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**POL 03041**      Violence Free Work Environment

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**PURPOSE:**


To define FHI 360 policy with respect to work environment violence, including gender-based violence, physical assault, and weapons possession.

**SCOPE:**

This policy applies to all FHI 360 Personnel worldwide, and to Suppliers and Supplier Personnel to the extent set out below.

**DEFINITIONS:**

1. *Complainant*                      A person or party who makes a complaint under this policy.
2. *FHI 360 Personnel*                FHI 360 employees, officers, members of the Board of Directors, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of FHI 360.
3. *Gender-based Violence*            Violence that is directed at an individual based on their biological sex, gender identity, or perceived adherence to socially defined norms of masculinity and femininity. It includes physical, sexual, verbal, and psychological abuse; threats; coercion; arbitrary deprivation of liberty; and economic deprivation - whether occurring in public or private life.
4. *Premises*                              Company-owned or leased buildings and surrounding areas such as sidewalks and parking lots; company-owned or leased vehicles; and private vehicles brought onto company premises or used to conduct company business.
5. *Program Participant*                Any adult or child who is served by an FHI 360 program, or has contact with FHI 360 Personnel, Suppliers, or Supplier Personnel in connection with or as a result of FHI 360's programs or business activities.
6. *Respondent*                          A person or party against whom a complaint is made under this policy.
7. *Supervisor*                          An employee of FHI 360 who is in a direct supervisory role over the work of one or more employees of FHI 360.
8. *Supplier*                                Any FHI 360 contractor, consultant, vendor, service provider, subcontractor, or subrecipient.
9. *Supplier Personnel*                 A Supplier's employees, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on a Supplier's behalf.
10. *Survivor or Victim/Survivor*        An individual who is currently subject to, or has in the past been subjected to, domestic or sexual violence, dating violence, stalking or other forms of violence.
11. *Weapons*                             Includes all firearms, whether or not the employee has a license or concealed-carry permit, as well as large knives, brass knuckles, clubs, explosives, and other items unnecessary for work and which can be reasonably used to harm

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people. This is not an exhaustive list and other items may constitute as prohibited weapons under this policy.

12. *Work Environment*

This includes work locations such as, but not limited to, FHI 360 offices, supplier or funder offices or facilities, during business travel, compound housing, on work field visits, deployment to humanitarian zones, and in all work interactions in the communities in which we serve. It includes on-site and off-site training workshop events, and conferences, and work-related social events such as office parties, off-site business lunches and dinners, and client or professional group entertainment events.


**POLICY:**

1. General Statement of Policy

- 1.1 FHI 360 prohibits, and will not tolerate, any form of violence or threats of violence in the work environment, by or against any FHI 360 Personnel while on company premises, at company-sponsored events, or while engaged in the performance of employment duties for FHI 360, whether on or off company premises.
- 1.2 FHI 360 Personnel must also not perpetrate any form of violence or threats of violence against Supplier Personnel, Program Participants, or anyone else with whom they interact in work-related situations.
- 1.3 Likewise, FHI 360 is committed to protecting FHI 360 Personnel from violence, whether by other FHI 360 Personnel (including supervisors, direct reports, and co-workers) or people outside FHI 360, such as Supplier Personnel; employees of a Supplier's contractor, vendor, subcontractor, or subrecipient; employees of a funder; Program Participants; members of the communities FHI 360 serves; or anyone else they interact with in work-related situations.
- 1.4 FHI 360 strictly prohibits all FHI 360 Personnel (other than those authorized by the company to carry weapons as part of their job duties) and visitors from possessing weapons of any kind while on company premises, at company-sponsored events, or while engaged in the performance of employment duties for FHI 360, whether on or off company premises.
- 1.5 FHI 360 will follow its Employee Discipline Policy (POL 03011) (up to and including immediate separation from employment) for any employee found to have violated this policy.
- 1.6 FHI 360 maintains a corporate security policy and country specific security manuals specific to the local risks, including an Emergency Management Team that responds to group-scale threats of violence and safety of FHI 360 staff.

