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GUIDELINES


AVSI POLICY ON PREVENTION FROM SEXUAL EXPLOITATION AND ABUSE AND SEXUAL HARASSMENT PSEAH

| Version | Date | Drafted by | Checked by | Approved by |
|---------|------------|---------------|----------------|--------------------|
| 1 | 20/11/2023 | Maya Rechdane | Lucia Castelli | Board of Directors |

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1. POLICY RATIONALE

In its vision and mission, AVSI recognizes the person as a resource, never defined by the circumstances in which s/he lives, having value and dignity.

Approaching each and every person, a child and an adult, in this way means putting the person's safeguarding at utmost importance, recognizing his/her rights to be protected from sexual exploitations and abuse (SEA) and from sexual harassment (SH).

A safeguarding approach becomes the minimum standard required from every AVSI employee and associated personnel in his/her relationship with each and every beneficiary and in his/her relationship with any other employee and any associated personnel.

Creating a safeguarding culture in an organization is a long-term goal, especially within an organization operating in numerous countries, in different contexts and culture. For this purpose, AVSI commits:

- to align all its policies so that a comprehensive understanding is possible for every AVSI employee and associated personnel
- to learn from all SEA incidents in order to strengthen all program cycle activities regarding PSEAH
- to work with implementing partners on the adoption of this safeguarding culture
- to revise this policy every THREE years.

2. SCOPE AND REFERENCES

AVSI's policy on prevention from sexual exploitation and abuse and sexual harassment has the following objectives:

- To affirm AVSI's zero tolerance for violence in general and Sexual Exploitation and Abuse and Sexual Harassment (hereinafter "SEAH") towards beneficiaries and community members specifically, as well as between AVSI's employees and associated personnel;
- To provide clear guidance on the code of conduct related to SEAH expected from AVSI employees and associated personnel and the obligation of reporting for any suspicion;
- To demonstrate AVSI's commitment to preventing, reporting and responding to SEAH by the statement of appropriate measures.

For safeguarding, the PSEAH policy is one of the policies that AVSI employees and associated personnel are committed to following and enforcing at all levels; it is therefore aligned and complements AVSI's safeguarding duties towards all beneficiaries and between employees with the following reference documents:

Code of Ethics

Organizational, Management and Control Model (pursuant to Italian Legislative Decree 231/2001)

DIGE 3/2020 Child Safeguarding Policy

GP-DHRG-30 Whistleblowing Policy

DIGE 11/2020 Accountability Policy towards affected population

DIGE 12/2020 Recruitment

GP-DERM-11 Enterprise Risk Management

GL-DAMP-03 Data Protection Policy

GL-DSSA-01 Safety and Security Guidelines

GP-DSSA-12 Safety and Security Procedures

These policies provide AVSI employees and associated personnel with the expected minimum standard of conduct with beneficiaries and among the staff.

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3. POLICY FIELD OF APPLICATION

The PSEAH Policy sets out AVSI's approach to prevent and respond to Sexual Exploitation and Abuse and Sexual Harassment. This policy and its obligations bind all AVSI employees and all AVSI associated personnel irrespective of their contractual relationship, regardless of status, payment, or length of contract. By AVSI associated personnel, AVSI means any person performing a task on behalf of AVSI, namely interns, volunteers, consultants, contractors, researchers, photographers, journalists, visitors, partners, donors, sponsors, and any person representing AVSI.

This policy applies to all these people in all contexts linked with or arising out of work, both inside and outside the work environment, during and outside of working hours.

4. POLICY GUIDING PRINCIPLES

The guiding principles for this policy are:

1. **Zero tolerance** for Sexual Exploitation and Abuse (SEA) perpetrated against beneficiary or community member and Sexual Harassment (SH) perpetrated against AVSI employee or associated personnel.
2. **Accountability to Affected People** (AAP) who are given the power of assessing the conduct and performance of AVSI employee and associated personnel by reporting cases of sexual exploitation and abuse and other sensitive matters¹. Indeed, Sexual Exploitation and Abuse (SEA) constitutes the most egregious breach of Accountability to Affected Populations (AAP)².
3. **Survivor centered approach** for the victim/survivor of Sexual exploitation and abuse (SEA) & Sexual harassment (SH), treated with dignity and respect, without any discrimination, being involved actively in decision making, respecting his/her right to choose, provided with comprehensive information, having his/her privacy and confidentiality protected³ and his/her safety as a primary consideration.
4. **Shared responsibility** refers to the recognition that multiple individuals, departments, and levels of an organization, as well as external partners and stakeholders, all have a role to play in preventing and responding to incidents of sexual exploitation and abuse and sexual harassment. It emphasizes that addressing and preventing sexual exploitation and abuse and sexual harassment is not the responsibility of one group or individual alone but requires a coordinated effort among all relevant parties.
5. **Confidentiality** of complainants, survivors, and other relevant parties will always be respected. All SEAH related information will be kept confidential, identities will be protected, and the personal information of survivors will be collected and shared only with the informed consent of the person concerned. Disclosure of information will be on a strict need-to-know basis.

5. POLICY MAIN DEFINITIONS

For the present policy, the following definitions will be adopted, in line with the UN Secretary-General's Bulletin and subsequent UN guidance⁴: **Report of possible misconduct**: Information provided, by any person (source), indicating conduct that may be in breach of the PSEAH Standards of Conduct or any other Standard of Conducts related to other AVSI's policies.

¹ Adapted from IASC COLLECTIVE AAP FRAMEWORK, DRAFT – Last updated 19.04.2021, available at: <https://interagencystandingcommittee.org/system/files/2021-05/DRAFT-%20Collective%20AAP%20Framework%20-%20INTRODUCTION%2C%20April%202021.pdf>

² The IASC AAP/PSEA Task Team, results of collaborative actions / linkages between AAP and PSEA, available at: [PowerPoint Presentation \(interagencystandingcommittee.org\)](#)

³ Adapted from the INTER-AGENCY MINIMUM STANDARDS for Gender-Based Violence in Emergencies Programming, 2019 p.5, available at: <https://gbvaor.net/gbvitems>; as a reference on the Key standards for applying this survivor-centered approach: Protection from Sexual Exploitation and Abuse (PSEA): A Practical Guide and Toolkit for UNICEF and Partners, April 2020, available at: [Tool 10.1 PSEA Practical Guide and Toolkit \(unicef.org\)](#)

⁴ Adapted from United Nations (2017): Glossary on Sexual Exploitation and Abuse: Thematic Glossary of current terminology related to Sexual Exploitation and Abuse (SEA) in the context of the United Nations, available at: <http://pseataskforce.org/uploads/tools/1501161761.pdf>, no.51

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Sexual abuse: The actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions. This includes non-contact and online sexual abuse (like unwanted and/or uninvited exposure to pornography, texts, images, demands for sexualized photographs, etc.) All sexual activity with a child is considered as sexual abuse.

Sexual exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual exploitation is a broad term, which includes a number of acts as “transactional sex”, “solicitation of transactional sex” and “exploitative relationship”.

Under this policy, the definition of sexual exploitation and sexual abuse apply whenever the inappropriate conduct is committed by AVSI employees or any related personnel against those receiving services or assistance and other members of local communities.

Sexual harassment: Under this policy, sexual harassment is a sexual abuse that occurs between personnel/staff, involves any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another colleague, and when such conduct interferes with work, by creating an intimidating, hostile or offensive work environment.

Beneficiaries: All people who receive services and assistance from AVSI.

Gender Based-Violence: An umbrella term for violence directed toward or disproportionately affecting someone because of their actual or perceived gender identity. The term ‘gender-based violence’ is primarily used to underscore the fact that structural, gender-based power differentials around the world place women and girls at risk for multiple forms of violence. This includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty, whether occurring in public or in private life. While women and girls suffer disproportionately from GBV, men and boys can also be targeted. The term is also used by some actors to describe targeted violence against lesbian, gay, bisexual, transgender, and intersex (LGBTQIA2S+) populations, in these cases when referencing violence related to norms of masculinity/femininity and/or gender norms.


