



TMUC
THE MILLENNIUM
UNIVERSAL COLLEGE

SEXUAL HARASSMENT & BULLYING POLICY

1. Purpose

TMUC is committed to providing a safe, inclusive, and respectful learning and working environment, free from all forms of sexual harassment, bullying, intimidation, and discrimination. This policy outlines the definitions, scope, reporting mechanisms, and institutional response to such behavior, in accordance with applicable national laws and global best practices.

2. Definition of Sexual Harassment

For the purpose of this policy, sexual harassment refers to:

“Any unwelcome sexual advance, request for sexual favours, or other verbal, visual, written, or physical conduct of a sexual nature that interferes with a person’s academic or professional performance, or creates an intimidating, hostile, or offensive educational or work environment.”

This definition is aligned with the Protection Against Harassment of Women at the Workplace Act, 2010 and applies to all individuals and genders within the Higher Education Institution (HEI).

2.1 Scope

“Harassment” includes any unwelcome advance, request for favour, or other verbal, written, or physical conduct or demeaning attitude where:

- a) Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual’s participation in any activity at the HEI.
- b) Submission to or rejection of such conduct by an individual is used as a basis for academic or employment decisions affecting that individual.
- c) Such conduct has the purpose or effect of interfering with an individual’s academic or professional performance, or creating an intimidating, hostile, or offensive environment.

Harassment may be overt or subtle, and can range from verbal abuse or visual gestures to physical contact, including persistent and unwelcome flirting or sexually suggestive communication.

2.2 Illustrative Examples of Sexual Harassment

The following examples, though not exhaustive, illustrate conduct that constitutes sexual harassment:

- Unwanted physical contact or sexually suggestive gestures
- Inappropriate sexual jokes, messages, emails, or comments
- Demands or requests for sexual favours (explicit or implied)
- Threats, humiliation, or retaliation following refusal of such advances
- Circulation or display of sexually explicit or offensive material, including digital or online content

2.3 Prohibited Behaviours

The following behaviours are specifically prohibited under this policy. While not exhaustive, they provide clarity on acts falling within the definition above:

a) Especially Egregious Non-Consensual Acts:

Acts that constitute or attempt to constitute sexual assault or rape. These cases fall under national law and require engagement with law enforcement; however, the HEI bears responsibility to take preventive measures, offer immediate assistance, and implement interim protective actions.

b) Non-Consensual Contact:

Any intentional contact of a sexual nature with another person without consent.

c) Exploitation:

Violations of sexual privacy or taking sexual advantage of another without consent, such as recording, sharing, or viewing explicit images or information of another person without permission.

d) Other Pervasive or Severe Behaviours:

Unwelcome conduct that may not involve direct contact but is based on an individual's sex or gender, and is persistent or highly offensive, creating a hostile or intimidating environment. Examples include lewd remarks, offensive sexual jokes, stalking, or inappropriate comments about someone's body or appearance.

e) Gender Discrimination:

Adverse or unequal treatment based on gender rather than merit, such as unequal pay, grades, opportunities, or disciplinary actions

2.4 Electronic and Digital Harassment

All actions defined as harassment under this policy apply equally to electronic communications, including conduct through the internet, social media, text messages, emails, telephone, or voicemail.

2.5 Gender Inclusivity

Harassment may be perpetrated by any person of any gender against another person of the same or different gender, and all such cases shall be considered under this policy without bias.

2.6 Abuse of Authority

Harassment is considered especially offensive when committed by individuals in a position of power or authority, particularly where submission is made a condition for academic, employment, or institutional benefit.

2.7 Impaired Consent

Harassment will be regarded as especially egregious if the perpetrator knew or reasonably should have known that the victim was in an impaired or incapacitated state. However, impairment of the accused (e.g., due to intoxication or illegal substances) shall not reduce responsibility under this policy.

3. Definition of Bullying

Bullying is defined as any repeated, unreasonable behaviour directed toward an individual or group that creates a risk to health, safety, or well-being. It includes:

- Verbal abuse, insults, or humiliation
 - Psychological intimidation, threats, or social exclusion
 - Spreading false information or rumors
 - Cyberbullying through digital platforms
 - Abuse of authority or power imbalance to harass, isolate, or control others
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4. Scope of the Policy

This policy applies to all members of the TMUC community, including students, faculty, staff, and other affiliated individuals, regardless of gender identity (male, female, or transgender). It extends to all individuals engaged in TMUC activities in any capacity, including:

- Students: Full-time, part-time, and distance learners
- Faculty: Permanent, visiting, and adjunct members
- Administrative and support staff
- Visitors, guests, contractors, service providers, and interns

This policy governs conduct occurring in the following contexts:

- a) On TMUC premises, including any campus, facility, or property owned, operated, or controlled by TMUC, or in its immediate vicinity;
- b) Off TMUC premises, where:
 - i. The conduct takes place in connection with a TMUC-recognized event, activity, or programme, such as study tours, internships, placements, field trips, or conferences; or
 - ii. The conduct creates or may reasonably be expected to create an intimidating, hostile, or unsafe environment that adversely affects the TMUC community; and
- c) Through TMUC's digital and online platforms, including official portals, forums, communication channels, social media spaces, and network systems—whether accessed on-campus or remotely.

5. Complaints and Reporting Mechanism

5.1 Filing a Complaint

Any person who has experienced harassment, as defined in this policy, may file a complaint with any member of the Inquiry Committee or through other official channels designated by TMUC.

