



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

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# 1. INTRODUCTION

WeWorld-GVC is a foundation that has been established in December 2018 following the merger of WeWorld Onlus (established in Milan in 1999), and the GVC Association (established in Bologna in 1971). The foundation works across 29 countries including Italy to ensure that the fundamental rights of every human being, especially children and women, are recognized and respected, tackling poverty, violence and injustice, whilst generating opportunities and sustainable development.

WeWorld-GVC strives for a better world where everyone, including children, have equal opportunities and rights, access to resources, healthcare, education, and fair employment. A world where a positive and inclusive environment is fostered; *where war, violence and exploitation are banned*. A world where nobody is left behind.

The primary groups for WeWorld-GVC operations are children, young persons and women, namely 'actors of change' in every community for a fairer and more inclusive world. Through development programmes WeWorld-GVC helps people overcome emergencies so that they can rebuild and lead a dignified life and look ahead to a future that offers opportunities (within the context of Agenda 2030).

This policy is complementary to the set of standards of behaviour that all WeWorld-GVC personnel are already required to adhere: the Code of Ethics and Conduct, Antifraud and Anticorruption Policy, and the 231 Procedures also referred as the Model.

## PURPOSE AND AIM OF THE POLICY

WeWorld-GVC strongly believes that everyone has the right to live their lives without fear from sexual abuse, exploitation and harassment (SEAH). This Policy has been developed to ensure that right-holders, community members, employees and representatives alike are protected from any form of SEAH.

The purpose of the Policy is to steer the organisation, its employees and representatives to create and promote safe working environments by preventing SEAH.

## SCOPE OF THE POLICY

WeWorld-GVC is committed to fostering the well-being of every human being. The scope of the Policy is to detail core principles, behavioural standards, preventative measures and procedures in building a safe working environment in every aspect of the organisation's operations and beyond.

This Policy applies to:

- All WeWorld-GVC staff, volunteers, consultants and representatives worldwide
- Partners, suppliers, contractors, subgrantees or those who otherwise have a contractual relationship with WeWorld-GVC unless it has been agreed that the partner will apply its own PSEAH Policy.
- Journalists, photographers and any other visitors in any capacity.

## 2. POLICY STATEMENT

Promoting and maintaining a safe environment for all, is one of the founding pillars on which the work of WeWorld-GVC is built on. In line with this fundamental principle, WeWorld-GVC does not tolerate and strictly prohibits any form of SEAH, as well as any non-sexual abuse, exploitation or harassment against anybody.

WeWorld-GVC upholds protection from SEAH throughout its programmes ensuring that staff, partners, consultants, suppliers, contractors, volunteers, interns and board members (hereinafter “the recipients” of this Policy) adhere to the PSEAH Policy at all times. The core principles, along the preventative measures detailed in this Policy, are aimed at creating and strengthening a safe working culture where nobody is subjected to SEAH or any other form of physical or mental abuse, exploitation or harassment.

WeWorld-GVC works in partnership with parents, caregivers, communities, stakeholders and other professionals to mainstream protection from SEAH.

WeWorld-GVC is committed to upholding the Six Core Principles Relating to Sexual Exploitation and Abuse of the Inter-Agency Standing Committee (IASC).<sup>1</sup>

1. “Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
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 defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.

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<sup>1</sup> <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.”

Additionally, all WeWorld-GVC works in accordance with IASC's Rules on Sexual Conduct for Humanitarian Workers. Humanitarian workers can be disciplined – even fired – for unacceptable behaviour in relation to sex. These are the rules they must comply with:<sup>2</sup>

- Humanitarian workers are not allowed to have sexual relationships with anyone under the age of 18, even if it is legal in their country. Saying they did not know the person's true age is not a valid excuse.
- Humanitarian workers are not allowed to pay for sex with money, employment, goods or services – including goods and services intended as aid to people in need. They must not use promises of these things to make other people accept any kind of behaviour that humiliates or exploits them. This includes paying or offering money for sex with a sex worker.
- Humanitarian workers have influence over who receives goods and services. This places them in a position of power in relation to people who need assistance. For that reason, humanitarian organizations strongly encourage staff not to have sexual relationships with anyone affected by a humanitarian emergency. Such relationships make humanitarian action seem less honest and credible.
- If a humanitarian worker is worried or suspects that anyone in their organization or another aid organization may be breaking humanitarian rules on sexual conduct, they must report it, following procedures set up by their agency.
- Humanitarian workers must create and maintain a work environment, which prevents unacceptable sexual behaviour and encourages staff to behave as set out in their codes of conduct. All managers are responsible for supporting and developing systems, which maintain this environment.

