



SEXUAL HARASSMENT AND MISCONDUCT POLICY

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Title

This Policy shall be cited as the University of Ghana Sexual Harassment and Misconduct Policy, 2026.

Purpose

The University of Ghana is committed to creating, maintaining, and continuously improving a safe, respectful, inclusive, and dignified academic, residential, working, and social environment for every person who participates in the life of the University. The University affirms that sexual harassment and sexual misconduct are inconsistent with its values, its educational mission, the integrity of employment and academic relationships, and the right of every person to work, study, teach, research, live, and interact free from intimidation, coercion, humiliation, discrimination, exploitation, and abuse.

The purpose of this Policy is to establish a clear, coherent, and institutionally enforceable framework for the prevention, prohibition, reporting, investigation, adjudication, sanctioning, and redress of sexual harassment and sexual misconduct within the University Community. This Policy is intended to ensure that complaints of sexual harassment and misconduct are handled seriously, fairly, promptly, sensitively, confidentially, and in a manner that protects the rights and wellbeing of all affected persons.

This Policy further seeks to provide an institutional mechanism by which:

- a) conduct amounting to sexual harassment and misconduct is clearly identified and prohibited;
- b) members of the University Community understand their rights, responsibilities, and obligations;
- c) victims, complainants, witnesses, and other affected persons are protected and supported;
- d) respondents are treated fairly and afforded due process;
- e) the University is equipped to respond promptly and effectively to complaints and reports; and
- f) the University fosters a culture of prevention, accountability, education, and zero tolerance for sexual harassment and misconduct.

This Policy also recognises that sexual harassment and misconduct may occur in subtle, overt, physical, verbal, non-verbal, written, digital, psychological, relational, or institutional forms. It accordingly adopts a broad and protective approach to prohibited conduct, while ensuring procedural fairness in the handling of all allegations.

Objectives

The objectives of this Policy are to:

- a) prevent sexual harassment and misconduct through sustained education, awareness creation, policy dissemination, capacity building, institutional leadership, and culture change initiatives across the University;

- b) prohibit sexual harassment and misconduct in all forms, including sexual abuse, sexual assault, sexual exploitation, sexual intimidation, technology-facilitated sexual misconduct, and exploitative sexual relationships characterised by abuse of power or authority;
- c) provide clear reporting and complaint mechanisms through which victims, complainants, third parties, and other authorised persons may bring incidents or concerns to the attention of the University;
- d) ensure prompt, fair, impartial, and trauma-informed response processes for the receipt, assessment, investigation, and adjudication of complaints of sexual harassment and misconduct;
- e) protect complainants, victims, witnesses, reporters, and participants in University processes from retaliation, intimidation, victimisation, further harm, or institutional neglect;
- f) guarantee fair hearing and due process for respondents, including notice of allegations, opportunity to respond, opportunity to be heard, and a decision based on the evidence presented;
- g) provide support, protection, and reasonable accommodation for persons affected by sexual harassment and misconduct, including access to counselling, psychosocial support, safety planning, academic accommodations, workplace adjustments, and other interim protective measures where appropriate;
- h) recommend and facilitate appropriate sanctions and remedial measures where violations are established, taking account of the gravity of the conduct, the impact on the victim, the presence of aggravating or mitigating factors, and the need for accountability, deterrence, rehabilitation, and institutional integrity;
- i) promote institutional coordination among the University Council, the Vice-Chancellor, CEGENSA, the Counselling and Career Development Directorate, the Anti-Sexual Harassment Committee, and other relevant offices or authorities in implementing this Policy;
- j) ensure effective record-keeping, data management, institutional monitoring, and periodic review of the University's response to sexual harassment and misconduct;
and
- k) affirm the University's commitment to dignity, equality, non-discrimination, bodily autonomy, and safety as foundational values of the University Community.

Guiding Principles

This Policy shall be interpreted and applied in accordance with the following guiding principles:

Dignity and Respect

Every member of the University Community is entitled to be treated with dignity and respect. Sexual harassment and misconduct violate personal dignity and undermine the moral, academic, and professional foundation of the University.

Equality and Non-Discrimination

The University shall not tolerate conduct that exploits or disadvantages persons on the basis of sex, gender, sexuality, status, vulnerability, dependency, or institutional position. This Policy shall be applied in a manner that promotes substantive equality and protects persons from discriminatory treatment.

Safety and Wellbeing

The University shall prioritise the physical, psychological, emotional, academic, and professional safety of persons affected by sexual harassment and misconduct. Appropriate support and protective measures shall be considered as early as possible in every case.

Fairness and Due Process

The University shall ensure that all complaints and reports are handled fairly, objectively, and without bias. Both complainants and respondents are entitled to fair treatment, and no finding of responsibility shall be made except through the procedures established under this Policy.

Confidentiality

Complaints, reports, records, and proceedings under this Policy shall be treated with the highest degree of confidentiality consistent with the need to investigate, adjudicate, protect affected persons, implement outcomes, comply with law, or safeguard the University Community.

Non-Retaliation

No person shall be subjected to retaliation for making a complaint or report in good faith, supporting another person in doing so, providing information, serving as a witness, or otherwise participating in any process under this Policy.

Institutional Accountability

The University bears a continuing responsibility to prevent sexual harassment and misconduct, to respond effectively where it occurs, and to ensure that institutional structures are capable, accessible, coordinated, and trustworthy.

Accessibility and Inclusion

Reporting and response mechanisms under this Policy shall be designed to be reasonably accessible to students, staff, faculty, affiliates, agents, and third parties, including persons with disabilities or persons requiring linguistic, psychosocial, or procedural support.

Trauma-Informed and Survivor-Sensitive Response

In implementing this Policy, the University shall seek to avoid unnecessary retraumatisation, victim-blaming, hostile questioning, or insensitive handling of complaints. Processes shall be conducted with appropriate care for the experience and vulnerability of affected persons, while preserving fairness to all parties.

Timeliness

Complaints and reports shall be handled as promptly as reasonably possible. Delays may compromise safety, evidence, wellbeing, and confidence in the institutional process. At the same time, thoroughness and fairness shall not be sacrificed merely for speed.

Integrity of Academic and Employment Relationships

The University recognises that relationships involving power imbalance may compromise genuine consent, distort professional judgment, and undermine institutional trust. This Policy shall therefore be interpreted in a manner that protects the integrity of supervisory, evaluative, mentoring, and instructional relationships.

Compliance with Law and University Norms

This Policy shall operate alongside applicable law, the University of Ghana Act, Statutes, Conditions of Service, Codes of Conduct, Student Regulations, and other relevant University instruments. Where conduct may also constitute a criminal offence or professional misconduct, the University may take appropriate internal action notwithstanding any referral to external authorities.

Application and Scope

Persons to Whom the Policy Applies

- a) This Policy applies to all members of the University Community, including: students, whether undergraduate, graduate, regular, distance, visiting, exchange, or special students;
- b) teaching and non-teaching staff;
- c) faculty members;
- d) officers, employees, and appointees of the University;
- e) persons serving the University as agents or under its control;
- f) affiliates, interns, volunteers, consultants, researchers, contractors, and service providers engaged with the University; and
- g) third parties who interact with the University, its members, activities, premises, systems, or programmes.

Conduct Covered by the Policy

- a) This Policy applies to conduct that constitutes sexual harassment or sexual misconduct and that occurs:
on any campus, site, facility, office, hostel, residence, classroom, laboratory, library,

field station, clinic, transport system, or any other premises under the authority or control of the University;

- b) in the context of any academic, employment, research, extracurricular, residential, sporting, social, cultural, ceremonial, or official University activity, whether on or off campus;
- c) through digital or electronic means, including email, messaging platforms, social media, learning management systems, telephone communication, video conferencing platforms, websites, digital storage, or other technology-enabled spaces, where the conduct has a sufficient nexus to the University or affects a member of the University Community;
- d) between persons where one or both are members of the University Community and the conduct has implications for the educational, work, residential, or safety environment of the University; and
- e) in circumstances where the alleged conduct occurred during a person's period of association with the University, including cases involving former members as provided under this Policy.

