



KNIGHTS
COLLEGE

Sexual Harassment

Policy



Document Overview

Title:	Sexual Harassment Policy		
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Version History

Version No.	Date	Description of Changes
V2	01/07/2025	Document amended due to company re-branding

Continuous Improvement

Policies, procedures and processes are meant to be 'living' documents that need to be followed, implemented and maintained. If the procedure does not reflect the current, correct work practice please contact us on

quality@knights.edu.mt

1. Sexual Harassment Policy

1.1 Scope and Applicability

KNIGHTS is committed to maintaining a safe, respectful, and inclusive environment for all members of its community. Sexual harassment in any form will not be tolerated, and appropriate measures will be taken to address and prevent such behaviour.

This policy applies to all members of the KNIGHTS community, including students, faculty, staff, contractors, and visitors, in all KNIGHTS-related activities and environments. It covers all interactions in person, online, or through third-party services linked to KNIGHTS operations. The policy applies across all organisational processes, including recruitment, learning, teaching, research, fieldwork, internships, off-site events, and social gatherings. It extends to digital environments such as learning management systems, social media platforms, and professional networking sites affiliated with KNIGHTS activities.

1.2 Purpose

The purpose of this policy is to ensure that all individuals at KNIGHTS are treated with dignity and respect in an environment free from sexual harassment. KNIGHTS is committed to fostering a culture of mutual respect and integrity by preventing and addressing all forms of sexual harassment through clear procedures, regular awareness and training programs, supportive services, and disciplinary actions where necessary. The policy aligns with relevant national and international legal frameworks, ensuring compliance with Maltese and EU equality legislation. Individuals affected by harassment will have access to support services.

1.3 Policy Statement (Guiding Principles)

KNIGHTS is committed to upholding the principles of equality, dignity, and respect for all individuals. The institution recognises its responsibility to maintain a safe and inclusive environment where harassment of any kind is not tolerated. This policy is actively supported and endorsed by KNIGHTS leadership, ensuring its principles are integrated into the institution's daily operations.

This policy is guided by Maltese legislation, including:

- Equality for Men and Women Act (Cap. 456) – promoting equality between men and women in employment and services.
- Legal Notice 181 of 2008: Access to Goods and Services (Equal Treatment) – ensuring equal treatment in accessing services.
- Employment and Industrial Relations Act (Cap. 452) – regulating employment conditions, including protection from harassment in the workplace.
- Article 251A of the Criminal Code – covering the prohibition of sexual harassment in all spheres.
- General Data Protection Regulation (GDPR) – safeguarding the confidentiality of personal data related to reported incidents.
- Relevant EU Directives on Gender Equality and Harassment – ensuring alignment with European legal standards.

2. Definitions

Sexual Harassment: Unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. This includes verbal, non-verbal, physical, or online actions. Examples include unwanted sexual comments, inappropriate gestures, sharing explicit material without consent, and unwelcome physical contact.

Consent: A clear, informed, and voluntary agreement to engage in a specific activity. Consent must be given actively and should not be implied, and must be without coercion, manipulation, or intimidation, and can be withdrawn at any time.

Complainant: The person making a complaint about experiencing or witnessing sexual harassment.

Victimisation: Retaliatory action taken against someone who has made, supported, or participated in a complaint or investigation regarding sexual harassment. Examples include unfair treatment, exclusion from activities, or termination of employment.

Bystander Intervention: The responsibility of witnesses to intervene safely and report incidents of harassment when appropriate.

Respondent: The person against whom a complaint of sexual harassment has been made.

Third-Party Harassment: Harassment occurring through an external individual who is not a direct member of the KNIGHTS community but interacts with the institution, such as clients, contractors, or service providers.

3. KNIGHTS Commitment

KNIGHTS upholds a zero-tolerance policy toward sexual harassment, ensuring a learning and working environment where all individuals are treated with dignity and respect.

KNIGHTS is committed to:

- **Creating a Safe and Respectful Environment:** Promoting a culture of inclusion through policies, procedures, and positive behaviour models.
- **Responding Promptly and Effectively:** Investigating all complaints fairly and impartially within defined timelines, ensuring transparency throughout the process.
- **Providing Support Services:** Offering access to confidential counselling, wellbeing services, and academic or professional adjustments where needed.
- **Taking Disciplinary Action:** Applying appropriate sanctions, including warnings, suspension, or dismissal, depending on the severity of the misconduct.
- **Raising Awareness and Training:** Conducting workshops, training sessions, and awareness campaigns on sexual harassment prevention.
- **Monitoring and Compliance:** Periodically reviewing and updating the policy to align with legal developments and best practices.

