



PETROLEUM TRAINING INSTITUTE, EFFURUN

ANTI-SEXUAL HARASSMENT POLICY

AUGUST, 2025

VISION STATEMENT

To become the leading oil and gas technological Institute in Africa.

MISSION STATEMENT

PTI's mission is to provide competent technological human resources, through quality training, research and consultancy for the Petroleum and Allied Industry.

OUR CORE VALUES

An employee of the Petroleum Training Institute is a public servant. As public servants, staffers are under obligation to serve the country with their talents, in honest stewardship and with spirit of patriotism. They are expected to discharge their duties to the best of their abilities.

The PTI as a Federal Government-owned Technological Institution puts the employee in a special role as public servant and business entrepreneur. Consequently, these dual roles obligate the PTI employees to imbibe the following values:

- Excellence
- Entrepreneurship
- Integrity
- Commitment
- Innovation

INTRODUCTION

The Petroleum Training Institute (PTI) is the leading oil and gas Institute in Africa for the training of middle level manpower to provide competent technological human resources for the Oil and Gas and allied industry.

Over the years, the Institute has achieved this mandate in a safe learning environment for academic excellence free from discrimination and harassment including sexual harassment.

However, in order to sustain this practice and in line with the Federal Government's directive to create a safe learning environment, the Institute is proposing to domesticate the Anti-Sexual Harassment Policy developed by the Independent Corrupt Practices and other related offences Commission (ICPC) for institutions and organizations in Nigeria.

All employees and students of the Petroleum Training Institute are therefore under obligation to run their courses and carry out their duties in the Institute with high level of moral rectitude which the Anti-Sexual Harassment Policy seeks to maintain.

POLICY STATEMENT

The Petroleum Training Institute (PTI) is committed to providing a safe environment for all its employees and students, free from discrimination on any ground and from harassment at work including sexual harassment.

PTI will operate a zero tolerance policy for any form of sexual harassment in the institute. It will treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

Sexual harassment is not mutual and is unwholesome. It is painful, demeaning behavior and usually involves abuse of power. Sexual harassment psychologically and physically harms its victims directly and indirectly. In the context of educational institutions, persistently high rates of sexual harassment disrupt students' ability to learn and succeed in their studies and have a damaging impact on the educational experience of many students. The far-reaching effects of such damage is best imagined when it is recognized that students' experiences in schools shape their future lives' value and behavior. Furthermore, sexual harassment undermines the integrity of the educational system.

The Petroleum Training Institute does not tolerate sexual misconduct, including sexual harassment and it is committed to creating and maintaining a community where everyone is treated with dignity and respect and every student/employee can participate in its academic programmes and activities and can work and learn together in an atmosphere free from all forms of abuse or harassment, exploitation or intimidation.

The Petroleum Training Institute's position is that sexual harassment is a form of gross misconduct and as such, it will respond promptly and effectively to reports of sexual harassment and take appropriate action to prevent, correct and if necessary discipline such behavior. Every member of the Institute should be aware that PTI is strongly opposed to sexual harassment and that such behavior is prohibited both by **LAW** and this **POLICY**.

Through this policy, the Petroleum Training Institute desires to ensure that its academic and social environments are free from all forms of sexual harassment issues, making it a **SAFE HAVEN** to learn and build **HEALTHY COMMUNITIES**.

OBJECTIVES

The objectives of this policy are three-fold:

- To sensitize the Institute's community about the evils of sexual harassment and thereby engender collective responsibility for eradicating it.
- To establish an institutional framework that encourages victims of sexual harassment to exercise their rights, maintain their dignity and resist submission to its pressures.
- To take appropriate action to eliminate sexual harassment at the Petroleum Training Institute, Effurun.

SCOPE OF POLICY

This Policy is applicable to all staff, students, and volunteers who work at, or visit the Petroleum Training Institute, or take part in the Institute's programmes and activities at any location.

GUIDING PRINCIPLES

This policy is guided by the principles of:

- Compassion, support and assistance to survivors.
- Fair hearing and inclusion.
- Prompt attention.
- Confidentiality and privacy.
- Protection from retaliation.
- Effective sanctions for policy violation
- Respect for freedom of expression including academic freedom
- Integrity of the academic system.

