

# **Policy on the Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)**

**Fondazione Terre des Hommes Italia ONLUS**

*Approved by  
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*On June 5<sup>th</sup>, 2020  
Last revision June 2020*

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# 1. Background

## 1.1. Reference Framework and Policy Statement

Any form of **sexual exploitation, abuse and harassment** of affected populations represent a **failure in the safeguarding systems**. It causes harm to the people that TDH Italia aims to serve and protect. Any misconduct of TDH Italia staff and partners represents a risk for the organization's reputation. These phenomena are not new, and together with other forms of misuse of resources and power entrusted to specific actors, they **represent a constant organizational challenge** for humanitarian and development organizations. As sexual exploitation, abuse and harassment affect the accountability and integrity of humanitarian organizations, **PSEAH should not be addressed only as an issue related to sexual and gender-based violence, but it should be regarded as an ethical and organizational concern**.

This policy follows on directly from the **Terre des Hommes Italia's Ethical Code and Code of Conduct**, which identify the values on which the Foundation's activities are based and set out the requirements for the good conduct of staff and from the **Terre des Hommes Italia's Whistleblowing policy and the Minimum standards for Individual Referral**, which establish the mechanisms to report any behaviour that contravenes TDH values and to refer an individual in need of support respectively. This policy applies to both staff members and people outside the Foundation.

This policy applies to all Terre des Hommes Italia's staff, consultants, volunteers, suppliers, partners, service providers, in Italy and abroad, both during and outside working hours. It also applies to visitors, journalists, press and any other individual/entity that for any reason finds him/herself in contact with TDH Italia staff or with any individuals through Terre des Hommes Italia.

All individual/entities mentioned above are therefore required, without exception, to take all the necessary measures and undertake high levels of due diligence to prevent and manage any suspected or proven case of SEAH.

This policy applies exclusively to the protection and management of cases against staff, beneficiaries, and members of communities over the age of 18, while the **Child Protection Policy (CPP)** shall apply to any cases relating to a child. The CPP policy sets out the various types of abuse towards the latter and regulates all the methods for prevention and risk management.

This policy must be followed and applied in all the Countries in which TDH Italia operates, irrespective of any less binding legislation.

### **TDH Italia has a zero-tolerance policy towards sexual harassment, exploitation, and abuse.**

We believe all people have a right to live their lives free from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion, or ethnic origin. We recognize that there are unequal power dynamics across the organization and in relation to those we serve, and that we may face risk of some people exploiting their position of power for personal gain. TDH Italia will not tolerate its employees, volunteers, consultants, partners, or any other representative associated with the delivery of its work carrying out any form of sexual harassment, sexual exploitation, or sexual abuse. TDH Italia commits to supporting victims, improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse.

TDH Italia designated staff will use this Policy in conjunction with relevant employment/labour laws, duty of care and relevant criminal laws to make decisions about how to respond to any complaints and concerns raised. For further advice, please contact TDH Italia HQ or your local Focal Point (see ANNEX A for the Speak-up channels by Country of operation).

## 2. Definitions

TDH Italia adopts the following definitions in this Policy:

### **Sexual abuse**

Actual or threatened physical abuse of a sexual nature, which may take place by force, coercion, violence or in situations of inequality, hierarchical relations or a breach of trust. This term includes, but is not limited to, acts of rape, coercion, child pornography, non-consensual sexual acts or any other sexual offence, forced marriage, sexual slavery and any sexual activity with a child (i.e. any person under the age of 18). This means that physical force is not necessary for sexual abuse to be considered. Such an act may also occur in situations where apparent consent has not been given, in situations of inequality, psychological pressure or coercion. Consent to drink alcohol or use drugs must not under any circumstances be considered consent to sexual activity and in no way diminishes the perpetrator's responsibility.

### **Sexual exploitation**

Any actual or attempted sexual abuse of a person in a position of vulnerability, trust or where there is a power differential including, but not limited to, profiting financially, socially, or politically from the sexual exploitation of another. Prostitution, even when legal, is a form of sexual exploitation. This means that exploitation can also occur when an individual is an intermediary for the abuse.

