

POLICY: PREVENTION OF SEXUAL HARASSMENT AND ABUSE

Approved by: the FRC Board on 11 October 2024

To be updated by: 2027

1. Introduction

This policy applies to all employees, volunteers, beneficiaries and third parties of the Finnish Red Cross. Definitions of sexual harassment and abuse related to the policy are included in the appendix. The policy applies to the organisation's domestic and international operations.

At the Finnish Red Cross, we do not tolerate any form of sexual harassment or abuse. We are committed to ensuring that the Finnish Red Cross is a safe environment for employees, volunteers, beneficiaries and third parties.

Sexual harassment and abuse are violations of the principles and values of the organisation. The Finnish Red Cross strives to prevent sexual harassment and abuse by communicating about these issues and providing training. The organisation responds immediately to allegations and incidents of sexual harassment and abuse that it is made aware of. All employees, volunteers, beneficiaries and third parties have the opportunity to report sexual harassment and abuse, and inappropriate behaviour is dealt with promptly.

Realising the purpose of the organisation requires that all those working and acting within the organisation act in accordance with its values and principles and are aware of their own responsibility in maintaining the trustworthiness of the organisation.

2. Key principles

- a) At the Finnish Red Cross, we do not tolerate any form of sexual harassment or abuse. The Finnish Red Cross is a safe environment for employees, volunteers, beneficiaries and third parties.
- b) We make sure that persons participating in our activities are committed to implementing this policy (including employees, volunteers, partners and service providers).
- c) We have established channels and procedures for reporting and addressing incidents of sexual harassment and abuse. We inform those involved in our activities of these channels and procedures through our communications and training.
- d) If an incident does not require the involvement of authorities, the Finnish Red Cross will investigate the incident with the victim and suspected perpetrator and take appropriate action. Any actions are always taken by the organisation's staff. We adhere to confidentiality in our actions.
- e) We respect the victim's choices. Our actions must in no way aggravate the situation of the victim or weaken their safety or sense of security.
- f) In the event of a criminal offence, the police shall be contacted, bearing in mind the previous point.
- g) We also respect the suspect's right to due process and will not spread any rumours.
- h) We treat all victims of sexual harassment and abuse in a non-discriminatory and fair manner.
- i) We pay particular attention to the need to protect children and cooperate with child welfare professionals. The police will be contacted even in uncertain cases. If necessary, we will notify child welfare services.

3. Procedures

Five principles of action we cannot compromise on

1. Do not expose anyone to sexual harassment or abuse.
2. Always intervene in incidents of sexual harassment or abuse you discover.
3. Do not demand, request or propose sex or sexual acts in exchange for goods, money, services or other aid.
4. Do not engage in sexual activities with a beneficiary.
5. Promote an environment free from sexual harassment and abuse in your activities.
6. Report all incidents and suspicions related to sexual harassment and abuse. [First Whistle Service](#)

4. Risk identification and management

The risk of encountering sexual harassment or abuse exists in all our activities. The risks increase in humanitarian disasters and other exceptional circumstances. The risks are also higher when working with vulnerable people. Situations with a skewed power structure always entail risks.

We plan in advance how to prevent risks in our programmes. We pay particular attention to factors that could increase the risk of sexual harassment and abuse. These include: sex, sexual orientation and gender identity, disability, ethnic origin, religion, social position and age.

When recruiting new employees, we usually require 2–3 references from the top candidates. We always contact the references before the final recruitment decision is made. In addition to this, we check the criminal record extract of long-term international aid delegates as part of the recruitment process. The references and criminal record extract of those applying for IMPACT training are checked before the course.

Where the job integrally involves permanent work alone with minors, the person selected for the job shall be required to submit a criminal record extract before the employment contract is signed. Volunteers working alone with minors must provide a criminal record extract.

Additionally, national partners participating in international operations and programmes are given support for and training on establishing structures to prevent sexual harassment and abuse, as necessary. The proper functionality of the system and investigating and addressing misconduct is primarily the responsibility of the local partner, in accordance with its own regulations, the ethical principles and policies of the Red Cross and local legislation.

