LUMS SEXUAL HARASSMENT POLICY

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PREAMBLE

Lahore University of Management Sciences (hereinafter referred to as '**LUMS**') is guaranteed to be a safe space for all those who inhabit the institution in any capacity. To this end, any harassment, sexual or otherwise, is strictly prohibited under LUMS policy and national law.

LUMS affirms the right of every member of the LUMS Community to live, study, and work in an environment that is free from harassment. Behaviour constituting sexual harassment as defined in this Policy is incompatible with all recognized standards of professional ethics and with behaviour appropriate to an institution of higher learning.

Harassment is a violation of human rights, is demeaning to human dignity and is unacceptable in a healthy work and academic environment, specifically one in which scholarly pursuit may flourish. LUMS will not tolerate sexual harassment of any member of the LUMS Community and will strive through education and deterrence to create an environment free from such behaviour on its premises.

In furtherance of the above objectives, this Policy constitutes a sexual harassment committee which will help ensure a campus free from violations of human dignity; to clearly demarcate the limits of acceptable behaviour at any time on campus; to establish a functional, swift, fair and permanent mechanism for filing complaints of harassment, investigation of these complaints and redress of instances of harassment as defined by this Policy.

1. DEFINITIONS:

i. "Accused" means an individual belonging to the LUMS Community, against whom a Complaint of sexual harassment has been filed before the Inquiry Committee.

ii. "Appellate Body" means the body constituted under this Policy to hear appeals on the grounds listed herein.

iii. "The 2010 Act" refers to The Protection Against Harassment of Women at the Workplace Act, 2010.

iv. "Code of Conduct" means a guideline of the limits of acceptable behaviour as stipulated by the LUMS Student Code of Conduct, the Faculty Code of Conduct, other documents issued by LUMS which govern behaviour of members of the LUMS Community as well as the Code of Conduct provided in The 2010 Act, which is included as Annexure B to this Policy.

v. "Competent Authority" means the Vice Chancellor (VC) of LUMS, or a representative appointed by the VC to act on his/her behalf.

vi. "Complainant" means an individual aggrieved by the conduct of any member of the LUMS Community that may constitute sexual harassment.

vii. "Consent" means a voluntary agreement to another person's suggestion by a person possessing full mental capacity and being of legal age under Pakistani law. For the purposes of this Policy, consent means agreement that is explicitly, wilfully and unequivocally stated. Consent is retractable at any time during the course of the agreement or otherwise. Agreement obtained through duress, coercion, threats, any form of oppression, or while a person is incapacitated due to any reason, does not amount to consent.

viii. "Disciplinary Committee" means the committee that reports to the Office of Student Affairs and deals with, *inter alia*, infringements of academic standards, and substance consumption.

ix. "Harassment" includes, directly or by implication,

i. any unwelcome, non-consensual sexual gesture, advance or activity,
ii. persistent and unwelcome flirting, request for sexual favors, sexual innuendo,
iii. verbal or written communication (whether electronic or otherwise) of a loaded nature,
iv. non-consensual physical conduct of a sexual nature including assault, exploitation and sexual violence;
v. sexually demeaning attitudes;
vi. Stalking or otherwise interfering with someone's sexual privacy, such as taking pictures, videotaping, viewing or sharing explicit images without consent;
vii. causing interference with work performance or creating an intimidating, hostile or offensive campus environment, or
viii. the attempt or threat to punish the complainant for refusal to comply to requests for sexual favour, or
ix. the placing of a sexual favour as a condition for employment, promotion, grades or evaluation of a person's professional engagement in any activity.

Sexual harassment can be physical or psychological in nature. It may be perpetrated using electronic media as well as in person. An aggregation of incidents can constitute sexual harassment even if one of the incidents considered on its own would not constitute harassment.

Sexual harassment is especially egregious and will be sanctioned as such if the Inquiry Committee finds that the Accused knew or ought reasonably to have known that the Complainant/victim was in an impaired or incapacitated state. Impairment of the Accused, for instance due to the use of any illegal substances, shall not diminish their responsibility for harassment under this Policy.

This list is not exhaustive, and individual behaviours may be found to constitute harassment by the Inquiry Committee using this definition as a guideline.

