

oikos

cooperação e desenvolvimento



| Policy statement on sexual harassment, sexual exploitation and abuse and child protection

PROTECTION

POLICY STATEMENT ON SEXUAL HARASSMENT, SEXUAL EXPLOITATION AND ABUSE AND CHILD PROTECTION

1. SCOPE

Oikos - Cooperação e Desenvolvimento bases its policies and practices on the Declaration of Human Rights, humanitarian principles of transparency, neutrality and impartiality and other relevant international human rights legislation, promoting equality, tolerance and social justice.

The activities of Oikos involves shared responsibility and cooperative efforts and facilitates solutions to ensure that all people enjoy the right to a dignified life in the context of sustainable development. Oikos acknowledges the importance of a responsible organisational culture for creating a safe environment for its employees, partners and the communities where it operates.

By recognising this it seeks to raise the awareness of the people with whom it works or collaborates in the framework of the organisation's activities of the importance of the current policy, and to help understand that such phenomena are common. Furthermore, communities where there is greater inequality and in more vulnerable groups, such as children, women and vulnerable adults, are exposed to greater risk of exploitation and sexual abuse. Oikos believes that all people have the right to live free from sexual harassment, exploitation and abuse, and no child should be the victim of any kind or form of abuse.

Oikos understands that there may be unequal distribution of power between employees, partners and third parties related to hierarchy and functions within the organisation, the external social environment of a country or the social context or the community. However, Oikos

expects that the power resulting from the position of an individual or group of individuals be not perceived or used as an advantage or an excuse for putting at risk the dignity of others.

Oikos has zero tolerance for acts of harassment, exploitation and abuse, including child abuse, perpetrated or encouraged by employees, partners or third parties linked to the organisation. All alleged misconduct and complaints must be properly investigated, and the necessary disciplinary measures taken and, whenever legally relevant, reported to the competent authorities and legal entities in the applicable jurisdiction. To this end, it will always seek to preserve the integrity and safety of whistle-blowers, should there would be a substantiated suspicion that they may be put at risk.

The activities of Oikos shall follow a victim-centred approach, based on the victim's needs and safeguarding their dignity, respect and privacy.

2. APPLICABILITY

This policy applies to all employees, partners and third parties related to the organisation's activities.

- 'Employees of the organisation' means all members of the Head Office, including all members of the Executive Management and of the different Departments, and the different Delegations in each country where the organisation operates.
- 'Partners of the organisation' means all entities who share activities and functions under a contract in the various projects and countries in which Oikos operates.
- 'Third parties related to the organisation's activities' means the

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volunteers, trainees, donors, consultants and other national or international entities other than those included in the aforementioned paragraphs.

This policy applies during and after contracted working hours. Any activity of employees, partners and third parties related to the organisation's activities performed outside contractual working hours that do not follow this policy will be considered a violation thereof.

3. DEFINITIONS

Child

A child means a person under 18 years of age, irrespective of the local laws and definitions of age of consent.

Vulnerable adults

All persons aged 18 years or more:

- Who are unable to look after or protect themselves from harm or exploitation;
- Who are possibly at risk due to gender, mental or physical health, disability, ethnicity, religious belief or practice, sexual orientation, economic and social status or as a result of conflict or disaster;
- Who are in a situation of subordination and limited power that puts them in danger.

Sexual Harassment

Sexual harassment means unrequited sexual conduct, request for sexual favours, physical or verbal conduct or gestures of a sexual nature or any behaviour of a sexual nature which can be understood or perceived to be offensive or humiliating to another person,

when these conducts call into question the work or create a relationship with employees of intimidation, hostility and offence in the work environment. Although it generally presents itself as a behavioural pattern, it may also be a one-off event.

Sexual Exploitation

Sexual exploitation means any attempted or actual abuse of a position of vulnerability, differential power or trust, for sexual purposes, including monetary, social or political gains obtained from the sexual exploitation of another person.

Sexual Abuse

Sexual abuse means the actual or attempted physical intrusion of a sexual nature, either by use of force or under coercive and unequal conditions.

