



# People in Peril

## Code of Conduct

July 2023

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Last revised	7 July 2023
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**LIST OF CONTENT**

**INTRODUCTION.....1**

**1. PIP CODE OF CONDUCT AND SAFEGUARDING FRAMEWORK.....1**

**2. PIP CORE PRINCIPLES AND STANDARDS OF CONDUCT .....1**

**3. APPLICABILITY AND RESPONSIBILITY .....2**

**4. STANDARDS OF CONDUCT.....2**

    Non-profitability and voluntariness of our assistance ..... 2

    Respect for people and non-discrimination ..... 3

    No corruption..... 3

    No conflict of Interest ..... 4

    Professionalism ..... 4

    No sexual exploitation or abuse..... 5

    No interpersonal sexual relationships between PIP staff and beneficiaries..... 5

    No bullying, harassment, discrimination, intimidation or abuse ..... 5

    No alcohol and drugs abuse ..... 6

    Transparency and communication of PIP ..... 6

    Supporting and strengthening affected populations' capacities ..... 6

    Independence and compliance with the rules ..... 7

    Responsibility towards PIP assets, resources or information ..... 7

    No political involvement of PIP staff that harms PIP's working goals or its perception of neutrality ..... 7

    Safety and security..... 8

    Environmental protection ..... 8

**ANNEX 1 – TERMINOLOGY ..... 9**

## INTRODUCTION

People in Peril (hereinafter PIP) is a non-governmental, non-profit organisation providing relief and development assistance worldwide. It was founded in 1999 with an aim to effectively help people, who suffer as a consequence of conflicts, natural disasters and non – democratic regimes. Gradually, we have added educational activities and assistance in marginalized communities in Slovakia into our mission.

PIP is committed to the best practice and quality of work of its staff, its partner organisations and other associates.

## 1. PIP CODE OF CONDUCT AND SAFEGUARDING FRAMEWORK

The PIP Code of Conduct represents the essence of the PIP Policies and must be read in conjunction with all the Key PIP Policies listed below. The Safeguarding Framework stands to define a minimum package of ethical standards of behaviour and includes:

- PIP Code of Conduct
- PIP Safeguarding Policy
- PIP Child Safeguarding policy
- PIP Prevention of Sexual Exploitation and Abuse (PSEA) policy
- PIP Whistleblowing policy

Furthermore, policies above must be read in conjunction and are complemented by:

- PIP Investigation procedure
- PIP AAP Framework
- PIP Complaints, Feedback and Response Mechanism (CFRM) procedure

## 2. PIP CORE PRINCIPLES AND STANDARDS OF CONDUCT

PIP standards of conduct refer to the below principles and standards of conduct:

- Non-profitability and voluntariness of our assistance
- Respect for people and non-discrimination
- No corruption
- No conflict of Interest
- Professionalism
- No sexual exploitation and abuse
- No interpersonal sexual relationships between PIP staff and beneficiaries
- No bullying, harassment, discrimination, intimidation or abuse
- No alcohol and drug abuse
- Transparency and communication of PIP
- Supporting and strengthening affected populations' capacities
- Independence and compliance with rules
- Safety and security
- Responsibility towards PIP assets, resources or information
- No political involvement of PIP staff that harms PIP's working goals or its perception of neutrality
- Environmental protection

Furthermore, PIP operates under the following principles:

- Efficiency
- Assistance provided based on need
- Accountability

- Partnerships
- As well as humanitarian principles: humanity, neutrality, impartiality and independence

### 3. APPLICABILITY AND RESPONSIBILITY

This Code of Conduct is obligatory for all employees and associates of PIP, including the management team, employees, staff working on other type of contracts, consultants, interns and volunteers<sup>1</sup> (hereinafter referred to as 'PIP staff'), as well as partner organisations<sup>2</sup> working in the name of PIP, unless they have their own policies (hereinafter referred to as 'partners'). Key principles of this Code of Conduct are also applicable to external suppliers in direct contact with PIP beneficiaries.

This Code of Conduct must be read in conjunction with PIP Safeguarding Framework.

