

# **Associazione Italiana Amici di Raoul Follereau**



## **Manual of Operational Policies and Code of Conduct 2020**

Unofficial English translation from the Original Document in Italian Language.  
Any interpretation must refer to the Italian version of the document.

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AIFO adopts the following policy and code of ethics document in support of its commitment to transparency and integrity in its activities. The operational policies and the included code of conduct must be observed by whoever acts for and on behalf of AIFO.



## **Section 1: Policy of the Italian Association Amici of Raoul Follereau and the Code of Conduct.**

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## **Section 1- Policy of the Italian Association of Amici of Raoul Follereau and the Code of Ethics**

### **1. 1 The Statute of the Association**

The Association called "Associazione Italiana Amici di Raul Follereau - A.I.FO. - Organization for International Health Cooperation" was established in accordance with art. 13 and following sections of the Civil Code and is a organization duly recognized by the Decree of the President of the Republic n. 561 / 3.07.1979; it is a non-governmental Civil Society Organization that has been recognized as suitable to manage cooperation programs in developing countries by decrees n. 196/0039 of 2.02.1978, n. 1988/128/4178 / OD of 14.09.1988, and by decree no. 2016/337/000115/0 of 4.4.2016 for the registration in the Public List of Civil Society Organizations (OSC) and other non-profit entities, pursuant to art. 26 of Law no. 125/2014. It is a non-profit organization dedicated to social progress, pursuant to Article 8 of Article 10 of Decree no. 460/97. The By-laws currently in force are the following "AIFO - By-laws text approved by the Extraordinary Shareholders' Meeting of 18-2-2017 (Notary deed Dr. Alberto Chiosi Rep. 808 rac. 519 - 18-2- 2017 Rome) available in full version on the website [www.aifo.it](http://www.aifo.it). Following the approval of the Italian Law on the Third Sector (Law 106/2016/2016 and DL 117 of 3.7.17), the AIFO Shareholders' Meeting of 23.6.2019 (Notary Deed Dr. Paride Marini Elisei Rep. 25314 rac. 8116 Rome) approved a new Statute that will be valid with the entry into force of the Italian Law on the Third Sector. It is registered in the Register of legal persons at the Prefecture of Bologna from 23.7.2001 to n. 15 page 57. Officially recognized as an official partner by the World Health Organization (WHO-DAR) since 1986.

### **1.2. The values**

Human, ethical and Christian values, as well as Raoul Follereau's message of life and love, form the background to the services that the Association provides to people and society; it is active in the field of human and social promotion, providing: (i) studies and management of humanitarian aid and international health cooperation projects, (ii) material and moral support to the most fragile people or those affected by Hansen's disease, (iii) social and health aid to help overcome the various causes of marginalization and economic and social crisis.

### **1.3. Headquarters**

The headquarters of the Association is in Bologna, Via Borselli n. 4-6. The Association is active in Italy and in other countries, particularly in developing countries, with decentralized offices.

### **1. 4. - Objectives and activities**

1. AIFO is a non-profit organisation. Its objective is the promotion of cooperation policies aimed at human development and the implementation of specific social and health programmes to combat underdevelopment, poverty, malnutrition and marginalization: phenomena that cause the persistence and spread of serious diseases, primarily Hansen's disease.

1.4.1. In order to pursue this goal, the Association:

- promotes, supports and coordinates activities aimed at combating poverty in the world, with particular attention to the most vulnerable and persons with disabilities through prevention, care and rehabilitation;
- promotes, supports and coordinates social and health programmes focusing on persons with disabilities and children, in particular through basic health interventions, rehabilitation programmes for person with disabilities and financial support to

communities that are forced to live in conditions of extreme hardship and deep economic and social crisis;

- contributes to the creation of a culture of peace, justice, solidarity and respect for the environment; a culture that aims to overcome the structural causes of poverty, oppression and all kinds of marginalisation;
- organises educational events on sustainable and inclusive development, global citizenship and inter-culture and, within this framework, professional development programmes, mainly aimed at students, teachers and school leaders in Italy, also providing relevant educational material; pursues the most effective relationship with Italians, foreigners and international public agencies in charge of promoting solidarity, cooperation and sustainable development policies, particularly in the health sector; collaborates also with other bodies and associations active in the same field and whose objectives correspond to its own.

1.4.2 In order to pursue its statutory purposes, the Association acts with particular attention to the following guidelines: educational activities aimed at supporters, members and managers; activities aimed at promoting membership and representation both in the social and ecclesial environment; planning, execution and control of events; development of financial resources and administrative management for the fulfilment of its statutory purposes.

1.4.3. The Association has the right to carry out, in compliance with its Statute and the Italian laws of the sector, any act, business and contract that is necessary or useful to pursue its statutory objectives, directly or instrumentally.

1.4.4. In addition to this document, AIFO Policy includes the following regulatory acts:

- a) Regulations for the functioning of the National Assembly (approved by the Board of Directors on 14.1.2006 no. 3, and subsequent additions), Regulations for the conduct of Regional Assemblies (approved by the Board of Directors on 9.2.2002 Del.29) and Electoral Regulations of the Association (approved by the Assembly on 29.11.208).
- b) Regulations for the functioning of the Bodies of the association and its local structures (approved by the Board of Directors at the meeting of 14.4.2014 Del. 41, and subsequent additions)
- c) Regulations for the functioning of the Board of Directors (approved at the meeting of the Board of Directors on 21.6.2008 no. 116)
- d) Organization, Administration and Accounting Regulations Ì (approved by the Board of Directors on 12.9.2009)
- e) Regulation on Conflict of Interest and the Internal Control Committee (approved by the Board of Directors on 4.10.2017 Del. 136).
- f) Guidelines for the Promotion and Management of initiatives abroad (approved by the Board of Directors on 29.5.2009), AIFO policies and guidelines on safety and protection of personnel operating in countries at risk (approved by management decision of January 2016).
- g) Regulations for the management of activities in the countries, with specific edition for the individual geographical areas (adopted by the Executive Board of 22.5.2017).



## **Section 2: Human resources policy, collaborations and services**

- 2.1. Fundamental principles and values
- 2.2. General guidelines
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## Section 2: Human resources policy, collaborations and services

### 2.1. Fundamental ethical principles and values

Our core values are based on creating a world where vulnerable populations, persons with disabilities, women and children, enjoy equal rights and opportunities. We believe in cultivating diversity and celebrating the unique talents that each person brings to the organization.

- a. **Inclusion:** We are committed to involving, supporting and recognizing the values of all members of society, regardless of race, religion, gender, nationality, ethnicity, age, physical or mental ability, socio-economic status and geography.
- b. **Integrity:** we are honest and transparent in all our work. We respect ethical codes of conduct that comply with national and international regulations, both in our professional activities and in our private lives.
- c. **Collaboration:** we are aware that our success is based on creating and promoting relationships with other organizations and associations aligned to the same values. Collaboration is at the heart of what we do, and we are committed to creating open solutions and platforms for collaboration.
- d. **Effectiveness:** We value efficiency and excellence in our work, constantly challenging ourselves to function better, exploring new opportunities, achieving and exceeding program goals, improving and deepening the impact of our interventions.
- e. **Innovation:** we are dedicated to research to find, develop and cultivate innovations that help improve the effectiveness of the work we do.

The responsibility of all personnel, in Italy and abroad, is entrusted to the Director by the Executive Board, within a framework of strict separation of roles and tasks between those who request hiring or retraining, those who assess the candidate and those who authorize and sign the employment contract, principles strictly applied both in Italy and abroad. The employee is required to strictly observe the work instructions from the Personnel Manager.

AIFO does not use, does not encourage or oppose the use of child labour, applies gender equality in labour relations, does not discriminate politically or for reasons of religion, disability, race and ethical origins, nationality, language, social origin.

No compensation or remuneration is provided for membership roles, and the activity of the members of the Association is carried out only on a voluntary basis.

**2.1.1 Fundamental principles** of diligence, loyalty, impartiality and good conduct that employees, volunteers and contractors are expected to observe:

- a. **Responsibility:** we believe that every person who works in AIFO is here because they feel passionate and responsible for the positive change we want to bring in the world. Each of us is constantly committed to increasing the impact of our work.
- b. **Trust:** we trust in the ability of each individual to make the best decisions and choices for himself and the association.
- c. **Dignity:** we believe that every person working in AIFO contributes equally to achieve the impact we are working on. We believe in building a community, where dignity comes from recognizing and appreciating the unique skills within us and others.

### **2.1.2 Fundamental ethical values** for employees, volunteers and collaborators:

Below are the values that help us achieve our goal of building a community of sustainable and inclusive development professionals committed to positive long-term social change:

- a. Sharing the construction of opportunities for marginalized communities, especially persons with disabilities.
- b. Be open to change and appreciate diversity.
- c. Bring innovation and creativity to our work.
- d. Take responsibility for our actions and decisions.
- e. To be motivated and autonomous.
- f. Seek support when needed and provide or seek opportunities for mentoring and guidance.
- g. Being in perpetual search for improvement and learning.
- h. Create spaces for collaboration and sharing.
- i. Demonstrate a high level of ethical sense and respect for international conventions in both professional and private acts and behaviour.
- l. Fully cooperate in reporting acts and behaviors that do not comply with the ethical standard adopted by AIFO.
- m. Accept possible sanctions in case of motivated and substantiated decision by the internal surveillance procedure in case of non compliance with the ethical rules adopted by AIFO.

### **2.2. General guidelines**

AIFO's human resources policy has been developed to provide general guidance on organizational policies and procedures. The purpose of this guide is to help staff, volunteers and collaborators to understand the advantages and obligations of working with AIFO. These guidelines are subject to changes, amendments or revocations by AIFO at any time, without notice.

AIFO will make available to every employee or collaborator a copy of this document.

All procedure and standard must be in any case compatible and fully respectful of both the Italian labour legislation that of the National Labour Contract applied in AIFO, which until now is the National Labour Contract of Commerce for employees from service sector companies in its latest version. In addition to the agreements governing labour relations, signed between the Trade Unions and the Associations of the Italian NGOs, for the cooperation and operators employed in cooperation and humanitarian aid projects. AIFO is in fact aware that its workers and employees carry out a peculiar and complex work whose protection is an ethically fundamental element. In this framework, AIFO Board of Directors has drawn up a Personnel Regulation delivered to the Internal Trade Union Representation on 30.1.2013 and signed by the employees on 8.3.2013, and other Regulations of operation in the countries where it is present, regulations that must in any case be approved by AIFO Management. AIFO in its actions also refers to the *Code of Ethics and Conduct* of the Italian Agency for Development Cooperation (<https://www.aics.gov.it/home-ita/trasparenza/codice-etico/>).

### **2.3. Recruitment, selection and appointment**

AIFO firmly believes that it is essential to hire the right person for the right job. The right person would not only meet the criteria of competence as described in the definition of the role and function, but also that he or she demonstrates to believe in the vision and values of the association and that he/she



commits to implement these same values and vision. The ideal candidate for any position must be willing to contribute to the life of the organization in the long term, taking personal responsibility for their role.

AIFO firmly believes in the development and growth of its internal talents to realize its vision. Therefore, for any vacant position, the association is committed to hire first the candidate available internally if suitable, before hiring staff from outside the organization, always in compliance with union regulations on the subject.

#### **2.4. Disciplinary and complaint procedures**

The Board of Directors of AIFO adopted at its meeting of October 14, 2017, the document on Conflict of Interest and the establishment of an Internal Control Committee, to verify the effective implementation and enforcement of the regulations and procedures adopted.

The role and the responsibilities of the Internal Control Committee are defined on the basis of the control standards generally accepted by other international NGOs or organizations similar to AIFO are inspired by national and international regulations, and report regularly to the Board of Directors. The majority of its members must be independent from the executive structure, and must also have a female component.

Employees and collaborators, within the framework of the provisions of the National Labour Contracts and the approved Internal Procedures, may submit complaints or requests to higher levels of authority, any sanctioning activity by the Employer must refer to the same regulatory framework .

The respective Service Managers and the Management will examine the matter and take a decision on it in accordance with the contractual regulations and procedures approved by the Board of Directors.

AIFO employees can use the organization's facilities for professional use only.

#### **2.5. Introduction of new employees**

The hiring of AIFO's employees or collaborators -whenever it occurs- depends only on the decision of the Employer and the Personnel Manager, who will have to participate also to the selection, on the basis of the Italian labor law and the specific resolutions of the Board of Directors.

The selection of personnel must be carried out through tests and documented with an appropriate report that also highlights any necessary training activities and is regularly recorded and archived. All future contractual and working conditions must be explained to the candidate in a transparent and complete manner.

AIFO makes sure that all new employees feel welcome and are ready to start work in a safe and competent way.

