PARTENERIATE PENTRU FIECARE COPIL

PARTNERSHIPS FOR EVERY CHILD

Approved by Daniela Mămăligă,

Director



Policy on Prevention of Sexual Exploitation and Abuse (PSEA)

2026

1. Purpose

The purpose of this Policy is to declare an absolute zero-tolerance stance on sexual exploitation and abuse (SEA) across all levels of AO "Parteneriate pentru fiecare copil" (P4EC). This policy ensures that expected standards of conduct, operational roles, and reporting responsibilities are explicitly understood by all stakeholders to guarantee that beneficiaries are safe and protected from harm. P4EC is committed to robust prevention measures and providing a prompt, survivor-centered response to all forms of SEA allegations.

This policy applies to all employees, consultants, volunteers, partners, suppliers, sub-contractors, agents, and any other individuals or entities working with, for, or representing P4EC, or participating in programs implemented by P4EC, both domestically and internationally. It is applicable 24/7, 365 days a year, both during and outside of official working hours.

This policy aims to create and maintain a safe environment, free from SEA, by taking appropriate measures, internally and in the communities, we work with, through robust prevention and response work This policy is implemented alongside the P4EC Child Protection Policy, Code of Conduct, Non-Discrimination Policy, Anti-Trafficking Policy, Employee Handbook, and associated recruitment procedures.

2. Policy Statement

P4EC enforces a strict, "Zero-Tolerance" approach to Sexual Exploitation and Abuse. No representative acting on behalf of or associated with the organization shall engage in any form of sexual abuse or exploitation against beneficiaries or community members. All P4EC beneficiaries have an equal right to protection, regardless of age, gender, culture, ethnicity, religion, sexual orientation, or identity.

3. Definitions

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes rape, sexual assault, and any sexual activity with a child or minor.

Sexual exploitation: The abuse of a position of vulnerability, differential power, or trust for sexual purposes. This includes profiting monetarily, socially, or politically from the exploitation of another, and encompasses transactional sex or the solicitation thereof.

As per the present policy Sexual exploitation and abuse (SEA) is an actual or attempted assault against beneficiaries of the P4EC programmes or other third parties involved, both in country and overseas.

Sexual Exploitation and Abuse refers to all forms of inappropriate conduct of a sexual nature.
Examples of sexual exploitation and abuse include, but are not limited to:

- Sexual assault or abuse;
- Unwanted (without consent) touching of a sexual nature;
- Demanding sex in any context;
- Making sex a condition for aid or participation in a development program;
- Forcing someone to have sex;
- Forcing a person to engage in sex work or pornography;
- Any sexual activity with a child;
- Withholding due services or blackmailing for sex;
- Hiring sex workers.

Sexual abuse and exploitation also include demands for inappropriate photographs, filming, and exposure to pornography, etc.

Sexual Harassment: Any unwelcome physical, verbal, or non-verbal behaviour of a sexual nature that creates an intimidating, hostile, degrading, humiliating, or offensive environment, or harms a person's

dignity in the workplace or in connection with work (in accordance with the Labor Code of the Republic of Moldova). Sexual harassment may occur in the workplace or in connection with work, outside the workplace and outside working hours, including during official travel or social functions related to work. It may occur between persons of the same or different genders and individuals of any gender can be either the affected individuals or the alleged perpetrators. The perpetrator my be any colleague, including a supervisor, a peer or a subordinate. A perpetrator's status as a supervisor or a senior official may be treated as an aggravating circumstance

Protection from Sexual Exploitation and Abuse (PSEA): The collective responsibilities of P4EC personnel to actively prevent and respond to incidents of SEA committed against recipients of assistance or community members.

4. Core Principles (UN Secretary-General Standards)

Preventing sexual exploitation and abuse is a major responsibility of P4EC, and as such, it is mainstreamed throughout the organization and its operations, and is incorporated into all related policies and procedure.

P4EC strictly adopts the six core principles defining SEA as acts of gross misconduct, constituting immediate grounds for termination of employment or engagement:

1. Sexual exploitation and sexual abuse constitute acts of **serious misconduct** and are grounds for immediate administrative and disciplinary measures, including summary dismissal.
2. Sexual activity with children (individuals under the age of 18) is strictly prohibited, regardless of local laws or traditions or consent. Mistaken belief regarding the age of a child does not constitute a defense.
3. The exchange of money, employment, goods, assistance, or services for sex—including sexual favors or other forms of humiliating, degrading, or exploitative behavior—is **strictly prohibited.**
4. Because relationships between staff and beneficiaries are based on inherently unequal power dynamics, any sexual relationship between a P4EC representative and a program beneficiary is **strictly prohibited.**
5. Any representative who develops a concern, suspicion, or good-faith rumor regarding SEA committed by a colleague or partner must immediately report it through the organization's designated reporting channels.
6. Personnel at all levels are obligated to create and maintain an environment that actively prevents SEA and promotes the values of the organization's Code of Conduct.

5. Roles and responsibilities

P4EC takes a victim-centered approach to its prevention and protection measures against sexual exploitation and abuse. P4EC seeks to ensure that victims are provided with support, as needed, at the same time as reports are investigated.

We rely on the psychological and social support services provided by the authorities, NGOs, other stakeholders for direct assistance for victims of sexual exploitation and abuse.

