

DISCRIMINATION, HARASSMENT, AND SAFEGUARDING POLICIES

World Learning Inc. is committed to maintaining a work environment for personnel and a learning environment for students and program participants that are free from discrimination and harassment. World Learning Inc. is dedicated to protecting the safety, well-being, and rights of its global staff and students as well as anyone who comes into contact with them. We are committed to complying with the letter and spirit of all laws and donor requirements applicable to our activities, including those concerning sexual misconduct in the workplace and all other forms of sexual and other exploitation and abuse. **World Learning Inc. prohibits any form of discrimination, sexual or other harassment, sexual abuse or exploitation involving adults or children, sex or labor trafficking, forced labor, bullying, coercion, and violence or threats of violence, either inside or outside the workplace.**

These policies apply to all applicants, employees, faculty, board members, independent contractors, fellows, subcontractors, personnel working for our organization who are employed by temporary agencies, volunteers, participants in programs administered by World Learning Inc., and any other persons or firms doing business for or with World Learning.

Consequences for Violations

Any staff or personnel found to have violated the Discrimination, Harassment, and Safeguarding Policies may be subject to disciplinary action, up to and including termination, and if terminated will not be eligible for re-hire. World Learning may also disclose the reasons for termination in response to inquiries from prospective employers, consistent with applicable law.

Discrimination and Harassment Prohibited

All personnel are entitled to a workplace free of discrimination. Harassment based on any of the factors below is prohibited and will not be tolerated in the workplace. Harassment of anyone, on the basis of any legally protected classification may be unlawful and is a violation of World Learning's policy. Offenders are subject to disciplinary action up to and including immediate termination. If personnel believe that they have been subjected to such discrimination or harassment, the reporting procedure outlined below should be followed.

Harassment consists of unwelcome conduct — whether verbal, nonverbal, physical, visual, or material (gifts) — that is based upon a person's protected status, such as race, color, religion, sex, gender identity, sexual orientation, pregnancy, age, national origin, place of birth, HIV-positive status, physical or mental disability, military or veteran status, genetic information, or any other protected classification. The organization will not tolerate harassing conduct that affects tangible job benefits; interferes unreasonably with an individual's work performance; or creates an intimidating, hostile, or offensive working environment. Such harassment may include, for example, jokes about another person's protected status, kidding, teasing, or practical jokes directed at a person based on a protected status. The prohibited conduct also includes the following:

- Epithets, slurs, negative stereotyping, or intimidating acts that are based on protected status.
- Written or graphic material circulated within or posted within the workplace that shows hostility toward a protected status.
- Microaggressions: casual verbal, nonverbal, and environmental slights, snubs, or insults, whether intentional or unintentional, that communicate hostile, derogatory, or negative messages to persons

based solely upon their protected status. Repeated microaggressions can lead to an unsafe or hostile workplace environment. (Examples include women being told to smile, take notes, or make coffee as well as comments on someone's hair or appearance.)

- Power, context, and perception matters.
 - Visible power is where everyone generally knows that one individual or entity has the ability to make decisions that affect another (e.g., organizational hierarchy, manager/employee, teacher/student, control of funding and resource allocation)
 - Invisible power is based on norms, beliefs, socialization, and ideology that we internalize and may not be aware of (gender expectations, unconscious bias)
 - Context matters include gifts such as flowers, which have a historical context as being romantic.
 - Perception matters occur when intentions do not equal impact. Could the colleague or other witnesses interpret an action as inappropriate or creating a hostile work environment?

Bullying is defined as repeated, health-harming mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes:

- Threatening, humiliating, and/or intimidating behaviors;
- Work interference/sabotage that prevents work from getting done; and/or
- Verbal abuse.

Such behavior violates our Code of Ethics, which clearly states that all employees will be treated with dignity and respect.

