



**Protection from Sexual Exploitation,
Abuse and Harassment (PSEAH) Policy**
WeWorld-GVC Foundation

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1. INTRODUCTION

WeWorld-GVC (hereinafter in short WeWorld) is a foundation that has been established in December 2018, following the merger of WeWorld Onlus (established in Milan in 1999), and the GVC Association (established in Bologna in 1971). The foundation works across 26 countries, including Italy, to ensure that the fundamental rights of every human being, especially children and women, are recognized and respected, tackling poverty, violence and injustice, whilst generating opportunities and sustainable development.

WeWorld strives for a better world where everyone, including children, have equal opportunities and rights, access to resources, healthcare, education, and fair employment. A world where a positive and inclusive environment is fostered; where war, violence and exploitation are banned. A world where nobody is left behind.

The primary groups for WeWorld operations are children, young persons and women, namely 'actors of change' in every community for a fairer and more inclusive world. Through development programmes WeWorld helps people overcome emergencies so that they can rebuild and lead a dignified life and look ahead to a future that offers opportunities (within the context of Agenda 2030).

This policy is complementary to the set of standards of behaviour that all WeWorld personnel are already required to adhere: the Code of Ethics and Conduct, Antifraud and Anticorruption Policy, and the 231 Procedures also referred as the Model.

PURPOSE AND AIM OF THE POLICY

WeWorld strongly believes that everyone has the right to live their lives without fear from sexual abuse, exploitation and harassment (SEAH). This Policy has been developed to ensure that right-holders, community members, employees and representatives alike are protected from any form of SEAH.

The purpose of the Policy is to steer the organisation, its employees and representatives to create and promote safe working environments by preventing SEAH.

SCOPE AND RECIPIENTS OF THE POLICY

WeWorld is committed to fostering the well-being of every human being. The scope of the Policy is to detail core principles, behavioural standards, preventative measures and procedures in building a safe working environment in every aspect of the organisation's operations and beyond.

This Policy applies to:

- All WeWorld staff, volunteers, consultants and representatives worldwide

- Partners, suppliers, contractors, subgrantees or those who otherwise have a contractual relationship with WeWorld, unless it has been agreed that the partner will apply its own PSEAH Policy;
- Journalists, photographers and any other visitors in any capacity.

2. POLICY STATEMENT

Promoting and maintaining a safe environment for all is one of the founding pillars on which the work of WeWorld is built on. In line with this fundamental principle, WeWorld does not tolerate and strictly prohibits any form of SEAH, as well as any non-sexual abuse, exploitation or harassment against anybody.

WeWorld upholds protection from SEAH throughout its programmes, ensuring that staff, partners, consultants, suppliers, contractors, volunteers, interns and board members (hereinafter “the recipients” of this Policy) adhere to the PSEAH Policy at all times. The core principles, along the preventative measures detailed in this Policy, are aimed at creating and strengthening a safe working culture, where nobody is subjected to SEAH or any other form of physical or mental abuse, exploitation or harassment.

WeWorld works in partnership with parents, caregivers, communities, stakeholders and other professionals to mainstream protection from SEAH.

WeWorld is committed to upholding the Six Core Principles Relating to Sexual Exploitation and Abuse of the Inter-Agency Standing Committee (IASC).¹

1. “Sexual exploitation and abuse by humanitarian workers 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. Mistaken belief regarding the age of a child 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 is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their

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

code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.”

Additionally, all WeWorld works in accordance with IASC’s Rules on Sexual Conduct for Humanitarian Workers. Humanitarian workers can be disciplined – even fired – for unacceptable behaviour in relation to sex. These are the rules they must comply with:²

