



# RESPONSIBLE BEHAVIOUR POLICY & REPORTING PROCEDURE GUIDELINE

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# A. RESPONSIBLE BEHAVIOUR POLICY

## 1. RATIONALE

This is a three-part document: a policy, a guideline and n. 3 annexes.

The first part, the policy, is about what MSF Italy as an association and employer stands for, its responsibilities and what it expects from its employees, volunteers, collaborators, associates .

The second part is about the measures MSF (hereafter also MSF IT when indicating the Italian section and MSF when indicating the organization in general) has put in place to prevent and manage any violations of the Behavioural Commitments and breach of laws and regulations in regard to degrading treatment, and how anyone who has been exposed to any violations should report. The guideline is a short version of 6 pages, all parts are then more extensively explained in appendices that can be found through links in each section.

The third part is composed of n. 3 annexes that form an integral and substantial part of the policy and must be understood as referred to with reference to each point of the document.

This document (to follow “the Document”) sets out MSF Italy policy for the prevention and management of abuse and inappropriate behaviours and the reporting mechanisms that are available both within MSF Italy and as part of the wider MSF movement.

It stresses the importance of reporting acts of abuse and inappropriate behaviour as a way to decisively act against misconduct, thereby encouraging all our staff members (independently of their employee status), collaborators and volunteers to help ensure a caring, safe and inclusive environment for all.

Finally, it states unequivocally and applies the principle of **zero tolerance** towards any exploitation of the vulnerabilities of others.

Whenever any staff member, volunteer, associates and collaborator are unsure about the application of the Document or require further information, they should contact the direct line manager or referent or the Head of HR HQ ([silvia.fontana@rome.msf.org](mailto:silvia.fontana@rome.msf.org)) or the CEC (Comitato Etico e di Comportamento, [cec@rome.msf.org](mailto:cec@rome.msf.org) ).

Non-compliance with the Document may result in disciplinary actions and in serious cases lead to a termination of employment, collaboration or volunteering for MSF Italy.

The document will be revised every second year by the CEC in collaboration with HR department.

## 2. GUIDING PRINCIPLES AND CONCEPTS

### 2.1. Taking action

MSF Italy commits to take appropriate measures against all members of staff or partners who abuse their position within MSF for personal gain or exploit the vulnerability of others inside or outside MSF premises, or who otherwise behave inappropriately, in violation of our operational values and social mission.

The Document is based on the Italian laws and provisions and on MSF’s internal steering documents. The phrases unacceptable behaviour, degrading treatment and violation are in this document covering all kinds of behaviour regulated in:

- The MSF Behavioural Commitment (Annex 1)
- The Typology of abuses (Annex 2)
- Ethical code of MSF Italy (Annex 3)

- National labour laws, CCNL Terziario (art 220) and other legal provisions.
- Legislative decree 198/2006.

Please note that any person who has suffered from a behaviours that may constitute a crime according to the Italian Penal Code is entitled to report to the police.

## 2.2. Applicability: people concerned

The Document is applicable to:

- Staff, F2F, volunteers, interns, consultants and associative members within MSF IT premises or when on MSF IT events, associative or executive and when representing MSF externally or in other MSF offices
- Fieldworkers, also when on field contract, within MSF IT office premises in their relationships with MSF-IT HQ employees or collaborators and volunteers (for example, during briefing/debriefing and events organized by MSF Italy).
- Fieldworkers having reported a violation of the Behavioral Commitments in the field where the case was either not managed, unsatisfactory managed or when issues remain unsolved. In this case MSF IT will follow up by liaising with the behavioral committee concerned in the OC of reference of the mission to make sure the complaint is treated in due process.

## 2.3. MSF Behavioural Commitments

The MSF International Behavioural Commitments were approved in 2018 by the Full EXCOM, MSF's highest executive decision-making body. Within MSF, all members of staff and operational are expected to abide by these MSF Behavioural Commitments. Should this not be the case, MSF offers channels for reporting at every level of the organization and any noncompliance will entail due consequences. MSF Italy expects all members of staff, volunteers, associates and other people concerned as above specified to conduct themselves in accordance with the *MSF Behavioural Commitments as referred in Annex 1*: and in particular:

- *“Behave respectfully and not discriminate against patients, colleagues or members of the local population on the basis of their race, opinions, lifestyle, gender, sexual orientation, socio-economic background, origin, religion or beliefs and other markers of identity;*
- *not abuse anyone physically (e.g. physical violence, sexual aggression or other forms of physical abuse) or psychologically (e.g. bullying, abuse of power, harassment, discrimination or favouritism);*
- *non to accept, under any circumstances, behaviour that exploits the vulnerability of others, in the broadest possible sense (sexual, economic, social, etc.). This includes exchange of goods, benefits or services for acts of a sexual nature, including the use of sex workers' services while on assignment;*
- *not accept child abuse, exploitation and violence and not engage in sexual relations with children;*
- *not take advantage of their position for personal gain. Each member shall use MSF resources (including premises, goods, money, reputation, image, etc.) with respect and care and in the sole interests of the organization and the populations it seeks to assist”.*

The IPOB Abuse and Inappropriate Behaviour Typologies (referred in Annex 2) offers further guidance for those behaviours that are considered abusive and those that are considered inappropriate

Abusive behaviours include:

- **Harassment or bullying** is described as unwelcome and usually repeated behaviour that might reasonably be expected to cause offence to the affected person.

- **Discrimination** is described as any unfavorable treatment or arbitrary distinction based, in whole or in part, on a person or group's actual or perceived race, sex, gender, gender identity, gender expression, sexual orientation, religion, nationality, ethnic origin, disability, age, language, social origin or other similar characteristics that contribute to a person or group's identity.
- **Sexual Exploitation** is described as using authority, influence or control over resources to pressure, coerce or manipulate a person to provide sexual favors in exchange for resources or the offer of resources.
- **Sexual Abuse** is described as touching a person's private body parts or having other sexual contact with a person, without consent or by force, threat, surprise, manipulation or under coercive conditions.
- **Sexual Harassment** is described as unwelcome and usually repeated behaviour of a sexually explicit or suggestive nature that might reasonably be expected to cause offence to the affected person.
- **Exploitation** is described as using authority, influence or control over resources to pressure, coerce or manipulate a person to do something in exchange for resources or offer of resources.
- **Abuse of Power** is described as improper use of a person's power to the disadvantage of another person usually in a dependent or vulnerable role.
- **Aggression** is described as any act or threat of physical harm.
- **Abuses related to the case management process**, such as retaliation, interference in a case, false reporting (malicious) and breach of confidentiality.

Inappropriate behaviours include:

- **Inappropriate relationship**: An intimate or romantic relationship between MSF employees or between an MSF employee and a person from the local community, which can negatively impact MSF's stakeholders, working environment, reputation, or the continuity and security of operations.
- **Inappropriate communication**: Any spoken, written, or non-verbal language that is not respectful of others or their environment, even if it does not constitute abuse. This includes using an aggressive, annoying or insulting tone.
- **Inappropriate management**: Behaviour of a person placed in a supervisory position, which negatively impacts the working environment such as employee wellbeing or team cohesion.
- **Substance abuse**: The use of alcohol or drugs by an MSF employee or representative in such a manner that it influences their behaviour or work and may affect the wellbeing or safety of MSF's stakeholders and/or the interests and reputation of MSF.

