



cesvi



**PROTECTION FROM SEXUAL
EXPLOITATION, ABUSE AND
HARASSMENT (PSEAH) POLICY**

July 2026

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1. DEFINITIONS AND GOVERNING PRINCIPLES

SEAH: Acronym used to refer to sexual exploitation, abuse and harassment.

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment: Unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours, and sexual, verbal or physical conduct or gestures that are or might reasonably be perceived as offensive, humiliating, or intimidating. Sexual harassment has historically been related to the workplace, but in this Policy, it covers the spectrum of behaviours that constitute unacceptable conduct by CESVI employees, volunteers, consultants, and contractors towards affected populations.

Survivor: A person who has experienced an act of SEAH perpetrated against him/her or an attempt to perpetrate an act of SEAH against him/her¹. For the purposes of this Policy, any person who reports an allegation of SEAH committed against him/her is considered and treated as a survivor while the allegation is being investigated.

Survivor-centred approach: An approach in which the survivor's wishes, safety, empowerment and well-being remain a priority throughout all procedures. The key principles of this approach are:

- Dignity: Survivors have the right to be treated with dignity and respect and shall never be exposed to victim-blaming attitudes;
- Respect the survivor's decision: Survivors have the right to choose how to address the situation so as not to feel further disempowered. If a survivor does not consent to an investigation, their decision shall be respected;
- Safety: Survivor safety is paramount;
- Non-discrimination: all survivors are treated the same, regardless of their age, gender, sexual orientation, race, ethnicity, or any other factors;
- Informed consent: Survivors receive clear and comprehensive information to ensure they can take an informed decision. CESVI personnel involved in the investigation shall never influence or impose a decision on the survivor. For SEAH cases involving child survivors, informed assent shall be collected with the parent/caregiver.
- Confidentiality: SEAH related information shared by the survivor must be kept strictly confidential, identities must be protected and any personal information on the survivor or the allegation shall only be shared with informed consent, and strictly on a need-to-know basis.

Zero Tolerance: A commitment by an organization that sexual exploitation, abuse, or harassment will not be tolerated in any form, and that all allegations will be taken

¹ The person who is, or has been, sexually exploited or abused. This term implies strength, resilience, and the capacity to survive. "The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors, while the term 'survivor' is generally preferred in the psychological and social support sectors because it implies resiliency." See Inter-Agency Standing Committee's Task Force on Protection from Sexual Exploitation and Abuse, "Guidelines to implement the Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel" (March 2013) [hereinafter IASC Guidelines to Implement the MOS-PSEAH (2013)], and IASC GBV Guidelines (2015), Part I - Introduction p. 1.

seriously and addressed promptly, appropriately, and in line with established procedures.

Code of Conduct: A set of standards of behaviour that employees, volunteers, consultants, contractors, and management board of an organization are obliged to adhere to.

Beneficiaries of Humanitarian Assistance: A person who receives assistance as part of either emergency relief or development aid through assistance programmers. The term beneficiary refers to members of affected populations including refugees, internally displaced persons and other vulnerable individuals, as well as host community members.

Aid Worker: A person involved in providing assistance to affected populations and with an ongoing contractual relationship with an organization. The term refers to all staff of humanitarian agencies and organizations (including UN agencies, IGOs, INGOs, LNGOs), paid staff - including incentive workers² from target communities, volunteers, and anyone performing a task on behalf of any humanitarian or development agency or organization, regardless of the type or duration of their contract³.

Associated personnel: All employees of CESVI⁴, CESVI members, affiliates, and collaborators in Country Offices. The term also refers to board members, interns, international and local consultants, contractors, and partners – including non-CESVI entities and their employees and individuals who have entered into partnership with CESVI.

Complainant: A person who brings an allegation of SEAH in accordance with established procedures. This person may be a SEAH survivor or another person who is aware of the wrongdoing. Both the survivor and the complainant, if different from the survivor, should be protected from retaliation for reporting SEAH allegations. Where there is any conflict of interest between the survivor and another interested party, the survivor's wishes must be the principal consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.

Whistleblower: For the purposes of the PSEAH Policy a whistleblower is a type of complainant, other than the survivor, who is a humanitarian aid worker and reports a SEAH allegation. CESVI Whistleblowing Policy requires all staff members to report concerns or suspicions of misconduct by associated personnel, ensures protection from retaliation for reporting, and clarifies the rules and procedures for reporting and addressing such cases. CFM principles (e.g. confidentiality) apply to whistleblowers as they would to any complainant, and internal policies protect whistleblowers from any retaliation, so long as the report is made in good faith.

² Incentive workers are individuals who receive non-monetary compensation for work or representation for an organization, and are frequently members of the beneficiary community. See the Sexual Exploitation and Abuse Glossary at www.interaction.org/document/SEAH-glossary.

³ International Council of Voluntary Agencies, "Building Safer Organizations Guidelines: Receiving and Investigating Allegations of Abuse and Exploitation by Humanitarian Workers" (2007).

