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Prevention of Sexual Exploitation and Abuse Policy

AO Gender-Centre

June 2023

Prevention of Sexual Exploitation and Abuse Policy

Sexual Exploitation and Abuse (SEA) represent grave breaches of the right to safety, security and dignity of forcibly displaced and stateless persons. Prevention of Sexual Exploitation and Abuse (PSEA) policies and practices aim to reduce the risk of, prevent and respond to SEA by UN personnel, NGO partners, or other entities and persons involved in providing humanitarian or development assistance, including government staff, contractors, and community volunteers and workers, to ensure that allegations of SEA are reported and responded to in a timely and appropriate manner, and that victims of SEA are referred to support and assistance needed in line with a victim centred approach.¹

Purpose

Gender-Centre recognizes our obligation and responsibility to operate in a manner consistent with the fundamental principles of human rights and we are committed to the prevention of and response to sexual exploitation and abuse. Gender-Centre recognizes that sexual exploitation and abuse of vulnerable people is a global phenomenon and from our own and others' experience, it is clear that working in development can entail dealing with these issues. It is vital that sexual exploitation and abuse are not perpetrated or compounded by those who Gender-Centre employs. It is crucial that we all understand the problem of sexual exploitation and abuse and our own role and responsibility in preventing it. Employees need to consider how their sexual conduct might cause serious harm to others and bring Gender-Centre into disrepute.

Scope

- This policy applies to all employees, volunteers, consultants, contractors, representatives and those connected to Gender-Centre. They should ensure their conduct:
- Is never influenced by personal gain or advantage that results in a risk or detriment to Gender-Centre
- Does not give rise to suspicion of improper motives
- Is in keeping with Gender-Centre's policies and procedures
- Respects and never violates the rights of vulnerable people
- Is professional and that they act ethically and in accordance with the Gender-Centre Code of Conduct.

Legal and regulatory framework

This Policy has been drawn up on the basis of law and guidance that seeks to protect women affected by DV, SV and THB, namely:

- The Convention on the Elimination of all forms of Discrimination against Women ([CEDAW](#));
- The Council of Europe Convention on preventing and combating violence against women and domestic violence ("[The Istanbul Convention](#)");
- [Combating violence against women](#): minimum standards for support services, Council of Europe
- [WAVE-HANDBOOK](#) Prevention and Support Standards for Women Survivors of Violence A HANDBOOK FOR THE IMPLEMENTATION OF THE ISTANBUL CONVENTION

¹ <https://emergency.unhcr.org/protection/protection-principles/protection-sexual-exploitation-and-abuse-psea>

- The Council of Europe [Convention on Action against Trafficking in Human Beings](#)
- [Directive](#) of the European Parliament and of the Council on preventing and combating trafficking in human beings
- [Law No. 45](#) from March 01, 2007 on prevention and combating domestic violence
- Law No. 196 from July 28, 2016 on amending some normative acts (related to the response in cases of domestic violence)
- [Law No. 113](#) from July 09, 2020 on amending some normative acts (related to domestic violence)
- Law No. 137 from July 29, 2016 on rehabilitation of victims of crimes
- [Law No. 241](#) from October 20, 2005 on preventing and combatting trafficking in human beings
- [Law No. 105](#) from May 16, 2008 on the protection of witnesses and other participants in criminal proceedings
- [National Strategy on prevention and combating domestic violence](#) and violence against women 2018-2023, National Action Plan 2018-2020 and National Action Plan 2021-2022
- The National Program on preventing and combating violence against women and domestic violence for the years 2023-2027² (approved by GOVERNMENT DECISION No. 332 from 31-05-2023)
- The National Program on implementation of Resolution 1325 of the UN Security Council on women, peace and security for years 2023-2027³ (approved by GOVERNMENT DECISION No. 152 from 22-03-2023)
- Government Decision no. 461 of 22.05.2018, regarding the approval of the National Strategy to prevent and combat human trafficking for the years 2018-2023 and the Action Plans for its implementation
- Governmental Decision no. 575 from 19.07.2017 on Guideline on SoP for National Toll free Hot Line for women – victims of domestic violence and violence against women
- [Law No. 140](#) from June 14, 2013 on a special protection of children at risk and of children separated from their parents
- Governmental Decision nr. 270 on Guidelines on inter-sectorial mechanism of cooperation for identification, evaluation, referral, assistance and monitoring of children victims and potential victims of violence, neglect, exploitation and trafficking
- [Criminal Code](#) and [Criminal Procedure Code](#) of the Republic of Moldova
- [Civil Code](#) and [Contravention Code](#), articles related to DV and SV
- [Law No. 133](#) on personal data protection.

Policy

As per this Prevention of Sexual Exploitation and Abuse Policy (PSEA), Gender-Centre will not tolerate sexually abusive or exploitative acts being perpetrated by our employees, contractors, volunteers or anyone associated with the delivery of our programmes. Employees and managers are bound to uphold this policy and to report people or incidents that they believe contravene it. Gender-Centre managers and Gender-Centre corporate leadership have a duty to ensure that allegations of sexual exploitation and abuse are investigated and that appropriate disciplinary measures are taken. Gender-Centre also has a duty to provide appropriate assistance to any victims of sexual exploitation and abuse by our staff.

² https://www.legis.md/cautare/getResults?doc_id=138005&lang=ro

³ https://www.legis.md/cautare/getResults?doc_id=136728&lang=ro

Definitions

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions⁴.

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another⁵.

Violence against women – violation of human rights and a form of discrimination against women that shall mean all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.

Domestic violence – all acts of physical, sexual, psychological, spiritual or economic violence, except actions of self-defence or defence of another person, including the threat of such acts, committed by a family member against another member of the same family, which caused material or moral damage to the victim.

Gender-based violence against women - violence that is directed against a woman because she is a woman or that affects women disproportionately.

Sexual harassment - any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual violence means:

- engaging in non-consensual vaginal, anal or oral penetration of a sexual nature of the body of another person with any bodily part or object;
- engaging in other non-consensual acts of a sexual nature with a person;
- causing another person to engage in non-consensual acts of a sexual nature with a third person.

Trafficking in human beings – the recruitment, transportation, transfer, harbouring or reception of persons, by means of threat or use of force or other forms of coercion; by abduction, fraud, deception, abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits of any kind to achieve the consent of a person having control over another person, for the purpose of exploitation.

