

# Carbon Neutral Cities Alliance (CNCA) Safeguarding Plan

## I. Introduction to the safeguarding policy

CNCA understands ‘safeguarding’ to mean taking all reasonable steps to **prevent** harm that arises from coming into contact with our staff or programs delivered directly or through partners — including sexual exploitation and abuse. The policy includes steps to **protect** vulnerable people, especially children and at-risk adults, from harm, and steps to **respond** appropriately when harm does occur.

### Scope

This policy applies to all CNCA staff, fellows, and interns, unless explicitly exempted. The stakeholders listed above are responsible for safeguarding from abuse, exploitation or maltreatment of any kind the vulnerable subjects that they come into contact with as part of any CNCA operations, including online or in-person interactions.

The vulnerable subjects with whom CNCA or CNCA supported projects may engage with include youth, elderly people, immigrants and refugees, Indigenous Peoples, people who are differently abled, people with low incomes, people of color, people who identify as LGBTQI+ or gender non-conforming, and non-native language speakers, or other marginalized people.

## II. Purpose and aim of the safeguarding policy

The aim of this safeguarding policy is to ensure that people CNCA interacts with are protected from harm through their contact with CNCA. CNCA undertakes a coordinated approach to protect children and adults at risk, and it prioritizes safety and welfare in its dealings with all stakeholders.

The safeguarding policy is built on the principles of non-discrimination, equality, equity, dignity, integrity, confidentiality, the responsibility to raise concerns, and protection from reprisals or repercussions. Bullying, discrimination, harassment, exploitation and abuse are not tolerated and procedures are in place to ensure that concerns are raised immediately. CNCA aims to develop a safeguarding culture as an iterative process, requiring continuous action and vigilance.

Harassment and bullying in the workplace, fraud, corruption or malpractice, grievance, whistleblowing, malpractice and recruitment policies are not within the

scope of this safeguarding policy. As a fiscally sponsored project of the Urban Sustainability Directors Network (USDN), CNCA employees are also subject to policies and procedures prohibiting any form of unlawful employee harassment or discrimination. These policies and reporting and response procedures are detailed in the USDN Employee Handbook.

### **III. Legal and policy basis of the policy**

CNCA is committed to reporting any violations of local laws to the relevant authorities, ensuring that concerns are reported to the appropriate authorities, and a duty to follow up such reports to ensure action has been taken. The safeguarding policies and procedures are grounded in the legislation and policy framework of the United States of America, where this organization is registered and based in.

### **IV. Definitions**

We operate according to the following definitions:

- A “child” is defined as someone under the age of 18, irrespective of the age of adulthood in the country where they live; and
- An ‘at risk’ adult is a person over the age of 18 who, for any reason (for example their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages, indigenous status, or migration status), may be more likely to be adversely affected by a CNCA funded project, or may be unable to protect themselves from significant harm or exploitation.

Abuse includes but is not limited to the following types:

- Sexual abuse: this includes indecent exposure; sexual harassment; inappropriate looking or touching; sexual teasing or innuendo; sexual photography; being forced to watch pornography or sexual acts; being forced or pressured to take part in sexual acts; and rape.
- Physical abuse: this includes being hit, slapped, pushed or restrained; being denied food or water; not being helped to go to the bathroom when one needs to; and misuse of medicines
- Psychological abuse: this includes emotional abuse; threats to hurt or abandon; humiliating, blaming, controlling, intimidating or harassing a subject; verbal abuse; cyberbullying and isolation; and an unreasonable and unjustified withdrawal of services or support networks

- Domestic abuse: typically an incident or pattern of incidents of controlling, coercive or threatening behavior, violence or abuse by someone who is, or has been, an intimate partner or family member.
- Discriminatory abuse: this includes some forms of harassment, slurs or unfair treatment relating to one's age, disability, gender reassignment, gender identity, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or due to a person's pregnancy.

CNCA has a zero-tolerance approach towards harm, including abuse, exploitation and neglect of children and at-risk adults.

## **V. Responsibilities**

All staff, fellows, and interns have the following obligations:

1. Report any vulnerable person abuse and/or protection concerns immediately to the CNCA Executive Director. Concerns can be reported by directly contacting the CNCA Executive Director. If there are concerns regarding the CNCA Executive Director, these can be reported to the USDN Executive Director.
2. Undertake induction training on this policy which is relevant and appropriate to their position so that they can undertake their responsibilities effectively.
3. Cooperate fully and confidentially in any investigation of concerns or allegations of vulnerable persons' abuse.
4. Respond to a vulnerable person who may have been abused/exploited in accordance with their best interest and safety.
5. Identify, minimize, and attempt to avoid potential situations of risk for vulnerable people.