⁴ The Foundation's legal name is CESVI Fondazione - ETS or CESVI ETS according to Legislative Decree D.Lgs. 117/17, hereinafter referred to also as "CESVI".

2. SCOPE OF THE PSEAH POLICY

Aid workers are expected to uphold the highest standards of personal and professional conduct at all times to protect beneficiaries of humanitarian and development assistance⁵. Sexual exploitation, abuse, and harassment (SEAH) by humanitarian aid workers directly contradicts the principles upon which humanitarian action and international cooperation are based and represents a protection failure on the part of the aid community. SEAH harms the affected populations that the humanitarian and development community has an obligation to protect and jeopardizes the credibility and accountability of all aid agencies.

In line with its principles of respect and dignity, CESVI requires all its employees and associated personnel to behave irreproachably with project beneficiaries or affected populations, adopting particular care with the most vulnerable groups: minors, women, the elderly, and members of socially discriminated groups (i.e., ethnical minorities, refugees, LGBTQIA+, etc.)⁶. CESVI commits to create a **zero-tolerance** organizational culture against all forms of sexual wrongdoing. CESVI Management, among the others, is expected to create and maintain an environment that prevents sexual exploitation, abuse and harassment. CESVI management staff must be familiar with and enforce this Policy, while proactively overseeing its implementation within their team.

Through the PSEAH Policy, CESVI clearly expresses its commitment to preventing and addressing sexual exploitation, abuse and harassment of beneficiaries and targeted affected populations by CESVI employees and associated personnel. This is also intended to include employees and associated personnel of partners that have entered into an agreement with CESVI.

CESVI SEAH Policy sets minimum standards to be followed to protect beneficiaries and targeted affected populations from sexual exploitation, abuse and harassment. This Policy is addressed and applies to all CESVI employees and associated personnel including:

- Board of Directors and CESVI Management;
- Employees and collaborators in all CESVI offices and projects in Italy and abroad;
- Non CESVI entities and their employees and individuals who have entered into partnership with CESVI, including committees and associations of any sort supported, financially or otherwise, by CESVI in Italy and abroad;
- Consultants and other freelance providers – understood as consultants and providers of intellectual services) – who act on behalf of CESVI on the basis of service contracts;
- Volunteers acting on behalf of CESVI ETS;
- Suppliers of goods, services, or works, including current and potential suppliers.
- Any other person not included in the above-mentioned categories who has signed a contract with CESVI.

⁵ Protection against Sexual Exploitation and Abuse (PSEAH). Inter-agency cooperation in community-based complaint mechanisms. Global Standard Operating Procedures, May 2016.

⁶ CESVI Ethical Code, 2024.

The principles and behaviours set forth in this Policy shall apply at all times, during and outside office hours, and during periods of leave.

3. POLICY STATEMENT

SEAH violates CESVI Ethical Code and Code of Conduct. This Policy upholds CESVI zero-tolerance towards SEAH and states that CESVI does not tolerate any form of sexual exploitation, abuse and harassment, as well as bullying and a range of non-sexual abuse of power perpetrated by CESVI employee and associated personnel against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin.

CESVI is committed to taking all necessary measures to prevent any form of harm, including the risk of sexual exploitation, abuse, and harassment, that may be caused by its employees or associated personnel to beneficiaries and members of the community.

CESVI takes seriously all the complaints and concerns about sexual exploitation, abuse, and harassment, and it initiates a rigorous investigation of complaints to confirm the possible violation of this Policy, CESVI Code of Conduct and CESVI Ethical Code.

This policy complements, without replacing:

- CESVI Ethical Code
- CESVI Staff Code of Conduct
- CESVI Child Safeguarding Policy
- CESVI Diversity, Equity and Inclusion Policy
- CESVI Human Resources Policy

4. CORE PRINCIPLES⁷

1. Sexual exploitation, abuse, and harassment by CESVI employees and associated personnel constitute acts of serious misconduct and are therefore grounds for disciplinary actions, including the termination of the employment contract within the applicable and current regulations and in compliance with CESVI HR Policy and Code of Conduct;
2. Sexual activity with children (defined as persons under the age of 18) is strictly prohibited regardless of the legal age or age of consent at the local level. Mistaken belief regarding the age of the child shall not be considered as a defence and in no way shall ignorance on the age of the child be accepted as a justification. CESVI Child Safeguarding Policy further set the principles and operationalizing procedures and guidelines for guaranteeing children safeguarding in all domains of CESVI action⁸;
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is

⁷ 1-6: The six Core Principles are from the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13). They have been updated in line with the IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019 and modified based on CESVI ETS structure and activities.

