

**CODE OF PRACTICE**  
FOR PREVENTING AND COMBATING  
HARASSMENT  
AND SEXUAL HARASSMENT

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Cyprus  
University of  
Technology

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## 1. Introduction

Sexual harassment is a social phenomenon and a form of gender-based violence. This behaviour, which manifests itself in various ways, aims at or results in insulting the dignity of a person, in particular by creating an intimidating, hostile, degrading, humiliating or aggressive environment. Cyprus University of Technology (hereinafter “the University”) takes a position of zero tolerance for such behaviour and recognizes that sexual harassment hinders the achievement of equality in the fields of work and learning. Gender-based violence runs counter to legislation as well as the fundamental principles and values of the University.

The University, in line with the *Equal Treatment of Men and Women in Employment and Vocational Education Law* of 2002 (205(I)/2002), has created the “*Code of Practice for Preventing and Combating Harassment and Sexual Harassment*” (hereinafter referred to as the “*Code of Practice*”) aiming at preventing and combating “sexual harassment” and “harassment” in the community of the University. The University, recognizing the seriousness of the offence, considers any behaviour that constitutes harassment or sexual harassment unacceptable and is committed to maintaining an environment in which the dignity of each individual will be fully protected and the respect of the personality of everyone will be ensured. Behaviour of this nature constitutes a disciplinary misconduct and criminal offence.

In addition, the Code of Practice establishes and implements an internal procedure for handling and investigating complaints (formally or informally) with complete confidentiality.

## 2. Purposes of the Code of Practice

The Code of Practice aims to prevent and combat harassment and sexual harassment and in particular:

- To inform university staff regarding the meaning of the terms “harassment” and “sexual harassment”, about the protection provided by applicable law against conduct that may constitute harassment or sexual harassment, about their rights at any time they may be sexually or otherwise harassed and about the actions they should take when they consider themselves victims of harassment or sexual harassment.
- To promote the education and training of employees regarding the importance of:
  - (a) the principle of equal treatment between men and women;
  - (b) the prohibition of discrimination on grounds of gender or sexual orientation and
  - (c) preventing, tackling and combating harassment or sexual harassment.
- To encourage employees to participate and contribute to preventing and combating harassment and sexual harassment in the workplace and help establish a friendly workplace environment for all employees, regardless of gender or sexual orientation.
- To encourage each competent authority to adopt and implement a policy preventing harassment and sexual harassment in the workplace and a mechanism for controlling/evaluating its performance for its purpose and making adjustment / improvements.
- To promote cooperation between all competent authorities and employees to maintain a healthy and safe working environment characterised firmly by mutual respect, courtesy, honesty, understanding and mutual support.

- To provide immediate protection to any employee who considers that she or he is being sexually or otherwise harassed or has been harassed in the past, as well as provide protection against possible retaliatory acts against her or him for repelling harassment or lodging a complaint of harassment or sexual harassment.
- To define the obligations of each competent authority whenever it has suspicions for an incident of harassment or sexual harassment or becomes aware of such an incident or receives a relevant complaint.
- To guide each competent authority for the correct and immediate handling of complaints of harassment or sexual harassment and the protection of victims, as well as other parties involved in the investigation of a complaint.

### 3. Policy statement

The University as a first step in expressing its commitment to tackling sexual harassment and harassment in general, hereby presents a policy statement which provides that:

- It is strictly forbidden to engage in any form of gender discrimination, harassment or sexual harassment.
- All members of the community of the University must comply with and support the university policy and what is contained in the Code of Practice.
- All members of the community of the University are obliged to full confidentiality in case they submit evidence as part of the investigation of a complaint. Commenting on confidential information or spreading rumours will not be tolerated.
- All members of the community of the University as well as applicants and other persons collaborating with the University have the right to be treated with equality and dignity.
- Harassment and sexual harassment in the workplace will not be permitted or tolerated and the University will take appropriate action for this purpose, as provided by the relevant legislation and the Code Practice.
- Complaints of harassment or sexual harassment will be handled promptly, seriously and with full confidentiality.
- All members of the community of the University will be protected against victimization, ill-treatment and harmful change of circumstances as a result of their contribution in any way (e.g., complaint, testimony) to the investigation of a complaint of harassment or sexual harassment.

The Code of Practice is communicated to the entire community of the University and is posted on the University website.

### 4. Scope of the Code of Practice

The Code of Practice applies to all individuals belonging to the Community of the University. In particular it includes:

- a. Academic Staff members employed under any employment status (Faculty members, Research Associates, Visiting Professors, Teaching Assistants, Special Teaching Staff)
- b. Administrative Staff members employed under any employment status (permanent employees, employees with fixed-term or open-ended contracts, hourly employees and employees with contracts).
- c. Students
- d. Suppliers
- e. Contractors
- f. Job applicants
- g. Prospective students
- h. Other persons who trade or cooperate with the University.

## 5. Useful terms and concepts

*“Unwanted Behaviour”* is any behaviour that is unpleasant and offensive to a person. It does not matter if such behaviour is single or repeated. Furthermore, it does not matter how the perpetrator perceives his / her behaviour towards the recipient, or what the intention of the perpetrator was, nor does the recipient of the behaviour need to inform the perpetrator that his / her behaviour is unwanted.

It is understood that even if the behavior itself is acceptable and not undesirable by other employees or was previously considered an acceptable feature of the work environment, does not negate the term undesirable behavior as defined above.

*“Competent authority”* for the purposes of the Code of Practice is responsible for handling complaints or grievances regarding incidents of harassment or sexual harassment and take measures to prevent and deal with such incidents. It is the responsibility of the competent authorities to provide adequate training in the prevention and treatment of incidents of harassment or sexual harassment.

Competent Authorities at the University are:

- Rectorate authorities
- Deans of Schools
- Heads of Departments
- Members of the University Equality Committee
- Director of Administration and Finance
- Library Director
- Heads of Services.

All of the above must comply with and apply the Code of Practice and specifically:

- a. Rectorate authorities, University Council Members, Deans, Heads, Directors, Supervisors, students and employees must refrain from committing acts of sexual harassment or harassment.
- b. All of the above have a role to play in contributing to the creation and maintenance of a University environment (for staff and for students) in which harassment and sexual

harassment are unacceptable. They should ensure that their standards of conduct do not cause offense and should discourage unacceptable behavior on the part of others.

- c. Rectorate Authorities, University Council Members, Deans, Heads, Directors, Supervisors must ensure that employees, students, collaborators such as suppliers, prospective employees, prospective students and others related to the University are not subjected to or engage in sexual harassment and harassment by any member of their staff, including their superiors or vice versa.
- d. Rectorate Authorities, University Council Members, Deans, Heads, Directors, Supervisors must take the appropriate measures required, according to the Code, when cases of harassment and sexual harassment that occur in their sector come to their knowledge.

*“Gender discrimination”* means any direct or indirect discrimination, including sexual harassment or less favorable treatment, as a result of rejection of such behavior or submission to it. “Gender discrimination” includes any less favorable treatment of a woman related to pregnancy, childbirth, lactation, motherhood or illness due to pregnancy or childbirth, whereas any instruction or order to discriminate against a person on grounds of gender is discrimination.

*“Harassment”* is an unwanted by the recipient behavior related to his/her gender or sexual orientation, which has the purpose or effect of insulting his/her dignity, especially when creating an intimidating, hostile, degrading, humiliating, or aggressive environment.

“Sexual harassment” is any unwanted by the recipient behavior of a sexual nature, which has as its purpose or effect the offense of his/her dignity, especially when creating a humiliating, intimidating, hostile, degrading or aggressive environment during employment or vocational education or training or access to employment or vocational education or training, and is expressed in words or deeds. Components of the terms “harassment” and “sexual harassment” are:

- Unwanted behavior
- Gender-based behavior and behavior of a sexual nature respectively
- Behavior that can reasonably be considered, under the circumstances, as offensive, intimidating and humiliating by the recipient and which creates a hostile work environment.

*“Behavior of a Sexual Nature”* is any behavior that has a sexual element or tone or allusion and is manifested in actions or words. Examples of behavior of a sexual nature are (but are not limited to) the following:

*“Behavior expressed by actions”* is any unwanted physical contact, aimed at attacking or pressuring for sexual intercourse.

*“Behavior expressed in words”* may include unnecessary or unwanted intimacy, sexual or immoral or offensive comments or sex talk, jokes or gestures, immoral or offensive comments about gender or sexual orientation, steering discussions toward sexual issues, description of sex life in front of other people, unwanted and immoral proposals or suggestions, suggestions or pressure for sexual acts, indiscreet questions about personal or

sexual life, sexually implied or obscene comments, insults, obscene remarks, annoying flirting and constant proposals for social activity outside the workplace, while having made it clear that these proposals are undesirable.

*"Non-verbal behavior"* may include the display of pornographic magazines, obscene images or objects, whistles, sly glances or stares, sexual or obscene movements, signals and gestures with eyes, hands or tongue, unnecessary advance or unnecessary very close physical distance, texting via mobile phone or other media with offensive content or sex talk.

*"Quid pro quo sexual harassment"* is the behavior whereby a supervisor, hierarchically superior or teacher attempts to influence working conditions, promotion, training, salary increase, benefits of an employee or a candidate for a job or grade, graduation of student or admission of prospective student in exchange for sexual favors.

*"Sexual favoritism"* is the behavior of a person in a position of power who rewards only those who respond to his/her sexual propositions, while those who do not respond are deprived of promotion, benefits or grades (while deserving them).

The intent of the perpetrator, whatever it may be, is completely unacceptable and condemnable. Even individual behavior may constitute sexual harassment or harassment. Different people may react differently to a particular behavior. But this does not constitute a defense for the perpetrator of the conduct or a mitigating factor for the competent authority. What matters is that one of the recipients of the behavior reasonably perceived it as unpleasant or offensive, unwelcome or intimidating or humiliating or aggressive to his/her person.

## 6. Sexual Harassment and Harassment constitute prohibited discrimination on grounds of gender

Gender discrimination at work, employment, education and vocational training is prohibited. Both sexual harassment and harassment are prohibited.

It is forbidden, in particular, that a member of the community of the University, and generally of all the persons mentioned in point 4 above, commits an act, single or recurring, which consists in:

- Harassment
- Sexual harassment
- Direct or indirect adverse treatment due to repulsion of harassment or sexual harassment or due to a complaint about harassment or sexual harassment.

Any such act, if it is subject to the provisions of the relevant law, constitutes criminal offense and the recipient (male or female) of sexual harassment and harassment can report it to the Police.

Sexual harassment, harassment and direct or indirect adverse treatment, due to repulsion of sexual harassment or harassment or due to submission of a relevant complaint, are prohibited in relation to:

- Access to employment or job position, permanent or temporary, fixed-term or open-ended, full- or part-time, continuous or not, at all levels of the professional hierarchy;
- The definition and application of the terms and conditions of work, of criteria for placement or tenure, transfer or relocation, secondment or promotion;
- The terms and conditions of dismissal from any job;
- Access to all forms and levels of professional guidance, vocational education and training or apprenticeship, vocational training and retraining, training for change of profession or work and the terms and conditions of their provision.

Harassment and sexual harassment are prohibited in regard to:

- Education, vocational training, internship, training
- Access to a job or employment position at the University or to a promotion
- Transfer, relocation, secondment.

The prohibition of harassment and sexual harassment in the workplace is absolute as well as within the activities outside the workplace and working hours, which are related to work at University, such as e.g. in professional seminars and trips, social / cultural / professional events or leisure meetings of employees and students at the University. The members of the University have a “right to equal treatment” regardless of their gender and sexual orientation in relation to:

- Access to education, vocational education and training, along with the terms and conditions of their provision;
- The terms and conditions for the performance of their duties, including their promotion;
- The terms and conditions of dismissal;
- Membership and participation in workers’ organizations.

Harassment or Sexual Harassment by the following persons are prohibited:

- University Council Members
- Rectorate authorities / Director of Administration and Finance / Head of administrative services
- Students
- Any other employee at the University
- Any other collaborating with the University.

## 7. Forms of sexual harassment and harassment

“Behaviour of a sexual nature”, which is considered by the recipient as unpleasant, offensive, intimidating or humiliating or aggressive, may be manifested as follows:

- **Verbal behaviour**, unnecessary intimacy, sexual comments, jokes and gestures, derogatory language of a gendered nature, immoral and offensive comments about gender or sexuality orientation, steering discussions toward sexual issues, description of sex life in front of other people, unwanted suggestions, hints and tips, indiscreet questions about personal or sexual life, sexual innuendo, insults, invitations for dating or sexual intercourse, confession, sex talk, compliments, flirting.



