



FAZAIA MEDICAL COLLEGE POLICY
ON
PROTECTION AGAINST HARASSMENT

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SECTION A

1. INTRODUCTION

The Fazaia Medical College (FMC), Air University Islamabad recognizes its obligation to maintain high ethical standards including equality of gender amongst faculty/staff and students, no matter the time, place or occasion.

Gender harassment, or gender-based harassment, is a practice of sex discrimination. It usually happens when one person harasses another for reasons relating to their gender or the gender with which they identify. In Pakistan, legally after the directives given by the Federal Government, and NADRA can register persons into one of the three genders; male, female, and transgender.

The Provincial & Federal Ombudsman along with the Higher Education Commission through its "Policy Guidelines Against Sexual Harassment in Institutions of Higher Learning" advised all educational institutes to formulate a detailed policy document safeguarding the interests and rights of its faculty, staff, and students.

Pursuing with HEC directives, the following will be referred from time to time;

- a. Policy Guidelines Against Sexual Harassment in Institutions of Higher Learning outline by Higher Education Commission
- b. The Act referred above
- c. The Fazaia Medical College Act and policies

2. PURPOSE

The purpose of this policy is to provide a comprehensive framework for Fazaia Medical College to protect its employees and students and safeguard them against all sexual harassment issues.

3. THE POLICY

The Fazaia Medical College is committed to a workplace free of harassment or bullying based on sex, age, caste, ethnic background, religious beliefs, sect, disability, medical condition, marital status caring and job responsibilities. Policy caters equally for the men, women and transgender and provides all employees, affected by harassment or bullying, with a means of redress. Any employee who is found to be harassing or bullying those will face disciplinary action including termination.

4. PRINCIPLES AND PURPOSES OF THE POLICY

- a. Members of the FMC community have several important rights and privileges, central among which is the right to pursue inquiry and search for knowledge without hindrance from unlawful or otherwise unacceptable constraints, to live and work in a safe environment in which their dignity is protected.
- b. In accordance with the terms of this policy, sexual harassment shall be prohibited at FMC, and shall constitute a punishable offence under the policy. The goal of this policy is to prevent sexual harassment from taking place, and where necessary to act upon complaints of sexual harassment promptly, fairly, judiciously and with due regard to confidentiality for all parties concerned.
- c. All administrators and others in supervisory or leadership positions have an obligation to be familiar with and to uphold this policy and its procedures along with informing members of their staff about its existence
- d. This policy has been made pursuant to the powers granted to the HEC under the Higher Education Commission Ordinance, 2002, and is binding on Fazaia Medical College. Failure to comply with the HEC's policies may lead to regulatory action.
- e. This policy is consistent with and has been made in light of the provisions of the Protection against Harassment of Women at the Workplace Act 2010 (as amended) (the "2010 Harassment Act"). It extends the protection against sexual harassment to all members of FMC community, and provides the option to aggrieved persons to seek recourse to resources within FMC.

SECTION B

1. DEFINITION OF HARASSMENT

"Harassment" means any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature or sexually demeaning attitude, causing interference with work performance or creating an intimidating, hostile or offensive work environment or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment.

[Ref: Protection Against Harassment of Women at the Workplace Act, 2010 (Act No. IV of 2010)]

2. WHAT ARE HARRASSING BEHAVIOURS?

a. Personal Harassment

Any behavior including in-person communication, telephone calls, voice messages, text messages, email messages, social networking site postings, instant messages, postings of pictures or information on websites, written letters, gifts, ordering goods or services, or any other communications that are undesired and/or place another person in fear, and undermines the performance of that person.

b. Ethnic/Religious Harassment

A form of discrimination which includes ethnic jokes, religious slurs, comments on one's sect, offensive or derogatory comments, or other verbal or physical conduct based on an individual's ethnicity, religion, sect, or place of origin. Such conduct may create an intimidating, hostile, or offensive working environment, or interfere with the individual's work performance.

c. Sexual Harassment

Any unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. It can be either on a onetime basis or in a continuous series of incidents, however minor. Sexual harassment is coercive and one-sided. Both men and women can be affected.

d. Sexist Harassment

Any unwanted comments, sexist statements, slurs, jokes, sexist graffiti and literature including articles, pictures and posters.

e. Bullying

Bullying is unwanted, aggressive behavior that involves a real or perceived power imbalance. Bullying can happen by managers towards workers, among co-workers, by workers towards managers. It can be verbal or in writing, or online. This includes saying or writing mean things, such as, name-calling, inappropriate comments, taunting, threatening to cause harm; social includes hurting someone's reputation or relationships, leaving someone out on purpose, spreading rumors about someone, embarrassing publically.