Other ethical benchmarks include MSF statutory documents (MSF Charter, Chantilly Principles, La Mancha and other international resolutions).

#### **2.4. Ensuring an appropriate conduct is a collective responsibility**

MSF IT does not tolerate any behaviour that is degrading to individuals or groups, be it patients, other beneficiaries, staff, volunteers, students, candidates, donors or partners in collaboration. All cases of unacceptable behaviour should be reported in accordance with the reporting procedure outlined further below.

Filing a report of an incident or violation shall in no case lead to retaliations from the employer, or anyone representing the employer, such as e.g., reprimands, exclusion work wise or socially.

- Each MSF member of staff and people concerned is responsible for their own behaviour and for abiding by the rules set out by the organization;
- Every MSF member of staff and people concerned has the responsibility to be attentive to the well-being of colleagues and beneficiaries, and to report any inappropriate behaviour.

MSF IT Responsibility as an employer

- As an employer, MSF IT has the responsibility to protect the physical and psychological well-being and ensure the respect of the personality and integrity of its staff and protect them against any form of harassment, abuse or discrimination they may face at work. MSF Italy has zero tolerance for any form of violation of individual safety;
- As a humanitarian organization, MSF IT has a responsibility to ensure its human, financial and material resources, including the MSF logo/image, are used for no purpose other than those intended by the organization;
- Implementing and sustaining efficient and long-term preventative measures to increase knowledge and awareness amongst all MSF IT staff members, volunteers and people concerned
- Effectively and fairly manage internally, or with external assistance, any case of unacceptable behaviour according to transparent guidelines.
- Effectively and fairly manage and work preventatively against any norms/organizational culture promoting or resulting in unacceptable behaviour.
- Oppose to and work actively against any organizational culture of impunity and disparaging attitude.
- Ensure our workforce is enabled to work efficiently, reaching our qualitative and quantitative objectives without time, energy and resources being wasted on the damage that unacceptable behaviour will entail.
- Oversee and ensure that violations of the Document are investigated correctly and timely and not left without consequences.

To fulfil the above accountability, MSF IT has implemented several mechanisms to prevent and to manage incidents implying misconduct, see Reporting Procedure Guideline for reference.

#### ❖ **Management responsibility**

Management in MSF IT is responsible to uphold, maintain, and act in accordance with the Document and is, on top of above-mentioned employee responsibility, also expected to lead by example. All managers, middle managers and MT members, will be trained in preventative measures, support and resolution activities. The responsibility to investigate signs or irregularities and prevent/stop harassment should they be knowledgeable of its existence also lies with managers. Failure to fulfill this responsibility will be considered as unsatisfactory performance and will be followed up as per standard procedure.

#### ❖ **Individual responsibility**

All staff, F2F, volunteers, associates active in MSF IT have a responsibility to create and maintain an open, safe and sound working/collaborative environment and to be responsible for their own attitudes and actions. MSF IT encourages all people concerned by the Document to come forward should they be exposed to unacceptable behaviour and/or witnessing others being targeted to use existing channels of reporting presented further below. As it might be difficult to come forward in person, an email ([cec@rome.msf.org](mailto:cec@rome.msf.org)) has been created for a possibility to report as additional to the regular lines of reporting (HR or line manager).

### **3. PREVENTION**

#### **3.1. Institutional and individual responsibility**

The aim of our prevention activities is to promote an organizational culture that is based on collective and individual responsibility, respect and understanding, empathy and discernment.

As such, MSF Italy – represented by the management team – commits to protect the physical and psychological health of all the employees, volunteers, associates; to create a safe working environment, where the people feel empowered to report inappropriate behaviors of any kind; to promote regular discussion forums<sup>1</sup> about respect, inclusion and behaviour.

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<sup>1</sup> For example, these could take the form of monthly collegial discussions organised by staff or management.

### 3.2. Information

Prevention of abuse starts with information: everyone is responsible for knowing – and respecting – the rules of their workplace or of any place they may find themselves temporarily for activities linked to MSF (for instance during field or other HQ visits, during events).

In turn, the human resources team has a duty to brief each staff member and all other people concerned on the rules of conduct in force in that place and to systematically provide the corresponding documents to the individuals concerned.

For its part, the management team and the board commit to creating and facilitating training opportunities on ethical behaviour and related topics for all staff members. They strongly encourage all staff members and people concerned to actively participate in workshops, debates and any other events on such topics organised within the MSF movement, as transparency on behavioural issues is crucial.

### 3.3. Diversity, equity and inclusion

Committing to diversity, equity and inclusion (DEI) is critical to fostering a workplace environment of creativity, support, and mutual respect. A healthy, diverse and inclusive work environment that promotes good behavioral practices and rich, multicultural interpersonal exchanges is crucial. All individuals from different backgrounds should feel safe and empowered to use their voice to fully participate in MSF social mission.

### 3.4. Abuse of power

Inappropriate behaviour is often a manifestation of abuse of power. In this sense, one of the core responsibilities of all, and of managers and coordinators in particular, is to ensure good working practices (respectful interactions, sharing of information, healthy management relationships, interpersonal communication, etc.) are the norm, and to foster a culture of empowerment where expressing our differences and questioning individual or collective assumptions is both natural and welcome.

It is also the managers' responsibility to demonstrate and demand exemplary conduct from all those in permanent or temporary positions of power, and to offer the necessary support to achieve this. Positions of power are linked to the organization's hierarchical structure but also include opinion leaders, individuals who have, or have been delegated, decision-making powers, and anyone else who has an influential voice within the organization.

At individual level, all members of the MSF Italy community need to be vigilant and address situations and behaviours that could be considered questionable or in any way inappropriate. MSF's reason for being is to alleviate human suffering; people working for or in any other way engaged with MSF cannot and must not turn a blind eye to distress or suffering. That includes abuse of colleagues, volunteers or partners. Everyone has a duty to seek ways to help promote reporting and accountability.

## 4. GRIEVANCE MECHANISMS AVAILABLE

In addition to preventive measures, MSF Italy acknowledges its responsibility to provide a **formal framework** for addressing any issues of inappropriate behaviour that may arise. To this end, MSF Italy envisages a grievance mechanism providing recourse through specific MSF Italy channels, namely



through the HR Line, the managerial line and the behavioral committee (CEC: Comitato Etico e di Comportamento). Fieldworkers may refer primary to the MSF mechanisms in place in the field to advance compliances (e.g., Garec for OCB) when operative in a field mission and refer to the CEC for all concerns relative to their relationships with MSF-IT HQ employees or collaborators and in the case of relevant facts occurred in MSF-IT premises or events.

#### 4.1. MSF Italy channels

MSF Italy offers to the staff, three channels for reporting misconducts; the staff will decide which one to address to:

##### → HR line

The staff can raise concerns directly to the HR Department which may consider it necessary to transfer the management of the complaint to the CEC prior to the complainant's expressed consent. In case of allegations of sexual misconduct, the CEC must be informed immediately and a decision on the best case management strategy is decided between the HR Director and the CEC.

