

In this edition, we share key lessons learned from 2017, an annual exercise intended to highlight important vulnerabilities and opportunities for improvement. This newsletter provides links to earlier newsletters and other resource materials that you can share with your colleagues and staff.

Our 2017 data indicates a continuing number of priority concerns which are listed below:

**Harassment** remains high on the concern radar. Unlike the cases that have made the news, most cases involve comments, texts, social media posts, emails (often in private), that may not have been intended to harass, but are experienced by the recipient as uncomfortable, intimidating, harassing, or even threatening. It is the impact of these communications and actions that matter, not the intentions.

**Fraud**, such as falsifying performance data or purchasing inferior equipment or supplies, remains a serious concern, particularly when it affects project beneficiaries.

**Personal Conflicts of Interest** continues to be a frequently reported issue, and is a concern particularly because it can be averted by employees disclosing personal relationships to help avoid the appearance of bias or unfair advantage.

**Disrespect in the work environment** is often reported through the ethics hotline website and is addressed as management issues. Our concern is that disrespectful relationships inhibit reporting ethical issues and ultimately project success.

If you have any questions or concerns about behavior related to the *Code of Business Conduct and Ethics*, talk with your supervisor. You can also send an email to [ethics@dai.com](mailto:ethics@dai.com), call the ethics hotline at +1-503-597-4328, or visit [www.dai.ethicspoint.com](http://www.dai.ethicspoint.com).

You can also reach out directly to: *Mike Walsh*, Chief Ethics & Compliance Officer ([mike\\_walsh@dai.com](mailto:mike_walsh@dai.com), 301-771-7998) or *Jeremy Finch*, DAI Europe's Director of Internal Audit and Ethics & Compliance Officer ([jeremy\\_finch@dai.com](mailto:jeremy_finch@dai.com), +44-7834-439974).

## Lessons Learned from 2017

### I Safeguard against exploitation and harassment

During a training session conducted by a DAI subcontractor, a woman, employed by a grantee, spoke to a DAI project employee telling her that the trainer had been making unwanted advances to her over the last three days, touching her and persisting in asking her to see him in the evenings. She said she felt disrespected and intimidated, adding that she did not want the project employee to raise the issue with DAI management because it may jeopardize the grantee's relationship with DAI and the training subcontractor.

**What would be your concerns if approached by this woman with this information? What action would you take? Read last year's DAI Global Conduct Quarterly newsletter about sexual harassment [here](#).**

**Action:** The DAI project employee reassured the grantee employee that such behavior was not tolerated and there would be no retaliation for reporting it. She explained the importance of raising the issue to the COP and DAI management to ensure a quick and appropriate response. The DAI project employee called her supervisor, the Technical Director on the project. The Technical Director immediately contacted the head of the subcontractor and outlined her understanding of the matter, requesting that the subcontractor employee be kept off the training site until the issue has been investigated and addressed. After further consultation between the Technical Director and the COP, the issue was elevated to the CECO. The COP was advised to follow-up with the training subcontractor to enable appropriate investigation and action. The subcontracting company investigated and found that their employee had been reprimanded a year ago for similar behavior and was therefore fired.

#### Takeaways:

1. It is important to take immediate action to safeguard DAI employees, implementing partners and beneficiaries from exploitation and harassment.
2. Safeguarding and harassment allegations must be elevated to management to assure timely and appropriate responses.
3. Individuals reporting allegations must be protected from retaliation. DAI does not tolerate any retaliation against an individual reporting allegation. DAI's non-retaliation policy can be found [here](#).
4. A reflection for men: If you do not want a man to say or do something to your sister, mother, daughter or spouse, then don't say it or do it to another woman.



## Anti-Harassment Quick Tips

All DAI employees can expect to work in a respectful work environment. Managers and supervisors set this tone and reinforce this behavior. They are expected to model respectful behavior and be on the lookout for harassment and other inappropriate behavior.

### IF YOU EXPERIENCE HARASSMENT:

**Disrupt** the situation by removing yourself, ignoring or distracting the harasser.

**Document** the behavior, and;

**Report** as soon as feasible to your supervisor (if appropriate) or the Chief of Party, Team Leader or the ethics office through [ethics@dai.com](mailto:ethics@dai.com), or +1-301-771-7998.

### IF YOU WITNESS HARASSMENT:

**Support** the victim in helping her or him to disrupt, distract or remove herself/himself from the situation and help and support the victim in reporting the incident

### IF YOU ARE A SUPERVISOR AND WITNESS HARASSMENT:

**Respond quickly** to the incident.

Meet *privately* with the harasser, specifying the problem behavior. Get *commitment* from the harasser that it will not happen again.

**Document** the meeting.

**Contact** Human Resources in your respective Home Office

### IF YOU ARE NOT A WITNESS, BUT AN APPARENT VICTIM BRINGS YOU ALLEGATIONS OF HARASSMENT:

**Show respect** and keep an *open mind*, focusing on ascertaining the facts.

Keep complaints **confidential** and **report** the allegations through proper channels to the Ethics and Compliance Officer.

