



Protection from Harassment, Abuse and Sexual Exploitation Policy

POLICY INFORMATION

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1. POLICY STATEMENT

Statement of University Values

Based on our national and humanitarian mission, Bethlehem University seeks to instill and consolidate academic, ethical and humanitarian principles in the minds of its students, staff and faculty in agreement with its Lasallian legacy and values, and within the framework of recognized professional and ethical teaching practices. Creating a safe community environment at Bethlehem University, based on love, peace, a culture of dialogue, acceptance of others, and respect for differences, is the responsibility of all its members both as individuals and groups. Bethlehem University is committed to promoting a truly safe and supportive environment that responds to employees and students' needs and is free from all forms of discrimination and abuse, including assault, harassment, and sexual exploitation. This undertaking is also reflected in the mission of Bethlehem University, which stresses, "preparation of students to become committed persons capable of assuming leadership positions in society, and to reinforce their moral principles in good service."

In fulfillment of this mission and in support of this commitment, Bethlehem University hereby takes practical steps to raise awareness of ethical behaviors, and to reject inappropriate and wrongful behaviors committed on campus. It is committed to providing any necessary psychological, moralistic and legal support to victims, to investigating reports of sexual misconduct, and to dealing fairly and firmly with offenders of such behaviors that are condemned by our humanitarian and ethical principles.

Bethlehem University anticipates full compliance of all members of the University community, and its partners, with the highest standards of ethical conduct at all times. It undertakes to respond appropriately to prevent unacceptable behaviors within the workplace and during the implementation of its academic and humanitarian mission in a free, secure, respectful and dignified atmosphere.

The "Protection from Harassment, Abuse and Sexual Exploitation" policy is based on the following:

1. Staff, students and instructors at Bethlehem University as well as visitors to campus must adhere to the principles of personal integrity, scientific honesty, and respect for the rights, dignity and identity of others. These principles must be adhered to within the physical academic environment inside lecture rooms, laboratories, and library, administration offices, recreation areas, assembly halls, canteens, chapel, gardens, or within university life, social, cultural and entertainment activities on and off campus as part of the university activities.



2. Bethlehem University recognizes human rights to live in a safe and secure environment, and full commitment towards freedom from different kind of abuse, exploitation, and harassment, as stipulated in international human rights law. In addition, Bethlehem University recognizes that sexual abuse and harassment are forms of violence.
3. The Bethlehem University community undertakes to promote a positive culture and environment in the workplace and on a campus free from all forms of inappropriate behavior, including bullying, harassment and all forms of sexual abuse. It believes that every person enjoys the right to work in a professional and supportive environment that fosters harmonious relationships where justice, dignity and mutual respect are at the core of all actions.
4. Students enrolled at Bethlehem University shall abide by the university values, mission, traditions, rules and regulations, including the university administration's right to take disciplinary measures regarding any unethical and inhumane behaviors that constitute a violation of these laws and regulations, especially with regard to those stipulated in the Student Code of Conduct.
5. Bethlehem University adopts policies of awareness and belief in a culture of dialogue and acceptance of others regardless of color, gender, race or religion. Therefore, the university rejects, bans and prohibits discrimination against any person based on race, color, religion, gender, age, ethnicity, physical or mental disability, sexual orientation, identity, gender expression, political affiliation, social position, or marital or parental status.
6. Bethlehem University does not discriminate based on gender in its various programs, events and activities, or in the context of employment or enrollment of students. The university was established to fulfill its just, humanitarian mission, and it considers sexual misconduct, including sexual harassment, a form of sexual discrimination.

Principles

1. Bethlehem University undertakes to provide a safe and supportive environment free from harassment, intimidation and bullying, where everyone is treated with dignity, respect and without discrimination.
2. Bethlehem University believes that promotion of respect at work is the responsibility of university individuals in all facilities. Employees, workers, teachers, students ... etc. shall deal with each other with respect regardless of individual differences, rank, importance, or the position held by the respective individual.
3. Everyone shall enjoy the capacity and desire to change an unacceptable behavior. Offensive language is not acceptable anywhere in university facilities. It is imperative to identify how behavior affects others, and to seek to change it if such behavior requires modification.
4. The university adopts a policy of zero tolerance for any form of bullying, harassment or abuse of job authority in the workplace. Therefore, all complaints and incidents regarding the violation of work ethics shall be taken seriously and relentlessly in accordance with the official laws and policies. The university administration shall promptly investigate any complaint and will take disciplinary and punitive measures as needed.
5. Bethlehem University shall undertake to ensure privacy and that no harm is inflicted on those who file a complaint on a genuine belief that they are suffering from bullying, sexual harassment or abuse.