Examples of sexual harassment actionable under this Policy are provided in Annexure A.

x. "HEC" means the Higher Education Commission of Pakistan, created by the Higher Education Commission Ordinance of 2002.

xi. "Inquiry Committee" means either the Sexual Harassment Inquiry Committee constituted pursuant to this Policy to hear, investigate and decide complaints of sexual harassment

under the 2010 Act, or the Harassment Review Board constituted pursuant to this Policy to
hear investigate and decide complaints of harassment that do not fall under the purview of the Sexual Harassment Inquiry Committee.

xii. "LUMS Community" means:
   a) The Board of Governors, all administrative, research, teaching and non-teaching employees of LUMS, as well as students (including interns);
   b) Individuals working at LUMS through a service provider that has a contract or arrangement with LUMS;
   c) Stakeholders such as students/employees seeking to join the LUMS Community; and
   d) individuals present on the LUMS campus for any reason.

xiii. "Office of Accessibility and Inclusion" (also referred to as "OAI") means the office at LUMS that houses the Inquiry Committee. This office is responsible for record keeping and confidentiality of all parties to a complaint.

xiv. "Ombudsperson" means the office of the Ombudsperson, Government of Punjab provided for by the 2010 Act.

xv. "Student Counselling Office" means the committee that reports to the Office of Student Affairs and is responsible for, *inter alia* the provision of counselling services to students.

2. INQUIRY COMMITTEE

APPOINTMENT AND CONSTITUTION

A. The Competent Authority shall appoint a pool of at least nine (9) members, at least five (5) of whom shall be women. This pool may go up to a maximum ten (10) members and will constitute the standing committee for inquiries into complaints of sexual harassment. The pool shall include the following individuals.
   i. There shall be one (1) Convenor of the Inquiry Committee, who shall be appointed from the Office of Accessibility and Inclusion. The Convenor shall be a permanent member in each complaint and shall be appointed for a renewable 5-year term. The Convenor shall be the Chair of the Inquiry Committee.
   ii. There shall be at least one (1) member from senior management at LUMS and/or one (1) senior representative of employees or a senior employee;
   iii. There shall be eight (8) members, at least four (4) of whom shall be women, appointed from faculty for two (2) year terms on a staggered basis to provide for continuity of experience.

B. Each time a complaint is received by the Office of Accessibility and Inclusion, the Convenor shall select two (2) members to constitute the Inquiry Committee along with the Convenor to hear and decide the jurisdiction in which the inquiry shall proceed.

i. This selection shall be made with regard to the number of complaints being heard by members of the pool at the time and will be made in light of any objections that may be raised by the parties to the complaint.

Provided where LUMS is unable to designate three (3) members from within, as stated above, they can be co-opted from outside LUMS.

C. The quorum for the exercise of any of the powers or duties of the Inquiry Committee shall be three (3) members, at least one (1) of whom shall be a woman. D. No member shall serve for more than two (2) consecutive terms.

E. Former members will be eligible for re appointment after a gap of two (2) years since completion of the last term.

F. No individual who has been found guilty by the Inquiry Committee shall be eligible to serve on the Inquiry Committee:
   i. The imposition of a minor penalty will cause an individual to be ineligible to serve on the Inquiry Committee for five (5) years, and
   ii. The imposition of a major penalty will cause the individual to be ineligible to serve on the Inquiry Committee for as long as they are a member of the LUMS Community.

G. The Competent Authority may consider reappointing at least one (1) member of the pool described in clause 2(A) hereinabove for two (2) consecutive terms for institutional continuity.

H. Shorter terms may be required occasionally to fill vacancies.

I. Altered composition in specific cases
   i. In case a complaint is made against one (1) of the members of the Inquiry Committee that member shall be replaced by another for that particular case in the manner provided for in Clause 5(A)(iii)(c).
      a) During the pendency of inquiry against an individual member of the Inquiry Committee, the individual shall be immediately relieved of all their duties as a member of the Inquiry Committee.
   ii. The Office of Accessibility and Inclusion may also alter the composition of the Inquiry Committee on a case-by-case basis to address the valid objections of any of the parties involved in the inquiry, as determined fairly by the Competent Authority.

J. A list of the members comprising the pool for the Inquiry Committee is appended to this Policy as Appendix D.

3. POWERS OF THE INQUIRY COMMITTEE

A. The Inquiry Committee shall have the power to inquire into the matters of harassment under this Policy, whether through the initiation of a complaint or on the receipt of information indicating that harassment as defined in this Policy may have occurred.

B. The Inquiry Committee has the power to get the Complainant or the Accused medically examined by an authorized doctor, if necessary, and may recommend appropriate penalty against the Accused as provided for in this Policy.

C. The Inquiry Committee shall have the power to:

i. summon and enforce attendance of any person and examine the person on oath;
ii. require the discovery and production of any document;
iii. receive evidence on affidavits; and
iv. record evidence.

D. The Inquiry Committee shall have the power to transfer a complaint to the Disciplinary Committee if the matter is found to fall within their jurisdiction.

E. The Inquiry Committee may recommend appropriate action to the Competent Authority or the Ombudsperson, as the case may be, against the Complainant if allegations levelled against the accused are found to be false and made with mala fide intentions. The Inquiry Committee may also recommend appropriate action to the Competent Authority against parties who are found to have perjured themselves during the course of the inquiry.