##### → Managerial line

Supervisors have a responsibility to oversee and manage their teams and are the first port of call for information and complaints if the staff feels they are a safe space. The managerial line of each MSF Italy employee includes the management team: all employees can raise concerns directly with any member of the management team (<https://www.medicisenzafrontiere.it/chi-siamo/lo-staff-di-msf-italia/>). The Managerial line may consider it necessary to transfer the management of the complaint to the CEC prior to the complainant's expressed consent.

##### → MSF Italy Behaviour Committee (CEC)

MSF Italy has set up its own behaviour committee, called CEC. It is a safe space where MSF IT staff can be heard and taken care of. The member of the CEC are external professionals with no direct managerial line to MSF-Italy executive thus it is an independent entity.

The CEC adheres to MSF standard principles and practices of case management among which the person-centered approach and the confidentiality.

#### 4.2. Other MSF Mechanisms

##### MSF Operational Centres

Each MSF Operational Centre has its own mechanism of reporting and case management. Field workers will have to address their complaints according to the specific mechanism of that OC. During the pre-deployment onboarding, Field Workers may ask for a specific briefing on that specific mechanism.

- OCB: [GAREC@brussels.msf.org](mailto:GAREC@brussels.msf.org)
- OCA: [responsiblebehaviour@amsterdam.msf.org](mailto:responsiblebehaviour@amsterdam.msf.org)
- OCG: [admin.abus@geneva.msf.org](mailto:admin.abus@geneva.msf.org)
- OCP: [abus@paris.msf.org](mailto:abus@paris.msf.org)
- OCBA: [behaviourcommittee.barcelona@barcelona.msf.org](mailto:behaviourcommittee.barcelona@barcelona.msf.org)
- WAKA: [dominique.niyonizigiye@waca.msf.org](mailto:dominique.niyonizigiye@waca.msf.org)

##### MSF hosting sections

Every hosting section should have a regulatory framework in place to prevent or manage abuse or inappropriate behaviour. The exact form of these frameworks varies, depending on national legal obligations and organizational sensitivities.

In line with MSF International's hosting principle and recognizing that (apart from Geneva) hosting sections are the legal employers of the staff they host; every employee is bound by the rules and procedures established by their hosting section. Therefore, MSF Italy encourages its staff to proactively seek information on the grievance mechanisms that are in force in their hosting section. The HR department of each section assists employees with information and documentation on behavioural matters and the complaint management procedure that can be used by any staff member who witnesses or is subject to harassment or abuse of any kind.

## 5. MSF ITALY BEHAVIOURAL COMMITTEE: CEC (Comitato Etico e di Comportamento)

The CEC is a collegial body composed of three members (the team's members could vary based on necessity, remaining always odd) working on a pro-bono/volunteer mode. Depending on the sensitivity or complexity of the case, an alert or complaint lodged with the CEC may be dealt with by CEC members themselves or through independent, external investigators. According to the needs, the number of members may increase.

Their function and responsibilities are:

- to listen to people,
- decide on the best strategy to follow for the management of the specific case,
- advise the management line,
- investigate and perform a fact-finding exercise
- conclude and recommend actions to the Decision-Making Authority

The CEC does not have decision-making or enforcement powers per se. It has access to all necessary information that may be related to the complaint and its role is to provide a clear and circumstantial recommendation to the MSF Italy Executive, in the persons of the Director General and the Director of Human Resources for final decision making.

The CEC members are selected by and accountable to the Board for a mandate of three years. Any concerns about the selection of CEC members should be addressed to the Board.

### Scope

- The Committee is responsible of handling each complaint received (either through the dedicated CEC mail or reported in person by the complainant or a whistleblower).
- The CEC will take care and manage complaints on allegations that, **if substantiated**, would represent a breach of the MSF Behavioural Commitments and of the Codice Etico.
- If the complaint received describes allegations that are not included in the MSF Behavioural Commitments and/or Codice Etico, the CEC will transfer the case to the HR Departments for resolution, prior consent of the complainant.

- Complaints or alerts related to abuse or misuse of MSF material resources will be referred to and managed by the Organismo di Vigilanza (OdV) (reference Annex 3).

### 5.1. Principles

The methodology followed in case management adheres to the **Standards Principles of Case Management** agreed by the MSF International Platform on Behaviour (IPOB).

The core principles of abuse complaint management and investigation are **confidentiality, independence and fairness**.

**Confidentiality** is guaranteed in all phases of the case management to protect the person who reported the facts, the victim and the subject of the complaint.

The identity of the person or people concerned by a complaint or alert will not be disclosed. In certain situations where the management of the case requires it, certain information may be disclosed, but only with the express consent of the person, the whistle-blower or the accused, as applicable.

**Independence**: CEC is free to decide on the best course of action to process a complaint, its members being independent of the hierarchical bonds during this process. They commit to treat complaints impartially, basing their decisions on objective criteria.

**Fairness**: The CEC approach is **people-centered** meaning that all individuals must be treated in a fair and professional way. Every part will be listened to and treated without any bias and judgment.

### 5.2. Contact

If any member of MSF Italy experiences or witnesses inappropriate behaviour, alerts or complaints can be addressed to the CEC through:

- the online platform at <https://segnalazioni.msf.it/>, which is suitable for guaranteeing the confidentiality of the reporter's identity.
- the dedicated email address: [cec@rome.msf.org](mailto:cec@rome.msf.org).

To preserve the CEC's neutrality and prevent conflicts of interest, both tools will be monitored by all members of the CEC according to an established procedure.

The CEC is subject to strict rules of confidentiality: it will examine alerts and complaints directly or with the help of existing MSF investigative mechanisms and refer its conclusions and recommendations for execution to the Decision-Making Authority (General Director and HR Director).

### 5.3. Sanctions

If the findings of the investigation validate the allegations, a recommendation with specific actions will be defined by the CEC according to the gravity of the facts. In reference to the recommendations and the specific situation, the CEC will recommend to the Decision-Making Authority that disciplinary measures should be taken. The CEC does not give recommendations on specific sanctions, as this responsibility will remain in the remit of the Decision-Making Authority. These measures can range from a written warning to dismissal.

#### 5.4. File management and reporting

Knowing that under-reporting of inappropriate behaviour and abuse is a real issue, it is important to acknowledge the existence of cases of inappropriate behaviour for other victims and whistle-blowers to feel safe to report incidents. By being transparent and acknowledging the problem, we also create an opportunity to engage in healthy dialogue that reinforces prevention and action.

The CEC will create and maintain a database that complies with GDPR provisions and follows the International Platform on Behaviours (“IPOB”) recommendations on data consolidation. Files will be kept in a restricted-access archive according to data protection provisions and managed by the CEC coordinator. Only the team dealing with the case and CEC have full access to all information.