Exploitation of the person - abuse of the person for profit, namely:

a) the obligation to perform certain jobs or provide services by resorting to force, threats or other means of coercion, contrary to the legal provisions regarding working conditions, wages, health and safety;

⁴ Secretary-General's Bulletin: [Special measures](#) for protection from sexual exploitation and sexual abuse, ST/SGB/2003/13.

⁵ Secretary-General's Bulletin: [Special measures](#) for protection from sexual exploitation and sexual abuse, ST/SGB/2003/13.

b) keeping in slavery, applying certain practices similar to slavery or resorting to other procedures for deprivation of liberty;

c) commercial or non-commercial sexual exploitation.

Survivor - is a person who has experienced gender-based violence. The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors, while the term 'survivor' is generally preferred in the psychological and social support sectors because it implies resiliency.⁶ This document employs the term 'survivor' to reinforce the concept of resiliency.

Risk assessment and management

Risk assessment and risk management – represents an activity aimed to identify the current risks to the implementation of the Safeguarding policy and internal procedures of the Issues Affecting Women programme.

The Director of Issues Affecting Women programme/Safeguarding Officer is responsible for doing the risk assessment and risk management. In order to identify the risks of implementation, the following steps shall be taken:

1. *Identify the risks* – the Programme Director/Safeguarding Officer will involve all personnel of the programme in this exercise.

2. *Group risks* according to where they might occur in the organisation (Risk Assessment Form – **Annex 1**)

3. *Rank the risks* – in terms of low, medium or high risk using the guiding questions:

- What/how bad would the consequences be?
- What is the likelihood of the consequences occurring?

4. *Decide on next steps*. Once the risk assessment is done following steps will be taken in order to manage the risks:

- identifying ways of reducing the risks
- deciding in advance what to do if things do go wrong
- giving roles to different people to monitor and manage the implementation of the Safeguarding Policy and Procedures.

4. Recruitment and training of personnel

Safe recruitment

- All job interviews will specifically contain a question relating to the candidates previous history and suitability of working with women with different level of vulnerability to gender based violence.

⁶ Inter-Agency Standing Committee. 2015. Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action: Reducing risk, promoting resilience and aiding recovery.

- All staff will sign a declaration on their own responsibility that have no criminal convictions and that have not committed any crimes of sexual abuse or sexual exploitation (**Annex 2***).
- All staff will sign a declaration on their own responsibility that their 1st degree⁷ relatives, husband/wife has no criminal convictions related to offences of sexual abuse or sexual exploitation (**Annex 2***).
- All candidates shall sign the Confirmation of Reading the Safeguarding Policy before beginning to work with Gender Centru (**Annex 2**).
- All candidates shall submit the Curriculum Vitae and a motivation letter. Only preselected candidates will be invited to interview.

Education & Training

- The training on Safeguarding Policy, including awareness raising and reporting systems will be provided to staff on a yearly basis – this includes yearly refresher courses for staff who have been employed for more than one year.
- All new staff will be given instruction on the women protection policies as part of their job orientation. The timing of this will be at the discretion of the Programme Director/Safeguarding Officer, but within 3 months from the employment or before the probation period ends.
- All staff shall have access to the Safeguarding Policy and internal procedures' documents (available on the online platform of the organization).

5. Responsibilities

All staff members have responsibility to adhere to the guidance laid out in this policy and related documents. Likewise, all employees have a responsibility to report any concern regarding a beneficiary's health/physical or mental condition, following the internal reporting procedures set forth in this Policy. «Gender Centru» expects all staff members to promote the good practice of working with beneficiaries by being a role model for professional behaviour, contribute to pro-actively involving partner institutions in developing/supporting the safe practices and implementing the beneficiary centred approach.

The responsibilities described below are derived from the principles of work and mandate of «Gender Centru».

General responsibilities

- **Empowering beneficiaries.** The staff members shall inform the beneficiaries about their rights, acceptable and unacceptable behaviours and what are the ways of preventing or reporting a case of gender based violence. Empowerment can be done either through direct work or through informational materials, awareness campaigns and social media.
- **Adapting individual needs oriented models.** Staff members should know how to evaluate the risks, identify the needs and develop and individual working/intervention plan of each

⁷ First degree relatives mean: mother, father, son/daughter.

beneficiary and adjust their interaction model to reflect the individual level of development and needs.

- **Gender-based approach.** Staff members must show equal treatment for boys and girls. Gender mainstreaming should be used in order to integrate the perspective of gender equality in the teaching curriculum and printed/video materials.
- **Informing** the Programme Director about any circumstances that contradict with the eligibility criteria and could create impediments to the efficient fulfilment of the responsibilities.
- **Involving the voice of the beneficiary** in any organization activities. Staff members need to involve beneficiaries in decision-making and encourage them to make their own decisions. The beneficiaries will be taught to evaluate the risks and the consequences of actions and will be encouraged to find positive solutions.

Additional specific responsibilities

- *Board has the responsibility to ensure:*
 - The Safeguarding policy of the Issues affecting women programme is in place and appropriate
- *President has the responsibility to ensure:*
 - The policy is accessible to all staff members and partner organizations
 - Sufficient resources (time and financial) are allocated to ensure that the policy is effectively implemented
 - Designation of Safeguarding Officer responsible for the implementation of the Safeguarding Policy
 - Use of internal and legal procedures to manage any allegations of domestic violence, sexual violence or THB against staff members appropriately and in correspondence with the legislation of the Republic of Moldova
- *Safeguarding Officer is responsible to ensure:*
 - The policy is monitored and reviewed
 - The policy is implemented
 - The present and future Strategic Plans and associated Projects design and implementation are based on core principles of women's rights and gender equality
 - The women's protection and safeguarding practices are adopted through relevant procedures for staff
 - Staff members have access to appropriate training/information and supervision
 - Staff's reports on violence against women are received and respond to all allegations seriously, swiftly and appropriately
 - The process of recruitment, selection, induction, training and supervision of newly employed staff protects the beneficiaries' rights and confidentiality, is performed safely and ensures all the necessary background checks are made

