



**INDEPENDENT CORRUPT PRACTICES  
AND OTHER RELATED OFFENCES COMMISSION**

# **SEXUAL HARASSMENT POLICY**

# **POLICY**

## **1.1. INTRODUCTION:**

The Independent Corrupt Practices and Other Related Offences Commission (ICPC) is committed to providing a safe and conducive working environment for all its staff, free from discrimination on any ground and from harassment at work including sexual harassment. ICPC operates a zero-tolerance policy for any form of sexual harassment in its offices, treats all incidents seriously and promptly investigates all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action including termination of appointment.

**1.2** In exercise of the powers conferred on me by section 7(1) of the Corrupt Practices and Other Related Offences Act, 2000 (“the act”) and section 70 of the Act, I hereby issue, make and approve the following Policy/Guideline

## **2. DEFINITION OF SEXUAL HARASSMENT**

Sexual Harassment is any unwelcome sexual advance, request for sexual favour, verbal, non-verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that has or might reasonably be expected or perceived to cause offence or humiliation to another.

## **3. ACTS THAT CONSTITUTE SEXUAL HARASSMENT:**

### **(1).Physical conduct**

- a. Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or

inappropriate touching

- b. Physical violence, including sexual assault
- c. Brushing body or object against another

**(2). Verbal conduct**

- a. Demeaning comments on a worker's appearance, age, private life, etc.
- b. Sexual comments, stories and jokes
- c. Sexual advances
- d. Repeated and unwanted social invitations for dates or physical intimacy
- e. Insults based on gender of the person
- f. Condescending or paternalistic remarks
- g. Sending sexually explicit messages (by electronic means)
- h. The use of job-related threats or rewards to solicit sexual favours

**(3). NON-VERBAL CONDUCT**

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

(4). and any other physical, verbal or non-verbal conduct of a sexual nature that creates an intimidating, hostile or humiliating work environment or interfering with work performance.

## **4. SCOPE OF THE POLICY**

Anyone can be a victim of sexual harassment, regardless of sex and of the sex of the harasser. ICPC recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

ICPC also recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between senior and junior officers.

Anyone, including ICPC staff at the headquarters, state offices, Anti-Corruption Academy of Nigeria, Board members of ICPC, staff on secondment from other MDAs (the Police, NSCDC, Fire Service, DSS, etc), Petitioners, Suspects, Witnesses, Contractors and their employees or visitors to the Commission who sexually harasses another in the course of their dealing with ICPC shall be reprimanded in accordance with this policy.

All sexual harassment is prohibited whether it takes place within ICPC headquarters or State offices or outside, including social events, official trips, training venue or conferences.

## **5. COMPLAINTS PROCEDURE:**

A. any person who is subject to sexual harassment shall where possible, first inform the alleged harasser that the conduct is unwanted and unwelcome.

B. a person who wants to make an informal complaint shall report to his/her Head of Department/Unit (where he is an ICPC staff) or his supervisor, who shall document the report and take steps to call the harasser to order.

C. where a person wants to make a formal complaint, he/she shall report to Head of Human Resources or Head of Department or Unit and the report shall be reduced to writing and addressed to the Head of Administration Department with a copy sent to the Board.

D. the Head of Administration Department shall forward the complaint to the Appointments, Promotions and Disciplinary (APD) Committee without delay.

E. the APD shall send the complaint to the Senior Staff or Junior Staff APD Committee as the case may be and the Committee shall promptly set up an ad-hoc committee to investigate the case.

F. the Ad-hoc committee shall conclude its investigation and file a report within 60 days from the date of its inauguration.

## **6. SEXUAL HARASSMENT IN THE CONTEXT OF ICPC ENFORCEMENT MANDATE**

While carrying out ICPC's enforcement mandate, the investigators, prosecutors and detention facility managers, are constantly exposed to persons who may increase the risk or vulnerability to sexual harassment. In order to mitigate this risk.

- a) Officers of the Commission shall dress decently in line with the official dress code at all times while on duty.
- b) Meetings, interrogations, investigations, interviews, detention facility routine and non-routine activities, shall be handled by at least two officers at any time.
- c) Officers shall avoid being in the company of the opposite sex in the dark or suspicious situations while on duty.

**7. TREATMENT OF SEXUAL HARASSMENT WITHIN THE ENFORCEMENT MANDATE**

- a) Where an officer or his/her partner is being harassed in the course of exercising their enforcement duties, an official report shall be made to the Head of their Unit/Department, who after investigation, shall send cautionary notes to the harasser. All of these events shall be documented in the harasser's case file.
- b) Where an officer sees his/her partner harassing a suspect, guest, petitioner, witness, visitor etc., the officer shall, as an obligation to the Commission, call his/her partner to order. Where the partner persists, an official report shall be made to the Head of Unit/Department, who shall investigate and forward the complaint to the APD.
- c) Where a case of sexual harassment is reported by a guest, visitor, witness etc., the officer and his/her partner shall be investigated and if found culpable,

shall face the full sanctions and disciplinary measures in accordance with this policy.

- d) Investigations and decisions on sexual harassment within this context shall be completed within ninety (90) days of reporting to the APD.

## **8. IMPLEMENTATION OF THIS POLICY:**

ICPC shall ensure that this policy is widely disseminated to all staff and other relevant persons including new employees and the content of this policy shall form part of induction training.

It is the responsibility of every Head of Department or Unit to ensure that all his/her officers are aware of this policy.

## **9. MONITORING AND EVALUATION:**

ICPC recognizes the importance of monitoring the sexual harassment policy and shall evaluate its implementation and effectiveness through Human Resources Unit which shall file a report on the policy annually.

## **10. COMMUNICATION OF THE POLICY:**

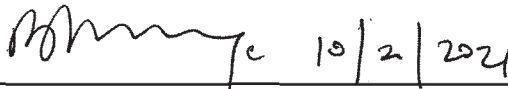
The Head of Human Resources shall communicate the policy to all staff and other person (s) that may be affected by the policy by giving a copy to all staff, posting a copy of the policy on the Commission's website, organizing sensitization and enlightenment programmes on the policy and through other means as may be deemed necessary and effective.

## **11. LIMIT OF THE POLICY:**

This policy does not extend to cases of rape, defilement or any other cases of serious sexual offence, which are criminal in nature.

## **12. STRATEGIES FOR PREVENTING SEXUAL HARASSMENT:**

- a. Officers of the Commission are to dress corporately in line with the official dress code at all-time within the ICPC premises
- b. Meeting with external parties should be by 2 or more officers at a time (external parties include petitioners, witnesses, official visitors, etc).
- c. Officers should avoid being in the company of members of the opposite sex in a dark or in suspicious situations within the office premises.



10/2/2024

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**PROF. BOLAJI OWASANOYE, SAN**  
Chairman, ICPC