



**UniMAC**  
UNIVERSITY OF MEDIA, ARTS AND COMMUNICATION

# BULLETIN

## ANTI-SEXUAL HARASSMENT POLICY

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**ANTI-SEXUAL HARASSMENT  
POLICY**

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## **Forward**

At the University of Media, Arts, and Communication (UniMAC), we are committed to promoting an environment where respect, dignity, and inclusion are at the core of our academic and professional community. We believe that every individual; whether student, faculty, staff, or visitor, has the inalienable right to work and learn in a space free from any form of harassment, intimidation, or discrimination. Sexual harassment, in particular, remains one of the most pervasive barriers to equality, trust, and professional integrity.

As a university that values creativity and collaboration, we recognize that the impacts of sexual harassment extend far beyond individuals, corroding the very foundation of academic excellence and innovation. Our institutional ethos is built upon mutual respect, and we take seriously our responsibility to uphold the highest ethical standards in all interactions. This Anti-Sexual Harassment Policy is not just a compliance measure but a testament to our unwavering commitment to protecting and empowering every member of the UniMAC community.

We value and celebrate diversity, knowing that it is critical to achieving our strategic vision and long-term success. We also recognize that the right to work and learn with dignity is a fundamental human right, and we acknowledge that any form of sexual harassment not only harms individuals but also has far-reaching consequences for our institution and society as a whole.

At UniMAC, we stand resolute in our stance against sexual harassment. We echo the principles upheld by global institutions, recognizing that gender-based violence is a violation of human rights and a hindrance to progress. Therefore, any form of harassment, whether perpetrated by or against students, faculty, staff, or visitors, within or beyond our campus (including study abroad programs, internships, and off-campus learning experiences) will not be tolerated. We encourage all members of our community to report such incidents without fear of victimization, knowing that their concerns will be addressed with seriousness and sensitivity.

We adopt a zero-tolerance policy towards any form of sexual harassment. Those found culpable will be subject to strict disciplinary actions, including dismissal or expulsion, as appropriate. This policy applies to all members of the UniMAC community, ensuring that our institution remains a safe, inclusive, and empowering space for all.

Together, we can cultivate a culture of respect, accountability, and dignity, setting a benchmark for excellence in combating sexual harassment. I urge each member of our university to embrace this policy wholeheartedly and contribute actively to making UniMAC a model institution where safety, equality, and justice are upheld at all times.

**Prof. Eric Opoku Mensah**

Vice Chancellor, (UniMAC)

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## **1.0 Introduction**

Sexual harassment remains one of the most pervasive and damaging forms of discrimination, deeply rooted in societal structures and cultural norms. It transcends workplace boundaries and invades personal and professional lives, often under the guise of power dynamics or misplaced notions of desire. This issue disproportionately affects women, creating barriers to equality and reinforcing gender hierarchies that undermine the principles of dignity and respect.

Globally, the recognition of sexual harassment as a critical issue has grown significantly over the past decade. Organisations such as the Committee on the Elimination of Discrimination Against Women (CEDAW) and the International Labour Organisation (ILO) emphasise sexual harassment as a serious violation of human rights and a manifestation of sex-based discrimination. Both bodies advocate for the integration of anti-sexual harassment policies as essential components of broader frameworks addressing gender equality and workplace integrity.

In Ghana, acts of sexual violence, including harassment, are considered serious offenses under the Criminal Offenses Act 1960 (Act 29) and the Criminal and Other Offenses (Procedure) Act 1960 (Act 30), punishable by substantial penalties. Drawing from these legal frameworks, UniMAC's Anti-Sexual Harassment Policy is tailored to ensure compliance with such statutes while promoting a positive culture of respect and inclusivity on campus. This policy also draws on global standards set by organisations such as the International Labour Organisation (ILO) and the Committee on the Elimination of Discrimination Against Women (CEDAW), which emphasise addressing sexual harassment as a human rights issue and a barrier to equality.

In higher education settings like UniMAC, where creativity and collaboration are paramount, the impacts of sexual harassment are particularly profound. Beyond the immediate harm to individuals, it erodes trust, damages professional relationships, and stifles the intellectual growth of the entire community. The university's commitment to addressing this issue aligns with its foundational values of fostering a safe, inclusive, and empowering environment for all.

This policy acknowledges that addressing sexual harassment is not merely about responding to incidents but also about transforming the underlying societal and cultural attitudes that perpetuate it. UniMAC believes that implementing robust preventive measures, clear reporting mechanisms, and unwavering support for victims will help tackle sexual harassment thereby setting a standard for excellence in cultivating respect and equality within its community.