- Within the Program, appropriate procedures are created and instituted to maintain an environment in which no acts of intimidation are found
- The safe physical environment to beneficiaries and staff members is provided
- *Trust line, Hotline staff and managers are responsible to ensure:*
 - The development and implementation of the procedures for counselling and intervention/referrals of reported cases of violence against women/trafficking in human beings
 - The callers who access the trustline/hotline, receive necessary information about good practices and safety
 - The beneficiaries' opinions are valued, listened to and respected
 - Professional and secure record and storage of confidential information and protection of the shared data with the third parties
 - The principles of protection of personal data shared with third parties are respected
 - The regular update of database of national and local services available to the survivors of DV, SV and THB
- *Lawyer(attorney) is responsible to ensure:*
 - Professional and secure record and storage of confidential information
 - Protection of the shared data with the third parties is respected
 - Practice of legal advice/representation is based on the code of ethics of legal practitioners
 - The survivors' opinions are valued, listened to and respected
- *Psychologists are responsible to ensure:*
 - Professional and secure record and storage of confidential information
 - Protection of the shared data with the third parties is respected
 - The survivors' opinions are valued, listened to and respected
 - Practice of counselling/interviewing/interaction with survivors is based on the code of ethics of psychologists
- *Communication specialist is responsible to ensure:*
 - The principles of relationship, communication and dissemination of information are accessible to the general public
 - The office communication strategy reflects the respect of women's rights and serves beneficiaries best interest
 - The materials used for external communication (printed, video, audio) protect dignity and identity of beneficiaries and provide an empowering message

- The voice and reputation of the Issues Affecting Women Programme as a leading survivors-focused Service is promoted in media and public sphere

Our responsibilities

It is the responsibility of our managers, employees and anyone who works with us to report incidences of sexual exploitation and abuse being perpetrated by anyone within Gender-Centre. Managers, in particular, are responsible for creating and maintaining an environment in which employees, volunteers and contractors know what Gender-Centre expects from them and feel able to report any suspicious or inappropriate behaviour.

***Exceptions**

In line with international standards employees will not have sexual relations with children (defined as under 18 years old) or with clients. Should staff find themselves in such a relationship, or contemplating such a relationship, they must report this to HC for appropriate guidance in the knowledge that this matter will be treated with due discretion. Gender-Centre will review matters to ensure the relationship is truly non-exploitive and consensual.

Our Partners

Gender-Centre is clear that any partnerships we have with others is based on mutual respect for values and beliefs. When Gender-Centre employees assess partner capacity to carry out projects this should include an assessment of the partner's capacity to meet our requirements in upholding this policy and the Gender-Centre Code of Conduct.

Information security and data protection

The aims of information security and data protection are to ensure the availability, integrity and confidentiality of information. It is paramount for the existence of «Gender Centru» and it is trust worthy to take steps to guarantee that access to information is provided to those accredited persons/institutions that require it, whilst at the same time to ensure that confidential and sensitive information (electronic and paper records) is kept secure and has restricted access⁸.

All staff members mentioned above encounter different levels of interaction with the beneficiaries; based on the level of interaction, each staff member has separate level of access to the information collected and stored. There are 3 levels of information collected, stored and shared. It is the Women's Programme Director who reviews and assigns the appropriate levels to information.

Level 1: Public

This is information that is intended to be available to general public and is generally regarded as publicly available: reports, manuals, online contents, informational materials, TV and radio spots, etc. Prior to disclosure, public information is subject to appropriate review and excludes any indicators which will allow identification of any specific beneficiary of the programme.

Level 2: Internal use

This is information, which is protected due to ethical or privacy consideration. Such information refers to analysis of data used for the research, statistics, data on cases collected by the staff, etc. Although not specifically protected by legal obligations, unauthorised use, access, disclosure of information at this level could result in damage to «Gender Centru» reputation and violate individual rights to

⁸ Data Protection Policy

privacy. All staff members who have access to information for internal use are informed on their obligations.

Level 3: Confidential

The third level of information collection and storage includes all paper and electronic data with regards to individual cases, confidential correspondence with third parties. Such information is intended solely for use within *the organization* by a limited number of employed staff whose role and responsibility is direct intervention in the case. Such employees are signing the confidentiality agreement with «Gender Centru».

“Gender Centru” acknowledges that all of the presumed cases of domestic violence, sexual violence and trafficked cases will be reported to the respective state institutions (Ministry of Internal Affairs or Ministry of Labour and Social Protection, etc.) only with the permission of the adult beneficiary, exception are child cases, when permission is not necessary. Such reporting may include (and is not limited to) written correspondence, transmission of video/audio materials, excerpts from telephonic/chat conversations. All above-mentioned transmission of information shall be marked and treated as Confidential; and the persons providing the information must be informed on any further actions/interventions and their consent must be sought.

Tools used to protect the confidentiality of the cases include, as minimum:

- Records of each contact with a child or their caretaker;
- Separation of individual cases and its separate storage;
- Personal responsibility on the collection and transmission of the data by signature and date by the person who makes them;
- 24 hours’ time limit for recording a new case/intervention;
- Informing the beneficiaries about the data collection, record keeping and reasons for that;
- Secure storage of the hard copies of personal records and portable electronic equipment;
- Official written correspondence with third parties.
- Clear procedures stating on the staff access to data and securing individualised access to registries/databases.

8. Implementation, evaluation and monitoring

The Board and the President of «Gender Centru» are ultimately accountable for this policy.

The Director is responsible for conceptualization and monitoring of this document; and the other staff members are responsible for implementation of the Programme. The monitoring and evaluation process is made through constant tracking of the Programme implementation, qualitative analysis of the results achieved and its adherence to the organization’s mission, values and action plan.

Regular monitoring of the Programme is important to ensure that implementation is on track and to make timely adjustments to improve the quality of the services provided and activities conducted. The monitoring system for the Programme includes the tools and processes for regularly tracking of the following outputs:

- **Registration** – the number of beneficiaries registered by the existing services (national toll free for women, national anti-trafficking hotline, informational portal, psychological services and legal assistance and representation service). Disaggregated information is collected on number of calls/requests/attendance, listing sex, age of the beneficiary and issues addressed at a minimum.
- **Attendance** - the number of beneficiaries attending the psychologists/lawyers for the purpose of psychosocial counselling and/or evaluations reports. Disaggregated information is collected on attendance, listing issues discussed at a minimum.
- **Activities** – the type of activities conducted by the Issues Affecting Women Programme each day. This should be captured in a timetable that is updated as the activity schedule changes.
- **Referrals** – the number of beneficiaries of the existing services who are referred to other services.

Evaluation represents an activity carried by the Women's Programme Director on an early basis with the aim to establish the outcome of the activities in relation to stated objectives and expected impact. The impact evaluation measures whether the Programme directly led to changes in protection risks, beneficiaries' wellbeing outcomes and community knowledge and capacities. The evaluation will answer the three questions:

- How effective is the Programme in providing a protective environment to vulnerable women to GBV violence, domestic violence, sexual violence and THB?
- How effective is the Programme in providing psychological support and legal assistance to survivors?
- How effective is the Programme in mobilizing and equipping professionals to fulfill their roles to protect and prevent violence against women.

