



COUNTY GOVERNMENT OF MAKUENI

SEXUAL HARASSMENT AT WORKPLACE POLICY

IMPLEMENTATION GUIDELINES

CONTACT INFORMATION

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SECTION ONE

1.1 Introduction

Safety in the workplace is a concern for all employees and employers worldwide. Policy makers and governments all work to ensure that both are safe from any imminent danger that could otherwise compromise the realization of the organization's objectives. Sexual violence and harassment in the work place has become critical and threatens to tear apart the organizational fabric in many countries today. Too often sexual harassment has been viewed as *'just a woman's issue'* however, men also fall victims of sexual harassment and violence.

Sexual harassment is a form of discrimination that occurs when unwelcome sexual advances or a wide range of verbal or physical sexual conduct unreasonably interferes with a person's job or creates an intimidating or offensive work atmosphere.

Men and women are likely to experience and perceive sexually harassing behaviors differently because of gender inequality and culturally prescribed expressions of sexuality. Both women and men suffer sexual violence and harassment but current statistics show that women are more disadvantaged than men and with more consequences respectively.

In many instances women are significantly less tolerant of harassment and are thus more likely to see these behaviors as coercive and harmful. They are more likely to perceive the harasser negatively. To men, their masculinity encourages them to perceive of themselves as predators or protectors rather than targets (victims) of such harassment behavior and in most cases will not report the incident.

The harassment syndrome in general is found in all age and sex groups but never the less, young women remain the most frequent targets. The Government of Makueni County has laid emphasis on the need to provide a harassment-free workplace and adoption of a clear policy on sexual harassment.

According to the current records in the Human Resource Department, the total number of County staff is 3465 out of whom 2074 are female. The staff audit conducted in 2015 revealed that out of the total number of staff 0.51% of County employees were PLWDs.

This policy will endeavor to create a working environment free from sexual harassment, where all members of staff and stakeholders are treated with dignity, courtesy and respect. As such, it is the policy of Makueni County Government that no officer, intern, attachee and volunteer may sexually harass another or any member of the public in line with the County vision of a prosperous value based county with high quality of life.

The government takes cognizance of the fact that harassment undermines the full and free participation of officers and stakeholders, thus negatively impacting on their performance on day to day interactions by creating an intimidating, hostile and offensive work environment. This policy affirms the county government's position of "zero-tolerance to harassment".

1.2 Definition of sexual harassment and all forms of harassment

Sexual harassment can be defined as any unwelcome sexual advance, request for sexual favor or other verbal, non-verbal, or physical conduct of a sexual nature which unreasonably interferes with work, alters or is made a condition of employment, or creates an intimidating, hostile, or offensive environment.

Sexual harassment includes: unsolicited requests for sexual favors, requests for sexual favors linked to career prospects, unwanted physical contact, visual displays of degrading sexual images, sexually suggestive conduct, or offensive remarks of a sexual nature. Sexual harassment may occur between persons of the opposite sexes or of the same sex. Unwelcome sexual behavior may be obvious, or it may be subtle and persistent. While typically involving a pattern of behavior, it can take the form of a single incident.

The most obvious form of sexual harassment in the workplace is a direct or implicit request for, or offer to provide sexual favors in exchange for favorable career treatment.

For purposes of this policy and its application, sexual harassment is defined in accordance with the Sexual Offenses Act, 2006 (Section 23) as follows;

Any person, who being in a position of authority, or holding a public office, who persistently makes any sexual advances or requests which he or she knows, or has reasonable grounds to know, are unwelcome, is guilty of the offence of sexual harassment.

In addition, section J.18 of the County Human Resource manual states that; Sexual harassment will not be tolerated. The County condemns sexual harassment as a direct and

unacceptable contravention of its core values. As such, all county government of Makueni employees are prohibited from harassing other employees or stakeholders, whether or not the incidents of harassment occur on employer premises and whether or not the incidents occur during working hours.

The County Government of Makueni recognizes that an aggregation of a series of incidents or acts that form a pattern of behavior may constitute sexual harassment, even when some or all of those acts, when considered in isolation may appear to be minor or trivial. In addition, acts of sexual harassment may occur between individuals of same or different status, and both men and women can be subject to sexual harassment.

The government further recognizes that sexual harassment can take the form of sexual coercion or sexual annoyance and can occur in various forms, including; verbal, non-verbal, visual, psychological or physical sexual harassment. In this policy sexual harassment includes and is not limited to:

- a) Sexual solicitation, advances or propositions;
- b) Demanding dates or hugs;
- c) Bragging about sexual prowess, deficiencies or sexual teasing;
- d) Invading personal space;
- e) Making unnecessary physical contact;
- f) Verbal sexual harassment, including the use of sex specific derogatory and body language, the repetition of suggestive comments or innuendoes, or gender-related comments to bully someone;
- g) Inappropriate comments about one's physical appearance, characteristics or mannerisms;
- h) Leering or inappropriate staring;
- i) Using communication and media platforms to show or send pornographic messages, sexual pictures, sexual explicit graffiti or other sexual images;
- j) the use of crude or obscene language or gestures, or the telling of risqué or obscene jokes;
- k) Spreading sexual rumours;
- l) Asking questions about sexual activities;
- m) Fiddling with one's clothing, including putting hands in one's pocket;
- n) Giving gifts that are sexually suggestive

- o) Reprisal or making threats to penalize or otherwise punish a person for refusing to comply with sexual advances
- p) invitations to social activities if they persist after the recipient has made clear that they are not welcome;

1.3 Forms of sexual harassment

Sexual harassment can take various forms. Broadly, there are five forms of sexual harassment:

- i. Physical harassment includes unwelcome touching in a sexual manner such as kissing, patting, pinching, glancing or staring full of lust;
- ii. Verbal harassment includes unwelcome comments about private life or body part or person's appearance, sexually suggestive jokes and comments;
- iii. Gestural harassment includes sexually suggestive body language and or gestures, repeated winks, gestures with fingers, and licking lips;
- iv. Written or graphic harassment includes display of pornographic materials, sexually explicit pictures, screen savers or posters, or harassment via emails and other modes of electronic communication and;
- v. Psychological/emotional harassment consists of persistent proposals and unwelcome requests unwanted invitations to go out on dates, insults, taunts or innuendo of a sexual nature.

1.3 What constitutes sexual harassment and what does not constitute sexual harassment

Staff members must have reasonable grounds before making a complaint of harassment. All situations which appear to meet the definition ultimately may not be found to be instances of harassment. There is a wide range of ambiguous behavior that might offend some people, but not others. The key is whether or not the action was unwelcome, particularly in light of whether the recipient asked the alleged harasser to stop it, where this is possible.

Sometimes people who make remarks or gestures are not aware of their effect on others. They may think that they are being flattering, and may not realize that they are hurting the person in any way.

Situations can be perceived as harassment because of differences in:

- i. Power: Often people with power or authority are not aware of the effect their behavior has on others, because they are used to saying things and not being challenged. They may not know that an employee is afraid to speak up.
- ii. Culture: A flattering comment in one culture may be very inappropriate in another culture. It may even be inappropriate for a man to take notice of a woman in any way.
- iii. Gender: Men and women may define harassment differently. Studies have shown that men tend to see only overt behaviors—crude jokes, outright propositions, etc.—as sexual harassment, while women include more subtle behaviors.

It is important to note that supervisors may make negative decisions (e.g., about performance or work assignments), which do not, in themselves, constitute harassment. Supervisors have a responsibility to give frank and constructive feedback, and to take appropriate corrective action. Such feedback and actions should not be used to demean staff or as retaliation.

1.4 Goal

To promote and uphold a safe and conducive working environment free from all forms of harassment for all staff and stakeholders.

1.5 Broad objective

To provide a preventive and responsive mechanism to all forms of harassment at the workplace.

1.6 Statement of the Problem

The government of Makueni County through the department of Gender, Youth, Sports and Social services in collaboration with the office of the Deputy Governor organized two capacity building forums for all female and male employees, interns, attachees and volunteers. The forums were held in July 2016 at ACK guest house in Malili Konza city. The broad objective of the forums was mainly to share challenges encountered in the workplace specifically sexual harassment and its impact on productivity and performance on both women and men.

During the said staff capacity building forums, it was reported that majority of female officers and particularly young female staff, interns, attachees and volunteers have silently suffered the battle of sexual harassment in favor of job opportunities and other benefits. The forums gave officers an opportunity to break silence on sexual gender based violence in the workplace.

