Introduction

CIDAS – Limited Liability Social Cooperative Society operates in the field of personal services and has as its corporate purpose the organization and management, on its own or on behalf of public and private entities, of personal services, pursuant to articles 3 and 4 of the Social Statute of the Cooperative.

CIDAS has a zero tolerance policy towards ***Sexual Exploitation and Abuse*** (hereinafter SEA), which is behavior that violates universally recognized international legal norms and standards.

All CIDAS personnel are expected to maintain the highest standards of personal and professional conduct, and to deliver care and services in a manner that respects and promotes the rights of beneficiaries and other vulnerable members of communities.

Purposes and recipients

This document aims to establish the Policy of **CIDAS – Social Cooperative** on the ***Protection From Sexual Exploitation and Abuse*** (*hereinafter PSEA*).

This document is addressed to all CIDAS personnel, including executives, employees, partners, internal and external collaborators, consultants, operators present in all the structures managed by CIDAS or in which CIDAS operates, CIDAS suppliers and contractors.

It is also addressed to:

- employees, internal and external collaborators, consultants of entities other than CIDAS, who have established a collaboration relationship, partnership, or any collaboration agreement with CIDAS;
- current and potential future suppliers of goods and services;
- the rest of the people not included in the categories mentioned above and who have signed a contract with CIDAS.

Glossary

Sexual Exploitation: *abuse/attempted physical abuse* carried out by force or under conditions of coercion against a vulnerable person or in a situation of inequality due to an imbalance of powers, aimed at obtaining an economic, social or political gain derived from the sexual exploitation of another person (e.g. trafficking, prostitution).

Sexual Abuse: any non-consensual sexual activity/contact, even if not characterized by explicit violence. Involvement in sexual activities, physical or psychological, of a person unable to choose: either because subjected to physical and/or psychological constraint, and/or because he is not aware of his own actions (for example due to age, a particular psychophysical condition, etc.).

Beneficiary - User: person who receives help/support under specific assistance services or programmes. Persons with this title include recipients of CIDAS services, members or affected populations, including refugees and

displaced persons, as well as people belonging to the most vulnerable categories: minors, women, elderly people, disabled ones, people in marginal social conditions and other similar cases.

SEA: acts of sexual exploitation or abuse perpetrated against beneficiaries, employees, partners, internal and external collaborators, consultants, operators present in all the structures managed by CIDAS or in which CIDAS operates, suppliers and contractors of CIDAS. They can be committed by personnel *external* to CIDAS or by a member of the community involved, or even by one beneficiary himself against another beneficiary or by any member of CIDAS *internal* staff.

Whistleblowing: report made by the staff of the cooperative or by people external to CIDAS to express a concern or report an event at risk or of abuse in the context of the cooperative's activities.

Programmatic statement

Through this Policy, CIDAS is committed to creating and maintaining a secure environment, free from SEA, and taking appropriate measures through a robust PSEA framework, including prevention and response measures. It undertakes to *prevent and fight sexual exploitation and abuse against the beneficiaries and members of the community*, employees, partners, internal and external collaborators, consultants, operators present in all the managed structures by CIDAS or in which CIDAS operates, suppliers and contractors of CIDAS by staff and all parties named. Minimum standards are established to assist and protect beneficiaries from sexual exploitation and abuse.

CIDAS applies a *zero tolerance* policy towards sexual exploitation and abuse (SEA), as well as other types of sexual and gender-based violence, against beneficiaries of any age, gender, gender identity, employees and collaborators. It is also committed to ensuring that the CIDAS workplace is a safe environment with zero tolerance towards SEA and other forms of workplace violence.

All principles and standards set forth in this Policy must be implemented at all times, *during office hours and in personal life*, without exception, regardless of location, rank, type or length of office.

CIDAS is committed to *supporting victims, enhancing the capacity to safeguard, report, investigate, respond* and prevent sexual exploitation and abuse. It also undertakes to define clear and safe reporting and/or reporting procedures for victims of SEA.

Fundamental principles[1]

1. Sexual exploitation and abuse in CIDAS by staff, associates, consultants, volunteers, suppliers, partners, - both during and outside working hours - and any other person/entity who for any reason is in contact with staff or beneficiaries, partners, collaborators, suppliers and contractors of CIDAS, are grounds for disciplinary

[1] The principles reported in this paragraph recall the 6 fundamental principles drafted by the Inter Agency Standing Committee (IASC - Six Core Principles Relating to Sexual Exploitation and Abuse)

action and termination of any contract, agreement, memorandum of understanding or any other form of collaboration and commitment.

2. Sexual activity with minors (persons under the age of 18) is prohibited. Mistaken belief regarding the age of a minor is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour towards beneficiaries is strictly prohibited.
4. It is forbidden for CIDAS personnel, both internal and external, to engage in any form of sexual activity/relationship with the beneficiaries, directly subordinate employees, internal and external collaborators, consultants, suppliers and contractors of CIDAS to avoid the establishment of conflicts of interest and potential situations of abuse of power, which could undermine the healthiness of the work environment and the integrity of CIDAS. In the event, the interested party must immediately report the incident to his manager, under penalty of initiating disciplinary action.
5. It is absolutely forbidden for CIDAS personnel to support or participate in any way in any form of exploitation or abuse, including human trafficking or pornography.
6. CIDAS managers, employees, consultants, associates and partners are obligated to create and maintain an environment that prevents sexual exploitation, abuse and harassment and promotes implementation of this Policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.
7. CIDAS personnel must report any potential risk of SEA, and confront potential situations at risk of SEA or otherwise any misconduct.

