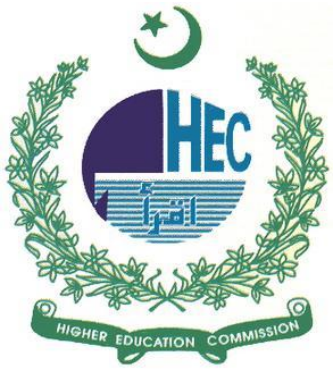


THE HIGHER EDUCATION COMMISSION

POLICY ON PROTECTION AGAINST SEXUAL HARASSMENT IN HIGHER EDUCATION INSTITUTIONS

[Revised January 2024]

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HIGHER EDUCATION COMMISSION

POLICY ON PROTECTION AGAINST SEXUAL HARASSMENT IN

HIGHER EDUCATION INSTITUTIONS

1. PRINCIPLES AND PURPOSES OF THE POLICY

1.1. Higher Education Institutions ("HEIs") are highly consequential institutions in society that are dedicated to the pursuit and dissemination of knowledge. Members of the HEI community have several important rights and privileges, central among which is the right to pursue inquiry and search for knowledge without hinderance from unlawful or otherwise unacceptable constraints. The Higher Education Commission (the "HEC"), which has been mandated by law to prescribe conditions under which HEIs in the country may be opened and operated, takes very seriously the freedom of teachers, researchers, scholars, students and other members of the HEI community to live and work in a safe environment in which their dignity is protected.

1.2. Protection against sexual harassment is important not only because it threatens the freedom and conduciveness of the environment at institutions of higher learning. At a more fundamental level, such conduct is unacceptable because it violates personal dignity and shall not be tolerated at HEIs in Pakistan under any circumstance.

1.3. In accordance with the terms of this policy, sexual harassment shall be prohibited at HEIs in Pakistan, and shall constitute a punishable offence under the policy. The HEC affirms the right of every member of the HEI community live, study and work in an environment that is free from sexual harassment. 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.

1.4. All administrators, deans, managers, faculty, department chairs, directors of schools or programs 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. HEIs are encouraged to formulate internal policies that further strengthen or expand the protections available under the HEC's policy on sexual harassment.

1.5. This policy has been made pursuant to the powers granted to the HEC under the Higher Education Commission Ordinance, 2002, and is binding on all higher education institutions in the country, whether operating in the public or private sectors. Violations or failure to comply with the HEC's policies may lead to regulatory action being taken against non-compliant HEIs.

1.6. 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 the HEI community, and provides the option to aggrieved persons to seek recourse to resources within the HEI or to seek redressal through the provisions of the 2010 Act.

2. PROHIBITED CONDUCT

2.1. "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:

a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual participation in any activity at the HEI;

b) Submission to or rejection of such conduct by an individual is used as a basis for academic or employment decision affecting that individual; or

c) 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.

2.2. 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 (see Annex 1 for examples of various manifestations).

2.3. The following behaviors are specifically prohibited under this policy. This following are meant to provide specificity to the definition provided in clauses 2.1. However, it is not an exhaustive list, and other behaviors that fall within the scope of the definition above shall also be prohibited.

a) ***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 HEI administration has a special obligation to take preventative measures, offer immediate assistance and take interim measures when required.

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

c) ***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.

d) ***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.

e) ***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 adversetreatment as lower salary or grades, or more severe punishment) of person(s) on the basis of sex or gender.

2.4. 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.

2.5. 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 HEI if the act qualifies as a prohibited act under the policy.

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

2.7. 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.

3. JURISDICTION

3.1. This policy applies to actions by students, faculty, staff, other members of the HEI community (such as interns, residents etc.), or third parties (such as service providers, visitors etc.), who may be male, female or transgender persons, when the misconduct occurs:

a) on the HEI property (i.e. on campus) or in its immediate vicinity;

b) off the HEI property, if (i) the conduct occurs in connection with an HEI recognized program or activity or (ii) the conduct may create a hostile environment or pose a safety risk on campus; and

c) using the university's computing or network resources accessed from an off-campus location, which shall be deemed to have occurred on campus.