In addition, the Governor convened a meeting in May 2017 at ATC Kwa-kathoka where issues of sexual harassment were raised. It is evident that there is a high prevalence of sexual harassment in the workplace. Several cases have also been reported to the Human Resource Directorate for intervention. It is noteworthy that the county government must strive to provide a workplace that is equally appealing for both women and men.

1.7 Legal basis

The Universal Declaration of Human rights which is the foundation of Human rights world-wide strictly prohibits any form of discrimination including on the grounds of sex or gender.

The International Labour Organization (ILO) also defines the scope of sexual harassment as any insult or inappropriate remark, joke, insinuation and comment on a person's dress, physique, age, family situation, amounts to sexual harassment; Further a condescending or paternalistic attitude with sexual implications undermining dignity; any unwelcome invitation or request, accompanied by threats; any lascivious look or other gesture associated with sexuality; and any unnecessary physical contact such as touching, caresses, pinching or assault also amount to sexual harassment.

Similarly, the **Convention on the Elimination of all Forms of Violence against Women (CEDAW)** takes note that equality in employment can be seriously impaired when women are subjected to gender-specific violence, such as sexual harassment in the workplace.

In the Regional Sphere, the **African Charter on Human and Peoples' Rights** reiterates the international principles by obligating all States Parties to take all appropriate measures to protect women, especially the girl-child from all forms of abuse, including sexual harassment, to provide for sanctions against the perpetrators avail access to counseling and rehabilitation services to women who suffer abuses and sexual harassment and to integrate gender sensitization and human rights education at all levels.

In our Kenyan Context, the Constitution 2010 under **Article 2(5)** provides for the inclusion of International law as part of the Kenyan law while **Article 27 (4)** strictly prohibits discrimination on any grounds including sex, pregnancy, and marital status, among others.

Under our statutory provisions, the **Sexual Offences Act** provides in **Section 23** that any person, in a position of authority, who makes any sexual advances or requests which he or she knows are unwelcome, is guilty of the offence of sexual harassment is liable to imprisonment for a term of not less than 3 years or to a fine of not less than Ksh100, 000 or both.

Section 6(2) of the **Employment Act** stipulates that an employer who employs twenty or more employees shall, after consulting with the employees or their representatives if any, issue a policy statement on sexual harassment.

It further expounds on this issue by providing that an employee is harassed if an employer, or a representative of that employer or a co-worker-requests an employee for sexual intercourse, sexual contact, or any other form of sexual activity in exchange for a promise of preferential treatment in employment; or threat about the present or future employment status of the employee. The employee is also harassed if the employer or colleague uses language of a sexual nature whether written or spoken, uses visual material of a sexual nature; or shows physical behaviour of a sexual nature, which is unwelcome, or offensive to that Employee.

Section J.18 of the County Human Resource manual states that; Sexual harassment will not be tolerated. The County condemns sexual harassment as a direct and unacceptable contravention of its core values. As such, all county government of Makueni officers are prohibited from harassing other officers or stakeholders, whether or not the incidents of harassment occur on employer premises and whether or not the incidents occur during working hours.

SECTION TWO

2.1 Implementation Strategies

The implementation of this policy shall be guided under the following implementation guidelines:

2.1.1 Formation of Gender committee

The Office of the Governor shall oversee the committee operations. The following will constitute the Gender committee:

- i. Chief Officer Gender-Patron
- ii. Director HR-Chairperson
- iii. Director Gender
- iv. Counselor
- v. Legal representative-Secretary
- vi. HR representative from County Assembly
- vii. HR representative from County Public Service Board
- viii. Director internship and volunteerism

Five out of the eight members constitutes a quorum.

2.1.2 Capacity building of Gender and county human resource advisory committee

There will a formal induction on their roles and responsibilities before assuming their mandate. Periodical training for the committee, managers and supervisors will be conducted. Benchmarking will relevant commissions, ministries/department will be done.

2.1.3 Sensitization and awareness creation for county staff

The sensitization will be done by the Gender Committee, Head of Departments and supervisors through media mix (county website, Social and electronic media), publications, workshop, mentorship programmes among other means.