Extra-Institutional Reach

- a) This Policy may also apply where:
 - the complainant is not a member of the University Community but is subjected to sexual harassment or misconduct by a member of the University Community in circumstances connected to the University;
- b) the respondent is not a member of the University Community, but the conduct occurs within a University setting, programme, or relationship, or affects the safety or well-being of a member of the University Community; or
- c) the conduct, though occurring off campus or outside formal University activities, has a substantial impact on the University environment, the participation of a person in University life, or the integrity of University relationships.

Relationship with Other Processes

- a) Nothing in this Policy prevents the University from:
 - referring any matter to law enforcement or another competent authority where the conduct may constitute a criminal offence or regulatory violation;
- b) taking immediate administrative or protective action where necessary to protect individuals or the institutional environment;
- c) proceeding under parallel disciplinary, employment, academic, or professional processes where the facts so require; or
- d) cooperating with external bodies, provided that such cooperation does not relieve the University of its own responsibilities under this Policy.

Good Faith Use of the Policy

This Policy shall be used in good faith. It is intended to provide protection and redress for genuine concerns and complaints, while also protecting against abuse of process, deliberate falsehood, malicious reporting, or retaliatory misuse.

DEFINITIONS

In this Policy, unless the context otherwise requires—

- a) **“Complainant” means** a person who makes a formal complaint under this Policy alleging that they have been subjected to sexual harassment or sexual misconduct, whether on their own behalf or, where permitted, on behalf of another person, and includes—
 - a member of the University Community;
- b) a former member of the University Community; or
- c) a third party where the Policy permits third-party reporting; and for the avoidance of doubt includes a person whose complaint is initiated orally and later reduced into writing or who requires assistance to prepare or submit a complaint due to incapacity, disability, trauma, or other limitation;

“Consent” means the voluntary, informed, specific, and unambiguous agreement between persons to engage in sexual activity, which—

- a) is given freely and without coercion, intimidation, manipulation, deception, or abuse of authority;
- b) is clearly communicated through words or conduct;
- c) is ongoing and may be withdrawn at any time; and
- d) relates to the specific act in question and shall not be inferred from prior or existing relationships; and for the purposes of this Policy—
 - i. silence, passivity, or lack of resistance does not constitute consent;
 - ii. consent cannot be obtained where a person is incapacitated; and
 - iii. consent is invalid where there is a significant imbalance of power;

“Prohibited Relationship” means a sexual or romantic relationship existing within a context of power imbalance where one party has actual or perceived authority, influence, or control over the academic, professional, or personal outcomes of the other, including—

- a) student–teacher relationships;
- b) supervisor–subordinate relationships;
- c) examiner–student relationships;
- d) mentor–mentee relationships; or

- e) any relationship involving evaluative or decision-making authority; and for the purposes of this Policy apparent consent does not negate the exploitative nature of such relationship;

“Respondent” means a person against whom a complaint of sexual harassment or sexual misconduct has been made under this Policy, and includes—

- a) a current member of the University Community;
- b) a former member of the University Community; or
- c) in appropriate cases, a third party whose conduct falls within the scope of this Policy; and a Respondent shall be presumed not responsible unless and until a determination is made in accordance with this Policy;

“Retaliation” means any adverse action, threat, intimidation, harassment, discrimination, or other detrimental conduct directed against a person because that person—

- a) made or intended to make a complaint;
 - b) participated in a process under this Policy;
 - c) supported another person; or
 - d) opposed prohibited conduct;
- and includes threats, coercion, disadvantage, exclusion, reputational harm, or interference with access to opportunities;

“Sexual Assault” means any actual or attempted sexual act carried out without the consent of another person, including acts involving force, coercion, intimidation, incapacity, or non-consensual touching;

“Sexual Exploitation” means taking sexual advantage of another person without their consent for personal benefit or for the benefit of a third party, including— recording or transmitting sexual images without consent;

- a) facilitating observation of private sexual acts;
- b) inducing incapacitation for sexual activity; or
- c) exposing a person to sexual content without consent;

“Sexual Harassment” means any unwelcome, unwanted, offensive, or inappropriate conduct of a sexual nature, whether verbal, non-verbal, physical, written, or digital, that—

- a) is made a condition of academic or employment status;
- b) forms the basis for decisions affecting opportunities; or
- c) creates an intimidating, hostile, degrading, humiliating, or offensive environment; and may occur as a single incident or pattern of behaviour;

“Sexual Misconduct” means a broad category of prohibited conduct involving the use of power, control, coercion, intimidation, or exploitation to harm another person in a sexual context, including sexual harassment, abuse, assault, exploitation, intimidation, violence, and related retaliatory conduct;

“Victim” means a person who has been subjected to sexual harassment or sexual misconduct whether or not that person makes a formal complaint, and may be the same person as the Complainant or a different person in cases of third-party reporting.

Third-Party Report

A **Third-Party Report** is a report of sexual harassment or misconduct made by a person other than the Victim or Complainant.

- a) This includes:
 - reports made by witnesses;
- b) reports made by colleagues, friends, or family members;
- c) reports made by institutional officers or authorities who become aware of misconduct.

Third-party reports may trigger preliminary assessment, protective measures, or further inquiry, subject to the wishes and safety of the Victim.

Interim Protective Measure

An **Interim Protective Measure** refers to any temporary action taken by the University prior to the final determination of a complaint in order to:

- a) protect the safety and well-being of any person;
- b) prevent further harm or misconduct;
- c) preserve the integrity of the investigation or adjudication process.

Such measures may include:

- no-contact directives;
- temporary suspension;
- reassignment of duties;
- academic accommodations;
- restriction of access to facilities.

Interim measures are precautionary and do not constitute a finding of responsibility.

University Community

University Community includes all persons associated with the University of Ghana in any capacity, including:

- (a) students;
- (b) staff and faculty;
- (c) officers and employees;
- (d) agents, affiliates, and contractors;
- (e) volunteers, interns, and consultants;
- (f) any person participating in University programmes, activities, or operations.

Former Member

A **Former Member** is a person who previously belonged to the University Community in any capacity, including former students, staff, or affiliates.

For the purposes of this Policy:

- the University retains jurisdiction over conduct that occurred during the person's period of association with the University;
- appropriate sanctions may still be imposed where a violation is established.

Conflict of Interest

A Conflict of Interest arises where a person involved in the implementation of this Policy has a personal, professional, relational, or financial interest that may:

- (a) compromise their impartiality;
- (b) create a perception of bias; or
- (c) undermine the integrity of the process.

Such persons shall:

- disclose the conflict promptly; and
- recuse themselves from participation in the relevant matter.

Technology-Facilitated Misconduct

Technology-Facilitated Misconduct refers to sexual harassment or misconduct carried out through digital or electronic means, including:

- (a) cyberstalking;
- (b) non-consensual sharing of intimate images;
- (c) sexually explicit messaging or harassment;
- (d) online impersonation or doxxing;
- (e) misuse of digital learning or communication platforms.

Committee

The **Committee** refers to the **Anti-Sexual Harassment Committee** established under this Policy, including any Adjudication Panel constituted from its members.

Policy

Policy means the University of Ghana Sexual Harassment and Misconduct Policy, 2026, including all Parts, Annexes, and any amendments made thereto.

PROHIBITED CONDUCT

This Part sets out the categories of conduct that are expressly prohibited under this Policy. The provisions in this Part shall be interpreted broadly and purposively to ensure effective protection of members of the University Community and to promote a safe, respectful, and dignified environment.

General Prohibition

Any act or omission that constitutes sexual harassment or sexual misconduct, as defined under this Policy, is prohibited.

Prohibited conduct may occur:

- (a) as a single serious incident; or
- (b) as a pattern of repeated behaviour; or
- (c) through physical, verbal, non-verbal, written, or digital means; or
- (d) directly or indirectly, including through third parties or intermediaries.