Explanation: Allegations of sexual harassment made out of malice or intent to hurt the reputation of the person against whom the complaint is filed are considered complaints made with mala fide intentions. Making a mala fide allegation of sexual harassment knowing it to be false, whether in a formal or informal context, constitutes a serious violation of this Policy. However, a complaint cannot be taken as false or as an illustration of mala fide intention simply on account of it not being proved.

F. The Inquiry Committee may, if it deems fit, issue interim no-contact or other orders between the Complainant and the alleged accused. The LUMS administration may also be requested to send the Accused on leave or suspend the Accused in accordance with the applicable procedures for dealing with the cases of misconduct, if required.

G. The Inquiry Committee shall ensure that no individual or department at LUMS or the Accused creates a hostile environment for the Complainant so as to pressurize them or hinder them from freely pursuing their complaint. It shall also ensure that there is no reprisal or threats against any member of the LUMS Community who makes use of this Policy whether formally or informally, as a complainant or a witness. Such behaviour will be investigated, and if proven to have occurred, will be awarded appropriate disciplinary sanction.

H. Where a procedural matter arises that is not dealt with in this Policy, the Inquiry Committee has the authority to establish an appropriate procedure in line with principles of fairness and natural justice.

I. Decisions of the Competent Authority on the recommendations of the Inquiry Committee shall be binding.

J. The Inquiry Committee shall act through its Convenor.

4. FILING A COMPLAINT

A. Immediate response

i. In case the Complainant is in trauma LUMS will arrange for psycho-social counselling or medical treatment and for additional medical leave.
ii. The Complainant may reach out to, or be directed by the Inquiry Committee to contact the OAI or the Student Counselling Office for support while the inquiry commences and proceeds.
iii. The Inquiry Committee may issue a no-contact order in further of its powers under Clause 3(F) at the time a complaint is received.

B. Interim Measures
i. The Complainant or the Inquiry Committee may reach out to OAI to request interim measures including adjustment in class or examination schedules for the purposes of attending hearings, or request a change in work assignments, class sections or that evaluation be conducted by a neutral person, to assist the Complainant during the inquiry or other measures deemed appropriate by the Inquiry Committee.

C. Informal Inquiry Proceedings
i. The Complainant may request informal proceedings provided in Annexure C to this Policy. These proceedings are covered by the process visually laid out in Annexure F.

D. Formal Inquiry Proceedings
i. A Complainant may initiate a formal inquiry process by filing a written complaint to the Convenor of the Inquiry Committee or the OAI. The process to be followed in a formal inquiry is visually laid out in Annexure F.
ii. The written complaint shall be in the format provided for on the website of the Office of Accessibility and Inclusion. The format may also be requested via email at harassment@lums.edu.pk or oai@lums.edu.pk

5. GUARANTEES IN AN INQUIRY

A. Confidentiality and fair treatment
i. All complaints and identity of Complainant(s) and the Accused shall be kept highly confidential throughout the process of complaint, inquiry and appeal.
ii. All hearings shall be private and closed.
iii. The Complainant, the Accused, and any other parties to proceedings under this Policy are to be treated fairly. This may involve the making of special arrangements, such as follows:
a. Where the Complainant at the time of making a complaint is either a student or instructor of the Accused, the LUMS administration may, in appropriate circumstances, after the Accused has been informed that a complaint has been made, and after receiving recommendations from the Inquiry Committee, make arrangements with the appropriate administrator for certain work and examinations of the student to be supervised and evaluated by a neutral person.
b. Where the Complainant is a staff member whose performance is normally evaluated by the Accused or vice versa, the Complainant is to receive fair employment treatment and protection from adverse employment-related consequences during the procedures of the trial. To that end, LUMS may, after the Accused has been informed that a complaint has been made, and in consultation with the Complainant, have the Complainant's performance

assessed by another administrator and where practicable temporarily reassign the Complainant/Accused until the complaint is resolved. These assurances shall also be offered to witnesses in a case.

c. If the Complainant, Accused or any other party to the proceedings fears bias on part of any of the members of the Inquiry Committee or Appellate Body, they may file a written complaint to the Competent Authority, who, after hearing both sides, shall decide within 5 (five) days whether to replace the concerned member for that particular matter. The decision of the Competent Authority in this matter shall be final. iv. The following provisions shall be followed by the Inquiry Committee in relation to any inquiry:

a. The statements and other evidence acquired in the inquiry process shall be confidential.
b. Both parties, the Complainant and the Accused, shall have the right to be represented or accompanied by a representative, a friend or a colleague.
c. Subject to Clause 3(E)) regarding mala fide complaints, adverse action shall not be taken against the Complainant or any witness;

