

POLICY AND PROCEDURES AGAINST SEXUAL HARRASSMENT, ABUSE AND INAPPROPRIATE BEHAVIOUR

For Felm (Suomen Lähetysseura)

1. INTRODUCTION

Felm is a partner organization of the international work of the Evangelical Lutheran Church of Finland. Our international work consists of mission work, development cooperation and peace work through cooperation with partners in 30 countries. Promoting human dignity and justice we work for a positive change with and for people in vulnerable situations.

Sexual harassment and inappropriate behaviour are against the law and human dignity. Felm has a policy of zero tolerance, following up on all complaints and a strong commitment to prevent any misconduct. This policy paper states our principles and procedures against sexual harassment, abuse, and inappropriate behaviour. Felm has a policy paper for ensuring child safety and personal integrity and a code of conduct provided by the Act Alliance.

2. PURPOSE AND SCOPE

2.1. The purpose of this policy paper against sexual harassment, abuse and inappropriate behaviour is to prevent all forms of inappropriate behaviour and sexual harassment, violence and abuse within Felm and its cooperation with partner organisations. It also provides guidelines on how to act when inappropriate behaviour, sexual harassment, violence, or abuse appear. It seeks to protect all members of the staff but also every member of the communities whom Felm in any way aims to assist, work with or advocate for.

Felm's values are: Christian hope, neighbourly love, protection of human rights, reliability and transparency. Furthermore, Felm advocates gender justice. These values build a strong base, reason, and obligation for eradicating all sorts of sexual harassment, abuse, violence and abuse of authority, or inappropriate behavior of any sort and for upholding bodily and mental integrity and dignity of every individual.

This policy aims to:

- Emphasize that physical and mental integrity of each person are valued and safeguarded at all levels of Felm's work. This includes active measures against inappropriate behaviour, sexual harassment, and abuse.
- Ensure that governance structures for Felm and its partners are created to eliminate any type of inappropriate behaviour, sexual harassment, violence, or abuse, including abuse of authority.
- Provide safe, reliable, and confidential reporting of any misconduct.
- Guarantee legally accountable and highly ethical practices.
- Promote a culture of respect for each person's mental and physical integrity and safety and an environment that especially acknowledges gendered forms of harassment, violence, and discrimination.
- Ensure that vulnerable populations are not disadvantaged or exploited by staff members or their associates, or any persons in positions of authority.
- Endorse that it is a professional and ethical obligation of all staff members to report any suspicions of sexual abuse in Felm or inside the activities supported by Felm or influencing work funded by it.
- Staff members of Felm are obligated to train and inform partners and stakeholder groups about Felm's ethical principles and practices expressed in this document.

2.2 This Policy applies to all Felm employees (full time, part time, temporary and casual as well as volunteers) and also to non-Felm implementing partners who access funds from Felm through the Felm funding mechanisms, and any other individuals working for or representing Felm.

3. POLICY PRINCIPLES

3.1 The Felm Policy Against Sexual Harrassment and Inappropriate Behaviour is one of zero tolerance. The Felm governing bodies shall not tolerate sexual harrassment, abuse or violence or any other inappropriate behaviour by Felm staff, volunteers, or by the external implementing partners of Felm.

3.2 Felm is committed to the prevention, detection and investigation of all forms of sexual harrassment and inappropriate behaviour, whether these are attempted from within or outside the organisation.

3.3 Felm is committed to ensuring that concerns raised by staff, partners or stakeholders are investigated fairly, equally and in a responsible manner.

4. DEFINITIONS

- **Misuse of power**

A misuse of power by someone in a position of authority who can use the leverage they have to oppress persons in an inferior position or to induce them to commit a wrongful act.

- **Sexual exploitation and abuse**

Sexual exploitation covers actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse includes actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. (WHO)

- **Sexual harrassment**

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Additionally, any ongoing pattern of sexist behaviour can create an environment that is intimidating, hostile, offensive, or disturbing. (UN and European Institute for Gender Equality)

- **Sexual violence**

Sexual violence is defined as any unwanted sexual act, attempt to obtain a sexual act, sexual comments or advances, or acts to traffic, or otherwise directed. These acts against a person's sexuality using coercion are sexual violence, by any person regardless of their relationship to the victim, in any setting, including but not limited to home and work. Coercion can cover a whole spectrum of degrees of force. Apart from physical force, it may involve psychological intimidation, blackmail or other threats. (WHO definition)

- **Inappropriate behaviour**

Inappropriate behaviour includes negative behaviour such as

- harrassment - offensive, belittling or threatening behaviour that is unsolicited, and may be repeated.
- Bullying - repeated abusive and offensive behaviour, which in some circumstances may involve inappropriate physical behaviour and aggression and violence.