The CEC will extract data on a regular basis and provide non-specific, anonymized information (i.e., statistics) and the CEC will perform yearly analyses with the following aims:

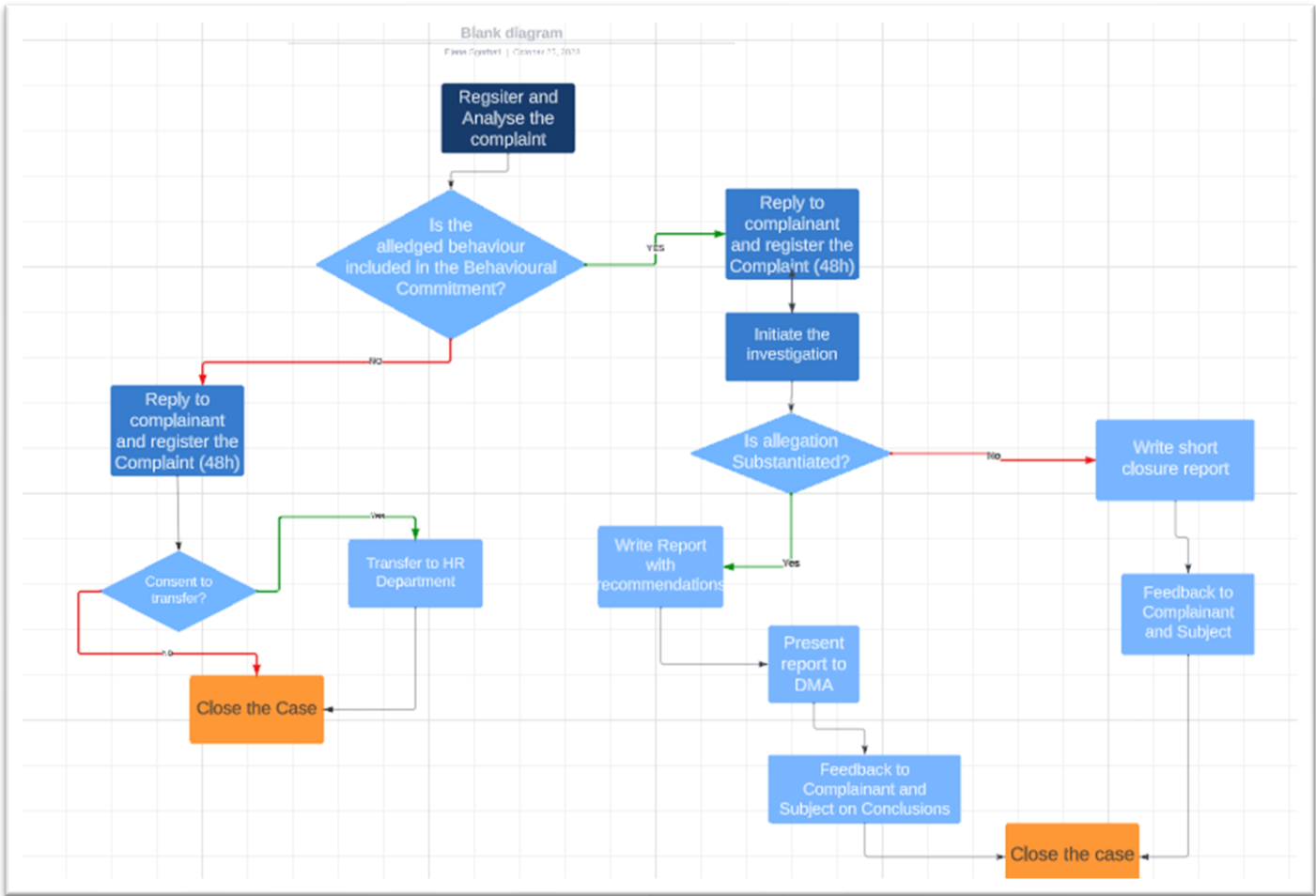
- To monitor the situation and identify appropriate organizational measures for enhanced prevention;
- To report on the numbers and types of cases for the MSF movement’s data consolidation on behaviour by the IPOB and to MSF Italy.

#### **IN BRIEF:**

**If you witness or experience behaviour that you consider inappropriate, you can choose any of the following courses of action:**

- ✓ Speak with your supervisor or a member the management team
- ✓ Speak with an HR representative
- ✓ Contact your hosting or managing section’s structure that deals with abuse and harassment
- ✓ Contact the MSF Italy Behaviour Commission [cec@rome.msf.org](mailto:cec@rome.msf.org)

# B. CASE MANAGEMENT PROCEDURE GUIDELINE



## 1. INTRODUCTION

The Case Management Procedure Guideline contains the measures that MSF IT has put in place to manage any violations of the Behavioural Commitments and labor laws. The guideline is based on the Standards for Case Management (IPOB, October 2021).

MSF-IT offers secure complaining channels to address complaints of misconduct with the firm intention of handling any report in a serious and fair manner and to take disciplinary actions whenever the allegation of misconduct is confirmed.

## 1.1 Who can report a complaint

Reporting a misconduct is a duty as defined in the Behavioural Commitments. Failure to report could result in adding harm to the person who suffers the abuse.

Incidents can be reported by a survivor or a third party, i.e., a colleague, a beneficiary, a community member. The existence of a written statement is not necessarily a pre-requisite to start an investigation into an allegation.

Anonymous complaints are not encouraged but they can be accepted exceptionally for very severe cases (Sexual Exploitation and Abuse). Whenever you receive an anonymous complaint encourage staff to speak up while giving reassurance on confidentiality.

All allegations and complaints will be heard and analyzed prior to the decision to launch an investigation.

### → *If you have been exposed to an abusive or inappropriate conduct*

If exposed to unacceptable behaviour, the optimal first response is to talk to the perpetrators and let them know how their behaviour is perceived. If this is not an option, due to discomfort or if such a response has not proven to be helpful, the incident should be reported through one of the channels implemented in MSF IT (see 2.2- Reporting channels).

### → *If you have been witnessing or have been confided an abusive or inappropriate conduct*

If witnessing unacceptable behaviour, it is not obvious that you should report it. Always talk to the person exposed, support them to either talk to the perpetrator or to report it, but if they are not willing to report, you will risk increasing the discomfort of the exposed by reporting it.

In case the facts reported are causing discomfort, you can report to CEC the facts you have come to know **without disclosing the identity of the person who has suffered the misconduct.**

Alternatively, you may want to talk to some person of trust, preferably your line manager or HR, to unload, ease your burden and get advice. When doing so **do not disclose** the identity of the person who has suffered and reported to you the misconduct.

## 2. CEC STEPS FOR MANAGING A COMPLAINT

### Step 1: Welcoming and registering a complaint

The initial complaint to the organization may be made in writing, by phone (including SMS), or in person. In either case, it should give basic information about who the complainant is and what they allege, i.e., what happened (roughly), who did it, when, where, who else was there and how the Complainant can be contacted again.

When reporting a misconduct, you can choose among different options.

#### → HR line

The staff can raise concerns directly to the HR Director or HR Manager. If the subject of the concerns is one of them, the concerns may be directed to their line manager. Fieldworker in Italy may refer primary to HR Coordinator of the operations (or their functional manager if s/he is subject of the concerns). The recipient of the complaint will may want to transfer the management of the complaint to the CEC prior to the complainant's expressed consent, or to ask for support in the management of the case to the CEC.

#### → Managerial line

Supervisors have a responsibility to oversee and manage their teams and are the first port of call for information and complaints. The managerial line of each MSF Italy employee includes the management team: all employees can raise concerns directly with any member of the management team (<https://www.medicisenzafrontiere.it/chi-siamo/lo-staff-di-msf-italia/>). The Managerial line could decide to transfer the complaint to the CEC prior to the complainant's expressed consent or to ask for support in the management of the case to the CEC.

#### → MSF Italy Behaviour Committee (CEC)

Report to the CEC through the following mail address: [CEC@rome.msf.org](mailto:CEC@rome.msf.org)

All reports will be handled with confidentiality and in accordance with GDPR. The privacy and the protection of the person filing the report will be respected at any moment, and information will be shared on a **need-to-know basis**.

The CEC mail inbox is managed by the CEC members only; emails should be replied to within 1 – 2 working days. The first reply to the complainant should be a note of good reception with an introductory document from the CEC.

Initial case discovery conversations, by email, phone, or other meanings, should attempt to get information to proceed to the first triage.

### Registering a Complaint

The register of the complaints is kept by the CEC, so it is important that CEC is informed (with no details if there is no consent) regularly by the other channel receiving and/or managing the complaint. The incident register includes information related to a case in a codified manner to be compliant with Data Privacy and to respect confidentiality. The register will contain all details that are necessary to report at international level in a standardized manner.

Breach of confidentiality is sanctioned through disciplinary measures.

### Step 2: Deciding whether to investigate - Assessment of a complaint

All complaints need to be reviewed and addressed but not all of them will require a formal investigation process. Once received the complaint, CEC members will first analyze whether there is significant reason to start an investigation.

Investigation will start when:

- CEC determines that, if substantiated, the allegations would constitute a breach of the Behavioural Commitments and of the Codice Etico, and
- There is an identified person affected by a misconduct
- There is an identified subject of complaint.

When the complaint received falls outside the CEC mandate (it does not fit within IPOB typology), the complainant will be referred to the HR department or to the line as appropriate, always keeping the door open to return to the CEC if they consider they did not obtain a proper answer.

Before transferring / refer the complainant to other management line, the CEC will listen to and obtain the informed complainant's consent.

If the allegations are about Fraud and Corruption, the CEC will liaise with OdV.

The initial assessment should be performed ideally within 48 hours after receiving the complaint. The outcomes of the initial assessment are not intended to verify or reject the complaint but serve as basis for planning next steps.

Note that at this stage, immediate health and protection concerns regarding those involved should be assessed and dealt with. In case of need the CEC should contact the Decision-Making Authority as soon as possible and before the investigation starts.

### **Determining case management strategy**

All reported allegations must be analyzed, but not all reported allegations will need investigation. There are several different options and strategies that may be followed with no need for an investigation.

- Manager has a conversation with the Subject to make them aware of how the behaviour makes the Complainant feel (if the Complainant agrees). This could be combined with making respectful communication/management as part of the goals and feeding back in the context of the performance discussions
- Mediation (only if Complainant and Subject agree). The goal is to reach an agreement on the way forward. This is done with the help of an impartial mediator. The parties, rather than the mediator, decide the terms of the settlement.

All SEAH (Sexual Exploitation Abuse and Harassment) allegations must be investigated, and mediation is not an option.

All SEAH allegations must be immediately communicated to the CEC.

### **Step 3: Appointing an Investigation Team**

When the investigation is decided, the CEC will assign two investigation members to investigate the case, balancing experience, gender, knowledge as pertaining to the specificities of the case, potential conflict of interest, availability, language required, diversity.

Any member of the CEC can decide to opt out in an investigation if a conflict of interest or possible bias is declared. The CEC coordinator may decide whether the appointment of an external investigator is needed or



of specific experts' support (i.e., psychologist, psychiatrist, expert in trauma informed investigations). Anyone being called to participate in an investigation will sign a **confidentiality agreement**.

#### **Step 4: Preparation of the investigation**

As soon as the kick-off of the investigation is decided, a folder in MSF Italy private intranet space will be opened by the CEC coordinator, assigning NUMBER\_YEAR\_NAMECASE. This folder will include different templates which will help the investigation team (logbook, investigation plan, minutes of interview, organigram, contact lists etc..).

An investigation plan will be discussed and agreed with the members of the CEC .

The CEC will inform the Decision-Making authority of the opening of a case on a need-to- know basis (temporary protection measures to be put in place) and respecting the confidentiality principle as soon as possible.

#### **Step 5: Gathering background Material and documentary evidence**

Throughout the investigation, the investigators will need to consult documents – in hard copy and electronic form- to identify evidence. Information relevant to the case may include records, rosters, photos, diagrams, handwritten notes and information stored electronically.

Evidence should be collected as soon as possible in the investigations. The investigation lead will file all hard documents in the specific case folder. Give evidence a number when registering them.

The investigation team assigned to each case is entitled the access to any kind of information which may be relevant for the correct development of the analysis and investigation. Failure to do so, may be reprimanded as stated in the MSF Typology for Abuses and Inappropriate Behaviours.

During the investigation, the investigation team is entitled to access information in the corporative mail accounts, computers, mobile devices, prior informed consent.

#### **Step 6: Updating the investigation plan and interviewing witnesses**

The information gained from gathering and analyzing documents will probably make necessary an update of the investigative plan: new questions or new witnesses may have been identified.

Witness testimony is particularly important in SEAH (Sexual Exploitation Abuse and Harassment) investigations, and in any other investigation to crosscheck and triangulate information.

The investigation team usually proceeds by interviewing the complainant, followed by person affected by the misconduct (if different from the complainant) , the witnesses if there are any, and in the last stage the Subject of Complaint (SOC). In any case, the recommendation is to inform the SOC about the opening of an investigation at the very beginning after having analyzed protection risks for the parties involved.

#### **Step 7 – Analysis of findings, conclusions and recommendations**

The investigation team will present the findings to the plenary session of CEC to gather diverse opinions and decide on conclusions and recommendations.

#### **Step 8 – Writing the report**

The report contains the investigators' conclusions on whether, based on the available evidence, there has been a breach of relevant standards of conduct. It sets out, in a narrative form, how the alleged misconduct

was discovered, to whom it was reported, the steps taken to gather evidence, the investigators' conclusion and the evidence supporting these conclusions.

The investigation report is submitted to the Decision-Making Authority, which is the General Director and the Head of Human Resources.

The results of the investigations will fall always in one of these three categories:

- The **Allegation is Substantiated** by reasonable interference based on the evidence.
- The **Allegation is Inconclusive** or not Substantiated based on insufficient or unclear evidence.
- The **Allegation is Unfounded**, or the complaint was malicious: based on evidence which clears the alleged subject of complaint or proves a malicious complaint.

The CEC provides recommendations only, do not issue sanctions, the final decision about the sanction is taken by the Decision-Making Authority.

The CEC, will follow on the implementation of the recommendations.

### **Step 9: Communication of Outcomes**

The communication of the outcomes will be done first to the complainant and then the subject of complaint. Witnesses never receive feedback on outcomes, and they must be informed about it before we proceed to the interview.

The communication of the outcomes will be done face to face, or via Teams, Skype or Phone and if possible, it will be recorded prior authorization received by the person involved.

In case that the complainant or the subject of complaint requests written feedback about the outcomes of the investigation, the CEC can provide a written summary of the conclusions and recommendations prior discussion with the Director of HR who will seek appropriate legal advice.

The disciplinary measures will be communicated to the SoC (Subject of Complaint) by the Director of HR Department.

## ANNEXES

### Annex 1 – MSF Behavioural Commitments

#### 1 Preamble

MSF considers itself a responsible employer and association, and this rests on the responsible behaviour of its members. There is a mutual and complementary role of the employee and the employer to prevent, detect and address unacceptable behaviour and MSF staff should deploy the means to inform its patients and direct beneficiaries on the behavioural commitments stated below.

Within MSF, all members of staff (employees, including staff on international assignment, volunteers, daily workers) and operational partners (including consultants and guests) understand and adhere to the commitments below, incorporate them into their professional and personal conduct, and abide by them. Should this not be the case, MSF offers channels for reporting at every level of the organization and any non-compliance will entail due consequences. These Behavioural Commitments are considered as a minimum behavioural standard, more specific rules may apply to MSF staff members depending on the context in which they work and their area of activity.

#### 2. Definitions

##### 2.1 Assignment

Is considered on assignment:

1. Any staff member, in the following circumstances: 1) when they are performing duties for MSF inside or outside of their usual place of work, and/or 2) they are present on MSF premises, and/or 3) during their working hours.
2. *At all times*, any staff member being perceived as a member of or representing MSF. This includes:
  - when using MSF cars or wearing MSF signs of identification
  - when being assigned in a location different from their place of recruitment (international staff and any other staff being temporarily or permanently relocated in order to perform duties for MSF)
  - all members of MSF leadership, all board members of MSF entities, all GDs, all Directors or Heads of departments in all entities, all advocacy and representation staff and all coordinators.

##### 2.2 Children

- Article 4 of the MSF Behavioural Commitments states: “MSF staff members and partners shall not accept child abuse, exploitation and violence and not engage in sexual relations with children;”
- The definition of children comes from the UN Convention on the Rights of the Child, which defines a child as “*every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier*”. This means that the age under which an individual is considered a child can vary from one country to another.
- In terms of implementation, this means that each MSF entity will apply the article of the Behavioural Commitments according to the local laws applicable to the child. For international staff, the law applicable in the country issuing the employment contract must also be respected.

##### 2.3 Staff members and operational partners – Scope

- Members of staff: all employees on assignment, volunteers, daily workers
- Operational partners: consultants, any staff receiving incentives (MoH, NGOs...) and guests (visitors on MSF projects and offices such as journalists, visiting scientists or major donors)
- The Behavioural Commitments also apply to all Associative members, volunteers and international staff located in Italy (cross admin).

## Behavioural Commitments

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- MSF staff members and operational partners shall behave respectfully and not discriminate against patients, colleagues or members of the local population on the basis of their race, opinions, lifestyle, gender, sexual orientation, socio-economic background, origin, religion or beliefs and other markers of identity;
- MSF staff members and operational partners shall not abuse anyone physically (e.g. physical violence, sexual aggression or other form of physical abuse) or psychologically (e.g. bullying, abuse of power, harassment, discrimination or favoritism);
- MSF staff members and operational partners shall not accept, under any circumstances, behaviour that exploits the vulnerability of others, in the broadest possible sense (sexual, economic, social, etc.). This includes exchange of goods, benefits or services for acts of a sexual nature, including the use of sex workers' services while on assignment;
- MSF staff members and operational partners shall not accept child abuse, exploitation and violence and not engage in sexual relations with children<sup>4</sup>;
- MSF staff members and operational partners shall not take advantage of their position for personal gain. Each member shall use MSF resources (including premises, goods, money, reputation, image etc.) with respect and care and in the interests of the organisation and the populations it seeks to assist.

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<sup>4</sup> Article 1 of the *United Nations Convention on the Rights of the Child*, adopted and opened for signature, ratification and accession by General Assembly resolution 44/25 of 20 November 1989, entry into force 2 September 1990, in accordance with article 1: "For the purposes of the present Convention, a child means every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier."

## **Forms of Abuses & Inappropriate Behaviours**

### **A. Introduction**

This document sets out the definitions of the forms of abuses and inappropriate behaviours, as agreed between the Behaviour Units of all operational centres at the Intersectional Platform on Behaviour (IPOB). It replaces the previous IPOB definitions dated November 2018.

The current document's purpose is to inform MSF employees and representatives <sup>[1]</sup> and the people MSF serves about the forms of behaviour that MSF considers unacceptable. It also provides guidance to case managers on how to interpret facts.

These abuse definitions might be different from legal definitions in the countries in which MSF operates. Also, the examples of abuse provided are not exhaustive. There are other situations that might qualify as abuse.

Disagreements between a manager and a supervisee about matters such as the supervisee's work performance or contractual issues do not constitute abuse on the part of the manager or supervisee, if they responsibly state their feedback or concerns and act in line with their roles and duties. Managers have a responsibility to give full, balanced, and constructive feedback and to take appropriate action as needed.

MSF has channels in the field and at HQ, tasked with managing behaviour-related matters.

Please check with your manager about available channels in the field. In addition to field channels, there is a Behaviour Unit (BU) or [Behaviour Committee] at HQ level, which you can contact at any time. You can use these channels to report abuses/inappropriate behaviours or seek advice. All employees and representatives have a responsibility to always report serious allegations or incidents, such as those related to sexual exploitation, abuse and harassment (SEAH).

When a report is received, the relevant BU or field channel will do an initial review to assess whether the reported behaviour, if proven, would constitute an abuse under one or more of the IPOB abuse definitions. If the reported behaviour does not fall within the scope of the IPOB abuse definitions, the BU of field channel will refer the report to the relevant department.

In addition, it is possible that after investigation, a reported behaviour is qualified differently than how it was reported (e.g. after investigation, a report of 'abuse of power' is determined to constitute 'harassment').

#### **Of Note:**

**Vulnerability:** A person or group may be vulnerable to abuse or inappropriate behaviour because of personal or situational factors, whether actual or perceived. Such factors include race, gender, age, religion, disability, ethnic background, hierarchical position, socio-economic background etc.

Also, vulnerability can be 'intersectional.' This means it can be based on more than one factor, which often causes a disadvantage to the affected person. For instance, a person may be discriminated against based on both their ethnicity and religion.

**Gender-based violence (GBV):** GBV is a life-threatening global health and human rights issue. It is a broad term that covers any form of abuse that is directed toward or disproportionately affects a person or group because of their gender, actual or perceived. Unequal gender norms and power relations are root causes of GBV. While women and girls, those of diverse gender identity, and persons identifying as Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersex,

or Asexual/Allies (LGBTQIA) suffer higher rates of GBV, men and boys can also be targeted. GBV is considered a cross-cutting behavioural concern as it can take many forms, including some of the abuses described in this document.

## B. Forms of Abuses

### B.1. Harassment or Bullying<sup>[2]</sup>

Harassment or bullying means unwelcome and usually repeated behaviour that might reasonably be expected to cause offence to the affected person.

#### Explanatory notes:

- Whether behaviour is considered unwelcome depends on the viewpoint of the affected person. Whether the behaviour could reasonably have been expected to cause offence is assessed based on MSF's values, principles and standards for a respectful working environment.
- Harassment or bullying usually implies a series of incidents or a pattern of behaviour.
- Harassment may take the form of words, gestures, visuals, actions or inactions.
- The term 'offence' has a broad meaning, which includes to annoy, alarm, intimidate, demean, belittle, or humiliate another.

#### Examples:

- Humiliating a person through shouting, insults, jokes, or criticism, often in front of others.
- Sending insulting messages (e.g. through notes, email, phone call or other means).
- Displaying pictures that are demeaning or threatening in nature including posters, website content, or social media images.
- Spreading malicious gossip.
- Not speaking to or refusing to directly communicate with a person.
- Constantly criticising a person's work without providing help or support.
- Assigning unreasonable tasks, workloads or deadlines.

### B.2. Discrimination

Discrimination means any unfavorable treatment or arbitrary distinction based, in whole or in part, on a person or group's actual or perceived race, sex, gender, gender identity, gender expression, sexual orientation, religion, nationality, ethnic origin, disability, age, language, social origin or other similar characteristics that contribute to a person or group's identity.

#### Explanatory note:

Exceptions may apply if there is a legitimate aim that can be objectively justified and the means of achieving that aim are appropriate and necessary.

#### Examples of discrimination:

- Not hiring, not offering equal career opportunities, or not renewing a person's contract because of (actual/perceived) personal characteristics.
- Offensive language or hostile behaviour based on an individual or group's (actual/perceived) personal characteristics such as:
  - o Ridiculing or belittling a person/group's abilities or skills.
  - o Undermining a person's work or deliberately preventing their access to the appropriate means to do it (information, documents, equipment, etc.).
- Subtle forms of discrimination or micro-aggressions based on (actual/perceived) race or other personal characteristics such as:
  - o Inappropriate comments, often based on stereotypes.
  - o Ignoring or excluding a person/group's contributions, actions, or comments.
  - o Excluding from activities available to others in a similar circumstance.
  - o Not providing the same level of support as given to others in a similar circumstance.

## Example of Exceptions:

- Offering certain country assignments to persons of a specific profile due to operational or security reasons.

## B.3. SEAH: Sexual exploitation, abuse, and harassment

### B.3. I. Sexual Exploitation

Sexual Exploitation means using authority, influence or control over resources to pressure, coerce or manipulate a person to provide sexual favours in exchange for resources or the offer of resources.

#### Explanatory note:

- It involves an abuse of vulnerability or power differential for sexual gain personally or for a third party. The authority, influence or control over resources can be actual or perceived.

#### Examples:

- The exchange of sex or sexual favours for money, employment, goods, or services. This includes (a) any exchange of sex for assistance given to patients or other stakeholders in the local communities in which MSF serves (b) any exchange of sexual favours for employment benefits or training opportunities.
- Use of the services of sex workers.
- Sexual relations with a child: this means sex with a person under the age of 18 years, regardless of age of majority or consent locally.
- Sexual relations between employees/representatives and patients or other persons directly receiving services in MSF projects regardless of consent.
- Engaging in or facilitating the sex trafficking of persons.

### B.3. ii. Sexual Abuse<sup>[3]</sup>

Sexual Abuse means touching a person's private body parts or having other sexual contact with a person, without that person's consent or by force, threat of force, surprise, manipulation or under coercive conditions.

#### Explanatory note:

- When this definition refers to a person's private body parts, it means the part of a person's body kept covered in public. This includes, but is not limited to, bodily parts involved in reproduction.
- Local customs and norms will be taken into account when considering what constitutes private body parts in a particular context.
- Sexual abuse covers a broad range of unwanted sexual behaviour involving contact with private body parts. It can range from touching to physical assaults of a sexual nature.

#### Examples:

- Unwanted kissing.
- Unwanted touching of private body parts.
- Non-consensual sexual intercourse.
- Forcing a person to perform a sexual act on another person.

### B.3.iii. Sexual Harassment

Sexual Harassment is unwelcomed and usually repeated behaviour of a sexually explicit or suggestive nature that might reasonably be expected to cause offence to the affected person.

#### Explanatory note:

- It covers verbal, non-verbal and written behaviour, as well as physical acts on non-private body parts.

- Whether behaviour is considered unwelcome depends on the viewpoint of the affected person. Whether the behaviour could reasonably have been expected to cause offence is assessed based on MSF's values, principles and standards for a respectful working environment.
- While sexual harassment usually involves a pattern of behaviour, it may also occur as a single incident.
- The term 'offence' has a broad meaning, which includes to annoy, alarm, intimidate, demean, belittle, or humiliate another.

**Examples:**

- Verbal forms of sexual harassment may include unwelcome sexually explicit or suggestive:
  - oral threats, jokes or insults;
  - comments about a person's body;
  - questions about a person's intimate life;
  - comments about one's own preferences or abilities.
- written messages in hard copy or in the form of emails, text messages, videos, or other electronic media.
- Non-verbal forms of sexual harassment may include unwelcome sexually explicit or suggestive: gestures, leering or whistling; indecent exposure; display of pictures, posters, or objects.
- Unwelcome physical acts on non-private body parts may include: forced hugs; standing too close to a person; cornering or trying to be alone with a person unnecessarily; performing unwanted massages.

### B.3.iv. Exploitation

Exploitation means using authority, influence or control over resources to pressure, coerce or manipulate a person to do something in exchange for resources or offer of resources.

**Explanatory note:**

- It involves an abuse of vulnerability or power differential for gain personally or for a third party. The authority, influence or control over resources can be actual or perceived.

**Examples:**

- An MSF employee offering services to patients or other stakeholders in exchange for (implied or expressed) payment to the employee or a third party.
- An MSF employee demanding certain goods from local community members before providing access to a project location.
- An MSF ambulance driver demanding payment from patients before transporting them to the healthcare centre.

### B.4. Abuse of Power

Abuse of Power means improper use of a person's power to the disadvantage of another person usually in a dependent or vulnerable role.

**Explanatory note:**

- Behaviour is considered to be improper if a person uses the power attributed to them, whether actual or perceived, for purposes other than to fulfil their duties and responsibilities.

**Examples:**

- A manager refusing to provide training or other career opportunities because of personal dislike for a team member.
- A manager asking team members to perform tasks outside of working hours that are not part of their work duties.
- A manager improperly influencing the career or employment conditions of another, including, but not limited to assignment, contract renewal, performance evaluation, or working conditions.
- A manager using intimidation, threats, or coercion against a subordinate such as threats of dismissal or disciplinary measure that does not follow MSF's disciplinary process.

### B.5. Aggression



Aggression means any act or threat of physical harm.

**Examples:**

- Kicking, slapping, pushing, or hitting another person.
- Sending death threats to a person.
- Destroying personal property.

**B.6. Abuses related to the case management process**

**B.6.i. Retaliation**

- Retaliation is any deliberate negative action or omission taken against a person for making a report about possible abuse or cooperating in relation to such a report, in good faith.

**Examples of retaliatory measures:**

- Harassing behaviour.
- Transfer or change of duties, place of work or working hours, or reduction in salary.
- Scolding a person for making a report through the wrong channel.
- Ignoring or refusing to speak with a person for making a report.

**B.6.ii. Interference in a case**

- It means any act or attempt to deliberately prevent, influence or disturb the case management process related to a report of possible abuse.

**Examples:**

- Threatening to harm a complainant or whistleblower if they report possible abuse or cooperate in relation to a report.
- Destroying or hiding evidence connected to a case.
- Providing misleading information during an investigation interview.

**B.6.iii. False reporting**

- It means making a report or providing information about possible abuse that is deliberately false.

**Example:**

- Deliberately making a false report concerning possible abuse against a person to harm their reputation.