3. PROHIBITED CONDUCT

a. Sexual harassment" means any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature, or sexually demeaning attitudes, where:

- 1) Submission to such conduct is made either explicitly or implicitly at the term or condition of an individual participation in any activity at FMC;
- 2) Submission to or rejection of such conduct by an individual is used as a basis for academic or employment decision affecting that individual; or
- 3) Such conduct has the purpose or effect of unreasonably interfering with an individual's academic or work performance, or of creating an intimidating, hostile, or offensive educational or working environment.

b. Sexual harassment may be overt or subtle, and can range from visual signals or gestures to verbal abuse to physical contact along with hand or sign language to denote sexual activity, persistent and unwelcome flirting. The following behaviors are specifically prohibited under this policy.

- 1) *Especially Egregious Non-Consensual Acts*: Acts that would be included in the category of rape. While such situations will be covered under the laws of the country, and law enforcement institutions and the courts will investigate and adjudicate accordingly, the FMC administration has a special obligation to take preventative measures, offer immediate assistance and take interim measures when required.

2) *Non-Consensual Sexual Contact*: Includes sexual contact with another person without consent.

3) *Sexual Exploitation*: Taking of actions that violate the sexual privacy of others or taking sexual advantage of another without their consent. For example, taking pictures, videotaping, viewing or distributing explicit images or sexual information of another person without their consent.

4) *Other Pervasive or Severe Behaviors*: It is not necessary that there be actual sexual contact for a behavior to be categorized as sexual harassment. Other unwelcome behaviors are also prohibited if (i) they are based on an individual's sex or gender (ii) are persistent or highly serious and (iii) create an atmosphere which is intimidating or hostile. These include but are not limited to lewd remarks or gestures, highly offensive jokes of a sexual nature, commenting inappropriately about another's body, and stalking.

5) *Sex Discrimination*: Adverse treatment of individuals based on their sex or gender rather than on merit. This would include instances such as the singling out (for such adverse treatment as lower salary or grades, or more severe punishment) of person(s) on the basis of sex or gender.

c. All the actions categorized as sexual harassment when done physically or verbally would also be considered as sexual harassment when done electronically such as through the internet, e-mails, social media, texting, telephone, voicemail etc.

d. All actions of harassment or discrimination may be taken by a person of any gender against a person of the same or another gender, and would need to be considered by the college if the act qualifies as a prohibited act under the policy.

e. Sexual harassment is especially offensive when perpetrated by persons in authority, and when submission is made a condition toward any FMC activity or benefit (for example, when submission is made the basis of the evaluation of an individual).

f. Sexual harassment will be considered especially egregious when the accused knew or reasonably should have known that the victim was in an impaired or incapacitated state. However, impairment of the accused, such as a result of the use of any illegal substances, shall not diminish their responsibility for harassment under this policy.

(Ref: HEC Policy Guidelines Against Sexual Harassment in Institutions of Higher Learning)

4. SOME OF THE PUNISHABLE SEXUAL OFFENCES AT FMC

- a. Asking female students to visit personal offices of their supervisors/authorities in charge after office hours to discuss their grades and assignments.
- b. Asking female students to meet supervisors/authorities in-charge out of the FMC premises with the promise of improvement in grades.
- c. Financial and sexual gratification from undergraduate or graduate students (Ph.D., M.Phil., Masters) by their supervisors/teachers.
- d. Intimidation of faculty/staff by students/colleagues to tarnish the reputation (character assassination) of faculty/staff.
- e. Harassment by senior students of the junior students, female students, or minority students.
- f. Unwelcome sexual advances whether they involve physical touching or not.
- g. Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life.

5. JURISDICTION

- a. This policy applies to actions by students, faculty, staff and other members of the HEI community (such as interns, residents etc.), or third parties (such as service providers, visitors etc.), when the misconduct occurs:
 - b. on the FMC property (i.e. on campus) or in its immediate vicinity;
 - c. off the FMC property, if (i) the conduct occurs in connection with an FMC recognized program or activity or (ii) the conduct may create a hostile environment or pose a safety risk on campus; and
 - d. using the university's computing or network resources accessed from an off-campus location, which shall be deemed to have occurred on campus.

