



Background:

Health, Education and Development Society (HEADS), is a non-profit, non-political and non-governmental organization registered in Pakistan under the Societies Act 1860. Since its establishment in 2013, HEADS has been actively engaged in the developmental and humanitarian sectors. The organization is led by a dedicated Board of Governors (BoG), consisting of professionals with diverse educational backgrounds and capabilities. HEADS operate under a comprehensive set of policies designed to ensure transparency, accountability and efficiency in its systems and operations. HEADS Currently registered in the Islamic Republic of Afghanistan, and established an office in the capital city, Kabul.

Throughout its history, HEADS has worked closely with communities and various stakeholders, addressing a wide range of issues, including but not limited to Education, Health, Protection, Livelihoods, Community Infrastructure (CPIs), Shelter and Settlement, Community Development, Institutional Capacity Building, Research, Gender Equality, Legal Counselling, Referral Mechanisms, Social Accountability, Right to Information, and Governance.

In addition to these programmatic areas, HEADS place a strong emphasis on cross-cutting themes, including social mobilization, gender mainstreaming, inclusion, and resilience in all its core programs. These themes reflect the organization's commitment to addressing the holistic needs of communities and promoting sustainable development.

Vision: Every Individual regardless of background or circumstances enjoy equal opportunities and rights with dignity.

Mission: Empowering Communities through strategic investment in human capital and institutional capacity development, raising sustainable development at the grassroots level.

Objectives:

- Support and develop replicable models and strategies for sustainable human resource development through skills development initiatives.
- Network and collaborate with the Govt. Departments, NGO's, CBO's, WOs and international agencies/donors for sustainable development.
- Support initiatives for sustainable community-based gender sensitive development with particular focus on; Human and institutional Development, Natural Resource Management, Drinking Water Supply, Environmental Sanitation, Education, Agriculture, Health & Nutrition, Disaster Management and Micro Credit & Enterprise.
- Create economic and recreational opportunities for youth through skill enhancement programs for peace promotion.
- Enable equitable access to quality education and healthcare, raising holistic community development and well-being.
- Promoting Social Inclusion and Empowerment;
- Strengthen Resilience to Climate Change and Environmental Degradation.
- Advocacy for Peace, Human Rights, and Social Justice.
- Building Disaster Resilience and Preparedness

Introduction

This Anti-Harassment Policy reinforces a commitment to fostering a safe, inclusive, and harassment-free environment. HEADS is committed to ensure a safe, respectful, and harassment-free work environment for all employees, volunteers, beneficiaries, and stakeholders. By implementing strong preventative measures, clear reporting structures, and strict disciplinary actions, this policy establishes a zero-tolerance stance on harassment, sexual exploitation, and abuse while outlining procedures for prevention, reporting, and response in alignment with international best practices.

Purpose

The purpose of this policy is to establish a zero-tolerance approach to all forms of harassment, sexual exploitation, and abuse, define clear reporting mechanisms for victims and witnesses, ensure confidential, fair, and prompt resolution of harassment complaints, prevent retaliation against individuals who report harassment and promote a workplace culture of dignity, equality, inclusion, and respect.

Commitment to a Harassment-Free Environment

HEADS is fully committed to creating a workplace free from harassment and exploitation and will integrate Preventing Sexual Exploitation and Abuse (PSEA), Gender-Based Violence (GBV), and Child Protection into all operations. HEADS adopt the IASC Six Core Principles on the prevention of sexual exploitation and abuse, protection against Harassment at workplace Act 2010, UDHR 1948, ILO Convention 190, 2019, CEDAW, ICCPR. The Inter-Agency Standing Committee (IASC) Six Core Principles are internationally recognized guidelines aimed at preventing sexual exploitation and abuse (PSEA), particularly in humanitarian and development settings. These principles apply to all organizations, staff, and partners engaged in humanitarian work.

Scope

This policy applies to all HEADS employees, volunteers, contractors, partners, beneficiaries, and associated personnel, including job candidates and implementing partners.

Equality and Non-Discrimination

HEADS uphold the principle of equality for all individuals, regardless of age, disability, ethnicity, race, color, national origin, religion, gender identity, marital status, sexual orientation, or medical history. Pregnancy, childbirth, breastfeeding, or related medical conditions. Socioeconomic status or any other characteristic protected under international human rights laws.

