POLICY FOR PREVENTION AND FIGHT AGAINST SEXUAL EXPLOITATION AND ABUSE (PSEA)

Last reviewed on 31/07/2026

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Preamble

In addition to the applicable contractual and legal documents, CartONG has policies and procedures that reflect its commitments to integrity:

- The Code of Conduct;
- The Policy for the Prevention and Management of Conflicts of Interest;
- The Policy for the Prevention and Fight against Fraud and Corruption;
- The Policy on the Prevention and Fight against Money Laundering and Terrorist Financing;
- An internal whistleblowing system.

These documents apply to all members of CartONG and allow everyone to have a common ethical framework.

This policy on preventing and combating sexual exploitation and abuse (PSEA) is part of this framework.

All these documents can be consulted on CartONG's internal computer network for its members and on CartONG's website for third parties.

1. Purpose of this policy

CartONG has a "zero tolerance" approach to sexual exploitation and abuse and does not allow any partner, supplier, contractor, employee, volunteer to engage in any form of sexual abuse or exploitation against children, vulnerable adults, or other adults associated with its work.

This policy focuses on the protection of adults and minors from sexual exploitation and abuse. This includes direct beneficiaries (its partners) or indirect beneficiaries (beneficiaries of its partners) of projects carried out by CartONG, adults and minors in the wider communities in which CartONG works and those who come into contact with CartONG or its representatives.

This Policy sets out the measures taken by the organization to prevent and, where appropriate, respond to sexual exploitation and abuse. This Policy sets out the commitments made by CartONG to ensure the protection of the people it works with and the application of effective sanctions in the event of problems.

2. Scope

This policy applies to all members of staff, employees, interns, civic services, consultants, board members, members and volunteers (hereinafter referred to as "members").

It also applies to all third parties (beneficiaries, partners, service providers, suppliers, etc.) associated with the performance of CartONG's work.

This policy applies at the head office as well as in all countries where CartONG is required to travel, regardless of local or national legislation, habits or practices, during and outside working hours, every day of the year.

3. Definition

Sexual exploitation is the act of abusing or attempting to abuse a state of vulnerability, unequal power relations or relationships of trust for sexual purposes, including but not limited to financial, social or political advantage.

Examples of sexual exploitation include, but are not limited to:

- Imposing sexual relations as a condition for the granting of assistance;
- Offer special benefits (including money, employment, goods or services) to recipients in exchange for expressed, implied or demanded sexual favours;
- Threats or insinuations that an individual's refusal or reluctance to accept sexual advances or demands will affect the person's right to assistance and support.

Sexual abuse is defined as any sexual assault committed by force, coercion or with the benefit of an unequal contribution, and the threat of such abuse also constitutes sexual abuse.

According to UN regulations, any sexual activity with a person under the age of 18 is considered sexual abuse, regardless of the age of majority or consent at the local level. Mistaken belief in a child's age is not a defence.

For the purposes of this policy, **terms of sexual exploitation and abuse may include,** but are not limited to:

- Sexual assault (defined as "any unwanted or forced sexual act that takes place without consent") or threat of sexual assault. Sexual assault occurs when the act is committed against a person's will, by force or coercion, or when a person is incapable of giving consent, for example, because of coercion or under the influence of drugs or alcohol. The force includes:
    - actual physical assault, including but not limited to rape, forced sodomy, forced oral intercourse, sexual assault with an object, assault of a sexual nature, forced fondling (e.g., touching or kissing someone against their will);
    - threats of physical assault;
    - emotional coercion and/or psychological blackmail.
- Unwanted touching.

- Demanding sex in any context
- Imposing a sexual relationship as a condition for the granting of assistance
- Forcing someone to have sex, or forcing them to have sex with a third party
- Forcing someone to engage in prostitution or pornography.
- Refuse safe sex practices.
- Recording or photographing sexual acts and broadcasting them without permission.
- Stating in legal documents that a person has a history of prostitution or threatening to do so.
- Addressing someone using sexual names.
- Emphasize things of a sexual nature, especially jokes that may make you feel uncomfortable, frightening, or hurt.
- Telling a person that they or a third party are obligated to have sex, making it a condition for getting something.

4. Fundamental principles and compliance with standards of protection against sexual exploitation and abuse

4.1. Fundamental principles

CartONG is committed to applying the six fundamental principles adopted in 2002 by the Inter-Agency Standing Committee (IASC) Ad Hoc Working Group on Protection from Sexual Exploitation and Abuse.

- Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for dismissal.
- Sexual activity with children (persons under 18 years of age) is prohibited, regardless of the age of majority or the age of consent at the local level. A mistaken belief about a child's age is not a defence.
- The exchange of money, employment, goods or services for sexual intercourse, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes conditioning aid, even though it is owed to the recipients, on sexual favours.
- Any sexual relationship between persons providing humanitarian assistance and protection and a person receiving such humanitarian assistance and protection that involves misuse of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- When a humanitarian worker develops concerns or suspicions about sexual abuse or exploitation committed by a colleague, whether or not they are in the same organization, they must raise these concerns through the reporting mechanism established by the association (see Article 6).
- Humanitarian workers are required to create and maintain an environment where sexual exploitation and abuse is not tolerated and to promote the implementation of their code of conduct. Managers at all levels have special responsibilities to support and develop systems that maintain this environment.

4.2. Compliance with standards of protection against sexual exploitation and abuse

The standards below apply to all CartONG members and associated third parties.