A finding of prohibited conduct does not require proof of intent where the effect of the conduct is sufficiently harmful, offensive, or intimidating.

Sexual Harassment

Sexual harassment is prohibited in all its forms.

Without limiting the generality of the definition, sexual harassment includes conduct such as:

Verbal Conduct

- (a) sexually suggestive comments, jokes, or innuendos;
- (b) persistent remarks about a person's body, appearance, clothing, or sexuality;
- (c) propositions, requests, or demands for sexual favours;
- (d) comments implying academic or employment benefits in exchange for sexual compliance.

Non-Verbal Conduct

- (a) sexually suggestive gestures, signals, or expressions;
- (b) leering, staring, or intrusive observation of a sexual nature;
- (c) display of sexually explicit or offensive materials;
- (d) indecent exposure.

Physical Conduct

- (a) unwanted touching, including hugging, kissing, patting, pinching, or brushing against another person;
- (b) physical intimidation or blocking movement;
- (c) any form of non-consensual physical contact of a sexual nature.

Written and Digital Conduct

- (a) sending sexually explicit messages, images, or content;
- (b) posting or sharing sexually suggestive or degrading material about a person;
- (c) repeated and unwanted electronic communication of a sexual nature;
- (d) harassment through social media or digital platforms.

Quid Pro Quo Harassment

- (a) conditioning academic or employment benefits on submission to sexual conduct;
- (b) penalising a person for rejecting sexual advances;
- (c) influencing decisions on grades, promotions, funding, or opportunities based on sexual compliance.

Hostile Environment Harassment

Conduct that creates an environment that is intimidating, hostile, degrading, humiliating, or offensive, including:

- persistent sexual comments or behaviours;
- pervasive sexualised culture within a unit or group;
- conduct that interferes with a person's academic or work performance.

Sexual Misconduct

Sexual misconduct is prohibited and includes a range of serious behaviours involving abuse, coercion, or exploitation.

Sexual Abuse

- (a) engaging another person in sexual activity through force, coercion, or manipulation;
- (b) engaging in sexual activity in a manner that humiliates, degrades, or violates the dignity of another person;
- (c) knowingly exposing another person to sexually transmitted infections without disclosure.

Sexual Assault

- (a) non-consensual sexual intercourse or contact;
- (b) attempted sexual acts without consent;
- (c) use or threat of force in sexual activity;
- (d) sexual acts committed where the victim lacks capacity to consent.

Sexual Exploitation

- (a) taking sexual advantage of another person without consent;
- (b) recording or sharing intimate images or acts without consent;
- (c) enabling third parties to observe private sexual acts;
- (d) inducing intoxication or incapacitation for sexual purposes.

Sexual Intimidation

- (a) threats of sexual harm;
- (b) stalking, whether physical or digital;
- (c) behaviour that instils fear of sexual violation or harm.

Sexual Violence

Any severe form of sexual misconduct involving force, coercion, or threat, including rape and related offences.

Prohibited Consensual Relationships Involving Power Imbalance

The University prohibits sexual or romantic relationships where there is a **real or perceived power imbalance**, including but not limited to:

- (a) lecturer–student relationships;
- (b) supervisor–subordinate relationships;
- (c) examiner–student relationships;
- (d) mentor–mentee relationships;
- (e) any relationship where one party can influence the academic, professional, or personal advancement of the other.

Rationale

Such relationships are inherently problematic because:

- they undermine the integrity of academic and professional evaluation;
- they create risks of coercion, exploitation, or undue influence;
- they impair genuine consent due to dependency or authority;
- they may create unfair advantages or perceptions of bias.

Effect

For the purposes of this Policy:

- apparent consent does not negate the prohibited nature of the relationship;
- participation in such a relationship may constitute sexual misconduct;
- failure to disclose or manage such relationships may aggravate liability.

Retaliation

Retaliation is strictly prohibited.

No person shall:

- (a) intimidate, threaten, harass, or harm another person for making a complaint or report;
- (b) disadvantage a person academically or professionally for participating in a process under this Policy;

- (c) engage in reprisals against witnesses, supporters, or investigators;
- (d) attempt to silence, isolate, or discredit a complainant or participant.

Retaliation shall be treated as an independent violation and may attract separate sanctions.

False and Malicious Complaints

The University recognises the seriousness of allegations under this Policy and the potential harm caused by false accusations.

Accordingly:

- (a) any person who knowingly makes a false, fabricated, or malicious complaint shall be subject to disciplinary action;
- (b) a complaint shall not be considered malicious merely because it is not substantiated;
- (c) good faith complaints, even if unproven, shall not attract any penalty.

In determining whether a complaint is malicious, the University shall consider:

- evidence of deliberate fabrication;
- intent to mislead or harm;
- reckless disregard for truth.

Technology-Facilitated Misconduct

Sexual harassment and misconduct carried out through technology are prohibited.

This includes:

- (a) cyberstalking or online harassment;
- (b) non-consensual sharing of intimate images (“revenge pornography”);
- (c) creation or distribution of sexually explicit deepfakes or manipulated media;
- (d) sending unsolicited sexual content;
- (e) harassment through academic or professional digital platforms;
- (f) doxxing or exposure of private information for sexualised harm.

Digital conduct shall be treated with the same seriousness as in-person conduct.

Additional Illustrative Conduct

Without limiting the above provisions, the following behaviours may constitute prohibited conduct where the context and effect satisfy the definitions under this Policy:

- (a) persistent and unwanted romantic or sexual attention;
- (b) excessive gifts or communications with sexual undertones;
- (c) gossiping about a person’s sexual life or orientation;
- (d) humiliating or degrading comments about gender or sexuality;
- (e) punishing or disadvantaging a person for rejecting advances;
- (f) using authority to secure sexual access or compliance;
- (g) interfering with a person’s academic or professional progress due to sexual dynamics.

Contextual Interpretation

In determining whether conduct is prohibited under this Policy, the following factors may be considered:

- (a) the nature, severity, and frequency of the conduct;
- (b) the relationship between the parties, including any power imbalance;
- (c) the context in which the conduct occurred;
- (d) the impact of the conduct on the complainant or victim;
- (e) whether the conduct was unwelcome;
- (f) whether a reasonable person would find the conduct offensive, intimidating, or harmful.

Non-Exhaustive Nature of Prohibited Conduct

The categories of prohibited conduct set out in this Part are **not exhaustive**.

Conduct not specifically listed may still constitute a violation of this Policy where it falls within the definitions of sexual harassment or sexual misconduct or is inconsistent with the objectives and guiding principles of this Policy.

INSTITUTIONAL FRAMEWORK

This Part establishes the institutional structures, authorities, and governance arrangements responsible for the implementation, administration, enforcement, and continuous improvement of this Policy.

General Institutional Responsibility

The University shall establish and maintain a coherent institutional framework to:

- (a) prevent sexual harassment and misconduct;
- (b) receive and respond to complaints and reports;
- (c) investigate and adjudicate allegations;
- (d) provide support and protection to affected persons; and
- (e) ensure accountability, monitoring, and policy effectiveness.

All organs, offices, and officers of the University shall cooperate in good faith to give full effect to this Policy.

University Council

The **University Council** shall have overall policy oversight and institutional responsibility for ensuring compliance with this Policy.

Without limiting its general mandate, the University Council shall:

- a) ensure that this Policy is integrated into the University's governance framework, including Statutes, Codes of Conduct, Conditions of Service, Student Regulations, and related instruments;
- b) promote a University-wide culture of dignity, equality, and zero tolerance for sexual harassment and misconduct;
- c) ensure that adequate resources are allocated for the effective implementation of this Policy, including training, support services, and institutional capacity;
- d) require periodic reporting on the implementation and effectiveness of this Policy;
- e) ensure that the Policy is widely disseminated to all members of the University Community; and
- f) exercise such other oversight functions as may be necessary to ensure institutional accountability.

