

SEXUAL HARASSMENT POLICY

CHAPTER ONE: Policy Context

1.1 Introduction

Ghana's Labour Act (2003) defines sexual harassment as "any unwelcome sexual advance or request made by an employer, superior or co-worker to a worker (whether they are man or woman)". The focus of this Act is to prevent and protect people from experiencing sexual harassment. However, available literature indicates that sexual harassment is still very prevalent, both at the workplace and in educational settings. For instance, Andoh (2011) reported that 74% of female employees and 42% of male employees in Ghana have experienced various forms of sexual harassment within their working environment. These include: unwanted proposals; unwanted sexual teasing or remarks; pressure for dates; unwanted love letters, telephone calls; unwanted sexual looks or gestures; inappropriate pornographic materials; unwanted touching of body parts; demand for sex in exchange for employment opportunities or benefits; and attempted or actual sexual assault or rape among others.

In another scenario, Akaab (2011) in her paper titled "Sexual Harassment for Grades in Tertiary Institutions - A Myth or Reality" reported that about 17.5% of interviewed respondents in tertiary institutions in Ghana had been victims of sexual harassment.

Similarly, Britwum and Anokye (2006) in their book titled "Confronting Sexual Harassment in Ghanaian Universities" identified sexual harassment as a serious problem on university campuses and observed that there were inadequate formal policies on sexual harassment in these public universities.

Victims of sexual harassment can suffer significant psychological effects, including anxiety, depression, headaches, sleep disorders, and lowered self-esteem and the like. In tertiary education settings such as St Joseph's College of Education, student victims of sexual harassment may experience physical and psychological distress and may feel pressured to skip lectures, drop a programme or change their programme of study. Members of staff who experience sexual harassment may experience decreased morale, decreased job satisfaction and irreparable damage to interpersonal relationships at work. In sum, sexual harassment causes tense and unproductive learning and work environments.

1.2 Purpose

Sexual harassment can pose serious impediment in the College's efforts to realising her vision of becoming a College of excellence. Hence the need for a Sexual Harassment policy to guide sexual behaviours of staff, students, and the entire members of the College community as well as the schools and communities where our students undertake their teaching practice so as to create a safe and congenial environment for productive work and learning.

This policy seeks to provide clear understanding of what constitutes sexual harassment, state guidelines for informal and formal reporting systems for sexual harassment, provide guidelines for disciplinary procedures and spell out dissemination and awareness strategies to prevent future occurrence of sexual harassment in the College and teaching practice schools.

CHAPTER TWO: Policy Framework

2.1 Goal

The goal of this Sexual Harassment Policy is to provide clear definitions, processes and protocols surrounding sexual harassment in order to reduce and prevent its occurrence in the College and in the schools and communities where our students go for practicum.

2.2. Scope

This Sexual Harassment Policy is aligned with and builds upon the gender responsive strategies outlined in the College's Gender and Inclusion Policy. It specifically aims to provide clear definitions, reporting processes, disciplinary protocols and dissemination guidelines for the College. This policy shall apply to all members of the college community [staff and their dependants/relatives, students], including visitors, and all persons acting in various capacities with, or on behalf of the College.

The policy shall apply equally to all teaching practice schools and their communities. Any person who is not a member of the college community shall be handed to the security agencies when an issue of sexual harassment is reported.

This policy shall not apply to sexual harassment of members of the college community by the public, but members of the college community are not expected to tolerate offensive or threatening sexual behaviour in the course of work outside the school community (should it occur the victim should contact the College authorities).