2. DEFINITIONS

1. **Unacceptable Behavior:** It is any negative, inappropriate, or unwanted behavior which leaves a negative impact on the individual or the society where this individual lives. This effect may cause distress or discomfort to the respective individual. While this behavior appears in a wide variety of behaviors, which



focus on sex, sexual harassment, assault, sexual exploitation, stalking, bartering and relationships of a violent nature all of which are forms of sexual misconduct. Sexual misconduct may occur between strangers or acquaintances, or people who know each other well, including people who share or were engaged in an intimate or sexual relationship.

2. **Bullying:** It is a form of aggressive behavior by a person or group of people towards another person, and it constitutes abuse or misuse of work authority, or / and among the students, through means that undermine, insult, distort or injure the victimized person.
3. **Harassment:** It is a rejected and condemned behavior which results in a violation of the dignity of the individual, or creates a hostile, insulting, condescending or violent work environment towards this individual.
4. **Sexual Harassment:** It is any act, advance or speech of a sexual nature that is reprehensible, rejected and hideous and violates the body, privacy or feelings of a person causing this person to lose safety, respect or comfort. It is a rejected conduct of a sexual nature that makes the person feel offended, humiliated, and / or intimidated. It includes cases when a person is asked to engage in sexual activity as a precondition to hold a job, or situations that create a hostile, intimidating or degrading environment for the victim. Sexual harassment includes verbal, non-verbal, implicative and physical conduct such as sexual assault. It includes any behavior that leads to harassment and limits a student's capacity to participate and benefit from academic programs at the university or the ability of faculty or staff to work, regardless of the fact that it happens either once or several times.
5. **Prohibition of Sexual Harassment:** Sexual harassment may take many forms, including what may happen between equivalents, such as student to student, faculty member to faculty member, employee to employee with the same status, or visitor / part-timer with employees. Sexual harassment can happen between people who are non-equivalents in rank, status and authority such as subordinate supervisor and supervisor, faculty member and student, and trainer and athlete. Although sexual harassment often occurs in the context of the abuse of functional authority by a superior, a person who appears to have less authority in a relationship may also commit sexual harassment (such as when a student harasses a faculty member). It can take place when a person meets with an acquaintance, a stranger or a person with whom they have or have had a previous personal, intimate or sexual relationship. Sexual harassment can be directed against a person of any race, ethnicity, religion, political affiliation, status, gender or sexual orientation. Sexual harassment can be used by a superior authority whenever a change in a person's academic or job status is being negotiated. It is taking pictures (videos or photographs) or audio recordings of another person's sexual activity, intimate parts of the body, without consent of that person.
6. **Abuse of Work Authority:** is the improper use of a position, influence or power by an individual against a colleague or a group of colleagues. This is especially dangerous when an individual misuses his/her influence, position, or authority to negatively affect terms of employment, including, for example, appointment of another person, giving an assignment to that person, renewal of a contract, and evaluation of one's performance or promotion. Abuse of authority may include creation of a hostile or offensive work environment by intimidation, threat, extortion or coercion to do or implement or call for an action that is morally unacceptable in society or in violation of university laws.
7. **Violence against Women:** is any violent act, speech, or action initiated by sex bigotry, resulting in harm or suffering to a woman, whether physical, sexual, or psychological. It includes threats of such acts, coercion or arbitrary deprivation of freedom, whether in public or private life. It is a violation of human rights and a form of discrimination against women.
8. **Gender-based Violence:** is violence directed against a person because of that person's gender or violence that affects persons of a particular gender disproportionately. It includes actions which cause physical,



