



Cesvi



**PROTECTION FROM SEXUAL  
EXPLOITATION AND ABUSE (PSEA)  
POLICY**

**May 2024**



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# 1. DEFINITIONS

**SEA Sexual Exploitation and Abuse:** Particular forms of gender-based violence that have been reported in humanitarian contexts, specifically alleged against humanitarian workers.

**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 versus SEA:** SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff, and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. Sexual harassment is not covered by SEA

**Survivor:** A person who has SEA perpetrated against him/her or an attempt to perpetrate SEA against him/her.<sup>1</sup> For the purposes of these SOPs, persons who report SEA committed against themselves are treated as survivors for the purposes of security and needs assessments

**Code of Conduct:** A set of standards of behavior that staff 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. Persons under this title include members of affected populations including refugees, internally displaced persons and other vulnerable individuals, as well as host community members. Sexual exploitation or abuse of a beneficiary is SEA, however the individual need not be in a vulnerable position; a differential power or trust relationship is sufficient to establish SEA.

**Humanitarian Aid Worker:** all persons involved in providing protection and/or assistance to affected populations and who have a contractual relationship with the participating organization/partners, including incentive workers<sup>2</sup> from target communities. It refers to all staff of humanitarian agencies and organizations, including UN agencies, IGOs, NGOs, implementing partners, including paid staff, volunteers, contractors, incentive workers, and anyone performing a task on behalf of any humanitarian agency or organization, regardless of the type or duration of their contract.<sup>3</sup>

**Relate personnel:** all employees of CESVI ETS<sup>4</sup>, CESVI Members, affiliates and collaborator in Country Offices. The term also includes board members, volunteers, interns, and international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This includes non-CESVI entities

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<sup>1</sup> 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-PSEA (2013)], and IASC GBV Guidelines (2015), Part I - Introduction p. 1.

<sup>2</sup> 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/sea-glossary](http://www.interaction.org/document/sea-glossary).

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

<sup>4</sup> 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".

and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with CESVI ETS.

**Complainant:** a person who brings an allegation of SEA in accordance with established procedures. This person may be a SEA 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 SEA. Where there is any conflict of interest between the survivor and another interested party, the survivor's wishes must be the principle consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.

**Whistleblower:** For the purposes of SEA Policy a whistleblower is a type of complainant, not the survivor, who is a humanitarian aid worker making a report of SEA. Organizational whistleblowing policies encourage staff to report concerns or suspicions of misconduct by colleagues by offering protection from retaliation for reporting, and clarify the rules and procedures for reporting and addressing such cases. Therefore, the definition, scope, and protection measures may differ between organizations. CFM principles (e.g. confidentiality) apply to whistleblowers as they would to any complainant, and internal agency policies shall protect whistleblowers on SEA from retaliation, so long as the report is made in good faith and in compliance with internal agency policies.

## 2. SCOPE OF THE PSEA POLICY

Humanitarian aid workers are expected to uphold the highest standards of personal and professional conduct at all times to protect beneficiaries of assistance<sup>5</sup>. Sexual exploitation and abuse (SEA) by humanitarian aid workers directly contradicts the principles upon which humanitarian action is based and represents a protection failure on the part of the aid community. SEA harms those whom the humanitarian community has an obligation to protect, and jeopardizes the credibility of all aid agencies.

All CESVI ETS (herein after referred as CESVI) employees and related personnel are required to behave irreproachably with the project beneficiaries or members of the community, using particular care with the most vulnerable groups: minors, women, the elderly and social outcasts.<sup>6</sup> CESVI commits to create a zero-tolerance organizational culture against complacency and impunity. CESVI Management, among the others, is expected to create and maintain an environment that prevents sexual exploitation and abuse. CESVI management staff must be familiar with and enforce this policy, being proactive in overseeing their team.

Through the Protection from Sexual Exploitation and Abuse Policy, CESVI clearly expresses its determination to prevent and combat sexual exploitation and abuse of beneficiaries and members of the community by CESVI employee and all related personnel.

CESVI SEA policy sets minimum standards to be followed to protect beneficiaries and members of the community from sexual exploitation and abuse.