##### **Procedure**

- i. Reception - New employee is received, introduced to colleagues, and is provided with the documentation as in the following points,

- ii. Contract, Internal and management regulations, Disciplinary procedures, complaints procedures, Terms of service,
- iii. Organization's policies, Ethical Code of Conduct with particular attention to sexual exploitation and abuse and child protection policy,
- iv. Internal Staff Regulations,
- v. Knowledge of the organization and its history: information on the Mission and the current positioning of the Association, Leprosy and Disability Orientation, International Networks and Associations of which AIFO is part,
- vi. Services - Availability and rules of use of telephone, Internet, Computer, Printing, Photocopies
- vii. Services activities, job description, monitoring / supervision, evaluations, Procedures / Meetings, individual training needs,
- viii. Workplace health and safety - Rules and procedures in case of emergencies.

## **2.6. Exit from the association**

AIFO is committed to ensure that at the time of exit the employee leaves with good memories and, above all, as permanent ambassador of the association and its mission. Any employee who resigns on his or her own initiative is required to give written notice to the Director, in accordance with the terms and conditions of the individual and national contracts, with particular attention to the handover and final report, which he or she must deliver in any case, and to the entry of any replacement staff, so as to avoid any inconvenience to the activities of the association.

- **Return of objects and work tools.**

Employees are required to return all documents, books, office keys, laptop or any other resource belonging to AIFO, including all paper and electronic copies, to facilitate the handover and are bound to confidentiality.

- **Exit interview**

All employees leaving AIFO shall share with their Service Manager, or Senior Manager, the handover and an evaluation of their experience at AIFO.

The interview must be conducted in complete confidentiality.

- **Termination of service**

The service of an employee may be interrupted on the basis of the national employment Contract for the category, the Italian law or the individual contract.

## **2.7. Updating policies**

This document will be updated by the Board of Directors, upon proposal of the Management.



## **Section 3. Internal control policy, complaints, sanctions, and sanctions**

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### **3. Internal Control Policy, Complaints, Sanctions, and Complaints**

#### **3.1 The Internal Control Committee**

The Board of Directors of AIFO adopted in the meeting of October 14, 2017, the document on Conflict of Interest and establishment of an Internal Control Committee, which is entrusted with the effective implementation and application of the regulations and procedures adopted.

The role and responsibilities of the Internal Control Committee are defined on the basis of the control standards generally accepted by other international NGOs or bodies similar to AIFO, it will strictly respect national and international regulations and AIFO's contractual commitments. The majority of its members must be independent from the executive structure and must also have a female component.

Without prejudice to the responsibilities of the Employer, the Personnel Manager, the functions of the Board of Arbitrators (Proviviri), the statutory powers, the Internal Control Committee is responsible for handling complaints and grievances:

- Receiving complaints and workplace grievancies
- Launch and conduct the investigation according to the established procedure, carefully verifying all references to the legislation and regulations in place and their consequences.
- Sending results and recommendations to the Board of Directors
- Coordination with the employer in the implementation of the appropriate action
- Maintain the utmost confidentiality throughout the process according to established guidelines.

#### **3.2. Responsibilities of the Internal Control Committee**

To deal effectively with complaints, members of the Internal Control Committee must first be aware of their key responsibilities, some of which are highlighted below:

1. To be sensitized to ethical issues and to the code of conduct adopted by AIFO;
2. Know the law, guidelines, policy and/or standards of service relevant to and specific to the world of volunteering and international cooperation for sustainable and inclusive development
3. To guarantee the total harmony of its work with the Italian legislation in force
4. Ensure rigorous documentation of your activity.
5. Prepare the report with results / recommendations

#### **3.3 Tasks for the members of the Internal Control Committee:**

- Summarise information such as relevant documents and interviews conducted.
- Communicate effectively, write clearly, listen actively.
- Show empathy, be impartial and seek insights.
- Identify abuses and their impact
- Conduct a fair and informed investigation of complaints.

### **3.5 Definitions**

#### **3.5.1. Complainant**

A person of any age, whether employed or not, who claims to witness unethical behavior in the workplace or to have been subjected to any act of sexual misconduct or gender-based abuse.

**3.5.2. Denounced:** A person against whom a complaint of unethical behaviour in the workplace or sexual misconduct or abuse related to gender has been made.

**3.5.3. Employee:** a person employed at the workplace for any regular, temporary ad hoc or daily wage job

**3.5.4. Place of work:** any place where the injured party is present in relation to his/her work with AIFO.

**3.5.6. Employer:** as defined by the legislation and the Consolidated Law on Safety in the Workplace, the employer is the holder of the employment relationship with the worker, i.e. the person who has sole responsibility for the organisation itself as it exercises decision-making and spending powers.

### **3.6. Complaint history and action of the Internal Control Committee**

- The complaint must be made on the basis of existing national contracts and at the latest within 3 months of the date of the intended complaint.
- If a formal investigation is opened, the denounced shall respond with his or her justification within 10 days of receipt of the complaint.
- The final report of the Internal Control Committee is compiled and submitted to the Director of AIFO within 90 days from the start of the formal investigation. Meetings and virtual interviews are allowed.

### **3.7. Conciliation**

- The Internal Control Committee may, at the complainant request, before starting its investigations, take action to obtain conciliation between the complainant and the denounced, always in compliance with current legislation and union regulations.

### **3.8. Guidelines for receiving a complaint**

- The Internal Control Committee listens to the complaint and the complainant must be sure that AIFO takes seriously what has been submitted. When listening to the complainant, the words used by the complainant are recorded in a precise way.
- The Internal Control Committee must ensure that the description of the case is direct, simple and confirmed by the complainant.
- All notes are kept strictly confidential.
- The complainant's agreement to proceed with the formal investigation is accepted.
- The complainant is informed that, although the trial is confidential, the denounced must be informed as well as any witnesses and persons directly involved in the investigation procedure.

### **3.9. Complaint handling**

When a complaint is received, the Internal Control Committee shall:

- Obtain and record a complete and detailed account of the case.
- Ensure that the process for handling the complaint is understood by all.
- Check with the complainant on the next step: informal resolution or formal investigation.
- Keep a confidential record of all details of this investigation and subsequent steps in the process.

### **3.10. Prohibition of publication**

- The content of the complaint, the identity and personal details of the parties involved, any information concerning the conciliation and investigation procedure, the recommendations of the Internal Control Committee and the actions taken may not be published, communicated or made known to the public, the press and the media.

- Any person entrusted with the above documents is responsible for their preservation and confidentiality, in accordance with the provisions of the law and the rules of service, and may be sanctioned if it violates the confidentiality of the process.

### **3.11. Informal resolution**

Once a complaint has been received, the Internal Control Committee can only assess the possibility of conciliation if this is requested by the complainant. If the complainant chooses an informal resolution, the Internal Control Committee will use the following process:

- Inform the denounced and provide an opportunity to respond.
- Ensure that both sides understand their rights and responsibilities within the association policy.
- If possible, assess a satisfactory outcome for the complainant.
- Ensure strict maintenance of confidentiality.
- Monitor to make sure the harassing behavior doesn't recur.
- Once agreement is reached, it should be recorded that no further investigation of the same complaint will be conducted.

### **3.12. Formal investigation**

If an informal resolution is not possible and the complainant requests a formal investigation, the Internal Control Committee will endeavour:

- Offer justice to all involved.
- Hear all interested parties directly and separately.
- Interview the witnesses, separately.
- Keep a record of interviews and surveys.
- Guarantee strict confidentiality.
- Determine whether there is sufficient evidence to conclude that the reported facts have taken place.

### **3.13. Methods of investigation**

- The complainant must submit the complaint with documentary evidence, if feasible.
- Upon receipt of the complaint and after a first serious review, the committee sends a copy of the complaint to the denounced, verifying that the denounced's legal and trade union rights are fully respected and protected.
- The denounced receives the complaint and provides his or her response to the committee, or activates other means of legal protection.
- The Committee shall investigate the complaint in accordance with existing legislation.
- During the conduct of the investigation, at least three members of the Committee, including the Chairman of the Committee, must be present.
- The Committee verifies that all the legal rights of the complainant and the denounced are respected by the adopted procedure, asking if necessary for legal opinions to protect AIFO.
- The Committee's decision is final.
- The employer is obliged to act as recommended by the committee, while respecting his legal rights.

### **3.14. Provisional decision**

- During the formal investigation process, AIFO Management may decide an appropriate action to protect the parties involved, which may also include a change in the working modalities, in compliance with the contractual regulations.
- If the incidents are frequent and/or serious, AIFO management can resort to the suspension of the denounced, if supported by valid legal reasons.

- In case it is not possible to determine the truthfulness of the episode of unethical conduct, sexual misconduct or gender abuse, AIFO management can intervene to ensure the proper functioning of the workplace, without prejudice to the legal rights of the parties.
- AIFO Management will also continue to monitor the situation closely.
- In case a provisional decision is taken, due to the impossibility to determine the truthfulness of the facts, AIFO Management informs the Internal Control Committee about the action taken, in compliance with the legal rights of the parties.

### **3.15. Closure of the investigation**

- The Internal Control Committee may close the investigation process if both the complainant and the denounced are absent for three consecutive hearings without giving any reasons in writing.
- If the Committee comes to the conclusion that the complaint is fictitious, it may require the employer to take appropriate action against the complainant.
- The investigation is concluded with the decision of the Internal Control Committee which is final and with the obligation of the employer to act as recommended by the Committee, without prejudice to the legal rights of all parties involved.

### **3.16. Submission of annual reports**

- The Internal Control Committee is required to prepare and submit an annual report to the employer.
- The employer shall include in the annual report of the association to the Board of Directors the number of cases reported and their resolution or treatment under these regulations.



## **Section 4 - Health and safety policy**

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## **Section 4 - Health and safety policy**

### **4.1 Policy**

AIFO will provide, as far as possible, a safe working environment for the health, safety and well-being of our employees, contractors, visitors and the public who may be involved in our work, in compliance with the existing legislation and the roles of the responsible officials provided for by the same legislation, with particular attention to the personnel working abroad in difficult contexts of risk and conflict where ensuring their safety is our priority.

To do this, the organization will have to:

- provide information and training for employees,
- assess all risks before the start of work on new work areas,
- remove unacceptable safety risks,
- provide employees and contractors with adequate facilities (such as clean, fresh and clean toilets and clean drinking water and hygienic eating areas if required by current legislation)
- define precise security protocols in foreign countries to protect the personnel

### **4.2 Responsibility**

As far as Italy is concerned, AIFO, in compliance with the existing Italian legislation and with the Law Decree 81/2018, has appointed specific professionals of the sector and of the subject for the mandatory health and safety checks and responsibilities, and the employees have appointed their own Representative for safety issues. They have taken the necessary preventive measures to ensure the protection of safety in the workplace, including the relevant legal training for managers, workers and workers' representatives.

As a result, a competent occupational physician has been appointed to carry out health surveillance, as well as a technician with skills and requirements appropriate to the nature of the risks present in the workplace, in order to be able to organise and manage the system belonging to risk prevention and protection. AIFO periodically updates the relevant documentation required by law. In this framework of legislative compliance with responsibilities, everyone is responsible for ensuring health and safety in the workplace. Every employee and collaborator is responsible for his own health and safety when he goes in the field, and all the people responsible for the work activities of other employees are responsible for:

- identify practices and conditions that could harm employees, beneficiaries, members of the public or the environment.
- control such situations or eliminate the safety risk. If unable to control such practices and conditions, report them to their manager and that they are strictly adhered to in the foreign countries where the Security Protocol updated in January 2016 operates.

For the activities abroad AIFO, which is regularly accredited in the list of Law 125/14, has adopted protocols to govern and minimize the risks present, and to make the most of its knowledge of the territory and the communities in which it operates.

AIFO requires a positive and proactive attitude in protecting the health, safety and environment of all employees, regardless of their position.

### **4.3 Monitoring arrangements**

On the basis of the previous paragraph, current performance standards in the field of health and safety at work are monitored assiduously by means of the following:

- information and training on health and safety provided to staff, volunteers, interns, visitors and contractors, updating of documentation,
- highlighting and information risk assessment particularly in business travel,

- assessment of security conditions during missions abroad, according to the instructions of the Ministry of Foreign Affairs (MAECI) and the Development Cooperation Agency (AICS) as implemented in the Security Protocol adopted and updated in January 2016,
- related stress management and drafting of the related report.

#### **4.4 Complaint procedure**

In case the above mentioned principles are not applied, the complainant must:

- Take note of the circumstances, cases and any useful details
- Talk to the Management or the Board of Directors, and to the Workers' Safety Representative, who will involve the technical experts in charge
- Report the complaint to the Internal Control Committee.

#### **4.5. Complaint history and action of the Internal Control Committee**

- The complaint, as the case may be, is referred to the Internal Control Committee for investigation.
- If a formal investigation is opened, the final report of the Internal Control Committee is submitted to the Director of AIFO within 90 days from the opening of the formal investigation. Meetings and virtual interviews are allowed.