2. Conduct Constituting Violence

- 2.1 Prohibited acts or threats of violence may include, but are not limited to, the following:
  - 2.1.1 fighting
  - 2.1.2 shaking or striking another person
  - 2.1.3 throwing objects at another person
  - 2.1.4 injuring another person physically or causing emotional distress to others
  - 2.1.5 FHI 360 personnel discussing violence that they perpetrate outside of the office
  - 2.1.6 engaging in behavior that produces reasonable fear of injury in another person

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- 2.1.7 damaging property intentionally
- 2.1.8 gender-based violence and sexual violence, including attempted or completed rape
- 2.1.9 threatening to injure an individual or damage property, whether verbally, in writing, or through use of threatening body language or gestures.
- 2.2 This list is not exhaustive, and there are other acts that may constitute work environment violence that violates this policy.
- 2.3 FHI 360 Personnel can be affected by violence and report it under this policy even if the conduct is directed at another individual.

3. Reporting

- 3.1 FHI 360 Personnel who experience or become aware of any imminent risk to the safety of FHI 360 Employees or others should immediately contact law enforcement.
- 3.2 FHI 360 Personnel who have been subject to any actual, threatened, or suspected violence, retaliation, or any other conduct prohibited by this policy, or who witness any such conduct, must report the conduct promptly, within 24 hours or as soon as possible under the circumstances, either orally or in writing, by contacting one of the following:
  - 3.2.1 An individual's immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department
  - 3.2.2 FHI 360 local Human Resources (HR) representative or regional or departmental HR Partner
  - 3.2.3 The Chief Human Resources Officer or the Director of HR Partnering (see HR's FHI 360 Connect site for contact information) or
  - 3.2.4 The Office of Compliance and Internal Audit (OCIA) via email at [Compliance@fhi360.org](mailto:Compliance@fhi360.org).
  - 3.2.5 FHI 360 OCIA's Ethics and Compliance Hotline:
    - 1-800-461-9330 in the U.S.
    - +1-720-514-4400 outside the U.S.
    - Skype: +1-800-461-9300
  - 3.2.6 Country-specific hotline numbers listed on FHI 360's reporting website (see next bullet)
  - 3.2.7 OCIA's reporting website either with your name or anonymously (<http://www.fhi360.org/anonreportregistry>).
- 3.3 Anonymous reports are generally more difficult to investigate due to limited information. FHI 360 Personnel are urged to provide as much detailed information as possible about the conduct, including, if possible, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of immediate harm.
- 3.4 FHI 360 Personnel who are HR staff, supervisors or hold a position at director level or above are required to promptly forward the report to OCIA or Headquarters HR via the appropriate reporting mechanism in Section 3.2 above. Local HR staff and Supervisors are strictly prohibited from investigating such reports or taking any action on their own.

4. Support for Complainant

- 4.1 The safety of all those involved is paramount. FHI 360 and the persons involved in implementing this policy will take all reasonable steps to ensure that responding to allegations of violence does not jeopardize the safety of the Complainant or Respondent. Upon receipt of a complaint, FHI 360 will make an immediate assessment concerning the health and safety of the individuals involved and implement temporary

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remedies necessary for safety. During investigations, FHI 360 will take actions necessary to ensure the safety of Complainants.


- 4.2 FHI 360 Personnel may use company benefit programs such as medical coverage, available paid or unpaid leave, and Employee Assistance Programs for support, subject to eligibility requirements and benefit plan terms.

### 5. Non-Retaliation

- 5.1 FHI 360 has a separate policy prohibiting retaliation (Open Door and Non-Retaliation Policy - POL 03004). FHI 360 strictly prohibits any retaliation against FHI 360 Personnel who complain about violence or other violations of this policy or related procedures, or who participate in a violence investigation.
- 5.2 Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be violence or any other violation of this policy, assisting others in reporting violence or policy violations, or participating in investigations under this policy.
- 5.3 Suspected retaliation should be promptly reported via the reporting mechanisms in section 3 of this policy.
- 5.4 FHI 360 Personnel who engage in retaliation will be subject to disciplinary action up to and including separation of employment or other relationship with FHI 360.

