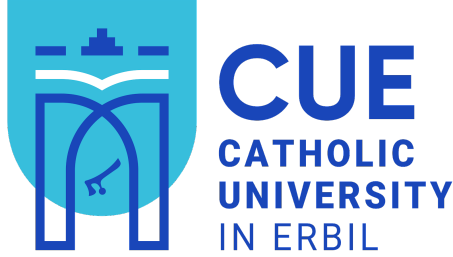


ANTI-HARASSMENT		POLICY NUMBER: CUE-SA-007
		EFFECTIVE DATE: Jul-15 2025
		REVISION DATE: Jul-15 2028

THE CATHOLIC UNIVERSITY IN ERBIL

ANTI-HARASSMENT POLICY

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I. DOCUMENT TYPE

☒ Policy

☐ Procedures

II. PURPOSE

The purpose of this policy is to define harassment, including sexual harassment, designate different offices and parties responsible for enforcing this policy, outline procedures for filing complaints and investigating harassment claims, and state appropriate disciplinary measures in the case of violations.

III. SCOPE

☒ University-Wide OR ☐ Departmental Specify Department(s):

This policy and procedure applies to all CUE faculty, administrative staff (staff), students, guests, visitors, and other individuals directly or indirectly involved in any form of harassment outlined below.

IV. POLICY STATEMENT

1. CUE is dedicated to ensuring a safe and harassment-free environment for all faculty, staff, students, and guests. Faculty, staff, and students are prohibited from engaging in harassment, whether on or off CUE premises, and whether during or outside of operational hours. CUE also upholds a zero-tolerance stance on harassment from non-CUE individuals including, but not limited to, guests, partners, investors, contractors, suppliers, and any party interacting with CUE on its campus. All reports of harassment will be treated with utmost seriousness, and thorough investigations will be conducted promptly. Complaints will be handled with respect, confidentiality, and without fear of retaliation. In instances where harassment constitutes a criminal offense, CUE will comply with applicable laws and report such incidents to the local authorities as required.
2. Employees who violate this policy will be subject to disciplinary action up to and including termination. Students who violate this policy will be subject to disciplinary action up to and including dismissal. Non-employees who violate this policy will be subject to expulsion from the property and will be denied future access under applicable trespass laws.
3. Any CUE employee who witnesses or is informed of harassment, regardless of whether the employee is directly involved or not, must report the harassment via one of the procedures outlined in this policy. For more information about CUE's expectations for employee conduct, refer to CUE's Employee Code of Conduct.

V. POLICY PRINCIPLES

1. This policy's guiding principles are as follows:
 - a) To ensure a safe, harassment-free, working and academic environment;
 - b) To encourage respect between all persons at CUE;
 - c) To promote fair, equitable treatment of all persons at CUE;
 - d) To make certain that faculty, staff, and students have redress against any harassment; and
 - e) To inform faculty, staff, and students that they may be personally liable if allegations of harassment are substantiated against them

VI. DEFINITIONS

Harassment - any verbal or physical conduct designed to threaten, intimidate, or coerce a person or persons.

Retaliation or retaliatory behavior - Any action that appears immediately or proximately caused by a bad-faith assumption or conclusion about another person including but not limited to: negatively influencing salary determinations, hiring and promotion decisions, evaluation results, or any action attempted to resolve perceived or actual unfair treatment conducted without due process or oversight.

Sexual harassment - a form of harassment of a sexual nature which offends, humiliates, and/or intimidates a person or persons; sexual harassment may take different forms, be verbal, nonverbal, physical, or a combination of any of the three. Sexual harassment includes harassment occurring during the employment process or between figures of differing authority:

Quid pro quo harassment - sexual harassment occurring during any stage of the employment process (e.g., hiring, training, promoting, admitting, disciplining, dismissing, etc.) wherein a faculty or staff member attempts to influence said process or other benefits related to employment, student, or related positions, in exchange for sexual favors.

Sexual favoritism - sexual harassment occurring between figures of different authority where the figure in a higher position of authority rewards or disciplines those who submit or do not submit to his/her sexual advances by awarding or denying promotions, merit rating, salary increases, or any other benefit.

VII. HARASSMENT

1. CUE prohibits harassment of any kind and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:
 - a) Verbal harassment includes comments that are offensive or unwelcome regarding a person's sexuality, race, religion, ethnicity, disability, or age. Verbal harassment includes epithets, slurs, defamation, and negative stereotyping.
 - b) Nonverbal harassment includes distribution, display, or discussion of any written or graphic material digital or otherwise that ridicules, denigrates, insults, belittles, or shows hostility, aversion, or disrespect toward an individual or group because of sexuality, race, religion, ethnicity, disability, or age.
 - c) Physical harassment includes any degree of violence, including, but not limited to, intimidation, threats, physical attack, or property damage. Physical harassment is strictly prohibited on CUE grounds (leased or owned) or at any time while conducting CUE business. The act in question need not be a violation of the law to be subject to this policy.