The policy will be reviewed at minimum of every 3 years or when it is shown necessary that additional issues need to be identified and addressed through this policy (as reflected in the **Annex Recognition, report and sanctions in case of professional misbehaviour or allegations of abuse of the staff members**

The staff of «Gender Centru» are responsible for timely identification and reporting of the possible cases of abuse and breaches of professional boundaries. All reports should be made following relevant Reporting Procedures and Reporting Flowchart (**Annex 7**).

Possible signs of breach of professional boundaries:

- **Distress.** Pay attention to verbal and non-verbal reaction of the beneficiary to your presence. In situations of observed unusual distress or agitation, consult your supervisor.
- **Deception.** If you find out that a beneficiary lies about something during his/her meetings with you, identify the nature of the lie and its author and report to your supervisor. Also, if another staff member asks you to lie/hide information regarding any interaction with a beneficiary, report it to your supervisor.

- **Undocumented interaction.** Any information about private, un-controlled or un-reported interaction (physical or virtual) of a staff member with a beneficiary shall be reported to the supervisor.
- **Abuse.** Any allegations of abuse which you receive from the beneficiary or any other person shall be reported immediately. Such allegations include, but are not limited to:
 - Hitting, beating or otherwise physically assaulting the beneficiary;
 - Persuading the beneficiary into physical or sexual relationship;
 - Behaving in sexually provocative manner;
 - Acting in ways that intend to humiliate, degrade or debilitate the person; etc.
- **Report.** Staff members are encouraged to raise concerns and report any signs of professional misbehaviours.

Any person within the organization shall report immediately or within a maximum of 24 hours to the Director any suspicion of a violation of the women's safeguarding policy against sexual abuse and exploitation, namely:

- A practice or behaviour that indicates that a person employed by Gender Centru, abusing his position, sexually abused or sexually exploited a beneficiary of the organization;
- A suspicion that a person employed by Gender Centru violated the women's safeguarding policy outside the work environment and committed an abuse towards a person who is not a beneficiary of the "Gender Centru";
- Concerns regarding some previous actions/experiences of a person employed by the "Gender Centru", which would imply a possible abuse or sexual exploitation committed;
- Some concerns observed and expressed by someone from the organization's external partners regarding the behaviour/actions of a person employed by Gender Centru.

The Program Director will take the information, collect all the details about this suspicion and other information (written evidence, video, audio) that confirms what was reported and will send a written action to the President.

If a possible case of abuse committed by one of the Gender Centru employees has been reported, the President will convene the Executive Board within 24 hours to analyse this report. The Executive Board will further establish what are the following actions that must be taken: concretizing some details regarding the reported situation, interviewing the witness/person who reported the case, or if there is sufficient information confirming the abuse, the report can be sent immediately to the legal authorities. Law enforcement agencies will have the responsibility to further investigate the circumstances to confirm or deny the suspicion raised. The Secretary of the Executive Board will draw up minutes of this meeting, describing what was discussed and the decisions taken. The Executive Board will determine who will be responsible for monitoring the actions taken by law enforcement bodies and the purpose of the investigations carried out. During the investigation, the individual employment contract with the person concerned will be suspended.

If a possible case of violation of the provisions of the Safeguarding Policy, which does not concern the responsibility to protect beneficiaries from abuse or sexual exploitation, has been reported, the Director of the Women's Program/Safeguarding Officer will also notify the President with regarding

the violation committed. The President will convene the Executive Board within a maximum of 24 hours to analyse this report and determine the next actions to be taken. Minutes of the meeting will be drawn up, which will describe what was discussed and the decisions made. Violation of the safeguarding policy and non-compliance with the specific and general responsibilities described, may be followed by disciplinary sanctions, termination of employment, termination of contractual and partnership agreements or other actions according to the legislation in force. When establishing the sanction, the provisions of the legislation regulating the labour relations between the employee and the employer will be taken into account.

Depending on the seriousness of the deed committed by the employee, the "Gender Centru" is entitled to organize a service investigation, the duration of which cannot exceed one month. During the investigation, the employee has the right to explain his attitude and to present to the person authorized to carry out the investigation all the evidence and justifications the employee considers necessary.

Identification, report and interventions in cases of allegations of abuse

The Services of Gender Centru are responsible for timely identification, reporting and interventions in cases of violence against women:

- National toll free hotline for women and girls 0 8008 8008
- National toll free anti-trafficking hotline 0 800 77777
- Informational portal www.migratiesigura.md;
- Psychological counselling
- Legal assistance and representation service.

The identification, reporting and intervention in cases of allegations of abuse are described in each service's Guidelines.

Each service's coordinator is responsible for timely and qualitative response of the staff member responsible for each individual case.

Annex 1: Risk Assessment Form

AREAS OF RISK	AREAS OF CONCERN	High	Medium	Low
Recruitment of staff				
Management of staff				
Policy and Procedures that help protect women				
Activities with beneficiaries				
Induction/training or support of staff				
Context and environment in which the organization operates				
Organizational culture				
Communication and consultation with others				
Monitoring and evaluation				
Reporting and responding to concerns				

Annex 2: Confirmation of reading

I confirm that I have been made fully aware of, and understand the contents of the Safeguarding policy of Gender Centru.

Employee/Subcontractor

Name: _____

Signature: _____

Date: _____

Contact details

Programme Director of the Issues Affecting Women Programme

Name

Phone/email

We are committed to reviewing our policy annually.

This policy was last reviewed on: **August 30, 2023**

Signed:

.....(Gender Centru President)

Annex 2*: Declaration on employee's own responsibility

Hereby, the undersigned _____ employed within the „Gender Centru”
as _____ confirm that:

1. I got acquainted with the document, I understood and I will respect the provisions of the Issues Affecting Programme, of all annexes and sectorial procedures during all my activity within the „Gender Centru”.
2. My professional experience and my previous activities can not harm in any way the purpose of Gender Centru's activities.
3. There is no personal interest in conflict with the interest of activities I conduct within Gender Centru.
4. I declare on my own responsibility that I have no criminal record and I have not committed any crimes of sexual abuse or sexual exploitation.
5. I declare on my own responsibility that my first degree relatives⁹ have not committed any of the offenses of sexual abuse or sexual exploitation.

Hereby, the undersigned will immediately inform the Safeguarding Officer about all changes that will appear in meantime during my activity within Gender Centru.

