



DIGNITY AT WORK POLICY

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Scope and Purpose

Reaffirming the organisational and behavioural principles, commitments and obligations set out in the overarching INTERSOS Safeguarding Framework, this policy specifically sets out INTERSOS' approach to preventing and addressing **Discrimination, Intimidation, Harassment, including Sexual Harassment, Abuse of Authority and Bullying in the workplace** and should be read in conjunction with INTERSOS' Child Safeguarding Policy for safeguarding children and young people and Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) of adults in the communities in which we work.

This policy applies to all INTERSOS employees (international, national personnel at country, regional and HQ level), interns, volunteers, consultants, contractors, board members, plus accompanying partners and family members of international staff. Whenever employees or staff are mentioned in this document, it is intended to include all these groups of people. This policy does apply not only to our organisation, but it extends to cover those we work with. INTERSOS' staff and partners having agreements with INTERSOS are expected to comply with the principles and reporting requirements outlined in this Policy. Through partnership agreements, INTERSOS shall ensure the Dignity at Work policy is part of the due diligence processes for these organisations and seek assurances of their application.

For the purposes of this policy, unless otherwise stated, INTERSOS adopts the following descriptions of discrimination, intimidation, harassment, sexual harassment, abuse of authority and bullying, which will collectively be referred to as “**prohibited conduct**”:

Discrimination is any unfair treatment or arbitrary distinction based on a person's race, sex, gender identity and expression, age, nationality, skin colour, social or ethnic origin, religion, language, marriage or civil partnership, religion or belief, membership of a trade union, disability, personal or family care needs, pregnancy, motherhood, or fatherhood (including adoption), and sexual orientation. Discrimination may be an isolated event affecting one person or a group of persons similarly situated or may manifest itself through harassment or abuse of authority.

Intimidation is the unreasonable use of status or authority to require or coerce an individual to perform an action or task, which the individual knows to be inappropriate and/or disrespectful, illegal, or in direct conflict with INTERSOS policy or procedure.

Harassment consists of unwanted conduct, whether verbal, physical or visual, which is related to a person's race, sex, gender identity and expression, age, nationality, skin colour, social or ethnic origin, religion, language, marriage or civil partnership, religion or belief, membership of a trade union, disability, personal or family care needs, pregnancy, motherhood or fatherhood (including adoption), and sexual orientation with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct may take place on a single occasion or on several occasions.

Sexual Harassment consists of unwanted conduct of a sexual nature, which has the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct may take place on a single occasion or on several occasions. Sexual Harassment may take the form of unwelcome physical, verbal or non-verbal conduct directed at a person or group of persons, which may include - but is not limited to - the following: (a) unwanted physical contact, ranging from touching to sexual assault and rape; (b) verbal

forms of sexual harassment including unwelcome sexual innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults, comments about a person's body or enquiries about a person's sex life or sexual orientation; (c) non-verbal forms of sexual harassment including unwelcome gestures, whistling, indecent exposure or the unwelcome display of sexually explicit pictures or objects; d) unwanted messages of a sexual nature that are sent via email, SMS, skype, voice messages and other electronic means, whether using INTERSOS IT/devices or personal mobiles/equipment; or (e) harassment of a sexual nature that is linked to recruitment/employment opportunities, promotion, training or development opportunities or the offer of salary increments or other employee or worker benefits in exchange for sexual favours.

Abuse of authority is the improper use of a position of influence, power, or authority against another person. This is particularly serious when a person uses their influence, power, or authority to improperly influence the career or employment conditions of another, including, but not limited to, appointment, assignment, contract renewal, performance evaluation, working conditions or promotion. Abuse of authority may also include conduct that creates a hostile or offensive work environment which includes, but is not limited to, the use of intimidation, threats, blackmail, or coercion. Discrimination and harassment, including sexual harassment, are particularly serious when accompanied by abuse of authority.

