



**APPROVED**  
**by the decision of the Management Board**  
**of NGO "RUKH Global"**  
**Minutes No. 3 dated "17" April 2026**



**Chairman of the Management Board**  
Igor DUDKA

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## **POLICY ON THE PREVENTION OF AND RESPONSE TO SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH) OF THE NON-GOVERNMENTAL ORGANIZATION "RUKH GLOBAL"**

| Parameter         | Value                                                            |
|-------------------|------------------------------------------------------------------|
| Version           | 1.0                                                              |
| Effective date    | from the moment of approval by the Management Board (April 2026) |
| Next review date  | no later than April 2028 (or ad hoc — see Section 14)            |
| Responsible owner | Executive Director of NGO "RUKH Global"                          |
| PSEAH Focal Point | appointed by order of the Executive Director (see clause 8.2)    |

## . General Provisions

### 1.1. Purpose of the Policy

1.1.1. The Non-governmental organization "RUKH Global" (hereinafter — the Organization, RUKH) adopts this Policy on the Prevention of and Response to Sexual Exploitation, Abuse and Harassment (Policy on Protection from Sexual Exploitation, Abuse and Harassment, hereinafter — the Policy or the PSEAH Policy) in order to ensure a safe environment for all persons with whom the Organization interacts: beneficiaries, members, employees, volunteers, contractors, partners and representatives of communities.

1.1.2. The Organization proclaims and adheres to the principle of zero tolerance towards sexual exploitation, abuse and harassment in all spheres of its activity.

1.1.3. The Policy is adopted in accordance with clause 1.4 of the Charter of NGO "RUKH Global" (principles of voluntariness, equality before the law, transparency and openness), clause 3.1 of the Charter (protection of the interests of the Ukrainian community), clause 3.2.6 of the Charter (provision of humanitarian assistance to members of the Organization), as well as in accordance with the powers of the Management Board (clause 5.4.4 of the Charter) and the Executive Director (clause 5.6 of the Charter) regarding the approval of internal regulatory acts.

1.1.4. The Policy is binding and forms an integral part of employment contracts, service contracts, volunteer agreements, partnership memoranda and any other forms of cooperation with the Organization.

### 1.2. Scope of Application

1.2.1. The provisions of this Policy apply to:

- full-time employees of the Organization (full-time, part-time, concurrent employment);
- members of the Organization — Full and Associate (clause 4.2 of the Charter);
- members of the Management Board, the Head of the Organization, the Executive Director, members of the Council (Section 6 of the Charter);
- volunteers engaged in the activities of the Organization on the basis of the Law of Ukraine "On Volunteer Activity" No. 3236-VI;
- persons cooperating under civil-law contracts (contractors, consultants, experts, trainers, facilitators, moderators);
- interns, trainees, persons on probation;
- partners in consortia and implementing partners (including sub-grantees);
- suppliers of goods and services when they interact with beneficiaries or personnel of the Organization;
- visitors and invited speakers at RUKH events;
- employees of separated subdivisions of the Organization (Section 9 of the Charter), including foreign ones (Poland and other countries).

1.2.2. The Policy protects:

- beneficiaries of RUKH programs and projects (in particular internally displaced persons, refugees, veterans, members of the diaspora, children and youth, persons with disabilities, the elderly, LGBTQ+ representatives);
- colleagues — employees, volunteers, members of the Organization;
- participants of cultural, educational and art-therapeutic events (clause 3.2.5 of the Charter);
- representatives of partner organizations, communities and donors.

1.2.3. The Policy applies on a 24/7 basis in all situations connected with the activities of the Organization: in offices, at events, on business trips, in online meetings, on social networks and messengers, outside working hours when a person represents RUKH, and also in the private life of personnel if their actions create a reputational or legal risk for the Organization or affect beneficiaries.

## 2. Regulatory Framework

2.1. The Policy has been developed taking into account the current wordings of the following international and national acts as of April 2026.

### 2.2. International Standards and UN Documents

- UN Secretary-General's Bulletin ST/SGB/2003/13 "Special measures for protection from sexual exploitation and sexual abuse" — the foundational UN standard that introduced the six core prohibitions (Six Core Principles).

- IASC Six Core Principles Relating to Sexual Exploitation and Abuse (Inter-Agency Standing Committee, 2002, reaffirmed 2019) — mandatory principles for all partners of UN humanitarian operations.
- UN Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse (2019) and UN Protocol on Allegations of Sexual Exploitation and Abuse involving Implementing Partners (2018) — standards on victim-centered assistance and UN cooperation with partners.
- Core Humanitarian Standard (CHS) Commitment 5 — "Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints".
- Accountable Now Accountability Framework — commitments regarding safeguarding and complaints (Commitment 10).
- UN Convention on the Rights of the Child (1989) and UN CEDAW — international treaties ratified by Ukraine.
- ILO Convention No. 190 on the Elimination of Violence and Harassment in the World of Work (2019).
- Istanbul Convention — Council of Europe Convention on preventing and combating violence against women and domestic violence (ratified by Ukraine in 2022).

### 2.3. Donor Requirements

- EU Financial Regulation (EU, Euratom) 2024/2509 of 23.09.2024 (effective from 30.09.2024) — contains requirements for beneficiaries of EU grants regarding protection of personal integrity and prevention of harassment.
- Creative Europe Programme Guide (2025) — requirement for partners to have a safeguarding / PSEAH policy in place.
- Horizon Europe Model Grant Agreement — Article 14 (Code of Conduct) and Annex 5 on safeguarding.
- UN Partner Portal Due Diligence — mandatory PSEA self-assessment for partners of UNICEF, UNFPA, UNHCR, WFP, IOM and others.
- Sida Anti-Harassment, Sexual Harassment and Bullying Policy, GIZ Safeguarding Policy, FCDO Enhanced Due Diligence on Safeguarding — conditions of grants from other donors.