⁸ CESVI ETS adheres to the Keeping Children Safe global network. CESVI ETS Children Safeguarding Policy is in force since 2019 and has been revised in May 2024.

prohibited;

4. Any sexual relationship between CESVI staff and a person benefitting from aid assistance that involves improper use of power is prohibited. This relationship undermines the credibility and integrity of the assistance provided to targeted affected populations;
5. Whenever CESVI employees and/or associated personnel have concerns or suspicions regarding sexual abuse or by a fellow worker, whether the individual works for CESVI or other organization, partner, supplier, or stakeholder, he/she must report such concerns through the channels and tools available within the Organization.
6. All CESVI staff members, regardless of their position, are required to create and maintain an environment that prevents sexual exploitation, abuse, and harassment, and promote the implementation of the Code of Conduct and Ethical Code.

When appropriate, CESVI ensures that SEAH cases are reported to the competent authority for criminal prosecution and legal action in accordance with the applicable law and considers acting as a civil injured party in the proceedings.

5.COMMITMENTS

The creation of a safe organization free from sexual exploitation, abuse and harassment extends beyond the development and application of Policies and Procedures. CESVI commits to mainstreaming protection from sexual exploitation, abuse, and harassment (PSEAH) in its organizational culture and practices. Prevention becomes inherent in CESVI way of working, stimulating debate on the topic, providing training, actively involving stakeholders – in particular beneficiaries – and constantly monitoring and evaluating applicable processes.

The PSEAH Policy defines the highest standards of professional behaviour and procedures to ensure that no individual can be harmed while participating in or benefiting from CESVI's programmes and activities.

CESVI's commitment to preventing sexual exploitation, abuse, and harassment is defined through four main areas:

- **Awareness:** CESVI ensures that all employees, associated personnel, as well as targeted communities and beneficiaries, are aware of the risks and implications of sexual exploitation, abuse, and harassment. Beneficiaries and communities are informed of the organization's commitment to preventing all forms of SEAH through sensitization and awareness sessions on available mechanisms and channels, which can be used to report any concerns and/or allegations.
- **Prevention:** CESVI works to minimize risks through rigorous recruitment processes, the assessment of safeguarding risks at project or programme level, the establishment of safe partnerships that integrate SEAH considerations, and the provision of dedicated training to staff and associated personnel.
- **Reporting:** CESVI ensures that reporting procedures are clear and that all staff

and associated personnel know how to appropriately receive (in case of disclosure), address and escalate concerns related to sexual exploitation, abuse and harassment.

- **Responding:** CESVI guarantees that all necessary actions are taken to support and ensure the safety, wellbeing, and rights of the survivor, while initiating appropriate organizational procedures.

By integrating these commitments into every layer of the organization, CESVI not only adheres to international standards but also promotes a culture of safety, respect, and dignity for all individuals involved in or affected by its operations.

6.AWARENESS

- All CESVI employees shall be aware of the Core Principles included in this Policy and in CESVI Staff Code of Conduct and Ethical Code.
- CESVI commits to increasing awareness of its employees and collaborators – including volunteers, partners, suppliers, and contractors – on sexual exploitation, abuse, and harassment.
- As far as the dissemination of this Policy is concerned, CESVI commits to providing a thorough induction session for all new staff, tailored to different levels of responsibility, and regular refresher trainings. These training sessions focus on understanding the risks, preventive measures, and response procedures associated with sexual exploitation, abuse, and harassment.
- When CESVI enters a partnership with other organizations, it ensures that PSEAH considerations are fully integrated across all phases through due diligence processes, partnership agreements, and Memorandum of Understanding. CESVI assesses the partners' implementation of Safeguarding Policies (Child Safeguarding and PSEAH Policy). Where gaps or shortcomings are identified, CESVI ensures that safeguarding measures are incorporated into capacity strengthening plans to enhance partners' technical capacities and accountability towards affected populations. Failure to comply with PSEAH Policy requirements may ultimately lead to the termination of the partnership.
- The content of this Policy is translated into local languages and disseminated using appropriate communication languages, formats, and media that are easily understood, respectful, and culturally appropriate for different communities and affected persons, especially vulnerable and marginalized groups.

Communities where CESVI operates are made aware of the safeguarding commitment and PSEAH policy provisions, including how to report safely and confidentiality any concern to the organization.

7.PREVENTION

- CESVI ensure to apply the highest standards in its recruitment processes to prevent sexual exploitation, abuse, and harassment. This includes ensuring that all vacancy advertisements mention CESVI's zero-tolerance statement and screening all

candidates to assess their suitability to work in sensitive environments.