This Code of Conduct and the relevant Safeguarding Framework, are applicable both inside and outside of office hours.

It is the responsibility of all heads of departments and all staff in managerial roles to not only comply with the Code of Conduct, but to lead by example and to create such environment for PIP staff where behaving in accordance with the Code of Conduct is expected and rewarded.

The Code of Conduct is an internal policy of PIP. Any behaviour breaching the below standards of conduct is considered a violation of working discipline and may result in disciplinary action, including dismissal.

### 4. STANDARDS OF CONDUCT

PIP staff have a responsibility to the organisation to strive for and maintain the highest standards of personal and professional conduct in line with PIP beliefs, policies, values, mission and vision. All PIP staff must ensure that their behaviour during and outside of work supports PIP's mission and values.

PIP staff are obliged to avoid any unacceptable behaviour and to comply with the following standards.<sup>3</sup>

#### Non-profitability and voluntariness of our assistance

PIP is a non-profit organisation which provides generally beneficial services for all its beneficiaries (hereinafter referred to as 'beneficiaries' or 'affected populations') under predetermined and equal conditions, and whose profit must not be used for the benefit of its founders, members of its bodies, nor its employees but is in all extent used for securing generally beneficial services.

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<sup>1</sup> Volunteers above age 18 who are in direct contact with PIP beneficiaries or represent PIP externally

<sup>2</sup> In this context, "partner organisation working in the name of PIP" is an entity for which PIP provides financial or other resources, i.e. usually a national or international NGO

<sup>3</sup> For further details, refer to the PIP Safeguarding Framework, Safeguarding, Child Safeguarding and Prevention from Sexual Exploitation and Abuse policies.

All our beneficiaries enter the collaboration with PIP voluntarily and can decide to terminate the collaboration with us anytime. The collaboration with affected populations may never be conditional on the fulfilment of other requirements, unless a project, within which the collaboration is taking place, literally requires it. Effective and sustainable assistance can be best achieved in situations where its beneficiaries are involved in the design, management, implementation and evaluation of support programmes – hence, we will try to achieve the full engagement of the community into our activities and programmes.

## Respect for people and non-discrimination

All people have to be treated with respect and dignity. Any forms of discriminative behaviour on the basis of race, gender, religion, social status, colour, national or ethnic origin, language, age, disability, political affiliation or sexual orientation and others are unacceptable. This rule does not contradict the possibility of PIP to give priority and provide services to beneficiaries from vulnerable population groups if the conditions require it. The assistance of PIP is provided solely on the basis of needs of individuals, families and communities and is based on the consent of recipients with this help.

Similarly, there is prohibition of any discrimination during the hiring process and during the whole duration of employment of PIP staff. PIP seeks to create diversity in the working environment.

PIP staff have to observe local laws and cultural norms and behave in culturally sensitive manner. PIP staff should always use language and dress appropriately to the circumstances, respectful of the cultures and societies they interact with, and ensuring a respectable and positive perception of PIP.

As PIP is impartial, neutral and non-confessional, while it is allowed for PIP staff to be part of political, or religious or any other group, it is at the same time forbidden to publicly display such belonging or to engage in political activities or in the promotion of one's religious values in a way that could negatively impact the working goals of the organization or harm the perception of PIP's impartiality, neutrality or independence.

## No corruption

Corruption is defined as the abuse of power for personal gain. It includes offering, donating, demanding or accepting financial or material gifts, loans, rewards or any other benefits from/for a third party in order to obtain something dishonestly, illegally or violating the framework of legal or contractual relationships. As corruption, we consider particularly accepting and giving bribes and other benefits, enforcing or abusing entrusted resources, deals restricting competition, money laundering, provisions from obtained contracts (so-called kickbacks), paying unreasonable prices and fees to a third party for a personal gain and accepting undue donations in order to gain an advantage.

Corruption in any of the mentioned forms is prohibited. PIP staff may not use his/her working position to achieve personal profit or benefit and have to avoid any situation where personal interests could be in conflict with the interests of PIP. PIP staff are obliged to inform about any alleged corrupt behaviour that they witnessed.

