

CARITAS-SPES UKRAINE

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ORDER

**On approval of the
Safeguarding Policy
of the RELIGIOUS MISSION "CARITAS-SPES" /CARITAS-SPES/ ROMAN CATHOLIC CHURCH IN UKRAINE
(hereinafter – "RM "CARITAS-SPES" RCC in Ukraine", "Caritas-Spes Ukraine")**

[handwritten date] 28.05.2026, Kyiv

No. 47/26

For the purpose of the effective implementation of the Safeguarding Policy of the RELIGIOUS MISSION "CARITAS-SPES"/CARITAS-SPES/ROMAN CATHOLIC CHURCH IN UKRAINE (hereinafter – the "Mission"),

I hereby order:

1. As of 28.05.2026, to approve the Safeguarding Policy of the RELIGIOUS MISSION "CARITAS-SPES" (hereinafter – the "Policy").
2. The Safeguarding Manager – to familiarize the Mission's staff with the contents of the Policy.
3. I reserve control over the execution of this Order for myself.
4. This Order shall take effect as of 28.05.2026.

Executive Director

of the Religious Mission "CARITAS-SPES"/CARITAS-SPES/

Roman Catholic Church in Ukraine

[signature]

V.V. Hrynevych

[Official round seal of the Religious Mission "Caritas-Spes"/CARITAS-SPES/ Roman Catholic Church in Ukraine, Kyiv]

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APPROVED:

Executive Director

[signature]

Vyacheslav HRYNEVYCH

[Official round seal of the Religious Mission "Caritas-Spes" /CARITAS-SPES/ Roman Catholic Church in Ukraine, Kyiv]

"28" [month, handwritten] 2026

**Safeguarding Policy
of the RELIGIOUS MISSION "CARITAS-SPES" /CARITAS-SPES/ ROMAN CATHOLIC
CHURCH IN UKRAINE**

(hereinafter – "RM "CARITAS-SPES" RCC in Ukraine", "Caritas-Spes Ukraine")

Safeguarding Policy
of the RELIGIOUS MISSION “CARITAS-SPES” /CARITAS-SPES/ ROMAN CATHOLIC CHURCH IN
UKRAINE
(hereinafter – “RM “CARITAS-SPES” RCC in Ukraine”, “Caritas-Spes Ukraine”)

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Information about the Policy

Title:	Safeguarding Policy of RM "CARITAS-SPES" RCC in Ukraine
Approved by:	Order of the Executive Director No. ____ dated " ____ " _____ 2026
Date of approval:	" ____ " _____ 2026
Date of next review:	no later than 3 years from the effective date, and also in the event of significant changes in the legislation of Ukraine
Translated versions:	

Key Messages

Why do we have this policy?	Caritas-Spes Ukraine is committed to ensuring the safety of the participants in our programmes and of our staff in the workplace from exploitation, abuse, and harassment, including of a sexual nature. Caritas-Spes Ukraine recognizes the power imbalance inherent in the nature of our work and how this can create opportunities for abuse or exploitation. This policy also recognizes the need to take into account the specific aspects of protecting children and vulnerable adults, and reaffirms our commitment to ensuring their safety and protection.
Who does this policy apply to?	All staff and partners Members of the Caritas-Spes Ukraine Board Suppliers and service providers
What key points do I need to know?	Definitions – Section 3 Responsibilities of staff and partners – Section 5
What key actions do I need to take?	Study, understand, and apply this policy Set an example of ethical and moral conduct consistent with the standards set out in this policy Immediately report concerns or suspicions regarding safeguarding through the channels specified in this policy
Where can I find more information?	Further information on relevant policies and procedures can be obtained by contacting the Safeguarding Manager

1.0 Purpose

Caritas-Spes Ukraine strives to create and maintain an environment that reflects its core values and actively prevents any forms of abuse, mobbing, bullying, discrimination, exploitation, and harassment. All staff of Caritas-Spes Ukraine¹ and partners² are expected to protect the dignity of every person they encounter, adhering to the highest standards of personal and professional conduct at all times. They must act honestly, foster respectful professional communication, and take full responsibility for protecting those in their care and the communities they serve.

Caritas-Spes Ukraine recognizes that children are more vulnerable to abuse, discrimination, and exploitation due to their dependence on others and the power imbalance with adults. Caritas-Spes Ukraine is committed to child protection and works to be an organization that is safe for children.

2.0 Scope of Application

This policy applies to the following categories of legal entities and individuals:

1. All staff and partners, including volunteers, interns, and consultants
2. Representatives of authorities related to the activities of Caritas-Spes Ukraine
3. Partners, suppliers, contractors, and service providers

This policy applies to all the legal entities and individuals listed above, both in their professional and personal capacities, in cases where their conduct may affect the reputation or activities of Caritas-Spes Ukraine and/or the Caritas Confederation. For the purposes of this policy, members of the governing body shall hereinafter be referred to as "partners".

This Policy is in effect throughout the territory of Ukraine, as well as beyond its borders where RM "CARITAS-SPES" RCC in Ukraine carries out its activities (in particular, within humanitarian corridors, evacuation missions, and assistance programmes for Ukrainian refugees and IDPs). The provisions of this Policy apply subject to the requirements of the current legislation of Ukraine, in particular:

- the Constitution of Ukraine;
- the Civil, Family, and Criminal Codes of Ukraine and the Code of Ukraine on Administrative Offences;
- the Labour Code of Ukraine;
- the Law of Ukraine "On the Protection of Childhood";
- the Law of Ukraine "On Prevention and Combating Domestic Violence";
- the Law of Ukraine "On Ensuring Equal Rights and Opportunities for Women and Men";
- the Law of Ukraine "On the Principles of Preventing and Combating Discrimination in Ukraine";
- the Law of Ukraine "On Personal Data Protection";
- the Law of Ukraine "On Combating Trafficking in Human Beings";
- Resolution of the Cabinet of Ministers of Ukraine No. 658 of 04.06.2025 "On Approval of the Model Programme for the Prevention of Violence and Cruel Treatment of Children" and other by-laws.

In the event of a conflict between the provisions of this Policy and the mandatory norms of the legislation of Ukraine, the norms of the legislation of Ukraine shall apply.

¹ "Staff" means all employees, volunteers, interns, and members of the governing bodies of Caritas-Spes Ukraine.

² The term "partners" means the consultants and contractors of Caritas-Spes Ukraine.

3.0 Definitions

Safeguarding: the responsibility of organizations to prevent, actively manage, and reduce the risk of abuse, bullying, discrimination, exploitation, and harassment, and to respond appropriately to reports of violations. PSEAH (Protection from Sexual Exploitation, Abuse, and Harassment) falls under this umbrella term.

Child: any person under the age of 18 (in accordance with Article 1 of the Law of Ukraine "On the Protection of Childhood" and Article 1 of the UN Convention on the Rights of the Child). All persons under 18 enjoy the same level of protection regardless of citizenship, residency status in Ukraine, or other circumstances.

Beneficiary (programme participant): a natural person who receives humanitarian, social, psychological, legal, or other assistance from RM "Caritas-Spes Ukraine" within the framework of its programmes and projects, including IDPs, refugees, persons affected by the armed conflict, low-income families, unaccompanied children, and children separated from their families.

Vulnerable adult: persons aged 18 and over who are at greater risk of significant harm due to factors such as sex, age, mental or physical health, or as a result of poverty, inequality, or experiencing forced displacement or crisis.

Safeguarding concern or allegation: a suspicion or allegation that a breach of this policy has occurred or may occur. This includes reports from survivors of violence.

Respondent: a person accused of violating one or more provisions of this policy.

Victim/survivor: a person who (allegedly) has suffered violence, abuse, discrimination, exploitation, and harassment.

Whistleblower/reporting person: a person who reports suspected or actual violations and has reasonable grounds to believe that the information is true at the time of reporting.

4.0 Guiding Principles

Our approach to safeguarding is based on the Constitution of Ukraine, the current legislation of Ukraine listed in Section 2.0 of this Policy, a number of key international conventions³ (in particular, the UN Convention on the Rights of the Child, the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence — the Istanbul Convention, ratified by Ukraine in 2022), as well as on the provisions of the Holy See (canon law⁴, *Vos estis lux mundi*⁵, etc.) regarding the resolution of such issues. Caritas-Spes Ukraine also strives to adhere to the Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel, the UN Secretary-General's Bulletin ST/SGB/2003/13 on PSEA, the standards of the CHS Alliance, IASC, and the sectoral principles of Caritas Internationalis.

The core safeguarding principles of Caritas-Spes Ukraine include:

³ Including the Convention on the Rights of the Child, ratified by the Holy See in 1990, and the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution, and child pornography, ratified by the Holy See in 2001.