Vice-Chancellor

The **Vice-Chancellor**, as the Chief Disciplinary Officer of the University, shall be responsible for the operational enforcement of this Policy.

The Vice-Chancellor shall:

- a) ensure compliance with this Policy across all units of the University;
- b) constitute the Anti-Sexual Harassment Committee and appoint its Chairperson;
- c) receive findings, recommendations, and reports from the Committee and ensure their prompt implementation;
- d) approve or confirm sanctions and disciplinary measures in accordance with the University's disciplinary framework;
- e) take urgent administrative or protective measures where necessary to safeguard persons or the institutional environment;
- f) facilitate coordination among relevant University units involved in the implementation of this Policy; and
- g) issue administrative directives where necessary for the effective operation of this Policy.

Centre for Gender Studies and Advocacy (CEGENSA)

The **Centre for Gender Studies and Advocacy (CEGENSA)** shall play a central role in prevention, advocacy, and institutional support.

CEGENSA shall:

- a) collaborate with the Anti-Sexual Harassment Committee in implementing this Policy;
- b) support the establishment and operation of a **Sexual Harassment Crisis Centre** or equivalent reporting and response unit;
- c) lead awareness creation, education, and advocacy initiatives on gender, equality, and sexual misconduct;
- d) develop and disseminate educational materials to promote compliance with this Policy;
- e) provide technical and policy support in addressing systemic and structural issues relating to sexual harassment and misconduct; and
- f) contribute to research, monitoring, and policy review processes.

Counselling and Career Development Directorate (CCD)

The **Counselling and Career Development Directorate (CCD)** shall be responsible for providing psychosocial and support services.

The CCD shall:

- a) provide counselling and psychological support to victims, complainants, respondents, and other affected persons where appropriate;
- b) support trauma-informed interventions and recovery processes;
- c) assist in designing and implementing support mechanisms, including referrals to external services where necessary;
- d) collaborate with the Committee and other units to provide holistic care; and
- e) maintain confidentiality and professional standards in the delivery of support services.

Anti-Sexual Harassment Committee

There is hereby established an **Anti-Sexual Harassment Committee** (hereinafter referred to as “the Committee”), which shall be the primary body responsible for the implementation of this Policy.

Functions of the Committee

The Committee shall:

- a) receive, assess, investigate, hear, and determine complaints of sexual harassment and misconduct;
- b) ensure that all complaints are handled fairly, promptly, and in accordance with due process;
- c) recommend appropriate sanctions and remedial measures;

- d) design and implement education and training programmes on sexual harassment and misconduct;
- e) disseminate this Policy and promote awareness within the University Community;
- f) maintain records of complaints, investigations, and outcomes;
- g) monitor compliance with this Policy; and
- h) prepare and submit periodic and annual reports to the Vice-Chancellor and/or the University Council.

Composition of the Committee

The Committee shall be composed of members drawn from the University Community and relevant expertise areas, including:

- a) representatives from academic units;
- b) representatives from administrative and staff bodies;
- c) representatives of student bodies (undergraduate and graduate);
- d) representatives from relevant specialised units, including gender studies, counselling, and public health;
- e) legal practitioners within the University; and
- f) such external members or technical advisers as may be necessary.

The detailed composition may be set out in an Annex to this Policy.

Gender Balance

The University shall take all reasonable steps to ensure **gender balance** in the composition of the Committee.

Gender parity shall be pursued as a guiding objective, and diversity considerations shall be taken into account to ensure inclusiveness and representativeness.

Appointment

Members of the Committee shall be appointed by the Vice-Chancellor in accordance with established University procedures.

In making appointments, regard shall be had to:

- a) competence;
- b) integrity;
- c) gender sensitivity;
- d) experience in handling sensitive matters; and
- e) ability to discharge functions impartially.

Qualification and Tenure

Members of the Committee shall:

- a) possess demonstrable credibility, integrity, and professionalism;
- b) have appropriate knowledge, training, or experience relevant to the work of the Committee;
- c) serve for a term of **two (2) years**, renewable for one additional term only; and
- d) be eligible for training and capacity development as may be required.

Leadership of the Committee

- a) The Vice-Chancellor shall appoint a **Chairperson**, preferably a person of high standing and experience.
- b) The Committee shall appoint a **Vice-Chairperson** from among its members, who shall act in the absence of the Chairperson.
- c) The Chairperson shall:
 - convene meetings;
 - oversee investigations and proceedings;
 - ensure fairness and integrity of processes; and
 - provide leadership to the Committee.

Secretariat and Administrative Support

- a) The Vice-Chancellor shall appoint a **Secretary** and, where necessary, an **Assistant Secretary** to the Committee.
- b) The Secretariat shall:
 - maintain records of proceedings;
 - manage documentation and communications;
 - provide logistical and administrative support; and
 - ensure proper documentation and archiving of all matters.

Adjudication Panel

- a) The Committee may constitute an **Adjudication Panel** from among its members to hear and determine specific cases.
- b) An Adjudication Panel shall:
 - consist of an odd number of members, including at least one legally trained person;
 - observe gender balance as far as practicable;
 - act impartially and independently in determining cases.
- c) The Panel shall report its findings and recommendations to the full Committee or directly to the Vice-Chancellor as may be required.

Conflict of Interest

- a) Any member of the Committee or Panel who has a conflict of interest in a matter shall disclose the conflict promptly.
- b) Such member shall recuse themselves from all proceedings relating to that matter.
- c) Failure to disclose a conflict may constitute misconduct and undermine the validity of proceedings.

Independence and Integrity

In performing its functions, the Committee shall:

- a) act independently and impartially;
- b) be free from undue influence, interference, or pressure;
- c) ensure fairness to all parties; and
- d) uphold the principles of natural justice.

Cooperation with the Committee

All members of the University Community shall:

- a) cooperate with the Committee in the performance of its functions;
- b) provide information, documents, and evidence where required;
- c) attend proceedings when duly requested.

Failure to cooperate or attempts to obstruct proceedings may constitute a disciplinary offence.

Reporting Obligations

The Committee shall:

- a) notify the Vice-Chancellor of significant complaints and investigations;
- b) submit periodic reports on its activities;
- c) prepare an **annual report** containing anonymised data, trends, and recommendations; and
- d) contribute to institutional learning and policy improvement.

Review of Institutional Framework

The institutional arrangements under this Policy shall be reviewed periodically to ensure:

- a) effectiveness;
- b) efficiency;
- c) accessibility; and
- d) alignment with best practices.

REPORTING AND COMPLAINT MECHANISMS

This Part establishes the framework for the reporting, receipt, and initiation of complaints relating to sexual harassment and misconduct. It is designed to ensure accessibility, responsiveness, fairness, and protection for all persons involved.

General Right to Report

Any person who experiences, witnesses, or becomes aware of conduct that may constitute sexual harassment or sexual misconduct has the right to report such conduct under this Policy.

The University shall ensure that reporting mechanisms are:

- a) accessible;
- b) safe and confidential;
- c) responsive and timely; and
- d) sensitive to the needs of victims and complainants.

Who May Report

A report may be made by:

- a) a Victim;
- b) a Complainant acting on their own behalf;
- c) a third party with knowledge of the incident;
- d) a member of staff or student who becomes aware of misconduct;
- e) a University authority, officer, or unit acting in the course of duty.

Who May Complain

A formal complaint may be made by:

a Victim;

- a) a person authorised to act on behalf of a Victim, including in cases of incapacity or vulnerability;
- b) in appropriate cases, a third party where the circumstances justify institutional intervention.

The Committee may, in exceptional cases, initiate proceedings on its own motion where:

- the conduct is serious; or
- there is a risk to the safety of the University Community.

Forms of Reporting

Reporting under this Policy may take any of the following forms:

Direct Complaints

A **Direct Complaint** is a formal complaint made by a Complainant to the Committee.