Survivor/victim refers to a person who is, or has been, sexually exploited or abused or harassed. The term “survivor” implicates strength, resilience and capacity to survive. The term “victim” indicates a victim of actions by an alleged perpetrator. This does not, however, deny the person’s dignity and capacity to act as an individual.

6. POLICY STANDARDS OF CONDUCT

AVSI adopts, in this policy, mainly the IASC Six Core Principles relating to Sexual Exploitation and Abuse⁵, which constitutes rules on sexual conduct for all AVSI employees and any related personnel at all times, during and outside of working hours, in their personal and professional lives.

All AVSI employees and associated personnel need to acknowledge that Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) constitute serious misconducts therefore grounds for disciplinary measures, including summary dismissal.

⁵ From the IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019, available at: <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2019>

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In addition to IASC Core principles relating to Sexual Exploitation and Abuse, AVSI ethical principles of conduct described in the Code of Ethics are binding and must be met by all staff members. Here below the ethical principles of conduct concerning this policy:

1. Sexual exploitation and abuse and Sexual Harassment by AVSI employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between an AVSI employee or associated personnel and a person benefitting from AVSI's assistance and services that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of AVSI as an organization.
5. Where an AVSI employee or any associated personnel develops concerns or suspicions regarding sexual exploitation and abuse or sexual harassment by a fellow worker, he or she has the obligation to report such concern via AVSI's established reporting mechanisms. The obligation to report applies even when the misconduct is perpetrated by an employee working with a different organization.
6. AVSI employees and associated personnel are obliged to create and maintain an environment which prevents any form of violence including child safeguarding violation, sexual exploitation and abuse and sexual harassment. They need to treat all colleagues with courtesy and respect, be aware of how their own behavior may be perceived, and take action where appropriate. Every AVSI employee and associated personnel shall promote the implementation of the code of conduct. Managers at all levels have a particular responsibility to support and develop systems which ensure the complete respect of this code.

7. DEFINITION OF RESPONSIBILITIES

To be effective, the PSEAH policy defines the responsibilities among AVSI employees and associated personnel in regard to AVSI's commitment to zero-tolerance for Sexual Exploitation and Abuse, Sexual Harassment as following:

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| AVSI employees and associated personnel | AVSI employees and associated personnel are required to adhere to this policy at all times. They are obliged to report any suspicions, concerns or knowledge of Sexual Exploitation and Abuse and Sexual Harassment by fellow coworkers through the designated reporting channel (section 8.2). All employees and related personnel must acknowledge having read and understood the policy, by signing it, (Annex 1-GL05) All AVSI employees and related personnel are required to participate in SEAH mandatory training and awareness-raising efforts supporting the dissemination of PSEA materials among beneficiaries. They are responsible to identify and mitigate / avoid SEAH risks related to the implemented activities in the projects. If appropriate and when required, they are asked to participate in investigations of SEAH allegations. |
| Managers | All AVSI Managers (programs, operations and focal points) have a responsibility to lead by example, demonstrating zero-tolerance for sexual exploitation and abuse (SEA) and sexual harassment (SH) through consistent and sustained leadership. They must ensure that all AVSI employees and related personnel are aware of their obligations under this Policy. |
| The child protection and girls & women | The child protection and girls & women empowerment Unit (DPRW) has the responsibility to help the Country Representative and the Human Resource Department in identifying the Safeguarding Focal Points, training them, following-up |

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| empowerment Unit (DPRW) | on their work regarding the PSEAH and the Child Safeguarding Policy and coaching them to reach their responsibilities and duties. |
| HR Department (DHRG) | The HR department at HQ level and in AVSI country offices will be in charge of all measures and procedures detailed in section 8.1.1. The HR department will liaise with the Security Officer appointed in each AVSI office along with the Safeguarding Focal Point(s) to ensure all employees report any fact related to a harassment risk experienced by any employee or associated personnel |
| Safeguarding Focal Point | The Safeguarding Focal Point is one or more appointed person in each country. He/she is responsible for putting in place, all preventive measures related to AVSI workforce in country with strong relations with the HR department and the DPRW Unit. He/she will conduct training and awareness-raising of personnel and others on PSEAH, receive reports of SEA allegations and coordinate the response regarding the assistance and referral, report concerns or issues to the Whistleblowing Committee and coordinate with other relevant actors on PSEA (Safeguarding Focal Point Job Description in Annex 2-GL05). |
| Communication Department (DCOG) | The communication department will support the DPRW Unit and the Safeguarding Focal points in developing communication materials related to PSEAH and Child Safeguarding violations, relevant to age, language and capacity. Special attention will be made to tools addressed to children and in line with AVSI's Child Safeguarding Policy. |
| MEAL Department at country level | The MEAL Department is responsible for putting into place the Feedback and Complaint Mechanism (FCM) allowing beneficiaries to be active protagonists in project and activities implementation. Since PSEAH can lead to sensitive complaints that can be received by the FCM, a tight collaboration between the MEAL department and the Safeguarding Focal Point is required. |
| Whistleblowing Committee | This Whistleblowing Committee, following the Whistleblowing Policy, is entrusted with the management of whistleblowing channels and thus with the reception, investigation and management of reports. |

8. POLICY FRAMEWORK

Effective PSEAH requires an organization-wide approach. For this purpose, different organizational areas of the organization will be involved to take the appropriate measures at all stages, including prevention, reporting and response. This framework is meant to be endorsed by AVSI at HQ level and in each country in which AVSI is operating.

8.1 At prevention level

8.1.1 Measures related to AVSI Personnel

AVSI personnel needs to fully endorse AVSI's commitment to zero tolerance for sexual exploitation and abuse, and sexual harassment. For this purpose, the HR department will endorse the below measures ensuring prevention of SEAH at every stage of the employee life cycle within AVSI.

At recruitment level

A key measure of the recruitment process is AVSI adherence to the Inter-Agency Misconduct Scheme (MDS).

- During the interview, questions related to PSEAH are asked and, after the second interview, for candidates in the short list a verification of references from previous assignments is carried out following the "Reference check" model. Besides, a self-certification of pending charges or regarding sexual exploitation and abuse is signed by the candidate (Annex 3-GL05).
- Criminal record check is conducted, where possible.
- Being a signatory to the Inter-Agency Misconduct Scheme, AVSI HR department will check with previous employers on SEAH issues related to short listed candidates to cover a period of at least the five years preceding the request (refer to the NORMA DIGE 12/2020 Recruitment).

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- New employees are handed a copy of this policy, the Code of Ethics, the Child Safeguarding Policy and all policies in force and sign the contract with a clause of declaration of having read them and engaging himself/herself. These documents will be kept in each employee's file within the HR department.

At onboarding and retention level

The CHILD PROTECTION AND GIRLS AND WOMEN EMPOWERMENT UNIT (DPRW) in AVSI HQ in collaboration with the HR department are responsible for designing all below activities:

- a briefing on PSEAH within the Orientation training for all newly recruited staff
- a mandatory training on PSEAH policy for all newly recruited staff
- an annual refresher training session for all staff

The Unit will train the Safeguarding Focal Points in each AVSI implementing country on these training packages; the Safeguarding Focal points at country level, within an agreed training plan, will implement it with all staff.

An attendance list for these training courses is completed on Dynamics (an online tracking system) and employee attendance needs to be recorded in its own file.

At performance appraisal level

Compliance with the PSEAH policy is part of the performance appraisal of each AVSI staff.

The HR department is responsible to ensure that the goal setting done by each staff includes adherence to all AVSI procedures and policies.

8.1.2 Measures related to AVSI safe programming


Designing safe programs within any sector of work and projects is necessary. The first responsibility lies with the team tasked with writing proposals; in this regard, during the design phase, it is crucial to include SEA risk assessment that will build on the Enterprise Risk Management process (performed via self-assessment on a yearly basis during the third quarter).

In addition to the definition of responsibilities (chapter 7), during the implementation phase, the management team (and especially the project managers) will ensure the implementation of the below, while adjusting the actions if not completely foreseen during the writing phase.