#### **4.6. Implementation of this policy**

AIFO will ensure that all the persons concerned are widely informed of this policy, and new employees as part of their insertion in the organization, especially those who will take up positions abroad and who must be guaranteed the insertion in a prepared and consolidated reality, in which to insert and connect. AIFO has adopted the "*Security Guidelines*" for its international cooperation activities, which have been approved with the following determination management of January 2016, and which have been integrated with the document "*Suggestions for risk management and the safety of the operators of international cooperation and solidarity organizations*" (<https://guidasanitaria.siscos.org/sicurezza/>) dossier prepared in September 2015 from the networks of OnG AOI, CINI, link 2007 in collaboration with the Crisis Unit of MAECI, which contains indications necessary for a risk assessment and to ensure the safety of operators involved in international cooperation projects. AIFO takes out adequate insurance policies (SISCOS, EuropeAssistance, CAES) for all expatriate personnel and registers them on the site *where we are in the world* ([www.dovesiamonelmondo.it](http://www.dovesiamonelmondo.it)). The staff is provided with the references of AIFO Emergency Communication System and of the Italian Embassy on site, with the relevant emergency and security services.

#### **4.7 Policy review**

The Health and Safety Policy will be reviewed at least once a year by the Director in collaboration with the Head of the Foreign Projects Department. The policy will be modified and integrated as necessary, upon proposal of the Director and approval by the President and the Board of Directors. The general principles of AIFO are in compliance with the provisions of the financing bodies and reference will be made to the rules of the European Union and the Italian regulations.



## **Section 5 - Gender policy**

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5.5. Complaint history and action of the Internal Control Committee

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## **Section 5 - Gender policy**

### **5.1. Politics**

AIFO believes in fairness and equality. Women and men are treated equally in all aspects with respect and dignity. The organization has zero tolerance for gender discrimination. Our ambition is to achieve gender balance in all our commitments.

The key objectives of the policy are to ensure that:

- No member or associate of the organisation discriminates on grounds of gender.
- Members and associates are aware of and promote gender equality.
- Organisational programmes contribute to improving gender equality.
- If gender discrimination occurs, a vigorous and timely investigation by the Internal Control Committee, shared with stakeholders as necessary, shall take place
- Appropriate disciplinary and legal measures shall be taken in all cases, where justified
- Take all appropriate and reasonable measures to stop gender discrimination.
- Systems and procedures to prevent gender discrimination should be reviewed.
- Gender equality is taken into account in the planning of activities.

### **5.2 Scope of gender policy**

1. Recruitment and entry on duties; performance appraisals; remuneration processes to ensure equal pay for equal work.
2. All services of the association and programmes supported must be carried out taking into account gender equality.

### **5.3 Responsibility in implementing gender policy**

Each AIFO Service is responsible for formally monitoring the implementation of this policy in its activities and reporting the results at least once a year. This will require a specific commitment by the Service Managers according to the scope of the activities carried out (Human Resources, communication, program, etc.). The implementation of the policy is the primary responsibility of the Directorate, but requires the participation of all units and offices.

The framework proposed in this policy is flexible and evolving, and will be updated to take account of experience and lessons learned, monitoring its implementation.

As with all the policies of the Association, checks can be made on the effective implementation of the Gender Policy at the request of the Management and in accordance with internal control requirements.

### **5.4 Complaint procedure**

In case the above mentioned principles are not applied, the complainant must:

- Take note of the circumstances, cases and any useful details
- Talk to the Director or a member of the Board of Directors.
- Report the complaint to the Internal Control Committee.

### **5.5. Complaint history and action of the Internal Control Committee**

- The complaint, depending on the case, is reported to the Internal Control Committee for investigation.
- If a formal investigation is opened, the final report of the Internal Control Committee is completed and submitted to AIFO Director within 90 days from the opening of the formal investigation. Meetings and virtual interviews are allowed.

### **5.6. Implementation of this policy**

AIFO will ensure that this policy is disseminated to all persons concerned. All new hires will have to incorporate this policy as part of their entry into the organization.

It will be a collective obligation and an individual obligation to implement the intention of this policy. This policy will be prominently shared in all AIFO Services.

All staff, volunteers, collaborators, associated organizations will be asked, also through self-certification when necessary if not provided for by contractual clauses, to comply, in the performance of their work, with the implementation of this policy, which will be evaluated as adherence to AIFO's quality of life.

The general guiding principles of AIFO on this issue will be in any case in compliance with the provisions of the different donors and particular reference will be made to the European Union guidelines and the Italian regulations in their updates.

The Director has been delegated by the Board of Directors to use these procedures pursuant to Resolution 136/17 - CA/DIR/PE (Document on Conflict of Interest and Internal Control Committee) of 14/10/2017.

### **5.7. Policy review**

AIFO recognizes the importance of monitoring this policy and the way it is used, including the number of cases, the way they have been treated and the recommendations made. The Board of Directors of AIFO will evaluate the effectiveness of this policy and will make the necessary changes.



## **Section 6. Policy for Prevention and Sanction of sexual harassment, exploitation and abuse**

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6.3. Employer's duties:

6.4. Definitions

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6.7. Conclusions

## **Section 6. Policy for Prevention and Sanction of sexual harassment, exploitation and abuse**

### **6.1. Purpose:**

The Italian Association of Amici of Raoul Follereau aspires to create a workplace free from misconduct in any form, based on respect for gender, color, religion, age, national origin, ethnic origin, disability, marital status, sexual orientation or any other work status protected by applicable international and national law and ethics. In order to maintain a safe and inclusive work culture, AIFO has zero tolerance on discriminatory behaviour. For this purpose AIFO intends:

- To promote, protect and ensure the full and equal enjoyment of all fundamental human rights and freedom of all persons, especially women, and to promote respect for their inherent dignity.
- Ensure that all staff, interns, volunteers, consultants and board members work together, feel responsible and share responsibility to encourage the development of an ethos that respects the dignity and human rights of all people in all their relationships and in all the contexts in which they work.
- Ensure that any victim or witness to abuse or exploitation is treated with dignity and concern primarily for his or her welfare and safety.

This policy applies to all staff, volunteers, collaborators, contractors and occasional employees' working for AIFO and it also applies to the visitors of AIFO offices worldwide.

This policy is a public document available among AIFO communication and identification material, it is shared with members, supporters, volunteers, consultants and interns and is an integral part of the agreements signed with partners.

### **Assistance and contact:**

For any professional assistance to support survivors and witnesses of sexual abuse AIFO indicates the complete list of anti-violence centers on the Italian territory, which are a constant and ramified garrison to eradicate gender violence, constantly updated at the link:

<https://www.adocnazionale.it/centri-anti-violenza-lelenco-completo/>

The Director has been delegated by the Board of Directors to use these services, as was already the case for the Register of Consultants pursuant to Resolution 27/2014 of 16.3.2014.

In the countries where AIFO operates, the appropriate national and international networks of assistance and support will have to be identified according to each specific context.

### **6. 2. Definition of the workplace:**

This policy covers all AIFO workplaces, including residential camps and foreign offices connected to AIFO.

### **6. 3. Employer's duties with regard to sexual exploitation, abuse and harassment:**

- Provide a work environment that includes safety in the gender relationships of the people who work there.

- Inform about the criminal consequences of sexually motivated and discriminatory behavior in the workplace or in providing assistance, raising the awareness of employees and collaborators and beneficiaries. Also through AIFO's media networks.
- Provide the necessary structures for complaint handling and investigation activities.
- Making available information relevant to complaints submitted, in full compliance with existing legislation
- Provide assistance to people who decide to complain about gender-based abuse or violence
- Treat sexual misconduct as a serious breach of the Code of Conduct and take disciplinary action in full compliance with existing legislation
- Monitor the timely submission of reports by internal supervisory mechanisms.

## **6.4. Definitions**

### **6.4.1. Sexual harassment, exploitation and abuse**

Sexual misconduct includes any unwanted behavior of a sexual nature that makes someone feel offended, humiliated or intimidated. It includes situations in which a person is the object of sexual attention as a condition related to his or her occupation, as well as situations that create a hostile, intimidating or humiliating environment for the recipient. It is important to know the difference between "Sexual Exploitation and Abuse (SEA) and sexual misconduct. In both instances sexual misconduct is perpetrated by personnel of Agencies or their partners. However, the survivors of SEA are beneficiaries or community members, while the survivors of sexual misconduct are personnel of Agencies or partners themselves. The rules of conduct defined here include both cases.

**6.4.2** Sexual misconduct may involve one or more incidents and actions that may constitute physical, verbal and non-verbal misconduct. Examples of contact or behavior that constitute sexual misconduct include, but are not limited to:

- Physical: unwanted physical contact including caressing, pinching, kissing, hugging, touching inappropriately, physical violence for a sexual attack.
- Verbal: comments on a worker's appearance, clothing, body, age, private life, gender.
- Sexual: comments, stories and jokes, the use of work-related threats or rewards to solicit sexual favors.
- Non-verbal: display of sexually explicit or suggestive material, sexually suggestive gestures, persistent observation, whistling.
- Sexually motivated approaches: repeated and unwelcome social invitations for appointments or physical intimacy, insults based on the employee's gender, condescending or patronizing comments, and sending sexually explicit messages (by phone or email).
- 

**6.4.3** Sexual misconducts that lead to sexual harassment, exploitation and abuse, include, but are not limited to :

- Implicit or explicit promise of preferential treatment for colleagues in the workplace or in providing assistance to beneficiaries
- Implicit or explicit threat of injurious treatment to colleagues at work or beneficiaries in providing assistance
- Implicit or explicit threat to the present or future employment status of colleagues or the rights of the assisted person
- Intimidating, offensive or hostile interference to the work of colleagues or the rights of the person being assisted



- Humiliating, sexually motivated treatment that may affect the health or safety of the worker or of the person being assisted and their family members.

### **6.5. Guidelines for field personnel**

AIFO female staff, who for work needs must make home visits in the countries where AIFO operates, must have a seniority of at least one month of service in AIFO, and make them in the company of a staff member with experience in the field. In such cases the following precautions must be respected:

- a) Ensure that the daily visit plan is known to those responsible to enable movements to be tracked.
- b) In case the family environment does not favour a therapy / home visit, assistance will be provided at a community centre.
- c) Submit an immediate report in cases of misconduct to the Service Manager and the authority giving details of such cases.

### **6.6 Complaint procedure**

The complainant who believes he was sexually harassed must:

- If he is able to do so, inform the alleged harasser that his behavior is offensive, unwelcome, against the organization's policy and should stop.
- You must make a note of the date, time and place of the accident(s).
- If you are unable to deal with the alleged harasser or if the undesirable conduct continues, report it to the service manager or other persons in authority.
- If this is not appropriate or possible, speak to another senior member of the organization, the Director or a member of the Board of Directors.

### **6.7. History of the complaint and involvement of the Internal Control Committee**

- The complaint must be submitted to the Internal Control Committee, if possible quickly. Depending on the circumstances, the complaint may be filed without time limit if the complainant has been inhibited by a feeling of reprisal for his or her working conditions.
- After receiving the complaint, any informal resolution between the complainant and the complainant must be reached within 2 weeks.
- If a formal investigation is opened, the complainant shall respond with his or her justifications within 10 days of receipt of the complaint, without prejudice to the legal rights of the complainant.
- The final report of the Internal Control Committee is compiled and submitted to the Director of AIFO within 90 days from the start of the formal investigation. Meetings and virtual interviews are allowed.
- An annual report on cases of sexual exploitation and sexual abuse must be submitted to the Board of Directors.

### **6.8. Implementation of this policy**

It will be a collective obligation and an individual obligation to implement the purpose of this policy. This policy will be shared in all AIFO offices and must be clearly communicated to every AIFO employee or collaborator.

All staff, volunteers, collaborators, associated organizations and will be asked, even if necessary through self-certification if not provided for by contractual clauses, to share in the performance of their work the implementation of this policy, which will be evaluated as a quality adherence to the life of AIFO.

The general guiding principles of AIFO on this issue will be in any case in compliance with the

provisions of the different financing bodies and in particular reference will be made to the European Union guidelines and the Italian regulations in their updates.

#### **6.9. Review of sexual harassment, exploitation and abuse policy**

AIFO recognizes the importance of monitoring this policy and the way it is used, including the number of cases, the way they have been treated and the recommendations made. The Association will evaluate the effectiveness of this policy and will make the necessary changes.



## **Section 7 - Minors and vulnerable adults safeguarding policy**

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7.12 Policy on safeguarding of minors and vulnerable persons

## **Section 7 - Minors and vulnerable adults safeguarding policy**

### **7.1 Definition of minors**

AIFO has always been committed to protecting children's rights, including their right to protection from harmful influences, abuse and exploitation.

