

APPROVED
by the Senior Management Team
(minutes No 25 dated 14 July 2025)

Protection from Sexual Exploitation, Abuse and Harassment Policy

1. Policy objective

1.1. The objective of this Policy is to:

- promulgate the policy of zero tolerance for sexual exploitation, abuse and harassment (SEAH) for all members of governing bodies, employees, including interns (hereafter together – employees), volunteers, consultants, partners, and contractors of the International Charitable Foundation ‘Alliance for Public Health’ (hereafter — the Alliance);
- ensure that roles, responsibilities and expected standards of conduct in relation to SEAH are known within the Alliance;
- create and maintain a safe environment, free from SEAH, by taking appropriate measures for this purpose, both internally and with regard to the Alliance’s partners, as well as in the communities where the Alliance operates, through robust prevention and response work to prevent and respond to SEAH.

2. Policy statement

2.1. SEAH violate universally recognised international legal norms and standards. Everyone has equal rights to protection from SEAH regardless of their race, gender, age, religion or disability, sexual orientation, social background or culture.

2.2. SEAH are unacceptable behaviours and prohibited conduct for all members of governing bodies, employees, consultants and volunteers of the Alliance.

2.3. The Alliance has a policy of zero tolerance towards SEAH. All members of governing bodies, employees, consultants and volunteers of the Alliance are expected to uphold the highest standards of personal and professional conduct at all times, and to provide assistance and services in a manner that respects and fosters the rights of their beneficiaries and other vulnerable members of local communities.

3. Scope and procedure of application

3.1. This Policy sets out the Alliance’s approach to prevent and respond to SEAH.

3.2. This Policy applies to all employees, consultants and volunteers of the Alliance, both on- and off-duty.

3.3. Implementation of this Policy is the responsibility of all employees, consultants and volunteers of the Alliance who familiarised themselves with its provisions and signed the appropriate consent to comply with such provisions. Familiarisation and consent to comply with the provisions of this Policy are certified with a signature on the appropriate consent form (Annex 1 to this Policy). The mentioned consent form also concerns the compliance with the provisions of the Alliance’s Code of Ethics regarding protection from SEAH.

3.4. The authorised person for protection from SEAH (hereafter - the Authorised Person) appointed by the Alliance Executive Director coordinates and is responsible for the implementation of this Policy. Unless such Authorised Person is appointed by a separate decision of the Executive Director, Advisor: Internal Audit, Risk Management (and Compliance) of the Alliance should be considered to be the Authorised Person by default. Duties of the Authorised Person are defined in Annex 2 to this Policy.

3.5 In relation to SEAH for children, this Policy is complementary to the Children Protection Policy of the Alliance (Annex_15-C6, Section 6 of the Alliance Staff Manual) and applies in conjunction with the Children Protection Policy.

4. Definitions

4.1. For the purposes of the present Policy, the term '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 another person, e.g. through recruiting or coercing them to engage in sex work, producing and/or disseminating pornography, sex trafficking and profiteering from it, etc.

4.2. Similarly, the term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature (vaginal, anal or oral sexual intrusion in another's body using any body part or object), whether by force or under unequal or coercive conditions, including any sexual acts involving an adult without his/her consent or a child irrespective of his/her consent, or in presence of a child, forcing to a sexual act with a third person, online abuse and other violations of sexual freedom or sexual immunity as per the current legislation of Ukraine, incl. those committed against a child or in the presence of a child.

4.3. The term 'sexual harassment' means any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation. Sexual harassment may involve any conduct of verbal (threats, bullying, obscene comments, etc.), nonverbal (sending obscene images, records, etc.) or physical (touching, patting, etc.) nature, including written and electronic communications, and may occur between persons of the same or different genders.

4.4. For the purposes of the present Policy, the term 'partners of the Alliance' shall mean subrecipients and sub-subrecipients of Alliance's aid – legal entities, including their employees, volunteers and consultants.

4.5. For the purposes of the present Policy, the term 'contractors of the Alliance' means legal entities and private entrepreneurs that supply goods (works, services) to the Alliance, are not consultants of the Alliance and at the same time contact or may contact representatives of communities (key population groups), for which the Alliance carries out its activities, within the framework of such supply.

4.6 For the purposes of the present Policy, the term 'perpetrator' shall mean any individual having committed any form of SEAH.

4.7. For the purposes of the present Policy, the term 'victim/survivor' shall mean any natural person affected by any form of SEAH. The person involved should have the choice of which term to use with regard to him/her.

5. Commitment to PSEAH

5.1. The Alliance will make every effort to create and maintain a safe environment, free from SEAH, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEAH framework, including prevention and response measures.

5.2. This Policy affirms commitment of the Alliance to the UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core Principles relating to protection from sexual exploitation and abuse.

6. The core principles

6.1. SEAH by employees, consultants and volunteers of the Alliance constitute acts of gross misconduct or violation of civil law contract, and are therefore grounds for the strictest disciplinary measures as per applicable laws of Ukraine, or for termination of the civil law contract.

6.2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent established by local legislation. Mistaken belief regarding the age of a child is not a defence.

6.3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance or services that are due to beneficiaries.

6.4. Any sexual relationship between employees, consultants and volunteers of the Alliance and beneficiaries of assistance or other vulnerable members of the community that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of assistance and services provided by the Alliance.

6.5. Where an Alliance employee, consultant or volunteer develops concerns or suspicions regarding SEAH by a fellow employee, partner or contractor of the Alliance, whether within the Alliance or not, he or she must report such concerns following a procedure established herein, providing all the information they have.

6.6. All employees, consultants and volunteers of the Alliance must not abuse their position and are obliged to promote and maintain an environment which prevents SEAH and promotes implementation of this Policy. Managers at all levels have particular responsibilities to support and develop systems maintaining this environment.

