



DOT Code of Conduct

Introduction

In keeping with its vision and values, Digital Opportunity Trust (DOT) is committed to maintaining the highest degree of ethical conduct amongst all its employees and affiliated personnel. To help increase understanding, this Code of Conduct details DOT's expectations of DOT employees, implementing partner employees, affiliated personnel, and youth leaders in key areas, and includes DOT's Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH); Anti-Violence and Anti-Harassment in the Workplace; Active Bystander; and Whistleblowing policies.

Scope and Purpose

This Code of Conduct applies to all employees of DOT, DOT Affiliates and DOT Branches, including board members, volunteers, interns and youth leaders, and individual and corporate contractors of DOT Affiliates and Branches. This includes non-DOT entities and their employees and individuals who have entered into partnership or sub-grant agreements with DOT.

The purpose of this Code of Conduct is to set out the conduct expected of all employees and affiliated personnel while under contract to DOT. The policies included in this Code of Conduct form part of all contracts. The Code of Conduct is applicable at all times. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.

Mission and Values

DOT's mission is to create a youth-led movement of daring social innovators who have the tools, knowledge, and networks to create opportunities and transform their own communities.

We have the following shared values:

YOUTH-LED We believe in the power and potential of young people.

DIGITAL We believe that locally relevant digital technology can accelerate and increase positive social impact.

INCLUSIVE We bridge gender and social barriers.

LOCAL We support local social innovators, local communities, and local staff.

OPEN We are clear and transparent about our work and results.

COLLABORATIVE We collaborate across sectors and geographies to achieve positive social impact.

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Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy

Policy Objective

It is the objective of Digital Opportunity Trust (DOT) to ensure a policy of zero tolerance for sexual exploitation, abuse, and harassment (SEAH) for all of DOT's employees, affiliated personnel, and participants of DOT's programs, including all children, youth, and adults, and ensure all stakeholders have a clear understanding of the roles, responsibilities and expected standards of conduct in keeping with the Inter-Agency Standing Committee's (IASC) six core principles relating to sexual exploitation and abuse.¹

DOT is committed to creating and maintaining a safe environment for all people, free from SEAH, internally and in the communities where DOT operates (either directly or through implementing partners), through robust prevention of SEAH and survivor-centered responses.

A key pillar to creating safe workplaces and programs at DOT is our PSEAH Policy, which all DOT's employees, affiliated personnel and youth leaders must sign and abide by across all countries in the DOT network.

Policy

SEAH violates universally recognized international legal norms and standards and are unacceptable behaviors and prohibited conduct for all humanitarian workers and development workers including DOTs employees and related personnel.²

DOT has a policy of zero tolerance for SEAH. DOT **employees, implementing partner employees, affiliated personnel, and youth leaders** are expected to uphold the highest standards of personal and professional conduct at all times and to provide international development assistance in a manner that respects and fosters the rights of participants and other vulnerable members of the local communities.

Integral to DOT policy is its commitment to do no harm to all children, youth and adults. DOT has zero tolerance for incidents of violence or abuse against children or adults, including sexual exploitation and abuse, committed by DOT employees and affiliated personnel.

¹ Inter-Agency Standing Committee's Six Core Principles Relating to Sexual Exploitation and Abuse, 2019. <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

² UN Secretary General's Bulletin ST/SGB/2003/13, 2003. <https://undocs.org/en/ST/SGB/2003/13>

DOT has a policy of zero tolerance for SEAH amongst staff. DOT employees and associated personnel are expected to uphold the highest standards of personal and professional conduct at all times.

DOT will take all necessary measures to prevent sexual exploitation and abuse and appropriately respond to suspected or known incidents through education and training, its reporting procedure and complaints mechanism and its support services for survivors to ensure disclosures and reports are managed effectively, confidentially and in a timely manner.

DOT is committed to using a survivor-centred, trauma-informed approach that speaks to the special needs associated with helping children, youth and adult survivors.

DOT will make every effort to create and maintain a safe environment, free from SEAH, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEAH framework, including prevention and response measures.

SEAH by DOT employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment.³

No action taken will be taken against any member of staff who reports in good faith information indicating a violation of the PSEAH Policy. Retaliation against any person who reports an incident or participates in an investigation is prohibited. Retaliation including bullying, coercion or harassment are subject to disciplinary measures and/or dismissal.