Bullying is any repeated offensive, abusive, intimidating, malicious or insulting behaviour which: (i) makes the recipient feel upset, threatened, humiliated or vulnerable or undermines their self-confidence or causes them to suffer stress or feel upset; and (ii) a reasonable observer would identify as amounting to bullying behaviour.

This policy shall supersede and replace all prior INTERSOS policies, guidelines and frameworks regarding the matters covered hereby.

Policy Statement

All staff and partners shall be free to carry out their work with dignity and respect in an environment that is free from discrimination, intimidation, harassment, including sexual harassment, abuse of authority and bullying. **INTERSOS will take a zero-tolerance approach** to any behaviours which compromise these basic rights, in and outside of the workplace, whether during or outside of working hours. In addition, INTERSOS is committed to ensuring its approach is consistent with national and international disclosure obligations, and shall comply with all applicable laws, statutes, regulations and codes from time to time in force, including all relevant Italian laws related to protection from discrimination, intimidation, harassment, including sexual harassment, abuse of authority and bullying, and applicable laws in the countries where INTERSOS operates. Where the guidance in this policy conflicts with any applicable laws or regulations, the higher standard must always be observed.

APPLICATION

Core principles

- Everyone at INTERSOS should be treated with **dignity, respect, and courtesy**. Discrimination, bullying or harassment of any kind should not be tolerated.

- Everyone at INTERSOS shall support and encourage an environment which values all people and does not cause embarrassment, conflict of interest, harassment, alarm, or distress to another employee nor discriminate unfairly or unlawfully on any grounds.
- Discrimination, intimidation, harassment, sexual harassment, abuse of authority and bullying by INTERSOS staff and associates in the workplace constitute **acts of gross misconduct** and are, therefore, grounds for termination of employment or contract/agreement. **Sexual harassment** by INTERSOS staff and associates is **grounds for disciplinary action** up to and including dismissal.
- When an INTERSOS staff or associate develops **concerns or suspicions regarding discrimination, intimidation, harassment, sexual harassment, abuse of authority and bullying** by a fellow worker against another member of staff of INTERSOS or funded entities, he or she must immediately report such concerns via the established reporting mechanisms, otherwise it can lead to disciplinary action up to and including dismissal.
- INTERSOS does not prohibit staff from beginning **relationships with each other** and/or **with staff from funded entities** but all staff also from funded entities and other representatives engaged in or beginning relationships with other staff or representatives **must declare their relationships** as soon as possible to their line managers and relevant HR, even if the relationship is at an early stage and may not continue. This will be treated confidentially.

All INTERSOS staff and associates are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report concerns is grounds for disciplinary action pursuant to the INTERSOS Charter of Values, Code of Conduct, Safeguarding Framework and Associated Policies¹. This action may include **termination of contract** and may result in the case being forwarded to the local authorities in accordance with applicable national laws.

Commitments

INTERSOS is committed to **promoting a work environment free of discrimination, intimidation, bullying, harassment, including sexual harassment, and abuse of authority**, in which all people are treated with dignity and respect **and to tackling behaviour and conduct which is deemed to be inappropriate or prohibited**.

In taking this approach, INTERSOS understands that:

- It is the impact of the behaviour on a victim or complainant which determines discrimination, intimidation, harassment, including sexual harassment, abuse of authority and bullying.
- Behaviour that is acceptable to some employees may cause embarrassment, distress, or anxiety to others.
- All concerns about the behaviour of others must be taken seriously and will be dealt with promptly.
- A complainant will not be victimised or retaliated against for bringing a complaint.