The following types of behavior are examples of bullying:

- Verbal bullying: Slandering, disparaging colleagues, ridiculing, or maligning a person or their family; persistent name-calling that is hurtful, insulting, or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- Physical bullying: Pushing, shoving, kicking, poking, tripping, assaulting or making a threat of physical assault, damaging a person's work area or property.
- Gesture bullying: Nonverbal gestures that can convey threatening messages.
- Exclusion: Socially or physically excluding or disregarding a person in work-related activities.

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person.
- Shouting or raising one's voice at an individual in public or in private.
- Using obscene or intimidating gestures.
- Not allowing the person to speak or express himself or herself (e.g., ignoring or interrupting).
- Personal insults and use of offensive nicknames.
- Public humiliation in any form.
- Constant criticism on matters unrelated or minimally related to the person's job performance or description.
- Public reprimands.
- Repeatedly accusing someone of errors that cannot be documented.
- Deliberately interfering with mail and/or other communications.
- Spreading rumors and gossip regarding individuals.

- Encouraging others to disregard a supervisor's instructions.
- Manipulating the ability of someone to do their work (e.g., overloading, underloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions).
- Assigning menial tasks not in keeping with the normal responsibilities of the job.
- Taking credit for another person's ideas.
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave.
- Deliberately excluding an individual or isolating them from work-related activities, such as meetings.
- Unwanted physical contact, physical abuse, or threats of abuse to an individual or an individual's property (e.g., defacing or marking up property).

Sexual harassment is conduct based on sex — whether directed toward a person of another or the same sex — and may include explicit discussions or descriptions of sexual positions, sexual innuendo, suggestive comments, sexually oriented kidding, teasing, practical jokes or jokes about obscene printed or visual material, and physical contact such as patting, pinching, or brushing up against another person's body.

- Unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct based on sex, such as the following:
 - Submission to the conduct is an explicit or implicit term or condition of employment (quid pro quo).
 - Submission to or rejection of the conduct is used as the basis for an employment decision.
 - The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

A **hostile environment** is created when sexual harassment is:

- sufficiently severe; and/or
- persistent or pervasive and objectively offensive.

Examples of sexual harassment include, but are not limited to, the following, when such acts or behavior involves one of the previously identified criteria:

- Touching or grabbing a sexual part of an individual's body;
- Touching or grabbing any part of an individual's body after that person has indicated, or it is known or should be known, that such physical contact is unwelcome;
- Continuing to ask an individual to socialize on- or off-duty when that person has indicated they are not interested;
- Displaying or transmitting sexually suggestive images, pictures, objects, cartoons, or posters;
- Writing sexually suggestive notes or letters;
- Referring to or calling a person a sexualized name;
- Telling jokes of a sexual nature, gossiping, or using sexually vulgar or explicit language;
- Making derogatory or provoking remarks about or relating to an individual's sex or sexual orientation;
- Engaging in implicit or explicit coercive sexual behavior that is used to control, influence, or affect the employment conditions and/or work environment of another employee;
- Engaging in unwelcome leering, whistling, sexual gestures, or other inappropriate conduct, including requests or demands for sex or sexual favors;
- Sending sexually explicit voicemails, emails, texts, or other forms of electronic messaging;

- Engaging in harassing acts or behavior directed against a person on the basis of their sex or sexual orientation; and
- Engaging in off-duty conduct that falls within the above definition and affects the work or learning environment.

The preceding list is not exhaustive. Any form of sexual or other forms of harassment toward an employee or other staff member is unacceptable at any time and in any location. This includes, but is not limited to, conduct in the workplace, in any work-related settings such as business trips and business-related social functions, and after-work socializing, regardless of whether the conduct is engaged in by a supervisor, co-worker, board member, client, customer, consultant, vendor, volunteer, or other outside party. Employees must avoid situations that present the inherent potential for sexual harassment, discrimination, or retaliation, including personal relationships between a supervisor or manager and an employee he/she supervises or evaluates. Employees who become involved in intimate or romantic involvements with someone they supervise, whether directly or indirectly, must disclose this immediately to Human Resources, which may take steps to mitigate any potential compromises of World Learning's policies. Employees are encouraged to consider also avoiding social situations involving excessive alcohol or other substances that may impair judgment.

