



DOWEN COLLEGE LAGOS SEXUAL HARASSMENT POLICY

A statement of Sexual Harassment Policy of Downen College Lagos for all employees and students.

1. Objective

The Board of Governors and management hereby affirm its opposition to sexual harassment and have established specific guidelines to address sexual harassment among both employees and students. The policy is to help employees and students recognise, understand, prevent, and take corrective action to address sexual harassment and other inappropriate behaviour of a sexual nature in the workplace and in instructional settings.

2. The Policy in Summary

Inappropriate sexual conduct will not be tolerated and may constitute sexual harassment. Downen College does not condone or tolerate any form of sexual harassment involving employees or students. The school system is committed to the creation and maintenance of learning and a work environment in which all people who participate in school programmes and activities can do so in an atmosphere free from all forms of sexual harassment.

Downen College (DCL) will take appropriate action to prevent and correct behavior that violates this policy. If necessary, the school will also take disciplinary action against employees and students. Employees who violate the policy will be subject to such actions as oral or written reprimand, professional counselling, reassignment, demotion, suspension, or termination. Disciplinary actions for students who violate the policy include a conference, suspension and/or expulsion, depending on the circumstances and severity of the offense.

The policy applies to all sexual harassment incidents involving DCL staff and students and addresses acts committed by a person of either sex against a person of the opposite or same sex. The policy recognises that it is unlawful for employees to commit acts of sexual harassment. Sexual harassment committed by students of either sex against students or staff of the opposite or same sex constitutes inappropriate behaviour and is subject to disciplinary action. The policy

also recognises that employees and students have a right to be free from sexual harassment by others such as contractors, vendors, and volunteers.

It is the responsibility of every employee to recognise acts of sexual harassment and take the necessary action to ensure that such instances are addressed swiftly, fairly, and effectively.

The Policy in Detail

3. What Is Sexual Harassment?

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favours, and/or other inappropriate verbal, written, or physical conduct of a sexual nature that takes place under any of the following circumstances:

- When submission to such conduct is made, explicitly or implicitly, a term or condition of employment, instruction, or participation in other school activities;
- When submission to or rejection of such conduct by an individual is used by the offender as the basis for making personnel or academic decisions affecting the individual subjected to sexual harassment; and/or
- When such conduct has the effect of unreasonably interfering with the individual's work and/or academic performance; or creating an intimidating, hostile, or offensive work or learning environment.

4. Prohibited Conduct

Prohibited conduct may include, but is not limited to, unwelcome behaviour of a sexual nature. For example:

- Grabbing, touching, or patting
- Sexual propositions
- Sexually offensive pictures, videos, magazines, notes, calendars, cartoons, or jokes
- Unwanted flirtations or advances
- Verbal abuse
- Repeated pressure or requests for sexual activities
- Rewards for granting sexual favours or the withholding of rewards for refusing to grant sexual favours

- Graphic comments about an individual’s body or dress
- Sexually degrading names

Such conduct may also constitute sexual harassment. In determining whether prohibited conduct constitutes sexual harassment, consideration will be given to the totality of the circumstances, including the context in which the conduct occurred. Dating or sexual relationships between staff (permanent or contract) and students is prohibited.

5. Expectations

The Board of Governors expects staff and students to be committed to creating and maintaining an environment in which all persons participating in school programmes and activities can do so in an atmosphere free from all forms of sexual harassment.

- DCL’s policy on sexual harassment will be communicated to all staff and students.
- Education programmes, to include all staff and students, will be implemented.
- Staff and students will be informed of procedures to follow for filing complaints of sexual harassment.
- Confidentiality will be maintained in all phases of the complaint process, in accordance with policy and consistent with DCL’s obligation to investigate and address complaints.
- Retaliation against anyone who files a complaint or cooperates with an investigation about sexual harassment is prohibited.

6. Actions for Staff

If you believe you are a target of sexual harassment, you should report such incidents. You may report this information verbally or in writing to your immediate supervisor or principal. When reporting an incident, it is helpful to provide as much information as possible, including the following:

- a. A description of the event(s)
- b. The number of occurrences, with dates and places
- c. The names of any witnesses
- d. Any documents or other exhibits, if appropriate.