⁴ Law No. CCXCVII "On the Protection of Minors and Vulnerable Persons" of 2019 and Book VI of the Code of Canon Law, 2021, canon 1395 §3 and canon 1398 §2.

⁵ 2023

Do no harm: Caritas-Spes Ukraine will take measures to prevent and mitigate any adverse effects of its actions on affected populations and on those working to implement these measures.

Victim-centred approach⁶: Caritas-Spes Ukraine prioritizes the rights and best interests of every victim, ensuring that they are treated with dignity and respect, while promoting their emotional and physical safety and minimizing the risk of further harm.

Zero tolerance for inaction: Caritas-Spes Ukraine applies a zero-tolerance policy not only to exploitation, violence, harassment, and other safeguarding violations, but also to inaction regarding their prevention, reporting, or appropriate response, as well as to retaliation against victims, whistleblowers, or informants. Every allegation or report of an incident will be assessed, investigated if necessary, and appropriate action taken thereafter.

5.0 Responsibilities of Staff and Partners

5.1 Prohibited Conduct

Persons to whom this policy applies (Section 2.0) are strictly prohibited from knowingly participating in any activity that could reasonably be foreseen to cause harm, exploitation, or abuse to another person. Caritas-Spes Ukraine also strives to maintain a professional working environment free from intimidation, hostility, humiliation, bullying, or any other conduct that undermines work effectiveness or violates a person's dignity⁷. All staff and partners are expected to treat each other with respect and to refrain from creating or contributing to a hostile working atmosphere. Prohibited conduct includes, but is not limited to, the following:

Abuse⁸ — is any action or omission that harms the safety, well-being, dignity, or development of a person. Abuse may also occur online or via mobile technologies. It often involves persons who hold positions of responsibility or trust, such as programme staff or religious leaders.

Abuse may take the following forms:

1. Physical abuse: intentional or reckless use of physical force that causes or may cause injury or suffering. Examples include hitting, shaking, kicking, pinching, pushing, grabbing, burning, female genital mutilation, and other forms of physical mistreatment⁹.

⁶ For further information, see Annex III – Definitions and Principles of the Victim/Survivor-Centred Approach, developed by IASC.

⁷ For a description of the standards of professional conduct of Caritas-Spes Ukraine on safeguarding, see Annex I; a brief description of the roles and responsibilities of staff, partners, and representatives in relation to this policy is set out in Annex IV.

⁸ Note on spiritual abuse: Spiritual abuse is a complex reality which, although it does not constitute a separate criminal category with a specific legal definition in the Code of Canon Law (CIC), is inextricably linked to the abuse of power. In the canonical sphere, abuse of power is classified as an offence and is dealt with predominantly under the heading of "abuse of office or ecclesiastical authority". Acts constituting spiritual abuse — such as manipulation, coercive control, or exploitation within the context of spiritual mentorship or accompaniment — generally fall under existing canonical offences, in particular the offence of abuse of office (canon 1389 CIC), or under other specific provisions contained in Book VI of the Code, which is devoted to sanctions in the Church. The applicable penalties vary depending on the severity of the offence and the circumstances of the specific case. It is important to note that, while spiritual abuse may occur in various contexts, including within the activities of "Caritas" or spiritual direction, it is not limited to acts by priests or bishops, but may also be committed by members of religious orders or lay persons who exercise certain functions of authority or spiritual influence.

shaking, kicks, pinching, pushing, grabbing, burning, female genital mutilation, and other forms of physical mistreatment.

2. Emotional abuse: persistent or serious emotional mistreatment or rejection that undermines a person's behaviour, emotional state, or development. Examples include humiliating punishment, threats, or denial of care and love.

3. Sexual abuse: actual or threatened physical intrusion of a sexual nature, committed by force, coercion, or under conditions of inequality. This includes rape, sexual assault, molestation, and other forms of non-consensual sexual activity. Any sexual activity with a child (under 18) is always considered sexual abuse.

4. Neglect/negligent treatment: failure — whether deliberate or through negligence — to meet the basic physical or psychological needs of a child or person, taking into account the context and available resources. Examples include lack of supervision, an unsafe environment (e.g. access to weapons or hazardous objects), refusal to provide adequate medical care, or unsafe working practices.

Attempted abuse — is conduct that indicates an intent to commit abuse, even if the act itself did not occur. This often includes grooming behaviour, where a person builds trust with a child, a vulnerable adult, or their caregivers with the aim of subsequent exploitation. Examples:

- Excessive or unjustified attention to a child or vulnerable adult
- Offering gifts, money, alcohol, drugs, or other incentives
- Pressuring or encouraging inappropriate or romantic relationships
- Introducing sexual content through conversations, materials, or pornography

Bullying¹⁰ — is the mistreatment of one or more persons by one or more perpetrators. It includes threats, intimidation, humiliation, persistent unwanted teasing, abuse of power, deliberate obstruction of work, sabotage, or harassment. To qualify as bullying, the conduct generally must be persistent, repeated, and targeted, taking into account both severity and frequency.

Discrimination — is any unfair treatment or arbitrary distinction based on characteristics such as race, sex, gender, sexual orientation, religion, nationality, ethnic origin, disability, age, language, or social origin. It may occur as an isolated incident or manifest as harassment affecting an individual or a group.

Exploitation — is the abuse of power, trust, or vulnerability for the purpose of obtaining personal, social, political, or financial benefit. Staff and partners of Caritas-Spes Ukraine must never use their position to deny services, demand payment, provide preferential treatment, or obtain any form of benefit.

Forms of exploitation include:

1. Sexual exploitation: any actual or attempted abuse of power or vulnerability for sexual purposes. This includes obtaining financial, social, or political benefit from the sexual exploitation of another person. Coercion into sexual activity in exchange for assistance, services, or opportunities is strictly prohibited. Any sexual exploitation of a child is considered sexual abuse.

⁹ In international humanitarian law (IHL), "cruel treatment" means acts that cause serious physical or mental suffering, including torture and cruel, inhuman, or degrading treatment. It covers a whole range of harmful acts that violate the dignity and well-being of individuals, particularly those affected by armed conflict.

¹⁰ For further information, see Annex II "Guidance on Bullying".

2. Child labour: work that deprives children of their childhood, dignity, and the opportunity to develop, or that harms their physical, mental, or emotional well-being. This includes work that: does not serve the best interests of the child¹¹, is hazardous, exploitative, or interferes with compulsory education.

Staff and partners of Caritas-Spes Ukraine, both in a professional and personal capacity, must:

- Comply with both national legislation and international standards regarding compulsory education, child labour, and fair working conditions
- Never knowingly purchase goods or services produced using child labour
- Never exploit or benefit from child labour in any form
- Never employ children under the age of 15¹², except in cases expressly provided for by Article 188 of the Labour Code of Ukraine (employment of persons aged 15 with the consent of one of the parents or a person acting in loco parentis; engagement of pupils aged 14 in light work outside school hours with the consent of one parent and provided that it does not harm health or interfere with the learning process);
- Never engage persons under 18 in work listed in the List of Heavy Work and Work with Harmful and Dangerous Working Conditions in which the employment of minors is prohibited (Order of the Ministry of Health of Ukraine No. 46);
- Never engage persons under 18 in night work, overtime work, or work on days off (Article 192 of the Labour Code of Ukraine);
- When cooperating with international Caritas-Spes Ukraine programmes, additionally be guided by ILO Convention No. 138 and ILO Convention No. 182.

Caritas-Spes Ukraine must not employ children (under 18) full-time on a permanent basis or fund programmes involving such employment.

3. Trafficking in human beings: the recruitment, transportation, transfer, harbouring, receipt, or removal of organs of persons through threats, coercion, fraud, abduction, deception, abuse of power or vulnerability, or the giving/receiving of payments or benefits with the aim of controlling a person for the purpose of exploitation.

Staff and partners of Caritas-Spes Ukraine, both in a professional and personal capacity, must:

- Never knowingly purchase goods or services produced through human trafficking or forced labour
- Never exploit or benefit from forced labour in any form

4. Transactional sex: the exchange of money, goods, services, or other benefits (such as housing, food, protection, or social advantages) for sexual services. This prohibition applies regardless of whether prostitution or the purchase of sexual services is legal in the local context. This is prohibited both during and outside working hours, and in any location (during leave, at one's place of residence, or during a business trip or travel).

¹¹ As set out in Article 3 of the Convention on the Rights of the Child.

¹² In accordance with ILO Convention No. 138, Caritas-Spes Ukraine prohibits the employment of persons under 15 years of age. "Light work" may be permitted from age 14, provided it does not harm the child's health or development and does not interfere with compulsory schooling.