Individual reactions to discrimination, intimidation, harassment, including sexual harassment, abuse of authority and bullying can vary from simple irritation to extreme depression. Being the victim or seeing this taking place in a team or an office can negatively affect a whole range of people in a number of different ways, e.g., loss of employee morale, the development of a culture of apathy and

¹ Secretary-General's Bulletins ST/SGB/2019/8 Addressing discrimination, harassment, including sexual harassment, and abuse of authority (10 September 2019)

negativity, and decreased performance on the part of the affected staff/team. INTERSOS will prevent prohibited behaviour by:

- **Undertake reference checks** of external candidates during recruitment processes to ensure that individuals who have a documented history of sexual harassment and other prohibited conduct are not appointed or engaged.
- Request that **contractors, suppliers, and partners adhere to the zero-tolerance policy** on prohibited conduct and commit to taking adequate action if faced with allegations of prohibited conduct and inform them that failure to do so may lead to the termination of contractual arrangements.
- Develop standards, including a programme of **targeted trainings**, to be conducted preferably in person and aimed at building skills to effectively communicate with affected individuals and alleged offenders and to respond appropriately. The target audience for such programmes are managers, staff with safeguarding responsibilities, and HR personnel providing support or likely to provide support to affected individuals, especially those who are targets of sexual harassment.
- Raise **awareness** on issues relating to **diversity, respect and equality** and build skills on **bystander techniques** for intervening in situations of prohibited conduct.

All INTERSOS staff and partners have a **duty and a right to report** any suspected incidents of prohibited conduct. Failure to do so may result in disciplinary action. INTERSOS takes all concerns and reports seriously. Staff members (or others) who report concerns will be supported throughout the process. The information provided will be kept confidential and all steps will be taken to ensure support and protection in any actions taken.

If INTERSOS becomes aware of an allegation of prohibited conduct involving **attempted or actual assault, including sexual assault**, appropriate precautionary measures shall be taken, without delay, to address the safety and security concerns of the affected individual, including instituting flexible working arrangements or other means to achieve the physical separation of the affected individual and the alleged perpetrator.

Roles and Responsibilities

In addition to the roles and responsibilities outlined in the INTERSOS Safeguarding Framework, the following functions will have dedicated responsibilities to help INTERSOS prevent and respond to behaviour or act of prohibited conduct:

All staff/representatives shall

- **Treat all staff with dignity and respect;**
- Be aware of their own conduct, behaviour and the potential impact this could have on other people;
- Be aware that while some people aren't likely to take offence to personal remarks or sarcasm, others will;
- **Avoid colluding with or ignoring** any inappropriate behaviour;
- Know that they **do not have to tolerate discrimination, intimidation, bullying, abuse of authority or harassment at work;**
- Ask for clarification if you are unsure of the standards or behaviours expected;



- **Immediately report** any concern through one of INTERSOS feedback mechanisms if you suspect that prohibited conduct is taking place.

Head of Missions shall

- Create and sustain an **atmosphere of tolerance and respect** within their Mission and between teams.
- **Lead by example** through a fair, consistent and open management style
- Ensure their **staff are familiar with this policy** and with acceptable and unacceptable standards of behaviour.
- **Challenge unacceptable behaviour** in the workplace.
- Inform their line manager (or another senior manager/the HQ HR team) if they suspect or become aware of any instance of discrimination, intimidation, harassment, abuse of authority and bullying. **As it is likely to constitute a safeguarding concern, it's therefore important that all issues are reported to the Director of HR or the Global Safeguarding Coordinator as soon as possible** to ensure that INTERSOS is meeting internal and external reporting timescales and expectations. Incidents need to be reported before an investigation takes place.
- Ensure that **local labour laws, equality laws and support services are identified** and understood to enable actions to be taken in accordance with local legislations.
- If become aware that an allegation of prohibited conduct involving **attempted or actual assault, including sexual assault, immediately report to Global Safeguarding Coordinator and Director of HR** to take appropriate precautionary measures, without delay, to address the **safety and security concerns of the affected individual**, including instituting flexible working arrangements or other means to achieve the physical separation of the affected individual and the alleged offender.