Failure to report any known or suspected SEAH incident or breach of the PSEAH Policy or if a staff member knowingly and wilfully reports false or malicious information regarding another member of staff, will result in disciplinary measures and/or dismissal.

Last updated: May 9, 2025

This policy will be reviewed annually.

Roles & Responsibilities Regarding SEAH and Participants

The responsibilities of all DOT employees, implementing partner employees, affiliated personnel, and youth leaders are in keeping with the Inter-Agency Standing Committee's 6 core principles relating to Sexual Exploitation and Abuse (see Annex).

DOT employees, implementing partner employees, affiliated personnel, and youth leaders are obliged to create and maintain an environment which prevents sexual exploitation

³ Including all other forms of contractual agreements, such as for example volunteer assignment.

and abuse and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

DOT employees, implementing partner employees, affiliated personnel, and youth leaders should:

- a) treat all participants with dignity;
- b) acknowledge and respect all participants' rights⁴ at all times;
- c) make all efforts to ensure an environment are safe, secure and prevent sexual exploitation and abuse of all participants and other vulnerable members of the local communities;
- d) ensure language, actions and relationships with all participants are age-appropriate and are free from any indications of sexual harassment, misconduct or abuse;
- e) ensure that all physical and online contact with all participants is appropriate both in the local culture and according to international standards;
- f) readily and always accept accountability for their behaviour and response to a child or youth who acts in a sexually inappropriate manner;
- g) avoid being placed in a compromising or vulnerable position with children and youth;
- h) when possible, ensure two or more adults supervise all activities involving children and youth, and are visible and present at all times;
- i) readily share all relevant information for investigations (internal and external) related to SEAH of any participants and make available all information for the completion of investigations;
- j) understand that concerns about the absence of evidence or a lack of clarity over consent are not reasonable grounds to delay or fail to report concerns about exploitation or abuse. Failure to report a concern may lead to disciplinary action;
- k) immediately report through DOT's complaints mechanism any known or suspected SEAH incident or breach of this policy involving a participant.
- l) know that sexual exploitation and abuse constitutes an act of gross misconduct and are grounds for termination of employment and that those involved maybe subject to prosecution;
- m) treat any information communicated to them regarding a suspected or actual SEAH incident as confidential, including an investigation into allegations of exploitation or abuse;

⁴The Convention on the Rights of the Child <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>;
The Universal Declaration of Human Rights <https://www.un.org/en/universal-declaration-human-rights/>

All DOT employees, implementing partner employees, affiliated personnel, and youth leaders must not:

- a) engage in sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense;
- b) allow the occurrence of marriage of a child or youth participant if made aware;
- c) exchange money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior which are prohibited. This includes exchange of assistance that is due to participants;
- d) engage in any commercially exploitative activities with children including child labour or trafficking;
- e) engage in any sexual relationship with participants or other vulnerable members of the local community that involves improper use of rank or position. Such relationships undermine the credibility and integrity of humanitarian aid and international development work;
- f) subject a child to physical, emotional or psychological abuse, or neglect;
- g) engage in behaviour including fondling, holding, kissing, hugging or touching any participant in an inappropriate or culturally insensitive way;
- h) use language, make suggestions or offer advice to a participant which is inappropriate or abusive, including language that causes shame or humiliation, or is belittling or degrading;
- i) spend time alone with a participant, away from others or behind closed doors or in a secluded area;
- j) condone or participate in behaviour with participants which is illegal, unsafe or abusive;
- k) hit or use other corporal punishment against a child while the child is in the care of a DOT employee or affiliated personnel doing work for DOT;
- l) misuse or be careless with personal data about individual participants;
- m) communicate with a child in DOT program areas via digital platforms (e.g. Facebook, Twitter), via mobile technology (e.g. texting, Whatsapp, Skype), or online without consent and knowledge of his/her parents; Communications on mobile, digital or online platforms with participants should never be inappropriate or sexual in nature;
- n) stay silent, cover up, or enable any known or suspected safeguarding incident or breach this policy;
- o) subject an at-risk adult to physical, emotional or psychological abuse, or neglect;
- p) stay silent, cover up, or enable any known or suspected safeguarding incident or breach this policy;
- q) retaliate against any person who reports an incident or participates in an investigation. Retaliation including bullying, coercion or harassment are subject to disciplinary measures and/or dismissal. See DOT's Whistleblowing and Violence and Harassment Policies for more details.

