Discrimination, Harassment, and Sexual Misconduct Policy

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Policy Steward: Vice-President for Identity and Mission
Supporting Procedure/Process:

- Discrimination, Harassment, and Sexual Misconduct Procedure
- Annex A – Illustrative Examples of Prohibited Conduct

1. Objective

USEK is committed to maintaining the highest standards that promote respect, human dignity, inclusion, and equal opportunity in an environment that fosters academic excellence and professionalism. Discrimination, harassment, sexual misconduct, intimidation, exploitation, and retaliation are inconsistent with the University's mission and core values and are prohibited.

The University is committed to preventing prohibited conduct, responding appropriately to reported concerns, preventing recurrence, and implementing corrective or disciplinary measures where warranted.

2. Definitions

University: The Holy Spirit University of Kaslik (USEK).

Student: Any individual enrolled in or participating in an undergraduate, graduate, professional, continuing education, internship, residency, exchange, or other academic program offered by the University. The term also includes individuals who withdraw from the University following an alleged violation of this Policy.

Member of the University Community: Any student, faculty member, staff member, University official, contractor, consultant, volunteer, visitor, or other individual participating in University programs, activities, or services.

Complainant: An individual who reports or alleges conduct that may constitute a violation of this Policy.

Respondent: An individual alleged to have engaged in conduct that may constitute a violation of this Policy.

3. Scope

3.1 Persons Covered

This Policy applies to all members of the USEK Community, including officers, faculty members (full-time, part-time, and visiting faculty), staff members, students (including medical interns and residents), exchange students, trainees, contractors, consultants, volunteers, visitors, and any other individuals participating in University programs, activities, or services.

3.2 Activities Covered

This Policy applies to all University programs and activities, whether conducted on-campus, off-campus, or through electronic means.

The provisions of this Policy apply to situations in which both the reporting party and the responding party are members of the USEK Community.

This Policy applies to discrimination, harassment, sexual harassment, sexual misconduct, and retaliation that occur:

a. On University property or premises;

b. Off University property when the conduct affects or could reasonably affect an individual's ability to participate in a University educational, employment, research, or other University-related program or activity;

c. Through any means of communication, including email, telephone, text messaging, social media platforms, online learning environments, or other electronic communication channels, where the conduct occurs in connection with a University program, activity, or service; or

d. Through the use of University information systems, networks, platforms, or electronic communication resources.

3.3 Geographic Applicability

This Policy applies to all USEK programs and activities conducted in Lebanon and abroad, including exchange programs, internships, field experiences, research activities, conferences, and other University-sponsored activities.

3.4 Relationship to Other Policies

This Policy shall be read in conjunction with applicable University regulations, codes of conduct, disciplinary procedures, employment policies, student regulations, and related governance documents.

4. Authority

This Policy is issued under the authority of the President of the Holy Spirit University of Kaslik (USEK) and shall be implemented in accordance with applicable Lebanese laws, University regulations, and related governance documents.

5. Policy

5.1 Institutional Commitment

The Holy Spirit University of Kaslik (USEK) is committed to maintaining the highest standards that promote respect, human dignity, inclusion, and equal opportunity in an environment that fosters academic excellence and professionalism.

Discrimination, harassment, sexual misconduct, intimidation, exploitation, and retaliation are antithetical to the University's mission and core values and are prohibited.

In support of this commitment, the University shall take reasonable measures to:

a. Prevent and address discrimination, harassment, sexual misconduct, and retaliation;

b. Promote a safe, respectful, and inclusive learning and working environment;

c. Provide accessible mechanisms for reporting concerns and seeking assistance;

d. Respond to reported concerns promptly, fairly, and consistently;

e. Prevent the recurrence of prohibited conduct through appropriate corrective and preventive measures;

f. Implement supportive, remedial, disciplinary, and educational actions, as appropriate; and

g. Protect individuals from retaliation for reporting concerns, participating in investigations, or assisting in the resolution of matters arising under this Policy.

The University shall take appropriate action to remedy the effects of discrimination, harassment, sexual misconduct, and retaliation where such conduct is found to have occurred.

5.2 Protected Characteristics

USEK is committed to fostering an environment free from discrimination, harassment, sexual misconduct, and retaliation.

No individual shall be subjected to adverse treatment, exclusion, intimidation, harassment, or other prohibited conduct based on a protected characteristic.