- sexual, or psychological detriment or suffering, or which involve a threat to commit such actions, or coercion and exploitation of the other party, or any form of deprivation of freedom.
9. **Cyber Harassment:** It is any form of unwanted online behavior of a sexual nature for the purpose of violating another person's dignity especially by creating an intimidating, hostile, insulting, or abusive environment. Electronic harassment is often used as an umbrella term to refer to other forms of online violence, including sexual harassment, cyberbullying, cyber-stalking, and pornographic retaliation.
 10. **Electronic Blackmail:** It is the process of threatening the victim, by publishing private photos or videos, or revealing confidential information, in exchange for the payment of sums of money, or acceding to another request, or forcing the victim to do unwanted scandalous or intimate acts. This extortion occurs by luring victims by e-mail or social media sites which are accessible to all age groups.
 11. **Cyberbullying:** It is an extension of traditional bullying in cyberspace, and it includes frequent verbal or psychological harassment by one individual or a group of individuals against an individual, or a group of others, through the Internet and / or mobile phones. The signs that characterize electronic bullying are use of electronic or digital means, deliberate harm, an imbalance of power between the offender and the victim, and the offender acting anonymously without revealing their identity and so escaping accountability.
 12. **Electronic Stalking:** It is a process of spying, focusing, or gathering information about individuals via the Internet other electronic means, through surveying them against their will. This tactic and its analysis are often used as extensions of violence towards an intimate or non-intimate partner. Electronic stalking involves frequent incidents, which alone may be harmful, but collectively undermine the victim's sense of safety causing distress and fear.

3. PURPOSE AND SUMMARY

This policy aims to develop a safe workplace and scientific environment as well as positive educational, academic and human relationships that encourage commitment to respectful behavior in all university or affiliated facilities. It aims to prevent and prohibit all forms of unacceptable behavior. The provisions of this policy shall apply on the university campus, the Institute for Community Partnership, Mar Andrea, Mount David premises in Bethlehem, the al-Qubeiba Nursing School and the Brother Vincent Malham Center for Teaching of Arabic for Foreigners and Heritage Preservation, and any site to be attached to the University in the future, as well as in all activities that are approved by Bethlehem University. These policies shall also apply to students in field training institutions such as hospitals, schools, and other community institutions.

This policy shall specify the principles and standards related to inappropriate or unacceptable conduct, which includes all forms of bullying and harassment based on gender.

4. APPLICATION / SCOPE

This policy shall apply to all University employees (whether academics or administrative), students, volunteers, and it shall include members of Boards and Councils, counsellors or external committees ... etc., even if their work contracts differ in degrees or number of working hours.

Cooperating partners, contractors, service providers and official suppliers working with Bethlehem University shall abide by this policy and all university policies and procedures.

5. STATEMENT OF ROLES & RESPONSIBILITIES

1. Employee or Student:
Submit the complaint in writing via the designated e-mail or hand it to the direct supervisor with attachments (if any).



2. Duties of the Direct Supervisor:
Receiving the complaint with the attachments (if any) and transferring it directly to the Executive Vice President without taking any action.
3. Executive Vice President:
 - i. Receive the complaint with the attachments (if any) either via the designated email or by hand.
 - ii. After examining the merits of the complaint and verifying its components and validity, an investigation committee is formed with the membership of the Deanship of Student Affairs Office in the event that any of the students is involved in the complaint, or with the membership of the Human Resources Office in the event that any of the employees is involved in the complaint, or both if the complaint involves both parties (employees and students).
 - iii. Receiving the recommendations of the investigation committee after the completion of investigation, and discussing them with the Vice Chancellor of the University to reach a decision on the matter.
 - iv. Handing over the decision taken in writing to the concerned parties.
4. Investigation Committee:
 - i. After the members of the investigation committee are appointed by the Executive Vice President, the committee members choose a coordinator among themselves to manage the committee and record the minutes of the meetings.
 - ii. Carrying out all investigation tasks, collecting data and hearing the statements of the concerned parties, including witnesses (if any).
 - iii. Once the investigation is completed, the committee's recommendations are documented and submitted to the Executive Vice President.

6. PROCEDURES

Mechanisms of Implementation

Bethlehem University administration at all levels, and the students, shall undertake to guarantee the implementation of policies that give guidelines to implement, follow up, and review minimum standards mentioned above in conjunction with the Code of Conduct regarding working or joining Bethlehem University, for any person under whatever entity or capacity. Hence, everyone shall prudently review such policies in order to carry them out and, and shall be fully aware of his/her responsibilities to ensure respect at the workplace and compliance to the policies and Code of Conduct of Bethlehem University.

1. Shall adopt and implement respectful policies and procedures at the workplace based on the aforementioned principles, considering local legislations and requirements.
2. Shall ensure the availability of grievance processes that address individual and group concerns raised by staff and students in the light of this policy.
3. Shall ensure that all employees, students, beneficiaries, and the local community are aware of the Code of Conduct and policy of workplace respect, both at Bethlehem University and all its facilities.
4. Shall ensure that all responses to complaints and observations, focus on those who have experienced abuse, considering that their needs and best interests remain a top priority in the investigation process.
5. Shall provide psychological, moralistic and legal support to survivors of harm caused by staff, students, or anyone connected to Bethlehem University community, regardless of whether or not a formal investigation was initiated.
6. Shall be ready to provide an updated list of local institutions and contacts that provide support in such cases. The list shall include, for example, information related to legal support, medical,



psychological and social counseling, and mechanisms for communication with these bodies provided that the survivor is the focus of decisions made in relation with this support.

