

Integrity Policy

**Encompassing safeguarding, harassment,
exploitation, abuse, fraud and corruption**

September 2025

1. INTRODUCTION

At DCAF, we envision a world where democratic security sector governance advances sustainable peace and development and human dignity for all.

DCAF is committed to safeguarding all people who work with the organization and are impacted by the organization, as well as the integrity of the organization.

The Integrity Policy covers harm to individuals including harm caused by harassment, exploitation, abuse, and harm to the organization due to fraud and corruption. To this end DCAF has a zero-tolerance policy towards any forms of harassment, exploitation, abuse, fraud and corruption.

The Code of Conduct complements this policy by detailing expected behaviors and prohibited actions.

Violations of this Policy or the Code of Conduct (Appendix 2, page 11) may result in disciplinary action.

2. PURPOSE

This document outlines the scope and implementation mechanism of DCAF's Integrity Policy. It ensures that every individual working at or for DCAF:

- Understands DCAF's commitment to safeguarding, and expected behaviours,
- Is aware of their duty to report any suspicion of breaches to this Policy, and
- Knows how to appropriately respond to and report concerns related to harassment, exploitation, abuse, fraud and corruption.

This document also raises awareness amongst the public of DCAF's commitment to uphold integrity in all its programmes.

3. SCOPE

This Policy applies to all individuals working at or for DCAF including staff, volunteers, apprentices, interns, and consultants. This policy applies to all actions and behaviours occurring both within and outside the workplace, including professional events, company gatherings, conferences, training courses, and any other circumstances where actions and behaviours may have repercussions in the workplace in relation to safeguarding, harassment, exploitation, abuse, fraud and corruption. Staff are expected to adhere to the policy at all times whilst on field mission / duty travel. Implementing partners are also expected to align to this Policy.

This Policy is made available to corporate contractors and institutional partners when engaged in contracts, partnerships, or agreements with DCAF.

The people covered by this policy include all those listed above, as well as any external individuals, with particular attention to those who may be at increased risk, such as children and individuals facing discrimination or marginalization, including on the basis of gender, who may be harmed as a result of:

- The conduct of staff or personnel associated with DCAF.
- The implementation of DCAF's programmes and activities.

4. DCAF CORE VALUES

DCAF's Duty of Care is realized through the Integrity Policy and the Code of Conduct built on DCAF's Core Values of:

1. **Accountability:** We set clear objectives in a transparent and responsible manner. We use resources efficiently and effectively. We assume responsibility for our decisions, actions, and their consequences.
2. **Excellence:** We strive for professionalism and outstanding quality in all that we do. We take pride in our work and our reputation and are committed to continuous improvement by learning from our mistakes.
3. **Inclusivity:** We do not discriminate or exclude. Aware of implicit bias, we seek and enable everyone's contributions, listening and learning from others.
4. **Integrity:** We hold ourselves to the highest ethical standards, being honest, open, and fair. We proactively challenge misconduct and address conflicts of interest properly.
5. **Respect:** We act with consideration, courtesy, and kindness. We value and embrace diversity, challenging discourteous behavior and promoting a culture of respect.

5. DEFINITIONS

Integrity

Organizational integrity refers to DCAF's commitment to ethical principles and values in all its operations and partnerships. It encompasses safeguarding, harassment, exploitation, abuse, fraud and corruption.

Safeguarding

Safeguarding refers to measures aimed at preventing harm to individuals in the delivery of DCAF programmes.

Whistleblowing

The act of reporting suspected wrongdoing or the risk of wrongdoing by a person acting in good faith, with reasonable belief that the information reported is true at the time of reporting. Whistleblowing involves disclosure in the public interest.

Concern

Something directly seen or heard that suggests a potential breach of the Code of Conduct by a staff member. A concern is not confirmed or verified but signals the need for further investigation.

Abuse of power

Occurs when an individual abuses or misuses their power and discretion for personal benefit, or for the benefit of another person. Abuse of power, for the purposes of this Policy, includes situations involving a minor, situations that involve a reporting relationship, or any situation that includes an accusation against an individual who is employed by DCAF.

