

Approved:

/signed/

President of the International
Charitable Foundation Caritas Ukraine

Tetiana Stavnychy

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(date)

Seal: INTERNATIONAL CHARITABLE
FOUNDATION "CARITAS UKRAINE"

Ukraine, No. 21695710

No.1

SAFEGUARDING POLICY

INTERNATIONAL CHARITABLE FOUNDATION "CARITAS UKRAINE"

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I. General provisions

1. Purpose

1.1. The International Charitable Foundation "Caritas Ukraine" (hereinafter - **Caritas Ukraine**), which in its structure unites national offices in Kyiv city and Lviv city and a network of local organizations located in different regions of Ukraine (hereinafter - **Organizations Members of Caritas Ukraine network**), recognizes the right of all people to protection and security from exploitation, abuse, harassment and any other harm regardless of sex, race, culture and disability. Caritas Ukraine takes into account and recognizes that in the process of carrying out charitable activities, including the provision of charitable assistance, there is a possibility of harm and corresponding risks inherent in working with representatives of various target groups.

1.2. Safeguarding Policy (hereinafter referred to as the **Policy**) has been developed and approved to ensure the protection and safeguarding of people, especially children and vulnerable adults, from any harm that may be caused in the course of charitable activities, including by employees of the Organizations Members of the Caritas Ukraine network, including all persons working in the Organizations Members of the Caritas Ukraine network under a regular employment contract, board members, volunteers, interns, students undergoing internships (hereinafter referred to as **Personnel**), as well as partner organizations and their personnel, project donors, consultants, contractors (or any third parties that may be involved in the implementation of programs and activities of the Organizations Members of the Caritas Ukraine Network (hereinafter referred to as **Affiliates**).

1.3. Caritas Ukraine is committed to creating and maintaining an environment that promotes its core values, as defined by the Code of Ethics and Code of Conduct for the personnel of the Caritas Ukraine, both in the workplace and in charitable activities, and prevents abuse, exploitation and harassment of all people: beneficiaries, Personnel and Affiliates.

1.4. It is expected that the Personnel and Affiliates of the Organizations Members of the Caritas Ukraine network will respect and protect the dignity of all people with whom they come into contact, ensuring that their personal and professional behaviour meets the Caritas Ukraine Safeguarding Standards. At the same time, beneficiaries are expected to comply with the policies and procedures of the Caritas Ukraine Safeguarding System.

1.5. Caritas Ukraine, being aware of the needs of beneficiaries, especially children and vulnerable adults, is committed to preventing and counteracting cases of abuse, exploitation and harassment, fraud and corruption, eliminating the risks of suffering from human trafficking, promoting child protection, creating and maintaining a safe environment for all.

2. Definition of terms

2.1. The main terms used in this Policy are defined in the **Glossary of Terms** (Annex 1), which is an integral part of the Safeguarding Policy.

3. Scope of application

3.1. The Safeguarding Policy shall apply directly to:

- all Personnel of Caritas Ukraine (all employees, management, board members, interns, volunteers, students undergoing internships);
- Affiliates who are involved in any way in the implementation of programs and activities Organizations Members of Caritas Ukraine network (partner organizations and their personnel, project donors, consultants, contractors and/or any other third parties, including foreign ones);
- Beneficiaries (individuals, groups or organizations that receive charitable assistance, including the corresponding benefit, directly or indirectly, within the framework of the implementation of projects, programs or activities of the Organizations Members of the Caritas Ukraine network).

- 3.2. Caritas Ukraine works to ensure that everyone involved in working with Caritas Ukraine understands and is supported to fulfil their roles and responsibilities in the field of Safeguarding.
- 3.3. The Safeguarding Policy applies anywhere and at any time, including working and non-working hours (including vacations), at the workplace and outside it, in Ukraine and abroad.
- 3.4. Caritas Ukraine seeks to cooperate with Personnel and Affiliates who similarly respect human safeguarding and dignity, and who duly prevent any breaches of the Safeguarding System, in accordance with the procedure provided. Caritas Ukraine expects that any persons with whom Caritas Ukraine enters into employment and/or contractual relationships will be required to comply with this policy.
- 3.5. The Safeguarding Policy is also aimed at protecting the reputation of Organizations Members of Caritas Ukraine network from allegations of violations, whether substantiated or unfounded, that could have serious consequences and undermine Caritas Ukraine's ability to achieve its mission.

4. Safeguarding norms

- 4.1. The Safeguarding Policy is developed in accordance with the norms and principles of the current legislation of Ukraine, as well as international principles and standards (including humanitarian ones) in the field of human rights protection, child protection, prevention of abuse, exploitation, harassment, bullying and discrimination, human trafficking, fraud and corruption, protection of information and personal data, labour relations, charity and social work.
- 4.2. The Safeguarding Policy is based on the mission, values, goals and objectives of Caritas Ukraine, and complies with the provisions of the Code of Ethics, Code of Conduct and Children and Vulnerable Adults Safeguarding Policy of Caritas Internationalis, as well as the Caritas International Management Standard (CIMS).

5. Safeguarding principles

- 5.1. The Safeguarding Policy is based on the following principles:
1. **The principle of prevention** involves working to raise awareness about the safeguarding and implementation of measures to prevent any form of intimidation, harassment, violence, human trafficking, abuse and exploitation of all those who come into contact with the activities of Caritas Ukraine, including Personnel, Affiliates and beneficiaries, especially children and vulnerable adults.
 2. **The principle of empowerment** means applying a victim-centred approach that expands the choices available to the victim. Caritas Ukraine, Personnel and Affiliates shall always prioritize victims of intimidation, harassment, abuse and violence, bullying and discrimination, as well as other violations of the Safeguarding System, and be guided by their wishes, where possible and appropriate.
 3. **The principle of sanity, tolerance and prohibition of retaliation** implies inadmissibility of evaluation of actions and/or decisions and persecution of victims of complainants/applicants and strict prohibition of any form of retaliation for reporting violations of the Safeguarding system.
 4. **The principle of confidentiality** prohibits the collection, storage, use and dissemination of confidential information about a person without his/her consent, except in cases specified by law. Caritas Ukraine, Personnel and Affiliates must comply with the Privacy and Personal Data Protection Policy.
 5. **The principle of protection** means the desire to protect the Personnel, Affiliates, communities, beneficiaries, including children and vulnerable adults from cases of intimidation, exploitation, harassment, violence, bullying, discrimination, corruption, fraud, human trafficking and all similar attacks. In the event of a breach of the Safeguarding System, Caritas Ukraine, its Personnel and Affiliates will act in accordance with the defined and approved procedure to ensure the protection and support of the victim.

6. **The principle of accountability** provides for clear and transparent reporting forms, objective coverage of performance.

