



SULE LAMIDO UNIVERSITY KAFIN HAUSA

DRAFT ANTI-SEXUAL HARASSMENT POLICY

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This policy was drafted by the Technical Working Group-SLUK With the support from Gender Mobile

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1. Introduction

Sexual harassment and sexual assault continue to be a cause for serious concern across the country and is capable of undermining a positive learning and working environment in the Nigerian tertiary Institutions. Such acts are prohibited by certain legislative instruments both at the national and international levels as violating the fundamental rights and dignity of human person. In some instances, sexual harassment occurs when students take part in sexually explicit acts as part of hazing activities within the campuses. Sexual harassment, if left unchecked in our tertiary Institutions, can cost decreased academic productivity and excellence, low morale, increased absenteeism and generally hampers the safety of the members of the University community.

Sule Lamido University, Kafin Hausa in collaboration with Gender Mobile through the Jigawa State Ministry for Higher Education, Science and Technology drafts this model policy as a step towards total commitment to the fight against sexual harassment and sexual assault.

2. The Policy Statement

Sule Lamido University Kafin Hausa is committed to providing a safe teaching and learning environment free from discrimination on any ground and from all forms of harassment, including sexual harassment against staff or students. The University will operate a zero-tolerance policy for any form of sexual harassment in its campus, treat all incidences with seriousness and promptly investigate all allegations of sexual harassment. Any person found guilty will be sanctioned accordingly. The University will take all cases of sexual harassment with all seriousness and with confidentiality.

The Policy sets out the expectations and the moral code of conduct for staff and students relating to sexual harassment. The policy applies to all employees of Sule Lamido University (Teaching, Non-Teaching, Contract, Sabbatical, Visiting and Part-Time Staff) and students (Under Graduate and Post Graduate). All stakeholders in the University have a duty to know, prevent and be acquainted with complaint and enforcement procedure relating to sexual harassment cases.

3. Objectives of the Policy

The objectives of the Policy are to:

- i. Promote the right to dignity and privacy of human person within the University community
- ii. Promote a working environment that recognize morality and respect of all stakeholders, free from any form of discrimination, violence, bullying, harassment, including gender-based violence;
- iii. Educate all members of the University community especially staff and students on the ills of sexual harassment and their role in facilitating a sexual harassment free environment;
- iv. Enlightening members of the University community on the methods of preventing, reporting and responding to incidences relating to sexual harassment and assault;
- v. Providing an appropriate process and procedure for dealing with sexual harassment incidences.

4. Scope of the Policy

The policy shall apply to all Students and Staff (academic, non academic, full-time, part-time, visiting, sabbatical, all kinds of adhoc staff or any other staff by whatever name called) of Sule Lamido University Kafin Hausa who work at or visit the University or who take part in the institution's programmes and activities at any location.

5. Guiding Principles

- i. Fair hearing and inclusion
- ii. Prompt attention and response
- iii. Confidentiality and privacy
- iv. Protection from retaliation
- v. Effective sanctions for policy violation
- vi. Respect for freedom of expression including academic freedom
- vii. Integrity of the academic system

6. Definition of Sexual Harassment

Sexual harassment is an unwelcome conduct or behavior of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a pre-condition for offer of employment or for rendering of services. It includes situations which create an environment which is hostile, intimidating or humiliating for a person. Sexual harassment can involve one or more incidents and actions constituting harassment which may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

6.1 Physical Conduct

- a) Deliberate, Unsolicited physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching.

- b) Physical violence, including sexual assault such as rape between any gender and other related offences.
- c) Physical conduct, advances or threat aimed at sexual exploitation or harassment.

6.2 Verbal Conduct

- a) Negative or provocative comments on a worker's appearance, age, private life, etc.
- b) Sexual comments, stories and jokes
- c) Spoken sexual advances
- d) Repeated and unwanted social invitations for dates aimed at physical intimacy
- e) Insults based on the sex of the worker
- f) Condescending or paternalistic remarks
- g) Sending sexually explicit messages (by phone, email or other forms of communication or social media platforms)

6.3 Non-verbal Conduct

- a) Display of sexually explicit or suggestive material
- b) Sexually-suggestive gestures
- c) Whistling
- d) Leering

6.4 Anyone can be a victim of sexual harassment, regardless of their gender and of the harasser and could be staff or student. The University recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is illegal, unwanted and unwelcome by the person against whom the conduct is directed. All sexual harassment is prohibited whether it takes place within or outside the University Campus.

7. Complaints Procedures

7.1 Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. Sule Lamido University Kafin Hausa recognises that sexual harassment may occur in unequal relationships (i.e. between a staff and his student) and that it may not be possible for the victim to inform the alleged harasser.

7.2 If a victim cannot directly approach an alleged harasser, and the alleged harassment persists, he/she can approach one of the designated staff or committee responsible for receiving complaints of sexual harassment.

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

- a) immediately record the dates, times and facts of the incident(s)
- b) ascertain the views of the victim as to what outcome he/she wants
- c) 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
- d) keep a confidential record of all discussions
- e) respect the choice of the victim

8. Types of Complaint Mechanism

8.1 Informal Complaint Mechanism

If the victim wishes to deal with the matter informally, the designated officer/committee will:

- a) give an opportunity to the alleged harasser to respond to the complaint
- b) ensure that the alleged harasser understands the complaints mechanism

- c) facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the committee to resolve the matter.
- d) ensure that a confidential record is kept of what happens
- e) follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped .
- f) ensure that the above is done speedily and within fourteen days of the complaint being made

8.2 Formal Complaints Mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism can be employed to resolve the matter.

8.2.1 Where a formal complaint is resorted to, the designated officer/committee who initially received the complaint will refer the matter to appropriate committee to initiate a formal investigation. The officer/committee may deal with the matter or refer it to appropriate disciplinary committee (Student Disciplinary Committee, Junior Staff Disciplinary Committee and/or Senior Staff Disciplinary Committee) as applicable.