- **Non-verbal behaviour**, persistent or lustful looks, sly meanings, unwanted touching on clothes, hair or other parts of the body, pinches, caresses, kisses, whistles, unnecessary advance / very close physical distance, not accidental, sexual movements, gestures in a sexual manner.
- **Monitoring of personal life**, attempts to channel sexual material such as pictures, magazines, videos.
- **Other forms of behaviour**, written love talk or letters with love and sexual content, related phone calls, text messages and emails, fax, showing photos, posting pictures, posters or sexually explicit films.
- **Sexual harassment as an exchange**: forcing one party to sexual intercourse in exchange for hiring, promotion or salary increase or threat that if the proposal for sexual intercourse is not accepted, there will be a salary or dismissal of the person.
- **Hostile environment**: interfering with the victim's work performance in an irrational manner and creating or exposing the victim to a hostile, uncomfortable and rude environment.

The behaviours and actions mentioned above are indicative and not restrictive.

Sexual harassment and harassment due to gender/sexual orientation can manifest in various ways (see Annex I).

## 8. Instructions to all individuals in the community of the University on the prevention and treatment of sexual harassment and harassment

### A. Guidelines for the Prevention of Sexual Harassment and Harassment

- Seek comprehensive and objective information on legislation concerning harassment and sexual harassment and protection mechanisms
- Take part in actions and programs to combat the causes of gender discrimination, stereotypes and prejudices that perpetuate harassment and sexual harassment
- Avoid discussions, comments, hints, gestures, expressions that target gender, sexual orientation or gender identity of anyone or have gender, sexual orientation or gender identity as a reference point
- Correct your behavior when you realize it annoys or offends another person and do not hesitate to apologize
- Set your individual boundaries for others when you have indications of behavior that annoys or offends you
- Cooperate with the competent authority for improving work / student environment and implementing the Code of Practice.

### B. Guidelines for dealing with harassment and sexual harassment

Recipients of harassment or sexual harassment often try to ignore or hide it. Avoid this defensive, tolerant, harmful and dead-end practice and:

- Do not ignore or underestimate the unpleasant feelings it causes you
- Trust your perception of the behavior of the person harassing you
- Do not feel uncomfortable, ashamed or blame yourself for the behavior of the perpetrator (man or woman)
- Do not choose to isolate yourself from others

- Do not justify the behavior of the perpetrator (male or female).

Take responsibility to act properly:

- Set your limits to the perpetrator (male or female)
- Reject or deal calmly and decisively with his/her behavior
- If this person, despite your best efforts, continues to harass or sexually harass you, tell a trusted person and talk to your family as well
- Keep a diary with details of incidents of harassment or sexual harassment
- Inform the competent authority
- Submit a written complaint to the competent authority or body stating specifically and objectively what has happened, when and where.
- Consult the Commissioner for Administration and the Protection of Human Rights, as an Agency for Equality and Anti-Discrimination, or the Gender Equality Committee in Employment and Vocational Training or the Inspectors of the Department of Labour of the Ministry of Labour, Welfare and Social Insurance.

## 9. Duties and responsibilities of the Competent Authority

### A. Ensuring a decent working environment

Each Competent Authority:

- Recognizes that harassment and sexual harassment are forms of gender-based violence and that are prohibited as gender discrimination in the workplace.
- Has a legal responsibility to ensure a safe, dignified, healthy and friendly working environment.
- Has the responsibility to prevent and deal with harassment and sexual harassment.

In particular, each Competent Authority:

- Protects employees and students at the University from any act that constitutes discrimination on grounds of gender and in particular from any behavior that constitutes harassment or sexual harassment, as well as from any act that constitutes direct or indirect adverse treatment due to repulsion of harassment or sexual harassment or due to submission of a relevant complaint/testimony.
- Has an obligation to the employee and the student who has been harassed or sexually harassed and/or directly or indirectly abused as a result of rejecting such conduct or submitting a relevant complaint, as soon as they become aware of the behavior or its consequences, to take any appropriate measures for its cessation and non-recurrence as well as for the removal of its consequences.

Otherwise, the Competent Authority is co-responsible with the person who committed the prohibited acts in question.

### B. Measures of the Competent Authority for the prevention of harassment and sexual harassment

- Each Competent Authority communicates the Code of Practice to the employees and students of the University, in writing or otherwise, and ensures that sexual harassment in the work environment is not acceptable, taking action in any case where an employee or student does not comply.

- Ensuring a work environment that is accessible, safe and friendly, where relationships between employees and between members of the community of the University are characterized by mutual respect, courtesy, honesty, understanding, trust, cooperation and the support.
- Offers education and training programs for members of the community of the University on prohibited discrimination, the importance of combating and eliminating it, as well as stereotypes that perpetuate and reproduce discrimination, gender-based violence, sexual harassment, harassment, inequality at work, relevant legislation and the benefits from their observance / implementation.
- Establishment of an “Equality Committee”, to monitor the implementation of the Code of Practice, evaluate its effectiveness and submit suggestions to each Competent Authority for measures that may be deemed necessary for the improvement and organization of the programs in question. The Equality Committee should also regularly organize training seminars and other information material for members of the community of the University and cultivate good cooperation with relevant committees within the University and entities outside the University.
- Encourage members of the community of the University to collaborate with the Equality Committee, to contribute to its activities and to express their views on programs and measures to prevent and combat sexual harassment and harassment, and their performance in relation to the work environment.

## 10. Submission and examination of complaints

The University has established clear procedures for dealing with harassment and sexual harassment. These procedures ensure that problems are resolved promptly and effectively. The process of resolving any such problem can take either informal or formal form.

### A. Internal / informal procedure

The internal process aims to investigate and deal with incidents within the University:

- The complainant addresses the Competent Authority that s/he wishes and submit his/her complaint in writing.
- The Competent Authority records the history of the incident and investigates the possibility of direct communication or mediation.
- Depending on the history, and after written consent by the complainant, the Competent Authority either (a) encourages the complainant to explain to the person causing the unwanted behavior that it is not welcome, that it is offensive, that creates dissatisfaction and that interferes with his/her work/study, or (b) undertakes mediation.
- The Competent Authority only takes action if the harassment and/or sexual harassment occurs for a short period of time, and if the alleged perpetrator seems willing to discuss and only if the complainant welcomes the mediation.
- In case the complainant chooses direct contact with the alleged perpetrator, then the Competent Authority has the responsibility to monitor its outcome.
- In case of mediation, the Competent Authority assumes the responsibility communication with the alleged perpetrator.

- In each case, the Competent Authority handles the case in full confidentiality and ensures its completion within a reasonable time.

The Competent Authority ensures that the internal / informal procedure for handling grievances (informal complaints) of harassment or sexual harassment:

- Is clear, has been explained and is understood by all members of the community of the University;
- Is carried out with confidentiality and objectivity;
- Provides satisfactory guidance and support to the complainant;
- Approaches and treats the complainant and the accused with respect;
- Neither the complainant nor the accused are victimized;
- No witnesses are victimized;
- Produces results within a reasonable time from the date of submission of a complaint;
- Encourages the complainant to report incidents that constitute harassment or sexual harassment either verbally or written;
- Recommends to the complainant to carefully keep any information available to him/her regarding his/her behavior and the behavior of the accused;
- Ask the complainant if he/she wishes to deal with the situation himself / herself or if he/she needs the assistance of the Authority;
- Informs the complainant of his/her right to submit a formal complaint.
- If necessary, and without stigmatization of those involved, professional cooperation between them is avoided and/or they are removed from each other if they are at nearby offices or on the same floor.

The internal/informal procedure **does not concern the submission of a formal complaint (to the police or state institutions)**. It concerns the submission of a grievance or informal complaint (within the University) and it does NOT in any way replace the formal procedure for filing and examining a complaint of harassment or sexual harassment. The complainant may, at any stage internal/informal procedure, if he/she so wishes, proceed with an internal/formal procedure and with a relevant complaint to the state institutions or the taking of legal action.

### **B. Internal/Formal Procedure**

To begin the formal process of examining a complaint about sexual harassment or harassment, a relevant complaint must be submitted in writing by a member of the community of the University, to the relevant competent bodies or to the relevant disciplinary committee. The submitted complaint will be examined according to the procedures provided for in the Laws and Regulations that are in force and applied by the University, for disciplinary control of the members of the Academic Staff, the members of the Administrative Staff and Students, depending on where the complainant belongs.

It is understood that in any case, harassment or sexual harassment can be reported to the Police, which will conduct a relevant investigation in relation to the commission of a criminal offense.

### **C. Criminal and civil proceedings**

A victim of sexual abuse has the right to bring separate criminal or civil charges against an alleged perpetrator; the legal rights of the victim are in no way restricted or affected from the Disciplinary Regulations and Rules of the University and this policy.

## 11. State institutions and other bodies for filing a complaint

Complaint of harassment or sexual harassment may also be submitted to the following institutions:

- Commissioner for Administration and the Protection of Human Rights  
Agency for Equality and Anti-Discrimination.  
Address: Era House, Diagorou 2,1097, Nicosia.  
Tel.: 22405500/501  
Website: [www.ombudsman.gov.cy](http://www.ombudsman.gov.cy)  
E-mail address: [ombudsman@ombudsman.gov.cy](mailto:ombudsman@ombudsman.gov.cy)
- Gender Equality Committee in Employment and Vocational Training.  
Address: Klimentos 9, 3rd floor, office 312, Nicosia.  
Tel.: 22400894/5  
Website: [www.eif.gov.cy](http://www.eif.gov.cy)  
E-mail address: [genderequalitycommittee@mlsi.gov.cy](mailto:genderequalitycommittee@mlsi.gov.cy)
- Inspectors of the Department of Labour, Ministry of Labour, Welfare and Social Security.  
Address: Klimentos 9, 4th floor, Nicosia.  
Tel.: 22400801  
E-mail address: [director@dl.mlsi.gov.cy](mailto:director@dl.mlsi.gov.cy)

Complaints can also be submitted:

- To the trade unions
- To organizations/bodies promoting gender equality



**EQUALITY  
COMMITTEE**

Respect the individual

## ANNEX I

### Indicative examples of sexual harassment

- Offensive or unnecessary touches and caresses on any part of the body.
- Gestures with any part of the body or signals with the eyes, the mouth, etc.
- Immoral or insulting proposals
- Comments on motherhood and its acquis (e.g. leave, concessions)
- Comments or descriptions about the family situation, the costume design code or appearance
- Comments about one's body, face, sexual orientation, sexual performance or sexual defects
- Innuendo that offends sexual dignity
- Written or oral insults of sexual content
- Written or oral sex talk
- Showing images, photos, movies, messages etc. of sexual content in any way or medium, digital (e.g. e-mails, SMS, etc.) or not
- Request or demand for sexual favors, especially with the promise of recruitment, promotion, non-dismissal, etc.
- Remarks sexually suggestive
- Rerogatory remarks about gender or appearance
- Questions about sexual behavior or narration of sexual experiences to the victim
- Violation of privacy, inside or outside work, such as e.g. harassing phone calls
- Physical assault of sexual content and coercion into sexual intercourse
- Jokes or teasing of sexual content
- Continuous invitations to dinner or outings despite their rejection by victim.

However, it should be noted that it is normal and expected in a contemporary work environment where employees spend much of their day, to engage in social activities in addition to their professional ones. In fact, many couples met at work. The same is true for students. What should be emphasized is the undesirable behavior.

None of the above behaviors constitute sexual harassment if it is not undesirable by the recipient or if it is not of a form and nature that offends the dignity of men and women. If the behavior is acceptable and is manifested with the consent of the parties, then there is no question of sexual harassment. It is clear that the intention (good or bad, innocent or guilty, suspected or unsuspecting) of the perpetrator is completely indifferent and insignificant. Good intentions do not negate a behavior that constitutes sexual harassment.

ANNEX II



**Confidentiality Statement**

"I understand and acknowledge that the process of investigating the complaint by ..... against ..... with regard to alleged sexual harassment, is absolutely confidential. I undertake the obligation not to report anything to anyone, inside or outside the University, either an part of the complaint or the existence of the complaint itself or any aspect of the ongoing process, either now or at any time in the future.

I also understand the obligation, as far as I can, to prevent the leakage of any information regarding the above and, if I have the ability, to prevent the acquisition of knowledge by any third party. If I do not honor this commitment, I will be subjected to disciplinary action not excluding dismissal / expulsion as a student.



.....  
*Date*

.....  
*Name and Signature*