AIFO takes active measures to ensure that the rights to the protection of children are fully guaranteed and implemented.

AIFO recognizes its responsibilities in complying with legislation, in particular to ensure that the safeguarding of children and young people is fundamental, and will constantly monitor activities in this field.

AIFO's policy on child protection is based on and complies with the United Nations Convention on the Rights of the Child (1989).

### **7.2 Awareness creation**

The child protection policy is part of the information activities of the organization in which new employees and collaborators of AIFO participate. Moreover, all employees, volunteers, collaborators and service providers by signing the cooperation contract also formally commit themselves to respect AIFO's policy of child protection.

### **7.3 Scope of child safeguarding policy**

AIFO and its employees must follow this policy very carefully. The purpose of this policy is to raise awareness on child protection and on how to prevent and report child abuse by all those involved in AIFO's activities. This policy applies to:

- AIFO, the Board of Directors, all staff, consultants, interns and volunteers, service providers.
- Partner organisations in the projects: all staff (part-time and full-time), board of directors, consultants, interns and volunteers.
- Other employees: all suppliers, service providers and donors (institutional and individual).

All stakeholders must comply with AIFO's Minors and vulnerable adults safeguarding policy.

#### **Assistance and contact:**

For any professional assistance to victims and witnesses of child abuse AIFO indicates a list of contacts, at national level, which is continuously updated. <https://azzurro.it/contatti/>

The Director is delegated by the Board of Directors to use these services, as was already the case for the Register of Consultants pursuant to Resolution 27/2014 of 16-3-2014.

In the countries where AIFO operates, the appropriate national and international networks of assistance and support will have to be identified according to each specific context.

## **7.1 Behavioral protocol and code of conduct**

AIFO and the stakeholders in contact with AIFO must:

- Never abuse and / or exploit a child and act / behave in any way that could endanger or harm a child.
- Report any problems of child abuse or protection according to applicable procedures.
- Responding to a child who may have been mistreated or exploited in accordance with applicable procedures
- Cooperate fully and confidentially in any investigation of doubts and allegations.
- Contribute to an environment where children are respected and encouraged to discuss their concerns and rights.
- Always seek the consent of young people (or, in the case of children, seek the consent of their parents or guardians) before taking pictures (e.g. photographs, videos). Respect their decision about their image. Make sure that any picture taken is respectful (e.g.: children must have appropriate clothing covering all sexual organs. Images of children in sexually suggestive poses or which in any way adversely affect their dignity or privacy are not acceptable) Stories and images of children must be based on the best interests of the child.
- Be aware that where there are concerns about the behaviour of staff or employees in relation to the protection of children and/or in the event of a violation of the child protection policy, this will be examined under this policy or by considering referral to the statutory authorities.
- Be aware that AIFO will terminate all relationships with any associate or visitor who has demonstrated to have committed child abuse.
- Be aware that if a legitimate concern is raised about suspected child abuse that proves unfounded in the investigation, no action will be taken against the complaint.
- Be aware that AIFO will take legal or other actions against members or visitors who make false and harmful accusations of child abuse.
- Do not disclose information identifying families or children and make it available to the public without the explicit consent of AIFO.

## **7.2 Protection of minors in external programs**

AIFO's child protection policy applies both inside and outside AIFO's premises, including social events, trips, training sessions or conferences sponsored by the association.

All written material, spoken words, photographs or images of children used by AIFO and the parties concerned must be used with integrity to respect and promote the dignity and honor of children and their families.

## **7.3 Partner organizations, Suppliers / agreements**

AIFO and all related realities must follow the policy of child protection. Any violation of the policy will lead to the closure of the contract or agreement.

#### **7.4 Internal Control Committee**

The Internal Control Committee, defined in its composition and operation in Section 3 of this Policy Manual, is the responsible body that can receive complaints, conduct investigations and give guidance and assessments of the employer's responsibility.

Any violation of the child protection policy must be reported to the Internal Control Committee.

#### **7.5 Complaint procedure**

Anyone who is aware of the violation of child protection should, if possible, inform the alleged person that his or her conduct is unwanted and unwelcome.

Anyone can turn to one of the designated responsible persons to submit complaints of violation of the protection of minors.

Confidentiality will be maintained in the process, while respecting the rights of the parties involved.

#### **7.6 Responsibilities of the Internal Control Committee in child protection.**

- Go through the complaints.
- Decide whether to activate a formal or informal investigation.
- Listen to the stakeholders. Virtual meetings are allowed.
- Issue a decision and communicate it to the Management, the Board of Directors and interested parties.
- Draw up an annual report on the complaints handled.

#### **7.7 Implementation of this policy**

AIFO ensures that this policy is widely communicated to all persons concerned, with particular attention to newly hired staff.

It will be a collective obligation and an individual obligation to implement the purpose of this policy. This policy will be shared in all AIFO offices and it is expected that each employee will receive a specific information.

All the staff, volunteers, collaborators, associated organizations will be asked, if necessary also through self-certification in case there are no contractual clauses, to comply, in the performance of their work, to the implementation of this policy, which will be evaluated as adherence to AIFO's quality of life.

AIFO's general guiding principles on this issue will be in compliance with the provisions of the different donors and in particular reference will be made to the European Union and Italian legislation in their updates.

#### **7.8 Policy review**

AIFO recognizes the importance of monitoring this policy and the way it is used, including the number of cases, the way they have been treated and the recommendations made. The Association will evaluate the effectiveness of this policy and will make changes if necessary.

## **7.9 Policy on the safeguarding of minors and vulnerable adults.**

More specifically and within the above established policy AIFO is aware that its work can directly involve children, young people and adults with disabilities in various programs and projects, and that it has the responsibility to promote and guarantee the rights, well-being and safety of all. It believes that it is always unacceptable for a person to suffer abuse or exploitation of any kind, and works to ensure that actions or behaviour that may be inappropriate or potentially abusive towards children and vulnerable adults are always avoided in their activities.

AIFO is committed to always implement a safeguard policy towards them and to ensure that this policy is obligatorily applied to all employees and collaborators, seconded personnel, volunteers, workers of foreign offices, partners working on behalf of AIFO with any function, and in all its activities such as humanitarian and emergency projects, fundraising, awareness raising and communication activities.

AIFO refers to the UN Convention on the Rights of the Child (Convention on the Rights of the Child), approved by the General Assembly of the United Nations on 20-11-1989 and ratified by Italy with Law n. 176/1991, to the Hague Convention of 13-1-2000, adopted by the European Parliament in its working document on the protection of vulnerable adults of 24- 11-2015.

AIFO undertakes to monitor and evaluate the implementation of this policy and to ensure that it is regularly checked and updated if necessary.



## **Section 8 - Policy on human trafficking and forced labour.**

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## **Section 8 - Policy on human trafficking and forced labour.**

### **8. 1. Definition**

Human trafficking and forced labour are still today the major components of modern slavery with the following characteristics:

- compulsion to work - by coercion or mental or physical threat;
- restriction of rights and control by an "employer" through mental or physical abuse or the threat of abuse;
- dehumanizing, treated as a commodity bought and sold as "property";
- physically bound or restricted in their freedom of movement.

### **8. 2. Forms of modern slavery**

- Forced labour - any work or service that people are forced to do against their will under the threat of some form of punishment.
- Debt slavery: the most widespread form of slavery in the world, when people borrow money they cannot repay and are forced to work to repay the debt, thus losing control of the conditions of both their employment and their debt.
- Trafficking in human beings: involves the transportation, recruitment or harbouring of persons for the purpose of exploitation through violence, threats or coercion.
- Slavery based on descent: where people are born as slaves because their ancestors were captured and enslaved; they remain in slavery by descent.
- Child slavery: Many people often confuse child slavery with child labour, but it is much worse. While child labour is harmful to children and hinders their education and development, slavery occurs when a child is exploited for someone else's gain. It may include child trafficking, child soldiers, child marriage and child domestic slavery.

AIFO more than rigorously respects what is established at every level by our law and in particular by the Law 228/2003, by the D Lg. 24 of 2014 on the exploitation for the removal of organs, by the Directive 2004/81/EC of the European Council, and by what is recommended by the anti-trafficking agencies.

### **8. 3. International Regulations**

A set of existing international standards and emerging national laws, based on the United Nations Guiding Principles on Business and Human Rights (UNGPR), emphasise the role of economic actors in identifying and avoiding human rights risks, including the risk of modern slavery, human trafficking and forced labour, with *due diligence*.

According to the United Nations Guiding Principles on Business and Human Rights (UNGPR), companies/organisations should have in place "a human rights *due diligence* process to identify, prevent, mitigate and account for how economic actors act on human rights".

Article 2(e) of the United Nations Labour Agency (ILO) Protocol on forced labour calls on Member States to take measures "to support *due diligence* by the public and private sectors to prevent and respond to the risks of forced or compulsory labour".

*Due diligence* legislation enables companies to demonstrate that they are taking all necessary measures to identify, prevent and mitigate the effects of modern slavery on their operations and supply networks.

Some national *due diligence* laws also include provisions which, in certain circumstances, allow civil and criminal proceedings to be brought against economic persons who do not perform the necessary due diligence.

#### **8. 4. Application in AIFO of the principles against human trafficking and modern slavery.**

AIFO is committed to ensuring that there are no cases of modern slavery or trafficking in human beings within its global organization or its supply networks. It has a strict zero-tolerance approach.

Training to raise awareness of modern slavery and how to denounce it is incorporated into our training on awareness of criminal practices, which is mandatory for all staff as part of their induction course. In case they have not attended it, training sessions for staff in this subject are scheduled.

AIFO focuses on ethical and responsible business practices in global supply networks and will continue to review and improve in this area.

Having assessed the risks of trafficking and abuse identified under the National Action Plan for Business and Human Rights 2016-2021, AIFO considers that the potential risks are no less related to the activities in Italy and in the other countries where we operate and we are committed to high levels of supervision everywhere. If it was suspected that a supplier is involved, at any level, in modern slavery, the interaction with that supplier would immediately cease.

AIFO's global policy states that contract activities should not support organizations involved in criminal activities such as fraud, corruption, forced labour (modern slavery) and other human rights violations.

Adherence to AIFO's purchasing and procurement policy is included in routine internal audits.

For high-value or high-risk contracts, a pre-qualification questionnaire requires suppliers to state whether they, or anyone in their network, has been involved in crimes under anti-trafficking and forced labour legislation. Suppliers are also required to state whether they use subcontractors and whether they have processes in place to verify whether any of the above circumstances apply to their subcontractors.

Before contracts are awarded, *due diligence* checks are carried out on suppliers. The level of *due diligence* undertaken is related to the value of the procurement and the nature of the goods purchased.

*Due diligence* is carried out at the national office level and includes, but is not limited to, numerous checks of official reference lists, which contain names of persons or organisations known to be involved in the financing of crime, terrorism,

human trafficking and forced labour, background checks and appropriate site visits. In some cases donors may also require additional specific *due diligence* activities to be carried out.

### **8.5 Complaint procedure**

If the above mentioned principles are not applied, the complainant should:

- Take note of the circumstances, cases and any useful details
- Talk to the Director or a member of the Board of Directors.
- Report to the Internal Control Committee.

### **8.6. Complaint history and action of the Internal Control Committee**

- The complaint, depending on the case, is reported to the Internal Control Committee for investigation.
- If a formal investigation is opened, the final report of the Internal Control Committee is completed and submitted to AIFO Director within 90 days from the opening of the formal investigation. Meetings and virtual interviews are allowed.

### **8.7 Implementation of this policy**

AIFO will ensure that this policy is widely disseminated to all those concerned. All new employees will have to implement this policy as part of their entry into the organization.

It will be a collective obligation and an individual obligation to implement the aims of this policy. This policy will be prominently shared in all AIFO offices and it is expected that every employee will receive special training.

All staff, volunteers, collaborators, associated organizations will be asked, possibly also through self-certification if not provided for by contractual clauses, to share in their work the implementation of this policy, which will be evaluated as a quality adherence to AIFO's life.

The general guiding principles of AIFO on this issue will be in accordance with the provisions of the different financing bodies and in particular reference will be made to the European Union and Italian legislation also in their updates.

### **8.8 Policy review**

AIFO recognizes the importance of monitoring this policy and the way it is used, including the number of cases, the way they have been treated and the recommendations made. The Association will evaluate the effectiveness of this policy and will make the necessary changes.



## **Section 9 - Conflict of interest**

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## **Section 9 - Conflict of interest**

### **9.1. The policy**

At the meeting held on 14 October 2017, the Board of Directors adopted Resolution no. 136, the Regulation on Conflict of Interest and the Internal Control Committee.

