

Safeguarding Policy for the Global Disability Programme

The Safeguarding Policy for the Global Disability Programme is based on - and takes point of departure - in DPOD's overall safeguarding policy "Retningslinjer for håndtering af krænkende adfærd" (Guidelines for Management of Abusive Behaviour).

The International Department at DPOD manages The Global Disability Programme, supporting among others collaborations between Danish disability organisations and sister organisations in the Global South, which is financed by Danish development aid. Due to collaborations with partner organisations in the Global South, there is a need for additional and more detailed guidelines, stipulating expectations regarding safeguarding in order to prevent and handle abusive behaviour in projects financed under the Global Disability Programme.

The first part of this document summarises the organisational values of DPOD and the definition of abusive behaviour as laid out in DPOD's overall safeguarding policy, followed by sections related more specifically to safeguarding measures and guidelines for the Global Disability Programme, including sections on coverage, prevention measures, reporting mechanisms and consequences.

1. Organisational values and definition of concepts of abusive behaviour.

As emphasised in DPOD's overall safeguarding policy, people working for DPOD or affiliated with DPOD are expected to treat each other with respect and contribute to an environment, where everybody can perform their duties feeling safe and comfortable. DPOD does not tolerate any forms of abusive behaviour.

Abusive behaviour is defined as follows: When a person crudely and/or repeatedly exposes another person for behaviour, which he or she perceives to be demeaning. Abusive behaviour includes:

- Threats (verbal, written or threatening behaviour)
- Physical violence
- Bullying and harassment (unpleasant, demeaning, or negative oral or written actions or behaviour, which is repeated over time)
- Sexual harassment (verbal, written or physical unwanted sexual attention)
- Discrimination (differential treatment related to e.g. gender, age, disability, ethnicity, religion, health or sexual orientation)
- Quarrels (arguments, verbal fights, or conflicts, where the communication is in a rude or demeaning tone)

It does not matter whether the abusive behaviour has been intentional or not. It is the offended part's perceived experience that counts. If such cases occur, everybody is obliged to interfere and involve the leadership.

2. Additional aspects related to International Development Cooperation

In development cooperation, it is particularly important to be aware of the inherent power imbalances¹. DPOD and member organisations are providing financial support to partner organisations and consequently, it is important to be aware that representatives of partner organisations would be in a particularly vulnerable position in case of abusive behaviour. Therefore, DPOD staff and representatives should pay special attention to prevention of abusive behaviour in their interaction with partners and to management of abusive behaviour in case it occurs.

¹ The dependency issue is further elaborated in the DPOD Partnership Policy and DPOD Guide to Partnership Engagement.

Moreover, the social codes related to abusive behaviour differ from country to country and DPOD staff and representatives as well as member organisations should keep this in mind in the interaction with partner organisations.

3. Coverage of the DPOD Safeguarding Policy for The Global Disability Programme

The policy covers persons employed by DPOD or representing DPOD, which will be described under 3.1. Moreover, the policy entails obligations for DPOD member organisations and partner organisations. This will be elaborated under 3.2 and 3.3.

3.1 Persons employed by DPOD or representing DPOD, when they are on work related travels:

- **DPOD staff.** This includes DPOD staff in both Denmark and staff living in partner countries.
- **DPOD representatives.** The term “representatives” covers DPOD’s board members, consultants, volunteers, and other people representing DPOD.

Persons working for or representing DPOD are expected to follow the values stipulated in the policy, and they are also protected by the policy and covered by the inherent handling measures. The policy only deals with actions and activities directly related to work.

3.2 DPOD member organisations

Member organizations with total grants from the Danish Disability Fund exceeding one million DKK should present a safeguarding policy or an action plan for making one as an annex to applications sent to the Danish Disability Fund. DPOD will follow up upon implementation of the action plan as part of dialogue meetings with member organisations. Partner organizations to DPOD member organisations with total grants from the Danish Disability Fund exceeding one million DKK are also obliged to develop a safeguarding policy.

3.3 DPOD partner organisations

DPOD expects partner organisations to have a safeguarding policy in place or to develop one.

DPOD expects to be informed if cases related to DPOD-financed activities or leadership level are reported.

Members of the DPOD partner organisations are free to use the DPOD whistleblower mechanism at the DPOD homepage, if their own organisations’ mechanism does not exist or is insufficient. The DPOD whistleblower mechanism is further described under “5. How to report”.

4. Prevention measures

DPOD will make sure that the DPOD Safeguarding Policy is known by the organisations and persons covered, who engage in activities under the Global Disability Programme.

Agreements of Cooperation with member and partner organisations and contracts for consultants must refer to the DPOD Safeguarding Policy for The Global Disability Programme. Agreements of Cooperation made before the policy was ratified, must include addendums.

