



Plan International USA

FREEDOM FROM HARASSMENT AND VIOLENCE POLICY

Effective date: October 2024

Freedom from harassment and violence policy

Summary

Plan International USA is committed to providing a work environment that is free from all forms of discrimination and conduct that can reasonably be considered harassing, coercive, violent or disruptive. Plan will not tolerate actions, words, jokes or comments based on an individual's sex, race, color, religion, national origin, ancestry, citizenship, veteran status, physical or mental disability, sexual orientation, gender identity or expression, age or any other characteristic protected by law. This policy considers harassment that occurs in-person and virtually.

To reinforce this commitment, Plan will conduct regular training and has developed this policy against harassment alongside reporting procedures for employees who have been subjected to or witnessed harassment. This policy applies in all environments that are related to the employment relationship, whether on Plan premises or elsewhere. This policy supplements the global policy for the prevention of sexual harassment, exploitation, and abuse and should be read and understood in conjunction.

Note that while this policy sets forth our goals of promoting a workplace free of harassment and violence, it is not intended to limit Plan's ability to intervene if conduct is unacceptable but does not satisfy the definition of harassment or violence. This policy does not include an exhaustive list of unacceptable behaviors and other behaviors outside of this policy may be deemed unacceptable.

Policy

Each staff member and associate of Plan USA has a responsibility to contribute to a healthy workplace and will keep the workplace free from any form of harassment and violence. This policy is intended to empower employees to speak up and foster a culture of accountability and respect and shall be posted on Plan USA's external website.

Prohibition of sexual harassment

Sexual harassment is defined as unwanted sexual advances, requests for sexual favors, and other visual, verbal or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person - employee, donor or other individual affiliated with Plan - of the same or different sex as the harasser.

It is important to note that someone may consider a behavior to be sexual harassment even if the offender did not mean it to be taken that way. No manager is to threaten or insinuate, either explicitly or implicitly, that an employee's refusal or unwillingness to submit to sexual advances will affect the employee's terms or conditions of employment. The following is a non-comprehensive list of conduct which may constitute sexual harassment:

- Unwanted sexual advances.
- Exchange of money, employment or employment benefits, goods, or services for sex, including sexual favors or other forms of exploitative behavior.
- Visual conduct that includes leering, looking a person up and down and making sexual gestures.
- Displaying or exposing others to sexually suggestive objects, photographs, cartoons, posters, etc.

- Verbal conduct that includes making or using derogatory language. For example, comments about an individual's body, sexually degrading words used to describe an individual or suggestive or obscene correspondence.
- Repeatedly asking out a person who is not interested.
- Physical conduct that includes kissing, touching, assaulting, impeding or blocking.
- Inquiries into one's sexual experiences or discussion of one's sexual activities.
- Sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense. This action will be reported to the authorities.
- Sexual relationships between staff and program participants, no matter their age.

Prohibition of other types of harassment

It is also against Plan's policy to engage in verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of sex, race, color, religion, national origin, ancestry, citizenship, veteran status, physical or mental disability, sexual orientation, gender identity or expression, age or any other characteristic protected by law (or that of the individual's relatives, friends or associates) that:

- has the purpose or effect of creating an intimidating, hostile or humiliating work environment;
- has the purpose or effect of unreasonably interfering with an individual's work performance;
- otherwise adversely affects an individual's employment opportunities.

The following conduct also constitutes as harassment:

- Actions directly creating a hostile work environment (i.e. Manager ordering employee to do non-work-related tasks)
- Epithets, slurs, negative stereotyping, jokes, or threatening, intimidating, or hostile acts that relate to a protected characteristic (such as race); or
- Written or graphic material which denigrates or shows hostility toward an individual or group because of a protected characteristic and is circulated in the workplace or placed anywhere on Plan's premises. This includes materials placed on an employee's desk or on any Plan equipment or bulletin boards. This also includes materials visible in the virtual setting during online meetings.
- Outing an employee's sexual orientation or gender identity without their permission.
- Repeatedly and intentionally using the wrong pronouns.
- Denying an employee access to a bathroom consistent with their gender identity.

Note that the list above is not intended to be comprehensive. Other conduct may also constitute harassment if it falls within the definition of harassment set forth above. All such harassment is prohibited in all circumstances, including on social media and text messaging.

