This Policy complements and forms part of the CIES compliance system, in particular the Codes of Conduct already in use (Code of Ethics[1] and Child Protection Policy[2]), adopted in line with our values and adapted to our organisation[3] and to be considered as annexes to this procedure.
The Policy (hereafter also PSEA) declares our policy of **Zero Tolerance** towards all forms of sexual abuse and exploitation by all persons working in or with, humanitarian or development organisations within the United Nations (SEA).

PSEA:

- establishes rules and requirements to ensure the good conduct of staff and associated personnel, as well as tools to report any behaviour that violates our values or to report a person in need of support. It also aims to prevent sexual exploitation and abuse and to take corrective actions if events and incidents related to it occur;
- it applies exclusively to the protection and case management of CIES staff and associated personnel, beneficiaries and community members who are adults or younger than 18 years of age who are recipients of our interventions, as a complement to the CIES Child Protection Policy;
- it wants to ensure that the roles, responsibilities and standards of conduct expected in relation to SEA are clear and known inside and outside CIES Onlus, in order to promote a safe environment against all forms of sexual abuse and exploitation,

Addressees of the PSEA Policy: Board members, staff and associated personnel (advisors, volunteers, partners) in Italy and abroad representing CIES Onlus.

[1] https://www.cies.it/wp-content/uploads/2018/12/Codice-Etico-CIES_ONLUS_DEF_7.12.2018.pdf

[2] https://www.cies.it/wp-content/uploads/2024/03/POLICY-DI-PROTEZIONE-MINORI-E-ADOLESCENTI.pdf

[3] See below in PSEA Framework

Policy Statement

CIES has a Zero Tolerance policy towards sexual abuse and exploitation, which violates universally recognised international legal and regulatory norms and standards and constitutes unacceptable and prohibited behaviour for all those who, in any capacity, collaborate on behalf of CIES Onlus and/or are involved in our activities.

Everyone is expected to respect conduct, personal and professional standards set out here and to aid and support in respecting and promoting the rights of the beneficiaries of our activities, particularly the vulnerable.

CIES is fully committed to a preventive approach based on the protection of universal rights, non-discriminatory and culturally appropriate and victim-centred when allegations of sexual abuse and exploitation occur

Scope of application

The policy and its obligations bind the Board of Directors, all CIES Onlus staff and associated personnel, regardless of the contractual relationship. It applies to all activities and services performed by CIES, to all projects, whether funded or not, to any partners with whom we collaborate, to all contexts related to or arising from work, inside or outside that environment, during or outside working hours.

Definitions

Sexual exploitation: any actual, attempted or threatened abuse of a position of vulnerability, differential power or trust, for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual abuse: actual, attempted or threatened physical intrusion of a sexual nature by force and/or under coercive and/or inequitable conditions. This includes online and non-contact sexual abuse.

Sexual Exploitation and Abuse (SEA): any actual or attempted or threatened abuse of a position of vulnerability, differential power or trust, for sexual purposes and actual, attempted or threatened physical intrusion of a sexual nature, by force and/or under coercive or inequitable conditions, by any person working in, or with, humanitarian or development organisations within the United Nations.

Survivor/victim means a person who is, or has been, exploited, sexually abused. The term 'survivor' implies strength, resilience and the ability to survive. The term 'victim' denotes one who has been subjected to actions by the alleged perpetrator.

CIES commitment to PSEA

CIES Onlus will make every effort to create and maintain a safe environment and take appropriate measures in the contexts and communities in which it operates, through a robust PSEA framework, which includes preventive measures and appropriate responses when SEA incidents or situations are reported. This confirms CIES Onlus' commitment to the *Bulletin on Special Measures for protection from sexual exploitation and sexual abuse* (ST/SGB/2003/13) and to achieving full implementation of the IASC Six Core Principles[4] concerning SEA.

Standards of conduct

All CIES management staff, Board of Directors and associate partners must recognise that sexual exploitation and abuse constitute serious conducts and are grounds for disciplinary action, including termination of employment and/or partnership. Further the IASC Core Principles on Sexual Exploitation and Sexual Abuse, the CIES Ethical Principles of Conduct described in our compliances are binding and must be adhered to.

Below are the principles of ethics and conduct inherent in this Policy:

1 - Sexual exploitation and abuse by CIES staff, Board members and associated personnel are considered as acts of serious misconduct and are grounds for dismissal and removal from employment. Please also refer to the CIES Onlus Code of Ethics.

