



COMMONWEALTH VETERINARY ASSOCIATION

Global Anti-Harassment Policy

1. Purpose

The objective of this Global Anti-Harassment Policy ("Policy") is to provide protection against harassment of Commonwealth Veterinary Association and its affiliates', interns, volunteers, contractors and employees at its workplace. It also provides a mechanism for prevention and to address complaints of harassment and for matters connected or incidental thereto. This Policy is set up to help the organization maintain a healthy working environment that is safe and free of harassment and protect the right of all individuals to work with dignity.

The purpose of this Policy is:

1. To communicate that the Company has a "zero tolerance" approach towards harassment. Thus this Policy defines the Company's position regarding individuals indulging in harassing behavior and any individual being harassed, in order to maintain a working environment that is free of harassment.
2. The Company's stand is that harassment is a form of misconduct that undermines the integrity of working relationships, and the culture and image of the organization. All individuals/ personnel/ volunteers engaged with the Company directly or through third party have the right to work in an environment free from all forms of discrimination and conduct which can be considered harassing, coercive, or disruptive. The Policy advocates the right of every individual engaged with the Company directly or through third party to work in an environment free of all forms of harassment – verbal, written, physical, visual or otherwise.

2. Scope

The scope of this Policy is as follows:

1. The Policy covers all interns, volunteers, contractors and employees of the Company in Australia, India, Nigeria and Tanzania, and all personnel engaged or associated with the Company through a third party or any other manpower company providing services to the Company, including individuals working remotely. Individuals in Jamaica should follow the Policy in Appendix B instead.
2. The Policy includes any work-related settings and activities whether inside or outside the workplace and includes business trips and business-related social events.

3. Definitions

For purposes of this Policy the following definitions shall apply:

Term	Definition
Company	Company shall mean and include all Commonwealth Veterinary Association entities globally

Employer	“Employer” means in relation to any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate Government or a local authority, the head of that department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority, as the case may be, may by an order specify in this behalf; in any workplace not covered under sub-clause (i), any person responsible for the management, supervision and control of the workplace.
Individual	Individual means and includes: • Employed for any work – regular, temporary, ad hoc, daily wage basis Whether directly or • Through agent or through contractor • For remuneration or not • Whether voluntary or otherwise • Whether terms of employment are express or implied • Includes a co-worker, contract worker, probationer, trainee or apprentice or called by any such name
Workplace	Workplace means: (i) any office, branch, unit, department or undertaking established, owned, controlled or substantially financed directly or indirectly by the Company; (ii) any place visited by an individual during the course of employment (such as meetings at third party premises, offsite meetings and public venues), including transportation provided by the Company for undertaking such journey; and/or (iii) any other location prescribed by local law.

4. Harassment Defined

The Company strictly prohibits all forms of harassment, which includes harassment on the basis of the following protected categories: age, breastfeeding status, gender, race, color, religious beliefs, physical or mental disability, medical history, physical features, sex, sexual orientation, legal sexual activity, sexual preference, criminal record, marital or relationship status, parental status, family or carer’s responsibilities, pregnancy or potential pregnancy, political opinion and activity, national extraction, genetic information, gender identity, intersex status, trade union membership, or family or social background, industrial activity, employment activity, any personal association with someone who has or is assumed to have one of these traits or any other status protected by law. These protected categories also include a perception that the individual has any of these characteristics or is associated with a person who has (or is perceived to have) any of these characteristics.

Unlawful harassment includes but is not limited to:

- **Sexual Harassment** – unlawful sexual harassment occurs when a person makes an unwelcome sexual advance or request for sexual favors, or engages in other, unwelcome conduct of a sexual nature, and if a reasonable person would have anticipated the possibility that the conduct would humiliate, intimidate, or offend the complainant;

Sexual Harassment means one or a series of incidents involving the following:

- a. physical contact and advances;
- b. a demand or request for sexual favours;
- c. making sexually coloured remarks;
- d. showing pornography;
- e. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances (among others) if they occur or are present in relation to or connected with any act or behaviour of sexual harassment may also amount to sexual harassment:

- a. Implied or explicit promise of preferential treatment in employment;
 - b. Implied or explicit threat of detrimental treatment in employment;
 - c. Implied or explicit threat about present or future employment status;
 - d. Interference with work or creating an intimidating or offensive or hostile working environment;
 - e. Humiliating treatment likely to affect health or safety;
 - f. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, text messages, e-mails, gestures, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, any other communication which offends an individual's sensibilities and affects his/her performance at work; or
 - g. Teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy; or
 - h. Any unwelcome gesture having sexual overtones to the extent not covered above.
- **Harassment on the Grounds of Sex** – a person harasses another person on the grounds of sex if the person engages in unwelcome conduct of a demeaning nature in relation to the person harassed by reason of the sex of the person harassed, a characteristics that appertains generally to the persons of the sex of the person harassed or characteristic that is generally imputed to persons of the sex of the person harassed, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated;
 - **Hostile Workplace Environment on the Grounds of Sex** – a workplace environment is hostile on the grounds of sex if a reasonable person, having regard to all the circumstances, would have anticipated the conduct would result in a workplace environment that is offensive, intimidating or humiliating to a person of a particular sex because of the sex of the person and a characteristic that appertains generally to the persons of the sex of the person, or a characteristic that is generally imputed to the persons of the sex of the person;
 - **Harassment** - occurs when a person engages in unwelcome conduct based on age, breastfeeding status, gender, race, color, religious beliefs, physical or mental disability, medical history, physical features, sex, sexual orientation, legal sexual activity, sexual preference, criminal record, marital or relationship status, parental status, family or carer's responsibilities, pregnancy or potential pregnancy, political opinion and activity, national extraction, gender identity, intersex status, trade union membership, family or social background, industrial activity, employment activity, any personal association with someone who has or is assumed to have one of these traits or any other status protected by law, which a reasonable person would anticipate may humiliate, intimidate, or offend the complainant;
 - **Bullying or Abuse** – unlawful bullying occurs when an individual or group of individuals repeatedly or persistently behaves unreasonably toward an employee, and that behavior creates a risk to health and safety. Unreasonable behavior is any behavior a reasonable person would consider unreasonable, which may include behavior that is victimizing, threatening, or intimidating. Bullying is unlawful regardless of the intention of the actor. Reasonable management action carried out in a reasonable manner will not constitute bullying;
 - Sexual criminal offences and serious sexual criminal offences;

5. Reporting and Complaint Procedures

All individuals, with the exception of those in India, who believe they have been subject to unlawful harassment or retaliation should follow the below reporting and complaint procedures. *Individuals in India should follow the Reporting and Complaint Procedures in Appendix A instead, all other provisions of this policy including sections 1-4 and 6-7 will continue to apply to individuals in India.*

Individuals are strongly encouraged to report any unlawful harassment or retaliation occurring in the Workplace. If you believe that you have been subjected to unlawful harassment or retaliation in the Workplace, you should immediately report the incident to your supervisor or another supervisor within the Company, if appropriate, or the Executive Director. There is no requirement to report your complaint

to any designated supervisor within the Company. Select the individual with whom you feel the most comfortable discussing your complaint. Do not report your complaint to any individual who has allegedly engaged in the inappropriate behavior that is the subject of your complaint. In addition, if you observe or have knowledge of unlawful harassment or retaliation by another employee, supervisor, manager or non-employee, please report the incident immediately to the individuals identified above.

Supervisors have an affirmative obligation to report any and all conduct of which they are made aware, which violate or may violate, the Company's policies prohibiting harassment or retaliation. Supervisors must report the conduct to the Executive Director, as appropriate. Supervisors who fail to report alleged violations may be subject to disciplinary action, up to and including termination.

Complaints can be submitted in writing or verbally. Employees who witness such incidents should report it, even if they were not personally subjected to the misconduct. The complaint should be as specific as possible and include the names of individuals involved, the names of any witnesses, and any supporting documentation. Employees may submit their complaints anonymously.

