

# UNIVERSITY OF CARTHAGE

## Anti-Discrimination & Anti-Harassment Policy

*Governance Policy | August 2025*

*Approved by University Administration | August 2025*

### 1. Preamble & Relationship to the EDI Plan

The University of Carthage is unequivocally committed to providing an environment — for every student, researcher, member of staff, visitor, and partner — that is free from discrimination, harassment, bullying, and victimization in any form. This commitment is not merely a legal obligation: it is a foundational expression of our institutional values and our mission as a public university dedicated to knowledge, human development, and social progress.

This Anti-Discrimination and Anti-Harassment Policy is a companion document to, and an operational instrument of, the University of Carthage's Equality, Diversity and Inclusion (EDI) Plan 2024–2027. Where the EDI Plan establishes the University's overarching strategic commitments and governance framework for equality across all nine protected characteristics, this Policy provides the specific definitions, prohibited conduct standards, reporting procedures, and enforcement mechanisms that give those commitments legal and procedural effect.

Both documents are to be read together and must be interpreted consistently. In the event of any conflict between this Policy and the EDI Plan, the more protective provision shall apply.

### 2. Scope

This Policy applies to all members of the University of Carthage community without exception, including:

- Academic staff (full-time, part-time, visiting, and adjunct).
- Administrative, technical, and support staff.
- Students at all levels (undergraduate, postgraduate, doctoral, and continuing education).
- Contractors, consultants, and suppliers operating on university premises or on behalf of the University.
- Visitors, partners, and any other individuals participating in university activities.

This Policy applies to all University activities and settings, including on-campus environments, off-campus events and field trips, digital and online platforms, social media, and any context in which an individual is acting in a university capacity or where conduct has a direct bearing on the University community.

### 3. Protected Characteristics

In alignment with the University's EDI Plan 2024–2027, this Policy affords protection to individuals across the following nine recognized protected characteristics:

#	Protected Characteristic	Scope of Protection
1	Age	Protection from discrimination based on age, whether young or old, in access to education, employment, or university services.
2	Disability	Protection for individuals with physical, sensory, cognitive, mental health, or other long-term conditions affecting daily activities.
3	Race, Ethnicity & Cultural Background	Protection from discrimination based on race, color, nationality, ethnic or national origin.
4	Religion or Belief	Protection for any religion, religious or philosophical belief, or absence of belief.
5	Gender & Gender Identity	Protection from discrimination based on sex, gender identity, or gender expression, including for transgender and non-binary individuals.
6	Pregnancy & Maternity	Protection from disadvantage arising from pregnancy, childbirth, or maternity and paternity leave.
7	Socio-economic Background	Protection against disadvantage arising from socio-economic status or background in access to education, opportunity, and university life.
8	Sexual Orientation	Protection from discrimination based on actual or perceived sexual orientation.
9	Other Vulnerable Situations	Including but not limited to international students, first-generation university students, and individuals in precarious employment or financial situations.

### 4. Definitions of Prohibited Conduct

The University of Carthage adopts a zero-tolerance approach to the following forms of prohibited conduct. These definitions apply regardless of intent: it is the impact of the behavior on the recipient that is determinative, not the intention of the person responsible.

<b>A</b>	<p><b>Direct Discrimination</b></p> <p><i>Treating a person less favorably than another person in a comparable situation because of a protected characteristic.</i></p> <ul style="list-style-type: none"> <li>Refusing to admit a student or appoint a candidate on grounds of their age, disability, ethnic background, or religion.</li> </ul>
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- Denying a staff member a promotion or professional development opportunity because of their gender or pregnancy.
- Applying different academic standards or assessment criteria to students on the basis of a protected characteristic.

### **Indirect Discrimination**

*Applying a provision, criterion, or practice that appears neutral on its face but which places persons sharing a protected characteristic at a particular disadvantage, without objective justification.*

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- Scheduling all key meetings or examinations exclusively at times that systematically disadvantage staff or students observing religious obligations.
- Requiring qualifications obtainable only through routes inaccessible to persons with certain disabilities, without justification.
- Imposing administrative conditions that disproportionately burden students from lower socio-economic backgrounds.

### **Harassment**

*Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating, or offensive environment.*

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- Derogatory remarks, jokes, or stereotyping comments directed at a person's ethnic background, religion, disability, or gender.
- Persistent unwanted contact, exclusion, or ostracism directed at a person because of a protected characteristic.
- Display of offensive materials, symbols, or imagery related to a protected characteristic.
- Online harassment, including through social media, messaging platforms, or University digital systems.

### **Sexual Harassment**

*Unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. This includes conduct directed at any person regardless of gender or sexual orientation.*

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- Unwanted physical contact of a sexual nature.
- Sending or displaying sexually explicit materials without consent.
- Making suggestive comments, sexual jokes, or propositions.
- Conditioning academic or professional outcomes on submission to sexual advances (quid pro quo harassment).
- Sexual misconduct between staff and students, recognizing the inherent power imbalance in such relationships.

## Bullying

*Persistent, offensive, abusive, intimidating, or insulting behavior, or the abuse of power, that makes the recipient feel threatened, humiliated, or vulnerable. Bullying need not be related to a protected characteristic but is prohibited in all forms.*

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- Persistent criticism, belittling, or undermining of a person's work or competence in public or private.
- Deliberate exclusion from meetings, communications, or decisions relevant to a person's role.
- Setting unachievable or constantly shifting deadlines or workloads as a form of pressure.
- Misuse of supervisory authority to intimidate or control doctoral candidates or junior staff.

## Victimization

*Subjecting a person to a detriment because they have made, supported, or are believed to have made a complaint of discrimination or harassment, or because they have participated in related proceedings.*

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- Penalizing a student academically because they reported a harassment incident involving a member of staff.
- Excluding a staff member from opportunities because they gave evidence in a discrimination investigation.
- Threatening or intimidating a person who has submitted a complaint or acted as a witness.

## 5. Specific Provisions

### 5.1 Staff–Student Relationships

The University recognizes the particular vulnerability created by power imbalances in staff–student relationships, including those between supervisors and doctoral candidates. Romantic relationships between a member of staff and a student for whom that staff member holds direct academic, supervisory, or pastoral responsibility are strongly discouraged and must be declared immediately to the relevant Head of Department or EDI Officer to allow appropriate measures to be taken. Any such relationship in which a staff member uses their position to coerce, pressure, or manipulate a student will be treated as a serious disciplinary matter.

### 5.2 Online & Digital Conduct

This Policy applies in full to all digital environments, including University email and communication systems, virtual learning environments, online conferences and events, and personal social media where conduct relates to, or affects, members of the University community. Cyberbullying, online harassment, and the non-consensual sharing of images or private communications are prohibited and will be treated with the same seriousness as equivalent in-person conduct.

### 5.3 Third-Party Conduct

The University will take all reasonable steps to protect its staff and students from discrimination or harassment by third parties, including contractors, suppliers, external speakers, or visitors. Where third-party conduct breaches this Policy, the University will take appropriate action, which may include terminating the relevant contract, engagement, or access to university premises.

### 5.4 Reasonable Adjustments for Disabled Individuals

Failure to make a reasonable adjustment for a disabled student or member of staff, where such an adjustment is practicable and would remove or reduce a substantial disadvantage, constitutes a form of discrimination under this Policy. The University's disability support service will work with individuals to identify and implement appropriate adjustments in a timely manner.

## 6. Reporting Mechanisms

The University of Carthage is committed to making reporting accessible, safe, and effective for all members of its community. The following reporting routes are available:

### 6.1 Informal Resolution

Where the complainant feels comfortable doing so and considers it appropriate, they may seek to resolve the matter informally by raising it directly with the person concerned, or with the support of a line manager, EDI representative, or a trusted colleague. Informal resolution will always be offered as an option but will never be imposed.

### 6.2 Formal Reporting Channels

- Direct report to a line manager, Head of Department, or Faculty EDI Representative.
- Report to the University's designated EDI Officer (as established under the EDI Plan 2024–2027).
- Report to the EDI Committee, which has responsibility for oversight of all nine protected characteristics.
- Anonymous online reporting tool (to be established on the University intranet, as committed to in the EDI Plan).
- Confidential one-to-one meeting with the EDI Officer, available to all staff and students.
- External escalation to an independent ombudsman or relevant national authority where an institutional conflict of interest arises.

### 6.3 Confidentiality & Support

All reports will be handled with strict confidentiality, sensitivity, and impartiality, and in full accordance with applicable Tunisian law. The identity of the complainant will be protected to the fullest extent possible throughout the process. Complainants and witnesses will be offered appropriate pastoral and psychological support throughout any investigation. The

University will ensure that making a report does not result in any adverse academic or professional consequence for the person reporting.

## 7. Investigation & Disciplinary Procedures

All formal reports of discrimination, harassment, bullying, or victimization will be subject to a prompt, impartial, and thorough investigation conducted in accordance with the University's disciplinary procedures. The Following Principles govern all investigations :

- Both the complainant and the respondent are entitled to be heard, to be accompanied by a person of their choice, and to be treated with dignity and fairness throughout the process.
- Investigations will be conducted by trained individuals who have no personal conflict of interest in relation to the matter.
- Investigations will be completed within a reasonable and defined timeframe, with regular updates provided to all parties.
- Findings and conclusions will be communicated to both parties in writing.

Where an investigation finds that prohibited conduct has occurred, disciplinary action will be taken proportionate to the severity of the conduct. Consequences may include:

- Formal written warning.
- Mandatory participation in EDI or behavioral training.
- Removal from supervisory or leadership roles.
- Suspension or termination of employment.
- Exclusion from the University (for students).
- Referral to competent judicial or prosecutorial authorities where criminal conduct is involved.

Retaliation against any person who makes a good-faith report, participates in an investigation, or supports a complainant is itself a disciplinary offence of the utmost seriousness and will be subject to formal proceedings.

## 8. Responsibilities

### 8.1 University Leadership

The President and senior leadership of the University are responsible for ensuring that this Policy is adequately resourced, actively communicated, and consistently enforced. They are also responsible for modelling exemplary behavior in all interactions and for creating a culture in which all members of the University community feel safe to raise concerns.

### 8.2 Managers & Supervisors

All persons in managerial, supervisory, or leadership roles, including Heads of Department, research supervisors, and program directors, have a specific duty to prevent and address discrimination and harassment within their area of responsibility. They must not ignore or minimize concerns raised with them, and must escalate matters appropriately and promptly.

### 8.3 All Staff & Students

Every member of the University community is expected to treat others with dignity, respect, and professionalism at all times. Staff and students who witness or become aware of prohibited conduct are encouraged to report it and to support colleagues or peers who are affected. Bystander intervention training will be made available as part of the University's broader EDI training program.

### 8.4 The EDI Committee

The EDI Committee, established under the EDI Plan 2024–2027 and chaired by the designated EDI Officer, has primary institutional responsibility for overseeing the implementation and effectiveness of this Policy. It will monitor trends in reported incidents, review the adequacy of procedures, and report annually to the University President. Founding members of the Committee include: Mongi Besbes, Syrine Douik, Marwa Zouari, Ibtihel Saidi, Tahar Jallouli, and Rania Bengriche, to be supplemented by additional members with relevant expertise or lived experience.

## 9. Training & Awareness

In alignment with the EDI Plan 2024–2027, the University will ensure that all staff and students receive appropriate training on the content and application of this Policy. Specifically:

- Mandatory induction training on anti-discrimination, anti-harassment, and inclusion principles for all new staff and students.
- Periodic refresher training for all staff, with dedicated modules for managers and supervisors on their specific responsibilities.
- Specialist training for EDI Officers, investigation panel members, and members of the EDI Committee.
- Bystander intervention training to empower all community members to respond appropriately when they witness prohibited conduct.
- Integration of EDI and anti-harassment content into relevant curricula and research training programs.

Training records will be maintained and reviewed annually by the EDI Committee as part of the University's overall monitoring framework.

## 10. Monitoring, Review & Reporting

This Policy will be reviewed annually by the EDI Committee, in conjunction with the annual review of the EDI Plan 2024–2027. The review will consider:

- The number, nature, and outcomes of complaints received during the reporting period.
- Trends and patterns that may indicate systemic issues requiring structural intervention.

- Feedback from staff, students, and other stakeholders on the effectiveness and accessibility of reporting mechanisms.
- Changes in applicable legislation, judicial decisions, and international best practice.

An anonymized summary of incidents reported, investigated, and resolved, disaggregated by protected characteristic where possible, will be included in the University's Annual EDI Report, which is published publicly in accordance with the commitments of the EDI Plan 2024–2027.

## 11. Legal & Regulatory Framework

This Policy is grounded in, and fully compliant with, the following legislative and regulatory instruments:

- Law No. 2008-19 of 25 February 2008 on Higher Education in Tunisia.
- Applicable provisions of the Tunisian Labor Code relating to workplace harassment and dignity at work.
- Tunisian Constitutional provisions on equality, non-discrimination, and human dignity.
- Law No. 2017-58 of 24 August 2017 on whistleblower protection.
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), to which Tunisia is a signatory.
- International Labor Organization (ILO) Convention No. 190 on Violence and Harassment in the World of Work.
- United Nations Sustainable Development Goals: SDG 4 (Quality Education), SDG 10 (Reduced Inequalities), and SDG 16 (Peace, Justice and Strong Institutions), in alignment with the University's EDI Plan 2024–2027.
- ISO 9001:2015 — Quality Management Systems: the University's certified QMS framework, within which this Policy is embedded as a governance and people management requirement.