

## Transparency International Denmark

### Policy for reporting integrity violations / whistleblowing

*Adopted by the board on the 08 04 2021*

#### 1. Purpose

Transparency International Denmark wants to continuously learn from our stakeholders and improve the quality of our work. Therefore, we are open to all complaints and feedback about our work. We encourage that comments and complaints about our work are raised and discussed directly with the relevant volunteer, member of staff or our Board if possible. The Complaints Handling System presented here is viewed as the final resort.

#### 2. Key principles for handling reports/complaints

- **Non-reprisal:** Stakeholders, Staff, volunteers, and elected members of the board in TI-DK must be able to lodge their concerns without fear of reprisal or unfair treatment as a consequence of complaining.
- **Confidentiality:** TI-DK will do its utmost to ensure that complaints are handled with confidentiality. The fact and nature of the complaints, the identities of those involved and documentation resulting from the investigation therefore remain confidential and are only shared on a need-to-know basis in order to conduct the necessary investigation or provide care/ expert advice.
- **Anonymity:** If you wish for your complaint to be anonymous, you don't need to provide your name or position in any notification. Irrespective of your wish for anonymity, to conduct a proper investigation, please provide as detailed information as possible, including the time and place of the incident, names and titles of individuals involved, and any other information you can provide. If you submit your complaint anonymously, please also provide a means of communication for the responsible parties to obtain additional information on the incident. In certain instances, TI-DK can reject an anonymous report, if the request for anonymity precludes a fair, thorough, and expedient handling of the complaint. If the complainant has provided means of communication, they will be notified of the rejection.
- **Fair and expedient handling of complaints:** TI-DK strives to ensure handling all complaints by the same principles, regardless prior knowledge of events or people involved. In respect of everyone involved, we strive for expedient handling of all complaints.

#### 3. Who can report through the TI-DK complaints mechanism?

Staff, volunteers, elected members of the board in TI-DK or anyone directly or indirectly affected by the actions of the organisation can report through the complaint mechanism.

A volunteer or staff member, who purposely makes false accusations about another staff member, will be subject to disciplinary action (warning/dismissal/exclusion).

#### 4. What can be reported

The complaints mechanism deals with reports of suspected or proven integrity violations in relations to TI-DKs activities, projects, or actions, such as (but not limited to) breaches to law, internal policies, or stated principles.

If the complaint is not within the scope of TI-DKs complaints mechanism, the complainant will be informed about this situation and if possible recommended where to launch the complaint instead.

#### 5. How to report suspected or actual integrity violations at the secretariat

The Ethics Committee of the board of TI-DK is responsible for handling any reports of integrity violations involving board members and the secretariat. All reports should be directed to the Committee's e-mail: [etik@transparency.dk](mailto:etik@transparency.dk).

The members of the Ethics Committee share responsibility for investigating reports of suspected or actual integrity violations and ensuring a timely and thorough process. Decisions in the Committee are made by consensus.

Suppose the suspected or actual integrity violation involves a member of the Ethics Committee. In that case, they are disqualified from any involvement in managing the report to ensure a fair and unbiased process. If the reported violation raises concerns as to the integrity of the Ethics Committee as a whole, the report will be forwarded to the Ethics Committee of the International Board of Directors in Transparency International (the central secretariat in Berlin). If the complainant has apprehensions as to whether TI-DK's Ethics Committee is an appropriate authority to manage your particular report, they can contact the Transparency International's Ethics Committee of the International Board of Directors directly on their e-mail: [ethics@transparency.org](mailto:ethics@transparency.org).

If your report includes information or files that call for enhanced security measures, please inform the Ethics Committee. They will provide instructions on transferring the information via a secure and encrypted channel.

#### ***Suggested information to include in a report***

- Broad description of the suspected violation
- Detailed information: What happened?
- Detailed description of what the reporter knows about the issue or incident(s), and how they came to know about it.
- Who is involved? Who is responsible, and was anyone else involved?

- When did the incident(s) occur?
- Information about dates and times, if available.
- Where did the incident(s) occur?
- Were there any additional witnesses we may be able to contact?
- Anything else? It is not the job of the person reporting to investigate, but s/he may provide any available documents, photos, screenshots, messages, etc. that they already hold, if those help to clarify the report.
- Date of report
- Preferred contact details

## 6. How a report is handled

TI-DK adheres to principles defined in the Core Humanitarian Standard on Quality and Accountability (CHS) in their management of any reports of actual or suspected integrity violations. Information on the complainant and complainee(s) will be collected, stored, and subsequently deleted in compliance with the European General Data Protection Regulation (GDPR). Only members of the Ethics Committee will have direct access to case materials.

- 1) Upon receiving a report, the Ethics Committee assesses whether the complaint is within the scope of TI-DK's complaints mechanism and addresses any conditions that could raise concerns regarding the integrity of the process. Following this assessment, the Ethics Committee will inform the complainant whether the report has been discarded, redirected, or accepted for further investigation. If the report is discarded, the Ethics Committee will redirect the complainant to other channels where they can launch their complaint to the best of their ability.
- 2) When the Ethics Committee accepts a report for further investigation, the complainee(s) and the TI-DK board will be notified. The complainee(s) can either admit to violating the code or challenge the report.
- 3) If the complainee(s) denies violation of the code, the handling of the complaint proceeds in the following steps:
  - a. The complainee(s) will receive a copy of the report, in which sensitive personal information is removed to accommodate the complainant's wellbeing and potential requests for anonymity. As a minimum, they will be notified of the charge and primary evidence supporting that charge for them to prepare a defense. If the Ethics Committee finds it appropriate, given the complaint's content, they may suspend the complainee(s) until a conclusion is reached.
  - b. Upon receiving reports from both the complainant and complainee(s), the Ethics Committee will decide whether the material provided is sufficient to establish a breach of code. If not, the Ethics Committee will request additional information from the complainant and complainee(s) at its discretion.
  - c. When the Ethics Committee finds the material sufficient to assess a breach of code, the Committee will deliberate. Suppose the Ethics Committee establishes that there has been a breach of the code. Then, they will decide on disciplinary measures by consensus.

