

# SAFEGUARDING POLICY

**CBM Italia**

October 2023



***CBM Safeguarding Policy***

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## DEFINITIONS

|                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Safeguarding (of children and adults)</b>        | A set of policies, procedures, and practices designed to ensure that no harm comes to individuals as a result of contact with an organization's programs, activities, or personnel, and that any harm that does occur is handled appropriately.                                                                                                                                                                                                                                                                                                                                                |
| <b>Child</b>                                        | A person under the age of 18.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Adult</b>                                        | A person 18 years of age or older.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Adult At Risk (Vulnerable Adult)<sup>1</sup></b> | <ol style="list-style-type: none"> <li>1. Any person 18 years of age or older who may be at risk of violence or abuse due to dependence on others or reliance on others for services, basic needs, or protection.</li> <li>2. An adult may also be at risk or vulnerable when another person abuses their position of authority or trust to control, coerce, manipulate, or exploit them or to commit any other form of violence.</li> <li>3. An adult may also be at risk if their decision-making capacity is impaired and/or they lack the necessary support to make a decision.</li> </ol> |
| <b>Consent</b>                                      | Consent is the agreement of someone unable to provide legal consent to participate in an activity. For example, to work with children who are unable to give consent, the consent of a parent or legal guardian and the consent of the child are required.                                                                                                                                                                                                                                                                                                                                     |
| <b>Assisted decision-making</b>                     | <p>This involves assisting or supporting an individual who must make an autonomous decision by providing them with the necessary tools, without making the decision for them.<sup>2</sup></p> <p>The same term is used when a person with impaired decision-making capacity appoints someone to assist them or to make a joint decision.</p> <p>The term also indicates that a person has appointed another to represent them for the purpose of making a decision.<sup>3</sup></p>                                                                                                            |
| <b>Child Abuse</b>                                  | Child abuse consists of any action that individuals, institutions, or processes take or fail to take that causes direct or indirect harm to children or that impairs their prospects for a safe and healthy transition to adulthood.                                                                                                                                                                                                                                                                                                                                                           |
| <b>Child protection</b>                             | Programs, projects, and advocacy measures aimed at protection constitute a programmatic approach that includes the prevention of and response to violence, abuse, maltreatment, and exploitation of children. It generally addresses risks and issues caused externally to the organization, while <i>safeguarding</i> addresses those caused internally.                                                                                                                                                                                                                                      |
| <b>Confidentiality</b>                              | For the purposes of this policy, confidentiality means that information regarding each case will be shared only when necessary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Free and Informed Consent</b>                    | The voluntary agreement given by an individual who has the capacity to provide consent and who makes a free and informed choice.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Note on Legal Capacity</b>                       | In accordance with Article 12 of the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD), CBM recognizes that persons with disabilities have the right to be recognized as persons before the law and to enjoy legal capacity on an equal basis with others in all aspects of life.                                                                                                                                                                                                                                                                                  |
| <b>Risk</b>                                         | Risk means the possibility that something might go wrong (an accident or a malicious act), or the possibility that an action will have a negative consequence.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Risk Assessment</b>                              | Risk assessment is a method for identifying potential risks.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Risk management</b>                              | Risk management means identifying potential risks and implementing measures to prevent, minimize, and/or mitigate those risks.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Accident related to safeguarding</b>             | A <i>safeguarding</i> incident is a situation in which CBM's <i>Safeguarding Policy</i> or CBM's Code of Conduct regarding violence against persons has been violated or there is an allegation of such a violation.                                                                                                                                                                                                                                                                                                                                                                           |



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# INTRODUCTION

**CBM is an international organization committed to improving the quality of life for people with disabilities in the world's poorest communities. Guided by its values and drawing on over 100 years of experience, CBM works to break the cycle linking poverty and disability, collaborating with local and national partners to create a society for all. CBM Italia is part of the CBM network.**

## Introduction to Risks

CBM works in development contexts and humanitarian situations where women, men, girls, and boys with disabilities may be at greater risk than the rest of the population. CBM notes with concern that children with disabilities face a risk of violence three times higher than children without disabilities.<sup>4</sup> Adults with disabilities—especially women—are also at high risk of violence if protective measures are not put in place.

CBM believes that every girl, every boy, every woman, and every man has the right to protection, regardless of who they are or whether or not they have a disability.

It is CBM's responsibility to take all necessary measures to ensure that all children and adults who come into contact with its activities and programs (project participants) are protected to the greatest extent possible. These protective measures also apply to CBM employees and partners.

## Purpose of the Policy

The purpose of the *Safeguarding Policy* is to regulate the operation of CBM's programs, activities, and work of CBM so that children and adults with whom the Organization comes into contact do not experience any form of violence, abuse, or harm.

## To Whom This Policy Applies

This *policy* applies mandatorily to all CBM Italia staff (employees and contractors), *regional hubs*, and national offices (Country offices/ desks). The *policy* also applies to CBM representatives such as members of the Board of Directors, consultants, external collaborators, project visitors, goodwill ambassadors, interns, and volunteers (hereinafter referred to as "CBM representatives").

CBM works closely with its partners and expects them to adhere to high safeguarding standards based on their own specific Safeguarding Policies, the United Nations Convention on the Rights of the Child, and the United Nations Convention on the Rights of Persons with Disabilities.<sup>5</sup>

<sup>4</sup> Hughes et al., "Prevalence and Risk of Violence Against Adults with Disabilities: A systematic review and meta-analysis of observational studies," *Lancet*, April 28, 2012, doi: 10.1016/S0410-6736(11)61851-5.

<sup>5</sup> Equally important are the International Covenant on Economic, Social, and Cultural Rights and the Convention on the Elimination of All Forms of Discrimination against Women. The link to the International Covenant on Economic, Social, and Cultural Rights is: <https://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>. The link to the Convention on the Elimination of All Forms of Discrimination against Women is: <http://www.un.org/womenwatch/daw/cedaw/cedaw.htm>





# PREVENTIVE MEASURES

**Safeguarding systems and procedures are designed to protect against the risk of or actual acts of violence, mistreatment, abuse, and exploitation, including sexual exploitation, abuse, and harassment (SEAH)<sup>6</sup>. Therefore, this section of the policy describes in detail the measures that CBM staff and representatives should take to reduce such risks.**

## Safeguarding Training

Safeguarding training sessions are mandatory and available to all CBM staff. Each employee should have completed at least one full safeguarding training session and should attend refresher modules.

## Safer Planning and more accurate risk assessment

In order to promote access to services and reduce all types of risks to the people with whom CBM works, it is necessary for CBM staff and representatives to understand the safeguarding risks that may sometimes be inherent in project work so as to prevent incidents before they occur.

The risk assessment related to projects and organizational aspects will take into account the specific protection risks for girls, boys, women, and men with disabilities.

Project managers will ensure that the protection risk assessment is conducted in a participatory and comprehensive manner when defining and implementing projects and activities.

The risk assessment must identify risks and barriers and document the measures taken to reduce or eliminate them. Project managers must also provide adequate budget estimates/funding to the protection needs of their projects along with the project funding application.

It is important to note that conservation risks may vary depending on the type of activity, the context, and the people involved. A risk assessment template is provided in Appendix 5.

## Special Safeguards for Health- Related Programs

1.Managers and implementers of CBM health-related programs must make every effort to ensure that only best practices are followed and that potential risks

to project participants and patients are minimized.

2.CBM has developed **mandatory** minimum procedures for performing surgical procedures on children under general anesthesia (Appendix 7). These are mandatory life-saving measures that must be followed by all CBM partners performing pediatric surgical procedures under general anesthesia.

3.Health data, including clinical images of patients, must always be protected. Such data may be collected, shared, and published only with prior consent.

## Working with Partners

Safeguarding is an integral part of CBM's commitment to partnership, and CBM expects its partners to or develop, within a set timeframe, a Safeguarding Policy or similar policies, in line with the United Nations Convention on the Rights of the Child and the United Nations Convention on the Rights of Persons with Disabilities.

CBM also expects its partners to adhere to the following points:

1.All partners and second-tier partners should develop inclusive project design approaches for all stakeholders. Partners working with children should develop child-friendly methods for working and implementing projects.

2.Partners should have effective *feedback* mechanisms accessible to project participants and colleagues. Women, men, girls, and boys should be actively and seriously encouraged to participate in the design, monitoring, and evaluation of activities that affect them.

3.Women, men, girls, and boys should be actively and strongly encouraged to participate in the design, monitoring, and evaluation of activities that affect them.

<sup>6</sup> Sexual Exploitation, Abuse, and Harassment (SEAH). Refer to CBM's Code of Conduct for further details on SEAH, including examples.

4. Partners should inform project participants and colleagues about how to report suspected cases of harm and the subsequent measures to be taken.

5. Partners should ensure that a project risk assessment is conducted and that protocols are in place for managing risks. Additionally, they should ensure that the necessary funds for safeguarding are included in the project budget.

6. If a serious safeguarding incident (violence, abuse, or exploitation) occurs within a partner organization:

- CBM requires that it be informed as soon as possible upon becoming aware of a suspected case or an actual incident—and no later than 48 hours thereafter—by the Country Director or the Safeguarding Focal Person regarding the non-confidential details of the case and the partner's response. Responses may include medical, psychological, and legal measures taken in the best interests of the child(ren) or adults involved; investigations into the incident; and preventive measures or actions taken with the family and the local community.
- CBM will offer its advice or consult with local experts if the partner requests it.
- If the partner fails to take adequate and timely action or ignores the incident, CBM will provide specific guidance on how to proceed. As a last resort, CBM reserves the right to withhold funds from the partner until appropriate measures are taken or to terminate the partnership agreement.

## Safeguarding in Humanitarian Activities

Humanitarian activities carry higher risks of violence, abuse, and exploitation. These risks are particularly high for girls, boys<sup>7</sup>, women with disabilities, and older adults.

Article 11 of the Convention on the Rights of Persons with Disabilities emphasizes the obligation to ensure the protection and safety of persons with disabilities in situations of risk, including armed conflicts, natural disasters or other humanitarian emergencies. It is therefore important to integrate the issue of safeguarding into all phases of CBM's humanitarian work — during the natural disaster alert phase, the response phase, and the early recovery phase — so that the duty to provide assistance can be fully fulfilled.

CBM requires that this *policy* be adopted in development and humanitarian assistance projects.

It is also important that this *policy* be implemented in national projects as a means to ensure readiness to respond to humanitarian crises, thereby laying a solid

foundation and establishing clear parameters for action within which CBM's humanitarian staff and its partners can operate.

Along with other provisions of this policy, the following are specific measures through which CBM intends to reduce the risks of violence in the context of humanitarian activities:

- Safeguarding risk assessments will be integrated into the planning of humanitarian interventions, budgeting processes, and operational procedures — such as the mobilization of additional staff in the event of an emergency response and the selection of new partners.
- All new CBM staff and representatives of partners involved in the humanitarian response receive a detailed briefing on safeguarding at the start of their assignment, and existing staff and involved in the humanitarian response receive a refresher briefing at the start of the humanitarian response.
- More in-depth training and refresher sessions on safeguarding will be provided as part of humanitarian training programs and tailored to different levels; for example, for partners, managers or coordination teams, field operations teams, volunteers, community representatives, and organizations of people with disabilities. Obligations regarding the protection of children and adults are included in contracts with new partners, secondary partners, employees, and representatives.
- Feedback and complaint reporting mechanisms are communicated and made as accessible as possible, and every complaint is addressed as quickly as possible.
- Safeguarding measures during humanitarian activities are documented and reported as an integral part of periodic reports.
- In the event of incidents related to *safeguarding*, the procedures established by CBM for managing such incidents are implemented.

## Research, Media, and Communication

It is important that ethical and safeguarding principles be followed in research activities, media relations, and communication efforts to ensure that all children and adults are portrayed with dignity, that their participation does not constitute exploitation, and that photographs and related material are not used for purposes other than those agreed upon.

The following protective measures should be implemented before initiating research activities, interactions with the media, or communication activities or campaigns:

<sup>7</sup> UNICEF. "Including Children with Disabilities in Humanitarian Action." (Link: <https://sites.unicef.org/disability/emergencies/protection.html>)



1. The project manager and other stakeholders should review the research methodologies to assess safeguarding risks and ensure alignment with CBM's other policies and procedures.

2. The contracts and job descriptions for consultants, journalists, photographers, researchers, volunteers, and other stakeholders should be based on the most recent versions of the templates, policies, and principles validated by CBM, as well as CBM's Code of Conduct. They should also specify how the information collected will be used and shared. This should be consistent with the consent forms used to indicate willingness to participate.

3. All individuals asked to provide consent will be informed that participation in communication or research activities is voluntary and that they may withdraw their participation at any time without consequences.