Date: _____

Signature: _____

⁹ First degree relatives mean: mother, father, son/daughter.

Annex 3: “Gender Centru” CODE OF CONDUCT

It is imperative that every employee of the “Gender Centru” understands that its professional responsibilities have at its core high standards of professionalism and integrity. The Code of Conduct gives written expression to what “Gender Centru” has long practiced and represents an open statement of organization’s beliefs and representation of the way it works.

Gender Centru employees are required to create and maintain an environment in which sexual exploitation or abuse is prevented and the application of its code of conduct is promoted.

The core values of the organization are:

- Respect for the human rights – we consider violence against women and children a grave violation of human rights;
- Respect for the beneficiaries’ decision about all aspects of their lives and treatment with dignity;
- Transparency and responsibility;
- Team work, exigency and flexibility.

Most of the employees of “Gender Centru” find themselves interacting with members of the other helping professions on a daily basis. Certainly this is so for the specialists working with other categories of vulnerable adults. Although the emphases differ somewhat from institution to institution, certain values are shared not only by those in public health, psychology, social work, but also by police, prosecution and judiciary. It is the responsibility of each staff member to promote the values of “Gender Centru” and therefore promote a shared frame of reference for conducting collaborative and interdisciplinary work.

As professionals and as individuals, the Code of Conduct helps us:

- To improve relationships and increase awareness of integrity issues - to be open about the principle of work and core values and educate partners and beneficiaries about what the organization is about and clarify the identity of the organization;
- To hold management accountable – to expect and require the upper-level management to exhibit honesty, transparency and integrity in their daily roles;
- To follow the national and international principles – to adhere to, adopt and exhibit best practices of professional behaviour;
- To make good decisions – to be alert of situations and actions which do not comply with organization’s values and may involve improper or illegal conduct.
- To carry out effective and professional work – to promote good standards of practice and quality services and protect the interests of the service users.

“Gender Centru” acknowledges that some professional practices may influence the decision making of the employee. In those circumstances follow the check-list:

- Am I authorised to do this?
- Is the action in line with the organization's core values?
- Is the action in line with the Service's Guidelines?
- Can I explain my logic and reasoning to the beneficiaries, colleagues, management and partners?
- Will my conduct allow us to maintain the trust of all our partners and beneficiaries?
- Would I be comfortable if someone treated me the same way?
- Would I be comfortable if my conduct appeared in the media?
- Am I demonstrating the highest ethical standards?
- Is it legal?

If at least one of the answers is "No", seek advice, weight the options and assess the risks and consequences.

If your decision will affect others (beneficiaries, colleagues, management and partners), confer with trusted colleagues and supervisors.

The Code of Conduct contains **5 main** principles that serve as standards of conduct at "Gender Centru". Together these represent an aid to professional behaviour and good decision making. The Code of Conduct is intended to help each staff member to recognise issues involving professional integrity and take appropriate actions with confidence.

1. Work with and treat others with respect.

One of the organization's great strengths is the diversity of the employees and beneficiaries. We cooperate, collaborate and communicate with people of different ages, cultures, nationalities and social and economic status. We are committed to treating each other with understanding, dignity and respect. We deal honestly and directly with beneficiaries, subcontractors, donors and partners – we represent the services and qualifications truthfully when advertising or negotiating.

We are committed to providing equal opportunity in all aspects of employment/career advancement and beneficiaries' assistance and to maintaining a work environment free from discrimination or harassment.

We demonstrate respect when we:

- Treat others fairly and respectfully, as we would want to be treated ourselves.
- Never use violent, threatening, hateful, harassing, or intimidating behaviour.
- Speak respectfully about individuals, peoples, countries, organizations, competitors, and beneficiaries.
- Use positive, open discussion to resolve problems and disagreements.

2. Achieve results.

The manner in which we achieve the results matters just as much as achieving them in striving for outstanding performance and results, do not compromise organization's ethics or principles. Adhere strictly to the existing action plan and strategy and participate actively in the formulation of early action plan and long-term strategy.

Know your partners and beneficiaries and transform the organization's strategy into concrete actions. Empower beneficiaries to become part of your actions and encourage the sense of their ownership in the process of the achieving of the results.

3. Be a leader

By actively contributing to social projects we strive to contribute to the solution of societal problems. We expect leadership by example – leadership is not an award, right or title – it is a privilege. This means that you inspire, motivate, communicate, influence and create.

As a leader, you represent your team and ultimately, the whole organization. Every word that flows from you, whether orally, by letter, email, or a text message is shaping and developing a [culture](#) in your organization or area of responsibility.

Be continually mindful of the pursuit of excellence and inspire others to higher levels of performance. We firmly value human dignity and human rights for all people. We promote zero tolerance on violence against women.

4. Raise the voices of the beneficiaries

Our reputation as individuals, professionals and as an organization depends on the trust we inspire in others, particularly our beneficiaries.

Recognise the importance of anticipating and responding to beneficiaries' needs and preferences. Treat the beneficiaries' opinions, concerns and enquires as important sources of information which should be used for improving the services and advocating for the beneficiaries.

Engage beneficiaries in your actions and develop policies and advocate through survivor's voices. Always follow the best interest of the beneficiary.

5. Make a difference.

Stay informed and shape the future. Create impact with your colleagues, partners and beneficiaries through your actions. Set goals, achieve them and compare the results. Build knowledge using new techniques and share it with others. Respond with agility to the changing environment.

Help solve important social problems in your community by contributing your professional expertise and collaborate with other organizations to achieve maximum results.

Annex 4: Principles and framework of institutional communication and media relations

The important role of the media in informing, sensitizing and educating the general public in any field of social activity is indisputable. Creating and maintaining the institutional website with an attractive and always up-to-date content, as well as establishing strategic partnerships with print and digital media, reflecting the activity and issues that the "Gender Centru" addresses and forwards to the authorities for resolution or for the purpose of raising awareness to the public are the primary objectives of the organization. Encouraging media representatives to address topics related to the organization's activity and the problems faced by the society is achieved by providing relevant content for the mass media and by conducting mass media or awareness campaigns.

At the same time, the fields of activity of the "Gender Centru" are specific, characterized by several guiding principles, such as **anonymity, confidentiality and avoiding victimization** of the organization's beneficiaries. In addition, the categories of beneficiaries we work with are under the protection of a series of international and national acts aimed at protecting the personal data and image of these beneficiaries. Compliance with these principles is even more important when it comes to children, especially child victims of sexual exploitation and sexual abuse, trafficking, child pornography, various abuses and aggressions in cyberspace.