- In coordination with the HR department, verify that all project staff has received training or refresher on PSEAH.
- Consider project plans that will include activities on PSEAH awareness and sensitivity for beneficiary/community members, including the timely elaboration of material in this regard.
- Whenever possible, including in the project budget funding lines for capacity building, communications and implementation related to PSEAH (hotlines, Feedback and Complaint mechanism, HR related costs etc.).
- Introducing progressively within the monitoring framework at least two indicators related to PSEA: one related to prevention (i.e.: Number of beneficiaries reached through awareness activities on PSEA) and one for response (i.e.: Number of complaints related to SEA that are reported to the Whistleblowing Committee and responded to within 7 days (disaggregated by age, sex and type of complaint).
- Whenever applicable, during the closure phase, document lessons learnt related to PSEAH and share it with the HR and the DPRW Unit.

8.1.3 Measures related to AVSI cooperative arrangement

AVSI is committed to zero tolerance for sexual exploitation and abuse and sexual harassment and is expecting all his collaborators to take this same commitment. For this reason, the clauses on PSEAH are included in all contract agreements. Potential partners and contractors will be assessed in their PSEAH capacity and training and capacity building delivered according to the needs.

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8.2 At reporting level

Reporting a SEAH allegation is a crucial step for ensuring AVSI's commitment to zero tolerance besides being an obligation. Failure by an AVSI employee or associated personnel to report constitutes a breach of this policy and may result in sanctions for misconduct.

Reporting channels must encourage safe and confidential reporting by personnel and affected populations. Any person who reports a SEAH suspicion, incident or concern *in good faith*⁶ will be protected from any retaliation.

Besides, any person who reports a SEAH suspicion, incident or concern will have his/her identity and personal data protected by AVSI WHISTLEBLOWING POLICY & AVSI DATA PROTECTION POLICY and related procedures. No exchange of personal information, including identifying data, will take place without the consent of the concerned person.

Channels for reporting SEAH allegations will be different according to the complainant profile:

- **Profile 1:** AVSI employee or associated personnel who witness a SEAH misconduct, has received a disclosure from the victim/survivor or from a community member.
The complaint in all these cases is an obligation and has to be made directly to the Whistleblowing Committee through the channels identified by the Whistleblowing Policy. Only in the case in which the Whistleblowing channels are not accessible, the country level Safeguarding Focal Point(s) will assist the whistleblower to lodge the complaint.
Once the complaint is received by the Whistleblowing Committee, on a strict need to know basis, information will be shared with the Safeguarding Focal Point in the country concerned, to help in the investigation.
- **Profile 2:** Beneficiaries and community members.
 - a. The complaint should be made through the channels provided by the Whistleblowing Policy.
 - b. Complaints may also be made through one or more channels identified at national level by the MEAL department in consultation with the community; channels can be either SEA-specific or integrated within the Feedback and Complaints Mechanism (FCM), when in place. The configuration and accessibility of these channels should prioritize inclusivity to the greatest extent possible. In this case the SEAH complaint will be directed exclusively to the Safeguarding Focal Point who is required to promptly transmit it to the Whistleblowing Committee via the established Whistleblowing channels.

Furthermore, AVSI Safeguarding Focal Point once he/she received an allegation related to Sexual Exploitation and Abuse (SEA) will ensure that the Country Representative report to donor in accordance with each donor specific reporting requirements.


8.3 At response level

Responding to SEAH is at two levels:

1. supporting the victim/survivor: assistance and referrals
2. conducting the investigation

It is important to note that the victim/survivor is entitled to assistance irrespective of whether the complaint proceeds to an investigation. Assistance will be ongoing regardless of the outcome of the investigation.

⁶ AVSI employees and related personnel are prohibited from presenting malicious and defamatory reports about Sexual Exploitation and Abuse and Sexual Harassment with the intention of harming another person's integrity or reputation. It should be noted that the false communication differs from reports submitted in good faith based on the provisions and information available at the time of preparation of the reports even if it is not substantiated by the investigation.

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8.3.1 Assistance and referral

The Safeguarding Focal Point(s) appointed in each AVSI country office is the person in charge of assisting the victim/survivor if consent is granted;

- When the complaint is received through the Whistleblowing Platform at HQ level, the Safeguarding Focal Point will receive by the Whistleblowing Committee the strictly needed information to support the victim/survivor;
- When the complaint is received through a country FCM channel, the Safeguarding Focal Point will be informed by the recipient of the complaint from the Accountability Unit.

