



**Save the Children**

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# **PSEAH POLICY**

**POLICY FOR PROTECTION AGAINST  
SEXUAL EXPLOITATION, ABUSE,  
HARASSMENT, INTIMIDATION,  
DISCRIMINATION AND ABUSE  
OF AUTHORITY**

(PSEAH Policy)

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# 01 OUR COMMITMENT TO PROTECTION AGAINST SEXUAL EXPLOITATION, ABUSE, HARASSMENT, INTIMIDATION, DISCRIMINATION AND ABUSE OF AUTHORITY (hereinafter “PSEAH”)

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Sexual Exploitation, Abuse and Harassment (hereinafter “SEAH”) perpetrated by humanitarian organisations against their beneficiaries violates universally recognised international and national legal standards and our main values and are a profound failing in the community which Save the Children is part of.

Save the Children Italia Onlus (hereinafter “Save the Children” or “the Organisation”) is committed to promoting a safe environment through proactive, accessible, effective measures and approaches to the ends of preventing these phenomena or responding in good time should they occur. Save the Children pursues the highest standards in terms of integrity and conduct from its staff, representatives and partners and does not intend to abuse of the trust that its beneficiaries and communities have in our organization.

# 02 OUR COMMITMENT TO ADULT BENEFICIARIES

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The need for this Policy emerged from the acknowledgement that the pursuit of our Mission places us in a position of trust in relation to the communities we work in, and, in particular, those in vulnerable situations. Save the Children staff, representatives and volunteers, and its partners must operate in a respectful manner, without abusing the power gap which their position and influence over the well-being of beneficiaries entail.

Save the Children is also aware that, while sexual exploitation, abuse, harassment and behaviour characterised by intimidation, abuse of power or discrimination can affect all members of society, they have even more serious impact and consequences on social groups that are subject to forms of discrimination or hardship often connected to gender identity and expression, sexual orientation, religion or ethnicity, to a specific disability which they have or to the social class they belong to.

The Organisation recognises that attention to these phenomena is particularly important considering the silence and the difficulty when it comes to detecting them and the fact that they are systematically underestimated due to a series of reasons, including, but not limited to, stigmatisation, risk of further traumas and the difficulty victims have in accessing forms of help. Save the Children, as a rights-based organisation, must have an active role in prevention and effective response. For this reason, Save the Children is committed to supporting victims of these phenomena, regardless of whether they choose to report them through the channels made available by the Organisation or by other legal means.

## 03 REFERENCES

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This Policy sets out the main contents in Save the Children's *SEAH Safeguarding Framework*. This general positioning document outlines our approach regarding the phenomena of sexual exploitation, abuse and harassment. It regards, in particular, the protection of our adult beneficiaries (aged 18+), in the event that potential perpetrators of such behaviour are Save the Children staff, representatives, volunteers and visitors or staff members of Save the Children partner organisations.

It is also connected to the Child Safeguarding Policy, which offers specific measures and procedures to safeguard children, that it does not intend to derogate or replace. This Policy must also be interpreted alongside other Policies in force, in particular, the "Anti-Harassment, Intimidation and Discrimination Policy", the "Whistleblowing Policy" and "Save the Children's Code of Ethics".

## 04 DEFINITIONS AND FIELDS OF APPLICATION OF THE PSEAH POLICY

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This Policy outlines the minimum standards which are applied and followed in every aspect and area of Save the Children's work: fundraising, awareness raising, campaigns, communications and marketing, development of programmatic, humanitarian and emergency interventions.

Every report of acts, suspicions or concerns regarding sexual exploitation, abuse, harassment, intimidation, discrimination and abuse of authority which come under this Policy will be managed according to the General Procedure included herein (hereinafter "PSEAH General Procedure"), in line with the disciplinary procedures of Save the Children Italy and current legislation.

This Policy applies to:

- members of the Board of Trustees and the Supervisory Board, Assembly and volunteers of Save the Children Italy (henceforth "representatives and volunteers of Save the Children Italy");
- Save the Children Italy staff<sup>1</sup> working full-time or part-time, in Italy or abroad (whether deployed or seconded in SCI/SCA), employed with an open-end or closed-end contract, or collaborating by virtue of a collaboration contract (hereinafter "Save the Children staff");
- donors, journalists, celebrities, politicians and anyone else directly involved in Save the Children projects or services for the entire duration of this direct contact (hereinafter "visitors");
- staff and representatives of partner organisations and any other individual, group or organisation that has formal/contractual relations with Save the Children which entail direct contact with adult beneficiaries (hereinafter the "staff of partner organisations").

<sup>1</sup> Save the Children Italy staff deployed or seconded in SCI/SCA must comply with the SCI PSEAH Policy in force at the time. In the *Secondment Agreement* between SCI/Country Offices and Save the Children Italy, there will be a paragraph indicating the staff of reference and the Focal Points for the PSEAH Policy in force and the procedures in the event of reporting incidents involving Save the Children Italy staff, for the specific country or region of operations.

