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PREVENTION OF SEXUAL HARASSMENT  
POLICY & PROCEDURE

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GUYANA FOOTBALL FEDERATION



JUNE 20, 2019

# Prevention of Sexual Harassment Sport Policy

## Part 1 – Policy

### Policy Statement

The Guyana Football Federation is committed to providing a harassment-free environment where all persons involved in Football are treated with respect and dignity as all athletes, coaches and officials can contribute and participate fully. The Guyana Football Federation endeavors to apply best practices to prevent harassment by:

- Ensuring that this policy is shared with all employees, coaches, officials and persons involved in Football
- Ensuring prompt, appropriate and fair actions are taken for any complaints received
- Appointing a special committee of no less than three (3) trained members to provide information and advice/guidance on Prevention of Sexual Harassment
- Reviewing regularly our policy, procedure and practices as it related to Prevention of Sexual Harassment Policy

### Who the Policy and Procedure Cover

The Policy covers all:

- Register Members
- Affiliates
- Clubs
- Administrators and Officials
- Coaches
- Anyone employed by or represents the Guyana Football Federation, whether paid or unpaid

## **What the Policy and Procedures Cover**

The Policy and Procedures shall cover all situations connected with Guyana Football Federation including:

- Coaching
- Training /Practice
- Competition
- Travel
- Social events
- Meetings

## **Definitions**

Sexual harassment is the behaviour towards an individual or group that includes sexualised verbal, non-verbal or physical behaviour, whether intended or unintended, legal or illegal. This includes heterosexual or homosexual behaviour which can be reasonably perceived as placing a condition of a sexual nature on any aspect of the individual's participation or contribution.

## **Responsibilities**

The Guyana Football Federation shall be responsible for taking all reasonable steps to prevent sexual harassment within the organization and guarantees that the policy and procedures are known by all affiliated parties.

Guyana Football Federation will implement a mandatory section on the Prevention of Sexual Harassment Policy as part of all training sessions which will ensure that all parties are aware of:

- What sexual harassment
- Sexual Harassment will not be tolerated
- All complaints will be dealt with using established procedures involving both formal and informal mechanisms

## Part 11 - Procedure

### What is Harassment?

Football is a fun and healthy game which can help to grow more fulfilled individuals. This sport can also contribute to building stronger communities and ultimately our national pride. Everyone involved in the sport of Football regardless of role, has the right to participate in a positive manner and to maintain their dignity through fair treatment void of disrespect. Harassment in any sport denies people that right, therefore, physical or verbal abuse, sexual harassment, sexual abuse and exploitation are not allowed.

Harassment as defined in sports is any form of unwanted behaviour, it usually involves one person trying to exert power over another. Harassment ranges from mild conduct such as gestures or comments to conduct which may be physical, forceful and violent. It can start with taunts based on dress, body and escalate to violence or physical assault. If left unimpeded, harassment can create hostile environments for sport causing humiliation, embarrassment, reduced sports performance and ultimate withdrawal from the sport. Additionally, as a result of unchecked harassment reputational damage for the individuals, teams and sports organization can ensue.

Harassment is not:

- Appropriate compliments
- Behaviour based on mutual attraction
- Friendly banter which is mutually acceptable

## What is Sexual Harassment?

Sexual Harassment is any unwelcome behaviour of a sexual nature and can include:

- Threats of harm to ensure co-operate in sexual activity
- Making promises for co-operation in sexual activity
- Punishing for non- co-operation in sexual activity
- Sexual behaviours that interfere with an athlete's performance
- Sexual behaviours that can create or promote an intimidating, hostile or offensive environment
- Repeated behaviours of a significant nature that has a detrimental effect

## Ways to deal with Sexual Harassment

If a member is being sexually harassed, two specific options are available for corrective action to be taken – Formal & Informal. There are vary in degrees of formality both formal and informal approaches. The options are:

### Self Help / Confrontation

This requires advising the offender that the harassing behaviour is unacceptable and must stop immediately; this option can bring a low-key & swift resolution to the matter.

### Recommended way:

- Identify a private area to address the person
- Advise in clear terms what behaviour is not acceptable and ask them to stop
- Advise in writing via a "Private & Confidential" letter to the person identifying the specific behaviour and ask them to stop

## **Informal**

This informal resolution of a sexual harassment situation requires the assistance of a third party; usually the Officers that can assist are:

- Club member
- Administrator /Official
- Councilor
- Any member of the association
- The Sexual Harassment Contact Person

## **Recommended Way:**

- Identify a private area to speak with the complainant of the incident and the solution required
- Speak with the alleged offender about specific incident in the presence of the complainant
- If there is agreement on the specifics of the incident and the proposed solution, the issue can be resolved confidentially immediately with all parties involved.

## **Formal**

A written formal complaint to the Sexual Harassment Contact Person - Guyana Football Federation outlining;

- Who the complaint is about - Name/Designation
- What happened (including time, date, place, what was said and/or done, how often this had been said and/or done)
- How it was responded to by the complainant/ alleged offender
- The impact the behaviour on the complainant
- Provide witnesses to the behaviour (if available)

- Desired outcome of the complaint
- Reason(s) for a delay in lodging the complaint if a significant time lapse (more than 8 months) since the incident occurred
- A Request for confidentiality/approval before any action is taken by the Guyana Football Federation

### **Sexual Harassment Complaint Procedure**

As part of its responsibility to deal with Sexual Harassment, the Guyana Football Federation will implement an effective and accessible complaint procedure.