- During the recruitment process, CESVI conducts comprehensive background checks and verifies references to assess any history of abuse, exploitation, or harassment and ensures that all newly recruited personnel receive orientation on CESVI's Safeguarding Framework.
- To ensure that the organization does not employ individuals with a history of abuse and to deter those with previous convictions from applying, appropriate checks are conducted. These include requesting a self-declaration on criminal convictions to all new staff. In case the new staff works in contact with minors (i.e., individuals under the age of 18) or vulnerable populations (i.e., GBV survivors, and individuals at heightened protection risks), CESVI shall request a copy of the criminal record.
- A Code of Conduct and Safeguarding Framework is in place and duly shared with employees, volunteers, and consultants. It establishes the obligation for all employees, and collaborators not to exploit, abuse, harass, or otherwise perform discriminative acts against people. All CESVI employees, and collaborators are required to behave irreproachably with project beneficiaries or members of targeted communities.
- The Ethical Code is published on the CESVI website and is disseminated and duly known to everyone who collaborates in any way with CESVI. The Ethical Code contains the mission, the vision, the declaration of values and principles, the set of rights, duties and responsibilities that whoever collaborates with CESVI or benefits from its projects or programs is expected to uphold.
- All the newly recruited personnel, including volunteers, sign and accept to abide to the PSEAH Policy and receive an induction training that introduces them to the obligations arising from the Policy – including, among others, the obligation to report SEAH concerns, available reporting channels, and the implications of breaching Policy provisions.
- CESVI Senior Management takes responsibilities to oversee the correct implementation of PSEAH measures. Table 1 details the responsibilities for each staff category.
- CESVI ensures that a Safeguarding Focal Point at HQ level is appointed. The Focal Point supports HQ and country mission teams in the implementation of the Safeguarding Policies (CS and PSEAH). Duties, skills and responsibilities of the Focal Point are detailed in Appendix 1. Additionally, CESVI country mission teams, after consultation with the HQ Focal Point, appoint a staff member at the country level to serve as Country Safeguarding Focal Point (CSFP). ToRs of the CSFP are described in Appendix 2.
- CESVI is responsible to engage local communities in the prevention and response to sexual exploitation, abuse, and harassment. To ensure efficacy of its engagement, CESVI shall communicate in languages, formats and media that are easily understood, respectful and culturally appropriate among different targeted communities, also ensuring inclusion and representation of vulnerable and marginalized groups. Local communities shall be consulted in the development and

approval of Complaints and Feedback Mechanism (CFM), to ensure that the CFM is both culturally and gender sensitive.

- CESVI is responsible to ensure that all third parties, including partners and contractors, are committed to uphold the principles included in the PSEAH Policy, in addition to those detailed in CESVI Ethical Code. Partner organizations working with CESVI shall either have their own PSEAH Policy – aligned with CESVI’s commitments and requirements or abide by CESVI’s Policy throughout the duration of the partnership. The adoption of CESVI safeguarding standards is ensured through the signature of the MoU that makes explicit reference to CESVI CS and PSEAH Policies and its application and respect. The non-fulfilment of the PSEAH Policy provisions by the partners can be consider as a ground for the termination of the partnership.
- In case of Consortia, when CESVI is the Consortium Leader, CESVI PSEAH Policy applies to all Consortium members, if no different agreement is reached by partners. If CESVI is not the Leading Agency then, attempts should be made to include safeguarding provisions within the agreement, trying to reach the highest protection standards. The non-fulfilment of the PSEAH Policy provisions by the partners can be consider as a ground for the termination of the partnership.
- As far as suppliers and contractors are concerned, the acceptance of the CESVI PSEAH Policy is a mandatory condition to undertake any contractual relation with CESVI. This is ensured through an explicit reference to the Policy in the contracts concluded with suppliers and contractors. Safeguarding Policies are also annexed to the contract agreement.

Table 1: Staff responsibilities

ROLE	RESPONSIBILITY
All staff members – including volunteers and consultants	• Adhere to PSEAH Policy and Code of Conduct and report concerns of misconduct.
All Managers	• Ensure all new employees receive the safeguarding training as part of their induction; • Ensure PSEAH measures are implemented within their area of responsibility; • Ensure safeguarding measures are integrated with existing processes and systems (strategic planning, budgeting, recruitment, programme cycle management, performance management, procurement, partner agreements etc.); • Follow up and address safeguarding issues appropriately;
HR staff	• Implement necessary measures when recruiting new staff and volunteers; • Document who has received training on safeguarding; • Ensure all new employees receive a copy of PSEAH prior to – or at the time of – issuing an employment contract. Adherence to the Policies must be included in the contract formats of all employees.
Programme staff	• Ensure that targeted communities are aware of the PSEAH Policy and how to report concerns.

8.REPORTING

- Policy addressees have the duty to report any violation of this Policy, including any situation in which beneficiaries may be, or are at risk of abuse and harm. Reports

shall be done as soon as addressees become aware of such risks or violations.

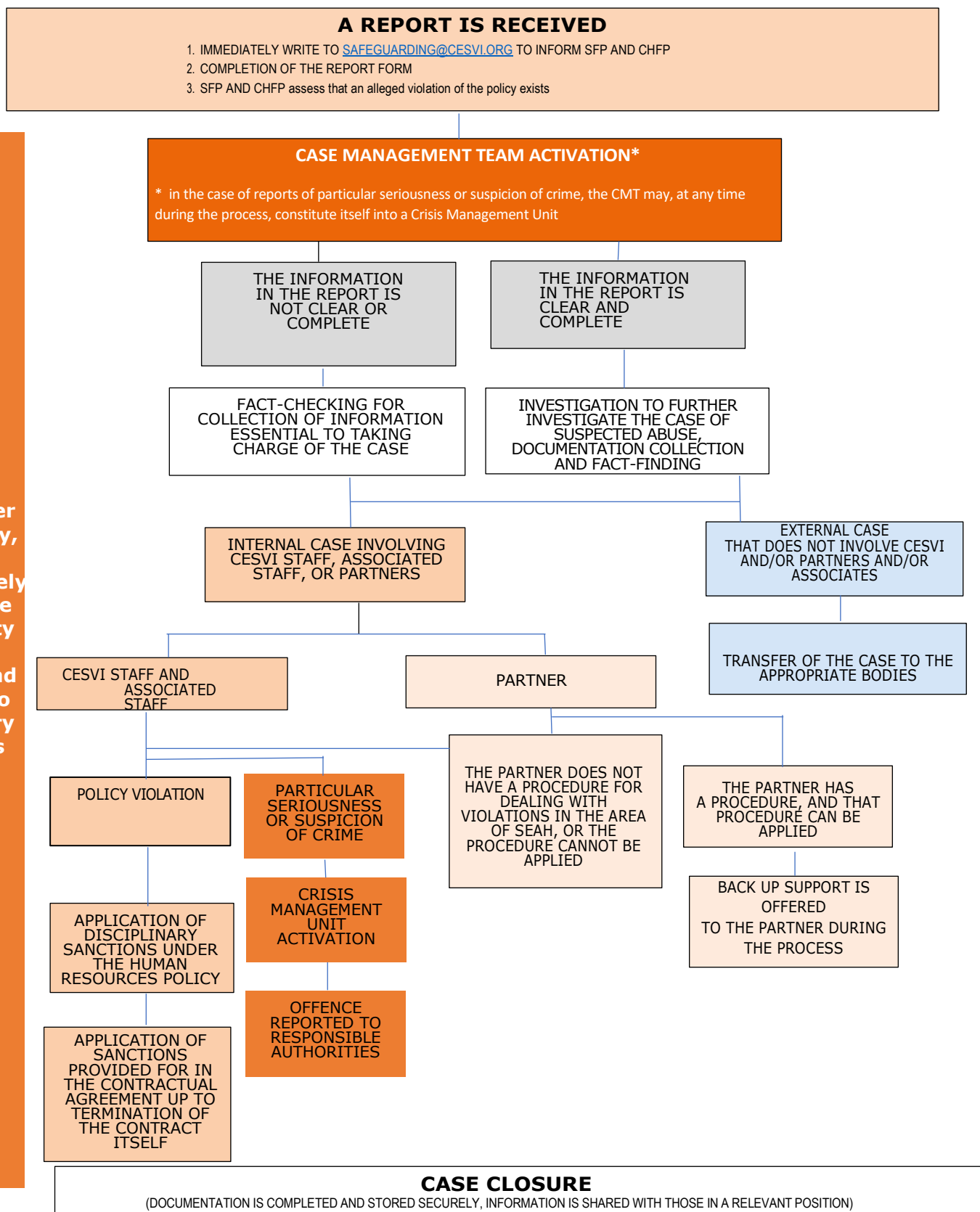
- CESVI has established clear, accessible, and confidential mechanisms for reporting sexual exploitation, abuse, and harassment. These include designated email addresses, confidential hotlines, and direct contact with trained personnel who manage reports.
- At HQ level a dedicated email has been established to report safeguarding related complaints, including SEAH allegations: safeguarding@cesvi.org. Any violation of the provisions of CESVI's policies and procedures, including the PSEAH Policy, can also be reported through CESVI whistleblowing channels:
 - E-mail: whistleblowing@cesvi.org
 - Digital platform available at this link: <http://www.cesvi.org/cesviwhistleblowing>
- At Country level a Complaints and Feedback Mechanism (CFM) for reporting sexual exploitation, abuse, and harassment is in place and accessible. This CFM shall not be considered a separate, parallel system to other complaints and feedback mechanisms in a given area but rather a link to build on and strengthen existing structures, while ensuring that are context and culturally appropriated, and accessible to vulnerable groups (e.g., children, persons with disabilities or physical impairments, etc.). To ensure appropriateness, sensitivity, and inclusion, the CFM should be developed in collaboration with local communities and representatives of vulnerable groups.
- Reporting mechanisms are communicated widely across all levels of CESVI's operations to ensure that everyone, including beneficiaries and targeted communities, understands how to report incidents or concerns and are confident in the system's ability to protect reporters from retaliation.
- Reports are handled with confidentiality, with swift actions taken to address the report while protecting the rights and dignity of all parties involved.
- Complainants and survivors have the right to receive feedback on the development and outcome of their case.