The Board of Directors has decided to ensure clear measures to avoid any possibility of conflict of interest or profit benefits to its members to ensure that the association is managed with high level transparency and adheres to the fiduciary principles of the association.

The measures and evaluations provided for in Resolution no. 136 of 14 October 2017 are extended to all staff, volunteers, collaborators and associated organisations.

### **9.2 The key objective of the policy is to ensure that:**

No member of the association may benefit from the resources of the organisation, either directly or indirectly, to the detriment of the integrity of the association.

### **9.3 Application of the conflict of interest policy.**

The following actions will be investigated:

- Any purchase made in which the members of the association or their collaborators are the suppliers.
- Hired persons who are members of the family of members of the association.
- Contracts for services that are signed with a member of the organization or their family members, companies / societies.
- The facilities used that belong to a member of the association or their families and payments made directly to them
- Goods / facilities of the organization used by any member of the association

### **9.4 Conflict of interest assessment process**

The President and the Director have control over the above matters.

However, they are required to follow the following principles:

- They will evaluate a written note explaining why such services or contracts or purchases must be given to a company / company related to a member of the association or his/her immediate family members.
- They will examine the case in detail, make their own assessment and always explore whether the case is detrimental to the integrity of the association.
- In cases considered at their discretion not to be prejudicial or discriminatory, they shall take the decision and inform the line manager accordingly.
- In cases considered prejudicial at their discretion, they may request additional information or reject the case.

### **9.5 Monitoring and complaints**

Possible conflicts of interest will be monitored and reported to the director or the chairperson by all members of the association. If appropriate, complaints and grievances will be referred to the Internal Control Committee for evaluation. The chairman and the director may also consult the Internal Control Committee for the cases submitted.

### **9.6 Complaint procedure**

If the above mentioned principles are not applied, the complainant should:

- Take note of the circumstances, cases and any useful details
- Talk to another senior member of the organization, the director or a member of the board of directors.
- Report the complaint to the Internal Control Committee.

### **9.7. Complaint history and action of the Internal Control Committee**

- The complaint, depending on the case, is reported to the Internal Control Committee for investigation.
- If a formal investigation is opened, the final report of the Internal Control Committee is completed and submitted to AIFO Director within 90 days from the opening of the formal investigation. Meetings and virtual interviews are allowed.

### **9.8. Implementation of this policy**

AIFO will ensure that this policy is widely disseminated to all those concerned. All new employees will read and understand this policy as part of their introduction into the organization.

For the contracts of all staff, volunteers, collaborators, suppliers, a specific and certified check will be carried out, in the margin of the contract, on the negative outcome of the verification of the existence of conflicts of interest.

The general guiding principles of AIFO on this issue will be in accordance with the provisions of the different financing bodies and in particular reference will be made to the European Union and Italian legislation also in their updates.

### **9.9. Sanction**

Cases of conflict of interest which, following investigation, will be identified, will be sanctioned according to the internal processes of the association and in the most serious cases reported to the public authorities.

### **9.10. Policy review**

AIFO recognizes the importance of monitoring this policy and the way it is used, including the number of cases, the way they have been treated and the recommendations made. The association will evaluate the effectiveness of this policy and make the necessary changes.



## **Section 10 - Anti-corruption and whistle-blowing Policy**

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## **Section 10 - Anti-Bribery and Whistle-blowing Policy**

### **10.1 Politics**

The organization has zero tolerance for fraud and corruption. All AIFO stakeholders must ensure clear measures to avoid any possibility of fraud and corruption. The separation between those who manage technical and administrative aspects related to financial initiatives and those who decide and approve contractual aspects, in a strict separation of roles.

### **10.2 The key objectives of the policy:**

- No member of the association allows acts of corruption either directly or indirectly.
- Any transaction does not involve fraud
- Develop, maintain and consistently apply effective controls to prevent fraud and corruption at all levels
- Ensure that in cases of fraud or corruption a vigorous and timely investigation is carried out and that reports are shared with stakeholders as appropriate
- Take appropriate disciplinary and legal measures in all cases, where justified
- Take all appropriate and reasonable measures to recover any financial losses
- Review systems and procedures to prevent fraud or corruption
- Ensuring that the risks of fraud and corruption are taken into account in programme planning
- Report incidents to donors as required

Fraud and corruption are ever-present threats to our assets and reputation and should therefore be a concern of all stakeholders. Any person in the association who commits or condenses to fraud and corruption should be sanctioned after the investigation.

### **10.3 Whistle-blowing policy**

#### **10.3.1 Introduction**

AIFO aims to maintain the highest standards of transparency, integrity and responsibility in its work. Anyone working with or for AIFO must be vigilant for signs of illegal or criminal activities by individuals or organizations working with or for AIFO and are encouraged to report such behavior using this policy.

This is a global procedure and applies to employees, workers, volunteers, partner organizations, donors, suppliers, agents, contractors or subcontractors of AIFO or any person associated with AIFO wherever they are located.

AIFO will not tolerate intimidation or victimization of anyone who raises a complaint under this policy. Anyone who tries to discourage, intimidate or victimise an individual in an attempt to prevent the reporting of a suspicious case will be subject to appropriate formal sanctions and, if necessary, may be reported to the competent external authorities.

AIFO recognizes itself in the anti-corruption and anti-fraud strategy of the European Commission and in the related regulations, adopting all the instruments and procedures suggested in the internal control.



and accounting systems, including the separation of functions and multiple certification systems, as well as the Italian legislation provided for by Law 190/2012.

### **10.3.2. What needs to be reported**

An act to be reported in the public interest by an individual who has a reasonable belief that one of these acts has been or is likely to have been committed:

- Criminal offences (e.g. fraud, corruption, money laundering, modern slavery, support or involvement in terrorism).
- Failure to comply with legal obligations or regulatory requirements;
- Non-compliance with accounting and administrative control procedures
- Putting someone's health and safety at risk.
- Crimes against the environment.
- Coverage of wrongdoing.
- Unethical conduct.

Individual problems (e.g. bullying, harassment, sexual exploitation and abuse, discrimination) must be reported according to AIFO's complaint policy to the Internal Control Committee.

Reporting a suspicious case when there is no clear evidence to do so could result in disciplinary action or other sanctions.

### **10.3.3. Procedure**

Reports should be raised as soon as possible. Reports may be raised verbally but preferably in writing, providing the background to the cases, including relevant dates and witnesses.

First, you must raise the case with your immediate supervisor. However, if the line manager is involved in wrongdoing or is unable to raise the matter with this person specifically, the case should be reported to one of the following:

- Directly to the Management and the Internal Control Committee.
- By sending a written note for the attention of the President.

An investigation will then be carried out, which, depending on the case, may be entrusted to the Internal Control Committee, which will act according to the procedures described in section 3 of this Manual.

The report must not be investigated by the person who submitted it, this could result in the destruction or contamination of evidence or jeopardise their own safety.

Following the investigation, the person who made the report will be informed of the outcome. However, the need for confidentiality may mean that it is not possible to provide many details. All information provided about the investigation must be considered strictly confidential.

### **10.3.4 Anonymity**

Anyone intending to report a case that falls within the typology described above is encouraged to use their own name. Reports expressed in anonymous form will be considered at AIFO's discretion, taking into account:

- The seriousness of the issues raised.

- The credibility of the report.
- The likelihood of confirming the accusation from attributable sources.

### **10.3.5 Confidentiality**

AIFO will treat these reports as confidential. The identity of the person submitting an alert shall be protected. The report may be kept confidential as long as it does not hinder or frustrate any investigation.

However, the investigation process may reveal the source of the information and the reporting person may have to provide a statement as part of the evidence required.

### **10.3.6 External signaling**

If, at the end of the internal procedure, the person submitting an alert considers that no action has reasonably been taken, he or she could report the matter to external supervisory bodies.

### **10.3.7 Harmful allegations**

Individuals who make harmful allegations under this policy, such as those that are untrue, may be subject to disciplinary action or censorship.

## **10.4 Implementation of this policy**

AIFO will ensure that this policy is widely known to all concerned. All new employees will implement this policy as part of their entry into the organization.

## **10.5 Policy review**

AIFO recognizes the importance of monitoring this policy and the way it is used, including the number of cases, the way they have been treated and the recommendations made. The Association will evaluate the effectiveness of this policy and will make the necessary changes.

The general principles of AIFO will be in compliance with the provisions of the different financing bodies and in particular reference will be made to the rules of the European Union, to the Italian legislation also in their updates.



## **Section 11 - Environment and sustainability policy**

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11.1 Objectives

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11.3 Responsibility

11.4 Possible outcomes of the environmental assessment

11.5 Key points for AIFO in environmental assessment

11.6 Review of environmental and sustainability policy.

## **11 - Environmental and sustainability policy**

### **11.1 Goals**

Ensuring environmental sustainability is an integral part of the Sustainable Development Goals of the UN Agenda 2030, to which AIFO adheres. Besides being a fair goal in itself, improving environmental sustainability, it makes a vital contribution to the achievement of the other goals, as the environment is very important for people living in poverty. It affects their livelihoods and health, increasing their vulnerability to external shocks.

### **11.2 Politics**

This policy aims to reinforce the evaluation process during the design phase of an intervention. Environmental assessment is not a single action, but a process that takes place throughout the project cycle. Environmental impact must be taken into account during the identification, design and implementation, review and evaluation of international development cooperation projects.

### **11.3 Responsibility**

Environmental impact assessment is the responsibility of the project managers.

It is also the responsibility of the project manager to ensure that the measures identified during the evaluation are effectively implemented and that the relevant activities are reflected in the project text and the logical framework.

### **11.4 Possible outcomes of the environmental assessment**

- No further action is necessary because no significant opportunities or risks to the environment have been identified.
- Identification of the environmental opportunities and risks that need to be managed to ensure both maximum benefit for the most vulnerable and eco-sustainability of the surgery.
- Identification of the need for further studies - in some cases environmental studies will be needed to make informed decisions. The results and recommendations of these studies will be incorporated into the design of the intervention.
- Assignment of responsibility and accountability of personnel - the actions necessary during design or implementation that should be assigned to a specialist.
- Decision that the intervention is inappropriate - an intervention may go beyond the identification and formulation phase and reach the implementation phase before a serious environmental risk is evident. The assessment may recommend that the intervention should not continue in its current form.

### **11.5 Key points for AIFO in environmental assessment**

- Consider gender aspects in the environmental assessment. Women living in rural areas are often more vulnerable to environmental degradation due to inequality in access to land. Women in urban and low-income areas can be particularly vulnerable to environmental risks at home and in the workplace.
- Consider the environmental impact of interventions on different social groups and in particular the most vulnerable, disabled and elderly people.
- Include representatives of vulnerable people with disabilities, strengthen environmental measures that increase accessibility and break down existing barriers.

- Include representatives of vulnerable people with disabilities in the preparation and implementation of disaster risk reduction plans to limit their impact on the most vulnerable.

#### **11.6 Review of environmental and sustainability policy.**

The policy on environment and sustainability will be regularly reviewed by the Director in cooperation with the Heads of Service and Foreign Projects Office. The policy will be amended as appropriate and will be supplemented by additional statements, policies or procedures, upon proposal by the Director and approval by the Chairman and the Board of Directors.

The general principles of AIFO will be in compliance with the provisions of the different financing bodies and in particular reference will be made to the rules of the European Union and the Italian legislation in their updates.



## **Section 12 - Photo and Video Consent Policy**

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12.1. The policy

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## **Section 12 - Photo and Video Consent Policy**

### **12.1. The policy**

AIFO respects the rights and privacy of all interested parties. A good practice to record a quote, a photo and a video is to obtain written consent when possible, in particular when confidential, personal and private information is revealed in the photo or in the corresponding quote.

AIFO is aware that the way individuals and communities approach each other creates a relationship that can have a lasting impact on personnel in the field. Staff and collaborators must show extreme care and sensitivity when recording or photographing, practices considered taboo or stigmatized populations, depending on the cultural context from which the image or quote is taken.

AIFO uses communication and images for mainly cultural and scientific reasons, and more generally for journalistic reasons, however, it is in any case in compliance with the legislation of the sector, in particular the law on copyright (633/1941) and the privacy law of the European Union (679/2016).

### **12.2 Quotes, Photos and video consent**

AIFO allows partners, donors and visitors to acquire quotations, photos and videos for non-commercial purposes with the verbal and written consent of individuals or communities in line with the photo and video policy.

### **12.3 Practical guide for image acquisition**

- When possible, establish a relationship before you start taking pictures.
- When approaching photo / video subjects in the field, briefly present yourself, be polite and explain the purpose of your visit or why you want to take pictures.
- In clinical settings, talk to the clinical director before starting to photograph healthcare professionals or patients.

