VISION ACTION POLICY ON HARASSMENT AND MISCONDUCT

CEO Foreword

At Vision Action, we are committed to creating a safe, respectful and inclusive environment for everyone we work with — our staff, volunteers, partners, and the communities we serve. Harassment and misconduct have no place in our organisation, and we take seriously our responsibility to prevent harm, respond effectively to concerns, and uphold the highest standards of integrity.

This policy sets out the principles and expectations that guide our behaviour, as well as the procedures we follow when issues are reported. It reflects our ongoing commitment to safeguarding, accountability and continuous improvement across all our programmes, both in the UK and internationally.

Thank you for playing your part in ensuring Vision Action remains a workplace and partner organisation where everyone is treated with dignity and feels safe to speak up.

Tiwonge Mwase-Vuma
Co-CEO

Jale Canlibalik
Co-CEO

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VISION ACTION POLICY ON HARASSMENT AND MISCONDUCT

1. Purpose and Scope

Vision Action is committed to maintaining a safe, respectful, and inclusive environment for everyone connected with our work. We do not tolerate harassment, sexual harassment, bullying, abuse, exploitation, intimidation, or any other form of misconduct, and we meet our legal obligations to prevent harm and protect individuals.

While we recognise that cultural norms vary, this policy applies consistently across all contexts and takes precedence where local practices differ.

This policy ensures the protection of staff, trustees, volunteers, partners, contractors, and programme beneficiaries across all Vision Action activities, including digital environments and travel.

2. Definitions

Includes definitions of harassment, sexual harassment, bullying, and misconduct, consistent with UK law and safeguarding standards. See Annex A

3. Expected Standards of Behaviour

All Vision Action representatives must uphold high standards of conduct, integrity, and respect in all interactions, including where behaviour outside of work may impact the organisation, colleagues, or communities.

The following principles apply across this policy:

- Confidentiality
- Sensitivity
- Ownership
- Consultation
- Transparency

All staff are expected to:

- Treat all individuals with dignity, respect, and professionalism
- Maintain appropriate professional boundaries at all times
- Prioritise the health, safety, and wellbeing of others
- Communicate openly and sensitively, including on culturally sensitive matters
- Use physical contact only when necessary, ensuring clear explanation and consent (e.g. eye examinations)
- Avoid being alone with vulnerable individuals where possible, in line with local context
- Report any concerns, allegations, or disclosures promptly
- Comply with applicable laws and avoid behaviour that could harm Vision Action's reputation

These expectations apply across all settings, including work, travel, online activity, and work-related social environments.
See Annex D – Behaviour Protocols & Standards of Work as set out in Vision Action's Harassment and Misconduct **Guidance Document**.

4. Safer Recruitment, Training and Proactive Prevention Measures

Vision Action is legally and ethically required to prevent harassment and misconduct, including by third-parties. In addition, Vision Action ensures these steps are taken by all UK and non-UK employees.

Recruitment and Vetting

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Vision Action embeds safeguarding and misconduct prevention throughout its recruitment practices:

- All job advertisements, role descriptions and volunteer briefs reference Vision Action's Harassment and Misconduct Policy.
- All new staff, volunteers and trustees must sign a commitment to comply with the policy.
- Recruitment processes include scrutiny of employment history, clarification of gaps, and follow-up checks on references.
- Where references cannot be verified, Vision Action may contact previous employers not listed by the candidate.
- Appropriate vetting checks are undertaken (e.g., DBS checks or equivalent overseas police clearances) in line with role requirements.

Training and Awareness

Vision Action ensures all individuals are equipped to understand, prevent and respond to misconduct.

- Induction for all staff, trustees and volunteers includes a briefing on harassment, misconduct and reporting procedures.
- Annual refresher training is provided for Directors and senior staff.
- All staff and volunteers travelling overseas receive a country-specific misconduct briefing.
- All partners receive a copy of this policy and are briefed on expected conduct and reporting responsibilities.

Proactive Prevention Measures

In line with the Worker Protection Act, Vision Action proactively prevents sexual harassment and misconduct by implementing the following *reasonable steps*:

- **Risk assessments:** Regularly assessing the risk of sexual harassment across different work environments, roles, project sites and partner interactions.
- **Cultural and behavioural audits:** Reviewing organisational culture, staff feedback and reporting patterns to identify areas needing action.
- **Clear reporting channels:** Providing accessible reporting routes for staff, volunteers, partners and beneficiaries, including anonymous options where feasible.
- **Policy accessibility:** Ensuring all staff and partners can easily access the policy and understand their responsibilities.
- **Preventative action:** Taking steps to reduce identified risks, including environmental changes, staffing adjustments or enhanced supervision.
- **Continuous improvement:** Reviewing training, risk assessments and briefings based on lessons learned, incident outcomes and changes in legislation.