Child Abuse and Exploitation

It may include one or more of the following:

- **Physical abuse**
Physical abuse occurs when a person causes suffering intentionally or threatens to cause suffering to a child. Examples of abuse are hitting, slapping, shaking, burning, pushing or restraining. Physical abuse occurs either as an isolated incident or repetitive behaviour and does not necessarily have to leave a visible mark or injury.
- **Emotional Abuse**
Emotional abuse is inappropriate verbal or non-physical behaviour towards a child or a long-term pattern that does not ensure emotional stability for the child. Such

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gestures are likely to harm the child's self-esteem and social skills.

- **Neglect**

Neglect means failing to provide the child with conditions that are culturally acceptable and considered essential for their well-being and physical and emotional development.

- **Sexual Abuse of Children**

Sexual abuse of children means involving a child in sexual activity that the child does not understand, has not given consent to, or is not sufficiently developed and prepared to give consent to, or that violates laws. Child sexual abuse is any form of sexual activity with a child, either between a child and an adult, or with another child who, due to age or development, is in a situation of responsibility, trust or power, in order to meet the other person's needs. Abuse that may or may not include touching or non-contact activities, coercion, inciting a child to engage in sexual activity, and using children for prostitution or other sexual practices, such as sexual exposure online, child pornography or using images of sexual content and exploitation.

- **Grooming**

Grooming means the behaviour that allows the offender to seek a child for sexual activity. It usually involves building trust with the child or their relatives, parents or legal guardians with the aim of sexually abusing them. It can involve encouraging romantic feelings or exposing the child to sexual concepts, such as pornography. It may involve future promises of courtship, marriage, monetary or representational gifts of

value and social status, to the child, their relatives, parents or legal guardians.

- **On-line grooming**

On-line grooming comprises sending e-mails with inappropriate content to the recipient, whom the sender believes is a minor, with the intention of getting the recipient to engage in or send sexual content with another person, who may be the sender or a third party.

Whistleblower

The whistleblower may be an employee of the organisation or a third party, either internal or external to Oikos, who reports, and delivers information, under the present policy, on sexual abuse and exploitation, including child abuse. The person exposes the activity which has come to their attention, or comes out in support of the victim, acting as their representative or assisting them in filing the complaint.

Reporting Person

Individual responsible for producing a report with the facts and evidence of the allegation and complaint filed, including hearing the victim(s) and the accused party(ies). The Reporting Person may be the hierarchical superior himself or someone previously appointed by Oikos or appointed by the hierarchical superior himself.

Immediate Supervisor

An individual who holds a position in the organization with hierarchical responsibility functions over the person concerned, entailing the establishment of a relationship of dependency of functions and accountability of the person concerned to the individual who holds said position.

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4. PRINCIPLES

In order to protect the most vulnerable groups, namely vulnerable adults and children, and to ensure the integrity of the organisation, Oikos adheres to the following principles:

- Sexual abuse and exploitation, including child abuse, carried out by employees or third parties in connection with the organisation's activities constitute serious misconduct and are grounds for terminating the employment relationship.
- Sexual activity with children is prohibited, irrespective of the age of majority or of consent that is locally applicable. The accused person may not invoke erroneous assumption of the age of the child.
- Employees and third parties related to the organisation's activities may not grant money, employment, assistance, goods or services in exchange for any kind of sexual activity.
- Without prejudice to the recognition of one's own identity and the free exercise of affective choices and sexual orientation and practice, exercised freely and with full consent, sexual relations between employees or third parties related to the organisation's activities and stakeholders in the projects are strongly discouraged whenever they are based on a framework of unequal power, which may harm the integrity and credibility of the organisation's mission.
- If employees or third parties related to the organisation's activities suspect or are concerned about possible sexual abuse and exploitation, including child abuse, being committed by another employee, they are expected to report such activities according to standard mechanisms and procedures.
- Employees or third parties related to the organisation's activities are expected to foster or ensure an environment which prevents sexual abuse and exploitation, including child abuse, and shall promote the implementation of this policy.