9. RESPONSE

- CESVI ensures to set protocols to process complaints of sexual exploitation, abuse, and harassment in a timely manner, including the immediate suspension of the alleged perpetrator from all the activities with a direct impact on beneficiaries and communities until the investigation is closed.
- Upon receiving a report of an alleged sexual exploitation, abuse, and harassment, CESVI promptly activates a Case Management Team (CMT), responsible to oversee the investigation process under the coordination of the Complaints Handling Focal Point. The CMT nominates the investigation team responsible to conduct the investigation. If there is a suspicion of criminal relevance of the case, or if the team assesses that the report is of a serious nature or impact to the individuals involved or to the organization, the CMT will form a Crisis Management Unit (CMU). Details on the composition of the CMT and CMU are available in Appendix 3.

- If the CMT or the CMU consider that there has been a potential violation of the national or Italian legislation, CESVI, in accordance with the applicable legislation, ensures that the competent authority is informed. In this case, the involvement of the survivor is paramount to ensure that he/she can make an informed decision on how to proceed with the complaint.
- CESVI ensures that confidentiality is maintained at all stages of the investigation and that information is shared on a need-to-know basis only.
- The investigation process must follow a survivor-centred approach to ensure that it keeps survivors at the forefront, providing a supportive environment that promotes their safety and empowerment. All survivors shall receive equal and fair treatment regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation or any other characteristic.
- Survivors shall always be involved in decision making and be provided with comprehensive information. All actions taken shall be guided by respect for the choices, wishes, rights, and dignity of the survivors.
- CESVI ensures the protection of the survivor, the complainant and the whistleblower of SEAH through the provision of required assistance, including psychosocial counselling, medical treatment, legal assistance to the survivors of sexual exploitation, abuse and harassment.
- Retaliation is prohibited. Any attempt of intimidation, victimization or retaliation towards a complainant, witness or any other party involved in the reporting and responding phases is considered an act of serious misconduct.
- The individual alleged to have violated this Policy should have the opportunity to present his/her view of the events. Should allegation be confirmed, CESVI ensures to take appropriate disciplinary actions, including immediate termination of employment and referral for criminal prosecution and legal action, where appropriate, against the perpetrator of sexual exploitation, abuse, and harassment, in accordance with national laws reporting and responding systems.
- Should, at the end of the preliminary inquiry, the report show to be self-serving or intentionally false, the disciplinary steps indicated in the Human Resources Policy will be taken against the person who submitted the report, and a crime complaint will be made to appropriate authorities, in case of crime.

10. PROCEDURES FOR MANAGING SEAH RELATED ALLEGATIONS



Whenever necessary, act immediately to ensure the safety of the victim and access to necessary services

11. APPENDIXES

Appendix 1 – Role and responsibilities of Safeguarding Focal Point

The Safeguarding Focal Point is a designated person responsible for overseeing the implementation of the Child Safeguarding Policy and the PSEAH Policy.

CESVI requires that a Safeguarding Focal Point is appointed at every level and setting (i.e., at the HQ and country mission levels) to ensure that staff, beneficiaries, and stakeholders can raise safeguarding concerns. To ensure the effectiveness of this position, the contact details of the Safeguarding Focal Point are clearly communicated both internally and externally. The designated Safeguarding Focal Point is responsible for collecting and hearing of any alleged abuses or cases of misconduct within the Organisation, and then of dealing with and addressing the concerns and allegations.

ROLE OF THE SAFEGUARDING FOCAL POINT:

- Take a lead role in raising awareness about the organization's Safeguarding system (CS and PSEAH), and provide training and advice to employees, volunteers, and consultants on the available Safeguarding measures;
- Work with staff to ensure that programmes and operations integrate safeguarding measures in all activities;
- Promote the participation of project beneficiaries throughout the entire project cycle to ensure that they are aware of the Organisation's Safeguarding measures and Code of Conduct – including all reporting mechanisms – and of their right to protection;
- Act as a Focal Point to receive information about the SEAH and Child Safeguarding concerns;
- Work with programme managers to establish community-level complaints mechanisms that facilitate reporting of concerns and allegations made by beneficiaries;
- Ensure that all concerns and allegations are recorded in the safeguarding incident form and referred to the Case Management Team (HQ);
- Plan and participate in any investigation regarding an incident;
- Maintain the safeguarding incident tracker;
- Provide overall support to the wider implementation of policies and procedures in order to safeguard children and vulnerable adults;
- Assess safeguarding risks within the organisation, including in its programmes and projects;
- Consult with local agencies whenever necessary and gather up-to-date information about service provision;
- Ensure that referral pathways for Child Safeguarding and SEAH responses are updated;
- In consultation with the Crisis Management Unit, make a formal referral to a statutory agency (e.g. police) or other organisations, if applicable.

SKILLS OF THE SAFEGUARDING FOCAL POINT:

- Have knowledge and experience on Child Protection, GBV, Child Safeguarding,

PSEAH;

- Be able to maintain confidentiality in information management and communication, as appropriate;
- Have good communication and relation skills;
- Have good analytical skills to assess capacity building needs and based on that, develop and deliver a range of capacity building interventions;
- Have good oral and written communication skills that adapt to large and different audiences and deliver messages effectively.