6. PROCESS OF AN INQUIRY

JURISDICTION

A. Upon receiving a complaint, the Convenor shall constitute a three (3) member committee by inviting two (2) members from the pool described in Clause 2(A) to join the Convenor. Within five (5) days, but no later than seven (7) days after receiving the complaint, this committee shall review the contents of the complaint and may conduct preliminary interviews of the Complainant and Accused in order to determine whether jurisdiction lies under this Policy.
   a. If the matter lies within the purview of the 2010 Act, then this committee shall proceed with the inquiry as the Sexual Harassment Inquiry Committee, deriving its jurisdiction from this Policy and the 2010 Act in which situation in case there is any conflict between the provisions of this Policy and The 2010 Act the terms of The 2010 Act shall prevail.
   b. If the matter does not lie within the purview of the 2010 Act but does fall within the parameters of this Policy, then this committee shall proceed with the inquiry as the Harassment Review Board, deriving its jurisdiction from this Policy alone.
   c. If the matter does not fall within the scope of this Policy at all, the committee shall forward the complaint to the relevant office at LUMS.
B. Having decided the question of jurisdiction, the Inquiry Committee shall now commence its formal inquiries. Preferably within two (2) days, but no later than three (3) days of commencement of the inquiry, the Inquiry Committee shall:
   i. Forward the charge along with a copy of the written complaint to the Accused, a formal written receipt of which will be given. The Inquiry Committee may contact the Complainant to seek clarification on any matter in this regard.
C. The Inquiry Committee shall require the Accused within seven (7) days from the day the charge is communicated to the Accused individual to submit a written defence and on a failure to do so without reasonable cause, the Inquiry Committee shall proceed *ex parte*.

D. The Committee shall proceed to enquire into the charge and may examine such oral or documentary evidence in support of the charge or in defence of the Accused as the Committee may consider necessary and each party shall be entitled to cross-examine the witnesses against them.
E. The Inquiry Committee will hear and record statements from the Complainant(s) and Accused, and the witnesses (as required) and examine any other documents and/or evidence as presented by the relevant parties.
F. The Inquiry Committee has discretion to limit testimony and questioning of witnesses to those matters it considers relevant to the disposition of the case. The Inquiry Committee also has the power to compel a witness to attend, and the Complainant(s) and/or Accused may request the Convenor's aid in this regard.
G. The Inquiry Committee has 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 inquiry.
H. Following the hearing, the members of the Inquiry Committee shall deliberate and discuss the evidence presented before them along with other information they may deem relevant. The Inquiry Committee members shall reach a decision unanimously or by a majority after the deliberations. Where the complaint is found to be valid, the Inquiry Committee will recommend an appropriate penalty as prescribed by this Policy.
I. The Inquiry Committee shall submit its final decision in writing by recording its reasons, findings and recommendations to the Competent Authority within thirty (30) days of the initiation of inquiry, or as soon as is reasonably possible, in the form of a written report. This report shall record the reasons for the decision, including any note of dissent. If the Inquiry Committee finds the Accused to be guilty it shall recommend to the Competent Authority the imposition of one (1) or more of the penalties provided in Clause 8(D) depending on whether it is exercising jurisdiction as the Sexual Harassment Inquiry Committee or the Harassment Review Board.
J. The Competent Authority shall impose the penalty recommended by the Inquiry Committee within one (1) week of the receipt of the recommendations of the Inquiry Committee.

7. APPEALS

A. Appellate Body, Appointment and Constitution
    i. The Competent Authority shall appoint an Appellate Body comprising of three (3) individuals, at least one (1) of whom shall be a woman, and one (1) shall be from senior administration.
    ii. None of the members of the Inquiry Committee shall be a member of the Appellate Body.
    iii. The members shall be appointed for a fixed two (2) years term, which shall be renewable once. No member shall serve for more than two (2) consecutive terms.
    iv. Former members will be eligible for re-appointment after a gap of two (2) years since completion of the last term.
    v. The Competent Authority may consider re-appointing at least one (1) member of the Appellate Body for two (2) consecutive terms for institutional continuity.
    vi. Shorter terms may be required occasionally to fill vacancies.
B. Altered composition in specific cases

i. In case a complaint is made against one (1) of the members of the Appellate Body, that member shall be replaced by another member for that particular case in the manner provided for in Clause 5(A)(iii)(c).
ii. The Competent Authority may also alter the composition of the Appellate Body on a case-by-case basis to address the valid objections of any of the parties involved in the inquiry, as determined fairly by the Competent Authority.

C. Powers of the Appellate Body
   i. The Appellate Body shall have powers similar to those of the Inquiry Committee.
   ii. In order to reach its decision, the Appellate Body may communicate with the parties, members of the Inquiry Committee, or other members of the LUMS Community as it deems fit.