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5. COMMITMENTS

To ensure compliance with these principles, Oikos undertakes to:

- Develop strategies for preventing and responding to sexual abuse and exploitation, including child abuse, i.e. by incorporating such strategies in the terms of reference as objectives of the tasks to be performed (i.e. training, complaints, response mechanisms and progress reports).
- Conduct risk assessments to identify areas of risk and document the procedure for eliminating and minimising such risks.
- Include the policy on sexual abuse and exploitation, including child abuse, in the code of conduct, materials and training provided to employees or third parties related to the organisation's activities.
- Ensure that partnerships, arrangements and agreements include this policy, and that it is made clear that failure to promote measures to prevent sexual abuse and exploitation, including child abuse, failure to investigate or to report possible events, or failure to take corrective measures against sexual abuse and exploitation, including child abuse, shall be regarded as grounds for termination of contract.
- Regularly inform employees, third parties related to the organisation's activities or communities about measures to prevent and respond to sexual abuse and exploitation, including child abuse. This information must be developed and disseminated in collaboration with relevant agencies and shall include details on mechanisms and procedures, the status of investigations and monitoring of the measures set out.
- Foster support to communities and local authorities for the prevention and response to sexual abuse and exploitation activities, including child abuse, which employees or third parties related to the organisation's activities have engaged in.
- Ensure that mechanisms of grievance and redress are accessible to and understood by employees.
- Provide support and assistance to complainants of sexual abuse and exploitation, including child abuse, which may include medical treatment, legal assistance and psychosocial support, as appropriate, always taking into consideration confidentiality, cultural sensitivities and the safety of victims.
- In accordance with the laws in force, avoid employing or engaging sexual abusers and exploiters, including child abusers. Human Resources and hiring officers must ensure efficient recruitment procedures are in place for all staff, particularly those who will have contact with children (using criminal records, questions in the behaviour-based interview plan).
- Investigate allegations of abuse and exploitation, including child abuse, in a professional manner, using appropriate interview practices (notably with children). Involve investigators and experts as appropriate.

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- Take prompt and appropriate action against employees or third parties related to the organisation's activities who have engaged in sexual abuse and exploitation activities, including child abuse, which may include disciplinary measures, including legal action, taken in the country of origin and/or host country.
- Take appropriate measures to protect people who might face retaliation for reporting sexual abuse and exploitation, including child abuse, involving employees or third parties related to the organisation's activities.
- Ensure sexual abuse and exploitation monitoring and reporting systems, including against child abuse, are implemented in view of monitoring the effectiveness of processes and improving prevention and response.

6. RESPONSIBILITIES

All employees and third parties related to the organisation's activities

have a duty to ensure prevention and response to sexual abuse and exploitation, including child abuse. It is their obligation to follow the principles and commitments set out in this policy. All employees and third parties related to the organisation's activities who work in conjunction with the communities should also contribute to the monitoring of the policy based on the feedback of stakeholders.

Managers, supervisors and human resource managers

shall ensure that all employees and third parties related to the organisation's activities understand and follow this policy, and are responsible for recruitment and training. Human resource managers and supervisors are equally responsible for performance management for preventing sexual abuse and exploitation, including child abuse. Managers shall be responsible for verifying and ensuring that the investigation proceedings are conducted, followed by a report and disciplinary consequences.

Country coordinators or representatives

shall ensure that vulnerable adults and children are protected from abuse and sexual exploitation at the projects in the country of operation. Country coordinators should ensure that the policy is culturally embraced by the community, which shall develop mechanisms to implement and monitor its effectiveness. Including raising awareness of project beneficiaries and of employees and third parties related to the organisation's activities about the protection against sexual abuse and exploitation, including child abuse. Country coordinators must also ensure that complaints and investigation thereof are carried out, followed by the necessary disciplinary measures. Country coordinators are responsible for ensuring that victims receive the necessary assistance. Given the foregoing or pursuant to the law in Portugal or in the country where Oikos operates, any employees or third parties related to the organisation's activities who feel they are victims of abuse, sexual exploitation or child abuse **must report it to their immediate superior**, or in the case of conflict of interest, report to the next hierarchical level.

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7. FILING OF COMPLAINTS AND WHISTLEBLOWING

Whistleblowers should be able to file a complaint or report an event as easily as possible either **orally or in writing**, within a **period of up to 14 working days**. To this end, the reporting person shall have recourse to written correspondence, email, telephone calls, verbal communication, through third parties, among others, facilitating effective communication with the organisation, but providing **concrete**, preferably **verifiable information**, on the reported activity.