Harassment – is conduct that:

- a) is directed at an individual or group of individuals,
- b) demeans, threatens, or offends, and
- c) creates a hostile or offensive environment

Harassment may be verbal, written, or physical. Harassment is often — but not always — distinguished from bullying, as it typically involves targeting people based on aspects of their identity, such as race, religion, sex, marital status, age, origin, or mental health status.

1. Sexual harassment is a specific form of harassment related to a person's sex or gender. It is defined as unwanted conduct or acts of a sexual nature. Examples include sexual advances, requests for sexual favours, inappropriate sexual jokes or comments, indecent looks, displaying pornography, or offensive messages. Sexual harassment may occur in person, online, by phone, or through other means of electronic communication.

Relationships with programme participants — are sexual or romantic relationships between staff or partners of Caritas-Spes Ukraine and programme participants. Such relationships are categorically discouraged and strictly prohibited if they involve any form of abuse of power or misuse of position. Staff and partners must never use their role, influence, or access to programme participants or community members to demand, initiate, or enter into such relationships. Staff and partners are obligated to report any potential or actual relationships that may raise such concerns to their supervisor or the safeguarding manager.

Special risks in the context of armed conflict and the humanitarian response in Ukraine

Given the specific nature of the activities of Caritas-Spes Ukraine, the following are considered a particular form of abuse:

- making the provision of humanitarian assistance (goods, vouchers, cash payments, medicines, clothing, housing, transport) conditional on a beneficiary performing any personal, sexual, romantic, labour, or other services not provided for by the programme;
- any form of “jumping the queue” or preferential treatment of individual beneficiaries in exchange for informal gratitude, gifts, or personal favours;
- interacting with an unaccompanied child or a child separated from their family without the involvement of the children's services and other authorized bodies, in violation of the Procedure for guardianship and custody authorities' activities related to the protection of children's rights;
- disclosing the location, route, contacts, or personal data of IDPs, persons affected by the conflict, or other vulnerable beneficiaries to third parties, including on social media, in the media, or in fundraising materials;
- photographing or filming beneficiaries without written informed consent (for children — the consent of parents or other legal representatives), specifying the purpose, method of publication, and storage period;

5.2 Sexual and Romantic Relationships Among Members of the Work Team

Caritas-Spes Ukraine does not prohibit consensual romantic or sexual relationships between representatives of the work and corporate environment. However, such relationships must be voluntary, free of any form of coercion, exploitation, or abuse of power or position, and they must not interfere with the performance of professional duties or disrupt the work and corporate environment.

Caritas-Spes Ukraine recognizes that a power imbalance may exist between persons holding supervisory, managerial, or leadership positions and those under their direct or indirect supervision. Therefore, romantic or sexual advances by a manager, coordinator, or supervisor towards a subordinate — or anyone in their management chain — will be treated with particular attention.

In order to ensure transparency and reduce the risk of a perceived or actual violation, Caritas-Spes Ukraine strongly urges all staff and partners to report any romantic or sexual relationships with other staff or partners to the Human Resources (HR) Department. If such relationships involve a manager, supervisor, or coordinator and a subordinate under their direct or indirect management, reporting to both the HR department and their immediate supervisor is mandatory.

Failure to disclose relationships involving a manager, coordinator, or supervisor and their direct or indirect subordinate may constitute a violation of this policy and lead to investigation and further disciplinary action.

All reports will be handled confidentially. The purpose of reporting is to protect the individuals involved and to reduce the risk of perceived or actual violations, including conflicts of interest, abuse of power, or preferential treatment.

Caritas-Spes Ukraine will consider and take appropriate measures to address real or perceived conflicts of interest arising from workplace relationships. Such measures may include adjusting reporting lines, redistributing supervisory duties, or introducing additional controls to ensure transparency and fairness.

5.3 Reporting Safeguarding Incidents

5.3.1 What to Report

All staff and partners of Caritas-Spes Ukraine must report any suspicions, allegations, or concerns regarding abuse; attempted abuse; exploitation; sexual harassment; or relationships with programme participants, direct¹³ and indirect subordinates, managers, supervisors, or coordinators¹⁴. Failure to report such concerns may constitute a breach of this policy and the Caritas-Spes Ukraine Code of Conduct and may lead to investigation and further disciplinary action.

Abuse; attempted abuse; exploitation; sexual harassment; and relationships with programme participants, direct and indirect subordinates, managers, coordinators, or supervisors must be reported when:

- there is evidence or suspicion
- an allegation, complaint, or concern has been received from a third party
- the victim reports the abuse or exploitation directly to a Caritas-Spes Ukraine staff member or partner

Staff and partners are strongly encouraged to report all other prohibited acts set out in this policy that they have witnessed, suspect, or have been informed of.

13 Direct subordinates are staff or partners who report directly to a manager, coordinator, or supervisor within the organizational hierarchy. Indirect subordinates are staff or partners who, although not under the direct supervision of this person, fall under their broader line of authority through lower levels of management.

14 These mandatory reporting requirements are consistent with Vatican Law No. CCXCVII on the Protection of Minors and Vulnerable Persons.

When reporting a concern, staff and partners must provide as much relevant detail as they know¹⁵. However, they must not attempt to investigate the matter themselves, demand explanations from the alleged victim or perpetrator, or gather additional information. Staff and partners are prohibited from independently conducting interviews, interrogations, evidence collection, or any actions that could affect the safety of potentially affected persons or the integrity of the subsequent fact-finding process. This could harm further investigations and put individuals at additional risk of harm.

It is important to note that reporting potential safeguarding incidents within the organization does not limit the right — and in some cases the obligation — of individuals to also report such matters to the competent civil authorities and/or the relevant church authorities, in accordance with canonical norms and procedures.

If an incident concerns a child (a person under 18) and signs of violence, mistreatment, or exploitation by staff of the organization or third parties are identified, reporting to the safeguarding manager is the first priority, but does not replace the mandatory external reporting required by the legislation of Ukraine. In particular, within a period not exceeding 3 (three) hours from the moment the signs are identified, the person must report to:

- the authorized unit of the National Police of Ukraine (tel. 102);
- the children's services at the place where the incident was discovered or at the child's place of residence;
- if necessary — the State Service for Children's Affairs via the electronic form on its official portal;
- one of the parents or other legal representatives of the child, except in cases where they are the alleged perpetrators.
- In cases where signs of human trafficking are identified, the national anti-trafficking call centre (tel. 1547) and the National Police (tel. 102) must be additionally informed.

5.3.2 Reasonable Suspicion

Any person reporting a safeguarding incident or a suspicion of misconduct must have reasonable grounds to believe that the information is true and constitutes a violation of this policy. If the reporting person has a personal interest in the matter, this must be disclosed from the outset. Submitting a report known to be false, or disclosing information with the intent to cause harm, is a violation of the Procedure for Receiving and Reviewing Complaints and Feedback of RM "CARITAS-SPES" RCC in Ukraine and this Policy, and may lead to disciplinary action, up to and including dismissal.

5.3.3 How to Submit a Report

Reports must be submitted through the following channels:

- The form on the website (including anonymously)
- In person to the safeguarding manager
- +38 (067) 274-71-15
- Email: safeguarding@caritas-spes.org
- The safeguarding coordinator at the diocesan level

Safeguarding incidents concerning persons from external organizations or bodies that are not members must be reported to the safeguarding manager for referral to the relevant organization.

¹⁵ Please refer to Annex VII "Safeguarding Incident Report Form" for further guidance on what to include in a safeguarding incident report.

5.4 Responding to Safeguarding Incidents

5.4.1 Assessment and Fact-Finding

All reported safeguarding cases will be reviewed and resolved in accordance with the Procedure for Receiving and Reviewing Complaints and Feedback of RM "CARITAS-SPES" RCC in Ukraine and the Procedure for Conducting Fact-Finding on Violations of Safeguarding Policies of RM "CARITAS-SPES" RCC in Ukraine. All staff and partners of Caritas-Spes Ukraine are obligated to fully cooperate during any fact-finding process regarding safeguarding incidents.

Reports on safeguarding incidents will be reviewed by the Chair of the Sensitive Complaints Review Commission or the Executive Director of Caritas-Spes Ukraine. The person who reported the incident may not be informed of the steps taken to assess the allegation, whether an investigation will be conducted, or the closure of the case. For reasons of confidentiality, if the person who reported the incident is not the victim, they will not receive detailed information about the outcome of the case.

Caritas-Spes Ukraine is committed to conducting investigations that are safe, confidential, timely, thorough, and professional, and that comply with the CHS Alliance Guidelines for Investigations¹⁶.