The officer/committee carrying out the investigation will:

- a) interview the victim and the alleged harasser separately
- b) interview other relevant third parties separately
- c) decide whether or not the incident(s) of sexual harassment took place
- d) Produce a report detailing the investigations, findings and any recommendations
- e) if harassment is established, decide what the appropriate action.
- f) follow up to ensure that the recommendations are implemented, that the behavior has stopped and that the victim is satisfied with the outcome.

- g) if harassment is not established, the officer/committee may still make recommendations to avoid unnecessary complains.
- h) keep record of all actions taken.
- i) ensure that the records concerning the matter are kept confidential
- j) ensure that the process is done as quickly as possible and in any event within fourteen days of the formal complaint being made

8.3 Outside Complaint Mechanisms

A person who has been subjected to sexual harassment can also make a complaint outside the University. A victim may report to the Police if they consider it appropriate to do so. Where a victim has personal safety concerns such as the criminal behavior of a harasser, is paramount and recommended reporting to the police. Anonymous report of sexual harassment to the DSS, Police, the court or any other body may be made directly or through online platform. Such reports can be made at any time, in addition to an informal or formal report earlier made. The person making the report should provide as much detail as they feel comfortable with.

9. Sanctions and Disciplinary Measures

9.1 Anyone who has been found to have sexually harassed another person among the Staff or Students under the terms of this policy is liable to sanction under any of the following categories:

Category A: Physical conduct offences

- Dismissal
- Expulsion
- Rustication

Category B: Verbal Conduct Offences

- Suspension
- Demotion
- Transfer

Category C: Non-verbal conduct offences

- Verbal or written warning
- Adverse performance evaluation
- Reduction in wages

9.2 Where a particular misconduct/behavior is not in any of the above categories and sanction not prescribed, the Committee or Body responsible may consider the case and recommend appropriate sanction in accordance with existing university regulations and other extant laws as appropriate.

9.3 The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases including physical violence will result in the immediate dismissal/expulsion of the harasser as the case may be.

9.4 Direct action can NOT be taken against any individual perpetrator of sexual harassment in response to an anonymous report, but the data generated from such reports will be gathered and stored in compliance with data protection laws.

10. Right of Appeal

10.1 The complainant and the harasser have the right to appeal against the decision following the investigation within 21 days of receiving the decision from the investigator. Any appeal must be made in writing, stating the reasons for the appeal.

10.2 On receipt of an appeal, a meeting shall be convened with senior officers who has not previously been involved in the procedure, to consider the appeal. The complainant will be given the opportunity to forward their case and explain why they are not satisfied with the outcome. If it is considered necessary, further investigation could be made.

10.3 The decision of the person presiding over the appeal shall be final.

10.4 If disciplinary action is taken against an individual following a sexual harassment complaint, they will have a right of appeal as set out in the disciplinary policy.

11. Protection from Victimisation

All Staff/Students shall be protected from intimidation, victimisation or discrimination for making a complaint of sexual harassment or for assisting in an investigation. Retaliating against any Staff/Students for complaining about or assisting in an investigation of sexual harassment is a disciplinary offence.

12. Implementation of this Policy

12.1 Sule Lamido University Kafin Hausa shall ensure that this policy is widely disseminated to all relevant persons. All new employees must be trained on the content of this policy as part of their induction into the University.

12.2 Every year, The University will require all Staff/Students to attend an orientation regarding the contents of this policy.

12.3 The Vice-Chancellor shall ensure that all his/her employees/Students and other stakeholders of the University community are aware of the policy.

13. Monitoring and Evaluation

13.1 Sule Lamido University recognises the importance of monitoring this policy and will ensure that it anonymously collects statistics and data relating to its implementation and effectiveness.

13.2 It is the responsibility of the Sexual Harassment committee, supervisors, managers and those responsible for dealing with sexual harassment cases to report on compliance with this policy, including the number of incidents, how they were dealt with and any recommendations made.

13.3 Such report under 13.2 above shall be made periodically as may be required or at least on a yearly basis. Consequently, the University will evaluate the effectiveness of this policy and make necessary changes.

14. Choice and Use of Language

Due to the sensitive nature of sexual harassment cases, the choice and use of language in handling such cases should be done with caution. Terms as “alleged perpetrator”, “complainer” or “victim” should be liberalized in managing any complaint of sexual harassment. Neutral terms such as “Employee A” for example, rather than referring to people as “the complainer” or “alleged perpetrator/accused” may be employed.

15. Documentation

The Technical Working Group will track reported cases of sexual harassment and report at least annually to the Vice-Chancellor concerning the number, nature, trends and disposition for purposes of accountability and transparency.

16. Review

The Policy shall be subject to periodic review after every 5 years or as the need arises based on periodic evaluation of its implementation.

17. Authority

This policy was approved by the Governing Council of Sule Lamido University Kafin Hausa on the 28th day of August, 2025