The policy is principally addressed all CESVI employee and related personnel included in the following categories:

- ❖ Board of Directors and CESVI Management;
- ❖ All the employees and collaborators in all CESVI structures and projects in Italy and abroad;
- ❖ Non CESVI entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipients agreement with CESVI ETS, committees, associations of any sort – including their members and staff – supported, financially or otherwise, by CESVI in Italy and abroad;
- ❖ Consultants and other freelance persons who act on behalf of CESVI on the basis of service contracts (understood as consultants and providers of intellectual services);
- ❖ all persons acting voluntarily on behalf of CESVI ETS;
- ❖ Suppliers of any sort of goods, services, or works, including current and potential suppliers.
- ❖ All the other people not included in the above-mentioned categories who have signed a contract with CESVI ETS.

**The principles set forth in this policy apply all times, during and outside the office hours and during the periods of leave, with no exceptions.**

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

<sup>6</sup> CESVI Ethical Code, 2024.

### 3. POLICY STATEMENT

SEA are violations of CESVI Ethical Code and CESVI Code of Conduct.

CESVI does not tolerate any form of sexual exploitation and abuse, as well as bullying and a range of non-sexual abuse of power perpetrated by CESVI employee and related personnel against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin.

CESVI commits to do all the needful for preventing programmes having any negative effects such as SEA by CESVI employee and relate personnel against beneficiaries and members of the community. CESVI takes seriously all the complaints and concerns about sexual exploitation and abuse and it initiates rigours investigation of complaints that indicates a possible violation of this policy, CESVI Code of Conduct and CESVI Ethical Code.

### 4. CORE PRINCIPLES<sup>7</sup>

1. Sexual exploitation and abuse by CESVI employee and related personnel constitute acts of gross misconduct and are therefore grounds for disciplinary actions and/or termination of employment contract within the applicable and current regulations;
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense and in no way shall ignorance of the age of the person be accepted as a justification. A specific Children Safeguarding Policy further set the principles and the operationalizing procedures and guidelines for guaranteeing children safeguarding in all domains of CESVI action;<sup>8</sup>
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries;
4. Any sexual relationships between CESVI ETS staff and person benefitting from the assistance that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of the Humanitarian aid work;
5. Where CESVI employee and related personnel develops concerns or suspicions regarding sexual abuse or by a fellow worker, whether the individual works for CESVI or for other organization, partners, suppliers or other related

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<sup>7</sup> 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.

<sup>8</sup> 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.

stakeholders, he or she must report such concerns through the means and tools available within the Organization.

6. All **CESVI** staff members, whatever their levels are obliged to create and maintain an environment that prevent sexual exploitation and abuse and promotes the implementation of the Code of conduct and Ethical Code.

When appropriate, CESVI ensures to report for criminal prosecution and legal action to the competent authority in accordance with the applicable law and evaluates proceedings as a civil damaged party.

## 5. COMMITMENTS

The creation of a safe organization free from sexual exploitation and abuse extends beyond the development of policies and procedures. Therefore, CESVI commits to mainstreaming protection from sexual exploitation and abuse (PSEA) in its organizational culture and practices. Prevention becomes inherent in our way of working, stimulating debate on the topic, providing training, actively involving stakeholders—particularly beneficiaries—and constantly monitoring and evaluating our processes.

The PSEA 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 programs and activities.

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

- **Awareness:** CESVI ensures that all staff, associates, as well as communities and beneficiaries, are aware of the risks and implications of sexual exploitation and abuse.
- **Prevention:** CESVI works to minimize risks through rigorous recruitment, continuous education, and training of staff and associates.
- **Reporting:** CESVI ensures that reporting procedures are clear and that all staff and associates know how to appropriately address and escalate concerns related to sexual exploitation and abuse.
- **Responding:** CESVI guarantees that all necessary actions are taken to support and protect any person in case of alleged, proven, or attempted exploitation or abuse.

By integrating these commitments into every layer of our 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 our operations.

## 6. AWARENESS

- All CESVI employees shall be aware of the Core Principles included 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 and abuse related issues.
- As far as the Policy dissemination is concerned, CESVI commits to provide induction on the Policy to all new staff, with detailed orientation and regular training sessions tailored to different levels of responsibility. These training sessions focus on understanding the risks, preventive measures, and response procedures associated with sexual exploitation and abuse.
- Policy contents are 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 members of the community, especially vulnerable and marginalized groups. Children and communities where CESVI operates are made aware of the PSEA concerns and policy provisions as well.



## 7. PREVENTION

- CESVI applies the highest standards in its recruitment processes to prevent sexual exploitation and abuse. This includes ensuring that all vacancy advertisements mention CESVI's commitment toward preventing SEA and that all candidates are screened for their suitability to work in sensitive environments.
- During the recruitment process, CESVI conducts comprehensive background checks, verifies references to assess past conduct related to abuse or exploitation, and ensures that all new hires undergo an orientation on CESVI's PSEA policies.
- A Code of Conduct that establishes, at a minimum, the obligation all the employees and collaborators not to exploit, abuse or otherwise discriminate against people is in place and duly known to the intended recipients;
- The Ethical Code is published on the internet site and is distributed and duly known to everyone who collaborates in any way with CESVI ETS. The Ethical Code contains the mission, the vision, the declaration of values and principles, the set of rights, duties and responsibilities that it holds with whoever collaborates with CESVI or benefits from its projects or programs;
- CESVI ensures that a Safeguarding Focal Point at HQ level is appointed. The Focal Point assists HQ and Countries' teams in the Policy implementation. Duties, skills and responsibilities of the Focal Point are detailed in Appendix 1; at country level, one staff member is appointed as Country Safeguarding Focal Point (CSFP), after consulting with the HQ FP. ToR of the CSFP are described in the Appendix 2;
- CESVI is responsible to engage local communities to prevent and respond to sexual exploitation and abuse. Local communities shall be involved in developing and approving the Complaints and Feedback Mechanism (CFM) so that the structure is both culturally and gender-sensitive;
- CESVI is responsible to ensure that all the thirdly party, included partners and suppliers are committed to respect the principles included in the PSEA Policy, in addition to those explained in CESVI Ethical Code. Partner organizations working with CESVI must have their own written PSEA policy, or abide by CESVI's one throughout the duration of the partnership. The adoption of CESVI safeguarding standards is ensured by signing the MoU that makes explicit reference to CESVI PSEA Policy.
- In case of Consortia, when Cesvi is the Consortium Leader, Cesvi PSEA 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 PSAE Policy provisions by the partners could lead to the end of the partnership.
- As far as suppliers and contractors are concerned, the acceptance of the PSEA Policy is a condition to undertake any contractual relation with Cesvi. This is done by making explicit reference to the Policy in the contracts concluded with suppliers and contractors.

## 8. REPORTING

- Policy addressees have the duty to report any violation of Cesvi PSEA Policy or any situation in which beneficiaries may be or are at risk of abuse and actions that they become aware of during their job activities and/or during the execution of their duties and/or during their relationships with Cesvi.
- CESVI has established clear, accessible, and confidential mechanisms for reporting sexual exploitation and abuse. These include designated email addresses, confidential hotlines, and direct contact with trained personnel who manage reports.
- A Complaints and Feedback Mechanism (CFM) for reporting sexual exploitation and abuse is in place and accessible. CFM should not be a separate, parallel system to other complaints and feedback structures in a given area, but rather link to and build on existing structures to create one system for handling feedback and complaint;
- The process is communicated widely across all levels of CESVI's operations to ensure that everyone, including beneficiaries and community members, 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. RESPONDING

- CESVI ensures to set protocols to process complaints of sexual exploitation and abuse 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 ended;
- Upon receiving a report of sexual exploitation and abuse, CESVI promptly activates the Case Management Team, 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 in the event that the team assesses that the report is of a serious nature or impact to the individuals involved or to the organization, the team will constitute itself into Crisis Management Unit. See appendix 3 for the composition of the CMT and CMU.
- If the CMT or the CMU considers that there has been a potential violation of the law, CESVI, in accordance with national and foreign legislation, ensures that the competent authority is informed. In this case the survivor must be involved in the decision, so that he/she can make an informed decision on how to proceed with the complaint.