Workplace Violence

World Learning is committed to maintaining a safe work environment in all its offices and preventing workplace violence. We have adopted the following guidelines regarding threats of, or actual, violence involving employees on the premises or during work performed off site by or for the organization.

All employees, including managers, as well as volunteers and temporary employees, board members, consultants, vendors, customers, and visitors should always be treated with courtesy and respect. Employees are expected to refrain from fighting, engaging in "horseplay," using threatening or menacing words or actions, or demonstrating any other conduct that may be frightening, intimidating, coercive, or considered dangerous or threatening to others.

Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited from the premises of any World Learning worksite, except where specifically authorized for security purposes.

Conduct by employees that verbally or physically threatens, intimidates, frightens or coerces another employee, board member, consultant, volunteer, vendor, customer, or member of the public or violates any other aspect of this policy at any time, including off-duty periods with other employees and at company-sponsored functions, will not be tolerated. Anyone found to be responsible for any such prohibited behavior will be subject to prompt disciplinary action up to and including termination.

All threats of, or actual, violence, both direct and indirect, or any intimidating, frightening, or coercive behavior should be reported as soon as possible as directed in the reporting procedures in these policies. This includes threats by employees, board members, customers, vendors, solicitors, contractors, or other members of the public. When reporting a threat of violence or any other intimidating, frightening, or coercive behavior, you should be as specific and detailed as possible.

All suspicious individuals or activities should also be reported as soon as possible to a supervisor. Employees should not place themselves in peril.

World Learning will promptly and thoroughly investigate all reports of threats of, or actual, violence and any suspicious individuals or activities. The identity of the individual making a report will be protected to the extent possible. To maintain workplace safety and the integrity of its investigation, World Learning may suspend employees, either with or without pay, pending investigation.

World Learning encourages employees to bring their disputes or differences with other employees to the attention of their supervisor, the Human Resources Department, or a member of the management team before the situation escalates into potential violence. World Learning is eager to assist in the resolution of employee disputes and will not discipline employees for raising such concerns as directed in the reporting procedures in these policies.

Reporting Harassment, Bullying, Safeguarding, or Workplace Violence

World Learning personnel who become aware of or have concerns about, possible violations of any part of the Discrimination, Harassment, or Safeguarding Policy involving themselves, other employees, or anyone who has come into contact with personnel, regardless of the level of seriousness, **MUST report immediately as follows:**

Any threats of imminent physical danger should be reported immediately by calling 911 or local authorities. All U.S. or internationally based individuals who believe they are victim of sexual harassment or have witnessed harassment should report it promptly to the Vice President of Human Resources and Administration at (802) 258-3117 or email anne.brnnger@worldlearning.org, located at 1 Kipling Road, Brattleboro, VT; to the Senior Vice President of Legal Affairs at (802) 258-3490 or email Lisa.Rae@worldlearning.org, located in the Boyce House on the Brattleboro campus; or via Lighthouse, our confidential reporting system:

- Website: www.lighthouse-services.com/worldlearning
- Telephone: English speaking USA and Canada: (833) 400-0039 (direct dial); all other countries: (800) 603-2869 (dial country access code first)
- E-mail: reports@lighthouse-services.com (must include World Learning's name on report)
- Fax: (215) 689-3885 (must include World Learning's name on report)

World Learning encourages all individuals to report harassment to World Learning according to the above reporting procedures. In addition, individuals may also file a complaint by writing to or calling any of the following state or federal agencies:

- **For Vermont-based personnel:** Vermont Attorney General's Office, Civil Rights Unit, 109 State Street, Montpelier, VT 05609; (802) 828-3171 (voice/TDD).
- **For DC-based personnel:** District of Columbia Office of Human Rights, 441 4th Street, NW, Suite 570N, Washington, DC 20001; (202) 727-3400.
- **For US-based personnel:** Equal Employment Opportunity Commission, 131 M Street, NE, Washington, DC 20507; (800) 669-4000; (800) 669-6820 (TTY for Deaf/Hard of Hearing callers only), (844) 234-5122 (ASL Video Phone for Deaf/Hard of Hearing callers only); info@eeoc.gov
- **For international/locally hired personnel:** Please contact your local HR office or HR@worldlearning.org for alternatives to filing a complaint directly with World Learning Human Resources or Lighthouse.