Human Resources Department shall

- Verify the successful applicant's identity, their employment history and qualifications prior to confirmation of any offer of employment.
- Obtain at least three professional **references, including from the last two-line managers and an HR representative**, and follow up on any concerns
- **Conduct external checks** prior to confirmation of offers. This includes a police clearance check or equivalent in the country of origin, anti-terrorism checks if required by the donor and a personal declaration stating any criminal convictions, including spent convictions.
- Provide **contractual legal advice and guidance** during any investigation and disciplinary action relating to prohibited conduct.
- Provide **support and guidance to Head of Missions and/or country HR managers** (where in place) as to how to deal with complaints or suspicions of inappropriate or unacceptable behaviour at workplace.
- Give **informed and appropriate advice to any member of staff** who requests it.
- Provide **briefing on this policy to raise awareness** on the fact that everyone is expected to be treated with dignity and respect.



Global Safeguarding Coordinator

- In close collaboration with INTERSON Director of HR, ensure that complaints are taken seriously, are investigated and dealt with promptly, assertively and decisively;
- In close collaboration with INTERSON HR Director, provide **support and guidance to Head of Missions and/or country HR managers** (where in place) as to how to deal with complaints or suspicions of inappropriate or unacceptable behaviour at workplace
- In close collaboration with INTERSON HR Director, give **informed and appropriate advice to any member of staff** who requests it.
- In close collaboration with INTERSON HR Director, provide **briefing on this policy to raise awareness** on the fact that everyone is to be treated with dignity and respect.

Resolving Complaints

All complaints will be reviewed and assessed whether an investigation will be required in accordance with INTERSON's misconduct policy.

Informal Approach

In some cases, it may be possible to **rectify matters informally**. Sometimes people are not aware that their behaviour is unwelcome and an informal discussion can lead to greater understanding and an agreement that the behaviour will cease or change. If the employee feels that they are able to deal with the situation informally, then an informal resolution should be sought in the first instance:

- The complainant may wish to **speak directly to the perpetrator** and inform him/her that his/her **behaviour is unwelcome** and that they wish it to stop. In many cases the person may be unaware that their conduct is offensive and when told, will easily and willingly adapt their behaviour so that no further offence is caused. Specific examples of actions or conduct which are causing offence should be provided.
- If the complainant does not want to speak to the person directly, **an email can be sent** which explains the issue and the impact it is having with examples provided.
- If the complainant is reticent to raise the issue with the alleged perpetrator for whatever reason, or if they have raised the issue and the problem continues, they should **speak preferably to the relevant HR or another senior manager**.
- Reports can also be made to the relevant **Regional Director** and **Regional HR or HQ HR** if it is deemed appropriate and necessary or if any guidance or advice in reporting is needed. However, to encourage swift resolution, INTERSON encourages as many issues to be reported within the management line as possible.
- The manager should gather information about the offending behaviour including examples. With this information, they shall make the alleged perpetrator aware of the concern and provide examples and describe the impact it has had. The alleged perpetrator will have the opportunity to respond to the allegation.
- At this stage, depending on the circumstance and the severity of the situation, a number of options are available to bring about a resolution: a) a **meeting** takes place to discuss any underlying causes of the misunderstanding which could include unclear priorities or deadlines, miscommunication or language barriers b) a **mediated conversation** between the two individuals takes place c) one or both individuals modify their behaviours: rules and

standards of behaviours are re-clarified and/or an **apology is given** and a commitment made to prevent any re-occurrence

- In discussion with the regional and/or HR team, the manager shall then decide on any action to be taken and if the behaviour is unacceptable, warn the offender that if the behaviour continues, it will be **treated as a disciplinary issue**. If the behaviour is found to be severe, a warning may be warranted at this stage as well.
- The situation shall be monitored to **ensure no further harassment or bullying** takes place and the complainant is not deliberately excluded or subjected to any other detrimental treatment. The complainant should be aware that they can approach the investigating manager and/or a member of the HQ HR team at any time if there is any reoccurrence.
- Notes must be kept of any informal actions taken for future reference.

