

# Policy for preventing and combating harassment, abuse and other conduct detrimental to integrity and dignity

***PSEA Policy: Prevention of /  
Protection against sexual  
exploitation and abuse***

VOLONTARIATO INTERNAZIONALE  
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Organismo Non Governativo - Onlus • Promosso dal CNOS - Centro Nazionale Opere Salesiane  
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## ABBREVIATIONS AND ACRONYMS

AICS: Italian Development Cooperation Agency  
 ATS: Temporary Association of Purpose  
 AUDEX: External Auditor  
 AUDIN: Internal Auditor  
 C/B: Bank account  
 CCP: Civilian Peace Corps  
 CE: VIS Executive Committee  
 COGE/COAN: General and analytical accounting.  
 CRFPC/Desk: Regional Finance, Planning and Control Coordinator and FPC Desk at headquarters.  
 CRP/Desk: Regional Programs Coordinator and Programs Desk at Headquarters.  
 DCOM: Department of Communication  
 DCRF: Campaigning & Fundraising Department.  
 DFPC: Department of Finance, Planning and Control  
 DG: General Management  
 DP: Program Department  
 EC: European Commission - European Commission  
 ECG: Education for Global Citizenship.  
 ECHO: European Commission Humanitarian Office  
 ED. DD/MM/YEAR: Edition dd/mm/year (last updated and/or approved)  
 ETM: Thematic Expert  
 FACQ: Purchasing function  
 GEST: Management  
 IT: Information Technology  
 MAECI: Ministry of Foreign Affairs and International Cooperation  
 MoU: Memorandum of Understanding  
 SB: Supervisory Board (pursuant to Legislative Decree 231/2001)  
 NGO: Non-Governmental Organization  
 NPO: Non-Profit Organization of Social Utility  
 OOI: International Organizations  
 OSC: Civil Society Organization  
 PCM: Project Cycle Management  
 PDC: Chart of Accounts  
 PG/PRAG: Practical Guide Europeaid  
 PM: project manager/project leader  
 PN: First Note (PN file or record)  
 PPs: Partner Countries  
 PRES: President  
 PRMG: program manager/head of program.  
 RAL: Administrative Manager in Loco  
 RDCOM: Head of Communication & Digital Department  
 RDCRF: Head of Campaigning and Fundraising Department.  
 RDFPC: Head of Finance, Planning and Control Department.  
 RDP: Program Department Manager  
 REV: Control Body (formerly Auditor(s))  
 RPL: Country Manager/Representative in Loco.  
 RR.UU: Human Resources Department  
 RRU: Head of Human Resources Department  
 SAD: Distance Support  
 SAM: Supporting missionary activities  
 SCU: Universal Civil Service  
 SDGs: Sustainable Development Goals  
 TES: Treasurer  
 EU - EU: European Union - European Union

## 1. Introduction

This *Policy for Preventing and Combating Harassment, Abuse, Bullying and Other Conduct Detrimental to the Integrity and Dignity of Individuals* is an integral part of VIS's *safeguarding* system, i.e., the set of procedures and practices designed to ensure the body's commitment to prevent, respond to and protect individuals from inappropriate behavior attributable to violations of the Code of Conduct where, moreover, Art. 4 it is provided that "*VIS has a policy of 'zero tolerance' with regard to the abuse and exploitation of persons, in particular, of children and the recipients of its interventions, and is committed to ensuring that all of its workers and collaborators, visitors, assignees, suppliers, sub-contractors and implementing partners operate with respect for and protection of the fundamental rights and dignity of persons.*"

In addition, this policy complements and implements the principles and requirements of the Organizational Model drawn up pursuant to Legislative Decree 231/200, aimed at the prevention of crimes, and incorporates the latest guidelines of international bodies, governmental and non-governmental agencies operating in the field of development cooperation and humanitarian aid.

This document reaffirms and reinforces our commitment, as OSC, to caring for the people and recipients of our interventions, in partner countries and in Italy. In this sense, this policy and VIS's *safeguarding* system in general are based precisely on the approach of putting at the center of its attention and commitment the interest and needs of the person who has suffered harassment and abuse, with the aim of supporting and sustaining them. Given the significance and delicacy of the subject, which lends itself little to a crystallization and standardization of conduct that can be considered harmful, especially because of the different cultural and religious contexts in which VIS operates, the primary importance is precisely given to the person, through a system of dissemination of information and knowledge, which can be as accessible and understandable as possible, aimed at making effective the moment of prevention, control and contrast of conduct perpetrated in violation of the law and the Code of Conduct of the body.