# 05 GLOSSARY

## PSEAH

English acronym for *Protection against Sexual Exploitation, Abuse and Harassment*. The term used by the United Nations community and NGOs to refer to measures adopted to protect vulnerable people from sexual exploitation, abuse and harassment perpetrated by their own staff and associated staff. This document comprises in the same acronym intimidation, discrimination and abuse of authority.

## Sexual exploitation

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

## Sexual abuse

The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.).

## Harassment

Harassment is unwanted conduct, which aims to or has the effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. This conduct may occur in a single occasion or over several occasions. Harassment can take the form of physical, verbal or non-verbal behaviour.

**Sexual harassment:** harassment of a sexual nature (unwanted physical contact, verbal or non-verbal forms, such as gestures or indecent acts).

**Intimidation:** unreasonable use of one's "status" or authority to request an individual to perform an action or task which the individual knows is inappropriate, illegal or in direct conflict with Save the Children's policies or procedures in force.

**Oppressive behaviour:** any offensive, disrespectful, malicious or abusive behaviour that makes the recipient feel upset, threatened, humiliated or vulnerable.

**Discriminatory behaviour:** disrespectful behaviour that can regard a person's gender, marital status, ethnicity (including the colour of one's skin, nationality, etc.), religion or beliefs, age or disability. This can include intimidation or abuse of authority.

## Beneficiary

Whoever receives assistance, directly or indirectly, from Save the Children or from one of its partners. Alternatively indicated as a member of the affected population, person we seek to assist, person affected by crisis or rights-holder, regardless of the duration of the relationship with Save the Children or with its partners.

**Adult beneficiary:** any beneficiary aged 18+.

**Minor beneficiary:** any beneficiary under the age of 18.

## Communities we work in

Any geographic area Save the Children works in, directly or indirectly, supplying goods or services.

## Disclosure

A beneficiary's act of making known, uncovering or revealing an alleged or ascertained act of sexual exploitation, abuse, harassment or a breach of a Code of Conduct, by speaking to a member of Save the Children (or one of its partners), a family member or another person to the ends of seeking help.

## Internal investigation

An internal administrative procedure through which an organisation seeks to establish if there has been a violation of one of its policies by one or more of its members or persons associated with the organisation obliged to respect said policy.

**“Need to know” principle**

The principle according to which information must be disclosed exclusively on the basis of the actual need to know to the ends of protecting the victim or participating in any processes which have this end.

**Reporting**

The act of informing, according to pre-established modalities, a designated person within the organisation, to bring to their attention an alleged incident which violates a policy and/or that comprised in a policy.

**Victim/survivor**

A person that is, or has been, sexually exploited or abused. The term “survivor” implicates strength, resilience and capacity to survive. This document mainly uses the term “victim” to indicate a victim of actions by an alleged perpetrator. This does not, however, deny the person’s dignity and capacity to act as an individual.

## 06 PSEAH POLICY STANDARDS AND CRITERIA

The following standards and criteria define the minimum levels of reference for adequate Policy implementation, monitoring and evaluation. These standards and criteria will be monitored regularly and updated where necessary.

### 06.1 Awareness raising and prevention

#### a) Dissemination and awareness raising

Save the Children Italy ensures that there is broad dissemination of the PSEAH Policy, the relative Procedure and the Code of Conduct. The dissemination must obviously include the staff of Save the Children Italy, its partner organisations, their volunteers and, above all, adult beneficiaries. The dissemination must guarantee full comprehension of the documents. This may require translations into the languages used by the beneficiaries.

#### b) Staff recruitment and selection

The recruitment and selection of staff, collaborators and volunteers must reflect Save the Children’s commitment deriving from the PSEAH Policy. All checks and possible procedures must be implemented in accordance with the law to prevent anyone who is not suitable from working with us. Suitable candidates are informed of the binding nature of this policy.

#### c) Implementation of the Policy in Management Systems and Processes

The Policy must be incorporated into all existing and future management systems and processes of Save the Children Italy that affect the protection of beneficiaries from sexual exploitation, abuse and harassment so as to guarantee their right to protection.

#### d) Safer Programming, Risk Assessment and Management

All the activities carried out by Save the Children Italy involving adult beneficiaries must be assessed to ensure that risk of SEAH is identified

and suitable checks and controls are developed. Additional measures will be taken into account for those adult beneficiaries with specific skills or needs (for physical reasons, religious or ethnic affiliation, sexual orientation or other factors).

#### **e) Specific training**

Save the Children staff, its volunteers and the staff of partner organisations must be supported in the development of necessary capacities and knowledge for the safeguarding of beneficiaries in line with their role within the Organisation. The staff who have to deal with complaints of sexual exploitation or abuse are provided with suitable training so that they can respond to and deal with the complaints. The fundamental principles of the policy must be included in the induction training of staff and in all subsequent training.