1.0 DEFINITION OF SEXUAL HARASSMENT

1.1 SEXUAL HARASSMENT is unwelcome sexual advances, request for sexual favours and other visual, verbal or physical conduct of a sexual nature which:

- a. When submitted to or rejected, implicitly or explicitly affects a person's employment or educational opportunity or unreasonably interferes with a person's work or educational performance or
- b. Implicitly or explicitly suggests that submission to or rejection of the conduct will be a factor in academic or employment decisions or evaluation, permission to participate in any institution activity or
- c. Has the purpose of or creating an intimidating, hostile or offensive working or learning environment

Sexual harassment also occurs if an individual treats a person less favorably because that person has rejected or submitted to unwanted conduct of a sexual nature or that is related to gender identity or sex and which has had the purpose or effect described in this section.

In this scenario, the person who treats someone less favorably might not be the person who engaged in the unwanted conduct.

Sexual harassment may occur in hierarchical relationships between superiors and subordinates and between peers. It may also occur between persons of same sex or persons of opposite sex. It may consist of repeated actions or may even arise from a single incident.

In determining whether a reported conduct constitutes sexual harassment, due consideration will be given to the nature of the conduct and the totality of the circumstances including the context in which it occurred.

Sexually harassing behavior may be physical conduct of a sexual nature or verbal conduct of a sexual nature or non-verbal conduct of a sexual nature and includes but is not limited to:

- a. Pressure for a dating, romantic or intimate relationship.
- b. Unwelcome touching including hugging, massaging or kissing
- c. Staring or leering.
- d. Suggestive comments or jokes.
- e. Sexual innuendos such as hooting, lip-smacking
- f. Intrusive questions about a person's life or body
- g. Unnecessary familiarity such as deliberately brushing up against a person.
- h. Unwanted invitations (pressure) to go out on dates.
- i. Unwelcome sexual advances including requests for sex or other forms of sexual favors.
- j. Feigned "accidental" brushing against sexual parts of the body
- k. Insults, profanities or taunts based on sex.
- l. Sexually explicit physical contact.
- m. Obscene phone calls.
- n. Sexually explicit emails or SMS messages
- o. Stalking, cyber-bullying with sexual undertones

p. Sexual assaults.

Sexual harassment, can further, be defined as the wrongful use of power to force an individual to carryout sexual/sexting act against his or her wish or consent. Sexual harassment is an unwelcomed sexual advance/improper body contact or touch that is undesirable or offensive to the victim or recipient, from a harasser or a person (staff or student).

Sexual harassment however does not refer to the occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, is personally offensive, debilitates morale and therefore interferes with a learning environment.

2.0 CONSENSUAL SEXUAL OR ROMANTIC RELATIONSHIP

There are special **risks** in any sexual or romantic relationship between individuals in inherently unequal positions and parties in such relationship assume such risks. In the context of academic institutions, such positions include but are not limited to teachers and students, mentor and mentees, adviser and advisee, coach and athlete. Conflict of interest is presumed but not exclusive to all instances when a staff of the institute is in a position to grade, evaluate, or supervise a student (whether full-time or part-time) or allocate opportunities to a student such as access to institute's accommodation and participation in work-study program.

Even when they have an appearance of being consensual, they may be less consensual than is perceived by the individual whose position confers power or authority. Indeed the relationship is less likely to be positively perceived by the party in subordinate position especially when considered in retrospect. For these reasons PTI strongly disapproves and discourages such relationships. Furthermore, it has the option to take any action necessary to minimize the impact of such relationships on the integrity of its system in line with the laid –down regulations.

Consensual romantic relationships between members of the PTI community may begin as consensual but evolve into situations that lead to charges of sexual harassment.

3.0 RESPONSIBILITIES

PTI is responsible for taking all reasonable steps to prevent sexual harassment and ensuring its position is widely known through all levels of the Institute's activities. In furtherance of this, PTI will ensure the wide dissemination of this policy, provide training on the contents and standards of this policy, introduce other measures such as gender sensitivity training for students and staff at all levels and orientation training for new students and staff on appropriate behavior.