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<sup>2</sup> [https://interagencystandingcommittee.org/system/files/rules\\_on\\_sexual\\_conduct\\_for\\_humanitarian\\_workers\\_-\\_plain-language\\_english\\_0\\_0.pdf](https://interagencystandingcommittee.org/system/files/rules_on_sexual_conduct_for_humanitarian_workers_-_plain-language_english_0_0.pdf)

### 3. DEFINITIONS AND ABBREVIATIONS

#### ABUSE

Abuse is when a person is being harmed by another person or group whether physically, sexually or emotionally, whether intentionally or through neglect.

#### CHILD

In accordance with Article 1 of the United Nations Convention on the Rights of a Child the definition of a child is “Every human being below the age of 18 years”.

#### SGBV

Sexual and gender-based violence (SGBV) refers to any act that is perpetrated against a person’s will and is based on gender norms and unequal power relationships. It encompasses threats of violence and coercion. It can be physical, emotional, psychological, or sexual in nature, and can take the form of a denial of resources or access to services. It inflicts harm on women, girls, men and boys.<sup>3</sup>

#### SEAH

To describe the meanings of SEAH the UN definitions are used:<sup>4</sup>

- **SEXUAL EXPLOITATION:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationship.
- **SEXUAL ABUSE:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It should cover sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse.
- **SEXUAL HARASSMENT:** A continuum of unacceptable and 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 or humiliating.

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<sup>3</sup> <https://www.unhcr.org/sexual-and-gender-based-violence.html>

<sup>4</sup> <https://www.gov.uk/guidance/safeguarding-against-sexual-exploitation-and-abuse-and-sexual-harassment-seah-in-the-aid-sector>

### **SURVIVOR/VICTIM**

The term survivor refers to a person who has been a victim of SEAH. The term victim is more often encountered in legal and medical contexts. WeWorld-GVC is driven by a survivor-centred approach, hence the usage of the term 'survivor' is highly encouraged.

### **VULNERABLE ADULTS**

Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or who, based on their gender, mental or physical health, age, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

Additional definitions can be found in Annex II.

## **4. CORE PRINCIPLES**

### **ZERO TOLERANCE ON SEAH**

WeWorld-GVC does not tolerate any form of SEAH, and will not knowingly engage anyone to any capacity who might pose a direct risk to children, and vulnerable adults.

### **NON-DISCRIMINATORY**

WeWorld-GVC respects and treats people with dignity regardless of their nationality, culture, ethnicity, gender, religious or political belief, socio-economic status, family or criminal background, or physical or mental health.

### **'DO NO HARM'**

WeWorld-GVC is committed to mainstreaming the 'Do No Harm' principle in its operations. The "Do No Harm" principle requires humanitarian organisations to strive to minimize the harm they may inadvertently cause through providing aid, as well harm that may be caused by not providing aid (such as adding to tensions with host communities). Across the globe WeWorld-GVC aims to create synergies with communities, partners and authorities alike to better understand the local context, and the impacts of its interactions in order to minimise the risks of causing harm.



### SAFE PROGRAMMING

It is of utmost importance that all activities are carefully designed and implemented by taking into consideration potential risks and threats and by minimising these as much as possible. WeWorld-GVC takes proactive measures at every stage of project implementation to avoid causing harm inadvertently whilst mainstreaming best practices.

### ACCOUNTABILITY AND TRANSPARENCY

WeWorld-GVC ensures that the PSEAH Policy is implemented and adhered to, its implementation is monitored, and reviewed on a regular basis considering feedbacks received.

When a suspected case of abuse is reported action will be taken promptly by following reporting procedures, recording all information. Every report is taken seriously.