4. Everyone involved in collecting stories or other information should be trained on CBM's Safeguarding Policy and should sign a statement confirming their adherence to the policy and CBM's Code of Conduct.

5. In interviews with children, the "two-adult rule" should be followed.<sup>8</sup> For adults, it should always be possible to choose to have the support of a trusted person during the interview.

### Guidelines for Photographs

Although sensitivities regarding these issues vary by context, photographs may be used in countries other than those where they were taken. Therefore, the following rules apply when taking photos of children for CBM's use:

1. Children and adults should be portrayed in their real social context. Do not attempt to alter it to fit a different narrative.

2. Images, stories, and messages about boys, girls, women, and men must portray the subjects in a respectful and dignified manner, depicting them as partners in the development process.

3. In some countries where CBM and its partners are active, it is normal for children not to be fully clothed at all times. For this reason, the following guidelines should be followed when filming or taking photographs:

<sup>8</sup> This means that another adult is present, either visible or easily accessible.

- Younger children, such as infants, should have at least their lower body covered;<sup>9</sup>
- All other children must wear clothing that covers both the lower and upper parts of their bodies;
- Clothing must be appropriate for the child's living environment and the international context in which the image will be used.

4. Completed consent forms will be properly stored, preferably also in digital form.

5. The updated version of the list of partners and consent forms is available at the following link: <https://picture.cbm.org/?c=7230&k=90187f3153>.

6. Photographs, materials, and personal information regarding children will be stored in a secure database with restricted access, and laws governing the protection of sensitive data will be followed.

7. When publishing the material, the identity and traceability of all children and vulnerable adults will be protected; for example, by using only the first name, providing only a vague geographic indication (state or country), and removing geotags.

8. CBM partners who have given consent for the use of images collected by CBM or its representatives must sign an agreement to comply with the terms of use for which consent was granted.

## Safer Hiring and Contracts

The following guidelines will apply to new hires; while not 100% exhaustive, they help ensure the hiring of suitable candidates and thereby reduce risks:

1. Job Postings — All CBM job postings state that “CBM is committed to the protection of every child and adult who comes into contact with CBM’s activities and programs.”

2. Candidate Screening — Information about candidates must be gathered and reviewed with attention to possible gaps or inconsistencies in their employment history.

3. Interviews — Candidates will be asked specific questions regarding protection, CBM’s Code of Conduct, or working with vulnerable people.

4. Background Checks - CBM will request references from a previous employer. If this is not possible, references will be sought from an academic institution, or references may be requested from a reputable contact and

appropriate within the community.<sup>10</sup> If staff will be working directly with children or adults at risk, or if the hiring process takes place within the European Union, verbal (non-written) references are also required.

5. Additional Checks — Local human resources managers are responsible for conducting additional checks in accordance with local laws and requirements. This includes “proof of good conduct” or “criminal record checks” for specific positions. If these documents are unavailable or unreliable, the Human Resources department may request that candidates provide a signed self-certification of good conduct.

6. All selected candidates must agree to and sign CBM’s Code of Conduct and Safeguarding Policy upon starting employment.

7. Training—Human Resources Managers will ensure that new hires receive safeguarding training within one (1) month and no later than three (3) months after being hired.

## Consultants, External Collaborators, and Contractors

1. Before finalizing a contract, the project manager must verify that all consultants, external collaborators, contractors, and second-tier partners receive information or a briefing on CBM’s Code of Conduct and Safeguarding Policy and on their resulting obligations.

2. All contracts should include a clause stating that the contracting party will sign CBM’s *Safeguarding Policy* and CBM’s Code of Conduct.

## Prevention of Sexual Abuse, Violence, and Harassment, (PSEAH) Prevention of Sexual Exploitation, Abuse, and Harassment)

As explained in detail in CBM’s Code of Conduct, any form of sexual abuse, violence, or harassment is considered unacceptable on the part of any CBM employee or representative and is regarded as a very serious matter.

<sup>9</sup> For this purpose, an estimate of age may be used.

<sup>10</sup> For example: a community leader, a religious leader, a doctor, or a lawyer.

# RESPONSE MEASURES

**Incident management processes will be as accessible as possible to those involved.<sup>11</sup>**

## Jurisdiction in the Case of Internal and External Incidents

Some incidents may be directly attributable to CBM internally (if they involve CBM representatives, programs, or partners), while others may be external (if they do not involve CBM representatives, programs, or partners).

CBM is held responsible for incidents that are directly linked to the organization. Although CBM remains vigilant regarding violence, abuse, or exploitation, in the event that CBM becomes aware of external incidents, these will be reported to the authorities best suited to handle them.

## Reporting Suspected and Alleged Cases of Violence

The following are the options for reporting suspected and actual cases of violence within CBM:

1. Notify the Safeguarding Focal Person.
2. Notify the CBM Country Director.
3. Notify the Regional Security and Safeguarding Advisor.
4. Notify the Global Safeguarding Incident Advisor via email: [safeguarding@cbmitalia.org](mailto:safeguarding@cbmitalia.org).
5. Report them through the program's feedback mechanism.<sup>12</sup>
6. Report them through the anonymous reporting system (whistleblowing) on the CBM website.<sup>13</sup> This procedure does not exempt you from the duty to report criminal incidents to local authorities if necessary in consultation with CBM's local management.

If you need to report any case of violence or abuse via email, we recommend following these procedures, regardless of the severity of the case, to ensure prompt handling:

1. Mark the email as "High Priority."
2. Enter the following in the email subject line: **"ATTENTION! Confidential!"**

## Warning Regarding False Reports

No action will be taken against anyone who, in good faith, reports a suspected case that, following an investigation, proves to be unfounded. However, if it is determined that a CBM representative has knowingly and intentionally filed a fraudulent report, disciplinary proceedings will be initiated.

All reports will be treated and handled confidentially to protect the identities of those involved, in accordance with European Union and national (if applicable) privacy laws.

## Handling Reports from Children or Adults

It is possible that a CBM staff member or representative may witness or become aware of actual or alleged acts of violence, abuse, or exploitation within CBM, a partner organization, or an external entity. The following are guidelines to follow when handling such situations:

1. Always take statements seriously and pay close attention to the details provided.
2. Do not promise to keep the information provided confidential, as it may be necessary to share it with others through one of the reporting options described above if an investigation is opened.

<sup>11</sup> For example, a sign language interpreter for interviews with deaf individuals or large-print materials for people with low vision.