### **Sexual Harassment**

Any unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature that explicitly or implicitly affects an individual's employment, interferes with an individual's work performance, creates an intimidating, hostile or offensive environment. Sexual harassment includes but is not limited to unwanted sexual text messages/emails, comments about anatomy/body parts, repeated offers for a date, deliberately infringing on body space, unwanted physical contact, etc. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

### **Victim or survivor**

A person who is, or has been, sexually exploited or abused. For the purposes of this policy, this is a person who has been sexually abused, exploited or harassed by one of the individual/entity categories listed above (see par. 1.1)

### **Zero tolerance**

Approach consisting in severely punishing any individual/entity falling under the categories listed above (see par. 1.1), who has committed a sexual offence against colleagues, beneficiaries or members of the communities in view of the unacceptable nature of such an act, whether this occurred as part of their activities with TDH Italia or in a private context.

## 3. Core principles

TDH Italia is committed to achieve the full implementation of the IASC Six Core Principles Relating to Sexual Exploitation and Abuse<sup>1</sup>.

### 3.1 TDH Italia core principles

1. Sexual exploitation and abuse by staff, consultants, volunteers, suppliers, partners, service providers, in Italy and abroad - both during and outside working hours - visitors, journalists, press and any other individual/entity that for any reason finds him/herself in contact with TDH Italy staff or beneficiaries through Terre des Hommes Italia constitute acts of gross misconduct and are therefore grounds for termination of any valid contracts, agreements, MoUs or any other form of collaboration and commitment. Sexual harassment is grounds for disciplinary action up to and including dismissal.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence. Prevention and response to any SEAH case regarding a child are governed by TDH Italia's CPP.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by all individuals/entities listed under principle 1 is prohibited. This includes buying sex and/or the exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between individuals/entities listed under principle 1 and beneficiaries is prohibited. Such relationships may undermine the credibility and integrity of TDH Italia. TDH Italia employees and related personnel as listed under principle 1 must immediately declare any existing relationships with beneficiaries to their Line Manager or to the Delegation Focal Point (see ANNEX A for contact details). Consensual sexual relationships between TDH Italia staff are discouraged, yet not forbidden.
5. Where any of the individuals/entities listed under principle 1 develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in TDH Italia or not, he or she must immediately report such concerns verbally or in writing via the established reporting mechanisms (see ANNEX A and TDH Italia Whistleblowing Policy for details).
6. TDH Italia employees, consultants, volunteers and partners are obliged to create and maintain an environment which prevents sexual exploitation, abuse and harassment and promotes the implementation of this Policy, TDH Italia's Ethical Code, Code of Conduct and Child Protection Policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

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

## 4. TDH Italia commitments

TDH Italia is dedicated to fulfilling the following commitments to prevent and respond to sexual exploitation, abuse and harassment as highlighted in the six Core Principles above.

To prevent and manage possible cases of SEAH, and ensure the reporting process is effective, TDH Italia bases its approach on the following:

### 4.1 Communities' and partners' engagement and accountability towards beneficiaries

To improve our understanding of the challenges and specificities of the local contexts in which the teams operate and to develop the appropriate tools and means of communication, it is important that each Delegation is able to identify the key stakeholders and entities that could play a role at community level in preventing, reporting and managing SEAH incidents.

Awareness raising on SEAH risks among local communities should be mainstreamed in all TDH Italia programs. Communities should be sensitized on the importance of denouncing any request for sexual favours, any abuse or pressure towards them, and should be aware of the strict ban on staff engaging in such behaviour and of the mechanisms in force to report any misconduct. TDH Italia zero tolerance approach should be clear among all communities. Emphasis must be placed on how best to communicate with beneficiaries and communities by using a language that is adapted to the local and cultural context. Also, to make it easier for communities to report, the reporting mechanism could be adapted to the reality on the ground, i.e. providing phone numbers of the Country office and/or appointing a trained staff to act as liaison between the community and the management.

Moreover, TDH Italia commits to promoting accountability towards our beneficiaries and the communities where we work by regularly seeking feedback from communities on TDH Italia's work, individual behaviours, and complaints and by presenting feedback to communities on what changes have been made resulting from community feedback.

National partners (i.e. local CBOs, NGOs, associations etc.) may play a crucial role in ensuring PSEAH in the field. TDH Italia staff should conduct a risk analysis before formalizing any new partnership. The assessment should at least verify if there is a PSEAH policy, documentation and practices in place for partners. If a Policy exists, verify that it includes a clear zero tolerance statement and a clear mention to the IASC Six Core Principles Relating to Sexual Exploitation and Abuse. If it doesn't exist, verify that the partner is willing to adopt TDH Italia's one and to receive TDH Italia's training for its staff.

TDH Italia should ensure that, when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements: (i) incorporate a clause on the commitment to respect this Policy; (ii) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation, abuse and harassment, to investigate and report allegations thereof, or to take corrective actions when SEAH has occurred, shall constitute grounds for TDH Italia to terminate such agreements.

Moreover, TDH Italia field staff should make sure trainings or briefings (in case of already trained staff) on this Policy and on partners' responsibility to implement it are planned at least once every calendar year. Training plan, attendance sheets and feedback forms (see ANNEX 3) should be kept in the Delegation archive and provided to the HQ upon request. If necessary, additional assistance should be provided to partners in line with this policy. Trainings may be organized either as frontal trainings or as distance meetings, making use of interactive online platforms (such as Skype, Zoom, Teams etc.).

### 4.2 Staff (including volunteers, service providers and consultants) and suppliers

**Recruitment.** In compliance with applicable laws, TDH Italia is committed to prevent perpetrators of SEAH from being (re)hired or (re)deployed. Therefore, **Job Vacancies** should include a mention to TDH Italia zero-tolerance towards SEAH and a clear statement of non-willingness to employ any person who has been found guilty of sexual exploitation, sexual abuse or sexual harassment. Job vacancies should also highlight that ethics is part of annual performance appraisal.

In compliance with what stipulated by relevant laws in Italy/Europe<sup>2</sup> and/or in the Countries where it operates, TDH IT should ensure safe recruitment. Therefore, whenever this is possible, during the recruitment process, a written reply to the following questions should be received from the preselected candidates:

**A. Have you ever undergone criminal/civilian convictions? Have you ever abused a child? If yes, please provide details**

**B. Have you ever undergone any internal investigation by one of your former employers? If yes, please provide details on reason/s for investigation, outcomes and the contact details of your direct Line Manager at the time of the investigation**

**Should the answers received be positive or unclear, TDH Italia staff in charge of the recruitment shall exclude the candidate from the process.**

Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, including employees, volunteers, consultants and other representatives. As part of this, reference forms used both at HQ and at Delegation level must include the following:

In compliance with what stipulated by relevant laws in Italy/Europe<sup>3</sup> and/or in the Countries where TDH Italy operates, whenever this is possible, during the recruitment process, a written reply to the following questions should be received from the referees of preselected candidates:

**A. Was the Candidate found to have committed Misconduct (sexual exploitation, sexual abuse, or sexual harassment) during the period of employment with your organization/company? If yes, please specify the nature of the misconduct or the legal/regulatory requirements preventing you to disclose this information**

**B. If the answer is yes, was a Disciplinary Measure imposed upon the Candidate?**

The disciplinary sanction was:

Date of disciplinary sanction:

If you are unable to provide an answer, please state here legal/regulatory requirements preventing you to do so

**C. Is the Candidate currently being investigated for an allegation of sexual exploitation, sexual abuse or sexual harassment?**

**Should the answers received be positive or unclear, TDH Italia staff in charge of the reference check shall NOT hire the candidate.**

**Whenever the above is forbidden by applicable laws, a general question should be included in the request for reference, as follows:**

**- Please identify any areas where you feel she/he could benefit from improvement either personally or professionally**

**Purchase process.** During the purchase process (for works, goods or supplies), candidates or participants **should declare, while filling the Vendor Form**, they respect basic social rights and working conditions and do not exploit child labour. Otherwise their application is deemed ineligible. They should also formally acknowledge that failure to comply with TDH IT ethical principles constitutes ground for TDH Italia to terminate any valid agreement with them.

**Contracting.** All **contracts** and volunteer agreements should include a standard clause requiring contractors, suppliers, consultants, staff, volunteers, service providers, etc. on the commitment to respect this Policy; contracts should expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation, abuse and harassment, to investigate and report allegations

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<sup>2</sup> Please, bear in mind that asking these questions is a breach of personal privacy according to Italian/European legal system, therefore this cannot be applied to recruitment done at the HQ.