Vision Action recognises that from October 2026, employers must take all reasonable steps to prevent sexual harassment and will be directly liable for failure to prevent third-party harassment. Vision Action commits to preparing for and complying with this enhanced duty.

Compliance Evidence Requirements

Vision Action will maintain clear, auditable evidence of all preventative measures, including training records, risk assessments, partner controls and reporting access. These requirements are detailed in Annex E: Compliance Evidence Table in Vision Action's Harassment & Misconduct Guidance Document and must be maintained centrally for audit and governance purposes.

5. Country-Specific Briefings

Country Directors must provide written and verbal briefings on local norms, legal contexts, and misconduct-reporting options to all staff and visitors.

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The Chief Executive Officer (in respect to the UK) and the Global Programmes Manager (in respect to all other countries), will monitor and review the effectiveness of the harassment and misconduct policy, briefings and training on a bi-annual basis.

A member of the Senior Management Team will provide verbal briefing to all overseas staff and volunteers travelling to the UK on what constitutes harassment and misconduct in the UK.

Records of all country-specific briefings must be documented and retained in accordance with Vision Action's record-keeping requirements.

6. Reporting Harassment or Misconduct
Vision Action is committed to ensuring that all concerns of harassment or misconduct can be raised safely, promptly, and without fear of retaliation. The welfare and best interests of the individual raising a concern, and any affected persons, must always be prioritised.

Reporting a Concern
Concerns may be reported to a Country Director, the Global Programmes Manager, the Co-CEOs, or a Trustee. Individuals are not required to report through their line manager and may choose whichever route they feel most appropriate. The safeguarding email may also be used to report internally safeguarding@visionaction.org.uk

Reports should ideally be made in writing (e.g. email), but concerns will be accepted through any reasonable communication method. Anonymous or confidential reporting routes may also be used where available.

All staff, volunteers, and representatives have a responsibility to report concerns. Failure to report known or suspected misconduct may result in disciplinary action.

Non-Retaliation
Retaliation against anyone raising a concern in good faith is strictly prohibited and will be treated as a serious disciplinary offence.

Responsibilities of Leaders
Line Managers, Country Directors, the Senior Management Team (including the Co-CEOs), and Trustees are responsible for:

- Ensuring their teams understand how to report concerns;
- Taking all reports seriously; and
- Escalating reports appropriately, ensuring that at least one member of the Senior Management Team is informed.

Legal and Policy Framework
Reporting harassment or misconduct may be both a professional and legal obligation. This policy should be read alongside the **Whistleblowing Policy**.

External advice and reporting can be done through Protect – speak up, stop harm (UK)

From April 2026, reports of sexual harassment may qualify as protected disclosures under the Employment Rights Act, providing legal protection from detriment or dismissal where concerns are raised in good faith.

Awareness and Culture

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Vision Action aims to ensure that all staff, volunteers, partners, and programme participants understand how to raise concerns and feel safe in doing so.

Vision Action will maintain appropriate records demonstrating that reporting routes and whistleblowing protections have been communicated.

7. Response and Investigation

Investigations will be impartial, confidential, trauma-informed, and timely.

Initial Response

- All reports will be acknowledged within 5 working days where possible.
- An initial risk assessment will be undertaken to determine whether immediate safeguarding action is required.

Case Management

- A Case Manager will be appointed to oversee the process.
- An Investigator will be appointed who is independent and appropriately trained.
- The Case Manager, Investigator, and Decision-Maker will be different individuals wherever possible.

Investigation Process

The investigation will normally include:

1. Agreement of terms of reference
2. Interviews with relevant parties
3. Review of relevant documentation or evidence
4. Confidential record-keeping

Investigations will normally be completed within 30 working days, though complex cases may take longer.

Outcome

- A written outcome will be provided to relevant parties, respecting confidentiality.
- Outcomes may include disciplinary action, safeguarding measures, or referral to external authorities.

Appeal

- Individuals subject to formal outcomes have the right to appeal.
- Appeals must be submitted within a defined timeframe (usually 10 working days).
- Appeals will be heard by an independent person not previously involved.