Such complaints shall:

- a) be made orally or in writing
- b) be reduced into writing where initially made orally;
- c) contain sufficient details of the alleged conduct, including, where possible, dates, locations, and persons involved.

Where a Complainant is unable to prepare a written complaint, the Committee shall provide assistance.

Third-Party Reports

A **Third-Party Report** may be made by any person who becomes aware of sexual harassment or misconduct.

In such cases:

- a) the report shall be communicated to the Committee;
- b) the consent and safety of the Victim shall be considered before proceeding;
- c) the Committee may conduct a preliminary assessment to determine appropriate action.

Anonymous Information

The University may receive **anonymous reports or information**.

Where such information is received:

- a) the Committee may assess the credibility and seriousness of the information;
- b) appropriate preventive or protective measures may be taken;
- c) a formal investigation may be initiated where sufficient information exists.

Anonymous reporting shall not, by itself, preclude action where risks are identified.

Reporting Channels

Reports and complaints may be made through one or more of the following channels:

- a) the Anti-Sexual Harassment Committee;

- b) designated officers or representatives of the Committee;
- c) CEGENSA or the Sexual Harassment Crisis Centre;
- d) the Counselling and Career Development Directorate (CCD);
- e) heads of departments, units, schools, or colleges;
- f) official University communication platforms, including secure online reporting systems where available.

All University officers receiving reports shall:

- treat the matter confidentially; and
- promptly refer the report to the Committee.

Informal Resolution Mechanisms

A Complainant may, where appropriate, choose to pursue an **informal resolution process**, including:

- a. directly communicating to the Respondent that the conduct is unwelcome;
- b. requesting intervention by a trusted third party;
- c. mediation facilitated by the Committee.

Conditions for Informal Resolution

Informal resolution shall:

- be voluntary for all parties;
- not be used in cases involving serious misconduct (e.g., sexual assault);
- not preclude the right to pursue a formal complaint.

Where informal resolution fails or is inappropriate, the Complainant shall be advised to proceed with a formal complaint.

Formal Complaint Procedure

Where a formal complaint is initiated:

- a) the complaint shall be submitted to the Committee;
- b) the Committee shall acknowledge receipt promptly;
- c) the Respondent shall be notified of the complaint;
- d) the Respondent shall be invited to submit a written response within a specified period;
- e) the matter shall proceed to preliminary assessment and, where appropriate, full investigation.

Timelines for Reporting

General Rule

Complaints should be made **as soon as reasonably possible** after the alleged conduct.

Rationale

Timely reporting:

- facilitates effective investigation;
- preserves evidence;
- enhances institutional response.

Late Reporting in Exceptional Cases

The Committee may accept complaints outside the standard reporting period where:

- a. the delay is justified by trauma, fear, incapacity, or other compelling reasons;
- b. the conduct is serious;
- c. there is ongoing risk to the University Community.

In such cases, the Committee may:

- extend the reporting period;
- document reasons for the extension;
- proceed with appropriate safeguards.

Complaints Involving Former Members

The University shall retain jurisdiction over complaints involving **Former Members** where:

- a) the alleged conduct occurred during their period of association with the University; or
- b) the effects of the conduct persist within the University environment.

In such cases:

- a) the Committee may notify and invite the Former Member to respond;
- b) the University may impose appropriate sanctions, including:
 - revocation of awards or honours;
 - withholding of certificates or records;
 - public or institutional findings;
- (c) the University may notify relevant external bodies or authorities where appropriate.

Rights of the Complainant

A Complainant shall have the right to:

- a) be treated with dignity, respect, and sensitivity;
- b) access reporting and support mechanisms;
- c) be informed of procedures and progress;
- d) be protected from retaliation;
- e) receive reasonable accommodations;
- f) withdraw a complaint, subject to institutional considerations.

Rights of the Respondent

A Respondent shall have the right to:

- a. be informed of the allegations;
- b. be presumed not responsible until a determination is made;
- c. respond to the complaint;
- d. participate in proceedings;
- e. be treated fairly and without bias.

Right to Representation

A Complainant and Respondent may be represented by a lawyer or other authorised representative.

Such representation shall:

- not obstruct proceedings;
- be subject to procedural rules of the Committee.

Duty to Cooperate

All members of the University Community shall:

- a) cooperate with reporting and investigation processes;
- b) provide truthful information;
- c) refrain from obstructing proceedings.

Failure to cooperate may result in disciplinary action.

Protection Against Retaliation

The University shall take immediate steps to prevent and address retaliation.

Any report of retaliation shall:

- a) be treated as a separate complaint;
- b) be investigated promptly;
- c) attract appropriate sanctions where established.

Confidentiality in Reporting

All reports and complaints shall be handled with strict confidentiality.

Confidentiality may be limited only where:

- a) necessary for investigation or adjudication;
- b) required by law;
- c) necessary to protect persons or the University Community

This Part establishes the framework for **urgent, interim, and ongoing measures** to protect the safety, dignity, wellbeing, and rights of persons affected by sexual harassment and misconduct.

These measures are **preventive and protective in nature** and shall not be construed as a determination of responsibility.

General Principles

In implementing protective and support measures, the University shall be guided by the following principles:

- a. **safety and wellbeing** of affected persons shall be prioritised;
- b. measures shall be **timely, proportionate, and responsive** to the circumstances;
- c. measures shall be **non-punitive** and not prejudice the outcome of any investigation;
- d. the dignity, privacy, and autonomy of affected persons shall be respected;
- e. both Complainants and Respondents may, where appropriate, benefit from protective measures.

Trigger for Protective Measures

Protective and support measures may be implemented:

- a. upon receipt of a report or complaint;
- b. during preliminary assessment;
- c. during investigation or adjudication;
- d. after a determination, pending appeal or implementation.

Such measures may be initiated:

- at the request of a Complainant or Victim; or
- by the Committee on its own initiative where risk is identified.

Safety Measures

The University shall take appropriate **safety measures** to protect persons from harm or further exposure to risk.

These may include:

- a) ensuring physical separation between parties;
- b) securing safe accommodation or relocation where necessary;
- c) providing campus security support;
- d) restricting access to specific areas or facilities;
- e) coordinating with relevant authorities in high-risk situations.

No-Contact Directives

The Committee may issue a **No-Contact Directive** requiring one or both parties to refrain from:

- a) direct communication (verbal, written, or electronic);
- b) indirect communication through third parties;
- c) approaching or being within a specified proximity of the other party.

A No-Contact Directive shall:

- be communicated clearly and in writing;
- specify its scope and duration;
- be enforceable through disciplinary measures in case of breach.

Academic and Workplace Accommodations

The University shall provide **reasonable accommodations** to minimise disruption to academic or professional activities.

Such accommodations may include:

Academic Adjustments

- a) extension of deadlines;
- b) deferment of examinations or assessments;
- c) change of class, course, or programme;
- d) alternative supervision or evaluation arrangements.

Workplace Adjustments

- a) reassignment of duties;
- b) change of reporting lines;
- c) modification of work schedules;
- d) temporary leave or remote work arrangements.

All accommodations shall be:

- reasonable;
- proportionate;
- implemented without undue prejudice to either party.

Counselling and Psychosocial Support

The University shall ensure access to counselling and psychosocial support services through the Counselling and Career Development Directorate (CCD) and other appropriate providers.

Support services may include:

- a) individual counselling sessions;
- b) trauma-informed care;
- c) crisis intervention;
- d) referral to external medical or psychological services;
- e) ongoing emotional and mental health support.

Such services shall:

- be confidential;
- be voluntary;
- be delivered by qualified professionals.

Protection Against Retaliation

The University shall take proactive steps to **prevent and address retaliation**.

This includes:

- a) monitoring interactions between parties;
- b) responding promptly to reports of retaliation;
- c) implementing additional protective measures where necessary;
- d) taking disciplinary action against persons who engage in retaliation.

Confidentiality Safeguards

The University shall implement **strict confidentiality safeguards** in relation to protective measures.