2 - Sexual activity with children (persons under the age of 18) is forbidden and prohibited, regardless of the locally recognised age of consent. The mistaken belief in the age of the child does not constitute a defence. Please also refer to the CIES Onlus' Child Protection Policy

3 - Behaviour aimed at promising money, work, goods or services, in exchange for sexual services and favours and other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes the exchange for forms of assistance or service towards the beneficiaries of our activities.

4 - Any sexual relationship between CIES staff and associated personnel and the beneficiaries of assistance or services of our activities -or other vulnerable members of the communities- within the contexts in which we operate, and which implies an improper use of their work and/or personal status is prohibited. These reports severely undermine the credibility and integrity of CIES and all personnel working in the humanitarian and development fields.

5 - If Board members, CIES staff and associated personnel develop concerns or suspicions of sexual abuse or exploitation by a colleague, whether from the same organisation or from other

[4] IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019 | IASC (interagencystandingcommittee.org)

organisations with which they work or come into contact, they must report such concerns through the reporting mechanisms established within this Procedure.

6 - Board members, CIES staff and associated personnel are expected to create and maintain an environment that prevents SEA and promotes the implementation of the policy described in this Procedure. In particular, the Board of Directors and all management and apical roles have the responsibility to support and develop systems that keep this policy of prevention, respect and protection constant and active towards all persons and beneficiaries of our activities.

PSEA Framework

CIES includes these procedures within its Management System, adapting it to the active processes both within the Quality System (ISO 9001:2015) and the compliance which has been implemented over the years.

The PSEA is part of the compliance that the Board of Directors, staff and associated collaborators, as well as CIES partners, must undertake to follow and apply is the minimum expected behaviour in carrying out their work and towards the beneficiaries of our activities.

PSEA is aligned with the following policies and procedures:

- Code of Ethics
- Child Protection Policy
- Personal data processing information
- Management and Monitoring Procedures
- Designing Procedures
- Service Provision Procedures
- Procedures for selecting, updating and training staff, trainees/interns and volunteers
- Organisation, Management and Control Model (pursuant to Legislative Decree 231/2001)

Staff Selection

Staff selection is carried out based on the specified procedures and adherence to the CIES compliance system, including those relating to SEA, which are signed together with the employment contract.

Partnership Agreements

CIES includes specific standard clauses relating to its compliance in partnership agreements. These clauses states adherence to the ethical values of CIES and awareness of the procedures CIES has implemented. Partners/partnerships are asked to commit to a zero-tolerance policy towards SEA and take measures to prevent and possibly address such situations. Where partners do not have adequate policies and measures in place, CIES will support them in developing and adopting

measures that are deemed relevant. Failure of the partnerships to take preventive measures against SEA to investigate allegations or take corrective action will constitute grounds for termination of the agreements.

Staff awareness, training and updating courses

CIES Onlus is committed to ensuring that its management staff and associated collaborators are aware of the system envisaged by PSEA and the obligations and actions to be taken in the event of an allegation. Each collaborator will receive, to be signed together with the contract, these procedures and the SEA Code of Conduct (see Annex PSEA-1). For a description of the obligations, please see **Basic Principles** and further on **Verification and Control System** and **Roles and Responsibilities PSEA/Focal point**

CIES management staff are trained during the contract start-up phase and attend an updating training on CIES compliance, including PSEA, at least once a year, depending on the issues and updates needed. Training/upgrading takes place in presence or online, as required.

A starting training for new staff members is mainly carried out online if the new collaborator's starting timeframe does not coincide with the general staff updating schedule and, in such a case, it takes place through the sending of standard forms followed by verbal feedback with the Responsible of the department in which the human resource is placed, who must report the result to the Quality System Manager for tracking.

CIES, if necessary, develops different training plans depending on the participants.

Complying with its Quality Management System, it tracks all information related to annual training/updating, according to the tools in use.

The possibility of exchange and discussion is always ensured within the training/updating: the assessment of the interventions is carried out in plenary by the experts and the Quality System Manager at the end of the training and updating interventions.

PSEA/Focal Point Roles and Responsibilities

The PSEA policy is led and promoted by the CIES Board of Directors, consistent with its ethical values and compliance. The Board of Directors ensures the continuity of the PSEA policy in economic terms and the sustainability of this organisational culture. The Board of Directors appoints a PSEA Focal Point within the organisation.

The CIES' Board of Directors is responsible for the review of reports and complaints and the entire process resulting from them. It receives reports from the PSEA Focal Point, who is also routinely responsible for the promotion, control and field verification of procedures. The focal point in turn relies on other internal organisational figures in the CIES' sectors (see below Management Staff with a governance/coordination role) or who have a coordinating role in activities (Project Managers; Service Area Coordinators; Area Contacts; Administrative Tutors etc.).