The response to the complaint filed shall not exceed **3 months from the date of the reported event**. In exceptional cases, Oikos may reply to a complaint after the end of this period if more time is deemed necessary due to the extraordinary complexity or difficulty in verifying the facts. If no reply is received within the time period stated, the reporting person shall be **informed of the progress made and the estimated date** for receiving the final reply.

7.1. Filing of Complaints and Whistleblowing at Institutional Level

Any employee who has a complaint or wishes to report any aspect of their work relationship is advised to take up the matter with their immediate superior, following the indications for the filing of complaints in this paragraph. When filing a complaint, the

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victim(s) and/or whistleblower(s) may bypass their immediate superiors, whenever these are involved in or offer some form of protection and/or concealment to the practice in question, or whenever there is a reasonable suspicion of conflict of interest:

- i. Which is likely to happen if the whistleblower believes that their superior is not the right person to address the problem that has given rise to the complaint (and may be either the harasser or discriminator or is protecting the harasser or discriminator);
- ii. Which is likely to happen if the whistleblower believes that the Country Coordinator or Country Representative has engaged in conduct leading to the complaint. The whistleblower should in this case report directly to the Director of Operations at the Headquarters of *Oikos - Cooperação e Desenvolvimento* in Portugal;
- iii. Which is likely to happen if the person reporting believes that the manager of the department who supervises their duties has engaged in the alleged misconduct, and in this case he/she should report directly to the Executive Director at the Headquarters of *Oikos - Cooperação e Desenvolvimento* in Portugal;
- iv. Which is likely to happen if the person reporting considers that the Executive Director has engaged in the alleged misconduct, and therefore he/she should report directly to the Board of Directors at the Headquarters of *Oikos - Cooperação e Desenvolvimento* in Portugal.

- v. If the Board of Directors of the Oikos Headquarters does not offer sufficient guarantee of independence against the Executive Director, the alleged misconduct shall be reported directly to the President of the General Assembly or the President of the Audit Committee of the Organisation.

7.2. Filing of Complaints and Whistleblowing at Community Level

Recognising the specificity of each case, context, project and country, *Oikos - Cooperação e Desenvolvimento* encourages beneficiaries and employees of local teams and delegations to file complaints. Any beneficiary who wishes to file a complaint about any aspect of abuse, sexual exploitation or child abuse that occurred during the course of a project should make use of the mechanisms put forward by the project or made available by the organisation for reporting misconduct:

- Direct contact and sharing with the Oikos Team and Delegation of the project concerned, which must be duly identified;
- Contact by email to the Oikos Team and Office of the project concerned;
- Contact by other means of communication made available by the Oikos Project Team and Delegation of the project concerned.

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8. NEEDS AND ATTENTION TO THE VICTIM

Oikos - Cooperação e Desenvolvimento considers that vulnerable adults and children have special needs and the attention given to them should respond effectively to these needs. Every victim is different and must receive case-by-case consideration, responding to different times and moments. This policy recognises that not all vulnerable adults and children will initially file a complaint or report misconduct as they may not feel ready to take action, but they may seek psychological or medical assistance or legal advice, even when they do not intend to file a complaint.

The process of giving attention and responding to the needs of the victim is complex, and involves respecting their wishes and capacity to take decisions, while ensuring that they are informed of their rights and duties, and of their freedom to make their decisions. However, it is essential that the victims and the people around them are aware of the means at their disposal to report alleged misconduct, especially in the case of minors under legally appointed guardians.

8.1. Initial Contact with the Victim

The initial contact is the starting point where victims seek support or answers, where they are reassured and comforted about the following procedure that may grant access to justice and, in many cases, the only opportunity to collect evidence and the

necessary information should the victim wish to file a complaint or bring legal proceedings in the future.

It seeks to protect the integrity of the victim, to safeguard and provide, if necessary, emergency support for the victim's health and physical and emotional integrity, as well as to gather the necessary information to better understand the event and the risk in order to respond and protect in the best possible way, with due respect for the victim's individual circumstances and timings.

Before anything else, the victims should be referred to the **competent authorities**, and taken to the nearest health centre and psychological support unit, if possible. Sexual abuse victims should be informed of the emergency medical support available, including contraception and prophylaxis of sexual infections, according to their wishes.

If the **sexual abuse is a recent event**, care must be taken when gathering the information, which must be treated as sensitive, all the while encouraging the victim not to change clothes nor bathe, and calling their attention to the importance of receiving medical and psychological support. Inform the victim of the steps to be taken in the event of filing a complaint or legal proceedings. If the victims have not followed the indications mentioned, the relevant authorities should be contacted.

8.2. Initial Interview with Victim

After ensuring that the immediate physical and mental health needs of the victim are met, the initial interview should be conducted in a safe and private environment in view of:

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- **Identifying the problem**, which is fundamental for addressing the victim's concerns appropriately. This will provide an overview of the type of violence they have suffered, the form, the scope, the consequences and possible risks. Whenever possible, specialist staff will be asked to identify the problem, according to the emotional state and situation of the victim. The identification of the problem should also include an appraisal of the resources available to the victim, such as a support network, a safe place to stay or a stable emotional state that will help the victim take free and informed decisions;
 - **Assessing and detecting risk**, in view of taking preventive measures to understand the level of risk and to recognise risk factors.
 - **Recording of events** based on the attached general form used for recording all types of events, allowing for identifying vulnerability factors: the victims' immediate needs, situations of discrimination, type of violence suffered, the abusers' characteristics, existing support networks, among others. This form will be used to ensure the organisation follows up on the event.
- respecting the silence, and being attentive to their emotions;
 - Listening in an active, empathetic and respectful way, without prejudice and stereotypes, considering the particular conditions of vulnerable adults and children according to their age, disability, social status, sexual orientation, creed, or any other situation of vulnerability or cultural and social norms;
 - Not expecting that communication will always be fluid and not doubting the account of the facts for that very reason; it is important to remember that sexual abuse and exploitation essentially attack the identity of the person, undermining their right to self-determination, affecting their psychic organisation and hindering their ability to communicate;
 - Allowing the victim to express their feelings and emotions (e.g. pain, cry, anxiety, shame, anger and fear), say words of encouragement to the victim, by acknowledging their courage in making a complaint or reporting the event, and offering protection. It is important to convey to the victim that they must not feel ashamed or guilty for the situation;

If the interview cannot be conducted with the support of specialised staff, appropriate communication given the circumstances must be conducted as follows:

- Giving credibility to the story, albeit subject to investigation, and making eye contact with the victim to provide reassurance and confidence;
- Taking the necessary time, without rushing or interrupting the victim,
- Clearly spell out the next steps, options and paths available, and the victim's rights; Facilitate the empowerment of vulnerable adults and child victims of sexual abuse and exploitation, and respect their decisions and timing;
- Bear in mind that many vulnerable adults (notably female victims) and children deny or play down the fact that they were victims of sexual abuse and

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exploitation, or do not fully understand the situation;

- Explain to the victim, if necessary, the danger they may be facing, reminding them that they are not alone, supporting them in their self-assessment and objectification of the situation they are in;
- Pay special attention to the body language used and avoid making any complaints or signalling disapproval or doubt in relation to the victim's statement;
- Avoid questions that show disbelief or prejudice about the victim's actions, which could be interpreted as a search for justification of the violent act such as "Why did you say that? Why didn't you?". Do not blame, downplay or justify the violence experienced by the victim;
- Avoid being angry or upset when the victim does not act or does not want to act in a certain way, and be careful not to judge their attitude, all the while managing the victim's expectations appropriately;
- Do not ask questions that the victim may not be able to answer (details on the circumstances of the event, such as clothes, the exact time, verbal interaction with the abuser, the victim's reactions, among others).



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9. INVESTIGATION AND FINAL DECISION

Oikos - Cooperação e Desenvolvimento will investigate all allegations of harassment as quickly and confidentially as possible. Everyone involved must act responsibly and truthfully in their allegations and in providing information for the investigation. The reporting person is informed of the complaint as soon as it is received and an Investigation or Investigation Committee is set up.

The **investigation opened** involves interviewing the complainant, interviewing the alleged abuser, reconciling the evidence (if any) and interviewing possible witnesses to the event(s). The whistleblower investigating officer shall investigate the complaint to the extent they deem appropriate, following the procedures mentioned.

9.1. Complainants and Whistleblowers

Oikos - Cooperação e Desenvolvimento seeks to promote a favourable but safe and confidential environment for the reporting of alleged abuse directly by the complainant or - internal or external - whistleblowers.

Complainant. Complaints may be filed by the victims themselves, as the complainant directly harmed by the abuse or violence caused by one or more individuals under the Organisation's activities (employee,

individual linked to a partner, service provider, donor, public authority involved in an Oikos project).

Whistleblower. The situation may be reported by a whistleblower - internal or external to Oikos - who appears as the victim's assistant or who gained knowledge of the situation by virtue of their functions and activities.

9.2. Investigation Process at the Headquarters

Where misconduct is reported to the Headquarters of Oikos, investigations shall be conducted by the line manager or Executive Director. If there are reasonable grounds to suspect that the line managers are unable to respond, another investigating officer, who is deemed impartial, shall be appointed.

9.3. Investigation Procedures at Delegations and Representations

If the alleged misconduct is reported to a Representation or Delegation of Oikos, the investigations shall be conducted by the Representative or General Coordinator or the Administrative Coordinator, with the knowledge of the Director of Operations and the Executive Director. If there are reasonable grounds to believe that these in-country officers are unable to respond, the Director of Operations will appoint another officer for the investigation.

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Where the complaint is referred directly to Headquarters, a person of recognised capacity is nominated by the Executive Director.

9.4. Investigation Results

After the investigation is completed, the appropriate measures will be taken to solve the problem detected. Under normal circumstances, if no conflicting information is found or if not absent due to work or holiday, the officer who received the complaint shall inform the complainant or whistleblower of the **final result of the investigation** in writing within 15 working days. If the complaint is sent to the Executive Director and/or members of the Governing Bodies, the final result of the investigation shall be communicated to the complainant, in writing, within 30 working days.

The **final resolution or result of the investigation** and the measures that must be taken shall be documented and communicated to the stakeholders in the situation, specifying whether there has been a violation of the Code of Conduct or not. In cases that constitute **serious violations** and, in accordance with the law, where the responsible person, the Investigation Committee or the organisation do not have the capacities considered necessary for the resolution or final result of the investigation of the complaint, the situation must be reported to the competent judicial authorities.

According to the **conclusion of the investigation**, the alleged sexual abuser or exploiter shall have the **right to be heard and the right to self-defence**, in order to avoid unfounded accusations, blackmail or bad faith. After the investigation is

completed, disciplinary action shall be applied to the employee who has been **found guilty of engaging in harassing conduct**, which may even result in dismissal for cause and even referral to the authorities. The whistleblower will be informed of the conclusion and result of the investigation as soon as possible.

9.4.1. Appeal against the Final Result

If the reporting person considers the **written decision to be insufficient or unfair**, the situation shall be referred to the Executive Director, or if the latter is a party to the situation, to the Board of Directors or, otherwise, to the Audit Committee. The complainant or whistleblower may formally appeal, in writing, to the next hierarchical superior. The appeal against the final result of the investigation shall take place within a **maximum period of 5 working days after the result has been received**.

The appeal should describe exhaustively the situation and the employee's previous attempts to amend it. Another Complaint Officer may conduct a new investigation to such depth as they consider appropriate to solve the complaint. Under normal circumstances, if no conflicting information is found, or in the event of being absent due to work or holiday, the officer who received the complaint shall send their final result of the investigation to the reporting person in writing within 30 working days.

After the internal appeal, the interim procedure is closed. However, the appeal may be sent to the judicial bodies in the country where the alleged abuse took place or, in the case of an employee in an employment relationship with Oikos, to the competent judicial bodies of the jurisdiction set out in the employment contract.

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10. FURTHER INVESTIGATIONS

The outcome of a complaint or alleged misconduct does not prevent *Oikos - Cooperação e Desenvolvimento* from conducting further investigations, whenever there is reason for believing that the abusive conduct was preceded by other events and there may be other silent victims in need of immediate assistance and repair. There is also the need to identify possible systemic weaknesses, of cultural and socio-economic nature or networks of engagement of employees or other stakeholders in abusive conduct, which call for reinforcement of internal surveillance and attention to prevention, reporting and remedy to the victims of abuse.

11. CONFIDENTIALITY

The current policy guarantees confidentiality of the situation. In some cases, complaints should be kept confidential to preserve the dignity of the victim, the safety of the complainant or whistleblower, or to maintain the integrity of a more comprehensive investigation under way. Third parties will be involved in solving the confidential complaints only on a case-by-case basis, subject to the consent of the victim and the whistleblower.

Anonymous whistleblowing is discouraged to prevent on-going investigations being undermined or reports being filed in bad faith. If the alleged misconduct or situation reported by the whistleblower cannot be investigated without identifying the latter, a director or supervisor will discuss the implications with the whistleblower and

decide whether to proceed or not with the investigation.

Complaints will be kept confidential to the extent possible, regardless of the means used to file the complaint, and the employee and whistleblower will not be subject to any kind of retaliation for filing the complaint.



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12. MUTUAL RESPECT AND PROTECTION OF SUBJECTS

All complainants or whistleblowers shall be treated with courtesy and respect by *Oikos - Cooperação e Desenvolvimento*. No stakeholder or whistleblower acting in good faith, such as directors, supervisors or employees, shall endure harassment, retaliation or on-the-job penalties for filing or taking part in the investigation of a complaint or whistleblowing. The promotion of acts of harassment, retaliation or labour penalties in the face of a complaint reported in good faith will be just cause for disciplinary action, including the possibility of dismissal with just cause.

The organisation expects complainants or whistleblowers to report and file their complaint in a correct and appropriate manner. *Oikos* reserves the right to modify or reject the complaint or whistleblowing procedure, due to abusive behaviour, immeasurable persecution and harassment of the subject of the complaint.

To ensure the protection of the innocent and guarantee the integrity of its employees or of third parties related to the Organisation, *Oikos* will take the necessary judicial or disciplinary measures - namely dismissal with just cause - whenever it can prove that the whistleblower acted in bad faith through:

- Slandorous accusations;
- Intent to blackmail or retaliate;

- Manifest malice or fake evidence; or
- Repeated delivery of false information.

Oikos - Cooperação e Desenvolvimento promotes ethical behaviour and encourages its employees to act respectfully, responsibly, with transparency, confidentiality and non-discrimination.

ANNEX

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ANNEX – FORM

A. General Information

	Record no.									
Place:	District/Municipality/Province:	Date:								

B. Details of Person Assisted

Name:				Age:		
Date of Birth:		Place of Birth:		ID number:		
Address:				Tel:		
Other accompanying persons when filing the complaint or reporting an event	No.	Name	Gender	Age	Organisation	
	1					
	2					
	3					
	4					
	5					
	6					

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C. Situation reported

Brief Description of Events:	
Name of Abuser (if known):	
Organisation they work for:	

	Yes	No	If yes, in which institution?	If no, why was a report or complaint not filed before?
Has a complaint been filed or alleged misconduct been reported before?				

D. Offices and Institutions involved

Clinical Centre	
Institutional Unit specialised in the matter	
Human Rights Protection Organisation	

E. Request for assistance or support

Brief explanation of the assistance to victims	
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F. Psychosocial Status

Physical and/or psychological health status before the abuse	Physical and/or psychological health status during and after the abuse	List health complications (if any)

The environment has been affected.		Acts of intimidation by the abuser.		Social pressure or fear of not filing a complaint or reporting alleged misconduct.		Fear of possible reprisal if complaint is filed or alleged misconduct is reported.	
Yes	No	Yes	No	Yes	No	Yes	No
Description:		Description:		Description:		Description:	

G. Vulnerability factors

What risks or threats are visible due to abuse?

Is there a risk to the victim's physical integrity?	Yes	No	If the answer is No, is there potential vulnerability to further abuse by the abuser?	Yes	No	Elaborate further:

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H. Support Network

Name	Employment status	Contact information	Address

I. Reaction Capabilities

What steps did the victim take to overcome the effects of the abuse (i.e. How did they survive)?	The ability of the victim to prevent abuse	Possible resilience strategies for the future



Oikos – Cooperação e Desenvolvimento is a Non-Profit Association, internationally recognized as a Non-Governmental Organization for Development. We believe in a world without poverty or injustice, where human development is equitable and sustainable at both local and global levels. For this reason, we have assumed the mission of eradicating poverty and reducing inequalities so that all people may enjoy the right to a dignified life.

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