### SHARING RESPONSIBILITY

When implementing development and humanitarian projects in collaboration with institutions or partner organizations that do not have a Policy on PSEAH, WeWorld-GVC will ensure that they agree to adopt WeWorld-GVC PSEAH Policy for the duration of the project.

### DATA PROTECTION AND CONFIDENTIALITY

All WeWorld-GVC personnel are required to maintain confidentiality and to comply with data handling processes, such as collecting, storing, transmitting and destroying data. Information can only be shared on a need-to-know basis<sup>5</sup>.

It should be noted however, that sharing of information might be necessary if it is in the best interest of the individual or if it is required by statutory bodies.

### CAPACITY BUILDING

WeWorld-GVC supports capacity-building of families and communities, teachers, health and social workers, medical personnel and others in proximity of children, and vulnerable adults in prevention and protection efforts, including early recognition of abuse and appropriate responses.

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<sup>5</sup> According to the WW-GVC Foundation Data protocol based on the GDPR EU 2016/679.

## 5. STANDARDS OF BEHAVIOUR OF STAFF

In addition to the Code of Ethics and Conduct, the following standards of acceptable and unacceptable behaviours must be taken into consideration by all staff and representatives at all times:

### DO's

- respect and promote human rights, treat everyone with respect and dignity and without discrimination of any type
- behave ethically, use appropriate language especially in front of children, and respect people's privacy and dignity
- undertake any trainings that is required in relation to PSEAH, actively raise awareness and promote the implementation of this Policy, and uphold the core principles of it
- maintain professional relationships with both right-holders and fellow colleagues at all times
- create and contribute to fostering a safe environment where people feel able to raise their concerns, anything they have witnessed or experienced
- report any concerns, wrongdoing or breach of this Policy by following procedures detailed in this document. Keep in mind that individuals are not obliged to report their own experiences.
- seek advice if you have concerns or in doubt

### DON'T's

- develop sexual relations, have sex or engage in any sexual activities with minors under the age of 18 regardless of whether she/he gives consent. Mistaken belief of age is not a defence.
- develop sexual relations, have sex or engage in any sexual activities with rights-holders. Developing such relations is strictly prohibited due to its inherent conflict of power dynamics.
- exchange money, goods, employment or services in return for sex or any sexual activities.
- take part in any sexually exploitative or abusive activities
- bully, harass, sexually harass or discriminate anyone
- take advantage of power dynamics for sexual gains or any other reasons
- give preferential treatment to anyone, for example by paying more than desirable attention or by giving excessive gifts

The above lists are not exhaustive. Staff and representatives should consider all behaviours and actions, which may negatively affect others, and violate Human Rights.

Additionally, in line with the organisation's commitment to protecting people, all employees and representatives are required to adhere to this Policy even outside work. Therefore, actions that contradict the core principles outlined hereby will be considered a violation of this Policy.

Finally, remember that no matter how well intended your actions are someone may misinterpret them.

## 6. PREVENTION

WeWorld-GVC is committed to creating and maintaining an environment where human rights are respected and promoted.

### AWARENESS RAISING

It is essential that all WeWorld-GVC staff, volunteers, as well as contractors, representatives, and communities are made aware of the PSEAH Policy and know how to raise their concerns of suspected abuse. All new staff are introduced to the PSEAH Policy upon entering into contract with WeWorld-GVC. Considerations should be applied when raising awareness in different cultural contexts and especially among children and vulnerable adults.

### TRAINING

All staff must read, acknowledge this policy. WW-GVC Foundation commits itself to conduct periodical trainings in relation to this Policy to adequately inform the staff, raise their awareness and enhance their capacity in preventing, and dealing with possible SEHA cases in the most appropriate way, as described in this document.

In addition, country offices must organise refresher trainings/workshops on safeguarding children, and on protection from sexual exploitation, abuse and harassment.

### RISK ASSESSMENT

Risks assessments are conducted in order to identify risks throughout the organisation's operations. WeWorld-GVC endeavours to reduce these risks to a bare minimum and is committed to mainstreaming best practices. Before launching and throughout its cycle, projects are evaluated and monitored to ensure that all activities are in line with the core principles of the PSEAH Policy. Practices and policies of stakeholders are examined prior to

forming a partnership to ensure that they are committed to child safeguarding and to the prevention of SEAH.

