

# **DOF BIRDLIFE'S BEHAVIOR & VALUES POLICIES AND GUIDELINES**



**Code of Conduct Policy**  
**Dignity at Work Policy**  
**Safeguarding Policy (PSHEA Policy)**  
**Anti-corruption and Irregularities Policy**  
**Complaints Policy and Procedures**  
**Anti-child Labour Policy**  
**Anti-terror Policy**

**Revised April 2026**

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It is possible to report unacceptable behavior both internally within DOF BirdLife and externally via the online complaint mechanism on the link: <https://www.dof.dk/whistleblowing>, where a link to this document with the above list for identifying who to submit a complaint/report to.

For DOF BirdLife employees, reports can also be made through a trusted colleague or another relevant person. Individuals wishing to file a complaint/report may also receive guidance from DOF BirdLife's secretariat management through direct contact (see table above).

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# INTRODUCTION

The aim of this compilation of DOF BirdLife's **Behavior and Values Policies and Guidelines** is to provide general information to employees on their employment introduction as well as a guiding reference document and tool in case of incidences.

Description of principles and guidelines for other conditions for employment in DOF BirdLife is described in DOF BirdLife's Employee Handbook including health and safety policy, disciplinary policy, employment policy, email, internet, and SoMe policies as well as the principles of storage, processing, and protection of personal data (GDPR).

If there is anything in DOF BirdLife's **Behavior and Values Policies and Guidelines** that an employee does not understand they should speak to their manager or the CEO of DOF BirdLife in the first instance.

Together with DOF BirdLife's other policies and procedures and the terms and conditions of employment the rules and guidelines contained in DOF BirdLife's **Behavior and Values Policies, and Guidelines** provide a framework within which all DOF BirdLife employees, regardless of location, undertake to discharge their duties and to regulate their conduct.

They also support DOF BirdLife in our role in implementing, monitoring, and enforcing these standards.

## Changes to Policies

DOF BirdLife reserves the right to amend DOF BirdLife's **Behavior and Values Policies and Guidelines** from time to time as a result of changes in context, new knowledge, new regulations and/or changing needs. Substantial changes to this document will and has to be approved by DOF BirdLife's Board.

DOF BirdLife's management will make every effort to notify employees when there is an update. It is though the responsibility of each employee to be conversant with the latest version of DOF BirdLife's **Behavior and Values Policies and Guidelines**, which is readily available through the DOF BirdLife website.

DOF BirdLife's management will ensure regular monitoring and implementation of actions laid down in this document, and policies will be reviewed on an annual basis.

## Scope and purpose

DOF BirdLife's **Behavior and Values Policies and Guidelines** applies to all contracted staff, international and local, employed by DOF BirdLife. Adapted **Behavior and Values Policies and Guidelines** are applicable to volunteers, partners, contractors, and suppliers.

The purpose of this compilation of **Behavior and Values Policies and Guidelines** is to set out the conduct expected of DOF BirdLife staff whilst under contract to the organisation, and forms part of all contracts of employment. The **Behavior and Values Policies and Guidelines** are always applicable.

When accepting an appointment in DOF BirdLife, the employee undertakes to discharge his/her duties and to regulate his/her conduct in accordance with the requirements of DOF BirdLife's **Behavior and Values Policies and Guidelines**, thereby contributing to DOF BirdLife's quality of performance and reputation.

The **Behavior and Values Policies and Guidelines** describes what DOF BirdLife expects from its employees and what the employees can expect from DOF BirdLife.

Whilst recognizing that national and local laws and culture differ considerably from one country to another, DOF BirdLife is a Danish Non-Governmental Organization working nationally and internationally and therefore the **Behavior and Values Policies and Guidelines** are developed from international and UN standards. DOF BirdLife staff are expected to uphold all existing laws wherever they operate nationally or internationally, as well as all exerting all expected conduct embedded in this **Behavior and Values Policies and Guidelines**.

## Consequences of violating the DOF BirdLife's Behavior and Values Policies

Breaches or violations of the provisions and intentions of this compilation of **Behavior and Values Policies and Guidelines** will be met with reactions corresponding to their nature, scope and severity - ranging from recommendations and requirements to actual sanctions: DOF BirdLife will be able to impose various types of sanctions against individuals, companies or organisations that have seriously violated DOF BirdLife's **Behavior and Values Policies and Guidelines** while under contract or representing DOF BirdLife, for example disciplinary measures against their own employees and contracting parties (warning/dismissal or exclusion), terminate contracts with grant holders and suppliers, file a police report in criminal matters. DOF BirdLife can claim compensation for damage suffered where necessary and relevant.

## Information for members and the public

DOF BirdLife's website includes a section featuring a link to this **Behavior and Values Policies and Guidelines** document, with a brief introduction. The section will also contain an overview of any material breach of the **Behavior and Values Policies and Guidelines**, with due regard to the protection of personal data. Cases regarding corruption and cases regarding breach of the safeguarding principles will regularly be published on DOF BirdLife's website with due regard to the protection of personal data. DOF BirdLife urges all members, partners, and other stakeholders to follow the same principles as in this document and to prepare their own basis for doing so, adjusted to the nature, size, etc. of the organization.

## Preventing breaches of DOF BirdLife's Behavior and Values Policies

Through information and dialogue, DOF BirdLife's management will do its utmost to make the stakeholders familiar with their responsibilities in relation to their various roles and adhere to **DOF BirdLife's Behavior and Values Policies and Guidelines**. Making international stakeholders familiar with their responsibilities within this compilation of **Behavior and Values Policies and Guidelines** falls under the responsibility of the DOF BirdLife's international team.

Key stakeholders within the different themes will be informed, where necessary, to act in accordance with **DOF BirdLife's Behavior and Values Policies and Guidelines** and to guide other stakeholders in this respect. The DOF BirdLife's management is responsible for conveying this information.

# CODE OF CONDUCT POLICY

As we work to achieve our ambition and vision of 'ensuring current and future generations the opportunity to experience a rich and varied bird life' we should always remain true to our core mission, aims and values.

In keeping with its vision and values, DOF BirdLife is committed to maintaining the highest degree of ethical conduct amongst all its staff and associated personnel including volunteers.

The Code of Conduct will provide guidance in the face of ethical dilemmas the employee may experience and details DOF BirdLife's expectations of employees in key areas.

It shows the employee what to do when a situation is complex by providing standards and values for the employee to follow and how to protect against situations that may damage the employee or DOF BirdLife.

It also seeks to ensure that employees avoid using possible unequal power relationships for their own benefit.

## Code of Conduct Standards

This set of standards are made available at appointment of DOF BirdLife staff for signature.

As a DOF BirdLife employee I will:

### **Uphold the integrity and reputation of DOF BirdLife by ensuring that my professional and personal conduct is consistent with DOF BirdLife's values and standards**

- I will treat all people fairly with respect and dignity
- When working in an international context or travelling internationally on behalf of DOF BirdLife, I will be observant of all local laws and be sensitive to local customs
- I will seek to ensure that my conduct does not bring DOF BirdLife into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed
- I will not work under the influence of alcohol or use, or be in possession of, illegal substances

### **Not engage in abusive or exploitative conduct**

- I will not engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child/young person is not a defense nor an excuse
- I will not exchange money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior, as it is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance
- I will not engage in sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics
- I will not engage in any commercially exploitative activities with children or vulnerable adults including child labour or trafficking
- I will not physically assault a child or vulnerable adult
- I will not emotionally or psychologically abuse a child or vulnerable adult

**Ensure the safety, health, and welfare of all DOF BirdLife staff members and associated personnel (volunteers, partners, suppliers, and contractors)**

- I will adhere to all legal and organisational health and safety requirements in force at my location of work
- I will comply with any local security guidelines and be pro-active in informing management of any necessary changes to such guidelines
- I will behave in a manner such as to avoid any unnecessary risk to the safety, health and welfare of myself and others, including staff of partner organisations and communities with whom we work

**Be responsible for the use of information, assets, and resources to which I have access by reason of my employment with DOF BirdLife**

- I will ensure that I use DOF BirdLife assets and resources entrusted to me in a responsible manner and will account for all money and property
- I will not use DOF BirdLife IT equipment, software or e-mail and social media platforms to engage in activity that is illegal under local, national or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism
- I will not use DOF BirdLife IT equipment to view, download, create, distribute, or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse

**Perform my duties and conduct my private life in a manner that avoids conflicts of interest**

- I will declare any financial, personal, or family (or close intimate relationship) interest in matters of official business which may impact on the work of DOF BirdLife
- I will not be involved in awarding benefits, contracts for goods or services, employment, or promotion within DOF BirdLife, to any person with whom I have a financial, personal, or family (or close intimate relationship) interests
- I will seek permission before agreeing to being nominated as a prospective candidate or another official role for any political party
- I will not accept significant gifts or any remuneration from governments, communities with whom we work, donors, suppliers and other persons which have been offered to me as a result of my employment with DOF BirdLife

**Uphold confidentiality**

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so.

## Complaints and reports

DOF BirdLife staff are obligated to bring to the attention of the relevant manager any potential incident, abuse, or concern that they witness, are made aware of, or suspect which appears to breach the Standards contained in this Code. DOF BirdLife staff reporting concerns are protected by the Disclosure of Malpractice in the Workplace policy (see section on **Complaints Policy and Procedures** below).

Staff members who have a complaint or concern relating to breach of the Code should report it immediately to their employee representative and with him/her to the line manager. If the staff member does not feel comfortable reporting to their line manager (for example if they feel that the report will not

be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a senior manager or the CEO.

Staff members receiving reports of concerns are obliged to take action or refer the report immediately as per the **Complaints Policy and Procedures** below.

# DIGNITY AT WORK POLICY

DOF BirdLife is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.

Harassment and bullying can have very serious consequences for individuals and the organisation. Harassment or bullying may make people unhappy, may cause them stress and affect their health and family and social relationships, may affect their work performance, and could cause them to leave their job. Effects on the organisation can include loss of morale, poor work performance, increased turnover of staff, legal claims, and damage to the organisation's reputation. Employees found guilty of harassment or bullying may face disciplinary penalties, up to and including dismissal. Additionally, serious harassment may be a criminal offence.

DOF BirdLife will not tolerate bullying and harassment of any kind. All allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken. The organisation will also not tolerate victimization of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint. Victimization is a disciplinary offence.

## The scope of this policy

This policy covers bullying and harassment of and by managers, employees, contractors, volunteers, agency staff and anyone else engaged to work at the organisation, whether they are in a direct contractual relationship with the organisation or otherwise.

The policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, e.g., trips and excursions, during project implementation and work-related social events.

## What is bullying and harassment?

**Bullying** is offensive, intimidating, malicious or insulting behavior, and/or an abuse or misuse of power that is meant to undermine, humiliate, or injure the person on the receiving end.

**Harassment** is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes color, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age. That has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

The conduct may be harassment whether the person behaving in that way intends to offend or not. Something intended as a "joke" may offend another person. Different people find different things acceptable. Everyone has the right to decide what behavior is acceptable to them and to have their feelings respected by others.

Behavior that any reasonable person would realize would be likely to offend will be harassment without the recipient having to make it clear in advance that behavior of that type is not acceptable to them, e.g., sexual touching.

It may not be so clear in advance that some other forms of behavior would be unwelcome to, or could offend, a particular person, e.g., certain "banter", flirting or asking someone for a private drink after work.

In these cases, first-time conduct that unintentionally causes offence will not be harassment, but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behavior is unacceptable to them.

Harassment may also occur where a person engages in unwanted conduct towards another because they perceive that the recipient has a protected characteristic (for example, a perception that they are gay or disabled), when the recipient does not, in fact, have that protected characteristic. For example, it would be harassment for an individual to tease repeatedly an individual because of an incorrect belief that the recipient is deaf.

Similarly, harassment could take place where an individual is bullied or harassed because of another person with whom the individual is connected or associated, for example if their child is disabled, wife is pregnant, or friend is a devout Christian.

A person may feel harassed even if the unwanted conduct is not directed towards them or related to their actual or perceived protected characteristic. For example, it may be harassment where a male or female employee is offended by the display of a topless calendar.

There may also be circumstances in which an individual is subjected to unwanted conduct from a third party, such as a volunteer, client, or customer. For example, it might be that a client makes a series of racist remarks to a black employee. If an employee feels that they have been bullied or harassed by customers, suppliers, vendors, or visitors, they should report any such behavior to their manager who will take appropriate action. Bullying or harassment of beneficiaries, volunteers, suppliers, vendors or visitors or others will be dealt with through the disciplinary procedure.

A single incident can be harassment if it is sufficiently serious.

All bullying and harassment are misconduct and is a disciplinary offence that will be dealt with under the DOF BirdLife's disciplinary policy. Bullying or harassment will often be gross misconduct, which can lead to dismissal without notice.

## What is victimization?

**Victimization** is subjecting a person to a detriment because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else.

Provided that the person acts in good faith, i.e., he/her genuinely believe that what he/her is saying is true, he/her has a right not to be victimized for making a complaint or doing anything in relation to a complaint of bullying or harassment and DOF BirdLife will take appropriate action to deal with any alleged victimization, which may include disciplinary action against anyone found to have victimized the person.

Making a complaint that a person know to be untrue or giving evidence that the person knows to be untrue, may lead to disciplinary action being taken against the person.

## What should I do if I think I am being bullied or harassed?

You may be able to sort out matters informally. The person may not know that their behavior is unwelcome or upsetting. An informal discussion may help them to understand the effects of their behavior and agree to change it. You may feel able to approach the person yourself, or with the help of your manager or

another independent employee. You should tell the person what behavior you find offensive and unwelcome and say that you would like it to stop immediately.

You may want to add that, if the behavior continues, you intend to make a formal complaint to your manager. You should keep a written note of the date and what was said and done. This will be useful evidence if the unacceptable behavior continues, and you wish to make a formal complaint. All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser.

You will be kept informed of the general progress of the process of investigation and, the outcome of any disciplinary proceedings. DOF BirdLife's management will decide on a balance of probabilities, after considering all available evidence, whether harassment or bullying has occurred.

DOF BirdLife will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a "need to know" basis. For example, your identity and the nature of the allegations must be revealed to the person you are complaining about, so they are able to respond to the allegations. Some details may also have to be given to potential witnesses, but this will be limited as far as possible. The importance of confidentiality will be emphasized to witnesses.

If the complaint is upheld, and a person who has been found to have harassed you is kept in the organisation's employment, managers may need to be given some information where this is necessary for them to manage the risk of further harassment by that person against you or others.

Wherever possible, DOF BirdLife will try to ensure that you and the alleged harasser are not required to work together while the complaint is under investigation. This could involve giving you the option of working from home, where possible, or remaining at home on special leave, if agreed. In the case of serious allegations, the alleged harasser may be suspended while investigation and any disciplinary proceedings are underway.

If your complaint is upheld, and the person found to have bullied or harassed you remains in the organisation's employment, every effort will be made to ensure that, if possible, you do not have to continue to work alongside the harasser if you do not wish to do so. We will discuss the options with you. These may include the transfer of the harasser or, if you wish, you may be able to transfer to another post.

If your complaint is not upheld, management will support you and the alleged harasser in making arrangements for you both to continue or resume working and to help repair working relationships. DOF BirdLife will consider making arrangements to avoid you and the alleged harasser having to continue to work alongside each other, if either of you do not wish to do this.

You have a right not to be victimized for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action against you.

## **What can I do to help stop bullying and harassment?**

**You can help to do this by:**

- being aware of how your own behavior may affect others and changing it, if necessary - you can still cause offence even if you are "only joking"
- treating your colleagues with dignity and respect
- taking a stand if you think inappropriate jokes or comments are being made
- making it clear to others when you find their behavior unacceptable, unless it should be obvious in advance that this would be the case
- intervening, if possible, to stop harassment or bullying and giving support to recipients
- making it clear that you find harassment and bullying unacceptable
- reporting harassment or bullying to your manager and supporting the organization in the investigation of complaints
- if a complaint of harassment or bullying is made, not prejudging, or victimizing the complainant or alleged harasser

**Managers have a particular responsibility to:**

- set a good example by their own behavior
- ensure that there is a supportive working environment
- make sure that staff know what standards of behavior are expected of them
- intervene to stop bullying or harassment
- report promptly to the CEO any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them

## **Making this policy work**

DOF BirdLife will also periodically monitor how successful it is being in creating a workplace free of bullying and harassment by other means which may include confidential staff surveys.

## **Dealing with claims of harassment and bullying**

DOF BirdLife is committed to providing a working environment for all its staff and volunteers that is comfortable and free from all forms of bullying and harassment. DOF BirdLife adopts a zero-tolerance approach towards bullying and harassment and any employee who is found to have harassed or bullied a colleague will be subject to disciplinary action, up to and including summary dismissal.

If DOF BirdLife has grounds to believe that an employee may have been bullying or harassing another employee, whether there has been a formal complaint, DOF BirdLife will instigate an investigation into the alleged bullying or harassment, involving the employee representative.

Any employee who believes that another employee's conduct amounts to bullying or harassment has the absolute right to complain to their line manager or CEO and involve their employee representative in this process. Employees have the right to complain if they believe that they have been bullied or harassed by a third party, for example a beneficiary, client, volunteer or supplier.

Employees are obligated to report any incidents of bullying or harassment that they experience or witness so that DOF BirdLife can investigate and resolve the matter. DOF BirdLife will take all such complaints seriously and an employee who makes a genuine complaint of bullying or harassment will be protected and will not be penalized or victimized in any way.

**As part of its investigations, DOF BirdLife will:**

- maintain confidentiality to the maximum extent possible, while the investigation of allegations will normally require limited disclosure to witnesses on a "need to know" basis
- check whether or not the employee suspected of bullying or harassment has received previous warnings for similar misconduct (or other types of misconduct) and, if so, whether any earlier warnings are active
- be responsive, sensitive and supportive towards any employee who raises a complaint of harassment or bullying
- talk in confidence to any employees who may have evidence relating to the employee's alleged behavior and seek to obtain a written statement from them
- set up an interview with the employee alleged to have bullied or harassed a colleague, allowing them the right to be accompanied at the interview
- allow the employee a full and fair opportunity to answer any allegations against them and/or explain their conduct
- assess objectively whether the employee's conduct appears to have amounted to bullying or harassment
- adopt an objective and balanced approach to the information gained as a result of the investigation
- avoid allowing personal views about the employee to influence the overall assessment of the conduct under review
- keep confidential records of the investigation and ensure that these are handled in accordance with its data protection policy i.e., only as a physical print in the personnel file kept under lock

Wherever possible, DOF BirdLife will try to ensure that the employee complaining of harassment or bullying, and the alleged harasser are not required to work together while the complaint is under investigation. This could involve giving the employee complaining of harassment or bullying the option of working from home, where possible or remaining at home on special leave, if agreed.

In the case of serious allegations, DOF BirdLife may suspend any employee who is under investigation for harassment or bullying for a temporary period while investigations are being carried out and disciplinary proceedings are underway. Such suspension will be for as short a time as possible and will be on full pay. Suspension in these circumstances does not constitute disciplinary action.

As soon as possible following the conclusion of the investigation, DOF BirdLife will inform the employee suspected of bullying or harassment as to the outcome. DOF BirdLife will decide at that point whether it is appropriate to instigate disciplinary action against the employee, involving the employee representative.

Any disciplinary proceedings will, where possible, be conducted by a different manager from the person(s) who conducted the investigation.

# SAFEGUARDING POLICY (PSHEA POLICY)

## Definition

Prevention of and Protection from Sexual harassment, Exploitation and Abuse (PSHEA). The UN defines these as follows:

- **Sexual Exploitation:** Any actual or attempted abuse of 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:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Other forms of abuse than sexual abuse is not covered by this section on Safeguarding but are included in other sections of the DOF BirdLife's Behavior and Value Policies and Guidelines, including the section on Anti-corruption.

## Purpose

The purpose of this policy is to protect people, particularly children (see also Anti-child Labour Policy below), at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with DOF BirdLife. This includes harm arising from:

- The conduct of staff, personnel associated with or volunteers with DOF BirdLife
- The design and implementation of DOF BirdLife's projects and activities

## Scope

- All staff contracted by DOF BirdLife
- Associated personnel whilst engaged with work or visits related to DOF BirdLife, including but not limited to the following: consultants, volunteers, contractors, program visitors including journalists, celebrities, and politicians

This policy does not cover:

- Safeguarding concerns in the wider community and society not perpetrated by DOF BirdLife staff, associated personnel, consultants, volunteers, and contractors

## What is safeguarding?

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially vulnerable adults, and children, from that harm; and to respond appropriately should such harm occur.

## Policy Statement

DOF BirdLife believes that everyone we come into contact with, regardless of age, gender, disability or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. DOF BirdLife will not tolerate abuse and exploitation by staff, associated personnel, volunteers, contractors etc.

This policy will address the following areas of safeguarding [as appropriate]: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse.

DOF BirdLife commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

## Prevention

### DOF BirdLife responsibilities

*DOF BirdLife will:*

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its projects, programs and activities in a way that protects people from any risk of harm that may arise from their coming into contact with DOF BirdLife. This includes the way in which information about individuals in our projects, programs and activities is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff, associated personnel, volunteers etc.
- Ensure that staff receive training on safeguarding at a level commensurate with their role in the organisation
- Follow-up on reports of safeguarding concerns promptly and according to due process

### Staff responsibilities

*Child safeguarding*

DOF BirdLife staff, associated personnel, volunteers etc. must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional, or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

*Adult safeguarding*

DOF BirdLife staff, associated personnel, volunteers etc. must not:

- Sexually abuse or exploit at risk adults
- Subject an at-risk adult to physical, emotional, or psychological abuse, or neglect

### Protection from sexual exploitation and abuse

**DOF BirdLife staff, associated personnel, volunteers etc. must not:**

- Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

**Additionally, DOF BirdLife staff, associated personnel, volunteers etc. are obliged to:**

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by a DOF BirdLife staff member, associated personnel, volunteers etc. using the formal mechanism (see **Complaints policy and procedures** below)

## Enabling reports

DOF BirdLife will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the stakeholders that we work with.

DOF BirdLife will also accept complaints from external sources such as members of the public, partners, and official bodies.

## How to report a safeguarding concern?

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their line manager or CEO (see **Complaints policy and procedures** below).

If the staff member does not feel comfortable reporting to their line manager or CEO (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member or use the online complaint mechanism on DOF BirdLife's website (see **Complaints policy and procedures** below).

## Response

DOF BirdLife will follow-up safeguarding reports and concerns according to policy and procedure.

DOF BirdLife will apply appropriate disciplinary measures to staff found in breach of policy.

DOF BirdLife will offer support to survivors of harm caused by staff, associated personnel, volunteers etc. regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

## Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be always kept secure.

## Glossary of Terms

### **Beneficiary of Assistance**

Someone who directly receives goods or services from DOF BirdLife's projects/programs.

### **Child**

A person below the age of 18.

### **Harm**

Psychological, physical and any other infringement of an individual's rights.

### **Psychological harm**

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.

### **Prevention of and Protection from Sexual harassment, Exploitation and Abuse (PSHEA)**

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 associated 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).

### **Safeguarding**

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially vulnerable adults, and children, from that harm; and to respond appropriately when harm does occur.

### **Sexual abuse**

See p.16 above.

### **Sexual exploitation**

See p.16 above.

### **Survivor**

The person who has been abused or exploited. 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.

### **At-risk adult**

Sometimes also referred to as vulnerable adult. A person who is or may need care by reason of mental or other disability, age, or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

# ANTI-CORRUPTION AND IRREGULARITIES POLICY

## Introduction

DOF BirdLife's **Anti-Corruption and Irregularities Policy** describes DOF BirdLife's principles for preventing and managing corruption, fraud, and abuse.

The policy applies to DOF BirdLife in its entirety, i.e., all staff and volunteers as well as in relation to collaboration with national and international external partners and parties/entities, including local and national authorities abroad.

DOF BirdLife does not accept corruption, fraud, or abuse of any kind, not in the organisation itself, including our local branches, nor among contract holders with DOF, including international partner organizations.

DOF BirdLife works constantly to prevent corruption and is consistently monitoring and following up on corruption, fraud, and abuse in DOF BirdLife, in our international partner organizations in connection with grants/contracts as well as with DOF BirdLife contract holders in general.

DOF BirdLife acknowledges that our activities/engagements also take place in countries where corruption can be widespread due to social and economic conditions.

DOF BirdLife expects our international partners and other grant holders to do their utmost to avoid and prevent corruption, fraud, and abuse, but at the same time, we acknowledge that they may, involuntarily, be affected by the problem.

DOF BirdLife is of the opinion that prevention is the most important area of intervention. The objective is to reduce or eliminate any irregularities, including corruption, fraud, and abuse. If irregularities do occur, we will strive to reduce their consequences and ensure adequate and efficient follow-up, proportionate to the scope of the incident.

Prevention of corruption, fraud and abuse is closely linked to developing legitimate organizations, characterized by transparency and democratic control, this also applies to our international partners and in their respective countries of intervention.

The international partner organizations should establish structures to ensure that management and employees are held accountable, for example by their own board of directors, their members, and their target groups.

## Definitions

DOF BirdLife's basic understanding of corruption is "*the misuse of entrusted power and resources for private gain*" and covers both receipt of and provision of bribery and any other type of active or passive corrupt behavior.

“Private gain” includes family members and friends, personal and work-related networks, and platforms strengthening the power of the person(s) involved. Corruption is often, but not always, an illegal and thereby punishable act.

Misuse of resources can take many forms: fraud in connection with audits, deliverables not covered by an agreement, incorrect prices or faulty equipment, incorrect invoicing of staff or equipment, bribery or acceptance of gifts, misuse of resources, fraud in connection with business trips or official journeys, theft, etc.

Similarly, abuse of entrusted power can take many different forms: psychological, physical, or sexual harassment, discrimination, unauthorized access to privileges or arbitrary/unauthorized grants of privileges, abuse of power and relationships in recruitment processes, etc. (This is further described above in the Safeguarding Policy (PSHEA Policy) section).

## Corruption in practice

Since there is no all-encompassing/generally valid definition of corrupt behavior, DOF BirdLife has used the (non-exhaustive) list of definitions proposed by CISU as a point of departure, listing that corrupt and dishonest practice includes the following actions:

### **Fraud**

Fraudulent and deceitful behavior refers to deliberate actions committed by a person for private gain. This includes misrepresentations, extortion, conspiracy, collusion, fraud, nepotism and favoritism, theft, embezzlement, forgery and deceptive or fraudulent reporting of costs in relation to project or any other DOF BirdLife activities, travel expenses, daily allowances, etc.

### **Bribery etc.**

The act of offering payment exceeding usual rates in return for special favors or to speed up case processing is corrupt behavior and practice (bribery)

### **Misuse of resources**

Is the use of money and assets (e.g., procurement of equipment not intended for the project, failure to ensure secure storage of assets, private use of equipment, etc.) for purposes other than those mentioned in the application for funding for projects and activities as well as in general, and including negligent or inappropriate maintenance of assets

### **Serious irregularities**

This refers to inadequate accounting, delayed or no financial reporting to the DOF Board, partners and donors, waste in managing physical, financial, and human resources, as well as other types of neglect caused by poor management, etc.

### **Accepting and offering large gifts**

This refers to accepting and offering of gifts or favors that are not symbolic in nature, i.e., gifts other than pens, calendars, etc. Bringing and/or receiving minor gifts, such as cookies, scarves, etc. when visiting e.g., a partner country is acceptable, as this is a social convention. No person may, directly or indirectly, request or receive any kind of gift, service or other item of value given in return for work-related actions or omissions

or which affects - or seems to affect - the performance of his/her functions, duties, or judgement. This also applies to assets transferred to third parties (spouses/partners, children, etc.).

### **Concealment**

Concealment includes disguising or failing to disclose contract management aspects or potential conflicts of interest in collaboration with partner organizations, service providers, suppliers and business partners. This includes any attempts to conceal close family relationships, financial interests and other significant relationships.

## Definitions of suspicion, reasonable suspicion, and evidence of corruption

### **Suspicion of corruption may be based on:**

- Lack of adequate financial reporting in terms of time/deadline and form
- Complaints from members, local leaders, etc. that they have not received reported benefits
- Inconsistency between information from reports and testimonies from members, managers, etc. in relation to implementation of activities, meetings, events etc.
- Invoices/receipts etc. with a much higher cost level than usual for the same product/service

### **Reasonable suspicion of corruption may be based on:**

- Lack of documentation/evidence for alleged costs
- Corrections/crossing out or over by hand, different handwriting on documents/invoices/receipts etc.
- Pronounced difference/variation in signature from the same person
- Lack of valid signatures on lists for payment of per diems, etc.
- Strong indications that signatures or documents have been forged
- Plausible testimony from sources that are close to the "case"

### **Evidence of corruption:**

- Clear evidence of embezzlement or fraud, corroborating testimonies, confession by suspected practitioner of corruption, which is ready to be presented to the police and the judiciary.

## Prevention

DOF BirdLife must not contribute to corruption, bribery, or fraud, see above, neither actively nor passively. Irrespective of the local customary practice, DOF BirdLife will not compromise on our integrity.

At DOF BirdLife, we will not give, pass on, ask for or receive any gift or other favor, neither in Denmark nor abroad, if the gift or favor has more than symbolic value and if it can influence our impartiality or judgment.

DOF BirdLife's employees should actively avoid getting into a conflict of interest between a partner organization and DOF BirdLife. One conflict of interest can e.g., occur when the employee - or his close family member or friend – is a member of the partner organization or is employed/has a voluntary position in some form in the partner organization.

If one of DOF BirdLife's employees is facing a conflict of interest, or they are in doubt as to whether there is a conflict of interest, the employee must immediately inform his superior for clarification.

If a person employed by DOF BirdLife is aware that another employee of DOF BirdLife has committed corruption, it is his/her duty to inform the superior to the person who committed the corruption.

The informant will be guaranteed confidentiality, unless otherwise agreed with the informant. Procedures for complaining and reporting is described in the Complaints Policy and Procedures below.

If there is a suspicion of corruption committed by a DOF BirdLife employee, DOF BirdLife's CEO and donor will be notified immediately, and they will take the necessary decisions and steps in the specific case.

An employee who has committed illegal corruption with funds entrusted to DOF BirdLife cannot be employed by DOF BirdLife. It is the responsibility of the CEO of DOF BirdLife to ensure a well-functioning prevention of corruption and monitor the occurrence of any corruption and irregularity in DOF BirdLife.

## Prevention of corruption in relation to grants received from MoFA through CISU

Specifically in relation to grants received from MoFA, Denmark, through Civil Society in Development (CISU), there are similar specific guidelines that DOF BirdLife and DOF BirdLife employees must follow to the point in relation to anti-corruption and irregularities, being part of CISU's Code of Conduct (section 5.6). See: <https://www.cisu.dk/code-of-conduct-report-complaints>.

In the contract with CISU, DOF BirdLife guarantees with signature, that we comply with the anti-corruption provisions of MoFA, Denmark, and/or the EU. According to the guidelines for CISU's funding schemes, DOF BirdLife is responsible for reporting to CISU immediately if there is a reasonable suspicion of theft, fraud, corruption, abuse, or other irregularities, or if such matters have been ascertained in DOF BirdLife or in one of DOF BirdLife's partner organizations.

The detailed procedures for managing suspected and ascertained irregularities in connection with grants from CISU's funding schemes are also available on [www.cisu.dk](http://www.cisu.dk).

DOF BirdLife is loyal to employees, members, and volunteers as well as in the cooperation with partner organizations abroad, and individuals/partner organizations can safely seek advice and guidance when they have a suspicion or when they have ascertained an irregularity etc. Again, the informant will be guaranteed confidentiality, unless otherwise agreed with the informant.

DOF BirdLife actively try to prevent our partner organizations from contributing to corruption and bribery, whether actively or passively, and irrespective of the local conditions. This applies even if bribery etc. is a common feature of the local community and local customary practice.

DOF BirdLife works actively to communicate opinions, knowledge, and methods to prevent corruption, fraud, and abuse with a view to motivating and developing the capacity of partner organizations to take real action.

This work takes place by DOF BirdLife communicating knowledge, methods, and tools on preventing and combating corruption and fraud as well as pledging to give advice/follow-up closely in case suspicion is raised in one of DOF BirdLife's partner organizations both in relation to a current grant agreement and/or at the organizational level in the partner organization. This includes all relevant clauses regarding grant holder's obligations e.g., taking swift and appropriate action after detecting corruption, fraud, and abuse., also as per the CISU Code of Conduct, DOF BirdLife contracts with CISU and with partner organizations.

Therefore, when entering a contract between DOF BirdLife and partner organizations, both parties are obliged to undertake to manage the grant in accordance with the CISU guidelines for and the provisions of the MoFA, Denmark. This includes a duty to prevent and eliminate corruption, fraud, and abuse.

**The preventive measures implemented and agreed with partner organizations abroad by DOF BirdLife include:**

- That the partner organization abroad has an accounting system that covers the entire operation of the organization and is audited annually by a state-authorized/certified public accountant. DOF BirdLife has the right to receive the annual audit report of the entire partner organization's operations
- DOF BirdLife must ensure that in connection with each contractual collaboration with a partner organization, that detailed information has been prepared with tariffs for per diems, transport, accommodation etc.
- Furthermore, it should be stated in the cooperation agreement/contract with a partner organization abroad that DOF BirdLife has the right, but not the obligation, to participate in the recruitment process for staff to be employed in full or in part by the program/project. This can either happen by being physically present or by participating in job interviews online having received candidates' CVs, etc. well in advance. The goal is to ensure that hiring takes place from professionally justified criteria as well as to advise during the process. The selection is made based on a professional justification, DOF BirdLife does normally not oppose the partner's choice
- DOF BirdLife's employees must regularly carry-out financial assessments including review of the partner organization's accounting system and documentation during program visits and carry out random checks of invoices/receipts and any other type of documentation, i.e., by examining purchases and salaries in relation to local cost levels
- DOF BirdLife ensures that the entire partner's board is aware of the budgets and funding transferred from DOF BirdLife to the partner organization in question, and if DOF BirdLife deems it appropriate, the entire Board of Directors may be asked to sign the cooperation agreement. Additionally, DOF BirdLife is seeking to have contact information for key members of partner organization's Board of Directors/Executive Committee, just as the latter shall have contact information for DOF BirdLife's international program manager/officers
- The anti-corruption clause of CISU/MoFA, Denmark, is included in all cooperation agreements and contracts with partner organizations abroad

## Action in case of suspicion, reasonable suspicion, or evidence of corruption in relation to grants received from MoFA through CISU

**In case of suspicion of corruption:**

DOF BirdLife's employees take this suspicion seriously and investigate whether there is any evidence of the rumors or the suspicion.

Because DOF BirdLife's partner organizations are often less strong organizations, trivial disorder/clutter in accounts occur and it is important to distinguish between this and embezzlement. In cases of disorder/clutter in accounts, DOF BirdLife's employees must pay special attention to whether there has been actual corruption taking place, otherwise generally advise and support the partner organization to

bring order to their accounts, without a suspicious attitude. If it is a DOF BirdLife employee or volunteer who has the suspicion, DOF BirdLife's CEO is to be contacted immediately.

**In case of reasonable suspicion or evidence of corruption:**

DOF BirdLife will immediately freeze all payments on the program/project in question, which in practice means that no program/project funds can be paid to the partner organization abroad nor can money be used for any program/project activities. An investigation of the case is then initiated through a forensic audit (launched in collaboration with CISU if the case is in connection with a CISU grant), where evidence is secured by the hired forensic external auditor.

The partner organization is to a large degree involved in the investigation, depending on who in the partner organization the suspicion falls on and the partner's Board of Directors will be asked to testify and explain what initiatives the Board of Directors intends to take in relation to the case.

Once the case has been thoroughly investigated and it has been decided whether there is corruption or not – and the partner organization has expressed in writing what they intend to do with the case - DOF BirdLife's management team in consultation with DOF BirdLife's Board of Directors will decide whether the program/project will be terminated, or implementation/funding can be resumed.

If the partner organization has sacked the person(s) responsible for the corruption, funding/implementation may normally resume, however, it will be a burden for the partner organization if leading members or employees have been aware of the corruption without disclosing it to DOF BirdLife.

If no clear evidence of corruption has been found, program/project funding and implementation can be fully resumed pending decision by DOF BirdLife's management team (based on instructions and conclusions by CISU-hired forensic audit company if in connection with a CISU grant).

If the partner organization does not want to sack the person(s) responsible for the corruption, and there is evidence of corruption, the project is terminated, and the partner organization will usually cease to be DOF BirdLife's partner and all collaboration will cease. If there are serious grounds for suspicion of corruption, cooperation may also be terminated indefinitely.

The decision to suspend a program/project as well as terminating all collaboration with the partner organization in question will be taken by DOF BirdLife's Board of Directors. In case of reasonable suspicion of, or evidence of, illegal corruption, DOF's donor is notified immediately, and their instructions followed, e.g., in the case of a CISU grant.

DOF BirdLife consider it good practice and an organizational strength if a partner organization which inadvertently and unintentionally becomes involved in bribery or corruption is open about its experience and takes immediate steps to follow up on the matter.

All persons, members, or employees of partner organizations, who take contact to DOF BirdLife with a suspicion, reasonable suspicion, or evidence of corruption, will be taken seriously and guaranteed confidentiality unless otherwise agreed.

If the suspicion does not prove to be proven or not correct, no action will be taken against the informant. Procedures for complaining and whistle blower scheme is described in DOF BirdLife's Complaints Policy and Procedures below.

# COMPLAINTS POLICY AND PROCEDURES

This policy applies to all staff, volunteers, and any other individual officially representing DOF BirdLife. Other individuals performing functions in relation to DOF BirdLife, such as agency workers, contractors, partner staff etc. are encouraged to use and follow it.

It is important for DOF BirdLife that any fraud, misconduct or improper behavior by employees, volunteers etc. of the organisation is formally reported and properly dealt with. The organisation therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run. This policy sets out the way in which individuals may raise concerns and complaints that they have and how these will subsequently be dealt with.

## Background

DOF BirdLife provides protection for employees, volunteers etc. who raise legitimate concerns about specific matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by an employee who has a reasonable belief/suspicion that one or more of the following acts has taken place:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- concealment
- a breach of any of the policies contained in this DOF BirdLife's Behavior & Values Policies and Guidelines

It is not necessary for the individual to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief/suspicion is sufficient. The employee has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

The organisation encourages employees to raise their concerns/complain under this procedure in the first instance. If an employee is not sure whether to raise a concern/complain, they should discuss the issue with their employee representative, line manager and/or the CEO.

## Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees, volunteers etc. should be watchful for illegal or unethical conduct/behavior and report anything of that nature that they become aware of
- Any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation reported back to the employee who raised the issue
- No employee, volunteer etc. will be victimized for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern

- Victimization of an employee, volunteer etc. for raising a qualified disclosure will be a disciplinary offence
- If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures
- Maliciously making a false allegation is a disciplinary offence
- An instruction to cover up wrongdoing is in itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter to their employee representative and/or a Head of Department/CEO/Board member.

This procedure is for disclosures about matters other than a breach of e.g., an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the organisation's grievance procedure.

## Complaints or reports of unacceptable conduct in international interventions supported by DOF BirdLife

Complaints about unacceptable conduct in relation to interventions supported by DOF BirdLife must be filed and dealt with as close to the activity as possible. For instance, complaints from beneficiaries of international project/programs should generally be submitted to the local partner. If the partner is the reason for the complaint, the complaint should also be submitted to DOF BirdLife and vice-versa. DOF BirdLife therefore receives and deals with all complaints and reports regarding the organisation but may in some cases choose to deal with complaints or reports from both abroad beneficiaries, local partners and other stakeholders and intermediaries involved as well. That is of course particularly the case if the complaint is about a DOF staff person, volunteer etc. on international duty.

In connection with the implementation of international projects/programs, beneficiaries are made aware of rights in accordance with DOF BirdLife's policies as well as the right to and the possibilities and procedures for complaining.

The specific complaints instruction with the required minimum information and a format to support the process is made readily accessible on DOF BirdLife's website. This will be in Danish and English.

## Whistleblower scheme

DOF BirdLife will protect the identity of a whistleblower and make every effort to prevent retaliation. There will be no sanctions against wrong information, if the report proves to be incorrect. However, DOF BirdLife will take necessary steps against persons who are proven to have made false accusations and complaints. For example, DOF BirdLife may impose disciplinary measures against its own staff (like a warning, dismissal or exclusion), terminate contracts with grant holders and suppliers, file a police report in criminal matters or claim compensation for damage suffered.

## Filing a complaint or reporting unacceptable circumstances

Complaints, concerns, or suspicions should be submitted only via one of the email addresses listed at the top of page 2. Submissions will be processed only if they are non-anonymous, i.e., sent with a valid email

sender. While anonymous reporting is theoretically possible within DOF BirdLife, reports will only be processed if a name or email address is provided.

A short guide will be made easily accessible on DOF BirdLife's website, including a link to this document and the relevant email addresses (see page 2) for submitting complaints, concerns, or suspicions. The guide will be available in both Danish and English.

Internally, reports may also be submitted by contacting DOF BirdLife's Secretariat management, the Chair of the Board, and/or one of the two employee representatives, depending on the circumstances.

Reports may also be submitted through a trusted colleague or another relevant person. Guidance on submitting a complaint, concern, or suspicion can be obtained from DOF BirdLife's Secretariat management via direct contact (see top of page 2).

## Procedure

All complaints, concerns, and suspicions result in a case being opened and handled by DOF BirdLife. Cases are normally handled by Secretariat management (at least two persons) and, if the complaint concerns an employee, one employee representative. If the case involves Secretariat management, a Board representative is also included. If any of these individuals are involved in the complaint, an alternative management or Board representative is appointed.

The group (2–3 persons as described) ensures formal case registration. Initially, it assesses whether the case requires no further action and may be dismissed; any dismissal must be briefly justified. The Board must be informed of dismissed cases.

As a general rule, complaints must be registered one level above the person concerned. Complaints between junior Secretariat staff are received by both the department head and the employee representative. If the complainant is a department head or the CEO, the complaint is received by the CEO, the Chair of the Board, and/or another Board member. If the complainant is a volunteer or guest and no employee is involved, the complaint is sent to the relevant local chapter chair and another board member, with the Director copied.

Similarly, in volunteer-to-volunteer cases at DOF BirdLife ringing stations, complaints are handled by station managers and the CEO; the same applies to advisory committees. Board member-to-Board member cases are handled by the Chair and another Board member. If the case involves the Chair, the two Vice-Chairs are responsible.