Victim-centered approach

An approach through which the immediate safety, needs, rights, and well-being of victims are prioritised in all safeguarding efforts.

6. POLICY IMPLEMENTATION

6.1 Prevention

Work-related issues and conflicts inevitably arise in the workplace. These can be resolved if they are dealt with quickly and before they escalate and/or qualify as harassment. The Mechanism for Work-related Issues provide clear guidance for resolving such workplace grievances¹.

Prevention is the fundamental pillar of the Integrity Policy and encompasses both individual and organizational responsibilities. **Each employee is responsible for ensuring that the working environment is free from any form of harassment, exploitation, abuse, fraud and corruption.**

All staff must:

- Uphold the Integrity Policy and the Code of Conduct.
- Prevent, report, and respond to any behaviour they observe that could resemble a violation of this Policy.
- Sign the Integrity Policy and the Code of Conduct (see Appendix 2).
- Organizers of workshops, conferences, training courses must ensure participants are aware of the Integrity Policy and the Code of Conduct.
- Complete an Integrity e-learning course before the end of their probation period, with refresher course every two years.

Line Managers must:

- Ensure that staff are aware of, understand, and comply with the Integrity Policy and the Code of Conduct.

Human Resources must:

- Make available up-to-date training resources for all staff.
- Ensure the Integrity Committee members receive the necessary support and training, including for cases and investigations management.
- Ensure thorough screening during hiring processes through reference and background checks.

1: Mechanism for resolving work-related issues

Leadership must:

- Model ethical behavior and promote an active bystander culture.
- Ensure confidential handling of allegations and support a victim-centered approach, including protecting whistleblowers from retaliation.
- Hold ultimate responsibility for implementing the Integrity Policy.
- Ensure integrity is embedded into the organization's strategy and governance processes.
- Define and resource appropriate work plans and procedures to operationalize the policy, monitor, and report on compliance.
- Periodically raise awareness about the importance of reporting potential breach of integrity concerns and/or complaints and assess if further awareness raising is necessary.
- Delegate specific tasks to the Integrity Committee and require regular reporting from them.

Organizational commitments

In addition to individual responsibilities, DCAF commits to fostering an integrity based organizational culture through implementing the following measures:

Integrating integrity into existing processes:

- Integrity related risks and mitigation measures are included in the Corporate Risk Register, regularly monitored, and updated.
- Due diligence is applied to contractors and implementing partners.
- Integrity-related considerations are embedded in the design of every programme.

Communicating commitments towards integrity and reporting channels:

- DCAF commits to communicating its integrity commitments, zero-tolerance policy towards harassment, abuse, exploitation, fraud and corruption and reporting channels to all internal and external stakeholders. This will be done through the website, employee communications, and targeted sensitization materials, with specific attention to making these materials available to DCAF country offices.

Continuously learning and improving to reinforce the implementation of the organization's commitment towards integrity:

- Lessons learned from complaint management and investigations will be integrated into policy updates and preventative strategies.
- Feedback on the effectiveness of the Integrity Policy and its implementation will be collected especially regarding awareness-raising, whistleblower protection, reporting, and investigation mechanisms.
- The policy will be posted and accessible on DCAF's intranet and external website.

6.2 Reporting

Who can report

A concern or suspicion of a breach of this policy can be reported by anyone directly impacted, a witness, or someone who has reasonable grounds to believe such a concern exists. Reports can be made by individuals either internally or externally to DCAF.