### **12.4 Written consent**

Obtaining written consent is not practical in all circumstances. Written documents may have little or no meaning for people who speak a different language, people with low literacy and people living in cultures where photography or publications are not common. However, in situations where written consent is best practice, consider these suggestions:

- Photographers must respect their photographic subjects, preserve human dignity and consider the possibility that their photographic subjects may have negative consequences if photos are taken and used.
- Avoid using images of identifiable clients in clinics. When photographing a counseling session, it is recommended to position yourself so that you can see the back of the patient's head.
- Avoid showing photos of patients that can have a negative impact on a person or society.
- Use a model in a clinical setting, rather than a real patient, having obtained his agreement.
- To avoid possible misunderstandings on the part of the reader, include a disclaimer for printed or electronic material.

### **12.5 Complaint procedure**

In case the above mentioned principles are not applied, the complainant (an employee of AIFO or associated organizations) should:

- He must take note of the circumstances, the cases and any useful details
- Talk to the Director or a member of the Board of Directors.
- Report the complaint to the Internal Control Committee.

### **12.6. Complaint history and action of the Internal Control Committee**

- The complaint, depending on the case, is reported to the Internal Control Committee for investigation.
- If a formal investigation is opened, the final report of the Internal Control Committee is completed and submitted to AIFO Director within 120 days from the opening of the formal investigation. Meetings and virtual interviews are allowed.

### **12.7 Implementation of this policy**

AIFO will ensure that this policy is widely disseminated to all those concerned. All new employees will read and understand this policy as part of their introduction into the organization.

### **12.8 Policy review**

AIFO recognizes the importance of monitoring this policy and the way it is used, including the number of cases, the way they have been treated and the recommendations made. The association will evaluate the effectiveness of this policy and make the necessary changes.

The general principles of AIFO will be in compliance with the provisions of the different financing bodies and in particular reference will be made to the rules of the European Union and the Italian legislation in their updates.





## **Section 13. Policy on the acquisition of goods and services**

## **Section 13. Policy on the acquisition of goods and services**

### **Index**

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  - 3.1. Origin and provenance
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## 1. Scope and references

This document describes AIFO's internal procedures for the purchase of goods and/or services (including lease contracts for land and buildings) and the awarding of contracts for the construction of works and infrastructure.

The counterparty will from time to time be a supplier, in the case of purchase of goods, a service provider, in the case of provision of services, a contractor in the case of works and construction. To avoid repetition within the document we will use the term "supplier" to indicate the three figures.

The procedures described here constitute a framework document and must be applied both in Italy and abroad, both within and outside the framework of programmes financed by institutional donors.

**In the event that the guidelines or the contract of specific providers of funds require more restrictive conditions than these procedures, reference will be made to these particular rules to apply conditions different from those described herein, and this will also apply to specific procedures for the purchase of goods and services.**

In the case of programmes co-financed by several providers of funds, reference shall be made to this procedure and any additional conditions laid down by the main provider of funds without prejudice to the application of stricter rules.

Failure to comply with this procedure by operators of AIFO programmes may result in the expenditure in question not being considered eligible (recognised as eligible) by the funder.

The main rules herein refer to European legislation (*PRAG - Procurement And Grants for European Union external actions - A Practical Guide - Version 2016.0*).

In case of contributions coming from *AICS - Italian Development Cooperation Agency* it will be compulsory, for the relevant project activities, to follow also the *management procedures approved by the Joint Committee* and the administrative rules contained in the specific call for proposals.

Finally, for purchases in projects abroad, local legislation on purchasing procedures is also respected.

## 2. General principles

When choosing the supplier to whom to apply for a bid for the purchase of goods or services or for the award of a construction works contract, the following general principles must be observed:

- a) respect the criterion of equality in the treatment of potential suppliers;
- b) choose the most economically advantageous offer, i.e. the best quality/price ratio;
- c) respect the criterion of transparency in the selection and award process;
- d) make sure there are no conflicts of interest;
- e) Proportion the type of procedure to the value of the purchase or supply.

### **3. Admission or exclusion of offers from potential suppliers**

#### *3.1. Origin and provenance*

Potential suppliers or lenders (persons or companies) may come from or be based in any country, provided that this is provided for in the financial regulations of the project sponsors and that national legislation is respected.

In European regulations, the origin must be from the countries of the European Union or third countries listed in the lists specifically provided for in the various financial instruments. This origin must be supported by a certificate of origin (except for express derogations).

However, it is suggested to look for offers first of all in the beneficiary country, for logistical, economic and, in any case, to try to favour the local economy.

The choice of suppliers from outside the beneficiary country or from the above mentioned suppliers (EU or the appropriate lists) must be motivated by clear economic, logistical and organisational advantages, carefully assessing all related costs (e.g. after-sales conditions, existence of maintenance and spare parts network, etc.).

In the case of programmes co-financed by several donor organisations, the origin/origin of the goods purchased must comply with the relevant rules laid down by the main donor of the programme, and in any case must comply with the most restrictive of the rules of the co-financing organisations.

Any exceptions to these rules must be requested in advance by written procedure from the funder, awaiting approval.

#### *3.2. Exclusion of suppliers*

Natural persons or companies are excluded from participation in tenders:

- a. are in a situation of bankruptcy, liquidation, composition with creditors or receivership, in accordance with their national law;
- b. have been convicted of any crime related to their professional ethics;
- c. professionally speaking, have made proven serious mistakes;
- d. have been convicted or are under investigation for fraud, corruption, participation in criminal organisations, sexual misconduct and abuse, exploitation of children, trafficking in people and modern slavery, or any other illegal or condemnable activity according to the rules applied by United Nations bodies;
- e. have suffered a criminal conviction for bribes paid to obtain Community funding or failure to comply with contractual obligations;
- f. have not paid social security contributions or taxes in accordance with the regulations in the country of origin or the country where the contract is to be performed;
- g. do not respect basic social rights or exploit child labour;
- h. which have been declared to be in serious breach of contract or service contracts.

The natural persons or the director of the supplier company must declare that they are not in any of the above situations, submitting, together with the offer, a self-certification or formal declaration, based on the models provided by the financing body, referring to the negotiations in progress. Furthermore, at the time the order is awarded, they must certify that no changes have occurred.

In any case, suppliers who are subject to a conflict of interest or who have provided false or insufficient declarations or information in the context of the award procedure will be excluded from the award of the purchase or contract.

**Contractual clause:** in this framework the above mentioned formal self- certification may be replaced by a contractual clause that guarantees the respect of AIFO's ethical standards such as: "The applicant guarantees to share AIFO's ethical codes, to implement the Policies for the prevention and sanction of sexual exploitation and abuse, not to use and not to encourage the use of child labour, to practice gender equality in working relationships, not to discriminate politically or for reasons of religion, disability, race and origin, ethics, nationality, language, social origin."

**Supplier Management:** As an alternative and within the framework described above, AIFO may draw up, in Italy as well as in the countries where it operates, a List of usual suppliers - as it is for the Table of Consultants - for the management and prequalification of the suppliers themselves, functional to an effective, correctly optimized and transparent supply chain, which, on the basis of an audit carried out by AIFO's Administrative Services, and authorized by the Management, guarantee the necessary elements of reliability, financial risk and moral correctness. AIFO privileges this procedure that allows a more complete and updated evaluation and verification of the historical relationship with the supplier.

### **Rules common to all invitations to tender or supply of goods or services**

The call for proposals will be in accordance with the provisions of the various funding bodies and, in particular, reference will be made to the relevant rules of the European Union. Moreover, suppliers of services or goods, consultants and associates, also on the basis of what requested by the funders, will have to sign a self-certification or formal declaration of compliance with AIFO ethical policies, including the prevention and sanctioning of sexual misconduct and child abuse. This Declaration shall be verified by AIFO by all legal means.

The time limits and deadlines set for the receipt of tenders must be sufficient to enable interested parties to prepare and submit their tenders and, where required, the relevant documents.

Tender notices will be published locally and/or internationally depending on their importance (see section 5).

All tenders declared as compliant shall be evaluated and classified by a specially appointed committee in accordance with rules applicable to the criteria previously announced.

The committee must be made up of an odd number of members with the necessary technical and administrative knowledge to decide on tenders. The committee, at its minimum level, will be composed of the project leader and

two members with technical and administrative knowledge.

The choice of supplier will be made taking into account the following minimum criteria: price, quality, delivery time and compliance with the requirements imposed by the lender.

#### **4. Types of purchasing procedures**

Definitions:

- **Open procedure:** competition in which everyone can participate. The notice of invitation to tender shall specify the technical characteristics and the conditions for participation and submission to which the tender must conform. The publication of the tender notice will be at local or international level as appropriate.
- **Restricted procedure:** after the publication of the notice (call for tenders), potential bidders express interest to participate, and AIFO invites in writing the candidates deemed suitable to submit their bid; competition within this "restricted" circle must be guaranteed.

- **Competitive negotiation procedure:** invite at least 3 potential bidders at the same time and in writing, without the publication of an official tender notice. Three is the minimum number of valid bids to choose from, so a higher number of suppliers should be consulted to ensure that at least three meet the selection criteria and to ensure real competition.
- **Negotiated procedure with a single supplier**
- **Framework contract.** If, in a given country, it is expected that a certain type of goods or services will have to be purchased at a later date, even if destined for different programmes, it is convenient to stipulate a contract with the predetermination of the price and the conditions of supply (quantity, delivery time). Among the essential conditions is the duration of the agreement, which must not exceed 24 months. In order to achieve the best price/quality/delivery time ratio, it is advisable to issue an invitation to tender.

## 5. Thresholds for the application of purchasing procedures

The purchase procedure to be applied varies depending on the type of purchase (supply of goods, services or works) and on the total amount of the purchase.

In general, the total value of a supply may not be arbitrarily divided up for the sole purpose of falling within a lower threshold and simplifying purchasing procedures.

If for technical reasons a contract is divided into lots, the total of the lots must be taken into account to determine the purchase procedure.

### *6.1 Provision of services or facilities*

These are essentially studies and programmes (feasibility, economic, market, technical, evaluation, etc.) and technical assistance activities requiring the use of specialists and related resources.

6.1.1 For values of EUR 500 or less, this can be done without the need for a prior offer. The invoice alone is sufficient.

6.1.2 For values higher than EUR 500 and equal to or lower than EUR 2,500 it is possible to proceed on the basis of a single offer or with a framework contract;

6.1.3 For values higher than €2,500 and equal or lower than €300,000 the competitive negotiated procedure or framework contract must be used;

- 6.1.4 For values equal to or greater than 300,000 euros, a restricted international tender must be carried out, with the relative publication of an official notice (internet, newspapers of national and international relevance), using the restricted procedure.

## *6.2 Purchase of goods and equipment*

The supply of goods and equipment may also include the performance of ancillary work (e.g. installation and maintenance).

- 6.2.1 For values of EUR 500 or less, this can be done without the need for a prior offer. The invoice alone is sufficient.
- 6.2.2 For values higher than EUR 500 and equal to or lower than EUR 2,500 it is possible to proceed on the basis of a single offer or with a framework contract;
- 6.2.3 For values greater than 2,500 euro and equal to or less than 100,000 euros must be proceeded with the competitive negotiated procedure;
- 6.2.4 For values greater than 100,000 euros and less than or equal to EUR 300,000 must be proceeded by applying the open tender procedure limited to the local market in which you operate;
- 6.2.5 For values over 300,000 euros, the open procedure with international tender (published on the internet, national and international newspapers) must be applied.

In general - and for ECHO projects in particular - for the purchase of pharmaceuticals, medical devices and food aid, specific quality standards must be met, so the application and evaluation dossiers offered must be prepared taking these requirements into account.

## *6.3 Contracts for construction and infrastructure works*

It is essentially construction or civil engineering work, including both design and construction.

- 6.3.1 For values of EUR 500 or less, this can be done without the need for a prior offer. The invoice alone is sufficient.
- 6.3.2 For values higher than EUR 500 and equal to or lower than EUR 2,500 it is possible to proceed on the basis of a single offer or with a framework contract;



- 6.3.3 For values greater than 2,500 euro and equal to or less than EUR 300,000 must be proceeded with the competitive negotiated procedure;
- 6.3.4 For values higher than 300,000 euro and less than or equal to 5,000,000 must be carried out by applying the open tender procedure limited to the local market in which it operates;
- 6.3.5 For values over 5,000,000 euros, the open or restricted procedure with international tender (published on the internet, national and international newspapers) must be applied.