In order to protect the most vulnerable populations, particularly vulnerable adults, and children, and ensure the integrity of P4EC activities, P4EC will uphold the following safeguarding and well-being measures:

1. Create a safe working culture, free of any exploitation, abuse, or harassment, for all those whom the organization serves and those working for and representing the organization.
2. Ensure that all concerns or allegations of sexual harassment, abuse or exploitation are responded to in a timely and appropriate manner and that multiple channels exist through which employees and other stakeholders can report concerns.
3. Ensure zero tolerance of sexual exploitation and abuse in the organization through robust prevention and response work, offering support to survivors and victims and holding those responsible to account.

4. Always adopt a survivor centered approach that respects the confidentiality and decision-making rights of survivors where possible and appropriate to do so.
5. Create a culture where all those whom the organization serves and who work for the organization feel empowered to insist on non-discriminatory and respectful behavior from each other, where poor behavior is not accepted, and where power is not abused.
6. Be transparent about safeguarding issues occurring within the organization.
7. All reported incidents of SEA will be handled impartially and independently by neutral parties who are not directly involved and have no conflict of interest in the case.
8. The organization will ensure that the reporting informant is not retaliated against following any reported incident.
9. The organization will commit to protecting the rights of persons to live in safety, free from abuse and neglect including in the workplace and the stakeholders and their families which they work with.

Responsible parties:

Organizational Oversight

1. **The Administrative Council:** Holds ultimate institutional accountability for the updating, oversight, and implementation of this policy.
2. **The P4EC Director:** Responsible for appointing the PSEA Focal Point, ensuring multiple safe reporting channels exist, providing transparent organizational information regarding reporting pathways, and ensuring personnel receive appropriate training.

Internal Focal Points

The HR & Development Manager acts as the primary **Child Protection Officer (CPO) and PSEA Focal Point**. Direct responsibilities include:

1. Securely registering all concerns, allegations, and good-faith rumors.
2. Ensuring the survivor's well-being is prioritized and providing immediate access to statutory or non-state psychological, medical, and social support services.
3. Conducting immediate administrative internal reviews to determine contractual or employment suspensions, while protecting the legal rights of the informant against retaliation.
4. Escalating verified alerts to external legal authorities.

External Referral Authorities

Where immediate danger exists or criminal code violations are suspected, cases must be referred directly to:

1. **Law Enforcement:** The police and prosecutor's office via the national emergency line **112**.
2. **Statutory Social Services:** Local Social Assistance departments (with prior permission of an adult survivor, or automatically without permission if the victim is a child).

All the allegations will be sent over to the local police departments and prosecutors' and local assistance department offices.

6. Reporting Pathways and Procedures

P4EC strives to ensuring that all staff and those who work with us are clear on what steps to take where suspicions or concerns arise regarding allegations of sexual exploitation or abuse of the vulnerable populations where we work.

P4EC will ensure that immediate action is taken to identify and address reports of sexual exploitation and abuse and ensure the safety and well-being of the person being sexually exploited or abused.

Any individual—whether a beneficiary, witness, or staff member—can report an incident of SEA concerning a P4EC representative without fear of retribution or retaliation. P4EC staff members are strictly prohibited from attempting to carry out independent criminal investigations.

IF YOU HAVE A CONCERN PLEASE CONTACT:

Daniela Mămăligă – P4EC Director
email: dmamaliga@p4ec.md, phone: +(373)69137464
Viorica Postolaki – P4EC Child Protection Officer
email: vpostolaki@p4ec.md, phone: +(373)69137461

Information to include in a report (where available):

- A factual description of the alleged event, matter, or behavior.
- The names and titles of the individuals involved.
- Dates, times, specific locations, and frequency of the behavior.
- Any supporting documentation, names of witnesses, or available evidence.

All the reports received by P4EC will be addressed in accordance with the legislation of the Republic of Moldova, being reported to law enforcement bodies as required. In cases where an adult victim refuses to report the case to law enforcement bodies, as well as in cases of Sexual harassment reported by a staff member, internal investigations will be performed.

Enforcement: Any P4EC representative who carries out retaliatory action against a complainant, survivor, or witness will face immediate contract termination and a direct referral to state law enforcement.

7. Confidentiality

Reports may be submitted anonymously and every effort will be made to preserve absolute confidentiality throughout the review process. Personal identifying data will be restricted exclusively to essential personnel and will not be shared without informed consent, except in instances where a child is at risk, someone's life is in immediate danger, or when explicit criminal disclosure is mandated by Moldovan law. Any staff member who breaches case confidentiality will face immediate disciplinary action up to and including termination of employment.

8. Whistleblower protection mechanism

In strict compliance with national legislation, P4EC prohibits any direct or indirect act of reprisal, discrimination, or professional sanction against a whistleblower who reports a suspicion in good faith.

Personnel who report misconduct or cooperate with an official investigation shall not be sanctioned, demoted, terminated, transferred, or subjected to any negative organizational measures as a result of their report. P4EC commits to:

1. Maintaining secure systems that enable confidential reporting of organizational wrongdoing.
2. Providing appropriate protection, clear reporting instructions, and well-being support to individuals disclosing systemic risks.
3. Investigating all complaints fairly, while taking appropriate punitive action if claims are legally substantiated or if disclosures are proven to be intentionally malicious and made in bad faith.