This includes:

- a) limiting disclosure of information to persons with a need to know;
- b) securing records and communications;
- c) ensuring that support services maintain professional confidentiality;
- d) protecting the identity of affected persons where possible.

Confidentiality shall be balanced with:

- the need to investigate;
- legal obligations;
- safety considerations.

Interim Measures Affecting Respondent

Where necessary to protect persons or preserve the integrity of the process, interim measures may be applied to a Respondent, including:

- a) temporary suspension from academic or employment duties;
- b) restriction from specific facilities or activities;
- c) reassignment or administrative leave;
- d) supervision or monitoring arrangements.

Such measures shall:

- be proportionate to the risk identified;
- be subject to review;
- not constitute a disciplinary sanction.

Monitoring and Review of Measures

All protective and support measures shall be:

- a) subject to periodic review by the Committee;
- b) modified or withdrawn as circumstances change;
- c) documented and communicated appropriately.

The Committee shall ensure that measures remain:

- effective;
- fair;
- responsive to evolving needs.

Coordination of Support Services

The Committee shall coordinate with:

- a) CEGENSA;
- b) the Counselling and Career Development Directorate;
- c) relevant academic or administrative units;
- d) security services;
- e) external service providers where necessary.

This coordination is intended to ensure a **holistic and integrated response**.

Non-Exclusivity of Measures

The protective and support measures listed in this Part are **not exhaustive**.

The University may adopt any additional measures reasonably necessary to:

- a) protect affected persons;
- b) maintain institutional order;
- c) preserve the integrity of proceedings.

INVESTIGATION AND ADJUDICATION PROCEDURE

This Part sets out the formal procedures governing the **investigation, hearing, and determination** of complaints under this Policy. These procedures shall be conducted in accordance with the principles of **fair hearing, natural justice, procedural integrity, and timeliness**.

Preliminary Assessment

Upon receipt of a formal complaint, the Committee shall conduct a **preliminary assessment** to determine:

- a) whether the complaint falls within the scope of this Policy;
- b) whether there is sufficient information to proceed;
- c) whether interim protective measures are required;
- d) whether the matter may be resolved informally (where appropriate); or
- e) whether the matter should proceed to formal investigation.

The preliminary assessment shall not involve a determination of responsibility.

Notice to Respondent

Where a complaint proceeds, the Committee shall issue a **written notice** to the Respondent, which shall:

- a) set out the allegations in sufficient detail;
- b) identify the relevant provisions of the Policy;
- c) inform the Respondent of their rights and obligations;
- d) specify the timeline for response; and
- e) indicate any interim measures in place.

Notice shall be served in a manner that ensures receipt and confidentiality.

Written Response

The Respondent shall be required to submit a **written response** within a specified period (ordinarily within seven (7) days).

Where the Respondent is unable to provide a written response:

- assistance may be provided by the Committee;
- an oral response may be recorded and reduced into writing.

Failure to respond shall not prevent the continuation of proceedings.

Evidence

The Committee or Adjudication Panel shall receive and consider all **relevant and admissible evidence**, including:

- a) written statements of the Complainant and Respondent;
- b) witness statements;
- c) documentary evidence;
- d) audio-visual materials;
- e) electronic communications (emails, messages, digital records);
- f) expert or technical evidence where necessary;
- g) medical or forensic evidence where appropriate.

The Committee may determine the weight and relevance of evidence in a flexible and context-sensitive manner.

Witnesses

- a) The Committee may call and hear **witnesses** presented by either party or identified independently.
- b) Witnesses may:
 - provide written statements;
 - give oral testimony during hearings.
- c) The Committee shall take reasonable steps to protect witnesses from intimidation or retaliation.

Hearings

Where necessary, the Adjudication Panel shall conduct a **hearing** to determine the complaint.

Nature of Hearings

- a) hearings shall be conducted in a fair, respectful, and controlled manner;
- b) hearings may be conducted in person or through secure virtual means;
- c) hearings shall be private and confidential.

Order of Proceedings

- a) the Complainant shall present their case first;
- b) the Respondent shall then present their response;
- c) witnesses may be called;
- d) the Panel may ask questions at any stage.

Manner of Questioning and Cross-Examination

- a) Parties shall have the opportunity to question each other's accounts, subject to control by the Panel.
- b) Questioning shall:
 - be conducted respectfully;
 - avoid intimidation, harassment, or re-traumatisation;
 - be moderated by the Panel where necessary.
- c) Legal representatives may be present but shall not unduly dominate proceedings.

Record of Proceedings

The Adjudication Panel shall maintain a **comprehensive record of proceedings**, including:

- a) the allegations and issues for determination;
- b) summaries of evidence presented;
- c) findings of fact;
- d) reasoning and conclusions;
- e) any dissenting opinions.

Such records shall:

- be securely stored;
- be treated as confidential;
- form part of the institutional record.

Standard of Proof

The standard of proof in proceedings under this Policy shall be the **balance of probabilities**.

A finding shall be made where it is more likely than not that the alleged conduct occurred.

Timeline for Completion

- a) Investigations and adjudication shall be completed **as promptly as possible**, and ordinarily within **sixty (60) working days** from the date of formal complaint.

- b) Where this timeline cannot be met:
 - the Committee shall seek an extension;
 - reasons for delay shall be documented.

Timeliness shall be balanced with fairness and thoroughness.

Non-Participation by Respondent

Where a Respondent:

- a) fails to respond to a complaint; or
- b) refuses to participate in proceedings,

the Committee or Panel may:

- proceed in their absence;
- determine the matter based on available evidence.

Non-participation shall not invalidate proceedings.

Withdrawal of Complaint

- a) A Complainant may withdraw a complaint at any stage.
- b) Withdrawal shall:
 - be made in writing;
 - state the reasons for withdrawal.
- c) Notwithstanding withdrawal, the Committee may continue proceedings where:
 - the conduct is serious; or
 - there is a broader institutional risk.

Complaints Against Committee Members

Where a complaint involves a member of the Committee:

- a) that member shall be excluded from all related proceedings;
- b) alternative arrangements shall be made to ensure impartiality;
- c) the integrity of the process shall be preserved.

Conflict of Interest in Proceedings

- a) All persons involved in investigation or adjudication shall disclose any conflict of interest.
- b) A person with a conflict shall:

- recuse themselves;
- take no further part in the matter.

Powers of the Committee and Panel

In the conduct of proceedings, the Committee or Panel may:

- a) request documents, records, or information;
- b) summon parties or witnesses;
- c) seek expert advice;
- d) conduct independent inquiries;
- e) determine procedural matters.

Confidentiality of Proceedings

All proceedings under this Part shall be **strictly confidential**.

Participants shall:

- a) respect confidentiality obligations;
- b) not disclose information without authorisation.

Confidentiality shall be subject to:

- legal requirements;
- safety considerations;
- implementation needs.

Fair Hearing and Natural Justice

The Committee and Panel shall ensure:

- a) both parties are heard;
- b) decisions are based on evidence;
- c) proceedings are free from bias;
- d) reasons are provided for decisions.

Referral to External Authorities

Where the conduct may constitute a criminal offence or professional misconduct:

- a) the University may refer the matter to law enforcement or relevant authorities;
- b) internal proceedings may continue independently.

FINDINGS, SANCTIONS, AND APPEALS

This Part provides for the **determination of responsibility**, the **imposition of sanctions**, and the **right of appeal**, ensuring accountability, fairness, and institutional integrity.

Findings

After the conclusion of investigation and adjudication, the Adjudication Panel shall make a **finding** as to whether the Respondent is responsible for the alleged conduct.

The finding shall:

- a) be based on the **balance of probabilities**;
- b) be supported by reasons and evidence;
- c) address each material allegation;
- d) indicate whether the conduct constitutes a violation of this Policy.

Where appropriate, the Panel may also make **ancillary findings**, including:

- patterns of behaviour;
- abuse of authority;
- aggravating or mitigating circumstances.