There is no time limit on how long after an incident you can make a report of misconduct; however, World Learning's ability to respond to a report may be hindered by the length of time between the alleged misconduct and the report.

World Learning will help the parties involved access appropriate medical and/or mental health services, discuss possible interim arrangements during the investigation process, and answer questions along the way.

If an individual who makes a report insists that their name or other identifiable information not be revealed and World Learning is able to respect that request, the individual must understand that World Learning will be unable to conduct an investigation into the particular incident or pursue disciplinary action against the alleged perpetrator.

Investigations

Allegations of harassment will be investigated promptly. World Learning will make all reasonable efforts to maintain confidentiality and respect the privacy of those involved and will only share information as is needed to conduct a prompt, thorough, and effective investigation. World Learning will only share information as is needed to conduct a prompt, thorough, and effective investigation. Even if the reporting party asks that World Learning not pursue an investigation or decides to attempt to resolve the situation informally, World Learning may still investigate the allegations and address the conduct as may be warranted under the circumstances.

Once World Learning is informed of alleged misconduct, World Learning will work with the relevant parties on next steps. World Learning will always reach out to the reporting party to gather more information and provide support. All reports of alleged misconduct will be investigated thoroughly, impartially, and promptly whether reports of such misconduct are made formally or informally. World Learning will facilitate the implementation of measures to stop the behavior and take steps to prevent its recurrence.

When the investigation is completed, the individual filing the complaint and the accused harasser will be informed of the outcome of the investigation. If an investigation determines that harassment has taken place, World Learning will take appropriate corrective action to stop the behavior and take steps to prevent its recurrence, including disciplinary action against the harasser, up to and including termination or dismissal.

World Learning will report violations of these policies as required under applicable donor and government rules. Depending on the type of conduct and the parties involved, World Learning may contact local law enforcement. World Learning will continue its own investigation into the alleged conduct, regardless of whether the police decide to pursue an investigation. World Learning will cooperate with all police investigations and will honor and enforce any judicial no-contact, restraining, or protective orders the parties may obtain outside the World Learning process.

Frivolous, malicious, or false claims of harassment will not be tolerated and could result in disciplinary action up to and including termination or dismissal.

Retaliation Prohibited

World Learning prohibits retaliation against anyone who files a good faith complaint of harassment, assists in making a harassment complaint, or cooperates in the investigation of a complaint of harassment.

Any attempt by a member of the World Learning community to intimidate, penalize, or threaten a person who reports or is otherwise involved or cooperating in a report of discrimination, misconduct, or harassment is strictly prohibited. Retaliation can include ostracizing the person, pressuring the person to drop or not support the complaint, or adversely altering that person's duties or work or learning environment. Any person found to have participated in an act of retaliation will be disciplined accordingly.

If you feel you have been retaliated against, please notify Human Resources, your department head, or your supervisor.

Consensual Relationships

Between Employees and Students or Program Participants

World Learning prohibits consensual romantic and/or sexual relationships between employees (as defined below) and students or program participants.

For the purpose of this policy, "employees" means members of the faculty, which includes SIT Study Abroad faculty and SIT Graduate Institute Faculty in any category as well as any other World Learning staff in a position to control or confer on particular students or program participants an educational, economic, or extracurricular benefit and/or advantage.

This policy remains in effect after the student leaves the program, and subsequent consensual relationships between program staff and former students are also viewed as inappropriate unless five years have passed between their participation in the program.

Between Supervisors and Supervised Employees

World Learning prohibits consensual romantic relationships between supervisors and supervised employees.

For the purposes of this policy, a supervisor is any person in a position to hire, retain, make employment or compensation decisions, or control the work of the employee involved. A supervised employee is any person who is responsible to the supervisor directly or indirectly through the chain of command.