For the purposes of this Policy, protected characteristics include, but are not limited to:

- Race;
- Creed;
- Color;
- Sex;
- Gender identity or expression;
- Age;
- National origin;
- Religion;
- Physical appearance;
- Physical or mental disability;
- Marital status;
- Sexual orientation;
- Political orientation; and
- Any other characteristic protected under applicable law.

The University shall provide equal access to educational, employment, research, and participation opportunities without discrimination based on a protected characteristic.

5.3 Prohibited Conduct

5.3.1 Discrimination

Discrimination refers to adverse, unequal, or unfavorable treatment of an individual based on a protected characteristic, including but not limited to age, race, color, religion, creed, sex, gender identity or expression, sexual orientation, marital status, nationality, disability, political affiliation, or any other characteristic protected under applicable law.

Discrimination may occur in academic, employment, research, administrative, or other University-related contexts.

Illustrative examples of conduct that may constitute discrimination are provided in Annex A.

5.3.2 Harassment

Harassment refers to unwelcome verbal, written, visual, physical, electronic, or other conduct directed at an individual based on a protected characteristic, including but not limited to race, national origin, color, religion, age, sex, gender identity or expression, marital status, disability, or sexual orientation, where such conduct is sufficiently severe, persistent, or pervasive to unreasonably interfere with an individual's educational experience, working conditions, living conditions, or participation in University activities by creating an intimidating, hostile, degrading, or offensive environment.

Harassment may occur through in-person interactions, written communications, electronic communications, social media platforms, or any other means of communication.

Illustrative examples of conduct that may constitute harassment are provided in Annex A.

5.3.3 Sexual Harassment

Sexual harassment refers to unwelcome sexual advances, requests for sexual favors, or other unwelcome verbal, non-verbal, visual, written, electronic, or physical conduct of a sexual nature when:

a. Submission to or rejection of such conduct is explicitly or implicitly used as a basis for academic, employment, evaluation, grading, advancement, or participation decisions;

b. The conduct has the purpose or effect of unreasonably interfering with an individual's academic performance, work performance, or participation in University programs, activities, or services; or

c. The conduct creates an intimidating, hostile, offensive, or otherwise inappropriate educational, working, or living environment.

The determination of whether conduct constitutes sexual harassment shall be based on the specific facts, circumstances, and context in which the conduct occurs.

Illustrative examples of conduct that may constitute sexual harassment are provided in Annex A.

5.3.4 Sexual Misconduct

Sexual misconduct refers to conduct of a sexual nature that violates an individual's dignity, privacy, bodily integrity, or personal autonomy and is inconsistent with the values and standards of the University.

Sexual misconduct may include, but is not limited to:

- Sexual exploitation;
- Sexual coercion;
- Non-consensual sharing, distribution, or disclosure of intimate images, recordings, or personal information;
- Non-consensual observation, photography, audio recording, or video recording of an individual in a state of undress or engaged in private activity;
- Stalking involving sexual or intimate conduct;
- Physical sexual assault; and
- Other forms of non-consensual sexual conduct.

The determination of whether conduct constitutes sexual misconduct shall be based on the specific facts, circumstances, and context in which the conduct occurs.

Illustrative examples of conduct that may constitute sexual misconduct are provided in Annex A.

5.4 Confidentiality and Privacy

USEK recognizes the importance of confidentiality and privacy in matters involving allegations of discrimination, harassment, sexual harassment, sexual misconduct, and retaliation.

The confidentiality and privacy of individuals reporting, responding to, witnessing, or otherwise participating in a process under this Policy shall be respected to the greatest extent reasonably possible.

The University shall not disclose the identity of a complainant, respondent, witness, or any other individual involved in a report or investigation except where:

a. Disclosure is required by applicable law;

b. Disclosure is necessary to conduct a fair assessment, investigation, or resolution process;

c. Disclosure is necessary to protect the health, safety, or wellbeing of members of the University Community; or

d. Disclosure is otherwise required to fulfill the University's legal, regulatory, or institutional obligations.

The University reserves the right to determine which University officials have a legitimate institutional need to know information related to a report, complaint, or investigation. Access to such information shall be limited to the extent reasonably possible while ensuring the effective implementation of this Policy and the associated Procedure.

Where there is a significant and identifiable health, safety, or welfare concern, the University may contact parents, guardians, or other appropriate parties in accordance with applicable laws, regulations, and University procedures.

The University shall take reasonable measures to protect the privacy of all parties throughout the reporting, assessment, investigation, resolution, and recordkeeping processes.