The findings shall be formally recorded and communicated to the Committee and the Vice-Chancellor.

Factors Relevant to Sanction

In determining appropriate sanctions, the Committee shall consider:

- a) the **nature and severity** of the conduct;
- b) the **impact on the Complainant or Victim**;
- c) whether the conduct involved **coercion, intimidation, or abuse of power**;
- d) whether the conduct was **repeated or part of a pattern**;
- e) the **vulnerability** of the affected person;
- f) the presence of **aggravating factors**, including retaliation or premeditation;
- g) the presence of **mitigating factors**, including remorse or cooperation;
- h) the need for **deterrence, accountability, and rehabilitation**;
- i) the need to **protect the University Community** and maintain institutional integrity.

Range of Sanctions

Where a violation is established, the University may impose one or more of the following sanctions:

Administrative and Educational Sanctions

- a) formal written warning;
- b) formal written apology;

- c) mandatory participation in counselling, education, or training programmes;
- d) periodic assessments or monitoring.

Restrictive Measures

- a) issuance of a no-contact directive;
- b) restriction of access to specific facilities, activities, or services;
- c) removal from supervisory, teaching, or leadership roles;
- d) withdrawal of privileges or responsibilities.

Academic or Employment Sanctions

- a) suspension from academic or employment duties;
- b) reassignment or demotion;
- c) termination of employment;
- d) expulsion from the University.

Institutional and Reputational Sanctions

- a) revocation of degrees, certificates, awards, or honours;
- b) withholding of transcripts or official documentation;
- c) removal from University records of distinction or recognition.

External Referral

- a) referral to law enforcement authorities;
- b) notification to professional or regulatory bodies;
- c) communication with external employers or institutions where appropriate.

Sanctions shall be:

- proportionate;
- consistent;
- reasoned and documented.

Interim Measures Pending Outcome

At any stage before final determination, the Committee may recommend **interim measures**, including:

- a) temporary suspension;
- b) reassignment of duties;
- c) restriction of access;
- d) any other measure necessary to protect persons or the process.

Such measures:

- are precautionary;
- do not constitute a finding of responsibility.

Final Decision by Appropriate Authority

- a) The findings and recommended sanctions shall be submitted to the **Vice-Chancellor** (or appropriate disciplinary authority) for confirmation and implementation.
- b) The final decision shall:
 - adopt, vary, or reject the recommendations;
 - be communicated to the parties in writing;
 - include reasons where appropriate.
- c) The decision shall take effect upon communication, subject to any appeal.

Implementation and Monitoring

The University shall ensure that:

- a) sanctions are **implemented promptly and effectively**;
- b) compliance with sanctions is **monitored**;
- c) additional measures are taken where necessary to enforce compliance;
- d) records of sanctions are maintained securely.

Failure to comply with imposed sanctions may result in further disciplinary action.

Publication of Outcomes

Where appropriate, the University may publish or disclose outcomes of cases:

- a) to promote accountability and transparency;
- b) to deter misconduct;
- c) to inform the University Community.

Publication may include:

- anonymised summaries; or
- identified outcomes in serious cases, subject to fairness and legal considerations.

Where a Respondent is exonerated, the University may also publish such outcome to restore reputation.

Sexual Harassment Offender Register

The University may maintain a **Sexual Harassment Offender Register** or equivalent record containing:

- a) names and details of persons found responsible;
- b) sanctions imposed;
- c) relevant case information.

Access to such records shall be:

- controlled;
- subject to legal and institutional safeguards.

Appeals

Right of Appeal

A Complainant or Respondent who is dissatisfied with the outcome shall have the right to **appeal**.

Grounds for Appeal

An appeal may be made on one or more of the following grounds:

- a) procedural irregularity affecting the outcome;
- b) new evidence not reasonably available at the time of the hearing;
- c) error in the application or interpretation of the Policy;
- d) disproportionate or inappropriate sanction.

Appeal Body

Appeals shall be made to the **University Appeals Board** or other designated authority in accordance with University Statutes.

Procedure

- a) the appeal shall be filed within the prescribed time;
- b) the appeal shall state the grounds clearly;
- c) the Appeals Body shall review the record and may:
 - uphold the decision;
 - vary the decision;
 - set aside the decision and remit the matter for reconsideration.

Finality of Decisions

Subject to the right of appeal, decisions under this Policy shall be **final and binding** within the University.

Consistency and Fairness

The University shall ensure that:

- a) sanctions are applied consistently across similar cases;
- b) decisions are guided by established principles;
- c) fairness and proportionality are maintained.

PREVENTION, EDUCATION, AND POLICY PROMOTION

This Part establishes a comprehensive framework for **prevention, education, awareness, and institutional culture-building** aimed at eliminating sexual harassment and misconduct within the University.

General Duty of Prevention

The University shall adopt proactive and sustained measures to:

- a) prevent the occurrence of sexual harassment and misconduct;
- b) promote a culture of dignity, respect, and accountability;
- c) ensure that all members of the University Community understand their rights and obligations under this Policy.

Prevention shall be treated as a **core institutional responsibility**, not merely a reactive function.

Dissemination of Policy

The University shall ensure the **wide dissemination** of this Policy to all members of the University Community.

This shall include:

- a) publication on the University's official website;
- b) distribution during student and staff orientation programmes;
- c) availability in printed and electronic formats;
- d) display in visible and accessible locations across campuses, including lecture halls, offices, hostels, and common areas;
- e) circulation through institutional communication platforms.

The Policy shall be made available without charge.

Orientation Programmes

The University shall integrate education on sexual harassment and misconduct into **orientation programmes** for:

- a) newly admitted students;
- b) newly recruited staff and faculty;
- c) visiting scholars, affiliates, and other relevant persons.

Orientation shall cover:

- definitions and examples of prohibited conduct;
- reporting mechanisms;
- rights and responsibilities under the Policy;
- consequences of violations.

Mandatory Training

The University shall establish **mandatory training programmes** for all members of the University Community.

Scope of Training

Training shall include:

- a) awareness of sexual harassment and misconduct;
- b) understanding consent and power dynamics;
- c) bystander intervention strategies;
- d) reporting procedures and institutional processes;
- e) prevention of retaliation and victimisation.

Mandatory Nature

- a) completion of training may be required for:
 - student registration or progression;
 - staff confirmation or promotion;
 - appointment to leadership or supervisory roles.
- b) failure to complete mandatory training may result in administrative consequences.

Leadership and Staff Development

The University shall provide **specialised training and capacity development** for:

- (a) members of the Anti-Sexual Harassment Committee;
- (b) University leadership and management;
- (c) academic and administrative staff;
- (d) persons responsible for receiving or handling complaints.

Such training shall focus on:

- trauma-informed approaches;
- gender sensitivity;
- investigative and adjudicative skills;
- confidentiality and ethical handling of cases.

Online Training and Assessment

The University shall leverage **digital platforms** to enhance accessibility and participation.

This shall include:

- a) online training modules;
- b) periodic assessments to evaluate understanding;
- c) certification upon completion;

- d) integration with University learning management systems.

Online training shall:

- complement in-person training;
- be regularly updated;
- be accessible to all members of the University Community.

Awareness and Advocacy Campaigns

The University shall conduct continuous **awareness and advocacy campaigns**, including:

- a) seminars, workshops, and public lectures;
- b) media campaigns and informational materials;
- c) collaboration with student bodies and staff associations;
- d) commemorative events and thematic initiatives.

Such campaigns shall aim to:

- challenge harmful norms and behaviours;
- promote respect and inclusion;
- encourage reporting and support-seeking.

Role of CEGENSA and Other Units

CEGENSA, in collaboration with the Committee and other units, shall:

- (a) lead advocacy and awareness initiatives;
- (b) develop educational materials and programmes;
- (c) support research and data-driven interventions;
- (d) promote gender equality and institutional reform.

Other relevant units shall support these efforts as part of a **coordinated institutional approach**.