Reporting lines:

- To the Country Director for programme beneficiaries or partners in their country of operation
- To the Country Director about country partners, volunteers, or in the case of the allegation being made about the Country Director, to the Global Programmes Manager
- To either of the Co-CEOs or in the case of the allegation being made about all of those to one of the trustees
- To any one of the trustees or in the case of the allegation being made about the trustees or Chair, to the either of the Co-CEOs
- In exceptional circumstances reports may be made direct to the Charities Commission if all other reporting lines within Vision Action have been exhausted

In reporting and reacting to harassment and misconduct issues the best interests and welfare of the individual should be paramount. Vision Action recognises that it may not always be best placed to ascertain what exactly has taken place – in which case referral to relevant agencies will take place.

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Strengthen record-keeping:
All investigation records must be securely stored and managed in accordance with organisational data protection requirements and Vision Action's record-keeping procedures.

8. Potential Outcomes
Sanctions may include dismissal, termination of contracts, partner withdrawal, or referral to authorities.

If the alleged incident involves a Vision Action employee, volunteer, or trustee, suspension may be considered where necessary to protect individuals, preserve evidence, or ensure the integrity of the investigation. Suspension is a neutral act and will be proportionate to the level of risk. The decision to suspend or remove must be taken by a Co-CEO in consultation with the Board, where required by governance, and is not open to challenge. (Removal from an overseas assignment may mean the volunteer being asked to remain in the hotel whilst clarification is being sought).

If any individual associated with Vision Action is found to have violated the organisation's Harassment or Misconduct Policy or committed acts which are criminal or grossly infringe individual rights, immediate disciplinary action will take place. This may include:

- Employees – disciplinary action or dismissal. (International staff will be repatriated to their country of origin and police reports will be made.)
- Volunteers, trustees, interns – ending the relationship with Vision Action and police reports will be made
- Local partner organisations – withdrawal of funding/support and ending the relationship with Vision Action, police reports will be made
- Consultants/contractors – termination of contract and police reports will be made
- Criminal prosecution

All parties concerned will be notified of Vision Action's processes and the outcome of the investigation in a timely manner (see section 9). The media will be dealt with by the Co-CEOs and/or the Chair of the Board. The Co-CEO will assess reputational risk and brief the Board accordingly.

9. Support for Those Affected
Vision Action will:

- Provide access to emotional and practical support
- Offer signposting to external specialist services where available
- Ensure individuals are kept informed of progress
- Respect the wishes of the individual wherever possible, including where they do not wish to pursue a formal investigation

Survivor-Centred Investigations

- **Safety First:** Ensuring the immediate physical and emotional safety of the survivor.
- **Informed Consent & Choice:** Survivors are empowered to make decisions about their case, including the right to choose whether to report and to withdraw from the investigation at any time.
- **Confidentiality:** Strict measures to protect the identity and information of the survivor throughout the investigation.
- **Support & Referral:** Providing access to holistic care, including medical, psychosocial, and legal support services. (where available)
- **Clear Communication:** Offering regular updates in a language and format the survivor understands, ensuring they are active participants rather than just witnesses.

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10. Monitoring and Review

Vision Action will maintain a centralised compliance record demonstrating all reasonable steps taken to prevent harassment and misconduct. This includes, but is not limited to:

- Policy and governance documentation
- Training and awareness records
- Risk assessments
- Preventative actions
- Reporting system evidence
- Investigation records
- Monitoring and review logs

These requirements are formally defined in Annex E: Compliance Evidence Table in Vision Action's Harassment & Misconduct Guidance document, which serves as the organisation's audit framework for internal governance, funder assurance, and regulatory compliance.

A central compliance folder will be maintained to ensure all required documentation is accessible, complete, and audit-ready.

Monitoring, Assurance and Key Performance Indicators

Vision Action monitors the effectiveness of this policy through a combination of compliance records, assurance activities, and key performance indicators.

The following KPIs will be monitored and reported to senior management and Trustees to support governance, risk management, and continuous improvement:

- % of staff, trustees, and volunteers completing mandatory harassment and misconduct training
- Number of harassment and misconduct concerns reported (by type and severity)
- % of concerns acknowledged within required timeframe
- Time taken to complete investigations
- Number of serious incidents reported to Trustees or the Charity Commission
- % of countries and teams completing required misconduct risk assessments and briefings

These indicators complement the detailed compliance evidence requirements set out in Annex C and will be used to identify trends, inform prevention measures, and strengthen organisational culture.