Caritas-Spes Ukraine commits to:

- Treat all safeguarding complaints and concerns seriously and without prejudice, and
- Immediately conduct a preliminary risk assessment and take measures to ensure the immediate safety and well-being of all parties involved pending completion of further fact-finding

5.4.2 Support for Victims

The support that Caritas-Spes Ukraine provides to potential victims will be consistent with international ethical principles regarding timely, confidential assistance, oriented towards the needs of the potential victim, taking into account their needs and preferences, while fulfilling the organization's duty to ensure the safety of Caritas-Spes Ukraine staff and partners, as well as those we serve. Caritas-Spes Ukraine will prioritize protecting potential victims from stigmatization, discrimination, retaliation, or other harmful consequences.

Caritas-Spes Ukraine will provide immediate and appropriate support to potential victims in incidents related to safeguarding violations, regardless of whether a formal internal response (e.g., fact-finding) is conducted. Potential support includes:

- Access to medical care
- Access to psychosocial support
- Access to free legal assistance
- Support during fact-finding interviews

In cases where Caritas-Spes Ukraine or persons affected by the fact-finding process (the person who reported the incident, the victim, witnesses, the respondent, etc.) believe that the fact-finding process may pose a threat to them or anyone else, Caritas-Spes Ukraine will take reasonable measures to reduce the identified risks.

5.4.3 Support for the Respondent

Caritas-Spes Ukraine will ensure respect for the well-being of the respondent throughout the investigation process. This includes treating the person with respect, maintaining confidentiality, and providing access to appropriate support. Caritas-Spes Ukraine will adhere to the principle of due process, ensuring an unbiased and transparent response to concerns, timely and appropriate notification of the respondent regarding

¹⁶ CHS Alliance Investigation Guidelines

the allegations against them, and providing them with an opportunity to respond before a decision is made. To further protect their dignity, Caritas-Spes Ukraine will take measures to prevent stigmatization, the spread of rumours, or unfair treatment by colleagues during and after the fact-finding process. Workplace gossip or conduct that undermines this principle may itself be considered a violation. In cases where safety concerns are particularly sensitive, the person may be suspended from work for the duration of the investigation; this measure is intended to protect both the integrity of the process and the rights of all parties involved.

5.4.4 Prohibition of Retaliation

Caritas-Spes strictly prohibits retaliation against any person who, acting in good faith, reports allegations or concerns, expresses reasonable suspicions, or participates in fact-finding related to this Policy or any norms governing the activities of the confederation. Retaliation may include any forms of pressure, intimidation, discreditation, harassment, deterioration of working conditions, restriction of professional opportunities, or other adverse actions against a person who, in good faith, reported an incident or participated in the fact-finding process.

6.0 Confidentiality and Data Protection

6.1 Confidentiality

Caritas-Spes Ukraine recognizes and respects the courage and trust required to report a concern or allegation of misconduct. Caritas-Spes Ukraine is committed to protecting the confidentiality¹⁷ of all parties involved in a report on a safeguarding fact-finding case, including victims, persons who reported it, witnesses, persons possessing information, and respondents.

All staff and partners of Caritas-Spes Ukraine are obligated to handle confidential information responsibly, with respect, and in accordance with the current legislation of Ukraine. Victims themselves may freely share their own information in order to access support or services.

Persons submitting reports should be aware that full confidentiality cannot always be guaranteed. In certain circumstances, it may become necessary to disclose limited information, for example:

- when Caritas-Spes Ukraine is legally or contractually obligated to provide information to donors, authorities, or other third parties
- if the reports relate to potential criminal offences
- in cases where statutory child protection procedures apply, or
- in cases where the fact-finding process requires the transfer of testimony to third parties

In such cases, confidentiality will be protected to the maximum extent possible within the limits of legal or moral obligations.

Informed consent must be obtained from persons interviewed during fact-finding processes. In accordance with the requirements of this Policy, children may only be photographed or interviewed with the written consent of their parents or guardians.

6.2 Data Protection

Caritas-Spes Ukraine is committed to applying the highest standards of data protection when processing personal data. All documents relating to reports and fact-finding

¹⁷ Confidentiality differs from anonymity. It means limiting access to information and its disclosure, i.e., restricting information and details to those who "need to know".

regarding safeguarding incidents will be securely stored and shared only on a "need to know" basis¹⁸.

However, Caritas-Spes Ukraine may share anonymized data and statistics on child protection with governing bodies, donors (if provided for by contract), and relevant institutions for the purposes of donor reporting, trend analysis, organizational learning, improvement of the safeguarding system, and risk management.

7. Prevention

Caritas-Spes Ukraine applies a proactive approach to safeguarding, implementing comprehensive preventive measures aimed at protecting the dignity, safety, and well-being of those we serve. Caritas-Spes Ukraine adheres to the following preventive measures:

Safe recruitment: All potential candidates undergo thorough screening, during which particular attention is paid to an impeccable reputation regarding ethical conduct. Caritas-Spes Ukraine actively participates in the Misconduct Disclosure Scheme (MDS), and therefore all staff and partners are required to sign a Self-Declaration Form¹⁹ regarding any past convictions or disciplinary measures, and safeguarding-related questions are integrated into the reference-checking process, covering a five-year period prior to application.

Acknowledgement of the policy: All staff and partners confirm in writing that they have read, understood, and agree to comply with the Caritas-Spes Ukraine Code of Conduct and safeguarding-related policies²⁰.

Induction training: All staff and partners undergo induction training covering the key safeguarding policies of Caritas-Spes Ukraine, including this Policy, Codes of Conduct, the Anti-Corruption, Anti-Fraud, Anti-Money Laundering, and Counter-Terrorism Financing Policy, and the Procedure for Receiving and Reviewing Feedback and Complaints of RM Caritas-Spes RCC in Ukraine. Annual refresher sessions are organized to reinforce awareness and compliance.

Risk assessment and safe programme planning: Caritas-Spes Ukraine actively promotes safe programme planning and risk management across all its activities in accordance with Caritas Internationalis's safe and dignified programming guidance.

Monitoring and continuous improvement: Safeguarding practices are periodically reviewed to ensure compliance. Action plans are developed and implemented to promote continuous improvement.

8. Partners and Service Providers

All partnership agreements and contracts with service providers²¹ must contain a standard clause:

Standard clause for contracts with partners/service providers

"The Party hereby represents, warrants, and undertakes for the entire term of this Agreement and after its termination:

¹⁸ Access to confidential or sensitive information is limited only to those persons who need this information to perform their specific duties or responsibilities.

¹⁹ Please see Annex VI "Self-Declaration Form".

²⁰ Please refer to Annex V "Acknowledgement Form"

²¹ Including contractors, suppliers, consultants, and sub-partners

- to familiarize itself with the Safeguarding Policy of RM "CARITAS-SPES" RCC in Ukraine (hereinafter — the Policy) and the Staff Code of Conduct and to ensure that all its employees, subcontractors, and volunteers involved in the performance of this Agreement are familiarized with them;
- to comply with the Policy, not to engage in prohibited conduct (including any forms of sexual exploitation and abuse, harassment, discrimination, human trafficking, child labour) and not to permit its commission by its employees, subcontractors, and volunteers;
- to promptly (no later than 24 hours from the moment of discovery), in writing, notify Caritas-Spes Ukraine of any suspicions, allegations, or incidents relating to violations of the Policy connected with the performance of this Agreement;
- to fully cooperate in the fact-finding of such incidents, providing the necessary information and documents in compliance with personal data protection legislation;
- in cases where the Party works with children or vulnerable adults, to conduct a criminal record check of all persons involved and to fulfil the obligations provided for by Resolution of the Cabinet of Ministers of Ukraine No. 658 dated 04.06.2025 and the Law of Ukraine "On Prevention and Combating Domestic Violence";

A breach of this clause constitutes a material breach of the Agreement and grants Caritas-Spes Ukraine the right to unilaterally terminate the Agreement without payment of any compensation, with recovery of damages incurred."

9. Compliance

Full compliance with this policy is mandatory for all staff and partners of Caritas-Spes Ukraine. Failure to comply with the provisions set out in this policy may result in a range of measures and consequences, in particular: verbal warnings, written warnings, mandatory training or counselling, suspension from work, and disciplinary sanctions up to and including dismissal or termination of cooperation with Caritas-Spes Ukraine.

Serious violations, such as sexual violence and exploitation, sexual harassment, sexual or romantic relationships with a child, as well as persistent bullying and harassment, are grounds for immediate dismissal or termination of cooperation.

Knowing facilitation of or assistance to another person in committing acts of exploitation or violence will be treated in the same manner as if the staff member or partner of Caritas-Spes Ukraine had directly committed such a violation.

Questions regarding the interpretation of this policy may be directed to the safeguarding manager.

10. Periodic Review of the Policy

This policy will be reviewed and updated at least every 3 years. However, it may be reviewed earlier if this is deemed necessary based on feedback, new needs, or relevant changes.