<sup>12</sup> <https://www.cbm.org/about-cbm/reporting-channels-and-safeguarding/>

<sup>13</sup> <https://www.bkms-system.net/bkwebanon/report/clientinfo?cin=3cbm16&c=-1&language=eng>



3. Under no circumstances should you attempt to investigate these reports on your own. Instead, you must forward this information to the Safeguarding Focal Person or the Regional Security and Safeguarding Advisor as soon as you become aware of such a case — and in any event no later than 48 hours thereafter. You may be asked to fill out the reporting form.

## Case Management

When a safeguarding officer (for example, the Regional Security and Safeguarding Advisor) is informed of a safeguarding violation, here are some factors to consider:

1. Does the case violate CBM's policy, the Code of Conduct, or local laws? If not, it is highly likely that it is not serious enough to warrant further action.

2. Is it necessary to report the case to the police or another authority?

3. If the case is serious enough to warrant consideration, does it require further investigation? If so, an administrative investigation must be initiated.<sup>14</sup>

- An administrative investigation may be conducted only by the Global Security and Safeguarding Unit or by a team appointed by it.
  - The purpose of such an investigation is to establish the truth regarding the complaints or allegations. The results of an investigation may confirm, reject, or find the allegations to be unfounded or illegitimate.
  - If the investigation is conducted internally at CBM, the Global Security and Safeguarding Unit forwards the findings to the relevant Regional Hub Director or Country Director for further action.
- Do victims require "support services"? If so, what kind? Can these services be provided directly, or is it necessary to consult a specialist?
- Does this case management mechanism allow for the full participation of all those involved?
- What lessons can the Organization learn from this incident?

4. In cases that are very serious and complex, the Global Security and Safeguarding Unit will request assistance from the Crisis Management Team to manage the case.

5. Upon resolution of a serious case, key stakeholders are informed of the results as appropriate and on a need-to-know basis. The Security and Safeguarding Unit then conducts an "After Action Review" jointly with the key stakeholders.

## Safeguarding Resource and Reference List

Safeguarding Focal Persons are responsible for ensuring that every country office or desk has a designated safeguarding contact and a reference list updated at least every two years. This facilitates and expedites reporting when needed.

## Support for Reporters and Victims

It is well known that those who report incidents and those who are victims of violence may require targeted interventions to support their well-being and recovery.

CBM will do whatever is necessary — given the available resources — to protect them from retaliation and to promote their well-being and safety. This may include consulting specialists in the fields of medical, psychosocial, legal, or other types of support, depending on the victims' needs. They will also be adequately informed of the outcome of the case once the necessary procedures have been completed.

## Support for Incident Managers

Being involved in the management of incidents of this kind can be a highly stressful situation. CBM provides a confidential telephone support service for employees experiencing psychological or emotional issues, such as stress, anxiety, and depression; excessive pressure; problems with work performance; or other similar difficulties. In the event of high-stress incidents, CBM employees are encouraged to use this service, which is also available to deaf individuals.

For serious incidents, it is also recommended to report regularly to the incident management team.

If the services mentioned above are insufficient, employees are encouraged to report this to their supervisor or the local Human Resources manager.

<sup>14</sup> CBM uses the CHS Alliance investigation guidelines: [https://www.chsalliance.org/les/les/Investigation-Guidelines-2015\\_English.pdf](https://www.chsalliance.org/les/les/Investigation-Guidelines-2015_English.pdf)

# GOVERNANCE AND RESPONSIBILITIES

**While safeguarding is everyone's responsibility, managers are tasked with ensuring that this Policy is implemented within their respective areas of responsibility and leadership.**

## Actions to Implement the Policy

### Management Actions

1. Country Directors, Initiative, and Department Managers must integrate safeguarding measures into key internal processes such as: planning, program design and implementation of programs, budget preparation, partner agreements, risk management, hiring, monitoring tools, and reporting.

2. Country Directors must ensure the local implementation of this policy's guidelines in the following ways:

- ensuring the appointment of a suitable individual as the Safeguarding Focal Person in the national office/headquarters, who receives appropriate training and support. Note that it is the Country Director, and not the safeguarding officer, who bears responsibility for the implementation of the Safeguarding Policy at the national level;
- ensuring that all employees, representatives, and partners are informed of this policy and the obligations arising from it. To this end, it may be necessary to use translations or conduct awareness-raising sessions in the local language to make the information more accessible;
- ensuring that their office has a funded and up-to-date safeguarding action plan that is reviewed at least annually. If necessary, safeguarding action plans should take into account collaboration with partners regarding the strengthening of protection systems and practices.

### Management Actions

1. All CBM representatives are required to sign an information and consent form regarding the Code of Conduct in this policy prior to hiring or appointment.

2. The homepage [www.cbmitalia.org](http://www.cbmitalia.org) and all workplaces must display information stating that CBM is committed to safeguarding. Each office must display the contact information for the Safeguarding Focal Person.

3. The Global Security and Safeguarding Unit must collaborate with regional hubs and national offices to monitor the implementation of the policy through periodic safeguarding assessments (including self-assessments).

4. The Global Security and Safeguarding Unit must submit quarterly and annual reports on recorded cases of violence and related developments to CBM leadership at the national, regional, and international levels.

### Policy Review

CBM recognizes its responsibility to continuously monitor and take action to ensure that effective and safe safeguarding practices are in place. For this reason, this policy is reviewed at regular intervals and amended as needed. Suggestions for improving the organization and implementation of the policy may be sent by email to [safeguarding@cbmitalia.org](mailto:safeguarding@cbmitalia.org).

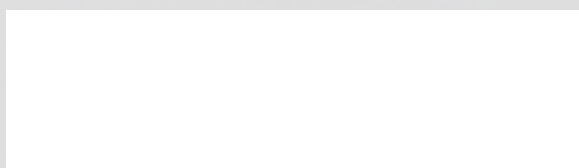


## APPENDIX 1: CBM CODE OF CONDUCT ON SAFEGUARDING

**The primary purpose of the Code of Conduct described below is to protect children and adults who come into contact with CBM. Adherence to this Code of Conduct is mandatory for all CBM employees and representatives. Any violation will result in disciplinary measures, which may include legal action or termination of contracts, if warranted by the severity of the violation.**

### CBM Italy's Safeguarding Code of conduct

I, the undersigned (Name)



acknowledge that I have read and understood CBM's 2023 Safeguarding Policy.

By signing this document, I agree to:

- comply with CBM's Safeguarding Policy.
- take responsibility for complying with the Code of Conduct regarding safeguarding.

**To this end, I commit to:**

- create a culture of openness and mutual accountability in the workplace;
- adhere to the general principles of the UNCRPD by respecting the dignity, individual autonomy, and independence of people; non-violence; ensure that I have the right to be treated fairly and effectively participation and inclusion of people within society; respect differences and accept people with disabilities as part of human diversity and humanity, promoting equal opportunities and equality between men and women, and promoting accessibility and respect for the rights of the people in my community;
- applying the "two-adult" rule when engaging in any activity with children. This means that a second adult (a colleague or the child's guardian/caregiver) must be present or easily reachable nearby. In cases where this is not possible, I will inform my supervisor for the sake of transparency and accountability. Adults should verify that the children are safe from the assistance of a support person if they so desire;

- ensure that physical contact is always appropriate (it is the responsibility of CBM representatives to understand the culture of the contexts in which they work and to know what is considered culturally appropriate behavior);
- use positive and nonviolent methods to communicate with children and adults;
- respect decisions regarding consent to take photos of them, videos, or write stories about project participants;
- protect and handle the personal data of children and adults with care, and ensure that third parties who receive this information from CBM or partner organizations do the same.
- report to the Safeguarding Local Person, the Regional Security and Safeguarding Advisor, or globally, if [safeguarding@cbmitalia.org](mailto:safeguarding@cbmitalia.org), as soon as possible and no later. I promise to receive a report or testimony regarding any suspected incident, allegation, or case of violence, abuse, or exploitation involving CBM employees, its representatives, projects, or activities;
- cooperate with any investigation into cases of violence (including interviews) and provide all necessary information.

**I will commit to not:**

- hold, caress, kiss, cuddle, or touch children in a manner that is inappropriate and/or insensitive to the local culture;
- participate in activities that require close physical contact with project participants beyond professional necessities;
- behave in a violent manner or in a way that could put an adult or a child at risk of violence;

9 For this purpose, an estimate of age may be used.

10 For example: a community leader, a religious leader, a doctor, or a lawyer.

- spending too much time alone with a child, away from others, behind closed doors, or in secluded areas (see the “two-adult rule” described above). This does not apply to children for whom you have legal guardianship or custody;
- developing relationships with project participants that could in any way be considered exploitation or abuse;
- marry a person under the age of 18, regardless of their consent or local customs;
- making sexually suggestive comments or gestures to beneficiary/participant to a project,, even as a joke;
- engaging in sexual intercourse or a sexual relationship with a child, regardless of the child’s consent or local customs. Ignoring the child’s age is not an excuse;
- engaging in sexual intercourse or a sexual relationship with an adult CBM beneficiary or CBM partner where there are unequal power dynamics;<sup>15</sup>
- hitting, assaulting, or committing physical violence of any kind against children or adults;
- acting in ways that embarrass, humiliate, upset, belittle, or demean children or adults (perpetrating any form of emotional abuse);
- discriminate against or favor specific children or adults at the expense of others with whom I am working;
- take a child participating in CBM projects alone in a car or any other means of transportation unless it is absolutely necessary and with the consent of the parent/guardian and/or my superiors;
- invite children with whom I have a professional relationship to my private residence, unless they are at immediate risk of physical harm, in which case I must immediately inform my supervisor; endorse or engage in behavior toward children or adults that is illegal, risky, or harmful, including participation in harmful traditional practices (such as female genital mutilation and early marriage);
- exploit child labor (including domestic work) or adults. Note that the prohibition on child domestic labor (domestic work) does not exclude *occasional* babysitting, helping in the garden, or assisting with household chores outside of school hours by children of an appropriate age;
- exploiting both children and adults for sexual purposes, for example through prostitution;
- providing children with, or allowing them to consume, illegal drugs, alcohol, or substances prohibited for minors, or otherwise facilitating their use;
- using computers, cell phones, or social media to access material depicting the exploitation of minors, such as child pornography;
- abusing or harassing anyone physically or through electronic means;
- sharing information about CBM or its partners—such as photographs—on social media without consent. On the contrary, I am encouraged to “like” and share content posted on CBM’s official social media channels.

Place and Date

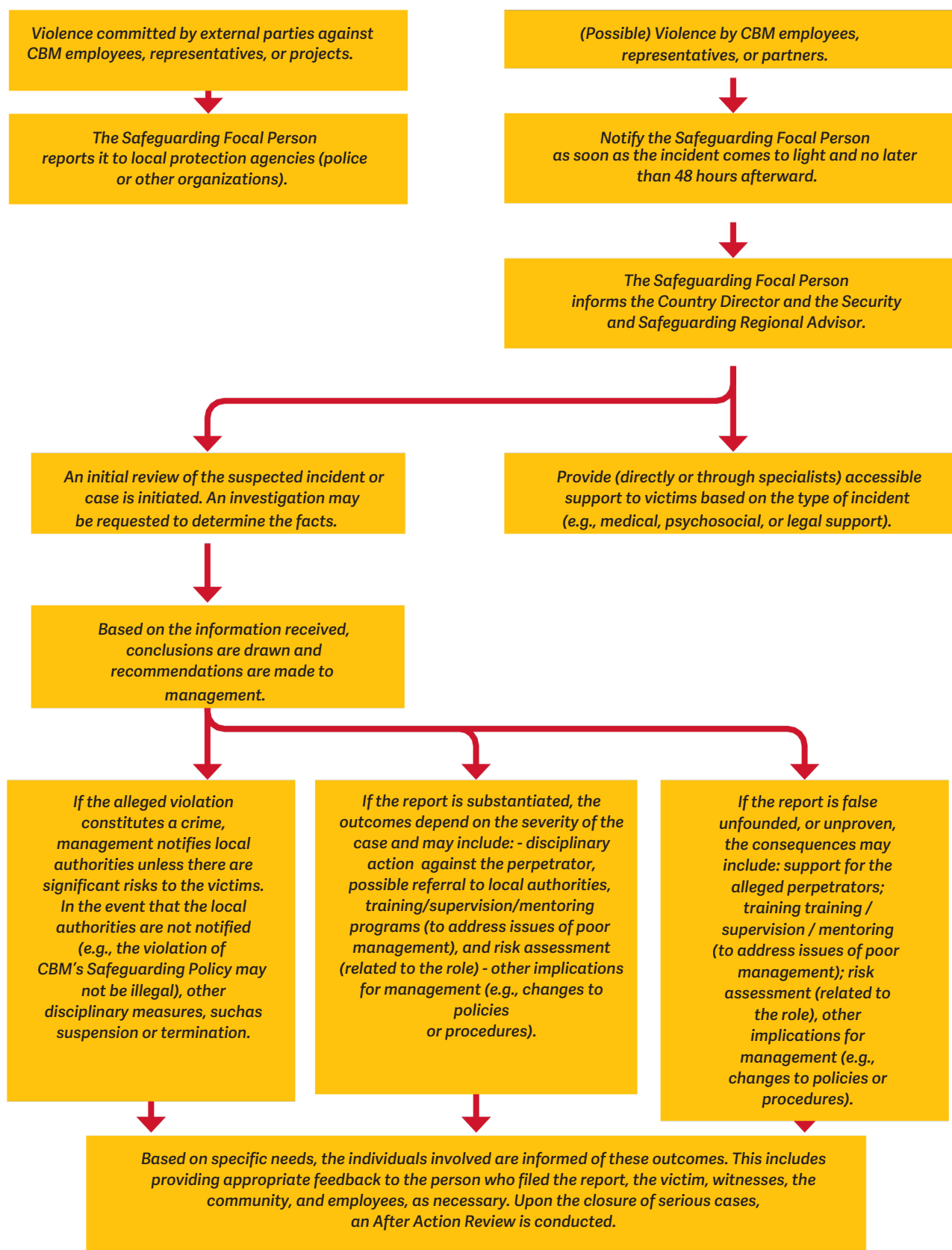
Signature

Note: If you are unsure whether an action, activity, or behavior may violate the Safeguarding Policy or the Code of Conduct, please the opinion of the relevant Safeguarding Focal Person or send an email to:

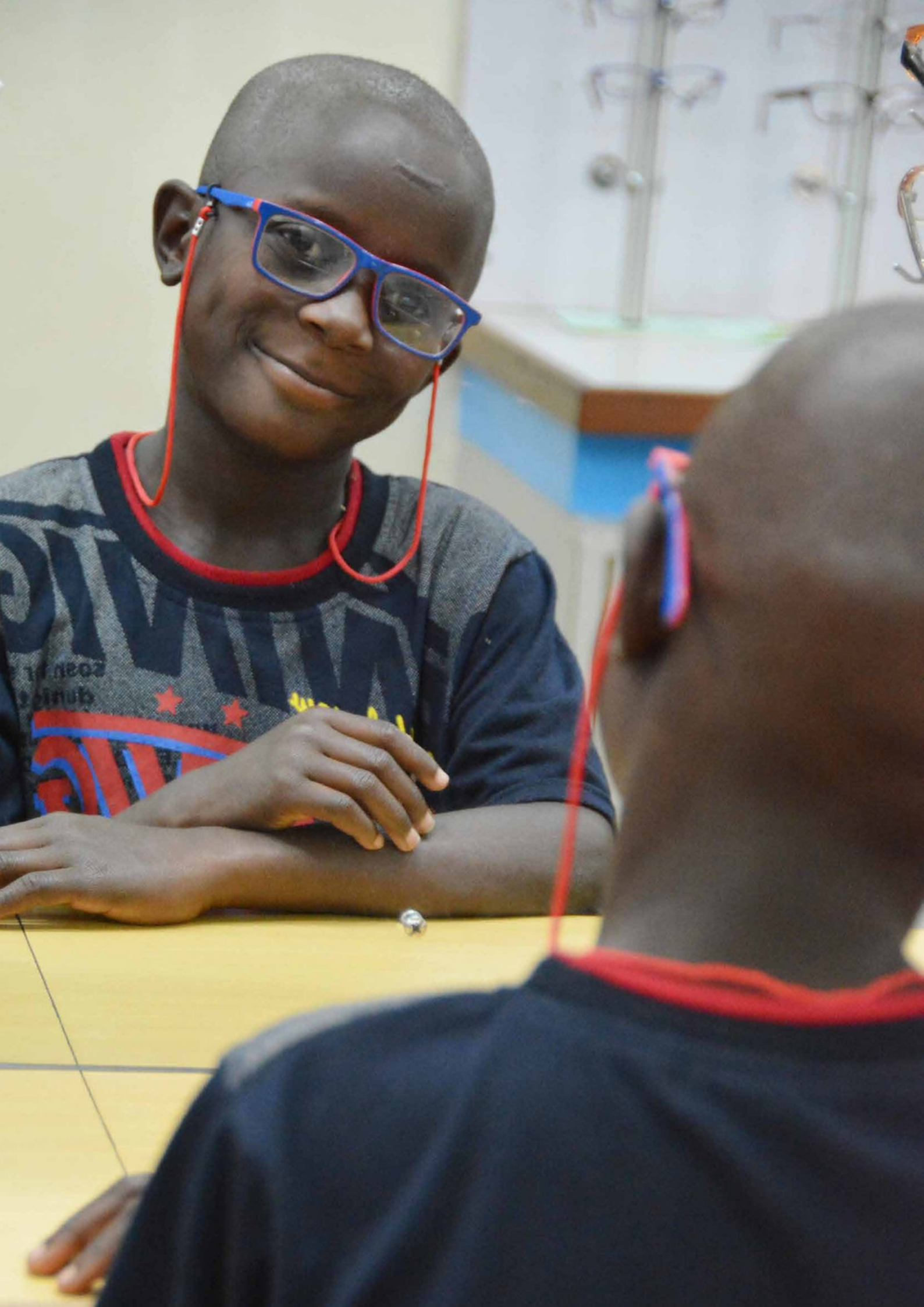
[safeguarding@cbmitalia.org](mailto:safeguarding@cbmitalia.org)

<sup>15</sup> If such a relationship existed prior to participation in the project, then it is acceptable. For example, if a spouse receives medical services provided by CBM partners at general hospitals.

## APPENDIX 2: CASE MANAGEMENT FLOWCHART<sup>16</sup>



<sup>16</sup> Based on Plan International's "Case Management Model Critical Steps" and lessons learned within CBM.



## APPENDIX 3. SAFEGUARDING CASE REPORTING FORM

*Please note: The information contained in this form is confidential.*

This form is used to report suspicions regarding potential violations of CBM's Safeguarding Policy or Code of Conduct.

**Send the email to:**

- SafeguardingFocalPerson
- or to the CountryDirector
- or to the Regional Security and Safeguarding Advisor
- or to the email address [safeguarding@cbmitalia.org](mailto:safeguarding@cbmitalia.org)

**Email subject line:** "ATTENTION: Confidential!".

Please provide as many details as possible in this form. Fields with nothing to report may be left blank.

*Details of the person reporting the case (do not fill out if you wish to remain anonymous)*

Name:

Location:

Phone:

Relationship to the project participant who may have suffered harm:

**Administrative information regarding the case**

Relevant CBM office:

Partner's name, if applicable:

Project number:

**Type of violation (check the appropriate boxes)**

☐ Physical

☐ Sexual

☐ Emotional

☐ Abandonment / Neglect

☐ Economic or other exploitation

☐ Violation of CBM's Code of Conduct

☐ Other (please provide additional details)

**Details of the person(s) who may have suffered harm (survivor/victim)<sup>17</sup>**

Name (not required if the case involves a CBM partner):

Age group (if known):

Gender:

Health condition or disability, if known and applicable:

Location of the incident:

**If urgent medical care is needed <sup>18</sup>, has it been provided?**☐ Yes☐ No**Have other internal contacts or external parties involved been informed of this incident?  
If so, which ones?****Other details about the case**

Who, what, where, when?

**Report completed by:**

Name:

Role and location:

Signature (electronic or on paper):

Date:

**What actions (if any) have already been taken, and by whom?****Submitted to:****Date:**<sup>17</sup> If there are multiple victims of the same or similar cases, a single form may be used, indicating that there are multiple victims. However, use a separate form if the case or suspicion differs.<sup>18</sup> Sexual abuse, such as rape, requires urgent medical attention.

## **APPENDIX 4: CLASSIFICATION OF SAFEGUARDING CASES AT CBM**

### *Minor Cases*

Minor cases are those cases or complaints that are not of a criminal nature but that violate CBM's Safeguarding Policy, e.g., violation of the "two-adult rule," or willful absence from safeguarding training.

All such cases are handled at the local level.

### *Serious Cases*

Serious cases are those that cause significant harm to individuals and organizations and are typically accompanied by high reputational risks, national and international media attention, donor concerns, and security risks.

Any safeguarding violation that also constitutes a criminal offense is automatically classified as serious. CBM also classifies any form of sexual violence as a serious case. Professional misconduct and negligence in the delivery of CBM project services also fall under the category of serious cases.

Assaults, serious bodily injury, harmful traditional practices, human trafficking, labor exploitation, sexual exploitation, abuse, and harassment (SEAH — Sexual Exploitation, Abuse, and Harassment), economic exploitation such as extortion, and exposing children to illegal substances are examples of serious cases.

It should be noted that minor cases may be classified as serious if committed in a systematic or recurring manner.



## APPENDIX 5: CBM RISK ASSESSMENT TABLE

|                                                                                                                                                                                  | <i>Example of a response</i>                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Activity (risk event)</i>                                                                                                                                                     | Physical therapy for children provided by staff with limited training.                                                                                                                          |
| <i>Effect</i><br>What impact would this have on the project, the people involved, and the objectives?                                                                            | Children could be injured (for example, limb fractures) if the therapy techniques were not understood or performed correctly.                                                                   |
| <i>Impact Probability</i>                                                                                                                                                        | High                                                                                                                                                                                            |
| <i>Possibility</i>                                                                                                                                                               | Low                                                                                                                                                                                             |
| <i>Risk Classification</i><br>Impact × Probability                                                                                                                               | Medium                                                                                                                                                                                          |
| <i>Risk Mitigation Strategies</i><br>List the measures already in place and those currently being developed that would eliminate or reduce the likelihood of the risk occurring. | Increase the frequency of staff training on the therapy.<br><br>Encourage staff to use only simple techniques and monitor their performance before introducing them to more complex techniques. |
| <i>Acceptable risk?</i><br>Yes/No                                                                                                                                                | Yes                                                                                                                                                                                             |
| <i>Risk owner</i><br>Individual responsible for the risky event                                                                                                                  | Project Manager at the partner responsible for implementation.                                                                                                                                  |
| <i>Time frame</i><br>Expected end date for the event                                                                                                                             | In progress                                                                                                                                                                                     |
| <i>Monitoring/Reporting</i><br>Frequency of the reports and methods                                                                                                              | Feedback meetings twice a year with staff and patients undergoing physical therapy.<br>Inclusion in reports to CBM and other donors.                                                            |

|                    |        | <i>Impact</i> |        |        |
|--------------------|--------|---------------|--------|--------|
| <i>Possibility</i> |        | Low           | Medium | High   |
|                    | High   | Medium        | High   | High   |
|                    | Medium | Low           | Medium | High   |
|                    | Low    | Low           | Low    | Medium |

## APPENDIX 6: CONSENT FORM FOR THE USE OF PHOTOS, IMAGES, OR STORIES OF CHILDREN AND ADULTS

### Declaration of Consent for the Use of Photos, Images, and Stories Guidelines for Obtaining Consent

| Age of the person          | Consent of parents/guardians                                                                             | Some details about the person                                                                                      |
|----------------------------|----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| Child (0– 16)              | Parental/guardian consent is required. Be mindful of the child's desire to participate.                  | <div>Person's Name</div> <div>Age</div> <div>Country/Location</div> <div>CBM Project/Partner</div> <div>Date</div> |
| Child (16 – 18 years old)  | Either the child or the parents/guardians may provide consent.                                           |                                                                                                                    |
| Adult (18 years and older) | Adults can give consent on their own. However, in some cases, assisted decision-making may be necessary. |                                                                                                                    |

#### 1. I authorize a CBM representative to (delete as appropriate)

|                                                                                     |                                                                                     |                                                                                       |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| <input type="radio"/><br>Talk to me and record what I say                           | <input type="radio"/><br>Film me                                                    | <input type="radio"/><br>Take my picture                                              |
|  |  |  |

#### 2. I authorize CBM to (delete as applicable):

|                                                                                     |                                                                                     |                                                                                     |                                                                                                      |                                                                                                                           |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <input type="radio"/><br>Use my name                                                | <input type="radio"/><br>Say which country I'm from                                 | <input type="radio"/><br>Use photos and/or videos of me                             | <input type="radio"/><br>Use information about myself, my family, and my community to create stories | <input type="radio"/><br>Use information regarding any medical condition, treatment, impairment, or disability I may have |
|  |  |  |                  |                                      |

### 3. Understanding and Consent

**I understand and agree that the information, photos, and/or videos mentioned above will be used by CBM and its partners and supporters for the purposes of fundraising, raising awareness, advocating for specific causes, and for other communications with CBM's sponsors, the media, or the public. My consent is provided on a voluntary basis (no payment will be made).**

The information, photos, and/or videos will be used by CBM in print materials (such as brochures), electronically and online (CBM's websites and social media accounts, emails sent by CBM), or in broadcasts. The information, photos, and/or videos will be stored in CBM's database, which is accessible to authorized personnel.