Key Definitions

- **Sexual Harassment:** Unwelcome sexual advances, requests for favors, or other verbal/physical conduct of a sexual nature that creates a hostile work environment.

- **Sexual Exploitation:** The abuse of a position of vulnerability for sexual purposes.
- **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal power dynamics.
- **Gender-Based Violence (GBV):** Any harm perpetrated against individuals based on their gender identity or roles.
- **Child Abuse & Exploitation:** Any form of physical, emotional, or sexual harm against children, including neglect or forced labor.

Reporting & Complaint Mechanism

- **Confidential Reporting Channels:** Through emails, letters, Toll-free hotline, In-person reporting to designated officers.
- **Anonymous Reporting:** Individuals may report harassment without revealing their identity.

Structured Investigation Process

Receipt & Acknowledgment of Complaint (*Within 3 Working Days*)

Initial Review & Risk Assessment (*Within 5 Working Days*)

Formation of Investigation Panel (*Within 5 Working Days*)

Evidence Collection & Interviews (*Within 10-15 Working Days*)

Analysis & Decision-Making (*Within 5 Working Days Post-Investigation*)

Corrective Actions & Disciplinary Measures (*Within 5 Working Days Post-Decision*)

Appeals Process (*Within 10 Working Days of Decision*)

Investigation & Disciplinary Action

Harassment Prevention Committee (HPC): HPC will be based on a designated team responsible for handling complaints including the senior management, Compliance officer, Gender and Safeguarding Officer, External legal expert and Psychological support expert as members. The Harassment Prevention Committee will review the complaint to determine the nature of the allegation, immediate risks to the complainant and will overview whether the complaint falls under workplace harassment or criminal offense for referral to legal authorities.

Confidential support: legal, medical, psychosocial for the complainant, whistleblower protection to prevent retaliation. Investigations will be conducted following a structured process with an opportunity to respond to allegations fairly. Statements will be recorded from any third party who observed or have relevant information. The Harassment Prevention Committee will compile the findings, recommendations, and suggest the corrective actions.

Corrective Measures

- **Preponderance of Evidence:** A conclusion is drawn based on available facts.
- **Legal & Policy Frameworks:** Findings must align with provincial and national laws.
- **Harassment Severity & Impact:** Cases categorized into minor, moderate, or severe.

If Harassment is Proven the possible disciplinary actions include:

- Formal warning & mandatory retraining (for minor offenses).
- Demotion, salary deduction, or suspension (for moderate violations).
- Termination of employment or legal action (for severe violations).
- Referral to law enforcement for cases involving sexual exploitation, violence, or criminal behavior.

If Complaint is Unsubstantiated:

- No disciplinary action, but the case remains confidentially recorded.
- The complainant is informed of their right to appeal or seek external legal action.

Survivor Support Measures:

- Counseling & psychosocial support will provide.
- Adjustments in workplace (e.g. transfer, flexible work).
- Assurance of no retaliation and safe work environment and measures to prevent reprisal against whistleblowers and complainants.

Prevention Measures & Vetting

Mandatory background checks for all new hires, contractors, and implementing partners, Zero-tolerance clauses for sexual exploitation and abuse (SEA) included in all contracts, Strict oversight and review of partner organizations to ensure adherence to safeguarding standards.

Management Responsibilities

- **Human Resources (HR):** Responsible for policy implementation, staff training, and enforcement of anti-harassment measures.
- **Compliance & Legal Department:** Ensures adherence to national and international legal standards on harassment.
- **Department Heads & Senior Leadership:** Actively promote a harassment-free workplace and monitor compliance within their respective teams.

Training & Awareness

Mandatory anti-harassment and safeguarding training for all employees, volunteers, and partners, Refresher training programs at regular intervals, Awareness campaigns to ensure all stakeholders understand their rights and responsibilities.

Monitoring, Compliance & Policy Review

- Quarterly assessments to ensure compliance with this policy.
- Annual independent audits to evaluate effectiveness.
- Feedback mechanisms to allow employees and beneficiaries to provide input on harassment prevention measures.
- The policy will be reviewed annually by the Harassment Prevention Committee, with updates reflecting legal developments, feedback, and best practices.