



Anti-Harassment Policy

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Organizational Profile

Bargad is a youth development organization actively working to promote peace, justice and cooperation amongst the youth¹ in Pakistan. The organization has focused on creating opportunities and amplifying the voices of the youth ever since its inception in 1997, leading to a vast network of around 3000 youth volunteers, known as the Bargad Volunteer Network (BVN) throughout the country.

Bargad's Vision:

Politically, socially and economically empowered youth and women, respect, protect and promote peace and harmony

Bargad's Mission:

- a. Engage vulnerable youth and women in all diversity to their full potential through education, mentorship and innovative interventions designed to enhance their overall well-being.
- b. To invest in youth-led and youth-centred ideas, to convene key stakeholders in the sector and advocate for systems and policy changes that meet youths' needs.
- c. Engage youth to end violence against women.

Bargad has implemented more than 100 projects on youth training², youth mobilization and policy advocacy, including the provision of technical assistance to all the provincial governments of Pakistan, regions of Gilgit-Baltistan and the State of Azad Jammu Kashmir (AJK) for the formulation of their respective youth policies. These policies have been approved by the provincial governments of Punjab (2012), Khyber Pakhtunkhwa (2016) and Sindh (2018), and Balochistan (2024) resulting in governments' pledges to allocate 4% budget to sports and youth affairs, 15% on the women employment quota, implementation of the E-Rozgar programs, and on youth participation in the local governments, respectively. Bargad has also conducted Capacity Enhancement workshops on youth development with officials of the youth affairs departments of Punjab, Balochistan and Sindh.

Bargad has a youth network of 782 individuals, civil society organizations and government institutions, with Youth engagements with 64 Universities, 40 Colleges and 35 Higher Secondary Schools.

The organization has previously partnered with 26 membership-based student organizations and 15 Youth Groups over Pakistan; producing the largest pool of researches and publications on

¹ Adolescents: 12-19; Youth age bracket in Pakistan: 15-29

² Since 2003, the organization has trained 7880 youth activists and young faculty only through training workshops and peer sessions in issues of social development.

various aspects of youth than any other civil society organization in Pakistan, while also pioneering a youth track of peace and diplomacy in the South Asian region.

The hallmark of the organization is that its core youth volunteers participate in all aspects of the projects - from action-planning to project execution, while also mapping in the course of its work; issues as well as challenges identified by the youth across the country³.

³ The Youth in the mapping is part of the Youth Cohorts in the districts where Bargad has actively worked or is presently working.

1. Policy Statement

BARGAD is committed to a workplace and work-related environment in which every person is treated with dignity and is protected from harassment, sexual harassment, gender-based discrimination, intimidation, retaliation and victimization. Harassment is prohibited regardless of the identity, position or contractual status of the persons involved.

All complaints will be handled promptly, fairly, confidentially and without retaliation. BARGAD will maintain the statutory redress mechanism required by law and will take reasonable steps to prevent harassment, support affected persons and enforce decisions.

This policy is intended to implement the Protection against Harassment of Women at the Workplace Act, 2010, as amended, and other applicable law. If any provision conflicts with mandatory law, the law shall prevail and this policy shall be interpreted or amended accordingly.

2. Purpose

- define prohibited harassment and related conduct;
- Explain who and what situations are covered;
- provide accessible routes for making a complaint;
- establish the Harassment Inquiry Committee and its procedure;
- protect due process, confidentiality and freedom from retaliation;
- provide for findings, recommendations, penalties, support and statutory appeal rights; and
- Clarify the relationship between harassment complaints and safeguarding, conflict of interest, and other internal procedures.

3. Legal and Policy Framework

This policy shall be read and applied consistently with the Protection against Harassment of Women at the Workplace Act, 2010, including amendments made in 2022, and any applicable federal or provincial law, rules, directions or binding decisions. References in this policy to “the Act” mean the applicable workplace-harassment legislation as amended from time to time.