7. Shall collect data in confidential ways, ensure no information leakage, store it in safe ways, and make it accessible to concerned authorities only when essential and taking into account the higher interest of the university, faculty and students.

Employee and Student Disciplinary Procedures

1. Based on the severity of cases of sexual abuse in which an employee, student or worker, in the university or associated facilities, may be involved, as well as the criminal sentence that might result from legal procedures in relation to these cases, the accused may be referred to local authorities who might decide to pursue a criminal prosecution, who might be proven guilty of charges. Therefore, disciplinary measures shall apply according to the Employees Handbook and the Students Code of Conduct, including dismissal from the university without prior notice, as applicable.
2. Implementation of appropriate disciplinary measures, approved by the Disciplinary Committee against offender students, includes suspension or dismissal from the university.
3. Disciplinary actions shall be taken against employees or students who failed to report or encouraged the occurrence of sexual exploitation and abuse, or who condoned this crime, thus aggravating the matter.
4. In order to take appropriate measures against accused individuals, it is essential to differentiate reports made with sincere good faith or suspicions regarding actions of sexual exploitation and abuse without sufficient evidence, from unfounded, deliberate and orchestrated reports whose aim is to discredit and defame individuals and honorable institutions in society.
5. Bethlehem University shall initiate measures on a case-by-case basis in order to challenge any exploitation and violation of this policy. If any exploitation and / or violation of this policy is established, the university shall have the right to take the following measures including, but not limited to, immediate termination of the contractual relationship (non-employee, co-operation agreements, or other partnerships).
6. The university shall maintain notes in its records to follow up on individuals from within the university or contracting with it, (after it has become evident that they participated, encouraged, or condoned unacceptable or illegal behaviors). The university shall reserve the right not to allow them to participate in bids nor to enter into contractual relations in the future.
7. In the light of this policy, the university shall amend relevant contracts and standard requests for offers related to the university. The policy stipulates that university contractors shall be required to take all appropriate measures to prevent sexual exploitation and abuse by their employees, or any other persons employed by the contractor to carry out any acts under contract. Any breach of this contract by the contractor shall authorize the university to terminate the contract instantly.

Procedures for dealing with incidents of Bullying and Harassment

1. Complaints: Bethlehem University employees, faculty members and students have the right to express their concerns about bullying and harassment they may face from employees, faculty members, through an officer or direct supervisor. If they feel they cannot do this, they can use a designated email: report.pseah@bethlehem.edu
2. When an incident of bullying or harassment, among staff of various positions and titles, is observed or witnessed, it must be reported through the university official e-mail, pertaining to these special



complaints. These incidents will be dealt with through the relevant formal complaints procedures system.

3. Investigation: These complaints, whether in writing or through the designated e-mail, are considered formal complaints received by the University Executive Vice President (EVP) who shall refer the complaint, according to its nature, to the Human Resources Department if the complaint is related to employees, and / or the Deanship of Student Affairs if it is related to students. An investigation committee shall be formed, and the Executive Vice President of the University shall oversee the work of this committee. The Executive Vice President shall take into consideration the eligibility of the committee members in terms of their functional position and academic specialization as well as the relevant departments. The committee shall be the point of reference in the fact-finding process. Investigation shall be according to its relationship with the parties of the victims or alleged offenders, taking care that there are no conflicts of interest. The committee members are selected from the Deanship of Student Affairs and / or the Department of Human Resources, in direct coordination, and under supervision of, the Executive Vice President, once the committee has finished its investigation, it shall decide what it should recommend. The recommendation shall be submitted to the Executive Vice President. In the light of the privacy and confidentiality of the cases, the EVP shall discuss the issue with the University Vice Chancellor, so that a decision can be issued and implemented.

7. COMPLIANCE

Since the Executive Vice President is entrusted with this policy, it is his responsibility to report in writing or through email on any breach to this policy, including instances of disclosures (or "whistle-blowing"), by any BU user(s) to the VP of Human Resources, stating the breach details and recommending any disciplinary action as per BU policies in this respect.

8. RELATED INFORMATION