VIII. SEXUAL HARASSMENT

1. CUE recognizes that anyone can be a victim of sexual harassment, regardless of their sex or sex of the harasser. Sexual harassment does not require an intention to offend or intimidate. Even actions or words intended as jokes, pranks, or compliments can contribute to or lead to sexual harassment if they are inappropriate or unwanted. What is important is that the sexual conduct is offensive to the person towards whom the conduct is directed.
2. CUE also recognizes that unlawful sexual harassment is not limited to the physical campus of the University. All sexual harassment is unlawful and prohibited both on and off-campus, including at social events, business trips, training sessions, and/or conferences where the CUE attendee is acting as a representative of the University. Any form of electronic or digital communication by faculty, staff, or student directed at another member of CUE's community can

be considered unlawful harassment, even if it occurs outside of CUE's campus or normal operational hours.

3. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether or not there has been a violation of this policy:
 - a) 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; whistling; obscene gestures; content in letters, notes, facsimiles, emails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.
 - b) Verbal sexual harassment includes verbal abuse or "kidding" which is sexual in nature and unwelcome 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 or sexual intimacy), and sexually explicit messages via any form of electronic communication.
 - c) Physical sexual harassment includes unwelcome, unwanted physical contact, including indecent exposure, touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault, rape, sexual assault, molestation, or attempts to commit said actions.

IX. CRIMINAL OFFENSES

1. Certain types of harassment may also constitute criminal offenses under local law. This includes, but is not limited to, behaviors such as indecent exposure, stalking, sexual assault, and any obscene or threatening communications, whether online or offline. Faculty, staff, and students at CUE who believe they have been victims of criminal activity are strongly encouraged to report the incident to local law enforcement, in addition to notifying their direct supervisor, the HR Office, or, for students, the Student Affairs Office.
2. While local authorities are responsible for investigating criminal matters, CUE also has an obligation to address allegations of harassment within its community. This may involve determining appropriate disciplinary actions for individuals found guilty of harassment under University policies.
3. In accordance with the Iraqi Law of Criminal Procedure (Iraqi Criminal Procedure Code 23 of 1971), CUE reserves the right to report incidents that constitute a criminal offense to local authorities, ensuring compliance with the law and protecting the safety and integrity of the university environment.

X. RESPONSIBILITIES

1. Responsibilities of Human Resources and Student Affairs Office

- a) The Human Resources Office oversees cases involving faculty and staff, while the Student Affairs Office handles incidents concerning students. These offices are responsible for upholding this policy by implementing reasonable and proportionate measures to eliminate harassment from CUE's environment and protect victims' rights. Each office is committed to:
 - i) **Establishing Clear Reporting Procedures** – Providing accessible and transparent processes for filing grievances and complaints.
 - ii) **Taking Proactive Measures** – Addressing potential harassment concerns promptly, even in the absence of a formal complaint.
 - iii) **Ensuring Policy Compliance** – Monitoring adherence to this policy and enforcing necessary corrective actions.

- iv) **Identifying and Mitigating Risks** – Assessing potential risk factors and implementing measures to prevent harassment.
- v) **Providing Education and Training** – Offering comprehensive training and informational resources to promote awareness and policy effectiveness.

2. Responsibilities of Heads of Offices

- a) **Lead by Example** – Uphold and model professional, respectful, and ethical behavior for faculty, staff, and students.
- b) **Ensure a Safe Environment** – Maintain educational and workplace settings that uphold high standards of conduct and remain free from harassment.
- c) **Promote Policy Awareness and Compliance** – Educate faculty, staff, and students on the university's anti-harassment policies and reporting procedures.
- d) **Respond Promptly and Seriously** – Address complaints of harassment with urgency, ensuring a thorough and fair resolution.
- e) **Handle Cases with Confidentiality and Sensitivity** – Manage harassment complaints with discretion, protecting the rights and privacy of all parties involved.