- Humanitarian workers are not allowed to have sexual relationships with anyone under the age of 18, even if it is legal in their country. Saying they did not know the person’s true age is not a valid excuse.
- Humanitarian workers are not allowed to pay for sex with money, employment, goods or services – including goods and services intended as aid to people in need. They must not use promises of these things to make other people accept any kind of behaviour that humiliates or exploits them. This includes paying or offering money for sex with a sex worker.
- Humanitarian workers have influence over who receives goods and services. This places them in a position of power in relation to people who need assistance. For that reason, humanitarian organizations strongly encourage staff not to have sexual relationships with anyone affected by a humanitarian emergency. Such relationships make humanitarian action seem less honest and credible.
- If a humanitarian worker is worried or suspects that anyone in their organization or another aid organization may be breaking humanitarian rules on sexual conduct, they must report it, following procedures set up by their agency.
- Humanitarian workers must create and maintain a work environment, which prevents unacceptable sexual behaviour and encourages staff to behave as set out in their codes of conduct. All managers are responsible for supporting and developing systems, which maintain this environment.

² https://interagencystandingcommittee.org/system/files/rules_on_sexual_conduct_for_humanitarian_workers_-_plain-language_english_0_0.pdf

3. DEFINITIONS AND ABBREVIATIONS

ABUSE

Abuse is when a person is being harmed by another person or group whether physically, sexually or emotionally, whether intentionally or through neglect.

CHILD

In accordance with Article 1 of the United Nations Convention on the Rights of a Child the definition of a child is “Every human being below the age of 18 years”.

SGBV

Sexual and gender-based violence (GBV) refers to any act that is perpetrated against a person’s will and is based on gender norms and unequal power relationships. It encompasses threats of violence and coercion. It can be physical, emotional, psychological, or sexual in nature, and can take the form of a denial of resources or access to services. It inflicts harm on women, girls, men and boys.³

SEAH

To describe the meanings of SEAH the UN definitions are used:⁴

- **SEXUAL EXPLOITATION:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another. Under UN regulations, it includes transactional sex, solicitation of transactional sex and exploitative relationship.
- **SEXUAL ABUSE:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It should cover sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse.
- **SEXUAL HARASSMENT:** A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.

SURVIVOR/VICTIM

The term survivor refers to a person who has been a victim of SEAH. The term victim is more often encountered in legal and medical contexts. WeWorld is driven by a survivor-centred approach, hence the usage of the term ‘survivor’ is highly encouraged.

³ <https://www.unhcr.org/sexual-and-gender-based-violence.html>

⁴ <https://www.gov.uk/guidance/safeguarding-against-sexual-exploitation-and-abuse-and-sexual-harassment-seah-in-the-aid-sector>

VULNERABLE ADULTS

Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or who, based on their gender, mental or physical health, age, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

Additional definitions can be found in Annex II.

4. CORE PRINCIPLES

ZERO TOLERANCE ON SEAH

WeWorld does not tolerate any form of SEAH, and will not knowingly engage anyone to any capacity who might pose a direct risk to children, and vulnerable adults.

NON-DISCRIMINATORY

WeWorld respects and treats people with dignity regardless of their nationality, culture, ethnicity, gender, religious or political belief, socio-economic status, family or criminal background, or physical or mental health.

'DO NO HARM'

WeWorld is committed to mainstreaming the 'Do No Harm' principle in its operations. The "Do No Harm" principle requires humanitarian organisations to strive to minimize the harm they may inadvertently cause through providing aid, as well harm that may be caused by not providing aid (such as adding to tensions with host communities). Across the globe, WeWorld aims to create synergies with communities, partners and authorities alike to better understand the local context, and the impacts of its interactions in order to minimise the risks of causing harm.

SAFE PROGRAMMING

It is of utmost importance that all activities are carefully designed and implemented by taking into consideration potential risks and threats and by minimising these as much as possible. WeWorld takes proactive measures at every stage of project implementation to avoid causing harm inadvertently whilst mainstreaming best practices.

ACCOUNTABILITY AND TRANSPARENCY

WeWorld ensures that the PSEAH Policy is implemented and adhered to, its implementation is monitored, and reviewed on a regular basis, considering feedbacks received.

When a suspected case of abuse is reported action will be taken promptly by following reporting procedures, recording all information. Every report is taken seriously.

SHARING RESPONSIBILITY

When implementing development and humanitarian projects in collaboration with institutions or partner organizations that do not have a Policy on PSEAH, WeWorld will ensure that they agree to adopt WeWorld PSEAH Policy for the duration of the project.