Executive Director

of the RELIGIOUS MISSION "CARITAS-SPES"/CARITAS-SPES/

ROMAN CATHOLIC CHURCH IN UKRAINE

Vyacheslav Hrynevych

[signature]

[Official round seal of the Religious

Mission "Caritas-Spes"/CARITAS-SPES/ Roman Catholic Church in Ukraine, Kyiv]

Annex I Standards of Professional Conduct of Caritas-Spes Ukraine on Safeguarding

These standards reflect our commitment to protecting the safety and well-being of all people. They reflect the essence of the professional conduct expected by Caritas-Spes Ukraine, but may not cover all potential situations.

I am committed to protecting the rights of all people, especially children and vulnerable adults

- I treat everyone, especially children and vulnerable adults, with respect.
- I am aware that I hold a privileged position by being associated with Caritas-Spes Ukraine.
- I am aware of unequal power relations (for example, between an adult and a child, or a partner and a programme participant) and I will not abuse my position.

I prioritize the safety and well-being of children and vulnerable adults²²

- I am aware of situations and behaviours that may be perceived as exploitation or abuse (e.g., giving gifts, paying excessive attention, or forming "special" friendships). I will avoid such situations or take additional measures to ensure everyone's safety.
- I will not use physical punishment or threats of physical punishment.
- I will not do things for children that they can do for themselves.
- I will not give children alcohol, cigarettes, or drugs.
- I will not speak or behave in a manner that is inappropriate, exploitative, oppressive, offensive, sexually provocative, humiliating, or culturally inappropriate.
- I will not employ children to perform household or other work that is inappropriate given their age or stage of development, that interferes with their education and rest, or that puts them at significant risk of injury.
- Where possible, I will ensure the presence of another adult when communicating with children.
- I will not invite unaccompanied children to my home or car unless they are in immediate danger.

I prevent any forms of sexual exploitation, abuse, and harassment

- I will not enter into sexual relationships with persons under the age of 18 (regardless of local legislation). I understand that not knowing a person's age is not an excuse.
- I will not enter into any sexual relationships with those who benefit from our work. I will not use my position or power for sexual purposes. Such relationships jeopardize the integrity of our work.
- I will not exchange money, work, goods, assistance, or services for sex, including sexual services or other forms of degrading, humiliating, or exploitative conduct. This includes exchanging assistance belonging to participants in our programme.
- I will ensure that no one is harmed during the implementation of our programmes or activities.
- I will not participate in trafficking in human beings in any form.

I use technology appropriately and responsibly

- I will not use technology (such as computers, mobile phones, cameras, or social media) to exploit or harass other persons.
- I will not view or distribute materials containing elements of exploitation, including materials containing child sexual abuse.

²² These standards of conduct are not intended to interfere with ordinary family relationships.

I act responsibly when working with photographs and videos

- I respect local traditions and restrictions when taking photographs or videos.
- I obtain prior informed consent. This means I obtain permission before taking a photograph or video. I explain how the photo or video will be used. I keep written records of the consent obtained.
- I ensure that photographs and videos portray people in a dignified and respectful manner, not as subordinate or vulnerable. They should be appropriately dressed and not posed in positions that could be perceived as sexually explicit.
- I ensure that images honestly reflect the context and facts. I do not exaggerate the truth to make a story more compelling.
- I ensure that photo data (such as file names, metadata, or text descriptions) do not disclose information about a child that could identify them, such as name or location. I double-check that photos and videos are anonymized before distributing them.

I care about the safety of my colleagues

- I treat all colleagues with respect, dignity, and fairness.
- I help to create and maintain a safe, inclusive, and supportive work environment that prevents any forms of exploitation, abuse, and harassment.
- I am familiar with the organization's child protection policies and procedures and adhere to them.

I report immediately, even if I am merely concerned, suspect something, or am unsure

- I will immediately notify the safeguarding manager if I enter into a personal relationship that could be perceived as inappropriate or exploitative, or if there are unequal power relations (real or perceived). If I am not sure whether my relationship falls into this category, I will discuss the situation with my immediate supervisor and/or the HR department.
- I must immediately report if I have concerns, suspicions, or allegations regarding:
 - ✓ Exploitation, abuse, or sexual harassment by a colleague, whether or not they work for the same organization;
 - ✓ Sexual relationships involving a power imbalance (for example, between a staff member or partner and a programme participant or community member);
 - ✓ Violation of Caritas-Spes Ukraine policies, Codes of Conduct, or these Standards of Professional Conduct.

I understand that I can submit a report through:

- The form on the website (including anonymously)
- In person to the safeguarding manager
- +38 (067) 274-71-15
- Email: safeguarding@caritas-spes.org
- The safeguarding coordinator at the diocesan level

I understand that Caritas-Spes Ukraine applies a zero-tolerance policy towards abuse, exploitation, and harassment

- I understand that Caritas-Spes Ukraine takes all reports seriously, promptly reviews concerns, and responds to them appropriately. Caritas-Spes Ukraine adheres to the "do no harm" principle and prioritizes the rights of the victim while ensuring procedural fairness for all parties.

- I am obligated to fully cooperate with any fact-finding process regarding safeguarding incidents and to maintain full confidentiality regarding allegations and investigations.

Annex II Guidance on Bullying

This guide provides information for supervisors and coordinators who observe or receive reports of workplace bullying. It includes guidance on what is and is not bullying, and how it differs from classic harassment. It also contains information on how to prevent bullying; how to respond to reports; and how to promote respectful behaviour in the workplace. This document concerns the conduct of Caritas-Spes Ukraine staff and partners (including interns and volunteers) towards other staff members.

1. What is bullying?

Bullying — is the mistreatment of one or more persons by one or more perpetrators. To qualify as bullying, the conduct generally must be persistent, repeated, and targeted, taking into account both severity and frequency.

Examples of conduct that may be considered workplace bullying, if it is persistent and repeated and directed against a specific person or persons:

- offensive, humiliating, or aggressive statements or comments
- aggressive and intimidating behaviour
- demeaning or humiliating comments
- jokes
- unfounded criticism or complaints
- deliberately excluding someone from work activities
- withholding information that is vital for effective performance of work
- spreading false information or malicious rumours

Examples of unreasonable management conduct

Certain types of management conduct are unacceptable and may be considered bullying if they are persistent and repeated in relation to one or more employees. Examples:

- disciplining one or more employees or expressing concerns about their work in the presence of others, instead of doing so privately
- aggressive and intimidating behaviour when directing the work of employee(s)
- using demeaning and offensive comments towards employee(s) when their results do not meet expectations
- deliberately assigning employees complex tasks that exceed their capabilities or that they cannot perform without the provision of appropriate resources or support
- unfair and inconsistent treatment of expectations regarding employees' work results

2. How does bullying occur?

Bullying can occur in various ways: in person, via email, text messages, or other social media. In some cases, bullying may continue outside the workplace.

Bullying may be directed at a single employee or a group of employees and may be carried out by one or more employees. It can occur:

- between two colleagues who are not in a subordinate-supervisory relationship
- top-down — from supervisors or managers to employees, or
- from employees towards supervisors or managers

3. What is not bullying?

A single incident of unreasonable conduct is not bullying; however, a single incident can escalate into bullying, so it should not be ignored. Sometimes an employee's conduct may be considered unpleasant and/or disagreeable but not directed against a specific person or group. This type of conduct is not considered bullying, but it may also not align with the values and/or standards of professional conduct of Caritas-Spes Ukraine and needs to be addressed within HR policy.

Examples of reasonable management actions

Reasonable management actions are also not considered bullying. Supervisors, managers, and coordinators are obligated to define work assignments, assess employee performance, and provide feedback on results. Sometimes, in exercising their authority, a supervisor's or coordinator's decision may cause discomfort to an employee. Disagreement with a management decision or resentment towards it does not necessarily mean that the action itself was unreasonable. Reasonable management actions include:

- setting realistic and achievable performance standards and deadlines
- fair and appropriate setting of working hours
- transferring an employee to another department or position for operational reasons
- refusing an employee's promotion, provided a fair and transparent process is followed
- addressing unsatisfactory work results in an honest, fair, and constructive manner
- addressing instances of inadequate conduct in an objective and confidential manner, including such behaviours as:
 - ✓ irregular attendance at work or abuse of the right to leave
 - ✓ failure or refusal to carry out reasonable instructions from a supervisor
 - ✓ using work time to conduct personal affairs outside of lunch or other breaks
- taking disciplinary measures, including suspension from work or dismissal, where appropriate or justified by the circumstances.

Differences of opinion

Differences of opinion and disputes are generally not bullying. People may have disagreements or disputes in the workplace without resorting to repeated, unfounded bullying behaviour. However, if a conflict in the work environment is not resolved, it can escalate into bullying.

What is harassment?

Harassment — is targeted conduct that demeans, threatens, or offends and creates a hostile working environment. It is usually directed against an individual or group of individuals based on their membership in or identification with a particular group (race, ethnicity, gender identity, etc.).

4. How to prevent harassment?

Supervisors can prevent harassment by demonstrating the Codes of Conduct and values of Caritas-Spes Ukraine through their own behaviour, and by shaping an office culture that emphasizes dignified workplace conduct. In addition to demonstrating dignified conduct at all times, here are some examples of prevention strategies:

- Responding to unreasonable conduct as soon as it comes to their attention
- Regularly emphasizing the importance of a safe work environment for all employees
- Informing employees of performance issues as they arise, in a constructive and confidential manner

- Mentoring subordinates who need support in developing effective communication skills
- Ensuring that management actions are clearly communicated and understood
- Promoting and encouraging work-life balance
- Clearly defining and delineating job duties
- Setting realistic performance standards and deadlines

5. The role of supervisors, managers, and coordinators upon receiving a report of harassment incidents

In the case of direct observation of harassment incidents: Supervisors, managers, and coordinators must intervene immediately if they observe harassment within their work teams. This may require the supervisor/manager/coordinator to have a confidential conversation with the relevant employee(s). A verbal warning may also be necessary. The supervisor/manager/coordinator must document their actions. If the harassment is systematic and warnings or other disciplinary measures have already been taken, the supervisor/manager/coordinator must immediately notify the safeguarding manager before taking further disciplinary action.

Upon receiving a report of harassment incidents: In cases where a supervisor/manager/coordinator receives a report or learns of incident(s) from an employee, they must notify the safeguarding manager as soon as possible.

Annex III IASC Definitions and Principles of the Victim/Survivor-Centred Approach

¹²³ Purpose: The Inter-Agency Standing Committee (IASC) strives to apply a comprehensive victim/survivor-centred approach¹²⁴ to sexual exploitation and abuse (SEA) and sexual harassment (SH). This guide provides a general definition of the victim/survivor-centred approach, its core principles, and key actions, and is intended to assist IASC members in adopting and implementing the victim/survivor-centred approach in their formal and informal processes, policies, and procedures related to SEA and SH.

Definition: The victim/survivor-centred approach places the rights, wishes, needs, safety, dignity, and well-being of the victim/survivor at the centre of all prevention and response measures relating to sexual exploitation and abuse (SEA) and sexual harassment (SH).

Principles and Key Actions:

Safety, protection, and well-being: Ensure the safety and protection of the victim/survivor as a top priority, taking into account their family, social, and cultural context. Adhere to the principles of "do no harm" and refrain from any actions that jeopardize the safety, protection, and emotional well-being of the victim/survivor. Assess potential risks to victims/survivors and ensure that all contact, communication, and support provided to the victim/survivor protects their rights, needs, safety, dignity, and emotional well-being, and protects them from stigmatization, discrimination, retaliation, and re-traumatization.

Confidentiality: Confidentiality covers both the identity of those who provided information and the information itself. Victims/survivors have the right to choose to whom they tell their story and to whom they do not; however, they must be informed of the limits of confidentiality, including the existence of mandatory reporting procedures and what they entail. As early as possible, before the victim/survivor shares their personal data and details of the incident, outline what information may be shared, with whom, and for what purpose. Explain any implications for the scope and conduct of a possible investigation should the victim/survivor decide to keep the information confidential. Ensure reliable data protection measures are in place.

Dignity and respect: All measures taken must be based on respect for the dignity, choice, wishes, needs, rights, culture, and values of the victim/survivor, and their informed choice should be considered the top priority. Treat the victim/survivor with courtesy, empathy, and professionalism.

²³ The term "end-to-end" means the full process from beginning to completion. The end-to-end victim/survivor-centred approach, as well as the key principles of such an approach, apply to all policies, procedures, and practices of IASC member organizations, including prevention, response, and accountability measures. In all interactions, the perspectives, rights, needs, and interests of victims must be taken into account.

²⁴ Victim/survivor: this document uses the term "victim/survivor", recognizing that the individual terms "victim" or "survivor" are preferred in certain contexts, particularly for victims/survivors themselves. Although these two terms are often used interchangeably, "victim" is more common in legal and medical systems, while "survivor" is more common in the psychosocial support sectors.

Non-discrimination and inclusiveness: Victims/survivors must receive equal and fair treatment. Be gender-sensitive and inclusive. Do not discriminate on the basis of race, colour, sex, gender identity and sexual orientation, ethnicity, age, language, religion, belief, political or other opinion, national or social origin, disability, property status, birth, or other status. Recognize intersecting discrimination and be aware of your own biases.

Ask, listen, and engage: Ask questions, engage with the victim/survivor, and listen to them without bias or judgment, using a trauma-informed approach. Show empathy in all interactions with the victim/survivor. Do not assign blame or responsibility, but allow the victim/survivor the opportunity to share, if they wish, at their own pace. Consult with victims/survivors and create opportunities and channels for their active participation in decision-making and processes that concern them.

Transparency and information: Provide the victim/survivor with regular and timely information in a language and format that is accessible, so as to enable them to assess and understand the implications, including the benefits and risks of certain actions, and to make an informed choice. Explain to the victim/survivor the rights of the alleged perpetrator(s) to due process as early as possible, so that the victim/survivor can understand how this may affect them.

Informed consent/choice²⁵: Consent is based on a clear awareness and understanding by the victim/survivor of the facts, consequences, and potential implications of certain actions. Actively obtain consent from victims/survivors regarding the possible use of the information they have provided. Try never to disclose information to any party without the informed consent of the victim/survivor. Inform victims/survivors of their right to participate or not participate in the process, and that the IASC organization may decide to take management action without their consent and participation in order to prevent further harm. The victim/survivor may withdraw their consent to participate in the process at any time, which will not affect their right to assistance.

Support and assistance: Provide comprehensive assistance and support to all victims/survivors, regardless of whether they initiate an investigation or any other accountability or dispute resolution procedure, or cooperate with them. At their request, facilitate the accompaniment of victims/survivors during any accountability processes through a specially designated support person or otherwise. In accordance with their wishes, accessible and quality services must be provided, including but not limited to medical, psychological, socio-economic support, and legal services, or referrals to relevant services must be made, for such period as is appropriate and consistent with the policies and standards of the relevant organizations and inter-agency policies and standards, and taking into account their specific circumstances.

Protection of rights: Respect the rights of victims/survivors to obtain redress from perpetrators through formal and informal procedures, depending on the circumstances, including restorative justice, and, where necessary, provide victims/survivors with support in obtaining such redress. Facilitate the filing of paternity and child support claims for victims/survivors, at their request and in cases where this is provided for by law, in cooperation with the relevant state.

Feedback: Collect feedback from victims/survivors regarding ongoing processes and procedures and strive to learn from each specific case. In the event of a violation

²⁵ In cases involving young children, where obtaining their informed consent is not possible, their informed consent may be obtained in a manner consistent with their evolving capacities

of any of the above principles, victims/survivors have the right to file a complaint and/or provide feedback, using, depending on the circumstances, the individual procedures of IASC member organizations or through the UN Ombudsman and Mediation Services and/or the Office of the Victims' Rights Advocate.

Provisions concerning child victims/survivors: Assistance and support to child victims/survivors (persons under 18) must be provided in a manner consistent with the Convention on the Rights of the Child (CRC), in particular the "best interests of the child" principle, in accordance with Article 3 of the CRC. Children have the right to have their best interests assessed and taken into account as a primary consideration in all actions or decisions concerning them. In addition, children must be guaranteed the right to freely express their views on all matters affecting them, with their views given due weight in accordance with the age and maturity of the child, in accordance with Article 12 of the CRC. With regard to children who are too young to understand information about their rights and service options, this information should also be provided to a trusted adult who can help the child participate in decision-making.

Notes on:

Prevention: IASC members must take decisive measures to create an environment free from child sexual exploitation and abuse, in which all people are treated with respect, perpetrators are held accountable, all staff feel comfortable expressing their views, and are confident that allegations of child sexual exploitation and abuse will be handled in accordance with the aforementioned principles.

Community engagement and participation: Conduct awareness-raising and educational, preventive outreach activities to ensure that aid recipients, local populations, and staff are aware of prohibited conduct by humanitarian workers¹, safe working conditions, their rights, reporting mechanisms, and available support services. Create, strengthen, and/or use accessible, reliable, and adapted complaint mechanisms and support services oriented towards victims/survivors.

Accountability: IASC members bear organizational responsibility for ensuring that measures are in place to ensure accountability through conducting investigations, applying disciplinary measures, and facilitating criminal investigations by states where appropriate, as well as for studying cases and revising policies where necessary in accordance with the aforementioned principles.