2.1.4 Partnerships/collaboration with development partners & like-minded organizations

The Gender Committee will be responsible for:-

- i. Mapping the potential development partners

- ii. Proposal writing
- iii. Joint interventions
- iv. Referrals to relevant partners

2.1.5 Sensitization of top county leadership and other stakeholders on benefits of having a sexual harassment policy

2.1.6 Placement of suggestion boxes at strategic places

2.1.7 Establish a hotline for reporting

2.2.8 The County Public Service Board shall ensure new employees sign a commitment to zero tolerance to sexual harassment at workplace.

SECTION THREE

3.1 Policy implementation procedures

This section covers complaints handling procedures and channels of reporting. The aggrieved party may report sexual harassment either directly to the office of the County Secretary, any member of the gender committee, supervisor/manager or HoD's in confidence.

3.2 Complaint Handling Procedures

Section J.18 of the County Human Resource manual contemplates that hearings will be conducted fairly with both parties given equal opportunity to put their case forward. Complaints on sexual harassment will be handled confidentially and with sensitivity and due respect to both parties. Care will be taken to protect the careers and reputations of both parties.

Sexual harassment is a gross misconduct and where the offender is guilty, he/she will be liable to instant dismissal. However, the Gender Committee may recommend other disciplinary actions to be taken against the aggressor.

3.2.1 Informal Resolution Procedure

A complainant may choose to handle a sexual harassment case informally, where no written complaint will be required. The procedure shall remain strictly confidential and shall be carried out without prejudice.

The informal process is intended to provide a means for solving problems before parties become adversarial, through avenues which enable an officer experiencing harassment to communicate with the person who is offending him/her in an open, honest and non-threatening manner. It is hoped that through discussion or mediation, parties will understand each other's point of view, and the provocative behavior will cease. A complainant has a

right to choose to pursue the formal complaints procedure at any time prior to the conclusion of the matter.

Informal actions will include;

- a) The complainant may communicate concerns to the alleged perpetrator indicating that the behavior is unwelcome and should stop immediately. In this case, the office of the Director of Human Resources shall:
 - i. act as a neutral, independent, confidential source of advice on individual situations, rules, options, strategy;
 - ii. intervene directly to ensure due process, fair treatment, through diplomacy and informal agreements;
 - iii. If necessary refer the offended/or both to other sources of conflict resolution.
- b) The Office of the Director of Gender shall promote diversity & gender equality through policy formulation and direct assistance to staff.
- c) Parties concerned may enter into mediation which is defined as a voluntary, confidential structured process for disputing parties facilitated by a neutral mediator. Parties are the decision makers in this process.

Should the informal resolution process as prescribed above be successful in resolving the matter, no disciplinary action shall be taken against the alleged perpetrator. No formal record of the informal procedure shall be entered in any employee file. As such, no party shall provide evidence or introduce documents from the process of an informal procedure unless all parties involved in the informal procedure consent to that disclosure. A complain form will be kept in confidence in the office of the Director Human Resource.

3.2.2 Formal Resolution Procedure

If the matter is not suitable for mediation, or if one or both parties refuse mediation, the complainant can fill a formal complaint form.

Investigations will be pursued as a harassment complaint only when it appears that:

- a) the complaint relates to harassment as defined in this policy;
- b) the complaint appears to have substance and to have been made in good faith.

The complainant will be informed if the incident does not constitute harassment, and therefore will not be investigated. In such cases, they will be advised of the different avenues

that can be taken to resolve the situation (e.g. a confidential review of the situation by Human Resources to determine if there is something that might be interfering with objective and positive operations in the work unit).

3.2.2.1 Responsibilities

Under the formal resolution procedure, the following are responsible.

- a) The office of the county secretary shall:**
 - i. Advise officers on actions that may constitute misconduct.
 - ii. Conduct investigations of officers misconduct.
 - iii. Refer the matter to the respective committee for necessary action
- b) The Gender Committee shall:**
 - i. be constituted of a nonpartisan panel
 - ii. provide a hearing for grievances
 - iii. carry out any further necessary investigation
 - iv. take necessary course of action
 - v. recommend disciplinary action to the county human resource advisory committee
- c) County Human Resource Advisory Committee shall:**
 - i. review the recommendations from the Gender Committee
 - ii. institute appropriate disciplinary action or
 - iii. recommend appropriately

Members of these committees shall be required to declare conflict of interest and exempt themselves from participating in the deliberations. The committee shall hold quarterly meetings to review progress on the policy implementation. However, the committee can hold regular meetings which shall be dictated by the number of cases.