- CESVI guarantees 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 safety and empower them;
- CESVI ensures the protection of the survivor, the complainant and the whistleblower of SEA. CESVI undertakes to provide assistance, psychosocial counselling, medical treatment, legal assistance to any victims of sexual exploitation and abuse;
- The individual alleged to have violated this Policy should have the opportunity to present his or her view of the events in question. 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 person who committed sexual exploitation and abuse, in accordance with the national law reporting and responding system;
- Should, at the end of the preliminary inquiry, the report be shown to have been self-serving or intentionally false, the disciplinary steps indicated in the Human Resources Policy will be taken against the person who presented the report, and a crime complaint will be made to appropriate authorities, in case of crime.

# 10. PROCEDURES FOR MANAGING SEA RELATED ALLEGATIONS

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

**A REPORT IS RECEIVED**

1. IMMEDIATELY WRITE TO [SAFEGUARDING@CESVI.ORG](mailto:SAFEGUARDING@CESVI.ORG) TO INFORM SFP AND CHFP
2. COMPLETION OF THE REPORT FORM
3. SFP AND CHFP assess that an alleged violation of the policy exists

**CASE MANAGEMENT TEAM ACTIVATION\***

\* in the case of reports of particular seriousness or suspicion of crime, the CMT may, at any time during the process, constitute itself into a Crisis Management Unit

THE INFORMATION IN THE REPORT IS NOT CLEAR OR COMPLETE

THE INFORMATION IN THE REPORT IS CLEAR AND COMPLETE

FACT-CHECKING FOR COLLECTION OF INFORMATION ESSENTIAL TO TAKING CHARGE OF THE CASE

INVESTIGATION TO FURTHER INVESTIGATE THE CASE OF SUSPECTED ABUSE, DOCUMENTATION COLLECTION AND FACT-FINDING

INTERNAL CASE INVOLVING CESVI STAFF, ASSOCIATED STAFF, OR PARTNERS

EXTERNAL CASE THAT DOES NOT INVOLVE CESVI AND/OR PARTNERS AND/OR ASSOCIATES

CESVI STAFF AND ASSOCIATED STAFF

PARTNER

TRANSFER OF THE CASE TO THE APPROPRIATE BODIES

POLICY VIOLATION

PARTICULAR SERIOUSNESS OR SUSPICION OF CRIME

THE PARTNER DOES NOT HAVE A PROCEDURE FOR DEALING WITH VIOLATIONS IN THE AREA OF SEA, OR THE PROCEDURE CANNOT BE APPLIED

THE PARTNER HAS A PROCEDURE, AND THAT PROCEDURE CAN BE APPLIED

APPLICATION OF DISCIPLINARY SANCTIONS UNDER THE HUMAN RESOURCES POLICY

CRISIS MANAGEMENT UNIT ACTIVATION

BACK UP SUPPORT IS OFFERED TO THE PARTNER DURING THE PROCESS

APPLICATION OF SANCTIONS PROVIDED FOR IN THE CONTRACTUAL AGREEMENT UP TO TERMINATION OF THE CONTRACT ITSELF

OFFENCE REPORTED TO RESPONSIBLE AUTHORITIES

**CASE CLOSURE**  
(DOCUMENTATION IS COMPLETED AND STORED SECURELY, INFORMATION IS SHARED WITH THOSE IN A RELEVANT POSITION)



## APPENDIXES

### Appendix 1 - Role and responsibilities of Safeguarding Focal Point

*The Safeguarding Focal Point is a designated person who is responsible of making sure that the Child Safeguarding Policy is implemented and followed. This role should reflect the nature and structure of the organisation and the person should have enough support to carry out the role.*

*At each appropriate level or setting there should be an appointed person/s who everybody can talk to about safeguarding matters. Everyone should know how to contact this person(s). Other people in the organisation can then go to them if they have concerns about child safeguarding or abuse. The designated Safeguarding Focal Point is responsible of hearing any abuse concerns in an organisation, and then dealing with those concerns.*