### VISITORS

Visitors to WeWorld-GVC programmes are expected to uphold the standards of the PSEAH Policy, as well as the Child Safeguarding Policy, and the Code of Ethics and Conduct of WeWorld-GVC at all times. All visitors are required to be familiar with and have a sound understanding of the policies and the Code of Ethics and Conduct in advance of their visit.

### FOCAL POINT

Every country office, as well as the Headquarters, has an appointed Safeguarding Focal Point.

Safeguarding focal point is an appointed person within the staff team who has the professional competences to ensure the application and respect of this policy at Country Level, its supervision and who can properly deal with, handle and has the capability to analyse in the proper way safeguarding concerns by also addressing them to the Supervisory Body.

Consequently, concerns should be shared directly through the Safeguarding Focal Point or can be raised with line managers if it is not possible to the Safeguarding Focal Point however, ultimately it is the responsibility of the latter to complete and forward the Incident Reporting Form to the Supervisory Body once a concern has been raised.

### SAFE RECRUITMENT

WeWorld-GVC takes great responsibility and all necessary steps to ensure that potential new employees are screened in order to identify any concerns or risks that the individual might pose to children, and vulnerable adults or otherwise. The following measures are in place to comply with safe recruitment standards:

- **Interview:** Questions should be designed to help identify any protection concerns.
- **Reference checks:** Candidates are required to supply the names and contact details of referees from previous employers whom can be contacted regarding the suitability of the candidate to work with children, and vulnerable adults.
- **Declaration Form:** All new employees are required to sign the Declaration Form, Annex I whereby they confirm that there are no concerns regarding their suitability to be around and work with children, and vulnerable adults and that they have provided the details of any previous issues in connection with protection concerns.
- **Police Vetting:** Depending on the sensitivity of the role, candidates may be required to submit criminal record checks.

### INFORMED CONSENT

No pictures, videos or any other forms of audio-visual material portraying rights-holders can be taken without having previously obtained their informed consent. If the right-holder is a minor, the child's parent/s or legal guardian/s must give consent. Informed assent should be sought from the child herself/him.

Consent and assent must be informed, voluntary and unambiguous.

- **Voluntary:** right-holders must be given the genuine freedom of choice to give or refuse their consent, without providing any further explanation and without any detrimental consequences in the treatment given to them by staff or otherwise negatively affecting their access to assistance.
- **Unambiguous:** right-holders must express their consent in an explicit, univocal and affirmative manner. Consent must not be in any ways implied.
- **Informed:** right-holders must be informed about the purposes and the usage of the images and/or video captured. This information must be provided in a language they are able to easily understand, in age-appropriate, clear, and jargon-free terminology.

### SOCIAL MEDIA

WeWorld-GVC ensures that its social media platforms are used safely, and that no sensitive information is shared about right-holders that could reveal their identity and compromise their safety whenever posting images and/or stories from the field.

Additionally, all WeWorld-GVC staff must exercise precaution and be mindful when posting information regarding their work on private social media accounts. Staff and representatives are not allowed to interact with right-holders on any social media platform.

### VISUAL IMAGES AND WRITTEN CONTENT

Consent must be sought the rights-holders before they are photographed, filmed and/or interviewed. If the right-holder is a minor consent must be given by the child's parent/s or caregiver/s before the child is photographed, filmed and/or interviewed. Assent from the child herself/himself should be also sought in advance. The consent should provide information on how the material will be used, for what purposes, how and where the information is stored and for how long.

Right-holders must be portrayed at all times in a dignified and respectful manner and never in a submissive and vulnerable way. Children should be adequately dressed. Whenever working with children there must be at least two adults present.

WeWorld-GVC will not share images, videos and interviews/stories of right-holders that could reveal identifiable information. For example, only first names can be used, if necessary real names will not be used at all. Derogations will apply in the case of Child Sponsorship Programmes, for which a special protocol in terms of images and personal information regarding children is applied<sup>6</sup>.

## 7. REPORTING AND RESPONDING

### DUTY TO REPORT

All WeWorld-GVC personnel, including volunteers have a duty to report any concerns, allegations or suspected incidents of SEAH. Reporting can be done by various methods described in the reporting procedures.

