



# DSW

# SAFEGUARDING

REGULATIONS





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# SAFEGUARDING STATEMENT

Deutsche Stiftung Weltbevölkerung (DSW) is an international development organisation, which focuses on the needs and potential of the largest youth generation in history.

Our objective is to empower young people, especially young women and girls, by creating demand for and access to youth-friendly health information and services including modern contraceptives, and by securing their right to bodily autonomy.

With offices in Europe and East Africa, we achieve this through a combination of youth-oriented programmes and gender transformative advocacy that also champions for investments in research and innovation to fight poverty-related diseases.

DSW is committed to fair and equitable interaction across the organisation through a comprehensive set of safeguarding measures. We aim to protect the health, emotional, mental, and physical well-being and rights of every individual who is associated with DSW or involved in its projects and programmes, regardless of age, gender identity, disability, sexual orientation and ethnicity. This applies in particular to DSW employees and project beneficiaries, but also to associated third parties.

**With this statement we reiterate our commitment to safeguarding  
in all areas of our work.**

We are aware of our responsibility and therefore take preventive and interventional measures to protect the safety and well-being of all those associated with our work, especially children, young people and vulnerable adults. We are committed to promoting a safe environment where abuse, neglect and exploitation are not tolerated in any shape or form.

To make this a reality, we have developed a comprehensive set of tools to support DSW safeguarding in its implementation and contribute to a culture of fair and non-violent interaction. All employees of DSW undertake to comply with the Code of Conduct and its supplementary policies. They are informed in detail, made aware and trained accordingly when they are hired.

DSW invests in regular training for all employees to collectively raise their awareness of safeguarding, educate them about risks and signs of misconduct and unlawful acts, and inform them about ways to report concerns and incidents.

Any report of a suspected breach of the DSW Code of Conduct or a policy will be recorded and followed up.



To ensure that our safeguarding measures are in line with current standards and good practice, we continually evaluate our regulations, policies and safeguarding activities internally and through external consultation.

Creating an environment of trust, goodwill, and mutual respect in which all people feel seen, heard, and can flourish is a top priority for our work. Our safeguarding measures are in line with this priority and we are committed to promoting and protecting the health, rights and wellbeing of all those associated with DSW, its projects and programmes to the best of our ability.

Jan Kreuzberg  
Executive Director

Angela Bähr  
Deputy Executive Director

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Deutsche Stiftung Weltbevölkerung (DSW)

Hanover, September 2023

# DSW Safeguarding

Safeguarding at DSW includes all regulations, procedures, and activities as well as a specific working culture of mutual respect within the organisation, aimed at preventing harm to individuals due to their association with DSW. The following pages provide an introduction to the structure of DSW safeguarding.

In line with our international and intercultural approach to development cooperation, and in addition to protecting our employees, we particularly aim to prevent, detect and redress harm that may be caused to individuals by the behaviour of our employees or involved third parties – often shaped by a power imbalance - or by the design and implementation of our projects and programmes.

Within the structure of DSW safeguarding (see *Figure 1*), the regulations<sup>1</sup> with their basic provisions provide the foundation. The procedures<sup>2</sup> that are based on this foundation define the scope and design of the activities. These are, for example, training for staff, evaluations, and risk assessments as well as reports to the board. All this comes

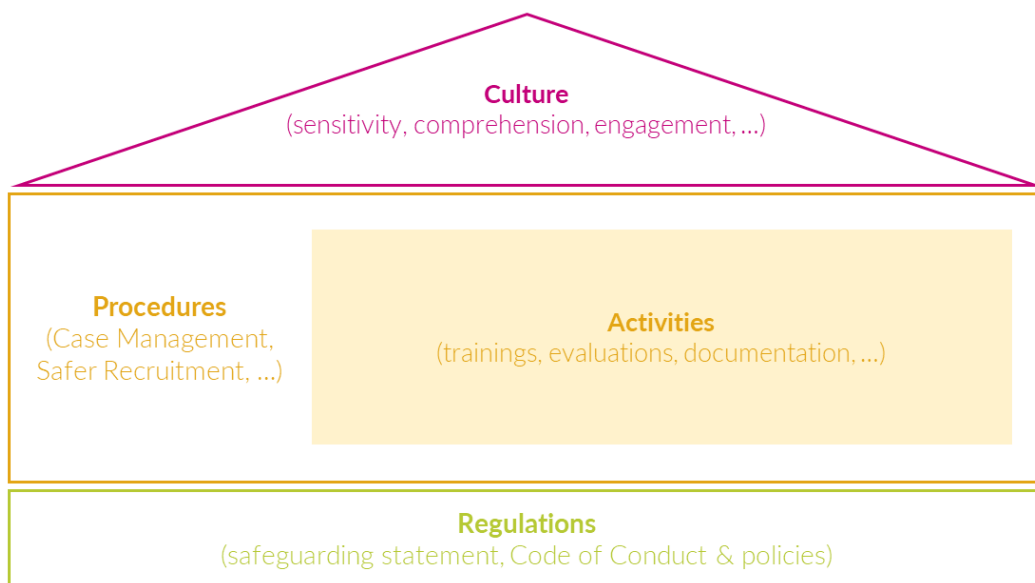


Figure 1: DSW Safeguarding Structure

<sup>1</sup> The regulations consist of this statement, the Code of Conduct and its supplementary policies. They are provided in German, English, Swahili and Amharic to ensure clear understanding.

<sup>2</sup> The procedures are internal guidelines in English only and include the Case Management Procedure, Safer Programmes Procedure, Safer Recruitment Procedure, Capacity Development Procedure and Procedure for Events and Visits with Youth Champions.





under the umbrella of a specific working culture to establish and maintain staff awareness, understanding and commitment to human rights and safeguarding. This culture both holds together the different aspects of DSW safeguarding and is itself sustained by it.

For further definitions and explanations of safeguarding, please refer to the glossary below.

## Three Areas of DSW Safeguarding

DSW safeguarding covers the following three areas: Prevention, Reporting and Intervention (*Figure 2*).

### Prevention

The area of prevention is the largest area within DSW in terms of its associated documents and activities. It includes in particular, but not exclusively, the following measures to prevent misconduct and unlawful acts:

- development and regular review of relevant safeguarding regulations and procedures,
- distributing the safeguarding regulations to all staff and ensuring their willingness to comply with these regulations by personal signature,
- providing adapted information material on DSW safeguarding to staff of partners and service providers, beneficiaries and their communities,
- risk-sensitive design and implementation of programmes and projects with the aim of minimizing harm in contact with DSW's youth target groups wherever possible (see also [Safer Programmes Procedure](#)),
- implementing safeguarding procedures in the selection and recruitment of new personnel (see also [Safer Recruitment Procedure](#)),
- regular training of all staff to promote understanding and awareness of safeguarding issues (see also [Capacity Development Procedure](#)).

### Reporting

Reporting involves DSW ensuring that all employees and persons with whom DSW has contact have safe and appropriate ways to report concerns and incidents (see also [Policy on Reporting Misconduct and Unlawful Acts](#)).

DSW strives to provide the best possible protection for any person who reports. In addition, anonymous reports can be made at any time.

## Intervention

Responding to a report involves first ensuring that DSW has a case-appropriate process for following up and, if necessary, sanctioning confirmed cases of reported misconduct or unlawful acts in a fair, proportionate manner (see also [Case Management Procedure](#)).

Maintaining confidentiality at all stages of the process of following up a report is vital in this regard. Information relating to the reported matter is securely stored by the head of case management during processing and subsequently by the executive directorate. Case-related and personal data will only be disclosed if necessary (e.g. when filing charges).

Those who have been harmed by the conduct of staff or the design and implementation of DSW programmes and projects are offered practical and psychological support by DSW. The decision on the scope and type of support is based on the needs of the persons concerned.

In addition, the area of intervention also includes any adjustments to DSW safeguarding that have become necessary as a result of a reported incident.

The contents of the three areas of prevention, reporting and intervention listed here are taken from the policies and procedures and do not represent an exhaustive list of measures. The provisions defined in the Code of Conduct and its supplementary policies and procedures shall be applicable.



Figure 2: The Three Areas of DSW Safeguarding.



## Commitments

DSW undertakes to comply with the provisions of the DSW Code of Conduct and its supplementary policies. Upon employment or commissioning, all persons working for DSW on a temporary or permanent basis, including directly employed staff, interns, volunteers and board members are informed about DSW safeguarding. By signing this document, they declare that they understand and will comply with these regulations. Furthermore, the DSW safeguarding regulations are part of every contract that DSW concludes with service providers, consultancies and agencies. By entering into the contract, these enterprises confirm that they will endeavor to implement the safeguarding provisions towards their employees that are working on behalf of DSW.

DSW reserves the right to take appropriate action under labour law against employees who violate the DSW Code of Conduct or its supplementary policies. If misconduct or unlawful acts by employees of partner organisations or contracted enterprises is reported, the report will be passed on confidentially and in an appropriate form to the management of the relevant organisation/ enterprise. Any potential implication on the partnership or contract with DSW will be assessed.

## Responsibilities

Upholding the DSW Code of Conduct and the supplementary policies is the responsibility of all [DSW employees](#). Moreover, by individual, fair conduct, they contribute to establishing and maintaining an environment conducive to preventing violations of the Code of Conduct or the policies as well as to promoting their implementation. DSW strongly encourages reporting of any concerns or knowledge of violations of the regulations. All reports will be taken seriously and will be followed up.

Additional responsibilities apply to DSW's management. The [executive and country directorate](#) jointly lead the development and implementation of the safeguarding regulations and procedures. They annually evaluate the safeguarding documents for up-to-date status and check that they comply with established standards and legal requirements. They are also responsible for providing an appropriate reporting system and for documenting reports. They are further responsible for informing and training all staff on safeguarding in general and the DSW's safeguarding measures in particular.

Together with the executive/ country directorate, the [leadership team](#) has a crucial role to play in further developing the safeguarding culture. They foster a working culture in their teams that respects the DSW principles and prioritises safeguarding by not tolerating any form of abuse, exploitation, and harassment and by showing personal commitment to DSW safeguarding.

Leading staff also ensure that sufficient financial resources are allocated in the respective team budgets for effective implementation of safeguarding measures. Ultimately, a leading staff have a responsibility under the **Case Management Procedure** to take steps to deal with a report when safeguarding concerns or incidents are raised with them.

In accordance with these regulations and procedures, compliance with specific provisions is also the responsibility of individual DSW **departments or divisions**.<sup>3</sup>

## Review

All DSW safeguarding documents shall be reviewed annually. Changes shall be approved by the executive directorate and communicated to all those who share responsibility for their implementation. If no revocation is received by the executive directorate within four weeks of notification, the changes shall be deemed accepted.

The executive directors will be available at any time to answer any questions about DSW safeguarding.

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<sup>3</sup> As an example, the responsibility for safeguarding briefing of new staff lies with the Human Resources and Administration Division and incorporating safeguarding measures in the programmes lies with the Projects and Programmes Department.



# Overview of DSW Safeguarding Documents

The following is an overview of all DSW safeguarding regulations and procedures. The Code of Conduct and policies can be found on the following pages as part of this document. They are handed out with every employment and can also be accessed digitally at any time or obtained in paper form from the DSW offices. The procedures are separate and provided by the executive or country directorate.



The **Safeguarding Statement** identifies the regulations, procedures and activities covered by DSW safeguarding and presents them in an overview. It also sets out the framework for the commitments DSW subscribes to in relation to safeguarding. At the end of the document you will find a glossary with definitions for all DSW safeguarding documents.



The **Code of Conduct** contains the essential principles and standards of conduct to which DSW is committed. Along with the supplementary policies, it is part of every employment and service contract concluded by DSW.



The **Policy on Reporting Misconduct and Unlawful Acts** represents a clear commitment on the part of DSW to deal with all reports of suspected violations of DSW regulations. It explains the available reporting channels and sets out the provisions regarding the handling of a report and the protection of the person submitting the report.



The **Policy on the Protection of Children, Adolescents and Young People** comprises those standards of conduct that DSW expects from employees in order to protect, in particular, children, adolescents and young people in the working context of DSW from misconduct and unlawful acts that might cause them harm. Its publication in an appropriate form shall also serve to familiarize minor beneficiaries and their families with the general principles guiding the protection of young people in the work of DSW.



The **Policy on Gender Equality** includes DSW's principles with regard to equality of all genders as well as a catalogue of actions to promote gender equality and equal opportunities in the work of DSW.



The **Social Media Policy** includes provisions to prevent the disclosure of confidential DSW information through the use of social media and to reduce the risks associated with employees directly associating their social media presence with DSW. It also includes general conditions for employees' personal communication about DSW on social media.



The **Case Management Procedure** serves as a guide for all persons involved in dealing with an alleged breach of the DSW Code of Conduct or a supplementing policy. This includes all steps taken to initiate, conduct and conclude the handling of a report.



The **Safer Programmes Procedure** identifies measures to mitigate potential risks that may arise from the planning, implementation or evaluation of DSW projects and programmes.



The **Procedure for Events and Visits with Youth Champions** includes steps in the preparation and implementation of events and trips with Youth Champions - especially those taking place abroad - to ensure the safety and well-being of young people.



The **Safer Recruitment Procedure** serves as a guide for all persons involved in DSW recruitment processes to integrate aspects relevant to safeguarding in the advertising and filling of posts.



The **Capacity Development Procedure** identifies measures to ensure that all employees are aware of the DSW's safeguarding commitments and how to apply them in their particular area of work. It also identifies measures to create a working environment conducive to raising concerns without fear of reprisal or discriminatory treatment.

# Glossary

Abuse *	Intentional act within the framework of a relationship of responsibility, trust or power with actual or threatened negative consequences for the safety, well-being or dignity of a person.
Bribery	Influencing another person by offering or providing money, gifts, benefits or other advantages.
Conflict of interest	Conflict between the personal interests of employees and the interests of DSW.
Corruption	Abuse of power or position to gain unlawful personal advantage, e.g. by bribery or abuse of office, which damages the financial interests of the organisation and undermines its integrity.
DSW management/ management of DSW	All DSW leading staff, i.e. executive directors, country directors, department and unit heads.
Exploitation*	Form of coercion or violence that damages the physical and/or mental health of a person for physical, sexual, financial, material or social purposes.
Fraud	Deliberate deception or misleading, e.g. by deliberately manipulating information, transactions or documents to gain an advantage.
Gender*	Socially constructed roles, behaviours, activities and characteristics that a particular society deems appropriate based on the gender assigned to a person at birth.
Gender equality	Equal rights and entitlements to personal, social, economic and cultural development and equal voice in civil and political life for all, regardless of gender identity.





Misconduct	Actions that violate applicable norms, rules or ethical standards, such as fraud, discrimination, harassment or violence.
Report	Transmitted information that indicates a potential breach of the DSW regulations.
Reporting system*	System of formal and informal notification channels that enables people to report concerns and incidents securely, and for the relevant agencies to track and respond to these reports.
Safeguarding taskforce	DSW internal working group dealing with the implementation, further development and evaluation of the organisation's safeguarding measures.
Sexual harassment**	Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that is intended or has the effect of violating a person's dignity.
Unlawful acts	Activities that violate applicable laws, rules or legal obligations, such as theft, copyright infringement, or breach of contract.
Vulnerable adults*	Persons over the age of 18 who may be at increased risk due to their dependence on others for services, meeting basic needs or due to the context, e.g. in humanitarian situations.
Whistleblower	A person who passes on his or her knowledge or suspicions of misconduct or unlawful acts.

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\* see Clear Global (2022): Multilingual Glossary for PSEA.

\*\* see United Nations (2017): UN Glossary on Sexual Exploitation and Abuse.



# CODE OF CONDUCT



The Code of Conduct sets out the key principles and standards of conduct DSW is committed to. Its primary purpose is to promote transparency, integrity, and a sense of responsibility within DSW and to create a common basis for actions and decision-making. It conveys the fundamental values of DSW and provides guidance to ensure that our work is always in line with our mission, our goals and internationally recognised human rights. Accordingly, it forms the basis for all DSW policies, positionings and procedures.

DSW expects all employees to have read and understood the Code of Conduct and to behave in accordance with its provisions. The Code of Conduct, along with the supplementary policies, is thus part of every employment and service contract concluded by DSW.<sup>4</sup>

## Principles

DSW's goals and values are rooted in a set of fundamental principles. They guide our work as a reference for the conduct of all employees and ensure that it is carried out responsibly and in accordance with DSW's mission. In addition, they serve to inform people outside our organisation about DSW's values and to promote understanding of our work.

**Integrity:** In carrying out our activities, we pursue the highest standards of accountability, efficiency, competence and transparency.

**Respect:** We treat all people with dignity and courtesy, valuing diversity and respecting cultural differences.

**Human rights:** We are committed to social justice and the fundamental rights, equality and fair treatment of all people.

**Zero tolerance approach:** We take a zero-tolerance approach with regard to

- sexual harassment, exploitation and abuse,
- bullying, racism and discrimination related to age, gender, sexual orientation, gender identity and expression, disability, religion or belief,
- fraud, bribery and corruption.

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<sup>4</sup> If required by their specific working context, country offices may add relevant aspects to the Code of Conduct. Such additions shall not affect the provisions set out in this organisation-wide DSW Code of Conduct. DSW respects national constitutions, legislation and their regulations.

**Safeguarding:** We promote the implementation of the DSW Code of Conduct and policies by contributing to a working culture that prevents misconduct and unlawful acts. We are committed to ensuring that everyone involved with DSW feels protected and that concerns can be raised without fear.

**Youth empowerment approach:** In our work, we focus on empowering young people in order for them to exercise their rights, especially with regard to their sexual and reproductive autonomy, as well as their socio-economic opportunities.

**Cooperation:** We work together to implement the mission of DSW and take care that projects, programmes, finances and the reputation of DSW are not jeopardised.

**Do no harm approach:** In all our actions and decisions, our greatest concern is to avoid harm and minimise negative impacts on people who are directly or indirectly affected by our work.

**Sustainability:** We prioritise environmentally conscious actions in our work to protect natural resources and preserve a liveable environment for future generations.

## Standards of Conduct

DSW's principles are reflected in standards of conduct set out below for the domains of 1) Conflicts of Interest, 2) Fraud, Bribery and Corruption, 3) Discrimination and Bullying, 4) Sexual Harassment, Exploitation and Abuse, 5) Data Protection and Handling of Classified or Protected Information, 6) Protection of DSW's and Natural Resources, 7) Alcohol, Drugs and Gambling and 8) External Communication.

### Conflicts of Interest

A conflict of interest arises when the personal interests<sup>5</sup> of employees compete or conflict with DSW's interests.

During onboarding or in the case of appearance of (potential) conflicts of interest<sup>6</sup>, all DSW employees submit a conflict of interest declaration (see *appendix*) to the DSW management. The disclosure of conflicts serves to achieve transparency in all decision-making processes and transactions. For this reason, any circumstance that could constitute a conflict of interest must be disclosed. Such disclosure is considered

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<sup>5</sup> The term "personal interest" includes both financial and personal interests of the employees/ and of persons (groups of persons) with whom they are associated, such as relatives, friends, associations, communities and societies to which they belong, debtors and persons to whom they are otherwise obliged.

<sup>6</sup> For instance, due to a new procurement process.



necessary, for example, when employees involved in procurement processes have a private relationship with or an economic interest in a company being considered for selection as a DSW supplier of goods or services.

Failure to disclose a conflict of interest may result in disciplinary action for favouritism, abuse of office or corruption.

Persons suspected of having a conflict of interest will be asked to make a written declaration to the executive/ country directorate.

## **Fraud, Bribery and Corruption**

DSW takes a zero-tolerance approach to corruption, fraud and bribery. We are committed to integrity and transparency in all our operations. We do not tolerate any actions aimed at obtaining unlawful financial or personal benefits and always comply with applicable, national laws and regulations.

To ensure transparent, fair and conscientious procurement, all DSW employees follow internal policies that govern the process for purchasing consumables and fixed assets and services. The process and the documentation of the related documents follow external policies of the donors and are checked in the final stage by the DSW finance department. In addition, step-by-step instructions are provided and explained to staff to ensure that the specifications of the procurement process are followed at all stages.

As a general rule, all employees of DSW are prohibited from soliciting or accepting any benefit<sup>7</sup> from any person (or group) doing business with the organisation without the permission of DSW management. However, exceptions may apply to gifts and hospitality under certain conditions.

### Gifts

In general, gifts offered to employees in their official position for DSW are considered gifts to the organisation and shall not be accepted without permission from DSW management.<sup>8</sup> To this end, they shall apply in writing to the executive or country directorate for permission to accept such gifts. Proper records will be kept of such requests, indicating the name of the person receiving the gift, the occasion and the nature and estimated value of the gift, and whether permission has been granted to retain the gift or other instructions have been given regarding its disposition.

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<sup>7</sup> The term "benefit" refers to almost anything of value such as money, gifts, commissions, loans, fees, rewards, offices, employment, contracts, services or benefits in kind.

<sup>8</sup> In addition to money and objects, this also refers to invitations to conferences, including the payment of hotel and travel costs.

Employees shall decline the offer if its acceptance may compromise their objectivity in the conduct of the organisation's business or may induce them to act against the interests of the organisation or acceptance may give rise to complaints of bias or impropriety.

There is a blanket permission to accept gifts that are of low value (less than 10 Euros or equivalent) the refusal of which could be considered impolite (e.g. guest gift) and materials handed out during attendance at a conference/seminar (e.g. sweets, promotional material, stationery).

### Hospitality

Hospitality refers to food or beverages provided for immediate consumption as part of an event, as well as entertainment offered at the same time. Hospitality is an acceptable form of business and social behaviour and does not constitute a benefit as defined above. However, employees must not accept lavish or frequent hospitality from (groups of) people with whom the organisation has a business relationship (e.g. suppliers, partners or donors) in order to avoid being placed in a position of obligation/ debt.

## Discrimination and Bullying

DSW has a zero-tolerance approach to any form of discrimination and bullying by its employees and will sanction such behaviour with disciplinary action. This includes any behaviour that is offensive, degrading, humiliating or derogatory, or any other inappropriate behaviour that does not respect a person's dignity.

We are committed to promoting a safe and secure environment in our work and will not tolerate any actions that jeopardise the safety or dignity of any person. DSW therefore expects all employees to:

- treat all people fairly and with respect and dignity,
- speak with courtesy and kindness, listen attentively and consider the well-being of others,
- not commit any form of violence, discrimination, bullying, harassment or other acts that cause physical, sexual, psychological or emotional harm,
- accept, reflect and consider any feedback on their own behaviour,
- understand what bullying, discrimination and harassment means, be able to recognise early signs, empower those affected by offering support and take necessary action to stop it.



Violent, harassing or discriminatory behaviour by staff, especially towards (young) beneficiaries and vulnerable adults, is unacceptable and will not be tolerated.

Unacceptable behaviour within this meaning includes but is not limited to:

- marginalisation and social isolation,
- intimidation, blackmail and threats,
- undermining of decisions taken and other abuse of positions of power,
- work-related harassment (unrealistic deadlines, meaningless tasks),
- verbal and non-verbal demonstrations of hostility, name-calling or personal attacks (e.g. the use of derogatory remarks, insults and nicknames),
- sabotaging the work of colleagues and undermining work performance.

## **Sexual Harassment, Exploitation and Abuse**

DSW condemns all forms of sexual exploitation, abuse and harassment and does everything in its power to prevent these offences, which are in complete contradiction to the values and goals of our organisation. If cases of sexual harassment, exploitation or abuse occur in the working context of DSW, we stand resolutely behind those affected and provide the best possible support, information and protection.

Consequently, DSW pursues a zero-tolerance approach towards all forms of sexual harassment, exploitation and abuse. It also prohibits all employees from having any sexual contact with children, adolescents and young people under the age of 18. Sexual exploitation and abuse are a form of gender-based violence.

DSW expects its employees to

- understand that sexual exploitation and abuse are human rights violations and therefore grounds for termination of employment,
- never engage in sexual activities with beneficiaries of DSW projects,
- not engage in sexual contact with children, adolescents and young people under the age of 18 (regardless of the age of majority or age of consent in the field). Being mistaken about the age of a minor is no excuse for such behaviour,
- not accept, solicit, participate in the "purchase" of, or profit from sexual services in the context of their work (e.g. on business trips),
- never take advantage of beneficiaries, especially women and minors, or put them in compromising situations,

- never exchange money, preferential treatment, goods, information or services for sexual acts or other forms of degrading, humiliating or exploitative behaviour,
- never act with minors in a way that could put them at risk of abuse by others.

While DSW considers romantic relationships and consensual sexual encounters to be a private matter for the parties involved, these types of relationships are discouraged in the workplace due to (suspicion of) favouritism, abuse of power, conflicts of interest and challenges with confidentiality, professional distance and judgement regarding the performance of duties. This is particularly true for relationships between staff working in the same department and those where there is a direct supervisor-employee relationship. All such relationships must be disclosed to DSW management in accordance with the Conflict of Interest Disclosure.

## **Data Protection and Handling of Classified or Protected Information**

All employees are informed about the requirements for handling personal data in accordance with the EU's General Data Protection Regulation (GDPR). They receive an information sheet when they are hired and confirm with their signature that they have read and understood the information.

Employees must not disclose any secret or protected information to other persons without authorisation. Adequate protection measures must be in place at all times to prevent the misuse or misappropriation of such information. Examples of misuse include the disclosure of information in return for financial rewards or the use of information for personal interests. Unauthorised disclosure of personal data is a breach of GDPR and may result in appropriate legal consequences.

## **Protection of DSW's and Natural Resources**

DSW's intellectual property is an important resource. All DSW employees have a responsibility to protect this resource. DSW property may not be used for private purposes.

We also strive to conserve natural resources, e.g. by ensuring that paper and energy are saved, that sustainable means of transport are preferred and that ecological and social criteria are taken into account when selecting service providers and suppliers.

## **Alcohol, Drugs and Gambling**

As a general rule, it is not permitted to drink alcohol during office hours. Exceptions may be made for special occasions or evening events. In these cases, employees should





ensure that they consume alcohol in moderate quantities and behave in an appropriate manner so as not to damage DSW's reputation.

Smoking is only permitted outside the office buildings.

DSW employees are not permitted to invite beneficiaries to consume alcohol and/ or other drugs.

Employees who, due to the consumption of alcohol or other addictive substances, are not fit for work and thus unable to fulfil their duties, will be temporarily released from their work and will be subject to disciplinary measures. If there is a reasonable suspicion of problematic alcohol/ drug consumption or an existing addiction, supervisors should address this in a confidential conversation with the person concerned, inform the executive or the country directorate and subsequently find a solution and/ or external support together.

Employees are prohibited from playing for money, betting or gambling with each other or with persons who have a business relationship with DSW. Gambling on the DSW premises is strictly prohibited.

## **External Communication**

In our external communication, we place particular emphasis on transparency, integrity and the protection of personal data. Press releases and social media serve as tools for us to disseminate statements and inform the public about our mission, goals and activities. We pursue open and honest communication and strive to convey our content in a clear and understandable way. In doing so, we always ensure that our statements are well-founded and verifiable.

Employees may only contact the press with the approval of the executive/country directorate or the head of Press Relations and Communications.

All persons depicted in DSW photographs and/ or video recordings will be informed about the potential use of the recordings in DSW print and digital media formats. Furthermore, the written consent of the person featured - and of a parent or guardian in the case of persons under the age of 18 - shall always be obtained prior to the use of these images.



# SUPPLEMENTARY POLICIES



# Policy on Reporting Misconduct and Unlawful Acts

This policy aims

- to encourage the reporting of concerns and incidents through the designated reporting channels,
- to express a clear commitment by DSW to deal with all reports of breaches of the DSW Code of Conduct or policies,
- to strengthen the commitment of employees to the DSW principles and standards of conduct,
- and to communicate that no one is taking a risk by making sincere reports of concerns and incidents.

The DSW management is committed to contributing to the effective implementation of the DSW safeguarding regulations by adhering to the requirements set out in this policy and the [Case Management Procedure](#). In doing so, it undertakes to ensure an orderly process for dealing with and, where appropriate, punishing reported misconduct or unlawful acts in a fair, reasonable and confidential manner.

All DSW staff share a responsibility to contribute to an environment conducive to honest and forthright reporting of breaches of the DSW safeguarding regulations. Any concerns must be able to be raised without fear of reprisal or discriminatory treatment.

DSW also encourages anyone who has reason to believe that employees are not acting in accordance with the DSW safeguarding regulations to report their knowledge. This applies in particular to cases in which, due to misconduct or unlawful acts in the work context<sup>9</sup>, the interests of beneficiaries, employees, third parties or the organisation itself are at risk.

This policy supplements the DSW Code of Conduct and is the primary reference for the DSW [Case Management Procedure](#).

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<sup>9</sup> The term "in the work context" on the one hand includes all physical and virtual spaces in which persons are active in the context of their work for DSW, and on the other hand all activities that they carry out in direct connection with their work for DSW.

## Whistleblower Protection

All persons who disclose information about a (suspected) violation of the DSW Code of Conduct or a supplementary policy contribute to the prevention or detection of damage and threats to the interest of the organisation, its employees, beneficiaries or third parties. DSW therefore encourages anyone who has reason to believe that DSW employees are not acting in accordance with DSW regulations to report their concerns or knowledge. All reports will be taken seriously, treated confidentially and investigated.

Whistleblowers should not have to fear any negative consequences for reporting in good faith (i.e. honestly and sincerely). This applies even if it turns out to be an erroneous report. Discrediting, threatening or harassing a whistleblower will be sanctioned and may have consequences under labour law.

## Scope

This policy covers all reports by and about (former and current) DSW employees, beneficiaries, partners, and service providers who are or have been in a direct or indirect employment relationship with DSW.

Misconduct and unlawful acts that DSW encourages to be reported include, but are not limited to:

- inflicting damage to property and belongings,
- breaches of health and safety standards,
- unauthorised use of public funds,
- fraud, theft and corruption,
- sexual harassment, exploitation and abuse,
- bullying, discrimination and intimidation,
- abuse of office and power,
- any other kind of criminal offence.

## Filing a Report

The DSW reporting system (Figure 3) provides three formal channels for communicating concerns and incidents.

1. Reports can be sent by E-mail either to the executive directorate or to an external person of trust. External persons of trust have expertise in safeguarding and know DSW well, but have an independent relationship with the organisation. They will forward the report (anonymously if requested) for processing. An external person of trust is assigned to each country office as well as to the European offices and can be reached via separate E-mail addresses (see contact details below). The persons of trust are appointed by the DSW safeguarding Task Force for a three-year term.
2. Reports can be sent directly to the DSW executive director (and the deputy director) via the e-mail address *complaints@dsw.org*. This reporting channel is intended in particular to enable persons who are not in an employment relationship with DSW to submit reports.
3. The website provides the third channel for reporting concerns and incidents. Via *www.dsw.org/en/safeguarding* information on DSW safeguarding can be accessed and reports can be made anonymously to the executive directorate.

In addition, reports can also be made personally to supervisors, the country or executive directorate or a trusted colleague at any time.

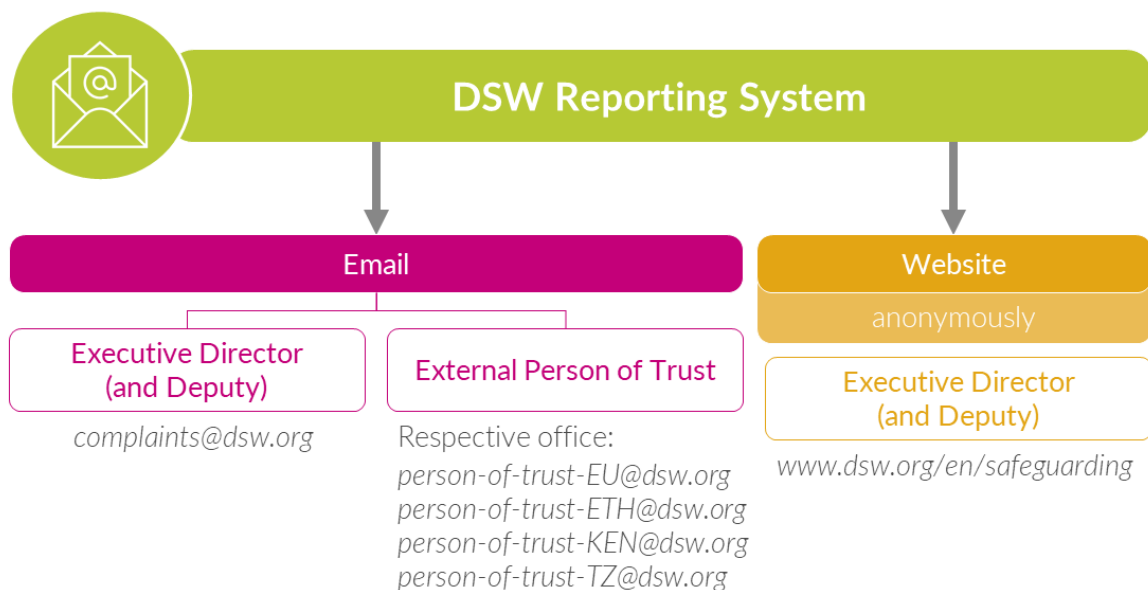


Figure 3: Overview of the DSW reporting system.

If a report concerns the country director, it should be addressed either to the external person of trust or directly to the executive director. If a report concerns the executive directorate, it should be addressed to the external person of trust. In such a case, the board will take over the role of the executive directorate in dealing with the reported incident.

#### Anonymous Reports

Concerns and incidents of misconduct or unlawful acts can be reported anonymously via the indicated online form on the DSW website. All reports received – from anonymous or identified whistleblowers – are taken seriously and appropriately investigated. In general, however, anonymous reports are often more difficult to trace than reports where the identity of the whistleblower is known. Therefore, DSW would like to encourage anonymous reporting only under special circumstances to facilitate adequate follow-up.

When making a discretionary decision on how to proceed with a report submitted anonymously, the following aspects in particular will be taken into account:

- seriousness/gravity of the situation described,
- credibility of the report,
- verification of the report by other sources within and outside DSW.

#### Erroneous Reports

If a reported suspected conduct cannot be substantiated by follow-up (erroneous report), the whistleblower shall not have to fear any negative consequences if the report was made in good faith.

However, DSW reserves the right to take disciplinary action against whistleblowers if it turns out that they have deliberately and intentionally made a false report.

### Actions upon Receiving a Report

The DSW **Case Management Procedure** deals with the handling of a report and its processing by DSW. It serves as a guide for all persons involved in the follow-up of an alleged violation of the DSW regulations and can be handed out by the Human Resources and Administration Department, the executive or country directorate if required. *Figure 4* provides an overview of the DSW case management process.

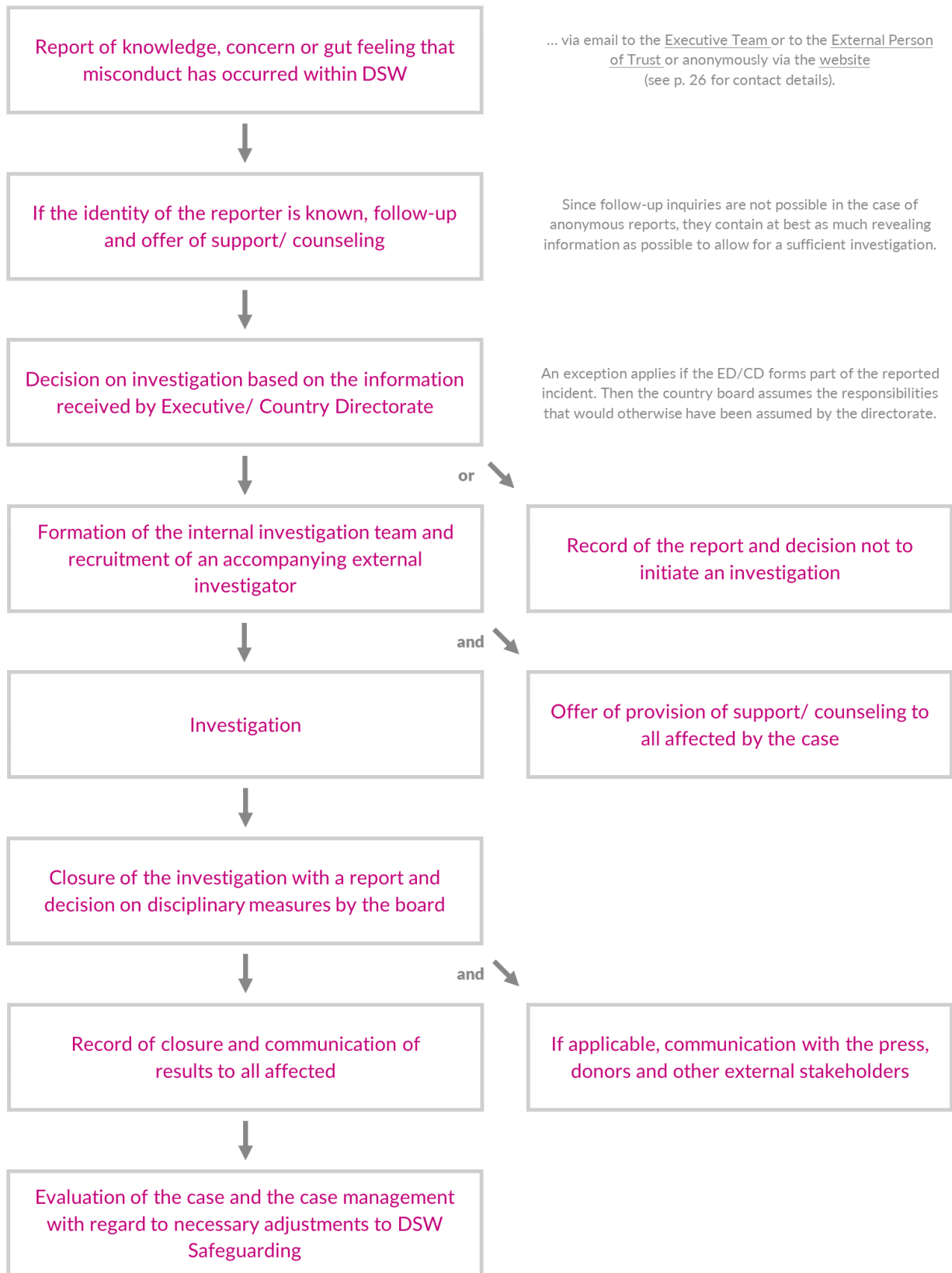


Figure 4: Overview of the DSW case management.

## Integrity and Confidentiality

All reports – their content and (if known) the identity of the whistleblower – are treated confidentially. In principle, without consent, the identity of the whistleblower and/or persons concerned will only be disclosed to those involved in following up the report. In the case of disciplinary proceedings, however, it may be necessary to disclose the identity to third parties (e.g. police). In such a case, DSW will ensure that the whistleblower and/or other concerned persons receive(s) (legal and psychological) counselling if requested.

Disciplinary and/ or rehabilitation measures of reported persons are decided on a case-by-case basis.

The documentation of a case management process will be deleted three years after its completion, unless a longer retention is required by law and proportionate.

As a matter of principle, the executive/ country directorate bears the responsibility for compliance with the requirements made in this policy, including the handling of reports and their follow-up. It shall report annually to the respective board on the reports received.





# Policy on the Protection of Children, Adolescents and Young People

This policy aims

- to protect children, adolescents and young people in the DSW working context from misconduct and unlawful acts that may cause them harm,
- to make DSW staff as well as children, adolescents, young people and their families aware of the general principles that guide the protection of minors and young people in DSW's work,
- to promote organisational good practice in ensuring that their programmes, projects, and employees do not place children, adolescents and young people at risk as well as responding appropriately to the reporting of concerns and incidents.

DSW asserts the right of all young people, regardless of age, disability, origin, religion or belief, gender and sexual orientation, to be protected from all forms of harm. For DSW, the welfare of the children, adolescents and young people with whom it works is paramount in all activities and decision-making.

It is our utmost concern to always carry out our work in a way that minimizes all risks to children, adolescents and young people. All DSW staff, by their individual behaviour, also contribute to the creation of an atmosphere of openness that supports the raising of issues or concerns and enables awareness of minors' and young people's concerns. They must be aware of their own responsibility for the safety and well-being of children, adolescents and young people and regard their protection as an integral part of DSW's mission and its practical implementation.

This policy supplements the DSW Code of Conduct and is a reference for the DSW [Procedure for Events and Visits with Youth Champions](#), [Safer Programmes Procedure](#) and [Safer Recruitment Procedure](#).

## Empowering Young People

Children, adolescents and young people have the right to express their views and opinions and to participate in decisions that affect them. DSW employees are explicitly

encouraged to promote and respect the autonomy of children, adolescents and young people in order to enable their needs to be understood and taken into account. Only when their voices and needs are paramount can a safer and more enabling environment be created in which they can flourish.

In the context of safeguarding, empowering specifically involves providing children, adolescents and young people with knowledge and skills to identify and respond appropriately to potential risks and dangers. This includes providing them with information about misconduct and unlawful acts appropriate to their age and educating them about how they can seek help or advice, or be supported in doing so, if needed. DSW employees who work with children, adolescents and young people are therefore required to explain their rights to them and to inform them about inappropriate behaviour and how to seek support if needed.

Accordingly, employees are also responsible for creating a safer and supportive environment within young people feel comfortable reporting concerns and seeking help. They should always listen carefully to children, adolescents and young people and respond to their concerns, if necessary by forwarding a report of suspicious cases to the executive/ country directorate.

Moreover, they must always take into account and respect the fact that young people have different needs depending on their age, gender, culture and other factors. They must never violate or restrict the rights and needs of children, adolescents and young people, e.g. to privacy and confidentiality.

### Leading by Example

All staff have a fundamental responsibility to act as good role models to young people and their colleagues in terms of appropriate behaviour and promoting the safeguarding culture. This involves being courteous and considerate in their dealings with each other and others, using respectful and non-discriminatory language and treating children, adolescents and young people with dignity and respect. It goes without saying that DSW demands equal treatment of all genders. There must also be no discrimination or different treatment or preference/exclusion of children, adolescents and young people based on other characteristics or factors. Furthermore, staff in their role model function must neither participate in nor tolerate illegal, dangerous or abusive behaviour.



## Protecting Personal Data

All DSW staff adhere to DSW's commitment to data confidentiality in accordance with the EU General Data Protection Regulation (GDPR). They are not permitted to pass on or publish protected information of children, adolescents and young people without permission. This also applies to photos and videos. It is important to respect both copyright and the rights of the person pictured.

Prior to any external communication activities, e.g. publication of film and photo recordings on the website, the consent of children, adolescents and young people involved must be obtained. Furthermore, they must be informed about the intended use of personal data and/or photographs and film footage, as well as about the right to refuse or later revoke consent. They must also be informed that the complete deletion of already published data and recordings is not possible.

Taking and sharing pictures of persons under the age of 18 is only possible with a written and signed declaration of consent by the parent or guardian.

Consent to the use of all or part of the material may be withdrawn at any time. DSW will then, to the extent possible, comply with the requests for modification or deletion of these postings.

## Misconduct and Unlawful Acts

In addition to the standards of conduct set out in the DSW Code of Conduct, misconduct and unlawful acts in relation to the protection of children, adolescents and young people that may result in disciplinary consequences include, but are not limited to:

- spending excessive time alone with children, adolescents and young people or inviting them to your home,
- beating children, adolescents and young people and otherwise physically abusing them,
- involving children, adolescents and young people in harmful practices, such as female genital mutilation,
- engaging in sexual relations with children, adolescents and young people under the age of 18 or beneficiaries,
- using inappropriate or offensive language,

- inappropriate or sexually provocative behaviour,
- acts intended to shame, humiliate, degrade or demean children, adolescents or young people or other forms of emotional or psychological abuse,
- exposing children, adolescents and young people to pornography or other sexual activities,
- employing children, adolescents and young people under the age of 18 or those who have not completed elementary education.



# Policy on Gender Equality

DSW recognises that achieving gender equality is not only upholding a fundamental human right but also a key driver of sustainable development. Multiple and intersecting forms of discrimination based on gender hinder individuals from participating in decision-making processes at all levels. For instance, women and girls often have unequal access to education and thus lack economic opportunities. Some are denied their most basic rights of self-determination and bodily autonomy, making them especially vulnerable to all forms of violence.

As long as this discrimination persists, DSW will focus its work on affirmative and protective action to avail interventions, which lead to equal opportunities for women and girls and other groups that face discrimination based on their gender identity, expression, or sexual orientation. Hereby, DSW also recognises the importance of involving men and boys in finding long-term solutions to the many faces of gender inequality and discrimination and considers their inclusion as vital for achieving gender equality, while recognising also the importance of 'safer spaces' where gender identities that might more frequently face discrimination can gather.

Our goal is to ensure equality for all people, regardless of their gender, race, disability status, age, sexual orientation, gender identity or expression or sex characteristics and to contribute to the elimination of all forms of gender-based discrimination and violence. We are therefore committed to promoting gender equality and empowering all individuals to participate fully and equally in all aspects of our work. We firmly reject all forms of discrimination, including discrimination based on gender.

This policy aims

- to reaffirm DSW's commitment to support reducing gender disparities within the societies in which DSW works,
- to promote women's and girls' empowerment and the empowerment of all gender identities in all their diversity that disproportionately face discrimination and to ensure sexual and reproductive health and rights for all,
- to strengthen our internal organisational systems, structures and processes to achieve gender equality.

The policy complements the DSW Code of Conduct and serves as a primary reference for the [Safer Programmes Procedure](#).

## Principles

When striving for realising gender equality, DSW specifically follows a set of guiding principles:

**Human-rights based approach:** We adopt a human-rights based approach by ensuring that “all human beings are (...) equal” is understood, respected and embraced by each individual staff member and integrated into all of DSW’s work.

**Diversity:** We acknowledge diversity by understanding that each individual is unique and respecting individual differences, including their gender identity and sexual orientation.

**Transformation:** We endorse structural transformation by addressing root causes of discrimination based on gender identity and/or sexual orientation.

**Participation:** We foster inclusion and participation by working with relevant stakeholders to design interventions and solutions that are sensitive to local structures and respond to beneficiaries’ and all stakeholders’ needs and concerns.

**Collaboration:** We seek internal and external collaborations to support exchange, learning, and knowledge generation on promoting gender equality.

## Actions

In line with these principles, we take actions at different organisational levels of DSW to mainstream a gender perspective and foster gender equality. Accordingly, the activities listed below are allocated to different operational areas.

- 1) Ensuring that all HR-related processes are free of gender-based discrimination. This includes aspects such as equal opportunities in hiring, promotion and compensation, as well as implementing measures to support work-life balance, e.g. flexible working hours and part-time work, to facilitate women's and individuals’ of all gender identity access to career opportunities.
- 2) Promoting diversity. We strive for a diverse workforce with equal representation of all genders through targeted recruitment efforts, promoting women and other groups of people who face disproportionate discrimination due to their gender identity in leadership positions and creating an inclusive work environment.
- 3) Providing awareness training on gender equality, women empowerment and gender bias to all employees. This can include workshops on gender-responsive



budgeting, mainstreaming gender in project planning and management or gender-sensitive language.

- 4) Taking a gender perspective into account in the development and provision of internal budgets, including resources for capacity development and gender mainstreaming activities.
- 5) Developing programmes with a special focus on ending the discrimination against women, girls and other groups of people who face disproportionate discrimination due to their gender identity and address the specific needs and priorities of different genders, taking into account the social, economic and cultural context of the target communities.
- 6) Integrating a gender-perspective into the design, planning, implementation and evaluation of all programmes and projects. This includes conducting gender analyses, setting gender-specific objectives and incorporating gender-sensitive indicators.
- 7) Using a gender-sensitive language in DSW's publications, press releases and other visibility activities.
- 8) Engaging in advocacy efforts to influence policy and institutional frameworks at national and international levels with regard to gender-responsive development policies and practices. This can involve participating in policy dialogues, contributing to research and knowledge sharing and gender-balanced participation in civil society working groups and public events.
- 9) Collaborating with local communities, civil society organisations and government agencies to promote gender equality and ensure the meaningful participation of women and other marginalized groups in decision-making processes.
- 10) Learning and sharing good practices. We foster a learning culture within DSW by documenting and sharing good practices, success stories and lessons learned on gender mainstreaming.

All actions must be tailored to the specific needs, cultural and political challenges, and opportunities of the countries, offices, and communities in which DSW operates. In addition, this policy may be supplemented by position papers on specific matters related to gender equality.

# Social Media Policy

This policy aims

- to prevent disclosure of confidential information of DSW via the use of social media,
- to reduce the risks associated with employees directly relating their social media presence to DSW,
- to set out a framework to maximise the expertise within DSW on using social media to build recognition and to achieve DSW's strategic ambitions,
- to reflect DSW's collective commitment to a positive online presence.

All DSW employees undertake to comply with this policy on all social media platforms. The policy supplements the DSW Code of Conduct.

## Respectful Interaction

In accordance with the DSW Code of Conduct and the organisation's commitment to the human rights, all employees must be respectful of others. Therefore, DSW does not tolerate any form of racism, sexism, bigotry (hypocrisy/mendacity), misogyny, explicit or implicit threats of harassment, physical harm or hate speech. DSW staff must not bully, harass or threaten anyone on social media or elsewhere.

Should bullying or harassment from outside be directed against DSW staff or the organisation in general, this can be reported via the DSW reporting system. All reports are treated confidentially and followed up immediately.

DSW is a politically neutral, non-party and non-religious organisation. Employees should not link DSW to their personal political or religious views in online content and interactions in a way that could lead to the assumption that the expressed political or religious views are those of DSW.

Intercollegiate contact on social media, e.g. through friend requests or follows, should always be well considered. They could be perceived as a form of harassment, especially if you yourself hold a higher position than the person you are contacting.





## Protection of Information

Social media must never be used to share non-public organisational or internal information with anyone outside of DSW. This includes, but is not limited to, financial information, including any type of information about donor relationships, changes in management or staff and future project launches.

## Transparency

When employees mention DSW on personal social media accounts, it is recommended that they disclose their relationship to the organisation, e.g. in their bio/ profile statement and to specify that “views are my own”.

## Intellectual Property and the Rights of Others

In order not to violate any trademark, copyright or other rights, images or other content may not be published without the consent of the owner of the media or the person(s) depicted. In the case of quotations, the source of the quotation will be named and, if possible, linked. If photos or videos of a private person are published on the internet, their consent must be obtained beforehand. Taking and sharing pictures or videos of persons under 18 years of age is only permitted with a written declaration of consent by the parent or guardian.

All photos in the DSW's internal photo bank have been approved for publication by DSW.

## Sense of Responsibility

In general, all employees are allowed and invited to share posts with photos, videos and/or quotes published by DSW on social media. However, *on behalf of DSW*, publications on social media are only made via the following official accounts of the organisation on Twitter (@dsw\_de, @dsw\_intl), Instagram (@dsw\_de, @dsw\_intl), LinkedIn (Deutsche Stiftung Weltbevoelkerung) and Facebook (@deutschestiftungWeltbevoelkerung, @DSWDeutscheStiftungWeltbevoelkerung).<sup>10</sup>

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<sup>10</sup> The country offices may have their own official accounts on social media, through which they publish posts independently.

In addition, some employees, for example due to their advocacy work in Berlin and Brussels, represent DSW on social media via their personal accounts and engage there with third parties on behalf of the organisation. They are aware of their representative function and act to the best of their knowledge in the interests of DSW on social media.

Finally, whenever publishing on the internet, everyone should always bear in mind that posts can be screenshotted or re-posted - regardless of own privacy and data protection settings. Everything published online can in principle be tracked.

# APPENDIX



# Declaration of Conflict of Interest

A conflict of interest arises when the personal interests of employees compete or conflict with the interests of DSW. The term "personal interest" includes interests of employees and of persons (or groups) to whom they are related, such as relatives, friends, associations, communities and societies to which they belong, debtors and persons to whom they are otherwise indebted.

A conflict of interest exists if employees of DSW have material or non-material relationships that are likely to influence the decision-making processes of DSW.

- *Material conflicts* of interest can be, for example, financial relationships with companies whose products and services directly or indirectly affect the work of DSW. Financial relationships include, for example, employment relationships, consulting activities, shareholdings, fees, assumption of travel expenses, support or other third-party funds.
- *Non-material* conflicts of interest exist, for example, if there are close personal ties to someone whose economic or idealistic interests are affected by DSW (partnership, family relationships, etc.).

I declare that there are no material or non-material relationships as defined above.

I declare that I have material or non-material relationships in the sense mentioned above. *Please specify:*

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-----

Name (in capital letters): \_\_\_\_\_

Date: \_\_\_\_\_ Signature: \_\_\_\_\_



# Declaration of Commitment

I have received the Code of Conduct of the Deutsche Stiftung Weltbevölkerung (DSW) as well as the following policies:

- Policy on Reporting Misconduct and Unlawful Acts,
- Policy on the Protection of Children, Adolescents and Young People,
- Policy on Gender Equality,
- Social Media Policy.

I have carefully read and understood the provisions formulated therein.

I undertake to comply conscientiously with the Code of Conduct and the policies of the DSW.

Name (in capital letters): \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_





## Imprint

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**DSW**

Deutsche Stiftung  
Weltbevölkerung