Safeguarding Focal Point(s), trained on how to safely and confidentially refer GBV/SEAH cases for assistance, including those cases involving children, will provide assistance within 48 hours. It is their responsibility to contact the victim/survivor and receive his/her consent for assistance, to evaluate the needs and to refer to service(s) provider(s).

In the case that no service providers are available in the area to assist the victim/survivor, AVSI will assume responsibility for ensuring the necessary services through its internal resources.

The Safeguarding Focal Point(s) is/are the only person appointed to communicate with the victim/survivor regarding the assistance. Guidelines on complaint intake and victim assistance are part of the documentation given to each Safeguarding Focal Point to adequately perform his/her role.

8.3.2 Investigation Process

All complaints need to be reviewed and addressed, however not all will require a formal investigation process. The Whistleblowing Committee will determine if:


- The concern constitutes a potential breach of AVSI PSEAH policy
- There is an identified victim and Subject of Complaint
- Further information is required to determine either of the above

The Whistleblowing Committee will be in charge of investigating the complaint received. The primary objective of the investigation is to collect information that either substantiates or refutes the allegation.

The Whistleblowing Committee may request the assistance of the whistleblower, and/or other selected persons, including the Safeguarding Focal Point, in participating in the investigation. The Committee will systematically ask the persons participating in the investigation to sign, in advance, the Oath of Confidentiality for SEA Investigations (Annex 4-GL05). The committee will provide the complainant with a formal confirmation to convey that the allegation is being treated. In adherence to the principle of confidentiality, certain information may not be disclosed to the subject of complaint.

At the end of the investigation process, substantiated complaints will result in consistent disciplinary action; indeed, any AVSI staff having been found guilty related to SEA &/or SH will have to abide by disciplinary measures which can include termination of employment.

A flowchart with all the procedural points for starting an investigation and survivor assistance following a PSEAH complaint is in Annex 5-GL05. This document needs to be contextualized, in collaboration with HQ Safeguarding Focal Point, in each country.

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9. ANNEXES

Annex 1-GL05 Signatories to the AVSI PSEAH

Annex 2-GL05 Job Description Safeguarding Focal Point

Annex 3-GL05 Self-certification of pending charges SAS

Annex 4-GL05 Dichiarazione Riservatezza SEAHA

Annex 5-GL05 PSEAH Flowchart

This organizational guideline supersedes and replaces:

- *Norma DIGE 5/2018 PREVENTION SEXUAL EXPLOITATION ABUSE and HARRASSEMENT POLICY (PSEAH)*

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Annex 1-GL05

Signatories to the AVSI Policy on Prevention from Sexual Exploitation and Abuse and Sexual Harassment

(i) The AVSI Policy on Prevention from Sexual Exploitation and Abuse and Sexual Harassment, signed for and on behalf of AVSI Foundation:

Name: _____ Signature _____


Designation: Country Representative Date _____

(ii) Signed by AVSI employee/collaborator/partner

I, _____

hereby apply my signature to, irrevocably and unconditionally agree to the terms and conditions set out in the AVSI Policy on Prevention from Sexual Exploitation and Abuse and Sexual Harassment which I have read, understood and I commit to respect.

Signature _____ Date _____

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Annex 2-GL05

Safeguarding Focal Point Job Description

Background

AVSI's commitment to zero tolerance towards sexual exploitation and abuse towards beneficiaries (including children, women, girls and boys), AVSI staff and collaborators, is demonstrated by the presence of a series of documents, such as the Code of Ethics, the Child Safeguarding Policy, the PSEAH policy and the Whistleblowing policy, which the management of AVSI has undertaken to promote and disseminate among its staff at all levels. All of these policies provide all AVSI staff with clear guidelines for appropriate behavior in line with AVSI's professional expectations towards all its employees and collaborators, as well as the beneficiaries.