It rests upon the choice of the complainant whether or not she/he wishes to make a report about something they experienced themselves.

Any reported allegations of PSEAH by WeWorld-GVC personnel will be investigated and appropriate actions will be taken. WeWorld-GVC will support the complainant and maintain confidentiality.

### REPORTING

The following steps should be taken into consideration when reporting concerns and suspected cases of SEAH.

- ➔ **WHO?** Anyone who has concerns over the well-being of a child, or a vulnerable adult, or have experienced themselves SEAH, can raise their concerns. However, consent should be sought from the affected person/s prior to reporting.
- ➔ **WHAT?** Cases of suspected SEAH, whereby the alleged perpetrator is a member of staff, Or staff of partners, etc.
- ➔ **WHEN?** Reporting should take place with no delays, as soon as possible and feasible.
- ➔ **TO WHOM?**
  - Any concerns should be reported to the Safeguarding Focal Point who will necessarily report it to the Supervisory Body, or It can be raised to the line manager if for any reason its not possible to do so to the Safeguarding Focal Point, however, ultimately it is the responsibility of the latter to complete and forward the Incident Reporting Form to the Supervisory Body once a concern has been raised.
  - Any concerns can also be reported directly to the Supervisory Body, as an independent and external body with the function of supervising the respect of this policy and the compliance

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<sup>6</sup> Ref.WW-GVC LDS Handbook Long Distance Sponsorship procedural visibility package

with the 231 Model, its presence ensures amongst the other things the protection of the complainant from possible retaliations. either via email [odvweworldgvc@gmail.com](mailto:odvweworldgvc@gmail.com); or alternatively sent to the professional address of the Supervisory Body: Avv. Giovanni Catellani, Via Guido da Castello 33, 42121 Reggio Emilia.

The consultation is reserved only to the members of the Supervisory Body.

To be noted that the presence of the Safeguarding Focal Point, due to his/her professional competences, represents a further guarantee on the operation and application of the current policy at Country level, it does not compromise in any case the application of the whistleblowing policy and the possibility for anyone to refer directly to the Supervisory Body if necessary.

➔ **HOW?** Reports can be made verbally, in person, via e-mail to the Safeguarding Focal Point (or to the Supervisory Body according to the modalities indicated above). Whichever form is used confidentiality and discretion should be exercised at all times (for example, if reporting via telephone ensure that no one can hear what is being said).

Once the concern has been reported, the Safeguarding Focal Point will complete the written Incident Reporting Form, please see Annex IV.

The completed form is then necessarily sent to the Supervisory Body: either via email [odvweworldgvc@gmail.com](mailto:odvweworldgvc@gmail.com); or alternatively sent to the professional address of the Supervisory Body: Avv. Giovanni Catellani, Via Guido da Castello 33, 42121 Reggio Emilia. The consultation is reserved only to the members of the Supervisory Body.

The Supervisory Body has the overall responsibility for the implementation and monitoring of the PSEAH Policy, the “Organization, Management and Control Procedures and 231 Model” and the Code of Ethics in accordance with Italian Legislative Decree 231. Therefore, it rests upon the Supervisory Body to assess the allegations, to appoint the person/s to investigate the allegations, and to inform the President of WeWorld-GVC and the Board of Directors whom together will carry out formal disciplinary procedures provided the allegations are substantiated.

Investigation must be initiated as soon as the Reporting Form is submitted by the Safeguarding Focal Point. or by the complainant him/herself to the Supervisory Body.

It should be noted that all concerns are considered allegations until evidence proves otherwise, therefore confidentiality must be maintained by all parties involved in the reporting throughout the procedures and beyond.

The flowchart of the Reporting and Responding Procedures can be found in the Annexes.

### PROTECTION FROM RETALIATION

WeWorld-GVC does not tolerate any negative behaviour or action towards anyone who raises concerns of SEAH, whether they are the survivors, witnesses or whistle-blowers. Any threatening

or intimidating action, whether verbal or physical, will be subjected to investigation, which may result in disciplinary action or even in the dismissal of the staff member carrying out reprisals.

### KEEPING INFORMED THE SURVIVOR

In addition to offering full support and assistance to the survivor, they will be provided information on the progress of the investigation regularly, and will be informed on the details of the outcome.