### **1.1 Policy Aims**

The University of Media, Arts, and Communication (UniMAC) is committed to maintaining a safe, respectful, and inclusive environment for all students, staff, and visitors. This policy outlines UniMAC's commitment to preventing and addressing sexual harassment in compliance with applicable laws, ethical practices, and institutional values. As such, this policy is intended to guide the development and maintenance of awareness of inappropriate sexual behaviour and misconduct, in an institutional environment and on traditional and digital media. This Policy is also to serve as a guide steering how sexual harassment and related issues are to be handled and how to avoid such occurrences. Thus, this policy clarifies the nature of sexual behaviour which constitutes sexual harassment, specify individual rights and responsibilities in relating to one another and applies appropriate sanctions as needed in a manner that is fair to all parties involved.

### **1.2 Scope**

This policy applies to all members of the UniMAC community, including but not limited to:

- i. Students (full-time, sandwich, and exchange); Faculty and Staff (permanent, temporary, and adjunct); Contractors, Vendors, and Third-party affiliates; Visitors and Guests on campus premises.
- ii. The policy extends to all university-related activities and interactions, both on and off campus, including academic settings, co-curricular activities approved by UniMAC, internships, and online or virtual interactions.

For avoidance of doubt, this policy shall be incorporated in all agreements entered by UniMAC with independent parties that it interacts with.

### **1.3 Policy Objectives**

Among other things, the Anti-sexual harassment policy seeks to promote;

- i. **Prevention and Awareness:** To cultivate a culture of respect and inclusivity by implementing comprehensive training programmes, public awareness campaigns, and educational initiatives focused on preventing sexual harassment.
- ii. **Robust Reporting Mechanisms:** To establish multiple accessible, secure, and confidential channels for reporting incidents of sexual harassment, ensuring victims feel supported and empowered to come forward.
- iii. **Fair and Transparent Investigations:** To ensure all complaints are handled with impartiality, confidentiality, and professionalism through clearly defined investigation procedures and timelines.

- iv. **Support and Protection for Victims:** To provide comprehensive support services, including counseling, academic accommodations, and legal assistance, while protecting complainants from retaliation.
- v. **Accountability and Enforcement:** To enforce zero-tolerance policies through clear disciplinary measures for perpetrators, while continually monitoring and reviewing policy effectiveness to adapt to emerging challenges.

## 2.0 Definitions

For the purposes of this policy, the following terms have the definitions provided below:

### 2.1. Sexual Harassment:

Sexual harassment, as described in this policy, refers to any unwelcome or inappropriate behaviour of a sexual nature directed at someone. It includes actions that offend, discomfort, or humiliate the person affected, or create a hostile and intimidating environment in the workplace, classroom, or learning space. Such behaviour violates the individual's rights and dignity. For avoidance of doubt, these can happen when:

- i. *Submission to such conduct is made explicitly or implicitly a term or condition of employment or academic success.*
- ii. *Submission to or rejection of such conduct is used as a basis for academic or employment decisions.*
- iii. *Such conduct creates an intimidating, hostile, or offensive environment.*

### 2.2. Examples of Sexual Harassment: *include but not limited to;*

Inappropriate or unwelcome touching; sexually explicit jokes, comments, or gestures; displaying sexually suggestive materials; cyber harassment, including sending sexually explicit messages or images, stalking, unwanted or unnecessary physical contact including touching, repeated verbal or sexual advances, sexually suggestive approaches, indecent exposure directed at a person or persons, receipt, displays and dissemination of suggestive or sexually explicit photographs, objects and other electronic images in traditional or new media, persistent staring at a person's body, compromising invitations and/or presents, requests or demands for sexual favours, sexually derogatory statements or sexually discriminatory remarks made by a student, staff member or an independent contractor, in respect of another member of the University.

**2.3. Misconduct:** unacceptable or improper behaviour, especially by an employee, a student or independent contractor.

**2.4. Alleged Incident:** any reported occurrence of sexual harassment, prior to any investigations and review.

**2.5. Hostile Environment:** A situation where harassment is so severe, pervasive, or objectively offensive that it denies an individual equal access to the university's programmes, activities, or employment.

**2.6. Consent:** A clear, unambiguous, and voluntary agreement between all participants to engage in specific activities. Consent cannot be obtained through force, coercion, manipulation, or while an individual is incapacitated.

**2.7. Retaliation:** Any adverse action taken against a person for reporting harassment, assisting in a complaint, or participating in an investigation. Examples include threats, demotion, exclusion from activities, or other forms of intimidation.

**2.8. Quid Pro Quo Harassment:** A situation where submission to sexual advances or requests for favours is made a condition for academic, professional, or other benefits.

**2.9. Complainant:** complainant is categorized into three for the purpose of this policy:

*(a) Alleged Victim:* the person(s) who lodge a formal complaint under this Policy, or person(s) who allegedly suffered acts of sexual harassment as defined in this Policy.

*(b) Witness(es)/Reporter:* person(s) who have witnessed and/or received information on violations of this policy formally reports same to the university or all employees of the university are required to report any alleged incidents of sexual harassment.