Integration into Institutional Frameworks

The University shall ensure that the principles of this Policy are **mainstreamed** into:

- a) academic programmes and curricula where appropriate;
- b) staff development and performance systems;
- c) student codes of conduct and handbooks;
- d) employment policies and conditions of service;
- e) strategic plans and institutional policies.

Periodic Review of Policy

The University shall conduct **periodic review** of this Policy to ensure:

- a) effectiveness in preventing and addressing misconduct;
- b) alignment with legal and institutional developments;
- c) incorporation of best practices and emerging trends.

Review Cycle

This Policy shall be reviewed at least **every five (5) years**, or earlier where necessary.

Continuous Improvement

The University shall adopt a **continuous improvement approach**, including:

- a) learning from past cases and institutional experience;
- b) analysing trends and patterns;
- c) updating training and procedures;
- d) strengthening institutional capacity.

Responsibility of Members of the University Community

All members of the University Community shall:

- a) participate in prevention and education programmes;
- b) uphold the values of this Policy;
- c) contribute to a safe and respectful environment;
- d) report misconduct and support affected persons.

RECORDS, MONITORING, AND REVIEW

Record-Keeping

The University shall maintain **comprehensive and accurate records** of all matters arising under this Policy.

Records shall include:

- a) complaints and reports received;
- b) preliminary assessments conducted;
- c) investigation and adjudication proceedings;
- d) evidence and documentation submitted;
- e) findings, decisions, and sanctions imposed;
- f) protective and support measures implemented;
- g) appeals and their outcomes.

Such records shall:

- be securely stored;

- be accessible only to authorised persons;
- be retained for a period consistent with University policy and applicable law.

Data Protection and Confidential Handling

All records and information under this Policy shall be handled in accordance with strict data protection and confidentiality standards.

The University shall ensure:

- a) protection of personal and sensitive data;
- b) restricted access on a “need-to-know” basis;
- c) secure storage (physical and digital);
- d) safeguards against unauthorised disclosure.

Confidentiality obligations apply to:

- Committee members;
- administrative staff;
- parties to proceedings;
- all persons involved in implementation.

Disclosure of information shall only occur where:

- a) required for investigation or adjudication;
- b) necessary to implement protective or disciplinary measures;
- c) required by law; or
- d) necessary to protect safety or institutional integrity.

Annual Reporting (Anonymised)

The Committee shall prepare and submit an annual report to the Vice-Chancellor and/or the University Council.

The report shall include:

- a) the number and nature of complaints received;
- b) trends and patterns identified;
- c) actions taken and outcomes achieved;
- d) effectiveness of preventive measures;
- e) recommendations for policy or institutional improvement.

All reports shall:

- be anonymised to protect confidentiality;
- be used for institutional learning and policy development;
- support transparency and accountability.

Monitoring and Evaluation

The University shall establish mechanisms for **continuous monitoring and evaluation** of this Policy.

This shall include:

- a) periodic assessment of implementation effectiveness;
- b) evaluation of reporting and response systems;
- c) review of timelines and procedural efficiency;
- d) feedback from stakeholders, including students and staff;
- e) benchmarking against best practices.

Monitoring shall aim to:

- identify gaps and challenges;
- improve institutional response;
- strengthen prevention strategies.

Review and Amendment of Policy

Periodic Review

This Policy shall be subject to **periodic review**, at least once every **five (5) years**, or earlier where necessary.

Grounds for Review

A review may be initiated where:

- a) there are significant legal or regulatory changes;
- b) institutional experience reveals gaps or inefficiencies;
- c) new forms of misconduct emerge (e.g., technological developments);
- d) recommendations arise from annual reports or audits.

Amendment Process

Amendments to this Policy shall:

- a) be proposed through appropriate institutional channels;
- b) undergo consultation with relevant stakeholders;
- c) be approved by the University Council or designated authority;
- d) be communicated widely upon adoption.

Version Control and Change History

The University shall maintain a **Version Control and Change History Register** for this Policy.

This shall include:

- a) version number;
- b) date of adoption or amendment;
- c) effective date;
- d) approving authority;
- e) summary of changes.

This ensures:

- transparency in policy development;
- traceability of amendments;
- institutional continuity.

Institutional Learning and Policy Development

The University shall utilise data and experience from implementation to:

- a) improve procedures and processes;
- b) enhance training and awareness programmes;
- c) inform strategic planning;
- d) strengthen institutional culture.

Annexes

The following Annexes form an integral part of this Policy and provide **operational, illustrative, and procedural guidance**:

Annex I: Illustrative Examples of Prohibited Conduct

This Annex shall provide detailed, non-exhaustive examples of conduct that may constitute sexual harassment or misconduct, including:

- verbal, non-verbal, physical, and digital behaviours;
- workplace and academic scenarios;
- severe forms such as sexual assault and exploitation.

Annex II: Composition Template for the Committee

This Annex shall set out:

- detailed membership structure;
- representation from relevant units and groups;
- criteria for selection;
- guidelines for gender balance and diversity.

Annex III: Complaint Form and Reporting Template

This Annex shall include:

- standardised complaint forms;
- guidance for reporting;
- required information fields;
- assistance procedures for persons unable to complete forms.

Annex IV: Procedure Flowchart

This Annex shall provide a **visual representation** of:

- reporting pathways;
- investigation stages;
- adjudication process;
- appeal mechanisms.

This enhances accessibility and understanding of procedures.

Annex V: Sanctions Matrix or Indicative Outcomes

This Annex shall provide:

- a structured matrix linking types of misconduct to indicative sanctions;
- guidance on proportionality and consistency;
- illustrative scenarios.

Status of Annexes

The Annexes:

- a) form part of this Policy;
- b) may be updated periodically without requiring full amendment of the Policy;
- c) shall be consistent with the main provisions of the Policy.

Effective Date

This Policy shall come into force on the date approved by the University Council and duly assented to by the Chairperson of the University Council, or on such other date as may be expressly stated in the instrument of approval issued by the University Council

From the effective date, all persons and offices to whom this Policy applies shall be bound by it and shall take such steps as are necessary to ensure compliance, dissemination, implementation, and enforcement.

Repeals and Savings

Repeal

The previous Sexual Harassment and Misconduct Policy (2017) and any prior equivalent policy instrument governing substantially the same subject matter are hereby repealed upon the coming into force of this Policy.

Savings

- a) Despite the repeal of the previous policy:
any notice, direction, order, instruction, decision, recommendation, appointment, or administrative act lawfully made or done under the repealed policy, and not inconsistent with this Policy, shall continue to have effect as if made or done under this Policy until reviewed, replaced, revoked, completed, or otherwise lawfully terminated;

- b) any complaint, report, inquiry, investigation, hearing, recommendation, sanction, appeal, or other process commenced under the repealed policy before the effective date of this Policy may, where appropriate and lawful, continue and be concluded under this Policy or under the repealed Sexual Harassment and Misconduct Policy (2017);
- c) any committee, officer, or unit established or designated under the repealed policy shall continue in function, insofar as consistent with this Policy, until reconstituted, redesignated, or replaced under this Policy; and
- d) any right, obligation, liability, or disciplinary consequence accrued or incurred under the repealed policy prior to the commencement of this Policy shall not be invalidated solely by reason of the repeal.

Transitional Interpretation

Where any difficulty arises in the transition from the repealed policy to this Policy, the Vice-Chancellor, acting in consultation with the relevant University authorities and subject to the University's governing instruments, may issue administrative directions to ensure continuity, fairness, and orderly implementation.

Final Provision

This Policy shall be read as a comprehensive and integrated framework, and all Parts shall be interpreted harmoniously to achieve its objectives.

SIGNATORIES

This Policy shall be authenticated by the signatures of the Chairperson of Council, and the Vice-Chancellor of the University of Ghana.

Assented to in, 2026 under the hand of:

Madam Marietta Agyeiwaa Brew
Chairperson
University of Ghana Council

Professor Nana Aba Appiah Amfo
Vice-Chancellor
University of Ghana