Roles & Responsibilities Regarding SEAH Incidents Involving Staff

DOT employees, implementing partner employees, affiliated personnel, and youth leaders are obliged to create and maintain a work environment which prevents sexual exploitation and abuse and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

DOT employees, implementing partner employees, affiliated personnel, and youth leaders should:

- a) treat all staff and affiliated personnel with dignity and according to DOT Code of Conduct;
- b) make all efforts to ensure environments are safe, secure and prevent sexual exploitation and abuse of all DOT employees and affiliated personnel;
- c) ensure language, actions and relationships with all DOT employees and affiliated personnel are free from any indications of sexual harassment, misconduct or abuse.
- d) ensure that all physical and online contact with all DOT employees, implementing partner employees, affiliated personnel, and youth leaders is appropriate both in the local culture and according to international standards;
- e) readily share all relevant information for investigations (internal and external) related to SEAH of any DOT employee or affiliated personnel and make available all information for the completion of investigations;
- f) understand that concerns about the absence of evidence or a lack of clarity over consent are not reasonable grounds to delay or fail to report concerns about exploitation or abuse. Failure to report a concern may lead to disciplinary action;
- g) immediately report through DOT's reporting procedure any known or suspected SEAH incident or breach of this policy involving a DOT employee or affiliated personnel;
- h) know that sexual exploitation and abuse constitutes an act of gross misconduct and are grounds for termination of employment and that those involved may be subject to prosecution;
- i) treat any information communicated to them regarding suspected or actual SEAH incidents as confidential, including an investigation into allegations of exploitation or abuse.
- j) if they are aware and/or have witnessed a SEAH or sexual harassment incident and/or have been asked by a survivor for help in reporting please follow the Guidelines for the Active Bystander and follow the reporting procedure for SEAH.

All DOT employees, implementing partner employees, affiliated personnel, and youth leaders must not:

- a) use SEAH as a form of intimidation and coercion;
- b) develop or seek a sexual relationship between staff in a hierarchical relationship (e.g. manager and direct report; manager and intern) as it creates an unequal power dynamic;
- c) record, photograph, transmit, view, distribute intimate or sexual images without the knowledge and consent of all parties;
- d) engage in a sexual activity with any DOT employee or affiliated personnel when they are incapacitated (i.e. asleep, unconscious, under the influence of anesthesia or an intoxicant) and they are unable to voluntarily agree to sexual activity and/or they do not have the control over their body, or they are otherwise unaware that a sexual activity is occurring or are unable to appreciate the nature of the act.
- e) subject DOT employees, affiliated personnel, partners, youth leaders, or youth participants to physical, emotional or psychological abuse;
- f) engage in behaviour including fondling, holding, kissing, hugging or touching with any staff member which is inappropriate or culturally insensitive;
- g) use language, make suggestions or offer advice to a DOT employee or affiliated personnel which is inappropriate or abusive, including language that causes shame or humiliation, or is belittling or degrading;
- h) condone or participate in behaviour with DOT employees or affiliated personnel which is illegal, unsafe or abusive;
- i) communicate with DOT employees, implementing partner employees, affiliated personnel, and youth leaders on work channels like emails, Skype, and other online or social media platforms in an inappropriate or sexual way;
- j) 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 exchange of assistance that is due to participants;
- k) stay silent, cover up, or enable any known or suspected safeguarding incident or breach this policy;
- l) retaliate against any person who reports an incident or participates in an investigation. Retaliation including bullying, coercion or harassment are subject to disciplinary measures and/or dismissal. See DOT's Whistleblowing and Violence and Harassment Policies for more details.

Prevention Measures

Vetting: DOT will systematically vet all prospective job candidates in accordance with established screening procedures.

Training: DOT will hold mandatory induction trainings and build a training schedule for

refresher trainings⁵ and orientations for all employees and related personnel on the Organization's PSEAH policy and procedures. Staff will be required to review and sign off on reading this policy and supporting documents (see annex) annually.

DOT will hold mandatory orientation training for participants on DOT's PSEAH policy and Complaints Mechanism. They will also be trained on DOT's Investigation Procedure.

Those involved with receiving incidents will be trained on sexual violence incident reporting and management including knowing how to receive information about an incident of sexual violence, how to maintain confidentiality and objectivity as well as how to respond appropriately to reduce re-traumatization and help create trust in organization's reporting structures.

