ST. JOSEPH’S COLLEGE OF EDUCATION, BECHEM

Sexual Harassment Policy

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PURPOSE OF POLICY

The St. Joseph’s College of Education is committed to equal opportunities for all manner of persons within its community. This means that all individuals working, teaching and studying at the College are treated fairly and impartially, regardless of sex, age, ethnicity, physical/mental abilities, religion or creed.

St. Joseph’s, within this framework, therefore considers the incidence of sexual harassment a problem that requires utmost attention and resolution of the College community. It is noted that the act of sexual harassment poses challenges to the integrity of the society and any academic institution because it focuses on the recipient’s sexuality instead of one’s talents, intellect and abilities. St. Joseph’s is resolved to do all it can within the scope of the Colleges’s Statutes to provide the necessary environment to address potential occurrences of sexual harassment and utilize all fair and appropriate procedures to resolve such incidences. It is envisaged that the actors of any sexual harassment event shall be given the necessary platform devoid of interference to enhance the amicable resolution of the problem.

This Sexual Harassment Policy is envisaged to govern the College’s response in the event of a complaint of sexual harassment. The Policy document presented herewith, shall apply to all stakeholders of the College Community.
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CHAPTER ONE- INTRODUCTION

1.1 Background of Policy

Sexual harassment is unlawful and distasteful. Sexual harassment violates the rights of self-determination and bodily integrity of the affected person(s). It creates fear and anxiety with immediate and lasting effects on the affected. The effects of sexual harassment could be personal and social. The St. Joseph’s College of Education as an institution committed to promoting equity and safety has embarked on the development of a Sexual Harassment Policy for the purposes of promoting the welfare and progression of all staff and students. It is committed to the creation of an environment that is conducive to work and study, where all members of the College community; including staff, students and third parties, irrespective of their sex, age, ethnicity, physical or mental ability, sexual orientation, religion or creed, are free from any form of harassment especially sexual harassment. By this policy, St. Joseph’s seeks to provide an enabling environment that is safe for all actors and members of the College community, residential or non-residential.

1.2 Objectives of the Policy

The main objectives of the Policy are to:

1. Identify what constitutes sexual harassment in the college.
2. Prevent sexual harassment and misconduct occurrence in any form through education and awareness creation.
3. Investigate allegations and reports of incidents of sexual harassment and sexual misconduct in the College.
4. Administer appropriate disciplinary measures when a violation is found to have occurred as provided by this Policy and as such deter potential sexual harassment and misconduct offenders.
5. Ensure that victims of sexual harassment and sexual misconduct or anyone who participates in the investigation does not face victimisation, retaliation or stigmatisation.
6. Ensure the right reporting system is in place to encourage victims of sexual harassment to seek redress without fear of reprisal.

1.3 Scope of the Policy
St. Joseph’s CoE does not tolerate sexual harassment in any form. Every staff, student and other stakeholders have a responsibility to ensure that sexual harassment does not occur. Anyone found to have sexually harassed another person will be subject to disciplinary action that may include an apology, transfer of duties or dismissal. Reports of sexual harassment will be treated promptly, seriously and confidentially. Complainants have the right to determine how a complaint will be treated. They also have the right to have a supporter or representative chosen by them involved in the process and the option to stop the process at any time; although the College might decide to proceed with the case. The alleged harasser also has the right to have a supporter or representative chosen by him/her present when he/she responds to the allegations made. No student, staff or
other stakeholder will be treated unfairly as a result of making a complaint of sexual harassment. Immediate disciplinary action will be taken against anyone who victimizes or retaliates or stigmatizes against someone who has made a complaint of sexual harassment. The St. Joseph’s CoE will afford natural justice to any person involved in a dispute.

**This Policy applies to:**

- All Staff: Senior Members, Senior Staff and Junior Staff.
- Students: Undergraduates and Graduates.
- Teaching Practice Mentors and Staff
- Other Stakeholders: all other workers within the College community.
CHAPTER TWO

2.0. POLICY PRINCIPLES

In alignment with the St. Joseph’s Gender Policy (2015), St. Joseph’s Sexual Harassment Policy (2015), Teaching and Learning Policy (2015) and the National Council for Tertiary Education (NCTE) Sexual harassment Policy (2017) for the college, the following principles guide this policy:

- **Mutual co-existence**: Ghanaian men and women will co-exist peacefully, respectfully and improve gender relations.