SECTION C

1. THE HARRASMENT COMMITTEE

This Committee will be consisting of two bodies

- a. The FMC shall designate at least two members from FMC administration (the **Focal Persons**), at least one of whom shall be a woman, to offer support and immediate assistance to those who have experienced sexual harassment. Contact information of focal persons shall be made available, including on the FMC website.
- b. The FMC shall also constitute a three-member Inquiry Council to investigate and adjudicate any allegations of prohibited conduct (the **Inquiry Council**) following the provision of Section 14 below. Those who have experienced sexual harassment may also contact members of the Inquiry Committee for support and advice.

2. THE INQUIRY COUNCIL

- a. The Inquiry Council shall be responsible for the investigation and adjudication of any complaint received in connection with the violation of this policy.
- b. The Council shall consist of three members, at least one of whom shall be a woman and one of the members shall be a member of the senior management of FMC.
- c. All members of the Council shall be employees of FMC and who will be appointed by the Principal. The Principal may co-opt one or more members if required.
- d. Members of the Council shall be individuals are known for being principled, credible, fair, gender-sensitive and have a strong character. They shall have no conflict of interest in particular cases and shall be impartial and unbiased.
- e. Members of the Council shall be appointed for a term of 3 years. No member shall serve for more than two consecutive terms. Former members will be eligible for reappointment after a lapse of three years.
- f. One of the members of the Council shall be appointed as the Chairman by the Principal FMC, whose duties shall include, but are not limited to: maintaining order during hearings, answering procedural questions, granting or denying adjournments, maintaining proper documentation of the proceedings, which shall

constitute the official record and reporting recommendations of the committee to the Principal / Vice Principal. All these duties shall be undertaken in consultation with the committee members.

g. In case a complaint is made against one of the members of the committee, that member shall be replaced by another (impartial member) for that particular case.

h. A FMC staff member shall be appointed to assist the Inquiry Council. This work shall include responsibilities such as organizing meetings, acting as a liaison between the committee and the other parties involved, record keeping, making and updating a database to track the processing of complaint. FMC shall endeavor to provide training to members, and ensuring appropriate awareness-raising about the issue of sexual harassment at its institute.

SECTION D

1. COMPLAINTS REPORTING

a. A complaint may be lodged by any person who has experienced sexual harassment as defined in Section B that may be termed as "**Prohibited Conduct**" of this policy, with either the Focal Person or with any member of the Harassment Committee.

b. Cases in which the conduct in question falls within the scope of the 2010 Harassment Act, the affected person has an option to submit a complaint to the Ombudsperson in accordance with the provisions of the 2010 Harassment Act.

c. If a complainant is reluctant to contact the Focal Persons or members of the Inquiry Council, the complainant may contact a colleague, instructor, the employment supervisor, manager, department chair, Dean, or Principal and Vice Principal. It will be the responsibility of the individual contacted to report the case to the Inquiry Council without identifying either the complainant or the alleged offender and to ask for advice on procedure and policy from them to find a solution if a solution is necessary.

d. Complainants shall be encouraged to submit complaints promptly, within 3 months but not later than 12 months from the date of alleged harassment and the duration of 12 months may be granted by the Focal Persons or the Inquiry Council upon written request stating the reason for the delay in submitting the complaint.

e. All members of the FMC community are encouraged to report any instance of sexual harassment that they may have been observed by the Focal Persons or

the Inquiry Council. To safeguard the campus community, FMC will investigate material violations of this policy even if a formal complaint has not been filed.

f. As soon as a complaint or report is received by one of members of the Harassment Committee, it shall be shared by this member (within 24 hours) with all Focal Persons and members of the Inquiry Council for further action.

g. For minor violations, complainants may opt to make an informal complaint to either the Focal Person or the Inquiry Council. The primary objective of the informal resolution mechanism is to take preventative action so that minor violations are detected early and an appropriate warning is given to the accused to stop the offending behavior before it reaches a higher degree of seriousness. If the incident reported through this mechanism constitutes prohibited conduct under Section 6, 7, 8, and 9 of this policy, the Inquiry Council shall deal with the complaint accordingly.