The only case in which corrupt behaviour could be considered, is a serious threat to life, health or safety of PIP staff. However, PIP promises to plan its activities in such manner to minimize the risk in which such behaviour is required under pressure. At the same time, the rule of non-payment of ransom in case of kidnapping is applicable, as stated in the Safety and Security Policy of the RDD department.

## No conflict of Interest

PIP staff must not use their working position to obtain an unlawful personal advantage or profit and must avoid situations in which a conflict with interests of PIP could be expected.

Staff of PIP is not allowed to:

- use the name or activities of PIP, as a tool of propaganda when executing public, political or religious activities
- join the activities of member organisations, alliances and associations whose focus is in a profound conflict with activities, values and goals of PIP
- be simultaneously employed or to contribute to work of a legal entity whose activities, values and goals are in conflict with the activities, values and goals of PIP
- accept gifts or any other benefits (except small tokens of appreciation) from partner organisations or business partners and keep them for personal use
- use confidential information obtained during the duration of employment for PIP for personal benefit or for the benefit of third parties
- use their position in PIP to gain personal benefits
- prefer family members if they are employees of PIP.

PIP staff are also obliged to without any delay notify and consult with their superiors the suitability of following situations and behaviour:

- being in a position of a supplier of goods or services at the same time
- participating in business activities in the area of operation of PIP
- close personal relationships with the clients of PIP or representatives of organisations with which PIP have business or partner relationship
- membership in organisations, boards or control bodies of institutions from which PIP obtains resources
- participation in managing or control bodies of partner organisations
- employing family members
- ownership or partnership, own or those of family members or close persons in business companies which have a business relationship with PIP
- paid activities (lecturing, training, public presentation) that fall under the scope of employment during the working time of PIP staff with revenue exceeding €150,00 per month
- paid activities related to the scope of employment of an employee outside of working hours in accordance with the Labour Code.

## Professionalism

PIP, carries out its activities professionally using specific knowledge and abilities of its staff. PIP staff perform only those activities for which they are professionally and personally competent. They follow their personal and professional limits and develop them, educate themselves and improve their practical skills with the aim of achieving the best results. In case of solving complex work challenges in their jobs, PIP staff has the possibility to consult their assignment with the team, superior or supervisor.

## No sexual exploitation or abuse

PIP does not tolerate any form of sexual exploitation or abuse perpetrated by PIP staff and partners against any individual. PIP commits to do all the needful for preventing its programmes having any negative effects, such as sexual exploitation and abuse, by PIP staff and partners against beneficiaries and members of the community.

Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of sexually humiliating, degrading or exploitative behaviour by PIP staff is prohibited. This includes the exchange of assistance for sex. It is further prohibited to touch anyone in a sexually inappropriate or culturally insensitive manner or to access child pornography or any inappropriate pictures of children through any medium.

PIP staff **must**:

- report any concerns or suspicions regarding child safeguarding violations of this Code of Conduct by any PIP staff to the appropriate staff member through the appropriate channels
- contribute to creating and maintaining an environment that prevents sexual exploitation and abuse violations and promotes the implementation of the Child Safeguarding Policy

## No interpersonal sexual relationships between PIP staff and beneficiaries

Sexual relationship between a PIP staff and a beneficiary is likely to be based on inherently unequal power dynamics and may undermine the credibility and integrity of PIP and its work. As such, sexual relationships between PIP staff and beneficiaries of our programmes are prohibited. Such relationships undermine the credibility and integrity of PIP and its work.

All PIP staff should consider engaging in sexual relationships with a local employee or associate of PIP, whereas questions of personal safety, achieving goals of the programme, possible conflict of interest and the reputation of the organization in the local community should be mainly considered.

Every employee in a managing or supervisory position must take into consideration that a sexual or romantic relationship with their subordinates may be seen as favouritism, abuse of authority and potentially sexual harassment.

Any sexual activity between PIP staff and an underage person (under 18 years old) is strictly forbidden and must be without any delay reported to a superior, and in case of a criminal offense according to the laws of the given country, to the police as well. The incorrect estimate of minor's age is not an acceptable argument.

## No bullying, harassment, discrimination, intimidation or abuse

Actions of PIP staff should be fair and honest. All people have to be treated with dignity and respect regardless of their race, sex, gender, social status, religion, nationality or ethnicity, language, age, disability, political affiliation or sexual orientation. PIP staff must never engage in any humiliating, degrading or exploitative behaviour. Any form of physical violence - unless in self-defence – is unacceptable and will lead to immediate dismissal. The use of inappropriate, violent or offensive language in oral or written form towards others is not acceptable.

Any psychological harassment, bullying, attacks or intimidation, as well as sexual harassment of PIP staff, by a superior or any other staff is prohibited and may be considered a criminal offense. In this matter, the organisation applies a zero-tolerance

policy. The management of the organisation, as well as the staff itself must be cautious towards the possible presence of harassment in the workplace and use due measures to prevent such harassment.

At the same time, PIP will not be tolerant of such behaviours towards PIP staff from third parties.

### No alcohol and drugs abuse

PIP staff do not work under the influence of alcohol or other drugs that impact their ability to perform their job. The possession, distribution or consumption of illegal substances at the work place (including PIP cars) or when on duty is strictly forbidden. In countries we operate in, PIP staff abide by local laws regarding the possession and use of narcotics.

### Transparency and communication of PIP

PIP undertakes to provide the most accurate information regarding the organisation and its activities or individuals to the public. PIP respects the integrity of each individual. When informing the public about our activities, as well as in fundraising activities, the organisation commits to respect the affected populations benefitting from aid and to preserve their dignity. We portray individuals to the public with their abilities and ambitions, not just as vulnerable persons that are afraid and powerless. Whenever possible, we obtain the consent of the individual to use their image and information about them.

In contact with the media, in cases of need for increased public response, PIP staff will respect these abovementioned principles and values. They will never compete with other subjects providing assistance for media attention in a situation where it may harm the act of providing services and assistance for the recipients or endanger the safety of employees/persons working for organisations providing assistance services. Communicating with the media in the name of PIP and/or activities of PIP is only allowed to PIP staff who are authorized to do so or who have it as part of their job description.

PIP commits to transparency in relation to state institutions, the public, donors, partners, affected populations and anyone who shows interest in information regarding the use of resources for the activities of the organisation with the exception of publishing private and personal information or information that could affect the safety and dignity of third parties in accordance with the internal rules of the organisation. PIP regularly publishes basic financial information, management structure, activities and financial resources through its Annual Reports.

### Supporting and strengthening affected populations' capacities

The aim of our work is to build and support local capacities of the people and communities we work with. Hence, whenever possible, we will try to support these capacities by employing local workforce, buying local materials and doing business with local firms. At the same time, we will try to minimize the negative impact of external assistance in favour of reducing the dependence of recipients on this external assistance.



## Independence and compliance with the rules

PIP acts in their activities independently of any government. PIP staff must not be misused to gather information of political, military or economic nature for governments or other institutions, which could serve other than strictly humanitarian goals. To protect our independence, we will try to diversify our funding sources.

Furthermore, we will carefully consider the motive of the donations and the origin of the resources we work with, and in case of doubt and risk of damaging the good name of PIP the resources will be rejected or returned back.

PIP will not engage in any activities that would be in contradiction with international norms and rules. PIP commits to adhere to all of the legal obligations arising from the laws of the country in which it has its seat. Moreover, the organisation promises to respect the culture, structure and traditions of the communities it works with.

Every PIP staff participates in fulfilling the organisation's mission and strategic goals. They are responsible for following all the rules set by the organisation. They are also, to a reasonable extent, responsible for the persons to whom the assistance is provided, and that is namely during activities connected with their job performance. They will make every effort and take all necessary precautions to ensure that their activities will not negatively impact or harm the affected populations they assist.

## Responsibility towards PIP assets, resources or information

It is expected that each PIP staff will use the property and financial or other resources of the organisation in a responsible manner in accordance with the rules and guidelines of the organisation.