Appendix 2 – Term of Reference Country Safeguarding Focal Point

The Country Safeguarding Focal Point (CSFP) is a designated person who provides overall support to the implementation of CESVI Safeguarding Policies and Procedures at country level.

The CSFP is responsible for receiving and addressing any information or reports of abuse-related concerns at the country level. He/she collaborates with the HQ Safeguarding Focal Point to support the analysis and management of cases involving suspected abuse and/or violations of the Safeguarding Policies.

ROLE OF THE SAFEGUARDING FOCAL POINT:

- Take a lead role in raising awareness about the organization's Safeguarding measures at country level;
- Ensure public display of the CS Policy, PSEAH Policy, Code of Conduct, and Reporting Process Flow Chart in the Country Office;
- Provide training and advice to staff, volunteers, consultants, and partners on their roles and responsibilities in identifying safeguarding risks, preventing incidents, and reporting safeguarding concerns;
- Ensure that a Safeguarding complaints handling mechanism is available and updated;
- Support the process of safeguarding risks assessment during the project/program proposal designing phase;
- Work with managers/staff to ensure that programmes and operations integrate safeguarding measures in all activities;
- Locally receive any report of suspected abuse, mistreatment, sexual exploitation, or harassment;
- Collaborate with the HQSFP and Case Management Unit, when needed;
- Maintain and update the safeguarding incident tracker at country level;
- Ensure that referral pathways for safeguarding responses are updated.

The CSFP is formally responsible for carrying out the above-mentioned activities and actions. The Head of Mission holds the ultimate responsibility for ensuring that these duties are effectively implemented and that safeguarding standards are upheld at country level.

Appendix 3 – Composition of the CMT and CMU

The **CASE MANAGEMENT TEAM (CMT)** is composed of:

- HQ Safeguarding Focal Point
- Area/Regional Manager
- Head of Human Resources
- Complaint Handling Focal Point
- Legal & Compliance Manager
- Security Advisor

When necessary, other internal functions and/or external professionals can be involved.

Within the framework of the investigation the team consults internally:

- To evaluate the reasons for suspicion;
- To evaluate the severity of the incident;
- To confirm the degree of urgency;
- To reach a decision on whether an investigation should be undertaken or not;
- To elaborate an action plan with timing, role and responsibilities to deal with the case.

The CMT is also in charge of appointing the team responsible to conduct the investigation on suspected cases of abuse. Following the investigation, the CMT will decide whether the suspicion is dispelled, whether a violation of the Policy has been found, and whether the suspicion of a criminal offence is founded. Further measures are taken according to these evaluations.

If the allegation concerns one of the countries in which CESVI operates, the CMT might consider the involvement of some representatives of the country team (i.e. CSFP, HR Manager, HoM) in one or more phases of the investigation process. In any case, the CMT will maintain the leadership of the investigation. The investigation shall be conducted in accordance with national legislations and procedures.

If the investigation confirms a violation of the Code of Conduct, the CMT presents its findings to the General Manager, who is responsible for deciding on any disciplinary sanctions, in line with the Human Resources Policy.

The **CRISIS MANAGEMENT UNIT (CMU)** is composed of:

- CMT
- General Manager
- Head of International/National Programme Department
- Fundraising, Communication & Marketing Director

When necessary, other internal figures and/or other external professionals can be involved. The CMT is constituted into the CMU when the case may anticipate criminal relevance or presents a serious incident, by nature or impact, that may seriously affect either the persons involved or the organization.

In addition to the functions of the CMT, the CMU has four main tasks and responsibilities:

- Contact, in agreement with the Board of Directors, the police and/or other relevant authorities to report the incident;

- Verify obligations to relevant entities and stakeholders, including donors, networks, statutory bodies to make them aware of the facts;
- Activate the Crisis Communication Strategy of the organization;
- Report the incident to CESVI President and Board of Directors.

The General Manager, unless objections are raised by the Board of Directors, may take all necessary decisions and measures.

In cases where a suspected abuse involves a partner organization, and the partner is unable to provide an adequate response in line with SEAH investigation standards, the investigation shall be undertaken by CESVI, with the involvement of one designated representative from the partner organization.

Appendix 4 – COUNTRY ANALYSIS

Country:	
Date of context analysis:	
Safeguarding focal person:	
Other authors / contributors:	

Section 1: Country legislation	
Details of any government bodies or organisations with statutory authority for the safeguarding of children or adults	
Summary of legislation governing welfare /safeguarding /protection of children and adults.	
International conventions on welfare / safeguarding /protection of children and adults, to which the country is a signatory or has ratified. (For example, UN Convention on Rights of the Child; Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), Declaration on the Elimination of Violence against Women)	
Brief analysis of extent of implementation /enforcement of legislation, as far as this is known.	
Local police position on investigation of criminal assault against children and vulnerable adults and likelihood of prosecution of such offences.	
Legal age of consent, and of marriage, in country and legislation covering this.	