*(c) Designated Officers:* person(s) designated by the institution to serve as complainants on behalf of uncooperative person(s) who have allegedly suffered acts of sexual harassment as defined in the policy.

**2.10. Independent Parties:** Individuals who are not employees of UniMAC but occasionally interact with the University. These may include external stakeholders or affiliates who have regular, temporary, or occasional engagements with the institution.

**2.11. Interim Protection:** Temporary measures implemented by the Anti-Sexual Harassment Committee (ASHCom) in response to an alleged incident of sexual harassment. These actions are intended to safeguard the safety and well-being of those involved while the case is under review.

**2.12. Formal Complaint:** A written document, signed and dated, submitted to the Anti-Sexual Harassment Committee (ASHCom) or the designated officer of the university, detailing an alleged incident of sexual harassment. This report formally initiates the investigation process.

**2.13. Independent Contractor:** An individual or third-party organisation engaged by UniMAC to provide specific services on a temporary or periodic basis. This includes, but is not limited to, contractors, part-time lecturers, part-time administrators, utility staff, guests, national service personnel, and interns.

**2.14. Facilitator:** Designated officers or individuals appointed by the Anti-Sexual Harassment Committee (ASHCom) to receive both formal and informal complaints of sexual harassment within the institution. These facilitators are responsible for notifying the Committee of any complaints they receive. They may also include individuals in positions of responsibility, such as Deans, Heads of Departments (HOD), the Registrar, or Counsellors, whom students may approach with concerns.

**2.15. Respondent:** The individual(s) identified in a formal complaint under this policy as the alleged perpetrator(s) of behavior that is deemed to violate UniMAC's Sexual Harassment Policy.

**2.16 Academic Accommodation** involves adjustments or modifications to a student's learning environment or assessment methods to support students, victims, or witnesses in cases of sexual harassment. These accommodations ensure full participation in coursework without lowering academic standards. Examples include extended exam time, alternative testing formats, and other necessary adjustments.

### **3.0 Policy Provisions**

#### **3.1 Zero-Tolerance Policy**

UniMAC enforces a zero-tolerance approach to sexual harassment. Any violation shall be met with prompt and appropriate disciplinary actions, which may include expulsion, dismissal, or legal consequences.

#### **3.2 Protection Against Retaliation**

Retaliation against individuals who report harassment, provide evidence, or participate in investigations is strictly prohibited. Any such acts shall be treated as independent violations of this policy.

### **3.3 Confidentiality**

Reports and investigations shall be handled with the utmost confidentiality to protect the privacy and dignity of all parties involved. Information shall only be disclosed on a need-to-know basis.

### **4.0 Reporting Procedures**

At UniMAC, creating a safe and supportive environment is a priority. Reporting incidents of sexual harassment is an essential step in addressing and preventing such behavior. The university has established clear and accessible procedures to ensure that all members of the community feel empowered to report incidents with confidence and receive the necessary support. The University shall offer multiple reporting channels to accommodate the diverse needs and preferences of individuals who wish to report sexual harassment. Each channel shall be designed to provide ease of access and maintain confidentiality to the greatest extent possible:

- i. Online Reporting Portal:** UniMAC shall ensure official harassment reporting portal that provides a secure, user-friendly platform for submitting complaints. This digital channel allows individuals to file detailed reports at any time, ensuring accessibility and convenience. The portal includes guidance on completing reports and information on next steps following submission.
- ii. The Harassment Prevention Office (HPO):** The Harassment Prevention Office under ASHcom shall serve as a central point for addressing issues related to sexual harassment. The office shall be accessible both in-person and remotely through a dedicated phone line and email address. Trained professionals shall be available during working hours to provide assistance, answer questions, and guide complainants through the reporting process.
- iii. Anonymous Reporting Mechanisms:** UniMAC recognizes that some individuals may feel hesitant to disclose their identity when reporting incidents. To address this concern, the university shall implement anonymous reporting options which ensure that individuals can share critical information without revealing personal details. These reports shall be treated with the same level of seriousness and care as those made through other channels.
- iv. Supervisors and Faculty Advisors:** Faculty advisors and immediate supervisors play a crucial role in supporting victims of sexual harassment. These individuals shall be trained to respond sensitively to disclosures and to connect complainants with appropriate resources. This option is especially valuable for those who prefer direct interpersonal communication.

## **4.2 Timeline for Reporting**

While UniMAC does not impose a strict time limit for reporting incidents of sexual harassment, complainants are strongly encouraged to file reports promptly. Early reporting not only allows for a more thorough and efficient investigation but also helps address the situation swiftly, reducing the potential for further harm. However, the university remains committed to addressing complaints regardless of when they are reported, ensuring that justice and resolution are not constrained by time.