They define the rules of conduct required in personal and professional life, this list is not exhaustive.

All members and associated third parties of CartONG **MUST:**

- Treat all individuals with dignity and respect in all circumstances.
- Comply with the provisions, standards and commitments defined by this Policy.
- Participate in mandatory awareness training and other training related to this Policy.
- Report any problems or suspicions of violations of this Policy, following the alert mechanisms.

All members and associated third parties of CartONG **MUST NOT:**

- Engage in sexual intercourse, or ask for sexual services or favors from the beneficiaries (direct or indirect) of CartONG's projects, children or other individuals from the communities in which CartONG is required to work, in exchange for protection or assistance.
- Having sexual intercourse with a child, that is, with anyone under the age of 18. This prohibition applies regardless of the local age of consent, the local and national laws of the country in which the CartONG member or associated third party works and regardless of the age of consent in the home country of the member or associated third party. Ignorance or mistaken knowledge of the child's age is not a valid defence argument.
- Exchanging money, employment, goods or services for sex, including sexual favours or any other form of humiliating, degrading or exploitative behaviour. Sexual intercourse with sex workers is prohibited in all circumstances, regardless of the local or national laws, customs and practices relating to prostitution in the country.

5. Prevention & control

5.1. Communication

CartONG will put in place a communication plan to promote the dissemination and implementation of this policy and to raise awareness, throughout the Association, of the problem of sexual exploitation and abuse and its potential impacts.

The plan will include:

- The dissemination of the policy on the CartONG website and on the internal computer network.
- The presentation of all the documents constituting the common ethical framework, including this policy, to current members and associated third parties at the time of its publication and at the time of signing a contract or volunteer commitment for future members and associated third parties.
- Measures such as the addition of a clause on sexual exploitation and abuse and whistleblowing to the standard contractual agreements.

5.2. Control mechanism

CartONG staff responsible for recruiting, or directing other people employed by CartONG must be careful to prevent the hiring of individuals who have been the subject of a previous report for sexual exploitation and/or abuse. CartONG reserves the right not to hire a person if it has been brought to its attention by a professional or personal history that suggests that this person may represent an unacceptable risk to CartONG's staff or beneficiaries (direct and indirect).

The same vigilance will apply regarding the acceptance of new members and volunteers.

5.3. Training

As part of the prevention of sexual exploitation and abuse and awareness-raising, employees, interns, civic services and volunteers deployed on missions will have to follow and pass the training module dedicated to these issues.

This training will allow them to become aware of the ethical values mentioned in this policy, particularly for vulnerable situations. They will be informed of questionable situations, learn how to spot signs of sexual exploitation or abuse, and be given practical information on how to help victims, if signs are spotted or if a victim approaches them to complain.

6. Reporting mechanism

CartONG offers an internal whistleblowing system to report cases of sexual exploitation or abuse. This document explaining the mechanism is available on the CartONG website and on its internal computer network.

All CartONG members as well as associated third parties have an obligation to report any problems or suspicions of violations of this Policy. Especially at the address alerte@cartong.org.

This reporting obligation applies to any observation or suspicion of an offence involving other humanitarian workers, regardless of whether or not they work as a member or associated third party of CartONG.

In order to prevent sexual exploitation and abuse, it is the duty and responsibility of all members and associated third parties of CartONG to report any abuse, failure to do so represents a breach of this Policy and will be treated as serious misconduct, which may result in administrative or disciplinary sanctions.

CartONG will take action against any member or associated third party threatening or implementing retaliatory measures against the persons who have made a report or the persons in charge of their management and/or investigation.

In order to protect the persons involved, sensitive information related to cases of sexual exploitation and abuse will be treated confidentially and communicated only with discretion according to the necessary needs of information.

7. Penalties

Depending on the seriousness of the proven cases of sexual exploitation or abuse involving CartONG actors and third parties, and in addition to convictions handed down after legal proceedings when the matter has been referred to the national authorities, or other measures targeting the actors concerned, CartONG will apply the disciplinary measures provided for in the internal regulations and conditions of engagement, contracts, including, where applicable, immediate revocation or cessation of activities.

Disciplinary action will also be applied to members if they are found to have failed to report, encouraged or tolerated acts of sexual exploitation or abuse.

Malicious reporting of sexual exploitation or abuse without evidence or reasonable presumption, made with the intent to damage the integrity or reputation of a third party, constitutes misconduct and will be subject to disciplinary action. It should be distinguished from reports of alleged irregularities submitted in good faith and based on the belief and information available at the time of the report, which may not be confirmed by subsequent investigation.

8. Advertisement

This policy has been the subject of information and consultation with the Social and Economic Committee (CSE), in accordance with the legal provisions.

Each current member of the Association is made aware of the existence of this policy via electronic communication when it comes into force and updates, new members are informed during their onboarding briefing.

All current or newly recruited members of CartONG are required to read and declare that they have read this Policy and agree to abide by it. A document to this effect will be signed by each of the members in two copies, one kept by CartONG, the other for the signatory member.

Members are informed that this document may be given to the association's donors who request it.

9. Effective date

This policy on preventing and combating sexual exploitation and abuse (PSEA) will come into force on September 1, 2026.

Done in Chambéry on 31/07/2026

Signature of Sophie Oddo, as Co-Director of CartONG



Signé électroniquement par
Sophie Oddo
Le 31/07/2026 à 14:32