6.7. When responding to cases of SEAH, the Alliance shall act in a manner that prioritises listening to survivors of SEAH, avoids re-traumatisation, and systematically focuses on their safety, rights, well-being, expressed needs, and choices. This victim-centred approach seeks to empower the survivor, giving them back as much control as possible, and ensuring an empathetic, respectful and individualised response in a non-judgmental manner.

7. PSEAH framework

Considering that prevention is an integral part of this Policy, the Alliance approaches responsibly the issues of selection of employees, volunteers and consultants, and takes measures to inform and train such employees, volunteers and consultants.

7.1. Prevention

7.1.1. Vetting:

Any job posting or announcement on selection of consultants or volunteers includes the following:

The Alliance applies zero tolerance policy with regard to sexual exploitation, abuse or harassment and related abuse of power or authority. It is expected that all selected candidates will adhere to the highest ethical standards and will undergo rigorous reference and background checks.

Alliance employee selection process includes:

- probing the ethical behaviour of the employee in reference checks. For this purpose, the form given in Annex 3 to this Policy may be used;
- checking any gaps or inconsistencies in the CV or other data about the candidate;

- interviewing the candidate on issues sensitive to protection from SEAH, as well as completion of a self-declaration confirming the candidate has never been subject to disciplinary, administrative or criminal sanctions arising from an investigation in relation to SEAH or related abuse of power, or left employment pending investigation and refused to cooperate in such an investigation. For this purpose, the list of questions given in Annex 4 to this Policy, as well as the forms given in Annexes 5 and 6 to this Policy, may be used.

7.1.2. Onboarding and training: The Alliance familiarises all of its employees, consultants, volunteers, contractors and partners with this Policy, including through posting this Policy on its website; conducts mandatory initial and periodic training for all employees, consultants and volunteers on this Policy and related procedures.

In particular, employees of the Alliance must sign and indicate their understanding and compliance with this Policy in labour contract and respective order.

Contracts with consultants and volunteers of the Alliance contain the following provision (names of the parties are subject to change depending on the type of the contract):

The Customer has zero tolerance for any sexual exploitation, abuse and harassment (SEAH) of any person. By signing this contract, the Contractor confirms having read, understood and undertakes to comply with Customer's Policy of Protection from SEAH (hereafter — the Policy). The Customer reserves the right to unilaterally terminate this Contract in case of substantiated allegations of SEAH conducted by the Contractor, or other violations of the Policy regardless of when they were committed, at any time, by sending a written notification of termination to the Contractor.

Training of employees regarding this Policy application is carried out during the onboarding, as well as annually. The Alliance may use existing certified programs offered by UN agencies and recognized international organisations, such as the United Nations Children's Fund (UNICEF), as trainings on protection from SEAH.

7.1.3. Safe programming: Responsible programming is a priority for the Alliance, so it will seek and support its partners as well as communities touched by the Alliance's activity to evolve our programmes to prevent and promptly address SEAH therein, including relevant risks assessment and sharing relevant information with the communities. To assess relevant risks, the personnel may use the mechanisms and forms envisaged in the Risk Management Policy (Annex 7_C4 to the Alliance Staff Manual).

7.2. Response

7.2.1. Reporting: Employees, consultants, volunteers, partners, contractors, end beneficiaries of assistance and communities, including children, can safely and confidentially report SEAH to the Authorised Person. Such notifications are performed in accordance with the Procedure for reporting incidents and allegations of SEAH cases (Annex 7 to this Policy). The Alliance communicates relevant contact data to employees, consultants, volunteers, partners of the Alliance, members of the relevant communities.

The Alliance holds whistle-blowers safe from any prosecution by other employees, volunteers, consultants and partners of the Alliance in relation to the report of SEAH. An employee who retaliates against a whistle-blower who reported the violation in good faith is subject to disciplinary action up to termination of employment. Relevant provisions on the protection of whistle-blowers are regulated by the Whistle-Blowing Policy: reporting concerns about professional practice (Annex_5-P4 to Chapter 4 of the Alliance Staff Manual).

The Alliance also notifies the donor if this is required by the donor agreement, in the manner defined by the Procedure for reporting incidents and allegations of SEAH cases (Annex 7 to this Policy).

7.2.2. Investigation: The Alliance, unless otherwise specified by the donor, shall without delay make retain the services of a third party or parties, who can conduct an independent investigation of SEAH by its employees. The procedure for consideration and investigation of SEAH cases is given in Annex 8 to this Policy.

7.2.3 Providing assistance to the survivors: Authorised Person, within the range of its competence, shall provide a survivor with necessary support in the form of information on available resources on safety, psychological, legal, medical and other necessary assistance. The Alliance also assists survivors of SEAH in timely receiving of necessary assistance, including ensuring their protection and safety, receiving health, psychosocial and legal support, material aid, in particular by promptly referring SEAH survivors to available services based on their needs and subject to their consent. The procedure and form for referring are given in Annex 13 to this Policy. A list of organisations for referring is provided in Annex 14 to this Policy.

7.3. Collaboration activities

7.3.1. The Alliance ensures its partners are familiar with this Policy and demands that they apply zero tolerance policy to SEAH and take actions to prevent and respond to SEAH, including developing and adopting its own policy on protection from SEAH.

The Alliance ensures periodic checks of partners' abiding by the policies and procedures within the framework of its own recipient control, monitoring and evaluation system.

7.3.2. Contracts with partners and contractors of the Alliance shall contain the following provision (names of the parties and particular wording may change depending on the type of the contract, without affecting the main obligations under this provision):

The Customer has zero tolerance for any sexual exploitation, abuse and harassment (SEAH) of any person. By signing this contract, the Contractor confirms having read, understood and undertaken to comply with Customer's Policy of Protection from SEAH, which is posted on the Organisation's website at <https://aph.org.ua/uk/tendery/polityky-i-protsedury/> (hereafter — the Policy), as well as making its employees, consultants, contractors and volunteers read and comply with the Policy. If the investigation substantiates the evidence that SEAH have occurred, ongoing work with the Contractor cannot involve the individual(s) concerned. The Customer reserves the right to unilaterally terminate this Contract at any time, by sending a written notification of termination to the Contractor, if there is reason to believe that the Contractor committed SEAH or an allegation has been dealt with by the Contractor inappropriately, regardless of when SEAH were committed.

7.3.3. Failure of these legal entities or natural persons to take measures to prevent SEAH, investigate allegations of SEAH and take corrective actions in case of SEAH shall constitute the grounds for termination of any legal act (agreement, contract) with the partner or contractor.

8. Revision of the Policy

This Policy, as well as processes and systems related to protection from SEAH, are subject to regular review by the Authorised Person, at least once a year. In case of need the Authorised Person may raise a question about making changes to this Policy, relevant processes and systems.

Annexes:

- Annex 1 – Form of consent to comply with the Code of Ethics and Policy of the employee/consultant of the Alliance
- Annex 2 – Duties of the Authorised Person
- Annex 3 – Feedback form about the candidate from the previous employer
- Annex 4 – Interview questions for the candidate
- Annex 5 – Questionnaire of a candidate to fill a vacant position/ to provide services
- Annex 6 – Self-declaration form of a candidate for the position of an employee / service provider under a civil law contract in the Alliance regarding the absence of SEAH cases in the past
- Annex 7 – Procedure for reporting incidents and allegations of SEAH cases
- Annex 8 – Procedure for consideration and investigation of SEAH cases
- Annex 9 – Internal report about the incidence of sexual exploitation, abuse or harassment
- Annex 10 – Form for documenting an incident with accusations of sexual exploitation, exposure or harassment
- Annex 11 – Consent to participate in the investigation of the SEAH case
- Annex 12 – Statement on compliance with the confidentiality of persons who are not participants in the investigation or investigators
- Annex 13 – Procedure and form for referring a survivor of SEAH to receive services
- Annex 14 - List of contacts for referring survivors of SEAH

Form of consent
to comply with the Code of Ethics and the Protection from Sexual Exploitation, Abuse
and Harassment Policy in the ICF 'Alliance for Public Health' (hereafter - the Alliance) of
an employee/consultant of the Alliance

I, _____, confirm with my signature that I have carefully read the provisions of the Code of Ethics of the Alliance (hereafter – the Code) regarding protection from sexual exploitation, abuse and harassment and the Protection from Sexual Exploitation, Abuse and Harassment Policy of the Alliance (hereafter – the Policy), have understood all principles and requirements, and I confirm my commitment to the policy of zero tolerance for sexual exploitation, abuse and harassment (hereafter - SEAH) and readiness to act in full compliance with the requirements of the Code and the Policy while working for the Alliance / engaging in the activities of the Alliance.

In particular, I undertake to:

- adhere to the principles of the Code and the Policy;
- adhere to appropriate standards of conduct, make efforts to prevent SEAH in relation to the beneficiaries of the Alliance's assistance;
- take an active part in training and activities aimed at raising awareness about SEAH, including providing support for the distribution of materials on protection from SEAH;
- inform about allegations of SEAH through special channels;
- if necessary, participate in investigations of allegations of SEAH;
- identify and mitigate/avoid programmatic risks in the field of SEAH.

I also guarantee by signing this form the truthfulness of the data I provided during the hiring / selection for cooperation with the Alliance regarding the absence of any cases of SEAH in the past where I acted as a perpetrator.

I am aware of the full extent of responsibility for violating the provisions of the Code and the Policy, including disciplinary, administrative and criminal responsibility, in accordance with the current legislation of Ukraine.

I had the opportunity to ask all questions regarding the provisions of the Code and the Policy and receive comprehensive answers from the Authorised Person before signing this Form.

Full name and position of employee/consultant: _____

Signature: _____

Date: _____

Duties of the Authorised Person

The person responsible for the implementation of the Policy must perform the following duties within his/her working hours:

1. Familiarise employees, consultants and volunteers of the Alliance with the Policy.
2. Coordinate work on the prevention of SEAH cases within the Alliance's activities.
3. Coordinate work on responding to reports of SEAH cases detected within the scope of the Alliance's activities.
4. Monitor the implementation of the Policy.
5. Coordinate information activities with partners and other third parties regarding the requirements of the Policy within the Alliance's activities.
6. Notify the management about problems or difficulties in the implementation of the Policy.

Feedback form about the candidate from the previous employer

The Alliance conducts this review to promote a zero-tolerance for SEAH for all Alliance employees, to create and maintain a safe SEAH-free environment, and to improve the prevention of any form of abuse.

Your name:

Name of your organisation and position:

Email address and phone:

Full name of the candidate:

Your business position in relation to the candidate (manager, colleague, business partner, consultant):

How long have you worked with the candidate and in which organisation?

We appreciate your honest feedback. Please answer the questions briefly. If possible, please provide specific examples.