In order to create and maintain a work environment that is safe and inclusive for all and everyone, it is noted from the outset that all recipients of the policy have the right and duty to **report any violation of** its contents, that is, any circumstance in which staff and recipient(s) are or may be at risk of abuse and/or inappropriate behavior, situations of which they become aware directly or indirectly in the workplace, while performing their duties or in the course of their established relationship - in whatever capacity - with the body.

## 2. Policy function and stakeholders

2.1 This policy is an integral part of the VIS Code of Conduct, which constitutes the set of values on which the body's actions are based and the principles whose observance is considered of fundamental importance for the body's smooth operation, management reliability, credibility and image.

2.2 The main purpose of this policy is to prevent and combat any behavior that can be attributed to the following offenses: sexual abuse, sexual exploitation, sexual or moral harassment, bullying as well as any other behavior that violates the dignity and honor of the person.

2.3 Such behaviors may be enacted by:

- Expatriate or local VIS employees, collaborators and/or consultants;
- volunteers, trainees, SCU staff, CCP, and anyone else who happens to work with VIS for any relationship of work, training, research, philanthropic, religious, etc;
- volunteers, collaborators and occasional visitors, i.e., people included not permanently but only for short periods in the activities of the organization, in Italy or abroad;
- individuals belonging to VIS partner organizations (national and/or international, *implementing* and/or *funding* partners) and anyone working or collaborating with them;

- persons referring to civil society organizations, institutions, associations and other stakeholders, who work/collaborate in any capacity with VIS.

2.4 Conduct engaged in by the individuals specified above with respect to:

- Expatriate and/or local VIS employees, staff and/or consultants;
- volunteers, trainees, SCU staff, CCP, and anyone else who happens to work with VIS for any other relationship such as employment, training, research, philanthropic, religious, etc;
- volunteers, collaborators and occasional visitors, i.e., people included not permanently but only for short periods in the activities of the organization, in Italy or abroad;
- beneficiaries/recipients of institutional programs and activities promoted and implemented by VIS and/or in which the organization is involved.

2.5 The provisions of this policy must be adhered to in all relationships and all activities carried out in the name of and on behalf of the VIS and/or in its interest and/or, in any case, referable to it in any way, whether carried out internally or externally. Compliance with the provisions set forth in the policy is an integral and essential part of the contractual obligations related to any activity, in particular employment contracts (of any kind) and other contractual or agreement-based rules/provisions.

2.6 The PSEA also applies to those for whom it is intended for violations committed outside of work.

2.7 This policy will be made known to all stakeholders (such as members, presidia, participants, volunteers, workers and collaborators, donors, suppliers, partners, etc.), through direct dissemination among *stakeholders* (including through sharing of appropriate repository in the body's drive) and publication and/or promotion on VIS information/dissemination channels, according to the directions established for this purpose by the CE.

### **3. Bodies and individuals designed to ensure preventive and law enforcement measures**

3.1 To help make the prevention and law enforcement measures that this policy outlines effective, VIS has entrusted the coordination of the *safeguarding* system (guardianship and protection) to a collegial body of at least three members (preferably women): the *Safeguarding Focal Point* - SFP ([safeguarding@volint.it](mailto:safeguarding@volint.it)), who operate at the body's headquarters. This body, appointed by the EC, is responsible for the implementation of *safeguarding* policies and, for this, coordinates, monitors and sensitizes staff at headquarters and in the field, in the implementation of Child and Adolescent Protection Policies (CSPs) and policies to prevent and combat harassment, abuse and other conduct detrimental to the integrity and dignity of persons (so-called PSEA Policy).

3.2 SFP may appoint *Focal Points at the national level* to have ad hoc points of reference in the country-offices on these issues and to facilitate the implementation of *safeguarding* policies. In any case, at the Offices-country level, the responsibility for implementation of *safeguarding* policies (CSP and PSEA) rests with RPL, assisted by SFP both headquarters and local (if appointed).

3.3 Because of the centrality and sensitivity of the personnel selection and management system and the relevance of the cases considered by this policy to RRU policies, VIS appoints a member of its RRU Department as a member of the PFS.