6. Safeguarding system documents

6.1. The Safeguarding System includes a system of interrelated documents and procedures approved by the President of Caritas Ukraine, in particular:

- Code of Ethics
- Realizing our values: Code of Conduct for the personnel of the Caritas Ukraine
- Policy on prevention of conflicts of interest
- Code of Conduct to protect beneficiaries from abuse and exploitation
- Protection from abuse and exploitation. Policy for the protection of children and vulnerable adults.
- Children Protection Policy and Procedures
- Anti-harassment policy
- Procedure for handling of sensitive appeals and providing feedback
- Anti-Fraud and Anti-Corruption Policy
- Anti-Human Trafficking Policy
- Anti-Terrorism Screening Policies & Procedures
- Other policies and procedures, both current and those that may be developed and approved as necessary.

6.2. In order to facilitate familiarization and awareness of all interested parties, the documents of the Safeguarding System are placed in open public access on the website of Caritas Ukraine.

6.3. Charitable Organizations members of the Caritas Ukraine network approve their own safeguarding policies, which must be consistent with the Safeguarding Policy of Caritas Ukraine. In the absence of their own safeguarding policy, when implementing programs and projects jointly with Caritas Ukraine, the Organizations Members of the Caritas Ukraine network undertake and guarantee to comply with this Policy.

6.4. In the event that the safeguarding policies of the charitable organizations-members of the Caritas Ukraine network and/or Affiliates contain provisions other than those of this Safeguarding Policy, the parties shall agree on such differences in a manner that ensures the achievement of the highest safeguarding standards.

II. Safeguarding standards

7. Safeguarding standards

7.1. The Safeguarding System of Caritas Ukraine provides for taking all necessary and reasonable measures to: (1) assess and prevent violations of the Safeguarding System, including abuse and any form of violence, exploitation, harassment, bullying and discrimination, fraud and corruption, etc.; (2) protect people, especially children and vulnerable adults, from these risks and harm; (3) respond appropriately to incidents that have occurred in accordance with the established procedure.

8. Safeguarding and protection of children

8.1. Caritas Ukraine strives to carry out charitable activities, including the implementation of programs and projects, in a manner that is safe for children. Personnel and Affiliates must create and actively maintain a safe environment that does not allow any kind of encroachment on the dignity and rights of children, prevent and reduce the risks of exploitation, violence, and harassment of children.

8.2. Recognizing the risks inherent in working with children, as well as accepting responsibility for activities with children, and seeking to strengthen joint efforts to protect children, Caritas Ukraine has developed and approved the Child Protection Policies and Procedures, which is an integral part of the Safeguarding System.

of violence against children; consulting parents/guardians, children and other family members on aspects of violence against children, children's rights and protection, individually and in groups; and much more.

9. Child labour

9.1. Caritas Ukraine recognizes that child labour is detrimental to the development and health of children, leading to depression, decreased appetite and substance use, interferes with learning, and results in children growing up without the educational training or skills necessary for a successful social and professional life. In some cases, child labour threatens the dignity and morality of the child, especially if sexual exploitation takes place. Caritas Ukraine categorically condemns all forms of forced labour and child trafficking.

9.2. Caritas Ukraine categorically does not use child labour and prohibits the involvement of children in any form of child labour, including participation in hard work and work in harmful or hazardous working conditions, as well as in underground work and work beyond the reduced working hours established by law¹.

9.3. Caritas Ukraine distinguishes between forced labour and volunteering, where children can help with charitable activities of their own free will. Persons aged 14 to 18 can volunteer only with the consent of their parents (adoptive parents), foster parents or guardian. Caritas Ukraine properly supports, ensures and organizes the safety of volunteer activities in the organization's programs and projects, including the participation of children.

10. Protection against abuse and exploitation

10.1. Caritas Ukraine strongly condemns and prohibits all forms of abuse and exploitation. Personnel and Affiliates should contribute to building a harmonious work environment based on team spirit, mutual respect and understanding.

10.2. The Personnel and Affiliates of Caritas Ukraine must respect the honour and dignity of all beneficiaries with whom they come into contact and ensure that their personal and professional behaviour always meets the highest moral standards.

10.3. For the purpose of implementing the system of safeguarding against all forms of abuse and exploitation, Caritas Ukraine's Personnel and Affiliates are prohibited from doing so:

1. Cause physical or emotional harm through acts or omissions.
2. Exchanging money, work, goods or services for sex, including sexual favours or other forms of humiliating or exploitative behaviour (including the exchange of aid belonging to beneficiaries).
3. Any sexual relationship between those providing charitable and humanitarian assistance and protection and a person receiving such assistance and protection that involves the improper use of rank or position. Such relationships undermine the credibility and integrity of humanitarian assistance.
4. Hiring, offering money, goods and services in exchange for any actions that may be considered as exploitation of a person and humiliation, including actions of a sexual nature.
5. Use their authority or position to demand payment, privilege or any other benefit.
6. Engage in any form of harassment, discrimination, physical or verbal humiliation, intimidation, favouritism or exploitative relationships.
7. Participate in any form of human trafficking.

10.4. Personnel and Affiliates are strongly discouraged from engaging in sexual relationships with people with whom they work, as they are based on a significantly unequal power dynamic. Such

¹ Article 21 of the Law of Ukraine "On Protection of Childhood"

relationships are contrary to the principles and values of Caritas Ukraine and undermine the credibility and integrity of its work.

11. Countering sexual exploitation and abuse

11.1. Caritas Ukraine has a zero-tolerance approach to sexual exploitation and abuse in any form. Sexual exploitation and abuse are acts of serious misconduct and are grounds for disciplinary action, including summary dismissal.

11.2. Preventing and combating sexual exploitation and abuse in Caritas Ukraine includes such measures as:

1. **Awareness:** ensuring that Caritas Ukraine Personnel and Affiliates are aware of the standards of behaviour expected of them in the context of combating sexual exploitation and abuse.
2. **Prevention:** promoting a safe and healthy work environment through the application of all appropriate policies and mechanisms to ensure that Personnel and those working for the organization understand and minimize the risks of any form of sexual exploitation and abuse.
3. **Reporting:** Ensuring that Personnel and Affiliates clearly understand what to do when they suspect or have concerns about allegations of any form of sexual exploitation and abuse.
4. **Response:** Ensuring that immediate action is taken to identify and address reports of any form of sexual exploitation and abuse in the workplace and to ensure the safety, care and well-being of the victim.

12. Countering harassment, discrimination and bullying

12.1. Harassment in any form (verbal, physical, visual), both in relation to beneficiaries and to the Personnel and Affiliates, is strictly prohibited.

12.2. Caritas Ukraine recognizes that harassment can take many forms. Such forms may include, but are not limited to, verbal abuse, displays, offensive jokes, cartoons, photographs, posters, comments, pranks, intimidation, touching, physical aggression, violence, use of computer systems, unwelcome sexual advances, solicitation of sexual favours, or other verbal or physical contact of a sexual nature.

