

# Safeguarding Policy: Preventing Sexual Exploitation, Sexual Abuse and Sexual Harassment

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## 1. Policy Overview

Democracy Reporting International staff must treat their programme recipients, partners, and fellow staff members with respect and dignity. In order to do so, they must not sexually exploit, sexually abuse, or sexually harass others. If they are found to have sexually exploited, sexually abused or sexually harassed others, they will face strict consequences.

DRI staff must report any instance where they may suspect or notice signs of sexual exploitation, sexual abuse or sexual harassment.

DRI programme recipients and partners are also encouraged to report any signs of sexual exploitation, sexual abuse or sexual harassment.

How to report:

**Reporting Sexual Exploitation, Sexual Abuse or Sexual Harassment:**

- In-person to the Safeguarding Focal Point
- Through the dedicated email address [ReportingSEAH@democracy-reporting.org](mailto:ReportingSEAH@democracy-reporting.org)
- Through the 'Safeguarding Reporting Form'

Once a report is made, the Safeguarding Focal Point will manage the next steps together with the Director of HR and Administration. This includes coordinating any necessary assistance for the victim, gathering information for the case, and sharing with the Executive Management/Board/external agencies for the final decision.

Please note that all reporters and victims of sexual exploitation, sexual abuse, and sexual harassment will be supported throughout the process. This also includes maintaining their anonymity as much as possible.

## 2. Introduction

This Safeguarding Policy establishes a set of definitions, protocols and practices to guide the conduct and decision-making of DRI staff and other defined stakeholders in regard to incidents of or concerns about sexual exploitation, sexual abuse and sexual harassment. This policy defines prohibited behaviour, establishes what is expected of DRI staff and defined stakeholders in regard to safeguarding and lays out the actions that DRI will undertake in the case of a breach of this policy.

### 2.1 Scope of this Policy

This policy applies to anyone who works for or represents DRI. This includes all DRI staff members<sup>1</sup> in Headquarters and all Country Offices. It also includes representatives of DRI, including but not limited to DRI board members, shareholders, experts, trainers, facilitators, speakers, authors etc. during the time that they work for or in the context of their representation of DRI. This policy uses the terms “staff” or “staff and defined stakeholders” as relevant.

DRI commits to this policy and to actively engaging in its implementation:

- DRI staff must adhere to this policy as a prerequisite for employment. The policy will be annexed to all (employment) contracts. In addition, staff will receive regular knowledge sharing and mandatory trainings on safeguarding issues, organized and documented by the Safeguarding Focal Point.
- DRI partners will be informed of this safeguarding policy as part of their contractual agreements with DRI, including all sub-grantee or third-party contracts. DRI partners are defined stakeholders under this policy and must adhere to it as a prerequisite for working with DRI.
- DRI external stakeholders, including programme recipients, are encouraged to access this safeguarding policy on DRI’s website. From here, programme recipients can inform themselves of the policy and the options for reporting concerns or incidents.

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<sup>1</sup> This includes employees in registered offices and HQ; international and national inhouse experts (i.e. staff members in non-registered DRI offices); and volunteers

This policy will be reviewed and updated in line with statutory obligations and best practice every two years. **DRI's Executive Management (EM) team** are ultimately accountable for this policy and its implementation; the Director of HR and Administration is the leading responsible EM team member. **DRI's Board** is responsible for the oversight of this policy's implementation. DRI's EM has appointed a **Safeguarding Focal Point (SFP)** and delegated responsibility for coordinating the implementation of this policy to the SFP. At country office level, **Country Directors/Country Representatives** (including **Office Directors** and **Programme Directors**, where applicable) are responsible for the implementation of this policy and its associated procedures. Country Directors, Country Representatives, Office Directors and Programme Directors are responsible for appropriate referrals and information-sharing with the SFP. They are not responsible for holding investigations at any level.

The **Safeguarding Focal Point (SFP)** is the main contact for all aspects regarding the Safeguarding Policy and safeguarding practice within DRI. For more information on the responsibilities of the SFP, see Annex I.