To support the implementation of the policy and the policy procedures, each AVSI national office designates a Safeguarding Focal Point, who is responsible for the implementation of the PSEAH and Child Safeguarding policies and the permanent training of the staff on it; he/she will be the contacted person for reporting suspected abuse, as per indications given in these two policies.

Role and Responsibilities

- Participate in the annual training organized by the HQ Policy Focal Point
- Conduct mandatory training and awareness-raising activities on the Policy for all staff at regular intervals, in collaboration and with the support of the HQ Policy Focal Point
- Make sure that the staff of projects fill in the Child Safeguarding risk assessment form, as required by the policy, and update the PSEA related risks in the risk assessment form and verify with the staff the possibility of reducing risks and, if necessary, send the forms to the Policy Focal Point at HQ level
- Support project staff in contextualizing awareness materials (given by AVSI HQ) for beneficiaries and local communities on the definition of SEA, the standards of conduct expected of AVSI's personnel, and the various mechanisms for raising SEA allegations or concerns, including contact details.
- Provide support to the Focal Point at HQ level for the implementation of other activities related to the policies, if requested.
- Receive reports of suspected abuse and coordinate the response, according to the procedures established in the policies
- Establish and/or strengthen AVSI's internal referral pathways to victim assistance services and keep updated services mapping for external SEAH services assistance.

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Annex 3-GL05

Self-certification of pending charges or regarding sexual exploitation and abuse


I, the undersigned _____ (surname and first name),
born in _____ (place of birth and province) on _____ (date of birth),
resident in _____ (place of residence), tax code _____ (number),
aware of the penal and civil sanctions, in the case of false declarations, the formation or use of
false documents, referred to in art. 76 of DPR no. 445 dated 28/12/2000 (Italian law), under my
responsibility,

I declare

that I have not been subject to criminal convictions and that I have no pending legal proceedings
for acts of violation of human rights, in particular for acts of "exploitation and sexual abuse", where
exploitation means any actual or attempted abuse of position of vulnerability, differential power or
trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically
from the sexual exploitation of another. Similarly, "sexual abuse" means actual or threatened
physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

In faith, I sign

Place and date

| | | |
|---|---|-------------------|
|  | AVSI Policy on Prevention from Sexual Exploitation and Abuse and Sexual Harassment | GL-DPRW-05 |
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Annex 4-GL05

Oath of Confidentiality for SEA Investigations

Purpose: Confidentiality is an important part of SEAH investigations and ensures that information collected during the investigation is shared only with authorized individuals. This tool is therefore used with translators, survivors' representatives, the so-called "support-system" and all people external to the main investigation team.

How to use this tool: translators, people who deal with the survivors, the so-called "support-system" and any other person not directly involved in the investigation must read and sign the oath of confidentiality in the presence of an investigator before participating in interviews and/or meetings and/or sharing information. The investigator also signs the document, ensuring that it is properly filed and preserved with the other documents of the investigation. If the investigation is conducted remotely, the document will ideally be signed in the presence of a member of the local investigation team. If this is not possible, the document must be signed via videoconference in the presence of the investigators.

I, the undersigned, shall exercise the utmost discretion with regard to my involvement in the investigation being conducted by _____ (name of the organization). I shall hold confidential all information known to me by reason of my activities on behalf of the investigation team. I shall not use such information for private gain, or to favor or prejudice a third party. I shall cooperate with the investigations and respond to all questions and requests from investigators honestly and fully. I shall not try to carry out my own inquiries or approach witnesses as this may disrupt the ongoing investigation.

I understand that this declaration will remain in force after the completion of my assignment with the _____ (name of the organization) investigation team. I also understand that divulging confidential information to persons who are not authorized to receive it may amount to misconduct and that the signed original of this declaration will be held in the relevant investigation file.

Your compliance with these requirements is imperative. Violations can potentially result in severe disciplinary measures. Kindly note that, if you learn or remember anything else that might be relevant to the investigation after your interview, please contact back the investigator.

Title:

Name:

Role:

Signature:

Date and place

Section to be filled out by the investigator before whom the oath is taken

Case Number:

Title:

Name

Signature:

Date and place:



**Annex 5-GL05
PSEAH Flow Chart**