### 2.4. Legislation of Ukraine

- Constitution of Ukraine — Article 3 (a human being, their life and health — the highest social value), Articles 21, 24, 28.
- Criminal Code of Ukraine: Article 149 (human trafficking), Article 152 (rape), Article 153 (sexual violence), Article 154 (compulsion to sexual intercourse), Article 155 (sexual intercourse with a person who has not reached sixteen years of age), Article 156 (corruption of minors), Article 156-1 (solicitation of a child), Articles 301-1, 301-2 (materials depicting sexual abuse of a child), Article 126-1 (domestic violence), Article 161 (discrimination).
- Law of Ukraine "On Preventing and Countering Domestic Violence" of 07.12.2017 No. 2229-VIII.
- Law of Ukraine "On Ensuring Equal Rights and Opportunities for Women and Men" of 08.09.2005 No. 2866-IV (Article 1 — definition of sexual harassment).
- Law of Ukraine "On the Principles of Preventing and Combating Discrimination in Ukraine" of 06.09.2012 No. 5207-VI.
- Law of Ukraine "On Protection of Childhood" No. 2402-III; Law of Ukraine "On Combating Human Trafficking" No. 3739-VI.
- Labour Code of Ukraine — Article 21 (prohibition of discrimination), Article 2-1, Articles 40, 41 (grounds for termination of an employment contract), Article 235 (reinstatement at work).
- Law of Ukraine "On Public Associations" No. 4572-VI in the wording as of 03.09.2024 — Article 21 (rights) and Article 23 (reporting).
- Law of Ukraine "On Personal Data Protection" No. 2297-VI and GDPR (EU 2016/679) — as regards the processing of data on complaints and survivors.
- Law of Ukraine "On Volunteer Activity" No. 3236-VI.

## 3. Key Terms and Definitions

3.1. In this Policy, the terms shall have the following meanings:

**Sexual exploitation** — any actual abuse or attempted abuse of a position of vulnerability, power, trust or differential of power for sexual purposes — including to obtain monetary, social, political or any other benefit. This includes, in particular, the exchange of humanitarian/grant aid, employment, programme benefits or participation in activities for sexual services.

**Sexual abuse** — any actual or threatened physical intrusion of a sexual nature committed by force or under unequal or coercive conditions. Any sexual act with a child (a person under 18 years of age) qualifies as sexual abuse — regardless of the child's consent or the legally established age of sexual consent in the country where such act took place.

**Sexual harassment** — unwanted conduct of a sexual nature — verbal, non-verbal, physical or digital — that violates a person's dignity and creates an intimidating, hostile, degrading, humiliating or offensive environment. It includes quid pro quo (exchange of services for sexual acts) and hostile environment harassment. The definition is aligned with Article 1 of Law of Ukraine No. 2866-IV.

**Abuse / maltreatment** — all forms of physical and psychological violence, insult, humiliation, discrimination, bullying, neglect, careless and brutal treatment, exploitation, stalking — including online manifestations.

**Beneficiary** — a natural person or a group of persons who receive support, services, products or participate in the Organization's projects; the concept also covers persons applying for assistance.

**Vulnerable group** — persons who, due to age, gender, health condition, social or legal status, experience of trauma, language, migration status or other factors, have a reduced capacity to protect their own rights. For RUKH these are primarily children and youth, internally displaced persons (IDPs) and refugees, veterans and war-affected persons, persons with disabilities, the elderly.

**PSEAH Focal Point** — an authorized officer of the Organization responsible for receiving reports, coordinating the primary response, maintaining a confidential register of incidents, and communicating with the PSEAH Committee and external partners.

**PSEAH Committee** — a collegial body established for the consideration of complaints, coordination of investigations and adoption of recommendations; composition — see clause 8.3.

**Survivor** — a person who has experienced sexual exploitation, abuse or harassment; the term "survivor" is used instead of "victim" to emphasize agency and the right to recovery.

**Victim-centered / survivor-centered approach** — the principle according to which the needs, safety, well-being, rights, dignity and choice of the survivor are decisive at all stages of case handling.

**"Do no harm"** — the principle that obliges all participants in the process to foresee and minimize possible harm from their actions or inaction, in particular re-traumatization of survivors.

**CBCM (Community-Based Complaint Mechanism)** — a complaint mechanism accessible to communities and beneficiaries: in various languages, through various channels (offline/online), without discrimination, with a guarantee of confidentiality.

**Bystander intervention** — active behaviour of a witness who notices unacceptable conduct and takes measures to stop or prevent it in a safe manner.

**Retaliation** — any negative action against a person who has reported a violation or assisted in its investigation (dismissal, transfer, reduction of remuneration, isolation, pressure).

## 4. Prohibited Conduct

### 4.1. Six Core Prohibitions (IASC Six Core Principles)

4.1.1. All persons to whom the Policy applies are obliged to adhere to the six core principles:

- Sexual exploitation and sexual abuse constitute a serious violation, grounds for termination of cooperation and may constitute a crime.
- Any sexual activity with a child (a person under 18 years of age) is prohibited — regardless of the local age of consent; mistake regarding age does not exempt from liability.
- The exchange of money, employment, goods, services, programme assistance for sexual services — including sex for money or humiliating forms of behaviour — is prohibited.
- Sexual relations between personnel of the Organization and beneficiaries are strongly discouraged and are treated as abuse of power; such conduct undermines trust.
- Where a person has a reasonable suspicion or possesses information about the commission of sexual exploitation, abuse or harassment by a colleague — they are obliged to report to the PSEAH Focal Point without delay.
- Management is obliged to create and maintain an environment that prevents sexual exploitation and abuse.

## 4.2. Specific Examples of Prohibited Conduct

### 4.2.1. Prohibited conduct includes, in particular:

- any sexual intercourse, sexual contacts or sexualized acts involving a child (under 18 years);
- offer, promise or provision of money, food, employment, housing, programme participation in exchange for sexual services;
- coercion, threats, blackmail, "exchange of favours" (quid pro quo) — including by a manager towards a subordinate;
- unwanted touching, kisses, hugs of a sexual nature; blocking an exit or keeping a person in a room;
- indecent jokes, comments, anecdotes of a sexual nature in the workplace, in work chats or on social networks;
- sexual innuendos, ambiguous "compliments", questions about a person's intimate life, relationship status, appearance;
- distribution, display or facilitation of access to pornographic materials in work channels;
- use of corporate resources (email, Slack, Teams, Monday, Google Drive) for sexualized content;
- cyber-harassment: sending intimate photos without consent, non-consensual intimate imagery (image-based abuse), "dick pics", deepfake content;
- stalking — persecution in physical and digital space, in particular through geolocation applications;
- grooming — establishing an emotional bond with a child or other vulnerable person for the purpose of subsequent exploitation;
- bullying, mobbing related to sex, gender identity, sexual orientation;
- refusal to recognize a colleague's gender identity; systematic weaponized misgendering;
- any conduct that creates a "hostile environment" and interferes with the performance of duties.