3.4 The RRUU department at headquarters and those responsible for local staff recruitment activities at the country-offices perform key functions with great relevance to the subject of this policy, as they are responsible for assessing the suitability of staff during the identification, selection, induction, and training stages. Monitoring and evaluation of staff are also constant during the employment relationship and carried out through individual interviews and follow-up activities conducted in collaboration with other staff members (on-site and in-house). As already specified, criteria and methods of staff selection,

management and follow-up oriented toward the prevention of the behaviors covered by this policy must be followed uniformly both at headquarters and at the country offices.

3.5 Pursuant to the Code of Conduct and Model 231/2001 adopted by VIS, the SB is the terminal of the *Whistleblowing* system and of any other information and reporting mechanism concerning possible crimes and/or conduct that can be considered as perpetrated in violation of and/or detrimental to the contents of the Code and Model and, therefore, also the behaviors taken into consideration by this policy. The SB is therefore responsible to educate and investigate the reported violations and formulate the findings to the EC for the adoption of any appropriate measures, including termination of employment and referral to judicial authorities. To carry out its functions, the SB may make use of all components of the organizational structure of VIS and may request additional tools to support its action.

#### **4. Glossary/Definitions**

*Personnel*: employees and collaborators contracted by VIS in Italy and abroad, volunteers in SCU or of the CCPs, trainees, researchers, and anyone otherwise in a collaborative relationship with the organization.

*Occasional visitor-collaborator*: anyone who comes into contact with VIS on an occasional basis and/or for a specific purpose (campaign, specific action, press mission, consultancy, etc.). The occasional visitor must fall under the supervision and responsibility of the staff in charge of his or her employment, who have a duty to inform him or her about the stipulations of the Code of Conduct and related protection policies.

*Recipient*: any person who, as part of VIS interventions in partner countries or in Italy, receives goods or services free of charge or is otherwise the recipient of activities and results oriented toward them.

*Partners*: organizations and social formations that promote, fund and/or implement activities jointly and/or in cooperation with the body.

*Victim*: anyone who has suffered acts attributable to the behaviors covered by this policy.

*Reporting-Informative Reporting*: a mechanism through which a person related to VIS or its partner or involved in any capacity in the activities of the body, having become aware of any of the behaviors covered by this policy, reports the fact directly to the SB, or to PRES, SFP, another colleague or superior.

*Sexual abuse*: any behavior or threat consisting of a physical intrusion of a sexual nature, perpetrated by force or otherwise under coercive or unequal conditions.

*Sexual exploitation*: any conduct, even if only attempted, of abusing positions of vulnerability, imbalance in power or trust, for sexual purposes, including conduct designed to profit momentarily, socially or politically from the sexual exploitation of others.

*Sexual harassment*: repeated, unwanted, and unacceptable conduct and practices of a sexual nature, including invitations, demands, requests for sexual favors, verbal or physical conduct, or gestures, that might reasonably be perceived as offensive or humiliating.

*Moral harassment*: repeated hostile behavior, directed against an individual, with physically or psychologically persecutory intent, protracted and systematic, likely to create an environment that is disrespectful, humiliating, or detrimental to the person's psychological and physical integrity or dignity.

#### **5. Behaviors subject to prevention and countermeasures**

5.1 All those acts that can be traced to the cases of sexual abuse, sexual exploitation, sexual harassment and moral harassment as defined above shall constitute behaviors subject to the prevention and counteraction measures adopted by this policy.

5.2 The measures of prevention and contrast apply to all internal relationships between VIS staff, whether local or expatriate, structural or occasional, as well as between the organization's staff and beneficiaries. VIS also implements this policy with respect to partners, to whom the prevention and law enforcement measures therefore extend.

## 6. Prevention measures

6.1 In order to prevent the behaviors specified above, VIS through RRUU, during the recruitment, selection and training of expatriate personnel, adopts specific and particularly careful control measures on those who will go to work in the partner-countries (see attachments).

6.2 The RR.UU. office assesses, on the one hand, the suitability of the personnel for carrying out activities in particularly fragile contexts and, on the other hand, the ability to prevent and counteract any behaviors and abuses that may have been committed. During the selection phase, a careful analysis is therefore carried out of the references indicated by the staff and/or those that can be inferred indirectly from the candidates' educational and professional background. The topic of sexual harassment and abuse is the subject of analysis and discussion during the interview phase, in order to carry out an assessment of the sensitivity of candidates to issues of abuse and violence. The selection criteria and methods adopted by RRUU at headquarters, which are oriented toward the prevention of the behaviors covered by this policy, must also be followed in the recruitment activities of local staff at the country offices. To this end, RRUU at headquarters will issue guidance and instructions in this regard to the Country Offices and, in particular, to the RPLs.