The Company takes all complaints of harassment and retaliation seriously. Upon notice of conduct violating this Policy, the Company will look into the facts and circumstances of the alleged violation, as appropriate. The Company may attempt to resolve the situation by promptly undertaking an effective, thorough, and objective investigation through the use of qualified personnel. The Company's investigation methods vary depending on the nature of the complaint, the allegations, the witnesses, and other factors. In the event the complaint involves the Executive Director, a member of the Board of Directors, any person who oversees investigations related to unlawful harassment or retaliation, or any other staff member who conducts or oversees investigations who would have a conflict of interest or appearance of a conflict (e.g., close friends with accuser or person accused), the Company will retain an individual who is outside the organization to conduct the investigation.

All information disclosed during the course of an investigation will remain as confidential as possible, except to the extent reasonably necessary to conduct the investigation and take any remedial actions, or as required by law. Complete confidentiality cannot be guaranteed. To the extent possible, employee's confidentiality and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure. The Company may exercise its discretion to put certain interim measures in place, such as a suspension, leave of absence or a transfer, while the investigation proceeds.

The Company will document its progress during the investigation. The Company will reach a reasonable conclusion based on the evidence collected, and close the investigation in a timely manner. The employee and the alleged harasser will be informed of the outcome of the investigation. The final investigation report will be shared with the subject of the investigation to the extent that it shall not be contrary to the data protection laws. All individuals are required to fully cooperate with the Company's investigation, which includes, but is not limited to, providing all pertinent information in a truthful manner, submitting pertinent documents in their possession, not interfering with the investigation in any manner, and maintaining an appropriate level of discretion regarding the investigation. Failure to do so may result in disciplinary action, up to and including termination.

The Company prohibits Individuals from hindering internal investigations and the internal complaint procedure. The Company prohibits retaliation against individuals as a result of lodging an honest complaint or participating in any workplace investigation.

Where misconduct is found, the Company will choose appropriate remedial measures. The remedial action will be taken to commensurate with the severity of the offense according to the discretion of management and can include disciplinary measures up to and including termination of an assignment/ appointment/ employment or relationship with the Company. The Company shall be obliged to report the incident to the relevant authorities to the extent that the incidence amounts to a criminal offense. Due to privacy protections, the Company may not be able to disclose its entire decision regarding corrective action to the complainant.

6. Prohibition on Retaliation

The Company prohibits retaliation against individuals who engage in protected activity pursuant to this policy. Protected activity may include, but is not necessarily limited to, the following: reporting an actual or perceived violation of this Policy, opposing practices or conduct prohibited by this Policy or the person reasonably believes is unlawful, reporting or assisting in reporting suspected violations of this Policy, or cooperating or participating in investigations or proceedings arising out of a violation of this Policy. Retaliation includes bullying and harassment, creating a hostile work environment, ostracising or excluding the individuals involved from regular activities, making material changes to their terms and conditions of employment, terminating their employment, or otherwise punishing them via other means.

Any employee determined to be responsible for engaging in prohibited retaliation will be subject to appropriate disciplinary action, up to and including termination of employment / contract. Moreover, any employee, supervisor, or manager who condones or ignores potential violations of this Policy will be subject to appropriate disciplinary action, up to and including termination of employment / contract.

If you believe you have been subjected to, witnessed, or have knowledge about retaliation in the workplace, please follow the complaint procedures outlined above.

7. Administrative Guidelines

- This Policy is a statement of the Company's intent only and does not create contractual rights. The Company reserves the right to make exceptions to this Policy in its discretion.
- This Policy is applicable to all Company interns, volunteers, employees and contractors unless contrary to local laws and regulations. Company operations in different countries may have more stringent policies or implementing procedures where required by local law. In the event of a conflict, these more stringent local policies and implementing procedures will take precedence.