Roles and responsibilities

Within CIDAS, the Cooperative's Board of Directors is the figure/entity in charge of implementing this Policy, verifying activities and managing cases.

At an operational level, the coordinators, managers/contact persons of the services and structures are in charge of constantly monitoring the situation and activating the necessary procedures in case of detection of critical cases.

The managers will act as a liaison between the coordinators and the Legal Department of the cooperative.

CIDAS activities and commitments

1. Risk prevention and mitigation

CIDAS implements the following activities for the prevention and mitigation of SEA risk.

1.a Personnel selection

The program and project managers and the Human Resources Department ensure a *recruitment screening* process for all staff, especially for people who will have direct or indirect contact with the beneficiaries. Checks are carried out on the background of the candidates, including any criminal proceedings against them and previous reprimands

or disciplinary measures (in case of reemployment), by submitting a specific self-certification to the candidate's signature.

CIDAS reserves the right to withdraw any job offer or terminate any form of contractual relationship if the candidate has provided false information regarding any conviction for acts of SEA.

New resources are asked to read and sign this Policy, together with the appropriate self-declaration.

Periodic internal monitoring and checks are carried out regarding the implementation of this Policy.

The personnel and partners of CIDAS and related parties are perfectly aware of the Fundamental Principles contained in this Policy, and undertake to ensure their implementation.

1.b Staff training

CIDAS provides a training module aimed at personnel, intended to increase awareness and prevent critical events, including SEA cases and to ensure that all employees, partners and collaborators know how to forward a report or fill out a complaint.

Managers, operational and coordination staff are trained on the immediate handling of SEA cases, and on the correct handling of complaints.

1.c Risk analysis during planning phase

The conceptual phase of any project involves the analysis and assessment of the risks of SEA, as well as the analysis of the needs of the group of beneficiaries. It also provides for a mechanism for monitoring and managing SEA cases. Where appropriate, the implementation of activities aimed at preventing SEA cases is envisaged.

1.d Communication and Privacy

The material produced in the context of communication activities (for example photographs, videos) is controlled, consensual and respects the dignity of the person.

People's identity is protected where necessary. No personal information relating to the beneficiaries is disclosed, unless explicit consent is given.

The privacy of the beneficiaries, especially minors, is strictly and absolutely guaranteed.

2. Response mechanisms

2.a Reporting

The main tool is the Form attached to the Critical Events Operational Instruction. Members of CIDAS, at all levels of the organization, who have reason to believe that an episode of SEA by a staff member or collaborator may have occurred must file a complaint immediately pursuant to the Critical Events Operational Instruction, by completing the

Form, even anonymously. The report can also be made directly to your own manager or to the Human Resources Department, who will then forward it to the Legal Department.

Simplified, secure and multilingual reporting or reporting mechanisms are made available to the beneficiaries.

Those who make a report or complaint (*whistleblowing*) are protected from retaliation at a legal and organizational level, and their anonymity is guaranteed. CIDAS will do everything possible to protect the privacy of the people involved and to ensure that the complainant and the accused are treated fairly. Information on individual reports is strictly confidential and is treated as such. Any ascertained retaliation will be punished by disciplinary sanctions.

2.b Investigation and referral

In the event of reporting or filing a complaint of SEA cases, real or presumed, CIDAS puts in place a timely response and action system.

- The complaint is promptly taken over by the Legal Office; the degree of urgency is assessed and an internal investigation is launched, to acquire the elements necessary for analyzing the situation;
- If the crime situation presents elements of immediate evidence, the complaint/report is reported to the competent authority;
- Forms of support to the victim are guaranteed;
- Constant shadowing is provided for the accused person if he is not suspended as a precaution, especially if employed in activities that involve contact with beneficiaries, complainant or victim;
- In the event that the investigations give a positive result, the guilty person of SEA is definitively removed.

The accused person is made aware of the complaint/report concerning him. The accused person is guaranteed the opportunity to report his version of events.

The documentation produced is kept and archived in employee, supplier or user files, as appropriate, and made available if requested by third-party authorities, such as judicial institutions.

2.c Victim assistance

If a victim of SEA files a complaint, this is first of all made safe, also guaranteeing an initial psychological support, and at the same time complaint management systems are activated, also from a legal point of view, with an evaluation by the Legal Office regarding the necessary activation by the cooperative of the competent public authorities.

3. Collaboration agreements

3.a Partners, contractors, subcontractors

CIDAS undertakes not to establish partnerships or collaborations, and to resolve those in progress, with subjects with respect to which a dubious ethical conduct emerges in terms of SEA.

If necessary, CIDAS requests third parties, such as partners/contractors/contractors, *to provide their own PSEA Policy*, or to sign this CIDAS *Policy* for internal ratification and application, in the context of existing or future projects and/or new partnership agreements.

Where possible and/or necessary, CIDAS reserves the right to conduct background checks on the aforementioned third parties.

During the process of identifying suppliers (for works, goods or supplies), candidates or participants must declare that *they respect social rights* and basic working conditions and *do not exploit child labor*.

3.b Visitors and external people

This Policy applies to any visitor (including journalists, press, administrative and/or institutional figure) who comes into contact with the beneficiaries and staff, partners, collaborators of CIDAS. It also applies to any external figure involved in any capacity in a project or program managed or implemented by CIDAS.