



College of Medicine & Dentistry at the Hills, Abbottabad

Anti-Harassment Policy



FOR THE YEAR 2025-26

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1. POLICY STATEMENT

College of Medicine and Dentistry at the Hills Abbottabad is committed to maintaining an environment that encourages and fosters appropriate conduct among all persons and respect for individual values. Accordingly, CMDH is committed to enforcing this Non-Discrimination and Anti-Harassment Policy at all levels in order to create an environment free from discrimination, harassment, retaliation and/or sexual assault. Discrimination or harassment based on race, gender and/or gender identity or expression, color, creed, religion ancestry, age, national origin, ethnicity, disability, veteran or military status, sex, sexual orientation, pregnancy, genetic information, marital status, citizenship status, or on any other legally prohibited basis is unlawful and undermines the character and purpose of CMDH. Such discrimination or harassment violates CMDH policy and will not be tolerated. Unlike other administrative policies, this policy applies to conduct which occurs not only in the workplace but also extends to conduct which occurs at any location that can be reasonably regarded as an extension of the workplace, such as any training location, social function, or any facility where work of the institution is being conducted and discussed.

This policy reflects a zero-tolerance approach towards harassment and aligns fully with the **Protection Against Harassment of Women at the Workplace Act, 2010**, as well as other relevant national legislation and international best practices. The Institution reaffirms its commitment to the dignity, equity, and well-being of all individuals within its premises and operations.

CMDH follows the Non- Discrimination and Anti-Harassment policy in letter and spirit to ensure that each complaint of Harassment is addressed responsibly and is impartial in the process and will facilitate a just and fair inquiry without retaliation. CMDH does not victimize the complainant or the witness in these cases.

2. PURPOSE

The objectives of this policy are to:

1. Prevent harassment and promote a respectful working and learning environment.
2. Provide a **clear, confidential, and reliable mechanism** for reporting and resolving complaints.
3. Ensure **timely, impartial, and fair investigations**.
4. Protect complainants and witnesses from retaliation or victimization.
5. Establish transparent disciplinary measures for policy violations.

3. SCOPE

This policy applies to all **on-campus and affiliated hospital activities**, including:

- Academic, clinical, administrative, and research interactions.

- Institutional events, field visits, and off-site programs.
- Electronic communications, including email, social media, and other digital platforms related to institutional activities.

It applies to **employees, faculty, students, contractors, and visitors**, irrespective of gender, designation, or contractual status.

4. Definitions:

A. Discrimination: is adverse treatment of any employee based on the protected class or category of persons to whom he/she belongs, rather than on the basis of his/her individual merit, with respect to the terms, conditions, or privileges of employment including, but not limited to hiring, firing, promoting, disciplining, scheduling, training, or deciding how to compensate that employee.

B. Harassment: is unwelcome verbal or physical conduct prohibited by law directed toward, or differential treatment of, an employee because of his/her membership in any protected group or on any other prohibited basis (e.g., race, gender and/or gender identity or expression, color, creed, religion, age, national origin, ethnicity, disability, veteran or military status, sex, sexual orientation, pregnancy, genetic information, marital status or citizenship status. The harasser can be the employee's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the University, such as a client or customer.

C. Bullying: "Bullying" or "harassment" is any gesture or written, verbal, graphic, or physical act (including electronically transmitted acts – i.e., cyber bullying, through the use of internet, cell phone, personal digital assistant (PDA), computer, or wireless handheld device, currently in use or later developed and used by employees) that is reasonably perceived as being dehumanizing, intimidating, hostile, humiliating, threatening, or otherwise likely to evoke fear of physical harm or emotional distress and may be motivated either by bias or prejudice based upon any actual or perceived characteristic, such as race, color, religion, ancestry, national origin, gender, sexual orientation, gender identity or expression; or a mental, physical, or sensory disability or impairment; or by any other distinguishing characteristic, or is based upon association with another person who has or is perceived to have any distinguishing characteristic. Bullying and harassment also include forms of retaliation against individuals who report or cooperate in an investigation under this policy. Such behaviors are considered to be bullying or harassment whether they take place on or off CMDH office premises, at any CMDH-sponsored function, or in a CMDH vehicle or at any time or place where an employee imminent safety or over-all wellbeing may be at issue.