**B.6.iv. Breach of confidentiality**

- Confidentiality is broken when confidential information or data related to the case management process is shared with a third party in a manner not in line with MSF's regulations or applicable laws.

**Example:**

- A witness sharing or discussing confidential information related to an investigation with colleagues.

## **C. Inappropriate Behaviours**

This means behaviours, which do not amount to the forms of abuses outlined above, but also are not in line with MSF's behavioural standards and can negatively impact MSF's stakeholders, working environment, reputation, or the continuity and security of operations.

This includes, but is not limited to:

C.1. Inappropriate relationship: An intimate or romantic relationship between MSF employees or between an MSF employee and a person from the local community, which can negatively impact MSF's stakeholders, working environment, reputation, or the continuity and security of operations.

C.2. Inappropriate communication: Any spoken, written, or non-verbal language that is not respectful of others or their environment, even if it does not constitute an abuse. This includes using an aggressive, annoying or insulting tone.

C.3. Inappropriate management: Behaviour of a person placed in a supervisory position, which negatively impacts the working environment such as employee wellbeing or team cohesion.

C.4. Substance abuse: The use of alcohol or drugs by an MSF employee or representative in such a manner that it influences their behaviour or work and may affect the wellbeing or safety of MSF's stakeholders and/or the interests and reputation of MSF.

<sup>[1]</sup> Persons who are acting, or may be viewed as acting, on MSF's behalf but do not have an employment contract with MSF.

<sup>[2]</sup> The terms harassment and bullying are often used in similar ways in the working environment and can have the same impact on the affected person. Another term that is also used similarly is 'psychological harassment'.

<sup>[3]</sup> The BUs manage cases in an administrative process. They therefore do not qualify incidents of non-consensual sexual intercourse as rape since this is a criminal determination that should be made by the appropriate national court. They will however, recognize the outcome of a criminal case in which there is a finding of rape.

Annex 3 - Scope of CEC and Organo di Vigilanza (OdV)

	<b>CEC</b>	<b>OdV</b>
What is it for	The CEC Comitato Etico di Comportamento (or Behavioural committee) has been set up to take concrete action against any abuse to gain or exploit the vulnerability or inappropriate behaviours or violation of MSF values or social mission and to foster a safer and more inclusive environment in MSF.	The OdV (Organo di Vigilanza) has been set up to comply with the Italian Legislative Decree 231/2001, its main task is to supervise the concrete application of and compliance with the organisational model outlined in the code of ethics, to prevent any possible wrongdoing by the organisation.
How many members	3 volunteer members within which a coordinator	3 members within which a coordinator, only 2 of them are volunteers.
Guiding Principles	<p>No discrimination</p> <p>No abuse</p> <p>No exploitation of vulnerability</p> <p>No violence</p> <p>No personal gain or advantage</p> <p>No inappropriate relationship</p> <p>No inappropriate behaviour that can impact MSF image</p> <p>No mismanagement of people</p> <p>No abuse of substances</p> <p>To foster Diversity, Equity and Inclusion.</p> <p>The CEC action is rooted in the principles of confidentiality, independence and impartiality.</p>	<p>Medical Ethics</p> <p>Independence</p> <p>Impartiality</p> <p>Neutrality</p> <p>Transparency</p> <p>Integrity</p> <p>Inclusiveness</p> <p>Prudence</p> <p>Legality</p> <p>All the above is to be considered when in relation</p> <ul style="list-style-type: none"> <li>-to donors,</li> <li>-during healthcare activities,</li> <li>- to colleagues,</li> <li>- to consultants, partners and suppliers,</li> <li>- to the Italian public administration,</li> <li>- to media,</li> <li>-in relation to GDPR regulation,</li> <li>-when dealing with financial, economic and assets data,</li> </ul>

		<ul style="list-style-type: none"> <li>-in case of false or misleading information,</li> <li>-managing conflict of interest,</li> <li>-preservation of MSF IT assets,</li> <li>- work protection and safety, - environmental impact.</li> </ul>
Who is concerned	<ul style="list-style-type: none"> <li>• Staff, F2F, volunteers, interns, consultants and associative members within MSF IT premises or when on MSF IT events, associative or executive and when representing MSF externally or in other MSF offices.</li> <li>• All Fieldworkers, also when on field contract, within MSF IT office premises in their relationships with MSF-IT HQ employees or collaborators and volunteers (for example, during briefing/debriefing and events organized by MSF-IT)</li> </ul>	<ul style="list-style-type: none"> <li>• The Board members and whoever represents MSF-IT</li> <li>• MSF auditors (Revisori dei conti)</li> <li>• the MSF Staff (any kind of contract)</li> <li>• whoever acts on behalf of MSF or in MSF's interest;</li> <li>• all those who have a paid or even free relationship of any kind with the Organisation (such as, but not limited to, consultants, volunteers, suppliers and third parties in general)</li> </ul>
Who is NOT concerned	<ul style="list-style-type: none"> <li>• Fieldworkers have to report to the Behavioural Committees of the concerned Operational Center except in the cases specified above.</li> <li>• Patients</li> <li>• Donors</li> </ul>	<ul style="list-style-type: none"> <li>• Patients</li> <li>• Donors</li> </ul>
Consequences of breaches	Disciplinary actions until termination of employment, collaboration or volunteering for MSF-IT	Disciplinary actions until termination of employment, collaboration or volunteering for MSF-IT
What to read to know more	<ul style="list-style-type: none"> <li>• Responsible Behaviour Policy &amp; reporting procedure guideline</li> <li>• Msf International Behavioural commitments</li> </ul>	Code of Ethics
Regulations	MSF Behavioural commitments (approved in 2018 by the full EXCOM, the document is common to all MSF sections)	Legislative decree 231/2001 Code of Ethics (specific for the MSF-IT)
Examples of breaches	-Discrimination	-False or misleading information

	<p>-Sexual exploitation, abuse and harassment</p> <p>-Abuse of power</p> <p>-Aggression</p> <p>-Retaliation, interference in a case, false reporting breach of confidentiality (related to the case management process)</p> <p>-Inappropriate behaviour, relationship, communication and management</p> <p>-abuse of substances</p>	<p>-false financial transaction</p> <p>- MSF's resources appropriation</p>
How to contact it	<a href="mailto:cec@rome.msf.org">cec@rome.msf.org</a> .	<a href="mailto:odv231@rome.msf.org">odv231@rome.msf.org</a> <a href="https://forms.office.com/r/JGUtWXVPcu">https://forms.office.com/r/JGUtWXVPcu</a>
What is in common	<ul style="list-style-type: none"> <li>• The reporting procedure is protected by confidentiality.</li> <li>• All people concerned are responsible for knowing and complying with the principles and regulations.</li> <li>• Anyone is called to collaborate on the implementation of the principles stated above.</li> <li>• the CEC and the ODV exchange information and collaborate.</li> </ul>	
A relevant difference	<p>-The OdV has supervisory and control powers with own budget to investigate properly. After investigations can propose the adoption of the appropriate measures to implement and/or the imposition of the relevant sanctions.</p> <p>-Whereas the CEC is mainly available to receive complaints or allegations and investigate abuses although it is also involved in promoting actions to improve the inclusiveness of MSF and prevent inappropriate behaviours. The CEC is also in charge of conducting research and analysis on the data collected and to suggest implementation of preventive actions accordingly.</p>	