DPOD has developed a training module on the learning site fabo.org together with CISU, CKU and DUF². The module can be found on the following page: <https://fabo.org/llab/what-is-sexual-misconduct>. The module is mandatory for people mentioned under 3.1. The module is a tool for reflection and for deepening the understanding of the concept of protection from sexual harassment, exploitation and abuse (PSHEA). If definitions and values stipulated differ from the policy at hand, it is the policy that counts.

DPOD will continuously update itself with experiences obtained by other organisations regarding PSHEA.

DPOD will also make training sessions for Danish member organizations. Furthermore, DPOD will engage in dialogue with the member organizations about PSHEA at the yearly dialogue meetings.

DPOD will make virtual trainings for the DPOD partner organisations and engage in discussions with leadership in the organisations during partner visits.

DPOD will assist the member- and partner organizations if needed in making their own safeguarding policies, reporting mechanisms and in maintaining them.

The policies should as a minimum include:

- A definition of abusive behaviour
- Prevention measures
- Handling measures
- Consequences of abusive behaviour.

Safeguarding policies for DPOD member organisations should include a plan for assisting partner organizations in setting up a policy.

5. How to report

Anyone who has observed any form of abusive behaviour can anonymously and confidentially report this to DPOD without fear of retribution. Reports can be made verbally or in writing by contacting any member of DPOD's management or through the DPOD reporting mechanism. The reporting mechanism, which is in English, can be found here:

<https://handicap.dk/about/international-cooperation/reporting-of-irregularities-in-international-activities>

The complaint can be filed in English or Danish.

5.1. Complaints procedures

When using the DPOD Reporting Mechanism, the report will be sent to DPOD's Chief Financial Officer (CFO). The CFO will subsequently assess whether DPOD's International Director will be capable (not disqualified due to involvement in the case) to lead the handling of the case or whether the case should be assigned to another person in DPOD Management Team. DPOD's PSHEA focal point can assist the assigned person in the DPOD management if not disqualified due to involvement in the case. In cases occurring in a partner country, the DPOD staff responsible for the partnership can also assist. In both instances, the involvement of staff is decided by the assigned person in the DPOD Management Team. If cases involve one of DPOD partner organisations, the assigned person in the DPOD management will decide if the Director of the partner organisation in question will be contacted. The group formed to handle the case in question will be termed "The Complaint Group".

² CISU – Civil Society in Development, CKU - Center for Church-Based Development and DUF – the Danish Youth Council.

In cases where DPOD's CFO is involved, DPOD recommends contacting either DPOD's Managing Director (CEO) or DPOD's International Director instead. Persons involved in the complaint will not be part of The Complaint Group.

5.2. Handling

All reports will be treated seriously, and The Complaint Group will strive to secure discretion for all involved parts. All reports are treated individually, impartially and in accordance with the DPOD Safeguarding Policy for The Global Disability Programme. The handling will take point of departure in the offended persons' experience of the situation leading to the report. In case the Complaint Group assesses that a further investigation of the concrete actions leading to the reported case and the involved persons' conception of the actions, it can be necessary to breach the anonymity of the offended person. This is in order to secure the most thorough investigation of the case and that all involved parties will get an opportunity to explain their take on the case.

6. Consequences

6.1. Consequences for persons mentioned under "3.1":

Consequences will follow the handling measures stipulated in the DPOD policy "Guidelines for Management of Abusive Behaviour for the DPOD secretariat" and will be decided upon by the DPOD management with involvement of DPOD political leadership. The person(s) having violated the Safeguarding Policy for the Global Disability Programme can be issued a warning, a dismissal notice, or in severe cases be reported to the police. Elected representatives or volunteers, who are not employed by DPOD, can be issued a warning, be expelled, or reported to the police.

Should the suspicion prove invalid, no action will be taken by DPOD against the informer, as all individuals should be encouraged to report without any fear of retribution.

6.2. Consequences in cases related to member organisations mentioned under 3.2:

A safeguarding policy or a road map for making one, is a requirement for member organizations receiving grants from the Danish Disability Fund that summarize into one million DKK or more. Furthermore, it is a requirement that the member organizations follow the definitions, prevention measures, handling measures and consequences stipulated in their policies.

6.3. Consequences in cases related to partner organisations mentioned under 3.3:

When supporting the setting up of a safeguarding policy, DPOD will engage in dialogue with the partner organizations, in case the safeguarding policies differ substantially from standards acceptable to DPOD.

In case DPOD and a partner organisation cannot agree on the consequences to an offender of the Safeguarding Policy, it can ultimately lead to a suspension of the partnership.