APPENDIX A – India Addendum

I. Purpose

The purpose of this Appendix is to set forth the specific investigatory procedures that apply to complaints in India in accordance with the requirements of Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

II. Complaint Procedure

1. Any individual who feels they are being sexually harassed directly or indirectly may report the complaint within a period of 3 months from the date of incident, and in the case of a series of incidents, within 3 months from the date of last incident, to the Executive Director at shireencva@gmail.com. In the event the complaint involves the Executive Director, a member of the Board of Directors, any person who oversees investigations related to unlawful harassment or retaliation, or any other staff member who conducts or oversees investigations who would have a conflict of interest or appearance of a conflict (e.g., close friends with accuser or person accused), the complaint should be sent to Dr.S.Abdul Rahman at shireencva@gmail.com. Company may retain an individual who is outside the organization to conduct the investigation ("External Investigator").
2. The Executive Director/External Investigator may for reasons to be recorded in writing, extend the time limit by a further period not exceeding three months, if they are satisfied that the circumstances were such which prevented the individual from filing a complaint within the said period.
3. The complainant must ensure that the complaint contains all the material and relevant details concerning the alleged sexual harassment including the name of the subject of the complaint, along with the supporting documents and names of the witnesses while it is being taken up by the Executive Director/External Investigator for investigation. The complaint shall be in writing.

III. Complaint Redressal Procedure

1. After the complaint is received as above, the Executive Director/External Investigator will forward the complaint to the subject of the complaint who is required to respond within 10 days along with supporting documents and list of witnesses. The complainant may request the Executive Director/External Investigator before initiating an inquiry to take steps to settle the matter between the complainant and the subject through conciliation. In the event there is a settlement, the Executive Director/External Investigator shall record the settlement with the signatures of both the parties and the Executive Director/External Investigator shall forward it to the Company.
2. A copy of the conciliation so recorded shall be provided to both the parties and the complaint shall be treated as closed.
3. Upon failure to arrive at a conciliation, the Executive Director/External Investigator shall proceed to conduct the enquiry.
4. The following points of the enquiry should be noted:
 - a. Both parties may be allowed to take the assistance of their colleagues but no lawyers / advocates can accompany either of the parties.
 - b. The complainant shall present their evidence before the Executive Director/External Investigator directly and/or through any witnesses.

- c. The subject may request to cross examine the complainant's witnesses, if any.
- d. Thereafter the subject may present their evidence through witnesses.
- e. The complainant may request to cross examine the subject's witnesses, if any.
- f. Both parties shall be allowed to represent their case on the basis of the evidence recorded.
- g. Thereafter the Executive Director/External Investigator shall proceed to pass its orders.

The Executive Director/External Investigator may summon witnesses as per the power conferred under the law.

IV. Interim Measures

While a complaint is pending inquiry, the complainant may make a written request to transfer themselves or to request the transfer of the subject or for leave (up to 3 months). The complainant can also request Executive Director/External Investigator to prohibit the subject from reporting on the complainant's work performance or writing confidential reports regarding the complainant.

V. Other Relevant Points

- 1. In case the complaint is found to be false and the motive is established to be malicious, the complainant shall be liable for appropriate disciplinary action as advised by the Executive Director/External Investigator. Failure to substantiate the complaint or provide adequate proof will not be deemed as a false complaint.
- 2. The contents of the complaint, identity and address, inquiry, and any other information pertaining to the inquiry and conciliation proceedings recommendations and / or the action, if any, taken against the complainant, subject and witnesses shall be kept confidential and not be published, communicated or made known to the public, press and media and other individuals by the complainant, Executive Director/External Investigator, witnesses and other people involved in resolving the matter

APPENDIX B – Jamaica Anti-Harassment Policy

Sexual Harassment includes “the making of any unwelcome sexual advance towards a person by another person, which, a) is reasonably regarded as offensive or humiliating by the person towards whom the sexual advance is made; or b) has the effect of (i) interfering unreasonably with the work performance of the person towards whom the sexual advance is made or (ii) creating an intimidating, offensive or a hostile work environment”

Sexual harassment can happen once or many times and may include physical, verbal or non-verbal actions. This form of harassment may make the victim feel offended, humiliated or offended.

The Company has a “zero tolerance” approach towards harassment. Thus this Policy defines the Company's position regarding individuals indulging in harassing behavior and any individual being harassed, in order to maintain a working environment that is free of harassment.

Harassment Defined

The following are forms of Sexual Harassment:

Physical harassment– unwanted pinching, patting, touching, kissing, groping, and hugging of a sexual nature.