Section 2: Community attitudes, customs and practices	
Identify any harmful practices such as early marriage or female genital mutilation, and details of any locations where this is known /believed to be particularly prevalent.	
Any informal observations on attitudes or behaviours seen in country that may cause harm to children and adults.	
Details of any informal or community-based justice and safeguarding mechanisms and how these function.	

Section 3: Other organisations (health /welfare services, NGOs, networks and alliances)
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Details of health, welfare and other services that may be accessed as part of safeguarding response, including for survivors' support.	
Details of NGOs and other organisations, working in the country on child protection /rights, GBV or on aid programmes that include children and adults at risk. Include any local arrangements for dealing with safeguarding issues, HIV, women's centres /refuges or safe housing.	
Details of any academic institutions working on the rights of children and adults.	
Details of any professional networks /alliances involved in safeguarding, women and child protection and rights.	

Appendix 5 – SAFEGUARDING INCIDENT REPORT

SAFEGUARDING INCIDENT REPORT	
Name of the person completing the form	
Position	
Report Date	
Country	
Please categorize the incident	
☐ Physical violence ☐ Emotional or psychological abuse ☐ Sexual abuse ☐ Sexual exploitation ☐ Sexual harassment ☐ Serious neglect ☐ Other (please specify)	
Allegation details	
Date of receipt of the allegation	
Time	
Location	
Name(s) of the referrer (optional)	
Role of the referrer (in case the referrer is a staff member)	
Address of the referrer (if known)	
Contact of the referrer	
Relationship to the survivor (if different from the survivor)	
Survivor details (if available/if informed consent was given⁹)	
Name	
Age	
Gender	
Address (if known)	
Language spoken	
Disability or other special needs?	
Is the survivor a program participant?	Yes No
In the case of a child, with whom does he or she live?	
In your opinion, would it be safe to contact the survivor? Is the survivor aware of the report being made?	Yes No Yes No
Any other information:	
Contact information about parent/caregiver (for children under 18 and vulnerable adults if known)	
Name	

⁹ In case the complainant/survivor does not provide consent for the specific information of the case to be shared within the organization, you should inform them once again on your duty to report allegations of SEAH and child safeagurding. In this case, the complaint will be referred to the safeguarding focal point without their personal identifying information. While the survivor has the right to not to be involved in the investigation process of the case and to dictate their level of involvement, typically, at minimum, complainant's contact information (if different from the survivor) is required for an investigation to take place. If the survivor is also the complainant and does not consent to sharing their personal information, they should be informed of the challenges this presents for follow-up and investigations. It is important to do so in a non-pressuring way with the goal of simply informing the survivor.

Address (if known)	
Contact number	
Have they been notified of the incident?	☐ Yes (Explain comments/actions agreed) ☐ No (Explain why not)
Incident details	
Date of incident	
Time of incident	
Location of incident	
How did you come to have a concern: was abuse observed or suspected? Was an allegation made?	
Details of the incident (information observed or been reported)	
External interventions (local community, authorities, religious leaders, press...)	
Other present or potential witnesses or person aware of the incident (specific name, contact details if available)	
Is the survivor currently safe?	☐ Yes ☐ No (explain what security measures are required) ☐ Do not know
Any relevant information about the survivor physical and psychological condition	
Survivor's quotes if available:	
Alleged Perpetrator's details (if known)	
Name	
Is he/she a Cesvi employee?	
Position	
Relationship, if any, with the survivor	
Current location of alleged perpetrator (if known)	
Other information (features and appearance)	
Has the incident been reported or referred, to whom and how?	
Report to the local police	
Report to the local authority for child protection/welfare	
Referral for medical treatment/to meet health needs	
Referral for psychological support	
Referral for legal support	
Another third party (please specify)	
Any other type of support required	
Notes and comments, actions required, next steps	
Attachments	

Name and Signature of the person completing the form

12. REFERENCES

CESVI Ethical Code

CESVI Staff Code of Conduct and Human Resource Policy

CESVI Whistleblowing Policy

CESVI Child Safeguarding Policy

CESVI Diversity, Equity and Inclusion (DEI) Policy

CPWG, The Child Protection Working Group, Minimum Standard for Child Protection in Humanitarian Action, 2012

Core Humanitarian Standard on Quality and Accountability (CHS)

Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, Lanzarote Convention, 25th April 2007

Protection against Sexual Exploitation and Abuse (PSEA). Inter-agency cooperation in community-based complaint mechanisms. Global Standard Operating Procedures, May 2016

Secretary General's Bulletin on SEA ST/SGB/2003/13, 2003

The Sphere Project, Humanitarian Charter and Minimum Standard in Disaster Response, 2004, and successive editions

Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel, 4 December 2006

UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

IASC PSEA Global Standard operating procedures, June 2016

IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019

Protection against Sexual Exploitation and Abuse Statement by the Inter-Agency Standing Committee (IASC) Principals 2015

UN Office of High Commissioner for Human Rights, *CRC - Convention on the Rights of the Child*, 1989



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