<sup>3</sup> Please, bear in mind that asking these questions is a breach of personal privacy according to Italian/European legal system, therefore

thereof, or to take corrective actions when SEAH has occurred, shall constitute grounds for TDH Italia to terminate such agreements. All staff, consultants, volunteers, journalists, press and any other person who may for any reason finds him/herself in contact with TDH Italy staff or beneficiaries through Terre des Hommes Italia should also sign a commitment to abide by this policy (see ANNEX 2 – Samples of commitment).

Roles and responsibilities of personnel with specific PSEAH-related responsibilities should be clearly mentioned in their contracts and/or **ToR**.

**Performance appraisal forms** should include a question about adherence to TDH IT policies and related trainings, including on PSEAH.

**Performance appraisal forms for Senior Management** should include a question about the adherence to create and maintain an environment which prevents sexual exploitation, abuse and harassment and promotes the implementation of TDH IT policies, including on PSEAH.

**Staff Regulations.** Each Delegation should ensure that the sanctions that may be imposed against the employee are comprehensively set out in the Staff Regulations in force.

**Suppliers.** All contract with suppliers should include the zero-tolerance clause, and SEAH should be listed among the reasons for immediate contract termination by TDH Italy, unless this is forbidden by local laws.

**Staff training.** Each calendar year, all staff and volunteers should receive a training session on this policy. Trainings may be organized either as frontal trainings or as distance meetings, making use of interactive online platforms (such as Skype, Zoom, Teams etc.). A draft training agenda is available in ANNEX 3. By the end of the training, staff and volunteers should be able to understand the meaning of SEAH and bear in mind the actions they are required to take in case of allegations/investigations take place. Training material (agenda, attendance list, feedback forms, pictures or other relevant documents) should be archived and shared with HQ upon request.

Anyone working directly with beneficiaries on behalf of TDH Italia must receive additional yearly training/refresher training – that could be done also individually in form of a brainstorming for staff who is employed from more than 1 year - on how to receive complaints and handle them in a safe and confidential manner. The Country Delegate is responsible to keep track of such trainings/refreshers in the Delegation archive and to share them with HQ upon request.

#### 4.3 Dissemination of the Policy and preventive measures for safer programming

The Definitions included in this Policy, TDH Italia principles and relevant Speak-up channels should be translated in the local language and displayed at all TDH Italia offices and project sites. All TDH Italia Managers are expected to set an example by behaving impeccably.

TDH Italia staff is required to take proactive measures to avoid causing inadvertent harm to civilians, contribute to actively reduce existing threats and ensure programs are conflict sensitive. This includes embedding good practice and SEAH prevention measures throughout the program and project cycle, including project design, assessments, budgets and monitoring and evaluation.

Specifically:

- **Project design:** a risk analysis on SEAH should be available before designing any projects. Risk analysis should include a comprehensive community/beneficiaries' profile (for instance: number of people disaggregated by age and gender; service availability – health, education, protection etc.) – the risk analysis could take the form of a written stand-alone document or be embedded into the project proposal.
- **Assessments:** assessments should include detailed (and, if possible, first-hand) information about community awareness on SEAH. As part of any assessment, it is recommended to identify groups that are most marginalized and at heightened risk of SEAH, to ensure that design strategies are as targeted and effective as possible.<sup>4</sup>
- **Budgeting:** whenever allowed by the donor and useful for the implementation of project activities, resources should be budgeted to: conduct training/awareness sessions on PSEAH, cover ad-hoc staff

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<sup>4</sup> For more information on this topic, see the [Guidelines for the Design and Implementation of SEAH Prevention Measures](#) (2015).



with specific responsibilities (with regard to both prevention and response) and ensure the Policy is correctly disseminated.

- **Monitoring and evaluation:** the M&E component of projects should consider routine monitoring of identified SEAH risks, appropriate protective measures (that are in line with international laws and standards), collection of feedbacks from beneficiaries and tracking of referrals. Consultations with beneficiaries should be safe and culturally appropriate.