Verbal harassment– unwelcomed comments on appearance/physical attributes private/personal life, sexually suggestive or explicit jokes, insult and put-downs based on a person's sex. It is important to note that often harassers hide behind the argument that comments are “compliments”; this does not mean that the behaviour is acceptable.

Non-verbal/Gestural harassment– sexually suggestive gestures e.g. winks, licking of lips, gestures with hands, fingers, legs.

Psychological/Emotional Harassment - consists of persistent proposals and unwelcome requests, unwanted invitations to go out on dates, insults, taunts or innuendos of a sexual nature.

Written/graphic/visual/audio harassment– via internet communication (including electronic messages and attachments), letters, land line telephone, cellular telephones, distribution and display of pornographic materials (visual and audio), obscene and sexually explicit language.

Quid Pro Quo: This form of sexual harassment is recognized where harassers used a position of power and authority to negotiate job benefits (employment, re-employment, continued employment, individual favourable compensation, terms, conditions, promotions, privileges), public goods (social services, security, social benefits, natural resources), socially and economically valued goods (housing, school admission, scholarships, security) are conditional on an exchange of sexual or physical contact, and refusal leads to failure to access any of the above.

Stalking/ Cyber Stalking– Obsessively following, besetting, contacting and watching a person, either in person or using the internet, telephone, mail, and other media, which is motivated by what the perpetrator believes are feelings of desire and love constitute sexual harassment.

Voyeurism (“Peeping Tom”)– The act of watching, taping, recording, photographing a person without their knowledge, in a clandestine manner or otherwise, while the person uses or inhabits a space where they have an expectation of privacy such as their domicile, a public bathroom, changing room etc., is a sexually harassing act.

Intimidation/Bully/Retaliation–Persons often use non-sexual behaviour to accommodate sexual harassment. Therefore any act of intimidation meant to prevent someone from reporting sexually harassing behaviour or to punish someone for reporting sexually harassing behaviour must be considered as a type of sexual harassment.

NB: Acts or comments of a sexual nature, not intended to harass, can constitute sexual harassment if another person feels uncomfortable with such subjects. Claiming to not understand or failing to know that an act is harassing does not mean that it is not in fact harassment.

Toxic Environment– A combination of the above can create a toxic and oppressive environment for the direct target but also for other persons who are not targeted. Even if a person is not the direct target of sexual harassment but is made uncomfortable and is offended by the creation of a toxic environment, they should be able to make a report of sexual harassment.

The definitions of the above terms are subject to any definitions to the contrary as set out in the First Schedule of **The Sexual Harassment (Protection and Prevention) Act 2021**.

It is acknowledged that some¹ sexual harassment is subjective and circumstantial and that there is no definitive, exhaustive list of inappropriate behaviours.

Reporting and Complaint Procedures

The Company recognises the problems that harassment can cause at work and will strive to ensure that such unacceptable behaviour does not take place. It may not be appropriate for the normal grievance procedure to be used for complaints of harassment. A procedure has therefore been developed for dealing with complaints of sexual harassment.

The procedure seeks to ensure minimum stress for the individual with timely resolution of complaints and a degree of flexibility appropriate to individual circumstances.

At all stages of the procedure the need to ensure confidentiality will be of paramount importance. Information will be given on a "need to know" basis only and will be strictly restricted to ensure a fair hearing, both to the complainant and the alleged harasser.

Informal Procedure

This stage is appropriate where the employee simply wants the behaviour to stop. Employees can seek to resolve matters informally by:

- Approaching the alleged harasser directly, if he/she feels able to do so, making it clear to the person(s) harassing the employee that the behaviour in question is offensive, unwanted and that he/she wants it to stop. This can be done verbally or in writing.
- Approaching the alleged harasser with the support of a /Supervisor/Manager or requesting such a person to make the approach on behalf of the employee. This is often sufficient to correct the situation, particularly if the individual(s) involved was unaware that the behaviour was causing offence.