The benefits to be derived includes:

- Conveyance of the importance placed by the Guyana Football Federation for prevention of sexual harassment
- The prevention of escalation of a case
- Ensure that complaints are dealt with consistently
- Alert the Guyana Football Federation to the presence of patterns of unacceptable conduct
- Provide opportunities to implement prevention strategies in the particular areas

## Implementing the Policy and Procedures

The recommended system for dealing with sexual harassment complaints should contain the following basic elements:

- Clearly documented guidelines that is accessible to all members
- Formal and informal options for handling sexual harassment complaints
- A guarantee that complaints will be handled with confidentiality, promptness and tact
- Trained personnel
- Record-keeping procedures
- An appeals mechanism
- Consistency with existing procedures
- Access to disciplinary measures when necessary

**Key individuals must be identified for training to fulfill key roles in implementing the policy.**

The process and the roles are as follows:

### **Sexual Harassment Contact Person**

The Harassment Contact People appointment should be done within six months the policy adoption and this position should be always filled.

### **Role of Sexual Harassment Contact Person**

- Provide information and advice on the issue of the Prevention of Sexual Harassment Policy
- Provide support for persons with complaints of sexual harassment during the investigation



- Provide assistance to persons in informal resolution of sexual harassment complaint.

*NB: The Sexual Harassment Contact Person will not be responsible for investigating or receiving formal complaints. The Guyana Football Federation will appoint a minimum of 4 persons to fulfill this mandate.*

### **Harassment Complaints Officers**

Guyana Football Federation shall train and appoint at least four senior members – 2 males & 2 females - as Sexual Harassment Complaints Officers to manage the policy.

The Sexual Harassment Contact Person appointment should be done within six months the policy adoption and this position should be always filled.

### **Role of the Sexual Harassment Complaints Officer**

- Receive formal complaints
- Ensure that complaints are promptly, fairly and appropriately investigated
- Assemble a disciplinary committee as is required
- Monitor the general occurrences of complaints and advise the President –Guyana Football Federation accordingly
- Investigate unanimously received complaints and submit a factual report to the President – Guyana Football Federation within 3 months of completion of investigation

## Appointment of an Investigator

Upon the receipt of complaint, the *Sexual Harassment Complaints Officer*, shall expeditiously meet with the complainant to discuss the details of the complaints and advise the complainant of the process of a formal investigation. Should the complainant choose not to proceed this can be done in the presence of a support person during the meeting. Determining of the most appropriate way of formally investigating the complaint will be done by the Sexual Harassment Complaint Officer.

Options available to choose from:

- Investigation to be done by the Sexual Harassment Complaints Officers
- Sourcing an external investigator
- Appointing a committee to investigate the complaint
- A combination of the above
- An investigator should be appointed as early as possible, but within 21 days of the complaint.

## The Investigation Process

The investigator(s) should individually interview:

- The complainant
- The respondent
- Witness

The complainant and the respondent are each entitled to have present a support person or advisor during this process. Complainant, respondent and witnesses must be advised of the obligation for confidentiality and the penalties of breaches.

The respondent will be re-interviewed upon the completion all other interviews; and be given the opportunity to respond to the information gathered and presented.

A factual report must be completed by the investigators using the principles of civil law “balance of probabilities of approach” and not criminal law of “beyond reasonable doubt” and submitted the President of the Guyana Football Federation within seven (7) days.

The report must contain the following:

- The source of the complaint
- Respondents response to the allegation(s)
- Summary of information gathered from witnesses
- Justification for a preferred evidence source - one over another
- The details of the investigation
- Recommendation(s) for resolving the complaint
- If necessary, recommendation(s) to the Guyana Football Federation for prevention of recurrence

## **Rights of the Respondent**

The respondent must be given the opportunity to:

- Understand that there is an unbiased investigation and both sides have the right to be heard and the respondent has the right to have the final say in response to the evidence presented
- Be given full details of the complaint – accuser & witnesses
- Respond to the complaint and provide details of their side for a timely response
- Have sufficient support to respond

## **Decision Making**

The Sexual Harassment Complaints Officer who received the complaint should convene a disciplinary committee within 21 days.

The Committee will:

- Receive and review the investigator's factual report
- Provide the complainant and respondent with the opportunity to respond to same
- Provide recommendation(s) for appropriate action
- Determine if and what disciplinary actions/remedies are necessary for complainant
- Determine if changes are required to the Guyana Football Federation Sexual Harassment Policy and procedures

The disciplinary committee shall comprise the following officers:

- The Sexual Harassment Complaints Officers who received the complaint
- Two independent mixed gender appointees appointed by the Guyana Football Federation

The Committee may ask the investigator to attend to answer any questions Committee members may have. If the complainant or the respondent chooses to respond to the findings they may bring their support people with them. If the Sexual Harassment Complaints Officer who received the complaint was directly involved in the investigation, the other Harassment Complaints Officer should take their place on the disciplinary committee.

### **Possible Disciplinary Sanctions**

These include:

- A verbal or written apology
- A letter of reprimand
- Referral to counseling
- Removal of certain privileges of membership
- A change in role or duties
- Exclusion from teams traveling overseas
- Temporary suspension from duties
- Expulsion from membership
- Termination of employment
- Any other measures that the disciplinary committee determines are appropriate
- A combination of any of the above.

*N.B. Authority to involve the above sanctions must already be available to the GFF by virtue of constitution.*

## **Record Keeping**

The Guyana Football Federation must keep a confidential record of all formal complaints. These record must include record of the investigation, the decision of the disciplinary committee and the action taken.