Audit and Control System

Board of Directors:

- receives reports from PSEA Focal Points
- reviews requests and reports and defines and organises responses
- organises and manages investigations
- carries out an annual evaluation of the reports received and the actions taken in this respect together with the Quality Manager[5], also for the purpose of updating the annual schedule and risk analysis.

PSEA Focal point:

- receives and forwards reports/complaints to the Board of Directors
- reports concerns and problems in the implementation of PSEA
- leads, together with specific experts and the CIES Quality System Manager, information, training and updating courses for management staff and associated collaborators
- coordinates and liaises with other counterpart bodies that promote PSEA policy at various levels
- ensures that complaints mechanisms are respected, understood and communicated

Management staff with a governance/coordination role (Project Managers; Service Area Coordinators; Area Contacts; Administrative Tutors etc.) according to their specific roles:

- leads operational field screening of PSEA procedures
- ensures that all associated collaborators, external to the organisation, have signed and understood the PSEA Code of Conduct and that the clauses relating to CIES policies, including PSEA, are signed at the start of any collaboration, whether working or voluntary
- supports communication with staff in the investigation phases
- archives and stores associated personnel documents related to PSEA (e.g. signed Codes of Conduct).

The management staff (without coordination/management role) and all associated staff:

- must comply with the code of conduct and the PSEA
- must take part to training/updating courses and awareness-raising activities required for the dissemination of the PSEA
- reports through the designated reporting channels and participate in any investigations.

It is the obligation of management and associated staff to report any suspicions, concerns or allegations to the PSEA Focal Point. The consequences of an actual and documented failure to report are:

- termination of employment contracts for management staff and associated employees;
- termination of partnership agreements.

[5] In the CIES Onlus organisation chart, the Quality Manager has a managerial role with specific delegation concerning the management, coordination and supervision of the Quality System (see CIES Onlus Social Report)

For any other and further civil or criminal litigation attributable to individuals, persons and entities, please refer to the competent Courts and to the CIES procedures already in place. In any case, CIES will cooperate in the investigation resulting from the reports to protect and safeguard the victims.

Accessibility and Transparency
CIES Onlus provides training on the relevant modalities and procedures for reporting.

WHO CAN REPORT:
Anyone working within the Organisation, or collaborating with it, in any capacity whatsoever, has an obligation to report suspicions of abuse or exploitation, the alleged perpetrator of which is a member of the management staff and associated collaborators, whether they are specific reports or unconfirmed suspicions. The priority is always and in all cases the protection of the victim. The CIES Onlus Procedure gives staff the opportunity to report abuse even when the alleged perpetrator is outside the organisation. All reports must be made immediately and in any case within 24 hours, unless it is impossible or unfeasible to do so due to exceptional circumstances.

WHAT TO REPORT:
any suspicion of personally harmful behaviour, any concern for the person's safety, any breach of the CIES Onlus Code of Conduct can be reported.

HOW TO REPORT:
a report can be made by means of a written report or document, a phone call, an e-mail, an interview, a letter and any other valid method. The choice to consider valid any means was made in order to ensure that everyone is able to report.
An appropriate Form can be used (Annex PSEA-2 Reporting Form).

WHO TO REPORT TO:
Reports should reach the CIES Focal Point at the following contacts:
Giuseppe Giordani
Marta Bernardini
Phone: +39 06 77264639-26
Email: focalpointPSEA@cies.it
By mail addressed to the Focal Point PSEA of CIES Onlus, Via Merulana 198, 00185 - Rome
If the report concerns a member of the Board of Directors, the reporting party shall specify it along with the report/complaint so as to activate a specific alternative channel (see below in **Reporting and Mechanism Following the Report)**

Safety and Confidentiality

CIES has established a secure and confidential environment and accessible reporting mechanisms for the recipients of these policies, for both management and associated staff and the population that is a victim or potential victim of SEA.

CIES will not tolerate any kind of retaliation or threat against anyone who reports a SEA situation or cooperates in any investigation process related to a SEA complaint.

CIES is committed to upholding a culture of transparency and a safe environment in which management staff, associated collaborators and beneficiaries can report allegations to SEA immediately without any adverse or punitive action being taken against them.

CIES has mechanisms in place to restrict access to information and store written reports securely for the safety of the survivor and the complainant. Information about an allegation will only be shared on a need-to-know basis for the purpose of investigation or to provide assistance to victims.

Reporting and reporting follow-up mechanism

The PSEA Focal Point receives reports via the indicated channels. A Reporting Form is available (Annex PSEA-2 Reporting Form).

The reporting party sends the report to the Quality System Manager, who enters it in a specific register (PSEA-3 Report Register and Investigation Form) accessible only to the Board of Directors. Case studies are carried out, through the relationship with the reporter. The decision on processing and intervention is always decided by the Board of Directors unless there are clear and specific conflicts of interest with any of its members[6]. The decision on processing and intervention is tracked on the same Register. The case is followed until it is considered concluded, and the conclusion drawn.

The Quality System Manager is obliged to check and analyse the register annually together with the Board of Directors. The resulting assessments, where appropriate, are incorporated into the CIES Onlus risk analysis, a document aimed at verifying, improving and addressing management policy. Consequently, improvements and revisions may be included in annual schedules, specifically in relation to the goals to be achieved for CIES ethical compliance, including this Policy.

[6] In this case the report, which must contain this specific information provided by the reporting party (see WHO TO CONTACT), is forwarded directly to the CIES Onlus Quality System Manager and dealt urgently through an alternative channel that involves all the other members of the Board of Directors (for reports: email qualita@cies.it; 06-77264662; by post addressed to the CIES Onlus Quality System Manager, Via Merulana 198, 00185 - Rome)

Ad hoc verification tools may be envisaged for certain intervention recipients and/or for situations/contexts considered to be at risk or within critical situations that need to be further investigated.

Investigations

CIES Onlus undertakes to investigate SEA allegations and to properly and promptly investigate into any allegations made against the recipients of these procedures.

CIES undertakes to report to the competent bodies if the perpetrator was from another body/institution.

Procedures for the management of investigations may provide for appointed external personnel. All persons involved in various capacities in the investigation activities will be required to sign a Confidentiality Pact.

Information on the investigation and its results will be tracked in the Report Register (PSEA-3 Report Register and Investigation Form) until the case is closed and followed up.

If, after the investigation, there is evidence to support SEA's allegations, the cases will be referred to the competent authorities for appropriate action, including criminal proceedings (see also under Audit and Control System). Before any referral to the competent authorities, the victim's consent will be required and tracked.

The Board of Directors is responsible for the investigation of SEA's allegations. The main goal of the investigation is to gather information that will confirm or deny the allegation. The Board of Directors decides, plans and organises investigations unless there is a clear conflict of interest (see WHO TO REPORT TO and Reporting and reporting follow-up mechanism). It will also make recommendations for improvement so that CIES will be able to reduce the risk of any misconduct.

The CIES Onlus' Board of Directors is responsible for the implementation of the recommendations and all changes made and that will be communicated to PSEA recipients.

Assistance to SEA survivors/victims

CIES Onlus is committed to ensuring that possible victims of SEA have access to the necessary assistance and support, regardless the decision on the conduct of the investigation, the outcome of the investigation and the cooperation of the victim. Assistance and support will be provided by qualified and competent services that have a victim-centred approach and fully respect the victim's rights and interests.

Annexes:
PSEA Code of Conduct - CIES Onlus (Annex PSEA-1)
Reporting form (Annex PSEA-2)

Other documents:
Report Register and Investigation Form (PSEA-3)
Reporting diagram and PSEA survey procedure - CIES Onlus (PSEA - 4)
Self-declaration format CIES Onlus - PSEA
List of services CIES Onlus - PSEA
Confidentiality pact - CIES Onlus PSEA
Format References - CIES Onlus PSEA
Organisational Management - CIES Onlus PSEA

CODE OF CONDUCT
PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (SEA)
ANNEX PSEA-1

CIES Onlus has ZERO TOLERANCE FOR ALL FORMS OF SEXUAL EXPLOITATION AND ABUSE

Sexual exploitation and abuse (SEA) of all beneficiaries of our activities, whether adults and/or children[7], is prohibited and unacceptable and considered a very serious violation. This Code of Conduct is to be considered an integral part of our Child Protection Policy and Code of Ethics[8]

Such acts violate human rights and seriously damage the credibility of CIES Onlus and all humanitarian and development organisations. They also undermine our ability to act. CIES Onlus has measures in place to prevent and respond to sexual exploitation and abuse by its Board, staff and associated personnel.

I, the undersigned, understand and acknowledge that it is strictly forbidden:

1. Hitting, physically assaulting or physically or psychologically abusing a beneficiary;
2. Using foul, vulgar, offensive language with beneficiaries, giving inappropriate, offensive or abusive suggestions or advice;
3. Having attitudes towards the beneficiaries that, also from a psychological point of view, may negatively affect their identity and socio-relational development;
4. Having relations with beneficiaries that could be considered exploitative and/or abusive, even in implicit or merely suggestive forms;
5. An improper use of one's authority or position, work or personal, to obtain sexual favours;
6. Engaging in sexual activity (of any kind, including in purely virtual or suggestive forms) or having sexual relations with individuals under the age of 18 (i.e., with persons of legal age who are not consenting and capable of expressing full consent), regardless of the definition of the legal age or the methods of consent legally recognised in different countries. A mistaken belief in the age of a child is not an acceptable defence;
7. Accepting, giving or exchanging money, labour, goods, assistance or services in exchange for sexual benefits or favours, or other similar forms of humiliating, degrading or exploitative behaviour, and this includes exchange for assistance due to the recipients;

[7] This means all the recipients of the activities, projects and services promoted by CIES, in Italy and abroad
[8] Available at www.cies.it, Transparency section

8. Denying protection, assistance or services to beneficiaries, or granting favourable treatment in order to solicit sexual favours, gifts, payments of any kind or any other benefit;
9. Engaging in sexual activities with prostitutes, regardless of the country's legislation;
10. Acting in a manner that may be inappropriate, harmful or abusive or that may put the beneficiaries at risk of exploitation, mistreatment or abuse, including work of another nature involving exploitation, or even simple degradation of image, including begging or sexual solicitation even in merely suggestive forms;
11. Behaving in an inappropriate or sexually provocative manner;
12. Directly or indirectly producing, distributing, disseminating or advertising by any means, including telematically, pornographic and child pornographic material, implicit or explicit, even if only virtual;
13. Establishing or maintaining contact with the beneficiaries of the activities other than for objectives related to the activities themselves, using personal communication tools (e-mail, chat, social networks, etc.);
14. Allowing one or more of the beneficiaries you work for to sleep in your house;
15. Sleeping in the same room or bed with the beneficiaries you work for;
16. Tolerating or participating in conduct with beneficiaries that is illegal or offensive or that jeopardise their safety;
17. Intentionally making false allegations of violations of this Code of Conduct against another worker and/or spreading false statements about colleagues or staff of other organisations or entities.

Furthermore, I commit myself to:

18. Treat all people with fairness and respect, courtesy and dignity, in accordance with international human rights law and according to the standard of behaviour set out in the PSEA and all other CIES Onlus policies;
19. Provide assistance to beneficiaries/populations affected by SEA and ensure safety, dignity and effective access to the services provided;
20. Manage and organise the work environment in such a way as to minimise risks as much as possible;
21. Maintain a high personal and professional profile;
22. Immediately report any allegations of sexual abuse and exploitation of beneficiaries of activities and report any news of reasonable suspicion/doubt about possible abuse or exploitation of a beneficiary, activating the procedures provided for in the Act and this Policy;
23. Be vigilant in identifying situations that may entail dangers or harm to the beneficiaries, anticipating and handling them in the forms and ways allowed by the Law and this Policy;

24. Help creating and maintaining an environment that prevents sexual exploitation and abuse and promotes the implementation of this Code of Conduct;
25. Ensure the dissemination and maintenance of a culture of openness that allows beneficiaries and their carers to easily raise and discuss all kinds of issues and concerns;
26. Promote a sense of responsibility for one's actions among CIES colleagues and others with whom one comes into contact, so that inappropriate actions and behaviour, or behaviour that may generate abuse and exploitation, neither go unnoticed nor be tolerated;
27. Tell beneficiaries what kind of relationship they should expect to have with staff or representatives and encourage them to report any concerns;
28. Enhance the skills and knowledges of the beneficiaries and discuss with them their rights, what is acceptable and what is not, what they can do if any problem arises;
29. Promote the participation of beneficiaries so as to also develop their capacity for self-defence.

Reporting Form (Annex PSEA-2)

Details of the reporting party:

Name:

Surname:

Contacts:

Information on facts/events

Type of report (abuse-exploitation):

Victim (name and surname and/or other useful details):

Male/Female/Fluid:

Alleged offence/conduct (description):

Brief description of the event:

Date/period in which the event took place:

Physical place where the event occurred:

Ways in which the event became known:

Author(s) of the event (name and surname):

Other parties present/involved, if any:

Any other persons aware of the event who can report/witness:

Evidence and attached documents supporting the report:

Personal interests of the reporting party: declare any personal interests in relation to the reported person or the reported matter

I am aware of the responsibilities and civil and criminal consequences provided for in the event of false declarations and/or the formation or use of false documents, also pursuant to Presidential Decree no. 445 of 28 December 2000

Faithfully,

Signature

Date