Where an employee seeks the support of a Colleague/Supervisor/Manager he/she will be sensitively informed that their role at the informal stage is one of support and assistance. The employee will also be advised that:

- Formal investigation and possible disciplinary action can only take place if the complaint is investigated under the formal procedure.
 - All reported incidents of harassment will be monitored and in the event of any patterns
 - emerging management may wish to initiate its own formal investigation and take remedial action (including disciplinary action) where this proves to be necessary.
 - A written record of the action taken will be made to assist with any formal proceedings which may arise if the behaviour does not stop.
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The Formal Stage

At any time, whether or not informal action has been taken, any individual who feels that he/she has been harassed, sexually harassed, bullied, victimised or treated in a way that breaches this policy can make a formal complaint in writing to his/her line manager. In the event the complaint involves the Executive Director, a member of the Board of Directors, any person who oversees investigations related to unlawful harassment or retaliation, or any other staff member who conducts or oversees investigations who would have a conflict of interest or appearance of a conflict (e.g., close friends with accuser or person accused), the Company will retain an individual who is outside the organization to conduct the investigation ("External Investigator").

A formal complaint of harassment, sexual harassment, bullying, and/or victimisation should include the nature of the complaint, with reference to dates, times and places (where possible) in relation to a specific incident(s) as well as the names of any witness or witnesses to the incident(s).

The person making the complaint should also provide a written account of any attempts made to resolve the matter informally.

Investigating a Formal Complaint

All managers and supervisors who receive a complaint or information about sexual harassment, must encourage the complainant to refer the complaint to the Person with Responsibility for Human Resources/ External Investigator and supervisors must:

- Treat all complaints or concerns of alleged or possible harassment seriously, whether or not the complaint is considered minor or who is involved.
- Take any appropriate action to prevent retaliation or prohibited conduct from recurring during and after any complaint and/or investigation; and
- Ensure the provision of a safe/private space to discuss complaints.
- The Person with Responsibility for Human Resources/External Investigator will have designated responsibility for all proceedings at the formal stage. He/She is responsible for ensuring that the formal complaint procedure and where appropriate the disciplinary procedure is consistently followed.
- The Person with Responsibility for Human Resources/External Investigator and the Responsible Officer(s) will investigate the matter and should not be connected in any way with the allegation that has been made.
- The Person with Responsibility for Human Resources/External Investigator will be responsible for arranging all meetings and maintaining a written record of all proceedings including the investigation and any outcome.
- Complaints should be raised as soon as possible following an act of alleged harassment so that the matter can be dealt with swiftly and decisively.
- The Person with Responsibility for Human Resources/External Investigator will acknowledge receipt of the complaint and arrange a meeting to discuss the complaint. This initial meeting will normally take place within five (5) working days.

Person with Responsibility for Human Resources or External Investigator:

The Person with Responsibility for Human Resources or External Investigator is responsible for:

- (a) Ensuring that the complainant and the accused are aware of the seriousness of a sexual harassment complaint.
- (b) Explaining the sexual harassment policy, investigating and disciplinary procedures for all parties.
- (c) Interviewing identified witnesses, making arrangements, gathering statements and preparing a written report to the Company, or the person or body designated to receive complaints; and
- (d) Informing the complainant and the accused of the applicable procedures and facilitating requests for recusal of members where necessary.
- (e) If a complaint is made, or if there is reason to believe there is sexual harassment occurring, the HR Officer or the relevant person is to immediately investigate and address the allegations. Specifically, he/she will:
 - Collect as many details as possible,
 - Take immediate action (if the allegation warrants)
 - Choose an appropriate investigator.
 - Conduct interviews with witnesses, the alleged harasser and other related parties
 - Gather and document physical and digital evidence.
 - Come to a preliminary conclusion about the allegations.
- (f) If the investigation proves that the allegations are credible, then he/she are required to immediately take appropriate corrective action. Depending on the severity of the sexual misconduct, corrective measures range from a single verbal warning to dismissal in accordance with the Disciplinary Policies of the Company and even referral to the authorities for potential criminal penalties.

Follow-up

- (g) Once the investigation has been closed, the responsible officers will follow-up with the victim and related parties to obtain feedback and ensure that the issue has been resolved to their satisfaction.