PTI will ensure that appropriate procedures are identified to handle sexual harassment complaints and the specific officers responsible for dealing with complaints are identified and trained to mediate and conciliate grievances.

It is further responsible for ensuring that:

- a. Complaints are treated in an impartial, sensitive, fair, timely and confidential manner.
- b. Sexual harassment reporting is encouraged regardless of who the offender might be.

- c. Appropriate training is provided to those who manage and implement this policy.
- d. Widespread awareness and understanding of sexual harassment is provided.
- e. This policy and its procedures are monitored and reviewed regularly.

All students, members of staff and other persons associated with PTI have the duty to comply with this policy and as such all are encouraged to read it thoroughly and ensure that they have a good understanding of the issues surrounding sexual harassment, particularly in recognizing in themselves as well as in others behaviors which constitutes sexual harassment.

4.0 DISCLOSURE AND REPORTING SEXUAL HARASSMENT

4.1 DISCLOSURE

A disclosure involves the sharing of information about an incident of sexual harassment with another person. Disclosures can be made to anyone.

PTI recognizes that a person who discloses an incident of sexual harassment may not want to make a formal report. Where, however, it becomes aware of a disclosed serious incident of sexual harassment, it will endeavor to provide support and assistance to the complainant and /or investigate the incident even though it is not formally reported.

4.2 FORMAL REPORTING

Formal reporting refers to providing a formal account or statement about sexual assault or sexual harassment to a person or institution that has the authority to take action. Reporting can be an outcome of disclosure, but it is not the only possible outcome.

4.2.1 WHO MAY REPORT SEXUAL HARASSMENT

- i. A complainant
- ii. Any member of the Institute's community may report conduct that may constitute sexual harassment under this policy.
- iii. Any supervisor or other person to whom a report has been made.
- iv. Any person who otherwise becomes aware that sexual harassment has taken place.

4.2.2 TO WHOM A FORMAL REPORT MAY BE MADE

PTI recognizes the importance of providing a choice of reporting mechanisms and officers (male or Female) to complainants in order that they may feel comfortable to come forward to report or discuss an incident. It also recognizes that in some instances, the immediate officer to whom a report may be appropriately made may be too close to the problem to serve without bias. As such, PTI ensures that a network of officers within the institute is available to receive reports. Reports of sexual harassment may be made to any of the persons or offices specified below:

- a. Principal/CE
- b. Registrar.
- c. Directors
- d. Heads of Department.

- e. Hall Masters/Mistresses and Hall Wardens of the Institute.
- f. Counselors in the Student Counseling Centre.
- g. Chief Medical Officer
- h. Institute's Independent Sexual Harassment Committee.
- i. Chief Security Officer and Deputies.
- j. Chaplains of the Institute
- k. Imam of the Institute
- l. Representative of Student Union Government, Congresses and Associations within the Institute.

4.2.3 FORMAT OF A REPORT

There is no prescribed format for reporting sexual harassment. It may be reported verbally, but it is preferable that it be in writing. A complaint of sexual harassment shall include:

- a. The name, address, contact number(s) and any other relevant details of the complainant.
- b. The name, address contact number(s) and any other relevant details of the person(s) against whom the complaint is made.
- c. A summary of the allegation(s) within the knowledge of the complainant that constitutes the basis of the complaint being made. This shall include the nature, date, time and place where the alleged incident occurred.
- d. A report should contain every available supporting document, written or electronic. Where however the report does not contain such documents, it shall not bar the Independent Sexual harassment Prohibition Committee from taking necessary steps to determine the complaint.
- e. A case can be reported in an anonymous manner through the available channels provided by the institute. For example, suggestion boxes mounted in strategic places such as the Principal's office, SERVICOM and Gender Units can be used to receive anonymous and non-anonymous reports.