## **4.3 Support for Complainants**

UniMAC is deeply committed to providing comprehensive support for individuals who come forward to report sexual harassment. The university recognises the emotional, academic, and professional impact such incidents can have and offers a wide range of resources to assist complainants throughout the reporting and investigation process:

- i. **Counseling Services:** Professional counseling services shall be available to help complainants process their experiences and manage the emotional effects of sexual harassment. These services are confidential and can be accessed at no cost to the individual.
- ii. **Academic Accommodations:** To ensure that victims do not face academic disadvantages, where necessary, UniMAC shall offer accommodations such as extensions on assignments, adjustments to class schedules, or alternative examination arrangements for victims of sexual harassments.
- iii. **Additional Resources:** The university shall provide guidance on accessing external support services, including legal advice and advocacy groups. UniMAC also ensures that complainants are informed about their rights and options at every stage of the process.

## **5.0 Policy Implementation and Oversight**

### **5.1 Establishment of Oversight Body**

The University's commitment to fostering a safe and respectful environment for work, teaching, and learning shall be realized through the establishment of the Anti-Sexual Harassment Committee (ASHcom). This committee shall hold the overarching responsibility of ensuring the prevention and redress of sexual harassment across the institutions and implementation of this policy in the University.

## **5.2. Composition of ASHcom**

### **5.2.1 Composition of ASHcom student Cases**

5.2.1 To effectively uphold this mandate, ASHcom shall consist of five members, whose roles and expertise reflect a balanced representation of the university's community. The membership structure is outlined as follows:

- i. **Chairperson** – A senior member of staff, holding a rank not lower than that of a Senior Lecturer or its equivalent.
- ii. **Academic Board Representative** – A member appointed to represent the institution's academic leadership.
- iii. **Human Resource Officer** – Serves as both a member and the secretary of the committee.
- iv. **Union Representative** – A delegate representing relevant unions, where applicable.
- v. **Student Representative Council** – A voice for the student body, included where applicable.

### **5.2.2 Composition of the ASHCom Committee for Non-Student Cases**

In situations where neither the complainant nor the respondent is a student, the Anti-Sexual Harassment Committee (ASHCom) shall comprise four members, specifically:

- i. **Chairperson** – Responsible for steering the committee's deliberations and ensuring impartiality and adherence to policy.
- ii. **Academic Board Representative** – Provides an academic perspective and upholds institutional standards during proceedings.
- iii. **Human Resource Officer (Member/Secretary)** – Handles administrative responsibilities, maintains records, and ensures procedural compliance.
- iv. **Union Representative** – Represents the interests of the parties involved, ensuring fairness and objectivity in the committee's considerations.
- v. In all its sittings, the **Director of Legal affairs** of UniMAC shall be in attendance to provide guidance and advice where necessary.

### **5.2.3 Gender Representation in Leadership**

In the appointment of the Chairperson and the Management Representative, the Vice Chancellor shall ensure that at least one of the two appointees is a woman. This provision underscores UniMAC's commitment to promoting gender equity and ensuring diverse perspectives in decision-making processes.

### **5.3 Appointment and Confirmation of ASHCom Members**

The appointment and confirmation of ASHCom members are guided by institutional processes to ensure that the committee represents its respective campus constituencies. These procedures include:

#### **5.3.1 Term of Office**

##### **1. General Membership Term:**

- i. Members shall serve a term of two (2) years, which is renewable for an additional two (2) years based on performance and institutional needs.

##### **2. Chairperson Appointment:**

- i. The Chairperson shall be appointed for an initial term of two (2) years, renewable for a further two (2) years.

##### **3. Student Association Representative:**

- i. The Student Association Representative shall automatically assume membership upon taking office in the student association.

##### **4. Union Representative:**

- i. Represents the relevant union constituency, ensuring impartiality and equity for all parties involved.

#### **5.3.2 Expiry of Confirmed Membership**

Membership tenure linked to institutional roles shall cease automatically upon the conclusion of those roles. Specifically:

- i. Officers appointed or confirmed as ASHCom members due to their official positions within the institution shall no longer serve on the committee once they vacate those positions.
- ii. Members appointed for fixed terms (e.g., two years) may be considered for reappointment for a subsequent two-year term based on their contributions and institutional needs.

### **5.4 Responsibilities of the Anti-Sexual Harassment Committee (ASHCom)**

The Anti-Sexual Harassment Committee (ASHCom) at the University of Media, Arts, and Communication (UniMAC) shall be entrusted with critical responsibilities to ensure a safe,

respectful, and harassment-free environment for all members of the university community. Below are the detailed responsibilities:

#### **5.4.1. Policy Administration and Awareness**

ASHCom shall be responsible for the comprehensive administration of the Sexual Harassment and Misconduct Policy. This includes ensuring that the policy is effectively disseminated across all levels of UniMAC, ensuring that every student, staff member, and faculty is aware of the provisions, processes, and protections outlined in the policy. ASHCom shall utilize various communication channels—workshops, digital platforms, and printed materials—to create widespread awareness and understanding.