- **Non-discrimination**: as enshrined in the 1992 constitution of Ghana, neither Ghanaian men nor women will 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 will be dealt with fairly and promptly and in a confidential manner.
For purposes of this policy, consent is defined as freely and affirmatively communicated willingness to participate in particular activity or behaviour, expressed either by words or clear unambiguous actions.

1. It is the responsibility of the person who wants to engage in sexual activity to ensure that consent is obtained from the other person to engage in the activity.

2. Lack of protest or resistance does not mean consent. For that reason, relying solely on non-verbal communication can lead to misunderstanding and harassment may have been initiated by this.

3. Consent must be present throughout any form of sexual activity – at any time, a participant can communicate a desire to no longer consent to continuing the activity.

4. Consent to one form of sexual activity does not imply consent to other forms of sexual activity.

5. Consent is not procured by the use of physical force, compelling threats, intimidating behaviour or coercion.

2.0.3. SUPPORTING PROCEDURES

The Government of Ghana has passed a National Legislation (Labour Act 2003; Section 103, Ghana Criminal Code, 1960 (Act 29), Ghana Domestic Violence Act, 2007, ACT 732) and has ratified various national and international conventions that seek to promote gender equity and reduce gender based violence.
CHAPTER THREE- DEFINITIONS AND TYPES

3.1.0. Definition

Sexual harassment is treatment that involves unwanted sexual advances, requests and other verbal or physical conduct of a sexual nature. Unwanted is a critical word because a victim may consent to certain conduct not because they want to, but because they feel pressured to do so. Sexual harassment can occur regardless of whether the harasser considers the behaviour to be offensive or not. In educational settings, harassers can be a teacher/tutor, a fellow student, a colleague, a manager, a teaching practice (TP) mentor or a member of the community. Unwanted sexual behaviour can have serious negative effects on victims, thus sexual harassment can have serious negative effects on the teaching and learning process as well.

Sexual harassment therefore includes, but is not limited to the following:

i. Verbal, physical, written, digital or pictorial communication relating to gender or sex which has the purpose or effect of unreasonable interference with an individual’s academic or work performance which creates a hostile, offensive, or intimidating atmosphere for the recipients.

ii. Unwelcome and irrelevant comments, references, gestures or other forms of personal attention which are inappropriate to the academic, employment or residential setting, for example, the classroom, hostel or office, and which may reasonably be perceived as sexual overtures or denigration.
iii. 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.

iv. Sexual imposition, that is, non-consensual touching or any other behaviour that may be considered as sexual which is not consensual.

v. Abuses of power relations such that individuals receive unfair treatment based on gender or sexuality.

vi. Threat or coercion of sexual relations; sexual contact which is not freely agreed to by both parties.

vii. Confining, sedating, luring, striping, posing and any pretentious or forceful means used to take advantage of anyone sexually.

viii. Rape

It will be understood that many of the above terms are subject to interpretation. While overt forms of sexual harassment shall usually be obvious, more subtle forms may be difficult to recognize. Perpetrators may not realize that their behaviour is “unwelcome” or inappropriate. Conduct which leads to the harassment of another person is not acceptable and shall render the individual responsible liable to disciplinary action.

There three main forms of sexual harassment: Hostile Environment, Quid Pro Quo and Retaliation.
3.1.1. 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 cases, the perpetrator can be anyone - a superior, a fellow student, a fellow colleague, a TP mentor, a community member.

<table>
<thead>
<tr>
<th>Hostile environment examples:</th>
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<tbody>
<tr>
<td>1. Unnecessary and unwanted nicknames such as, ‘sweetie’, ‘baby’, ‘girlfriend’</td>
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</table>
10. 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

11. Actual or attempted rape or sexual assault

### 3.1.2. 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 student is made to believe that her grade is dependent on whether she goes on a date with her teacher, 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.

### Quid pro quo examples:

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

1. Direct or indirect promises of academic benefits (such as high grades, letters of recommendation, participation in an activity), in return for sexual favours

2. Direct or indirect promises of work benefits (such as job offering, promotion, housing, allowances, letters of recommendation, good appraisals), in return for sexual favours

3.1.3. 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.