## 5. Reporting, investigation, and referral

TDH Italia will make every effort to create and maintain a safe organizational culture for all those who work for and with TDH Italia, as well as those in the communities where TDH Italia operates through robust prevention and response work, offering support to victims, and holding those responsible for sexual harassment, exploitation or abuse to account.

### 5.1 Reporting and investigation

The main procedures and mechanisms to report any complaints (including related to SEAH) and TDH Italia investigation mechanisms are included in **TDH Italia Whistleblowing Policy**. TDH Italia is fully committed to apply all measures included in the Whistleblowing Policy (i.e. internal investigation – involving an experienced lawyer if needed - and/or resorting to the police) with no exceptions and to keep track of allegations and response measures.

Regarding complaints concerning SEAH, especially if coming from people outside TDH Italia (including our beneficiaries), it is of outmost importance to ensure safety, confidentiality, transparency and accessibility, as these people might be more exposed to the risk of retaliations than TDH Italia staff. TDH Italia will act against anyone, whether they are the subject of a complaint or not, who seek or carry out retaliatory action against complainants, victims, or other witnesses.

### 5.2 Referral and support to victims

Victims of SEAH may need specialized support services. Whenever the need is there, TDH Italia commits to refer victims to competent support services as appropriate and available and according to the willingness and the needs of the victim.

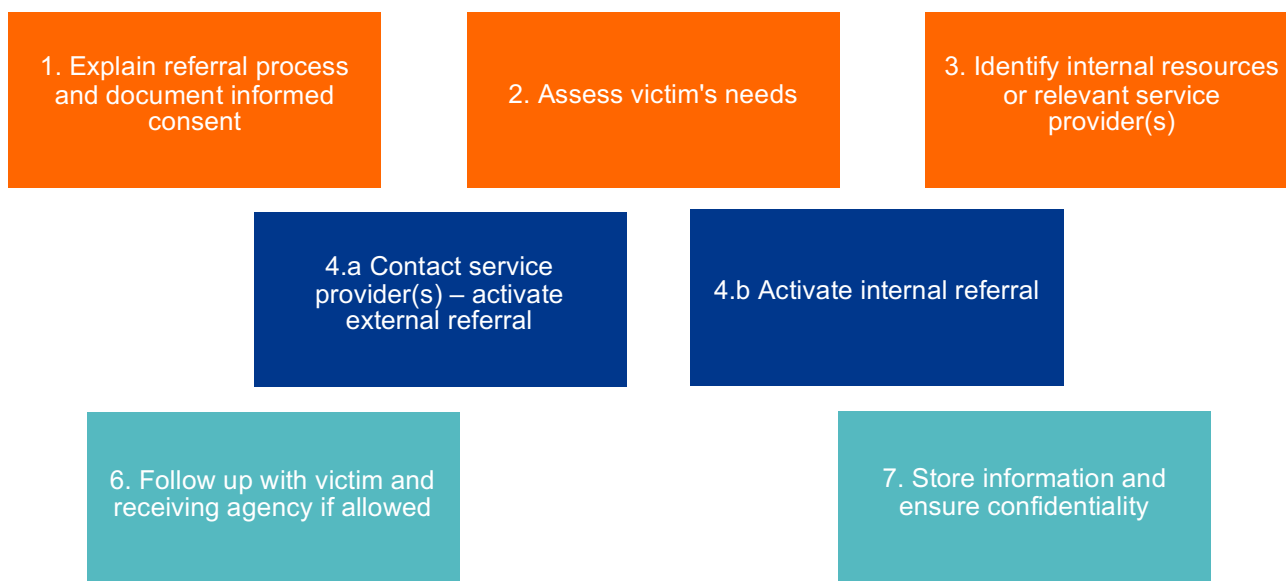
Referrals should be guided by precise guidelines and handled by the Country Delegate or, upon HQ's approval, by another staff appointed by the Country Delegate. A detailed explanation of how to carry out internal and external referral safely and correctly are available within TDH Italia Minimum Standards for Individual Referral. Here follows a short summary of the main steps to be usually followed.