## **6. Cases where the negotiated procedure with a single supplier can be used**

In addition to the cases indicated above, the negotiated procedure may be used on the basis of a single offer in the following cases:

- in a situation of urgency or first emergency, in which, for documented reasons not attributable to AIFO, the procedures indicated above cannot be applied; formally declared crisis situations are part of these emergency situations, if contractually provided for;
- when a service or contract can only be awarded to a certain supplier for technical reasons or for rights of exclusivity or for possession of necessary patents or licences, always certifying the conditions given;
- for deliveries of goods and equipment complementary to other existing ones, and which must remain homogeneous and technologically compatible;
- where an invitation to tender has proved unsuccessful, i.e. has not produced an offer compatible with the conditions set out above, negotiations may proceed with one of the candidates after cancelling the invitation to tender, provided that the initial conditions are not substantially altered;
- where services or benefits are entrusted to public bodies or non-profit-making bodies, as part of institutional or social actions; (not applicable for ECHO projects)
- for property or building leases, if a market survey has been carried out and the value certified;

## 7. Authorizations

### 8.1 Purchases on site

- a. within the framework of **cooperation programmes in developing countries, financed by institutional donors**, are authorised by the project manager, whose reference is the approved expenditure budget, which he or she must strictly adhere to;
- b. **outside of programmes financed by institutional donors** are authorised by the Country Coordinator in accordance with its spending programme or, where it does not exist, by the EP Service.

In the operational planning of the project carried out in the initial phase - and updated for each year of activity - a purchase planning document and related procedures must be produced that also identifies any risks associated with the asset or work purchased and any related insurance coverage.

### 8.2 Purchases in Italy

- a. relating to programmes abroad funded, are authorised by the Service Manager in agreement with the Project Manager on site and under the supervision of the Director;
- b. relating to programmes in Italy funded in the field of education and communication are requested by the competent Service Manager of  
in agreement with the project manager in Italy and  
the authorization of the Director;
- c. relating to on-site management are authorised by the Director

## 8. Payment instruments

Payments should be made, where possible, by traceable means (bank transfer or cheque). Cash payments are allowed, except for exceptions (authorized by AIFO from time to time), only for amounts less than 500 euro.

As a rule, each project must have a bank account and a dedicated cash register. No exchange of funds between bank accounts of different projects, nor payments with funds other than those dedicated to the project, are allowed unless expressly authorized by the headquarters.

## **9. Document storage and archiving**

All the documentation related to the bids and tenders carried out under AIFO programmes (in particular: tender notices and regulations, bids received, minutes of the evaluation committee meetings, contracts with suppliers) must be scrupulously kept within the accounting and fiscal documentation of the programme.

They document compliance with the procedures and may be monitored by representatives of the donors and the financial and judicial authorities both in the beneficiary countries and in Europe.

The documentation must comply with the models attached in these procedures, and must be archived in such a way as to make each phase of the purchase process easily traceable (convocation, bids, analysis of bids, award minutes, communications, purchase orders, invoices and payments).

The documentation must be kept for ten years after approval of the final project report.



## **Section 14. Quality policy of the Association's work programme**

1. Purpose
2. Approach
3. Quality requirements

## **Section 14. Quality Policy of the Association's Work Programme Section**

### **14.1 Purpose**

The aim of the quality policy of AIFO's work program is to fulfil the organization's mission in the most effective and efficient way and to maintain the high quality through regular monitoring and evaluation methods. To this end, AIFO is committed to implement the best quality and the right quantity of activities according to the commitments contained in the proposals and agreements.

The quality policy of the work programme provides the basis for a coherent approach to programme quality management within the organisation. It does this by ensuring that all team members work together on the basis of a shared understanding of what programme quality means, why it is important and how it can be achieved. This principle can be used to standardize and spread the decision-making process at all levels and functions within AIFO and its partners.

The quality of the work program is a priority for all the work done by AIFO and by all the partners, and it is fundamental for all the strategies, functions, initiatives, policies, procedures, systems and other related organizational activities within AIFO.

For AIFO the quality of the work programme means that all our work makes the maximum possible contribution to the achievement of, for example, zero leprosy and to inclusive and sustainable development. The quality of the work program results from the processes that staff and partners use to manage every aspect of the work program. These include processes, determine how we work and what we do.

### **Section 14.2 Approach**

Our approach

1. Inclusive development: AIFO and partners' activities must always focus on the inclusive development of the community, including people with disabilities and people affected by leprosy or otherwise in vulnerable conditions.
2. Participatory approach: AIFO project planning and implementation must always use the bottom-up participatory approach that actively involves more stakeholders throughout the decision-making process.
3. Result orientation: AIFO project planning and implementation always ensure the result and use standard project planning tools such as project cycle management tool, logical structure analysis or results-based management approach in project planning.
4. Value for money: AIFO's activities should get a good value for money in everything they do. This means making the maximum contribution to the achievement of, for example, zero leprosy and to inclusive and sustainable development.

5. Responsibility and commitment: AIFO management team must periodically measure the various aspects of the project and determine if the actual and reported indicators are in line with those planned.
6. Continuous improvement: AIFO constantly strives to improve the work of the program, including what we do and how we do it:
  - a. interacts effectively with local communities, government officials and other stakeholders
  - b. develops and implements effective partnerships with multiple stakeholders, including donors,
  - c. addresses exclusion and promotes gender equality and children's rights,
  - d. promotes strategies to avoid sexual misconduct in the workplace and in all projects.
  - e. builds long-term capacity and authorizes sustainable solutions
  - f. makes the best use of all available resources,
  - g. is based on examples of good practice inside and outside,
  - h. responds to changes in the context and remains relevant.

### **14.3 Quality requirements for the work programme**

The following high-level requirements are mandatory for AIFO projects and for all partners to ensure that staff and partners achieve an adequate level of quality of the programme and accountability to all major stakeholders.

Strategic Requirement:

- AIFO will develop, implement projects in line with AIFO's vision, mission and strategic plans.
- All AIFO partners' projects develop the implementation and revision of strategic plans in line with this programme quality policy.
- All project activities are aligned with various policies, in particular child protection policy, prevention of sexual misconduct policy and financial policy.

Operational Requirement:

- All the work of AIFO projects will contribute to the achievement of the relevant strategic objectives. All projects are designed, implemented and reviewed following the project cycle management, the logical framework of the program, the theory of change, and the results-based management tools.
- All stakeholders are informed of the intentions and activities of the project and play a substantial role in making all major decisions regarding the design, implementation, monitoring, improvement and evaluation of each project.
- The staff responsible for project management and support understand the priorities and requirements of the donors concerned who finance AIFO.
- All staff are actively encouraged to commit to the quality of the programme and to maintain an adequate understanding of it.

policy and the contribution its role makes to its implementation and are recruited, supported and managed accordingly.

The general principles of AIFO will be in compliance with the provisions of the different financing bodies and in particular reference will be made to the rules of the European Union and the Italian legislation also in their updates.



## **Section 15. Project monitoring and evaluation policy**

1. Objective
2. Purpose
3. Project planning



## **Section 15. Project monitoring and evaluation policy**

### **15.1. Objective**

The purpose of AIFO's project monitoring and evaluation policy is to fulfill the organization's mission in the most effective and efficient way and to maintain high quality through regular monitoring methods and evaluation. To this end AIFO is committed to work for the best quality and the right amount of activities on the basis of the commitments contained in the proposal and in the agreements.

The objective of the organisation's monitoring and evaluation activities is twofold:

1. Ensuring that AIFO is fully responsible for the achievement of the objectives set for all programs and project activities;
2. Ensuring that AIFO and its partners learn useful lessons from the implementation of projects or programmes, and use such lessons to improve or refine programme management on an ongoing basis.

**Monitoring:** Monitoring is an ongoing assessment that aims to provide all stakeholders with timely and detailed information on the progress or delay of ongoing monitored activities.

**Evaluation:** An evaluation is a systematic and objective examination of the relevance, effectiveness, efficiency and impact of activities in the light of specific objectives.

### **15.2 Purpose:**

The following list highlights the most common reasons for undertaking monitoring and evaluation operations:

- Responsibility to the donor,
- Responsibility towards beneficiaries,
- Control and supervision of staff and volunteers,
- Learn from our work,
- Improve our performance,
- Management of projects or programmes,
- Provide supporting evidence,
- Public relations and fundraising,
- Allocation of resources,
- Measure the impact,

### **Three universal evaluation questions**

After deciding to develop a monitoring system or to carry out an evaluation, there are three universal evaluation questions that need to be answered for interested parties.

- The first: "we are doing what we said we would do", it is necessary to receive a response for the day-to-day intervention managers to show that they are completing the agreed work (internal validity).
- The second: 'we are making a difference' is necessary to respond to all stakeholders, but it is particularly relevant for donors to

- ensure that the money has been spent effectively (impact assessment).
- Finally, the third question: "these are the right things to do" provides the information needed project managers to ensure that the organisation remains relevant and is doing the right thing strategically (strategic relevance and learning).

### **15.3. Project planning systems:**

AIFO project planning and implementation always ensure the result and use standard project planning tools such as project cycle management tool, logical structure analysis or results-based management approach in project planning. The project proposal will be discussed with the whole project manager team and the project implementation staff to clarify objectives, activities and what we expect to achieve.

#### **Monitoring:**

All AIFO projects will ensure monthly monitoring and reporting against the monthly action plan. All individuals' reports will be collectively analyzed and combined with input, process, output and results indicators in the project proposal. Case studies and quantitative data with narrative reports will be considered as an important tool for monthly monitoring.

#### **Evaluation:**

All AIFO projects will propose the internal mid-term evaluation and the external final evaluation which is subject to the availability of funds. The quantitative, qualitative and emancipatory approach for the mid-term and final evaluation will be considered. The final evaluation report tells the Amici and the donor how we achieved our result with respect to the proposal. It also indicates good practices, reliability, challenges and strategies to overcome them.

Project evaluations will always ensure multiple stakeholder analysis, including project management staff, project implementation staff, beneficiaries, government officials. It will be compared with the indicators of the proposed project proposal.

The general principles of AIFO will be in compliance with the provisions of the different financing bodies and in particular reference will be made to the rules of the European Union and the Italian legislation, also in their updates.



## **Section 16. Policies for the use of technological facilities and privacy protection.**

1. Purpose
2. Politics
3. Acceptable and unacceptable uses
4. Privacy and security
5. Other limitations
6. Disrespect
7. Supervision
8. Data Protection and Back-up
9. Policy review

## **Section 16. Policies for the use of technological facilities and privacy protection.**

This policy concerns authorized users who access information technology (IT) resources under AIFO's control, including but not limited to: employees, volunteers, collaborators, contractors, suppliers and authorized guests; and other authorized users.

### **16.1. Purpose**

The purpose of this policy is to outline the Council's expectations of Administration on the acceptable use of IT resources by authorised users and to establish the parameters for the use of IT resources.

### **16.2. Politics**

IT resources are essential tools to achieve AIFO's mission to disseminate and extend knowledge, promote the free exchange of ideas and provide effective support for teaching, research and public service functions. It is the policy of the Board of Directors to ensure that the access and use of IT resources is a privileged tool available to specialized resources with the aim of facilitating the success of AIFO's activities.

AIFO IT resources include all electronic equipment, facilities, technologies and data used for information processing, transfer, storage, display, printing and communications.

Also including services owned, rented, managed, provided or otherwise related to AIFO resources, such as cloud computing or any other related/hosted service provided.

### **16.3. Proper and incorrect use of information technology resources**

The acceptable use of AIFO IT resources includes any purpose related to the direct and indirect support of the system life activities aimed at the full achievement of AIFO's mission objectives.

Authorized users shall not engage in misuse of AIFO system IT resources, which includes but is not limited to the following:

1. Unauthorized sharing or transfer of credentials, data, passwords that could allow unauthorized users to access the IT resources of AIFO system, except for what required by the administration;
2. Violation of national laws; institutional policies, rules or guidelines; or licensing agreements or contracts;
3. Misconduct, threats or defamation against third parties; creation of a hostile environment; stalking; and/or illegal discrimination;

4. Dissemination of unauthorized e-mail messages (e.g. mass mailing, spam, e-mail chain letters);
5. Intentional damage, interruption or exposure of IT resources or data to unauthorized access or damage.

In addition to the above examples, the incorrect use of AIFO IT resources for employees, volunteers, collaborators, contractors and authorized suppliers also includes:

6. Storage, display, intentional or solicited transmission or receipt of material that is or may reasonably be considered obscene, sexually explicit or pornographic, unless such access relates to a specific and authorized need for investigation or research;
7. External employment, commercial activities or other forms of private financial gain;
8. Campaign for public offices or solicit political contributions;
9. Political lobbying;
10. Betting;
11. Use for private or personal purposes that interferes with work or work performance or that interferes with the activities of other employees, or other authorized users.

Authorized users cannot use AIFO IT resources or use AIFO trademarks or logo without authorization.

The user authorization does not imply in itself also the authorization to speak on behalf of AIFO.

AIFO is not responsible for the content of documents, exchanges or messages, including links to other information on the Internet that reflect only the personal ideas, comments and opinions of individual members of the community, even when this content is published or otherwise distributed to the public.