12.3. Caritas Ukraine recognizes that all persons, regardless of their specific characteristics, have equal rights and freedoms, as well as equal opportunities for their realization. Any discrimination and harassment (bullying) based on race, skin colour, religious, philosophical or political preferences, sex, age, national or ethnic origin, health status, refugee status, veteran/military status, citizenship status, etc. is unacceptable.

12.4. In the event that any facts about incidents of harassment, discrimination or bullying become known, the Personnel and Affiliates are obliged to immediately submit a report (application, complaint) through the feedback channels specified in this Policy.

13. Countering human trafficking

13.1. Caritas Ukraine opposes any form of human trafficking (labour and sexual exploitation, forced begging and involvement in criminal activities, trafficking for the purpose of removal of organs, etc.) and, based on its own actions and programs, is actively committed to reducing the risk of human trafficking. Caritas Ukraine applies a zero-tolerance policy towards its Personnel and Affiliates in case of their involvement in any form of human trafficking or forced labour (provided that a court decision on finding a person guilty of such a crime enters into force).

13.2. The guiding principles of the Caritas Ukraine network on combating human trafficking are defined in the Anti-Human Trafficking Policy.

13.3. Caritas Ukraine prohibits the following:
– involvement in human trafficking in any form;

- engaging in sexual activities for commercial purposes that may be directly related to Caritas Ukraine at any time;
- use of forced labour of any kind on any grounds;
- destruction, concealment, confiscation or other denial of access to his/her identification or immigration documents;
- use of deceptive or fraudulent recruitment methods;
- charging fees for hiring candidates for employment;
- non-payment of contractual transportation costs for the return of certain employees who have completed their work outside the country of residence of the respective employees;
- providing or arranging housing that does not meet the living and/or safety standards in the host country;
- failure to provide a written confirmation of employment or a similar work document before the employee leaves his/her country of origin.

14. Combating fraud and corruption

14.1. Caritas Ukraine is strongly committed to creating an environment conducive to preventing and combating corruption and fraud, which also includes prohibited practices such as bribery, kickbacks, gift corruption, nepotism extortion, embezzlement, money laundering, terrorist financing and other violations in accordance with national legislation and international standards, as well as the documents of the Safeguarding System, including the Anti-Corruption and Anti-Fraud Policy.

14.2. Caritas Ukraine maintains zero tolerance and in no way allows any corrupt or fraudulent practices in the work of the Caritas Ukraine network. In their daily work, Caritas Ukraine Personnel and Affiliates shall:

1. Avoid relationships and situations that in any way raise suspicion of corruption or fraud.
2. Work or cooperate in such a way as to prevent corruption and fraud to the maximum extent possible, to ensure compliance with clear rules and transparent administration of all operational processes in their activities, being aware of the constant risks of corruption, fraud and conflicts of interest.
3. Promote the principle of zero tolerance and the eradication of corruption and fraud during and after working hours.

14.3. The following methods are used to minimize the risks of corruption and fraud in the Organizations Members of the Caritas Ukraine network:

- Ensuring that all income and expenses, as well as receipts, invoices and supporting documents are recorded.
- Guaranteeing the implementation and execution of internal financial control.
- Restriction and strict control of access to confidential information.
- Conducting a systematic internal audit to verify financial activities and compliance with approved policies and procedures in the Caritas Ukraine network.
- Establishing clear and defined personnel functions and reporting lines.
- Awareness of personnel to recognize signs of possible corruption and fraud.
- Organizing the implementation of relevant procedures in accordance with the Procurement regulation for goods and services ICF “Caritas Ukraine” and the Anti-Terrorism Screening Policies & Procedures.
- Adherence to a clear matrix of authorization of payments in accordance with the procurement procedure in each Organization Members of the Caritas Ukraine network.

15. Conflict of interests

15.1. Caritas Ukraine is committed to preserving the integrity of the organization and the network and ensuring that conflicts of interest among its Personnel and Affiliates are avoided, for which purpose the Conflict of Interest Prevention Policy has been approved.

15.2. In order to avoid conflicts of interest, Personnel and Affiliates are prohibited from engaging in any business activities:

1. Use the financial resources of Caritas Ukraine to obtain goods and services to meet their personal or family needs.
2. Solicit or accept, directly or indirectly, any gift, monetary reward or service of significant economic value from donors and beneficiaries.
3. Order goods or services provided by a supplier in case of personal financial interest or financial interest of family members.
4. Use the name of Caritas Ukraine to open their own bank accounts or create accounts on social media.
5. Independently reimburse their own expenses at the expense of the organization.

15.3. All applicable rules and procedures regarding the use and accounting of Caritas Ukraine and/or public funds must be strictly adhered to.

15.4. Employment of relatives who will be directly subordinate to each other is permissible only if such employment will not contribute to the material interest of employees. Such cases are considered by the President/ General Secretary on a case-by-case basis.

III. Procedures and powers

16. Safeguarding system breach

16.1. Any failure to comply with the requirements of this Policy, as well as all interrelated policies and procedures, including cases of abuse, exploitation, harassment, bullying and discrimination, human trafficking, fraud and corruption, conflicts of interest and any other incidents, including those involving children and vulnerable adults, shall constitute a Safeguarding system breach.

17. Reporting a Safeguarding system breach

17.1. Caritas Ukraine ensures that individuals, communities, beneficiaries, Personnel and Affiliates have the opportunity to report any identified deficiencies, concerns or violations of the Policy using appropriate secure, accessible and confidential channels.

17.2. Personnel and Affiliates are obliged to immediately report through feedback mechanisms any suspicions and/or facts of a breach of the Safeguarding System as soon as they become aware of them.

17.3. Every person who witnesses a Safeguarding System breach, every person who has been informed about such a breach, and every person who has been a victim of a breach shall report it as soon as possible through the established feedback channels:

- ✓ by e-mail: feedback@caritas.ua;
- ✓ via online form on the website;
- ✓ by calling the hotline;
- ✓ in person to the Person Responsible for Implementation of the Safeguarding System (PRISS).

17.4. The complainant may submit a sensitive complaint (notice, statement) regarding the following through the feedback channels specified in clause 17.3. of this policy:

1. Behaviour of the Personnel and Affiliates of the Organizations Members of the Caritas Ukraine network.
2. Financial issues such as misuse of funds, fraud, corruption or conflict of interest.
3. Cases of abuse, exploitation (including sexual), harassment, discrimination and bullying.
4. Any type of physical, psychological, economic or sexual violence.

17.5. Personnel and Affiliates are not responsible for deciding on the type of violation of rules and procedures, but they are obliged to report their concerns and suspicions.

17.6. If Personnel fails to report a problem or incident, or if they provide false information about an incident, disciplinary proceedings may be initiated against the employees concerned.

17.7. Caritas Ukraine guarantees the confidentiality of the information received, protection and security of the applicant at all stages of the proceedings in coordination with specialized national protection actors.