The group (2–3 persons) will then:

- investigate and establish the facts and ensure a sound basis for decisions, considering all parties involved
- ensure that a police report is filed if the case is deemed sufficiently serious under Danish criminal law
- prepare a briefing note with findings and recommended outcomes and sanctions once the case is sufficiently clarified
- have Secretariat management assess the case and decide on sanctions if handled at Secretariat level

- if necessary, temporarily suspend involved employees or others during the investigation; similarly suspend cooperation with external partners, grant recipients (including payments), and suppliers

Additionally, the group will:

- monitor the case and ensure follow-up after a decision
- prepare a short final report within one month of receiving the complaint/report
- ensure documentation and maintain anonymized statistics; cases are stored in the management archive on DOF BirdLife's intranet
- ensure proper data storage in compliance with data protection laws, adequate anonymization, and deletion of relevant email correspondence
- ensure all cases are published in brief anonymized form on DOF BirdLife's website, including outcomes

Resources allocated for processing the report/complaint must reflect the nature and seriousness of the case.

Exceptions in case processing:

- If the report concerns irregularities/corruption already reported by a partner organisation, the case is handled under DOF BirdLife's administrative guidelines and relevant rules from the Ministry of Foreign Affairs of Denmark/National Audit Office (Rigsrevisionen)/EU and/or specific requirements from other donors.

Involvement of other parties in case processing:

- At least one employee representative (or a substitute) is always involved in cases concerning Secretariat staff
- The group may request information from anyone within DOF BirdLife
- In special cases, external experts may be engaged to ensure an impartial basis for decisions

## ANTI-CHILD LABOUR POLICY

The purpose of the anti-child labour policy is to ensure that no children will be subject to child labour through the activities, interventions, and work in the broadest sense of DOF BirdLife. Therefore, this anti-child labour policy applies to paid staff members, volunteers, and our partners, suppliers, consultants, and collaborators in the widest sense. Hence also applies to everyone who is involved in the projects and programs DOF BirdLife directly develops and runs as well as the projects and programs supported through partner organisations.

Child protection means ensuring that no children are exposed to any form of harm, whether directly or indirectly, intentionally or unintentionally, and thus has a much wider range than child labour per se, i.e., through secondary and spin-off effects of the work, interventions and activities that DOF BirdLife implements. The screening and safeguarding for potential negative impacts on children have to be employed from the formulation, planning and implementation of any DOF BirdLife activities.

The term child labour is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work. Whether or not particular forms of work can be called child labour depends on the child's age, the type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. According to UNICEF, roughly 138 million children were subjected to child labour in 2024. Over one third of them are in hazardous work that directly endangers their health and development.

UNICEF defines child labour as work that children are too young to perform or that – by its nature or circumstances – can be hazardous. Unlike activities that help children develop (such as contributing to light housework or taking on a job during school holidays), child labour causes harm to a child's health, safety, or moral development. UNICEF defines hazardous work as any type of work that, by its nature or circumstances, is likely to harm children's health, safety, or moral development.

DOF BirdLife has a zero tolerance for child labour. Child labour is therefore never accepted in any DOF BirdLife related activity, project or program, with collaboration partners or external actors. It is the responsibility of the DOF BirdLife leadership team to ensure, that all DOF BirdLife staff adhere to the anti-child labour policy. To clarify and formalize DOF BirdLife's zero tolerance towards child labour, and to hold partners accountable to the principle of fighting against child labour, all agreements with partners and sub-grantees must contain the clause, in which partners and subgrantees are made aware of and agree to the zero-tolerance policy: "The Implementing Partner shall abide by applicable national laws as well as applicable international instruments, including the UN Convention on the Rights of the Child and International Labour Organisation conventions. Any violation will be ground for immediate termination of the Agreement."

DOF BirdLife must be immediately informed if child labour of any kind is detected in any DOF BirdLife and/or DOF BirdLife funded programs and projects by using the above complaints policy and procedures. All collaboration with partners refusing or failing to adhere to these guidelines will be terminated/reviewed immediately.

## ANTI-TERROR POLICY

The Danish Ministry of Foreign Affairs requires that the anti-terrorism clause is implemented in all pooled funding schemes, including CISU. The anti-terrorism clause reflects a commitment to prevent any connection to terrorism and to comply with international sanctions. It emphasizes the seriousness of such matters, as breaches of these obligations may result in termination of the agreement and repayment of funds.

### **CISU's requirements for grant recipients and local partners:**

According to CISU's funding guidelines, it is the responsibility of the Danish organization to screen and ensure that local partners and others receiving grant funds are not listed on the EU and UN terrorist lists. Screening must be conducted against the EU and UN terrorist lists when selecting partners.

CISU has included the Ministry of Foreign Affairs' anti-terrorism clause in all grant contracts between CISU and the Danish organization. CISU also requires that the anti-terrorism clause be included in all cooperation agreements between the Danish organization and its partners in the partner country. This requirement is described in CISU's management guidelines for the various funds managed by CISU.

CISU disburses grant funds to the Danish grant recipient upon request. The Danish grant recipient then disburses funds to local partners.

### **CISU's requirements and oversight:**

The requirement for ongoing monitoring is stated in the grant letter sent along with the contract to all grant recipients. The grant letter refers to CISU's oversight tools, which include screening in relation to the anti-terrorism clause. CISU always checks that all clauses from the Ministry of Foreign Affairs are included in cooperation agreements during supervision of Danish organizations and local partners.

CISU actively monitors a selection of grant recipients—both organizations in Denmark and local partners. CISU has developed several supervision checklists used during inspections, which are used both for financial oversight and to assess accountability compliance in relation to the contract with CISU. CISU uses these checklists during its own supervision of grant recipients and encourages Danish organizations (grant holders) to use the checklists in their ongoing supervision of their local partners (the implementing organizations). CISU shares the checklists on its website, along with other resources for managing grants.

A fixed part of the oversight is checking that the cooperation agreement includes the anti-terrorism clause and identifying what procedures the organization has in place to ensure that there is no collaboration with parties listed on the EU and UN sanctions lists. The result of the oversight is documented in a supervision report. In connection with CISU's supervision of local partners, spot checks are conducted, and their financial systems and capacity are assessed. Documentation or reports from the Danish organization's ongoing supervision of local partners may also be collected.

## DOF's Anti-terror screening

DOF BirdLife screens partners, collaborators, suppliers, and others against the EU and UN terrorist lists using the following continuously updated links:

- **EU:**  
<https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eufinancial-sanctions?locale=en>
- **UN:**  
<https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list>