Revision and Updates: DOT's Executive Team will review and update the PSEAH policy and procedures as needed. A mandatory revision and approval by the DOT Executive Team will be done annually in May.

Programme and Activity Design: DOT will develop a risk assessment tool for all programmes and activities to avoid and/or mitigate risk of SEAH.

Response Measures

Reporting: DOT has safe, confidential and accessible mechanisms and procedures for personnel, participants and communities to report SEAH allegations. Information on these procedures and mechanisms can be found in the PSEAH Policy and PSEAH and SH Reporting Procedure for Staff and PSEAH and SH Complaints Mechanism for participants. The documents include the different channels available to report an incident to offer as many options as possible that are confidential and accessible.

At all stages of collection and use of the information a survivor provides about an incident, their informed consent will be obtained.

Those involved with receiving incidents will be clear with the survivor on what next steps will be, ensure confidentiality is maintained amongst staff members who know and advise them how to respond appropriately to questions if asked about the incident. Those involved with receiving incidents will also ensure communication protocols between DOT and associated entities are followed and take proactive measures with the media, if it looks like the incident will be covered, including ensuring the media does not disclose names of those involved in the incident including the survivor.

⁵ The training includes at a minimum: 1) a definition of SEAH (that is aligned with the UN's definition); 2) a prohibition of SEAH; and 3) actions that employees and related personnel are required to take (i.e. prompt reporting of allegations and referral of survivors).

Investigation: DOT has an investigation procedure for SEAH allegations. If it is determined that an allegation of SEAH is in fact a potential violation of the PSEAH Policy, DOT will, without delay, initiate the investigation procedure or refer to the proper investigative body if the perpetrator is affiliated with another entity. See PSEAH Investigation Procedure for more information.

All incidents shall be reported to DOT's Executive Team immediately. Any significant incidents will be reported to the Board of Directors during quarterly meetings. Personal details will be omitted to ensure confidentiality.

Incidents will be reported to donors as per their identified requirements and timelines.

All follow up actions are to be reported to the Board of Directors to ensure commitment and follow through on actions.

Referral to National Authorities: If, after proper investigation, there is evidence to support allegations of SEAH, these cases may be referred to national authorities for criminal prosecution.

Victim Assistance: DOT has a system to promptly refer SEAH survivors to available services, based on their needs and consent.

Cooperative Arrangements: DOT contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on PSEAH and to take measures to prevent and respond to SEAH.

The failure of those entities or individuals to take preventive measures against SEAH, to investigate allegations thereof, or to take corrective action when SEAH has occurred, shall constitute grounds for termination of any cooperative arrangement.

Anti-Violence and Anti-Harassment in the Workplace Policy

Policy Objective

The purpose of this policy is to ensure a violence and harassment-free workplace; identify and define unacceptable behaviour; be explicitly clear there is zero-tolerance for sexual exploitation and abuse (SEAH); share responsibilities all employees have; provide guidelines on how to be an active bystander using a survivor-centred approach and share the reporting and complaints mechanisms in place.

Policy

Consistent with DOT's vision, mission and core values, as well as its commitment to diversity, DOT seeks to create and maintain an organizational environment that is free of discrimination, harassment, exploitation and violence, and to ensure the same in all of its work with communities and partners. This is critical to its effectiveness as an organization. Each member of the community with whom DOT works or provides assistance must have DOT's utmost assurance that they will not be subject to any form of workplace violence. Equally, each DOT employee must have the opportunity to contribute fully to DOT's mission in a work environment that is free from all forms of social discrimination.

To fulfill these aims, DOT expressly prohibits and will not tolerate any form of discrimination, harassment, exploitation or violence. This includes workplace bullying, workplace harassment, workplace violence, sexual harassment, and any form of discrimination, harassment, exploitation or violence that is physical, sexual or psychological.

This policy applies to all work-related settings and activities, whether inside or outside the workplace.

Last updated: May 9, 2025

This policy will be reviewed annually.

Responsibilities

Outlined below are behaviours and actions DOT expressly prohibits and will not tolerate. Breaching this policy can result in disciplinary measures and/or be grounds for dismissal.

