

DTDA's Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

1. Policy statement

DTDA does not tolerate sexual exploitation, abuse or harassment in any form or context. Any person employed by or representing DTDA who is found to have sexually exploited, abused or harassed another person will face disciplinary action.

DTDA commits to:

- Providing a safe working environment for all its employees, free from sexual exploitation, abuse and harassment of any kind.
- Enforcing zero-tolerance towards any form of sexual exploitation, abuse or harassment committed by any DTDA employee or representative or by any DTDA partner.
- Maintaining a reporting system that DTDA employees and representatives but also partners and other stakeholders consider safe to use.
- Ensuring prompt and effective follow-up on all reports about sexual exploitation, abuse or harassment, regardless of the context and the persons involved.
- Appointing a PSEAH focal point and applying a survivor-centred approach to dealing with cases of sexual exploitation, abuse and harassment.
- Cascading to partners the requirement for having a policy on prevention of sexual exploitation, abuse and harassment in place as well as a reporting system.
- Making all employees, consultants, partners and others aware of the present policy and the options for reporting instances of sexual exploitation, abuse or harassment.

DTDA contributes to the creation of fair democratic, social and economic conditions for all in developing countries through the development of sustainable labour markets with social dialogue, tripartite institutions and a democratic and well-functioning trade union movement. The contribution is executed through programme engagement in a number of countries worldwide and is based on long-term partnerships with trade union federations and national trade union centres in these countries. These partnerships implicate interaction, primarily with the principal officers, and programme staff, and to a lesser extent with shop stewards and members from the national trade union centres and their affiliated organisations.

This policy is applicable to anyone working for or with DTDA, and DTDA shall ensure that all persons, organisations and companies with whom collaboration is established are made aware of this policy and accepts their responsibilities hereunder. DTDA shall further ensure that adequate preventive and remedial measures are in place to enforce the policy, and that ongoing monitoring of the application of the policy is carried out.

2. Definitions of sexual exploitation, abuse and harassment

DTDA is using the following definitions with reference to UN definitions and definitions in Danish Legislation:

Sexual exploitation is defined as any actual or attempted abuse of 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 person. Some examples of sexual exploitation include, but is not limited to:

- Utilising employment position or power relation to make another person vulnerable to non-consensual sexual activity.
- Requests for sexual favours in return for professional advancement.
- Prostituting another person.

Sexual abuse is defined as actual or threatened physical intrusion of a sexual nature, whether by force, or under unequal or coercive conditions. Sexual abuse includes, but is not limited to:

- Non-consensual sexual activity of any kind.
- Knowingly/intentionally exposing another person to a sexually transmitted disease or virus without that person's knowledge.
- Unwelcome sexual contact, advances or sexual abuse of any kind.

Sexual harassment is defined as any form of unwanted verbal, non-verbal or physical behaviour with sexual undertones being displayed in relation to a person's sexual status for the purpose of violating that person's dignity, in particular by creating a threatening, hostile, degrading, humiliating and unpleasant climate. Sexual harassment can take many forms, which include, but is not limited to:

- Non-consensual streaming of images, photography, video, or audio recording of sexual activity or nudity, or distribution of such without the knowledge and consent of all parties involved.
- Sexual comments about a person's clothing, anatomy, or looks.
- Unwelcome sexual references, sexual teasing or gestures.
- Spreading rumours about a person's sex life

3. Preventive measures

DTDA shall implement measures to prevent that sexual exploitation, abuse and harassment is being committed by DTDA employees or representatives, whether against colleagues, partner representatives or any other individuals with whom they come into contact through their work. Similarly, DTDA shall ensure that all partner organisations have (or develop) a relevant policy on prevention of sexual exploitation, abuse and harassment, including a system for reporting of cases.

3.1 Preventive measures in the workplaces of DTDA

In order to prevent sexual exploitation, abuse and harassment within the workplaces of DTDA, all employees will be made aware of, and must read and commit to, the present policy, as it constitutes an integral and compulsory part of all individual contracts.

Furthermore, all employees and consultants must sign onto DTDA's Code of Conduct, which includes a specific provision on prevention of sexual exploitation, abuse and harassment and makes explicit reference to the present policy.

Through relevant training, staff conferences etc., DTDA shall ensure that staff awareness about DTDA's zero-tolerance policy and the options for reporting instances of sexual exploitation, abuse or harassment is being maintained at all times, especially since DTDA considers an effective reporting system that is trusted by its would-be users to be a key preventive factor in itself.