5.0 SUPPORT AND ASSISTANCE

PTI recognizes that the first response a person receives when they share their experience of sexual harassment is key to their recovery as well as ensuring justice. It also recognizes that anyone in the institute may be a "first responder of a disclosure or formal report of sexual harassment," hence it will sensitize and equip members of its community to being compassionate, empathic and supportive when a person discloses or makes a formal report to someone. More specifically it shall endeavor to ensure that every person who makes a complaint of sexual harassment is provided:

- a. Access to information about appropriate emergency health, counseling, security and accommodation providers.
- b. Referral to internal and external support services, and
- c. Assistance to ensure understanding of the available options, including reporting to police and making a formal report to the institute.
- d. Information about and assistance with navigating the Institute's formal report and misconduct investigation processes.

- e. Information about, and support navigating, the Institute's special consideration process if the student wishes to apply.
- f. Regular and timely communication about the process and its resolution.

In some cases, students or members of staff who have experienced harassment may require special consideration for assignments and exams, particularly in terms of assignment extensions and examination referrals. At the time of disclosure or making a formal report, the institute's staff to whom the incident is disclosed should advise whether they have the authority to grant or support special consideration to the student. If not, the details of the staff member/s that can approve or at least actively support –special consideration should be given to the person making the report. The staff shall also provide support to the complainant in taking the step.

PTI will ensure that where special consideration is sought or granted, this process will be as efficient as possible to minimize further stress and will endeavor to protect the confidentiality and privacy of the student by limiting the circulation of any information about the nature of the special consideration as much as the circumstances allow.

6.0 METHODS OF DEALING WITH SEXUAL HARASSMENT

The most effective complaints procedure offers a range of options for dealing with sexual harassment. However, all the options must respect the principle that everyone involved in a dispute relating to sexual harassment is entitled to fair hearing in the investigation and adjudication of the dispute.

The following are the primary methods for dealing with sexual harassment in PTI. Some are informal while others are formal methods. They need not be followed in a specific order. However, recognizing that early informal methods are often effective in correcting questionable behavior, they are encouraged by this policy.

6.1 Consultation

Consultation about sexual harassment shall be available from the Academic Directors, Head of Student Affairs, Heads of Academic Department and Training officers, Counselors in the student Counseling Centres, Hall Administrators/Wardens/Mistresses/Master, Chaplains/ Imams of the Institute, Director, PTI Medical Centre and the institute's Ombudsman.

6.2 Direct Communication

An individual may act on sexual harassment concerns personally by addressing the other party directly in person or by writing a letter describing the unwelcome behavior, its effect and asking that it be stopped . Any of the persons named in paragraph "6.1" above and who is consulted may help an individual plan what to say or write and can likewise counsel any person who receives such communication. A reprisal against any individual who in good faith initiates such a communication violates this policy.

6.3 Third Party Intervention

When third party intervention is used, third party or third parties will meet with each of the persons involved; try to clarify perceptions and attempt to develop a mutually acceptable understanding that can ensure that they are comfortable with each other in their future interactions, Formal mediation sessions may be explored in appropriate cases.

Possible outcomes of third –party interventions include explicit agreement about future conduct, changes in classes or other relief as may be appropriate e.g. apologies and a commitment not to engage in such behavior again. The third party intervener will establish a follow-up program to ensure the behavior does not reoccur.

Even if the case is being resolved informally, so long as it is handled by any of the specified officers, it is the responsibility of the third- party intervener to prepare a detailed report on the proceedings and outcome and submit it in confidence to the Principal/CE and although these proceedings may be deemed informal, depending on the seriousness of the case, incidents of sexual harassment which constitute serious misconduct will be pursued for possible disciplinary action.