1. Briefly describe the main job duties of the candidate when you worked with him: Your answer
2. Describe what achievements and/or contributions the candidate made to your company. Your answer
3. Has he/she been in an environment where he/she has had the opportunity to work with team members and partners from different cultures, languages, perspectives, etc.? Describe her/his ability to communicate with others. Your answer
4. In your opinion, what professional skills and competencies of the candidate need to be worked on? How do you see him/her trying to improve them? Your answer
5. Do you have any concerns about this candidate's ability to maintain a safe work environment without causing SEAH? Your answer
6. Do you know of any cases where the candidate violated the rules and internal policies of the company? If so, what violations were committed? Your answer
7. Do you have any additional comments or warnings about the candidate's work or ethical conduct? Your answer
8. Would you hire him/her again? Your answer

Interview questions for the candidate

- How do you imagine ethical behaviour in the organisation? Tell us about a situation when you faced an ethical challenge.
- The Alliance's Policy and/or Code of Ethics on protection from SEAH applies to all employees, both on and off the job. Do you have any problems with this?
- Tell us about a situation when you witnessed or became aware of an abuse of power in your workplace/work context. What actions, if any, did you take? What did you learn?
- Some of the people we work for may be more vulnerable to SEAH. Which groups or individuals do you think are most at risk as part of our organisation's work?
- Have you ever known of a situation where one of your colleagues was involved in misconduct or violation of your organisation's Code of Conduct/Safeguarding Policy at your current or previous organisation? If so, please describe the actions you took in response to this situation.
- What would be your contribution to providing a safe work environment and culture where SEAH is tolerated?
- What contribution would you make to ensure that your teammates adhere to the highest standards of behaviour to reject any form of sexual misconduct?
- Consider the following scenario: One of your team members, [selected name 1], tells you confidentially that another team member, [selected name 2], misbehaved with some beneficiaries, apparently women. However, [selected name 1] advises you not to do anything, as he fears that it will damage the working relationship within the team if [selected name 2] finds out that he reported this situation. What would you do? Who else should be involved?
- Have you been the subject of an investigation for misconduct or violation of the rules/code of conduct of your current/previous organisation?

Questionnaire of a candidate to fill a vacant position

1. Surname		2. First name	3. Patronymic
4. Date of birth day month year	5. Place of birth	6. Gender • Male • Female	7. Registration address
8. Have you ever been convicted, fined or imprisoned for breaking any law (except minor traffic violations)? <ul style="list-style-type: none"> • No • Yes If "Yes", provide full details of each case <hr/> <hr/> <hr/> <hr/> <hr/>			
9. Have you ever been subject to disciplinary action, including dismissal or suspension, for misconduct? <ul style="list-style-type: none"> • No • Yes If "Yes", provide full details of each case <hr/> <hr/> <hr/> <hr/> <hr/>			
10. Have you ever been dismissed from work based on unsatisfactory performance of job duties? <ul style="list-style-type: none"> • No • Yes If "Yes", provide full details of each case <hr/> <hr/> <hr/> <hr/> <hr/>			
11. Have you ever committed sexual exploitation, abuse, or been prosecuted (including criminally), or found guilty of such a crime? <ul style="list-style-type: none"> • No • Yes If "Yes", provide full details of each case <hr/> <hr/> <hr/> <hr/> <hr/>			
Case outcome: negative conclusion <input type="checkbox"/> , convicted <input type="checkbox"/> , pardoned <input type="checkbox"/> , acquitted <input type="checkbox"/> , pending <input type="checkbox"/> , other <input type="checkbox"/> .			

12. I certify that the statements made by me in response to the above questions are true, complete and correct to the best of my knowledge and belief. I understand that any false information or material omission made in the questionnaire may lead to termination of cooperation with me.

Date __.__.____

_____. (_____)

**Self-declaration form
of a candidate for the position of an employee / service provider under a civil law
contract in the ICF 'Alliance for Public Health' (hereafter - the Alliance) regarding
absence in his/her past the cases of sexual exploitation, abuse and harassment
(hereafter – SEAH)**

I, full name: _____,
was informed by the representative of the Alliance about the policy of zero tolerance to SEAH for
all employees / service providers under the contract of a civil law nature of the Alliance.

At the same time, I understand that:

- the term '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 another person, e.g. through recruiting or coercing them to engage in sex work, producing and/or disseminating pornography, sex trafficking and profiteering from it, etc.

- the term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature (vaginal, anal or oral sexual intrusion in another's body using any body part or object), whether by force or under unequal or coercive conditions, including any sexual acts involving an adult without his/her consent or a child irrespective of his/her consent, or in presence of a child, forcing to a sexual act with a third person, online abuse and other violations of sexual freedom or sexual immunity as per the current legislation of Ukraine, incl. those committed against a child or in the presence of a child.

- the term 'sexual harassment' is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation. Sexual harassment may involve any conduct of verbal (threats, bullying, obscene comments, etc.), nonverbal (sending obscene images, records, etc.) or physical (touching, patting, etc.) nature, including written and electronic communications, and may occur between persons of the same or different genders.

By signing below I confirm that I have not been subject to disciplinary, administrative or criminal action for any violations related to the SEAH, and that I did not quit the job / terminate services pending an investigation by the SEAH and did not refuse to cooperate with such an investigation.

I am aware of the full extent of responsibility for my provision of false information, including disciplinary, administrative and criminal responsibility, in accordance with the current legislation of Ukraine.

I have had the opportunity to ask all the questions about this Form and get comprehensive answers from the representative of the Alliance before signing this Form.

Signature: _____

Date: _____

Procedure for reporting incidents and allegations of SEAH cases

1. A SEAH incident or allegation may be reported by employees, consultants, volunteers, end beneficiaries of assistance, partners, contractors or any other survivors of SEAH, including children and persons with disabilities, or witnesses to the incident.
2. In the event of incidents or allegations of committing SEAH, the relevant person immediately, in an arbitrary form or in the form of a statement, notifies the Authorised Person in person or by e-mail, if desired anonymously, at the dedicated e-mail address porada@aph.org.ua or through other secure communication channels.
3. The reporting by the employee must be made within 24 hours from the moment he/she became aware of the incident, be detailed and include information about the facts or allegations regarding the SEAH case, information about the survivor, about the perpetrator, and witnesses. In this case, the reporting form specified in Annex 9 to the Policy may be used.
4. All cases and/or allegations of SEAH, including anonymous ones, are considered individually and confidentially, in accordance with the Policy.
5. The Alliance creates, supports and disseminates information about the availability of channels for receiving reports: a written complaint to the address of the Alliance (Kyiv, 24 Bulvarno-Kudryavska Street), phone: +380444905485, e-mail address porada@aph.org.ua.
6. The Authorised Person constantly checks the presence of reports and records all received reports, including anonymous ones, in a separate log or file.
7. The log is a document of strict reporting, and with all investigation documents, it is kept in the safe of the Alliance. The relevant file must be protected by a password known only to the Authorised Person and the Executive Director of the Alliance.
8. In case of detection of the fact of SEAH, the Authorised Person or the Executive Director of the Alliance, if required by the donor, must ensure immediate (but no later than within 24 hours from the moment he/she learned about the incident) notification of the incident of such a donor through the channels specified by the latter. In particular, the Global Fund to Fight AIDS, Tuberculosis and Malaria, relevant UN agencies should be notified in this manner. The Alliance will also keep the donor informed during the investigation, without prejudice to the due process rights of any persons involved. Upon completion of the investigation, the Alliance will also promptly report the results of the investigation and, upon request, share any relevant details and evidence for the donor's review and further use, to the extent legally possible.
9. The Authorised Person is responsible for providing feedback to the whistle-blower / survivor regarding the acceptance and consideration of the relevant report.

Procedure for consideration and investigation of SEAH cases

The procedure is used to consider internal, external, anonymous reports according to a single algorithm, namely:

1. No later than 72 hours from the moment of receiving a report (notification) about an incident or allegation, the Authorised Person must consider the report and contact the whistle-blower to confirm receipt of the complaint.
2. Within 72 hours after confirmation of the fact of receiving a report about SEAH, the information is evaluated, taking into account an individual, confidential approach to the needs of the survivor. Necessary qualified specialists may be involved in providing assistance to the survivor.
3. The Authorised Person must refer suspicious and substantiated cases of SEAH and cases involving minor children and vulnerable adults, in accordance with the legislation of Ukraine.
4. The Authorised Person documents the SEAH case in accordance with the requirements specified in Annex 10 to the Policy, performs an initial evaluation of the report and submits its results to the Executive Director of the Alliance.
5. If the donor, after the appropriate notification of the incident, has not decided to conduct its own investigation and exclude the Alliance from such an investigation, the Executive Director of the Alliance, if necessary, may initiate an investigation of the case for further consideration of the received report of the SEAH case. In such a case, the Alliance shall without delay engage the services of a third party(ies) which may conduct an independent investigation of SEAH (a law firm, etc.) (hereafter – the Third Party).
6. The Third Party will be responsible for the following:
 - Investigation planning;
 - Assessing risks and responding to them as part of the investigation, including identifying immediate risks to the safety of the survivor or others involved and recommending possible temporary measures to mitigate such risks, if there are reasons for this (e.g. transfer, suspension, change of duties to prevent contact between such a person and the perpetrator), as well as recommending and/or implementing measures that may be necessary to preserve evidence;
 - Collection and preservation of evidence, including interviewing relevant persons and obtaining written testimonies;
 - Drawing up conclusions based on the results of the investigation and providing a report on the investigation to the Alliance;
 - Timely notification of law enforcement and other competent state authorities in the event of such a need arising within the framework of the investigation;
 - Maintaining confidentiality at all stages of the investigation, including determining who should have access and to what type of information, appropriate coordination of information sharing to help protect participants and the integrity of the process, and having a secure information management system for storing electronic and non-electronic data, access to which is restricted to persons directly involved in the conduct or supervision of the investigation (for example, using password protection of computers and storing them in a secure location; storing paper documents and other evidence in locked cabinets in a secure room; avoiding use of any identifying information in written communications such as emails, WhatsApp messages and others). The persons involved in the interview sign an informed consent to participate in the investigation (the form is given in Annex 11 to the Policy). The personal data of persons who make a report and are involved in the investigation are treated as strictly confidential. All persons involved in the consideration of the report sign a form on non-disclosure of details that may harm the survivor (the relevant forms are given in Annexes 11 and 12 to the Policy);
 - Ensuring that a victim-centred approach is followed throughout the investigation, including prioritizing the welfare, protection and safety of the survivor, offering support during interviews, explaining to the survivor all procedures, consent requirements, etc., enabling the survivor to understand how the investigation may affect him/her.
7. The investigation may last up to three months from the moment when the fact of SEAH became known and is coordinated by the Alliance's Authorised Person.

8. The conclusions of the investigation are considered by the Executive Director of the Alliance, who makes a decision on applying necessary sanctions, guided by the Policy and objectively and impartially considering all available facts. According to the conclusions of the investigation, one of the following decisions may be made:

- If the report is not substantiated and the violation of the Policy is not confirmed, no action is taken.
- If the findings of the investigation indicate evidence of violations of the Policy, or if the perpetrator himself admits guilt, the employee will be subject to the most severe disciplinary measures provided for by applicable law, and the contract with the consultant or volunteer will be terminated.
- If the findings refer to confirmed cases of SEAH with members of the Alliance's governing bodies, the issue of termination of the relevant person's membership is submitted to the relevant governing body.
- If the findings of the investigation indicate evidence that a SEAH incident has occurred, the collaboration with the partner or the contractor may not include the individual(s) concerned. If there is a reason to believe that the partner or the contractor has responded inappropriately to a SEAH report, funding of it or cooperation with it may be terminated.
- If confirmed cases concern donors, benefactors, patrons, volunteers and other individuals, cooperation with them is terminated.
- If the report contains signs of a criminal offense and if this has not been done before, it is sent to the appropriate law enforcement agencies, regardless of the conclusions of the internal investigation, but subject to the informed consent of the adult survivor.
- If the report concerns a child, children's services and law enforcement agencies are notified immediately within 24 hours, regardless of the results of the internal investigation.

9. The Authorised Person must inform the whistle-blower, the perpetrator and the survivor about the relevant decision.

10. Regardless of the decision taken in accordance with paragraph 8 above, the Executive Director may also take any other necessary decisions aimed at correcting the situation with the SEAH protection system in the Alliance and preventing the recurrence of relevant incidents in the future, including additional training of personnel on relevant issues, further strengthening of capacity and mechanisms in the area of risk assessment, other areas, etc.

11. The Authorised Person provides the survivor with access to assistance immediately after receiving the report or within 24 hours from the moment of receiving the report or notification, based on his/her needs and wishes, regardless of the Alliance's decision to investigate the case and regardless of the status/result of the investigation. In order to access services, the survivor is not required to participate in the investigation, identify the perpetrator, or prove that the complaint is true. Where appropriate, the Alliance should also consider the needs in protection and support of witnesses, complainers and others related to the case (e.g. whistleblowers) in accordance with the UN Protocol on the Provision of Assistance to Victims of SEA. The survivor has the right to receive information about the progress of the investigation.

12. In case of a partner's or contractor's inability or unwillingness to conduct their own investigation into a SEAH incident, of which the Alliance became aware, the Executive Director, upon the recommendation of the Authorised Person, may decide that the Alliance will respond in the manner stipulated in paragraphs 1-11 above.

13. Privacy

13.1. Personal data of persons who report and/or are involved in the investigation are treated by the Alliance as strictly confidential.

13.2. All participants in the investigation and other persons involved in the review of the report must adhere to the principle of confidentiality throughout the process of submitting and reviewing the report, as well as thereafter. All persons involved in the investigation sign an appropriate statement on compliance with confidentiality (relevant forms are given in Annexes 11 and 12 of the Policy). In case of breach of confidentiality, such persons will be subject to disciplinary or contractual penalties, or other liability measures in accordance with the legislation of Ukraine.

13.3. The Third Party's confidentiality obligations are set forth in the Alliance's contract with such a person.

**Internal report about the incidence of sexual exploitation, abuse or harassment
(hereafter – SEAH)**

Reason for the report:

- ☐ I became a witness to SEAH
- ☐ I suspect that a person is involved in SEAH
- ☐ I became a victim of SEAH

Please, indicate the facts, which confirm your concern. If possible, please indicate the date, hour, place and setting:

--

If you have become a victim of SEAH, what emergency assistance do you need:

- ☐ I need medical assistance.
- ☐ I need psychological support and rehabilitation.
- ☐ I am looking for legal assistance to bring the guilty person to justice.
- ☐ I need financial assistance to cope with the consequences of SEAH.

Other (specify):

--

Personal data of the suspect:

Full name	
Place of work and position	
Contact information (if available)	

Personal data of the victim:

Full name	
Place of work and position	
Contact information (if available)	

Personal data of witnesses of the situation:

Full name	
Place of work and position	
Contact information (if available)	

Date _____ Signature _____

The Alliance undertakes to keep the personal data of the author of the report confidential.

Form for documenting an incident with accusations of SEAH

CONFIDENTIALLY:

access to this document is restricted and it is kept separately from other documents related to the SEAH incident.

1. Detailed information about how, when and by whom the accusation was received:
2. Description of the alleged incident, including dates, time and place:
3. Description of alleged or expected victims (for example, full name, age, gender):
4. Description of alleged or suspected perpetrators (for example, full name, age, gender, organizational affiliation / position, previous records of wrongdoing):
5. Activities undertaken by the Alliance in response to allegations received to date (e.g. referrals for assistance, investigations, third party notifications):
6. Activities carried out by other organizations or structures in response to this accusation:
7. Requested assistance from partner organizations (for example, providing assistance to SEAH victims, support during investigations):
8. Information about the persons to whom this report was sent (full name, position, contact information (e-mail, phone), date)

The report was prepared by:

Full name _____

Position _____

Date _____

Consent to participate in the investigation of the SEAH case

You have been asked to assist in the investigation of an allegation of sexual exploitation, abuse or harassment (hereafter – SEAH), which is being conducted at the request of the ICF 'Alliance for Public Health' (hereafter - the Alliance). You may be asked to be interviewed, provide documents, computer files and other records, or be asked to provide assistance in any other way. Investigation is a key element of the Alliance's commitment to preventing and responding to SEAH incidents.

As a participant in the investigation, you must know and agree to the following:

Cooperation. You are encouraged to cooperate with the investigation and to answer all questions and requests of the relevant investigators honestly and fully.

Compliance with confidentiality. You must keep confidential the fact that an investigation is underway and anything that was discussed with you as part of the investigation, as well as any details of such discussion.

Refusal of retaliate. The Alliance does not condone any threats or retaliation against anyone who reports a violation or cooperates with an investigation.

Abandoning your investigation. Do not attempt to conduct your own investigation or question witnesses, as this may disrupt the course of the investigation.

Creation of favorable conditions. Never try to interfere or obstruct the investigation.

Compliance with these requirements is mandatory. Violations may result in severe disciplinary action and referral to law enforcement. Thank you very much for your help in the investigation. If you become aware or remember anything else that may be relevant to the investigation, or if you have any questions, please contact us.

Full name and contact details of the investigator:

Signature of the investigator:

I agree to participate in the investigation and comply with the conditions of such investigation specified in this consent:

Full name and signature of the investigation participant:

Statement on compliance with the confidentiality of persons who are not participants in the investigation or investigators

Purpose: Confidentiality is an important component of the victim-centred principle in SEAH investigations and ensures that information collected during the investigation is only disclosed to authorised persons on a need-to-know basis. Therefore, this Confidentiality Statement applies to all interpreters/translators, representatives of the survivor, persons providing support, and all persons who are not part of the investigation or investigator.

How to use this document: Interpreters/translators, representatives of the survivor, persons providing support, and any other person who is not a participant in the investigation or the an investigator must read and sign the Confidentiality Statement in the presence of the investigator before participating in the interviews, sessions or information exchange. The investigator also signs a Confidentiality Statement, ensuring that it is properly filed and stored with other investigative documentation. If the investigation is conducted remotely, ideally the statement should be signed in the presence of a member of the local investigation team. If this is not possible, the statement must be signed via video conference in the presence of the investigator.

Confidentiality Statement

I, the undersigned _____, undertake to exercise the utmost caution regarding my participation in the investigation, which is being conducted at the request of the ICF 'Alliance for Public Health'.

I undertake to maintain the confidentiality of all information that has become known to me as a result of my activities within the framework of the specified investigation. I will not use such information for personal gain, nor for the benefit or detriment of third parties. I understand that this statement will remain in effect after my investigative assignment is complete. I also understand that disclosure of confidential information to persons not authorised to receive it may constitute misconduct and that a signed original of this statement will be kept in the appropriate file of the investigation.

Surname and first name: _____

Position: _____

Signature: _____

Date and place _____

Full name and contact details of the investigator:

Signature of the investigator:

Procedures and form for referring a survivor of SEAH to receive services

1. If a survivor of SEAH needs professional medical, psychological, legal, financial, informational or other assistance, or wants to receive this assistance outside the Alliance, it is necessary to refer him/her to the relevant organizations and institutions, or provide the survivor with a list of their contacts. The referral process by the Alliance is coordinated by the Authorised Person.

2. All SEAH referrals should be made in accordance with a victim-centred approach and the following guidelines for responding to gender-based violence:

- **Safety:** the safety of the survivor and others, such as her/his children and caregivers, should be the highest priority when making a referral;
- **Privacy:** people have the right to choose who they tell or withhold their story. Maintaining confidentiality means not disclosing any information to any party without the informed consent of the individual concerned. Privacy strengthens security, increases trust, and promotes empowerment. Typically, a survivor referral requires some key information to be provided, but the survivor has the right to decide how much information to provide, to whom, and for what purpose.
- **Non-discrimination:** the treatment of survivors of abuse should be equal and fair, regardless of their previous experience, ethnic origin, nationality or status, age, religious beliefs, gender, disability.
- **Respect:** the opinion and choice of the survivor must always be respected; service providers provide information and support only. The decision on further actions is taken by the survivor. Even if we don't agree with their choice, we have to respect it.
- **Children (under the age of 18) who have suffered or are at risk** of being abused should be referred or served in consultation with entities trained to address the special needs of children who have experienced SEAH and who are familiar with local procedures in the field of child protection.

3. Key stages of the referral process include:

- **Inclusion:** explanation of the process of referral and obtaining informed consent of the survivor.
- **Assessment:** assessment of the needs of the survivor, including security needs.
- **Planning:** Identifying the appropriate service provider.
- **Implementation of the plan:** contacting the service provider, documenting and making the referral, including assistance with transportation if possible.
- **Follow-up:** maintaining contact with the survivor and the service provider.
- **Compliance with confidentiality** at all stages.

REFERRAL FORM

CONFIDENTIAL: Please restrict access to this document and store it in a secure location.

Referring organization	
Organization:	Contact person:
Phone:	e-mail:
Address:	

Host organization	
Organization:	Contact person:
Phone:	e-mail:
Address:	

Information about the survivor of SEAH	
Full name:	Phone:
Address:	Age:
Gender	Country of origin/country of registration:
Language	Identification number
Data is indicated if the survivor is a person (minor) under the age of 18	
Full name of the main legal representative:	Degree of kinship with the child:
Contact information of the legal representative:	Is the child separated from his/her parents or other accompanying adults? <input type="checkbox"/> Yes <input type="checkbox"/> No
Has the legal representative been informed of the referral? <input type="checkbox"/> Yes <input type="checkbox"/> No (if "no", please explain)	

Additionally, background information on the reasons for the referral	
Was the survivor informed about the reasons for the referral? <input type="checkbox"/> Yes <input type="checkbox"/> No (if "no", please explain below)	Was the survivor referred to another organization? Yes <input type="checkbox"/> No (if yes, please explain below)

Requested services		
<input type="checkbox"/> Psychological support services	<input type="checkbox"/> Protection and support services	<input type="checkbox"/> Shelter
<input type="checkbox"/> Psychosocial support	<input type="checkbox"/> Legal assistance	<input type="checkbox"/> Material assistance
		<input type="checkbox"/> Nutrition

<input type="checkbox"/> Social services <input type="checkbox"/> Medical assistance	<input type="checkbox"/> Education <input type="checkbox"/> Support by providing means of livelihood	<input type="checkbox"/> Support for children born as a result of SEAH
It is necessary to give an explanation why the person needs a specific type of service:		

Consent to the transfer of information. (Read the document with the survivor/ his/her legal representative and answer any questions before he/she signs below. Sign on behalf of the survivor/legal representative if consent is given verbally, and the survivor/legal representative cannot sign this document.)

I, _____ (full name of the survivor), understand that the purpose of referring and disclosing this information to _____ (name of host organization) is to ensure safety and provide appropriate services. _____ (name of referring organization) clearly explained to me the procedure, directions and listed the exact information that must be disclosed. By signing this form, I agree to provide this information.