5.5 Retaliation

USEK prohibits retaliation against any individual for reporting, in good faith, an alleged violation of this Policy, participating in an assessment or investigation, serving as a witness, providing information, supporting another individual in exercising rights under this Policy, or otherwise participating in a process established under this Policy.

Retaliation may take many forms, including intimidation, threats, coercion, discrimination, adverse academic or employment actions, harassment, exclusion, or any other conduct intended to discourage an individual from reporting concerns or participating in a University process.

Any act of retaliation shall be considered a violation of this Policy and may result in corrective, disciplinary, or other appropriate action in accordance with applicable University regulations and procedures.

Illustrative examples of retaliation are provided in Annex A.

5.6 Reporting and Resolution

USEK shall maintain formal procedures for the reporting, assessment, investigation, resolution, and appeal of allegations arising under this Policy.

The University shall take reports seriously and shall make reasonable efforts to ensure that concerns are addressed promptly, fairly, impartially, and consistently.

Operational requirements shall be established in the supporting Procedure.

5.7 Supportive Measures

The University shall offer and implement appropriate and reasonable supportive measures upon receiving notice of alleged acts of discrimination, harassment, sexual harassment, sexual misconduct, or retaliation.

Supportive measures are non-disciplinary, non-punitive, and individualized services designed, as appropriate and reasonably available, to:

a. Protect the safety and wellbeing of the parties involved;

b. Preserve access to educational, employment, research, and other University opportunities;

c. Maintain the integrity of the University's educational and working environment; and

d. Prevent discrimination, harassment, sexual misconduct, and retaliation.

Supportive measures may be implemented irrespective of whether a formal complaint has been submitted or an investigation has been initiated.

The University shall make reasonable efforts to maintain the confidentiality of supportive measures, provided that doing so does not impair the University's ability to implement such measures.

Supportive measures may include academic, employment, health, safety, counseling, scheduling, or other reasonable accommodations and assistance measures.

Additional requirements regarding the implementation of supportive measures shall be established in the supporting Procedure.

5.8 Education and Prevention

USEK is committed to promoting a respectful, inclusive, and safe learning and working environment through education, awareness, prevention, and capacity-building initiatives.

The University shall develop and support training, awareness, and prevention programs aimed at preventing discrimination, harassment, sexual harassment, sexual misconduct, and retaliation within the University Community.

The University shall strive to ensure that such programs are:

a. Inclusive and respectful of diverse communities and identities;

b. Responsive to the needs of the University Community;

c. Informed by relevant research, best practices, and legal requirements; and

d. Periodically assessed for effectiveness and continuous improvement.

Members of the University Community may be required to participate in training, awareness, educational, or prevention activities related to this Policy and its associated Procedure.

The University shall encourage shared responsibility among all members of the University Community for fostering a respectful environment and preventing conduct prohibited under this Policy.

5.9 False Reports

The University expects all individuals participating in processes under this Policy to act honestly and in good faith.

Knowingly making a false report, intentionally providing false information, deliberately misleading an assessment or investigation, or submitting fraudulent evidence may constitute a violation of this Policy and may result in corrective, disciplinary, or other appropriate action in accordance with applicable University regulations and procedures.

A report made in good faith that is not substantiated following assessment or investigation shall not constitute a false report.

6. Roles and Responsibilities

Role / Decision / Action	**Responsibility**	**Conditions and Limitations**
President	Approves the Policy and provides institutional oversight.	Final institutional authority.
Human Resources Office	Supports the implementation of the Policy in matters involving staff and administrative employees and coordinates related processes in accordance with the associated Procedure.	Acts within its designated area of responsibility.
Student Affairs Office	Supports the implementation of the Policy in matters involving students and coordinates related processes in accordance with the associated Procedure.	Acts within its designated area of responsibility.
Office of the Provost	Supports the implementation of the Policy in matters involving faculty members and coordinates related processes in accordance with the associated Procedure.	Acts within its designated area of responsibility.
Managers, Supervisors, Deans, Directors, and Department Heads	Promote compliance with this Policy, foster a respectful environment, and cooperate with reporting, assessment, and resolution processes when required.	Shall act in accordance with applicable University regulations and procedures.

Members of the University Community	Comply with this Policy, participate in required training and awareness activities, and report concerns when appropriate.	Subject to applicable University regulations and procedures.

REVIEW

This Policy shall be reviewed every three (3) years or earlier if required by changes in applicable laws, University regulations, accreditation requirements, institutional needs, or relevant governance practices.