- 4) Upon reaching a conclusion, the complainant and complainee(s) will receive a notification including 1) a declaration on whether the Ethics Committee has identified a breach of code, 2) a description of the material that led them to their particular decision, 3) the potential initiation of disciplinary actions, and 4) a guide that explains which entities should be contacted in the complainant or complainee(s) wish to appeal the decision made by the Ethics Committee.

TI-DK strives toward handling all complaints expediently and thoroughly. Reports will be processed within two months after the complaint has been accepted and three months after receiving the complaint at the latest.

### 1. Related policies

This policy interlinks with two other key documents in TI-DK:

1. Policy for Prevention of Sexual Harassment, Exploitation and Abuse
2. Transparency International Denmark – Vedtægter (Statutes)

### 2. Review process

This policy will be reviewed initially after one year and afterwards every five years by the Board of TI-DK in consultation with the volunteer group and staff in the secretariat, unless an earlier need is identified by either staff or volunteers.



## Transparency International Denmark

### Policy for Prevention of Sexual Harassment, Exploitation and Abuse

*Adopted by the board on the 04 08 2021*

#### 3. Purpose

The main purpose of this policy is to promote greater accountability and outline the key responsibilities of Transparency International Denmark (TI-DK) in preventing sexual exploitation, abuse, and harassment.

The objective of this policy is to increase awareness and prevent misconduct, including (sexual) exploitation, abuse and/or harassment by providing clear guidance to address these issues. The following standards apply to all staff, volunteers, consultants, interns, national as well as International staff, and any other individuals representing the organisation.

The standards in this policy are based on internationally recognized human rights standards. Where a conflict exists between the standards in this policy and national law in a given country, Transparency International abide by the relevant Human Rights standards, using its leverage and dialogue where necessary to manage conflicts.

#### 4. Scope

This policy applies to all elected members of the board, volunteers and staff employed by or working for TI-DK.

#### 5. Definitions

**Child or minor:** A person under the age of 18 (as defined by the Convention of the Rights of the Child).

**Exploitation:** Use of one's position of authority, influence or control over resources, to pressure, force or manipulate someone by threatening or coercing them with negative repercussions such as withholding assistance, not giving due consideration to a volunteer/staff member's work support requests, threatening to make false claims about a volunteer/staff member in public, etc.

**Misconduct:** Any breach by a volunteer or staff of applicable national or international law as well as contraventions of TI-DKs internal rules or policies, including this policy, regulations or other instructions issued by the Board.

**Sexual abuse:** The actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions (United Nations Secretary General's Bulletin 2003/13, 9 October 2003; Special Measures for Protection from Sexual Exploitation and Abuse).

**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, sexually or politically from the sexual exploitation of another. This includes any exchange of money, goods or services against sexual activities and favours (United Nations Secretary General's Bulletin 2003/13, 9 October 2003; Special Measures for Protection from Sexual Exploitation and Abuse).

**Sexual harassment:** Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment or cooperation. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

**Staff:** Refers to but is not limited to all permanent and temporary staff in the secretariat, interns, consultants, observers, and all individuals working for or representing TI-DK.

**Volunteers:** Refers to elected members of the Board and to members of the volunteer-group.

## 6. Core principles

Everyone in the scope of this policy must comply with all relevant legislation, including labour laws in relation to sexual abuse, exploitation or harassment and must work and behave in a manner that respects and fosters the rights of the people they are interacting with in line with the following principles:

1. Any act of sexual exploitation, abuse or harassment is prohibited.
2. Sexual activity with children (persons under the age of 18) is prohibited, regardless of the legal age of consent or majority in the jurisdiction in which the activity occurred. Mistaken belief in the age of a child shall not be considered as defense for the purposes of disciplinary proceedings.
3. Sexual exploitation, abuse and harassment constitute acts of gross misconduct and are therefore grounds for disciplinary action up to and including termination of employment or exclusion from their membership in the board or volunteer group.
4. Where appropriate or legally required, criminal acts will also be reported to the appropriate authorities

## 7. Roles and Responsibilities

Staff and volunteers in TI-DK shall all contribute to maintaining an environment that prevents sexual abuse, exploitation, or harassment. This could, for example, mean challenging inappropriate behavior or harassment when safe and appropriate to do so. The Chairmanship (Chair and vice-chair of TI-DK) have particular responsibilities to support and develop systems that maintain this environment.

As part of employee induction, the policy will be explained by the Chair or the vice-chair. Likewise the policy will be introduced and explained on an annual basis to the volunteer group by the designated coordinator for the volunteer group (staff or member of the board).

It remains the responsibility of the chairmanship to ensure implementation of the policy.

Deviations from this policy must be approved by the board.

## 8. Related policies

This policy interlinks with two other key documents in TI-DK:

3. "Policy for reporting integrity violations / Whistleblowing"
4. Transparency International Denmark – Vedtægter (Statutes)

## 9. Review process

This policy will be reviewed initially after one year and afterwards every five years by the Board of TI-DK in consultation with the volunteer group and staff in the secretariat, unless an earlier need is identified by either staff or volunteers.