#### **16.4. Privacy and security**

AIFO takes reasonable measures to protect the privacy of its IT resources and the accounts assigned to authorized users.

However, AIFO cannot in *itself* guarantee absolute security and privacy. Any use of IT resources can be monitored, recorded and reviewed by personnel appointed by AIFO. In general, the contents of users' accounts will be treated as private and not examined or disclosed, except:

- if required for system maintenance or business needs, including security measures;
- if there is reason to believe that an individual is in violation of the law or the policy of the Association, on any report from the relevant authority, the Board of Directors, the Internal Control Committee;
- to meet the requirements of the law; regulations; or policies, rules or institutional guidelines;
- as permitted by applicable law or policy.

AIFO has the right to take appropriate security measures, to investigate as necessary and to take the necessary measures to protect IT resources.

AIFO may also have a duty to provide information relevant to ongoing law enforcement investigations.

AIFO will protect both authorized users and their privacy as well as AIFO's interests. Authorized users must not violate the privacy of other users. The technical ability to access unauthorized resources or accounts of others does not imply the authorization to do so, and can be evaluated as a violation of AIFO policy.

#### **16.5. Other restrictions on the use of information technology resources**

In addition to the general principles set forth in this policy, the use of IT resources may be affected by other laws and policies, including: copyright and privacy laws; cybercrimes and political activities; ethical standards of conduct; dismissal for cause; and disciplinary rules and processes relating to misconduct.

For confidentiality and respect of data security and privacy the Rules of access and use of the AIFO computer network, the related archives, the services Internet is decided by the Director, depending on the performance of the work services, consequently access to the network and to the computer archives must always, only and exclusively through the methods established by the Network Administrators.

#### **16.6. Non-compliance with information and communication technology resource policies**

Failure to comply with the provisions of this AIFO policy may result in the suspension or loss of access to AIFO IT resources; appropriate disciplinary action according to existing and contractually applicable procedures. In order to preserve and protect the integrity of AIFO IT resources, there may be circumstances in which it is necessary to suspend or deny access to the resources.

On this point AIFO policy is more specifically articulated in the areas of external and internal communication.

### **16.6.1 Communication to the outside world.**

AIFO's activities are based on an annual communication plan that has as interlocutors an expert Agency in communication and Journalists in charge of the management of the various media, **from the magazine to the web tools**. The respect of these areas, these tasks and these responsibilities is due by all AIFO's staff and collaborators.

AIFO President is the Director of the magazine -house organ of AIFO-, and the Director is the figure who reports to the Board of Directors for the various communication and information projects that are yearly reported in the Social Report.

AIFO works for a responsible, understandable and shared communication, a tool to consolidate and strengthen its mission and its positioning in the company, but also its credibility towards partners, partners and donors.

AIFO applies an honest, truthful and correct communication policy in order to make better known the activities we do and the current role of international development cooperation. To tell well the mission of AIFO, cooperation and volunteering means to identify a unique and homogeneous common path that allows us to face the big crises in progress, putting at the center the credibility of civil society associations and asking for support for the campaigns and causes promoted.

AIFO shares the Code of Self-Discipline for Advertising (10.3.2020 of the Advertising Self-Discipline Institute) and the Ethical Charter of Italian Associations members of the Association of Italian organizations for international cooperation and solidarity (AOI).

AIFO is committed to ensure, in the respect of privacy, adequate and truthful information about donors, donors, supporters, partners, and the projects it manages.

To guarantee in the communication activity the objective knowledge of the reality of the countries subject to intervention, without discrimination of gender, race, religion, and without using in a deformed way the information and images specifically collected.

To provide truthful information on the purpose and aims of their projects, ensuring first and foremost respect for the dignity of each person.

### **16.6.2 Internal communication and use of communication tools.**

AIFO is committed to maintaining adequate communication with members, supporters, collaborators and volunteers, communicating strategies, programs and every useful information for effective participation and development of associative life.

To this end, it guarantees an internal communication system, constant and efficient, regarding all those activities that favour a valid functioning of the NGo and aimed at consolidating the link, already existing within it of the organization that represents its wealth of resources, ideals and values.

The mailbox assigned to the user is a work tool and must be used exclusively to make the work performance and the performance of the tasks assigned, the user is responsible for this proper use and must take strict care that the contents and recipients of the outgoing messages are strictly related to the work activity and that the messages are inherent to their skills, always requesting from the hierarchical superior the authorization to send sensitive or confidential documentation. It is forbidden to forward messages outside the Association that are not related to the user's skills and not related to his/her work or institutional activity.

Extended distribution of e-mail messages in addition to the competent recipient of the work communication must be carried out exclusively for reasons inherent to the service, and with the authorisation of the competent Service Manager.

Emails with confidential contents, related to the responsibilities of AIFO's executive bodies must always have the Management among the recipients for knowledge. Any other communication sent or received that has relevant contents or contains contractual or pre-contractual commitments of AIFO, or contains documents to be considered confidential must be communicated or authorized by the Service Manager or by the hierarchical superior of the user.

It is forbidden to duplicate documents containing sensitive or confidential data on removable media or on network systems not directly managed by AIFO.

The individual use of Facebook, Twitter, LinkedIn, blogs and forums, including professional ones, (and other sites or social media) for purposes unrelated to work is prohibited during working hours.

The Privacy Guarantor's guidelines on e-mail and internet privacy must be respected (*Official Gazette no. 58 of 10 March 2007*).

The person in charge of organizational communication is the Director who has the duty to protect AIFO's image and at the same time to guarantee the efficiency and usefulness of the network.



### **16.7. Supervision, roles and responsibilities**

This policy applies at system level. In order to fulfill its responsibilities regarding the use of IT resources, AIFO includes this Policy in its Operating Policies Manual, distributed and present on its website.

It is the responsibility of authorized users to comply with this policy.

The Director shall be responsible for the implementation of this policy and the operation of the institution's IT resources consistent with the above provisions.

### **16.8. Data protection and back-up**

AIFO Sede has a centralized and regular downloading system of data on its activities and projects. The local coordination offices in the countries where AIFO has projects have a local downloading system and regular updating of data by sending them to the Headquarter. Both Headquarter and Local Offices also use Office 365 to share documents in Cloud mode. In these activities the privacy, confidentiality and security of data and documentation must always be respected, reporting immediately any anomalies found by the Superior Manager.

### **16.9. Policy review**

AIFO recognizes the importance of monitoring this policy and the way it is used, including the number of cases, the way they have been treated and the recommendations made. The association will evaluate the effectiveness of this policy and make the necessary changes.

The general principles of AIFO will be in compliance with the provisions of the different financing bodies and in particular reference will be made to the rules of the European Union and the Italian legislation also in their updates.



## **Section 17. Financial and administrative policy**

1. Organisation, administration and accounting regulations

## **Section 17. Financial and administrative policy**

### **17.1. Organisation, administration and accounting regulations**

Responsibilities for the implementation of the management policy, administrative and accountants were defined by the Board of Directors on 12 September 2009 as follows:

#### **AIFO - ORGANISATION, ADMINISTRATION AND ACCOUNTING REGULATIONS**

Art.1 - The operative structure supporting the Association's activities and in charge of its management, as per art.5, paragraph 2, and art.8, paragraph 2, letter g, of the Statute, is constituted by the Management, with the attributions and articulations specified in the following articles, and by the central technical structure of the Association.

By central technostructure is meant the complex organizational structure composed of employees and consultants who respond to the skills and operational needs of the association.

Art.2 - The Management ensures the operational management of the Association and of the operational structure, consistently with the planning deliberated by the statutory bodies and the consequent strategic orientations, through an activity organized by projects and a system of clear attribution of responsibilities to the structures and functional organizational integration.

Management is responsible for drafting and updating "internal procedures".

Art.3 - The Management avails itself of a "Management Secretariat" and four Services:

- Secretariat and General Services, Information Systems
- Administration and Accounting General, Management Control and Reporting,
- Educational and Training Activities, Civil Service, Communication and Fundraising,
- Foreign projects, national and international scientific activities.

If necessary, the single services can be disaggregated or aggregated for offices that correspond to more specific areas of activity or different functional levels.

Art.4 - The Management reports to the President and to the Board of Directors, according to the powers attributed by the Statute to these bodies of the Association. Art.5 - The Service Managers mentioned in the previous articles are responsible, each one for his or her part, for the achievement of the objectives set and for the use of the resources assigned to the realization of the planning deliberated by the statutory bodies, on the basis of the guidelines formulated by the Board itself and by the President, who supervises the overall activity of the Association's organizational structures.

Art.6 - The Board of Directors, on the proposal of the Management, by its own resolution defines the powers to sign deeds that commit the Association, to be assigned to those responsible for the orderly performance of the tasks assigned to them, also defining their modalities and limits.

Art.7 - The employment relationship of employees is governed by collective bargaining for the trade sector in force.

Art.8-In order to keep the company's books, to manage assets and accounting, the Association complies with the regulations in force for non-commercial bodies.

The Association's balance sheet must be subject to verification by a qualified independent certification company

Art.9 - The Board of Directors establishes adequate forms of communication towards members, the social context and institutions in order to ensure transparency in the management of the Association and its activities.



## **Section 18. Policy on internal and external audits**

### **18.1 Audit by the Board of Statutory Auditors**

According to the provisions of art. 10 of the Statute of the Association, AIFO's National Assembly elects the Statutory Board of Auditors, which can be a collegial or monocratic body. If collegial, it must be composed of three effective members and two alternates, that remain in office for three years. The Board of Auditors may have different functions if provided by Italian laws that will evolve according to the Italian Law on Third Sector Associations (ATS).

Auditors must be registered in the Ministry's of Economy and Finance Register of Auditors and must be chosen in compliance with the provisions of Article 2399 of the Italian Civil Code, which also regulates their forfeiture.

The Statutory Board of Auditors normally meets quarterly to check compliance with the law and the articles of the association and to verify compliance with the principles of correct administration in accordance with the provisions of Article 2403 of the Italian Civil Code and also with reference to the provisions of Legislative Decree no. 231 of 2001. This Body is also called upon to certify that the Association's financial statements have been prepared in accordance with the guidelines set out in a special decree issued by the Minister of Justice, as provided for in art. 14 of the Third Sector Code (Legislative Decree 117/2017).

### **18.2 External audit of budget certification**

In addition to the appointment of the Statutory Board of Auditors, AIFO avails itself annually of an independent auditing firm for the certification of the financial statements and the control of the compliance with the criteria and principles described in the explanatory notes. The audit is carried out in compliance with international auditing standards (ISA Italia) which also determines their responsibilities.

### **18.3 Project audits**

The Donor as specified in the Contract or in the project reporting guidelines, may request that an annual audit be carried out or at the conclusion of the project by an external auditor who certifies its compliance and whose report must be attached to the financial report.

In addition, the Contracts/Conventions stipulated with the donor provide that the entity may at any time in the following years (usually 5 years from the payment of the last tranche) carry out a verification of the operations and/or administrative aspects related to the funded project.

In case AIFO is an "co-applicant" in a project, it will be required to check and keep also the documents of the other partners and to show them to the auditor who will be responsible for certifying the compliance. The Association is therefore also responsible for the actions taken, within the limits of the project, by its partners, and then to take recourse against them in accordance with the provisions of the ATS/Conventions/Memorandum of Understanding.

**MINUTES OF THE BOARD OF STATUTORY PROCESS 483 of 19 October 2019**

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**DEL. 147/19 - CA/DIR**

**(Organisation policies and procedures – - AIFO Manual of Operational Policies and Ethical Code of Conduct )**

With the widening of AIFO's project activities, and therefore of the circle of co-funders and stakeholders, it is more and more necessary to bring together in a single document the general guidelines, principles and behavioural and operational lines that our Association is committed to respect in its work programs, projects and reports, in the wider context of what are the main international documents shared by NGOs and donors.

Many of these policies have been approved, implemented and followed by AIFO for many years and are contained in individual internal documents.

It is necessary and appropriate today to have them in a single and harmonic document, and to this end the Board of Directors instructs the Management to draw up, in collaboration with the structure and consultants, a draft document organized on the basis of the following General Index, as well as to verify its conformity with the requests of AIFO donors, subsequently submitting it to the approval of the Board itself.

	Index	
Section number	Policy name / manual	Pages
1	Policy of the Association	
2	Human resources policy	
3	Complaints and complaints policy	
4	Health and safety policy	
5	Gender policy	
6	Sexual misconduct policy	
7	Child protection policy	
8	Modern slavery policy	
9	Conflict of interest policy	
10	Anti-bribery and corruption policy and alert	
11	Environmental and sustainability policy	
12	Photo and video consent policy	
13	Policy on the acquisition of goods and services	
14	Quality policy of the programme	
15	Monitoring and evaluation policy	
16	Policies for the use of technological structures	
17	Financial and administrative policy	
18	Policy on internal and external audits	

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