4. DESIGNATED RESOURCES

4.1. The HEI shall designate at least two members of the HEI 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 such individuals shall be easily available, including on the HEIs website.

4.2. The HEI shall also constitute an Inquiry Committee to investigate and adjudicate any allegations of prohibited conduct (the "Inquiry Committee") in accordance with the provisions of Section 7 below. Those who have experienced sexual harassment may also contact members of the Inquiry Committee for support and advice.

5. COMPLAINTS AND REPORTING

5.1. A complaint may be lodged by any person who has experienced sexual harassment as defined in Section 2 (Prohibited Conduct) read with Section 3 (Jurisdiction) of this policy, with either the Focal Person or with any member of the Sexual Harassment Inquiry Committee.

5.2. In cases in which the conduct in question falls within the scope of the 2010 Harassment Act, the affected person shall also have an option to submit a complaint to the Ombudsperson in accordance with the provisions of the 2010 Harassment Act.

5.3. In the event that a complainant is reluctant to contact the Focal Persons or any members of the Inquiry Committee, the complainant may contact a colleague, instructor, the employment supervisor, manager, department chair, dean or VC. It will be the responsibility of the individual contacted to report the case to the Inquiry Committee without identifying either the complainant or the alleged offender and to ask for advice on procedure and policy from them to effect solution, if a solution is necessary.

5.4. Complainants shall be encouraged to submit complaints promptly, preferably within 3 months but no later than 12 months from the last date of the alleged harassment. An extension of up to 1 year may be granted by the Focal Persons or the Inquiry Committee upon written request stating the reasons for the delay in submitting the complaint.

5.5. All members of the HEI community are encouraged to report any instances of sexual harassment that they may have observed to the Focal Persons or the Inquiry Committee. For the purposes of safeguarding the campus community, HEIs have an obligation to investigate material violations of this policy even in the event that a formal complaint has not been filed.

5.6. As soon as a complaint or report is received by one of the designated resources, it shall be shared by him or her (within a period of 24 hours) with all Focal Persons and members of the Inquiry Committee for further action.

5.7. For minor violations, complainants may opt to make an informal complaint to either the Focal Person or the Inquiry Committee. The primary objective of informal resolution mechanism is to take preventative action, so that minor violations are detected early and 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 2 of this policy, the Inquiry Committee shall deal with the complaint accordingly.

6. INTERIM MEASURES AND SPECIAL ARRANGEMENTS

6.1. As soon as a complaint or report is received by designated resources or any member of the HEI administration, depending on the nature and seriousness of the offence, 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 Committee for necessary action. Interim measures include but are not limited to:

a) adjustment in class or examination schedules, including for the purposes of attending hearings;

b) access to counselling services or other appropriate medical assistance;
c) change in the work assignments;
d) arrangement for any assessments or evaluations to be made by a neutral person;
e) adjustment to class schedule, including withdrawal from course or changing the section;
f) notifying the campus security officials (or law enforcement in case of serious violations) regarding the violation;
g) impositions of a HEI wide order designed to prohibit contact or communication between certain persons;
h) change of the housing arrangement of certain persons; or
i) any other measures that may be deemed appropriate.

7. INQUIRY COMMITTEE

7.1. The Inquiry Committee shall be responsible for the investigation and adjudication of any complaint received in connection with the violation of this policy.

7.2. The Inquiry Committee shall be constituted in the following manner:

a) The committee 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 the HEI.

b) All members of the committee shall be employees of HEI and will be appointed by the Vice Chancellor (the "VC") after the VC has taken nominations from senior members of the HEI administration. The VC may co-opt one or more members from outside the HEI if it is otherwise not possible to designate three members as described above.

c) Members of the Committee shall be individuals who are known for being principled, credible, fair, gender-sensitive and have a strong character (someone who will not change their decision due to pressure from friends, colleagues or seniors). They shall have not conflict of interest in particular cases, and shall be impartial and unbiased.

d) Members of the Committee shall be appointed for a term of two year (shorter terms may be required occasionally to fill vacancies). No member shall serve for more than two consecutive terms. Former members will be eligible for reappointment after a lapse of two years.

e) One of the members of the committee shall be appointed as the Chair by the VC, 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 VC. All these duties shall be undertaken in consultation with the Committee members.

f) 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.