#### **5.4.2. Appointment and Oversight of Reporting Officers**

ASHCom shall appoint Institutional Reporting Officers (IROs) in the three institutions (IJ, IFT & IL) tasked with receiving complaints of sexual harassment. Beyond appointment, ASHCom shall manage and support these officers to ensure that they are well-trained, empathetic, and responsive to complaints. This oversight includes providing ongoing guidance, tools, and resources to handle sensitive cases effectively while maintaining confidentiality and professionalism.

#### **5.4.3. Complaint Reception**

ASHCom is the designated body to receive all complaints of alleged sexual harassment, whether formal or informal. These complaints may be submitted directly through the IROs. The committee must ensure that every complaint, regardless of its formality, is acknowledged, documented, and handled with care, providing initial support to complainants and initiating the appropriate processes for resolution.

#### **5.4.4. Investigation and Documentation**

For formal complaints of sexual harassment, ASHCom shall conduct thorough investigations to uncover the facts and circumstances surrounding each case. This involves gathering evidence, interviewing relevant parties, and maintaining meticulous documentation of the investigation process. The committee shall ensure impartiality and fairness to safeguard the rights and dignity of all involved.

#### **5.4.5. Implementation of Interim Protective Measures**

ASHCom shall take timely and appropriate interim protective measures to ensure the safety and well-being of all parties involved in a complaint. These measures may include adjustments to work or academic arrangements, no-contact directives, or other actions designed to prevent further harm while the investigation is ongoing.

#### **5.4.6. Recommendations for Sanctions**

After the conclusion of investigations, ASHCom shall make informed recommendations on appropriate sanctions or corrective actions for the parties involved in substantiated complaints. These recommendations shall be based on the severity of the misconduct, the evidence presented, and the impact on the complainant and university community, ensuring accountability and fairness. The sanctions to be applicable as provided in 15.0 of this policy.

#### **5.4.7. Reporting Outcomes and Trends**

ASHCom shall be responsible for reporting the outcomes of individual investigations to the VC in a timely manner. In addition to case-specific reporting, the committee shall prepare an annual report detailing trends, patterns, and systemic issues identified in sexual harassment complaints. This report shall include recommendations for policy updates and preventive strategies to enhance the institution's safety culture.

#### **5.4.8. Policy Compliance Supervision**

To ensure consistency and accountability, ASHCom shall monitor and supervise adherence to the Sexual Harassment and Misconduct Policy across all units of UniMAC. This involves periodic reviews of processes, ensuring that all departments align with the policy's provisions, and addressing lapses promptly.

#### **5.4.9. Proactive Education and Training**

ASHCom shall be responsible for organising regular training sessions, workshops, and educational programmes aimed at fostering a harassment-free culture. These initiatives will target students, staff, and faculty to promote awareness, empower individuals to recognize and challenge inappropriate behaviours, and strengthen the collective understanding of sexual harassment and its consequences.

### **6.0 Capacity Building and Orientation**

The University of Media, Arts, and Communication (UniMAC) recognises the paramount importance of addressing sexual harassment and misconduct with urgency and diligence. To uphold these values and ensure that all individuals in positions of responsibility are well-equipped to prevent, manage, and report such incidents, the following measures shall be implemented:

### **6.1 Comprehensive Orientation for Committee Appointees**

All individuals appointed to the Sexual Harassment Committee shall undergo a detailed orientation programme before assuming their respective roles. This programme shall aim to:

- i. Equip committee members with a thorough understanding of their roles and responsibilities.
- ii. Provide clear guidance on the procedures for addressing complaints, ensuring fairness and confidentiality.
- iii. Highlight the impact of sexual harassment on individuals and the institution, fostering a sense of urgency in their duties. Through this orientation, committee appointees will gain the skills and knowledge required to handle cases effectively and empathetically.

### **6.2 Orientation for Institutional Leaders**

Recognising the critical role of leadership in shaping a harassment-free environment, all persons appointed to key positions within the University, including VC, Pro VC, Registrars Rectors, Directors, Deans, Heads of Departments (HODs), and similar roles, will receive specialised orientation. This training will focus on:

- i. Raising awareness of the severity of sexual harassment and misconduct issues.
- ii. Establishing a proactive approach to fostering a safe and respectful institutional culture.
- iii. Emphasising the responsibility of leaders to model ethical behaviour, ensure accountability, and promptly address concerns brought to their attention.