Reporter protection (victim and whistleblower):

- **Non-retaliation:** DCAF strictly prohibits retaliation against anyone who reports a concern in good faith or participates in an investigation. Any form of retaliation or adverse consequence resulting from reporting should be reported through channels available under the Integrity policy and will be treated as a serious policy violation leading to appropriate disciplinary action.
- **Confidentiality:** All reasonable steps will be taken to protect the identity of stakeholders involved, including the reporter. Information will only be shared on a need-to-know basis with individuals directly involved in the investigation and resolution of the case. While every effort will be made to ensure confidentiality, this cannot be fully guaranteed, in the event of a request from an authority and/or court.
- **Anonymous Reporting:** The option for the reporter to remain anonymous is available. But they are encouraged to reveal their identity while reporting as they can potentially facilitate an investigation and a proper follow-up.
- **Transparency:** reporter will be informed of the timeline for handling their report, how it is being addressed, and the conclusions of any investigations, as well as the possibility to appeal.

How to Report a Concern or a Complaint regarding Integrity (harassment, exploitation, abuse, fraud and corruption)

- **Staff members** should report immediately through one of the following channels:
 - Their line manager.
 - Any other appropriate staff member, such as a senior manager or a member of the HR team².
 - Members of the Integrity Committee (see DCAF Home for contact details).
 - DCAF's Integrity Reporting Platform³.
- **Non-staff members** should report through the DCAF Integrity Reporting Platform. They can also report to DCAF Staff, who must channel the report to the Integrity Committee or use the DCAF Integrity Reporting Platform. If in doubt, they should consult internal or external Persons of Trust (see below).

Reports can be verbal or written. In any case, as much information as possible should be provided. This will be detailed on the DCAF Integrity Reporting Platform and the FAQ.

2: Representatives of the HR Team or the hierarchy must intervene ex officio in the event of a violation of the present rules and regulations.

3: an ISO 27001-certified platform with military-grade encryption and strict privacy controls where no IP addresses, location data, or device information will ever be stored

Additional considerations on reporting

- **Internal and external Persons of Trust:** can be approached for confidential discussions and support. They can advise employees on the various reporting options available⁴. They cannot report, and they will not receive investigation or case reports.
- **Malicious Reporting:** The DCAF Integrity Reporting Platform is based on good faith. All reports will be looked at very carefully in order to assess if the allegations should be investigated. If during the assessment or later during the investigation, it is concluded that the reporter intentionally made false allegations and/or knowingly submitted misleading information, this will be treated as a serious violation of DCAF's Code of Conduct, potentially leading to disciplinary action and/or legal consequences.
- **Triggers for investigation:** In addition to receipt of reports, the Integrity Committee can exceptionally initiate an investigation if a problem is observed or there is 'reason to know or suspect' misconduct or violation of the Integrity Policy or anomalies are discovered by audit and compliance reviews.
- **Presumption of innocence:** In all cases DCAF abides by the principle of 'presumption of innocence' with regards to the accused / alleged perpetrator.

6.3 Response

All actions will be taken confidentially, impartially, and will follow a victim-centered approach, with a risk assessment conducted for all individuals involved.

The decision to investigate will be taken following an initial assessment by the Integrity Committee or Designated Person(s)⁵ as to whether the threshold for investigation has been reached. If the decision is taken not to investigate, the reporter must be notified in full. If a decision is made to investigate, it will be carried out by competent investigators with the oversight of a Committee Member. Conclusions will be reviewed by the Integrity Committee and /or the Designated Person(s) and reported to the Director with recommendations for decision making.

Specific measures may be taken to protect the employees/the parties pending the conclusion of an investigation, in particular: suspension, remote work and suspension of IT access.

A breach of the Integrity Policy and the Code of Conduct may result in administrative or disciplinary action proportionate to the gravity of misconduct. If the breach constitutes a criminal offence against DCAF, it will be referred to the relevant authorities.

In cases where complaints are justified or actual harm has occurred, affected individuals (victims) will be supported by DCAF. The appropriate support will be decided on a case-by-case basis, guided by the principles of a victim-centered approach, proportionality to harm, and the severity of the issue.

4: A Person of Trust is bound by confidentiality in all circumstances, subject to the express authorization of the person seeking advice.

5: Appointed by the Director in the event that report concerns a member of the Integrity Committee or the President of the Foundation Council. Where the report concerns the Director, the President of the Foundation Council will appoint. The individual(s) will be external independent expert(s) that report directly to either the Director or President.