Those involved in international operations and programmes are provided with all the relevant policies, guidelines and mandatory training on sexual harassment and abuse (see chapter 13). Upon signing their employment contract, an employee agrees to follow these policies and guidelines according to the instructions of the Finnish Red Cross, National Red Cross and Red Crescent Societies, International Federation or Committee.

5. Reporting incidents

We encourage anyone who has been subjected to sexual harassment or abuse to report it to one of the organisation's employees or, if no employees are involved in the operation, volunteers, through the Finnish Red Cross's whistleblowing channel. If necessary, the incident must be reported to the authorities. Volunteers and employees may always contact the internal auditor for advice.

The Finnish Red Cross contact person in these matters is the internal auditor, who can be notified of the incidents in person or through the whistleblowing channel on the website: [First Whistle Service](#).

International operations and programmes shall have a system through which employees, volunteers and beneficiaries can report misconduct. In cases of misconduct in international operations, reports may be filed through the general whistleblowing channel on the Finnish Red Cross's website or the local partner's, the Federation's or the Committee's anonymous whistleblowing channel. The Finnish Red Cross's programmes are appointed a contact person. The employees, volunteers and beneficiaries in each programme are informed of this person.

Any cases raised are reported to the internal auditor when they come to the attention of the Finnish Red Cross staff.

We take immediate action and ensure that each report is investigated and any conclusions and recommendations of the investigation are implemented.

6. The process for handling allegations of sexual harassment and abuse

A. When the victim is an employee

The process is advanced by a representative of the employer. The representative reports the incident and its processing to the internal auditor with the victim's permission. We encourage the victim to report the incident at least anonymously.

In the event of serious harassment or abuse or a suspected crime, the matter is referred to the internal auditor, with the victim's permission, and the internal auditor decides how to proceed and is responsible for completing the process.

In the event of suspected crime, the victim is encouraged to report the offence to the police.

B. When the victim is a volunteer

The person responsible for the operations shall ensure that the incident is reported and investigated as appropriate. The person responsible for the operations reports the incident and its processing to the internal auditor with the victim's permission. We encourage the victim to report the incident at least anonymously.

In the event of serious harassment or abuse or a suspected crime, the matter is referred to the internal auditor, with the victim's permission, and the internal auditor decides how to proceed and is responsible for completing the process.

In the event of suspected crime, the victim is encouraged to report the offence to the police.

C. When the victim is a beneficiary

The matter shall always be referred to the internal auditor, who will decide how to proceed and will be responsible for completing the process.

In the event of suspected crime, the victim is encouraged to report the offence to the police.

D. When the victim is a child

When the victim or suspect is a child, the employees or volunteers are not allowed to interview the child or evaluate the truthfulness of the allegation. The police will be contacted even in uncertain cases. If necessary, we will notify child welfare services.

In international operations and programmes, the guidelines of the national society and/or the Federation or the Committee are followed. The internal auditor advises the persons concerned on the actions to be taken and the recording of the process until the case is deemed closed and the victim has been provided with adequate support. The victim shall be kept up to date on the progress of the process. If the employer, the volunteer in charge of activities or the internal auditor deems that there has been no harassment, this will be communicated and justified to the people concerned, and any other factors that influenced the situation will be corrected as needed.

7. Victim support

We take a victim-focused approach to our operations. We respect the victim's wishes and make sure their privacy is protected.

If necessary, we will refer victims of sexual harassment and abuse to support providers outside the organisation.

Examples of operators that support victims of sexual harassment and abuse:

- Victim Support Finland <https://www.riku.fi/en/>
- Rape Crisis Centre Tukinainen's online service <https://www.nettitukinainen.fi/>
- MIELI Mental Health Finland's national crisis helpline in Finnish: 09 2525 0111 <https://mieli.fi/fi/tukea-ja-apua/kriisipuhelin-keskusteluapua-numerossa-09-2525-0111>
- If the victim is an employee, it is also possible to turn to occupational healthcare.