### **6.3 Training for Facilitators**

Individuals designated as Facilitators in matters relating to sexual harassment prevention and resolution shall undergo targeted training as highlighted in 16.0. This training shall:

- i. Provide practical tools for recognising, preventing, and intervening in incidents of harassment.
- ii. Ensure Facilitators are proficient in supporting affected individuals with sensitivity and professionalism.
- iii. Place emphasis on adherence to institutional policies and national legal frameworks to ensure compliance and justice. The goal is to enable Facilitators to

act as effective intermediaries, fostering trust and promoting a safe and inclusive environment for all members of the university community.

## **7.0 Facilitators**

### **7.1 Role of Facilitators**

Facilitators act as the primary official representatives for addressing any reported incidents of sexual harassment. They are the initial link between the affected individuals and the institution's response mechanisms, ensuring timely and appropriate actions are taken in accordance with established policies and procedures.

### **7.2 Composition of Facilitators**

The Facilitators' team is composed of key institutional stakeholders, including:

- i. Directors and Deans across the various faculties and departments.
- ii. Heads of Departments (HODs).
- iii. The Head of Campus Security.
- iv. The Women's Commissioner of the Student Representative Council (SRC).

### **7.3 Appointment of Facilitators**

Upon assumption of their designated roles, Facilitators appointed to serve within the Anti-Sexual Harassment Committee (ASHCom) are entrusted with a pivotal and sensitive responsibility. The appointment affirms the confidential nature of their duties, thus requires a steadfast commitment to integrity, impartiality, and respect for all parties involved in the resolution process.

### **7.4 Responsibilities of Facilitators**

Facilitators play a critical role in upholding the effectiveness of the Sexual Harassment Policy. Their key responsibilities include:

#### **7.4.1 Policy Administration**

- Collaborating with ASHCom to ensure the seamless administration and implementation of the Sexual Harassment Policy in alignment with its established guidelines.

#### **7.4.2 Guidance for Complainants**

- Providing clear and empathetic explanations to complainants regarding the available pathways for addressing complaints, including both formal and informal procedures.

### **7.4.3 Support in Informal Resolutions**

- Assisting complainants in initiating informal complaint processes by facilitating discussions, including engagement with the Respondent, in a supportive and non-confrontational manner.

### **7.4.4 Escalation of Formal Complaints**

- Ensuring all formal complaints are promptly documented and referred to ASHCom for thorough review and resolution, maintaining a standard of diligence and confidentiality throughout.

### **7.5. Failure to Act on a Sexual Harassment Complaint**

- i. In the event that a Facilitator fails to take appropriate action upon receiving a sexual harassment complaint, this will be considered a breach of duty. The individual will be subject to review by the ASHCom (Anti-Sexual Harassment Committee) and may be required to address the matter in accordance with the University's policies.
- ii. A Facilitator is required to forward any received complaint or report to the appropriate authorities within 48 hours to ensure timely and effective handling of the issue.

## **8.0 Complaints Procedure**

- i. Facilitators are not authorised to handle complaints informally when the matter involves a Senior Member and a student.
- ii. In cases involving a Senior Member and a student, the Facilitator must promptly report the complaint in writing to the Chairperson of the Anti-Sexual Harassment Committee or the Dean of Students.

All individuals involved in a sexual harassment complaint must follow this procedure to seek resolution:

### **8.1 Informal Approach**

The informal approach is a process aimed at resolving sexual harassment complaints through assisted negotiation, where the individual alleging harassment (the complainant) and the accused (the respondent) engage in a mediated conversation. This process is confidential and focuses on advice, mediation, conciliation, and counseling for both parties.

- 8.1.1 Upon receiving the complaint, the Facilitator may, at their discretion, encourage the complainant or their representative to pursue an informal resolution. However, participation in this process is voluntary.

- 8.1.2 The complainant or their representative will be asked to confirm their agreement to proceed with an informal complaint.
- 8.1.3 If the informal approach is chosen, the Facilitator shall facilitate a dialogue between the complainant (or their representative) and the respondent, ensuring the complaint is presented clearly and respectfully.
- 8.1.4 If the complainant is satisfied with the outcome of the informal process, the matter will be considered resolved, and no formal documentation will be necessary.
- 8.1.5 The Facilitator shall inform the Chairperson of the Anti-Sexual Harassment Committee in writing, detailing the case, the actions taken, and confirming that the issue has been resolved.
- 8.1.6 Following the submission of the complaint, the Facilitator must respond to the complainant within 48 hours, providing an update on the progress of the situation.
- 8.1.7 Where a Facilitator refuses to act on a reported case, ASHCom shall invite the Facilitator to appear before same to explain the inaction. ASHCom shall make appropriate recommendations to the Vice Chancellor for consideration

## **8.2. Formal Approach**

This section outlines the formal procedure for reporting an alleged case of sexual harassment, ensuring that the matter is appropriately addressed by the ASHCom.