At the same time, the employees of the "Gender Centru", in the context of relations with the mass media, are often caught between a rock and a hard place. On the one hand, journalists insist on documenting their reports, issue articles and interviews, especially radio and TV, with cases, concrete names of victims. On the other hand, our organization's employees are obliged to protect "the rights of survivors who are victims of domestic violence, sexual violence or human trafficking", the personal data, "privacy, identity and image of the victims by taking measures in accordance with domestic law in order to prevent the dissemination to the public of any information that could lead to their identification" ([Istanbul Convention](#)), while respecting the freedom of the press. All these circumstances led us to develop a policy concept on the protection of women and girls and the principles of media relations.

4.1. Institutional Communication

The primary mission of "Gender Centru" specialists as experts in the field is to protect the beneficiaries and avoid additional harm to the image of the victims and their families, simultaneously identifying the equation of respecting the freedom of the press, its free access to information. Even if victims initially agree to be identified (out of anger, out of a desire for revenge or to defend their rights through the media, etc.), they may not be fully aware of the consequences of this decision. The specialists of the "Gender Centru" believe that the harmful potential of such public appearances exceeds the potential benefits of the history made public, especially during the crisis period. In a state of affect, victims are not always able to take the necessary measures for their protection.

Taking into account these circumstances and relying on the experience of almost two decades, we have drawn up the present framework for institutional communication and relationship with the press.

Gender Centru Moldova's goal is to provide respect and honor to each beneficiary, especially related to the use of media and communication. We believe that each beneficiary has the right to their own story, testimony and image, and the communication about them should not victimize or violate their

rights related to identity protection. The Guidelines is designated and is mandatory to be respected by all employee and volunteering of Gender Centru Moldova.

4.1.1. Communication about victims: ethical aspects

Always keep in mind the best interest of survivor. Information dissemination about survivor's situation should be done in a way that respects physical and mental integrity, privacy and dignity.

Use appropriate language. All communications should respect individuals with reference to situations and descriptions. Words should be carefully chosen to not suggest shame, disrespect or blame.

The most accurate representation of the victim. The victim's portrait must not manipulate or reflect subjective feelings, opinions and assessments in any way. On the contrary, the description of the victim must provide a balanced picture of her/his life and circumstances, victims presented as individuals, with their own identity and whose dignity is respected.

Avoidance of images and language that may degrade or victimize the survivor. Information that may shame the survivor will not be provided. Generalizations that do not reflect the nature of the situation will be avoided. Report and documentations should present a completed picture. Subjective views should be avoided.

Freedom from discrimination of any kind. All employees are engaged in respecting all beneficiaries and treating them without discrimination.

Lack of personal and physical information about the survivor. Gender Centru staff will avoid giving information that may easily identify the location or name of a survivor and put her/him at risk. All case studies that highlight the work of Gender Centru will be presented with all personal data removed.

Limited access to data and information about Gender Centru's beneficiaries. Access to all data concerning beneficiaries will be done in accordance with Gender Centru's Data Protection Policies and Services' Regulations.

4.1.2. Content of the website and other official institutional channels for informing mass-media and public

The institutional website and other institutional communication channels will promote:

- current themes and problems, objectives and responsibilities to which the authorities have proven to have gaps;
- urgent themes and topics to be popularized in appropriate professional environments, among relevant structures and in society in general;
- legislative acts and national and international reports, current statistics, calendars of thematic events, ongoing projects and their results, policies that the authorities are going to adopt, including the lobbying initiatives of these policies;

- information and awareness campaigns, publications, news, constant reports about the activity in the territory, at the level of local structures (territorial commissions, MDT, their good practices, etc.)

The institutional website will NOT under any circumstances contain names, examples, and direct links to files or case histories that:

- will indicate the location, name or other content that helps to identify the victims or their families;
- will contain data or content that may cause any kind of harm to the beneficiaries or their families, respecting the principles of confidentiality, anonymity and protecting the beneficiaries from additional risks or repeated victimization;
- will contain the names or other personal information of the employees responsible for the services, which require compliance with the principles of confidentiality and anonymity.

4.2. Communication with mass-media and access to the organization's territory

4.2.1. General rules and recommendations for press

- "Gender Centru" does NOT mediate direct communication between victims and mass media representatives, does not facilitate contact between them and does not encourage coverage of cases of exploitation, sexual abuse, child trafficking, domestic violence, child pornography, uncoded or unprotected online abuse, which could result in repeated or, even worse, deeper victimization of the beneficiaries.
- "Gender Centru" recommends victims not to make hasty decisions, without consulting a specialist (psychologist, lawyer) before making public statements in sensitive cases for the victim or its family and before taking a course of therapy, psychological recovery and only after an exhaustive information regarding the possible risks and consequences of appearing in public.
- "Gender Centru" does NOT provide mass media representatives with information (texts, images or video) that refer to a specific case (just as doctors maintain the confidentiality of personal and patient health data).
- "Gender Centru" discourages any distribution by journalists and media sources of personal data about the victims and their families, including the use of content that facilitates their identification (e.g.: participation of the victim's family members in talk shows) as well as any textual, video or photo materials that may have a negative impact on the physical, mental health and dignity of the victims and their families.
- "Gender Centru" recommends mass media representatives to address the issue of abuse and sexual exploitation of children, child pornography, domestic violence and sexual violence against women and encourages them to prepare their media content as follows:
 - a. to research and evaluate the factors that contribute to abuse and violence against women and girls in the Republic of Moldova;

- b. to investigate and reflect on the long-term consequences generated by the inability/failure of the state or the authorities to prevent and combat domestic violence, sexual violence and human trafficking, insisting on the importance of early prevention efforts;
- c. to research and assess the real impact of policy documents in the field on the de facto situation (for example, changes, developments in the degree of vulnerability to violence against women and especially DV, SV and TFU, the ability to foresee and react immediately to new risk factors that exacerbate and deepen risk factors, etc.), to remove strategies/practices that do not work and encourage successful ones and good practices of other states;
- d. to generate advice and promote case studies useful to the general public, helping them to identify the situations and risk factors to which they are exposed; to come up with tips and recommendations on how to avoid them and where, which authorities or services, to turn to for help.