Where to Go for Help

Staff may contact any of the following individuals or offices for guidance, information, or resolution of a sexual harassment issue:

- Your supervisor or head of school

7. Actions for Students

If you believe that you are the target of sexual harassment or the focus of inappropriate behaviour, you should report such incidents to your parents and school authorities. You may report the information verbally or in writing to the principal, a guidance counsellor, a teacher, or another staff member.

When reporting an incident, it is helpful to provide as much information as possible, including the following:

- a. A description of the event(s)
- b. The number of occurrences, with dates and places
- c. The names of any witnesses
- d. Any documents or other exhibits, if appropriate

Students may receive guidance, advice, support, and/or advocacy from school staff, including administrators, counsellors, teachers, or other staff. A written statement should be completed and submitted.

8. Reporting Procedure

Any person who believes he or she has been the victim of sexual harassment by a member of staff (permanent, contract, or government staff e.g., Youth Corp members or invigilators), a parent, or a student of the school is encouraged to discuss the alleged acts immediately and confidentially with any member of senior management. Any complaints of alleged sexual harassment made to the Designated Persons will be discussed fully and confidentially with the person raising the complaint or concern and will require approval of the reporter prior to disclosure or direct investigation of the matter. If, after discussion by the reporting person with one or more of the Designated Persons, it is agreed between the reporting party and the senior management team that a more detailed investigation is appropriate, the following investigative procedure will be followed.

9. Investigative Procedure

Following discussion with one or more of the senior management team, and the agreement of the reporting party that an investigation should be undertaken, the complaint will be made fully known to the head of school and to the school's lawyer (if he has not been previously involved). Once so advised, immediate follow-up in the form of a full investigation by the senior management of the school and schools' lawyer will be conducted. In determining whether alleged conduct constitutes sexual harassment, the totality of circumstances, such as the nature of the sexual advances and the context in which the alleged incidents occurred, will be considered. To assist in the investigation, incidents will be documented, including specifics such as dates, times, witnesses, if any, and a full and clear statement of what transpired. A determination of the appropriateness (or lack thereof) of the particular action will then be made from the facts by the head of school (with the assistance and advice of the school's lawyer), and appropriate action will be pursued expeditiously in each case.

10. Student Sexuality and Sexual Behaviour

Students are expected to treat one another with dignity and respect. We encourage students to make responsible decisions regarding sexuality and to consider the consequences of their decisions in terms of their health, their relationships with others, moral considerations, and the law. The school forbids pre-marital sexual intercourse and other forms of sexual intimacy among students. Students should understand that pre-marital sexual behaviour may result in corrective action. From our concern for their emotional, physical, and spiritual well-being, we also will respond to sexually active students by initiating and fostering open communication between the students and those adults in their lives who may be helpful to them.

11. Public Displays of Affection

Students are encouraged to make responsible choices regarding sexuality. Public displays of affection are prohibited. Examples of such behaviours include, but are not limited to, extended kissing or hugging, lying or sitting together inappropriately, and placing hands on each other in inappropriate ways.

12. Responsive Action

Any employee or student of the school who engages in sexual harassment is subject to immediate and appropriate discipline, up to and including discharge or expulsion. The results of the investigation of each complaint filed under this policy will be reported to the complaining party by the head of school. The report will document any disciplinary action taken by the school as a result of the complaint, and will become part of the personnel file or record of the disciplined individual.

13. Reprisal

Retaliation against any individual who complains of sexual harassment is strictly forbidden by the school, and anyone who practices such retaliation will be subject to immediate discipline, up to and including discharge or expulsion.

14. Non-Harassment

The school recognises that not every advance or comment of a sexual nature constitutes harassment. Whether a particular action or incident constitutes sexual harassment or not requires an objective determination based upon all of the facts and surrounding circumstances. False accusations of sexual harassment can have a serious detrimental effect on innocent parties, are prohibited by the school, and can be cause for disciplinary action up to and including discharge or expulsion.

15. Other Legal Protections

In addition to this policy, there are several other Federal and State measures that protect individuals from sexual harassment discrimination and provide specific prohibitions against acts of discrimination or other unlawful conduct.

16. MONITORING

The policy will be reviewed a year after development and then every three years, or in the following circumstances as approved by the Board of Governors:

- a) Changes in legislation and/or government guidance
- b) As a result of any other significant change or event.

Signed: Principal/Head of School, Mrs. Adebisi Layiwola Date: Aug 30, 2021