Policy Documents

Code	Name	Document type	Where to find it
HM01	Harassment & Misconduct Policy	Policy	This document
HM02	Harassment & Misconduct Policy Guidance	Procedure	Sharepoint, HR & Admin

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ANNEX A: FULL DEFINITIONS

These definitions follow the Equality Act 2010 and guidance from ACAS and the Equality and Human Rights Commission (EHRC), as well as the Worker Protection (Amendment of Equality Act 2010) Act 2023 (effective 2024) and general UK employer duties to protect staff health and safety.

Harassment
Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating a person's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment.

The effect of the behaviour is assessed from the perspective of the individual, taking into account all circumstances, including whether it is reasonable for the conduct to have that effect.
Harassment can occur as a single incident or as a pattern of behaviour.

Unwanted conduct may include (non-exhaustive):

- Verbal comments, jokes or "banter"
- Written communication, including emails and messaging
- Social media content or contact
- Visual material (e.g. images, graffiti)
- Gestures, facial expressions or mimicry
- Pranks or practical jokes
- Exclusion or isolation
- Aggressive or physical behaviour towards a person or their property

Sexual Harassment
Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of:

- violating a person's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples include:

- Sexual comments, jokes or remarks
- Unwanted sexual advances or propositions
- Displaying or sharing sexual images
- Intrusive questions about a person's private life
- Sending sexually explicit messages
- Sexual gestures, staring or leering
- Unwanted physical contact

Less Favourable Treatment Following Harassment
This occurs where an individual is treated less favourably because they have either:

- rejected; or
- submitted to

unwanted conduct of a sexual nature or conduct related to sex or gender reassignment.

Bullying
Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates, or causes physical or emotional harm.

Bullying does not need to be related to a protected characteristic and may be a single incident or repeated behaviour.
Examples include:

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- Persistent criticism or unjustified complaints
- Excluding or isolating individuals
- Excessive or unreasonable monitoring of work
- Misuse of authority or power
- Setting unrealistic or unfair expectations

Harassment by Association or Perception
Harassment can occur:

- By association: where someone is treated unfairly because of their connection to a person with a protected characteristic.
- By perception: where someone is treated unfairly because they are perceived to have a protected characteristic, whether or not this is correct.

Victimisation
Victimisation occurs when someone is treated unfairly because they have:

- made a complaint;
- supported a complaint; or
- raised a concern under this policy.

Third-Party Harassment
Third-party harassment occurs when an individual is subjected to harassment by someone who is not part of the organisation (e.g. beneficiaries, partners, suppliers, or members of the public) in connection with their work.
Such behaviour will not be tolerated. All incidents should be reported and will be taken seriously, with appropriate action taken to protect staff and others.

Online and Digital Harassment
Harassment may occur through digital channels, including social media, messaging platforms, or email. Behaviour in online spaces is covered by this policy where it impacts individuals or the organisation.

Note
This list is not exhaustive. Behaviour may still constitute harassment or misconduct even if it is not specifically described above.

ANNEX B: LEGAL AND POLICY FRAMEWORK

Vision Action complies with:

- **Equality Act 2010**
- **Worker Protection (Amendment of Equality Act 2010) Act 2023** — duty to take reasonable steps from 26 October 2024 to prevent sexual harassment, including from third parties.
- Relevant whistleblowing legislation (including the **Public Interest Disclosure Act 1998** and updates effective April 2026), under which disclosures relating to sexual harassment may qualify for protection.
- Forthcoming October 2026 changes — enhanced duty requiring employers to take all reasonable steps to prevent sexual harassment, including third-party harassment.

This policy aligns with **Vision Action's Safeguarding Policy** and commitments on the prevention of Sexual Exploitation, Abuse and Harassment (SEAH).

Vision Action prohibits:

- Sexual exploitation and abuse of beneficiaries or community members

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- Any abuse of power or position for sexual purposes
- Transactional sex or exchange of benefits for sexual activity

All sexual harassment and serious safeguarding concerns will be reported to the Charity Commission under serious incident rules where required. This policy operates alongside applicable local labour, safeguarding and criminal laws in each country of operation.

ANNEX C: POLICY COMPLIANCE

I have received and been briefed on the Vision Action policy on Harassment and Misconduct and fully understand my responsibilities to comply with and promote the Policy.

Signed	
Name	
Position within Vision Action	
Date	

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