7.0 INTERNAL GRIEVANCE, APPEAL AND DISCIPLINARY PROCESSES

Where all the earlier mentioned processes fail or are not preferred by the complainants, the formal internal grievance process may be invoked. The applicable procedure generally consists of the following:

- a. The complainant or any person acting on behalf of the complainant submits a written or electronic statement via channels provided by the Institute in strict confidence to the Principal/CE describing the specific offensive act or acts, the time, location and circumstances under which they took place, and any other information or document relevant to the case. The complainant should identify the alleged harasser as well as any witness to the act(s) or anyone else to whom the incident has been mentioned and remedies sought by the complainant. The statement must be signed and dated by the complainant.
- b. Upon receipt of a complaint of sexual harassment, the Principal/CE shall transmit the complaint to the Chairman of the Independent Sexual Harassment Prohibition Committee within 14 working days from the date the complaint was received.
- c. Upon receipt of a complaint of sexual harassment, the Independent Sexual Harassment Prohibition Committee shall take immediate steps to investigate, determine and reach a final written decision on the complaint within 45 working days from the date of receipt of the complaint from the Principal/CE.
- d. The Secretary of the Independent Sexual Harassment Prohibition Committee shall communicate the final decision of the Committee in writing and within seven (7) working days of giving the decision to all parties to a sexual harassment complaint, whether they participated in the Committee’s proceedings or not.
- e. The fact that a complaint does not contain supporting documents shall neither prevent the receipt of the complaint nor bar the Committee from taking necessary steps to determine the complaint.

- f. The Committee shall ensure the alleged harasser is provided with a copy of the complaint specifying the identity of the complainant in order to advise him or her of the allegation.
- g. In the determination of a complaint of sexual harassment, the Sexual Harassment prohibition Committee shall be guided by the need to ensure equality of all parties to a complaint and the guarantee of substantial justice in each complaint.

8.0 COMPOSITION OF THE INDEPENDENT SEXUAL HARASSMENT PROHIBITION COMMITTEE

- a. The Sexual Harassment Prohibition Committee shall have a total of seven (7) members.
- b. The membership of the Sexual harassment Prohibition Committee shall consist of at least two (2) students, two (2) academic staff members of the Institute and two (2) non-academic staff members. The total membership shall include at least three (3) female including a staff from the Legal department.
- c. The Chairman and members of the Sexual harassment Prohibition Committee shall hold office for a period not exceeding two (2) years from the date of appointment as may be specified in writing by the Registrar.
- d. Any five (5) members of the Sexual harassment Prohibition Committee shall form a quorum. The members present shall select an ad-hoc Chairman and/or secretary for the purpose of hearing the complaints brought before it if the substantive Chairman and /or Secretary are absent.
- e. The final decision of the Sexual Harassment Prohibition Committee shall be by a simple majority; rendered in writing and read openly to the parties of a complaint by the Chairman of the Committee. If the parties or any of the parties are absent, such decision can be transmitted through the established channel for reportage.
- f. A decision of the Committee is submitted to the Principal/CE and both the complainant and the alleged harasser shall be informed of the decision. Where the head of the Institute is the alleged harasser, the decision shall be submitted to the Governing Council of the Institute.
- g. The Institute shall provide information on the kind of support available to the victim and how to access it such as trauma counseling, psychosocial, academic support and protection against reprisals.
- h. The complaint must be brought within (6 months) of the action complained of. Informal resolution efforts will not automatically extent the time limit for filing a grievance or appeal although in appropriate circumstances, the period used for such informal resolution efforts may be considered in granting extension of time.
- i. Depending on the complexity of the case, complainant and the alleged harasser will be periodically contacted within (14) days about the status of the investigation in respect of the complaint made, whether action is being taken and what type of action is being taken.
- j. Either the complainant or the alleged harasser who is dissatisfied with the outcome of a proceeding may appeal to the Institute's Management within ten (10) days.

- k. In appropriate cases, other disciplinary action may be commenced and the applicable disciplinary procedure will depend on the status of the individual whose conduct is in question and the discipline will depend on the severity of the conduct and may lead to termination of employment.

9.0 EXTERNAL MECHANISMS

Where sexual harassment is prohibited by law, in addition to the internal processes, a complainant may pursue complaint directly with any appropriate formal agency authorized to receive such complaint by law. However, a violation of this policy may exist even when the conduct in question does not violate the law.