The property of PIP must not be used for illegal activities including any forms of misconduct. All property, goods and services purchased within the programmes of PIP, must be used adequately for the purpose that they were obtained for and in a manner regulated by the organisation's internal rules. The damage of the PIP property by deliberate action or gross negligence results in personal material liability towards the specific PIP staff.

Any confidential information pertaining to and acquired during the employment period for PIP must not be shared outside the organisation in accordance with the relevant provisions of the employment/other contract and personal data protection laws, and violation of this rule may be financially or otherwise sanctioned.

## No political involvement of PIP staff that harms PIP's working goals or its perception of neutrality

As PIP is impartial, neutral and independent, while it is allowed for PIP staff to be part of political groups, it is at the same time forbidden to publicly display such belonging or to engage in political activities in a way that could negatively impact the working goals of the organization or harm the perception of PIP's neutrality. Any PIP staff who wishes to take part in such activities or to stand for public office must obtain PIP's prior approval. Also, it is important that the group's values and/or political objectives are not misaligned with this Code of Conduct and principles, and that such participation ensures no conflict of interest for PIP's staff role.

PIP will consider the involvement of politically active persons in its public activities, whose participation could threaten the perception of PIP's neutrality and reputation of the organisation.

## Safety and security

PIP staff are required to comply with local security guidelines and act consistently with PIP policies and guidelines regarding safety and security at work. PIP staff have to behave in ways that avoids unnecessary risks to the health, safety and security of themselves, of their team members, and of those whom they manage. The same attitude must be practiced towards partner organizations and PIP beneficiaries.

## Environmental protection

PIP and PIP staff are responsible and active in environmental protection and they try to apply this principle in all their activities and their functioning – both in planning and implementing the projects and programmes, as well as in day-to-day life within the organisation's premises.

## ANNEX 1 – TERMINOLOGY

Clear definitions are essential for the consistent manner of understanding, categorizing, reporting and responding to individual breaches of PIP Code of Conduct.

All forms of behaviour listed below are used in the PIP Safeguarding Framework, and in all relevant Policies, including PIP AAP Framework. They are referred to in the PIP Code of Conduct as unacceptable or forbidden behaviour.

### Abuse

Abuse is a wrong, improper use or treatment of something or someone causing harm, damage, offence or distress. There are several forms of abuse (such as physical abuse, verbal abuse, sexual abuse and emotional abuse – see definitions below), any or all of which may be perpetrated as a result of deliberate intent, negligence or ignorance.

### Bullying

Bullying is repeated inappropriate behaviour (verbal, physical or otherwise), conducted by one or more persons against another, which could reasonably be regarded as undermining the individual's right to dignity.

It can happen at work, between colleagues, but also in our interaction with people in our programmes – be them beneficiaries, partners, etc.

An isolated incident of such behaviour may be an affront to dignity, but a one-off incident is not considered as bullying. The exercise of legitimate management/employee rights or responsibilities is not bullying.

A pattern of the following behaviours are examples of types of bullying:

- Verbal or written abuse or insults
- Being treated less favourably than colleagues
- Intrusion – pestering, spying or stalking
- Menacing behaviour
- Intimidation
- Excessive monitoring of work
- Humiliation
- Withholding work related information
- Unreasonably changing or manipulating a person's job content and targets
- Blame for things beyond the person's control
- Manipulation of the victim's reputation by rumour, gossip or ridicule
- Preventing the victim from speaking by making loud voiced criticisms or obscenities
- Constant undermining, mockery or criticism that focuses on a personal characteristic
- Exclusion, or victimisation
- Aggressive behaviour towards others, including unreasonable anger or shouting
- Abuse or threats of abuse
- Persistently manipulating the nature of the work or the ability of the victim to perform the work e.g. by overloading, setting objectives with impossible deadlines, deliberately withholding work information, or setting meaningless or unachievable tasks
- Repeated criticism of work without balancing this with positive feedback where possible or by providing potential solutions
- Criticising an individual's capabilities or her/his personality in front of others

## Child abuse

Child abuse and neglect, sometimes also referred to as child maltreatment, is defined as all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust, or power.