Indicative Timeframe: The Committee should confirm receipt following an initial assessment of the report within 3 working days and will confirm next steps within 5 working days. Investigation will be undertaken as expeditiously as possible recognizing the duration will be dependent on the nature and complexity of the case. The Director's decision should be taken within 5 working days of receipt of the investigation report and recommendations from the Integrity Committee. This timeframe will be longer should the Director require further clarification from the Committee or additional consultations with experts.

6.4 Appeal

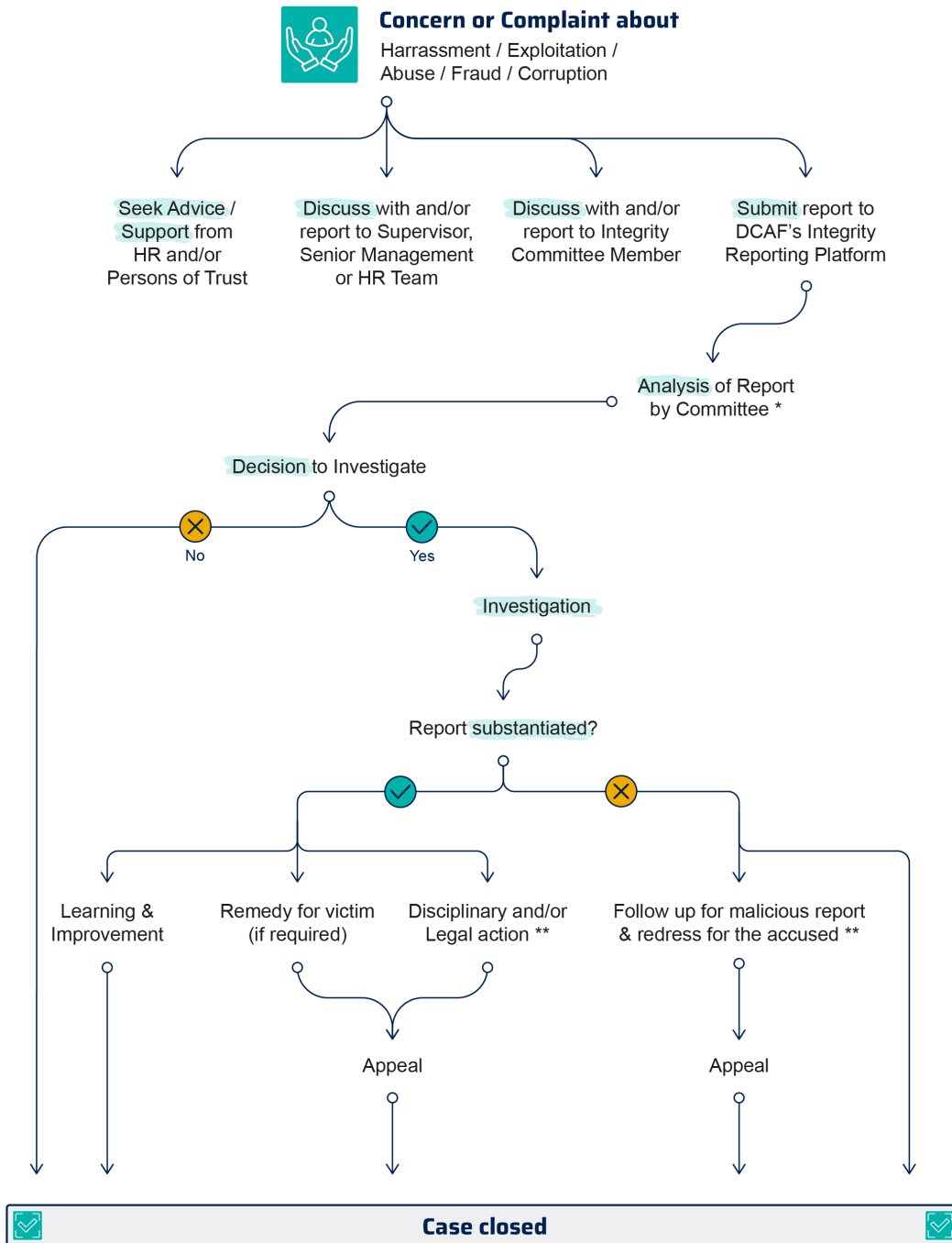
If either party (alleged victim and accused/alleged perpetrator) is dissatisfied with the decision or actions taken, they may file an appeal within 30 days of notification. The appeal will be conducted by an independent panel appointed (to be set up within 5 working days of appeal) by DCAF Director to ensure impartiality. The panel will review the details of the case, investigation process, and grounds for appeal before making a final determination.

7. APPENDICES

1. Process Infographics: Integrity at DCAF
2. Code of Conduct
3. Mandate of the Integrity Committee
4. Terminology

Appendix 1: Process Infographics

INTEGRITY AT DCAF: HOW IT WORKS



* For allegations against an Integrity Committee Member, the Director or President, a Designated Person is appointed to investigate. The appointment will adhere to the principles of Conflict of Interest.

** Disciplinary Action can include 1) written warning with improvement plan, 2) warning with threat of dismissal & 3) Dismissal.

INTEGRITY AT DCAF: WHAT DO I DO?

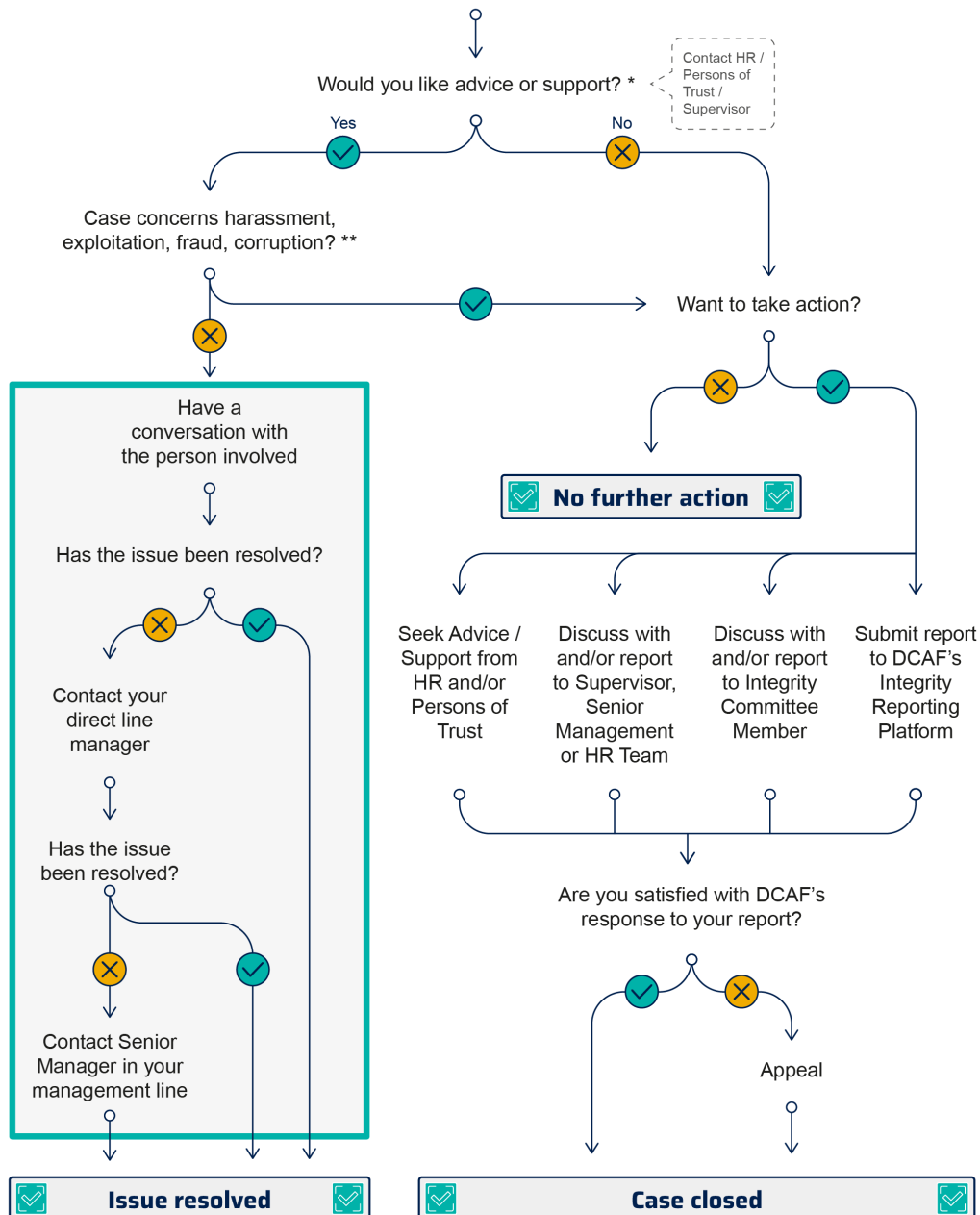


I have a work issue

I am a victim or witnessed harassment, abuse or exploitation

I suspect or know of fraud or corruption

Use Mechanism for Work Related Issues for workplace grievance



* Persons of Trust (internal & external) are bound by confidentiality in all circumstance. DCAF Representatives must intervene ex officio in the event of a violation of organisational rules and regulations.

** Definitions to be found in the Integrity Policy pages 2 and 11.

Appendix 2: DCAF Code of Conduct

1. Purpose and Scope

This Code of Conduct outlines the expected standards of behaviors for all individuals associated with DCAF, including staff, interns, apprentices, consultants, suppliers, training attendees, and volunteers. It aims to uphold DCAF's values, fostering a respectful and inclusive environment, ensuring integrity and professionalism in all activities.

2. General Principles

1. **Respect and Dignity:** Treat all individuals with respect, dignity, and courtesy, and promote an environment free from harassment, exploitation, and abuse.
2. **Integrity and Accountability:** Perform duties honestly and ethically, avoiding conflicts of interest and acting in the best interests of DCAF and its stakeholders. Be accountable for actions and decisions, upholding DCAF's reputation.