18. Procedure for consideration of sensitive appeals.

18.1. The procedure for consideration of sensitive appeals is determined by the Procedure for handling of sensitive appeals and provision of feedback and includes the relevant stages:

1. Recording of a sensitive appeal.
2. Initial processing of information by the Complaint Handler.
3. Establishment of a Commission for the Consideration of Sensitive Appeals (CCSA).
4. Initial verification, assessment of the complaint by the CCSA and approval of the course of action.
5. Appointment of Specialized Analysts for Research and Information Collection (SARIC).
6. Investigation process.
7. Consideration of the results of the CCSA investigation and issuance of a decision.
8. Notification of the parties of the results.
9. Appeals (if necessary).

19. Victim-centred approach

19.1. Caritas Ukraine is committed to using a victim-centred approach in investigating violations of the Safeguarding System:

1. The decision on the necessary support and assistance will be made by the victim.
2. All measures taken within the framework of the Safeguarding procedures must be guided by respect for the choices, wishes, rights and dignity of the victims.
3. The safety of survivors is the top priority.
4. Maintaining confidentiality: people have the right to choose who to tell and who not to tell about their experiences.
5. Ensuring non-discrimination: equal and fair treatment of all who need support.
6. Informing about the services that are available to help survivors, as well as the services and organizations that provide them.

19.2. Personnel, Affiliates and beneficiaries affected by the investigation will also be supported:

- Access to medical and psychosocial support through an internal or external specialist (referral procedure).
- Support and involvement of the HR manager for the personnel (including informing colleagues about the employee's absence from the workplace, assistance in preparing for return to work, etc.)
- Access to a mentor to build confidence in returning to work (for employees only).
- Access to trainings, e.g. on first aid, to build resilience (if needed).
- Providing protection if a person is in danger.

19.3. The Organizations Members of the Caritas Ukraine network undertake to have a list of local services and organizations that provide specialized support to victims of abuse, exploitation and harassment to provide support during the investigation of incidents of violation. If necessary, as part of the referral procedure, the victim can receive contacts and information about services and organizations that can provide appropriate assistance and support.

20. Measures in case of violation of the Safeguarding System requirements

20.1. In the event of a breach of the Safeguarding System confirmed during the Procedure for consideration of sensitive appeals and provision of feedback, the Commission for Consideration of Sensitive Appeals (CCSA) shall decide on an appropriate corrective action (appropriate systemic organizational or programmatic measures), taking into account the seriousness of the Policy violation, and appoint persons responsible for implementing corrective measures.

20.2. Caritas Ukraine prohibits any person working in the Caritas Ukraine network from retaliating against any other person who has reported abuse, exploitation, harassment, any form of violence, fraud, conflict of interest or any other violation of the Safeguarding System. No retaliation will be taken against an

employee or volunteer who has reported suspected harassment in good faith. Caritas Ukraine will act strictly in case of discriminatory treatment or harassment of such an employee or volunteer by other personnel or volunteers.

- 20.3.** Failure to comply with the provisions of this Policy may result in a number of actions and consequences, which for personnel may include (but are not limited to): verbal warnings, written warnings, mandatory training or consulting, suspension and/or termination of employment.
- 20.4.** If it becomes aware of possible incidents, Caritas Ukraine undertakes to take appropriate action as soon as possible, even if the person (or persons) affected do not expect Caritas Ukraine to do so.

21. Liability for Safeguarding System breach

- 21.1.** Caritas Ukraine is committed to strengthening its culture of accountability that prevents misconduct and abuse through prevention and training activities, and to conducting appropriate background checks on personnel during recruitment. Caritas Ukraine will also facilitate compensation for damages caused by false accusations.
- 21.2.** All persons working in the Caritas Ukraine network, and especially managers, are responsible for protecting the work environment from violations of the Safeguarding System.
- 21.3.** In the event that during the consideration of sensitive appeals it is established and confirmed that the Safeguarding System has been violated by the Personnel of the Caritas Ukraine network, such Personnel will be brought to disciplinary responsibility as provided for by the Labor Code of Ukraine and the Internal Labour Regulations of Caritas Ukraine.
- 21.4.** Caritas Ukraine guarantees that any disciplinary measures may be applied to the Personnel only upon the results of the investigation.
- 21.5.** Affiliates with whom Caritas Ukraine enters into civil law and other agreements and contracts shall, in the course of cooperation with the Organizations of the Caritas Ukraine network, comply with the provisions of this Policy and all related documents specified in clause 6.1. Violation of the provisions of the Policy by these persons shall be grounds for termination of contractual and/or partnership relations with these persons.
- 21.6.** The Personnel and Affiliates of the Organizations Members of the Caritas Ukraine Network may be held criminally liable for offenses that constitute a criminal offense in accordance with the procedure established by the Criminal Code of Ukraine.

22. Employment and training of personnel

- 22.1.** Caritas Ukraine adheres to the highest standards of human resources management and employment to meet the standards of the Safeguarding system, including through the safe recruitment, adaptation and training of Personnel.
- 22.2.** The procedure for recruiting personnel in Caritas Ukraine, as well as transferring to another vacant position within the organization, is carried out in accordance with the Provisions for Search and Recruitment Of Personnel. In order to achieve the goals of safe employment, when selecting candidates for vacant positions, references, previous work experience, court convictions, and facts of cooperation with terrorist organizations are checked in accordance with the Anti-Terrorism Screening Policies & Procedures.
- 22.3.** Before starting work, the Personnel shall undergo an adaptation period, which includes an introductory briefing on the Code of Conduct, policies and procedures of the Safeguarding system. The Personnel shall certify their familiarization with the documents of the Safeguarding system, as well as their understanding, by appropriate official statements and signatures. In all cases when the Personnel of the Member Organizations of the Caritas Ukraine network have questions about the Safeguarding system,

which includes all applicable policies and procedures, they are obliged to ask for explanations from their immediate supervisor (and/or the person responsible for the implementation of the Safeguarding system).

23. Affiliates

- 23.1.** Caritas Ukraine expects that Affiliates, which include partner organizations and their personnel, project donors, consultants, contractors and/or any third parties that may be involved in the implementation of programs and activities of the Organizations Members of the Caritas Ukraine network, will familiarize themselves with and comply with the policies and procedures of the Safeguarding system as defined in clause 6.1 of this Policy.
- 23.2.** All contracts and agreements concluded between Caritas Ukraine and Affiliates must include provisions on familiarization with and compliance with the Safeguarding Policy, including reporting any breaches of the Safeguarding system through the established feedback channels.
- 23.3.** Personnel working with Affiliates must ensure that Affiliates and their personnel comply with the Safeguarding Policy.
- 23.4.** If Caritas Ukraine Personnel suspect a breach of the Safeguarding system by an Affiliate, they should report their concerns and suspicions through the established feedback channels.