Retaliation examples:

| 1. 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 |
| 2. 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 |
Retaliation examples:

1. 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.

2. 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:

1) 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.

2) A tutor with relevant subject knowledge will be given the marking criteria for the assignment and mark the 8-10 anonymised scripts.

3) 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.
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 will first, where possible, make it clear to the harasser that the behaviour is unwelcome, that it is offensive and that it will 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 Teaching Practice (TP) mentor/head teacher/teacher, or a community member. An informal report may resolve problems quickly and in many cases, will 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 will be taken to institute an informal reporting system for sexual harassment:

1. St. Joseph’s CoE shall appoint two ‘Safe Space’ focal people—the institution will appoint a female and male member of staff as Safe Space focal people, who will act as the first point of contact for informal reporting. These focal people could be the Gender Champion and a member of the Gender Committee. All students and staff will be made aware that these focal people aim to provide support and a safe space to informally report cases of sexual harassment.

2. The policy shall ensure confidentiality and sensitivity - The Safe Space focal people will ensure confidentiality and listen to the victim’s claim in a non-judgmental way. She/he will ask the victim to tell the whole story in his or her own words. The focal people will 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 will refer the victim for counselling if required.

3. The policy shall 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 or colleague), then the focal person will ask the other focal person to
mediate instead. If objectivity is still an issue, the two focal people will assess whether there is another member of staff who could step in.

4. In identifying the type/degree of harassment - After hearing the story, the college focal person (s) will 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 (s) will mediate with the harasser on the victim’s behalf.

5. The policy shall ensure sensitive mediation - Mediation with the alleged harasser will 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 will be conveyed to the alleged harasser is that the victim has been made to feel uncomfortable because of his/her behaviour. The examples of sexual harassment in the Section 3.1 will be used to demonstrate how/why an unwelcomed action can be considered sexual harassment.

6. The Safe Space Focal Persons will listen to both sides of the story - The focal person will ask the alleged harasser for their side of the story and ensure confidentiality. The focal person will 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 will remain neutral.

7. The policy shall **facilitate a resolution** - The focal person will
state that as long as the victim isn’t made to feel uncomfortable
again, no further discussions will be had. If the alleged harasser
agrees with this, the focal person will communicate this verbally to
the victim and document the mediation so that there is a record of
it. These records will remain confidential and in a secure place.
The focal person will 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 will be made aware that formal complaints will 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.

1. **Preliminary consultation** - To deal with a grievance formally, the victim (staff or student) 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 will ensure confidentiality, be sympathetic, understanding and refer the victim for counselling, if required. The focal person will also make sure the victim is aware that false accusations are sanctionable.

2. **Notification of complaint** - The victim will submit a formal written notice of the grievance to the Safe Space focal people. The grievance will 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 will 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.

3. **Convening the Grievance Committee** - Formal hearings will be dealt with by a Grievance Committee, which includes the two Safe Space focal people (one female, one male) and the CoE Principal (who will 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 will take his/her place.

4. **Acknowledging receipt** - The Grievance Committee will 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 will be forwarded to the alleged harasser involved in the grievance. The alleged harasser will 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 two). A formal hearing will then be arranged, ideally no 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.

5. **Hearing format** - The formal hearing will not be made public and will provide confidentiality to all those involved. During the meeting the Grievance Committee will ask the victim to tell the story in his/her own words. The alleged harasser or witnesses will not be present in the room during this time. The committee will ask open-ended questions and seek facts that support or disprove allegations. The committee will use the same approach when individually interviewing witnesses for the victim, the alleged harasser, and witnesses for the harasser. The committee members will each take individual notes.

6. **Decision** - At the end of the hearing, the Grievance Committee will 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 will be given to the victim, the harasser and the college to keep in its records.

7. **Grievance Appeal Procedure** - Individuals have the right of appeal 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 will be lodged in writing to the CoEPrincipal no later than one week from the date of notification of the outcome of the original hearing. The notice will 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 will 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.

8. **Appeal hearing format** - The appeal hearing will 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.