7.3. The HEI shall endeavor to provide training to members of the Inquiry Committee in investigation and adjudication of conduct prohibited under this policy.

7.4. An HEI staff member shall be appointed to assist the Inquiry Committee. 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 complaints, and ensuring appropriate awareness raising about the issue of sexual harassment at HEI.

8. INVESTIGATION AND ADJUDICATION

8.1. All complaints alleging Sexual Harassment shall be forwarded to the Inquiry Committee within 24 hours of being received by the Focal Persons or any other office of the HEI.

8.2. As soon as is reasonably practicable after receiving a complaint, the Inquiry Committee shall determine whether the alleged conduct in the complaint meets the criteria set forth in Sections 2 (Prohibited Conduct) and Section 3 (Jurisdiction) of this policy. If it is determined by a majority of the members of the Inquiry Committee that the alleged conduct meets the aforementioned criteria, a formal investigation shall be initiated.

8.3. In the absence of a formal complaint, if a serious violation of this policy is reported to the Inquiry Committee, or a series of allegations against the same person are received, the Inquiry Committee may determine by majority vote to initiate proceedings after notifying the VC.

8.4. After initiating the investigation, and not later than three days of the receipt of a written complaint, the Inquiry Committee shall:

a) communicate to the accused the charges and statement of allegations leveled against him/her, the formal written receipt of which will be given;

b) require the accused within seven days from the day the charge is communicated to him/her to submit a written defense and on his/her failure to do so without reasonable cause, the Committee shall proceed exparte; and

c) enquire into the charge and may acquire and examine such oral or documentary evidence in support of the charge or in defense of the accused as the Committee may consider necessary (including by summoning potential witnesses) and each party shall be entitled to crossexamine the witnesses against him/her.

8.5. The following rules shall be applicable to the hearings conducted by the Inquiry Committee:

a) All hearings shall be closed hearings;

b) The Inquiry Committee will hear statements from the complainant(s) and respondent(s), the witnesses if any (as required) and study any other documents and/or evidence as presented by the relevant parties or collected in the process of conducting inquiry;

c) The Inquiry Committee shall have discretion to limit testimony and questioning of witnesses to those matters it considers relevant to the disposition of the case;

d) The Chair of the Inquiry Committee shall have the power to compel a witness to attend, and the complainant(s) and/or respondent(s) may request the Chair's aid in this regard;

e) The complainant and the respondent may at any stage of any of the procedures outlined in this policy be represented and/or accompanied by another person of her/his choice.

f) The Committee shall have the right to acquire any relevant piece of evidence to further their understanding of the case and the relevant parties, witnesses and administration are required to provide them with this documentation and/or evidence to facilitate the investigation;

g) Objective documentation of the proceedings of the Inquiry Committee shall be maintained where high confidentiality of the records and other such material shall be upheld at all times;

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

i) Where any procedural matter is not dealt with in this policy, the Inquiry Committee may, guided by the principles of fairness, establish any appropriate procedure.

8.6. Members of the HEI community have an obligation to 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 HEI may be obligated to proceed with the investigation.

8.7. Following the formal hearing, the members of the Inquiry Committee 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 criteria on which a judgment can be made. The credibility of statements and context must be kept in mind during the deliberations. The committee members will reach a decision unanimously or by a majority after the deliberations. Where the complaint is found to be valid, the Committee will recommend an appropriate penalty.

8.8. The Inquiry Committee shall complete the inquiry and recommend its final decision within a period of 30 days. It shall then send its decision to the VC giving its findings in writing by recording reasons thereof (which shall include any note of dissent) for endorsement and action. Recommendation of the Inquiry Committee shall be implemented within seven days.