3. Responsibilities of Faculty, Staff, and Students

- a) **Adhere to Policies** – Comply with the university's Anti-Harassment Policy, Employee Code of Conduct, and Student Code of Conduct.
- b) **Report Incidents** – Immediately report any observed or experienced harassment.
- c) **Engage in Training** – Participate in mandatory training sessions offered by the Human Resources Office and/or Student Affairs Office.
- d) **Demonstrate Professionalism** – Maintain appropriate and respectful behavior at all times.
- e) **Ensure Confidentiality** – Handle harassment complaints with discretion and professionalism.
- f) **Prevent Retaliation** – Support and protect individuals who file or participate in harassment investigations.

4. Responsibilities of Legal Affairs

- a) **Understand and Uphold Policy** – Be knowledgeable about harassment policies and reporting procedures.
- b) **Provide Guidance** – Offer information during relevant complaint procedures and serve on the Disciplinary Committee (Student or Staff) as needed.
- c) **Participate in Training** – Engage in professional development to effectively fulfill these responsibilities.

XI. RETALIATION

1. CUE strictly prohibits any form of retaliation against faculty, staff, or students who report incidents of harassment, provide relevant information, or participate in an investigation. No individual shall be subjected to termination, disciplinary action, discrimination, or any other adverse employment or educational consequences for acting in good faith under this policy.
2. CUE maintains a **zero-tolerance policy** for retaliation. Any faculty, staff, or student found to be engaging in retaliatory behavior will face disciplinary action, up to and including termination of employment or dismissal from the University.
3. However, knowingly filing false or malicious complaints constitutes an abuse of this policy. Any individual found responsible for making groundless or bad-faith allegations will be subject to disciplinary measures, which may include termination or dismissal.

XII. COMPLAINTS PROCEDURES

1. CUE handles all aspects of the harassment, discrimination, and retaliation complaint procedure with strict confidentiality, to the extent that it is reasonably possible. Victims of harassment are encouraged to contact the Human Resources Office (if the alleged harassment is employee-initiated) or the Student Affairs Office (if the alleged harassment is student-initiated) to discuss the situation and seek guidance on the next steps.
2. Complaints of harassment and/or retaliation can be reported by anyone, can be reported anonymously, and can be reported either verbally or in writing, though faculty, staff, and students are encouraged to submit their complaints in writing for a formal record.
3. If the report is made by a complainant who wishes to remain anonymous, the complainant should file an anonymous report on CUE's official website using the Student Incident Report Form or Employee Incident Report Form without completing the identifying information (see Appendix I and II). If the report is made verbally by a complainant who wishes to remain anonymous, the person to whom it is reported should file a corresponding Anonymous Incident Report Form on their behalf.
4. If the report is made by a complainant who does *not* wish to remain anonymous, the complainant should file the appropriate Incident Report Form, depending on if the complainant is an employee or student. If the initial report is made verbally by a complainant who does *not* wish to remain anonymous, the figure to whom it is reported should file the appropriate Incident Report Form on their behalf, depending on if the complainant is an employee or student.
5. If it is *not* an Anonymous Incident Report Form, it should be noted on the report if the complainant wishes to follow an informal or formal procedure. If it is not noted, then the informal procedure should be initiated unless or until the complainant wishes to initiate a formal procedure.
6. If a complainant reports an incident to the HR Office that falls under the purview of the SA Office, or vice-versa, then that report will be forwarded to the appropriate Office. The Office should begin the appropriate procedure within one (1) working day of receiving said reports. Both offices will always:
 - a) Maintain strict confidentiality throughout the process and securely document all interactions.
 - b) Notify the appropriate disciplinary committee if a formal procedure is required.
 - c) Facilitate discussions between involved parties to explore potential informal resolution, except in cases where the complainant prefers to remain anonymous.
 - d) Conduct follow-ups to verify that the concerning behavior has ceased.
7. **Anonymous Complaints Procedure**
 - a) CUE acknowledges that harassment may occur in situations where it is difficult for the victim to address the issue directly and/or to file a report for fear of retaliation, despite CUE's strict no-tolerance policy for retaliation. Therefore, CUE has established an anonymous report channel on Moodle (students) and CUE Central (faculty and staff). Any person who wishes to remain anonymous is encouraged to submit the Student Incident Report Form or Employee Incident Report Form on CUE's website. They may also fill out a printed anonymous report or verbally report to a person from the HR Office who will then file an anonymous report on their behalf. All anonymous reports will automatically be sent to the HR Office. Any reports falling under the purview of the SA Office should be immediately forwarded to that office.
 - b) Once notified within the previously mentioned time-frame, the appropriate office will investigate whether the incidents of harassment occurred. If there is substantiating evidence that the harassment occurred, the office will:
 - i) Notify the alleged harasser of the complaint and allow them an opportunity to respond.