9. **Decision of the appeal hearing** - At the end of the appeal hearing, the Grievance Committee will provide an immediate decision and any appropriate action required. Once a decision has been made, documentation of the appeal proceedings and result will 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 will use their best judgement, 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

<table>
<thead>
<tr>
<th>Hostile environment examples:</th>
<th>Suggested disciplinary action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Unnecessary and unwanted nicknames such as, ‘sweetie’, ‘baby’, ‘girlfriend’</td>
<td>1. Verbal reprimand, warning to not repeat behaviour (with victim or anyone else) and a written query documenting that a warning has been given.</td>
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<td>2. Intrusive sexually explicit questions, asking personal questions about a person’s sex life</td>
<td>2. 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.</td>
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<tr>
<td>3. Spreading rumors about a person’s sexuality, sexual activity or speculations about previous sexual experience</td>
<td>3. If complaint happens again, harasser will be put on probation (see below).</td>
</tr>
<tr>
<td>4. Remarks of a sexual nature about a person’s clothing or body</td>
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<tr>
<td>5. Unnecessary and unwanted touching, pinching, massaging,</td>
<td>1. Verbal reprimand, warning to not repeat behaviour (with victim or</td>
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<tr>
<td>Sexual Harassment Policy</td>
<td>St. Joseph’s College of Education Sexual Harassment Policy</td>
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<tr>
<td>Dancing, hugging or brushing up against a person’s body</td>
<td>anyone else) and a written query document documenting that a warning has been given.</td>
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<td>6. Sexually suggestive stares, sounds or gestures such as winking, licking lips, whistling, sucking noises or pelvic thrusts</td>
<td>2. 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</td>
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<td>7. Sexually explicit jokes, pictures, calendars, cartoons, internet images or pornographic materials</td>
<td>3. Harasser will be put on probation for one year. If another case occurs during probation, termination or expulsion will be considered.</td>
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<td>8. Unwanted recurrence of telephoning, texting, emailing, comments on social media, following, stalking, gift giving, proposing or asking for a date</td>
<td>4. If there are no complaints after one year of probation, the harasser will no longer be susceptible to termination/expulsion</td>
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<td>9. Unwanted propositions of a sexual nature (including those occurring in situations that begin as reciprocal attractions, but later cease to be mutual)</td>
<td>5. If complaints do occur again after the probation has been completed, a second hearing will be conducted. The past offense will be noted and termination/expulsion will be considered.</td>
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<td>10. 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</td>
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</table>

2. 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.

3. Harasser will be put on probation for one year. If another case occurs during probation, termination or expulsion will be considered.

4. If there are no complaints after one year of probation, the harasser will no longer be susceptible to termination/expulsion.

5. If complaints do occur again after the probation has been completed, a second hearing will be conducted. The past offense will be noted and termination/expulsion will be considered.
| Actual or attempted rape or sexual assault | 1. The police will be called immediately as this is a criminal offense  
2. The harasser will be immediately terminated/expelled |
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<tbody>
<tr>
<td>Quid pro quo examples:</td>
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<td>1. Direct or indirect promises of academic benefits (such as high grades, letters of recommendation, participation in an activity), in return for sexual favors</td>
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<td>2. Direct or indirect promises of work benefits (such as promotions, housing, allowances, letters of recommendation, good appraisals), in return for sexual favors</td>
<td>2. 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</td>
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<th>False accusation by victim:</th>
<th>past offense will be noted and termination/expulsion will be considered.</th>
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<tr>
<td>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 will also be subject to disciplinary action.</td>
<td>1. Verbal reprimand, warning to not repeat behaviour (with victim or anyone else) and a written query documenting that a warning has been given. 2. Ensure victim understands why the behaviour deserves disciplinary action (it constitutes lying and deceit) and writes a letter of apology to the alleged harasser.</td>
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CHAPTER FOUR

4.0. INSTITUTIONAL AND IMPLEMENTATION FRAMEWORK

The primary responsibility and accountability for the overall implementation of the Sexual Harassment Policy for St. Joseph’s CoE lies with college actors themselves. The National Council for Tertiary Education (NCTE), National Teaching Council (NTC) and the Principal’s Conference (PRINCOF) will have oversight, while the colleges will support where necessary. This chapter discusses the roles and responsibilities of stakeholders tasked with responsibility for the effective implementation of this Sexual Harassment Policy for the tertiary sector.