3. **Professionalism:** Demonstrate high standards of professionalism, fulfilling responsibilities with competence and commitment to DCAF's mission and values.
4. **Confidentiality:** Respect confidentiality agreements and privacy of information, especially concerning sensitive matters.

3. Conduct Towards Others

1. **Non-Discrimination:** Discrimination on the basis of race, gender, sexual orientation, disability, religion, age, or any other characteristic is prohibited. DCAF promotes inclusivity and equal opportunities for all.
2. **Harassment and Exploitation:** Any form of harassment, sexual or non-sexual, exploitation, or abuse is strictly prohibited via digital or any other means. This includes unwanted advances, inappropriate language, or any behaviour that could cause harm or discomfort to others. Exploitation and abuse, including of sexual nature, constitute acts of gross misconduct and are grounds for the termination of employment.
3. **Sexual activity with children** (persons under the age of 18), regardless of the age of majority or age of consent locally, is strictly prohibited. Mistaken belief regarding the age of a child is not a defence.
4. **Cultural Sensitivity:** Be aware of and respect the cultural norms and values of the communities and countries where DCAF operates, including actions that could be perceived as disrespectful or culturally insensitive.

4. Integrity in Professional Activities

1. **Conflict of Interest:** Avoid situations where personal interests conflict with DCAF's interests. Disclose any potential conflict of interest promptly.
2. **Gifts and Hospitality:** Do not accept gifts or hospitality that could influence, or be perceived to influence, professional duties. All offers over 100 CHF must be reported to DCAF.
3. **Use of DCAF Resources:** Use DCAF resources responsibly, including time, equipment, and information and only for legitimate DCAF purposes.