In the event that an employee is offered a position that will require supervision of a person with whom the employee has a consensual relationship, the employee/prospective supervisor must disclose the relationship to the Vice President of Human Resources and Administration. Employees who apply for supervisory positions must disclose at the time that they submit their applications any current consensual relationships with persons who would be under their supervision if the employees were to be selected for the post.

Engaging in a consensual relationship prohibited under this policy or failing to make disclosures when required by this policy may cause World Learning to take appropriate action, including discipline of the supervising employee, up to and including termination of employment.

Sexual Exploitation and Abuse

Sexual exploitation and abuse violate universally recognized international legal norms and standards. World Learning is committed to ensuring that its staff, including employees and consultants, and sub-recipients and their staff refrain from acts of sexual exploitation and/or abuse. World Learning does not tolerate any form of sexual exploitation or abuse under any circumstance. Employees and other personnel will be strictly held to the following standards of conduct toward program beneficiaries and participants and anyone else they come into contact with at any time or in any location, whether on the job or otherwise:

- Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.
- The exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior, is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Sexual relationships between staff and beneficiaries of assistance, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of our organization and are strongly discouraged.
- When a staff member develops concerns or suspicions regarding sexual exploitation or sexual abuse of participants, beneficiaries, donors, or anybody associated with the program the staff member must report such concerns in accordance with the procedures outlined in the section [Reporting Section](#). This required duty to report remains regardless of who is the perpetrator of the abuse or exploitation, whether the perpetrator is a colleague in the same group, practice, office, or country or someone outside of World Learning, including representatives of donors and partners.
- Staff are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a responsibility to support and develop systems that maintain this environment.

The standards set out above are not intended to be an exhaustive list. Other types of sexually exploitive or sexually abusive behavior may be grounds for administrative action or disciplinary measures, including summary dismissal, pursuant to organizational policies, procedures, and practices.

World Learning may refrain from applying the standard described in this section where a staff member is legally married to someone under the age of 18 but over the age of majority or consent in their country of citizenship.

Trafficking in Persons and Forced Labor

World Learning employees and other staff are prohibited from engaging in any of the activities listed and defined below, either on or off the job:

1. **Trafficking in Persons** – The recruitment, transportation, transfer, harboring, or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, or giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation,

regardless of whether the victim provides consent. Exploitation includes, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude, or the removal or organs.

2. **Procurement of a commercial sex act** – Visiting, paying, or engaging prostitutes or arranging for others to do so.
3. **Use of forced labor** in the performance of a donor-funded award or otherwise.
4. **Acts that directly support or advance trafficking in persons**, including the following:
 - Destroying, concealing, confiscating, or otherwise denying an employee access to their identity or immigration documents, such as passports or driver’s licenses;
 - Failing to provide or pay for return transportation costs at the end of employment to a country outside the U.S. from which an employee was recruited unless there is an applicable exemption, the employee is legally permitted to remain in the country of employment and voluntarily chooses to do so, or the employee is a victim of human trafficking seeking victim services or legal redress or a witness in a human trafficking enforcement action in the country of employment.
 - Soliciting for or offering employment by means of misleading, false, or fraudulent pretenses, representations, or promises.
 - Charging employees recruitment fees or using recruiters that do not comply with labor laws in the country of recruitment.
 - Providing or arranging housing that fails to meet the host country’s housing and safety standards.

For U.S. government awards, World Learning implements this policy in accordance with its [Anti-Trafficking Compliance Plan](#).

