

Welcome to the fourth issue of the quarterly newsletter. In this edition, the key focus is on sexual harassment. As Jim Boomgard stated in his November 14, 2017 message to DAI employees, **“we do not tolerate sexual harassment at DAI.”** This edition of the newsletter reinforces this point as it provides actual case studies that should be shared and discussed with staff by the Chief of Party, Team Leader, manager or supervisor.

The newsletter is part of an effort to raise employee awareness of what constitutes harassment, provide information about reporting suspected incidents and reinforce DAI’s non-retaliation policy.

We also wish to echo Jim’s assurances in his message that “...we will treat your story respectfully and in confidence, and you need not fear reprisals of any kind.”

Please discuss the case studies in this newsletter with your staff. Unlike the cases that make the news, most cases entail comments, texts, emails, often in private, that the accused state were not intended to harass, but are certainly taken that way in the eyes of the person who is on the receiving end. It is the impact of these communications and actions, not the intentions, that matter.

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, call the ethics hotline at +1-503-597-4328, or visit www.dai.ethicspoint.com.

You can also reach out directly to *Jeremy Finch*, DAI Europe Head of Internal Audit and Ethics & Compliance Officer (jeremy_finch@dai.com, +44-7834-439974) or *Mike Walsh*, Chief Ethics & Compliance Officer.

This document and additional materials can be found at: <http://dai-global-conduct.com/global-citizenship/respect-and-no-harassment/>

Sexual Harassment Case Studies

Case Study I

After the annual project staff retreat, a group of employees went to a restaurant nearby for an informal celebration. A young female employee suggested to the male Lead Technical Director to join them for a celebration rather than go back to his hotel room as he was planning to do. During the evening’s celebration, he sat with the woman who invited him. As the evening progressed, he felt she was being overly friendly with him and took that as sign to put his hands on her arm and hand. When his touch lingered, she told him she was offended and quickly departed the event. The following day, the lead technical director suggested to the Team Leader that the woman is not up to the required standards of the job and suggested that she be released from the project.

The Team Leader was concerned about this sudden decision, and having heard rumors about the party the previous night and the episode with the woman, decided to investigate further in consultation with HR in the home office. When asked about what happened, the lead technical director defended his actions by saying that he felt her friendliness was a sign that she was interested in him.

What policies were violated, if any? Was his behavior appropriate as it was in a restaurant out of the office?

DAI Action: Following a thorough investigation, HR and the Team Leader determined that the Lead Technical Director had crossed the boundaries of appropriate behavior and harassed the employee and violated the non-retaliation policy. He was separated from the project.

Takeaways:

1. Adherence to the Code of Business Conduct and Ethics does not stop when you depart of the office. Employees are expected to be respectful of each other regardless of the context.
2. Being friendly does not give permission for a person to physically touch another person. And when a person says “stop” or “no”, that means “NO”. Further interaction should cease.
3. Harassment and retaliation are serious matters that require careful investigation by management to determine what happened and devise appropriate courses of action.



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, 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.

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 the facts.

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

Retaliation is unacceptable.

Case Study 2

A project recently hired a new female administrative assistant. The DCOP, a male, continually asked the new assistant about her personal life. He inquired whether she had a boyfriend or someone special, and what she did during the weekends. Each time, she avoided a straight answer and as a new employee and a woman in a male-dominant culture, she felt powerless to ask him to stop. The questioning continued over weeks. As he did not get a straight answer, he suggested she meet his male friend the coming weekend as she must not have a boyfriend. Given she felt she could not say no, she confided to a female colleague who supervised operations.

What should the female Team Leader do?

Action: The operations supervisor encouraged the administrative assistant to tell the COP. She was hesitant. The operations supervisor stated that DAI does not tolerate such behavior and as a supervisor she is required to report this behavior and assured her that she would be protected from retaliation. The operations supervisor spoke to the COP who, with the help of home office project HR, conducted an investigation.

The investigation confirmed the story, and it came to light that the DCOP often inquired about entry-level female staff's personal lives. He did not think this was inappropriate, stating that men in this culture often talked to single women that way. Given the prevalence and persistence of his behavior, he was separated from the project.

Was his behavior against a DAI policy given his answer that it was part of the culture?

Takeaways:

1. Culture is not an excuse for inappropriate behavior and the lack of professional respect at the workplace.
2. Males and especially those in power, must understand the impact of their words and behaviors. This is especially true when a culture is male-dominant, and female staff might be afraid to raise an issue they feel inappropriate.
3. All managers have a responsibility to report instances of sexual harassment even if the employee asks for confidentiality. DAI protects people who report such behavior and managers are responsible to ensure the office environment is safe and productive for everyone.

Case Study 3

An ethics hotline report was received from an anonymous employee that the COP on a project was “corrupt.” The details of the report alleged an affair between the male COP and the female Manager of Communications. They eat lunch together and often arrange to travel to the field together, staying at the same hotel and have been seen outside the office together. The reporter adds that everyone is intimidated by the Manager of Communications because of her relationship with the COP. She often gives orders outside the communications department. The COP also directs her to get involved in issues beyond her responsibilities, such as grantee selection and vendor negotiations. The reporter states that the team is very discouraged and is at a loss what to do because they want to do their best but do not want to cross the COP or his “girlfriend.”

What issues are involved in this scenario?

Action: An investigation involving Home Office project management, HR and Internal Audit looked into the allegations. Internal Audit found a few instances in which scores were changed on evaluations when the Manager of Communications was on the evaluation committee of grantees. HR also found credible evidence of a personal relationship between the COP and Manager of Communications. Home Office project management replaced the COP, and the Manager of Communications resigned.

Takeaways:

1. Personal relationships between supervisors and subordinates are not appropriate. Such relationships can lead to corruption, poor working environment and favoritism.
 2. Additionally, when employees of different levels are involved, the lower level employee could have felt forced into the relationship.
 3. The anonymous reporter was correct to report this to the hotline.
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Case Study 4

A study tour of 20 Ministry officials to a third country was accompanied by the Deputy Chief of Party and two female project associates. During an evening of dinner and drinks, a male Ministry official cornered one of the female project associates and attempted to touch her inappropriately. Her colleague saw her in the corner and came over to interrupt what she saw was an awkward moment. She called her name, which distracted the official and gave her the space to walk quickly away from the official. Later that evening, the project associate told her colleague about the Ministry official’s attempts to touch her. She was hesitant to say anything to the DCOP to avoid embarrassment and possible repercussions with the client. Her colleague said she witnessed the encounter and would support her report.

What should they do given it is a Ministry official?

Action: Together, the project associates informed the DCOP, who then reported the incident to the COP. With guidance from the Home Office, the DCOP and COP engaged the Study Tour Ministry leader who then spoke with the official who accosted the associate. The explanation from the Ministry leader was that the official was drunk and did not recall many details. Nonetheless, the COP insisted that such behavior harms the trust and respect needed within the group for a successful study tour. The COP and DCOP arranged for an apology from the official and his early return from the trip.

Takeaways:

Employees should report any incident whether it involves a client representative, Government Official, local counterpart or vendor. All incidents are important to report so DAI can ensure such incidents to do not reoccur.

DO THESE CASE STUDIES MAKE YOU THINK THAT YOUR OWN BEHAVIOR COULD BE CONSTRUED AS HARRASSMENT (INTENTIONALLY OR NOT)?

STOP

DO ANY OF THESE CASE STUDIES RING ANY ALARM BELLS?

THINK

IS SOMEONE MAKING YOU FEEL UNCOMFORTABLE BY THEIR WORDS OR BEHAVIORS?

REPORT