DATA PROTECTION AND CONFIDENTIALITY

All WeWorld personnel are required to maintain confidentiality and to comply with data handling processes, such as collecting, storing, transmitting and destroying data. Information can only be shared on a need-to-know basis⁵.

It should be noted however, that sharing of information might be necessary if it is in the best interest of the individual or if it is required by statutory bodies.

CAPACITY BUILDING

WeWorld supports capacity-building of families and communities, teachers, health and social workers, medical personnel and others in proximity of children, and vulnerable adults in prevention and protection efforts, including early recognition of abuse and appropriate responses.

5. STANDARDS OF BEHAVIOUR OF STAFF

In addition to the Code of Ethics and Conduct, the following standards of acceptable and unacceptable behaviours must be taken into consideration by all staff and representatives at all times:

DO's

- Respect and promote human rights, treat everyone with respect and dignity and without discrimination of any type;
- Behave ethically, use appropriate language especially in front of children, and respect people's privacy and dignity;
- Undertake any trainings that is required in relation to PSEAH, actively raise awareness and promote the implementation of this Policy, and uphold the core principles of it;
- Maintain professional relationships with both right-holders and fellow colleagues at all times;
- Create and contribute to fostering a safe environment where people feel able to raise their concerns, anything they have witnessed or experienced;

⁵ According to the WeWorldFoundation Data protocol based on the GDPR EU 2016/679.

- Report any concerns, wrongdoing or breach of this Policy by following procedures detailed in this document. Keep in mind that individuals are not obliged to report their own experiences.
- Seek advice if you have concerns or in doubt.

DON'T's

- Develop sexual relations, have sex or engage in any sexual activities with minors under the age of 18 regardless of whether she/he gives consent. Mistaken belief of age is not a defence;
- Develop sexual relations, have sex or engage in any sexual activities with rights-holders. Developing such relations is strictly prohibited due to its inherent conflict of power dynamics;
- Exchange money, goods, employment or services in return for sex or any sexual activities;
- Take part in any sexually exploitative or abusive activities;
- Bully, harass, sexually harass or discriminate anyone;
- Take advantage of power dynamics for sexual gains or any other reasons;
- Give preferential treatment to anyone, for example by paying more than desirable attention or by giving excessive gifts.

The above lists are not exhaustive. Staff and representatives should consider all behaviours and actions, which may negatively affect others, and violate Human Rights.

Additionally, in line with the organisation's commitment to protecting people, all employees and representatives are required to adhere to this Policy even outside work. Therefore, actions that contradict the core principles outlined hereby will be considered a violation of this Policy.

Finally, remember that no matter how well intended your actions are, someone may misinterpret them.

6. PREVENTION

WeWorld is committed to creating and maintaining an environment where human rights are respected and promoted.

AWARENESS RAISING

It is essential that all WeWorld staff, volunteers, as well as contractors, representatives, and communities are made aware of the PSEAH Policy and know how to raise their concerns of suspected abuse. All new staff are introduced to the PSEAH Policy upon entering into contract with WeWorld. Considerations should be applied when raising awareness in different cultural contexts and especially among children and vulnerable adults.

TRAINING

All staff must read and acknowledge this Policy. WeWorld Foundation commits itself to conduct periodical trainings in relation to this Policy to adequately inform the staff, raise their awareness and enhance their capacity in preventing, and dealing with possible SEAH cases in the most appropriate way, as described in this document.

In addition, country offices must organise refresher trainings/workshops on safeguarding children, and on protection from sexual exploitation, abuse and harassment.

RISK ASSESSMENT

Risks assessments are conducted in order to identify risks throughout the organisation's operations. WeWorld endeavours to reduce these risks to a bare minimum and is committed to mainstreaming best practices. Before launching and throughout its cycle, projects are evaluated and monitored to ensure that all activities are in line with the core principles of the PSEAH Policy. Practices and policies of stakeholders are examined prior to forming a partnership to ensure that they are committed to child safeguarding and to the prevention of SEAH.