Child Safeguarding

Because World Learning programs may involve situations in which personnel come into contact with children and minors, World Learning has adopted core child safeguarding principles. Definitions of terms appear under the principles. These principles and definitions apply to all personnel at all times and locations, whether on or off the job:

1. All staff and other personnel must comply at all times with host country and local child welfare and protection legislation or international standards, whichever gives greater protection, and U.S. law where applicable.
2. Engaging in any form of child abuse, exploitation, or neglect is absolutely prohibited.
3. All project planning and implementation must consider child safeguarding to determine potential risks to children associated with project activities and operations.
4. Staff must apply measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to: (i) limiting unsupervised interactions with children; (ii) prohibiting exposure to pornography; and (iii) complying with applicable laws, regulations, and customs regarding photographing, filming, or other image-generating activities involving children.
5. World Learning will promote child-safe screening procedures for personnel, particularly personnel whose work brings them into direct contact with children.
6. All staff and other personnel working with the organization will be trained to recognize child abuse, exploitation, and neglect and will be required to report any allegations of such conduct.

- World Learning personnel who become aware of or have concerns about possible violations of any part of the Safeguarding Policy, including any suspected abuse, harassment, or inappropriate conduct toward minors, regardless of the level of seriousness, have the responsibility to alert and report it immediately following the guidelines provided in [reporting section](#) of this manual. This required duty to report remains regardless of who the perpetrator of the abuse or exploitation is and whether the perpetrator is a colleague in the same group, practice, office, or country or someone outside of World Learning, including representatives of donors and partners.

Additional Responsibilities of Participants

Staff are obliged to create and maintain an environment for beneficiaries that is safe and free from harassment and sexual exploitation and abuse. Managers at all levels have a responsibility to support and develop systems that maintain this environment, including:

- Establishing procedures for staff to appropriately respond to incidents or reports involving participants and any of the misconduct described in this policy; and
- Communicating information and instructions that enable participants and beneficiaries to report misconduct or suspicions or concerns regarding harassment, sexual exploitation and abuse, trafficking, child safeguarding, or other concerns.

Communication

If you have any questions about World Learning's harassment policy, please reach out to Human Resources at HR@worldlearning.org.

Definitions of Prohibited Acts

Nonconsensual Sexual Contact

Nonconsensual sexual contact is defined as any intentional sexual touching, however slight, with any body part or object by a person upon another person that is without consent and/or by force.

Examples of sexual contact include but are not limited to: intentional contact with the breasts, buttocks, groin, or genitals; touching another with any of these body parts or making another touch you or themselves with or on any of these body parts; or any other intentional bodily contact in a sexual manner.

Nonconsensual Sexual Intercourse

Nonconsensual sexual intercourse is defined as any sexual intercourse, however slight, with any body part or object by a person upon another person that is without consent and/or by force.

Examples of sexual intercourse include but are not limited to: vaginal or anal penetration by a penis, finger, tongue, or object and oral copulation (mouth to genital contact), no matter how slight the penetration or contact.

Sexual Exploitation

Sexual exploitation occurs when one person takes nonconsensual or abusive sexual advantage of another for his/her own advantage or benefit, or to benefit or advantage anyone other than the one being exploited, and that behavior does not otherwise constitute one of the other sexual misconduct offenses.

Examples of sexual exploitation include but are not limited to: invading another's sexual privacy; prostituting another person; conducting or participating in the nonconsensual digital, video, or audio recording of nudity or sexual activity; unauthorized sharing or distributing digital, video, or audio recording of nudity or sexual activity; engaging in voyeurism; going beyond the boundaries of consent (such as letting one's friend hide in the closet to watch one having consensual sex); knowingly exposing someone to or transmitting an STI, STD, or HIV to another person; intentionally or recklessly exposing one's genitals in nonconsensual circumstances; or inducing another to expose their genitals.

Domestic Violence

Domestic violence may include violent acts by a current or former spouse; by a person with whom the victim shares a child in common; by a person who is cohabitating or has cohabitated with the victim as a spouse; by a person similarly situated to a spouse; between a parent and child; between members of the same household in an intimate relationship; or by any other person similarly situated. Domestic violence can be physical, sexual, emotional, or economic in nature.

Dating Violence

Dating violence can be violence or abusive behavior used by one partner to gain or maintain control over another partner. It can be violence committed by a person who is or has been in a social, romantic, or intimate relationship with the victim. The existence of such a relationship will be determined by factors such as the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved.