8. Possible sanctions

If an employee is guilty of sexual harassment or abuse, the employer can apply the following sanctions in accordance with labour legislation: written warning, termination or cancellation of the employment contract.

In volunteer activities, a volunteer may be given a permanent or temporary ban on volunteering. If necessary, the matter may also be referred to the organisation's conciliation board in accordance with section 57 of the rules of the Finnish Red Cross.

9. Roles and responsibilities

Responsibilities of senior management

- The commitment of senior management is a prerequisite for the prevention of sexual harassment and abuse and the success of actions taken.
- A person in charge is appointed to the management group who is responsible for the implementation, monitoring and resource allocation of this policy.
- Senior management is responsible for ensuring that the organisation has established the necessary practices and provides adequate orientation/training and materials on the subject. It must also ensure that all operators are aware of this information.
- Senior management is also responsible for ensuring that the beneficiaries are informed of the policies and practices of the Finnish Red Cross in relation to sexual harassment and abuse.

Responsibilities of supervisors and people in charge of volunteer activities

- The Occupational Safety and Health Act dictates that a person in a supervisory position has a responsibility to intervene in sexual harassment and abuse. The volunteer responsible for volunteer activities is responsible for intervening in incidents of sexual harassment and abuse pursuant to the policy on volunteer activities. Volunteers and employees may always contact the internal auditor for advice.
- Supervisors are responsible for training new employees and volunteers.
- They have a responsibility to eliminate the harassment when the harassment is brought to their attention.
- Supervisors have a responsibility to intervene in sexual harassment and abuse, at least by bringing the matter to the attention of the internal auditor.
- Supervisors have a duty to ensure that any sexual harassment or abuse ceases.
- The employer is entitled to take appropriate action if an employee of the organisation has not reported suspected harassment upon becoming aware of it.

Responsibilities of every volunteer and employee

- Everyone is responsible for their own actions.
- Everyone has a responsibility to participate in training on the prevention of sexual harassment and abuse.
- Anyone who has not received the necessary orientation or training or is unaware of the procedures is obliged to obtain the necessary information by contacting the supervisor or person in charge of the activities.
- Everyone is responsible for ensuring that volunteers and beneficiaries in their area are aware of this policy and related guidelines and procedures.
- Employees are also responsible for providing support and guidance to volunteers and beneficiaries.
- Everyone has a responsibility to report any sexual harassment or abuse they discover.

Responsibilities of the internal auditor

- The internal auditor is responsible for investigating, monitoring and reporting incidents of sexual harassment and abuse that come to their attention.
- The internal auditor decides on a case-by-case basis how an incident will be investigated and who will be involved and is responsible for ensuring that incidents are fully dealt with.

Responsibilities of HR management

- HR management monitors the number of sexual harassment and abuse incidents among staff at a general level, and any trends in these numbers, and initiates the necessary measures for improvement.
- They keep the instructions and orientation and training materials up to date and make them available to employees and persons organising volunteer activities.
- HR management supports senior management, the internal auditor and supervisors in investigating and settling incidents of sexual harassment and abuse.

10. Reporting and monitoring

Once per year, the internal auditor shall report to the Audit Committee of the organisation on the number of cases brought to their attention and the conclusions of the investigation process, taking

into account the privacy of the individuals involved. In addition to this, the internal auditor reports, at their discretion, individual incidents to the Audit Committee Chair and Secretary General.

Volunteers, beneficiaries and employees are regularly surveyed on any sexual harassment and abuse they may have experienced, and the implementation of the policy is evaluated based on the responses.

11. Tools to improve knowledge and skills

- The policy is available in Finnish, Swedish and English on the website and intranet of the Finnish Red Cross as well as on RedNet.
- Five different posters on the subject can be ordered free of charge from the online shop or they can be printed out through the intranet.
- There is an online course on the subject on the online learning platform.
- The course is mandatory for all employees and trainers, and it is strongly recommended for other key volunteers.