The statutory mechanism is not displaced by any internal complaint, safeguarding, grievance, disciplinary or governance procedure. A complainant may exercise any right available under the Act, including approaching the Ombudsperson directly where the law permits.

4. Scope

This policy applies to Board members, employees, former employees where covered by law, consultants, interns, trainees, volunteers, students, project personnel, contractors and other persons working for or engaging with BARGAD, whether paid or unpaid.

It applies at BARGAD offices and project sites and to any situation linked to work or organizational activity, including travel, training, field visits, meetings, events, accommodation, transport, online or remote work, electronic communication, social media use connected with work, and interactions with communities, partners, vendors, donors and public institutions.

5. Definitions

Accused: A person against whom a complaint of harassment has been made.

Complainant: Any person who makes a complaint on being aggrieved by harassment and includes any other person covered by the applicable statutory definition.

Competent Authority: The authority designated by BARGAD for purposes of the Act. Ordinarily this is the Executive Director, except where recusal or an alternative authority is required under this policy or law.

Employee: Includes every category covered by the Act, including regular, contractual, temporary, part-time, freelance, intern, trainee, student, apprentice and voluntary personnel, whether remunerated or not.

Harassment: Any conduct falling within the definition in the Act, including: (a) an unwelcome sexual advance, request for sexual favours, stalking or cyberstalking, or other verbal, visual, written or physical conduct of a sexual nature or sexually demeaning attitudes that interferes with work performance, creates an intimidating, hostile or offensive environment, punishes refusal, or is made a condition of employment; and (b) discrimination on the basis of gender that may or may not be sexual in nature and results in discriminatory behaviour.

Inquiry Committee: The standing Harassment Inquiry Committee constituted under the Act and this policy.

Retaliation: Any adverse action, threat, intimidation, pressure, disadvantage or hostile treatment because a person made, supported, reported or participated in a complaint or inquiry.

Workplace: Every place or situation covered by the Act, including any place where services are rendered and any situation linked to work or organizational activity outside the office, including virtual and remote settings.

6. Prohibited Conduct

Prohibited conduct includes, without limitation, conduct meeting the statutory definition of harassment and the following when unwelcome or discriminatory:

- sexual advances, requests, propositions or pressure for sexual interaction;
- sexual, degrading or gender-based remarks, jokes, gestures, images, messages or material;
- stalking, cyberstalking, unwanted monitoring or repeated unwanted contact;
- unwanted touching, physical proximity, assault or other physical conduct;
- making employment, assignment, promotion, benefit or opportunity conditional on submission to conduct of a sexual nature;
- punishing, disadvantaging or threatening a person for rejecting such conduct;
- gender-based discrimination or prejudicial conduct that creates a hostile or unequal work environment; and
- retaliation against a complainant, witness, supporter or participant in an inquiry.

7. Duties and Standards of Conduct

7.1 Everyone Covered by this Policy

- treat others with dignity and respect;
- refrain from harassment, discrimination and retaliation;
- cooperate honestly with an inquiry and preserve confidentiality;
- report urgent risks to safety through an appropriate channel; and
- avoid interfering with, influencing or obstructing a complaint or inquiry.

7.2 Managers and Supervisors

Managers and supervisors shall respond appropriately to concerns, avoid informal fact-finding that could compromise an inquiry, preserve confidentiality, refer complaints promptly to an authorized recipient and take reasonable steps to prevent retaliation or continued harm.

7.3 BARGAD

BARGAD shall constitute the Harassment Inquiry Committee, designate a Competent Authority and a complaint-receiving Secretary, display the statutory Code of Conduct in English and a language understood by the majority of personnel at conspicuous places, communicate reporting channels, and provide appropriate awareness and training.

8. Complaint Channels and Classification

8.1 How a Complaint May Be Submitted

A complaint may be submitted in writing to the Executive Director, the designated Secretary, or any member of the Harassment Inquiry Committee. A complaint received by any of these persons is equally valid and shall be recorded and referred without delay. Where the Act permits an oral

or informal request, the recipient shall assist the complainant to document the matter without creating an unnecessary barrier to reporting.