Stalking

Stalking is a series of unwanted or obsessive attention, behaviors, or actions toward a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or to suffer substantial emotional distress. Stalking may involve following, lying in wait for, or harassing a person by demonstrating a pattern of conduct composed of two or more acts evidencing a continuity of purpose. Stalking may include the monitoring of an individual online or involve the use of social media, email, or other technology. It may also include unwanted observation or surveillance.

General Definitions***Consent***

Consent is defined as willingly giving permission or agreement to a particular sexual activity or behavior, without coercion, fear, or threat of harm or other unwanted consequences. Consent is an informed, voluntary agreement to participate in a specific act. Consent is communicated either by words or clear, unambiguous actions that are not achieved through manipulation, intimidation, fear, or other acts that a reasonable person would construe as coercion. Consent cannot be given by one who is mentally or physically incapable of giving clear consent at the time of the sexual activity. It is the responsibility of any person who wants to engage in a sexual activity with another person to ensure that they have the

affirmative, expressed, and unequivocal consent of that other person to engage in the particular sexual activity. Silence, lack of protest, or lack of resistance does not mean consent. The existence of a dating relationship between the persons involved or the fact of a past sexual relationship is not a sufficient basis to assume consent. Consent is present only where an individual is fully conscious and is not incapacitated due to physical challenge and/or helplessness or due to alcohol or other substances.

Reporting party

The reporting party is a person who alleges that they are the victim of a violation of this policy.

Respondent

The respondent is a person who has been accused of an alleged violation of the policy.

Safe Bystander Interventions

Observers of a sexual assault or other types of gender- or intimate partner-based misconduct, such as domestic violence, dating violence, or stalking, may be able to help the victim. However, it is important that you do so in a positive manner and in a way that keeps you and the victim safe. Appropriate interventions will depend on the situation. Safe and appropriate options for bystanders may include calling the police to report violent or potentially violent situations, intervening if you believe someone is in a potentially uncomfortable or unsafe situation, and/or encouraging the target of such conduct to report the incident and seek support.

Child or Minor

A child is any person who has not reached the age of 18, regardless of the local age of majority or consent or mistaken belief in the age of the child.

Child Abuse, Exploitation, or Neglect

Child abuse, exploitation, or neglect consists of anything that individuals, institutions, or processes may do or fail to do that directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. The main categories of abuse are defined by WHO as physical abuse, emotional abuse, neglect and negligent treatment, sexual abuse, and/or exploitation.

Physical Abuse

Physical abuse involves the use of physical force (intentional or not) to cause actual or likely physical injury or suffering (e.g., hitting, slapping, using a stick, shaking, pinching, or kneeling for an extended time).

Sexual Abuse of a Child or Minor

Sexual abuse of a child or minor includes all forms of sexual violence. This includes but is not restricted to incest, early and forced marriage, rape, involvement in pornography, and sexual slavery. Child sexual abuse may also include indecent touching or exposure, using sexually explicit language toward a child, or showing children pornographic material.

Emotional Abuse or Psychological Abuse of a Child or Minor

Emotional abuse or psychological abuse of a child or minor includes humiliating and degrading treatment, such as name calling/insulting, constant criticism, belittling, persistent shaming, solitary confinement, and isolation (e.g., locking up a child in a room).

Sexual Exploitation

Sexual exploitation refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual exploitation of another.

World Learning considers that:

- sexual activity with a child with or without their consent is child abuse and a crime; and
- consensual sexual activity with a child over the legal age of consent of the country in which she/he lives and/or in which the offense occurs, but below 18 years of age (although not a crime), will be dealt with as a breach of this Safeguarding Policy and the Code of Conduct.

Exploitation

Exploitation refers to the use of a child in work and other activities for the financial, social, or political benefit of others. This includes but is not limited to child labor, domestic labor, trafficking, child prostitution, or the recruitment of children into an army. It covers situations that interfere with the child's education or that are harmful to the child's health or physical, moral, or social development.