Maintaining a harassment-free environment requires effort on the part of every DOT employee. This means that all employees should:

- maintain a high standard of behaviour and set a personal example;
- immediately report through DOT's reporting procedure any known or suspected incident or breach of this Policy; for SEAH incidents or for sexual harassment, employees should follow DOT HQ's SEAH reporting procedure.
- know that sexual exploitation and abuse constitutes an act of gross misconduct and are grounds for termination of employment and maybe subject to prosecution;
- apply an active bystander approach shared in DOT's onboarding training and below when interacting with any DOT employee who has experienced a known or suspected incident;
- treat any information communicated to them regarding suspected or actual

incidents, including PSEAH and investigations into allegations of discrimination, harassment, exploitation or violence with confidentiality.

Reporting Procedure for Workplace Bullying, Violence, and Harassment

For employees and affiliated personnel of DOT Global:

If you feel you have been harassed in the workplace:

- a) If you feel comfortable doing so, tell the person involved as soon as possible how you feel and ask that she/he stop the conduct you find offensive;
- b) If you feel uncomfortable approaching the person, or if the harassment continues, bring the issue immediately to the attention of the Senior HR Manager.

For employees and affiliated personnel of DOT Affiliates and Branches, refer to your DOT office's Human Resources Manual.

For DOT's training program facilitators (youth leaders):

If you feel you have been harassed in the workplace:

- c) Bring the issue immediately to the attention of the In-Country Gender and Safeguarding lead. You can also reach out to any DOT team member you feel most comfortable with.

For implementing partner staff, refer to your organization's Human Resources Manual.

Reporting Procedure for SEAH or Sexual Harassment

DOT has safe, confidential and accessible mechanisms and procedures for personnel, participants and communities, including children, to report SEAH allegations. Information on these procedures and mechanisms and how to report an incident can be found in the PSEAH and SH Reporting Procedure for Staff and PSEAH and SH Complaints Mechanism for participants. Information on the investigation procedure can be found in the SEAH Investigation Procedure.

At all stages of collection and use of the information a survivor provides about an incident will be obtained with their informed consent.

Investigation:

For Workplace Bullying, Violence, and Harassment:

- a) DOT may, if it is necessary, make temporary work arrangements to ensure that no

further incidents may occur while DOT investigates the situation.

- b) DOT will start to investigate immediately (no more than three days after the occurrence is reported), and will keep documentation throughout the investigation.
- c) DOT will interview the employee, and obtain and record details.
- d) DOT will interview the alleged perpetrator and record his/her side of the story.
- e) DOT will interview any witnesses of the incident(s), and record their statements.

For SEAH or Sexual Harassment:

DOT has a process for investigation of SEAH allegations and sexual harassment in place. If it is determined that an allegation of SEAH is in fact a potential violation of the SEAH Policy DOT will, without delay, initiate an investigation of SEAH by its employees or related personnel or refer to the proper investigative body if the perpetrator is affiliated with another entity. See DOT's SEAH Investigation Procedure for more information.

All incidents shall be reported to DOT's Executive Team immediately; any significant incidents will be reported to the Board of Directors during quarterly meetings. Personal details will be omitted to ensure confidentiality.

Incidents will be reported to donors as per their identified requirements and timelines.

Guidelines for the Active Bystander⁶

Being an active bystander is being the one who comes in direct contact with a victim/survivor who shares what has happened to them and/or asks for help. An active bystander can also be a witness to an incident and comes to the aid of a victim/survivor. This person engages with a victim/survivor with a survivor-centred approach so that the person feels supported and safe. As an active bystander:

Do

- actively listen, without judgement or editing the survivor's narrative;
- ask open-ended questions that do not suggest blame or shame;
- let the survivor know they are not alone – by your presence and words;
- tell them you believe them;
- thank them for sharing what they have been through with you;
- remind them that what happened is not their fault;
- ask what they need and help them obtain it;

⁶ Report The Abuse - Addressing Sexual Violence in Humanitarian Organisations: Good Practices for Improved Prevention Measures, Policies, and Procedures, August 2017
<https://bit.ly/3cypC19>

- place small decisions in their hands – such as where to go or what to eat – to build back up their confidence and trust; and
- accompany them, if they desire, to the doctor or other appointments and/or ask them for their consent to direct them to someone (including the Safeguarding Focal Point) who can accompany them if you can't and stay with them until you are able to ensure they are in the company of someone who will ensure their safety and confidentiality. Refer to DOT's PSEAH and SH Reporting Procedure for DOT employees, implementing partner employees, affiliated personnel, and youth leaders and DOT's PSEAH and SH Complaints Mechanism for participants for who you can reach out to to help support the victim/survivor.