Retaliation is unacceptable.

## 2 Respect in the Workplace

An anonymous ethics hotline reporter stated that a named project supervisor often made disparaging remarks, ridiculed and mocked people who worked for her. The employee said that the supervisor was hired by the Team Leader without going through a recruitment process because she is her friend and a former colleague from another project. The reporter added that the supervisor often threatens her staff and others with firing them if they do not do her wishes. The reporter described the low morale among all staff because they could not raise their concerns to the Team Leader due to her special relationship with the supervisor.

### What is the nature of this issue?

**Appropriate Action:** Although there does not appear to be an ethical issue, we are concerned because the supervisor may have created an atmosphere in which employees do not feel comfortable raising any issues or concerns. Trust, morale and teamwork are essential elements of success and must be actively cultivated by Team Leaders, Chiefs of Party, managers and supervisors. Employees should feel that they can raise issues that may be uncomfortable – and to be heard and taken seriously. This respect is earned and is easily lost when fear is created.

In this instance, the Home Office worked with the Team Leader to address the management skills and interpersonal tone of the supervisor. Close oversight by the Team Leader has helped re-establish better team dynamics.

### Takeaways:

1. You are not alone. Seek support from your colleagues. Support those being bullied or mocked. "I am with you. You are not alone."
2. You are empowered in your job to say no. It is your responsibility to dissent if that is your professional judgment.
3. Create a team atmosphere in which people feel empowered to have uncomfortable conversations.
4. Set an example in your relationships at work and with our clients, business partners, and beneficiaries. Our activities are highly visible where we work. We need to model respectful and fair work environments and relationships to generate trust, which is essential for development.
5. We are in this together. Read last year's DAI Global Conduct Quarterly newsletters: about the importance of respect in managing our implementing partners [here](#) and about ethics and respect in the workplace [here](#).

### 3 Monitor & document results and value

**A** Community-Based Organization received grant funds to conduct town hall meetings in six communities. Project staff visited four of the communities and spoke with town elders and youth leaders about these events. They learned that the CBO representative visited briefly, took down 20 names of potential town hall meeting participants and took a posed photo of community members. The CBO representative did not return for the scheduled meeting much to the frustration of the community leaders who complained that the farms had been neglected while they were waiting for the CBO meeting.

**What is the nature of these findings and what should be done next?**

**Action:** The findings of the project staff were documented in field reports. The Ethics and Compliance Officer was contacted. Internal Audit happened to be in the country on a separate audit and could do a spot check with the elders and youth leaders interviewed by the project staff using cellphone contacts provided in the field reports. Those who the auditor could reach confirmed that the CBO took names and photos, but did not show up for the promised meetings.

The client was informed of this issue and agreed that the grant should be terminated. Additional actions taken by the project to limit this vulnerability in the future included requiring the presence of a project employee at all workshops. Grantees were trained on how to document sessions with photos, audio and video as well as more standardized attendance registration. Spot checks of attendance lists were conducted as well.

#### Takeaways:

1. Clients are asking what results have been achieved for their development investment. Did DAI, and by extension, our client, get what was paid for? Is this documented?
2. Oversight, monitoring and evaluation are essential to assuring performance and deterring fraud.
3. Deliverables, monitoring, outcomes, etc. must be documented consistently and systematically to be reliable.
4. Ask yourself: Do we have the ability or mechanism to internally review our results? Can we demonstrate success with documentary or tangible evidence?

### 4 Demonstrate fairness in our actions and decisions

**An** anonymous ethics hotline report was received stating that the project's Technical Lead was a long-time friend and former colleague of the Executive Director of an organization that had applied for grant funding under the project. The anonymous reporter stated that the grants manager was being pressured to "get on with the grant" suggesting that the award should quickly be made without further negotiation of costs and due diligence.

**What could have been done to avoid this issue? Read last year's DAI Global Conduct Quarterly newsletter about Conflicts of Interest [here](#).**

**Action:** An investigation into the details found that the Technical Lead had disclosed his prior work with the proposed grantee organization. An examination of Google results also discovered that the Technical Lead had been doing work for the organization while employed with the project. The Project Director determined that the Technical Lead did not fully disclose the continued ties to the organization and his pressure on the grant manager was inappropriate. The Technical Lead was separated from the project and given his key position, the client was informed.

#### Takeaways:

1. Awareness of a possible conflict of interest is important, but the disclosure of relationships is essential to avoid the perception of bias or favoritism.
2. Most common are family ties to vendors and grantees.
3. Ask yourself: What is the perception from the outside? Would a third party think that an action or decision was unfair or biased? Would we view the decision or action as unfair or biased if we were in a competitor's position?

- Safeguard
- Manage Respectfully
- Monitor and Document
- Demonstrate Fairness
- Report