## 4.3. Obligations of Leaders

4.3.1. The Head of the Organization, the Chairman of the Management Board, members of the Management Board, the Executive Director, project managers and heads of separated subdivisions (Section 9 of the Charter) are additionally obliged to:

- not use power, authority or control over resources to obtain personal benefit of a sexual nature;
- model respectful behaviour by their own example;
- immediately respond to any signals of inappropriate conduct;
- not allow cover-up of incidents.

# 5. Obligations of the Organization

## 5.1. Safe Recruitment and Screening

### 5.1.1. The Organization undertakes to implement safe recruitment procedures:

- job vacancies and volunteer recruitment announcements include a clause on mandatory adherence to the PSEAH Policy;
- the recruitment process includes behavioural interview questions on safeguarding;
- at least two reference checks from previous places of work/volunteering are verified;
- checks are performed against open registers, including the Register of Persons Convicted of Crimes Against Sexual Freedom/Inviolability, to the extent permitted by law;
- for positions involving work with children and vulnerable groups, a "Certificate of No Criminal Record" is required (Ministry of Internal Affairs of Ukraine, form No. 6); for foreign citizens — an equivalent document (DBS check in the United Kingdom, KRK in Poland, etc.);
- checks against EU, UN, and OFAC SDN sanctions lists are performed;
- the candidate declares the absence of open criminal proceedings and sanctions imposed for sexual offences;
- signing of the Code of Conduct (Annex A) is a condition of employment/engagement in volunteer or contractor activity.

## 5.2. Induction and Training

5.2.1. The Organization conducts mandatory induction training on PSEAH for every new employee, volunteer or contractor within 14 calendar days from the start of cooperation.

5.2.2. All employees and core volunteers undergo refresher PSEAH training at least once per calendar year (see Annex E — Training curriculum outline).

5.2.3. For managers, the Focal Point and members of the PSEAH Committee, an in-depth training "PSEAH investigation & victim-centered approach" of at least 8 academic hours is conducted.

### 5.3. Code of Conduct Signing

5.3.1. All persons to whom the Policy applies sign the Code of Conduct declaration form (Annex A). The signed original is kept in the personnel file, and a scanned copy — in the Organization's secure HRM system.

5.3.2. Contracts with partners (consortium agreements, sub-grant contracts, service contracts) shall mandatorily include a "Safeguarding & PSEAH clause" — a reference to this Policy, a requirement to have or introduce an equivalent policy, and a commitment to report SEA incidents.

### 5.4. Safe Programming

5.4.1. When planning events (festivals, art residencies, trainings, educational programs for youth, community events for the diaspora), the Organization conducts a Safeguarding Risk Assessment (SRA) — a written PSEAH risk assessment that includes: participant profile, vulnerable groups, environment, reporting channels, presence of a Focal Point.

5.4.2. When working with children and youth, additional rules apply: the "two-adult rule" (not fewer than two adults present at the same time), the "open door rule", and a prohibition on solo private meetings outside the work setting.

### 5.5. Visibility of Information

5.5.1. A short version of this Policy (1–2 pages, in Ukrainian and English, visualized) and reporting contacts shall be placed:

- on the official website rukh.global (section "About / Safeguarding");
- in all offices and at the events of the Organization (poster, infographic);
- in the welcome pack of a new employee/volunteer;
- in materials distributed to beneficiaries, adapted to the linguistic needs of the audience (Ukrainian, English, Polish, if necessary — with pictograms for children).

## 6. Obligations of Personnel

### 6.1. Duty to Report

6.1.1. Every person to whom the Policy applies has a duty to report any case of sexual exploitation, abuse, harassment or maltreatment if they:

- witnessed such conduct;
- have a reasonable suspicion;
- received a report from a survivor;
- discovered materials indicating the commission of such acts.

6.1.2. The report shall be made without delay, within 24 hours of becoming aware of the incident, through one of the channels specified in Section 7.

6.1.3. Failure to fulfil the duty to report (silence / cover-up) in itself constitutes a violation of the Policy and may be grounds for disciplinary action up to and including termination of the employment contract.

### 6.2. Bystander Intervention

6.2.1. The Organization encourages active bystander behaviour in accordance with the "5D" model:

- Distract — divert the offender's attention (interrupt the dialogue, ask "what time is it");
- Delegate — involve another person (manager, security, Focal Point);
- Document — under safe circumstances, record the facts (time, place, witnesses);
- Delay — after the incident, approach the survivor, offer support, provide information about support channels;
- Direct — directly tell the offender that such conduct is unacceptable (only if safe).

6.2.2. Intervention is carried out in such a way as not to endanger the survivor or the bystander themselves. The "do no harm" principle takes precedence over the desire to "save the situation".

### 6.3. Confidentiality Obligations of Personnel

6.3.1. Persons who have received information about an incident are obliged to:

- maintain confidentiality — not disseminate information beyond the Focal Point and the PSEAH Committee;



- not question the survivor about the details of the incident beyond what is necessary for primary assistance and referral to the Focal Point;
- not disclose the identity of the survivor or the alleged perpetrator in the public space or on social networks.

## 7. Reporting Mechanism (CBCM)

### 7.1. CBCM Principles

7.1.1. The Organization's complaint mechanism complies with the principles of a Community-Based Complaint Mechanism:

- accessibility — several channels (online, telephone, offline, in person), free of charge, without bureaucratic barriers;
- confidentiality — limited circle of persons with access to materials, secure storage, GDPR compliance;
- safety — guarantee against retaliation, possibility of anonymous submission;
- independence — availability of an external independent channel if the alleged perpetrator is a senior official of the Organization;
- adaptability — different languages (Ukrainian, English, Polish), accessible formats (easy-to-read language, pictograms for children);
- accountability — the complainant receives confirmation of receipt of the complaint and information about case progress (without disclosure of confidential details).