6.3 Staff and collaborators are required to submit and sign a self-declaration or submit criminal records attesting to the absence of past instances of harassment and/or abuse, involvement in sexual exploitation cases with, as well as - through the contract - the assumption of the obligation to abide by the "tolerance-zero" principle established by the VIS Code of Conduct and this policy.

6.4 VIS shall ensure - in staff training - specific modules to educate/train staff about the procedures set forth in the Code of Conduct, this policy, CSP and CRM Policy, as well as the internal bodies responsible for their implementation. The training will focus on the phenomenon of harassment and abuse and related case studies, through practical examples to simplify understanding. Without prejudice to the application of the PSEA, staff going to work in partner countries will also receive information about essential Italian and national regulations governing sexual exploitation, abuse and harassment.

6.5 Preventive action is also ensured by constant communication established between SFP and field staff, through individual and confidential interviews, carried out by ensuring confidentiality and putting the victim's needs at the center.

6.6 In order to ensure the effectiveness and efficacy of the measures provided for in this policy, VIS will make the PSEA available to all its recipients, delivering it and/or integrating it into the Management System accessed via cloud by all staff, publishing it on its website, and providing on contracts and agreements with third parties ad hoc clauses. By the same means, the contact of the SB will be made known as the terminal of the information/reporting system [odv@volint.it](mailto:odv@volint.it).

6.7 In country offices, particularly in the context of activities involving the target audience(s), through CRM Policy dissemination tools, the contents of the PSEA and useful contacts on the ground by way of *safeguarding* should be made known. Communication to the target audience(s) should be in local language and adapted to be easily understood. In all cases, VIS staff must make themselves available to receive and listen to complaints and reports from victims, without offending or denigrating, proceeding immediately to report to the BOD, PFS or any other contact person deemed accessible and trusted, and ensuring all support for the victim.

## 7. Actions to respond to and combat PSEA violations.

### 7.1 Modes of reporting

All recipients of this policy have the **right and duty to report** any violation of its contents, any circumstance in which any person (among those identified by this policy) is or may be at risk of abuse and/or inappropriate behavior, and situations of which they become aware in the workplace and/or while performing their duties and/or in the course of the relationship established in any capacity with VIS.

**Relevant reports must be made, including anonymously, to the SB - [odv@volint.it](mailto:odv@volint.it)** and can be made by telephone, in person, by e-mail, via webform (if arranged) or any other useful existing channels (including those arranged as part of the implementation of the CRM Policy).

Any VIS operator, if he/she becomes aware of information that may presume a violation of this policy, is required to invite the person concerned to report it to the SB or may report in the second person to the SB the facts of which he/she has become aware, ensuring the confidentiality of the source. If the *Safeguarding Focal Point* ([safeguarding@volint.it](mailto:safeguarding@volint.it)), in the course of carrying out its duties in implementing this policy, becomes aware of alleged violations of the PSEA, it is required to immediately report such matters to the SB.

Violations of this policy may also be the subject of the reporting system configured by the *Whistleblowing* procedure.

It is, in addition, the responsibility of VIS to adopt and implement, in all the countries in which it operates, a system for handling complaints and feedback to enable communities involved in activities, projects and programs to report problems related to the PSEA. In this sense, the CRM Policy constitutes a fundamental tool for informing and dealing with the cases covered by this policy.

The Code of Conduct, Model 231/2001 and VIS procedures stipulate:

- those required to report: staff, collaborators, volunteers, recipients and other stakeholders have the right/duty to report, enjoying the right to confidentiality and non-retaliation;
- timelines necessary to ensure the rapid activation of the responsible persons, the immediate start of the investigation by the SB, and the adoption of the necessary measures and steps to deal with the case, including measures to protect the victim;
- methods of reporting the problematic case, even in anonymous form: e-mail to the SB [odv@volint.it](mailto:odv@volint.it), paper letter to the address of the VIS, *Via Appia Antica 126, 00179 Rome - Italy*, addressing it to the PRES or to the SB or to another person deemed trustworthy, as well as any other mode of information accessible and considered reliable. In any case, the SB will constitute the terminal of the reports that have as their object the cases considered by this policy;
- The right/duty of disclosure is assigned to all staff and stakeholders of the body and, therefore, the case can be reported to the SB directly or indirectly by third parties who become aware of it;
- The methods of proper storage of all documentation for the purpose of protecting personal and sensitive data.