Main steps for ensuring proper referral are the following:

**1. Have an updated list of local service providers, agencies or national institutions/authorities. In Countries where a list of this kind is available at National/Cluster/Working Group/s level, this can be adopted.** The list should provide options for both children and adult victims where relevant (e.g. names of a paediatric and adult medical care provider/facility). The list shall include (if existing): existing safe shelters, relocation services, medical care facilities, psychological/psychosocial/case management services, legal assistance services, list of providers of basic material assistance (FIs and NFIs, non-formal education, livelihood support services), facilities providing support for children born as a result of SEAH. If a Delegation is unable to conduct the external referral process on its own, existing and reliable service providers/organizations should be also included.

**2. Strictly adhere to the minimum standards guiding the referral process**, as outlined in TDH Italia Minimum Standards for Individual Referral, outlining the steps that personnel need to take (see graphic below), including referral forms. Make sure that those involved in the process are adequately trained on how to refer SEAH cases safely and confidentially for assistance, including those cases involving children. If a Delegation

is unable to conduct the referral process on its own, it should contact external and pre-identified service providers or organizations for support.



Please note that staff should be flexible in applying these steps and should adapt this process to meet the needs of the victim.

3. **Always obtain consent before facilitating assistance**, respecting the right of a person<sup>5</sup>, including children, to freely choose which type of support services they want to access or to decline services entirely.

4. **Always respect confidentiality**, protecting identifying information of all those involved in the alleged incident.

## 6. Summary: Action Points

Action points to be taken by each Delegation and/or HQ	
Action	Responsibility of
<ul style="list-style-type: none"> <li>Ensure full compliance with this policy at Country level</li> </ul>	<ul style="list-style-type: none"> <li>HQ: TDH IT President</li> <li>Country level: Country Delegate, supported, where existing, by PSEAH focal point</li> </ul>
<ul style="list-style-type: none"> <li>Identify the key stakeholders and entities that could play a role at community level in preventing, reporting and managing SEAH incidents.</li> </ul>	<ul style="list-style-type: none"> <li>Country level: Project/Program Managers</li> </ul>
<ul style="list-style-type: none"> <li>Prepare and regularly update a list of stakeholders that could prevent, report and manage SEAH incidents at community level</li> </ul>	<ul style="list-style-type: none"> <li>Country level: Country Delegate/Program Manager</li> </ul>
<ul style="list-style-type: none"> <li>Assess partners against SEAH prevention before formalizing any partnership</li> </ul>	<ul style="list-style-type: none"> <li>HQ: Program Manager</li> <li>Country level: Country Delegate, in coordination with Project/Program Managers</li> </ul>
<ul style="list-style-type: none"> <li>Plan annual trainings/briefings on this Policy and on partners' responsibility to implement it; collect and archive training plan, attendance sheets and feedback forms</li> </ul>	<ul style="list-style-type: none"> <li>HQ: TDH IT President and TDH IT General Director</li> <li>Country level: Country Delegate, supported, where existing, by PSEAH focal point</li> </ul>
<ul style="list-style-type: none"> <li>Deliver annual trainings/briefings to TDH IT</li> </ul>	<ul style="list-style-type: none"> <li>A person appointed by the Country Delegate,</li> </ul>

<sup>5</sup> Persons with disabilities may need specific support to enable their ability to provide informed consent depending on the nature of their ...

and partners' staff	in agreement with HQ (it could be someone working at the HQ/other Delegations, the Country Delegate, another Delegation staff or an external consultant)
<ul style="list-style-type: none"> <li>• Ensure safe recruitment (from the publication of the Job Vacancy to the reference check)</li> </ul>	<ul style="list-style-type: none"> <li>• HQ: TDH IT General Director, referent Desk Officer/Program Manager</li> <li>• Country level: HR Manager and/or Country Delegate and/or Project/Program Managers</li> </ul>
<ul style="list-style-type: none"> <li>• Ensure safe procurement and contracting</li> </ul>	<ul style="list-style-type: none"> <li>• HQ: referent Desk Officer/Program Manager</li> <li>• Country level: Country Admin and/or Program/Project Admin, in coordination with Log staff</li> </ul>
<ul style="list-style-type: none"> <li>• Ensure that definitions included in this Policy, TDH Italia principles and relevant Speck-up channels are translated in the local language and displayed at all TDH Italia offices and project sites</li> </ul>	<ul style="list-style-type: none"> <li>• Country level: Program/Project Managers, in coordination with key field staff and partners</li> </ul>
<ul style="list-style-type: none"> <li>• Ensure safe programming (risk analysis, assessment when relevant, project design/budgeting, M&amp;E)</li> </ul>	<ul style="list-style-type: none"> <li>• HQ: program Manager</li> <li>• Country level: Program/Project Managers, in coordination with Program/Project Admin and M&amp;E staff</li> </ul>