4.2.2. Use of photo and video images with children

In order to be able to take and use photos and video images with children who are beneficiaries of the institution, journalists, photographers and video operators must comply with the following conditions:

- seek permission from both children and their carers/parents before taking photos, except in exceptional cases where the child's best interests make it possible or preferable;
- in the recorded images, emphasize the activity, not the image of the children and, when possible, reflect groups of children and not individual children;
- always inform the child's caregiver and the child about the purpose of using the images in which the child appears. The consent/permission of the child's caregiver will also include the description of the purpose of using this information;
- not to take the images out of context (for ex. the image must be accompanied by an explanatory text where possible and must be relevant to the accompanying text);
- not publish any photograph or image of any identifiable child in any publication that reflects any aspect of commercial sexual exploitation and/or abuse. This prohibition must be respected even if the parent or guardian has given their consent.

4.2.3. Instructions regarding access to the territory of the organization (for journalists, photographers, video operators)

- All questions must be presented to the "Gender Centru" representative before the interviews. If they consider it necessary, the staff has the right to modify or not answer some questions.
- At the request of "Gender Centru" staff, media representatives must stop interviewing the beneficiary, if it is inappropriate or causes distress.
- Children cannot be interviewed about trauma or abuse. All questions to children should be about positive experiences only. Journalists will not be allowed to ask children about the situation of sexual abuse or exploitation.

- When talking about cases of trafficking or sexual exploitation, the faces of the victims cannot be shown. Protection of the victim's identity is guaranteed. This includes information regarding victims' relatives, current names, specific locations, or any other specific information that may lead to the identification of the victim's child or family members.
- The children will be interviewed in the presence of the parent, the caregiver, a "Gender Centru" specialist or any other professional (lawyer, psychologist, etc.)

4.2.4. External communication and relationship with the press

The "Gender Centru" draws up its own circuit diagram of personal data or data subject to the principles of confidentiality and anonymity vertically and horizontally.

Each subdivision designates, in agreement with the management of the organization, 1-2 employees, well acquainted with the legislation on the protection of personal or internal data and having the skills of synthesis and generalization, who will collect, store and provide them to the person in charge superior, according to the scheme.

In each subdivision, the management of the organization will appoint and train a person responsible for communication. It will be able to communicate literarily, logically and coherently with media representatives and will show discernment in selecting, dosing and compartmentalizing contents that will bring added value to the image of the organization without harming its prestige.

Within the organization, the right and obligation to relate to the mass media or to designate the person who will relate on one content or another is held by: the President, the program director and the communication specialist.

4.2.5. Communication with donors and contractors

Communication with donors and contractors is the exclusive competence of the management of the "Gender Centru" (President or project manager). The "Gender Centru" will publish laws, conventions, codes of ethics and other mechanisms that regulate and harmonize press freedom and access to information with the principle of personal data protection, avoiding content that may harm the image, personal life or aspects of privacy of beneficiaries and employees.

4.2.6. Protocols for visitors

- All visitors are expected to respect the rights of Gender Centru beneficiaries.
- Visitors shall not flirt with a beneficiary or youth or touch in a way that violates individual privacy.
- Visitors are not allowed to give money, presents to beneficiaries without prior authorization from the Gender Centru.
- Gender Centru's visitors shall not use or exploit a beneficiary in any way. This includes physical abuse, mental and emotional abuse, sexual abuse and spiritual abuse.

- It is not permissible for visitors to take photographs or video footage of children, youth or project locations without prior authorization from the Gender Centru staff.
- Gender Centru's visitors shall not disclose any information (name, locations, stories of specific victims, etc.) relating to survivors or partner organizations that are considered confidential and/or internal to any outside party. This includes verbal disclosure, distributing internal document, sharing information on the Internet.

Annex 5: Consent Form

I hereby grant permission to the Gender Centru to take and use photographs, videotape and/or digital images during the conducted activities or events for use in published materials, digital presentations or other legal purposes. I authorize the use of these images without compensation to me.

All negatives, positives, prints, digital reproductions and videotape shall be the property of the Gender Centru.

Use my real name in materials produced

Beneficiary: _____yes _____no

AGREED TO BY:

Signature of beneficiary _____

Print name _____

Date _____

Signature_____

Print name_____

Date _____

Annex 6: Monitoring and evaluation plan

What do we monitor?	By which means?	How often?	Who is responsible?
If procedures are implemented	• All staff signed the policy and are briefed on it; • Standards for recruitment & selection of staff applied; • Training started & continued; • Document with responsibilities for staff developed; • Monitoring mechanism developed and applied	At the start	Programme Director/Safeguarding Officer
The organization want to know the impact of the policy on:			
Target group: Staff - Compliance of staff with Safeguarding Policy	Reports on breaching the Code? Disciplinary procedures applied? Is it documented? How?	Annually	Programme Director/Safeguarding Officer
Target group: beneficiaries - Case management	• Was the case dealt with according the criteria set by your policy? • How was the beneficiary assisted? • How was the suspected person dealt with? • How was the case documented?	Biannually	Programme Director/Safeguarding Officer
Target groups: organization itself & staff - Effectiveness of our policy	Questionnaire Ongoing evaluation through team meetings	Continuously	Programme Director/Safeguarding Officer

Our partners/grantees: - Status of Safeguarding Policy	Develop minim standards and provide support/raise awareness	Parallel to implementation of policy	Programme Director/Safeguarding Officer
Opinion of relevant external environments on our policies	Questionnaire, seeking to get opinions from regular meetings, discussions, etc.	Continuously	Programme Director/Safeguarding Officer
Reviewing procedures of Safeguarding Policy in general	A Team within the organization	Every 3 years	Programme Director/Safeguarding Officer

Annex 7: Reporting flowchart

Abuse committed by Gender Centru employee

You become aware of, concerned about, observe or suspect:

- ✓ Gender Centru Staff, partners, visitors or contractors abuse or exploit a beneficiary
- ✓ Gender Centru Staff, partners, visitors or contractors breach the Code of Conduct
- ✓ Any incident of abuse or exploitation within Gender Centru
- ✓ Any misconduct related to implementation/respect of Safeguarding Policy and related Internal Policies



Immediately or within 24 h

Report to Programme Director/Safeguarding Officer



The Programme Director/Safeguarding Officer will manage the report, investigation and next steps. All detailed information will be further being sent to the President of Gender Centru.

Annex 8: Consent to processing of personal data

Consent

to processing of personal data in the Beneficiary Record System
of the Issues affecting women program within the "Gender Centru"

I, _____, ID _____, beneficiary of the Issues affecting women

Name, surname

program of the „Gender Centru” and parent of the children:

- _____ ID _____
- _____ ID _____
- _____ ID _____

with this consent, I declare that I agree for the "Gender Centru" to process my personal data and that of my child/children in accordance with the provisions of the legislation in force for purposes related to the provision of the necessary assistance for me.

