



## **GCC Sexual Harassment Policy**

Global China Connection (“GCC”) is committed to providing a safe environment for its entire staff, free from discrimination on any ground and from harassment at work, including sexual harassment. GCC will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously, and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including termination of affiliation with GCC. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

### **Definition of Terms:**

**GCC:** Global China Connection, a Washington DC–registered 501(c)(3) non-profit corporation, and its affiliated chapters.

**Manager:** Any Global China Connection staff member or volunteer who serves in a supervisory capacity, including members of Central Management, members of the Board of Trustees, and Chapter Presidents or Acting-Presidents.

### **Definition of sexual harassment**

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents, and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

#### **Physical conduct**

- Unwelcome physical contact including pinching, stroking, kissing, hugging, fondling, or inappropriate touching;
- Physical violence, including sexual assault;
- Physical contact, e.g. touching, pinching;
- The use of job-related threats or rewards to solicit sexual favors

## **Verbal conduct**

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone, messenger, or by email)

## **Non-verbal conduct**

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. GCC recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

GCC recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including GCC staff, clients, volunteers, contractors, or visitors, who sexually harasses another will be reprimanded in accordance with this internal policy. All sexual harassment is prohibited whether it takes place within GCC premises or outside, including at social events, business trips, training sessions or conferences sponsored by GCC.

## **Complaint procedures**

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. GCC recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment, or utilize GCC's anonymous reporting system by emailing [compliance@gccglobal.org](mailto:compliance@gccglobal.org)

When a designated person receives a complaint of sexual harassment, he/she will:

1. Immediately record the dates, times and facts of the incident(s);

2. Ascertain the views of the victim as to what outcome he/she wants;
3. Ensure that the victim understands the organization's procedures for dealing with the complaint;
4. Discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome;
5. Keep a confidential record of all discussions;
6. Respect the choice of the victim;
7. Ensure that the victim knows that he/she can lodge the complaint outside of the organization, through the relevant legal framework.

Complaints arising at the Chapter level will be dealt with in accordance with the above process, with the exception that victims reporting incidents occurring solely within their local Chapter are encouraged to initiate a simultaneous complaint through whatever institutional mechanism exists at their Chapter's host university. GCC stands ready to assist victims in initiating such complaints and/or communicating with university authorities, when necessary.

### **Sanctions and disciplinary measures**

Anyone who, after investigation, has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- Verbal or written warning
- Adverse performance evaluation
- Transfer
- Demotion
- Suspension
- Dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser and reporting to the relevant authorities.

### **Policy Prohibiting Retaliation:**

We recognize that staff may find it difficult to raise complaints about harassment, so we have a policy meant to encourage staff members to come forward with their concerns without fear of retaliation. It is against GCC policy (and may be unlawful) for any staff member to retaliate against another for his/her participation in the complaint process.

Retaliation is when someone penalizes another person for any of the following:

- Reporting what he/she believes in good faith to be harassment and/or a violation of this Policy;

- Expressing an intent to report what he/she believes in good faith to be harassment and/or a violation of this Policy; or
- Assisting another employee in an effort to report harassment and/or a violation of this Policy or participating in any investigation under this Policy.

Retaliating against a co-worker who made a complaint or otherwise participates in the investigation process is grounds for discipline, up to and including termination.

### **Implementation of this policy**

GCC will ensure that this policy is widely disseminated within its network. It will be included in the staff handbook. All new staff must be trained on the content of this policy as part of their induction into the organization.

It is the responsibility of every Manager to ensure that all his/her direct reports are aware of this policy.

### **Supervision and Investigation**

The Board of Trustees may appoint an Ombudsman to serve as an official point of contact and finder of fact for matters relating to the enforcement and implementation of and compliance with this and other policies, as well as any relevant laws and regulations affecting the organization. The Ombudsman shall serve as an entity independent of the Board of Trustees, Central Management, or any Chapter, and will act as a resource for the organization at large. The Ombudsman will not have independent enforcement powers, but will provide recommendations, reports, and findings directly to the Board of Trustees; the Ombudsman shall have the power to investigate any individual or entity within the organization if suspected of wrongdoing or malfeasance. The Ombudsman may be appointed on an ad hoc or permanent basis, and may be removed by the Board of Trustees at any time. While in office, the Ombudsman may not hold any other official role within the organization.

### **Monitoring and evaluation**

GCC recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective. Managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the organization will evaluate the effectiveness of this policy and make any changes needed.