“Bullying” is conduct that meets all of the following criteria:

- a) Discriminating against an individual with regard to terms and conditions of employment because of that individual's race, gender, age, religion, disability, flectional or sexual orientation, place of origin, or his/her ancestor's place of origin.
- b) Repeated criticism of work without balancing this with positivefeedback or potential solutions.
- c) Criticism that focuses on a personal characteristic rather than work performance.
- d) Criticizing a colleague to others in a way that encourages them to criticize.
- e) Aggressive behavior towards others, including unreasonable anger or shouting.
- f) Persistently setting objectives with impossible deadlines or unachievable tasks.
- g) Using unnecessary levels of excessive supervision and interfering with the small detail of work.
- h) Deliberately withholding work information or unreasonably blocking promotion or training opportunities.
- i) Any “jokes”, banter, insults, taunts or gibes which focus on personal or physical characteristics as defined above.
- j) Treating an individual differently because of marriage to or association with persons of a racial, religious or national origin group; or due to membership in or association with an organization identified with the interests of a racial,religious or national origin group; or because an individual's name or spouse's name is associated with a racial, religious or national origin group.
- k) Calling another by an unwanted nickname which refers to one or more of the above characteristics, or telling ethnic jokes which harasses an employee or create a hostile work environment.
- l) Using derogatory references regarding any of the above characteristics in any job-related communication.
- m) Engaging in threatening, intimidating, or hostile acts, in the workplace, based on the foregoing classifications.

“Harassment” is conduct that meets all of the following criteria:

- a) Generalized gender-based remarks and comments.
- b) Unwanted physical contact such as intentional touching, grabbing, pinching, brushing against another's body or impeding or blocking movement.
- c) Verbal or written sexually suggestive or obscene comments, jokes or propositions including letters, notes, e-mail, invitations, SMS, phone calls, gestures or inappropriate comments about a person's clothing.
- d) Visual contact, such as leering or staring at another's body, gesturing, displaying sexually suggestive objects, cartoons, posters, magazines or pictures of scantily clad individuals.
- e) Explicit or implicit suggestions of sex by a supervisor or manager in return for a favorable employment action such as hiring, compensation, promotion, or retention.
- f) Suggesting or implying that failure to accept a request for a date or sex would result in an adverse employment consequence with respect to any employment practice such as performance evaluations or promotional opportunity.
- g) Continuing to engage in certain behaviors of a sexual nature after an objection has been raised by the target of such inappropriate behaviors.
- h) An employee of CMDH found guilty of harassment of a community member and beneficiary member where he/she is engaged for the execution of official duties of CMDH.

5. Awareness Raising and Educating Employees Regarding this Issue

- College of Medicine and Dentistry at the Hills Abbottabad displays copies of the policy in English as well as in languages understood by the majority of the student and employees at conspicuous places in the organization and work places.
- Awareness sessions and orientations on the policy are arranged on regular basis.

6. Employee and students Responsibilities

Any employee who believes that she/he has been subjected to any form of prohibited discrimination/harassment, or who witnesses others staff members or community being subjected to such harassment or discrimination is encouraged to promptly report the incident(s) to either their supervisor, manager, Anti- Harassment Committee or directly to the Principal. Employees are directed to support any colleague who has been a victim of such harassment. All employees are expected to cooperate with investigations undertaken and failure to cooperate in an investigation should result in disciplinary action, upto and including termination.

7. Supervisor Responsibilities

Supervisors should make every effort to maintain a work environment that is free from any form of prohibited discrimination/harassment. Supervisors are expected to take all allegations of discrimination/harassment, seriously, and to immediately refer the matter to the Anti-Harassment Committee (Standing Committee) or Principal & DEAN. Be alert to the possibility of discrimination/harassment/bullying occurring and take prompt action as soon as it is identified, Use his/her judgment in correcting conduct or behavior that could be perceived as offensive and remind individuals of CMDH policy when appropriate.

8. Complaint Process

A complainant may find it difficult to report discrimination/harassment/bullying because of the fear of embarrassment, publicity, economic vulnerability, and fear of retaliation by the accused, co-worker or the employer. CMDH does not see filing of the complaint as detrimental to the image of the institution but rather an opportunity to address the problem and restore the confidence of all employees and to indicate that management takes such complaints seriously and professionally.

College of Medicine and Dentistry at the Hills Abbottabad constituted a three member standing “Anti-Harassment Committee” among whom one is woman, senior faculty member and a representative of employees. In case a complaint is made against any member of the committee, management will replace that member for that case or may permanently eliminate him/her from the committee.

The Principal & DEAN is the competent authority to impose any penalties resulting and recommended by the committee.

Where discrimination/harassment is found to have occurred, the management shall take prompt and appropriate remedial action to stop the discrimination/harassment and deter its reoccurrence.

A written record of the discrimination/harassment complaints received are maintained as confidential records to the extent practicable and appropriate.

8. Prohibition against Retaliation

Retaliation against any employee who alleges that she/he was the victim of discrimination/harassment or against any employee who provides information in the course of an investigation into claims of unlawful discrimination/harassment in the workplace are prohibited under this policy. Any employee bringing a complaint, providing information for an investigation, or testifying in any proceeding under this policy are not subjected to adverse employment consequences based upon such involvement or be the subject of retaliation.