#### **f) Agreements with partner organisations and induction**

Any agreements between Save the Children and project partner organisations must include clauses regarding the PSEAH Policy. Partner organisations must respect the PSEAH Policy, and receive adequate induction to this regard, or have already developed its own PSEAH policy with similar approaches and standards. Agreements with partners must clearly highlight the procedures agreed on for internal reporting and investigating of cases relating to breaches of the Policy.

#### **g) Information and communications technologies (ICT)**

Save the Children pays the utmost attention to guaranteeing that adult beneficiaries are not exposed to risks in using information and communication technologies, such as the Internet, websites, social networks and digital photography. The guidelines contain indications on the use of these technologies for both Save the Children staff and representatives and the beneficiaries using them on behalf of the Organisation, or in response to a request from us. The involvement of adult beneficiaries for purposes related to marketing, communication/ media and advocacy must occur on informed consent and must not

cause exploitation or worsen their conditions, or those of their family members/children, or increase their vulnerability. Where possible, they should not be identified, in particular, by associating personal data, geographic positions or images.

## **06.2 Reporting and responding**

#### **a) Centralised system**

In accordance with current legislation on privacy, Save the Children Italy has a centralised system for reporting, recording and evaluating the complaints received and processed locally.

#### **b) The General Procedure and Local Complaints Procedure**

The general procedure provides a detailed list of what must be done when a report is received. It contains indications regarding how and when to report alleged cases of abuse to the competent authorities, local services and local structures specialised in victim protection. Local procedures can be developed if a specific need is detected. These procedures must nevertheless come under the framework of the general procedure and be connected to it.

#### **c) A complaints mechanism which includes beneficiaries**

Communities and beneficiaries are aware of the behaviour to expect from the staff of the Organisation and its partners; reporting channels are developed to allow for proactive, secure reporting of sexual exploitation, abuse, harassment, intimidation, discrimination or abuse of authority.

#### **d) Obligations of the Staff of Save the Children Italy and its Partners**

Save the Children staff, representatives, volunteers and visitors and those of partner organisations must report any suspicion of sexual exploitation,

abuse, harassment or behaviour characterised by intimidation, abuse of authority or discrimination which involves an adult beneficiary if the alleged perpetrator is connected to the Organisation, regardless of whether it regards a specific report or only unconfirmed suspicions. The primary concern of any staff member that becomes aware of a case of a suspicion of this sort must always be to protect the victims. Reports must be made immediately and, in any case, within 24 hours unless this is not possible or not feasible or there are exceptional circumstances which prevent this.

#### **e) Staff roles and responsibilities**

The Chief Executive appoints a National Focal Point for the PSEAH Policy. Staff, Senior Leaders and People Managers must all be aware of their roles and responsibilities in relation to reporting and responding in accordance with this Policy and national legislation.

Specifically:

- staff are responsible for reporting any suspicions or alleged breaches of this Policy to the local Focal Point;
- the local Focal Point is responsible for receiving these reports and forwarding them to the Senior Leaders & People Managers;
- Senior Leaders & People Managers are responsible for responding to and managing cases;
- the national CSP/PSEAH Focal Point is responsible for managing reports and coordinating the evaluation and response process;
- the CSP/PSEAH Manager, as the person in charge of the General Policy at a national level, is in charge of guaranteeing the operating of a centralised system for the reporting of cases to ensure the management control of these cases.

The Save the Children form for filing reports is attached to this policy.

#### **f) Principles and good practises for responding to reports of sexual, exploitation, abuse and harassment**

In responding to reports involving adult beneficiaries, staff, Senior Leaders and People Managers must follow this policy and must always proceed considering the best practices in favour of the victims, witnesses and any other person involved, in terms of their safety, physical and mental well-being and their rights to privacy, equality and impartial justice. Save the Children staff may be called to collaborate in any investigations and maintain adequate levels of confidentiality. For a more detailed description of the principles and practises referred to in this section, see paragraph 8 “General Procedure”.

#### **g) Constantly learning from experience**

Lessons learned in implementing this policy, for example, in managing specific episodes which may occur, will be used to integrate this policy and develop increasingly better.

## 07 KEY PRINCIPLES FOR RESPONDING TO AND DEALING WITH SEAH CONCERNS AND ALLEGATIONS

Save the Children establishes the General Procedure for reporting and responding to cases of suspected sexual exploitation, abuse, harassment and behaviour characterised by intimidation, abuse of power or discrimination against adult beneficiaries.

The General Procedure is based on the following key principles and actions:

- The Board of Trustees must elect one of its members to manage the implementation of this policy (*PSEAH Trustee*).
- The Chief Executive is in charge of ensuring that national mapping of adult beneficiary protection infrastructures and services is performed in the areas in which Save the Children operates, providing information regarding the existing services, their Policies and functioning procedures and their contacts.
- The Chief Executive must ensure that, based on the information obtained from the mapping, national and local procedures are developed and defined to respond to the reporting of possible cases of abuse and to manage any actions which are subsequently implemented.
- Any breach of the Policy must be reported centrally to the national Focal Point, identified in the Child Safeguarding Policy, and the PSEAH manager.