All Individuals

- (a) If an individual believes that he/she has been subjected to conduct or behaviour that he/she perceives has the potential to be considered sexual harassment, the individual should immediately make it known to the person, orally or in writing, advising that such conduct is unwelcome, offensive, and must stop. **This is a discretionary and personal warning to the individual to stop. If the behaviour continues, the affected employee may file a formal complaint.**

If these efforts are ineffective or if the victim wants to escalate the issue, they can report the allegations in one of the following ways:

- Organize a meeting with (or send an email to) a responsible official.
- Where an employee has been sexually harassed by another employee or by a third party, the employee must follow the complaint procedure outlined.

Initial Meeting with the Complainant

The Person with Responsibility for Human Resources and the Responsible Officer(s) or the External Investigator will meet the Complainant to:

- Clarify and formally record the nature of the complaint and confirm that it is being handled under the formal procedure.

- Ensure that the Complainant is aware of the next stage of the procedure.
- The Complainant will have the right to be assisted at this meeting by a representative of their choice.

Avoiding Contact between Complainant and Alleged Harasser

The issue of avoiding contact between the Complainant and the alleged harasser must be considered before action is taken to inform the alleged harasser of the complaint.

Where a case of serious harassment has been alleged, consideration will be given to taking appropriate action concerning avoiding contact following discussion with the Complainant.

Informing the Alleged Harasser

The Person with Responsibility for Human Resources and the Responsible Officer or the External Investigator will meet with the alleged harasser within two working days of receipt of the complaint by the Person with Responsibility for Human Resources/External Investigator to:

- Outline the nature of the complaint
- Confirm that it is being handled under the formal procedure
- Ensure that the employee is aware of the next stages of the procedure.

Following this meeting HR will write to the alleged harasser outlining the nature of the complaint and setting a date for a formal meeting normally to be held within [5] working days of the complaint being received.

The Investigation

Whilst the Person with Responsibility for Human Resources and the Responsible Officer or External Investigator will seek to resolve the matter as quickly as possible, the meetings with all involved need not necessarily follow immediately after each other.

Every effort will be made to have held all necessary meetings within [10] working days of the date the complaint was received. Where this is not practicable the Complainant and the alleged harasser will be so advised. The investigation into the complaint will, in any event, commence within fourteen days of the complaint being lodged.

Meeting with Complainant

The Person with Responsibility for Human Resources and the Responsible Officer or the External Investigator will meet with the complainant and consider their comments and any other related matter. The complainant will have the right to be accompanied by a representative of their choice. The Complainant will at this meeting also be advised that, once all internal mechanisms and procedures available to the complainant are exhausted and the complainant is of the view that the matter remains unresolved, the complainant has the right to make a complaint directly to the Sexual Harassment Tribunal.

Meeting with Alleged Harasser

The Person with Responsibility for Human Resources and the Responsible Officer or the External Investigator will then meet the alleged harasser and hear his/her response to the alleged incident. The alleged harasser will have the right to be accompanied by a representative of their choice

Meeting With Anyone Who Can Assist with the Investigation

Having heard the complainant, the Person with Responsibility for Human Resources and the Responsible Officer or the External Investigator will meet anyone who can assist further with the investigation. Each individual will be asked to outline what happened.

The Person with Responsibility for Human Resources and the Responsible Officer or the External Investigator will meet the manager of both the complainant and the alleged harasser to establish if there has been any previous history of conflict between them and/or other parties.

The Person with Responsibility for Human Resources and the Responsible Officer or the External Investigator may then wish to have further meetings to clarify or gain additional information.

Consideration of Information and Reporting the Facts

As far as possible, all those giving information to the Person with Responsibility for Human Resources and the Responsible Officer or the External Investigator do so privately and not in the presence of any other person involved in or present during the alleged incident. All evidence provided to assist with the investigation will be treated as confidential to the investigation.

The Person with Responsibility for Human Resources in consultation with the Responsible Officer or the External Investigator autonomously will then prepare a written report outlining the facts, indicating their findings, and whether a case of harassment is substantiated.