2.3 Policy principles

In alignment with the College's Gender and Inclusion Policy, the following principles guide this policy:

- **Mutual Co-existence:** Men and women should co-exist peacefully, respectfully and improve gender relations.
- **Non-Discrimination:** As enshrined in the 1992 Constitution of Ghana, neither men nor women should be discriminated against in terms of access to the resources that the nation offers to its citizens.
- **Non-Violence:** Ghana's Labour Act (2003) and Domestic Violence Act (2007) prohibits sexual harassment, intimidation by inducing fear in another person, behaviour or conduct that harms another person, endangers the safety, health or well-being of another person, undermines another person's privacy, integrity or security, or detracts from another person's dignity and worth as a human being.
- **Fairness and confidentiality:** All activities and strategies regarding sexual harassment cases should be dealt with fairly, promptly and in a confidential manner.
- **Political Will:** Government, College Council, Management and all stakeholders of the College should have the political will to eliminate all forms of sexual harassment.

2.4 Policy statement

Each member/employee of the college community has the right to be treated with respect and dignified sexual life and has the responsibility to ensure that every member of the college community is free from sexual harassment. The policy aims to re-establish positive relationships by the swift and effective resolution of complaints relating to sexual harassment.

The Sexual Harassment policy is committed to securing a working and learning environment that is free from sexual exploitation and intimidations. It abhors:

- a) Verbal, physical, written and pictorial communication relating to gender or sex which has the purpose or effect of unreasonable interference on an individual's performance, or which creates a hostile, offensive, or intimidating atmosphere for the recipient.
- b) Unwelcome and irrelevant comments, references, gestures or other forms of personal attention which are inappropriate to the academic, employment, or residential setting
- c) A request for sexual favours when submission to, or rejection of such a request might reasonably be viewed as a basis for evaluative decisions affecting an individual's future.
- d) Sexual imposition that is non-consensual.
- e) Abuses of power relations such that individuals receive unfair treatment based on gender or sexuality.
- f) Notwithstanding, abuses coming from the subordinate to the super ordinate also constitute sexual harassment.
- g) Threat or coercion of sexual relations; sexual contact which is not freely agreed by both parties, including rape.

It is important to note that any form of sexual harassment occurs within a situation of unequal power relations between and among parties, and therefore in this policy document issues of sexual harassment are considered within the context of the power inequities within which any form of harassment is alleged to have occurred.

2.5 Policy Basis/Supporting Legislations

The Government of Ghana has passed national legislation and has ratified various international conventions that seek to promote gender equality and reduce gender based violence. Signing these conventions and declarations is a clear indication that the Government is committed to pursuing gender equality in development. The following documents have been identified in the College's Gender and Inclusion Policy and as such, also serve as the basis for this Sexual Harassment Policy.

- a) Sustainable Development Goals (2015-2030)
- b) African Union Gender Policy Commitments
- c) The 1992 Constitution of Ghana
- d) The 2003 National Labour Act
- e) The 2007 Domestic Violence Act
- f) The 2015 National Gender Policy
- g) The 2018 Gender in Education Policy for Colleges of Education
- h) Education Strategic Plan, 2018-2030 Policy Objectives

CHAPTER THREE: Policy Objectives and Strategies

3.0 Introduction

This Sexual Harassment Policy aims to provide a robust minimum standard that all members of the College and teaching practice communities must meet. It provides specific definitions, processes and protocols that the College will use to reduce incidences of sexual harassment and thus improve the gender-responsiveness of the College and teaching practice environments. Thus this section outlines five policy objectives that St. Joseph's Colleges of Education seeks to implement and oversee, through institutional arrangements discussed in the next section. The policy objectives are developed out of the policy context, the situational analysis and achievements made so far in the College. The objectives aim to provide:

- A clear understanding of what constitutes sexual harassment
- Guidelines for informal reporting systems for sexual harassment
- Guidelines for formal reporting systems for sexual harassment
- Guidelines for disciplinary procedures
- Dissemination and awareness strategies to prevent sexual harassment in the future