4. Cyber Misconduct: Through digital means and tools, such as cyber harassment, offensive and discriminatory digital communications, misuse of digital platforms that may cause harm to DCAF's reputation or the well-being of others will not be tolerated.

5. Compliance with Laws and Policies

1. Legal Compliance: Adhere to applicable laws, regulations, and DCAF's internal policies. This includes adherence to safeguarding policies, including anti-harassment regulations, and anti-corruption laws.
2. Reporting Misconduct: Report any observed or suspected misconduct, including breaches of this Code, through any established channels. DCAF will investigate all reports fairly and confidentially.
3. Protection for Whistleblowers: Individuals who report misconduct in good faith will be protected from retaliation.

6. Commitment to Safeguarding

1. Zero Tolerance for Exploitation and Abuse: DCAF maintains a zero-tolerance policy towards any form of exploitation, abuse, or harassment. Actively contribute to a safe environment by upholding these standards and supporting victims.
2. Duty of Care: Ensure the safety and well-being of those they interact with, especially vulnerable groups. This includes taking proactive steps to prevent harm and addressing any safeguarding concerns promptly.
3. Training and Awareness: Complete mandatory safeguarding training and stay informed about safeguarding issues and the procedures for reporting incidents.

7. Enforcement and Disciplinary Measures

1. Disciplinary Action: Breaches of this Code may result in disciplinary action, up to and including termination of employment, contract, or other forms of association with DCAF. The severity of the action will correspond to the gravity of the misconduct.
2. Appeals Process: Individuals subject to disciplinary action have the right to appeal the decision through DCAF's established appeals process. The appeal will be reviewed by an independent panel to ensure fairness.

8. Dissemination and Acknowledgement

1. Communication of the Code: DCAF will ensure that this Code of Conduct is communicated to all individuals within its scope. It will be included in contracts, agreements, and training materials to ensure understanding and compliance.

Appendix 3: Mandate of the Integrity Committee

The Integrity Committee oversees the implementation of the Integrity policy and ensures all complaints are addressed confidentially, impartially, and with a victim-centered approach.

The Integrity Committee consists of five (5) members:

- The three (3) permanent members are the Deputy Director, Head of HR, and Head of Finance & Facilities Management.
- Two (2) other members are staff members⁶ appointed for a period of 2 years.

The full Committee is responsible for the implementation of the Integrity Policy:

- Raise awareness about harassment, exploitation, abuse, fraud and corruption.
- Ensure that all staff have completed the Integrity e-learning and signed the Integrity Policy and Code of Conduct.
- Periodically review training and communications to ensure that they build the necessary knowledge and attitudes towards integrity. This includes periodic surveys to identify areas for improvement and ensure continuous learning.
- Gather lessons learned across DCAF on specific integrity related aspects, such as programme design integration or challenges faced in field locations.
- Monitor and analyze trends in integrity related cases.
- Maintain and update integrity related elements in the corporate risk register.
- Review the Integrity Policy application annually and propose recommendations for improvement.
- Report to the Director case statistics, compliance, emerging trends, and recommendations for policy enhancement.

The full Committee is responsible for ensuring that concerns and complaints are addressed appropriately:

- Handling and overseeing the process in accordance with the Integrity Policy.
- Determining whether to open an investigation.
- Appointing Committee Member(s) as case manager(s) and identifying competent investigators.
- Ensuring a victim-centered approach throughout the investigation.
- Determining appropriate actions and potential remedies.

While the full Committee oversees the implementation of the Integrity policy and subsequent case management, permanent members represent the employer and implement decisions related to disciplinary actions or employment matters. The Director takes the final decision based on the recommendation of the full Committee.

This structure ensures that the Committee's decisions incorporate a diverse range of input into the deliberative process, so that decisions are made with appropriate oversight and accountability.

If a case is received concerning a member of the Integrity Committee, or the Director or the President of the Foundation Council a designated person is appointed to handle the case in adherence to the principles of Conflict of Interest.

6: All staff are encouraged to apply, with the exception of Persons of Trust and Members of the Commission du Personnel.