### 7.2 Response

VIS guarantees that:

- any problem inherent in the protection of victims of abuse, harassment, and any other act detrimental to personal dignity, or any allegation of abuse or inappropriate behavior is promptly taken up and that the investigation and inquiry is conducted until the case is closed. Complainants and victims have the right to receive timely feedback on the developments and outcomes of their case;

- cases of suspected PSEA violations are handled by competent people, and investigations are conducted and shared among several people;
- strict confidentiality is respected at all stages of the investigation and that information/findings will be shared only when necessary functional to the completion of the proceedings.

The protection and safety of victims must be ensured throughout the case management process; when deciding on a case of suspected, alleged, or proven abuse or inappropriate behavior absolute priority must be given to the interest and welfare of the victim. VIS ensures that the assessment of the risks faced by victims is conducted in a timely manner, and that any decision and subsequent action is taken without delay.

Individuals accused of violating this policy should be given the opportunity to report their side of the story. If the allegation is confirmed, all appropriate disciplinary action should be taken, including immediate termination of the employment contract and, where appropriate, initiation of legal action (complaint/solicitation to the appropriate authorities) against the person who committed the abuse or inappropriate behavior, in accordance with applicable regulations.

In the event that, at the end of the investigation, it turns out that the report was intentionally false or made for personal interests, appropriate disciplinary measures will be taken by the CE against the person who made the accusation, up to and including reporting to the relevant authorities if there are grounds for such action.

VIS is committed to ensuring that every person actually found to be a victim of violence, abuse, and harassment by members of its staff or associated personnel (including partners) has access to psychological support, medical treatment, and legal assistance, determining such support on a case-by-case basis and considering the extent of the violation.

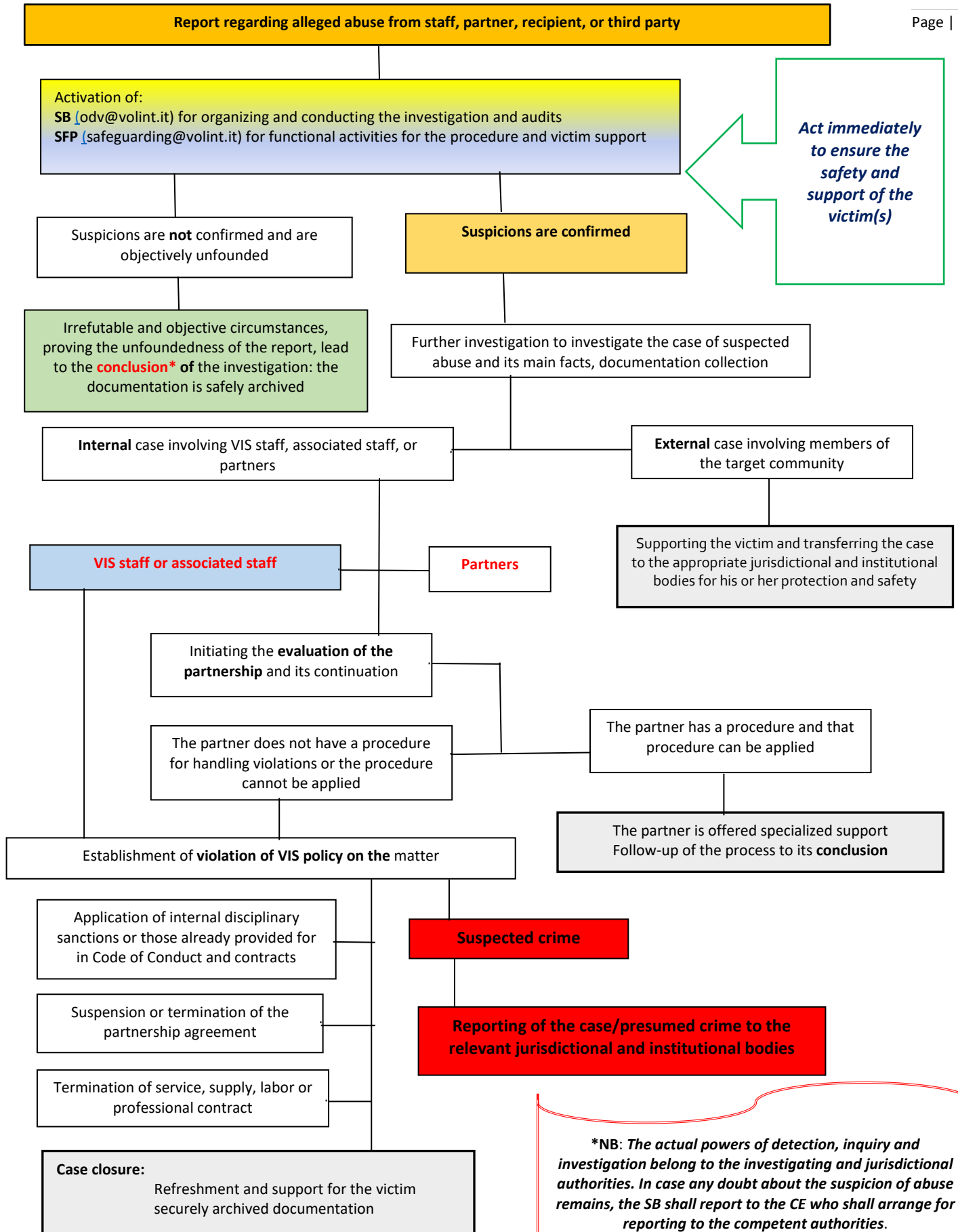
A complete record of cases should be kept in secure and protected files, both in the country offices and at headquarters. ODV, also involving SFP, maintains a database of all cases and prepares a report on child protection violations to be shared annually with the EC.