- 8.2.1 The complainant, or their designated representative, must submit a formal written complaint to the Chair of the ASHCom through a Facilitator as soon as possible, preferably within 48 hours of the alleged sexual harassment incident.
- 8.2.2 In instances involving rape or assault, the complaint should be reported immediately to the Police. The ASHCom will then collaborate with the Police to conduct a thorough investigation and determine the appropriate course of action internally.
- 8.2.3 The ASHCom shall review the complaint to assess whether it meets the criteria of sexual harassment as outlined in this policy.
- 8.2.4 In determining whether the complaint constitutes sexual harassment, the committee shall apply the definition of sexual harassment as defined in this policy.
- 8.2.5 In the event that either the complainant or the respondent is dissatisfied with the outcome of the investigation or the action taken, they have the right to appeal to the VC. The appeal must be submitted within seven (7) days of receiving the written decision from the Committee.
- 8.2.6 Upon receiving the appeal, the VC shall review the case and issue a decision within twenty-one (21) working days. The VC may request any additional information deemed necessary to facilitate a fair and informed decision.

- 8.2.7 Should either the complainant or respondent remain dissatisfied with the VC's decision, they may appeal to the Governing Council of the University. This appeal must be submitted within fourteen (14) days of the VC's decision.
- 8.2.8 The Governing Council of the University shall review the case at its discretion and may take any actions it deems appropriate. The decision of the Governing Council, in line with the Anti-Sexual Harassment Policy Procedures, shall be final and binding on both the complainant and the respondent internally.
- 8.2.9 If a member of the ASHCom becomes the subject of an investigation or has a direct relationship with the complainant or respondent, they must recuse themselves from the proceedings. If a member is found to be the alleged perpetrator, they shall be subject to investigation and appropriate disciplinary action.
- 8.2.10 In cases involving Senior Members, student members of the ASHCom shall be excluded from the investigation to ensure impartiality.

## **9.0. Prohibited Conduct During Investigations**

To ensure a fair and impartial process for addressing and investigating allegations of sexual harassment, the following conduct is strictly prohibited during the investigation of any reported incident. Any breach of these provisions shall be regarded as misconduct and may result in disciplinary action:

### **9.1. Retaliation**

Any form of retaliation, whether direct or indirect, against any party involved in the investigation, including complainants, respondents, witnesses, or others engaged in the investigative process, is prohibited. This includes, but is not limited to, intimidation, threats, coercion, or any form of adverse action related to employment, academic standing, or personal circumstances.

### **9.2. Breach of Privacy**

Any act that violates the confidentiality of individuals involved in the investigation of a sexual harassment incident is prohibited. This includes the unauthorized disclosure of sensitive information related to the incident or investigation, in violation of the privacy rights of the parties involved. As such, all parties involved would be required to sign a Non-Disclosure Agreement (NDA) prepared by ASHCom. Violations of such agreements would attract severe sanctions as provided for in 15.0 of this policy.

### **9.3. Violation of Interim Protection Measures**

Any act that contravenes interim protection measures put in place to ensure the safety and well-being of individuals involved in the investigation is prohibited. These measures

are designed to protect individuals from harm or retaliation during the course of the investigation.

#### **9.4. Falsification of Evidence**

Falsifying or attempting to falsify evidence or making a false report with malicious intent or in bad faith, is strictly prohibited. Individuals found to have engaged in such conduct may face severe disciplinary consequences (as provided for in 15.0) for undermining the integrity of the investigation process.

### **10.0 CONSENSUAL RELATIONSHIPS**

#### **10.1 Staff-Student Relationships**

There shall be no intimate or romantic relationship between any staff member or independent contractor and a student, regardless of whether such a relationship is consensual. This policy is in place to ensure that power imbalances and potential conflicts of interest are avoided, protecting both the integrity of the educational environment and the well-being of students.

#### **10.2 Supervisor-Subordinate Relationships**

Intimate relationships between a supervisor and their subordinate is discouraged. Even if such relationships are consensual, they create inherent power imbalances that may compromise professional boundaries, affect workplace dynamics, and lead to perceptions of favoritism or conflicts of interest. The University reserves the right to take necessary actions to address such situations and ensure a fair, respectful, and professional working environment.

#### **10.3 Student-Student Relationships**

Consensual relationships between students are not prohibited. However, any such relationships may be subject to the terms of this policy if a complaint arises regarding harassment, discrimination, or other violations. All parties are expected to maintain respect and professionalism in their interactions with one another, ensuring that such relationships do not negatively affect the academic environment or lead to inappropriate behaviour.

#### **10.4 Staff-Staff Relationships**

Consensual relationships between staff members of equal status are not prohibited, but these relationships must comply with the broader intent of this Policy. Should any violations of this policy occur within the context of such relationships, appropriate actions will be taken to maintain a professional and respectful workplace. The University encourages staff to exercise discretion and maintain transparency in their professional

interactions to prevent conflicts of interest and ensure a harmonious working environment.