5.2 External Reporting Option

If the incident falls within the scope of the Protection Against Harassment of Women at the Workplace Act, 2010 (as amended in 2022), the complainant retains the right to submit a case to the Ombudsperson, in accordance with the national legal framework

5.3 Indirect Reporting

If a complainant feels uncomfortable contacting a member of the Inquiry Committee directly, they may report the matter to a colleague, instructor, programme lead, Head of Department (HOD), Head of Institution (HOI), or the Dean.

It is the responsibility of the individual receiving the report to inform the Inquiry Committee (without revealing the identities of the complainant or alleged offender) and to seek procedural guidance for appropriate action.

5.4 Formal and Informal Channels

A complainant may choose to file either a formal or informal complaint at any stage.

Formal complaints can be made through a supervisor, Programme Nominee, QA representative, or directly to any member of the Inquiry Committee.

All recipients of such complaints are obligated to initiate the process promptly and must not conceal, delay, or obstruct the inquiry. This is in accordance with the **Protection Against Harassment of Women at the Workplace Act, 2010 (as amended in 2022)**.

5.5 Responsibility to Report

All members of the TMUC community are encouraged to report any instances of harassment they witness or become aware of to the Inquiry Committee.

TMUC retains the right and responsibility to initiate an investigation if it determines that a material violation of this policy has occurred, even in the absence of a formal complaint.

5.6 Reporting Timeline

Upon receiving a complaint or report, the designated resource person must forward it to the Inquiry Committee preferably within 24 hours to 15 days for review and action.

5.7 Informal Resolution (for Minor Violations)

For less severe incidents, a complainant may opt for an informal resolution through the Inquiry Committee.

The goal of this mechanism is early intervention and prevention—allowing for corrective dialogue or a formal warning to prevent escalation.

If the conduct reported under this channel is determined to constitute prohibited behaviour, the Inquiry Committee shall process it as a formal complaint.

6. Interim Measures and Special Arrangements

6.1 Immediate Actions

Upon receiving a complaint, the Inquiry Committee or any member of TMUC's administration shall assess the nature and seriousness of the case and take appropriate interim measures to safeguard the complainant and the campus environment.

If the complainant finds these measures inadequate, they may approach the Dean for further action.

Interim measures may include, but are not limited to:

- a)** Adjustments to class, teaching, or examination schedules (including for attendance at hearings);
- b)** Access to counselling or medical support services;
- c)** Temporary change in work or teaching assignments;
- d)** Arrangement for independent or neutral assessment where required;
- e)** Class rescheduling, withdrawal, or section change;
- f)** Notification to campus security or, in severe cases, law enforcement authorities;
- g)** Implementation of a no-contact or communication restriction between parties;
- h)** Change in office allocations;
- i)** Any other protective or remedial measures deemed appropriate by the Committee.

7. Inquiry Committee

7.1 Role and Responsibility

The Inquiry Committee shall be responsible for the investigation, review, and adjudication of all complaints related to harassment or misconduct under this policy.

- Upon receipt of a complaint, the Harassment Inquiry Committee (HIC) will initiate a confidential inquiry.
- Both complainant and respondent will be given a fair hearing.
- Evidence, witnesses, and relevant material will be reviewed.
- The inquiry must be concluded within 30 days, extendable under special circumstances

7.2 Composition

The Committee shall be constituted as follows:

- a) The Committee shall comprise three members, at least one of whom shall be a woman, and one shall be a member of TMUC's senior management.
 - b) All members shall be employees of TMUC, appointed by the Dean, following consultation with the Director of Quality Assurance and other senior administrative members.
- Members must be individuals of integrity, fairness, gender sensitivity, and professional credibility. They must be free from conflicts of interest and remain impartial throughout the proceedings.
 - The Dean shall appoint one member as Chairperson, whose duties include:
 - Maintaining order and due process during hearings;
 - Addressing procedural concerns and managing adjournments;
 - Ensuring accurate documentation of proceedings;
 - Preparing the Committee's final recommendations for submission to the Dean.
 - Should any complaint be established against a Committee member, that individual shall be immediately replaced and excluded from all ongoing inquiries.

8. Disciplinary Action

If the complaint is substantiated, possible sanctions include:

- Formal warning or written reprimand
 - Mandatory counseling or sensitivity training
 - Suspension from class or employment
 - Withholding of academic results or promotion
 - Expulsion from TMUC (in severe cases)
 - Termination of employment or contract
 - Referral to law enforcement where necessary
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9. Support and Protection

TMUC ensures:

- Protection from retaliation or victimization
- Access to psychological counseling and academic support
- Temporary academic/workplace adjustments, if needed
- Confidentiality of all parties involved

10. Training and Awareness

TMUC shall regularly:

- Conduct orientation sessions on harassment and bullying
- Train faculty, staff, and student leaders on reporting mechanisms
- Display posters, flyers, and policy briefs on campus and online platforms
- Promote a culture of mutual respect, equity, and accountability

11. Policy Review

This policy shall be reviewed annually by the TMUC Legal/HR Office or designated body to incorporate changes in law or institutional experience.

12. Legal Reference

- Protection Against Harassment of Women at the Workplace Act, 2010
- HEC Policy on Protection Against Sexual Harassment
- TMUC Student and Employee Code of Conduct

13. Contact Information

Harassment Inquiry Committee (HIC)

Email: HIC@tmuc.edu.pk

HR Department (for employee-related concerns)

Email: DHRD-tmuc@tmuc.edu.pk

Dean of Academics & Internationalization

Dean@tmuc.edu.pk