In connection with DTDA's periodic workplace assessments, employees will routinely be asked if they have experienced or observed any instances of sexual exploitation, abuse or harassment, and relevant follow-up will be ensured if there should be affirmative responses.

DTDA shall appoint a PSEAH focal point who will receive relevant training in the prevention and management of sexual exploitation, abuse and harassment cases, and who will form part of the multi-option reporting and response system described further below.

3.2. Preventive measures at partner level

All DTDA's partners will be made aware of, and must commit to, the present policy, as it constitutes an integral and compulsory part of all partner agreements. Moreover, all partner agreements (as well as all contracts with consultants and major suppliers) involving funding from the Danish Ministry of Foreign Affairs must include the following provision (verbatim):

"The Danish MoFA has a zero tolerance for inaction approach to tackling sexual exploitation, abuse and harassment (SEAH) as defined in UNSG Bulletin ST/SGB/2003/13 and the definition of sexual harassment in UNGA Resolution A/RES/73/148. The Implementing Partner, and its sub-grantees, will take appropriate measures to protect people, including beneficiaries and staff, from SEAH conducted by its employees and associated personnel including any sub-grantee staff and take timely and appropriate action when reports of SEAH arise. In the event that the Implementing Partner receives reports of allegations of SEAH, the Implementing Partner will take timely and appropriate action to investigate the allegation and, where warranted, take disciplinary measures or civil and/or criminal action. Any violation will be ground for immediate termination of the cooperation between the MFA and the organisation."

In connection with DTDA's partner selection processes, a formal partnership assessment must always be conducted as part of the due diligence and in accordance with the instructions in the applicable DTDA guidelines. Depending on the outcome of each partnership assessment, DTDA shall, as necessary, see to it that relevant capacity building is carried out with an eye to ensuring

that relevant procedures on prevention of sexual exploitation, abuse and harassment are implemented by each partner, as well as a system for reporting cases.

In connection with its financial monitoring visits, DTDA shall routinely ensure that all partners are aware of this policy, including the options for reporting, and that they make sure to cascade the requirements herein to their respective sub-grantees and other relevant parties, as applicable.

DTDA shall further ensure that all partners provide effective communication about the options for reporting cases of sexual exploitation, abuse or harassment to the various groups of rights-holders who take part in the programme activities implemented with DTDA funds. It shall also be ensured that the options for reporting directly to DTDA are effectively communicated.

4. Remedial measures

DTDA shall ensure that a safe and responsive reporting system is in place and treat all reported incidents of sexual exploitation, abuse or harassment seriously and with confidentiality. In each case, DTDA shall apply a survivor-centred approach and immediately initiate a risk assessment and an investigation to determine the need for further action.

4.1 Reporting of observed or suspected cases of sexual exploitation, abuse or harassment

All employees, consultants, partners or companies who have signed a contract or agreement with DTDA are obliged to report immediately to their supervisor (in the case of DTDA employees) or to their contact person in DTDA (in the case of non-employees) if they observe or learn about any instances of sexual exploitation, abuse or harassment committed by a DTDA employee or a DTDA partner, or if they have substantiated suspicion that such acts are taking place.

If reporting to the relevant DTDA supervisor or contact person is not possible because the reporting involves that same person, the matter should be raised with the DTDA Director. If reporting to the DTDA Director is not possible because the reporting involves that same Director, the matter should be reported to DTDA's Chairman of the Board whose contact details can be found on [DTDA's website](#).

Alternatively, reporting can be made by use of DTDA's whistleblowing/complaint mechanism which can be found [here](#) on DTDA's website, or by writing directly to: complaint@dtdda.dk. The whistleblowing/complaint mechanism is handled by DTDA's Compliance & Management Coordinator who is instructed to report directly to DTDA's Chairman of the Board if the received report implicates the DTDA Director.

All reports will be handled with confidentiality, and no organisation or person reporting in good faith will be subjected to any kind of reprisals for submitting information pertaining to this policy. DTDA's management shall do its best to ensure that all staff feel able to submit a report without fear of reprisals, and loyalty towards colleagues or the workplace must never lead to instances of sexual exploitation, abuse or harassment going unreported. Similarly, DTDA shall, to the best of its abilities, ensure that partners and other external stakeholders feel able to submit a report without fear of reprisals.

If DTDA should receive an anonymous report, this will be treated with the same degree of seriousness as a report submitted by an identifiable sender. However, the person reporting the instance of sexual exploitation, abuse or harassment should be aware that anonymous reports are much harder to investigate and less likely to lead to conclusive and actionable findings.