10.0 OTHER PROCEDURAL MATTERS RELATING TO THE GRIEVANCE PROCESSES

10.1 INVESTIGATION

- a. The Petroleum Training Institute will ensure that an investigation is carried out in a timely manner by appropriately trained individuals and where necessary, will permit adjustments to be made to the disciplinary procedure to address any actual and/or perceived imbalances between the complainant and the alleged harasser, e.g. balancing the interest of protecting the complainant from additional trauma when giving evidence and the need to uphold fundamental principles relating to fair hearing such as right of the person accused to hear the evidence against them and right to “test” that evidence.
- b. If significant facts are contested, an investigation will be undertaken. The investigation will be conducted in a way that respects, to the extent possible, the privacy of all persons involved. For example, unless significant differences exist in the information obtained during this stage of the investigation, third party witnesses will not be brought into the investigation. Both the complainant and the alleged harasser will be briefed once the investigation is completed and a determination including sanctions (where appropriate) is made.
- c. The Independent Sexual Harassment Prohibition Committee shall, in writing, notify the parties of a complaint, in person, a request for their written response or appearance for hearing with regards to a lodged complaint.
- d. All hearing on a complainant of sexual harassment by the Independent Sexual Harassment Prohibition Committee shall be closed to the public and records of relevant documents including evidence securely archived and preserved by a designated member of the Independent sexual harassment Prohibition Committee.
- e. Where a respondent who has been duly notified of a complaint lodged against him or her neglects or refuses to participate in the investigation process, the Independent Sexual Harassment Prohibition Committee may proceed with its determination of the complaint.

- f. The Independent Sexual Harassment Prohibition Committee may within its discretion discontinue further conduct/Investigation of a case where the complainant fails to cooperate with the Committee in the exercise of its functions.
- g. A complainant may, in writing or through other available channels provided by the Institute, withdraw a complaint brought before the Independent Sexual Harassment Prohibition Committee at any stage before the final decision.

10.2 TIME FRAME

Any investigation of sexual harassment shall be conducted and completed within 45 working days of receiving a formal report of the incident.

10.3 CONFIDENTIALITY

The officials of PTI responsible for implementing this policy will keep confidential the names and details related to sexual harassment complaint unless disclosure is necessary as part of the disciplinary, corrective or record-keeping process.

10.4 PRECAUTIONARY MEASURES/ACTION

When a formal report of sexual harassment is received, the Institute will consider whether urgent precautionary measure should be put in place, pending an investigation or other process. Where considered necessary, it will impose at an early stage, precautionary measures on a student or staff that is alleged to have engaged in sexual harassment, such measures may include:

- a. Imposing no-contact directives on the harasser which may entail making appropriate arrangements to ensure separation of the complainant and alleged harasser in delivery of teaching and supervision e.g. moving the respondent into another tutorial group or laboratory group.
- b. Suspending the alleged harasser from their studies in the case of a student or employment duties in the case of a staff.
- c. Excluding/restricting the person concerned e.g. (prohibiting the person concerned from going to certain accommodation blocks, using the sports facilities or from attending a placement).

Any decision to impose a precautionary suspension on a student or to place a staff member off duty can have serious consequences. Hence, to mitigate the risk to safety of any person based on the report made and the risk of injustice recognizing that the report has not been investigated and may not be substantiated, PTI will impose only reasonable and proportionate precautionary measures after undertaking a risk-assessment of the case taking into account the interests and welfare of the complainant and the alleged harasser, ascertaining the potential effectiveness and impact of precautionary measures on persons other than the parties, the type of misconduct, the circumstances of the incident and the circumstances of the individuals involved.

10.4 RECORD-KEEPING

The Human Resources Development (HRD) Department shall keep confidential records of reports of sexual harassment and the actions taken in response to those reports for the purpose of strategic planning for preventing sexual harassment but no identifying information may be retained in cases where the individual accused of sexual harassment is not informed that there was a complaint.

10.5 SANCTIONS AND PENALTIES

Where it is determined that an allegation of sexual harassment in breach of this policy is proved against any person, appropriate sanctions and penalties will be imposed taking into consideration the circumstances of each case including the severity of the offence, degree of harm to complainant, the record of previous disciplinary history of the harasser, non-adherence to interim directives such as no-contact orders and on-going threats to the complainant or the Institute's Community, use of drugs or force in the commission of the act.