Don't

Just as importantly, never do the following:

- ask if they are sure or question the narrative of their experience;
- express disbelief or support for the perpetrator's behaviour or character;
- suggest the survivor should feel shame for experiencing sexual violence;
- suggest that reporting the incident will damage the survivor or perpetrator's life or career; and
- threaten to harm or retaliate against the survivor for reporting.

Whistleblowing Policy and Procedure

Objective

It is vital that everyone who works for DOT maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. With this in mind, the objective of this policy is to encourage and enable employees and affiliated personnel to raise concerns regarding gross misconduct, violations and breaches to DOT's policies and procedures without fear of reprisals and in the knowledge that they will be protected from victimisation and dismissal. A person who, in good faith and on the basis of a reasonable belief that gross misconduct has occurred, reports the suspected misconduct is a whistleblower.

Policy

Consistent with DOT's vision, mission and core values, DOT seeks to create and maintain an organizational environment that maintains the highest standards of conduct, integrity and ethics and complies with local legislation. All DOT employees have a responsibility to practice these standards and to be compliant with applicable laws and regulations. If this responsibility is in doubt or is not followed and/or DOT employees, implementing partner

employees, affiliated personnel, and youth leaders are in gross misconduct, violation and/or in breach of DOT's policies and procedures, DOT encourages and enables employees and affiliated personnel to raise concerns through this policy and procedure. DOT will accordingly take steps to address them.

Last updated: May 9, 2025

This policy will be reviewed annually.

Grounds for Whistleblowing

Grounds for whistleblowing (reporting gross misconduct, violations and breaches to DOT's policies and procedures) will include incidents as follows :

- Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
- A failure to comply with any legal obligations
- Sexual misconduct, including sexual exploitation and abuse of children, youth and/or adults (see DOT's PSEAH Policy for more information)
- Abuse of position and/or abuse of trust
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behaviour
- A misuse of public funds or public assets;
- A gross mismanagement or omission or neglect of duty
- A breach to DOT's Code of Conduct
- Activity which would bring the organisation into serious disrepute
- Knowingly directing a person to commit a wrongdoing named above or
- The deliberate concealment of information relating to any of the matters listed above

No Retaliation

No action will be taken against any member of staff who reports in good faith information indicating gross misconduct in violation of DOT's Policies and Procedures. If there is a genuine concern and a reasonable belief it is in the public interest, even if it is later discovered that the whistleblower was mistaken, under this policy they will not be at risk of losing their job or from suffering any form of retribution as a result.

Retaliation against any person who reports an incident or participates in an investigation is prohibited. Retaliation including bullying, coercion or harassment are subject to disciplinary measures and/or dismissal.

No Maliciousness

Failure to report any known or suspected SEAH incident or breach of the PSEAH Policy or if a staff member knowingly and wilfully reports false or malicious information regarding another member of staff, will result in disciplinary action.

Confidentiality

Whistleblowers have a right to confidentiality other than in certain, exceptional circumstances. This includes keeping identities protected and only sharing information with the informed consent of the person/s concerned. There will be times it will not be possible to guarantee confidentiality (e.g. where a referral is made to national authorities, or where the witness' identity will be readily inferred). In such cases informed consent should be the guiding principle. Information needs to be shared on a 'need to know' basis. The identity of those involved will only be disclosed on an authorized basis where referral to national authorities is indicated. Records will be stored securely to avoid accidental or unauthorized disclosure of information.

DOT will ensure confidentiality in managing cases but cannot guarantee confidentiality if required to provide all information by law. All attempts will be made at all stages of collection and use of the information a survivor provides about an incident, to receive their informed consent and maintain confidentiality.

What are not Grounds for Whistleblowing

Though important to report issues that are personnel-related or are a disagreement between an employee and the organization, these issues should be resolved using the appropriate policies and procedures outlined in DOT's HR Manual.

Where to Report

Incidents of gross misconduct, violations and breach in policies should first be reported by DOT staff to DOT Global's Compliance Officer.

Email: compliance@dotrust.org

Reports should include all pertinent information with regard to the suspected gross misconduct including any documentation or other evidence. Reports made to the DOT Compliance Officer will be supported by filling out the appropriate form to ensure all information is captured as thoroughly as possible. While reports of suspected gross misconduct may be submitted anonymously, it is best practice to include the name of the individual making the allegation to add credibility to the allegation and facilitate a more effective investigation.