Designated complaint email/address: complaints@bargad.org.pk

8.2 Harassment and Gender-Based Discrimination

A complaint concerning harassment or gender-based discrimination shall be handled under the Act and this policy by the Harassment Inquiry Committee. BARGAD's Gender Discrimination Policy may provide supplementary guidance, but it shall not replace or restrict the statutory mechanism.

8.3 Safeguarding, Conflict of Interest and Other Complaints

The Complaint Mechanism Committee may receive and triage complaints under BARGAD's complaint mechanism. Safeguarding concerns shall be referred to the designated Safeguarding Committee or other body authorized under the Safeguarding Policy. Conflict-of-interest and other matters shall be referred under the applicable policy and procedure. If a complaint contains both harassment and safeguarding or other elements, the statutory harassment inquiry shall proceed while the committees coordinate safeguards, avoid duplication and protect confidentiality.

8.4 Complaints Concerning Board Members or Senior Management

A harassment complaint against a Board member shall be referred to the Harassment Inquiry Committee. The Board's Membership Review Committee may separately consider governance or membership consequences after, or consistently with, the statutory process. A complaint against the Executive Director shall be referred to the Inquiry Committee and to the alternate Competent Authority designated under Section 11.4.

9. Informal Resolution

Where permitted by the Act and appropriate to the nature and seriousness of the conduct, a complainant may request informal resolution. Informal resolution is voluntary and shall not be imposed, used to discourage a formal complaint or used where it may expose a person to further harm. A complainant may proceed formally at any time. Serious allegations, threats, violence, coercion, repeated conduct or significant power imbalance should ordinarily be referred for formal inquiry.

10. Formal Inquiry Procedure

The Inquiry Committee shall comply with the Act and, within three days of receiving a written complaint, shall:

1. communicate to the accused the charges and statement of allegations and obtain formal written receipt;
2. require the accused to submit a written defence within seven days from the date the charge is communicated and, where the accused fails without reasonable cause, proceed ex parte; and
3. inquire into the charge and examine such oral, documentary, audio, video or other admissible evidence as it considers necessary. Each party shall be entitled to cross-examine witnesses against that party, subject to lawful and appropriate safeguards.

The Committee may regulate its procedure, fix the time and place of sittings and, where applicable, use child-sensitive procedures. It shall act impartially and provide both parties a fair opportunity to be heard.

During the inquiry:

- statements and evidence shall be treated as confidential;
- an appropriate officer may be nominated to advise and assist a party where necessary;
- each party may be represented or accompanied by a CBA representative, friend or colleague as permitted by law;
- no adverse action shall be taken against the complainant or witnesses;
- the employer and accused shall not create a hostile environment or pressure the complainant; and
- the Committee shall record its findings and reasons in writing.

11. Harassment Inquiry Committee

11.1 Composition and Appointment

The Committee shall comprise three members excluding the Executive Director: one representative of the Programme Department, one representative of the MEAL Department and one member of the Board of Directors. At least one member shall be a woman. Appointments shall collectively satisfy the requirements of the Act concerning senior management, employee representation and any permissible external co-option. The Executive Director shall propose the members and the Board of Directors shall approve the appointment and designate a Chairperson from among them.

BARGAD shall designate a Secretary to receive, register and securely maintain complaints and records. The Secretary need not be a voting member of the Committee.

11.2 Recusal and Replacement

A member who is the subject of a complaint, has an actual or perceived conflict of interest, has a close relationship with a party or witness, or cannot act impartially shall disclose the matter and recuse. The member shall be replaced for that case by a suitably qualified person from within or outside BARGAD, consistently with the Act.

11.3 Independence and Reporting

The Committee shall conduct inquiries independently and shall report its findings and recommendations only to the Competent Authority. No person, including the Executive Director or a Board member, may direct the Committee's findings in an individual case.