VISITORS

Visitors to WeWorld programmes are expected to uphold the standards of the PSEAH Policy, as well as the Child Safeguarding Policy, and the Code of Ethics and Conduct of WeWorld at all times. All visitors are required to be familiar with and have a sound understanding of the policies and the Code of Ethics and Conduct in advance of their visit.

FOCAL POINT

Every country office, as well as the Headquarters, has an appointed Safeguarding Focal Point.

The Safeguarding Focal Point is an individual identified among the staff members, and at least one Safeguarding Focal Point (SFP) is appointed in each country where WeWorld operates with its own offices and staff. The specific responsibilities of the SFP are defined in the terms of reference that must be drafted together with the appointment. In any case and as a general rule, the SFP promotes and facilitates the application of this policy and related procedures and their implementation at a local level, contributes to awareness-raising and training activities on safeguarding issues and is generally the person who can be involved in the analysis of risks and/or problems related to safeguarding, situations of exploitation, abuse or harassment, referring them and submitting them, where applicable, to the QLC - Quality, Legal & Compliance Unit at headquarters as the person appointed and entrusted to handle whistleblowing and the possible investigation process.

The SFP within each country is a figure involved in the management of reporting mechanisms, and/or FCM⁶ established at the individual country or project level.

In the event that the SFP receives a report of a violation of this policy committed by WeWorld staff or by third parties affiliated⁷ with WeWorld in the performance of its activities, the SFP is required to inform the QLC Unit without delay, using the channels provided, so that the case can be dealt with.

SAFE RECRUITMENT

WeWorld takes great responsibility and all necessary steps to ensure that potential new employees are screened in order to identify any concerns or risks that the individual might pose to children, and vulnerable adults or otherwise. The following measures are in place to comply with safe recruitment standards:

- **Interview:** Questions should be designed to help identify any protection concerns.
- **Reference checks:** Candidates are required to supply the names and contact details of referees from previous employers whom can be contacted regarding the suitability of the candidate to work with children, and vulnerable adults.
- **Declaration Form:** All new employees are required to sign a Declaration, whereby they confirm, amongst the other things, that there are no concerns regarding their suitability to be around and work with children, and vulnerable adults and that they have provided the details of any previous issues in connection with safeguarding or protection concerns.
- **Police Vetting:** Depending on the sensitivity of the role, candidates may be required to submit criminal record checks.

INFORMED CONSENT

No pictures, videos or any other forms of audio-visual material portraying rights-holders can be taken without having previously obtained their informed consent. If the right-holder is a minor, the child's parent/s or legal guardian/s must give consent. Informed assent should be sought from the child herself/him.

Consent and assent must be informed, voluntary and unambiguous.

- **Voluntary:** right-holders must be given the genuine freedom of choice to give or refuse their consent, without providing any further explanation and without any detrimental consequences in the treatment given to them by staff or otherwise negatively affecting their access to assistance.
- **Unambiguous:** right-holders must express their consent in an explicit, univocal and affirmative manner. Consent must not be in any ways implied.
- **Informed:** right-holders must be informed about the purposes and the usage of the images and/or video captured. This information must be provided in a language they are able to easily understand, in age-appropriate, clear, and jargon-free terminology.

⁶ Feedback and complaints mechanisms established at Country Level in each project /programme.

⁷ Affiliated entities are defined as partners, consultants, suppliers, or any other entities that directly or indirectly, permanently or temporarily, paid or unpaid, establish relationships with WeWorld.

SOCIAL MEDIA

WeWorld ensures that its social media platforms are used safely, and that no sensitive information is shared about right-holders that could reveal their identity and compromise their safety whenever posting images and/or stories from the field.

Additionally, all WeWorld staff must exercise precaution and be mindful when posting information regarding their work on private social media accounts. Staff and representatives are not allowed to interact with right-holders on any social media platform.

VISUAL IMAGES AND WRITTEN CONTENT

Consent must be sought the rights-holders before they are photographed, filmed and/or interviewed. If the right-holder is a minor consent must be given by the child's parent/s or caregiver/s before the child is photographed, filmed and/or interviewed. Assent from the child herself/himself should be also sought in advance. The consent should provide information on how the material will be used, for what purposes, how and where the information is stored and for how long.