9. CONFIDENTIALITY

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

9.2. The Focal Persons, members of the Inquiry Committee and their support staff shall be subject to administrative disciplinary action for inappropriate breaches of confidentiality on their part.

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

10. PENALTIES

10.1. In cases in which the respondent is a student, the following sanctions may be imposed:

a) In case of minor violations, the student may be issued a warning or reprimand. These shall be considered when adjudicating future violations.

b) In case of more serious violations, the following formal sanctions may be imposed: disciplinary probation, withholding of degree for a period of time, suspension or expulsion.

c) The following may be added to any of the penalties listed above: campus service; relocation from campus housing; exclusion of the respondent from a designated portion(s) of HEI buildings or grounds, or from one or more HEI designated activities, (provided such penalty is appropriate to the offence and where the penalty does not prevent the respondent from pursuing her/his studies); attending educational program; inclusion of decision in the student's record, except in the case of the first instance of a minor violation (for up to seven years).

10.2. In cases in which the respondent is a member of the faculty, researcher or employee/staff of the HEI, the following sanctions may be imposed (individually or in combination), keeping in view the terms of the applicable employment policies:

a) oral or written reprimand;
b) counselling or training;
c) inclusion of the decision in a specified personnel file(s) of the respondent;
d) exclusion of the respondent from a designated portion(s) of HEI buildings or grounds, or from one or more designated HEI activities, where such penalty is appropriate to the offence and where the penalty does not prevent the respondent from carrying out her/his professional duties;
e) the imposition of a fine;
f) recommendation for suspension of the respondent without pay;
g) recommendation that dismissal proceedings be commenced; or
h) other sanctions, as deemed appropriate, in accordance with the terms of the employment policies.

11. RIGHT OF APPEAL

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

11.2. In cases in which the conduct falls within the scope of the 2010 Act, the aggrieved party shall have an option to file an appeal to the Ombudsman in accordance with the provisions of the 2010 Act.

11.3. There shall be a three-member appellate body (the "Appellate Body") appointed by the VC that shall include at least one senior member of the HEI administration (at the level of dean or equivalent) and at least one of the members of which shall be a woman. No member of the Inquiry Committee shall concurrently be a member of the Appellate Body. In case the complaint had been made against one of the members of the committee, that member shall be replaced by another (impartial member) for that particular case.

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

a) the alleged conduct does or does not fall within the scope of this policy;

b) the Inquiry Committee reached a decision without consideration of material information;

c) the imposed penalty is unfair because it is disproportionate or materially different from that imposed for similar misconduct; or

d) the adjudication process followed by the Inquiry Committee was procedurally unfair.

11.5. In order to reach its decision, the Appellate Body may communicate with the parties, the members of the Inquiry Committee or other members of the HEI community as it deems fit.

11.6. 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 VC and the Inquiry Committee.

12. MALA FIDE ALLEGATION

12.1. False allegations of sexual harassment made out of malice or intent to hurt the reputation of the persons against whom the complaint is filed are to be dealt with as serious offences. Making mala fide allegation of sexual harassment knowing it to be false, whether in a formal or informal context, is a serious offense under this policy.

12.2. In the event that the Inquiry Committee determines that a false allegation made in the complaint with mala fide intent, it may recommend appropriate action against the complainant by sending its findings to the VC (by recording reasons thereof and including any note of dissent) for endorsement and action. In cases in which the conduct falls within the scope of the 2010 Act, the Inquiry Committee may recommend the handing over of such cases to the 12 Ombudsperson for taking further action against the complainant who made the false allegation with mala fide intent.

13. PROTECTION AGAINST REPRISAL

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

13.2. Retaliation or any other action against complainant of sexual harassment is to 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.

14. SPECIAL CONSIDERATIONS REGARDING RELATIONSHIPS BETWEEN INDIVIDUALS

14.1. In contrast with sexual harassment, personal relationships among consenting adults of the HEI community that do not breach the social and cultural norms of the society are, in general, a private matter.

14.2. Under the policy it is highly inappropriate for any member of the community 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.

15. EDUCATION FOR PREVENTION

15.1. To ensure prevention of sexual harassment on campus, HEIs should 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.

15.2. The HEC's Sexual Harassment Policy, any of the university's internal policies as well information regarding the 2010 Act shall be:

(a) available on the HEI website;

(b) be a part of the package that all new hires receive;

(c) be a part of orientation of new students and included in any written material given to them;

(d) be included in the HEI's Prospectus (a summarized version); and

(e) displayed in prominent locations on campus

15.3. The names of the Focal Persons and the members of the Inquiry Committee shall be made visible/accessible to the HEI community through its website, posted on notice boards, etc.

15.4. The HEI 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 HEI. This will be an ongoing activity.

15.5. All departments at HEI 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.

ANNEX 1

EXAMPLES OF SEXUAL HARASSMENT CASES AT HEIs

A. Actual Reported Cases

The following is a list of actual reported cases that are provided as examples of what constitutes sexual harassment.

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 supervisor/authorities in-charge out of the HEI premises with the promise of improvement in grades.

c. Financial and sexual gratification from graduate students (PhD, M-Phil, Masters) by their supervisor.

d. Unwelcome sexual advances, whether or not they involve physical touching.

e. Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life.

f. Comments on an individual's body, comments about an individual's sexual activity, deficiencies, or prowess; displaying sexually suggestive objects, pictures, or cartoons.

g. Unwelcome staring, whistling, brushing against the body, sexual gestures, or suggestive or insulting comments.

h. Inquiries into one's sexual experiences.

i. Discussion of one's sexual activities (even if males are discussing this it is done deliberately in front of female students or colleagues).

j. Using derogatory and abusive language that refers to others mother's or sister's bodies.

k. Acts of sexual connotation relating to the same as a common usage in conversation.

B. Types and Examples

The following list provides further examples of actual reported or common cases by category:

1. Misconduct by Teachers

a. Male Teacher asked the Female student, if you want "A" grade, you need to take your final exam at my home.

b. Male head of the department forced the female subordinate employee by telling her that if she wants her contract extended she needs to spend time with him after office hours.

c. Male HOD deliberately touching or hitting the body of female employee by file or pen/pencil.

d. Male Teacher referring to female bodies and reproductive cycles to embarrass female students during class lectures.

e. Needy female students were given financial support by Faculty member in exchange for sexual favors
f. Students complaints of a teacher telling vulgar jokes during classes which had sexual innuendos
g. Complaints against male supervisor/teacher spending long hours locked away in office with a young female colleague or student.

2. **Misconduct by Students**
   a. A male student making vulgar jokes about a female student on the social media or verbally telling vulgar jokes about her to his fellow students.
   b. Students sending in written notes letters, emails with requests for intimacy
   c. Female student asked the teacher to provide the final grade list of all students. When the teacher refused to do that, the student registered a complaint against the teacher that he tried to hold her hand in parking lot while asking her to meet in private for grade list.
   d. Female student visiting male teacher in his office unnecessarily and spending long hours and initiating intimacy for benefits (of grades, employment or even monetary).
   e. Repeatedly following particular female students around the campus

3. **Misconduct by Employees**
   a. Using vulgar language to address females (student, faculty and other employees)
   b. To touch their intimate parts in the presence of women
   c. Younger faculty member was blocked by Dean of the relevant faculty to get higher education (PhD/Phil) [upon her refusal to comply with his undue demands].
   d. Junior faculty was transferred to another department against her will by the authorities as a punitive measure for not complying with undue requests for (sexual) favors.
   e. Giving extra favors to young female faculty/staff in nominating their names for international/domestic trips for their attention.
   f. Threatening female students by using forged/fake documents and pictures to blackmail them into compliance.
   g. Anonymous letters/pamphlets/e-mails defaming or character assassination of employees/teachers/students.