Annex IV Roles and Responsibilities

The table below sets out the responsibilities of all staff, partners, and representative organizations regarding the implementation of the Caritas-Spes Ukraine Safeguarding Policy.

Role	Responsibilities
All staff and partners	Familiarize yourself with, understand, and apply the safeguarding policy. Be aware of the signs of improper conduct or policy violations. Immediately report concerns or suspicions regarding safeguarding through the channels specified in this policy; do not attempt to investigate on your own. Treat anyone who reports a safeguarding allegation with respect, maintaining confidentiality and showing care. Participate in investigations when asked, and keep all information in strict confidence.
Middle management (coordinators, team leaders, managers)	Set an example of ethical and moral conduct consistent with the standards set out in this policy. Disseminate information about this policy among subordinates and other staff and encourage them to report concerns related to child protection. Treat reports of safeguarding violations confidentially and ensure they are promptly reported through the channels specified in this policy. Ensure that no one suffers adverse consequences for reporting safeguarding concerns or for facilitating an investigation. Take consistent and proportionate disciplinary measures where allegations are confirmed/proven.
Strategic leadership team/senior management team	Demonstrate exemplary ethical and moral conduct consistent with the standards set out in this policy. Provide strategic leadership that fosters a strong safeguarding culture. Ensure that all procedures, practices, plans, and operations comply with and reinforce this policy. Monitor how this policy is applied, and use lessons learned to strengthen strategies for preventing misconduct, including among partners and suppliers.
Executive Director Safeguarding Manager	Ensure compliance with this policy by all staff and partners, especially management.

Sensitive Complaints Review Commission	Ensure sufficient resources are available for the effective implementation of this policy. Exercise oversight and control over disciplinary or corrective measures to ensure their consistency, proportionality, and effective implementation.
HR Department Legal Support Department Risk and Security Management Manager Safeguarding Manager	Ensure that all recruitment processes comply with safe recruitment practices. Include the requirement to comply with the Caritas-Spes Ukraine Safeguarding Policy in all job descriptions (for all staff and partners, paid or unpaid, full-time or part-time, temporary or long-term). Ensure new staff and volunteers (paid or unpaid) undergo induction training on this Safeguarding Policy and sign the Acknowledgement Form for the Policy. Ensure that all consultants familiarize themselves with and sign the Caritas-Spes Ukraine Safeguarding Policy as part of their contract. Require all suppliers and service providers to comply with the Caritas-Spes Ukraine Code of Conduct and the relevant sections of this Safeguarding Policy, including reporting obligations. Ensure that disciplinary or corrective measures are consistent and proportionate to the proven violation.
Safeguarding Manager	Conduct periodic reviews of this policy and ensure that the relevant policies and procedures comply with industry standards. Cooperate with all departments to ensure the effective implementation of and compliance with this policy. Provide continuous training and support so that staff can properly and effectively implement this policy and respond to reports of safeguarding violations. Accept reports of safeguarding violations and oversee investigations of substantiated allegations.
Sensitive Complaints Review Commission	Oversee reports of safeguarding violations and investigations concerning employees, affiliated persons, partners, suppliers, and service providers of Caritas-Spes Ukraine. This includes approving the action plan proposed by the designated person or, if necessary, providing alternative proposals. Review and approve final investigation reports or, if necessary, request additional information.

	Recommend disciplinary measures where appropriate and necessary.
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Annex V Acknowledgement Form

All Caritas staff and partners must read, sign, and comply with the Code of Conduct, the Safeguarding Policy, and its annexes of Caritas-Spes Ukraine. These documents prohibit all forms of abuse, bullying, discrimination, exploitation, harassment, sexual harassment, and romantic relationships with programme participants.

.....
I understand the commitment of Caritas-Spes Ukraine to protecting the rights and dignity of children and vulnerable adults, as set out in the Safeguarding Policy and the Code of Caritas-Spes Ukraine.

I have read the Code of Conduct and the Safeguarding Policy of Caritas-Spes Ukraine in full and I understand:

- What conduct I am prohibited from engaging in;
- What standards of conduct I must adhere to;
- That I am obligated to report any suspicions, allegations, or concerns regarding: abuse or attempted abuse; exploitation; sexual harassment; or relationships involving a real or perceived conflict of interest, including those between staff and partners, programme participants, direct and indirect subordinates, managers, supervisors, or leaders;
- How to report concerns or suspicions while maintaining confidentiality;
- That I am obligated to undergo induction training on the Code of Conduct and Safeguarding Policy of Caritas-Spes Ukraine;
- That if I have any questions, I must contact my supervisor, the HR department, or the safeguarding manager;
- That a violation of the Code of Conduct and Safeguarding Policy of Caritas-Spes Ukraine, including failure to report a violation, may result in disciplinary action, up to and including dismissal.

SIGNATURE OF EMPLOYEE/VOLUNTEER

DATE

Annex VI Self-Declaration Form

In order to comply with the Safeguarding Policy and Code of Conduct of Caritas-Spes Ukraine, this form must be completed and signed by all staff, partners, representatives, and third parties before commencing work. The form is stored in hard copy as well as electronically in the cloud. If you wish to discuss the form or your responses, please contact the HR manager or the safeguarding manager.

Full name:	
Date of birth:	
Citizenship (optional):	
Place of residence:	
Phone number:	
Email address:	
Have you ever been known to any government agency, court, or other competent authority in this country or abroad as a person posing a risk or potential risk to children or vulnerable adults?	YES/NO If yes, provide additional information below
Have you ever been the subject of a police investigation or judicial proceedings in this country or abroad on suspicion of abuse or improper conduct towards minors or vulnerable adults, that is not reflected in your criminal record?	YES/NO If yes, provide additional information below
Have you been the subject of any disciplinary investigation and/or sanctions by any organization due to concerns about your conduct towards children or vulnerable adults?	YES/NO If yes, provide additional information below

Confirmation of statement (tick the box below):

- ☐ I consent to RM "Caritas-Spes Ukraine" processing my personal data specified in this form for the purpose of assessing my compliance with the Safeguarding Policy and Code of Conduct requirements. I am aware of my rights as a subject of personal data under the Law of Ukraine "On Personal Data Protection". The retention period for the form is 5 years from the date of its submission, after which it is destroyed in accordance with established procedure.
- ☐ I agree to notify the organization within 24 hours if an investigation is initiated against me by any authority or organization in connection with concerns about my conduct towards children or vulnerable adults.

☐ I hereby authorize any person, organization, or educational/training institution that I have indicated as a reference in my application to disclose, in good faith and with due confidentiality, any information they may hold regarding my qualifications or suitability for employment.

☐ I release from any liability any employer, individual, or educational institution for providing information about me that is necessary and an integral part of the employment process.

☐ I understand that the information contained in this form, and information provided by third parties, may be shared by the organization with other persons or organizations in cases where this is deemed necessary to protect other children or vulnerable adults.

Signature:	
Full name printed:	
Date:	

Annex VII Incident Report Form

Instructions

This form is used to report incidents related to safeguarding or the Code of Conduct. Caritas-Spes Ukraine is committed to reviewing and responding to all reports. If you cannot complete any section of this form, complete what you can. If there is more than one survivor, complete a separate report for each. If there is an immediate threat to life or urgent assistance is needed, contact local authorities immediately and notify the safeguarding manager.

REPORTED BY:

Does the person submitting the report wish to be identified?

Yes No

If yes, name and contact information of the person who submitted the report

Phone number: indicate city or country code (preferred): _____ (alternative): _____ Email: _____ Organization name: _____

Position: _____

How did the reporter learn about this incident?

VICTIM:

Is the victim a child (under 18) or an adult?

Child _____ Adult _____

Name _____ Surname _____ Nickname _____ Unknown _____

Approximate age _____

Sex _____

Any additional information:

Guardian/carer/relative:

Name _____ Initials _____ Surname _____ Unknown _____

Physical address _____

Phone number (including country and city code) _____

Email _____

Approximate age _____

Sex _____

INCIDENT DETAILS

Describe the incident(s) in as much detail as possible, to the extent known to the person reporting it.

Location of the incident(s):

Address/description of the location: _____ Country _____

Approximate date of the incident(s): Month _____ Day _____ Year _____

Date of report: Month _____ Day _____ Year _____

Please describe the physical and emotional condition of the victim, including any physical injuries or emotional distress.

Was the victim in immediate danger prior to completing this form?

Yes No

Have the relevant authorities and senior management been notified?

Yes No

Please provide any other important information regarding the safety or well-being of the victim.

Limitations or disability:

Does the victim have any physical impairment or disability?

Yes No Don't know

If yes, describe the impairment or disability.

Alleged perpetrator/respondent:

Name _____ Initials _____ Surname _____ Unknown _____

Phone number (including city or country code) _____

Email _____

Approximate age _____

Sex _____

Physical description of the alleged perpetrator:

Physical address _____ Unknown _____

Organization name _____ Position _____

ADDITIONAL INFORMATION:

Are there other persons who possess additional information?