3.3 Sexual harassment reporting procedure

The complainant shall submit to any member of the Gender committee, or Head of Department or the Director of Human Resource or Office of the County Secretary a written statement of complaint that will include;

- a) The names of the parties involved,
- b) A detailed description of the behavior that forms the basis of complaint,
- c) A request to initiate a formal complaints procedure.

Any formal complaint must be filed within 6 months of the last alleged instance of the action or conduct. The Secretary to the Gender Committee will write to the perpetrator informing him/her of the accusation, who shall respond in writing within five working days. The Gender Committee shall conduct preliminary investigations about the complaint within 15 working days on receipt of the response from the accused.

A comprehensive investigation report detailing the statement of complaint, the alleged perpetrator's written response, facts gathered and opinions formed by the investigator shall be submitted to the relevant committee. The committee shall review the report and decide appropriate remedial and/or disciplinary actions, in accordance with applicable disciplinary processes as deemed appropriate.

All parties involved shall at all times protect the complainant and alleged perpetrator from further embarrassment in the course of reporting and investigations. In case of sexual harassment, where the complainant suffered a loss, such as demotion or denial of promotion, the victim shall be restored to their proper position and compensated for any monetary losses suffered out of the denial of employment related benefits which were rightfully due.

This policy does not affect the rights of a complainant to pursue the complaint under the Sexual Offense Act, 2006.

3.4 Additional Conflict Resolution Resources

- a) Human Resource staff: Advises staff on rights and obligations under Staff Rules and how complaints might be best resolved.
- b) Staff Association: Assist staff to raise their grievances.

- c) Staff support Services: Offers confidential counselling on personal problems; provides consultation services for managers on how to help staff who have personal problems. Referrals, psycho-social support, formation of county support groups.
- d) Gender Committee: Provides advocacy and counselling assistance to staff wishing to file an appeal.

3.5 Third Party Observers

There may be situations where a staff member/stakeholder observes or is aware of a situation where harassment has occurred. In such situations, it is highly desirable for the observer to contribute to stopping the harassment for several reasons. Helping a colleague in need is good practice. Also, the person who is harassing a colleague could, over time, also harass others, including the observer. The harassment may create an environment of hostility that interferes with the work of the larger group.

The observer may act in several ways. She or he might talk to the person who is being harassed and encourage the person to seek advice. If the observer actually witnesses the offensive behavior, she or he could tell the person responsible that the behavior made the observer uncomfortable.

The observer of harassment should inform a manager/supervisor. It would not however, be appropriate for the observer to directly lodge a formal complaint on behalf of a person who is subjected to harassment. In cases where the person who is being harassed does not wish to lodge a formal or informal complaint, the observer could seek advice from one of resources for conflict resolution without disclosing the names of the parties involved.

Witnessing an incident of harassment can be traumatic to the observer. Observers can talk informally with the conflict resolution resources without disclosing the names of the parties involved.

If the Third Party Observer is harassed by the actions and behaviours of the alleged perpetrators, he/she can lodge a formal complaint.

3.6 Follow-Up on Complaints

Once a complaint is resolved, HoDs and supervisors will monitor the situation closely to ensure that all parties to the complaint make the transition back to their assigned work as

smoothly and as quickly as possible. The HoDs and supervisors will also monitor their work environment closely to ensure that there is no potential for repeating the improper behavior.

3.7 Freedom from Retaliation

Retaliation is any unwelcome attempt to discriminate against an officer or deleteriously affect the terms and conditions of a staff member's employment or work environment which is motivated by the officer's having made a complaint of harassment. Adverse actions taken against a complainant that appear to stem from the registering of a complaint or from using the grievance procedures will be thoroughly investigated.

Retaliation or the threat of retaliation at any stage of the formal or informal complaints process is prohibited. As such, there shall be no retaliation against any person on account of a complaint or an expressed intention to complain or on account of evidence or assistance given with respect to a complaint or a proposed complaint under this policy. Retaliation in itself constitutes misconduct subject to disciplinary action.

3.8 False Allegation

Any officer who makes a false allegation or a bad faith complaint, against another to the effect that the accused is a perpetrator of sexual harassment, shall be liable to disciplinary action equal to that which could have been subject to the alleged perpetrator; consistent with article 38 of the Sexual Offenses Act, 2006.