2. INTERIM MEASURES AND SPECIAL ARRANGEMENTS

a. As soon as a complaint or report is received by The Harassment Committee or any member of the FMC administration, depending on the nature and seriousness of the offense, the Focal Persons shall take appropriate steps to provide interim measures that may be requested by the affected persons or as otherwise may be deemed appropriate. If the affected person is not satisfied with the measures taken, he or she may contact any member of the Inquiry Council for necessary action. Interim measures include but are not limited to:

- 1) Adjustment in class or examination schedule, including hearing schedule;
- 2) Access to counseling services or appropriate medical assistance;
- 3) Change in the work assignment;
- 4) Arrangement for any assessment or evaluation to be made by a neutral person;
- 5) Adjustment to the class schedule, including withdrawal from the course or changing the section;
- 6) Notifying the campus security officials (or law enforcement in case of serious violations) regarding the violation;
- 7) Measures will be taken to prohibit contact or communication between the concerned parties during any proceedings or investigations;
- 8) Change of housing arrangement of concerned persons
- 9) Any other measure that deemed appropriate

3. INVESTIGATION AND ADJUDICATION

- a. All complaints alleging Sexual Harassment shall be forwarded to the Inquiry Council within 24 hours of being received by the Focal Persons or any other office of FMC.
- b. As soon as it is reasonably possible, after receiving a complaint, the Inquiry Council shall determine whether or not the alleged conduct against which the complaint was filed meets the criteria outlined in Section B of this policy. If it is determined by a majority of the members of the Inquiry Council that the alleged conduct meets the aforementioned criteria, a formal investigation shall be initiated.
- c. In the absence of a formal complaint, if a serious violation of this policy is reported to the Inquiry Council or a series of allegations against the same person are received, the Inquiry Council may determine by a majority of the vote to initiate proceedings after notifying to the Principal and Vice Principal.
- d. After initiating the investigation, within three days of receipt of written complaint, the Inquiry Council shall:
 - 1) Communicate with the accused, notifying him of the charges and statement of allegation leveled against him/her.
 - 2) The accused will then be required to submit a written defense within seven days. Failure to do so without reasonable cause, the Committee shall proceed ex-parte;
- e. The Committee will enquire into the charge as considered necessary, and this will involve acquiring and examining oral or documentary evidence in support of the charge or defense of the accused (including by summoning potential witnesses).
- f. The following rules shall apply to the hearings conducted by the Inquiry Committee:
 - 1) All hearings shall be closed hearings;
 - 2) The Inquiry Council shall record statements from the complainant(s) and respondent(s), the witnesses if any (as required) and study the documents and/or evidence presented by the relevant parties or collected during the process of conducting the inquiry;
 - 3) The Inquiry Council shall have the discretion to limit testimony and questioning of witnesses to conducting inquiry;
 - 4) The Chair of the Inquiry Council shall have the powers to compel a witness to attend, and the complainant(s) and/or respondent(s) may request the Chair's aid in their regard;
 - 5) The complainant and the respondent may at any stage of the hearing be represented and/or accompanied by another person of his/her choice;
 - 6) The Council shall have the right to acquire the relevant piece of evidence to further their understanding of the case and the relevant parties,

witnesses and administration are required to provide the Inquiry Council with relevant documentation and/or evidence to facilitate the investigation;

7) Objective documentation of the proceedings of the Inquiry Council shall be maintained where high confidentiality of the records and other such material shall be upheld at all times'

8) The respondent shall be allowed to cross-question the complainant and witnesses unless the Harassment committee decides otherwise;

9) Where any procedural matter is not dealt with in this policy, the Inquiry Council may be guided by the principles of fairness, and can adopt appropriate procedure, as deemed necessary.

g. Members of the FMC community must cooperate in an investigation, and refusal to cooperate may result in disciplinary action. There may be circumstances in which the complainant may wish to limit their participation in the proceedings. The complainant shall not be subject to discipline, but the FMC may be obligated to proceed with the investigation.

h. Following the formal hearing, the members of the Inquiry Council shall deliberate and determine the validity of the complaint based on the totality of the circumstances. The presence or absence of evidence cannot always be the sole criterion on which a judgment can be made. The credibility of statements and context must be kept in mind during the deliberations. The Council members will reach a decision unanimously or by a majority vote after the deliberations. Where the complaint is found valid, the Council shall recommend an appropriate penalty.

i. The Inquiry Council shall complete the inquiry and recommend its final decision within 30 days. It shall then send its decision to the Principal FMC giving its findings in writing by recording reasons thereof for the endorsement and action. Recommendations of the Inquiry Council shall be implemented within seven days.

4. DISCIPLINARY MEASURES

a. Anyone who have been found to have sexually harassed, another person under the terms of this policy shall be liable to any of the following actions:

- 1) Verbal or written warning.
- 2) Adverse performance evaluation
- 3) Reduction in wages
- 4) Transfer
- 5) Demotion
- 6) Suspension
- 7) Dismissal

b. The nature of the actions will depend on gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial.

c. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

d. In case the respondent is a student, the following sanctions may be imposed:

1) In the case of minor violations, the student may be issued a warning or reprimand. In case of future violations by the same offender, previously issued warnings/reprimands will be taken into consideration when making a decision.

2) In case of more serious violations, the following formal sanctions may be imposed:

- a) Disciplinary probation,
- b) Barred from sitting in university examinations
- c) Relegated to previous year.
- d) Withholding provisional certificate on completion of house job.
- e) Withholding of degree for a period upto 5 years (in case of final year medical student).
- f) Suspension,
- g) Expulsion.
- h) Fine or termination of job in case of FMC employees
- i) Filing a police report

e. The following may be added to any of the penalties listed above:

- 1) Relocation from campus housing;
- 2) Exclusion of the respondent from a designated portion(s) of FMC buildings or grounds,
- 3) Exclusion from one or more FMC designated activities
- 4) Attending the educational program
- 5) Inclusion of decision in the student's record

5. CONFIDENTIALITY

a. Confidentiality shall be enjoined on the Focal Persons, the Inquiry Council, and all others involved in the process. This does not preclude the reasonable and discreet disclosure of information to elicit the facts of the case or to implement and monitor properly the terms of any decision.

b. The Focal Persons, members of the Inquiry Council, and their support staff shall be subjected to administrative disciplinary action for inappropriate breach of confidentiality on their part.

c. All notes and records arising in connection with an investigation shall be maintained in a confidential file at FMC.

6. RIGHT TO APPEAL

a. Both the complainant and the respondent shall have a right to appeal the decision of the Inquiry Council within 30 days from the date of notification of the decision.

b. In case the conduct falls within the scope of the 2010 Harassment Act, the aggrieved party shall have an option to file an appeal to the Vice Chancellor AU, and if not satisfied, to the Ombudsman in accordance with the provisions of the 2010 Harassment Act.

c. There shall be a three-member appellate body (**the "Appellate Body"**) appointed by the Principal FMC that shall include at least one senior member of the FMC administration and at least one of the members of which shall be a woman. No member of the Inquiry Council shall concurrently be a member of the Appellate Body. In case the complaint had been made against one of the members of the committee, the member shall be replaced by another (impartial member) for that particular case.

d. Appeal to the Appellate Body against the decision of the Inquiry Committee can be filed on following grounds:

- 1) The alleged conduct does or does not fall within the scope of this policy;
- 2) The Inquiry Committee has decided without consideration of material information;
- 3) The adjudication process followed by the Inquiry Committee was procedurally unfair.

e. To reach its decision, the Appellate Body may communicate with affected parties, the members of the Inquiry Committee or other members of the FMC teaching faculty as it deems fit.

f. The Appellate Body may review the decisions made by the Harassment Committee, and this decision will be subject to the final review by the Vice Chancellor AU.

g. The Appellate Body may, on consideration of the appeal and any other relevant material, confirm, set aside, vary or modify the decision within 30 days in respect of which such appeal is made, and shall communicate the decision to both the parties, the Principal FM and the Inquiry Committee.