- Excluding or isolating a person from the daily interaction of their community.
- Spreading rumours or false information or otherwise discrediting a person on purpose.
(Felm policy on harassment and inappropriate behaviour)

5. WHAT TO DO WHEN SUSPICIONS ARISE?

Strengthening governance is the best way to prevent sexual harassment. Clear regulations and policies are also needed when suspicions of sexual harassment or other unethical actions appear.

The reporting mechanism prevents sexual harassment and strengthens the organisation's accountability. The reporting mechanism also acts as part of Felm's occupational safety and health work and supports its risk management mechanism.

Reporting is always relevant when there is reason to believe that sexual harassment or an unethical act has occurred. Reporting does not require supporting evidence. Felm cannot encourage or approve the use of measures that might endanger the reporter's safety or force the use of illegal actions.

Reporting

Felm staff, Felm Volunteers and any other persons working for or representing Felm with knowledge of sexual harassment or inappropriate behaviour shall inform Felm occupational safety and health.

Local partners of Felm shall notify the Felm management (regional/headquarters) if the subject of concern is a member of Felm staff. Felm employees and volunteers, in most cases, shall raise any concerns with their line manager or supervisor. If this is not possible, any person they trust should be used in lieu. If the direct line manager is the subject of concern or complaint, they should speak or write to a more senior manager inside Felm's organisation. The regional director (or possibly other staff member) is obligated to report each reported suspicion and case to Felm occupational safety and health at the headquarters in Helsinki.

If the subject of concern is a member of a partner organisation, the reporter of the incident shall use the reporting link on Felm's home page.

All information will be handled with high confidentiality. The reporter of the incident will be provided follow-up during the process of investigation. It is also possible for everyone to report anonymously through the reporting link which is placed on Felm's home page.

If Felm staff or Volunteers are affected, professional crisis counselling and support is available. Contact HR for more information.

Report sexual harassment and abuse: www.suomenlahetykseura.fi/ls_en/

In order to ensure more efficient and accountable investigation based on reports, it is recommendable to report by using personal names. It is also recommendable to use public computer and public email when reporting. All personal information will remain confidential and will not be given to third parties.

The person doing the reporting is responsible for providing accurate information. It is forbidden to report by using someone else's identification or otherwise providing information with unjustified motives.

Reporting systems shall not be used for inappropriate purposes, for example to harm any organisation or individual.

Reporting of sexual harassment practices can include the following areas:

1. Your name, contact information and organisation (not compulsory if it is preferable to stay anonymous)?
2. What happened?
3. When and where did it happen?
4. Who was involved? Who else might have been involved?
5. Which partner organisation/project/country?
6. Any supporting documentation?
7. Who else might have information on the case?
8. How does your allegation relate to Felm?
9. Have you taken any other action in relation to this case?

Investigation

All reported information will be investigated. Further actions are taken based on the investigation. Reported data and evidence of the reported incident must be protected and be available only for those who need the information to carry out their duties.

The following guidance is intended to help those (in Felm staff) receiving information to react properly to safeguard the interests of all parties involved.

- Write down the facts you have heard in as much detail as possible. Start making written notes of all subsequent developments in the case.
- Keep the information as confidential as possible (“need to know” basis only). You cannot be sure who is involved.
- Consider the risks from different people’s point of view. Protect both the reporter of the incident and the suspect(s) until some clarity about the case can emerge.
- Contact the occupational safety and health at Felm Helsinki headquarters in order to negotiate the appropriate actions to take.
- Contact the management of the partner organisation if needed.
- Discuss the need for police involvement. Evidence might be needed later on.
- Secure the evidence and prevent further losses: protect all possible documents, make sure technical evidence is left untouched and isolated.
- Inform those bringing the issue to your attention that their message has been received and that action is being taken, without forgetting confidentiality.

Disciplinary measures

Concerns and suspicions should not be the basis for disciplinary action before proper investigation is conducted.

If disciplinary actions concern a Felm employee, they may be taken under applicable labor law regulations. When criminal actions are suspected, Felm reserves the right to contact the police. In complainant offences, the person affected is free and encouraged to contact the police themselves. Felm support is available.

The partner organisation is responsible for decisions concerning their own staff members, although in many cases mutual considerations might be needful. When criminal actions are suspected, Felm requires the partner organisation to contact the local authorities. Depending on the case, Felm might use reported data for future decision-making.

If the investigation shows incidences of sexual harassment, the following actions may be taken:

- The payment of support is suspended;
- A date is set by which the conditions for further support must be met;
- The support or part of it already received by the partner organisation must be returned;
- In some cases, no further payments of support are made;
- In some cases, a criminal proceeding takes place;
- In severe cases the partnership with the partner organization may be finished temporarily or conclusively.