### 6. Investigation and Corrective Action

- 6.1 Upon receipt of a report of violence, retaliation, or other violation of this policy, regardless of when the event(s) occurred, HR determines an appropriate course of action based on the nature of the situation.
- 6.2 FHI 360 will make an immediate assessment concerning the health and safety of the individuals involved, take steps to prevent further violence and implement temporary remedies which may include separating the Complainant from the Respondent, placing the Respondent or the Complainant (at the Complainant's request) on administrative leave, or other measures at FHI 360's discretion to ensure safety, confidentiality of the investigation, or allow for a thorough and uninterrupted investigation.
- 6.3 FHI 360 will conduct a sensitive, timely, and thorough investigation in an impartial manner that provides all parties with appropriate due process and maintains confidentiality to the extent possible (see section 8 below for detailed information about confidentiality).
- 6.4 Investigations will generally be conducted by the HR department, but FHI 360 may hire outside investigators when deemed appropriate.
- 6.5 FHI 360 Personnel must cooperate fully with investigations and provide truthful information to investigators.
- 6.6 Investigations typically involve interviews of Complainant and Respondent and others who may have witnessed or otherwise have knowledge of the complaint. A review of relevant records, e-mails, communications, and other facts will be completed. Specific investigation steps will vary based upon the unique circumstances of each complaint.
- 6.7 Upon completion of the investigation, FHI 360 will review the evidence collected and determine whether violence, retaliation, or other violations of this or other FHI 360 policies have occurred.
- 6.8 Where a policy violation has occurred, FHI 360 will take prompt corrective action reasonably calculated to end the prohibited conduct and to deter future violence. Corrective

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action may range from coaching and counseling, performance improvement plans, warnings, transfers, reassignments, demotions, suspensions, or other disciplinary action up to and including immediate separation of employment.


- 6.9 In addition to taking disciplinary action against FHI Personnel found to have violated this policy, FHI 360 also reserves the right to contact law enforcement where appropriate, and to seek any available court restraining order against any individual in order to prevent violence in the work environment.
- 6.10 FHI 360 will cooperate with law enforcement or other regulatory investigations and where appropriate will report credible allegations and violations to law enforcement and/or relevant funders. Such cooperation and reporting will be made under the guidance of the headquarters HR department and OCIA and may include consultation with the Office of General Counsel.

7. Violence Outside the Work Environment

- 7.1 For FHI 360 Personnel experiencing domestic violence or dating violence outside of the official work environment, FHI 360 will work with them to ensure they can access available leave, counseling, and medical care for themselves and/or their children, subject to eligibility requirements and benefit plan terms.
- 7.2 FHI 360 Personnel seeking an order of protection or restraining order as part of their efforts to become safe are encouraged to disclose the existence of a protection or restraining order to FHI 360 and the company will wherever possible, assist them as per the terms of their order that may relate to the FHI 360 workplace.
  - 7.2.1 If applicable, FHI 360 may assist the employee to gather documentation from the workplace, such as emails or voice messages, that could support the employee's efforts in the justice system or otherwise to obtain or maintain safety from the subject of an abuse or harassment allegation.
- 7.3 FHI 360 recognizes that FHI 360 Personnel who are victims/survivors of violence may need time off to obtain legal, medical, or other support to help ensure their health, safety, or welfare or that of their child or other family member. FHI 360 will work in collaboration with the employee to provide reasonable and flexible leave options using available paid leave and other available benefits before requiring an employee to utilize unpaid leave. FHI 360 will take all reasonable measures to maintain the confidentiality of a person who requests leave under this policy, to the extent allowed by law.