Within the broad definition of child maltreatment, five subtypes are distinguished:

- *Physical abuse* is actual or likely physical injury to a child, such as hitting, kicking or shaking.
- *Emotional abuse* is harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying or not giving care and affection, resulting in adverse effects on the behaviour and emotional development of a child or young person.
- *Neglect* occurs when basic needs such as food, warmth and medical care are not met, resulting in the serious impairment of a child's or young person's health or development.
- *Sexual abuse* occurs if a child or young person is pressurised or forced to take part in any kind of sexual activity. A child cannot consent to any form of sexual activity. Sexual abuse includes incest, rape and fondling, showing pornography or viewing pornographic images of children. Sexual abuse may involve siblings or other family members, or persons outside the family.
- *Commercial or other exploitation of a child* refers to the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour (minimum acceptable age for employment or work is 15, while for work which might jeopardize the health, safety or moral (so called "worst forms of child labour") is 18) and child prostitution. These activities are detrimental to the child's physical or mental health, education, moral or social-emotional development.

## Conflict of interest

Conflict of interest is a situation where PIP staff would use their working position or PIP name, logo or reputation to achieve personal profit or benefit. This may occur in the following situations:

- PIP staff, their family members or friends would supply goods or services to PIN, unless undergoing a fair and fully transparent selection process.
- PIP staff would be directly hiring or supervising their family members, bypassing a regular and transparent process.
- PIP beneficiaries would be family members or friends of PIP staff, bypassing a regular process of beneficiaries' selection.
- Taking loans from PIP beneficiaries

## Corruption

Corruption is an abuse of the entrusted power for the private advantage of any person. This includes offering, giving, demanding or receiving financial or material gifts, loans, rewards, provisions or any other advantages from/to a third person as incentive to achieve something which is dishonest, illegal or breaching confidence within the framework of contractual relations. This refers in particular to:

- Bribery and the acceptance of bribes, excessive gifts or favours in return for PIP support, goods or services
- Granting and receiving advantages, including return parts of contractual payments ("kickbacks")
- Facilitation payments

- Fraud and embezzlement (utilization of the entrusted funds for personal use)
- Agreements reducing competition
- Extortion and money laundering

## Discrimination

Discrimination is an unequal treatment of individuals or groups on the basis of personal characteristics such as disability, appearance and group characteristics, such as ethnicity, religion, etc.

Common forms of discrimination may include, but are not limited to, making employment or programming decisions based on family status, race, minority group, sex, gender, religion or lack of religion, colour, national or ethnic origin, citizenship, language, marital status, birth, sexual orientation, age, disability, political conviction, socioeconomic background, caste, HIV and AIDS status or other illnesses and physical appearance or lifestyle.

Examples of discrimination may include, but are not limited to:

- Programmes not based on proper needs assessment or situational analysis resulting in interventions that benefit men more than women, or vice versa
- Hiring preferences based on one's religion or ethnic group over members of other denominations or groups
- Stigmatization of or service denial to people on the basis of their HIV and AIDS status
- Service delivery only to particular ethnic, religious, or political groups

## Emotional abuse

Emotional abuse is the persistent emotional abuse that can affect a child or the emotional development of a vulnerable adult. Emotional abuses include restraint, humiliation, bullying (including cyberbullying), threats, intimidation, discrimination, mockery, or other non-physical forms.

## Exploitation

Exploitation means using a position of authority, influence or control over resources, to pressure, force, coerce or manipulate someone to do something against his/her will or interest and wellbeing. This includes threatening to withhold project assistance, threatening to make false claims about a person in public, or any other negative repercussions in the work-place or community.

Examples of exploitation include, but are not limited to:

- Offering special benefits to beneficiaries or other programme participants in exchange for expressed, implied or demanded favours (including sexual favours) or benefits, either to the staff member or to a third party
- Threats or implications that an individual's refusal or unwillingness to submit to demands will affect the person's entitlement to project assistance and support, or terms and conditions of employment
- Children's involvement in heavy, dangerous, extended long hours or forced labour
- Selling, buying, and transporting children, women or men by means of coercion or deception for economic or other gains

## Physical abuse

Actual or potential physical harm caused by another person. Physical harm can also be caused when a person intentionally causes illness in a child or vulnerable adult.