Role of Staff

All staff should:

- Report incidents of theft, fraud, corruption, any other incidents of malpractice in the workplace immediately to the DOT Compliance Officer.
- Report incidents of SEAH according to the PSEAH Policy, PSEAH Reporting Procedure and PSEAH Complainants Mechanism as appropriate.

Report Management and Investigation Procedure

Once a report has been submitted, it will be determined, by the Compliance Officer, whether the whistleblower's allegation constitutes gross misconduct, violation or breach of DOT's policies.

If it does not meet grounds for whistleblowing, the whistleblower will be informed and their permission sought to forward the report to the DOT Global's Senior HR Manager in order to follow the appropriate HR procedure.

If there is gross misconduct as it related to DOT's PSEAH policy, coordinated action will be taken by the DOT Global or the DOT Country Safeguarding Focal Point, the Country Director and the DOT Global COO to ensure the PSEAH and Sexual Harassment (SH) Reporting Procedure or the PSEAH and SH Complaints Mechanism has been followed depending on who has been impacted (staff or participant). If it is found that a SEAH allegation warrants an investigation, the PSEAH and SH Investigation Procedure will be followed and the whistleblower will be informed accordingly of next steps.

When matters related to fraud and corruption are reported to the Compliance Officer, appropriate measures will be taken. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

Definitions

DOT employees, implementing partner employees, affiliated personnel, and youth leaders: All employees of DOT, DOT Affiliates and DOT Branches, including Board members, volunteers, interns and youth leaders (training program facilitators); non-DOT entities and their employees who have entered into partnership or sub-grant agreements with DOT; and individual and corporate contractors of DOT Affiliates and Branches and DOT implementing partners, collectively referred to as affiliated personnel.

Active Bystander: A person who comes in direct contact with a victim/survivor who shares what has happened to them and/or asks for help. An active bystander can also be a witness to an incident and comes to the aid of a victim/survivor. This person engages with a victim/survivor with a survivor-centred approach so that the person feels supported and safe.

Alleged perpetrator: A person accused of sexual exploitation, sexual abuse, sexual harassment (SH), violence or any other actions outlined in this policy which are discouraged and prohibited.

Participant: A child, youth or adult who directly receives goods or services from DOT or its associated entities. Note that misuse of power can also apply to the wider community that the DOT serves, and also can include exploitation by giving the perception of being in a position of power. Throughout this document the term “participant” will mean child, youth and adult.

Child: A person below the age of 18.⁷

Youth: The United Nations defines youth as persons between the ages of 15 and 24 years of age. The definition was made in 1985 and endorsed by the General Assembly (see A/36/215 and resolution 36/28, 1981).⁸ According to the UN Department of Economic and Social Affairs Youth “the category of “youth”, it is also important to distinguish between teenagers (13-19) and young adults (20-24), since the sociological, psychological and health problems they face may differ.”⁹

Confidentiality: Complainants, witnesses and alleged perpetrators have a right to confidentiality other than in certain, exceptional circumstances. This includes keeping identities protected and only sharing information with the informed consent of the person/s concerned. There will be times it will not be possible to guarantee confidentiality (e.g. where a referral is made to national authorities, or where the witness’ identity will be readily inferred). In such cases informed consent should be the guiding principle. Information needs to be shared on a ‘need to know’ basis. The identity of those involved will only be disclosed on an authorized basis where referral to national authorities is indicated. Records will be stored securely to avoid accidental or unauthorized disclosure of information.

DOT will ensure confidentiality in managing cases but cannot guarantee confidentiality if required to provide all information by law. All attempts will be made at all stages of

⁷ The Convention on the Rights of the Child

<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

⁸ <https://www.un.org/development/desa/youth/what-we-do/faq.html>

⁹ Ibid.

collection and use of the information a survivor provides about an incident, to receive their informed consent and maintain confidentiality.

Complainant: The person making the complaint, including the alleged victim/survivor of sexual exploitation/ abuse.

Informed Consent: The voluntary agreement of an individual who has the capacity to give consent, and who exercises free and informed choice.