I authorize my personal data and that of my child/children to be used for any procedures, processing, which may be generated now and for the future according to the provisions of the legislation in force.

I confirm that in connection with the processing of my personal data and that of my child/children, as well as pursuant to the provisions of *the Personal Data Protection Law no. 133 of July 08, 2011*, I was informed about the possibility of exercising any of the following rights:

- a) To be informed about whether my personal data and that of my child/children are or are not being processed, regarding the purposes of the processing, the categories of data considered and the recipients or categories of recipients to whom the data is disclosed ;
- b) To receive information regarding the operating principles of the mechanism by which the automated processing of my personal data is carried out;
- c) To receive information regarding the legal consequences generated by the processing of personal data;
- d) To receive full information on my personal data and that of my child/children, as well as on how they are processed;
- e) To have free and free of charge access to my personal data and that of my child/children, including the right to a copy of any legal document containing my personal data and that of my child/children, in the manner established by the „ Gender Centru", except in the cases provided by the legislation;
- f) To challenge in court any illegal actions or inactions of the "Gender Centru" admitted to the processing (obtaining, keeping, transmitting, modifying, using, etc.) of my personal data and that of my child/children.

Name, surname of the beneficiary Name, surname of the legal representative Signature
Date _____

*The document contains personal data, processed in **the Registry of beneficiaries of the Issues affecting women program no. 0001782-003**, registered in the Registry of personal data operators www.registru.datepersonale.md. The subsequent processing of these data can only be carried out under the conditions provided by the Law no. 133 of July 08, 2011 regarding the protection of personal data.*

Annex 9: Protection of beneficiaries in the humanitarian context: specific aspects

Humanitarian action brings many benefits to people, saving lives and alleviating suffering. However, we also know that humanitarian work has the potential to cause harm. In most cases this is unintentional, but at times it may be planned and purposeful, such as someone abusing their position to exploit others. In all cases, we must take proactive measures to ensure we do not cause harm to people, nor undermine the norms, principles, standards and values that underpin our work. This includes being conflict sensitive, preventing or reducing the risks of gender-based violence, and upholding humanitarian principles.

At an organizational level, these proactive measures must include those that prevent us employing the wrong people; facilitate the reporting of misconduct and effective responses to it; and foster a culture that rewards and values such actions.

The principles of humanity, neutrality, impartiality and independence are fundamental to humanitarian action.

- Humanity means that human suffering must be addressed wherever it is found, with particular attention to the most vulnerable.
- Neutrality means that humanitarian aid must not favor any side in an armed conflict or other dispute.
- Impartiality means that humanitarian aid must be provided solely on the basis of need, without discrimination.
- Independence means the autonomy of humanitarian objectives from political, economic, military or other objectives.

Adherence to these principles is essential, not only to demonstrate solidarity with all people facing situations of suffering and the destructive effects of crises, but also to ensure the proper delivery of humanitarian assistance and the protection of aid workers. If humanitarian organizations are not impartial, neutral and independent, and if the perception is created that they only come to the aid of the "opposing side", they are at increased risk of being attacked in situations of armed conflict or of being denied access to people who they need help. It is therefore essential to explain to all parties involved in a conflict that assistance is provided in full compliance with humanitarian principles.

Humanitarian work takes place in high-risk environments. In our activities we must ensure we understand the contexts in which we work, with continual analysis and monitoring of often fast-changing situations.

For each activity, we proactively identify risks and develop action plans to manage or mitigate them that must be adjusted as situations shift, new risks emerge, and our understanding of the environment increases. At the first stage of a response, risk analyses may not be able to be inclusive. Over time, a more diverse group of people and sources of information can be brought in, including refugees, displaced persons, elderly and disabled people; female-headed households; people from ethnic minorities; and refugees – all of whom may face specific risks that may not be apparent to others.

Good risk analysis draws on diverse sources of information – including national and international staff, partner organizations and community representatives; community or listening groups; feedback and complaints mechanisms; and colleagues from other agencies and structures. Involving diverse people and sources of information can bring useful perspectives about who is vulnerable to different kinds of risks, and the ways different people are affected.

In a rapid scale-up, it is often thought that there is a trade-off between saving lives and taking time to understand the context, but it is possible to start the risk analysis process in a simplified form very early on, perhaps through limited consultation with colleagues and partners. There is no point in ‘saving lives’ if we then put those lives at risk of harm. There is no finite list of the types of risks to consider – they vary by context and over time. However, it is important not to make a long list of every possible risk; instead prioritize those that are most harmful and most likely to occur:

- Sexual exploitation and abuse (this should always be included)
- Triggering violence, including violence against women, sexual assault or sexual violence
- Undermining humanitarian principles or normative standards, such as refugees’ right to non-refoulement, and safe, dignified, voluntary and sustainable return for internally displaced people
- Exacerbating tensions between groups, or within households/families
- Data management issues
- Discrimination
- Creating expectations that cannot be met

Safeguarding measures in humanitarian context need an organisation-wide approach. They can be separated into three areas: prevention, reporting and response.

Prevention

- ✓ Building a safe organisational culture
- ✓ Creating policies, procedures and a code of conduct
- ✓ Safeguarding risk management
- ✓ Safe recruitment
- ✓ Staff safeguarding training
- ✓ Designing and delivering safe programmes

Reporting

- ✓ Creating a system for all staff to report abuse, and for the organisation to respond
- ✓ Creating community-based complaints mechanisms so that anyone who interacts with the organization can report abuse or suspicions of abuse, and for the organisation to respond.

Response

- ✓ Providing immediate response to an incident of abuse
- ✓ Preparing for and managing investigations
- ✓ Delivering investigations where trained staff are in place.

Failure to address or respond to sexual exploitation and abuse will result in the failure of the organization's mandate and objectives of the programs being implemented in the humanitarian context. Many of these programs target vulnerable children and women in an effort to improve gender equality, reduce violence in communities and empower survivors to speak out. Incidents of abuse increase the suffering of an already vulnerable sector of the population and also undermines the credibility of these programs and staff. Beneficiaries of the organization's programs have the right to protection from abuse when participating in programs implemented for their benefit, and any form of abuse and exploitation undermines the positive impact of activities in communities.

In this regard, the organization will make every effort to work in a coordinated manner to increase staff awareness and understanding of abuse and exploitation, strengthen safeguarding policies, raise accountability and improve coordination and communication within the organization as well as with development partners.