

**Order  
on the approval of the  
«PROCEDURE  
OF RECEIVING AND HANDLING OF COMPLAINTS AND FEEDBACK»  
of the RELIGIOUS MISSION «CARITAS-SPES» /CARITAS-SPES/  
of the ROMAN CATHOLIC CHURCH IN UKRAINE**

27. March .2026, Kyiv  
№32/26

For the purpose of the effective implementation of the PROCEDURE OF RECEIVING AND HANDLING OF COMPLAINTS AND FEEDBACK of the RELIGIOUS MISSION «CARITAS-SPES» /CARITAS-SPES/ OF THE ROMAN CATHOLIC CHURCH IN UKRAINE (hereinafter – the “Mission”),

**I hereby order:**


1. To approve, on 27.03.2026, the « PROCEDURE OF RECEIVING AND HANDLING OF COMPLAINTS AND FEEDBACK of the RELIGIOUS MISSION «CARITAS-SPES» (hereinafter – the «Procedure»).
2. The Safeguarding Manager shall ensure that the employees of the Mission are familiarized with the content of the Procedure.
3. I retain control over the implementation of this Order.
4. This Order shall enter into force on 27.03.2026.

**Executive Director  
of the Religious Mission «CARITAS-SPES»/  
CARITAS-SPES/  
of the Roman Catholic Church in Ukraine**



**V. Grynevych**

**APPROVED:**  
**Executive Director** /Vyacheslav  
**GRYNEVYCH**  
"24" March 2026



**PROCEDURE  
OF RECEIVING AND HANDLING OF COMPLAINTS  
AND FEEDBACK of the Religious Mission «Caritas-Spes» /CARITAS-SPES/  
of the Roman Catholic Church in Ukraine  
(hereinafter referred to as «Caritas-Spes Ukraine»)**

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## INTRODUCTION

The Religious Mission “CARITAS-SPES” of the Roman Catholic Church in Ukraine (hereinafter – RM “CARITAS-SPES” or the Mission) is a charitable structure of the Catholic Church of the Latin Rite in Ukraine, a full member of the confederations of Caritas Internationalis and Caritas Europa.

When identifying such a phenomenon as “Caritas”, in particular RM “CARITAS-SPES”, it should be taken into account that the word “structure” is used here somewhat conditionally, for the purpose of adapting the phenomenon

“Caritas”, as an organizational unit, to concepts commonly used in modern society. Instead, in the ecclesiological (church) sense, “Caritas” is rather a form of the Church’s service to those most in need, the face of the mystical Body of Christ turned toward the needy, the abandoned, the suffering.

At the center of the service of RM “CARITAS-SPES” is the human person: his or her problems, needs, hopes, and demands. Therefore, it is extremely important for us to know the assessment of all those who encounter the activities of the Mission in their lives regarding the quality, effectiveness, and safety of our work. The concept of “all” here includes: beneficiaries, staff and non-staff employees, volunteers, engaged specialists, etc. of all levels, management, the Church, state authorities, partners, the media, Ukrainian society, and the international community in general.

One of the elements that should, first and foremost, point out the shortcomings of our work and ways to improve it is the Feedback System, the operating algorithm of which is defined by this Procedure.

The life of every person is sacred from conception to natural death. Created in the image and likeness of God, all women and men are endowed with unique and unrepeatable dignity, since they "surpass all other things, and their rights and duties are universal and inviolable"<sup>1</sup>. "For from the deepest depths of his nature, the human person is a social being, and without relations with others can neither live nor develop his abilities"<sup>2</sup>. "All social life is a manifestation of its unquestionable protagonist – the human person"<sup>3</sup>, who is not an object or passive element of social life, but must remain its subject, foundation, and goal"<sup>4</sup>. "This social order requires constant improvement. Its basis must be truth, and its foundation – justice and living love; in freedom this order must grow day by day, coming ever closer to a humane balance"<sup>5</sup>. Human dignity and its social nature are the basis and inspiration for the formation of a moral society.

Cases of accusations of sexual abuse in many countries of the world, especially in the development sector (both of society as a whole and of each human person in particular) and the humanitarian sphere, have cast a shadow over the extremely important work of providing assistance to vulnerable populations, which is carried out by many international and local civil society organizations, including organizations founded on the principles of faith and Christian treatment of every human being in the light of Christian teaching and morality, such as the “Caritas” family.

These egregious cases prompted the Caritas Internationalis Confederation to undertake deep analysis and progress in combating and preventing any forms of violence both within its own activities (first of all – in relation to Caritas beneficiaries, but also in relation to employees with different levels of involvement in “Caritas” service), and in the modern world in general. The relevant decisions were also adapted by regional Caritas federations and national structures in various regions and countries.

For RM “CARITAS-SPES”, the highest priority is to make sure that the Mission is a safe environment for everyone. The leadership, management, staff, and volunteers of “CARITAS-SPES” must jointly and collectively contribute to this common commitment.

The RM “CARITAS-SPES” network (National Office, diocesan centers, and local organizations) made a joint decision to make every possible effort to develop and root the Safeguarding system at both the national and local (diocesan and parish) levels, in the work of all local offices and centers, and in general at all levels and in all areas of the network’s activities.

For successful implementation, a decision was also made to strengthen the capacity and skills of nationwide and local organizations (that is, once again, the entire network) through training of an appropriate specialist involved in the activities of the National Office and a local employee who in the future will be a resource of information, knowledge, and best practices for the local office, and will also guarantee compliance with policies and procedures on the ground.

This Procedure is intended to unify, both at the national level and at all levels of the RM “CARITAS-SPES” network, the process of submitting, classifying, registering, and reviewing complaints, issuing decisions on complaints and implementing them, ensuring confidentiality and the safety of participants in complaint-related processes, the mechanism for appealing decisions, etc.

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<sup>1</sup> Second Vatican Council, Pastoral Constitution on the Church in the Modern World: *Gaudium et Spes*, No. 26.

<sup>2</sup> *Ibid.*, No. 12

<sup>3</sup> Compendium of the Social Doctrine of the Church, No. 106.

<sup>4</sup> From the radio message of Pope Pius XII of 24 December 1944, 5: AAS 37 (1945), 12.

<sup>5</sup> Second Vatican Council, Pastoral Constitution on the Church in the Modern World: *Gaudium et Spes*, No. 26.

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The purposes of implementing and complying with this Procedure are:

- to ensure a clear procedure for the submission, registration, classification, and handling of complaints;
- to ensure a clear procedure for reporting on the handling of complaints, the adoption of decisions, and their implementation;
- to ensure confidentiality and the safety of participants in complaint-related processes.

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<sup>6</sup> For the purposes of this Procedure, "staff" means all board members, managers at all levels, employees, volunteers, and consultants, as well as suppliers, contractors, and other associated persons who provide any services to RM "CARITAS-SPES" RCC in Ukraine or to the Mission's beneficiaries

## **1. DEFINITION OF TERMS AND KEY PERSONS**

This Procedure uses the following terms and definitions:

### **1.1. Complaint**

According to this Procedure, a complaint is a report (in written or oral form) of actions or omissions by employees, volunteers, or partners of the Mission, service providers, or suppliers of goods that directly or indirectly caused harm to any vulnerable person; a report of violations of the Code of Ethics, Codes of Conduct, and Policies of the Mission in the area of safeguarding, as well as reports regarding financial violations, unlawful actions (omissions), corruption, fraud, sexual exploitation and abuse, and failure to ensure child protection.

### **1.2. Anonymous complaint**

In the process of working with any complaints, the Mission offers all complainants the opportunity to identify themselves voluntarily.

At the same time, the Mission recognizes and respectfully treats the personal reservations and concerns of the complainant that, under certain circumstances, openness (self-identification) may cause complications, and therefore anonymous reports are also allowed. However, in this case the complainant is informed that the anonymity of the report (complaint) may complicate or make impossible both the subsequent actions regarding its review and the informing of the involved parties (including the complainant himself/herself) about the results of the handling; instead, it is emphasized that the Mission ensures confidentiality (see clause 1.3 of this Procedure) and protection of the complainant's personal data.

### **1.3. Confidentiality**

All complaints (sensitive or project-related) are reviewed in compliance with the principle of confidentiality. In some cases, disclosure of information to third parties may be necessary. The leadership of the National Office decides on disclosure of information to third parties, based on the requirements of Ukrainian legislation and with the aim of protecting affected persons.

Exceptions are cases where the suspicion of a violation of safeguarding norms concerns a person in the clerical state (priest, monk/nun, seminarian). In such a case, the third party that must be informed of the report (complaint) is the bishop of the local Church (diocese) in whose territory the alleged incident occurred – in the case of suspicion concerning a priest or seminarian of the diocesan seminary, or the higher leadership of the institution of Consecrated Life – in the case of suspicion concerning a consecrated person (monk/nun).

Confidentiality is of paramount importance in order to guarantee safety to complainants, whistleblowers, witnesses, and subjects of complaint review. Information concerning complaints and related investigations must be shared only on a need-to-know basis clearly defined for each case.

In the event of a breach of confidentiality, the higher leadership of the Mission may take disciplinary measures, except in the following cases:

- disclosure of information is provided for by current legislation;
- disclosure of information is required by management in the interests of all involved parties;
- disclosure of information is required by the donor of the project in which the incident occurred;
- disclosure of information is necessary for a special examination (medical, legal, etc.).

Complaints indicating a possible criminal offense must be referred by RM “Caritas-Spes” RCC in Ukraine for consideration by the competent state authorities responsible for investigating such matters. This action, in the event of an appeal to the competent authorities by RM “CARITAS-SPES” RCC in Ukraine as an organization (legal entity), is carried out by the manager of the relevant level who has signing authority in the respective center (office, institution, facility, etc.) of the Mission.

#### **1.4. Malicious complaint or defamation**

If clarification of the circumstances reveals that the accusation is intentionally false and made with the aim of causing harm, and if the complainant is an employee of the RM “CARITAS-SPES” network, then appropriate disciplinary measures will be taken against such employee, including possible dismissal. Reports that prove to be malicious will be considered a serious disciplinary offense.

If the identity of the person against whom a malicious accusation or defamation was made has been disclosed, the higher leadership of the Mission, together with the direct management of the said person, will take appropriate measures to restore his or her reputation.

#### **1.5. Presumption of innocence**

A fundamental legal principle for the treatment of persons against whom accusations have been made (a complaint has been filed). According to this principle, a person suspected of committing an offense is considered innocent until his or her guilt has been proven in the manner provided for by this Procedure.

The presumption of innocence does not prevent RM “CARITAS-SPES” from taking appropriate measures with regard to an employee for the period of clarification of the circumstances.

#### **1.6. Head of the Project Management Department (HPMD)**

The Head of the Project Management Department is an official within the National Office of the Mission whose powers include, among other things, the review, assessment, and taking of further action in the event of receipt of complaints of a project-related nature (that is, complaints related, first of all, to the project activities of RM “CARITAS-SPES” at different levels of the organization’s network).

#### **1.7. Person Responsible for the Implementation of the Safeguarding System (PRISS)**

The Person Responsible for the Implementation of the Safeguarding System of the RM “CARITAS-SPES” network is a specialist of the Mission’s National Office whose tasks include registration of sensitive complaints in the Complaints Register, collection of information on received sensitive complaints, initiation of meetings of the CRSC (Commission for the Review of Sensitive Complaints), participation in the work of the CRSC (in the absence of a conflict of interest), and communication of the CRSC’s conclusions to interested parties<sup>7</sup>.

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## **1.8. Commission for the Review of Sensitive Complaints (CRSC)**

The Commission for the Review of Sensitive Complaints is a temporary collegial body that reviews each specific complaint, appoints additional inquiry, determines a specific Specialist in Information Analysis and Investigation Procedure (SIAIP), assesses the inquiry materials, and issues a decision on each specific sensitive complaint.

The formation and operating algorithm of the CRSC are determined by this Procedure.

## **1.9. Specialist in Information Analysis and Investigation Procedure (SIAIP)**

The Specialist in Information Analysis and Investigation Procedure is a person authorized to conduct an inquiry into a sensitive complaint, collect necessary (including additional) information, and provide the results of his or her own inquiry (without expressing evaluative judgments) for consideration by the members of the CRSC.

## **1.10. Whistleblower**

**A whistleblower is an employee, volunteer, or affiliated person who, having reason to believe that the information is reliable, has approached or intends to approach the Mission with a report concerning violations of policies in the area of safeguarding (reports concerning any forms of abuse, any forms of exploitation, any forms of harassment, financial violations, unlawful actions (omissions), corruption, fraud, and failure to ensure child protection).**

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<sup>7</sup> If it is impossible to involve the National PRISS at the time a sensitive complaint is received (vacation, business trip, illness, temporary vacancy of the position, etc.), the President of the Mission by his/her decision appoints an Acting National PRISS from among the regular employees of the National Office of RM "CARITAS-SPES" in Kyiv. The candidacy of the Acting National PRISS must be coordinated with the Executive Director of the Mission. Heads of the project and finance departments of the Mission may not be involved in performing the duties of the Acting National PRISS due to the potential risk of a conflict of interest.

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## **2. WHO MAY FILE A COMPLAINT**

Any person who has become aware of cases of abuse, exploitation, harassment, or unprofessional behavior by employees of the Mission with any degree of involvement in activities (staff, non-staff, temporarily engaged, volunteer, consultant, intern), or who has suspicions regarding the commission of such actions, may file a complaint through one of the channels set out in the following clause, or personally to any employee of the Mission.

Any employee of RM “CARITAS-SPES” RCC in Ukraine, with any degree of involvement in activities (staff, non-staff, temporarily engaged, volunteer, consultant, intern), who becomes aware of a case of violation of the Code of Ethics, the Code of Conduct, policies, and norms on safeguarding of the Mission, has the duty (is obliged) to report this in the manner set out below. Failure to fulfill this obligation is grounds for the application of disciplinary measures to such employee.

If such a complaint is received personally from a person, the Mission employee is obliged to transfer the received information (complaint) for further handle through one of the channels set out in clause 5 of this Procedure. Failure to fulfill this obligation is grounds for the application of disciplinary measures to such employee.

### **3. PROVISIONS REGARDING WHISTLEBLOWERS**

#### **3.1. General provisions.**

**RM "CARITAS-SPES" undertakes to ensure the protection of whistleblowers (employees, volunteers, or affiliated persons who, having reason to believe that the information is reliable, have approached or are going to approach the Mission with a report regarding violations of policies in the area of safeguarding (reports concerning any forms of abuse, any forms of exploitation, any forms of harassment, financial violations, unlawful actions (omissions), corruption, fraud, and failure to ensure child protection)).**

RM "CARITAS-SPES" ensures the protection of whistleblowers in two important areas: confidentiality and protection from retaliation. To the extent possible, the confidentiality of the whistleblower will be preserved. However, it may become necessary to disclose the person's identity in order to conduct a thorough investigation, comply with the law, and ensure the accused persons' lawful rights to defense.

Protection includes, but is not limited to, protection from retaliation in the form of adverse employment actions such as dismissal, reduction of salary, poor work assignments, and threats of physical harm. Any whistleblower who believes that he/she is experiencing retaliation must immediately contact the PRISS. The whistleblower's right to protection from retaliation does not include immunity from any personal misconduct that is alleged and investigated.

A person has the right to the protection provided for by this policy if he or she reasonably believes that the information being reported is or may become a matter of concern for RM "CARITAS-SPES"; and reports the information in good faith.

#### **3.2. Reporting retaliation.**

Whistleblowers who believe that they are experiencing retaliation must contact RM "CARITAS-SPES" RCC in Ukraine directly.

Cases of retaliation may be reported directly to the Executive Director of the Mission "Caritas-Spes" and to the PRISS by the following means:

(i) the confidential email address of RM "CARITAS-SPES": [safeguarding@caritas-spes.org](mailto:safeguarding@caritas-spes.org) (ii) in person to the Executive Director of the Mission and the PRISS [safeguarding@caritas-spes.org](mailto:safeguarding@caritas-spes.org)

In cases where a whistleblower believes that he or she has suffered retaliation, he or she must report the suspected retaliation as soon as possible. The report must be based on facts and contain as much specific verifiable information as possible to ensure an appropriate assessment of the nature, scope, and urgency of the preliminary review.

To help employees who are unsure whether certain facts should be reported, RM "CARITAS-SPES" offers confidential and impartial advice and support to (potential) whistleblowers. RM "CARITAS-SPES" may recommend to the Executive Director/diocesan directors appropriate measures to protect the interests of and safeguard the whistleblower from retaliation at any time from the moment the whistleblower disclosed the information. Protective measures are recommended with the whistleblower's consent and may include, but are not limited to:

- transfer to another position or function for which the whistleblower has the appropriate qualifications
- any other appropriate measures in each specific case, including security measures.

Protective measures may also include temporary reassignment, transfer, granting of special leave, or any other appropriate action in each specific case regarding the suspected retaliator.

### **3.3. Disciplinary measures**

In the event of possible misconduct by an employee, if it is considered that the continuation of his or her functions may harm the interests of RM "CARITAS-SPES", the employee may be placed on administrative leave until a conclusion is received regarding the misconduct. Such administrative leave may be paid or, in exceptional cases, unpaid.

Based on the results of the investigation, the Executive Director/diocesan directors may initiate disciplinary measures.

Disciplinary measures may take the form of any of the following measures or a combination thereof:

- oral reprimand;
- written reprimand, which is kept in the employee's personal file for five years, after which it is removed;
- dismissal;

Disciplinary measures may also be taken in the event of a malicious report of wrongdoing.

## 4. GENERAL CLASSIFICATION OF COMPLAINTS

All complaints, the definition of which is contained in clause 1.1 of this Procedure, regardless of their source, are divided into two categories: project complaints and sensitive complaints.

### 4.1. Project complaints

Complaints in this category may concern various aspects of the Mission’s current and project activities, but are not related to violations of ethical norms and various kinds of abuse, harassment, exploitation, violence, etc., nor to abuse in the financial and economic sphere.

No.	Types of project complaints	Description
1	Obtaining information	Questions regarding ongoing projects, types of assistance, or the Mission’s activities in general.
2	Request for assistance	Request of an individual regarding receipt of social services that were not provided due to a possible error in the assessment of needs and/or an access problem (ability to reach the beneficiary).
3	General remarks and suggestions	Wishes (advice, recommendations) regarding improving assistance to those in need in the future.
4	Assessment of services	Gratitude for services provided
5	Other	A request for assistance not provided for by the Mission’s projects, or project feedback concerning support provided by another provider organization. No ethics violations, abuse, or fraud fall within this category.

### 4.2. Sensitive complaints

With regard to this category, complaints may concern the following aspects:

- i. behavior of Mission staff (employees, interns, volunteers, consultants), suppliers, and partners of the RM “CARITAS-SPES” RCC in Ukraine network;
- ii. financial issues such as misappropriation of funds, fraud, corruption, or conflict of interest;
- iii. harassment, including sexual exploitation and abuse;
- iv. any types of physical or psychological violence.

<b>No.</b>	<b>Types of sensitive complaints</b>	<b>Description</b>
1	Violations of ethical norms, codes of conduct, safeguarding policies and procedures	<p>Reports of actions by persons that contradict the ethical norms, codes of conduct, policies, and procedures of the Safeguarding system of the RM “Caritas-Spes” network and are committed by employees (staff and/or non-staff), interns, volunteers, consultants, partners, and suppliers, including the following aspects:</p> <ul style="list-style-type: none"> <li>harassment</li> <li>abuse or exploitation</li> <li>fraud or misuse of project resources</li> <li>unprofessional behavior</li> </ul> <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>
2	Sensitive – other aspects	Any reports regarding cases (suspicions, assumptions) of exploitation or abuse that do not concern the staff of the RM “CARITAS-SPES” network, Mission partners, employees of other partner organizations, communities or local (including religious) communities with which the Mission cooperates.
3	Security	Information related to the security of offices, centers, and facilities of the RM “CARITAS-SPES” network, their staff and/or material resources, and/or the safety of services provided by contractors (or any other organization), or the safety of communities (including religious ones) with which the Mission cooperates.

## 5. CHANNELS FOR SUBMITTING COMPLAINTS

<b>FACE-TO-FACE (PRIMARY CHANNEL)</b>	<p>Any employee (including a volunteer) of RM “CARITAS-SPES” and its humanitarian support centers may receive feedback in person while carrying out project-related activities and interacting with beneficiaries. After that, the employee is obliged to assess which category the feedback received belongs to under clause 4 and take measures for its documentation (description) and registration in accordance with the procedures described in clause 6 below.</p>
<b>SAFEGUARDING EMAILBOX (PRIMARY CHANNEL)</b>	<p>The safeguarding email inbox (<a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a>) is a confidential email address (different from the general inquiry email address) created for the purpose of receiving written feedback from beneficiaries, staff, and community members. Social workers in the centers must be instructed that all interested parties must submit their reports in writing through this channel. The National PRISS is the only person who has access to the email inbox and is responsible for checking it daily. Any feedback received is classified in accordance with clause 4; project feedback is registered in the Feedback Log, and sensitive feedback in the Sensitive Complaints Register. The National PRISS takes measures to respond to emails in accordance with the procedures described in clause 6 below. In order to provide an effective response, the National PRISS may additionally contact the sender of the message and/or staff on the ground to clarify and describe details (if necessary) or request contact information if the feedback is anonymous.</p>
<b>WEBSITE FORM</b>	<p>Submissions, including anonymous ones, may be received through the “Sensitive Complaint” form on the website <a href="http://caritas-spes.org">caritas-spes.org</a>. These submissions are automatically forwarded to the safeguarding email inbox (<a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a>) and are reviewed in accordance with the instructions for this channel and the procedures described in clause 6 below.</p> <p><a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a></p>
<b>LETTERS RECEIVED BY MAIL (ADDITIONAL CHANNEL)</b>	<p>Sometimes RM “CARITAS-SPES” or diocesan organizations may receive letters from beneficiaries with feedback on the services provided by RM “CARITAS-SPES”. These letters are received by the secretary of the National Office or diocesan organizations. If such letters are received, they must be transferred/sent to the National PRISS, who is responsible for opening and documenting the received feedback in accordance with the procedure set out in clause 6 below.</p>
<b>SOCIAL NETWORKS</b>	<p>If feedback is received through social networks, the employee who has access to social networks must classify the submission. If it is a project-related submission, forward it to <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>; if a sensitive submission is received, forward it to <a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a>. After forwarding, the feedback must be immediately deleted from social networks, and the complainant informed that the message is being reviewed and was deleted in order to preserve confidentiality. <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>, <a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a>.</p>

<b>NATIONAL TELEPHONE HOTLINE</b>	Feedback from beneficiaries, including requests and questions, may be received through the National telephone hotline number 0800 300 344. Such calls are received by the hotline operator. The operator records the call,
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<b>(subject to available funding)</b>	classifies the submission and documents it. If it is a project-related submission, the operator provides information (where possible) or forwards it to <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a> ; if a sensitive submission is received, it is forwarded to <a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a> . <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a> ,
<b>Telephone number in the diocese or center</b>	Similarly to the above, feedback from beneficiaries may be received through the telephone number of the center. Such calls are usually received by any social worker of the center. If these are project-related questions or general information about the activities of the center, the social worker must provide appropriate assistance. If the caller has a complaint, he/she must be redirected to the telephone number of the National hotline, which will process the submission in accordance with the procedure set out in clause 6 below.
<b>PDM online survey and/or paper form</b>	During Post-Distribution Monitoring (PDM), sensitive and project-related submissions may be received. Survey results are processed in the National Office and, if necessary, forwarded to coordinators in the dioceses.
<b>Safeguarding survey</b>	Interviews/surveys of beneficiaries regarding safeguarding are regularly conducted by phone by the National PRISS. Any sensitive and project-related feedback received during these interviews will be processed in accordance with the procedure described in clause 6 below.

All employees and volunteers are required to undergo training on the Procedure of Receiving and Handling Complaints and Feedback in order to be able to identify sensitive and project-related submissions and ensure their confidentiality. RM "CARITAS-SPES" RCC in Ukraine provides such training once a year, as well as additional training at the start of new projects.

## 6. PROCEDURE FOR RECEIVING AND PROCESSING FEEDBACK AND COMPLAINTS

### FACE-TO-FACE

<p><b>Receipt of feedback</b></p>	<p>- During meetings with beneficiaries or during visits by beneficiaries to centers, in the course of daily project activities or incidental visits to RM “CARITAS-SPES” centers/offices.</p> <p>Anyone who decides to provide feedback in person to an employee or volunteer of RM “CARITAS-SPES” will be listened to and politely assured that the feedback will be documented and passed to the relevant employee for further confidential action, if the situation requires it.</p> <p>-</p>
<p><b>Collection/receipt of information</b></p>	<p><b>Project feedback</b></p> <p><b>Staff/social workers must ensure that they understand the feedback by asking questions to clarify key points.</b></p> <p><b>If a person starts speaking in the presence of other people whose presence may prevent him/her from speaking freely, staff try to resolve the situation by asking the person to step aside (where appropriate) or by asking another colleague for assistance who will take control of the situation.</b></p> <p><b>If necessary and at the discretion of staff, all the most important details of the feedback are documented in free form during or immediately after the interview conducted by the staff member on site, and the applicant is informed about this and asked to give verbal consent to document his/her name, contact information, and the circumstances being reported, if the situation requires it (for example, the person insists on receiving an official response to his/her request, etc.). This feedback is sent by staff immediately after documentation to <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</b></p> <p><b>Sensitive feedback</b></p> <p><b>The case/report is carefully documented by the employee who received the feedback, and if the person wishes to receive an official response/case follow-up from RM “CARITAS-SPES”, beneficiaries are specifically asked to give verbal consent to document their name, contact information, and the circumstances they report.</b></p> <p><b>The applicant has the right to report a complaint anonymously; in such a case the employee documents the complaint without indicating the applicant’s name; the employee of RM “CARITAS-SPES” is obliged to inform the applicant that in some cases the organization is not able to fully investigate an anonymous sensitive complaint.</b></p> <p><b>Staff on the ground do not investigate the case, but only register it and forward it in full (no later than within 24 hours after receiving the feedback) to the organization’s special confidential email address <a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a>, which is received by the National PRISS, and then delete the documentation related to it describing the case, without sharing or commenting on any details or circumstances related to this case with other colleagues!</b></p> <p>-</p> <p>-</p>

- [feedback@caritas-spes.org](mailto:feedback@caritas-spes.org)

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- [safeguarding@caritas-spes.org](mailto:safeguarding@caritas-spes.org),

<p><b>Response to feedback received face-to-face</b></p>	<p>Project feedback</p> <p>If there is a quick/direct response to a request/feedback, staff on the ground provide it and close the case.</p> <p>If further follow-up is needed or the case requires more careful reconsideration of the project component/type of support, etc., the person is informed that his/her feedback will be documented and forwarded to the relevant employee for further follow-up of his/her case, who (if the situation requires it) will contact him/her within two weeks (14 days).</p> <p>Staff on the ground record or keep track of all main or aggregate requests, complaints, and comments of a project-related nature and periodically pass them on to the Head of the Project Management Department.</p> <p>Sensitive feedback</p> <p>Beneficiaries are informed by the National PRISS that their complaint/report has been received and will be thoroughly and confidentially investigated. The sender is informed that a representative of RM "CARITAS-SPES" will contact him/her to provide an official response or clarify additional details within 72 hours (3 working days). The National PRISS does not independently investigate received sensitive feedback, but only registers it in the Sensitive Complaints Register, forwards it in full (no later than within 24 hours after receipt of the feedback) to the relevant Commission for the Review of Sensitive Complaints, and then deletes the documentation related to it describing the case, without sharing or commenting on any details or circumstances with other colleagues!</p> <p>-</p> <p>-</p> <p>-</p>
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**SAFEGUARDING EMAILBOX**

<p><b>Receipt of feedback</b></p>	<p>- Directly by beneficiaries or community members</p> <p>Indirectly – employees who forward received feedback for further response</p> <p>-</p>
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<b>Collection/receipt of information</b>	<p><b>Project feedback</b></p> <p>All received messages are carefully reviewed daily.</p> <p>If project feedback is received, the National PRISS forwards it to the Head of the Project Department at <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</p> <p>If it is necessary to ask additional questions or clarification is required, the Head of the Project Department (or a person designated by him/her) or the project manager contacts the sender of the feedback to clarify the situation.</p> <p>If the message/feedback is anonymous and/or does not contain contact information of the person who sent it, the Head of the Project Department takes no further action.</p> <p><b>Sensitive feedback</b></p> <ul style="list-style-type: none"><li>-</li><li>- <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</li><li>-</li><li>-</li></ul>
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	<p>- <b>The National PRISS does not conduct an independent investigation of the received sensitive information, but only registers it in the Sensitive Complaints Register, sends it in full (no later than within 24 hours after receipt of the feedback) to the CRSC, and then deletes the documentation related to it describing the case, without sharing or commenting on any details or circumstances with other colleagues!</b></p>
<p><b>Response to feedback received through the safeguarding email inbox</b></p>	<p><b>Project feedback</b></p> <p>- Project feedback received through <a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a> is forwarded by the National PRISS to <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</p> <p>- If further action is required or the case requires more thorough reconsideration of the project component/type of support, etc., the Head of the Project Department or a person designated by him/her informs the person that the feedback will be <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a></p> <p>documented and forwarded to the relevant employee for further follow-up of his/her case, who (if the situation requires it) will contact him/her within two weeks (14 days).</p> <p><b>Sensitive feedback</b></p> <p>- Beneficiaries are informed by the National PRISS that their complaint/report has been received and will be thoroughly and confidentially investigated. The sender is informed that a representative of RM “CARITAS-SPES” will contact him/her to provide an official response or clarify additional details within 72 hours (3 days).</p> <p>- The beneficiary/applicant has the right to report a complaint anonymously; in such case the employee documents the complaint without indicating the applicant’s name; the employee of Caritas-Spes is obliged to inform the applicant that in some cases the organization is not able to fully investigate an anonymous sensitive complaint.</p>

WEBSITE FORM

<p><b>Receipt of feedback</b></p>	<p>Any beneficiary/employee/volunteer/community member may leave feedback in this way.</p>
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<b>Collection/receipt of information</b>	<p><b>Project feedback</b></p> <p>All received messages are carefully reviewed daily. If project feedback is received, the National PRISS forwards it to the Head of the Project Department at <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>. If it is necessary to ask additional questions or clarification is required, the Head of the Project Department (or a person designated by him/her) or the project manager contacts the sender of the feedback to clarify the situation. If the message/feedback is anonymous and/or does not contain contact information of the person who sent it, the Head of the Project Department takes no further action.</p> <p><b>Sensitive feedback</b></p> <p>- The National PRISS does not conduct an independent investigation of the received sensitive information, but only registers it in the Sensitive Complaints Register and sends it</p> <ul style="list-style-type: none"><li>-</li><li>- <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</li><li>-</li><li>-</li></ul>
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	<p>in full (no later than within 24 hours after receipt of the feedback) to the CRSC, and then deletes the documentation related to it describing the case, without sharing or commenting on any details or circumstances with other colleagues!</p>
<p><b>Response to feedback received through the safeguarding email inbox</b></p>	<p><b>Project feedback</b></p> <ul style="list-style-type: none"> <li>- Project feedback received through <a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a> is forwarded by the National PRISS to <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</li> <li>- If further action is required or the case requires more thorough reconsideration of the project component/type of support, etc., the Head of the Project Department or a person designated by him/her informs the person that the feedback will be <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a></li> </ul> <p>documented and forwarded to the relevant employee for further follow-up of his/her case, who (if the situation requires it) will contact him/her within two weeks (14 days).</p> <p><b>Sensitive feedback</b></p> <ul style="list-style-type: none"> <li>- Beneficiaries are informed by the National PRISS that their complaint/report has been received and will be thoroughly and confidentially investigated. The sender is informed that a representative of RM “CARITAS-SPES” will contact him/her to provide an official response or clarify additional details within 72 hours (3 days).</li> </ul>

LETTERS RECEIVED BY MAIL

<p><b>Receipt of feedback</b></p>	<p>Any beneficiary/employee/volunteer/community member may leave feedback in this way.</p>
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<p><b>Collection/receipt of information</b></p>	<p><b>Project feedback</b></p> <p>- All messages received in the Caritas-Spes mailbox are carefully reviewed daily by the National PRISS. If project feedback is received, the National PRISS forwards it to the Head of the Project Department at <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>. If it is necessary to ask additional questions or clarification is required, the Head of the Project Department (or a person designated by him/her) or the project manager contacts the sender of the feedback to clarify the situation. If the message/feedback is anonymous and/or does not contain contact information of the person who sent it, the Head of the Project Department takes no further action.</p> <p><b>Sensitive feedback</b></p> <p>The National PRISS does not conduct an independent investigation of received confidential feedback, but only registers it in the Sensitive Complaints Register, forwards it in full (no later than within 24 hours after receipt of the feedback) to the CRSC, and then deletes the documentation related to it describing the case, without sharing or commenting on any details or circumstances with other colleagues!</p> <p>- <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</p> <p>-</p> <p>-</p> <p>-</p>
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<p><b>Response to feedback received in letters by mail</b></p>	<p><b>Project feedback</b></p> <p>If there is a quick/direct response to a request/feedback, staff on the ground provide it directly by contacting the sender and close the case. If the message/feedback is anonymous and/or does not contain contact information, it is not reviewed and not followed up by the person responsible for correspondence on the ground. If further action is necessary or the case requires more careful reconsideration of the project component/type of support, for example, the social worker informs the person that the feedback will be documented and forwarded to the relevant employee for further follow-up of his/her case, who (if the situation requires it) will contact him/her within two weeks (14 days). Staff on the ground record or keep a log (Feedback Log) of all main or aggregate requests, complaints, and comments, and also periodically pass them on to the project manager.</p> <p><b>Sensitive feedback</b></p> <ul style="list-style-type: none"> <li>- Beneficiaries receive information from the National PRISS that their complaint/report has been received and will be thoroughly and confidentially investigated. The sender is informed that a representative of RM "CARITAS-SPES" will contact him/her to provide an official response or clarify additional details within 72 hours (3 days).</li> <li>- The beneficiary/complainant has the right to report a complaint anonymously; in such a case the employee documents the complaint without indicating the name of the complainant; Caritas places information that in some cases the organization is not able to fully investigate an anonymous confidential complaint.</li> <li>-</li> <li>-</li> <li>-</li> <li>-</li> </ul>
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NATIONAL TELEPHONE HOTLINE (subject to available funding)

<p><b>Receipt of feedback</b></p>	<ul style="list-style-type: none"> <li>- When beneficiaries call the national hotline number 0800 300 344 to ask a question or leave feedback.</li> <li>Anyone who decides to leave feedback by phone is listened to by the hotline operator and politely assured that the feedback will be documented and passed to the relevant employee for further confidential review, if the situation requires it.</li> <li>-</li> </ul>
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<p><b>Collection/receipt of information</b></p>	<p style="text-align: right;"><b>Project feedback</b></p> <p><b>Project feedback received through the national hotline number 0800 300 344 is forwarded for processing/response to the Head of the Project Department at <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</b></p> <p><b>The hotline operator enters data on such a call into the Feedback Log. If it is necessary to ask additional questions or clarification is required, the staff member on the ground contacts the sender of the feedback to clarify the situation. In specific cases requiring further action, and if further action is not yet provided for, the staff member on the ground requests written or verbal confirmation (by email or phone) from the sender regarding the use of personal and contact information, with assurance that this information will be treated as confidential and will be transferred only to the relevant</b></p> <ul style="list-style-type: none"> <li>- <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</li> <li>-</li> <li>-</li> <li>-</li> </ul>
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	<p>employee designated for further action (if this is not the staff member on the ground)</p> <p>Sensitive feedback</p> <p>If the received feedback is of a sensitive nature, the hotline operator does not conduct an independent investigation, but only documents it and then sends it in full (within 24 hours from receipt of the feedback) to the confidential email address for feedback designated by the organization, which is checked by the National PRISS. The designated person then deletes the documentation related to the description of the case, without sharing or commenting on any details with other colleagues! The National PRISS does not conduct an independent investigation of the received confidential feedback, but only registers it in the Sensitive Complaints Register, sends it in full (no later than within 24 hours after receipt of the feedback) to the relevant National Commission for the Review of Sensitive Complaints, and then deletes the documentation related to it describing the case, without sharing or providing comments on any details or circumstances with other colleagues!</p> <p>-</p> <p>-</p>
<p><b>Response to feedback received through the National hotline number</b></p>	<p><b>Project feedback</b></p> <p><b>If there is a quick/direct response to a request/feedback or question, the hotline operator provides it directly to the beneficiary and closes the case. If further study of the case is needed or, for example, the case requires more careful reconsideration of the project component/type of support, the hotline operator informs the person that the feedback will be documented and passed to the relevant employee for further follow-up of the case, who (if the situation requires it) will contact him/her within two weeks (14 days). The hotline operator records project-related requests, complaints, and comments, enters them in the Feedback Log, and sends a message to <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>. The Head of the Project Department or a person designated by him/her periodically reviews the Feedback Log.</b></p> <p><b>Sensitive feedback</b></p> <p><b>The hotline operator informs beneficiaries that their complaint/report has been received and will be thoroughly and confidentially investigated. The sender is informed that a representative of Caritas-Spes will contact him/her to provide an official response or clarify additional details within 72 hours (3 days). The beneficiary/applicant has the right to report a complaint anonymously; in such a case the employee documents the complaint without indicating the applicant's name; the employee of RM "CARITAS-SPES" is obliged to inform the applicant that in some cases the organization is not able to fully investigate an anonymous sensitive complaint.</b></p> <p>-</p> <p>-</p> <p>- <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a></p> <p>-</p>

	<ul style="list-style-type: none"> <li>-</li> <li>-</li> </ul>
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TELEPHONE NUMBERS OF DIOCESES AND CENTERS

<b>Receipt of feedback</b>	- When beneficiaries call the general diocesan number or the telephone number of the center to ask a question or leave feedback.
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	<p>- Anyone who decides to leave feedback by phone to an employee or volunteer of Caritas-Spes is listened to and politely assured that the feedback will be documented and passed to the relevant employee for further confidential handle, if the situation requires it.</p>
<p><b>Collection/receipt of information</b></p>	<p><b>Project feedback</b></p> <p><b>Project feedback received through the general diocesan or center telephone number is documented and forwarded for processing at the national level to <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</b></p> <p><b>If it is necessary to ask additional questions or clarification is required, the staff member on the ground contacts the sender of the feedback to clarify the situation. In specific cases requiring further action, and if further action is not yet provided for, the staff member on the ground requests written or verbal confirmation (by email or phone) from the sender regarding the use of personal and contact information, with assurance that this information will be treated as confidential and transferred only to the relevant employee designated for further action (if this is not the staff member on the ground).</b></p> <p><b>Sensitive feedback</b></p> <p><b>If the received feedback is of a sensitive nature, the employee does not conduct an independent investigation, but only documents it and then sends it in full (within 24 hours from receipt of the feedback) to the confidential email address for feedback designated by the organization, which is checked by the National PRISS. The designated person then deletes the documentation related to the description of the case without transferring or commenting on any details to other colleagues! The National PRISS does not conduct an independent investigation of the received confidential feedback, but only registers it in the Sensitive Complaints Register, sends it in full (no later than within 24 hours after receipt of the feedback) to the relevant National Commission for the Review of Sensitive Complaints, and then deletes the documentation related to it describing the case, without sharing or providing comments regarding any details or circumstances with other colleagues!</b></p> <p>- <a href="mailto:feedback@caritas-spes.org">feedback@caritas-spes.org</a>.</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p>

<p><b>Response to feedback received through diocesan and center telephone numbers</b></p>	<p><b>Project feedback</b></p> <p><b>If there is a quick/direct response to a request/feedback or question, the local social worker/project staff provide it directly to the beneficiary and close the case. If further study of the case is needed or, for example, the case requires more careful reconsideration of the project component/type of support, the social worker informs the person that the feedback will be documented and passed to the relevant employee for further follow-up of the case, who (if the situation requires it) will contact him/her within two weeks (14 days). Staff on the ground record or keep track of all main or aggregate requests, complaints, and comments and periodically pass them on to the project manager.</b></p> <p><b>Sensitive feedback</b></p> <ul style="list-style-type: none"> <li>-</li> <li>-</li> <li>-</li> </ul>
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	<p>- The National PRISS informs beneficiaries that their complaint/report has been received and will be thoroughly and confidentially investigated. The sender is informed that a representative of Caritas-Spes will contact him/her to provide an official response or clarify additional details within 72 hours (3 days). The beneficiary/applicant has the right to report a complaint anonymously; in such a case the employee documents the complaint without indicating the applicant's name; the employee of RM "CARITAS-SPES" is obliged to inform the applicant that in some cases the organization is not able to fully investigate an anonymous sensitive complaint.</p> <p>-</p>
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PDM TELEPHONE, ONLINE SURVEY AND/OR PAPER FORM

<p><b>Receipt of feedback</b></p>	<p>- Feedback from project participants may be received through online or paper PDM (Post-Distribution Monitoring) surveys, as well as during a telephone conversation. Feedback is received and processed at the national level and forwarded to the project manager. If necessary, information obtained during PDM may be provided to local coordinators of the given project.</p> <p>-</p>
<p><b>Collection/receipt of information</b></p>	<p><b>Project feedback</b></p> <p><b>Project feedback received through PDM surveys is summarized and forwarded to the project manager.</b></p> <p><b>Feedback received from PDM is anonymous.</b></p> <p><b>Sensitive feedback</b></p> <p><b>- If the feedback received is of a sensitive nature, the designated contact person does not conduct an independent investigation, but only documents it and then sends it in full (within 24 hours from the moment the receipt of the feedback is established) to the confidential feedback email address designated by the organization <a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a>, which is checked by the National PRISS. The designated person does not share or comment on any details with other colleagues!</b></p> <p><b>- The National PRISS does not conduct an independent investigation of the received confidential feedback, but only registers it in the Sensitive Complaints Log, sends it in full (no later than within 24 hours after receipt of the feedback) to the relevant National Commission, and then deletes the documentation related to it describing the case, without sharing or commenting on any details or circumstances with other colleagues!</b></p> <p>-</p> <p>-</p> <p><a href="mailto:safeguarding@caritas-spes.org">safeguarding@caritas-spes.org</a>,</p>

<p><b>Response to feedback received during PDM surveys</b></p>	<p><b>Project feedback</b></p> <p><b>Feedback on projects received as a result of PDM surveys is regularly discussed at the national level and, if necessary, forwarded to local coordinators of the given project.</b></p> <p><b>Sensitive feedback</b></p> <p><b>If beneficiaries provide contact information, the National PRISS informs them that their complaint/report has been received and will be thoroughly and confidentially investigated. The sender is informed that a representative of RM</b></p> <p>-</p> <p>-</p>
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	<p>"CARITAS-SPES" will contact him/her to provide an official response or clarify additional details within 72 hours (3 days).</p> <p>- The beneficiary/applicant has the right to report a complaint anonymously; in such a case the employee documents the complaint without indicating the applicant's name; the employee of Caritas-Spes is obliged to inform the applicant that in some cases the organization is not able to fully investigate an anonymous sensitive complaint.</p>
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### SAFEGUARDING SURVEY

<p><b>Receipt of feedback</b></p>	<p>- Feedback is received through a telephone survey by the National PRISS. Feedback is received and processed at the national level.</p>
<p><b>Collection/receipt of information</b></p>	<p><b>Project feedback</b></p> <p><b>Project feedback received through the safeguarding survey is documented and forwarded to the Head of the Project Department or a person designated by him/her.</b></p> <p><b>Feedback received during the surveys is anonymous.</b></p> <p><b>Results of safeguarding surveys may be used for discussion at staff meetings for learning and reflection.</b></p> <p><b>Sensitive feedback</b></p> <p><b>If sensitive information is received during safeguarding surveys, the National PRISS does not investigate the matter, but only documents the feedback and then sends it in full (within 24 hours from the moment the receipt of the feedback is established) to the authorized National Commission for the Review of Sensitive Complaints.</b></p> <p><b>The National PRISS does not share or comment on any details with other colleagues!</b></p> <p>-</p> <p>-</p> <p>-</p>

<p><b>Response to feedback received during PDM surveys</b></p>	<p><b>Project feedback</b></p> <p><b>Feedback on projects received through safeguarding surveys is regularly discussed among project staff at the national level. Corrective project actions, if and when necessary, are brought to the attention of the national project manager for further discussion.</b></p> <p><b>Sensitive feedback</b></p> <p><b>The National PRISS informs beneficiaries that their complaint/report has been received and will be thoroughly and confidentially investigated. The sender is informed that a representative of RM “CARITAS-SPES” will contact him/her to provide an official response or clarify additional details within 72 hours (3 days).</b></p> <p><b>The beneficiary/complainant has the right to report a complaint anonymously during a satisfaction survey; in such a case the employee will document the complaint separately and inform the complainant that in some cases the organization cannot fully investigate an anonymous sensitive complaint.</b></p> <p>-</p> <p>-</p>
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## **7. PROCEDURE FOR REVIEWING PROJECT COMPLAINTS**

All reports falling under this category are reviewed personally by the Head of the Project Management Department (hereinafter – HPMD) of the National Office of RM “CARITAS-SPES” or by a person appointed by the HPMD, involving, if necessary, managers of the relevant projects (national level), or project managers or representatives of project teams on the ground (at diocesan, regional, parish levels).

After reviewing the report (complaint), the HPMD independently makes a decision regarding measures to eliminate shortcomings or take other appropriate action. Such a decision may, if necessary, be coordinated with the Executive Director of the Mission. Implementation of decisions is carried out by the HPMD independently or in cooperation with the managers of the relevant projects.

The HPMD informs the complainant (where possible) of the results of the review and implementation of decisions independently or delegates this to the secretary of the Mission’s National Office.

If, during the review of reports, facts are revealed that may indicate the presence in the actions of RM “CARITAS-SPES” staff of signs of abuse, corruption, fraud, etc., the HPMD forwards this report to the PRISS marked “Sensitive Complaint” for further review under one of the algorithms set out in clause 8 of this Procedure.

## **8. PROCEDURE FOR REVIEWING SENSITIVE COMPLAINTS**

### **8.1. Actions of the PRISS regarding the initial processing of sensitive complaints, initiation of meetings of the Commission for the Review of Sensitive Complaints, and actions regarding the "accused" person during the period of clarification of the circumstances.**

After receiving information from the operator about the receipt of a sensitive complaint, the PRISS analyzes data about the person(s) whose action/omission the complaint is directed against, as well as the place (location) of the alleged violation, and on the basis of these data classifies the complaints according to the following criterion:

- the alleged violation occurred in the National Office of RM "CARITAS-SPES";
- the alleged violation occurred in a diocesan center of RM "CARITAS-SPES";
- the alleged violation occurred in a center directly subordinate to the National Office of RM "CARITAS-SPES";
- the accusation of the alleged violation is made against the diocesan director;
- the accusation of the alleged violation is made against the Executive Director of RM "CARITAS-SPES";
- the accusation of the alleged violation is made against the President of RM "CARITAS-SPES";
- the complaint concerns issues of abuse in the financial and economic sphere.

Based on this classification, one of the algorithms set out in clause 8.2 of this Procedure is applied (if the suspicion concerns a clergyman/consecrated person, then the response mechanism applied is the one for an alleged violation of which the diocesan director is accused).

For the period from the receipt of the complaint by the PRISS until the completion of the investigation and the adoption of a decision regarding the person suspected of committing violations of a sensitive nature, the principle of the presumption of innocence applies. At the same time, the direct supervisor of the suspect must take organizational measures that make contacts between the suspect and the complainant or other person(s) against whom the alleged violation may have been committed impossible.

## 8.2. Powers and operating algorithm of the Commission for the Review of Sensitive Complaints

For the implementation of the process of reviewing and processing complaints of a sensitive nature, the National PRISS initiates meetings of the CRSC composed, depending on the qualification of the person(s) and the location of the alleged violation, as follows:

Qualification of the person(s) and location of the alleged violation	Composition of the CRSC
The alleged violation occurred in the National Office	- PRISS; Executive Director of RM “CARITAS-SPES”; President of RM “CARITAS-SPES”; - -
The alleged violation occurred in a center directly subordinate to the National Office	- PRISS; - Executive Director of RM “CARITAS-SPES”; - director of the RM “CARITAS-SPES” center directly subordinate to the National Office;
The alleged violation occurred in a diocesan center	- PRISS; Executive Director of RM “CARITAS-SPES”; diocesan director of RM “CARITAS-SPES” of the relevant diocese; - -
The accusation of the alleged violation is made against the diocesan director	- PRISS; President of RM “CARITAS-SPES”; Person appointed by the diocesan bishop of the given diocese; - -
The accusation of the alleged violation is made against the Executive Director of RM “CARITAS-SPES”.	- PRISS; President of RM “CARITAS-SPES”; person appointed by the Chair of the Conference of Roman Catholic Bishops of Ukraine; - -
The accusation of the alleged violation is made against the President of RM “CARITAS-SPES”.	- PRISS; Executive Director of RM “CARITAS-SPES”; person appointed by the Chair of the Conference of Roman Catholic Bishops of Ukraine. - -

<p>If the complaint concerns issues of abuse in the financial and economic sphere</p>	<ul style="list-style-type: none"> <li>- PRISS;</li> <li>Head of the Finance Department (HFD) of the National Office of RM “CARITAS-SPES” (if the accusation concerns this official, and/or the National Office in general, then instead of the HFD – the President of RM “CARITAS-SPES”);</li> <li>(or a person appointed by him/her);</li> <li>Executive Director of RM “CARITAS-SPES”;</li> <li>-</li> <li>-</li> </ul>
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Before forming the Commission, the PRISS checks all its potential members for the absence of a conflict of interest. If there is suspicion of the latter, the PRISS addresses the President of the Mission directly with a request to replace one of the members of the Commission at the President's discretion.

After verification and absence of a conflict of interest, each member of the Commission personally signs a standard declaration (disclaimer) of the established form (provided by the National PRISS). This procedure is carried out separately for the handle of each specific complaint.

In parallel with the process of creating the Commission, the PRISS informs the parties about the alleged violation and, if necessary, reports it to the Chair of the Board of RM "CARITAS-SPES" and informs the Church in the person of the safeguarding officer in the diocese in whose territory the alleged incident occurred.

The Commission appoints a Chair of the Commission from among its members, and the functions of secretary are performed by the PRISS. Meetings of the Commission are documented in the form of minutes marked: "For internal use".

The Commission appoints an appropriate Specialist in Information Analysis and Investigation Procedure (SIAIP) who has undergone specialized training in the field of collecting relevant information.

The SIAIP begins collecting additional information for presentation to the Commission. The maximum period for conducting the inquiry (clarification of circumstances) is one calendar month.

Based on the collected additional materials, the SIAIP prepares a report on the results of the conducted investigation and informs the PRISS of its completion. On this basis, the PRISS initiates a general meeting of the Commission in the composition set out above, where the SIAIP presents his/her report.

Based on the collected information, the Commission makes a decision, which is documented in the form of minutes signed by all members of the Commission.

After the Commission has made a decision and signed the relevant minutes, the PRISS informs the parties to the conflict and, if necessary, the Chair of the Board and the President of RM "CARITAS-SPES" and the Church in the person of the safeguarding officer in the diocese in whose territory the alleged incident occurred (or the information on the incident proved unfounded) of the decision made.

The PRISS enters information on the results of the review of the complaint and/or the decision made by the Commission into the Excel registration and complaint log table.

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### **8.3. Powers and operating algorithm of Specialists in Information Analysis and Investigation Procedure (SIAIP)**

At the stage of appointing the SIAIP, the Commission examines the issue of absence of a conflict of interest, after which the SIAIP signs the relevant declaration (disclaimer) of the established form.

Under the guidance of the Commission, the SIAIP develops an action plan in each specific case and, on the instructions of the Commission, conducts preliminary data collection regarding the received complaint.

Based on the collected information, he/she conducts an objective, fair, thorough, impartial, and timely investigation of the complaint. At the same time, in accordance with the memoranda signed between the National Office of RM "CARITAS-SPES" and the diocesan centers, the SIAIP has the right and is obliged to obtain relevant evidence and information on site. At the same time, the SIAIP:

- carries out inspection and examination of evidence/documents for conclusions;
- organizes and conducts interviews with the affected person (complainant), witnesses of the incident, and other parties to the conflict;
- documents all stages of the investigation.

After completion of the investigation, the SIAIP prepares professional investigation reports with his/her own recommendations (exclusively within the limits of the powers granted), which he/she presents at a meeting of the Commission.

#### **8.4. Procedure for decision-making by the Commission for the Review of Sensitive Complaints and monitoring of its implementation.**

Members of the Commission for the Review of Sensitive Complaints (CRSC) convene at the initiative of the National PRISS no later than 48 hours after the moment of receipt of information from the PRISS about a complaint of the relevant level. The format of meetings – in person or online – is determined in accordance with the current situation in the regions of Ukraine, but preference is given to the in-person format.

Before the first meeting begins, all members of the CRSC sign (each individually) a declaration on the absence of a conflict of interest (disclaimer) of the established sample (provided by the National PRISS).

During the first meeting, the members of the CRSC impartially, comprehensively, and in detail handle each sensitive complaint received through the National PRISS, regardless of the channel through which it was received. Based on the review, the CRSC appoints the SIAIP within whose competence the investigation of the specific complaint falls and determines the time frames for conducting the investigation and providing conclusions by the SIAIP. At the same time, the CRSC examines the issue of the presence/absence of a conflict of interest of the SIAIP, which is recorded in the relevant minutes. If there is suspicion of such a conflict, the SIAIP shall be replaced.

The CRSC may provide recommendations to the supervisor of the respondent regarding actions to minimize the respondent's influence on the investigation process, as well as to minimize harm to the respondent and the complainant (alleged victim/victims) and ensure compliance with confidentiality and the presumption of innocence.

Members of the CRSC participate in meetings of the Commission for the Review of Sensitive Complaints (CRSC) of the Safeguarding system of RM "CARITAS-SPES", which are convened on the basis of the results of the conducted inquiries (clarification of circumstances) for issuing the relevant decision (the format of meetings – in person or online – is determined in accordance with the current situation in the regions of Ukraine, but preference is given to the in-person format).

Based on the materials of the conducted inquiries (clarification of circumstances), make decisions regarding the presence/absence of grounds for the received complaint and the degree of guilt/innocence of the involved persons. The decision is formalized in the form of the relevant minutes. At the same time, the CRSC may provide recommendations regarding the actions of the respondent's supervisor both in the event of confirmation of the accusation and in the event of refutation of the accusations.

After the implementation of the CRSC decision (or disregard of it) in accordance with this Procedure at the level of the committed (or unconfirmed) violation, the National PRISS informs the members of the CRSC about the measures taken (or not taken) on the ground. If the members of the CRSC recognize the measures taken (or not taken) as inconsistent with the decisions of the CRSC, each member of the Commission has the right to initiate an additional meeting to handle the situation that has arisen and prepare an appropriate appeal to the President of RM "CARITAS-SPES".

### 8.5. Informing the parties to the conflict

Informing the competent bodies (church leadership and management of the relevant level of RM “CARITAS-SPES”), as well as the affected persons (complainants), takes place according to the following schemes:

<p>the violation occurred in the National Office, in a diocesan center of the Mission, or in a center directly subordinate to the National Office.</p>	<p>- after the CRSC has made a decision, the PRISS informs the following parties of the decision: the President of the Mission and the Church in the person of the safeguarding officer in the diocese in whose territory the incident occurred; the diocesan director or the Director of a separate RM “CARITAS-SPES” center (in the case of the National Office – the Executive Director of RM “CARITAS-SPES”) implements the decision; after the CRSC receives information on implementation of the decision, the PRISS informs the following parties of the implementation of the decision: the President of the Mission and the Church in the person of the safeguarding officer in the diocese in whose territory the incident occurred, and also, where possible (non-anonymous complaint) – the affected party (complainant);</p> <p>-</p>
<p>the accusation of the violation was made against the diocesan director:</p>	<p>- after the CRSC has made a decision, the PRISS informs the Moderator from the Conference of Roman Catholic Bishops of Ukraine, who concurrently (by office) is the Chair of the Mission’s Board, of the decision. The decision is implemented by the President of the Mission (possibly – the Church in the person of the safeguarding officer in the diocese) The PRISS, where possible (non-anonymous complaint), informs the affected party (complainant) of the decision of the CRSC and of the transfer of powers for implementation of the decision to the higher church level;</p> <p>-</p>
<p>the accusation of the violation was made against the Executive Director or the President of RM “CARITAS-SPES”.</p>	<p>- after the CRSC has made a decision, the PRISS informs the Chair of the Conference of Roman Catholic Bishops of Ukraine of the decision and, where possible (non-anonymous complaint), informs the affected party (complainant) of the CRSC’s decision and of the transfer of powers for implementation of the decision to the level of the Conference;</p>

<p>the complaint concerned issues of abuse in the financial-economic sphere:</p>	<p>- after the CRSC has made a decision, the PRISS informs the parties of the decision: the President of the Mission and the Church, in the person of the moderator from the Conference of Bishops, who concurrently (by office) is the Chair of the Mission's Board – the diocesan director or the Director of a separate RM "CARITAS-SPES" center implements the decision (in the case of abuse in the National Office, implementation of the decision is monitored by the moderator from the Conference of Bishops, who concurrently (by office) is the Chair of the Mission's Board) after the CRSC receives information on implementation of the decision, the PRISS informs the parties of the implementation of the decision: the President of the Mission and the Church in the person of the safeguarding officer in the diocese in whose territory the incident occurred, and also, where possible (non-anonymous complaint) – the affected party (complainant).</p> <p>-</p>
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## **9. APPEAL PROCEDURE**

After informing the parties to the conflict (the affected person and/or complainant, the accused/acquitted employee of RM “CARITAS-SPES”), each of them may file an appeal complaint against the decision of the CRSC.

An appeal complaint shall be submitted in writing within one month personally to the President of RM “CARITAS-SPES”, regardless of the place where the alleged offense occurred and the level (position) of the RM “Caritas-Spes” employee against whom the accusation is made.

The appeal must be considered by the President of RM “CARITAS-SPES” no later than within thirty days, of which he personally informs the complainant (victim) through the channels indicated by the complainant (victim) in the appeal submission.

If the accusation is made against the President of RM “CARITAS-SPES”, the appeal complaint shall be submitted in the name of the Chair of the Conference of Roman Catholic Bishops of Ukraine.

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## 10. SUPPORT FOR PERSONS WHO HAVE EXPERIENCED A SENSITIVE INCIDENT

RM “CARITAS-SPES” respects the needs and wishes of people who have experienced a sensitive incident. In view of this, employees of the Mission at the relevant level, first of all the direct supervisor of the perpetrator of the incident, redirect the affected person to specialized free or paid services that provide legal and/or appropriate medical/psychological assistance.

At the same time, any person affected by the investigation process also has the opportunity to receive support in the following areas:

- access to medical and psychosocial assistance through an internal or external specialist;
- for staff – practical support during the investigation, ranging from support from the HR manager regarding informing colleagues about the person’s absence from work, as well as assistance in preparing the return to work, with regular information on next steps;
- also for staff – access to a coach/mentor to build confidence in returning to work;
- if necessary – access to training, for example in providing psychological first aid, to increase resilience;
- ensuring protection by means available to RM “CARITAS-SPES” (at the local or national level), if the person is in danger

## **11. ANNEXES.**

### **11.1. Terms of Reference for the Specialist in Information Analysis and Investigation Procedure (SIAIP) of the Safeguarding system of RM "CARITAS-SPES"**

#### **GOALS AND TASKS OF THE SIAIP:**

The Specialist in Information Analysis and Investigation Procedure is a person authorized to conduct an inquiry into a sensitive complaint, collect necessary (including additional) information, and provide the results of his/her own inquiry (without expressing evaluative judgments) for consideration by the members of the Commission for the Review of Sensitive Complaints (CRSC).

Members of the Commission for the Review of Sensitive Complaints (CRSC) are independent in the performance of their duties, but act in close cooperation with the Person Responsible for the Implementation of the Safeguarding System (PRISS) at the national level, as well as with the higher leadership of the Mission (Board) and the Conference of Roman Catholic Bishops of the Latin Rite in Ukraine.

#### **GOAL:**

Conducting a prompt, comprehensive, and impartial inquiry based on the materials of a sensitive complaint received through all channels provided for by the Safeguarding system of RM "Caritas-Spes".

#### **TASKS:**

1. Conducting preliminary collection of data regarding the received complaint.
2. Conducting, on the basis of the collected information, an objective, fair, thorough, impartial, and timely investigation of the complaint. At the same time, in accordance with the memoranda signed between the National Office (NO) of RM "CARITAS-SPES" and the diocesan centers, the SIAIP has the right and obligation to obtain relevant evidence and information on site. At the same time, the SIAIP:
  - carries out inspection and examination of evidence/documents for conclusions
  - organizes and conducts interviews with the affected person (complainant),
  - witnesses of the incident and other parties to the conflict;
  - documents all stages of the investigation.
3. Preparing, based on the results of the inquiries, reports on the professional investigation with his/her own recommendations (exclusively within the limits of the powers granted).
4. Presentation of the professional investigation report at a meeting of the Commission for the Review of Sensitive Complaints of RM "CARITAS-SPES".

**DUTIES:**

1. To proceed promptly with the performance of assigned tasks, upon the first request of the Commission for the Review of Sensitive Complaints (CRSC) of the Safeguarding system of RM "CARITAS-SPES", in accordance with the Procedure of Receiving and Handling Complaints and Feedback of RM "CARITAS-SPES".
2. Sign a disclaimer on the absence of a conflict of interest.
3. Impartially, comprehensively, and thoroughly review each sensitive situation, avoiding subjective assessments during the investigation.
4. Strictly adhere to the principle of the presumption of innocence, which is a fundamental legal principle in the treatment of persons against whom accusations of a sensitive nature have been made (a complaint has been filed).
5. Determine a clear time frame for handling the circumstances, composition, consequences, etc. of each sensitive situation assigned for inquiry.
6. Strictly adhere to the action plan developed and approved by the CRSC, which defines the scope, time frames, and directions of the SIAIP's activities in the field of information gathering.
7. Within the prescribed time frame, prepare, based on the results of the inquiries, a written report on the professional investigation with your own recommendations (exclusively within the limits of the powers granted) and present it during the relevant meeting of the CRSC members.
8. Adhere to the principle of non-disclosure of the secrecy of investigative actions and the results of one's own inquiries.

**11.2. DECLARATION OF ABSENCE OF CONFLICT OF INTEREST**

**Surname, first name:**

1. Are the participants in the situation under consideration within case No.     your relatives, close acquaintances, colleagues? Do you, or do your closest relatives, have personal close contacts of various kinds (including family, financial, professional, work-related, etc.) with persons who are participants in the situation under consideration within case No.     ? Do you or your immediate family or associated organization have any financial interest that could arise as a result of any decisions and conclusions regarding the situation under consideration within case No.     ? In particular, do you or any of your immediate family or associated business have shares or other investments in advocates/supporters / companies? (for example, holding or subsidiary companies).

If yes, please specify any interest known to you.

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2. Do you have professional or financial involvement in work with any of the possible participants in the situation under consideration within case No.     , possible advocates/supporters / companies?

If yes, please specify the relationship and whether, in your opinion, this may lead to an actual or perceived conflict of interest.

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3. Do you or anyone in your immediate family or associated organization have any monetary or other interests that may cause an actual or potential conflict of interest with your role?

If yes, please formulate below.

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*I undertake to update this disclosure document regarding any conflict, potential conflict, or apparent conflict that may arise during the shortlisting or tender procedure. If any conflict compromises me, I agree to abstain from any relevant decision.*

SIGNATURE     DATE

