

APPROVED
by Minutes No. 22
of General Meeting
of CHARITABLE ORGANIZATION
“CHARITY FOUNDATION “EAST-SOS”
of December 16, 2024
Executive Director
_____ Yuliia KRASILNYKOVA

REGULATIONS
ON COUNTERING SEXUAL EXPLOITATION AND ABUSE
OF CHARITABLE ORGANIZATION
“CHARITY FOUNDATION
“EAST-SOS”

Kyiv, 2024

1. Purpose and Scope

1.1. The Charitable Organization “Charity Foundation “East-SOS” (hereinafter referred to as the Organization) is committed to upholding the dignity and rights of all persons it provides assistance to, preventing actions that may cause harm, and taking prompt, decisive, and responsible measures in response to incidents of exploitation or abuse.

1.2. The Organization adheres to a zero-tolerance policy towards exploitation or abuse of vulnerable population groups. Ensuring the safety of these groups is the responsibility of every staff member and volunteer, regardless of their employment status.

1.3. These Regulations on Countering Sexual Exploitation and Abuse (hereinafter – the Regulation) are laid down in the Organization's Code of Conduct and shall apply to all employees, volunteers, engaged specialists, members of the Organization's management bodies, and other persons acting on behalf of the Organization, as well as to beneficiaries, donors, partners, and any other persons who interact with the Organization in any way. Compliance with the principles and standards of the Code of Ethics is mandatory for all the aforementioned persons. Adherence to the principles and standards of the Code of Conduct shall be mandatory for all the aforementioned persons.

1.4. All employees, volunteers, engaged specialists, members of the Organization's management bodies, and other persons acting on behalf of the Organization, as well as to beneficiaries, donors, partners, and any other persons who interact with the Organization in any way, shall be obliged to report any breaches of law, regulations, or any actions or conduct that may adversely affect the Organization's mission, objectives, reputation, or activities.

2. Definitions

Vulnerable Population Groups are persons who require special care, support, or protection due to age, disability, migration status, citizenship, or risk of abuse or neglect. These include persons affected by war, forced displacement, psychological trauma, extreme economic hardship, or are members of national minorities.

Sexual Exploitation refers to any attempt to abuse a vulnerability, power, or trust for sexual purposes, including obtaining financial, social, or political benefit from the sexual exploitation of another person.

Sexual Abuse refers to any threat or action of a sexual nature carried out through the use of force, coercion, or in circumstances of unequal power relations.

Gender-based violence (GBV) means any harmful act perpetrated against a person based on socially ascribed gender roles or self-identified gender identity. GBV includes physical, sexual, or psychological violence, threats, coercion, and deprivation of liberty.

Sexual harassment refers to any unwelcome conduct of a sexual nature, which may be expressed through verbal, non-verbal, or physical actions that create an intimidating, hostile, or offensive work environment. This also refers to unwelcome sexual advances, requests for sexual favors, and other similar actions interfering with work performance or negatively affecting a person's well-being.

3. Prohibited Conduct and Relationships

3.1. Vulnerable Population Groups

- The Organization adheres to a zero-tolerance policy toward any forms of (GBV) or sexual exploitation against vulnerable population groups, regardless of their consent.

3.2. Minors

- Any sexual activity with persons under the age of 18 is strictly prohibited, regardless of the age of majority or consent under local law. Ignorance of a person's age does not constitute a defence.

3.3. Relationships between Humanitarian Aid Providers and Beneficiaries

- Intimate or sexual relationships between staff members, engaged professionals, or volunteers and beneficiaries are strictly prohibited.

4. Procedures

4.1. Incident Reporting

- Employees, volunteers, engaged specialists, members of the Organization's management bodies, and other persons must immediately report incidents of GBV or sexual exploitation to the Organization's Ethics Committee via email to **compliance@east-sos.org** or send a report via the **Google Form** available on the Organization's internal website (portal).

4.2. Investigation

1. For the duration of the investigation, the subject of the investigation may be temporarily suspended from their duties.
2. The internal investigation shall be conducted confidentially. Personal data shall be kept in a secure repository and be accessible solely to the Organization's Ethics Committee.

3. The investigation findings shall be examined by the Head of the Organization to determine appropriate disciplinary measures.

4.3. Protection of Survivors

1. A survivor-centered approach prioritizes the best interests of the affected person, ensuring confidentiality and non-discrimination.
2. Information about the incident shall be shared only upon obtaining the informed consent of the survivor.
3. All persons interacting with survivors on behalf of the Organization shall strictly maintain confidentiality and ensure their safety.
4. In cases where formal reporting may pose a threat to a survivor, appropriate measures shall be taken to ensure the person's safety.
5. For minors, their best interests shall be taken into account, and family members or guardians shall be engaged, where appropriate.
6. Investigations shall be conducted regardless of the willingness or ability of those involved in the incident to provide testimony.

5. Prevention of Sexual Exploitation, Abuse, and Harassment

1. The Organization shall ensure reporting channels with whistleblower protection, confidentiality, and non-retaliation.
2. Neutral third-party options for filing complaints shall be available to ensure impartiality.
3. External audits shall be conducted to assess preventive measures.
4. Policies and practices shall integrate the principles of gender equality and social inclusion.
5. Awareness campaigns shall be aimed at both staff and beneficiaries.
6. Partnership with external stakeholders improves coordination and the exchange of best practices.

7. Regular staff rotation shall reduce the risks associated with long-term contact with vulnerable population groups.
8. The Organization shall adhere to local and international legislation pertaining to SEA.

6. Responsibility

6.1. Project Managers/Department Coordinators:

- Shall be responsible for conducting training on countering sexual exploitation and abuse.

6.2. Ethics Committee

- Shall ensure handling of complaints and fair conduct of investigation.
- Shall guarantee investigations are thorough and are finalized within appropriate timeframes.

6.3. Organization's Management

- Shall be responsible for upholding the zero-tolerance approach to sexual exploitation and abuse (SEA) and for overseeing reporting and corrective measures.
- Shall ensures SEA-related training and awareness-raising are conducted.
- Shall appoints a designated PSEA focal point through a transparent selection process.
- Shall guarantee that the focal point is appropriately trained to handle reports and coordinate responses.

7. Policy Review and Update

This policy shall be reviewed and updated annually to ensure alignment with current best practices and legislative requirements.