The current<sup>2</sup> Safeguarding Focal Point is:

- Gizem Bilim, Human Resources Officer, HQ<sup>3</sup>
- Tel. +49 (0)30 27 877 30-06
- [g.bilim@democracy-reporting.org](mailto:g.bilim@democracy-reporting.org)

The leading Executive Management member responsible for this policy is:

- Marcel Merle
- Tel. +49 (30) 27877 300-5
- [m.merle@democracy-reporting.org](mailto:m.merle@democracy-reporting.org)

The leading board member responsible for this policy is:

- Urdur Gunnarsdottir, DRI Board Member
- [U.Gunnarsdottir@democracy-reporting.org](mailto:U.Gunnarsdottir@democracy-reporting.org)

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<sup>2</sup> A change of SFP will be communicated to all staff and defined stakeholders by email

<sup>3</sup> In the SFP's absence, the Director of HR and Administration will cover their duties

### 3. Definitions

#### 3.1 Safeguarding

**Safeguarding** at DRI refers to the prevention of, mitigation of, and response to sexual harm perpetrated by a staff member or defined stakeholder against children or adults through the delivery of DRI's programmes or in the communities we serve. Specifically, safeguarding aims to prevent sexual exploitation and sexual abuse perpetrated by any person who represents DRI as a staff member or defined stakeholder. Additionally, safeguarding at DRI includes the prevention of and response to sexual harassment, which is prohibited.<sup>4</sup>

#### 3.2 Sexual Exploitation, Abuse, and Sexual Harassment (SEAH)

The following definitions apply for **sexual exploitation, abuse, and sexual harassment (SEAH)**:<sup>5</sup>

**Sexual exploitation**: 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. It includes trafficking and exploiting adults into transactional sex (also known as prostitution).

**Sexual abuse**: the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual slavery, child abuse and sexual assault.

**Sexual harassment**: any unwelcome conduct of a sexual nature that causes offense or humiliation, such as unwelcome sexual advances, requests for sexual favours, and other verbal or physical sexual conduct. It may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing whether the conduct causes offense, the perspective of the victim shall be considered.

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<sup>4</sup> Source: Open Briefing

<sup>5</sup> Source: <https://www.un.org/preventing-sexual-exploitation-and-abuse/>

There is a common confusion between sexual exploitation and sexual abuse and sexual harassment. The main difference relates to whom it affects, known as the victim or survivor:

- Sexual exploitation and abuse affect an individual or individuals who are outside of DRI staff and defined stakeholders. A victim/survivor is a person who is or has been sexually exploited or abused by staff or a defined stakeholder. Victims/survivors are typically but not exclusively children and vulnerable adults (i.e., the people DRI serves/programme recipients/beneficiaries).
- Sexual harassment affects colleagues and partners defined in this policy as DRI staff and defined stakeholders.

## 4. Standards

### 4.1 Prevention of Sexual Exploitation, Abuse, and Harassment (SEAH)

DRI has a zero-tolerance policy towards sexually exploitative, abusive, or sexually harassing acts being perpetrated by or on our staff or anyone associated with the delivery of our programmes. All DRI staff and defined stakeholders are bound to uphold this policy and have a duty to report incidents that they believe contravene it. Additionally, DRI supervisors have a duty to ensure that allegations of sexual exploitation, sexual abuse, and sexual harassment are referred for investigation. DRI supervisors are responsible for carrying out any action points or recommendations resulting from an investigation.

DRI has a duty to provide appropriate and confidential assistance to victims/survivors of sexual exploitation, sexual abuse, and sexual harassment perpetrated by or on our staff or anyone associated with the delivery of our programmes.