Appendix 4: Terminology

Harassment

Harassment refers to any improper, unwelcome, or offensive conduct whether verbal, non-verbal, physical, or psychological that causes, or could reasonably be expected to cause, offence, humiliation, intimidation, or a hostile, degrading, or offensive work environment. It may take the form of words, gestures, actions, or deliberate omissions that demean, belittle, exclude, or threaten another person. Harassment can be directed at an individual or a group and may be repeated or occur as a single serious incident.

Sexual: is any unwanted behaviour of a sexual nature that is expressed physically, verbally or non-verbally and has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment.⁷

Psychological: Psychological harassment (or bullying, mobbing) occurs when a person or group of persons repeatedly and over a long period of time denigrates, insults, attacks, harasses, intimidates, ignores or excludes another person. Forms of psychological harassment also include destructive and unjustified criticism, spreading rumors and untruths, misinformation or withholding important information.⁸

Exploitation

The abuse or misuse of power, position, or trust to unfairly benefit oneself, often targeting individuals in vulnerable situations. This can involve financial, sexual, political, or social gain, and undermines dignity, rights, and fairness.

Sexual: Any actual or attempted abuse of a state of vulnerability, an imbalance of power or a relationship of trust for sexual purposes, with the aim of, including but not limited to, securing a financial, social, political or other form of gain (i.e. through transactional sexual relations, exploitative sexual relations, etc.).⁹

Non-sexual: The unfair use of someone or something for one's own advantage or profit, particularly in a manner that is harmful or unjust.

Abuse

Any action or behavior that causes physical, emotional, psychological, or sexual harm to another person. Abuse violates an individual's dignity and well-being and often occurs within relationships marked by power imbalances.

Sexual: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (this includes rape, sexual assault and forced prostitution).¹⁰

Non-sexual: The improper use of a position of influence, power, or authority directed against another person or group.

7: Swiss Federation Federal Department of Foreign Affairs (FDFA) Whistleblowing Platform.

8: Swiss Federation Federal Department of Foreign Affairs (FDFA) Whistleblowing Platform.

9: IFRC, 2007, Code of Conduct and Swiss Federation Federal Department of Foreign Affairs (FDFA) Whistleblowing Platform.

10: IFRC, 2007, Code of Conduct and Swiss Federation Federal Department of Foreign Affairs (FDFA) Whistleblowing Platform.

Psychological: Repeated behaviors that demean, humiliate, or emotionally harm another person, undermining their self-worth.

Fraud

Fraud means any wilful act, or omissions, with intent to deceive, calculated to induce consent, to obtain undue material or moral advantage, or to escape whether moral, contractual or legal obligations.

Examples: asset misappropriation, payroll fraud, vendor fraud, accounting fraud, financial irregularities.

Corruption

This term covers any form of illegal influence on the decision-making process or performance of a duty (for example granting or accepting undue advantages such as bribes, gifts, invitations, benefits in kind, etc.) resulting in direct or indirect financial, legal, reputational and/or political harm to the interests of DCAF.

Conflict of Interest

A conflict of interest arises when a situation creates a risk that the judgment or actions of an individual, who is expected to prioritize a primary interest, may be influenced by a secondary interest. The primary interest typically refers to a professional duty, such as the interests of an employer or client, while the secondary interest includes personal motivations.

*DCAF's Integrity Policy aligns with Swiss legal frameworks and international standards, ensuring compliance with all relevant national legislation and international standards. **Swiss legislation;** Swiss Code of Obligations; The Labour Act; The Swiss Penal Code; The Federal Law on Equality between Women and Men. **International standards;** Human Rights and Fundamental Freedoms Conventions; Relevant Swiss Law; DAC Recommendations on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance; ILO Convention on Violence and Harassment in the Workplace; The Core Humanitarian Standard on Quality and Accountability; Interagency Standing Committee Minimum Operating Standards for Protection from Sexual Exploitation and Abuse (PSEA) by own Personnel; Keeping Children Safe Standards. This list is not exhaustive.*