## Fraud

Fraud is a theft or misuse of PIP's funds or other resources by a staff member or a third party, which may or may not also involve misstatement of financial documents or records to conceal the theft or misuse.

Examples of fraud include, but are not limited to, the following:

- Theft of funds or any other PIP property
- Falsification of costs or expenses
- Forgery or alteration of documents
- Destruction or removal of records
- Inappropriate personal use of PIP's assets or funds
- Seeking or accepting cash, gifts or other benefits from third parties in exchange for preferment of the third parties in their dealings with PIP
- Blackmail or extortion
- Paying of excessive prices or fees to third parties with the aim of personal gain

## Harassment

Harassment is an unwanted behaviour relating to personal characteristics such as race, membership of a minority group, sex, gender, religion or lack of religion, colour, national or ethnic origin, language, marital status, family status, sexual orientation, age, disability, political conviction, socio-economic background, caste, HIV and AIDS status or other illnesses and, physical appearance or lifestyle which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. Such unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of texts, pictures or other material.

Harassment also includes the less favourable treatment of a person because he or she has rejected or submitted to the type of conduct described above.

Anyone can be a victim of harassment. Harassment may be an isolated incident or repeated actions. It can take many forms and may involve written documents, the use of IT including email, text messaging, photographs or pictures.

Many forms of behaviour may constitute harassment, including:

- Verbal harassment - jokes, comments, ridicule or songs
- Written harassment - text messages, emails or notices
- Physical harassment - jostling, shoving or any form of assault
- Intimidating harassment - gestures, posturing or threatening poses
- Visual displays such as posters, emblems or badges
- Isolation or exclusion from social activities
- Pressure to behave in a manner that the individual thinks is inappropriate – for example, being required to dress in a manner unsuited to a person's ethnic or religious background

## Intimidation

Intimidation is the act of willingly making someone timid, filled with fear or frightened into submission. Intimidation implies inducing fear or a sense of inferiority in another person by threats or inducing fear of the consequences against him/her or their family or friends. Acts of intimidation can be verbal, non-verbal or physical.

## Modern Slavery

Modern slavery refers to situations where one person has taken away another person's freedom – their freedom to control their body, their freedom to choose to refuse certain work or to stop working – so that they can be exploited. Freedom is taken away by threats, violence, coercion, abuse of power and deception.

## Neglect and negligent treatment

It indicates a persistent failure to meet a child's or a vulnerable adult's basic physical and/or psychological needs, which is likely to lead to serious impairment of the child's healthy physical, spiritual, moral and mental development.

## Sexual abuse

Sexual abuse is a threat of or actual physical intrusion of a sexual nature, whether by force, coercion or under unequal conditions. It includes sexual assault or sexual acts to which a person has not consented, could not consent, or was compelled to consent.

## Sexual exploitation

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, to pressure or demand others to provide sexual favours, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of someone else.

## Sexual harassment

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature. A single incident may constitute sexual harassment.

Many forms of behaviour can constitute sexual harassment, including:

- *Physical conduct of a sexual nature*, including unwanted contact such as unnecessary touching, patting or pinching or brushing against another person's body, assault and coercive sexual intercourse.
- *Verbal conduct of a sexual nature*. This may include unwelcome sexual advances, propositions or pressure for sexual activity, continued suggestions for social activity outside the workplace after it has been made clear that such suggestions are unwelcome, unwanted or offensive flirtations, suggestive remarks, innuendos or lewd comments.
- *Non-verbal conduct of a sexual nature*. This may include the display of pornographic or sexually suggestive pictures, objects, written materials, posts on social media, emails or text messages. It may also include leering, whistling or making sexually suggestive gestures.
- *Sex-based conduct*. This may include conduct that denigrates or ridicules or is intimidating or physically abusive of an employee because of his or her sex, such as derogatory or degrading abuse or insults that are gender-related.

## Trafficking in persons

Trafficking in persons means the recruitment, transportation (including failure to provide return transportation), transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.