11.4 Competent Authority and Recusal

The Executive Director shall ordinarily serve as the Competent Authority. Where the Executive Director is the complainant, accused, a material witness, conflicted or otherwise unable to act, the Board shall designate an independent alternate Competent Authority who is not involved in the complaint or inquiry. Where a Board member is accused, the designated authority shall be free from any conflict, and the accused shall take no part in the appointment or decision.

12. Powers of the Harassment Inquiry Committee

For purposes of an inquiry, the Committee shall exercise the powers provided by the Act, including the power to summon and enforce attendance, require production of documentary, audio or video evidence, receive evidence on affidavits, examine witnesses and recommend appropriate action against a person who obstructs the inquiry or fails to comply, subject to applicable law.

13. Findings, Recommendations and Decision

The Committee shall submit written findings and recommendations, with reasons, to the Competent Authority within thirty days of initiation of the inquiry. If the accused is found guilty, the Committee may recommend one or more penalties available under the Act, as applicable.

13.1 Minor Penalties

- censure;
- withholding promotion or increment for a specified period;
- stoppage at an efficiency bar for a specified period, where applicable; and
- recovery from the accused's pay or another source of compensation payable to the complainant.

13.2 Major Penalties

- reduction to a lower post, time-scale or stage in a time-scale;
- compulsory retirement;
- removal from service;
- dismissal from service;
- suspension or cancellation of a professional licence, where applicable; and
- a fine, part of which may be used as compensation for the complainant.

The Competent Authority shall impose the recommended penalty within one week of receiving the Committee's recommendations, as required by the Act. Any departure shall only occur where law expressly permits and shall be reasoned and documented.

14. Protection, Interim Measures and Support

BARGAD may take proportionate interim measures to protect the parties and the integrity of the inquiry without prejudging the complaint. Measures may include reporting-line adjustments, separation of workspaces, remote work, schedule changes, leave, limits on contact, security arrangements or temporary reassignment. A complainant shall not be involuntarily transferred or disadvantaged merely for making a complaint unless required for immediate safety and agreed where practicable.

Where a complainant is experiencing trauma or other harm, BARGAD may arrange or facilitate psychosocial counselling, medical treatment and additional medical leave. Subject to law, policy and available resources, BARGAD may provide or facilitate compensation for loss of salary or other established damage.

15. Confidentiality, Records and Non-Retaliation

Information shall be shared only with persons who need it to receive, assess, investigate, decide, support, safeguard or comply with law. Records shall be secured by the designated Secretary with controlled access and retained according to BARGAD's records policy and legal requirements.

Retaliation, victimisation, pressure, intimidation, obstruction or interference is prohibited and may result in separate disciplinary action. Confidentiality does not prevent a person from obtaining legal, medical or psychosocial advice, exercising a statutory right, reporting a crime or complying with a lawful direction.

16. Malicious or Knowingly False Complaints

A complaint that is not substantiated is not, for that reason alone, false or malicious. Where the Committee determines, on evidence and after giving the complainant an opportunity to respond, that a complaint was knowingly false and made with malicious intent, it may recommend proportionate disciplinary action under the applicable framework. No action shall be taken merely because evidence was insufficient, accounts differed or a complaint was withdrawn.

17. Appeal and Ombudsperson

Any party aggrieved by a decision or penalty may exercise the statutory right of appeal to the competent Ombudsperson within thirty days of written communication of the decision, in accordance with the Act. The Ombudsperson shall process the case or appeal under the applicable statutory procedure. Nothing in this policy prevents a complainant from filing a complaint directly with the Ombudsperson where permitted by the Act.

BARGAD shall provide reasonable information about the applicable Ombudsperson and shall not obstruct or retaliate against a person for using an external legal remedy.

18. Committee Meetings and Monitoring

The Inquiry Committee shall meet whenever required for a complaint and shall complete proceedings within the statutory timelines. It shall also meet once every two months for administrative monitoring of implementation, awareness, reporting access and completion of approved recommendations. Routine meetings shall not disclose identifiable case information beyond what is necessary and lawful.