24. Responsible persons

- 24.1.** The persons responsible for implementing and ensuring compliance with the Policy at all levels are: The President, the National Person Responsible for Implementation of the Security System (NPRISS), the Persons Responsible for Implementation of the Security System (PRISS) in the Organizations Members of the Caritas Ukraine network, the Complaint Handler, the Specialist Analysts for Research and Information Collection (SARIC), the Commission for Consideration of Sensitive Appeals (CCSA) in accordance with their job descriptions and powers granted in accordance with the Procedure for handling of Sensitive Appeals and Providing Feedback.

25. Data protection

- 25.1.** Caritas Ukraine is obliged to apply the highest level of protection when processing personal data. Personal information received during the consideration of sensitive appeals and investigations related to Safeguarding system breaches of Caritas Ukraine shall be processed in accordance with the requirements of the current legislation of Ukraine and the Policy of confidentiality and protection of personal personal data of beneficiaries.
- 25.2.** Caritas Ukraine ensures public dissemination of information about official communication channels for submitting reports (complaints, statements) in accordance with this Policy. Caritas Ukraine is not responsible for information related to the Safeguarding system, but submitted to feedback channels other than those specified in this Policy.
- 25.3.** For all communications, Caritas Ukraine uses only official e-mail addresses with the domain "caritas.ua". All Personnel are obliged to use the Signal application for internal information exchange and are encouraged to use the Signal application for external information exchange. Caritas Ukraine recommends that all Affiliates and beneficiaries use the Signal application for information exchange.

26. Periodic revision

- 26.1.** The Safeguarding Policies are subject to review, amendment and supplementation depending on the needs, conditions and circumstances, but at least once a year. All current revisions of the Policy shall be recorded in the Revision Log Sheet (Annex No. 8).

| | |
|---|--|
| Child | Any person under the age of 18 (regardless of the local/regional specifics of determining the age of majority) ⁴ . |
| Child labour | See "Exploitation". |
| Harassment | Behaviour that, based on race, colour, religion, gender, national origin, age, disability or genetic disease, etc., may offend or humiliate another person, or behaviour that systematically violates the boundaries of others, including psychological pressure. |
| Emotional (psychological) violence | See "Abuse". |
| Exploitation | <p>Any abuse or attempted abuse of a position of vulnerability, power or trust for monetary, social or political gain. There are different types of exploitation, namely:</p> <ol style="list-style-type: none"> 1. Sexual exploitation: any actual or attempted abuse of a position of vulnerability, power or trust to obtain a benefit (material, social or political) through the sexual exploitation of another person⁵. 2. Child labour: hired labour, including employment in entrepreneurial activities of persons under the age of working capacity, which threatens their physical and psychological development and violates their fundamental rights. 3. Human trafficking is the implementation of an illegal transaction involving a person, as well as the recruitment, transportation, harbouring, transfer or receipt of a person, committed for the purpose of exploitation, using fraud, blackmail or vulnerable condition of a person; a form of modern slavery and human rights violations, with the aim of making a profit from the exploitation of men, women and children. <i>Forms of human trafficking: sexual exploitation; use in the pornography business; involvement in criminal activity; involvement in debt bondage; adoption for profit; use in armed conflicts; exploitation of labour; forced labour; forced pregnancy; removal of organs; conducting experiments on a person without his or her consent; forced labour</i>⁶. 4. Survival sex: having sex or being forced to have sex as a last resort when a child or vulnerable adult is living in poverty or in an emergency situation. This is transactional sex in exchange for food, water, medicine, shelter, money, and any other necessary needs for the person's holistic survival. |
| Victim | A person who has been harmed or suffered in any way due to a security breach. |
| Neglect | See "Abuse". |
| Protection | Responsibility and action to prevent and respond to abuse, exploitation, violation of the rights of a child or vulnerable adult, including: raising awareness, promoting training, identifying and responding to all complaints, monitoring and evaluating protection measures, and personal accountability. |

⁴ Adapted text from IASC (2013): Guidelines to implement the Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel": <https://interagencystandingcommittee.org/protection-sexual-exploitation-and-abuse/documents-public/guidelines-implementation-minimum-operating>

⁵ United Nations (2017): Glossary on Sexual Exploitation and Abuse: Thematic Glossary of current terminology related to Sexual Exploitation and Abuse (SEA) in the context of the United Nations: <http://pseataaskforce.org/uploads/tools/1501161761.pdf>, no.6

⁶ What is human trafficking. Hotline on combating human trafficking, preventing and combating domestic violence, gender-based violence and violence against children: <https://1547.ukc.gov.ua/dovidkova-informatsiya/protydiya-torgivly-lyudmy/shho-take-torgivlya-lyudmy?/>.

| | |
|-------------------------------|--|
| Data protection | The systematic implementation of a set of institutional, technical and organizational measures to protect the right to privacy in the context of the collection, storage, use and disclosure of personal data ⁷ . |
| Protection of children | Preventing and responding to violence, exploitation and abuse of children, including sexual exploitation and abuse, human trafficking, child labour and harmful traditional practices. This is part of a broader area of work known as Confidence in Safety. |
| Disciplinary measures | Restrictive measures (sanctions) applied by the institution/organization based on the results of the investigation to the person who committed the relevant violation, or would be applied if the fact of the violation was confirmed by the results of the investigation completed after the person's dismissal from the institution/organization. ⁸ |
| Consent | See "Informed Consent". |
| Abuse | <p>Any act or omission that causes harm to another person. This can include physical abuse, emotional abuse, sexual abuse, and neglect. It also includes abuse on the Internet and/or through mobile technology. There are different types of abuse, including:</p> <ol style="list-style-type: none"> 1. Sexual violence: Any actual or threatened sexual act of violence committed against a child or adult, by force or in an unequal or coercive environment. Examples of sexual violence include rape, forcible sexual contact such as unwanted touching and non-contact sexual violence such as sexting and verbal or behavioural sexual harassment. 2. Physical abuse: Actual or suspected physical harm to a child or adult, such as hitting, kicking, or shaking, where there is some knowledge or reasonable suspicion that an injury has been caused or was not knowingly prevented. 3. Psychological abuse: harm caused by sustained or severe emotional abuse or neglect, such as humiliating punishment, threats, bullying, and withholding care and affection. 4. Economic violence: a form of domestic violence that includes intentional deprivation of housing, food, clothing, other property, funds or documents or the ability to use them, abandonment or neglect, obstruction of necessary treatment or rehabilitation services, prohibition to work, forced labour, prohibition to study and other economic offenses⁹. 4. Neglect: harm that occurs when basic needs, such as food, warmth and medical care, are not met, or when there is no prevention of exposure to any type of danger. <p>Abuse occurs when a person uses his or her right contrary to the purpose for which the right is recognized, or uses it in a manner that is manifestly disproportionate to that purpose¹⁰.</p> |

⁷ IASC Operational guidance on responsibilities of Cluster/Sector leads & OCHA in information management, IASC Working Group Geneva, 4 December 2008: https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/IASC_operational_guidance_on_information_management.pdf

⁸ The inter-agency scheme for the disclosure of safeguarding-related misconduct in recruitment process within the humanitarian and development sector: How to implement guide, p.5: <https://static1.squarespace.com/static/57ffc65ed482e9b6838607bc/t/5e2abf58256bbc3c10c42275/1579859810130/SCH-R+Misconduct+Disclosure+Schemet+-+How+tot+implement+guide+Jan+2020.pdf>

⁹ Law of Ukraine "On Preventing and Combating Domestic Violence": <https://zakon.rada.gov.ua/Laws/show/2229-19#Text>

¹⁰ UNIDROIT Principles of International Commercial Contracts 2016. International Institute for the Unification of Private Law (UNIDROIT), Rome. 460 pp

| | |
|---------------------------------|--|
| Disability | A measure of the loss of human health due to illness, injury or its consequences, or congenital disorders. |
| Informed consent | <p>Voluntary consent of the participant to use the information in the specified manner.</p> <p><i>*Note: if it is necessary to obtain informed consent from a child, the age-specific characteristics of this category should be taken into account - it is also necessary to obtain informed consent from one of the child's parents or guardian. Persons with disabilities may require appropriate support in the process of providing such consent, given the specifics of their disabilities. In any case, even if informed consent is obtained, it can be withdrawn at any time. Moreover, the person responsible for collecting the information is obliged to assess the potential consequences of its use for the personal safety of the provider and other persons involved in the process, as well as to minimize any risk of harm resulting from the use of this information¹¹.</i></p> |
| Information | Any information and/or data that can be stored on tangible media or displayed electronically ¹² . |
| Incident | An incident, event or occurrence related to a breach of the Safeguarding System or suspicion of such a breach. |
| Confidential information | Information about an individual; information, access to which is restricted to an individual or legal entity, except for public authorities, as well as information recognized as such by law. Confidential information may be disseminated at the request (consent) of the relevant person in the manner determined by him/her in accordance with the conditions provided for by him/her, unless otherwise provided by law ¹³ . |
| Conflict of interests | See "Corruption". |
| Corruption | <p>The use by an authorized person of his/her official powers or related opportunities to obtain an unlawful benefit or acceptance of such benefit or acceptance of a promise/offer of such benefit for himself/herself or other persons, or, accordingly, a promise/offer or provision of an unlawful benefit to an authorized person or, at his/her request, to other individuals or legal entities in order to induce this person to unlawfully use his/her official powers or related opportunities. Corruption encompasses various forms of active or passive misconduct, including, but not limited to, the following:</p> <ol style="list-style-type: none"> 1. Conflict of interests is the presence of a personal interest that affects or may potentially affect the impartial and objective performance of official duties. 2. Bribery is the offering, giving (active bribery), receiving, demanding or accepting (passive corruption) of anything of value to influence the actions of an official in the performance of his/her public and statutory obligations. 3. Kickback is a form of bribery through negotiation in which a person receives a bribe (i.e., a remuneration that is agreed upon in advance: money, goods or services to be transferred) in exchange for services rendered. A |

¹¹ Adapted text from «United Nations (2017): Glossary on Sexual Exploitation and Abuse: Thematic Glossary of current terminology related to Sexual Exploitation and Abuse (SEA) in the context of the United Nations»: <http://pseata.skforce.org/uploads/tools/1501161761.pdf>, no.62

¹² The Law of Ukraine "On Information": <https://zakon.rada.gov.ua/laws/show/2657-12#Text>

¹³ The Law of Ukraine "On Information": <https://zakon.rada.gov.ua/laws/show/2657-12#Text>

kickback differs from other types of bribery in that it involves a prior agreement between the two parties, rather than one party demanding a bribe from the other. The purpose of a kickback is usually to induce the other party to cooperate in an illegal scheme.

4. Corruption in relation to gifts covers cases where a gift or other financial reward is offered, given, requested or received with the expectation of receiving a favour in return.

5. Nepotism is the favouring of family members or friends regardless of their competence. Employees are treated favourably because of personal relationships rather than a professional and objective assessment of their skills and qualifications.

6. Extortion is the unlawful demand or obtaining of money or property through intimidation. Extortion may include threats of physical or material harm, threats to accuse someone of a crime, or threats to disclose certain undesirable information.

7. Embezzlement is the misappropriation or misuse of property or funds legally entrusted to a person by virtue of his/her authority.

Corruption in relation to gifts
Violence against children

See "Corruption".

According to the World Health Organization (WHO), "child abuse, sometimes referred to as child violence or child neglect, includes all forms of physical and emotional maltreatment, sexual abuse, neglect and exploitation that result in potential harm to the child's health and dignity. Within this broad concept, *five subtypes can be distinguished: physical abuse, sexual abuse; neglect and negligence; emotional abuse; and exploitation.*¹⁴"

Unreasonable

The case when the available evidence was insufficient to complete the investigation or the investigation concluded that the evidence was insufficient to establish that a violation of the Safeguarding System was committed, for a number of reasons, does not always mean that the allegation was found to be false.

Nepotism

See "Corruption".

Allegations of sexual exploitation and abuse

Reporting acts of sexual exploitation or abuse, which, after conducting an appropriate review, was found to contain sufficient information to initiate an investigation¹⁵.

Substantiated

During the investigation, it was found that there was sufficient evidence to establish that a breach of the Safeguarding System had occurred.

Person with a disability

A person with a persistent physical, mental, intellectual, or sensory impairment that, when interacting with various barriers, may prevent them from participating fully and effectively in society on an equal basis with others¹⁶.

Personal interest

An advantage for oneself or for family members, relatives, friends, and persons or organizations with whom employees have or have had business or political relationships.

Implementation partner (implementing partner)

The entity that is accountable and responsible for ensuring the proper use of resources provided by the donor agency, as well as for the implementation and

¹⁴ World Health Organization. Violence against children. https://www.who.int/health-topics/violence-against-children#tab=tab_1

¹⁵ It concerns information about: the subject of the report, the injured person(s), witnesses, forensic examination data, additional evidence and supporting facts, etc.