### HISTORICAL ALLEGATIONS OF ABUSE

Whether an abuse has happened recently or in the past, it has to be emphasised that there are no time constraints for reporting these historical cases.

### BARRIERS TO REPORTING ABUSE

Some people may have concerns about sharing suspected cases of SEAH for various reasons. For example they may fear that they were wrong, that reporting the case might worsen the situation for the complainant, or they might be put off reporting suspicions over fears about repercussions on for them personally. However, WeWorld-GVC takes each and every allegation seriously, and strongly encourage for people to speak up as soon as they became aware of suspected cases of SEAH.

### UNFOUNDED ALLEGATIONS

If a concern is raised in good faith and it is not confirmed by investigation, no action will be taken against the reporting individual.

If, however, an allegation is deliberately false, misleading and malicious, appropriate or legal action will be taken against the reporting individual.

## 8. PROTECTION OF VICTIMS/SURVIVORS

WeWorld-GVC facilitates survivors of sexual exploitation and/or abuse access to psychosocial, medical and legal support either by providing them with direct services or referring them to relevant service providers present at Country level, including UN agencies. WeWorld-GVC ensures the survivor will be supported throughout legal proceedings by providing information of her/his own rights in respect to local legislation, customary law and international conventions. If the survivor works for the organization she/he shall be offered the option of transferring to another office or the possibility of suspending her/his work whilst receiving their salary.

This should be done respecting the wishes and needs of the survivor whilst also taking account of confidentiality and cultural sensitivities. Ensuring survivor safety should be the paramount principle to be actively upheld throughout the whole process.



## 9. RESPONSIBILITIES

Across the organisation, every personnel, regardless their position and the type of their association with WeWorld-GVC are required to adhere to this policy at all times, including outside working hours and during the periods of leave. Additionally, all staff must sign the Declaration Form, Annex I, upon entering into contract.

### MANAGERS

Managers at all levels are responsible to promote awareness and understanding of the Policy among all personnel (including volunteers) and that all personnel have the knowledge and skills to support the mainstreaming of the Policy. Additionally, managers are required to mainstream good practices and to create an environment where individual can raise their concerns without fear of reprisal.

### STAFF AND VOLUNTEERS

It is every staff and volunteers' due responsibility to understand, advocate and apply the Policy to their work. If allegations or incidents of abuse are raised it is important for staff and volunteers to follow correct procedures of reporting.

## 10. IMPLEMENTATION, MONITORING AND REVIEW OF THIS POLICY

Everyone at WeWorld-GVC, regardless of their status has the responsibility in the implementation of the PSEAH Policy, based on the principles outlined in this document.

The implementation of safeguarding standards, and compliance with this Policy is monitored on an ongoing basis. Feedback from staff, as well as communities and stakeholders is highly encouraged in order to improve procedures. WeWorld-GVC Foundation also provides an internal channel, within the Quality & Control Unit, for reporting the improvements of this policy in the following email: [compliance.officer@weworld.it](mailto:compliance.officer@weworld.it). The Quality & Control Unit has the duty to always inform the Supervisory Body.

This Policy is subject to review on a regular basis, at least once every five years by the Board.

## ANNEX I - DECLARATION FORM

I, \_\_\_\_\_  
hereby declare that

- I have fully read and understood the Protection from Sexual Exploitation, Abuse and Harassment Policy
- I will responsibly adhere to the Policy
- I have disclosed to WeWorld-GVC any information that may cause concern for protection in connection with my suitability for employment, volunteering or consultancy
- I will inform WeWorld-GVC if any changes in my circumstances could be grounds for protection concern, and seek advice from relevant Safeguarding Focal Points
- I am aware that any false declaration, withholding information is considered gross misconduct

Signature  
\_\_\_\_\_

Date  
\_\_\_\_\_

Declaration received by *(print and sign)*  
\_\_\_\_\_

Date \_\_\_\_\_

## **ANNEX II-ADDITIONAL DEFINITIONS**

### **BULLYING**

Bullying means the deliberate ill-treatment of a person by displaying dominating, aggressive and/or demeaning behaviour towards another person, such as name-calling, threatening, harassment, causing physical harm, spreading rumours, and making rude gestures. In most cases bullying occurs repeatedly over a period of time. Bullying can happen anywhere in many forms, including online.

### **FALSE IMPRISONMENT**

A child or vulnerable adult may be falsely imprisoned by an individual in a confined space that restricts movements with the intention of causing physical injuries and/or emotional distress. In addition, false imprisonment can also result in deliberately neglecting the child or vulnerable adult by failing to meet their basic needs whilst imprisoned.

### **GROOMING**

Grooming, including online grooming happens when an individual befriends a child or a vulnerable adult for the purposes of sexual exploitation, sexual abuse or trafficking.

### **HARMFUL TRADITIONAL PRACTICES**

Although culturally may be accepted, several traditional practices are considered harmful, both physically and mentally. Such practices include female genital mutilation or cutting, witchcraft, and early forced marriage.

### **NEGLECT**

Neglect is the ongoing, persistent failure or deliberate denial to meet a child's or a vulnerable adult's basic needs, including water, aliment, clothing, shelter, education, emotional support, medical care and protection. It should be noted that neglect can be unintentional, for example when a parent or carer does not have the means to provide for the child or vulnerable adult adequately due to poverty.

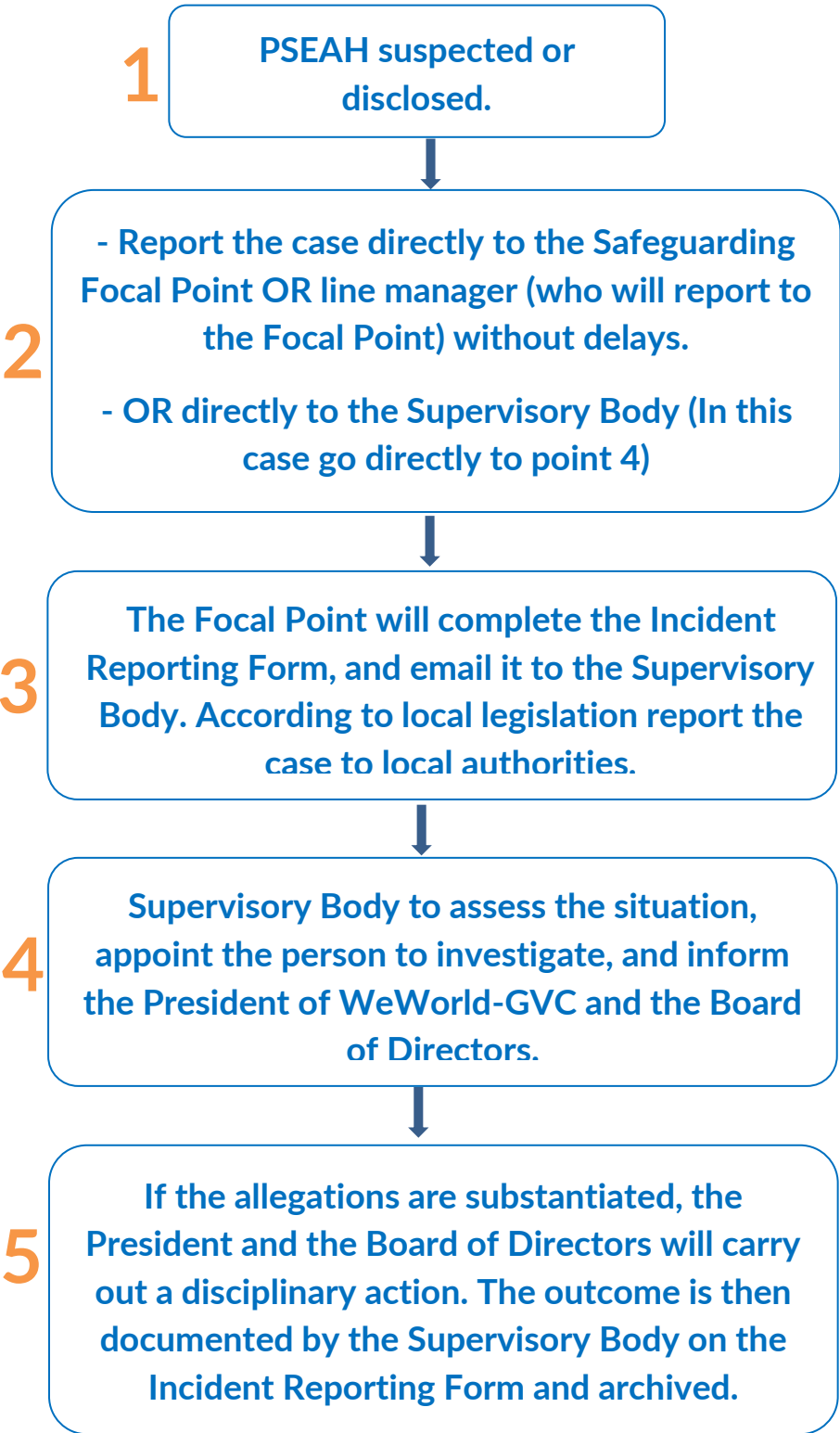
### **TRAFFICKING**

Trafficking of children or adults refers to the illegal recruitment, transportation of children - either by force or by tricking them into it - for the purpose of forcing them into slavery, prostitution, forced labour, involuntary domestic labour, debt bondage, serving as soldiers or any other form of exploitation.

### **TRANSACTIONAL SEX**

This term refers to the exchange of monetary reward, gifts and other goods, employment in exchange of services of sexual nature.

### ANNEX III- FLOWCHART OF REPORTING AND RESPONDING PROCEDURES



# ANNEX IV - INCIDENT REPORTING FORM

## CONFIDENTIAL

Any concerns, suspected cases of SEAH must be recorded using this form (for internal allegations only). The form should be completed with all known information. If there are more than one victims, a separate form should be used for each case. Sections 1-5 must be completed by the Safeguarding Focal Point in the relevant country office, who will then email it to the Supervisory Body. If there is a hard copy, it must be stored securely and safely in a lockable storage (for further information on handling paper documents refer to the Data Protection Protocol).