### 4.2 DRI Safeguarding Core Principles

DRI staff are bound by the six Safeguarding Core Principles:

1. DRI staff must not commit acts of sexual exploitation, sexual abuse or sexual harassment at any time. Sexual exploitation, sexual abuse and sexual harassment all constitute serious misconduct and, as a breach of this policy, are grounds for disciplinary action.
2. Sexual activity with children (persons under the age of 18) is prohibited, regardless of the local age of consent. Mistaken belief in the age of a child is not a defence.
3. Engaging with adults exploited into transactional sex (also known as prostitution) is prohibited.
4. DRI staff have a duty to report any instance where they may suspect or detect signs of sexual exploitation, sexual abuse or sexual harassment using the appropriate channels as set out in this policy.
5. DRI has a duty to protect those who report suspected sexual exploitation, sexual abuse or sexual harassment and the suspected victims/survivors.
6. DRI staff, especially supervisors at all levels, must create and maintain an environment that supports the prevention of sexual exploitation, sexual abuse or sexual harassment. Supervisors have a duty to promote the implementation of this Safeguarding Policy.

## 5. Breaches of the Safeguarding Policy & Reporting Procedures

### 5.1 Obligations

1. **All staff** are obligated to:
  - a. Be aware of this policy
  - b. Comply with this policy
  - c. Report breaches of this policy using the channels set out in this policy
  - d. Cooperate with investigations
2. **Supervisors** are obligated to promote this policy and be aware of their collective duty of care. They must:
  - a. Ensure that all allegations of sexual exploitation, sexual abuse or sexual harassment are referred appropriately using the channels set out in this policy. Supervisors must refer quickly and fairly, regardless of whom the concern or allegation involves.
  - b. Ensure that mandatory action points, including disciplinary measures arising from completed investigations, are implemented.
3. DRI's **Executive Management (EM)** and the **Safeguarding Focal Point (SFP)** are responsible for the implementation of this policy and will hold all staff accountable for compliance with its terms (for further details, see paragraph 1.1).
4. All **DRI partners** are obligated to ensure that they do not engage in, condone, or tolerate sexual exploitation, sexual abuse or sexual harassment with respect to DRI staff or anyone associated with the delivery of DRI's programmes. Partners are defined stakeholders and must acknowledge and adhere to DRI's policy as a prerequisite for working with us.

### 5.2 Reporting Procedures for Potential Breaches of this Policy

Potential incidents of sexual exploitation and sexual abuse affect programme recipients while potential incidents of sexual harassment affect DRI staff and/or defined stakeholders. Different reporting procedures apply as set out below.



An incident of sexual exploitation or sexual abuse must always be reported; although a victim/survivor of sexual harassment may choose to take an informal route in addition to reporting (see 5.2.2).

In all cases, the following terms apply:

- **Victim/survivor:** an individual who has been subject to or alleges an incident of sexual exploitation, sexual abuse or sexual harassment.
- **Reporter:** an individual who reports an incident of or concern around sexual exploitation, sexual abuse or sexual harassment. A reporter may be referred to as a whistle-blower. A reporter might be a victim/survivor.
- **Perpetrator/alleged perpetrator:** an individual who is found to have or is alleged to have committed an act of sexual exploitation, sexual abuse or sexual harassment. Alternative terminology includes subject of complaint or alleged abuser.
- **Formal Report:** the official means of notifying the SFP and DRI of a safeguarding concern or incident, either in-person, through the dedicated email address, or through the reporting form on the DRI homepage.
- **Informal Guidance:** the unofficial means by which a victim/survivor discusses a sexual harassment concern or incident with the SFP and seeks advice. This is only available in the case of sexual harassment (not for sexual exploitation or abuse).

### 5.2.1 Reporting Potential Incidents of SEA

**Anyone who suspects SEA is required to report it.** Do not remain silent. There are multiple options to report:

- In-person to the Safeguarding Focal Point
- Disclosure through a dedicated email address [ReportingSEAH@democracy-reporting.org](mailto:ReportingSEAH@democracy-reporting.org)
- Using the 'Safeguarding Reporting Form' on the DRI homepage

All avenues of reporting are equally secure and monitored by the SFP personally (not automated).