As provided for by the General Procedure, the Chief Executive must be informed of any reports received and be directly involved in the management of these reports.

Every six months, updates must be presented to the Board of Trustees regarding the implementation of this policy.

Save the Children staff and volunteers, on signing any sort of employment

contract or description of agreed voluntary work, must receive and understand in full the PSEAH Policy and all the information necessary regarding who is to be contacted when filing a report.

All project partners and other organisations that have formal contractual relations with Save the Children that entail direct contact with beneficiaries must include in their contracts the obligation to adhere to all aspects of this Policy and know how to proceed in the event that they have to report an alleged case of sexual exploitation, abuse or harassment of an adult beneficiary.

The violation of the policy can entail, in the most serious cases, the termination of the formal contract.

**All the staff of Save the Children, its volunteers and the staff of partner organisations must:**

- adopt adequate measures to involve and inform the community they are working in regarding behavioural standards which must be respected by their employees and representatives and how to file a report;
- involve and support the communities we work in so that they are aware of their rights to protection from sexual exploitation and abuse, harassment and behaviour characterised by intimidation, discrimination and abuse of power, and the importance and benefits of reporting;
- guarantee that the reporting mechanisms are sensitive to the needs of the communities we operate in and accessible to all the members of these communities.

## 08 GENERAL PROCEDURE FOR REPORTING AND RESPONSE

Whoever is concerned about or becomes aware of episodes of sexual exploitation, abuse, harassment or behaviour characterised by intimidation, abuse of power and discrimination, or any sort of breach of the Code of conduct, to the detriment of adult beneficiaries perpetrated by staff, consultants, volunteers, representatives, visitors, donors, connected to Save the Children or its partner organisations must follow the following general procedure.

Beneficiaries will use specific reporting mechanisms, suited to their specific needs, to directly contact Save the Children or the staff member appointed by the relevant Partner or the Save the Children CSP/PSEAH Focal Point.

This section describes the detailed general procedure for filing a report in two different cases.

### CASE 1

SUSPECTED PERPETRATOR	REPORTER <i>whistleblower</i>
Save the Children staff, representatives, volunteers, and visitors.	Save the Children and partner organisation staff, representatives, volunteers and visitors.

**Staff members, representatives and volunteers, visitors of the Partner organisation will directly access the Save the Children CSP/PSEAH Focal Point and then follow the procedure from phase 3.**

## PHASE 1

Concerns, suspicions or certain cases must be reported confidentially as soon as possible (by telephone, in person or in writing) to your line manager (by the end of that same working day and, in any case, within 24 hours). You should preferably use the Report Form (annex 3), which, in any case, must be completed, possibly at a later time.

If the suspected abuser is the direct superior, the matter may be brought to the attention of the person above them on the hierarchy so that it may be discussed.

If, due to circumstances beyond your control, this person cannot be contacted within the specified time period or if there is a valid reason for not wishing to contact the direct superior, the matter may be reported directly to another person listed in “Main contacts”.

## PHASE 2

The person who received the report will inform the CSP/PSEAH Focal Point confidentially (immediately, by the end of that same working day and, in any case, within 24 hours).

## PHASE 3

The CSP/PSEAH Focal Point will quickly (never more than 24 hours from receiving the report) assess the information received and, along with the manager that forwarded the report, discuss how to proceed in relation to the PSEAH policy. The CSP/PSEAH Focal point will inform the Chief Executive and the Head of the Human Resources Department of the complaint and these three people will form a case management team (under the direction of the Chief Executive). At the same time, the supervisory body will be informed of the report received.

The case management team, after having evaluated the degree of urgency of the case and the most appropriate time-scale for managing the case, may decide to:

1. act based on the information received, reported in detail and assessed;
2. plan an internal investigation, coordinated by the CSP/PSEAH Focal Point, with the sole purpose of obtaining the necessary details or additional elements to be able to take subsequent decisions based on complete information and in a manner which is fair to all parties involved;
3. discuss and agree all action with the manager directly in charge of the person reported.

## PHASE 4

The case management team, based on the information at their disposal and based on the seriousness of the case, may decide to:

- a. mitigate or minimise concerns when, for example, following an initial evaluation, the relevant details of the case are not confirmed;
- b. decide to launch disciplinary action against the person reported on communicating this decision to their Line Manager and the Head of Department of the said person;
- c. decide if the case must be deferred, with the victim’s consent where necessary, to the law enforcement agencies and the judicial authorities, and to an external social support network. Should this happen, the team will call a Crisis Unit, formed of the Management, the Head of Department of the subject of the complaint and the CSP/PSEAH Focal Point. The unit may request the opinion of one or more previously-identified external experts.