Signature of the responsible person (the survivor or his/her legal representative, if the case concerns a child):

Date (DD / MM / YY):

Referral details

Any contact or other restrictions? ☐ Yes ☐ No (if yes, explain below)

Referral sent: ☐ Phone (in emergencies only) ☐ Email ☐ In person

The following response steps are expected through: ☐ Tel. ☐ E-mail mail ☐ In person. By (DD / MM / YY):

The organizations agree to exchange in the future:

Recipient's full name and signature: _____ Date of receipt (DD/MM/YY): _____

List of contacts for referring survivors of SEAH

FREE HOT LINES AND TRUST LINES

- National hot line for prevention of domestic violence, human trafficking and gender-based discrimination: 0 800 500 335 (landlines) or 116 123 (mobile phones).
- National children's hot line: 8 800 500 224 (landlines) or 116 111 (mobile phones).
- Free 24/7 hot line for victims of domestic violence: 1547
- Free 24/7 legal aid hot line: 0 800 213-103
- 24/7 hot line of psychological support of ATO participants and their families: 0 800 505 085
- All-Ukrainian trust line: 0 800 501 701
- Hot line of the National Police of Ukraine: 0 800 500 202
- National hot line on HIV/AIDS: 0 800 500 451
- Information line of free secondary legal aid centers: 0 800 213 103.
- Trust line PIN/ 'Liudyna v bidi': 0 800 210 160
- 'Proliska' humanitarian mission: 093 202 22 32 or 096 404 10 34

HEALTHCARE FACILITIES

LAW ENFORCEMENT (POLICE)

DAY CENTRES OF SOCIOPSYCHOLOGICAL AID

Use the link to see the list of sociopsychological aid centres:

<https://www.msp.gov.ua/news/14909.html>

MOBILE TEAMS OF SOCIOPSYCHOLOGICAL AID

Information about mobile sociopsychological aid teams in Ukraine is available at the website of the Ministry of Social Policy of Ukraine: <https://www.msp.gov.ua/news/18476.html>

DEPARTMENT OF SOCIAL PROTECTION | COORDINATOR OF VIOLENCE PREVENTION AND RESPONSE

Contact data of departments of social policy of oblast state administrations:

<https://www.msp.gov.ua/news/8506.html>

CENTRES OF SOCIAL SERVICES FOR FAMILY, CHILDREN AND YOUTH

Contact data of oblast centres of social services for family, children and youth:

<https://www.msp.gov.ua/news/14911.html>

OFFICE OF CHILDREN'S SERVICE

Contact data of the Office of Children's Services:

<https://www.msp.gov.ua/content/sluzhbi-u-spravah-ditey-v-otg.html>

CENTRES OF FREE SECONDARY LEGAL AID

Contact data of local centres of free secondary legal aid: <https://www.legalaid.gov.ua/tsentry/>

AUTHORITIES IN CHARGE OF GENDER EQUALITY AND VIOLENCE PREVENTION

Ukrainian Parliament Commissioner for Human Rights: Phone: 0 800 50 17 20, e-mail: hotline@ombudsman.gov.ua, address: 01008, Kyiv 08, Instytutska str. 21/8
Government Commissioner for Gender Policy, phone: (044) 256-61-62, e-mail: levchenko@kmu.gov.ua

NGOs

- **La Strada Ukraine** is a civil society human rights organisation working to ensure gender equality, peace building, preventing gender-based violence, in particular domestic violence, fighting human trafficking and protecting rights of children through implementing standards of human rights in all areas of life of society and the state.

Contact data: National hot line for prevention of domestic violence, human trafficking and gender-based discrimination: 0 800 500 335 (landlines) or 116 123 (mobile phones). National children's hot line: 8 800 500 224 (landlines) or 116 111 (mobile phones).

- **Women's consortium of Ukraine** is an association established by women's civil society organisations to ensure equal rights and opportunities for women and men and well-being of children in Ukraine; the goal of the association is to resolve relevant problems in the area of gender equality and fulfilling children's rights through advocacy and effective cooperation with public and non-government organisations, as well as through broad involvement of local communities and institutions.

Contact data:

+38 044 - 592 - 68 - 54

info@wcu-network.org.ua

- **International Charitable Foundation 'Ukrainian Foundation for Public Health'** works in the area of public health and human rights to ensure equal opportunities for healthcare for people in difficult life circumstances.

Contact data:

4/26 Pyrohova str., office 11

Kyiv 01030 Ukraine

Phone: +38 (044) 235 08 64

Phone: +38 (044) 235 08 66

halyna.skipska@healthright.org

- **Centre for assistance for girls and women in difficult life circumstances 'Right to Health'**

2 Dovzhenko str., room 11

Kyiv 03057 Ukraine

Phone: +38 (044) 223 71 65

phone: +38 (093) 743 78 33

- **Human rights clinic, Kyiv**

- 75 Saksahanskoho str.

- 42 Yurii Illienka str., Veteran hub

7 Pusch Vodytsia, Lisova Poliana hospital line, Ukraine

Phone: +38 (098) 175 32 35

- **International non-governmental organization 'International Leadership and Development Center'** has contributed to protecting children's rights in Ukraine by developing training programs, training and developing trainers, training managers and specialists in the social sphere, organizing educational events and distributing publications.

ILDC projects:

- Do not shake a baby!

- Childhood without violence

- Advanced training courses 'Fundamentals of social work with families and children'
- Project "Protection of children from sexual exploitation, trafficking and violence"

Contacts:

Address: 6 Hertsena Str., Kyiv, Ukraine

Phone: +38 (073) 051-76-16

E-mail: training@ildcua.org

- **Charitable organization 'Volunteers: Adults to Children'** are volunteers who have united to help families with children solve crisis situations and preserve the family.

Our wards are:

- mothers who are graduates of boarding schools;
- mothers and children affected by violence in the family;
- single mothers with many children
- families who found themselves in difficult life circumstances.

Contacts:

d-dityam@meta.ua

(097) 319-37-85, (050) 911-88-21