### 7.3 Timing

Generally, given the significance and sensitivity of the cases covered by the PSEA, from the time of the report, the decisions resulting from the audit and related to its resolution (i.e., the definition of the consequent acts and the initiation of their implementation) must be made as soon as possible and - in any case - **no later than 15 days** after the report, unless there are force majeure or other extraordinary circumstances (including any needs for the protection of the victim) that delay the normal course of the work of the bodies in charge and/or the taking of the relevant decisions.



## 7.4 Standard procedure for handling cases of PSEA and CSP violations.



## 8. Sanctions

8.1 SB, after investigating the reported facts, if it verifies that conduct integrating the cases of sexual and/or moral abuse and/or harassment as well as practices referable to sexual exploitation has been committed, shall immediately report such conduct to the EC for submission to the competent authorities (Italian and/or national).

8.2 In the event that ODV ascertains the commission of such conduct by VIS personnel, in line with the provisions of the zero-tolerance policy adopted by the Code of Conduct, it shall report to the CE for it to order the immediate termination of the employment contract or collaboration relationship and any other decision deemed useful as a sanction.

## 9. Support measures

9.1 If the harmful behaviors covered by this policy are established, VIS shall ensure support measures geared toward meeting the needs of the victim, bearing any court costs and ensuring contributions and/or compensation for the victim and his or her family.

9.2 The extent and form of support measures shall be determined by the CE, including on the basis of opinions expressed by SBs and SFPs, after consultation with the victim of the case.

## 10. Malicious reporting

In the event that the SB, at the end of the investigations conducted by the same body or by the competent authorities, has ascertained that the reported conduct never took place and that the report was made in bad faith by the person who forwarded the report, i.e., with the intention of obtaining compensation and/or harming the person indicated as responsible for the acts, will report these findings to the CE for it to take the measures deemed necessary according to a "case by case" assessment, up to and including termination of the employment or professional relationship, reporting to the competent authorities for slander or other configurable crime, and requesting any compensation.

## 11. Accountability, monitoring and policy review

All members of the body and staff are responsible for ensuring that this policy and related procedures are implemented. The DG, as mandated by the EC, is responsible-using the PFS for this purpose-for implementing the *PSEA Policy*. At the next levels, the other apex, desk and RPL functions are responsible for the implementation of the policy in their areas of responsibility and in individual country offices.

SFP will carry out annually, in conjunction with the DG and preferably at the start of activities after the summer break, a self-assessment to be shared with the CE and the SB on the implementation of this policy, to monitor, organize and plan activities useful for its implementation and to identify any areas for improvement. This self-assessment will be used to identify areas and actions for improvement of the body's PSEA and to carry out planning for the following year.

This policy may be updated as it progresses during its implementation and-in any case-shall be subject to review at least every 5 years. This activity will be coordinated by the DG assisted by SFP, and should be carried out through a participatory process involving the body's main stakeholders and, in particular, the country offices. Where necessary, evaluations and reviews may also be carried out in collaboration with external actors, specialized on the topic or mirroring VIS.

*This procedure has been translated into English from the original Italian only for the convenience of international readers. In the event of a different interpretation or interpretation dispute, the original Italian procedure shall prevail.*



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