3.9 Records Management

All documents created in the course of handling a sexual harassment case shall be treated as confidential and shall be retained by the Director, Human Resource in accordance with the County government's policy on confidential records, except when required by law to be released to third parties.

SECTION FOUR

4.1 Roles and Responsibilities

The following entities have specific roles and responsibilities to undertake towards the successful implementation of the policy.

4.1.2 Role of office of the Governor

- a) Support implementation of the policy
- b) Oversee the operations of the committees involved.

4.1.3 Role of the Employer

- a. Ensure compliance and conformity
- b. Take steps to ensure that no officer is subjected to sexual harassment
- c. Investigate or refer cases to relevant committee
- d. Will not disclose the name of a complainant or the circumstances related to the complaint to any person except where the disclosure is necessary for the purpose of investigating the complaint or taking disciplinary measures in relation thereto

- e. Take such disciplinary measures as the employer deems appropriate against any person under the employer's direction, who subjects an employee to sexual harassment
- f. All the dissatisfied parties can appeal to the employer or courts as appropriate.

4.1.4 Role of Legal Department

- a. Ensure that all decisions arrived at complies or are legal
- b. Advise aggrieved parties who choose to go to court on appropriate legal mechanism

4.1.5 Role of County Officers

- a) Familiarize with the contents of this policy and uphold the principles provided herein.
- b) Be respectful to colleagues and maintain the highest standards of conduct and confidentiality
- c) Maintain a harmonious work environment for other colleagues by demonstrating behavior which is free from any form of sexual harassment
- d) Refrain from all forms of retaliation
- e) To report any form of harassment.

4.1.6 Roles and responsibilities of HoDs and Supervisors

- a) Monitor the working environment to ensure that acceptable standards of conduct are observed at all times
- b) HoDs/Supervisors have a responsibility to set positive examples in their daily actions and communications with staff, they must make clear that harassment will not be tolerated.
- c) Promote the County Government's sexual harassment policy within their departments
- d) Treat all complaints or concerns of alleged or possible harassment seriously and take immediate action to report within the provided mechanism
- e) Take any appropriate action to prevent retaliation or prohibited conduct from recurring during and after any investigations or complaints.
- f) Make themselves available to officers who may wish to raise concerns in confidence, and shall deal with such concerns in an impartial and sensitive manner.
- g) HoDs/Supervisors shall endeavor to create an atmosphere in which staff feels free to express concerns about inappropriate behaviors and to use, without fear of reprisal, the existing institutional channels for conflict resolution.

- h) HoDs/Supervisors who knowingly allows/cover harassment will be held accountable and shall be subject to disciplinary action.

4.1.7 Roles of Director Human Resource

- a) Ensuring that both the complainant and the alleged perpetrator are aware of the seriousness of a sexual harassment complaint.
- b) Exploring formal resolution procedures of resolving sexual harassment complaints
- c) Notifying the police if criminal activities are alleged.
- d) Arranging for investigations of alleged harassment and the preparation of a written report.
- e) Submission of a comprehensive written report of the investigation to the Human Resource Advisory Committee.

4.1.8 Role of Gender committee

- a) provide a hearing for grievances
- b) carry out any further necessary investigation
- c) take necessary course of action
- d) Study and deliberate investigation reports/cases and recommend appropriately

4.1.9 Role of County Human Resource Advisory Committee

- a. review the recommendations from the Gender Committee
- b. institute appropriate disciplinary action or recommend appropriately.

SECTION FIVE

5.1 Policy Communication, Monitoring and Review

This policy shall be communicated to all stakeholders through Works Committees, Social Dialogue Meetings, Human Resource Newsletters, media mix (county website, Social and electronic media), publications, workshops, mentorship programmes, flyers, Staff Notice Board, and any other County communication strategies applicable.

The Gender Committee in collaboration with relevant departments shall produce booklets of this policy and distribute it to the employees. It shall be the obligation of all employees with management responsibilities to bring to the attention of all other employees working under them the contents of this policy. A summary of this policy shall be displayed in appropriate areas.

5.2 Monitoring

The implementation of the policy will be monitored on a continuous basis. Monitoring will be based on performance indicators on areas identified in the policy, whose implementation will be measured to assess performance by all players with responsibilities as outlined by this policy.

5.3 Review

The policy guidelines shall be reviewed every (3) three years and whenever need arises.