**What to Report:**

A reporter is not required to hold any particular information about the situation they are reporting. If they are in possession of the information, a reporter should share:

- **Who** committed the suspected SEA? (Provide full names, titles and organization, if possible).
- **Who** was involved (potential victim/survivor(s))? Were there any witnesses?
- **What** happened?
  - Describe any known details of the incident or allegation.
- **When** and **where** incident(s) took place, providing dates, times and locations.

When reporting an incident of SEA, staff and programme beneficiaries should remember:

- That proof is not necessary before reporting, but all reports must be made in good faith
- Not to investigate. Reporters should not contact the alleged perpetrator(s) directly in an effort to determine facts, demand explanations, or retaliation
- To always maintain strict confidentiality, including not discussing the issue with anyone within DRI (other than through the reporting channels set out in this policy) or outside of DRI (except as required by law)
- To respect the dignity, wishes and rights of those affected by SEA
- That the confidentiality of the reporter, the alleged victim/survivor, and the alleged perpetrator will remain as confidential as possible (circumstances permitting) during and after the reporting procedures.

### 5.2.2 Reporting Potential Incidents of Sexual Harassment

Anyone who is subject to, or suspects, **sexual harassment** at DRI has two options: seeking informal guidance or filing a formal report.

#### Informal Guidance

Anyone who is subject to harassment is encouraged to, if possible, inform the alleged perpetrator that the conduct is unwanted and unwelcome. This may stop the harassing behaviour.

The victim/survivor may seek informal guidance in the form of advice from the Safeguarding Focal Point about how to proceed, without necessarily filing a formal report. This could include deciding with the support of the SFP that they wish to seek resolution through mediation by a third party, such as the SFP or Director of HR and Administration. All information shared will be handled discreetly and with care.

### Formal Report

If the matter is not suitable for mediation; if the victim/survivor considers that the informal guidance was unsuccessful; or if a victim/survivor does not wish to seek informal guidance, a victim/survivor may seek advice from the Safeguarding Focal Point about filing a formal report.

Again, there are multiple options to formally report a potential incident of sexual harassment:

- In-person to the Safeguarding Focal Point
- Disclosure through a dedicated email address [ReportingSEAH@democracy-reporting.org](mailto:ReportingSEAH@democracy-reporting.org)
- Using the 'Safeguarding Reporting Form' on our homepage

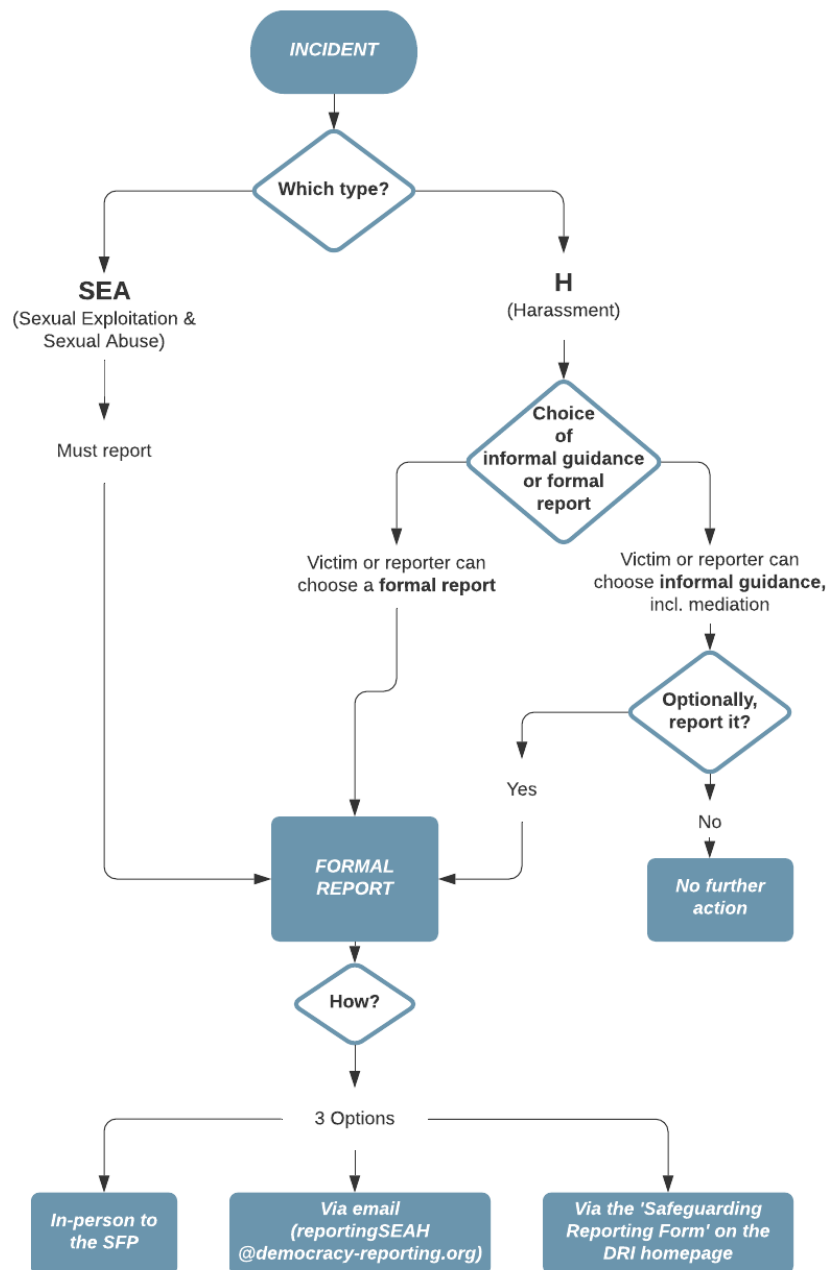
All avenues of reporting are equally secure and are monitored by the SFP personally (not automated).

#### What to Report:

- **Who** committed the suspected sexual harassment? (Provide full names, titles and organization, if possible).
- **Who** was involved (potential victim/survivor(s))? Were there any witnesses?
- **What** happened?
  - Describe in detail what is known or suspected about a sexual harassment incident.
- **When** and **where** incident(s) took place, providing dates, times and locations.

DRI recognizes that staff and defined stakeholders may become aware of a potential incident of SEAH through differing means, such as in person, via email accounts (personal, DRI individual and DRI general), or via social media accounts. In all cases, staff must maintain strict confidentiality and never share or forward the message (either internally or externally). They must instead report the incident or allegation via one of the designated channels set out in this policy.

### Reporting Procedures: Potential Incidents of SEAH



### 5.3 What Happens When a Report is Submitted

All reports of SEAH are treated seriously and with care. The Safeguarding Focal Point manages all steps of the process, from receiving and reacting to the formal report, to closing the case and logging lessons learnt.

#### Receiving the Formal Report

The Safeguarding Focal Point will receive the formal report either in person, via the dedicated email address, or via the 'Safeguarding Reporting Form' on DRI's homepage.

If receiving it in person, the SFP will take the following steps:

- listen carefully, accept the account and refrain from giving a personal opinion in relation to the concern
- record in writing all details that the reporter is willing to give
- invite further information without asking leading questions or pressuring the reporter
- reassure the reporter that the concern will be handled immediately and shared among relevant staff on a 'need to know' basis only. The reporter will be informed that their disclosure will not be entirely confidential due to the process of assessing and investigating the claim
- record all available contact information, including the reporter, the alleged perpetrator, and any witnesses or others who might corroborate the report
- inform the reporter that they will get back to them within 72 hours to confirm next steps, which may include commencement of an investigation
- file the report in a 'Safeguarding Reporting Form'
- inform at least one member of Executive Management that a report has been filed and that an initial assessment will begin

If receiving a report via the dedicated email address or via the 'Safeguarding Reporting Form' on DRI's homepage, the SFP will take the following steps:

- confirm receipt of the email or form within 24 hours
- reassure the reporter that the concern will be handled immediately and shared among relevant staff on a 'need to know' basis only. The reporter will be informed that their disclosure will not be entirely confidential due to the process of assessing and investigating the claim

- inform the reporter that they will get back to them within 72 hours to confirm next steps, which may include commencement of the investigation
- file or add to the report in the 'Safeguarding Reporting Form' as necessary
- inform at least one member of the Executive Management that a report has been filed and that an initial assessment will begin

### Reacting to the Formal Report

Once a 'Safeguarding Reporting Form' (which also records the contents of a disclosure via an in-person meeting or the dedicated email address) is received by the SFP, they will:

- Allocate a unique reference number to the case
- Log every action and collate correspondence (all hard copies will be stored in a locked file)
- Set up an Initial Assessment with the Director of Administration and Human Resources. The Executive Director will be informed immediately about the case and the planned steps.
  - If the Director of HR and Administration is part of the complaint, the SFP will set up the assessment with the Executive Director; if the Executive Director is part of the complaint, the SFP and Director of HR and Administration will contact the responsible board member.
  - The purpose of an **Initial Assessment** is to establish if there are sufficient grounds to carry out further fact-finding which could confirm if there was an incident of SEAH.

Potential outcomes of an Initial Assessment are:

- **NFA** – no further action. If the SFP and Executive Management member (usually the Director of HR and Administration) conclude that the Safeguarding Reporting Form does not reference a safeguarding concern or incident, this will be noted on the form, the case will be closed, and the reporter will be informed of this outcome in writing.
- **Fact-finding** – the SFP will collect basic information in order to clarify the nature of the concerns in the Safeguarding Reporting Form to determine if there is enough evidence to commission a formal enquiry.
- **Low Threshold** – a low threshold case is one in which the SFP and Executive Management member conclude that the required action points are internal and low level, such as advice, support, training or performance management.
- **High Threshold** – a high threshold case is either:

- 1. one in which the SFP and Executive Management member conclude that an instance of SEAH did occur. In this scenario, sanctions and disciplinary measures will follow.
- 2. one in which the SFP and Executive Management member conclude that the matters are beyond the scope of DRI to investigate and manage. In this case, experienced external expert input can be requested to undertake the investigation. Depending on the outcome of the external investigation, DRI Executive Management will decide upon which sanctions or disciplinary measures will be applied.
- **Partner Investigation** – a case is lodged against DRI as an organization. In this case, DRI will invite partners to investigate the case as they see fit.

### Closing a Case

The SFP can consider a safeguarding case to be closed under the following circumstances:

- it is judged to be **NFA**
- all **Low Threshold** action points are completed and logged
- its **High Threshold** status results in a referral to an external agency, such as the police or a social care agency, which takes over responsibility for the case. Although it is then considered closed by DRI, follow-up action points such as disciplinary processes, Victim/Survivor Assistance, or staff training may be necessary.

In all cases, the Safeguarding Focal Point will inform the reporter and the victim/survivor(s). Depending on the type of decision, and severity of the breach, the reporter and the victim/survivor(s) may not be informed of the final outcome or the consequences for the perpetrator, for confidentiality reasons.

In all cases, paperwork and digital records will be securely held and filed by the Safeguarding Focal Point, who will maintain a detailed register of safeguarding issues raised and relevant outcomes. Data is kept confidential but is subject to being shared upon request and in anonymized format, with DRI's Executive Management or board.

## Concluding Steps

### a. Lessons Learned

A thorough review meeting between the SFP and members of Executive Management will be held after every safeguarding case, in which learning will be explored and actioned, so that DRI's policies and procedures are updated accordingly. An anonymized overview of complaints, cases and lessons learned will be shared in the annual report to the board. The aim is to identify and implement preventative measures, so that DRI and defined stakeholders avoid future cases.