4. Interpretation and Guidance

Given the complexity of interpreting certain behaviours, training sessions on acceptable workplace conduct and professional boundaries will be provided. The policy recognises that cultural norms and individual sensitivities vary; therefore, the guiding principle will be mutual respect and a willingness to address concerns promptly.

Sexual harassment includes, but is not limited to, the following behaviours:

Verbal Conduct:

- Offensive comments, inappropriate jokes, or suggestive remarks.
- Persistent unwelcome compliments or comments about appearance.
- Invitations to engage in any form of inappropriate or sexual behaviour.
- Coercive requests for sexual favours in exchange for academic or employment benefits.

Non-verbal Conduct:

- Displaying sexually explicit or suggestive images, posters, or digital content.
- Making sexually suggestive gestures, leering, or whistling.
- Sending unwanted gifts or notes of a sexual nature.

Physical Conduct:

- Unwanted physical contact, including touching, hugging, patting, or groping.
- Physical intimidation or blocking someone's path to coerce interaction.

Online Misconduct:

- Sending unsolicited explicit messages, emails, or images.
- Sharing private or intimate information or images without consent.
- Engaging in cyberstalking or using digital platforms to harass individuals.

Important Context:

- Sexual harassment can occur in various environments, including classrooms, offices, events, conferences, and online platforms linked to KNIGHTS activities. It may involve isolated incidents of serious misconduct or repeated unwelcome behaviour that creates a hostile environment. A person who was not the 'intended' victim of such harassment may also be considered as a victim to the same.

5. Reporting and Complaints Procedure

5.1 Dealing with sexual harassment informally

If the victim wishes to, she/he may opt to take informal action by approaching the person concerned and attempting to resolve issues informally.

This is done, primarily, by making it clear to the harasser that the behaviour is not welcome and unacceptable, and that it must stop.

It remains within the rights of the victim of sexual harassment to seek redress through the formal procedures outlined in this policy. Choosing not to use the informal procedure will not reflect negatively on a complainant throughout the formal procedure.

5.2 Filing a Complaint

5.2.1 Reporting for Students:

Students experiencing or witnessing sexual harassment are encouraged to report incidents promptly and directly to the School Principal or to the Head of Institution confidentially via email on kristina@knights.edu.mt (School Principal) or morgan@knights.edu.mt (Head of Institution) or by calling 2247 0000 to request a meeting.

5.2.2 Reporting for Staff and Faculty:

Incidents involving staff, including faculty members, must be reported to the Chairperson of the KNIGHTS Board by sending an email to morgan@knights.edu.mt. If the Chairperson is implicated, the report must be directed to the Chairperson of the Holding Board via email on steve@mdinapartners.com. If no female representatives are available on the Holding Board, an external investigator will be appointed.

5.2.3 Required Information for Filing a Complaint:

- Name of the complainant.
- Detailed description of the incident(s), including dates, times, locations, and individuals involved.
- Supporting evidence such as emails, messages, or witness accounts (including names and details of the witnesses), if available.
- Any action (such as informal action) already taken to prevent the harassment from occurring or continuing to occur.

5.2.4 Required Information for Filing a Complaint:

As a general principle, the decision whether to progress a complaint are up to the potential complainant. However, KNIGHTS has a duty to protect all members of its community, and may pursue the matter independently if, in the circumstances, it is consider appropriate to do so.

5.2.5 Confidentiality Statement:

All reports will be treated with the highest level of confidentiality. Information will only be shared on a need-to-know basis to facilitate investigation and resolution. No individual will face retaliation for filing a complaint or assisting in an investigation.

5.3 Investigation Process:

KNIGHTS is committed to conducting fair, impartial, and timely investigations into all sexual harassment complaints.

The investigation process includes the following steps:

1. Acknowledgement of Complaint:

- Complaints will be acknowledged no later than three (3) working days of receipt.

2. Appointment of Investigators:

- Two investigators of different genders in senior positions within KNIGHTS such as the Head of Institution, School Principal or Board Members will be appointed within five (5) working days to investigate the complaint.
- The investigators will ensure confidentiality and avoid conflicts of interest.
- A detailed investigation will be conducted, with findings concluded and compiled within a report.

3. Investigation Steps:

- Conducting interviews with the complainant, respondent, and any witnesses.
- Reviewing relevant documents, messages, or other supporting materials.
- Keeping detailed records of interviews, findings, and conclusions.

4. Interim Measures (if applicable):

Temporary measures such as separating the complainant and respondent, implementing remote work/study arrangements, or granting a temporary leave of absence. Where the complaint is against an employee, KNIGHTS may also consider suspending them on full pay if circumstances require.

5. Investigation Conclusion:

A final report will be completed within four (4) weeks of the initial complaint, unless an extension is warranted due to complexity or external factors.

6. Transparency and Communication:

Both parties will be informed in writing of the investigation outcome together with a summary of the compiled report, together with any recommended actions, while respecting confidentiality obligations.

7. Fair and Impartial Process:



All investigations will be conducted without bias, and all parties involved will be treated respectfully and fairly throughout the process.

- Reviewing relevant documents, messages, or other supporting materials.
- Keeping detailed records of interviews, findings, and conclusions.

8. Interim Measures (if applicable):

Temporary measures such as separating the complainant and respondent, implementing remote work/study arrangements, or granting a temporary leave of absence. Where the complaint is against an employee, KNIGHTS may also consider suspending them on full pay if circumstances require.

9. Investigation Conclusion:

A final report will be completed within four (4) weeks of the initial complaint, unless an extension is warranted due to complexity or external factors.

10. Transparency and Communication:

Both parties will be informed in writing of the investigation outcome together with a summary of the compiled report, together with any recommended actions, while respecting confidentiality obligations.

11. Fair and Impartial Process:

All investigations will be conducted without bias, and all parties involved will be treated respectfully and fairly throughout the process.

5.4 Resolution and Disciplinary Action:

If a complaint is substantiated following an investigation, KNIGHTS may take appropriate disciplinary and corrective action based on the severity of the incident, in line with internal policies.

Where the harasser is a third party, appropriate action might include putting up signs setting out acceptable and unacceptable behaviour; speaking or writing to the person and/or their superior about their behaviour; or, in very serious cases, banning them from the premises or terminating a contract or other agreement with them.

Possible Disciplinary Actions Include:

- Informal Resolution: Mediation, conflict resolution meetings, or corrective coaching.
- Formal Warnings: Written reprimands placed in the respondent's personnel or student file.
- Suspension: Temporary removal from work, classes, or campus activities.
- Expulsion or Termination: Permanent removal from KNIGHTS, applicable to both students and staff.
- Legal Action: Referral to relevant legal authorities where criminal conduct is suspected.

Appeals Process:

Applicable for students and staff

- Either party may appeal the decision within 7 working days of being notified of the investigation's outcome.
- Appeals must be submitted in writing to the Chairperson of the Holdings Board by sending an email to steve@mdinapartners.com, stating the reasons for contesting the decision or penalty.
- A final decision will be issued within 10 working days from receipt of the appeal. The period may however be extended due to compelling reasons related to the proper review of the matter.
- All investigation findings, decisions, and resolutions will be recorded securely and retained for a minimum of five (5) years, or longer if required by law.

5.5 Confidentiality and Non-Retaliation

KNIGHTS is committed to ensuring that all sexual harassment complaints are handled with the utmost confidentiality. The institution will take every reasonable measure to protect the identity of all parties involved, including the complainant, respondent, and witnesses, throughout the investigation and resolution process.

Confidentiality Measures:

- Access to complaint records will be strictly limited to authorised individuals directly involved in the investigation process.
- All written reports, evidence, and investigation outcomes will be securely stored in a restricted-access digital system.
- Information will be shared only on a need-to-know basis to ensure fair investigation and resolution.

Non-Retaliation:

KNIGHTS strictly prohibits retaliation against anyone who files a complaint, participates in an investigation, or supports a complainant. Examples of retaliation include but are not limited to:

- Demotion, dismissal, or academic penalties.
- Exclusion from work, study, or campus activities.
- Social exclusion, harassment, or intimidation by peers or supervisors.

However, filing groundless or malicious complaints constitutes an abuse of this Policy and will be treated as a violation. Any person who is found to have violated this aspect of the Policy will be subject to disciplinary action or such other action as may be applicable.

Consequences for Retaliation:

Any proven instance of retaliation will be treated as a serious policy violation and subject to disciplinary action, including formal warnings, suspension, expulsion, or employment termination.

Exceptions to Confidentiality:

While KNIGHTS is committed to maintaining confidentiality, exceptions may apply in the following cases:

- Legal Obligations: Where disclosure is required by law or court order.
- Imminent Threats: If there is reason to believe that a person's safety is at serious risk.

6. Monitoring and Policy Review

This policy will be reviewed every two years or sooner if legislative changes occur. Updates will be communicated through official KNIGHTS channels.

7. Associated Policies

- Equality and Inclusivity Policy
- Grievances and Appeals Policy
- Code of Conduct for Students and Staff
- Staff Evaluation, Promotion and Professional Development Policy
- Student Rights, responsibilities and Code of Conduct