3.1. Policy Objective 1: To Provide a Clear Understanding of What Constitutes Sexual Harassment.

3.1.1 Definition of Concepts

3.1.1.1 Sexual Harassment

Unwelcome sexual advances, request for sexual favours and other verbal or physical conduct of a sexual nature, whether on a one-time basis or series of incidents that might cause offense, humiliation, awkwardness or embarrassment, or that might reasonably be conceived as placing a condition of a sexual nature on employment, opportunity for promotion, grades, etc. (AWLA, 2003, cited in Akropong-Akuapem Presbyterian College of Education Handbook, 2015)

In the context of this policy, Sexual harassment refers to any behaviour that involves **unwanted** sexual advances, requests and other verbal or physical conduct of a sexual nature. The term **Unwanted** is a critical word in that a victim may consent to certain conduct not because he/she wants to, but because he/she feels pressured to do so. In the College setting, harassment can be from a staff to a colleague; staff to a student, staff dependent to a student, a student to a staff dependent, a student to a staff, student to a fellow student, a manager to a staff, a manager to a student. In the case of the teaching practice communities, harassment can be from a teaching practice mentor or a member of the community to a mentee, mentee to a teacher/mentor/lead mentor/pupil/community member.

The physical and psychological distress that staff and students experiencing sexual harassment go through can be irreparable and damaging to the interpersonal relationships. Clearly, unwanted sexual behaviour can have serious effects on the teaching and learning process and work outcomes.

3.1.1.2 Sexual Consent:

It is the act of agreeing to engage in specific sexual conduct. In order for consent to be valid, both parties must have unimpaired judgment and a shared understanding of the nature of act to which they are consenting, including safer sex practices. Silence does not mean consent. If at any time consent is withdrawn, the conduct must stop. Consent here excludes sexual relations between individuals of unequal power relations, which provide avenues for the receipt of benefits.

3.1.1.3 Consensual Intimate Relationship:

This refers to intimate sexual relations between senior members and students or between senior members and staff or any category of persons in the College where one party is in supervisory position over the other. The College does not favour these relations since they raise concerns about sexual harassment and conflict of interest except where they are legally married.

3.1.2 Types of Sexual Harassment

This policy outlines three main forms of sexual harassment. These are: Hostile Environment, Quid Pro Quo and Retaliation.

3.1.2.1 Hostile Environment Harassment

Hostile environment sexual harassment is when **unwanted conduct makes a student's or a staff member's environment unpleasant or uncomfortable**. In these instances, the perpetrator can be anyone - a superior, a fellow student, a fellow colleague, a TP mentor, a mentee, a pupil, a community member.

Examples of hostile environments include:

- Unnecessary and unwanted nicknames such as, 'sweetie', 'baby', 'girlfriend'
- Intrusive sexually explicit questions, asking personal questions about a person's sex life
- Spreading rumours about a person's sexuality, sexual activity or speculations about previous sexual experience
- Remarks of a sexual nature about a person's clothing or body
- Unnecessary and unwanted touching, pinching, massaging, dancing, hugging or brushing up against a person's body
- Sexually suggestive stares, sounds or gestures such as winking, licking lips, whistling, sucking noises or pelvic thrusts
- Sexually explicit jokes, pictures, calendars, cartoons, internet images or pornographic materials
- Unwanted recurrence of telephoning, texting, emailing, comments on social media, following, stalking, gift giving, proposing or asking for a date
- Unwanted propositions of a sexual nature (including those occurring in situations that begin as reciprocal attractions, but later cease to be mutual)
- Spying on someone that is engaged in intimate behaviours, such as undressing, bathing, sexual activity or any other activity that is considered to be private
- Actual or attempted rape or sexual assault

3.1.2.2 Quid Pro Quo Harassment

Quid Pro Quo (meaning "this for that") sexual harassment occurs when someone implies or states to a student, colleague or employee that an impending action or decision depends upon whether they submit to conduct of a sexual nature. For example, if a pupil/student is made to believe that her grade is dependent on whether she goes on a date with her teacher/tutor, the student is being subjected to "quid pro quo" sexual harassment. In addition to this, the same applies if a student offers a sexual favour to a tutor in return for a good grade. In these cases, sexual behaviour is used as the basis for a transaction. Even if consensual, this is not acceptable in an educational setting such as St. Joseph College of Education and teaching practice schools.