### b. Victim/Survivor Assistance and Support

The SFP will support all parties of a safeguarding allegation or incident, including alleged perpetrator(s), but especially victim/survivor(s). The SFP will provide appropriate assistance and support in a timely manner, either through internal or external means (such as [Open Briefing's Wellbeing and Resilience services](#)).

### c. Supporting Whistle-blowers

DRI recognizes that those who raise concerns (reporters, survivors, witnesses, and advocates) often face challenges following a disclosure. DRI and the SFP will prioritize the safety, wellbeing, and anonymity (if possible) of all whistle-blowers and those working on a case.

If a whistle-blower feels that their concern has not been handled appropriately or that they were the subject of retaliation as a result of raising a concern, they may lodge a complaint with any member of Executive Management (EM). Complaints of this nature will be processed by the Safeguarding responsible on the EM team (usually the Director of HR and Administration) and a member of DRI's board. Once the EM member and board member have reached a decision, they will share the outcome with the whistle-blower.

## 5.4 Sanctions & Disciplinary Measures

Anyone who has been found to have breached this policy/committed SEAH is liable to any of the following sanctions, depending on the severity of the breach:

1. Meeting with a member of Executive Management and a written warning
2. Dismissal/termination/repatriation to their home country
3. Legal Action (referral to the relevant law enforcement or social care agency).

## 5.5 Confidentiality and Protections from Retaliations

DRI has introduced this procedure to enable staff and defined stakeholders to raise or disclose concerns of SEAH at an early stage and in a clearly defined manner. This policy



applies in all cases where genuine concerns of SEAH exist, regardless of where this may be and whether the information involved is confidential or not.

If a member of DRI staff or a defined stakeholder has a genuine concern of a breach of this policy and has a reasonable belief it is in the public interest, even if it is later discovered that they were mistaken, under this policy they will not be at risk of any form of retaliation. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the breach.

All inquiries, reports and investigations are treated confidentially. Moreover, only staff directly connected to the report will receive information about the investigation process and outcome and must adhere to strict confidentiality processes. The confidentiality of the reporter, the victim/survivor, and the alleged perpetrator will be maintained to the extent possible (circumstances permitting) during and after the reporting procedures.

## Annex 1

### Safeguarding Focal Point: Background and Responsibilities

#### Safeguarding Focal Point: Background

The Safeguarding Focal Point (SFP) is a role which is appointed by Executive Management based on background, knowledge and skills. The appointed staff member must be adept at handling safeguarding issues and managing safeguarding procedures at DRI. Relevant skills include:

- Developing DRI's Safeguarding Policy and understanding DRI's Gender Policy
- Holding the appropriate skills, knowledge, and prior experience, with passion to be able to deliver on the Safeguarding Policy Focal Point responsibilities (see below)
- Demonstrating an ability to maintain confidentiality where appropriate and knowing its limits, seeking appropriate input to aid decision-making on a 'need to know' basis and referring on when a case is beyond the remit of an internal process
- Holding personal values, ethics, and attitudes which are in alignment with the principles of the Safeguarding Policy and DRI's organisational values
- The ability to reflect on their value system and take account of potential biases towards individuals (including children and young people) in all their diversity
- Having the authority and ability to challenge inappropriate behaviour at all levels
- Functioning as an appropriate advocate and role model for DRI at all times
- Displaying good coordination, communication and facilitation skills

#### Safeguarding Focal Point: Responsibilities

- Act as an ambassador and role model of the Safeguarding Policy at all times
- Provide guidance and support to all staff to ensure that policy measures are integrated into DRI's organizational culture and that risks are identified and mitigated
- Ensure that all staff are informed of the policy, including their individual obligations, by organizing ongoing briefings, inductions, and trainings on the topic
- Ensure that all partners and defined stakeholders are informed of the policy and adhere to it

- Coordinate with programme managers to ensure that DRI's safeguarding measures are integrated into its activities
- Manage reports of SEAH, according to section 4.3 above
- Manage the register of cases and reflect on lessons learnt, in order to prevent future cases
- Continuously review and develop the Safeguarding Policy and procedures in line with current best practices and global guidelines