APPENDIX

Definitions

Beneficiary refers to a person seeking or receiving protection or aid from the Finnish Red Cross. This can apply to anyone in any community or country where the Finnish Red Cross operates.

Community-based reporting mechanisms are confidential channels through which anyone can safely report misconduct, including sexual harassment and abuse, and seek help after becoming a victim of sexual harassment or abuse.

Staff refers to any person employed by the Finnish Red Cross in any country as well as any person who works in an operation/activity coordinated by the Finnish Red Cross without an employment relationship, such as consultants, trainees and commission-based workers.

Child refers to any person under the age of 18.

Volunteer refers to persons who are involved in the activities of the Finnish Red Cross but are not in an employment relationship.

Internal instructions refer to the code of conduct of the Finnish Red Cross staff and other guidelines and policies, such as the volunteering policy and ethical guidelines.

Prevention and procedures of sexual harassment and abuse refers to policies, guidelines and measures designed to prevent the Finnish Red Cross staff, volunteers, aid workers (and other Red Cross representatives), beneficiaries or third parties from engaging in any form of sexual harassment or abuse and to instruct people to report any sexual harassment or abuse that they encounter.

Sexual harassment refers to unwanted physical or verbal conduct of a sexual nature. For example, it may manifest as sexually suggestive expressions and gestures; lewd comments and jokes; remarks or questions concerning a person's body, clothing or private life; pornographic material; letters, emails, messages or calls with sexual overtones; physical touching or advances; proposals or demands for sexual intercourse or other sexual activity.

Sexual harassment is criminalised under a narrower definition. For sexual harassment to be a punishable offence, it requires deliberate touching that violates the victim's sexual integrity and self-determination.

Sexual abuse refers to the realised or threatened physical or mental interference of a sexual nature with another person, either by violence, coercion or in an unequal situation. Sexual abuse also includes any accomplished or attempted acquisition of sexual gain based on the other person's vulnerability or the offender's own position of power or trust. This includes, for example, any economic, social or political gain from the sexual abuse of another person. Purchasing sexual services with money, goods or services is also considered to be sexual abuse.

A safe working environment for children and young people means ensuring the personal integrity of minors in every way and protecting the growth, development and well-being of children and young people. As an employer, the organisation has a duty to check the criminal record extracts of employees working with minors. The organisation also has the legal right to request criminal record extracts from volunteers over the age of 15 who regularly work alone instructing minors. More detailed instructions can be found in the Finnish Red Cross guidelines 'Lasten turvallisuuden edistäminen SPR:n vapaaehtoistoiminnassa' (Promoting children's safety in the FRC's volunteer activities).

Third-party operator refers to any employee, aid worker or volunteer who participates in an operation or activities of the Finnish Red Cross but works for another organisation or operates under the authority of some other organisation.

A volunteer in charge of activities is a person who is committed to being responsible for other volunteers and their activities. Volunteers in charge of activities include, for example, branch signatories, branch contact persons, activity group leaders and other responsible persons.

Senior management refers to the Secretary General and the management group at the headquarters, the executive director at the districts, the director and board at the central administration, the branch chair at the branches and the head of operation or field supervisor in international operations.

Other related guidelines

The organisation's code of conduct for elected officials, Code of ethics for volunteers (Eettinen, vastuullinen, ilmastoystävällinen ja turvallinen vapaaehtoistoiminta | RedNet)

Code of ethics for employees (appendix to employment agreement)

[Guidance note on the prevention and elimination of sexual exploitation, abuse and harassment in development cooperation and humanitarian assistance](#)

[IFRC Code of Conduct](#)

[IFRC Policy and PSEA](#)

IFRC [Manual on prevention and response to sexual exploitation and abuse](#)

IFRC Global Safeguarding Action Plan 2022-2025 [ifrc-global-safeguarding-action-plan-2022-2025-en.pdf](#)

Data protection policy (RedNet/policies)