The Crisis Unit is under the direct responsibility of the Management and has the task of:

- guaranteeing, first and foremost, the safety of the adult beneficiary, deciding on specific measures and an action plan;
- discussing and establishing the best way to guarantee Psychological First Aid;
- supporting the victim in getting adequate legal support;
- deciding to set up an internal action plan to monitor the progress of the case (including role sharing, responsibilities and time scales) and to closing the case;

- confidentially informing the Head of the Communications Division, on a strictly “need-to-know” basis, in order to prepare a possible communications strategy;
- informing the CSP and PSEAH Board Trustee of the decision to make an official report or complaint against the member of staff or representative of Save the Children.

**PHASE 5**

All records and documentation will be archived securely at the CSP/PSEAH Focal Point for the duration of the case and shared in the strictest confidence, only on a strictly “need-to-know” basis.

**PHASE 6**

Adequate feedback and support will be provided to all parties involved until the case is closed.

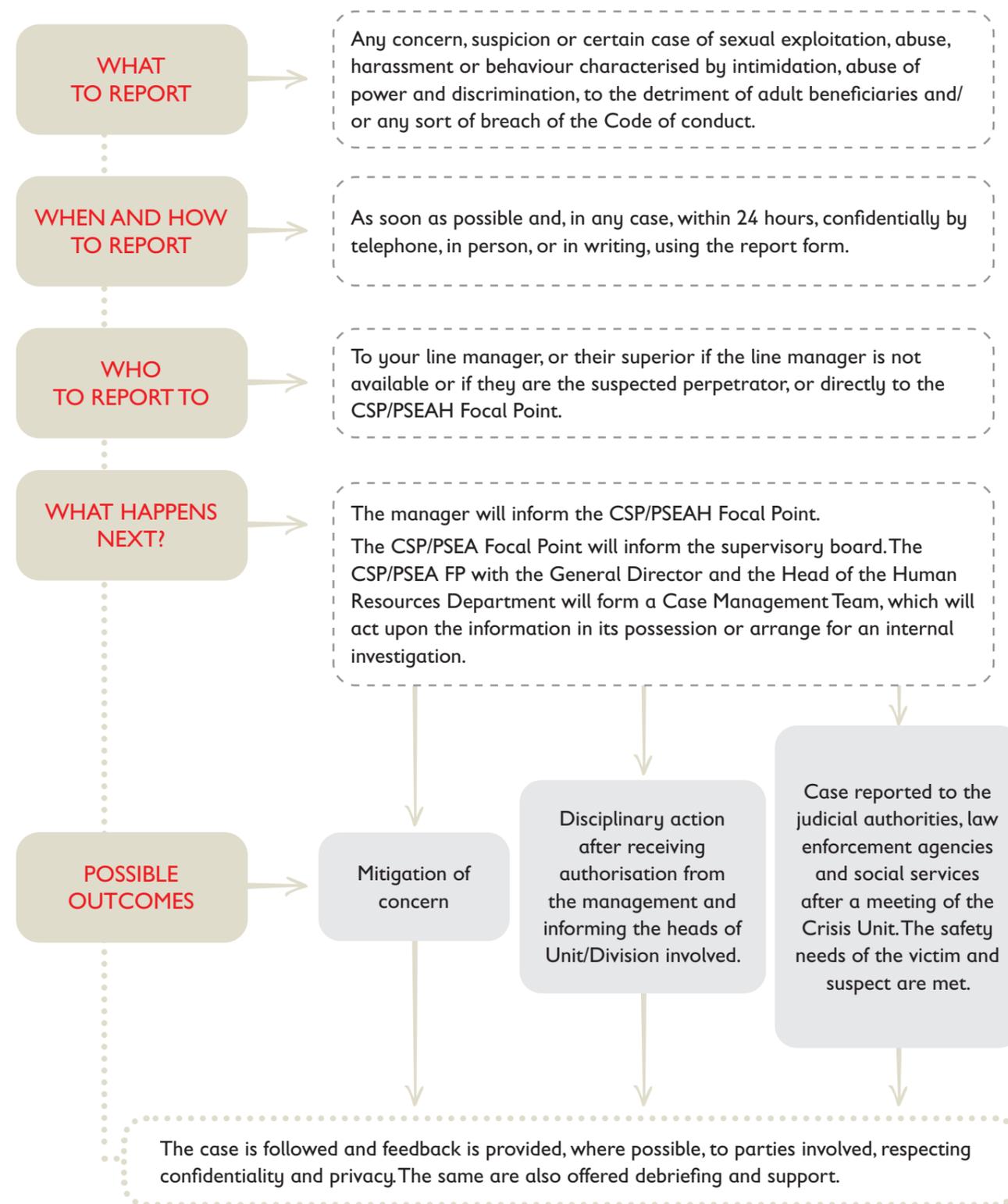
**PHASE 7**

Central recording of all reports. Anonymous and general information on all complaints received will be sent to the CSP/PSEAH Board Trustee (every semester) and to the supervisory body.

**FLOW CHART - CASE 1**

**Suspected perpetrator:** Save the Children staff member, representative or visitor.

**Whistleblower/reporter:** staff member, consultant, volunteer, representative or visitor (Save the Children), adult beneficiary, Partner.



## CASE 2

SUSPECTED PERPETRATOR	REPORTER <i>whistleblower</i>
Staff members, representatives, volunteers, and visitors of a Save the Children Partner organisation.	Staff members, representatives, volunteers, and visitors of Save the Children or a Save the Children Partner organisation.

There may be two different situations depending on whether:

- a. when the partnership began, the partner organisation had its own Policy, Code of conduct and General Procedure for PSEAH, already examined and confirmed by Save the Children;
- b. when the partnership began, the partner organisation did not have its own Policy, Code of conduct and General Procedure for PSEAH, and signed the Save the Children PSEAH, obliging its staff to refer to this when they report or respond to cases of suspected SEAH or if there are breaches of the code of conduct to the detriment of adult beneficiaries within the projects or activities in which it is a partner of Save the Children.

Beneficiaries will use specific reporting mechanisms, suited to their specific needs, to directly contact the partner's staff member (case a), the Save the Children staff member or the CSP/PSEAH Focal Point (case b).

### Situation a)

**When the partnership began, the Partner had its own PSEAH and General Procedure, which were ratified by Save the Children Italy.**

#### PHASE 1

The partner will activate its own Procedure for PSEAH. Staff members, representatives, volunteers and visitors of Save the Children partners will follow the Partner's PSEAH procedure.

#### PHASE 2

The internal contact appointed by the partner organisation (the person receiving the complaints) will inform Save the Children (generally during the same working day) via the project manager or the head of the unit representing the partnership. This person will then inform the line manager and the CSP/PSEAH Focal Point. Save the Children may ask the complaint to be made in writing where it has only been made verbally.

#### PHASE 3

The Save the Children CSP/PSEAH Focal Point will follow the partner throughout the reporting process and case management.

#### PHASE 4

The partner will act according to a pre-established time-scale and will provide Save the Children with specific details. The partner will record all the information in writing, according to privacy regulations, and will conserve these securely.

#### PHASE 5

The partner will provide Save the Children with constant feedback regarding any action taken and the results of this action (generally within three months).

**Situation b)**

**When the partnership began, the Partner did not have its own PSEAH Policy. It has signed the documents of Save the Children Italy and currently refers to these when reporting and responding to cases of SEAH to the detriment of adults beneficiaries or breaches of the Code of Conduct occurring within the projects and activities in which it is a partner of Save the Children.**

**Staff members, representatives, volunteers, and visitors of the Save the Children Partner organisation will directly contact the Save the Children CSP/PSEAH Focal Point. They will then follow the procedure from phase 3.**

**PHASE 1**

Concerns, suspicions or certain cases must be reported as soon as possible (by telephone, in person or in writing) to one's line manager within the partner organisation (by the end of that same working day and, in any case, within 24 hours).

You should preferably use the Report Form (annex 3), which, in any case, must be completed, possibly at a later time.

If, due to circumstances beyond your control, this person cannot be contacted within the specified time period or if there is a valid reason for not wishing to contact the line manager, the matter may be reported directly to another person listed in "Main contacts" (Annex 2).

**PHASE 2**

The person who has been forwarded the complaint will inform the Save the Children CSP/PSEAH Focal Point confidentially (immediately, by the end of that same working day and, in any case, within 24 hours). This too must be done using the report form (annex 3) as soon as possible.

**PHASE 3**

The CSP/PSEAH Focal Point will quickly (never more than 24 hours from receiving the report) assess the information received and, along with the person that forwarded the complaint (or whoever is appointed to do so by the partner), discuss how to proceed in relation to the PSEAH policy. The CSP/PSEAH Focal Point will officially inform Head of Department of Save the Children liaising with the partner of the complaint. They will form a case management team along with these people and the person who received the report.

The case management team, after having evaluated the degree of urgency of the case and the most appropriate time-scale for managing the case, may decide to:

1. act based on the information received, which has been reported in detail and assessed;
2. plan an internal investigation, coordinated by the CSP/PSEAH Focal Point, with the sole purpose of obtaining the necessary details or additional elements to be able to take subsequent decisions based on complete information and in a manner which is fair to all parties involved;
3. discuss and agree any action with the line manager of the subject of the complaint.

**PHASE 4**

The case management team, based on the information at their disposal and based on the seriousness of the case, may decide to:

- a. mitigate or minimise concerns when, for example, following an initial evaluation, the relevant details of the case are not confirmed;
- b. decide to request disciplinary action against the person reported;
- c. decide if the case must be referred, with the victim's consent where necessary, to the law enforcement agencies and the judicial authorities, and to an external social support network. Should this happen, the team will call a Crisis Unit, formed of the Management, the Head of Department related to the subject of the complaint and the CSP/PSEAH Focal Point and the representative of the management of the partner organisation; The crisis unit may request the opinion of one or more previously-identified external experts.