4.1 Institutions and their key roles in the implementation of the Sexual Harassment Policy

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

<table>
<thead>
<tr>
<th>Institution</th>
<th>Implementation roles/responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>CoE</td>
<td>• <strong>Gender Champion</strong> – leads on the sensitisation, implementation and monitoring of this policy. Will also act as a Safe Space focal person, if appropriate.</td>
</tr>
<tr>
<td></td>
<td>• <strong>Gender Committee</strong> – 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.</td>
</tr>
<tr>
<td></td>
<td>• <strong>Principal and senior management team</strong> – provide</td>
</tr>
</tbody>
</table>
administrative support and management to the Gender Champion and Committee. Principal will act as chairperson of the Grievance Committee, if appropriate.

| NCTE | • Provides guidance on and monitoring of this policy across all 40 public CoEs  
|      | • Initiates and oversees any policy reviews/revisions if needed  
| NTC | • Provides guidance on and monitoring of this policy, particularly as it pertains to pre- and in-service teachers  
| PRINCOF | • Liaises with all 40 public CoE to ensure policy dissemination  
|      | • Supports NCTE to provide guidance on and monitoring of this policy across all colleges  
|      | • Participates in any policy reviews/revisions if needed |
CHAPTER FIVE

5.0. MONITORING AND EVALUATION

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

5.1 Institutions and their role in monitoring implementation of the Sexual Harassment Policy

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

**Table 3 - Monitoring roles/responsibilities**

<table>
<thead>
<tr>
<th>Level</th>
<th>Monitoring roles/responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>CoE level Monitoring</td>
<td>• The Gender Champion and Gender Committee are responsible for monitoring and evaluation of this policy within their CoE and TP schools\n• Senior Management, staff and students will also contribute to monitoring and evaluation efforts, when/if applicable</td>
</tr>
<tr>
<td>District and Regional</td>
<td>• Circuit Supervisors, Regional Girls’ Education Officers and District Girls’ Education Officers are responsible for monitoring and evaluation of this policy</td>
</tr>
</tbody>
</table>
### 5.2 Policy Review

On a biennial basis, a team of external, professional evaluators with local level knowledge and expertise will be assigned to assess the effectiveness of this Sexual Harassment Policy for CoEs. The evaluations will be based on robust research and relevant data. If this policy proves successful in CoEs, a policy review will determine whether this policy’s scope will be widened to formally include all tertiary institutions.

In addition to this, relevant CoE stakeholders will 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 will 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.
Definition of Key Terms

**SEXUAL HARASSMENT:** Sexual harassment is treatment that involves unwanted sexual advances, requests and other verbal or physical conduct of a sexual nature. Unwanted is a critical word because a victim may consent to certain conduct not because they want to, but because they feel pressure to do so.

**HARASSED:** The Victim at the receiving end of unwelcome sexual conduct.

**HARASSER:** The Perpetrator of sexual harassment.

**CONFIDENTIALITY:** Ensuring that information pertaining to the allegation is assessable only to those authorized to do so.

Same sex: harassment where the alleged perpetrator and the Victim are of the same gender.

Related legislation

Related policy and other documents (Exhibits)

Effective Date

November, 2016

Review Date

November, 2018

Key Words

Sex, graffiti, harassment

Owner/Sponsor

College Principal

Disciplinary Committee

Author
Governing Council

Further Information
Any other clarification concerning this policy will be referred to the following:

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Related Legislation
National Council for Tertiary Education Teaching and Learning Policy
University of Cape Coast Teaching and Learning Policy
University of Development Studies Sexual Harassment Policy
Amnesty International (Ghana Section) Harassment and Discrimination Policy
University of Cape Coast, Sexual Harassment Policy(2015)

References
Agyepong F. (2010), Sexual Harassment against Female Students in Senior High Schools. Kumasi – Ghana.
Britwum and Anokye (2006), Confronting Sexual harassment in Ghanaian Universities.
**Criminal Code**, 1960 (ACT29) – Ghana


**Ghana Labour ACT** (2003)(Act 651)


**University of Development Studies** (2018) Sexual Harassment Policy