## ANNEX 1- Speak-up Channels Terre des Hommes Italia for people outside the Foundation

HQ – TDH Italia Milano	Whistleblowing <a href="mailto:reclami@tdhitaly.org">reclami@tdhitaly.org</a> <a href="mailto:d.vergari@tdhitaly.org">d.vergari@tdhitaly.org</a> +39 (0)2 28970418
TDH IT Delegation in Haiti	Whistleblowing
TDH IT Delegation in Ecuador	Whistleblowing
TDH IT Delegation in Nicaragua	Whistleblowing
TDH IT Delegation in Colombia	Whistleblowing
TDH IT Delegation in Perù	Whistleblowing
TDH IT Delegation in Burkina Faso	Whistleblowing
TDH IT Delegation in Côte d'Ivoire	Whistleblowing
TDH IT Delegation in Tunisia/Lybia	Whistleblowing
TDH IT Delegation in Mauritanie	Whistleblowing
TDH IT Delegation in Mozambique	Whistleblowing
TDH IT Delegation in Niger	Whistleblowing
TDH IT Delegation in Zimbabwe	Whistleblowing
TDH IT Delegation in Jordan	Whistleblowing
TDH IT Delegation in Lebanon	Whistleblowing <a href="mailto:l.ricciardi@tdhitaly.org">l.ricciardi@tdhitaly.org</a> <a href="mailto:i.masieri@tdhitaly.org">i.masieri@tdhitaly.org</a>
TDH IT Delegation in Palestine	Whistleblowing <a href="mailto:palestina@tdhitaly.org">palestina@tdhitaly.org</a> <a href="mailto:i.masieri@tdhitaly.org">i.masieri@tdhitaly.org</a>
TDH IT Delegation in Iraq	Whistleblowing
TDH IT Delegation in Syria	Whistleblowing
TDH IT Delegation in Bangladesh	Whistleblowing
TDH IT Delegation in India	Whistleblowing

## ANNEX 2 - Samples of Commitment

### 1. Staff appointed by HQ

#### Declaration

I the undersigned... ..

↑ Contracted by Fondazione Terre des Hommes Italia in .....

↑ Project/Program Manager of the Project/Program .....

↑ Country Delegate in .....

#### Declare

**That I have received, read and understood all rules and regulations set forth in the manuals to manage local offices of the Country delegations of Terre des Hommes Italia and included in the following documents:** TDH I Manual for managing local offices” Annex I and Annex II, TDH I Procurement procedures with its Annexes, Code of Ethics, Organizational Model, Antifraud Policy, Child Protection Policy, whistleblowing Policy, PSEAH Policy and Minimum Standards for Individual Referral **and that by contract I am required to strictly observe them.**

Yours faithfully, .....

Date, place and signature

### 2. Staff appointed at Delegation level (to be adapted to the procedures in place at each Delegation)

#### Declaration

I the undersigned... ..

↑ Contracted by Fondazione Terre des Hommes Italia as .....

↑ Within TDH Italia Delegation in .....

#### Declare

**That I have received, read and understood all rules and regulations in place at Terre des Hommes Italia’s Delegation in ..... and included in the following documents:** Internal Staff Regulations, Security Guidelines, Code of Ethics, Antifraud Policy, Child Protection Policy, Whistleblowing Policy, PSEAH Policy and Minimum Standards for Individual Referral **and that by contract I am required to strictly observe them.**

Yours faithfully, .....

Date, place and signature

## ANNEX 3 – Suggested Training Agenda and related forms

Note: Each Delegation could modify this training agenda based on the specific audience. Trainings may be organized either as frontal trainings or as distance meetings, making use of interactive online platforms (such as Skype, Zoom, Teams etc.).