The Crisis Unit is managed by Save the Children’s General Management and will guide and support the partner organisation in:

- guaranteeing, first and foremost, the safety of the victim, and then of all the other involved parties, and deciding on specific measures and an action plan;
- discussing and establishing the best way to guarantee psychological first aid;
- supporting the victim in getting adequate legal support;
- deciding to set up an internal action plan to monitor the evolution of the case (including role sharing, responsibilities and time scales) and closing the case;
- confidentially informing the Head of the Communications Division, on a strictly “need-to-know” basis, in order to prepare a possible communications strategy;
- informing the CSP/PSEAH Board Trustee of the decision to present a report or official complaint against the Save the Children partner organisation staff member;
- informing the supervisory body of the outcome of the investigation.

**PHASE 5**

All records and documentation will be stored securely by the CSP and PSEAH Focal Point for the duration of the case and shared, in the strictest confidence, only on a strictly “need-to-know” basis.

**PHASE 6**

Adequate feedback and support will be provided to all parties involved until the case is closed.

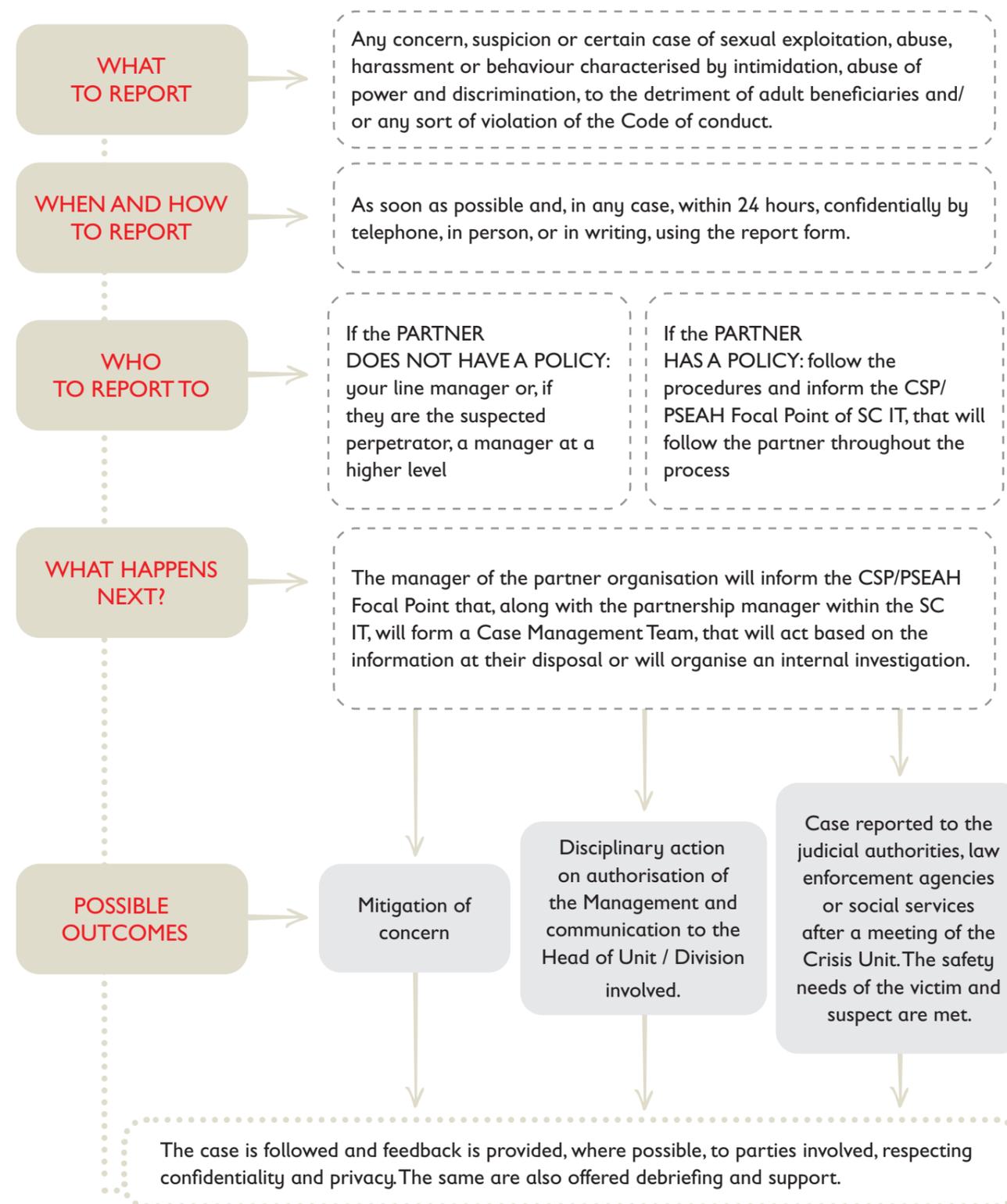
**PHASE 7**

Central recording of all reports. Anonymous and general information on all complaints received will be sent to the CSP/PSEAH Board Trustee (every semester).

