



Anti-Harassment and Non-Discrimination Policy

Policy Title	Anti-Harassment and Non-Discrimination Policy
Policy Type	General
Policy Owner	All Staff
Policy Number	Human Resources/ 8
Pertinent Dates	Approved on: 9 April 2025 Revised on: Drafted on:

Introduction:

The British University in Egypt is committed to maintaining learning and working environments that are free from all forms of harassment and discrimination and accordingly adopts this Anti-Harassment and Non-Discrimination Policy (the “Policy”). Discrimination and harassment based on sex, gender, marital status, pregnancy, race, color, ethnicity, national origin, disability, religion, or expression, or any other protected characteristic under Egyptian law are prohibited. Our policy of non-discrimination in employment applies to recruitment, hiring, compensation, promotions, transfers, discipline, demotions, terminations, layoffs, access to benefits and training, and all other aspects of employment.

Purpose:

The University believes that respectful, professional conduct furthers the University’s mission, promotes productivity, minimizes disputes, and enhances our reputation. The University will not tolerate discrimination, harassment, sexual harassment (including sexual assault), or retaliation in the workplace or educational environment, whether committed by students, alumni, staff, faculty, vendors, or visitors to the University while they are on campus.

Scope:

The University is committed to the enforcement of the Policy. Individuals who are found to have violated the Policy will be subject to the full range of sanctions, up to and including termination from the University. The University is committed to provide its employees, alumni, and students the opportunity to pursue excellence in their academic and professional activities. Each member of the community is responsible for fostering civility, for being familiar with the Policy, and for abstaining from conduct that violates the Policy.

Definitions:

Sexual Harassment:

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct where:

- Submission to such conduct is either an explicit or implicit condition of employment.
- Submission to, or rejection of, such conduct is used as the basis for employment decisions affecting the person involved.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment may take different forms such as:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.
- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex.
 - ❖ suggestive or insulting sounds; staring; whistling; gestures, content in letters, notes, facsimiles, e-mails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.
- Physical sexual harassment includes unwelcome, unwanted physical contact.

Discrimination:

It is a violation of the University policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race (including hairstyle/texture), color, national origin, age, religion, disability status, sex, sexual orientation, gender identity or expression, genetic information, marital status, or any other protected characteristic under Egyptian law.

Standards and Procedures:

BUE has established the following procedure for lodging a complaint of harassment, discrimination, or retaliation. The University will treat all aspects of the procedure confidentially to the extent reasonably possible.

- **Informal Resolution:**

Informal resolution is a possible alternative to the formal complaint resolution process if both the complainant and the respondent consent. As part of the intake process, HR will determine if an informal resolution is appropriate based on the nature of the alleged misconduct. Sanctions/corrective actions are generally not pursued as the result of an informal resolution process, though the parties may agree to appropriate remedies. HR will keep records of any resolution that is reached. The University reserves the right to cancel informal resolution if sufficient evidence suggests a formal investigation or other sanctions or remedies may be necessary and appropriate. It is not necessary to pursue informal resolution first in order to make a formal complaint, and anyone participating in informal resolution can stop that process at any time and request to continue through the formal process.

- **Formal Resolution:**

Submitting a Complaint: any individual who believes that the Policy has been violated should submit a complaint using the process described above. Complaints that are not appropriate for informal resolution will be resolved using this formal complaint process as follows:

- Complaints should be submitted as soon as possible after an incident has occurred, preferably in writing. The HR director may assist the complainant in completing a written statement or, in the event an employee refuses to provide information in writing, HR will dictate the employee's verbal complaint.
- Upon receiving a complaint or being advised by a supervisor or manager that a violation of this policy may be occurring, the HR director will notify senior management and review the complaint with the University's legal department.
- HR will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred. If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer or administrative leave.
- During the investigation, HR together with the legal department, or other management employees, will interview the complainant, the respondent, and any witnesses to determine whether the alleged conduct occurred.
- The University may implement interim and/or protective actions upon notice of alleged discrimination, harassment, and/or retaliation. Interim actions include no contact orders,

no trespass notices, providing counseling and/or medical services, academic support, living arrangement adjustments, providing a campus escort, academic or work schedule and assignment accommodations, safety planning, and referral to campus and community resources.

- The University may suspend, on an interim basis, a student or student organization or place an employee on administrative leave pending the completion of the investigation and procedures. In cases in which an interim suspension or administrative leave is imposed, the student, student organization, or the employee will be allowed to meet with an appropriate administrator before such action is imposed, or as soon as reasonably possible thereafter, to show why the action should not be implemented.
- Violation of interim provisions will be grounds for disciplinary action.
- During an interim suspension or administrative leave, a student, alumni, or employee may be denied access to University housing and/or the University campus, facilities, or events, either entirely or with specific application. As determined by the HR department, this restriction includes classes and/or all other University activities or privileges for which the individual might otherwise be eligible.
- Upon conclusion of an investigation, HR or the person conducting the investigation will submit a written report of his or her findings to the University. If it is determined that a violation of this policy has occurred, HR will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:
 - ❖ the severity, frequency, and pervasiveness of the conduct.
 - ❖ prior complaints made by the complainant.
 - ❖ prior complaints made against the respondent.
 - ❖ the quality of the evidence (e.g., firsthand knowledge, credible corroboration).
- If the investigation is inconclusive, or if it is determined that while there has been no violation of policy, potentially problematic conduct may have occurred, HR may recommend appropriate preventive action.
- Senior management will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with HR and other management staff as appropriate, and decide what action, if any, will be taken.
- Once a final decision is made by senior management, HR will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

▪ **Resistance and refusal to participate in action:**

➤ **Student withdrawal/absence:**

While charges are pending, if a student refuses to participate in the investigation or hearing and/or decides to withdraw from the University, the process will nonetheless proceed in the student’s absence to a resolution. If the student is found to have committed a policy violation, that student will not be considered for return to the University until all applicable sanctions have been completed. HR will continue to act promptly and effectively to remedy the effects of the student’s conduct upon the victim and the University community.

➤ **Employee resignation:**

While charges are pending, if an employee refuses to participate in the investigation or hearing and/or decides to resign from the University, the process will nonetheless proceed in the employee’s absence to a resolution. If the employee is found to have committed a policy violation, that employee will not be considered for return to the University unless all applicable sanctions have been completed. HR will continue to act promptly and effectively to remedy the effects of the employee’s conduct upon the victim and the University community.

Statement of Rights for Complainants and Respondents:

Both complainants and respondents will be afforded the following rights under this policy:

- To be treated with respect by University officials.
- To take advantage of campus support resources (such as Counseling Services and University Health Services for students, or Employee Assistant Programme services for employees).
- To experience a safe educational and work environment.
- To have an advisor (students) or representative (employees), so long as the advisor or representative is not legal counsel, during this process.
- To refuse to have an allegation resolved through informal procedures.
- To be free from retaliation.
- To have complaints heard in substantial accordance with these procedures.
- To have reasonable and necessary participation in the process.
- To be informed in writing of the outcome of the complaint and, where applicable, sanctions, and the rationale for the outcome.

Contact information

Questions about policy content should be directed to the office of the policy owner

Role:Director of Human Resources.....

Extension:

Email:humanresources@bue.edu.eg.....