Sanctions and penalties shall include but not be limited to:

- a) Caution
- b) Reprimand
- c) Probation and counseling
- d) No-contact directive
- e) Campus access restriction
- f) Verbal or written warning
- g) Counseling or Therapy
- h) Loss of oversight, teaching and supervisory responsibilities.
- i) Loss of privileges
- j) Probation, Demotion, Loss of pay increase.
- k) Revocation of offer of admission, Employment or license to trade (in the case of vendors on campus).
- l) Rustication of student (student –specific)
- m) Termination of contracts for Contractors
- n) Expulsion
- o) Withholding of degree (Employee)
- p) Denial of Privilege including pay increment, promotion, denial of appointment to administrative positions and removal from administrative positions including debarment from such positions
- q) Termination of appointment
- r) Dismissal

Where a complaint against a student or a member of staff is not upheld, and no disciplinary action is taken against them, PTI recognizes that the complainant and the person may continue to require assistance and support and will endeavor to continue to provide the parties access to the relevant support services.

11.0 RETALIATION

This policy prohibits retaliation against a person who reports sexual harassment, assists someone with a report of sexual harassment or participates in any manner in an investigation or resolution of a sexual harassment report.

Retaliation is a serious violation for which the offender may be subject to disciplinary measures irrespective of the merits of the sexual harassment allegation.

Retaliation includes threats of any kind, intimidation of any kind, reprisals and or other forms of adverse actions related to employment or education.

12.0 INTENTIONAL FALSE REPORT

- I. Sexual harassment frequently involves interactions between persons that are not witnessed by others. This often means that allegations may be difficult to prove, but lack of corroborating evidence or “proof” should not discourage reporting under this policy.
- II. However, individuals who make reports that are later found to have been intentionally or maliciously false or without regard for the truth will be subject to disciplinary action. Such measures shall be without prejudice to the obligation of a person who falsely accuses another to publicly clear the name of the person against whom the false complaint was made.
- III. This provision does not apply to reports made in good faith, even if the facts alleged in the report are unsubstantiated on investigation. Insufficient evidence or lack of evidence shall not be sufficient to establish false, vexatious or malicious reporting. Each case must be handled on its own merit.

13.0 EDUCATION AND TRAINING

1. PTI believes that the single most effective deterrent against sexual harassment in the Institute is awareness hence, the Institute is committed to:
 - a) Implementing educational and training programmes for the Institute’s Community, which may include mandatory education and training on Sexual Harassment and Sexual violence.
 - b) Producing and disseminating sexual harassment and sexual violence policy documents at the beginning of every academic session.
 - c) Organizing awareness and sensitization campaigns on sexual harassment at least twice in an academic session.
 - d) Establishing Community Anti Sexual Harassment Day
2. Persons who are aware of conduct which constitutes sexual harassment are less likely to behave in a manner that is offensive to their colleagues. Also persons who are aware of their rights and avenues of recourse will be more assertive and forthcoming in putting a stop to the offensive behavior. Hence, as part of its commitment to providing a harassment free working and learning environment, PTI will take effective steps to widely disseminate this policy to members of its community through publications in

prints and online, websites, new employees orientations, students orientations and other appropriate channels of communications.

3. To promote compliance with this policy, and familiarity with its reporting mechanisms and procedures, the Human Resources Development (HRD) Department, Students Affairs Department and Security Department shall make educational materials available to all members of the Institute's Community.
4. All individuals designated to receive report will be provided with structured training relating to handling sexual harassment allegations.

14.0 DOCUMENTATION

The Human Resources Development (HRD) Department will track reported cases of sexual harassment and report at least annually to the Principal/Chief Executive, concerning the number, nature, trend and disposition for purposes of accountability and transparency.

15.0 REVIEW AND EVALUATION

This policy shall be subject to periodic review (3-5 years) based on periodic evaluation of its implementation

16.0 AUTHORITY

This policy was approved by the Management of the Petroleum Training Institute, Delta State, Nigeria.

On this 20th day of August, 2025