Prohibition of workplace violence

Plan USA has zero tolerance for violence or threats of violence against any member of the workforce, any other persons in the workplace, or its property. If faced with these situations, the organization will take swift action to protect the rights of employees and others. Violence or threats of violence include but are not limited to:

- Any act that is physically abusive or
- Any physical or verbal threat, behavior, or action which is interpreted by a reasonable person to carry the potential to harm or endanger the safety of others, to result in an act of aggression; or to destroy or damage property.
- Having possession or control of any firearm, deadly weapon or prohibited knife, as legally defined, while on Plan's property.

- Any act of intimidation, which is defined as a physical or verbal act toward another person, the result of which causes that person to reasonably fear for their safety or the safety of others. It includes but is not limited to stalking or engaging in actions intended to frighten, coerce or induce distress.

Reporting procedure

Reporting of harassment and violence

Plan USA cannot rectify situations involving harassment or violence if it is unaware of the offensive conduct. An employee who believes that the actions or words of a manager, employee, volunteer, board member, consultant or any other person associated with Plan constitutes harassment or violence has a responsibility to report or complain about the situation as soon as possible.

Anyone who believes that she/he has witnessed harassment or violence directed toward other employees has a responsibility to report the situation as soon as possible. The report or complaint should be made to one of the following:

- Any supervisor
- A member of the People & Culture Team
- A member of the Executive Team
- The CEO
- The Chair of the Audit Committee of Plan’s Board of Directors at planboard@planusa.org
- TO REPORT ANONYMOUSLY use Plan’s Safecall hotline, by phone at 1.866.901.3295, online at www.safecall.co.uk/report or email at plan@safecall.co.uk.

An emergency, perceived emergency or suspected criminal conduct shall be immediately reported to the local police department.

Investigation Procedure

Investigations of harassment or violence

All allegations of harassment or violence will be promptly investigated and employees are requested to cooperate in any investigation. It is the responsibility of the People & Culture team and Law, Governance and Compliance team to formulate an investigation plan collaboratively. You will be requested, but not required, to put your complaint into writing. To the extent practicable under the circumstances, confidentiality will be protected against unnecessary disclosure. An investigation will generally include a private interview with the person making the report. It will also generally be necessary to discuss allegations with the accused individual or with other employees.

Plan will inform relevant authorities and cooperate with investigations when applicable and as necessary. When Plan has completed its investigation, it will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct, of the general results of the investigation; however, Plan will not release the details of a confidential investigation.

For the purposes of a federal grant or contract, if Plan determines that the conduct of any Plan associate violates this policy, the VP of Humanitarian Programs and/or VP of Programs, in consultation with the Sr. Director of LGC must report the offense to the Agreement Officer, the Mission Director, the Office of Inspector General and the employee, and must recommend a course of action. Plan will provide necessary medical and psychosocial support that is needed.

On an annual basis, Plan’s People & Culture team will inform the Board of Directors on the number of cases reported in the past year, in conjunction with the President/CEO. On at least a monthly basis, the President/CEO will be informed of any allegations of misconduct in the prior month and be updated on any ongoing investigations.

Disciplinary action

If it is determined that inappropriate conduct has been committed by an employee, Plan will take appropriate disciplinary action, up to and including termination of that person’s employment. This may include other forms of disciplinary action that Plan deems appropriate under the circumstances, including disclosure of termination for cause, as necessary. Single instances of harassment that are deemed extreme are also subject to termination.

Retaliation or harassment against a person making a report in good faith will not be tolerated. Deliberately false or misleading reports of harassment or violence under this policy will be handled as incidents of unacceptable personal conduct and the employee making such false or misleading reports will be subject to disciplinary action under the organization's disciplinary policy.

Other information

Plan encourages employees to bring concerns about possible harassment or violence to its attention. Employees may also direct inquiries or file a formal complaint with either or both government agencies responsible for enforcement of employment discrimination laws. Using Plan’s complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim. The laws prohibiting workplace harassment, including sexual harassment, are enforced by:

<p>In RI:</p> <p>Rhode Island Commission for Human Rights 180 Westminister Street, 3rd Floor Providence, RI 02903</p> <p>Phone: 401-222-2661 Fax: 401-222-2616 Website: http://www.richr.ri.gov/</p>	<p>In DC:</p> <p>DC Commission on Human Rights 441 4th Street NW, Suite 290 North Washington, DC 20001</p> <p>Phone: 202-727-0656 Fax: 202-727-9589 Email: Commission.COHR@DC.Gov Website: https://ohr.dc.gov/commission</p> <p>EEOC field office: 131 M Street NE 4th Floor, Suite 4NW02F Washington, DC 20507-0100</p> <p>Phone: 1-800-669-4000 Fax: 202-827-2349 Website: www.eeoc.gov/field/washington</p>
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