- ii) Ensure the alleged harasser understands the complaint procedures and their rights within the process.
- iii) Prepare a report detailing the investigation findings and recommendations to be submitted to the appropriate disciplinary committee (see Disciplinary Actions in this policy for more information).
- iv) Maintain a record of all actions taken throughout the process.
- v) Ensure that all records remain restricted.
- c) The process should be completed in a timely manner, within ten (10) days, absent good cause, of receiving the initial report.

8. Informal Complaints Procedure

- a) Victims who do not wish to remain anonymous may directly contact the HR Office (if the incident involves an employee) or the SA Office (if the incident involves only students) to discuss the situation and seek guidance on the next steps. If a complainant reports an incident to the HR Office that falls under the purview of the SA Office, or vice-versa, then that report will be forwarded to the appropriate Office.
- b) Once notified of alleged harassment the office handling the report will contact the complainant within two (2) working days to:
 - i) Ensure accuracy of original report and documentation to maintain an accurate record of reported incidents, including dates, times, and specific details.
 - ii) Clarify the complainant's preferred outcome for resolution.
 - iii) Provide a clear explanation of the complaint resolution process.
 - iv) Outline available resolution options, informing the complainant that continuing to pursue an informal resolution does not prevent future formal action.
 - v) Advise the complainant of their right to seek legal recourse outside the institution.
 - vi) Facilitate discussions between the complainant and the alleged harasser(s), provided the complainant consents to said discussions.
- c) Upon receiving a complaint, the office will also be in contact with the alleged harasser within two (2) working days to:
 - i) Notify the alleged harasser(s) of the complaint and allow them an opportunity to respond.
 - ii) Ensure the alleged harasser(s) understands the complaint procedures and their rights within the process.

9. Formal Complaints Procedure

- a) If a victim prefers to file a formal complaint, or if the informal process does not resolve the issue, a formal complaint procedure will be initiated. The HR Office or the SA Office, as appropriate for the report, will then conduct a formal initial investigation. The initial investigation will include:
 - i) Separate interviews with the complainant and the alleged harasser(s).
 - ii) Interviews of other relevant witnesses, separately.
 - iii) A report detailing the investigation findings and recommendations.
- b) If the harassment is substantiated, the office will then refer the case to the appropriate disciplinary committee: the Employee Discipline Committee if the incident is employee-initiated harassment, or the Student Discipline Committee if the incident is student-initiated harassment. Both Committees should invite a representative from Legal Affairs, if appropriate, and then:
 - i) Re-interview any involved persons, if determined appropriate.
 - ii) Determine appropriate remedies for the complainant, if the harassment is substantiated.
 - iii) Determine appropriate disciplinary action(s), if the harassment is substantiated.

- iv) Conduct follow-ups to ensure the implementation of the remedies and disciplinary action(s).
- v) Keep a securely restricted record of all actions taken throughout the process.
- c) The process should be completed in a timely manner, within ten (10) days, absent good cause, of receiving the initial report.

10. Inconclusive Investigations

- a) If the initial investigation is inconclusive or if it is determined that there has been no violation of policy, but potentially problematic conduct may have occurred, then the HR Office or the SA Office may recommend appropriate preventive action. The appropriate discipline committee will review the investigative report and any statements submitted by the complainant or respondent, discuss the results of the investigation with the HR Office or the SA Office, as appropriate, and decide what action, if any, will be taken. Once a final decision is made by the committee, the appropriate Office will meet with the involved parties, separately, to notify them of the findings of the investigation.

XIII. DISCIPLINARY ACTION

1. Employee Harassment

- a) Employees are expected to hold themselves to the standards outlined in the Employee Code of Conduct. Suitable deterrent actions will be applied to ensure that incidents of harassment and sexual harassment are not treated as trivial. Any verified allegations of harassment will result in disciplinary action(s). Formal investigations should be conducted by the Employee Discipline Committee, with the involvement of a representative from the Social Cohesion Office and/or Legal Affairs, if appropriate. The appropriate disciplinary action(s) will depend on the following factors:
 - i) The severity, frequency, and pervasiveness of the conduct.
 - ii) Prior complaints or allegations of misconduct against the employee
 - iii) The quality of the evidence (i.e. firsthand knowledge, credible corroboration).
- b) Any employee who has been found to have harassed another person under the terms of this policy is liable to any of the following sanctions:
 - i) Verbal or written warning
 - ii) Adverse performance evaluation
 - iii) Transfer to a different department or office
 - iv) Demotion
 - v) Suspension
 - vi) Termination
- c) For more information about disciplinary action for employees, please refer to the Employee Code of Conduct.