### SECTION 1. ABOUT THE REPORTING

Date and time of reporting			
Method for reporting ( <i>delete as applicable</i> )	in person letter	telephone	email
If the survivor is above 18, do they consent?	Yes	No	

### SECTION 2. DETAILS OF THE REPORTER *(if not the complainant)*

Does the reporter wish to be identified? (if 'No' proceed to Section 3)	Yes	No
Full Name		
Contact Number		
E-mail		

SECTION 3. DETAILS OF THE COMPLAINANT

Full Name	
Gender	
Date of Birth	
Age (or approximate age if unknown)	
Address	
Disability (if 'Yes' please specify)	Yes No
Any other relevant information	
If the complainant is a minor, are the parents/caregivers aware of the allegations/suspensions	Yes Not known No
Name of parent/s, or caregiver/s	
Contact details of parent/s, or caregiver/s	
Address	

SECTION 4. DETAILS OF THE ALLEGED PERPETRATOR

Full Name	
Gender	
Age	
Occupation	

**SECTION 5. DETAILS OF CONCERN, ALLEGED INCIDENT**

Please describe here what happened, including date, time, location of the incident, any witnesses, persons involved.

Safeguarding Focal Point (*print and sign*) \_\_\_\_\_

Date

Sections 6 and 7 to be completed by the Supervisory Body.

SECTION 6. ACTIONS TAKEN

Has the incident been reported to the relevant authorities in line with local legislation?	Yes	No
If 'Yes' date of reporting		
To which authority has been reported?		
If 'No' why?		
Actions taken by WW-GVC Supervisory Body (insert details)		
Actions taken by WW-GVC PSEAH Team		

SECTION 7. OUTCOME

Is the allegation substantiated?	Yes	No
Are the findings conclusive?	Yes	No

What actions have been agreed?

Any recommendations, lessons learnt?

Supervisory Body (print and sign) \_\_\_\_\_

Date \_\_\_\_\_





Fondazione WeWorld-GVC

Via Serio 6, 20139, Milano | Via Baracca 3, 40133, Bologna

Tel +39 02 55231193 | Tel +39 051 585604

Fax +39 02 56816484 | Fax +39 051 582225

[www.weworld.it](http://www.weworld.it)