¹⁶ UN Convention on the Rights of Persons with Disabilities: https://zakon.rada.gov.ua/laws/show/995_tg71#Text

management of the program in accordance with the work plan. Such partners may include (but are not limited to) government agencies, intergovernmental organizations, NGOs that meet the criteria for partnership, and UN agencies¹⁷.

| | |
|---------------------------------------|--|
| Humanitarian sector personnel | All personnel involved in providing protection and/or assistance to the affected population who are subject to contractual relations with participating/partner organizations, including motivated personnel from beneficiary communities. This refers to personnel of humanitarian organizations and missions, including UN agencies, intergovernmental organizations, implementation partners, NGOs and relevant community-based organizations (paid personnel, volunteers, contract workers, consultants, motivated personnel and other persons performing relevant functions on behalf of any humanitarian organization or mission, regardless of the type or duration of their contract ¹⁸ . |
| Personal data | Information or a set of information about an individual who is identified or can be specifically identified ¹⁹ . |
| Suspicion | A person who is suspected of abusing, exploiting, or knowingly allowing the abuse of a child or vulnerable adult. Such abuse or exploitation can cause physical, sexual, emotional, psychological or other harm to a person. The investigation should determine the guilt of the suspect. |
| Initial assessment | Reviewing the information received to determine whether it is necessary to initiate an investigation (whether the facts are sufficient to bring charges of sexual exploitation and abuse) or to collect additional information to make a decision ²⁰ . |
| Persecution | Unwanted, persistent, or intrusive attention by a person or group to another person that causes fear, anxiety, emotional or mental distress and is a form of harassment. |
| Personnel | Caritas Ukraine employees, including all personnel, management, board members, interns and volunteers. |
| Concerns | A cause of concern or anxiety that is not, at some point, supported by evidence and is not recognized as true ²¹ . In the context of sexual exploitation and abuse, a suspicion and/or rumour that personnel of an organization, program or mission are involved (past or present) in harm. |
| Notification of charges | A written communication sent by the responsible agency to a designated party, stating the facts underlying the charge and requesting the party to provide comments. Usually sent during the course of an investigation ²² . |
| Reporting a potential incident | Information is provided (by the applicant or another person (source)) about behaviour that may contain signs of a violation of the Safeguarding System, |

¹⁷ United Nations (2017): Glossary on Sexual Exploitation and Abuse: Thematic Glossary of current terminology related to Sexual Exploitation and Abuse (SEA) in the context of the United Nations: <http://pseataforce.org/uploads/tools/1501161761.pdf>, no.42

¹⁸ Inter-Agency Standing Committee (2016): Best Practice Guide: Inter-Agency Community-Based Complaint Mechanism, p.x

¹⁹ Law of Ukraine "On Personal Data Protection" <https://zakon.rada.gov.ua/laws/show/2297-17#Text>

²⁰ United Nations (2017): Glossary on Sexual Exploitation and Abuse: Thematic Glossary of current terminology related to Sexual Exploitation and Abuse (SEA) in the context of the United Nations: <http://pseataforce.org/uploads/tools/1501161761.pdf>, no.56

²¹ Protekhnén (2019): 20 core elements: a toolkit to strengthen safeguarding report-handling, Bond

²² Adapted text from «United Nations (2017): Glossary on Sexual Exploitation and Abuse: Thematic Glossary of current terminology related to Sexual Exploitation and Abuse (SEA) in the context of the United Nations»: <http://pseataforce.org/uploads/tools/1501161761.pdf>, no.58

including in terms of combating sexual exploitation and abuse, as well as the provisions of the Code of Ethics and Conduct, but requires verification.

| | |
|--|---|
| Absolute (zero) tolerance policy | A policy that prohibits any manifestations of violations of the Safeguarding System by personnel, including implementation partners, and establishes mandatory liability in case of such actions. |
| Breach | Any form of violation of the requirements of the Safeguarding System, including incidents of any abuse of children, child labour, abuse, exploitation, harassment, human trafficking, fraud and corruption, and conflicts of interest. |
| Forced labour | Situations in which people are forced to work through the use of violence or intimidation, or by more disguised means, such as accumulated debt, retention of identity cards, or threats of disclosure to immigration authorities. |
| Embezzlement | See "Corruption". |
| Investigations | An analytical process that involves collecting information to determine whether a violation of the relevant provision of the applicable law has occurred and, if the violation is confirmed, to bring the perpetrators or organizations to justice ²³ . |
| Sex for commercial purposes | Any sexual act by which any person provides or receives anything of value. |
| Sex for survival | See "Exploitation". |
| Sexual exploitation | See "Exploitation". |
| Sexual violence | See "Abuse". |
| Sexual harassment | See "Harassment". |
| Sexual abuse | Any actual abuse or attempted abuse of a position of vulnerability, power or trust to obtain sexual favours, including, but not limited to, committing or threatening to commit sexual acts against sexual inviolability in a position of unequal or coercive power, or by force (including contactless interactions and acts of sexual exploitation and abuse in cyberspace). Note: any sexual act involving children is sexual abuse. |
| Safeguarding system | The set of all requirements, rules and procedures related to security and approved in the provisions of the relevant policies and procedures. |
| Complainant | A person who detects and reports suspected breaches of the Safeguarding System. |
| Subject of the report/investigation | A person whose actions are the subject of an investigation/notification ²⁴ . |
| Human trafficking | See "Exploitation". |
| Authorized persons | Employees of the institution/entity that exercises control process the data and have access to information about any violations, and are responsible for registering and further processing appeals. |

²³ United Nations (2017): Glossary on Sexual Exploitation and Abuse: Thematic Glossary of current terminology related to Sexual Exploitation and Abuse (SEA) in the context of the United Nations: <http://pseataaskforce.org/uploads/tools/1501161761.pdf>, no.60

²⁴ UN Secretary-General's Bulletin (2008): Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority, U.N. Doc. ST/SGB/2008/5, para.1.3

| | |
|--|--|
| Favouritism | The type of communication and culture of behaviour that manifests a tendency to give preference in decisions and judgments, unfair, biased protection of favourites (selected individuals). |
| Physical violence | See "Abuse". |
| Physical (corporal) punishment of a child | Any punishment that uses physical force and is intended to cause some degree of pain or discomfort, however slight ²⁵ . |
| Bribery | See "Corruption". |
| Bullying (harassment) | Manifestation of aggression with subsequent intimidation of the individual and the possibility of his or her complete subordination to oneself and one's interests. |
| Sensitive appeal | Statements and allegations that something is unsatisfactory or unacceptable in relation to the established Safeguarding System and/or there are suspicions of a breach of the Safeguarding System related to the actions/inactions of Employees or Affiliates. |
| Fraud | Taking possession of someone else's property or acquiring the right to someone else's property by fraud or breach of trust ²⁶ . |

²⁵ General comment No. 8 (2006): The Right of the Child to Protection from Corporal Punishment and Other Cruel or Degrading Forms of Punishment (Arts. 19; 28, Para. 2; and 37, inter alia).
<https://www.refworld.org/legal/general/crc/2007/en/41020>

²⁶ The Criminal Code of Ukraine: <https://zakon.rada.gov.ua/laws/show/2341-14#Text>

International Standards of Conduct for Caritas Ukraine in relation to children

Personnel and Affiliates of the Organizations Members of the Caritas Ukraine network shall be aware of the attitude and appearance of disrespectful language, actions and relationships with children and protect them from harm. Personnel and Affiliates should be aware that the dignity of every child should be upheld at all times and that all children should be treated with respect.

The following description sets forth the behavioural expectations of Personnel and Affiliates when interacting with children (any person under the age of 18).