#### **THE ROLE OF THE SAFEGUARDING FOCAL POINT IS TO:**

- take a lead role in raising awareness about the organization's child safeguarding measures including the Code of Conduct and if necessary provide training and advice to staff and volunteers on these measures;
- work with managers/staff to ensure that programmes and operations are integrating CS measures in all activities;
- promote the participation of the beneficiaries of the project so they are aware of the organisation's CS measures and Code of Conduct and of their right to protection. They also have to be aware of how they would raise a concern about child safeguarding;
- act as a focal point to receive information about the child safeguarding concerns;
- work with programme managers to establish community-level complaints mechanisms that facilitate reporting of concerns made by beneficiaries;
- ensure that all information is recorded on the child safeguarding incident form and referred to the Case Management Team (HQ);
- plan and participate in any investigation regarding an incident;
- maintain the child safeguarding incident tracker;
- provide overall support to a wider implementation of policies and procedures in order to safeguard children;
- assess child safeguarding risks within the organisation, including in its programs and projects;
- consult with local agencies whenever necessary and gather up-to-date information about service provision;
- ensure that referral pathways for child safeguarding responses are updated;
- in consultation with the Crisis Management Unit, make a formal referral to a statutory agency (e.g. police) or other organisation, if appropriate.

#### **SKILLS**

- Have knowledge and experience about child protection;
- Capacity to maintains confidentiality in information management and communication, as appropriate;
- Good communication and relationship skills;
- Skilled in analysing capacity building needs and designing and delivering a range of capacity building interventions;
- Oral and written communication ability to suit target audience and deliver messages effectively.

## Appendix 2 - Term of Reference Country Safeguarding Focal Point

Country Safeguarding Focal Point (CSFP) is a designated person who provide overall support to a wider implementation of CESVI Safeguarding policies and procedures at country level.

The designated CSFP is responsible of hearing any information or notice of abuse concerns at country level and then dealing with those concerns, him/her collaborate with the HQ Safeguarding Point as to facilitate the analysis and handling of reports of suspected abuse and/or violation of safeguarding policies.

The role of the CSFP is to:

- Take a lead role in raising awareness about the organization's safeguarding measures including the Code of Conduct at country level including:
  - o Organize translation of the CS Policy into local language, distribute to all staff and partners;
  - o Ensure public display of the CS Policy, Code of Conduct, and Reporting Process Flow Chart in the Country Office;
  - o When necessary provide training and advice to staff and volunteers and partners on their roles and responsibilities in preventing risk and reporting child safeguarding concerns;
- Ensure that safeguarding complaints handling mechanism is available and updated;
- If it is needed, support the process of safeguarding risks assessment during the project/program proposal designing phase
- Work with managers/staff to ensure that programmes and operations are integrating safeguarding measures in all activities;
- Locally receive any report of suspected, abuse, maltreatment and sexual exploitations;
- Collaborate with HQSFP and Case Management Unit when needed;
- Maintain the safeguarding incident tracker at country level;
- Ensure that referral pathways for safeguarding responses are updated;

SFP is formally responsible for the realization of the above-mentioned activities/actions. The Head of Mission has ultimate responsibility for ensuring.

## Appendix 3 - Composition of the CMT and CMU

The CASE MANAGEMENT TEAM (CMT) is composed by:

- 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 are involved. In case a suspected abuse involves a partner organization, also the member of the partner could be contacted to participate in the investigation.

Within the framework of the procedure 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 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. Based on this investigation it will decide whether the suspicion is dispelled, whether a violation of the Policy has been found or whether the suspicion of a criminal offence is founded or not. Further measures are taken according to these steps.

If the allegation is made overseas the CM Team will conduct the investigation in direct collaboration with CESVI local staff and according the national legislation and procedures. In any case the CM Team will maintain the leadership of the investigation.

If the investigation confirms a violation of the Code of Conduct, the CM Team 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 by:

- CMT members
- General Manager
- Head of International/National Programme Department
- Head of Fundraising & Communication Department

When necessary, other internal figures and/or other external professionals are involved.

The CMT is constituted into the CMU when the case may anticipate criminal relevance or presents a serious character, by nature or impact, for the persons involved or the organization.

In addition to the functions of the CMT, the CM Unit has four main tasks:

- it will be responsible to contact, in agreement with the Board of Directors, the police and/or other authorities in order to report the incident;
- Verify obligations to relevant entities-such as donors, networks, statutory bodies-in terms of making them aware of the facts;
- activate the Crisis Communication Strategy of the organization;
- report to the Board of Directors.

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

## REFERENCES

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