D. Appeal from the Sexual Harassment Inquiry Committee
   i. When the decision of the Competent Authority falls within the scope of The 2010 Act, any party aggrieved by such decision may, within thirty (30) days of written communication of the decision, prefer an appeal to the Office of the Ombudsperson as stipulated in The 2010 Act.

E. Appeal from the Harassment Review Board
   a. When the decision of the Competent Authority does not fall within the scope of The 2010 Act, any party aggrieved by such decision may, within thirty (30) days of written communication of the decision prefer an appeal to the Appellate Body in the manner specified below.

F. An appeal to the Appellate Body may only be filed on the following grounds:
   a. The conduct complained about does not fall within the scope of this Policy.
   b. The Inquiry Committee failed to consider material information while making its decision.
   c. The penalty imposed is deemed unfair due to it being disproportionate or material different from penalties historically imposed by the Inquiry Committee for similar misconduct.
   d. The adjudication process followed by the Inquiry Committee was procedurally unfair.

G. The Appellate Body may, on consideration of the appeal and any other relevant material, confirm, set aside, vary or modify the recommendations of the Inquiry Committee within thirty (30) days and shall communicate its decision to both the parties, the Competent Authority and the Inquiry Committee.

8. PENALTIES AND REMEDIES

A. If sexual harassment is proved against someone who is working at LUMS through a service provider that has a contract with LUMS, LUMS can, if the behaviour warrants it, prevent the Accused from working at LUMS. However, LUMS does not have authority over the individual's work agreement with the relevant service provider.

B. LUMS will inform all external agencies/service providers who do business on the LUMS campus of the existence of this Policy and LUMS shall also obtain undertakings from them that they shall ensure the implementation of this Policy and the Code of Conduct within their organisations while providing services to LUMS.

C. In matters where the Accused person is not a member of the LUMS Community and has no recurrent presence either through business or contract, such as a visitor to campus, the Inquiry Committee may recommend sanctions which may be appropriately imposed.
D. If the Inquiry Committee finds the Accused to be guilty it shall recommend the imposing of one (1) or more of the following penalties to the Competent Authority:
    i. Minor penalties:
        (a) Warning letter
        (b) censure;
        (c) removal from any position of authority at LUMS, including positions in student societies and academic positions such as teaching and research assistants;
        (d) a ban on the ability to represent LUMS at any conference, tournament or competition of any sort;
        (e) compulsory training and community service hours to be spent under the Office of Accessibility and Inclusion;
        (f) withholding, for a specific period, promotion or increment;
        (g) stoppage, for a specific period, at an efficiency bar in the time-scale, otherwise than for unfitness to cross such bar; and
        (h) recovery of the compensation payable to the Complainant from pay or any other source of the Accused;
        (i) separation from LUMS for one semester ii. Major penalties:
        (a) reduction to a lower post or time-scale, or to a lower stage in a time-scale;
        (b) compulsory retirement;
        (c) Disciplinary probation;
        (d) Revocation of access to campus and its facilities;
        (e) Relocation from campus housing;
        (f) removal from service;
        (g) dismissal from service;
        (h) permanent ban from holding any position of authority at LUMS, including positions in student societies and academic positions such as teaching and research assistants;
        (i) separation from LUMS for one (1) year;
        (j) Inclusion of adverse decision on a student's academic record or employee file; (k) expulsion from LUMS; and
        (l) fine to be given to LUMS. This fine will be used to mitigate the damage caused to the Complainant, including but not limited to compensation.

9. FOLLOW UP BY THE INQUIRY COMMITTEE

A. The Inquiry Committee or the Appellate Body, as the case may be, shall meet on regular basis and monitor the situation regularly until they are satisfied that their recommendations subject to decision, if any, of the Competent Authority, the LUMS appeal process and the Ombudsperson appointed under the 2010 Act, have been implemented.
B. LUMS may also offer compensation to the Complainant in case of loss of salary or other damages.
C. Members of the LUMS Community have an obligation to cooperate in an inquiry; refusal to cooperate may result in disciplinary action.

D. Objective documentation of the proceeding of the Inquiry Committee shall be maintained by audio recording, and high confidentiality of the records and other such material shall be upheld at all times.
E. All parties will bear their own costs related to the proceedings. The Inquiry Committee will not order or recommend the payment of costs, including any legal costs, of the proceedings to any party.
F. LUMS shall prohibit reprisals or threats of reprisal against any member of the LUMS Community who formally or informally avails of this Policy as there is a possibility of further victimization or hindrance in the launching of complaints. LUMS prohibits threats or actions against anyone who participates in proceedings held under its jurisdiction.
G. Retaliation or any other action against the Complainant is to be taken seriously under the provisions of this Policy. All allegations of retaliation would be investigated formally under the purview of this Policy, and if substantiated, would result in appropriate disciplinary action.

10. EDUCATION AND AWARENESS

A. The Office of Accessibility and Inclusion will periodically undertake awareness campaigns on the physical and digital campus.
B. OAI and the Inquiry Committee are dedicated to ensuring the prevention and deterrence of sexual harassment through education, sensitization, and as a last resort, through deterrence and punishment.
C. More information regarding harassment and how to make our campus a safer place is available on the OAI website: www.oai.lums.edu.pk
D. OAI will be conducting mandatory sensitization workshops for members of the LUMS Community.

11. RECORD KEEPING AT THE OFFICE OF ACCESSIBILITY AND INCLUSION

A. All notes and records arising from procedures of an informal or formal resolution of a case of sexual harassment under this Policy shall be maintained in a permanent confidential file with the Office of Accessibility and Inclusion at LUMS.
B. The notes/records referred to above shall be maintained by the individual appointed to assist the Inquiry Committee. No one apart from this person and the Inquiry Committee shall have access to the see records, except as otherwise instructed by the Inquiry Committee.
C. Members of the pool that form the Inquiry Committee will attend trainings by professionals in the field to learn about the particular sensitivities that surround issues of sexual harassment, the procedures that effect fair resolutions, gender equality, trauma management, and the penalties and sanctions appropriate to the various breaches of this Policy or violations of the law and deterrents to further such breaches or violations. This training will not deal with specific cases currently before the Inquiry Committee and is in no way meant to fetter the independence of any Inquiry Committee member to decide any

case on the basis of the evidence presented in that case and according to the individual's understanding and conscience.

ANNEXURE A

EXAMPLES OF SEXUAL HARASSMENT

The following are examples of instances that constitute harassment:

A. Asking students to meet supervisors/authorities in-charge out of the institution's premises with the promise of improvement in grades.
B. Financial and sexual gratification from graduate students (PhD, M-Phil, Masters) by their supervisors.
C. Intimidation of faculty/staff by students/colleagues in order to tarnish the reputation (character assassination) of faculty/staff.
D. Harassment by senior students of junior students, or minority students.
E. Unwelcome sexual advances – whether they involve physical touching or not.
F. Asking students to visit personal offices of their supervisors/authorities in charge after office hours to discuss their grades and assignments and using these visits to make unwelcome sexual conversation or sexual advances or any nature.
G. Sexual epithets, jokes, written or oral references to sexual conduct, or gossip regarding one's sex life.
H. Comments on an individual's body, comments about an individual's sexual activity, deficiencies, or prowess; displaying sexually suggestive objects, pictures, or cartoons.
I. Unwelcome staring, whistling, brushing against the body, sexual gestures, or suggestive or insulting comments.
J. Inquiries into one's sexual experiences.
K. Discussion of one's sexual activities (even if males are discussing this, it is done deliberately in front of female students or colleagues).
L. Using derogatory and abusive language that refers to others' mother's or sister's or daughter's bodies.
M. Acts of sexual connotation relating to the same as a common usage in conversation.
N. A senior employee or an instructor deliberately touching or hitting the body of another employee or student with a stationery item.
O. Male teacher referring to female bodies and reproductive cycles to embarrass female students during class lectures.
P. Ogling at female student's bodies.
Q. Needy students given financial support by faculty member in exchange for sexual favours.
R. Teacher telling vulgar jokes with sexual innuendos during classes.
S. Supervisors/teachers spending long hours locked away in office with a young colleague or student.
T. A male student making vulgar comments about a female student on social media or verbally relating vulgar material about her to his fellow students.
U. Students sending written notes and emails with requests for intimacy in exchange for grades.
V. Character assassination of teachers to gain political, academic, or financial gains
W. Student initiating intimacy for benefits of grades, employment or finances.
X. Using vulgar language to address females or males or any other gender (student, faculty and other employees).
Y. To touch one's intimate parts in the presence of others without any reason.

Z. Transferring a younger member of the faculty to another department against their will by the authorities as a punitive measure for not complying with undue requests for sexual favours.

AA. Threatening students or faculty by using forged/fake documents and pictures to blackmail them into compliance.

BB. Anonymous letters/pamphlets/e-mails leading to character assassination of employees/teachers/students.

ANNEXURE B

CODE OF CONDUCT

Whereas it is expedient to make the Code of Conduct at the Workplace etc to provide protection and safety to women against harassment it is hereby provided as under:

i. The Code provides a guideline for behavior of all employees, including management, and the owners of an organization to ensure a work environment free of harassment and intimidation;

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

The above is unacceptable behavior in the organization and at the workplace, including in any interaction or situation that is linked to official work or official activity outside the office.

Explanation:

There are three significant manifestations of harassment in the work environment:

(a) Abuse of authority

A demand by a person in authority, such as a supervisor, for sexual favors in order for the complainant to keep or obtain certain job benefits, be it a wage increase, a promotion, training opportunity, a transfer or the job itself.

(b) Creating a hostile environment

Any unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature, which interferes with an individual's work performance or creates an intimidating, hostile, abusive or offensive work environment.

The typical "hostile environment" claim, in general, requires finding of a pattern of offensive conduct, however, in cases where the harassment is particularly severe, such as in cases involving physical contact, a single offensive incident will constitute a violation.

(c) Retaliation

The refusal to grant a sexual favor can result in retaliation, which may include limiting the employee's options for future promotions or training, distorting the evaluation reports, generating gossip against the employee or other ways of limiting access to the employee's rights. Such behavior is also a part of the harassment.

iii. An informal approach to resolve a complaint of harassment may be through mediation between the parties involved and by providing advice and counseling on a strictly confidential basis;

iv. A complainant or a staff member designated by the complainant for the purpose may report an incident of harassment informally to their supervisor, or a member of the Inquiry

Committee, in which case the supervisor or the Committee member may address the issue at their discretion in the spirit of this Code. The request may be made orally or in writing;

v. If the case is taken up for investigation at an informal level, a senior manager from the office or the head office will conduct the investigation in a confidential manner. The alleged accused will be approached with the intention of resolving the matter in a confidential manner;

vi. If the incident or the case reported does constitute harassment of a higher degree and the officer or a member reviewing the case feels that it needs to be pursued formally for a disciplinary action, with the consent of the complainant, the case can be taken as a formal complaint;

vii. A complainant does not necessarily have to take a complaint of harassment through the informal channel. They may launch a formal complaint at any time;

viii. The complainant may make formal complaint through their incharge, supervisor, CBA nominee or worker's representative, as the case may be, 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;

ix. Assistance in the inquiry procedure can be sought from any member of the organization who should be contacted to assist in such a case;

x. The employer shall do its best to temporarily make adjustments so that the accused and the complainant do not have to interact for official purposes during the investigation period. This would include temporarily changing the office, in case both sit in one office, or taking away any extra charge over and above their contract which may give one party excessive powers over the other's job conditions. The employer can also decide to send the accused on leave, or suspend the accused in accordance with the applicable procedures for dealing with the cases of misconduct, if required;

xi. Retaliation from either party should be strictly monitored. During the process of the investigation work, evaluation, daily duties, reporting structure and any parallel inquiries initiated should be strictly monitored to avoid any retaliation from either side;

xii. The harassment usually occurs between colleagues when they are alone, therefore usually it is difficult to produce evidence. It is strongly recommended that staff should report an offensive behavior immediately to someone they trust, even if they do not wish to make a formal complaint at the time. Although not reporting immediately shall not affect the merits of the case; and

xiii. The Code lays down the minimum standards of behavior regarding protection of women from harassment at workplace etc but will not affect any better arrangement that an organization may have developed nor will it bar the grant of protection that employees working in an institute may secure from their employers through negotiation.

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xiv. In the interest of clarity:

a. Any reference to the female sex in the Code of Conduct above includes all genders.

b. While the Code of Conduct refers to relations of employment, it will apply equally to relations within the university, including student-and-instructor, student-andstudent, relations between and among colleagues, staff, management, and any other relation that exists on campus.

ANNEXURE C

PROCEDURE FOR INFORMAL RESOLUTION

1. The primary objective of the informal resolution process is problem solving, to stop the offending behaviour. The request for an informal resolution may be made orally or in writing.

2. If the incident or the case reported does constitute sexual harassment of a higher degree and the Inquiry Committee feels that it needs to be pursued formally for disciplinary action, then, with the consent of the complainant, the case may be taken up as a formal complaint.