8. Confidentiality

- 8.1 FHI 360 shall take all reasonable measures to maintain the confidentiality of disclosures by FHI 360 Personnel regarding violence to the extent allowed by law and unless doing so could risk physical harm to any person and/or jeopardize safety within the workplace.
- 8.2 If FHI 360 Personnel choose to disclose the existence of a protection or restraining order to FHI 360, FHI 360 shall store the order in a confidential personnel or other file.
- 8.3 Information learned through the investigation process will be disclosed only to those FHI 360 Personnel or other persons who "need to know" in order for FHI 360 to fulfill its obligations to investigate and take prompt action.
- 8.4 As required by local law, FHI 360 will provide necessary and appropriate disclosure to local enforcement agencies and will participate in investigations.

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8.5 Nothing in this policy is intended as a guarantee of absolute confidentiality, nor is it intended to curtail employee rights under any applicable laws to discuss work-related matters.

### 9. Other Conduct That Violates This Policy

- 9.1 In addition to violence, retaliation, and other prohibited conduct outlined above, it is also a violation of this policy for FHI 360 Personnel to:
- 9.1.1 attempt to discourage, interfere, or impede any individual from reporting harassment
  - 9.1.2 discourage or impede any individual's participation in any investigation under this policy
  - 9.1.3 knowingly provide false information or make false claims to investigators
    - 9.1.3.1 This policy recognizes that the fact a claim cannot be substantiated does not necessarily make it a false claim.

### 10. Expectations of Suppliers and Supplier Personnel

- 10.1 Suppliers and Supplier Personnel must refrain from perpetrating violence as outlined in this policy.
- 10.2 FHI 360 requires that Suppliers similarly uphold the principles of this policy to prevent violence by and against Supplier Personnel. Failure to do so may result in termination of Supplier's contractual relationship with FHI 360.
- 10.3 FHI 360 requires that Suppliers and Supplier Personnel cooperate fully with investigations of policy violations and provide truthful information to investigators.

### 11. Consequences of Policy Violations


- 11.1 FHI 360 Personnel who violate this policy are subject to disciplinary action (see Employee Discipline Policy - POL 03011) up to and including immediate termination of employment or other relationship with FHI 360. (See 6.8 above.)
- 11.2 Program Participants who violate this policy may be removed from FHI 360 programs and barred from participation on other FHI 360 programs.
- 11.3 Violations of this policy by Suppliers or Supplier Personnel, may result in FHI 360 terminating the Supplier's contract with FHI 360. Further, FHI 360 may pursue any contractual or other legal or equitable remedies that may be available.

*For policy interpretation or questions, please contact an HR Partner.*

## RELATED DOCUMENTS:

### 1. Policies

- Code of Ethics & Conduct
- POL 01032: Protecting Program Participants from Sexual Exploitation and Abuse
- POL 03003: Professional Standards of Conduct
- POL 03004: Open Door and No Retaliation
- POL 03011: Employee Discipline
- POL 03029: Harassment-Free Work Environment
- POL 03051: Administrative Leave

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**2. Standard Operating Procedures**

- N/A

**3. Appendices**

- N/A

**REFERENCES:**

1. N/A

**REVISION HISTORY:**

POL#	Date Reviewed DD MMM YYYY	Summary of Changes
466	1/96	New
446	1/01	Changes reflected in 466A
466A	7/1/03	Changes reflected in 466B
466B	12/04	Number change to 466.02
466.02	4/05	Changes reflected in 466.03
466.03	9/06	No changes reflected in 466.04
466.04	8/08	Changes reflected in 466.05
466.05	31 Aug 2011	Minor changes to reflect FHI changed to FHI 360
POL 03041	Dec 2012	New POL number for migration to EDMS
POL 03041	April 2014	Added definitions and formatting
POL 03041	Jan 2019	Major – updated language, actions, definitions, format, title change.
POL 03041	29 May 2019	Revised definitions for FHI Personnel, Supplier, and Supplier Personnel, and updated policy content accordingly.
POL 03041	02 MAY 2022	Updated language to match other safeguarding policies. Minor wording changes.
POL 03041	18 JUL 2023	Minor administrative change. Update to section 3.2.3 with titles vs. specific employee names.