Protection from Sexual Exploitation and Abuse (PSEAH): The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or affiliated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Sexual abuse: This is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes any action in which, through coercion (including the use of drugs or alcohol), threat or force, the perpetrator subjects the victim to sexual touch that is unwanted and offensive. Sexual assault can range from unwanted touching, kissing and groping, to battery, attempted rape, rape, and sexual torture.

Sexual exploitation and abuse This is 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.

Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes any action in which, through coercion (including the use of drugs or alcohol), threat or force, the perpetrator subjects the victim to sexual touch that is unwanted and offensive. Sexual assault can range from unwanted touching, kissing and groping, to battery, attempted rape, rape, and sexual torture.

Sexual harassment: This is unwelcome advances of a sexual nature. "Unwelcome" means that the other person is made uncomfortable by their actions. Examples of unwelcome sexual advances include but are not limited to: requests for sexual favors; sexually suggestive gestures; sexual jokes; discussions of a sexual nature; leering; advances or propositions, display of sexually offensive material; and other visual, verbal or physical conduct of a sexual nature.

These actions constitute sexual harassment when the conduct has the purpose or effect of creating an intimidating or hostile work environment.

Sexual harassment takes many forms. For example, it may:

- Be conducted toward any individual, regardless of sex;
- Be used as a form of intimidation and coercion;
- Occur between peers or between individuals in a hierarchical relationship;
- Be aimed at coercing an individual to participate in an unwanted sexual relationship or have the effect of causing an individual to change behavior;
- Consist of repeated actions or be a single incident.

Sexual misconduct: Sexual misconduct is a broad term encompassing any unwelcome behavior of a sexual nature that is committed without consent or by force, intimidation, coercion, or manipulation. It includes sexual exploitation, sexual abuse and sexual harassment. Sexual misconduct can be committed by a person of any gender, and it can occur between people of the same or different gender.

Survivor: A person who has experienced violations and abuse and is also an active agent who challenges the abuse, abusers, and systems that perpetuate violence. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Victim: The person who is sexually exploited or abused. This term is not meant to imply a lack of strength, resilience or capacity to survive.

Witness: Any person giving testimony or evidence in the investigation, including but not limited to the victim, the complainant, a participant, a staff member of a partner agency, the subject of the complaint or another DOT staff member.

Workplace Bullying: This consists of constant nit-picking, fault-finding and criticizing another trivially (the triviality, regularity and frequency betray bullying); minimizing another's contributions, achievements, existence, value, status, worth or potential; singling out or treating another differently; marginalizing, overruling, ignoring, or sidelining another; belittling, demeaning or patronizing another, whether in private or in front of others; humiliating, shouting at or threatening another; overloading or taking away another's responsibilities; distorting or misrepresenting another's words; displaying immaturity, impulsiveness, aggression, manipulation, distrust or deceitfulness; behaving in a vengeful, disruptive, ungrateful, rigid or inflexible manner towards another. Bullying can be physical, sexual or psychological. Bullying may be an accumulation of many small incidents over a period of time.

Workplace Harassment: This means engaging in a course of vexatious comment or conduct against a worker in our workplace that is known or ought reasonably to be known to be unwelcome. "Unwelcome" means that the other person is made uncomfortable by the actions. Workplace harassment may include bullying, intimidating

or offensive behaviour, including jokes or innuendos, displaying or circulating offensive pictures, comments or materials, or offensive or intimidating phone calls and stalking. Offensive behaviour includes prejudice and overt bias, hostility or negative feelings expressed about a person or group. It can also be a type of stereotyping i.e. attributing the same characteristics to all members of a group, regardless of individual differences which is often based on misconceptions, incomplete information and/or false generalizations and assumes negative characteristics about a group.

Workplace Violence: This is the use of physical force against a worker, in the workplace, that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker, in our workplace, that could cause physical injury to the worker; a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in our workplace, that could cause physical injury to the worker.

Associated Procedures

DOT PSEAH and SH Reporting Procedure
DOT PSEAH and SH Investigation Procedure

The undersigned has carefully read and understands the policies and associated procedures included in this Code of Conduct and agrees to abide by its requirements.

Name: _____

Organization: _____

Title: _____

Signature: _____

Date: _____

Annex - IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019¹⁰

Published Date: 23 September 2019

1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. 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 regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefiting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

¹⁰ Inter-Agency Standing Committee's Six Core Principles Relating to Sexual Exploitation and Abuse, 2019. <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>