3. The informal resolution will not directly or indirectly prejudice the integrity and objectives of the Policy.

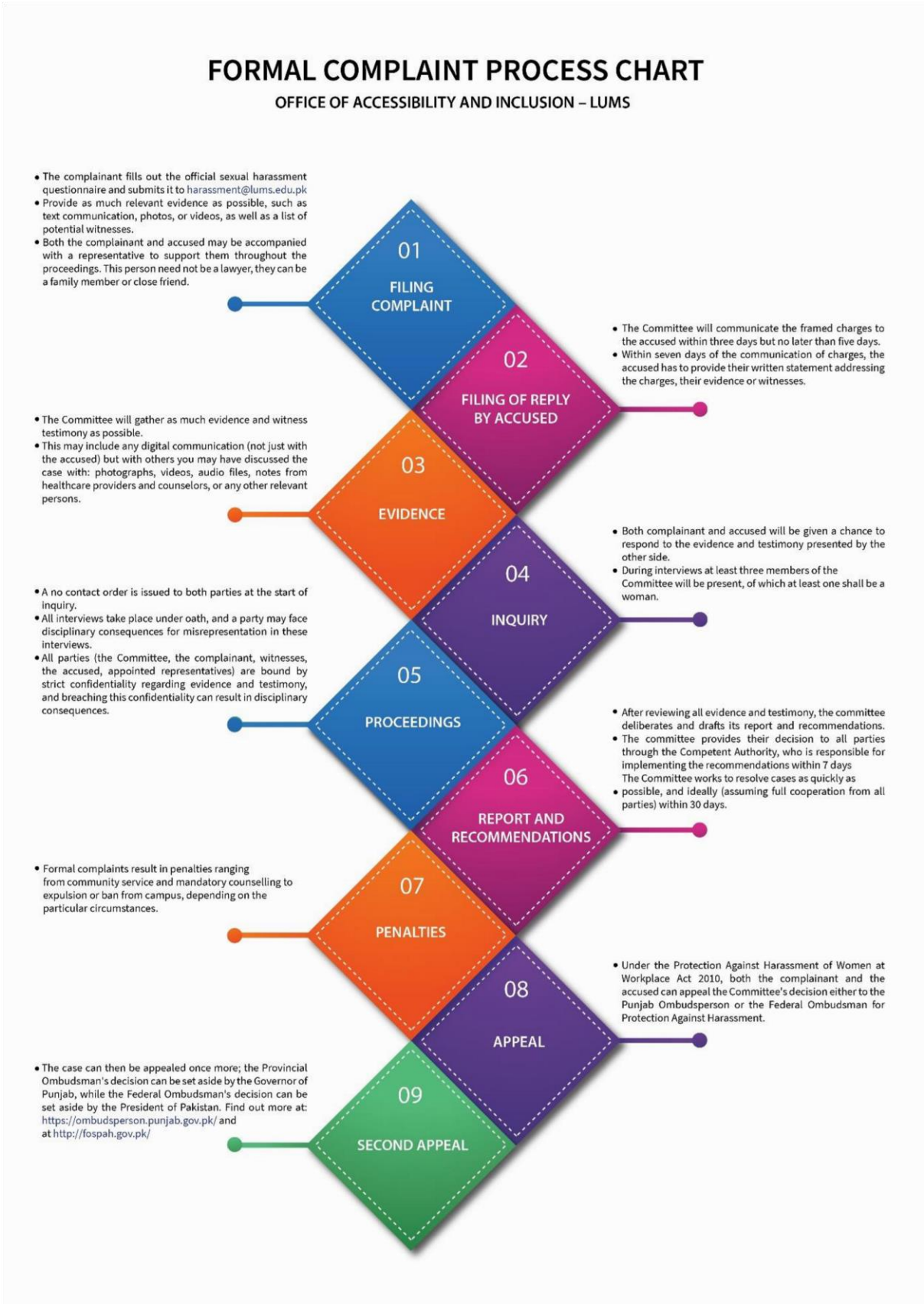
4. If resolution is achieved through informal procedures, a Resolution Report prepared by the Inquiry Committee shall be signed by the complainant and the accused. Should the resolution include an action or remedy by LUMS, that aspect of the Resolution Report must also be agreed to, signed and, with respect to that aspect, enforced by the member of the LUMS Community with the authority for ensuring that the remedy is imposed or enforced. All parties shall receive a copy of the report and a copy shall be retained in the confidential files.

5. If no resolution can be reached, the Inquiry Committee shall inform the complainant of their options, such as that of filing a case formally.

Annexure D
Composition of the Sexual Harassment Inquiry Committee
As of 1st January 2021

1. Ms. Shaharbano Raza – Office of Accessibility and Inclusion (Convener)
2. Dr. Ayesha Masood – Faculty, SDSB
3. Ms. Ayesha Khan – Member of Staff, SDSB
4. Dr. Amber Riaz – Faculty, MGSHSS
5. Dr. Sanval Nasim – Faculty, MGSHSS
6. Dr. Sadia Zulfiqar – Faculty, MGSHSS
7. Dr. Zubair Abbasi – Faculty, SAHSOL
8. Dr. Zubair Khalid – Faculty, SSE
9. Dr. Zahra Lakdawala – Faculty, SSE
10. Dr. Mariam Haider – Faculty, SOE

Annexure E
Process Flowcharts



INFORMAL COMPLAINT PROCESS CHART

OFFICE OF ACCESSIBILITY AND INCLUSION – LUMS