**FLOW CHART - CASE 2**

**Suspected perpetrator:** Save the Children partner staff member, representative or visitor.

**Whistleblower/reporter:** a) Save the Children partner staff member, consultant, volunteer, representative or visitor; adult beneficiaries; b) Save the Children staff member, consultant, volunteer, representative or visitor.



# 09 CODE OF CONDUCT

Staff and all other representatives of the Organisation must never:

1. implement behaviour which entails sexual exploitation, abuse and harassment of our adult beneficiaries;
2. Support or participate in any form of sexual exploitation, abuse or harassment of adult beneficiaries;
3. Harass, intimidate or abuse one's power in relation to adult beneficiaries;
4. Implement any form of behaviour which is humiliating, degrading or characterised by dynamics of sexual exploitation or abuse of adult beneficiaries;
5. Abuse of the position of trust which they enjoy to gain personal benefits of any nature from beneficiaries;
6. Have sexual relations with adult beneficiaries due to the intrinsic conflict of interests and the power gap in these relations;
7. Fail to report any certain case, concern or suspicion of sexual exploitation, abuse and harassment by other staff, representative or volunteer of Save the Children, including Partners, to the detriment of adult beneficiaries.

Staff and all other representatives of the Organisation must always:

8. Treat beneficiaries and members of the community in which we operate with dignity and respect;
9. Be aware of their position of trust and the power gap in relation to the community and the beneficiaries with whom we work so as to act appropriately and with respect;
10. Actively contribute to the creation and maintenance of a culture which prevents sexual exploitation, abuse and harassment, encourages reporting, and promotes the relative Save the Children Policies;
11. Be aware of the fact that sexual exploitation, abuse and harassment are serious acts, which are criminally punishable and can entail employment contract termination;
12. Treat any information communicated to them in relation to any complaints and manage suspicions of sexual exploitation, abuse and harassment confidentially;
13. Collaborate fully and promptly to any internal investigation connected to this Policy. Deliberately providing false information or acting deceitfully in the context of an internal investigation can lead to disciplinary measures.

# 10 MAIN CONTACTS

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PSEAH Focal Point email and hotline	PSEAH & CSP Manager
Dedicated reporting line 24/7 <b>+39 345. 9544926</b>  e-mail <b><a href="mailto:segnalazioni.pseah@savethechildren.org">segnalazioni.pseah@savethechildren.org</a></b>	<b>Laura Lagi</b> Office <b>+39 06. 48070002</b> Mobile <b>+39 340. 1399514</b>  e-mail <b><a href="mailto:laura.lagi@savethechildren.org">laura.lagi@savethechildren.org</a></b>

# 11 ANNEX

## Report form

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The following two pages contain the separate report form so that it can be printed easily.

Programme/Place:

Beneficiary first name and surname:

Report details

Date: Time: Place:

Reporter details

First name and surname: Address:

Main telephone N°: Job:

Relationship to beneficiary:

Beneficiary details

First name and surname: Age: Date of birth:

Gender: Address: Nationality:

Language spoken: Any specific conditions of vulnerability:

Other:

Details of alleged abuse: what, who, where, when *(including testimony of interested party if collected)*

Details of Suspected Perpetrator *(of known)*

First name and surname: Address:

Date of birth: Job: Relationship to beneficiary:

Current safety conditions of beneficiary *(including information regarding whether the place they are staying in is safe, if they have expressed fears to be taken into considered, etc.)*

Does the beneficiary require emergency medical care?

*(If so, indicate who (service, name of staff member, contact details) and indicate if it was provided)*

Who else is aware of the case?

Agency, body, organisation, other:

Actions taken to date *(e.g. reported to judicial authorities, other. Specify place and day, type of action taken, parties involved and their contact details)*

Reported by:

*(if this is the same person filing the report, do not complete)*

Name: Role and place:

Date: Signature:

**This section must be completed by the manager addressing the report.**

Name: Position:

Place:

Date and time report received:

Are any decisions already taken in line with PSEAH Policy?

Have the judicial authorities been involved?

*(Yes/No, specify reason)*

What other action has been taken to guarantee the safety of the beneficiary?

Has medical intervention been requested?

Date and time of medical intervention:

 **NOTES**

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A series of horizontal dashed lines for writing notes.

We, at Save the Children, want every child to have a future. Every day we work passionately, with determination, and professionalism, in Italy, and in the rest of the world, to give children the opportunity to grow up healthily, get an education and be protected.

When there is an emergency, we are among the first to get there and the last to leave. We collaborate with local bodies and partners creating networks to help us satisfy the minors' needs, guarantee their rights and listen to their voices.

We improve the lives of millions of children, including those who are difficult to reach, in concrete ways.

For more than 100 years, Save the Children has fought to save children at risk and guarantee them a future.



**Save the Children**

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