The list of organizations, associations, authorities, and other individuals (CBM's partners and sponsors) authorized to use my information, photos, and/or videos is attached to this form and has been accepted and signed by me. The partners and sponsors on the list will also use the information exclusively for the purposes mentioned above on their websites, social media accounts, and printed materials.



I am aware that I may revoke my consent at any time without retroactive effect by contacting CBM. After withdrawing my consent from CBM, the information will be deleted from the database and handled in accordance with the law. CBM will notify the partners and sponsors listed in the list of the withdrawal of consent.

Name of the person giving consent:

Relationship to the child  
(if consent is provided on behalf of a child):

Location:

Date:

Signature/Thumbprint:

#### Statement by the translator or person assisting with the assisted decision

- ☐ I have translated and/or explained the contents of this form into a language understood by the individuals concerned.
- ☐ I have not noticed any indication that the contents of the forms may not have been fully understood by the person I am assisting.
- ☐ I have obtained consent in accordance with the CBM Code of Conduct.

Name:

Organization (if applicable):

Date:

Signature/Thumbprint:

#### Statement by the person obtaining consent

I have obtained consent in accordance with the requirements of CBM's Safeguarding Policy.

Name:

Organization:

Date:

Signature/Thumbprint:

## **APPENDIX 7: MANDATORY GUIDELINES FOR CBM PARTNERS IN THE FIELDS OF OPHTHALMOLOGY AND HEALTH CARE WHO PERFORM SURGICAL PROCEDURES ON CHILDREN UNDER GENERAL ANESTHESIA**

General anesthesia in children is a very delicate procedure, even when performed by experts.

To ensure the highest quality of care and the greatest safety for the children we serve, all CBM partners in the fields of ophthalmology and healthcare who perform surgical procedures on children under general anesthesia **MUST** implement the following four guidelines:

1. All anesthesiologists and anesthesiology technicians who provide anesthesia services to children must be certified as anesthesiologists or anesthesiology technicians and must also have specialized training in the administration of anesthesia to children.
2. All operating rooms and intensive care units where children are admitted following surgery must always have all life-saving medications and functioning equipment available, including defibrillators.
3. All children scheduled for surgery must have been examined and undergone pre-surgery screening

by a pediatrician to rule out any underlying medical conditions prior to any surgical procedure under general anesthesia.

4. As a standard protocol, if children are fasting in preparation for general anesthesia, they must be scheduled for the morning surgery block, and the last surgery of the day on a child should not begin after 11:00 a.m.

For all CBM-supported health projects involving surgery on children under general anesthesia, implementation of the above guidelines is MANDATORY. Should partners require assistance in implementing these guidelines, they may contact their CBM national representative (CBM Country Office/Desk), through whom they can also access CBM's regional technical advisors.

Note: These guidelines are monitored by CBM's Program and Technical Advisory teams.

## APPENDIX 8: OTHER DEFINITIONS

|                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Types of Violence</b>                            | <p><b>Physical violence:</b> includes the use of violent physical force to cause actual or likely physical harm or suffering (e.g., beating, shaking, burning, female genital mutilation, torture).</p> <p><b>Emotional or psychological abuse:</b> includes humiliating and degrading treatment such as teasing with nicknames, constant criticism, belittling a person, continually embarrassing a person, segregation, or isolation.</p> <p><b>Sexual violence:</b> includes all forms of sexual violence, including incest, early and forced marriage, rape, involvement in pornography, and sexual slavery. Sexual violence against children may also include indecent touching or obscene exposure of the body, the use of sexually explicit language toward children, and showing children pornographic material.</p> <p><b>Abuse and neglect:</b> A child or adult may be abused when someone is in a position to do so fails to protect them from harm.</p> <p><b>Child abuse and neglect</b> means deliberately failing to meet a child's basic needs.</p> |
| <b>Child Pornography / Online Child Pornography</b> | When someone forms an emotional bond with a child in order to gain their trust for the purpose of committing sexual violence or abuse or for illicit trafficking. Child pornography can be perpetrated online or in person, by a stranger or by someone known to the child — for example, a relative, a friend, or a professional figure. <sup>19</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Sexual exploitation</b>                          | Any actual or attempted abuse of a position of vulnerability, a power imbalance, or trust for sexual purposes, including, but not limited to, economic, social, or political gains derived from the sexual exploitation of another person.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Sexual exploitation of a child</b>               | <p>CBM believes that:</p> <ol style="list-style-type: none"> <li>1. sexual activity with a child, with or without the child's consent, constitutes child abuse, such as rape or indecent acts;</li> <li>2. consensual sexual activity with a child who has reached the legal age of consent in the country where the child resides or where the act takes place, but who is under 18 years of age (even if it does not constitute a crime) will be treated as a violation of CBM's Safeguarding Policy and CBM's Code of Conduct.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Child Labor</b>                                  | <p>Child labor is work that is highly likely to be hazardous; to interfere with the child's education; to be harmful to the child's health or physical, mental, spiritual, moral, or social development; to be dangerous and harmful to children from a mental, physical, social, or moral standpoint; and to interfere with schooling because:</p> <ul style="list-style-type: none"> <li>• it deprives children of the opportunity to attend school;</li> <li>• it forces children to leave school prematurely; it requires children to try to combine school attendance with excessively long and strenuous work.<sup>20</sup></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Female Genital Mutilation /Cutting</b>           | <p>Female Genital Mutilation (FGM) is internationally recognized as a form of gender-based violence. It may involve:</p> <ul style="list-style-type: none"> <li>• the partial or total removal of the external female genitalia;</li> <li>• the suturing of the vaginal opening;</li> <li>• non-incision procedures such as pricking, piercing, and burning.</li> </ul> <p>This procedure poses extremely serious risks to the physical and mental health of girls and women and can cause complications during pregnancy and childbirth.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Early and Child Marriage</b>                     | Early and child marriage generally refers to marriage before the age of 18. Early and child marriage typically deprives girls, in particular, of education and life opportunities, leaving them vulnerable to violence, sexually transmitted infections, and problems associated with early pregnancy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Harassment</b>                                   | Unwanted sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that tends to be offensive and unwelcome.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

<sup>19</sup> Definition taken from the NSPCC.

<sup>20</sup> Definition of child labor taken from the International Labor Organization (ILO).