Right-holders must be portrayed at all times in a dignified and respectful manner and never in a submissive and vulnerable way. Children should be adequately dressed. Whenever working with children there must be at least two adults present.

WeWorld will not share images, videos and interviews/stories of right-holders that could reveal identifiable information. For example, only first names can be used, if necessary real names will not be used at all. Derogations will apply in the case of Child Sponsorship Programmes, for which a special protocol in terms of images and personal information regarding children is applied.

7. REPORTING AND RESPONDING

DUTY TO REPORT

All WeWorld personnel, including volunteers have a duty to report any concerns, allegations or suspected incidents of SEAH. Reporting can be done by various methods described in the reporting procedures.

It rests upon the choice of the complainant whether or not she/he wishes to make a report about something they experienced themselves.

Any reported allegations of SEAH by WeWorld personnel will be investigated and appropriate actions will be taken. WeWorld will support the complainant and maintain the confidentiality.

REPORTING

The following steps should be taken into consideration when reporting concerns and suspected cases of SEAH.

→ **WHO?** Anyone who has concerns over the well-being of a child, or a vulnerable adult, or have experienced themselves SEAH, can raise their concerns. However, consent should be sought from the affected person/s prior to reporting.

→ **WHAT?** Any fact, event or behavior that could potentially or hypothetically constitute a violation of this policy, related to suspected or confirmed cases of sexual exploitation, abuse or harassment, whereby the alleged perpetrator is a member of staff, or an individual associated with WeWorld for the purpose of carrying out its activities.

→ **WHEN?** Reporting should take place with no delays, as soon as possible and feasible.

→ **TO WHOM?**

- Any report must be made using the WeWorld channel set up for this purpose, through access to the platform available at the following link <https://whistleblowersoftware.com/secure/WeWorld> and alternatively also by means of a QR code available on the Foundation's website and in its offices. The platform guarantees the confidentiality of the person making the report, the persons involved in or named in the report, as well as the content and documentation relating to the report, and protection from retaliation.

Alternatively, the report can be made to the Safeguarding Focal Point, which will necessarily report it to the QLC Unit at headquarters if it concerns violations committed by WeWorld staff or its associates. The report can also be made to the line manager, if for any reason it is not possible to contact the Safeguarding Focal Point or use the dedicated platform. The Safeguarding Focal Point, due to their professional competences, represents a further guarantee on the operation and application of the current policy at Country level, it does not compromise in any case the application of the whistleblowing policy and the possibility for anyone to refer directly to the QLC Unit, if necessary.

- Reports can also alternatively be addressed to the QLC Unit directly, as the entity in charge of handling irregularities and any related investigative proceedings. The Unit can be contacted by writing to compliance@weworld.it, or by requesting a direct meeting. Even in this eventuality, the utmost confidentiality of the person of the whistleblower, of the persons involved in or referred to by the report, as well as of the content and documentation related to the report itself and protection from retaliation will be guaranteed.

→ **HOW?** Reports through the dedicated platform can be made either in writing or orally, and either anonymously or confidentially at the choice of the complainant. The complainant is progressively updated on the status of the report. Alternatively, reports can be made orally, in person, by e-mail to the Safeguarding Focal Point or the QLC Unit. A reporting format is available and is attached to this policy. Whichever form is used confidentiality and discretion should be exercised at all times (for example, if reporting via telephone ensure that no one can hear what is being said).

The QLC Unit has the overall supervision for the implementation and monitoring of the PSEAH Policy, and other Organisational Policy. Therefore, it rests upon the QLC Unit as formally appointed entity to assess the allegations concerning WeWorld's staff or associates behaviors, to appoint the person/s to investigate the allegations, and to inform the Managing Director of WeWorld and the Board of Directors whom, will carry out formal disciplinary procedures provided the allegations are substantiated.

Investigation must be initiated as soon as the Reporting Form is submitted to the QLC Unit after a first screening aiming at ascertaining the investigation procedural feasibility of the investigation.

It should be noted that all concerns are considered allegations until evidence proves otherwise, therefore confidentiality must be maintained by all parties involved in the reporting throughout the procedures and beyond.

The flowchart of the Reporting and Responding Procedures can be found in the Annexes.

PROTECTION FROM RETALIATION

WeWorld does not tolerate any negative behaviour or action towards anyone who raises concerns of SEAH, whether they are the survivors, witnesses or whistle-blowers. Any threatening or intimidating action, whether verbal or physical, will be subjected to investigation, which may result in disciplinary action or even in the dismissal of the staff member carrying out reprisals.

KEEPING INFORMED THE SURVIVOR

In addition to offering full support and assistance to the survivor, they will be provided information on the progress of the investigation regularly, and will be informed on the details of the outcome.

HISTORICAL ALLEGATIONS OF ABUSE

Whether an abuse has happened recently or in the past, it has to be emphasised that there are no time constraints for reporting these historical cases.

BARRIERS TO REPORTING ABUSE

Some people may have concerns about sharing suspected cases of SEAH for various reasons. For example they may fear that they were wrong, that reporting the case might worsen the situation for the complainant, or they might be put off reporting suspicions over fears about repercussions on for them personally. However, WeWorld takes each and every allegation seriously, and strongly encourage for people to speak up as soon as they became aware of suspected cases of SEAH.

UNFOUNDED ALLEGATIONS

If a concern is raised in good faith and it is not confirmed by investigation, no action will be taken against the reporting individual.

If, however, an allegation is deliberately false, misleading and malicious, appropriate or legal action will be taken against the reporting individual.

8. PROTECTION OF VICTIMS/SURVIVORS

WeWorld facilitates survivors of sexual exploitation and/or abuse access to psychosocial, medical and legal support either by providing them with direct services or referring them to relevant service providers present at Country level, including UN agencies. WeWorld ensures the survivor will be supported throughout legal proceedings by providing information of her/his own rights in respect to local legislation, customary law and international conventions. If the survivor works for the organization she/he shall be offered the option of transferring to another office or the possibility of suspending her/his work whilst receiving their salary.

This should be done respecting the wishes and needs of the survivor whilst also taking account of confidentiality and cultural sensitivities. Ensuring survivor safety should be the paramount principle to be actively upheld throughout the whole process.

9. RESPONSIBILITIES

Across the organisation, every personnel, regardless their position and the type of their association with WeWorld are required to adhere to this policy at all times, including outside working hours and during the periods of leave. Additionally, all staff must confirm in writing their adherence to the principles and values contained in the Code of Ethics and organisational policies, upon entering into contract.

MANAGERS

Managers at all levels are responsible to promote awareness and understanding of the Policy among all personnel (including volunteers) and that all personnel have the knowledge

and skills to support the mainstreaming of the Policy. Additionally, managers are required to mainstream good practices and to create an environment where individual can raise their concerns without fear of reprisal.

STAFF AND VOLUNTEERS

It is every staff and volunteers' due responsibility to understand, advocate and apply the Policy to their work. If allegations or incidents of abuse are raised it is important for staff and volunteers to follow correct procedures of reporting.

10. IMPLEMENTATION, MONITORING AND REVIEW OF THIS POLICY

Everyone at WeWorld, regardless of their status has the responsibility in the implementation of the PSEAH Policy, based on the principles outlined in this document, and according to his/her role within the Organisation.

The implementation of safeguarding standards, and compliance with this Policy is monitored on an ongoing basis. Feedback from staff, as well as communities and stakeholders is highly encouraged in order to improve procedures. WeWorld Foundation also provides an internal channel for reporting, managed by the Quality, Legal & Compliance, for reporting the improvements of this policy.

This Policy is subject to review on a regular basis, at least once every five years by the Board of Directors.

ANNEX I-ADDITIONAL DEFINITIONS

BULLYING

Bullying means the deliberate ill-treatment of a person by displaying dominating, aggressive and/or demeaning behaviour towards another person, such as name-calling, threatening, harassment, causing physical harm, spreading rumours, and making rude gestures. In most cases bullying occurs repeatedly over a period of time. Bullying can happen anywhere in many forms, including online.

FALSE IMPRISONMENT

A child or vulnerable adult may be falsely imprisoned by an individual in a confined space that restricts movements with the intention of causing physical injuries and/or emotional distress. In addition, false imprisonment can also result in deliberately neglecting the child or vulnerable adult by failing to meet their basic needs whilst imprisoned.

GROOMING

Grooming, including online grooming happens when an individual befriends a child or a vulnerable adult for the purposes of sexual exploitation, sexual abuse or trafficking.

HARMFUL TRADITIONAL PRACTICES

Although culturally may be accepted, several traditional practices are considered harmful, both physically and mentally. Such practices include female genital mutilation or cutting, witchcraft, and early forced marriage.

NEGLECT

Neglect is the ongoing, persistent failure or deliberate denial to meet a child's or a vulnerable adult's basic needs, including water, aliment, clothing, shelter, education, emotional support, medical care and protection. It should be noted that neglect can be unintentional, for example when a parent or carer does not have the means to provide for the child or vulnerable adult adequately due to poverty.

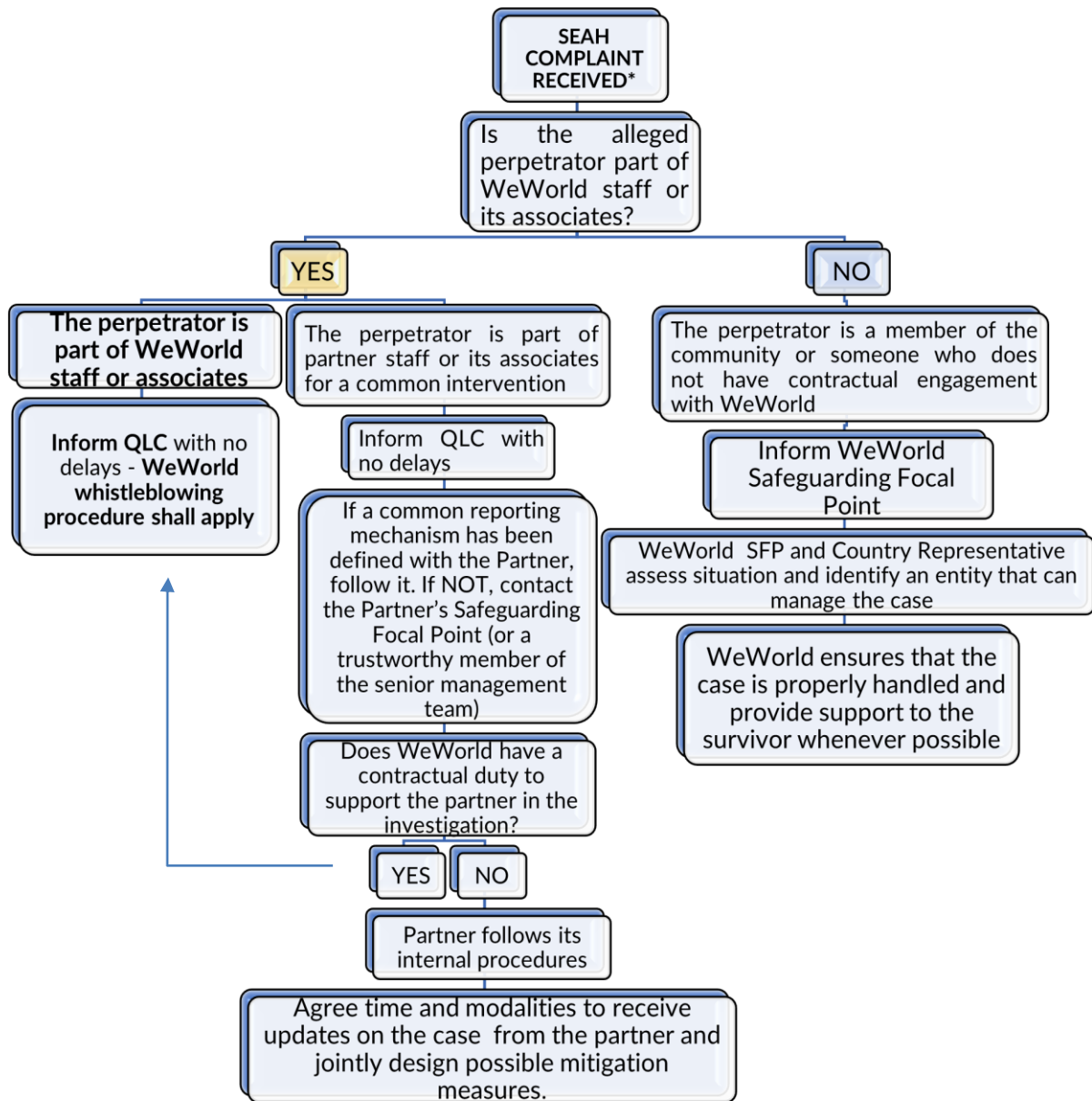
TRAFFICKING

Trafficking of children or adults refers to the illegal recruitment, transportation of children - either by force or by tricking them into it - for the purpose of forcing them into slavery, prostitution, forced labour, involuntary domestic labour, debt bondage, serving as soldiers or any other form of exploitation.

TRANSACTIONAL SEX

This term refers to the exchange of monetary reward, gifts and other goods, employment in exchange of services of sexual nature.

ANNEX II – HANDLING REPORT FLOWCHART



ANNEX III – REPORTING FORM

Please note that before making a report, it is necessary to carefully read the Whistleblowing Procedure adopted by the Organisation, in particular:

- who receives the report and how it is handled
- what protections are provided for the whistleblower by the Organisation.

It is also necessary to read the privacy policy enclosed in this form.

Finally, please note that the report is only investigated and verified if it is well substantiated and documented.

For further information, please go to this link <https://whistleblowersoftware.com/secure/WeWorld>

Subject/title of the report

Complainant data - *in case of a confidential and non-anonymous report only

Full name: _____

E-mail address: _____

City: _____

Country: _____

Job position in the Organisation or relationship with the Organisation (in the case of a person who does not have a working relationship with We World): _____

Contact details for subsequent contact between the Manager investigating on the case and the complainant, in the case of a confidential and non-anonymous report.

Indicate the channel through which you can be contacted and receive updates on the case.

- E-mail: _____

- Address: _____

Where were the reported facts committed? (please indicate the specific location, clearly identifying the Country, City/Town/Village) and nearest WeWorld office

Indicate the exact location

Indicate the nearest WeWorld Country Office

When were the reported facts committed? (please indicate a date or a timeframe)

Date /timeframe: _____

Please select the category that most suits your report

- Abuse of power
- Breach of law
- Child abuse
- Conflict of interest
- Environmental safeguarding
- Fraud or Corruption
- Other (such as discriminatory behaviors)
- Sexual exploitation, or abuse (SEA)
- Sexual harrassment
- Terrorism
- Unethical behavior
- Violations of internal rules and procedures

What happened? Please describe the facts you are reporting, who committed them and how. It is important to include all details you have and to be as precise as possible, by indicating the source of any allegation or information. You can also attach any file - e.g documents, pictures, recordings - including specific evidence to the reported case.

Provide a description of the facts

Is there any evidence (e.g documentation, pictures, recordings) you wish to share to support your report? Please attach your files

Are there any other people informed about or witnesses to the facts you are reporting?

- Yes
- No
- I do not know

In case you answered YES, can you provide name or role/position or any other relevant information you may have?

Do you know if the facts that you are reporting have previously been reported to other authorities or to anyone inside and or outside WeWorld?

- Yes
- No
- I do not know

In case you answered YES, please provide details.

Comments/any additional remark or anything you wish to add

- I confirm to have read the privacy policy (annexed to this form)

- I confirm to the best of my knowledge that my statement is true. I am informed that whistleblowing reports made with knowledge of their falsity or with wilful disregard of their truth or falsity shall constitute misconduct and may lead to disciplinary sanctions or more serious legal consequences. (Required)

Signature (optional, in case of confidential report only)



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