Personnel and Affiliates of Caritas Ukraine:

| HAVE TO | ARE PROHIBITED |
|--|---|
| <ol style="list-style-type: none"> 1. Behave in a manner consistent with the values of Caritas Ukraine, including compliance with the Caritas Ukraine Code of Conduct and Code of Ethics. 2. Treat all children and their families with respect, regardless of race, color, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. 3. Listen to children. 4. Provide a welcoming, inclusive and safe environment for children that prevents any form of abuse and exploitation. 5. Be sensitive when with children (i.e. language, conversations, touch, gestures). 6. Respect cultural differences that do not harm children. 7. Be clear in actions and location. 8. Have at least one other adult with the child whenever possible. Caution and discretion should be used in all one-on-one situations. 9. Ensure that an adult is present during transportation of the child; if this is not possible, obtain permission. 10. Report any concerns about child abuse or exploitation. 11. Disclose all charges or convictions if they relate to child exploitation. 12. Act in accordance with the applicable laws of the country. 13. Provide supervision of contact with children, accompanying or at least being with children in full view of other adults. | <ol style="list-style-type: none"> 1. Hitting and physically abusing children (even if it is traditionally acceptable in the area). 2. Emotionally or verbally abuse a child. 3. Being harsh with a child. If the child feels uncomfortable, stop the contact. 4. Have sex or any sexual activity with a child. 5. Send humiliating or harmful written or verbal messages to a child, such as sexting, pornography, etc. 6. Use any computers, cell phones, video cameras or social media to exploit or harass children, or to access, download or share child-abusive material. 7. Hire a child for work. 8. Encourage a child to meet outside the workplace. 9. Taking a child home. 10. Being alone with a child (there may be exceptions). 11. Doing personal things for children that they are capable of doing themselves. 12. Showing favouritism. 13. Being under the influence of alcohol or drugs while working with children. |

NOTIFICATION FORM
about a case of child abuse
or suspicion of it (please provide as much information as possible)

PART I

About the person providing the information (please note that the person providing the information should fill out the form together with the employee responsible for child protection in the organization)

| | |
|--|-------------------|
| FULL NAME | |
| Attitude to the child (parents, teacher, Caritas Ukraine personnel, classmate, etc.) | |
| Contact information | Phone: E-mail: |
| Date and time of notification (dd/mm/yyyy) | |
| Other authorities/structures that were notified (police, medical services, social services for children, others) | |

PART II

About the child

| | | | |
|--|---------------|----------------------------|-----|
| FULL NAME | | | |
| Sex (M/F) | | Date of birth (dd/mm/yyyy) | Age |
| Nationality | | | |
| Does the child belong to a minority group? | Yes (specify) | | No |
| Language spoken at home/school | | | |
| Do you have a disability/disadvantage? | Yes (specify) | | No |
| Address | | | |
| Contact information | | | |
| Whom does the child live with (parents, only mother/father, grandparents, aunt/uncle, older sister/brother, guardian, others?) | | | |
| Contact information of the main guardian | | | |

PART III

About suspected violence

| | |
|--|--|
| What gave rise to your suspicions? Did you witness the violence or suspect it? | |
|--|--|

| | |
|---|--|
| Has a prosecution been made? Did the child report the abuse? If so, how did they do so? | |
| Date, time and place of the incident | |
| Description of the situation/your observations | |
| Who else was involved (other children, parents, etc.)? | |
| What actions/measures were taken by you or others? How did you deal with the situation? | |

Please indicate what physical and/or psychological signs of violence were detected (check all that apply)

| | | | | | |
|----------------------|--|--|--|---|--|
| Fractures | | Damage in the genitals | | Dirty clothes | |
| Bruises | | Pregnancy | | Low level of hygiene | |
| Cuts | | Sexual behaviour | | Skipping school | |
| Bites | | Sexually transmitted diseases | | Begging/spending a significant amount of time on the street | |
| Scratches | | State of alcohol/drug intoxication | | Depression | |
| Burns | | Tuberculosis (or predisposition to it) | | Adult fearfulness | |
| Significant headache | | Hunger (malnutrition) | | Aggressive behaviour, nervousness | |
| Other (specify): | | | | | |

PART IV

About the suspected aggressor(s)

| | |
|--|--|
| FULL NAME | |
| Attitude towards the child (parents, teacher, etc.): | |
| Contact information (if known) | |
| Reason(s) for suspected violence | |

Signature of the reporting person

Signature of the Child Protection Officer

Date

Date

Donor notification template in case of violation of SEA policies and procedures

International Charitable Foundation "Caritas Ukraine"

Dear colleagues,

We would like to inform Bac that an incident occurred in the project _____ related to the violation of the policies and procedures of the Safeguarding System in the Caritas Ukraine network.

_____, in 2023, one of the feedback channels received and registered a sensitive appeal regarding a violation of the policy of protection against sexual exploitation and abuse. The incident occurred at the Charitable Organization "_____" with the participation of the beneficiary and/or the organization's personnel.

Please note that a sensitive appeal is handled in accordance with strict confidentiality rules. All information (which we have received or will receive in the future) will be treated in confidence and with a guarantee of non-persecution of the complainant, victim and accused.

We would like to remind you that all Safeguarding System Policies and Procedures, as well as the Procedure for Consideration of Sensitive Appeals, are available on our website and can be found at <http://caritas.ua/sfg/>.

We kindly ask you to provide us with a reply confirming the receipt of your message.

If you have any questions, please contact us at the contact information below.

Best regards,

Complaint Handler at Caritas Ukraine

Tel:

www.caritas.ua

International Charitable Foundation "Caritas Ukraine"

INFORMED CONSENT-CONFIRMATION
of a potential employee of the
Caritas Ukraine network
On non-involvement in cases of sexual exploitation and abuse

I, _____,
(last name, first name, patronymic)

as a candidate for the position of _____ in _____, I have been informed about the Caritas Ukraine Network Safeguarding System and the position of zero-tolerance to sexual exploitation and abuse I declare and confirm that during my employment I have not been involved in or been involved in cases of sexual abuse and exploitation.

International Charitable Foundation "Caritas Ukraine"

**INFORMED CONSENT-CONFIRMATION
of Project manager**

(Full name of the Responsible person)

I, _____,
(last name, first name, patronymic)

as the project manager of _____, I confirm that all employees and volunteers have signed the Code of Conduct for the Caritas Ukraine network.

Date

Signature

INTRODUCTION TO SAFEGUARDING POLICIES AND PROCEDURES
of the International Charitable Foundation "Caritas Ukraine"

I,

(indicate job title, section, department)

of the International Charitable Foundation "Caritas Ukraine", I am familiarized with and undertake to comply with all policies and procedures of the Safeguarding System, namely:

1. Code of Ethics of Caritas Ukraine.
2. Safeguarding Policy of Caritas Ukraine.
3. Anti-Corruption and Anti-Fraud Policy. Conflict of interest.
4. Procedure for handling of sensitive appeals and providing feedback to the Caritas Ukraine network.
5. Procedure for investigation in case of Safeguarding System breaches.

I am acquainted with the policies and procedures:

« _____ »

20 _____

(signature)

(Full name)