The CNCA Executive Director is the focal point person for safeguarding. Their responsibility includes:

1. Develop and approve the safeguarding policy and revise it periodically as needed (e.g. based on a risk assessment of a new line of programming, after any incidents etc);
2. Review the policy annually in November each year, approve any updates, and submit the revised policy when updated to the USDN Executive Director;
3. Conduct a risk assessment in general operations and for any new programming;
4. Train staff, interns, and fellows and;
5. Handle and report allegations, record incidents, report incidents to the USDN Executive Director and make sure everyone at CNCA learns from the incident.

## **VI. Code of Conduct**

When working with children and adults at risk through any CNCA activities or events, online or in person, it is essential that staff, interns, and fellows:

1. Uphold this code, and any safeguarding procedures, at all times.
2. Treat adults at risk and children fairly, without prejudice or discrimination and avoid favoritism—giving unfair preferential treatment to one person or group at the expense of another.
3. Challenge unacceptable behavior and report all allegations and suspicions of abuse regardless of the status of the adults involved.
4. Respect a child or an adult at risk's right to personal privacy, but never agree to keep any information relating to the harm of a child or an adult at risk confidential.
5. Ensure that all contact, interactions and communications, face to face and online, with children and adults at risk are appropriate and relevant to the work of CNCA
6. Use language which is appropriate and is not bullying, offensive, intimidating or discriminatory on the grounds of: age, disability, gender reassignment, gender identity, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or due to a person's pregnancy.
7. Maintain appropriate conduct and avoid threatening or potentially violent behavior that may lead to children or adults at risk feeling anxious or frightened by behavior during meetings or events in person or online.
8. Value and take the contributions of children and adults at risk seriously, actively involving them in project planning and implementation wherever possible.
9. When conducting any community meetings or other convenings carefully consider any physical contact with a child, woman, or an adult at risk. Ensure that physical contact is appropriate and not unnecessary or unjustified. They should be aware that physical contact with a child, woman, or an adult at risk may be misinterpreted, no matter how well intentioned.
10. Secure consent to use any images, photographs or videos, of children (from a parent or guardian) or adults at risk.

Prohibited conduct includes, but is not limited to, the following:

1. Developing relationships with vulnerable people which could in any way be deemed exploitative or abusive.
2. Acting in ways that may be abusive or may place a vulnerable person at risk of abuse.
3. Using language, making suggestions or offering advice to vulnerable people which is inappropriate, offensive or abusive;
4. Condoning, or participating in, behavior of vulnerable people which is illegal, unsafe, or abusive;
5. Acting in ways intended to shame, humiliate, belittle, or degrade children or at-risk adults, or otherwise perpetrating any form of emotional abuse;

6. Discriminating against a children or at-risk adult based on, but not limited to, their age, disability, gender reassignment, gender identity, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or due to a person's pregnancy;
7. Allowing concerns or allegations to go unreported.

To safeguard children, all CNCA staff and representatives must never:

8. Have sexual contact or sexual activity of any form with a child. This is prohibited regardless of the age of majority or age of consent in the jurisdiction in which the abuse occurred;
9. Send or solicit from a child sexually explicit or sexually suggestive written or electronic communication;
10. Behave physically towards a child in a manner which is sexually inappropriate or sexually provocative;

CNCA staff, fellows, and interns are also prohibited from aiding or facilitating another adult who is engaging in inappropriate behavior with a child or adult-at-risk including, but not limited to, the conduct listed above.

If a child is in danger or at imminent risk of harm, contact the appropriate child protection authorities in the country where the child is located.

If a staff member breaks this policy or fails to meet the standard of behavior that it requires, disciplinary action will be taken. This will include dismissal and/or referral to national authorities for criminal investigation and prosecution, should the law be broken in the country in which an offense is committed.

## **VII. Risk Assessment**

CNCA staff will conduct a risk assessment of CNCA activities, which will be updated annually. This assessment will identify the risks, likelihood of risks, potential severity of the impact of the risks on children and at-risk adults and actions that could help mitigate the risks. The risk assessment will be aligned with Do No Harm principles.

The risk assessment will be reviewed and updated annually and when a new type of activity or program is developed which is distinct from the activities included in the current risk assessment.