7. MALAFIDE ALLEGATION

a. False allegations of sexual harassment made out of malice or intent to hurt the reputation of the person(s) against whom the complaint is filed are to be dealt with as serious offenses. Making malafide allegation of sexual harassment knowing it to be false, whether in a formal or informal context, is a serious offense under this policy.

b. If the Inquiry Committee determines that a false allegation was made in the complaint with malafide intent, it may recommend appropriate action against the complainant by sending its findings to the Principal FMC (by recording reasons thereof and including any note of dissent) for endorsement and action.

c. The actions taken against the complainant may include:

- 1) Disciplinary probation,
- 2) Withholding of degree for a period of 5 years,
- 3) Suspension,
- 4) Expulsion.
- 5) Exclusion from one or more FMC designated activities
- 6) Exclusion from Attending the educational program
- 7) Inclusion of decision in the student's record

d. In cases where the conduct falls within the scope of the 2010 Harassment Act, the Inquiry Committee may recommend the handing over of such cases to the Appellate Body for taking further action against the complainant who made the false allegation with malafide intent.

SECTION E

1. PROTECTION AGAINST REPRISAL

a. FMC shall not allow reprisal or threats of reprisal against any member of the FMC community who makes use of this policy (formally or informally). FMC shall prohibit such threats or actions against anyone who participates (e.g. testifies, assists, etc.) in proceedings held under its jurisdiction.

b. Retaliation or any other action against the complainant of sexual

harassment shall be taken seriously under the provisions of this policy. All allegations of retaliation would be investigated formally under the purview of this policy, and if substantiated, would result in appropriate disciplinary action.

2. SPECIAL CONSIDERATIONS REGARDING RELATIONSHIPS BETWEEN INDIVIDUALS

- a. In contrast with sexual harassment, the personal relationship among consenting adults of the FMC community that do not breach the social and cultural norms of the society is, in general, shall be considered a private matter.
- b. Under the policy, it is highly inappropriate for any member of the FMC faculty, staff or administration to establish an intimate relationship with a student, subordinate or colleague on whose academic or work performance he or she will be required to make professional judgments. The policy requires that the individual may not involve themselves in such conduct as the professional responsibility for supervision or oversight would be affected in such cases. Relationships with a difference in power and authority can seriously affect the institutional working as well as the credibility of all involved. In particular, intimate or romantic relationships between faculty members and students (whether at the undergraduate or the graduate level) shall be prohibited.

3. EDUCATION FOR PREVENTION

To ensure prevention of sexual harassment on campus, FMC will develop programs to educate its staff, faculty and students as well as provide written material for reference. Education is essential to sensitizing the university faculty, staff and students in order to eliminate sexual harassment on campus. This shall be done in multiple ways, including those listed below.

- a. The FMC Sexual Harassment Policy, any of the university's internal policies as well information regarding the 2010 Act shall be:
- b. available on the FMC website;
- c. be a part of the package that all new hires receive;
- d. be a part of orientation of new students and included in any written material given to them;
- e. be included in the FMC Prospectus (a summarized version); and
- f. displayed in prominent locations on campus
- g. The names of the Focal Persons and the members of the Inquiry Committee shall be made visible/accessible to the FMC community through its website, posted on notice boards, etc.

h. The FMC shall ensure that its relevant members (e.g., Focal Persons, members of the Inquiry Committee, HR personnel, etc.) attend a training to educate themselves on sexual harassment and relevant the laws and policies. Once trained, designated HR personnel shall be made responsible for educating all personnel, staff, faculty, students that join the FMC. This will be an ongoing activity.

i. All departments at FMC must disseminate and display information about these programs, what constitutes sexual harassment, how to respond to it and what to do when someone asks for advice about sexual harassment.

4. IMPLEMENTATION OF THIS POLICY

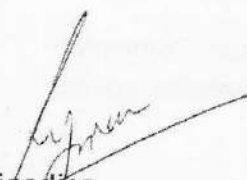
a. FMC will ensure that this policy is widely disseminated to all relevant persons. It will be uploaded on the FMC website. All new employees must be made aware of the content of this policy at the time of induction into FMC.

b. It is the responsibility of every person in an administrative position to ensure that all his/her employees are aware of the policy.


5. MONITORING AND EVALUATION

a. FMC Harassment Committee will ensure strict monitoring of the effectiveness of implementation and overall usefulness of this policy.

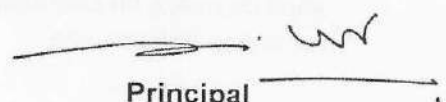
b. In addition to monitoring the compliance with this policy in letter and spirit, the committee will maintain the record of number of incidents, how they were dealt with, and any recommendations made.



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