

## **CApIC-ACE SEXUAL HARASSMENT POLICY**

### **Policy Statement**

The CApIC-ACE is committed to providing a safe and healthy environment free from any form of harassment including sexual harassment for all its staff and students. The centre will operate a zero tolerance for any form of sexual harassment, treat all incidents seriously and promptly investigate all allegations. Anyone accused of sexually harassing another will face disciplinary action which may include outright dismissal.

### **Scope**

This policy applies to every person in the centre regardless of gender, level, function, status. Employees, researchers and everyone interacting with the centre are covered by this policy. The centre is committed to carrying out all provisions in this policy and monitoring its effectiveness. This policy will be revised and improved upon on a consistent basis.

All sexual harassment is prohibited whether it takes place within the premises or outside, including social events, training sessions or conferences sponsored by the centre.

### **Definition of sexual harassment**

According to the Equal Employment Opportunity Commission, sexual harassment entails an unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature. Sexual harassment is subjective and circumstantial thus there is no definitive, exhaustive list of inappropriate behaviours.

Examples of conduct or behaviour which constitute sexual harassment include but not limited to:

#### Physical conduct

- Unwelcome physical contact including patting, pinching, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- The use of job-related threats or rewards to solicit sexual favours
- Repeatedly standing too close or brushing up against a person

#### Verbal conduct

- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Sending sexually explicit messages (via phone or email)

#### Non-verbal conduct

- Repeatedly making sexually suggestive gestures
- Gazing or looking in a lascivious or unpleasant way
- Making or posting sexually demeaning or offensive pictures

### **Filing a complaint**

Anyone who believes he/she has been the target of sexual harassment is encouraged to inform the alleged harasser orally or in writing that the conduct is unwanted and unwelcome. However, the centre recognizes that sexual harassment may occur in unequal relationships (i.e. between a mentor and a mentee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser or does not wish to communicate directly with the harasser or if such communication has not been effective, he/she can report allegations to designated officials responsible for receiving complaints of sexual harassment or any senior colleague in the center.

When a designated person receives a complaint of sexual harassment, he/she will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome he/she wants
- ensure that the victim understands the centre's procedures for dealing with the complaint
- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the victim

The victim can either use the formal or informal mode of complaints.

### **Informal complaints method**

If the victim wants to address the issue informally, the designated personnel will:

- ❖ give the alleged harasser the chance to respond to the complaint
- ❖ create an opportunity for both parties to discuss and resolve the issue informally to the complainant satisfaction
- ❖ keep a record of all discussion and events that takes place
- ❖ follow up after the issue has been resolved to ensure the behavior has stopped
- ❖ ensure that response and action taken on the complaint is done speedily and within 7 days

### **Formal complaints**

If the victim wants to make a formal complaint or if the outcome of the informal complaint did not yield a satisfactory outcome for the victim, the formal complaints method should be used to resolve the matter.

The designated staff who initially received the complaint will refer the matter to a senior person to initiate a formal investigation. The senior staff may handle the situation by him/herself or refer it to a committee of three others (creation of a committee should be done bearing in mind gender-balance)

The investigator will:

- interview the victim and alleged harasser separately
- interview any other relevant third parties
- decide whether the incident happened or not
- produce a report with details of the investigations, findings and any recommendations
- if the harassment is confirmed, decide on the appropriate sanction for the alleged and remedy for the victim
- follow up to ensure implementation of the recommendations, the behavior has stopped and victim is satisfied with the outcome
- keep a record of all actions taken
- ensure all records are kept confidential
- ensure the process is carried out as soon as possible and in any even within 14 days of the complaints being made

### **Staff/Student Rights**

As part of the team, staff/students have the right to a workplace that is free of harassment and inappropriate conduct. They have the right to report inappropriate conduct they experienced, witnessed or were informed of without the fear of retaliation or dismissal. They also have the right to report this behavior in any form of their choosing.

They are entitled to a quick, comprehensive and confidential (as much as possible) investigation into the allegations. Also, before, during and after the investigation, they have the right to attend to their mental and/or physical health if relevant.

### **Sanctions and disciplinary measures**

Anyone found to have sexually harassed another person under the terms of this policy is liable to any of the following

- receive a verbal or written warning or an adverse performance evaluation (for infrequent or less serious allegations)
- receive suspension and perhaps penalties such as a fine (for periodic or more serious sexual harassment incidents)
- face dismissal (for frequent or extremely serious allegations)

The nature of the sanctions will depend on the gravity and extent of the harassment. Serious cases of physical violence will result in immediate dismissal of the harasser. The disciplinary process is only an outline and requires the center to determine the severity of the harassment. We reserve the right to deviate from the process indicated above, depending on the severity of the incident and other circumstances.

### **Implementation of this policy**

The center will ensure that this policy is widely circulated to all staff and students; will be included in the handbook. All students must be trained on the content of this policy as part of their induction into the center. It is the responsibility of the management to ensure that all staff and students are aware of the policy.

### **Monitoring and evaluation**

The center will not underestimate the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors and other management officials will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result, the center will evaluate the effectiveness of this policy and make any changes needed. Monitoring and evaluation can be done through different means, including questionnaires completed by employees, feedback from victims. This is important to review the effectiveness of the policy and the complaints procedure

Our designated personnel for filing complaints is Dr. O.F. Yakubu ([omolara.yakubu@covenantuniversity.edu.ng](mailto:omolara.yakubu@covenantuniversity.edu.ng); +2348060170006)