ACTIVITY	EST. TIME	RESOURCES
<b>INTRODUCTION</b>		
<b>Welcome and introduction</b> <ul style="list-style-type: none"> <li>Introduction of trainer(s) and learners</li> <li>Overview of training agenda</li> </ul>	<b>10 min</b>	<ul style="list-style-type: none"> <li>Handout: Training agenda</li> </ul>
<b>SESSION 1: UNDERSTANDING SEXUAL EXPLOITATION, ABUSE AND HARASSMENT</b>		
<b>Presentation: Key definitions and concepts</b> <ul style="list-style-type: none"> <li>Definition of SEAH</li> <li>TDH It Zero-Tolerance Policy on SEAH</li> <li>Roles and responsibilities of personnel in preventing and responding to SEAH</li> </ul>	<b>15 min</b>	<ul style="list-style-type: none"> <li>Handouts: Copies of PSEAH Policy, code of conduct, Whistleblowing policy, Child Protection Policy, Ethical Code</li> </ul>
<b>TDH Italia Core principles and commitments towards SEAH</b> <ul style="list-style-type: none"> <li>Present principles and commitments and discuss with participants which situations may expose TDH Italia staff and beneficiaries to SEAH risks</li> </ul>	<b>30 min</b>	
<b>Group exercise: Impacts of SEAH</b> <ul style="list-style-type: none"> <li>Divide participants in small groups (try to have diverse groups in terms of gender, age, background and role within the organization). Ask groups to identify the (potential) consequences of SEAH on a) the victim(s), b) the community, c) the organization, and d) others. Present outcomes in front of the audience</li> </ul>	<b>45 min (30 minutes exercise, 15 minutes restitution)</b>	
<b>SESSION 2: TAKING ACTION AGAINST SEAH</b>		
<b>Presentation: Overview</b> <ul style="list-style-type: none"> <li>Overview of responses to SEAH (prevention, reporting, investigation and referral) and guiding principles</li> </ul>	<b>10 min</b>	<ul style="list-style-type: none"> <li>Handouts: Copies of PSEAH Policy, code of conduct, Whistleblowing policy, Child Protection Policy, Ethical Code</li> </ul>
<b>Group discussion: Prevention</b> <ul style="list-style-type: none"> <li>Discuss how to identify and mitigate risks of SEAH in the given context (What are warning signs? Why are they ignored? What more can the organization do to prevent SEAH?)</li> </ul>	<b>20 min</b>	

<b>Presentation: Reporting and investigation</b> <ul style="list-style-type: none"> <li>• Mandatory reporting</li> <li>• How to report SEAH allegations</li> <li>• Overview of investigation process</li> <li>• Consequences for personnel if allegations are substantiated</li> </ul>	<b>20 min</b>	<ul style="list-style-type: none"> <li>• Handout with contact information of speak up channels</li> </ul>
<b>Presentation: Referral and support to victims</b> <ul style="list-style-type: none"> <li>• Referral pathways</li> <li>• Core principles and minimum standards</li> </ul>	<b>20 min</b>	<ul style="list-style-type: none"> <li>• Handout with referral forms and minimum standards</li> </ul>
<b>CONCLUSIONS</b>		
<b>Conclusions</b> <ul style="list-style-type: none"> <li>• Ask learners to fill attendance sheet and feedback on training</li> </ul>	<b>10 min</b>	Feedback forms, attendance sheet



**Training topic**

**Date, time and venue**

**Name of facilitator/s**

**Attendance sheet**

No.	Name	Position	E-mail address	Training	Refresher	Signature
1						
2						
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## TDH Italia PSEAH Policy Training TRAINING FEEDBACK FORM

1. Learning objectives of the training were:

By the end of the training you should be able to

- Describe SEAH and TDH Italia core principles towards it
- Describe roles and responsibilities of personnel in preventing and responding to SEAH
- Identify situations that may expose TDH Italia staff and beneficiaries to SEAH risks
- Understand potential consequences of SEAH on the victim(s), the community, the organization, and others.
- Describe and apply TDH Italia commitments and standards according to your role within the organization
- Understand consequences on TDH Italia staff if allegations of SEAH are substantiated

Did you feel the learning objectives were achieved?

Very little       Somehow       Fairly       Completely

How much was the topic interesting to your work?

Very little       Somehow       Fairly       Very much

Please mention 3 skills/new concepts that you got through the training.

1.

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2.

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3.

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Any other comment or feedback you want to share

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**Thank you!**