### **11.0. Contacting the Police**

This Anti-Sexual Harassment Policy and Procedures shall not infringe upon the right of the Complainant to contact law enforcement authorities at any time for protection. In cases where criminal offenses such as rape, assault, or any other form of sexual violence are alleged, the Complainant is encouraged to report the matter directly to the police. This ensures that the individual's safety and legal rights are prioritised, and appropriate legal action can be taken in accordance with the law.

### **12.0. Privacy and Confidentiality**

UniMAC is dedicated to upholding the privacy and confidentiality of all individuals involved in incidents reported under this policy. It recognises the importance of maintaining the dignity and respect of all parties during the investigative process. To the extent possible and in line with the need to thoroughly assess allegations, the University shall make every reasonable effort to protect the privacy interests of all individuals involved. This commitment extends to safeguarding the identities of both the Complainant and the Respondent, ensuring that any information disclosed is handled in a manner that respects confidentiality while balancing the need for appropriate actions to address the situation and prevent further misconduct.

### **13.0. Interim Measures**

Upon receipt of a complaint of alleged sexual harassment, the Anti-Sexual Harassment Committee may, at its discretion, implement interim measures to protect the individuals involved while the investigation is ongoing. These measures may include, but are not limited to:

- i. Issuance of a 'No Contact Order' to prevent further interaction between the parties involved.
- ii. Provision of immediate access to medical care or counseling services to support the Complainant.
- iii. Relocation of the victim to a different lecture group or environment to ensure their safety and well-being in cases where the harassment occurred in an academic setting.

- iv. Reassigning the marking of the victim's scripts to another individual, ensuring there is no direct involvement of the Respondent in the victim's academic evaluation.

#### **14.0. MISCONDUCT**

Any individual involved in an incident of sexual harassment who deliberately falsifies evidence, attempts to manipulate the facts, or submits a false report with malicious intent or in bad faith, shall face serious disciplinary consequences. These consequences may include, but are not limited to, suspension, termination of employment, or expulsion from the University, as appropriate. The University is committed to maintaining a fair and just process for all parties involved, and any actions that undermine the integrity of this process will not be tolerated.

#### **15.0. SANCTIONS**

Individuals, including staff members, independent contractors, guests, and students, who are found to have violated the terms of this policy will be subject to disciplinary action. The severity of the sanctions will be determined based on the nature and seriousness of the violation and may include, but are not limited to, the following:

- a. Issuance of written warnings.
- b. Requirement to issue a written apology to the affected individual(s).
- c. Suspension from duties or academic activities for a specified period.
- d. Dismissal from the University, including termination of employment or expulsion.

#### **16.0 Preventive Measures**

##### **16.1 Training and Awareness**

**Mandatory Training:** All members of the university community, including students, faculty, and staff, are required to participate in annual anti-harassment training sessions. These sessions are designed to ensure that all individuals are fully informed about the university's sexual harassment policy, their rights, and their responsibilities in maintaining a safe and respectful environment.

**Orientation Programs:** As part of the onboarding process, all new students, faculty, and staff will receive comprehensive training on sexual harassment prevention. This training will be included in their induction to ensure they understand the university's

commitment to creating a respectful and inclusive environment from the outset of their affiliation with UniMAC.

### **16.2 Public Awareness Campaigns**

To promote a culture of respect and awareness, the university will implement ongoing public awareness campaigns. These will include posters, flyers, and digital materials displayed across campus and shared via online platforms. The materials will provide clear information about the university's sexual harassment policy, reporting procedures, and available support services. These campaigns are designed to ensure that all members of the community are informed of their rights and the resources available to them should they need assistance.

### **16.3 Safe Spaces and Peer Support Networks**

The university is committed to providing supportive environments for individuals who may experience sexual harassment. To this end, dedicated safe spaces shall be established, where individuals can seek privacy, comfort, and guidance. In addition, trained peer support networks shall be created to offer confidential advice, emotional support, and assistance in navigating the reporting process. These networks shall be available to all members of the university community, ensuring that those affected by harassment have access to compassionate and understanding peers who can provide assistance and advocacy.

### **17.0. Policy Review**

This Sexual Harassment Policy shall undergo a comprehensive review every five (5) years to ensure its relevance, effectiveness, and alignment with current legal standards and best practices. The review process shall be conducted under the oversight of the Vice Chancellor, in consultation with relevant stakeholders, including legal advisors and relevant university bodies. Should any significant legal or policy changes occur during the review period, an interim review may be conducted to address such developments. Any amendments or updates resulting from the review shall be communicated to all members of the university community to ensure ongoing compliance and awareness.



**PUBLISHED BY AUTHORITY**

**No. 5 Alboran Street  
South Legon (GA-194-3855)  
Postal Office Box GP 667, Accra**