

## **Safeguarding Policy for Lev – Inclusion Denmark’s International Program**

This Safeguarding Policy for Lev - Inclusion Denmark (Lev)'s International Program is based on and takes point of departure in Lev's Code of Conduct for employees<sup>1</sup>.

The purpose of this Policy is to:

- Ensure that all who work for and represents Lev as well as organisations that receive funding from Lev understand and are well supported in meeting their responsibilities to safeguard others and themselves from abusive behavior and
- Establish procedures to prevent and deal with the actions of Lev employees, representatives and leadership in partner organisations that result in abusive behavior and/or places others at risk of the same.

The first part of this document summarises the organisational values of Lev and the definition of abusive behaviour, followed by sections related more specifically to safeguarding measures and guidelines for the International Program, including sections on coverage, prevention measures, reporting mechanisms and consequences of breaching this safeguarding policy.

### **1. Organisational values and definition of concepts.**

Lev believes all people have the right to live their lives free from sexual harassment and abuse, sexual violence, bullying, exploitation and any abuse of power regardless of their age, gender, sexuality, disability, religion or ethnic origin. Lev will not tolerate its employees, volunteers, consultants, partners' staff or any other representatives associated with the delivery of our work carrying out any form of sexual harassment, abuse or exploitation. Such abusive behavior goes against the beliefs, values and mission of our organisation. 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 take action.

Lev commits to the most widely used standards with regard to Preventing Sexual Harassment, Exploitation, and Abuse (PSHEA). Sexual harassment, exploitation and abuse, as well as a range of abuses of power, take various forms and can happen to anyone. Lev recognizes that this can happen in our workplaces and that as an organisation working with vulnerable populations, we have to do anything in our power to protect them as well as our staff.

#### **1.1 Definitions**

##### *Sexual Harassment*

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<sup>1</sup> Lev's Code of Conduct for employees will be supplemented by a Code of Conduct for volunteers.

“Sexual harassment” describes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature, from the perspective of the person being harassed. It can be directed towards one person, groups of people or towards everyone and can occur as a one-off incident or be a pattern of harmful behaviour. The effect of sexual harassment is among others to violate the dignity of another person, and to create an intimidating, hostile, degrading, humiliating or offensive environment for them and others.

Sexual harassment can take many forms, including (but not limited to):

- Verbal comments of a sexual nature, such as remarks about an employee's appearance, questions about their sex life or offensive jokes
- Non-verbal such as displaying pornographic or explicit images, staring, sexual gestures or written comments of a sexual nature
- Physical such as unwanted physical contact, touching, and assault (this includes attempts and threats to do these things)

### ***Sexual Exploitation***

The term “sexual exploitation” means 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***

The term “sexual abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

## **2. Additional aspects related to International Development Cooperation**

In development cooperation, it is particularly important to be aware of the inherent power imbalances. Lev is providing financial support to partner organisations in the Global South 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, Lev 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.

Moreover, the social codes related to abusive behaviour differ from country to country and Lev staff and representatives should keep this in mind in the interaction with partner organisations and the target group of the projects.

## **3. Coverage of the Lev Safeguarding Policy for the international program**

The policy covers persons employed by Lev or representing Lev, which will be described under section 3.1. Moreover, the policy entails obligations for Lev's partner organisations in the Global South. This will be elaborated under section 3.2.

### **3.1 Persons employed by or working for Lev and Lev representatives, when they are on work related travels:**

- **Lev staff.** This includes but is not limited to all permanent and temporary staff, interns, consultants, observers, volunteers, and all individuals working for Lev.
- **Lev representatives.** The term “representatives” covers Lev's board members, volunteers and other people representing Lev.

Persons working for or representing Lev are expected to follow the values stipulated in this policy, and they are also protected by the policy and covered by the inherent handling measures.

### 3.2 Lev partner organisations in the Global South

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

Lev expects to be informed if cases related to Lev-financed activities or leadership level in the partner organisation are reported. Reporting can happen verbally or in writing by contacting Lev's International Program staff. In these cases, members and staff of Lev's partner organisations are also free to use the DPOD whistleblower mechanism at the DPOD website. The DPOD whistleblower mechanism is further described under "5. How to report".

## 2. Prevention measures

Lev will make sure that the Lev Safeguarding Policy is known by the organisations and persons, who engage in activities under Lev's International Program.

Agreements of Cooperation with partner organisations and contracts for consultants must refer to the Lev Safeguarding Policy for the International Program. Agreements of Cooperation made before this policy was ratified, must include addendums.

As part of a comprehensive learning site<sup>2</sup>, DPOD has developed a training module on the learning site fabo.org together with CISU, CKU and DUF<sup>3</sup>. 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. If definitions and values stipulated differ from the policy at hand, it is this policy that counts.

Lev will engage in discussions with leadership and relevant program staff in the partner organisations during partner visits. Lev may use various tools from the PSHEA learning site <https://fabo.org/llab/preventing-sexual-misconduct#section-2> to facilitate the dialogue with the South partners.

Lev will assist the partner organizations if needed in making their own safeguarding policies, reporting mechanisms and in maintaining them. Lev will use the "Policy and Self Assessment Tools to Preventing Sexual Misconduct" found on the PSHEA learning site to guide this work: <https://fabo.org/course/preventing-sexual-misconduct/glossary/29079-assessment-and-building-tools-to-preventing-sexual-misconduct>

## 5. How to report through the whistleblower mechanism

Cases involving persons covered by this policy can anonymously and confidentially be reported to the DPOD whistleblower mechanism without fear of retribution. 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.

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<sup>2</sup> The purpose of the learning site is to help you facilitate a conversation in project partnerships about how to prevent sexual misconduct, which includes harassment, exploitation, and abuse. The site can be used by all members in a project collaboration: management, staff, and volunteers.

<sup>3</sup> CISU – Civil Society in Development, CKU - Center for Church-Based Development and DUF – the Danish Youth Council.

### **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 forward the case to Lev Head of International Programme after assessing whether she/he will be capable (not disqualified due to involvement in the case) to lead the handling of the case. Lev's Head of International Programme will handle the case or assign another person to handle the case according to internal procedures.

In cases where Lev Head of International Programme is involved, the case will be sent to the Director of Lev. Persons involved in the complaint will not be part of the handling process.

### **5.2 Handling**

All reports will be treated seriously, and persons handling the case will strive to secure discretion for all involved parts. All reports are treated individually, impartially and in accordance with this Safeguarding Policy for The International Programme. The handling will take point of departure in the offended persons' experience of the situation leading to the report. In case the person assigned to handle the case 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 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 for breaches of this policy**

### **6.1 Consequences for persons mentioned under section 3.1**

Lev staff who are found to contravene Lev's expectations of their sexual and personal conduct will be subject to disciplinary action depending on the case and may result in dismissal and referral to law enforcement.

Cases involving Lev representatives will be handled according to Lev's Code of Conduct for volunteers.

### **6.2 Consequences in cases related to partner organisations mentioned under section 3.2**

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

In case Lev 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.