### 7.2. Complaint Submission Channels

| Channel            | Description and contacts                                                                                                                                                                                                                                                                                                                           |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Email (secure)     | safeguarding@rukhh.global — monitored solely by the PSEAH Focal Point; access restricted by IAM policy                                                                                                                                                                                                                                             |
| Hotline            | +380 XX XXX XX XX (24/7 with voicemail option); +48 XX XXX XX XX (for Poland)                                                                                                                                                                                                                                                                      |
| Online form        | rukhh.global/safeguarding/report — with an option for anonymous submission, SSL support and storage of metadata in an encrypted repository                                                                                                                                                                                                         |
| Drop-box (offline) | locked complaint boxes at the main office of the Organization and at each major event (opened solely by the Focal Point)                                                                                                                                                                                                                           |
| In-person meeting  | by prior appointment with the Focal Point at a convenient location (may be outside the office, in the presence of a trusted person)                                                                                                                                                                                                                |
| External channel   | if the complaint concerns the Focal Point, a member of the Management Board, the Head of the Organization or the Executive Director — the complaint is submitted to an independent external ombudsman / ethics hotline whose contact is published on the website; as an alternative — direct contact with the donor or law enforcement authorities |
| WhatsApp / Signal  | for tech-savvy users, with a caveat on confidentiality limitations; number +380 XX XXX XX XX                                                                                                                                                                                                                                                       |

### 7.3. Content of a Complaint

7.3.1. A complaint may be submitted in free form or using the form in Annex B. The minimum desired elements are:

- description of the event (what happened) — in one's own words, without an obligation to detail;
- approximate time and location;
- identity of the alleged perpetrator (if known);
- whether the complainant personally is the survivor, or another person, or a child;
- whether there are witnesses;
- contact details of the complainant (optional — may be anonymous);
- actions already taken (visiting a doctor, police, etc.).

### 7.4. Anonymity

7.4.1. Anonymous reports are accepted and considered on a mandatory basis. The Organization makes every effort to investigate, but understands that the absence of contact data limits the possibility of additional questions to the complainant.

7.4.2. Pseudonyms (code-name markers) are permitted: the complainant may choose a pseudonym for further communication, keeping their identity confidential.

## 7.5. Non-Retaliation Guarantee

7.5.1. The Organization categorically prohibits any form of retaliation against a person who in good faith has submitted a report or cooperated with an investigation. Retaliation qualifies as a separate serious violation of the Policy.

7.5.2. Persons who have suffered retaliation have the right to submit a separate report. They shall be provided with temporary protective measures — transfer to another project, temporary release from contact with the alleged perpetrator, etc.

7.5.3. Abuse of the mechanism — the deliberate submission of a knowingly false report — entails liability. At the same time, an unsuccessful or not fully substantiated complaint submitted in good faith does not constitute abuse.

## 8. Handling of Complaints

### 8.1. Roles in the Handling Process (RACI)

| Action                                                       | R (Responsible)                       | A (Accountable)                                                             | C (Consulted)                  | I (Informed)                              |
|--------------------------------------------------------------|---------------------------------------|-----------------------------------------------------------------------------|--------------------------------|-------------------------------------------|
| Receiving the complaint                                      | PSEAH Focal Point                     | Executive Director                                                          | Lawyer, PSEAH Committee        | Chairman of the Management Board          |
| Risk assessment and primary safety measures for the survivor | Focal Point                           | Executive Director                                                          | Partner support organizations  | PSEAH Committee                           |
| Investigation                                                | PSEAH Committee / external expert     | Executive Director or (if concerning them) Chairman of the Management Board | Lawyer, HR                     | Donor (in case of "mandatory disclosure") |
| Decision on sanctions                                        | Executive Director / Management Board | Management Board                                                            | Lawyer                         | Focal Point, HR                           |
| Support of the survivor                                      | Focal Point + partner organizations   | Executive Director                                                          | Medical/psychological services | PSEAH Committee                           |
| Reporting to donors                                          | Executive Director                    | Management Board                                                            | Lawyer                         | Focal Point                               |

### 8.2. PSEAH Focal Point

8.2.1. The PSEAH Focal Point is appointed by order of the Executive Director from among the employees of the Organization (it is recommended that the person be from the HR or programme service with appropriate training).

8.2.2. As a safeguard: the Focal Point may not hold a position that creates a conflict of interest (e.g., direct subordination to the line managers of potential perpetrators).

8.2.3. With consent, a Deputy Focal Point is appointed, who acts in the event of leave, absence or conflict of interest of the Focal Point.

8.2.4. The contact of the Focal Point is published on the website and in the office materials of the Organization.

### 8.3. PSEAH Committee

8.3.1. The PSEAH Committee is established as a standing body consisting of 3–5 persons:

- Executive Director (Chair of the Committee) — or the Chairman of the Management Board, if the complaint concerns the Executive Director;
- PSEAH Focal Point;
- Organization's lawyer or external legal consultant;
- representative of the HR service;
- external independent expert (if needed — a psychologist, a specialist in gender-based violence).



8.3.2. Decisions of the Committee are adopted by a simple majority of votes; recommendations are forwarded to the Management Board (in serious cases) or to the Executive Director for the final decision.

8.3.3. Members of the Committee sign a separate non-disclosure agreement (NDA) and a declaration on the absence of conflict of interest for each specific case.

## 8.4. Timeframes

| Stage                                                              | Deadline                                                       | Note                                                                                         |
|--------------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| Acknowledgement of receipt of the complaint to the complainant     | within 24 hours                                                | automatic or manual notification (if contact is available)                                   |
| Initial risk assessment and safety measures                        | within 48 hours                                                | triage assessment: threat to life / health → immediate actions                               |
| Establishment of the PSEAH Committee (if the incident so requires) | within 5 working days                                          | in case of conflict of interest — replacement of members                                     |
| Main investigation                                                 | within 30 calendar days                                        | with the possibility of extension to 60 days upon justification; the complainant is informed |
| Decision-making and application of sanctions                       | within 10 working days after completion of the investigation   | formalized by a decision of the Management Board / order of the Executive Director           |
| Communication of results to the complainant                        | within 5 working days after the decision                       | within the limits that do not violate confidentiality regarding the alleged perpetrator      |
| Mandatory disclosure to the donor                                  | in accordance with the terms of the grant, usually 24–72 hours | for UN, EU grants — as per the grant agreement                                               |

## 8.5. Investigation Principles

- survivor-centered — the safety, well-being and choice of the survivor take priority;
- do no harm — avoid re-traumatization, unnecessary questions, contact with the alleged perpetrator without the survivor's consent;
- presumption of innocence — in respect of the person who is the subject of the complaint, until the completion of the investigation;
- confidentiality — limited circle of persons, GDPR compliance, secure document storage;
- fair process — the right of persons to become familiar with the accusations and to provide explanations;
- documentation — all steps are recorded in writing in a secure incident register;
- multidisciplinary — external experts are involved in complex cases.

## 8.6. Interim Measures

8.6.1. Prior to the completion of the investigation, for the sake of the safety of survivors and the integrity of the process, interim measures may be taken with regard to the person who is the subject of the complaint:

- suspension from project activity while retaining status;
- restriction of access to the Organization's premises / events;
- prohibition of contact with the survivor (no-contact order);
- transfer under direct subordination to the Executive Director.

8.6.2. Interim measures are not a punishment but a preventive tool.

# 9. Support of Survivors

## 9.1. Principles of Support

9.1.1. The Organization guarantees survivors comprehensive support on the following principles:

- survivor-centered — priority of the survivor's needs, safety and choice;
- free of charge — the Organization covers initial expenses for emergency assistance within its means;
- comprehensiveness — medical, psychosocial, legal support is provided in a coordinated manner;

- respect for choice — the survivor decides whether to contact the police; the Organization informs but does not compel (except where the survivor is a child: in such a case Article 19-1 of the Law of Ukraine "On Protection of Childhood" and the provisions of the Criminal Procedure Code apply);
- non-discrimination — support is provided regardless of sex, age, sexual orientation, citizenship, migration status.

## 9.2. Partner Support Organizations

9.2.1. The Organization concludes memoranda of cooperation and updates the list of verified partners (see Annex D — Support Contacts). Recommended partners:

- "La Strada-Ukraine" — National hotline for the prevention of domestic violence, human trafficking and gender discrimination: 0 800 500 335 (from mobile — 116 123), psychological and legal aid;
- NGO "Poruch" — psychological support during the period of war; online sessions in Ukrainian;
- National hotline for children and youth — 0 800 500 225 / 116 111;
- National hotline for combating domestic violence — 15 47 (from any phone in Ukraine, 24/7);
- National Police of Ukraine — 102; juvenile prevention units;
- Social Services Centres — at the place of residence of the IDP or beneficiary;
- Feminoteka (Poland) — for Ukrainian women in Poland: 888 883 388;
- Niebieska Linia (Poland) — 800 120 002;
- Medical institutions — the nearest hospitals with post-exposure prophylaxis (PEP) protocols and forensic evidence collection in cases of sexual violence.

## 9.3. Types of Support

- Medical — referral to a medical facility, accompaniment, transport assistance; in cases of sexual violence — request for post-exposure prophylaxis and samples for forensic examination (within the first 72 hours);
- Psychosocial — access to a psychologist or psychotherapist, including online; acceptance of the fact that the survivor may choose support a long time after the event;
- Legal — information on rights, contacts of free legal aid, accompaniment in contacting law enforcement authorities;
- Safety — temporary shelter through partner shelters; digital safety measures; change of work schedule, place of work;
- Workplace accommodation — paid leave due to trauma (up to 10 working days, or more at the decision of the Executive Director), change of project, revision of KPIs;
- Follow-up — regular contacts by the Focal Point for at least 6 months after the incident (with a frequency acceptable to the survivor).

## 9.4. Specifics of Working with Children

9.4.1. If the survivor is a child (under 18 years of age):

- immediate involvement of the Service for Children's Affairs and the juvenile prevention units of the National Police;
- informing the parents/legal representatives (except in cases where they are themselves the alleged perpetrators);
- application of the "Barnahus" protocol — if available in the region;
- limiting the number of interviews with the child, coordination with the juvenile prosecutor;
- all actions — taking into account the best interests of the child (Convention on the Rights of the Child, Article 3).

## 10. Sanctions

10.1. For violations of the PSEAH Policy, the following sanctions are applied (depending on the gravity, circumstances, recurrence):

### 10.2. For Employees

- oral warning (for minor, non-recurring violations, e.g., an inappropriate joke — with mandatory additional training);
- written reprimand order;
- deprivation of bonuses, premium payments, the right to represent the Organization at external events;
- transfer to another position / removal from managerial functions;

- termination of the employment contract at the initiative of the employer (Articles 40, 41 of the Labour Code of Ukraine — in particular clause 3 of part 1 of Article 41 of the Labour Code concerning guilty acts which became grounds for loss of confidence);
- transfer of materials to the law enforcement authorities of Ukraine / Poland / another jurisdiction as per jurisdiction.

### 10.3. For Volunteers, Contractors, Consultants

- oral or written warning with a note in the volunteer's file;
- temporary or permanent suspension from activity;
- termination of the service contract / volunteer agreement — without payment of compensation for the unexecuted period in case of serious violations;
- inclusion in the Organization's internal "blacklist" (in compliance with GDPR requirements for the processing of personal data);
- informing partner organizations within the limits of GDPR norms (at the decision of the PSEAH Committee).

### 10.4. For Members of the Organization

- warning from the Management Board;
- exclusion from membership of the Organization by decision of the Management Board in accordance with clause 4.10.1 of the Charter (repeated violations of the requirements of the Charter / internal policies);
- appeal against the decision is carried out in accordance with Section 7 of the Charter.

### 10.5. For Partner and Implementing Organizations

- demand for immediate suspension of the activity of the person involved;
- termination of the partnership / sub-grant contract without payment of further tranches;
- demand for the return of funds in case of grant misuse;
- notification of the donor in accordance with mandatory disclosure rules (e.g., EU FR 2024/2509, UN Supplier Code of Conduct).

### 10.6. For Leadership

10.6.1. If the violation has been committed by the Head of the Organization, the Chairman of the Management Board, the Executive Director or a member of the Management Board — the decision is adopted by the Management Board without the participation of the person concerned, and in serious cases — by the General Meeting in accordance with clause 5.3.5.7 of the Charter (on dismissal of the Head of the Organization) or clause 5.3.5.6 of the Charter (on dismissal of members of the Management Board).

### 10.7. Criminal Prosecution

10.7.1. If the facts established in the course of the internal investigation may contain elements of a crime under the Criminal Code of Ukraine (Articles 149, 152, 153, 154, 155, 156, 156-1, 301-1, 301-2 and others), the Organization is obliged to:

- immediately inform the National Police of Ukraine (Article 60 of the Constitution, Article 214 of the Criminal Procedure Code of Ukraine);
- not obstruct the collection of evidence;
- provide the witness-survivor with support at all stages of the criminal proceedings;
- inform donors within its contractual obligations.

## 11. Prevention and Training

### 11.1. Mandatory Training

11.1.1. All persons to whom the Policy applies undergo basic PSEAH training (not less than 2 hours) within the first 14 days of cooperation and update it annually (refresher — not less than 1 hour).

11.1.2. Training content (see Annex E):

- overview of the Policy and applicable legal norms;
- IASC Six Core Principles;
- examples of prohibited conduct;
- victim-centered approach, do no harm;

- how to recognize an incident, bystander intervention;
- reporting channels, non-retaliation guarantee;
- self-control and cultural competence.

## 11.2. Specialized Trainings

- for managers — "Leadership in PSEAH";
- for the Focal Point and Committee members — "PSEAH investigation";
- for persons working with children and youth — "Child safeguarding";
- for employees interacting with beneficiaries on business trips abroad — "Cultural sensitivity in safeguarding";
- for event volunteers — a short briefing before the start of each event.

## 11.3. Training Record Keeping

11.3.1. The HR service maintains a centralized register of training participation (date, topic, trainer, participants, post-test results). Certificates are kept in the personnel file. The register is available for donor audits.

## 11.4. Communication and Cultural Work

- updating of communication materials (posters, landing pages) at least once every 18 months;
- quarterly discussion of safeguarding issues at team meetings;
- active participation in the 16 Days of Activism against Gender-Based Violence (25 November — 10 December);
- integration of safeguarding principles into the design of every cultural/educational programme at the planning stage.

# 12. Monitoring and Reporting

## 12.1. Incident Register

12.1.1. The Focal Point maintains a confidential PSEAH Incident Register in a secure system. Fields: ID, date of receipt, channel, status (received / under investigation / resolved), severity level, sanctions, date of closure.

12.1.2. The Register is retained for at least 7 years after the closure of the case; personal data are processed in accordance with the GDPR and Law of Ukraine No. 2297-VI (legal basis — legitimate interest in establishing facts of violations and protecting survivors).

## 12.2. Annual Report

12.2.1. The Executive Director annually submits to the Management Board an aggregated PSEAH report (without personal data) for the previous year, which includes:

- number of reports received by channels;
- number of substantiated cases, sanctions, terminated contracts;
- duration of handling (average, maximum);
- number of trainings and coverage of personnel;
- implemented recommendations from previous reports;
- improvement plan.

## 12.3. Reports to Donors

12.3.1. The Organization reports to donors in accordance with the terms of the grant agreements (EU Financial Regulation 2024/2509, Horizon Europe MGA, UN Agreements, etc.), including:

- availability and version of the Policy;
- results of SRA for projects within the grant;
- number of incidents and measures taken (without disclosure of personal data);
- mandatory disclosure in case of serious incidents within the timeframes defined by the grant.

## 12.4. External Audit

12.4.1. At least once every 3 years the Organization commissions an external independent audit of the safeguarding / PSEAH system, which includes an assessment of culture, procedures, channels, training, personnel surveys.

## 13. Responsibility

13.1. The Chairman of the Management Board bears overall responsibility for the implementation of the Policy, ensuring resources and a culture of zero tolerance.

13.2. The Executive Director is the owner of the Policy (policy owner), organizes its implementation, approves instructions, appoints the Focal Point and members of the Committee, and submits the annual report to the Management Board.

13.3. The PSEAH Focal Point is responsible for the functioning of the CBCM, receiving reports, coordinating support for survivors, maintaining the Incident Register, and executing the decisions of the Committee.

13.4. Project managers are responsible for conducting the Safeguarding Risk Assessment, integrating safeguarding rules into projects, and monitoring compliance.

13.5. The HR service is responsible for implementing safe recruitment, keeping records of trainings, and obtaining signatures on the Code of Conduct.

13.6. Every employee, volunteer, contractor and member of the Organization is responsible for their own conduct, adherence to the Policy, duty to report and bystander intervention.

## 14. Final Provisions

14.1. The Policy enters into force from the moment of its approval by the Management Board of the Organization.

14.2. This Policy is reviewed at least once every 2 years. An ad hoc review is carried out in the following cases:

- material changes to the statutory documents of the Organization;
- entry into force of new legislation of Ukraine or the EU affecting the subject matter of the Policy;
- introduction of new requirements by key donors (EU, UN, Sida, GIZ);
- a serious incident that has pointed to systemic deficiencies;
- upon recommendation of an external safeguarding audit.

14.3. In the event of a conflict between the provisions of this Policy and the Charter of the Organization — the Charter prevails. In the event of a conflict between the Policy and other internal policies — priority is given to the provision that ensures a greater level of protection of survivors.

14.4. In the event of a conflict with the legislation of Ukraine — the legislation applies. In the event of operations outside Ukraine (Poland, EU, other countries) — the norms of the country of operation apply if they ensure a higher level of protection.

14.5. The Policy is disseminated among personnel through the corporate communication system; updates are announced with an indication of the date of entry into force.

14.6. This Policy and all its annexes form a single whole. The annexes are approved simultaneously with the main text of the Policy and may be updated by the Executive Director in the course of work without re-approval of the entire Policy — provided that the update does not change the fundamental requirements.

## 15. Mapping "RUKH Policy → Donor Requirements"

| Policy Provision                          | EU (2024/2509, CE, HE) | UN (UNPP, ST/SGB)                 | Sida | GIZ / FCDO |
|-------------------------------------------|------------------------|-----------------------------------|------|------------|
| Zero-tolerance (Section 1)                | X                      | X                                 | X    | X          |
| IASC Six Core Principles (clause 4.1)     | X                      | X (mandatory)                     | X    | X          |
| Safe recruitment + screening (clause 5.1) | X                      | X                                 | X    | X          |
| Mandatory PSEAH training (Section 11)     | X                      | X                                 | X    | X          |
| CBCM with anonymous channel (Section 7)   | X                      | X                                 | X    | X          |
| Victim-centered support (Section 9)       | X                      | X (UN Victim Assistance Protocol) | X    | X          |

|                                       |                   |                      |   |   |
|---------------------------------------|-------------------|----------------------|---|---|
| Mandatory disclosure (Section 12)     | X (EU FR Art. 36) | X (UN Protocol 2018) | X | X |
| Non-retaliation (clause 7.5)          | X                 | X                    | X | X |
| Child safeguarding (clauses 4.2, 9.4) | X                 | X (CRC)              | X | X |
| Annual PSEAH report (clause 12.2)     | X                 | X                    | X | X |
| External audit (clause 12.4)          | X                 | recommended          | X | X |



## Annex A. PSEAH Code of Conduct Declaration Form

*(to be completed and signed by every employee, volunteer, member of the Organization, contractor, consultant and partner at the start of cooperation)*

I, \_\_\_\_\_ (full name),  
 position / role: \_\_\_\_\_,  
 subdivision / project: \_\_\_\_\_,

hereby confirm that:

- I have read the Policy on the Prevention of and Response to Sexual Exploitation, Abuse and Harassment (PSEAH) of NGO "RUKH Global" and all its annexes;
- I understand the six core IASC prohibitions and the list of prohibited conduct (Section 4 of the Policy);
- I undertake to adhere to the principle of zero tolerance and not to commit, condone or conceal any act falling within the definition of sexual exploitation, abuse, harassment or maltreatment;
- I undertake to fulfil the duty to report — to immediately (within 24 hours) notify the PSEAH Focal Point of any facts or reasonable suspicions of which I have become aware;
- I understand that violation of the Policy constitutes grounds for disciplinary action, termination of the employment / civil-law / volunteer contract, consideration of the question of expulsion from membership of the Organization, and in cases provided for by law — grounds for criminal liability;
- I will undergo mandatory PSEAH training within the established deadlines;
- when working with children (persons under 18 years of age) and vulnerable groups, I will comply with additional rules (clauses 5.4, 9.4 of the Policy) — the two-adult rule, the open door rule, and the prohibition of private meetings outside the work setting;
- I consent to the processing of my personal data to the extent necessary for the implementation of the Policy (verification of references, certificates, training records, etc.) in accordance with the GDPR and Law of Ukraine No. 2297-VI.

**Declaration concerning past facts:** I confirm that as of the date of signing I am not under investigation, I have no open criminal proceedings or unexpunged convictions for offences in the sphere of sexual freedom, sexual inviolability, human trafficking, domestic violence. During the past 10 years I have not been dismissed from previous places of employment or volunteering in connection with violation of safeguarding / PSEAH rules.

I understand that the provision of false information in this declaration constitutes grounds for immediate termination of cooperation.

Date: " \_\_\_\_ " \_\_\_\_\_ 20 \_\_\_\_ .

Signature: \_\_\_\_\_ Full name: \_\_\_\_\_

Confirmation of receipt by the Organization:

PSEAH Focal Point: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Annex B. PSEAH Complaint Form

*Confidential — access is restricted to the PSEAH Focal Point and the PSEAH Committee. The form may be completed anonymously.*

### B.1. Information about the Complainant (optional)

Full name: \_\_\_\_\_

Role within RUKH (employee / volunteer / beneficiary / partner / other): \_\_\_\_\_

Contacts (email / telephone / pseudonym): \_\_\_\_\_

Preferred method of communication: ☐ email ☐ telephone ☐ in-person meeting ☐ no feedback desired

### B.2. Who Was Harmed

☐ I personally ☐ another person ☐ a child (< 18 years) ☐ a group of persons

If known — full name and contact details of the survivor: \_\_\_\_\_

### B.3. Who Is the Subject of the Complaint (if known)

Full name / description: \_\_\_\_\_

Role / status within RUKH or outside it: \_\_\_\_\_

### B.4. Description of the Event

Date / period: \_\_\_\_\_

Location (physical / online): \_\_\_\_\_

Description of what happened (in your own words; detailed elaboration not mandatory):

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### B.5. Witnesses

Were there witnesses? ☐ yes ☐ no ☐ I do not know

If yes — full names / contact details: \_\_\_\_\_

### B.6. Actions Already Taken

☐ visited a doctor ☐ contacted the police ☐ shared with close ones

☐ have not contacted anyone ☐ other: \_\_\_\_\_

### B.7. What I Expect from the Organization

☐ investigation ☐ temporary safe distance from the person ☐ psychological support

☐ medical assistance ☐ legal consultation ☐ assistance in contacting the police

☐ other: \_\_\_\_\_

### B.8. Safety

Is there a threat to the safety of the survivor / complainant right now? ☐ yes ☐ no ☐ I do not know

If yes — describe: \_\_\_\_\_

## B.9. Signature

Date: " \_\_\_\_ " \_\_\_\_\_ 20\_\_\_\_ . Signature (optional): \_\_\_\_\_

**Your safety is the priority.** The Organization will not subject you to any pressure or retaliation for this report. If the situation requires immediate intervention (threat to life, health) — call 102 (police), 15 47 (hotline for combating domestic violence), 112 (unified emergency service).

## Annex C. Reporting Procedure (Flowchart)

Below is the sequence of actions from the moment of detection of an incident to the closure of the case (step-by-step description of the flowchart).

### Step 1. Detection / receipt of information

- a person witnessed, received a report or has a reasonable suspicion;
- first of all — ensure the safety of the survivor (in the event of risk — 102, ambulance 103, fire service 101);
- record time, place, witnesses — where possible.

### Step 2. Submission of the report (→ 24 hours)

- choose a channel (email, hotline, online form, offline drop-box, in-person meeting);
- may be anonymous or under a pseudonym;
- the Focal Point confirms receipt.

### Step 3. Triage assessment (→ 48 hours)

- the Focal Point, jointly with the Executive Director (or the Chairman of the Management Board — in case of conflict of interest), determines:
- the level of urgency (imminent threat vs. historical case);
- the interim measures required;
- the need for mandatory disclosure to the donor;
- the support needs of the survivor (medical / psychosocial / legal).

### Step 4. Establishment of the PSEAH Committee (→ 5 working days)

- in the standard composition (clause 8.3);
- if necessary — an external expert;
- members sign the NDA and a declaration on the absence of conflict of interest.

### Step 5. Investigation (→ 30 days, may be extended up to 60)

- interviews with the complainant (with consent), witnesses, and the person subject to the complaint;
- collection of documents, correspondence, records;
- assessment of credibility and balance of evidence;
- working sessions of the Committee, minuted discussion.

### Step 6. Decision and sanctions (→ 10 working days)

- decision of the Management Board / order of the Executive Director;
- if justified — transfer of materials to law enforcement authorities;
- communication of the result to the complainant (within the permitted limits).

### Step 7. Support of the survivor and follow-up (not less than 6 months)

- regular contacts, adaptation of working conditions;
- assessment of the effectiveness of the measures taken.

### Step 8. Closure of the case and lessons-learned analysis

- the case is closed by a formal entry in the Register;
- an analysis is conducted — what systemic changes are needed (training, procedures);
- an aggregated record is included in the annual report.

## Annex D. Support Contacts

Updated by the PSEAH Focal Point every 6 months, or more frequently upon change of contact data.

### D.1. Internal RUKH Contacts

| Role                                 | Contact                                                                                          | When to contact                                                  |
|--------------------------------------|--------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| PSEAH Focal Point                    | safeguarding@rukhh.global / +380 XX XXX XX XX                                                    | any incident, question, consultation                             |
| Deputy Focal Point                   | deputy-safeguarding@rukhh.global                                                                 | in the absence of, or conflict of interest with, the Focal Point |
| Executive Director                   | hello@rukhh.global (marked "PSEAH — confidential")                                               | complaints regarding the Focal Point or managers                 |
| Chairman of the Management Board     | board@rukhh.global (marked "PSEAH — confidential")                                               | complaints regarding the Executive Director                      |
| External ombudsman (where available) | published separately at <a href="http://rukhh.global/safeguarding">rukhh.global/safeguarding</a> | when internal channels raise doubts                              |

### D.2. National Services of Ukraine

| Service                                                                                            | Number / contact            | Services                                                              |
|----------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------------------------|
| National Police                                                                                    | 102                         | immediate assistance, receipt of crime reports                        |
| Emergency Medical Service                                                                          | 103                         | urgent medical assistance                                             |
| Unified Emergency Service                                                                          | 112                         | coordination of emergency services                                    |
| Hotline for Combating Domestic Violence                                                            | 15 47 (free, 24/7)          | psychological and legal consultation                                  |
| "La Strada-Ukraine"                                                                                | 0 800 500 335 / 116 123     | combating human trafficking, domestic violence, gender discrimination |
| NGO "Poruch"                                                                                       | poruch.ua / t.me/poruch_app | free online psychotherapy                                             |
| National Hotline for Children and Youth                                                            | 0 800 500 225 / 116 111     | consultations for children and youth                                  |
| Free Legal Aid                                                                                     | 0 800 213 103               | legal consultations                                                   |
| Centre for Medical and Social Rehabilitation of Victims of Conflict-Related Sexual Violence (CRSV) | upon regional request       | sexual violence related to conflict                                   |

### D.3. Contacts in Poland

| Service                                 | Number / contact | Services                                     |
|-----------------------------------------|------------------|----------------------------------------------|
| Policja / Ratunek                       | 112 / 997        | police / emergency line                      |
| Feminoteka                              | 888 883 388      | support for Ukrainian women in Poland        |
| Niebieska Linia                         | 800 120 002      | domestic violence                            |
| Centrum Praw Kobiet                     | 600 070 717      | legal and psychological assistance for women |
| La Strada Polska                        | 22 628 99 99     | combating human trafficking                  |
| Telefon Zaufania dla Dzieci i Młodzieży | 116 111          | children and youth                           |

### D.4. International Resources

| Resource                                             | Contact / URL                                                                                                                                                            |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| UN Office of Victims' Rights Advocate                | <a href="http://victimsrightsadvocate.un.org">victimsrightsadvocate.un.org</a>                                                                                           |
| IASC — Protection from Sexual Exploitation and Abuse | <a href="http://interagencystandingcommittee.org/protection-sexual-exploitation-and-abuse">interagencystandingcommittee.org/protection-sexual-exploitation-and-abuse</a> |
| CHS Alliance — PSEAH resources                       | <a href="http://chsalliance.org/psea">chsalliance.org/psea</a>                                                                                                           |
| Report Misconduct to UN                              | <a href="http://integrityhotline.unicef.org">integrityhotline.unicef.org</a> or the specific agency — UNHCR, UNICEF, WFP Inspector General                               |

## Annex E. Training Curriculum Outline

Below is the structure of mandatory and specialized PSEAH trainings of RUKH Global.

### E.1. Basic Induction Training (2 hours, mandatory for all)

| No. | Module                                       | Content                                                                                                        |
|-----|----------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| 1   | Introduction and context                     | Why PSEAH is not bureaucracy but culture; statistics and impact on communities; context of war, IDPs, diaspora |
| 2   | Definitions and terms                        | Sexual exploitation, abuse, harassment; maltreatment; survivor; vulnerable group                               |
| 3   | IASC Six Core Principles                     | the six principles with examples from real life                                                                |
| 4   | Prohibited conduct                           | specific examples (Section 4 of the Policy), including online manifestations                                   |
| 5   | Victim-centered approach and do no harm      | principles, examples of mistaken bystander actions that re-traumatize                                          |
| 6   | Duty to report + bystander intervention (5D) | how to act in various situations, role-plays                                                                   |
| 7   | Reporting channels (RUKH CBCM)               | practical walk-through of email, online form, hotline; non-retaliation principle                               |
| 8   | Sanctions and responsibility                 | what awaits the perpetrator; the complaint cycle                                                               |
| 9   | Final test (10 questions, passing score 80%) | retake — in 1 week in case of failure                                                                          |

### E.2. Annual Refresher (1 hour)

- updates to the Policy and new norms;
- analysis of anonymized cases of the year;
- updates to channels and contacts;
- short assessment of knowledge (5 questions).

### E.3. Specialized Training for Managers (4 hours)

- recognizing signals within the team;
- working with reasonable suspicion;
- conducting difficult conversations;
- managing the culture of psychological safety;
- manager's own accountability.

### E.4. Training for the Focal Point and PSEAH Committee (8 hours, + simulation)

- trauma-informed interviewing;
- documentation, preservation of evidence, GDPR;
- work with law enforcement;
- working with donor requirements (EU / UN / Sida / GIZ);
- case management and follow-up;
- self-care (vicarious trauma, self-care).

### E.5. Child Safeguarding (4 hours, for persons working with children)

- rights of the child, UN CRC;
- developmental stages, recognition of signs of abuse;
- grooming and online safety;
- two-adult rule, open door rule;
- interaction with parents and the Service for Children's Affairs.

### E.6. Training for Event Volunteers (30 min briefing)

- fundamentals of the Policy;
- rules of conduct at the event;
- how to recognize and where to refer;
- contacts of the event Focal Point.

### E.7. Verification of Training Providers

- priority — Ukrainian and international providers with certified experts (CHS Alliance, Keeping Children Safe, UN Women, "La Strada-Ukraine", UCBI);
- possible use of online courses: Agora / UNICEF PSEA, Kaya Connect (Humanitarian Leadership Academy), DisasterReady;
- delivery of internal training by the Focal Point is permitted if the Focal Point holds a ToT (train-the-trainer) certification.