19. Awareness and Implementation

Human Resources shall communicate this policy and reporting channels at induction and periodically thereafter. BARGAD shall display the statutory Code of Conduct as required by law and provide appropriate orientation to Committee members, managers and personnel on prevention, reporting, confidentiality, non-retaliation and trauma-informed handling.

20. Related Documents

- Code of Conduct
- Gender Discrimination Policy
- Safeguarding Children and Vulnerable Adults Policy
- Diversity Policy
- Preventing Sexual Exploitation and Abuse Policy

- Complaint Mechanism Policy
- Conflict of Interest provisions and procedures
- HR Policy and applicable disciplinary procedures

21. Policy Review and Approval

This policy shall be reviewed at least every three years, or earlier following a legal amendment, material case-learning, organizational change or Board direction. Amendments require approval by the Board of Directors. Human Resources may issue non-substantive forms and operating guidance consistent with this policy.

Annex A — Harassment Inquiry Committee Terms of Reference

A1. Mandate and Purpose

The Harassment Inquiry Committee is BARGAD's statutory committee for receiving referrals, conducting fair and confidential inquiries into workplace-harassment complaints, recording findings and reasons, and making recommendations to the Competent Authority under the Act and this policy. The Committee recommends disciplinary outcomes; the Competent Authority imposes the penalty in accordance with law.

A2. Composition

- Three members, excluding the Executive Director.
- One representative from the Programme Department.
- One representative from the MEAL Department.
- One member of the Board of Directors.
- At least one member shall be a woman.
- The composition and any co-option or replacement shall comply with the Act.

The Executive Director proposes appointments and the Board approves them. The Board shall designate a Chairperson. A Secretary shall be designated to receive and record complaints and provide secure administrative support.

A3. Term

Members shall be appointed for two years and may serve no more than two consecutive terms. If a term expires during an inquiry, the member may continue solely for that inquiry until a final decision is made, unless recusal or replacement is necessary. The Board may authorize a limited extension required to complete an ongoing inquiry.

A4. Quorum

The quorum is all three members. Where a member cannot participate or must recuse, a replacement shall be appointed before substantive proceedings continue.

A5. Authority

The Committee may regulate its proceedings and exercise the inquiry powers provided by the Act. It may request records and administrative assistance, schedule hearings, examine evidence and witnesses, apply appropriate safeguards, and make findings and recommendations. It may not finally impose a statutory penalty unless the law expressly assigns that function to it.

A6. Independence and Reporting

The Committee is independent in conducting an inquiry and reports its findings and recommendations only to the Competent Authority. Where the Executive Director cannot act, reporting shall be to the duly designated alternate Competent Authority.

A7. Meetings

Inquiry hearings shall be scheduled according to the nature and urgency of the complaint and the statutory timelines. The Committee shall also meet once every two months for non-case-specific implementation monitoring.

A8. Confidentiality and Conflicts

Members and support personnel shall sign or observe applicable confidentiality obligations. Members must promptly disclose conflicts of interest and recuse where impartiality could reasonably be questioned. Case records shall not be used or disclosed for an unrelated purpose.

A9. Staff Support

All BARGAD personnel shall provide reasonable administrative, logistical, security, IT, records or other support requested by the Committee, subject to confidentiality and need-to-know controls.

A10. Deliverables

- a secure complaint and action record maintained by the Secretary;
- a documented inquiry plan and hearing record, as appropriate;
- written findings with reasons and recommendations within the statutory period; and
- administrative monitoring notes that exclude unnecessary personal or case-identifying information.

Annex B — Complaint Routing Guide

Nature of concern	Primary route	Important qualification
Harassment or gender-based discrimination	Harassment Inquiry Committee	Statutory procedure applies; direct recourse to the Ombudsperson remains available where permitted.
Complaint concerning a Board member	Relevant committee according to subject matter	Harassment goes to the Inquiry Committee; Membership Review may address separate governance consequences.

Nature of concern	Primary route	Important qualification
Complaint concerning the ED	Relevant committee plus alternate Competent Authority	The ED must not convene, supervise or decide their own case.

Approved by the Board of Directors on: _____