2. Employee-student Harassment

- a) Any instance of an employee harassing a student is considered a breach of authority. Employees found to have harassed students will be subject to immediate disciplinary action, including and up to termination. Formal investigations of employee-initiated harassment of students will be conducted by the Employee Discipline Committee, with the involvement of a representative from the Social Cohesion Office, Academic Affairs, and/or Legal Affairs, if appropriate.

3. Student Harassment

- a) Any allegations of student-initiated harassment should be handled according to the non-academic disciplinary process outlined in the Student Code of Conduct. Formal investigations should be conducted by the Student Discipline Committee, with the involvement of a representative from the Social Cohesion Office and/or Legal Affairs, if appropriate.

XIV. CONFIDENTIALITY

1. All complaints and investigations are treated as restricted data to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant will be disclosed only when necessary for a fair investigation, and with all reasonable measures in place to protect them from retaliation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR Office or the SA Office, depending on which office handled the incident investigation.

XV. SEXUAL HARASSMENT PREVENTION TRAINING

1. Sexual Harassment Prevention Training aims to enhance participants' understanding of harassment, with a specific focus on sexual harassment, to foster a safer and more respectful environment. The goal is to prevent future incidents, transform workplace culture, and educate faculty, staff, and students on recognizing harassment and the appropriate steps to take if it occurs. This training will be conducted within the first week of each academic year, with all faculty, staff, and students required to complete and pass the course. The HR Office will be responsible for organizing and administering the training sessions.

XVI. POLICY DEVELOPMENT AND AUTHORIZING PARTIES

1. Owned by: HR, Mar-17 2025
2. Reviewed by: Policy and Procedure Review Committee, Mar-19 2025
3. Approved by: President's Cabinet, Jul-15 2025
4. Approved by: Board of Trustees, **Date**
5. Adopted: **Date**

APPENDIX I - STUDENT INCIDENT REPORT FORM

	STUDENT INCIDENT REPORT FORM	FORM NUMBER: SA-FR-007
		EFFECTIVE DATE: Jul-15 2025 REVISION DATE: Jul-15 2028

Include only one complaint per form. Additional pages may be used for the same complaint, if necessary. Separate forms should be used for new or different complaints. The form is to be submitted to the Registrar.	
IDENTIFYING INFORMATION	
Full name	
Student ID #	
Current academic year	
Department	
CUE email address	
Personal phone number	
IDENTIFYING INFORMATION OF PERSON(S) INVOLVED	
Name	
Department/office (if an employee)	
Additional names	
INCIDENT INFORMATION	
Please provide a clear, concise summary of the incident	
Date of incident	
Names and contact information of witnesses	
Resolution sought	
COMPLAINANT'S SIGNATURE	

	STUDENT INCIDENT REPORT FORM	FORM NUMBER: SA-FR-007
		EFFECTIVE DATE: Jul-15 2025 REVISION DATE: Jul-15 2028

Signature: _____ Date: ____ / ____ / ____ _____ Name: _____ On behalf of: _____
RECEIPT BY THE REGISTRATION OFFICE
Signature: _____ Date: ____ / ____ / ____ _____ Name: _____ Position: _____
RETURN TO THE REGISTRATION OFFICE

APPENDIX II - EMPLOYEE INCIDENT REPORT FORM

	EMPLOYEE INCIDENT REPORT FORM	FORM NUMBER: HR-FR-005
		EFFECTIVE DATE: Jul-15 2025 REVISION DATE: Jul-15 2028

Include only one complaint per form. Additional pages may be used for the same complaint, if necessary. Separate forms should be used for new or different complaints.

The form is to be submitted to the Registrar.

IDENTIFYING INFORMATION	
Full name	
Department/office	
Position	
CUE email address	
Personal phone number	
IDENTIFYING INFORMATION OF PERSON(S) INVOLVED	
Name	
Department/office (if an employee)	
Additional names	
INCIDENT INFORMATION	
Please provide a clear, concise summary of the incident	
Date of incident	
Names and contact information of witnesses	
Resolution sought	
COMPLAINANT'S SIGNATURE	
Signature: _____ Date: ____ / ____ / ____ Name: _____	

	EMPLOYEE INCIDENT REPORT FORM	FORM NUMBER: HR-FR-005
		EFFECTIVE DATE: Jul-15 2025 REVISION DATE: Jul-15 2028

On behalf of: _____
RECEIPT BY HR
Signature: _____ Date: ____ / ____ / ____
Name: _____
Position: _____
RETURN TO HR