9. False Accusations and Information

If any employee knowingly makes a false accusation of unlawful discrimination/harassment or knowingly provides false information in the course of an investigation of a complaint, will be dealt with breach of conduct and be grounded for strict disciplinary action. However, complaints made in good faith, even if found to be unsubstantiated, are not considered a false accusation.

a. Confidentiality

All complaints and investigations are handled, to the extent possible, in a manner that will protect the privacy interests of those involved. To the extent practical and appropriate under the circumstances, confidentiality is maintained throughout the investigation process. In the course of an investigation it may be necessary to discuss the claims with the alleged harasser and other person (s) who may have relevant knowledge. It therefore is necessary to disclose information to person (s) with a legitimate need to know about the matter. All persons interviewed are directed not to discuss any aspect of the investigation with others in light of the important privacy interests of all concerned. Failure to comply with this confidentiality directive may result in disciplinary action.

b. Disciplinary Action

Any employee found to have violated this policy might be subject to appropriate disciplinary action, which may include; suspension, reassignment, or termination of employment. Referral to another appropriate authority for review for possible violation of Federal or Provincial Law may also be appropriate.

10.Procedure

The following procedures will be adopted when conducting an enquiry into the harassment cases.

i. Informal Way of Dealing with Harassment at the Workplace

1. An informal approach to resolve a complaint of harassment is through mediation between the parties involved and by providing advice and counseling on a strictly confidential basis.
2. A staff member can report (in writing) an incident of harassment informally to the Anti-Harassment Committee, in which case the anti- harassment committee can address the issue at their discretion in the spirit of this policy.
3. If the case or complaint is taken up for investigation at an informal level, a committee member/supervisor/Principal will conduct the investigation in a confidential manner; the accused will be approached with the intension of resolving the matter in a confidential manner.
4. If the incident or the case reported does constitute harassment of a higher degree and the committee member/supervisor/Principal reviewing the case feels that it needs to be pursued formally for a disciplinary action, with the agreement of the complainant, the case can be taken up formally.

ii. Formal Approach

A complainant does not necessarily have to take a complaint of harassment through the informal channel. S/he can launch a formal complaint at any time.

b. Launching the Complaint

The Complainant will launch a formal complaint to his/her supervisor, Anti-Harassment Committee or Principal & DEAN.

c. Procedure of Investigation

In case a complaint is launched against a member of the senior management, no member of the Enquiry Committee should be in a position where they are directly or indirectly reporting to the accused. Assistance in the inquiry procedure could also be sought from the Board.

d. Conducive Environment for Inquiry

Temporary adjustment can be made so that the accused and complainant do not have interaction for official purposes during the investigation period. This may include temporarily changing the office, in case both the accused and complainant sit in the same office, or taking away any extra charge over and above their contracts which may give one party excessive charge over the others job conditions. CMDH can also send the accused on leaves or suspend him/her in reference to CMDH Policy & Procedure.

e. Evidence

- a) It is acknowledged that harassment usually occurs between colleagues when they are alone; therefore usually it is difficult to produce evidence. It is strongly recommended that staff should report an offensive behavior immediately to someone they trust, even if they do not wish to launch a formal complaint at the time. Although not reporting immediately should not affect the merits of the case.
- b) Detailed account of the complainant and the accused form a part of the evidence.
- c) Witness statements
- d) Statements of persons with whom the complainant might have discussed the incident, statements of persons from whom advice may have informally been sought, should be considered as evidence.
- e) Any other document, audio or video records can be submitted. Expert technical advice can be sought for such submissions.

f. Inquiry

Subject to provisions of this policy and any rules made thereunder the inquiry committee will have the power to regulate its own procedures for conducting inquiry and for the fixing place and time of its setting.

- a) Upon receiving a formal complaint, the Committee shall ask the complainant to prepare a detailed statement of incidents in case the written complaint is not detailed. A statement of allegations will be drawn by the Committee and sent to the accused.
- b) Upon receiving the written complaint, within three days the accused will be asked to prepare a response to the statement of allegations and submit to the Committee within Seven days, on his/her failure to do so without reasonable cause, the committee can proceed ex-parte and enquire into the charge and may examine such oral or documentary evidence in support of the charge or in defense of the accused as the committee may consider necessary and each party will be entitled to cross-examine the witnesses against him/her.
- c) The statements and other evidence acquired in the inquiry process will be considered confidential materials.
- d) An officer in the institution could be designated to provide advice and assistance to each party.
- e) Parties, the complainant and the accused will have the right to be represented or accompanied by a friend or a colleague.
- f) The Committee will organize verbal hearings with the complainant and the accused.
- g) Upon conclusion of the inquiry the report would be submitted to the Principal with recommendations for further action.

g. Findings, Recommendations and Penalties

The committee will submit its findings and recommendations to the Principal within two weeks of the initiation of inquiry. If the committee finds the accused to be guilty it will recommend to the Principal.



11. Implementation of the decision

- The Principal & DEAN will impose the penalties recommended by the committee within one week of the receipt of the recommendations.
- The committee will meet on a regular basis and monitor the situation regularly until they are satisfied that their recommendation subject to decision and have been implemented.
- Post decision situation will be monitored to avoid any reaction of the inquiry or decision imposed; the accused can also be kept under observation for the purpose.