Yes No

If yes, please provide details:

Annex VIII SAFEGUARDING BRIEFING FOR VOLUNTEERS

of RM "CARITAS-SPES" RCC in Ukraine

1. Context and Purpose

Caritas-Spes Ukraine is a humanitarian organization whose activities are based on respect for the dignity of every person, especially the most vulnerable. When implementing programmes, the organization adheres to zero tolerance for violence, exploitation, discrimination, and violations of human rights.

In view of this, all volunteers working with Caritas-Spes Ukraine are required to comply with safeguarding standards, particularly during interactions with beneficiaries, staff, and other programme participants.

The purpose of this briefing is to:

- Introduce the basic principles and policies of safeguarding.
- Explain the standards of conduct expected by Caritas-Spes Ukraine.
- Confirm agreement to comply with these principles.

2. Basic Principles of Safeguarding

- Dignity and equality: the dignity of every person is the core value; every person has the right to safety, respect, and non-discrimination.
- Zero tolerance for any forms of violence, exploitation, harassment, discrimination, or abuse.
- Protection of the vulnerable: particular attention is paid to children, persons with disabilities, the elderly, those who have experienced traumatic events, and other vulnerable categories.
- Prevention: it is important to prevent risks of violence or abuse, not merely to respond to them.
- Responsibility of every volunteer for creating a safe environment.
- Transparency and accountability: everyone involved must know how to act in the event of an incident.

3. Documents the Volunteer Must Familiarize Themselves With

Before starting cooperation, the volunteer receives and familiarizes themselves with the following policies:

- Ethical Code and Staff Code of Conduct
- STANDARDS OF CONDUCT
- Anti-Corruption, Anti-Fraud, Anti-Money Laundering, and Counter-Terrorism Financing Policy
- Policy on the Protection of Children and Vulnerable Adults — PROTECTION FROM ABUSE AND EXPLOITATION "Caritas-Spes"
- Anti-Harassment and Anti-Discrimination Policy
- PROCEDURE for receiving and reviewing feedback and complaints
- Other relevant internal documents governing ethical conduct

These documents are explained in the induction briefing or provided in written/electronic form.

4. Unacceptable Conduct

Caritas-Spes Ukraine categorically prohibits:

- The use of physical force or psychological pressure.
- Any forms and types of exploitation and harassment, including sexual.
- Violation of the confidentiality of personal information.
- Discriminatory, humiliating, or offensive statements or actions.
- Coercing a service recipient into providing reciprocal services not part of their role in the programme (carrying, cleaning, repairing, advertising, etc.).
- Demanding funds from beneficiaries for services provided.
- Coercing the provision of personal information (contacts, photos, etc.).

5. Responsibilities of the Volunteer

- Familiarize yourself with all policies of Caritas-Spes Ukraine.
- Report any suspicions or incidents of safeguarding policy violations.
- Work ethically, with respect for the dignity of every person.
- Disseminate information among other volunteers regarding the code of ethics, prohibited and expected conduct, and ethical communication standards.
- Do not engage in prohibited conduct in accordance with this document and other internal policies of the organization.

6. Mechanisms for Submitting Complaints/Reports

Information about possible violations can be sent through the following channels:

- Safeguarding contact person (Safeguarding Manager) Tetiana Barabanova
- Email: safeguarding@caritas-spes.org
- Helpline: +38 (067) 274-71-15
- Form on the website (including anonymously):
<https://caritas-spes.org/ua/page/who-we-are/sejvgarding>

All reports are handled confidentially and in accordance with the "Do No Harm" principle.

7. Practical Case Example

Situation: a volunteer responsible for distributing humanitarian assistance requests the beneficiary's personal contact information during distribution.

Comment: such conduct is a violation of ethical standards. Any actions that could put a person in a vulnerable position or cause discomfort are unacceptable and must be stopped immediately and reported.

8. ACKNOWLEDGEMENT AND CONSENT CONFIRMATION

I, the volunteer signed below, confirm that:

- I have familiarized myself with the safeguarding briefing provided by Caritas-Spes Ukraine.

- I have familiarized myself with the relevant policies and undertake to comply with them.
- I am aware of my responsibility for ensuring a safe environment when performing volunteer work.
- I am ready to cooperate with representatives of Caritas-Spes in the event of questions or incidents.

Volunteer's full name: _____

Place of work: _____

Area of work: _____

Signature: _____

Date: _____

Annex IX SAFEGUARDING BRIEFING FOR CONTRACTORS

of RM "CARITAS-SPES" RCC in Ukraine

1. Context and Purpose

Caritas-Spes Ukraine is a humanitarian organization whose activities are based on respect for the dignity of every person, especially the most vulnerable. When implementing programmes, the organization adheres to zero tolerance for violence, exploitation, discrimination, and violations of human rights.

In view of this, all partners, service providers, and contractors working with Caritas-Spes Ukraine are required to comply with safeguarding standards, particularly during interactions with beneficiaries, staff, and other programme participants.

The purpose of this briefing is to:

- Introduce the basic principles and policies of safeguarding.
- Explain the standards of conduct expected by Caritas-Spes Ukraine.
- Confirm agreement to comply with these principles.

2. Basic Principles of Safeguarding

- Dignity and equality: the dignity of every person is the core value; every person has the right to safety, respect, and non-discrimination.
- Zero tolerance for any forms of violence, exploitation, harassment, discrimination, or abuse.
- Protection of the vulnerable: particular attention is paid to children, persons with disabilities, the elderly, those who have experienced traumatic events, and other vulnerable categories.
- Prevention: it is important to prevent risks of violence or abuse, not merely to respond to them.
- Responsibility of every partner and contractor for creating a safe environment.
- Transparency and accountability: everyone involved must know how to act in the event of an incident.

3. Documents the Contractor Must Familiarize Themselves With

Before starting cooperation, the contractor receives and familiarizes themselves with the following policies:

- Ethical Code and Staff Code of Conduct
- STANDARDS OF CONDUCT
- Anti-Corruption, Anti-Fraud, Anti-Money Laundering, and Counter-Terrorism Financing Policy
- Policy on the Protection of Children and Vulnerable Adults — PROTECTION FROM ABUSE AND EXPLOITATION "Caritas-Spes"
- Anti-Harassment and Anti-Discrimination Policy
- PROCEDURE for receiving and reviewing feedback and complaints
- Other relevant internal documents governing ethical conduct

These documents are explained in the induction briefing or provided in written/electronic form.

4. Unacceptable Conduct

Caritas-Spes Ukraine categorically prohibits:

- The use of physical force or psychological pressure.
- Any forms and types of exploitation and harassment, including sexual.
- Violation of the confidentiality of personal information.

- Discriminatory, humiliating, or offensive statements or actions.
- Coercing a service recipient into providing reciprocal services not part of their role in the programme (carrying, cleaning, repairing, advertising, etc.).
- Demanding funds from beneficiaries for services provided.
- Coercing the provision of personal information (contacts, photos, etc.).

5. Responsibilities of the Contractor

- Familiarize yourself with all policies of Caritas-Spes Ukraine.
- Ensure that all staff of your organization involved comply with the specified standards.
- Report any suspicions or incidents of safeguarding policy violations.
- Work ethically, with respect for the dignity of every person.
- Do not involve in the performance of work any persons who have not undergone familiarization with these standards and/or who present reputational risks.

6. Mechanisms for Submitting Complaints/Reports

Information about possible violations can be sent through the following channels:

- Safeguarding contact person (Safeguarding Manager) Tetiana Barabanova
- Email: safeguarding@caritas-spes.org
- Helpline: +38 (067) 274-71-15
- Form on the website (including anonymously):
<https://caritas-spes.org/ua/page/who-we-are/sejvgarding>

All reports are handled confidentially and in accordance with the "Do No Harm" principle.

7. Practical Case Example

Situation: a driver providing transportation services asks a passenger for their personal contact information during a trip.

Comment: such conduct is a violation of ethical standards. Any actions that could put a person in a vulnerable position or cause discomfort are unacceptable and must be stopped immediately and reported.

8. ACKNOWLEDGEMENT AND CONSENT CONFIRMATION

I, the representative of the organization signed below, confirm that:

- I have familiarized myself with the safeguarding briefing provided by Caritas-Spes Ukraine.
- I have familiarized myself with the relevant policies and undertake to comply with them.
- I am aware of my responsibility for ensuring a safe environment when providing services.
- I am ready to cooperate with representatives of Caritas-Spes in the event of questions or incidents.

Full name of the contractor's representative: _____

Name of organization/company: _____

Position: _____

Signature: _____

Date: _____