Decision on Disciplinary Action

The Person with Responsibility for Human Resources and the Responsible Officer or External Investigator will consider the facts and will decide whether to:

- Initiate the Organisation's agreed disciplinary procedure against any party as appropriate;
- Provide additional training and or counselling or
- Take no further action.

False Claims

A person/ persons who are found to willfully and knowingly bring forth a false claim of sexual harassment against another individual shall be liable for a breach of the sexual harassment policy and shall be reprimanded accordingly.

Communicating the Decision

The decision taken will be communicated in writing to both the Complainant and the person against whom the complaint was made. The Person with Responsibility for Human Resources/ External Investigator will also inform the Complainant or the alleged harasser of his/her right to appeal against any decision taken within 10 working days of communication of the decision and how to do so.

Counselling

Counselling will be offered to the person who has been harassed and to the harasser. This will be provided by a trained member of staff or by an external provider.

Further Meetings

The Responsible Officer may meet the employee who has alleged harassment on a regular basis to offer support and to ensure that no harassment or victimisation continues. This action will be undertaken even where a complaint has not been upheld.

Review

If the individual bringing the claim is not in agreement with the determination of the committee, a new and independent review committee shall be established to re-evaluate the claim and the procedures followed during the investigation of the claim.

If this committee is unable to arrive at a position which is mutually accepted by all parties, the complainant may refer the matter to the Sexual Harassment Tribunal.

If the Commission fails to act in a timely manner or act at all in compliance with this Policy, the complainant may make a complaint directly to the Sexual Harassment Tribunal.

Confidentiality and Maintenance of a Register

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department. All claims of harassment shall be documented thoroughly and archived for the purposes of monitoring and evaluation.

Action will be taken to protect the privacy of all parties involved throughout the course of the investigation. If an individual/individuals are found to be in breach of said policy, the expectation of privacy shall be relaxed to the extent that it is legally permitted.

Subject to the above, a Register shall be maintained which contains the following information in respect of every sexual harassment claim that has been lodged:

- (a) The names of the parties to the sexual harassment claim;
- (b) The particulars of the sexual harassment claim;
- (c) The date on which the sexual harassment claim was lodged;
- (d) The finding of a sexual harassment claim;
- (e) Any action taken by the employer
- (f) Such other particulars relation to the sexual harassment claim as may be prescribed by law.

Prohibition on Retaliation

The Sexual Harassment (Protection and Prevention) Act 2021 describes bullying, intimidation and threats which are meant to accommodate sexual harassment or retaliate against an individual/individuals who have made a claim of sexual harassment as acts of sexual harassment and shall be treated accordingly.

The Company prohibits retaliation against individuals who engage in protected activity pursuant to this policy. Protected activity may include, but is not necessarily limited to, the following: reporting an actual or perceived violation of this Policy, opposing practices or conduct prohibited by this Policy or the person reasonably believes is unlawful, reporting or assisting in reporting suspected violations of this Policy, or cooperating or participating in investigations or proceedings arising out of a violation of this Policy. Retaliation includes bullying and harassment, creating a hostile work environment, ostracising or excluding the individuals involved from regular activities, making material changes to their terms and conditions of employment, terminating their employment, or otherwise punishing them via other means.

Any employee determined to be responsible for engaging in prohibited retaliation will be subject to appropriate disciplinary action, up to and including termination of employment / contract. Moreover, any employee, supervisor, or manager who condones or ignores potential violations of this Policy will be subject to appropriate disciplinary action, up to and including termination of employment / contract.

If you believe you have been subjected to, witnessed, or have knowledge about retaliation in the workplace, please follow the complaint procedures outlined above.

Administrative Guidelines

This Policy is applicable to all Company interns, volunteers, employees and contractors unless contrary to local laws and regulations. Company operations in different countries may have more stringent policies or implementing procedures where required by local law. In the event of a conflict, these more stringent local policies and implementing procedures will take precedence.



S.Abdul Rahman

Executive Director Commonwealth Veterinary Association

Trustee, Alliance for Rabies Control, UK

Former Chairman OIE Animal Welfare Working Group, Paris

Former Dean, Bangalore Veterinary College, Bangalore

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BANGALORE, INDIA

Dated: 19th, July 2024