The Policy Steward shall coordinate the review process in consultation with relevant University offices, including Human Resources Office, Student Affairs Office, Office of the Provost, Legal Affairs, and Institutional Effectiveness, as appropriate.

VERSION HISTORY

Version	Approved By	Approval Date	Effective Date	Sections Modified
1.0	Academic & Research Council / Board of Trustees	November 3, 2021 / April 29, 2022	April 29, 2022	Original Discrimination, Harassment & Sexual Misconduct Policy.
2.0	President	September 2026	September 2026	Reorganized under the USEK policy framework; separated policy requirements from operational procedures; introduced Roles and Responsibilities, Authority, Related Documents, Annexes, and supporting Procedure.

Annex A – Illustrative Examples of Prohibited Conduct

Purpose

This Annex provides illustrative examples of conduct that may constitute violations of the Discrimination, Harassment, and Sexual Misconduct Policy. The examples provided are not exhaustive. Whether specific conduct constitutes a violation shall be determined based on the facts, circumstances, and context of each case.

A.1 Examples of Discrimination

Examples of conduct that may constitute discrimination include, but are not limited to:

- Singling out or targeting an individual for different or less favorable treatment because of a protected characteristic;
- Applying more severe disciplinary measures because of a protected characteristic;
- Denying employment, admission, promotion, participation, or advancement opportunities because of a protected characteristic;
- Refusing to hire, admit, or retain an individual because of a protected characteristic;
- Terminating an individual from employment or an educational program because of a protected characteristic;
- Excluding an individual from University programs, activities, services, or benefits because of a protected characteristic.

A.2 Examples of Harassment

Examples of conduct that may constitute harassment include, but are not limited to:

- Making negative, offensive, degrading, or derogatory remarks about an individual's religion, nationality, ethnicity, disability, age, sex, gender identity, or other protected characteristic;
- Repeated unwelcome jokes, comments, or insults relating to a protected characteristic;
- Displaying offensive posters, pictures, symbols, messages, or other materials directed at a protected characteristic;

- Sending offensive communications through email, text messages, social media, or other electronic means;
- Engaging in conduct that creates an intimidating, hostile, degrading, or offensive educational or working environment.

A.3 Examples of Sexual Harassment

Examples of conduct that may constitute sexual harassment include, but are not limited to:

- Direct propositions of a sexual nature;
- Repeated unwelcome flirtation, advances, or propositions intended to pursue a romantic or sexual relationship;
- Persistent pressure for sexual activity;
- Repeated staring or other unwelcome visual conduct of a sexual nature;
- Inappropriate or unnecessary physical proximity;
- Unwanted touching or physical contact;
- Remarks of a sexual nature regarding a person's body, appearance, or clothing;
- Sexually explicit gestures, statements, jokes, questions, anecdotes, messages, or comments;
- Displaying sexually suggestive objects, sounds, images, or materials;
- Suggesting that academic, employment, grading, promotion, participation, or advancement opportunities depend upon acceptance of sexual conduct;
- Threats or insinuations related to rejection of sexual advances.

A.4 Examples of Sexual Misconduct

Examples of conduct that may constitute sexual misconduct include, but are not limited to:

- Sexual exploitation;
- Sexual coercion;

- Non-consensual sharing or distribution of intimate photographs, videos, audio recordings, or other private content;
- Non-consensual observation, photographing, audio recording, or video recording of an individual in a state of undress or engaged in private activity;
- Threatening to disclose intimate information or an individual's sexual orientation without consent;
- Stalking involving sexual or intimate conduct;
- Physical sexual assault;
- Other forms of non-consensual sexual conduct.

A.5 Examples of Retaliation

Examples of conduct that may constitute retaliation include, but are not limited to:

- Threatening an individual for reporting a concern;
- Intimidating or harassing an individual because they participated in a University process;
- Excluding an individual from opportunities because they served as a witness;
- Taking adverse academic or employment action because an individual made a report or participated in an investigation;
- Attempting to discourage an individual from reporting a concern or cooperating in an assessment or investigation;
- Subjecting an individual to hostility, ridicule, or adverse treatment because they exercised rights under the Policy.

A.6 Online and Electronic Conduct

The Policy applies equally to conduct occurring through:

- Email;
- Telephone communications;
- Text messaging;

- Social media platforms;
- Online learning environments;
- University information systems; and
- Any other electronic communication channel.

Examples include sending discriminatory, harassing, retaliatory, or sexually inappropriate communications through electronic means.