim was harassed by a colleague and that they work together on a daily basis, the views of the victim should be ascertained before making a decision on reorganizing the office. For example, the victim may not want to be moved

to a different department and as the victim, he/she should be entitled to decide this and not be re-victimized by being forced to move within the College.

Sanctions and disciplinary measures

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:

- Verbal or written warning.
- Adverse performance evaluation.
- Transfer.
- Demotion.
- Suspension.
- Dismissal.

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

Retaliation Prohibited

In all cases, BethBC prohibits any form of retaliation against anyone who reports about a violation of this policy or who participates in a related investigation. Such retaliatory actions are also a serious violation and are subject to disciplinary action up to and including termination. Acts of retaliation should immediately be reported to the SLT members and to the HR manager, and will be promptly investigated and addressed. However, willfully false or malicious complaints of violation of this policy shall also be subject to disciplinary action.

Implementation of this policy

BethBC will ensure that this policy is widely disseminated to all relevant persons. It will be attached to the employee's contract. All new employees must be trained on the content of this policy.

It is the responsibility of the HR Manager to ensure that all employees are aware of the policy.

Monitoring and Evaluation

BethBC 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.

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 upon necessity. As a result of this report, BethBC will evaluate the effectiveness of this policy and make any changes needed.

Commitment to training and review

All employees of BethBC are required to participate in the training sessions provided to tackle this policy. Furthermore, BethBC will continually renew its commitment to the safe and just workplace promoted by this policy. This includes reviewing and improving the policy's effectiveness as BethBC grows to ensure that it continues to promote and effectively protect BethBC's core values and its commitment to fairness and integrity in BethBC's workplace and all operations.

Pledge and Commitment

I, the undersigned -----, having read and reviewed the document of "Sexual Harassment Policy", I confess in front of the undersigned witness who is present, that I am aware of all the components of this policy which I have signed.

I do agree and pledge to commit to all items contained therein and respect them while I am involved in all the activities, whether inside or outside BethBC.

Name: _____ Signature: _____

Witness: _____ Signature: _____

Date: _____