Any reports involving managerial staff of the DTDA shall be brought to the attention of the DTDA Chairman of the Board.

4.2 Reporting by survivors

DTDA shall apply a survivor-centred approach, which means that priority is given to the safety, rights, needs and wishes of individuals who have experienced sexual exploitation, abuse or harassment. The approach also implies that survivors are treated with dignity and respect, and that they are empowered to participate in all decisions that affect them. Finally, it means that DTDA shall provide the necessary and needed assistance and support, such as counselling or psychological treatment, to any survivor of sexual exploitation, abuse or harassment committed by an employee or representative of DTDA.

Anyone who experiences sexual exploitation, abuse or harassment committed by an employee or representative of DTDA or by a DTDA partner is strongly encouraged to report this to DTDA. DTDA will treat all reports seriously, regardless of the context of the reported instance or the persons involved, and the organisation shall ensure that all reported cases are duly investigated.

Reporting can be done to the relevant Head of Sub-Regional Office (at country level), to a Head of Department or to the Director at DTDA Head Office (in Denmark), or directly to the PSEAH focal point at DTDA's Head Office.

Alternatively, reporting can be made by use of DTDA's whistleblowing/complaint mechanism which can be found [here](#) on DTDA's website, or by writing directly to: complaint@dtdda.dk. The whistleblowing/complaint mechanism is handled by DTDA's Compliance & Management Coordinator who is instructed to report directly to DTDA's Chairman of the Board if the received report implicates the DTDA Director.

All reports will be handled with high confidentiality, and the number of people involved in the follow-up will be kept to a minimum. Unless the reported instance concerns the holders of either of these functions, the DTDA Director and the PSEAH focal point will always be involved in the follow-up on any reports concerning sexual exploitation, abuse or harassment.

If DTDA should receive an anonymous report, this will be treated with the same degree of seriousness as a report submitted by an identifiable sender. However, the person reporting the instance of sexual exploitation, abuse or harassment should be aware that anonymous reports are much harder to investigate and less likely to lead to actionable conclusions.

There shall be no reprisals for anyone who truthfully reports an incident of sexual exploitation, abuse or harassment, including in cases where a subsequent investigation turns out to be inconclusive.

Any reports involving managerial staff of the DTDA shall be brought to the attention of the DTDA Chairman of the Board.

4.3 Investigations and subsequent follow-up actions

DTDA shall ensure a prompt, thorough and appropriate investigation of all reports concerning sexual exploitation, abuse or harassment, regardless of how the information has reached the organisation.

Unless a reported case involves the persons holding these functions, the DTDA Director shall, in consultation with the Compliance & Management Coordinator and the PSEAH focal point, undertake an immediate risk-assessment concerning the safety and wellbeing of the survivor(s) in question and initiate an investigation of the reported allegations. In order to ensure that a survivor-centred approach is consistently applied throughout the process, DTDA shall make use of a Standard Operating Procedure (SOP) for the management of reports concerning sexual exploitation, abuse or harassment.

If DTDA receives a report with allegations concerning sexual exploitation, abuse or harassment committed by a staff member of one of DTDA's partners, DTDA shall, as pertinent, collaborate with the management of the given organisation with an eye to making sure that a prompt, thorough and appropriate investigation is carried out and that relevant follow-up is guaranteed.

Depending on the findings of any investigation commissioned or carried out or by DTDA itself, the DTDA Director shall decide on the appropriate course of action and communicate this to the involved parties, with particular attention to the protection needs of the survivor(s) involved. If the investigation concludes that sexual exploitation, abuse or harassment has taken place, DTDA shall:

- Ensure that prompt and decisive disciplinary action is taken against the person(s) who have committed the acts of sexual exploitation, abuse or harassment.
- Support the reporting of the case to the police, if the survivor decides to do so, and contribute to the police investigation by availing relevant information and documentation.
- Offer psychosocial or other relevant support to the survivor, in accordance with his/her needs and wishes.
- Ascertain whether there is a need for enhanced preventive measures, e.g. through strengthened procedures, training of staff or capacity building of partners.

Finally, the DTDA Director shall ensure that the Chairman of the Board is notified in confidentiality about the final outcome of the investigation and the respective actions that will be pursued by DTDA, in accordance with the points set out above.

5. Monitoring

DTDA shall ensure periodic monitoring of the application of this policy at all relevant levels, including through monitoring visits and partner meetings.