Formal Resolution

When informal resolution proves unsuccessful or is deemed by the manager, senior manager and/or HQ HR Department to be inappropriate or insufficient, the following **formal resolution process** must be followed:

- The employee should put the full details of the **complaint in writing** to their line manager or the next level of management, if the line manager is the person the employee feels is harassing or bullying them. Alternatively, the employee may send the complaint to the Head of Mission, their Regional Director, a member of the HQ HR Team, the Global Safeguarding Coordinator or through any other available INTERSOS reporting channels.
- INTERSOS will endeavour to acknowledge receipt of the complaint within three working days.
- The complainant shall be contacted to verify if they understand and agree that the issue is being dealt with as a **formal grievance**. If not, the complainant shall be advised to follow the above-described informal route.
- In line with INTERSOS Misconduct Policy, **the possible suspension of the person** against whom the allegations have been made, shall be considered.
- INTERSOS **Misconduct Policy** sets out the process INTERSOS shall follow to ensure that concerns are addressed fairly, consistently and as quickly as possible.
- The complainant will be supported throughout this process by a member of the HQ HR team
- An appropriate Investigating Officer shall be appointed to fully **investigate the concerns**.
- This could involve:
 - Meeting with the complainant and the perpetrator to review the issues. At any such meetings, individuals will have the right to be accompanied.
 - Meeting with any potential witnesses.
 - Reviewing any available evidence.
 - Once the investigation is complete, the Investigating Officer on the basis of the evidence gathered shall provide a formal response in writing.
 - Where a grievance is upheld, this may result in a sanction being taken and INTERSOS Misconduct Policy invoked.
 - Complaints made by a third party or about a third party shall be investigated in the same way as far as possible.

Even if a formal complaint is not made, **INTERSOS reserves the right to investigate any issues relating to prohibited conduct** when brought to the attention of the HR team at HQ or a manager,

if it is believed that the organisation would be in breach of its wider duty of care and safeguarding responsibilities if it failed to do so.

All claims of discrimination, intimidation, harassment, abuse of authority or bullying shall be treated seriously. INTERSOS will ensure that, as far as possible, all steps are taken to maintain **confidentiality** as far as is consistent with progressing the complaint. Any breaches of confidentiality shall be treated seriously and may result in disciplinary action.

Malicious complaints

INTERSOS will assume all allegations have been made in good faith and that the employee genuinely believes they have suffered discrimination, harassment or bullying, whether that proves to be the case after investigation. Where an allegation is not upheld, it does not mean the complaint was malicious. The complainant may still feel that they have been subjected to discrimination, bullying or harassment but there was not the necessary evidence to substantiate the allegations. If a complaint is judged **to be entirely false** and made with the deliberate intention of discrediting another employee, the complainant shall be subject to INTERSOS Misconduct Policy.

Support

INTERSOS recognises that employees involved in prohibited conduct at work may experience emotional or psychological reactions to their experiences. **Appropriate support** will be made available to those concerned, including: psychological support, paid time off, work relocation/reassignment and other measures decided on a case-by-case basis.

TO REPORT A CONCERN, YOU CAN:

- Do this verbally or in writing to your Line Manager, HR, Head of Mission, country programme staff with safeguarding responsibilities or
- Send an email to: complaint@intersos.org or
- Send a WhatsApp message to: +39 3808970033
- Fill an incident report and put it in one of INTERSOS feedback boxes.

For reporting a complaint at mission level, please refer to the existing Complaint Response Mechanism in each INTERSOS mission, which includes a dedicated email address and phone number.

REFERENCES

This policy should be read in conjunction with the following documents: Equal Opportunities Policy, Misconduct Policy, Safeguarding Framework, Code of Conduct, Charter of Values, Child Safeguarding Policy, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH), Anti-Modern Slavery Policy, Environmental Policy, Data Protection Policy, Whistleblowing and Investigation policy, Guidance on local customs and legal requirements in the country of operation, Secretary General Bulletin ST/SGB/2019/8, International Labour Organisation (ILO) Violence and Harassment Convention, 2019 (No.190)

APPROVAL AND DATES

This policy was approved on 6 December 2023. This version of the policy takes effect on 23 March 2024 and will be reviewed in 36 months' time.

POLICY OWNER

Director of Human Resources department