Examples of Quid Pro Quo Harassment

- Direct or indirect promises of academic benefits (such as high grades, letters of recommendation, participation in an activity), in return for sexual favours
- Direct or indirect promises of work benefits (such as job offering, promotion, housing, allowances, letters of recommendation, good appraisals) in return for sexual favours

3.1.2.3 Retaliation Harassment

Retaliation harassment occurs when **a victim suffers a negative action after they have rejected a sexual advance, made a report of sexual harassment or assisted someone else with a complaint.** Negative actions can include social exclusion, getting a poor grade or being fired, and are usually instigated by perpetrators in order to punish victims.

Examples of Retaliation Harassment

- Adverse academic actions or decisions (such as evaluations, low grades, social exclusion, poor treatment in class), because a sexual advance has been rejected or reported
- Adverse employment actions or decisions (such as evaluations, failure to hire or promote, transfer, social exclusion, poor treatment in the workplace), because a sexual advance has been rejected or reported.

It can sometimes be difficult to prove retaliation harassment has occurred, but in cases in which a tutor has retaliated by giving a student an unjustified poor grade (because they have rejected a sexual advance, made a report of sexual harassment or assisted someone else with a complaint), proof of retaliation can be determined through the following process:

- ✓ The student can request a marking appeal in which 8-10 ten randomly selected scripts from the same class/assignment are re-marked along with his/hers.
- ✓ A tutor with relevant subject knowledge should be given the marking criteria for the assignment and mark 8-10 anonymised scripts.
- ✓ If the mark for the student claiming retaliation harassment is clearly higher than the original mark (and the marks for the other scripts remain generally the same), this is adequate evidence to claim that the tutor had engaged in retaliation harassment against the student. Such evidence can be used in a formal report hearing (see Section 3.3).

In summary, the examples given for Hostile Environment, Quid Pro Quo and Retaliation harassment are extensive but not exhaustive. Other examples are likely to occur, but **the two main tests for sexual harassment are whether the behaviour is:**

- 1) **of a sexual nature**
- 2) **unwanted or unwelcomed by the victim.**

A person who believes that he/she is being subjected to unwanted behaviour of a sexual nature should first, where possible, make it clear to the harasser that the behaviour is unwelcome, that it is offensive and that it should immediately cease. If a victim is not comfortable approaching the harasser on his/her own, or if he/she has asked the harasser to stop

but the offensive behaviour continues, the following sections outline the informal and formal reporting systems for resolving the problem.

3.2 Policy Objective 2: To provide guidelines for informal reporting systems for sexual harassment

Informal reporting systems are aimed at resolving a complaint of harassment through the confidential advice, support and negotiation of an objective third party. As discussed, the perpetrator can be anyone - a superior, a fellow student, a fellow colleague, a TP mentor/head teacher/teacher, or a community member. An informal report may resolve problems quickly and in many cases, should be used in the first instance of harassment. However, if the harassment persists or has caused serious distress to the victim, more formal reporting may be necessary.

The following steps should be taken to institute an informal reporting system for sexual harassment:

1. **The ‘Safe Space’ focal people** [the Gender Champion, a member of the Gender Committee and the College Counselor] will act as the first point of contact for informal reporting. All students and staff should be made aware that these focal people aim to provide support and a safe space for them to informally report cases of sexual harassment.
2. **Ensure confidentiality and sensitivity** - The Safe Space focal people should ensure confidentiality and listen to the victim’s claim in a non-judgmental way. She/he should ask the victim to tell the whole story in his or her own words. [The focal people should listen with care](#) and take notes in order to document relevant facts such as dates, times, situations, witnesses, and anything else that seems relevant. The focal people should refer the victim for counseling if required.
3. **Ensure objectivity** - If a Safe Space focal person does not feel that she/he would be sufficiently objective to deal with the case (particularly if it involves a close friend, relative or colleague), then the focal person should ask the *other* focal persons to mediate instead. If objectivity is still an issue, the focal people should assess whether there is another member of staff who could step in.
4. **Identify the type/degree of harassment** - After hearing the story, the focal person can use **Section 3.1** to help the victim identify the type of harassment they have experienced (hostile, quid pro quo, retaliation), and confirm whether or not the victim asked the harasser to cease the behaviour. If the victim has been too uncomfortable to ask, or has asked but the unwanted behaviour has continued, the focal person should mediate with the harasser on the victim’s behalf.
5. **Ensure sensitive mediation** - Mediation with the alleged harasser must be done in a sensitive, thoughtful and confidential way. The harasser may not realise he/she has done anything wrong. It is often best to give the benefit of the doubt, or at least speak to the harasser as if he/she is being given the benefit of the doubt, rather than being accused of harassment. What needs to be conveyed to the alleged harasser is that the victim has been made to feel uncomfortable because of his/her behaviour. It may be helpful to use the examples of sexual harassment in the **Section 3.1** to demonstrate how/why the unwelcomed action can be considered sexual harassment.
6. **Listen to both sides of the story** - The focal person should ask the alleged harasser for their side of the story and ensure confidentiality. [The focal person should listen with care](#) and take notes in order to document relevant facts such as dates, times, situations, witnesses, and anything else that seems relevant. If the harasser denies that they have done what was claimed, the focal person should remain neutral.
7. **Facilitate a resolution** - The focal person should state that as long as the victim is not made to feel uncomfortable again, no further discussions will be had. If the alleged harasser agrees with

this, the focal person should communicate this verbally to the victim and document the mediation so that there is a record of it. These records should remain confidential and in a secure place. The focal person should also tell the victim to immediately report if the unwanted behaviour continues or if the harasser retaliates in any way.

8. **Escalation to formal reporting, if needed** - If the victim is not satisfied with the outcome of the informal mediation, if the unacceptable behaviour continues, or if retaliation occurs, then the victim may request that the matter be dealt with under the formal reporting system.

3.3 Policy Objective 3: To provide guidelines for formal reporting systems for sexual harassment

Formal reporting systems are aimed at resolving a complaint of harassment through an investigation and documentation of evidence. As discussed, the perpetrator can be anyone - a superior, a fellow student, a fellow colleague, a TP mentor/head teacher/teacher, or a community member. Formal investigations are thorough, decisions are made by an objective committee, and appropriate disciplinary action is taken. All students and staff should be made aware that formal complaints should be lodged for serious offenses and/or continued unwanted sexual harassment, because the disciplinary action is a robust and fair way to prevent harassers from committing offenses again.

- a. **Preliminary consultation** - To deal with a grievance formally, the victim (staff, student, mentor, lead mentor or pupil) can have a preliminary meeting with a Safe Space focal person to discuss the formal complaint process and what evidence is needed (see point 2). The focal person should ensure confidentiality, be sympathetic, understanding and refer the victim for counseling, if required. The focal person should also make sure the victim is aware that false accusations are sanctionable.
- b. **Notification of complaint** - The victim should submit a formal written notice of the grievance to the Safe Space focal people. The grievance should include supporting evidence, which includes: 1) dates/times/locations of harassment; 2) what type(s) of harassment was/were experienced (hostile, quid pro quo, retaliation, or other) – descriptions should be as detailed as possible; 3) witnesses (if there was no witness who observed the harassment, a witness can be used to at least verify the victim's dates/times/locations); 4) material evidence, if available (like emails, text messages, letters, recordings, etc.); 5) documents from any informal reporting/mediation that may have been attempted.
- c. **Convening the Grievance Committee** - Formal hearings should be dealt with by a Grievance Committee, which includes the Safe Space focal people (made up of both female and male) and the Principal (who should be the chairperson). If any of these individuals feels they would not be sufficiently objective to deal with the case (particularly if it involves a close friend), they can be replaced by a neutral member of staff or a neutral representative from NCTE, NTC or PRINCOF, if one is available. If the Principal is involved in the complaint, a member of the Governing Council should take his/her place.
- d. **Acknowledging receipt** - The Grievance Committee should acknowledge the victim's complaint within one week of receipt. At the time of acknowledging the complaint, a copy of the complaint and supporting evidence should be forwarded to the alleged harasser involved in the grievance. The alleged harasser should be given one week to submit to the Grievance Committee a written response to the complaint, along with any supporting evidence and/or witnesses (as discussed in point 2). A formal hearing will then be arranged, ideally not later than one week following receipt of this response. All parties (including named witnesses) will be required to attend the hearing.

Victims have the right to be accompanied by a colleague or friend throughout the formal grievance meeting.

- e. **Hearing format** - The formal hearing should not be made public and should provide confidentiality to all those involved. During the meeting the Grievance Committee should ask the victim to tell the story in his/her own words. The alleged harasser or witnesses should not be present in the room during this time. The Committee should ask open-ended questions and seek facts that support or disprove allegations. The Committee should use the same approach when individually interviewing witnesses for the victim, the alleged harasser, and witnesses for the harasser. The Committee members should each take individual notes.
- f. **Decision** - At the end of the hearing, the Grievance Committee should go over all evidence/testimony to come to a decision and discuss appropriate disciplinary action. Suggested disciplinary action for different types of harassment, as well as false accusations, are detailed in **Section 3.3**. Once a decision has been made, documentation of the proceedings and result should be given to the victim, the harasser and the College to keep in its records.
- g. **Grievance Appeal Procedure** - Individuals have the right of appeal to any decision reached. Grounds for appeal are if new evidence or a new witness can be brought forward to challenge the Committee’s original decision. An appeal should be lodged in writing to the Principal not later than one week from the date of notification of the outcome of the original hearing. The notice should include the new evidence/witness and reasons why they were not included in the original case. If the Principal is satisfied with the rationale for why the new evidence/witness was not originally included, a copy of the notice for appeal will be submitted to the other parties involved. The other party has one week to respond to this new evidence/witness and the appeal hearing should be arranged within one week of receipt of this response. The appeal will be heard by the same Grievance Committee who attended to the original hearing.
- h. **Appeal hearing format** - The appeal hearing should be conducted in a similar manner to that of the original hearing, but will only consider the new evidence/witness and rationale for why they were not included in the original case. All other parties will be given the opportunity to respond.
- i. **Decision of the appeal hearing** - At the end of the appeal hearing, the Grievance Committee should provide an immediate decision and any appropriate action required. Once a decision has been made, documentation of the appeal proceedings and result should be given to the victim, the harasser and the College to keep in its records. The decision reached at the appeal hearing is final

3.4 Policy Objective 4: Discipline

Grievance Committees should use their best judgment as well as any institutional disciplinary policies to guide their decisions on application of disciplinary measures. The table below also outlines some suggestions for disciplinary measures based on the types and frequency of harassment that can occur.

Table 1 – Sexual harassment examples and suggested disciplinary actions

Hostile environment examples:	Suggested disciplinary action
<ul style="list-style-type: none"> - Unnecessary and unwanted nicknames such as, ‘sweetie’, ‘baby’, ‘girlfriend’ - Intrusive sexually explicit questions, asking personal questions about a person’s sex life 	<ul style="list-style-type: none"> - Verbal reprimand, warning to not repeat behaviour (with victim or anyone else) and a written query documenting that a warning has been given. - Ensure harasser understands why the behaviour deserves disciplinary action (it was

<ul style="list-style-type: none"> - Spreading rumours about a person’s sexuality, sexual activity or speculations about previous sexual experience - Remarks of a sexual nature about a person’s clothing or body 	<p>unwanted, inappropriate and made the victim uncomfortable) and writes a letter of apology to the victim</p> <ul style="list-style-type: none"> - If complaint happens again, harasser should be put on probation (see below).
<ul style="list-style-type: none"> - Unnecessary and unwanted touching, pinching, massaging, dancing, hugging or brushing up against a person’s body. - Sexually suggestive stares, sounds or gestures such as winking, licking lips, whistling, sucking noises or pelvic thrusts. - Sexually explicit jokes, pictures, calendars, cartoons, internet images or pornographic materials - Unwanted recurrence of telephoning, texting, emailing, comments on social media, following, stalking, gift giving, proposing or asking for a date. - Unwanted propositions of a sexual nature (including those occurring in situations that begin as reciprocal attractions, but later cease to be mutual). - Spying on someone that is engaged in intimate behaviors, such as undressing, bathing, sexual activity or any other activity that is considered to be private. 	<ul style="list-style-type: none"> - Verbal reprimand, warning to not repeat behaviour (with victim or anyone else) and a written query documenting that a warning has been given. - Ensure harasser understands why the behaviour deserves disciplinary action (it was unwanted, inappropriate and made the victim uncomfortable) and writes a letter of apology to the victim. - Harasser should be put on probation for one year. If another case occurs during probation, termination or expulsion should be considered. - If there are no complaints after one year of probation, the harasser should no longer be susceptible to termination/expulsion - If complaints do occur again after the probation has been completed, a second hearing should be conducted. The past offense should be noted and termination/expulsion should be considered.
<ul style="list-style-type: none"> - Actual or attempted rape or sexual assault 	<ul style="list-style-type: none"> - The police should be called immediately as this is a criminal offense - The harasser should be immediately terminated/expelled
<p>Quid pro quo examples:</p>	<p>Suggested disciplinary action</p>
<ul style="list-style-type: none"> - Direct or indirect promises of academic benefits (such as high grades, letters of recommendation, participation in an activity), in return for sexual favours. - Direct or indirect promises of work benefits (such as promotions, housing, allowances, letters of recommendation, good appraisals), in return for sexual favours. 	<ul style="list-style-type: none"> - Verbal reprimand, warning to not repeat behaviour (with victim or anyone else) and a written query documenting that a warning has been given. - Ensure harasser understands why the behaviour deserves disciplinary action (it was unwanted, inappropriate and made the victim uncomfortable) and writes a letter of apology to the victim.
<p>Retaliation examples:</p>	<ul style="list-style-type: none"> - Harasser should be put on probation for one year. If another case occurs during probation, termination or expulsion should be considered.
<ul style="list-style-type: none"> - Adverse academic decisions, evaluations, low grades, social exclusion, poor treatment in class, because a sexual advance has been rejected or reported. 	<ul style="list-style-type: none"> - If there are no complaints after one year of probation, the harasser should no longer be susceptible to termination/ expulsion.

<ul style="list-style-type: none"> - Adverse employment decisions, evaluations, failure to hire or promote, transfer, social exclusion, poor treatment in the workplace, because a sexual advance has been rejected or reported. 	<ul style="list-style-type: none"> - If complaints do occur again after the probation has been completed, a second hearing should be conducted. The past offense should be noted and termination/expulsion should be considered.
<p>False accusation by victim:</p> <ul style="list-style-type: none"> - If after a formal hearing it is determined that the victim has knowingly lodged a false accusation to harm, punish or defame the alleged harasser, he/she should also be subject to disciplinary action. 	<ul style="list-style-type: none"> - Verbal reprimand, warning to not repeat behaviour (with victim or anyone else) and a written query documenting that a warning has been given. - Ensure victim understands why the behaviour deserves disciplinary action (it constitutes lying and deceit) and writes a letter of apology to the alleged harasser. - Suspension based of the severity of the allegation

3.5 Policy Objective 5: To Provide Guidelines for Dissemination

Dissemination Guidelines:

1. Management should print and disseminate the Sexual Harassment Policy to all students, staff, TP school staff and community members. If cost of printing the entire policy is cost prohibitive, management should consider summarising the policy into a 1-2 page document – pulling out the most important points regarding definitions, reporting procedures and disciplinary actions.
2. The college Gender Champion and Gender Committee should ensure consistent sensitisation for all staff/students about the Policy and Safe Space focal people.
3. TPC should ensure consistent sensitisation of all TP school staff, Lead Mentors, Mentors and community members about this Sexual Harassment Policy and that they too are subject to disciplinary measures.
4. Management should consider creating a process in which all students, staff and TP staff sign a document stating that they understand and abide by this Sexual Harassment Policy of the College.

CHAPTER FOUR: Responsibility for Implementation

St Joseph’s College of Education shall be responsible and accountable for the overall implementation of the Sexual Harassment Policy. The National Council for Tertiary Education (NCTE), National Teaching Council (NTC) and the Principal’s Conference (PRINCOF) has oversight of college and could support where necessary. This section discusses the roles and responsibilities of stakeholders tasked with responsibility for the effective implementation of this Sexual Harassment Policy for the College.

Below is a table that shows the key institutions and stakeholders identified as central to the implementation of the Sexual Harassment Policy and indicates their specific roles in the implementation process.

Table 2 - Implementation Roles/Responsibilities

Institution	Implementation Roles/Responsibilities
St. Joseph's College of Education	<p>Gender Champion – leads on the sensitisation, implementation and monitoring of this policy. Should also act as a Safe Space focal person, if appropriate.</p> <p>Gender Committee – supports the Gender Champion in the sensitisation, implementation and monitoring of this policy. A member of the committee could also act as the other Safe Space focal person, if appropriate.</p> <p>Principal and senior management team – provide administrative support and management to the Gender Champion and Committee. Principal should act as chairperson of the Grievance Committee, if appropriate.</p>
NCTE	<ul style="list-style-type: none"> - Provides guidance on and monitoring of this policy in the College - Initiates and oversees any policy reviews/revisions if needed
NTC	<ul style="list-style-type: none"> - Provides guidance on and monitoring of this policy, particularly as it pertains to pre- and in-service teachers -Participates in any policy reviews/revisions if needed
PRINCOF	<ul style="list-style-type: none"> - Liaises with the college principal to ensure policy dissemination - Supports NCTE to provide guidance on and monitoring of this policy in the College. -Participates in any policy reviews/revisions if needed

CHAPTER FIVE: Responsibility for Monitoring, Implementation and Compliance:

This section outlines mechanisms put in place to monitor and evaluate the implementation of this policy. These mechanisms should provide timely and reliable data that can be used for decision-making and future policy review. Reporting formats should be developed at various levels of data collection to support harmonisation and analysis of the data.

Below is a table that shows the key institutions identified as central to monitoring the implementation of the Sexual Harassment Policy for St Joseph's College of Education. It also indicates their specific roles in the monitoring process.

Table 3 - Monitoring roles/responsibilities

Level	Monitoring roles/responsibilities
College level Monitoring	- The Gender Champion and Gender Committee are responsible for monitoring and evaluation of this policy within the College and TP schools. - Senior Management, staff and students should also contribute to monitoring and evaluation efforts, when/if applicable
District and Regional level Monitoring	Circuit Supervisors, Regional Girls' Education Officers and District Girls' Education Officers are responsible for monitoring and evaluation of this policy as it applies to TP and Basic schools
National level Monitoring	NCTE, NAB, NTC, PRINCOF are responsible for monitoring and evaluation of this policy in the College.

Policy Review

The Policy Review Committee shall review the policy at least once every five years to ensure that its objectives, priority areas and strategies continue to be relevant to the prevailing issues. The review should also assess the extent to which the various stakeholders responsible for the implementation of the policy work together in a tightly coordinated fashion to minimize the duplication of effort and wastage of resources.