## **VIII. Reporting procedures and process**

Staff should acknowledge their individual responsibility to bring matters of concern as soon as possible to the attention of the CNCA Executive Director and/or USDN Executive Director if the concerns relate to the CNCA Executive Director.

If anyone has a significant concern or believes that there has been a safeguarding incident, they shall follow the following reporting procedure:

- Take emergency action if needed (contact police, medical, and/or social services)
- Record relevant information and key facts (date, times, incident/concern) in the incident reporting form (see Annex). In the form, they can choose to report anonymously.
  - As anonymously reported incidents are more difficult to verify and investigate, they carry less weight than incidents that are reported by named persons;
  - Misuse of the opportunity to anonymously report safeguarding incidents or concerns will be considered as a form of abuse and will be handled accordingly.
- Refer the incident/concern to the CNCA Executive Director.
- In the event that the incident relates to the CNCA Executive Director, then this should be taken immediately to the USDN Executive Director.
- If the CNCA Executive Director does not act on concerns raised, the initial concern and the inaction should then be reported to the USDN Executive Director
- Do NOT investigate the incident or concern yourself.

To report an incident or concern, the contact information the CNCA Executive Director and USDN Executive Director is listed below:

CNCA Executive Director: Simone Mangili

- Email: [simonemangili@carbonneutralcities.org](mailto:simonemangili@carbonneutralcities.org)
- Phone: +39 347-092-5436

USDN Executive Director: Deneine Christa Powell

- Email: [dcpowell@usdn.org](mailto:dcpowell@usdn.org)
- Phone: +1 (360) 961-5698

During the project implementation period, CNCA will report serious incidents, i.e., a crime under local law, such as incidents of sexual abuse, exploitation, domestic violence or child abuse, to the appropriate authorities.

## **IX. Response procedures**

After a concern or potential safeguarding incident has been reported, the following procedures shall be followed by appropriate CNCA staff and/or USDN Executive Director who are administering the investigation:

- Disciplinary action against the accused party may be taken as per USDN Policies and Procedures.
- If a member of staff is subject to a safeguarding allegation, they should be relieved of their duties while an investigation takes place. In compliance with labor law, they are entitled to full pay while the investigation is conducted and a verdict is reached.
- While an investigation takes place all those involved in the investigation should be supported, including the person whom the concern has been raised about.
- Disclosure of physical or sexual abuse in regards to a member of staff, volunteer, contractor, trustee should be reported to the police and/or relevant authorities.
- Disclosure of a suspicion of abuse may not always be reported to the police, but a risk assessment and appropriate action, potentially disciplinary action, will be undertaken, which may result in police involvement.

## **X. Risk Record Storage**

A reported incident will be stored in an encrypted table accessible only to the CNCA Executive Director and the USDN Executive Director. Each incident will be stored with an incident ID, date of reporting, description, reporter (optional), following actions, and investigation outcome.

## **XI. Monitoring and Review**

The CNCA Executive Director is the point person for safeguarding. Each year, the CNCA Executive Director will review the existing policy by November 5, in order to update the policy based on any incidents reported and identify opportunities to strengthen the policy and procedures.

When any new lines of work or programming not covered by the prior risk assessment are added, the CNCA Executive Director will update the risk assessment and the policy, if needed.

In December of each year, the CNCA Director will report to the USDN Executive Director any updates to the policy and follow up from any previously reported incidents.

All policy signees shall be given notice of any changes to the policy and/or procedures.

## **XII Complementary Policies**

Complementary policies are included in the USDN Employee Handbook ([link](#)), including policies and procedures related to:

- Equal Opportunity and Commitment to Diversity Equal Opportunity
- Americans with Disabilities Act (ADA) and Reasonable Accommodation
- Commitment to Diversity
- Harassment and Complaint Procedure
- Workplace Violence Prevention



## **Annex: Incident Report Form**

This form should be used to record safeguarding concerns relating to children or/and adults at risk. In an emergency please do not delay in informing the police or social services. All the information must be treated as confidential and reported to the designated safeguarding point person within one working day. The form should be completed at the time or immediately following disclosure, but after all necessary emergency actions have been taken.

- Name and contact information of the person making the complaint:
- Date:
- Name and contact information of the person making the disclosure (if different from the person making the complaint):
- Name(s) of persons present during the incident:
- Date and time of the incident
- Factual description of the cause for concern:
- Any steps taken to address the incident:

Please include additional relevant information that you believe to be helpful or important: