



Approved by

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Source of Revival
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**MECHANISM FOR ADDRESSING SEXUAL EXPLOITATION
AND ABUSE
CHARITY FOUNDATION SOURCE OF REVIVAL
(CFSR)**

Kharkiv – 2026

1. Purpose and Principles of the Organization

Charity foundation source of revival (CFSR) recognizes that effective prevention and response to sexual exploitation and abuse begins with the implementation of clear organizational policies and the development of an internal culture that firmly condemns and does not tolerate any form of such behavior.

CFSR has developed a set of training modules and internal sessions aimed at preventing, timely identifying, and effectively responding to cases of sexual exploitation and abuse.

To implement these principles, the Foundation has adopted several key documents and procedures, including:

- the Policy on Protection from Sexual Exploitation and Abuse (PSEA);
- the Code of Ethics and Business Conduct;
- Policies on Human Resource Management, Remuneration, and Career Development,

which affirm the organization's commitment to maintaining a respectful, safe, and ethical environment for all individuals involved in its activities.

Familiarization with and signing of the Code of Ethics and Business Conduct is a mandatory prerequisite for initiating any form of cooperation with CFSR.

2. Mechanism for Prevention and Identification

2.1. Prevention Measures and Risk Detection

The Foundation, in cooperation with international and Ukrainian organizations, operates in various cultural contexts and fully supports the principles of freedom of speech, and the protection of victims of sexual exploitation and abuse. Therefore, the following preventive mechanisms have been developed:

- mandatory familiarization with and signing of the Code of Ethics and Business Conduct by all employees, volunteers, consultants, contractors, service providers, and other individuals involved in the activities of the Foundation, in order to clearly define unacceptable behavior, including sexual exploitation and abuse;

- a self-declaration that must be submitted by all candidates and personnel – including volunteers, consultants, contractors, etc. – in accordance with Annex 1 to the Policy on Human Resource Management, Remuneration, and Career Development, confirming the absence of any record of SEA, corruption, fraud, or violations of ethical conduct;
- informing beneficiaries about the available protection mechanisms, in particular through the Complaints and Response Mechanism (CRM), which fosters transparency, engagement, and open dialogue between Foundation staff and beneficiaries;
- conducting trainings and awareness-raising sessions aimed at building the capacity of staff, especially those working with children or vulnerable populations;
- continuous risk identification and regular assessments throughout project cycles;
- assessment of partner organizations for proper verification of their record of compliance with ethical standards and commitments.

2.2. Prohibited Forms of Conduct

- Any direct or indirect involvement in sexual exploitation or abuse, as defined in the PSEA Policy and the Code of Ethics and Business Conduct, is strictly prohibited.
- No individual subject to the PSEA Policy shall use their professional position to exert pressure, manipulate, or obtain sexual services.

3. Actions in Cases of Sexual Exploitation and Abuse

3.1. If Sexual Exploitation or Abuse Occurs within an Employment Relationship

- If a CFSR staff member considers themselves to be a victim or witness of sexual exploitation or abuse (as defined in Section 4 of the PSEA Policy), and the situation is not overly serious, they may attempt to address the issue directly with the person responsible, requesting that the inappropriate behavior cease;

- if the behavior persists or direct communication is not possible, the staff member is required to report the incident in accordance with Section 6.2.1 of the PSEA Policy;
- the report should ideally include the date, time, circumstances of the incident, and, if possible, the names of any witnesses;
- the report must be addressed directly to the Director of CFSR, who is responsible for reviewing such incidents. If necessary, the Director will take appropriate action and initiate an internal investigation.

3.2. If Sexual Exploitation or Abuse Is Committed Against a Beneficiary

- If a person who has signed the PSEA Policy becomes aware of sexual exploitation or abuse against beneficiaries, they are obligated to immediately inform the designated coordinator, the Director of CFSR, and/or send an email to: info@cfsrua.com.
- It is recommended to provide the date, time, factual details, and any potential witnesses.
- All such cases must be reported to the Director of CFSR, who is responsible for reviewing the incident and taking appropriate measures.

3.3. If Sexual Exploitation or Abuse Is Committed Against a Representative of a Partner Organization

- If staff of CFSR or other organizations specified in Section 6.3 of the PSEA Policy witness sexual exploitation or abuse committed by any individual, they are required to promptly report the incident to the responsible person, the supervisor, or via email to: info@cfsrua.com.
- It is important to provide the date, time, incident details, and any witnesses.
- The information must be submitted to the Director of CFSR, who will ensure appropriate response and, if necessary, organize an investigation.

4. Mandatory Reporting for CFSR Staff

- CFSR responds promptly to any cases of sexual exploitation and abuse. To ensure effective response, a designated coordinator has been appointed. Reports of violations can be submitted via email to: info@cfsrua.com.

- CFSR staff members who become witnesses to or victims of sexual exploitation or abuse are obligated to report the incident to their immediate supervisor and/or the designated contact person, and must also send a report to: info@cfsrua.com.
- If any facts, statements, or suspicions of sexual exploitation or abuse become known during the course of their professional duties, staff are required to report them to their immediate supervisor and/or the Director of CFSR. The information must also be sent to: info@cfsrua.com. Such reports are investigated in accordance with Section 5.3 of the PSEA Policy.
- If reporting to the immediate supervisor is inappropriate, staff should contact the Director of CFSR directly. The report must also be sent to: info@cfsrua.com.
- The Foundation guarantees that no employee will suffer harm or retaliation for reporting a violation in good faith and based on reasonable grounds.
- In cases of misuse of the complaints mechanism, appropriate disciplinary measures may be applied.
- All signed self-declarations, records, reports, investigation materials, findings, and confirmations of familiarization and signing of the Code of Ethics and Business Conduct are stored in the personal digital files of the relevant individuals. For this purpose, the Foundation uses secure cloud storage with restricted access, ensuring the confidentiality, integrity, and protection of data related to PSEA and other sensitive information.

5. Reporting Mechanisms for Stakeholders

- The Foundation is committed to supporting individuals who have become victims or witnesses of violations of the Policy on Protection from Sexual Exploitation and Abuse (PSEA). To this end, all stakeholders, as defined in the Policy, are provided with the opportunity to submit reports.
- Any stakeholder who is a witness to or victim of sexual exploitation or abuse has the right to report the incident through the Complaints and Response Mechanism (CRM).

- The Foundation guarantees that no individual will suffer any negative consequences as a result of submitting a report, provided it was made without malicious intent and based on reasonable suspicion.

6. Response and Investigation Procedures

6.1. Investigations Following Reports from CFSR Staff

1. In the event of suspected sexual exploitation or abuse, CFSR staff are required to report the matter to the Director or the person responsible for human resources, and also to send an email to: info@cfsrua.com – in accordance with Section 6.2.1 of the PSEA Policy.

2. Upon receiving a report via email, a response will be provided, which may include:

- a description of the next steps to follow in case of suspected sexual exploitation or abuse (SEA);
- a request for additional information or clarification, if necessary.

3. The complaint will be reviewed either at the CFSR level or within relevant international partner structures (e.g., a UN agency), depending on the gravity of the situation. The initial assessment is conducted by the Director of CFSR.

4. CFSR staff are required to:

- cooperate with individuals conducting the investigation;
- retain all documents and information related to the suspicion;
- ensure the confidentiality of all data.

6.2. Investigations Following Reports from Stakeholders

1. Stakeholders may report suspected cases of sexual exploitation or abuse through the Complaints and Response Mechanism (CRM).

2. Upon receipt of such a report, a response will be provided that:

- outlines the procedure for next steps;
- includes, if necessary, a request for clarification of the circumstances or additional information.

3. CFSR staff are required to:

- cooperate with any investigation initiated based on the report;

- retain any documents that may be relevant to the case;
- maintain confidentiality regarding all aspects of the case.

4. The Director of CFSR is responsible for conducting the investigation and making decisions based on the outcome of the report.

7. Sanctions for Sexual Exploitation and Abuse

7.1. Disciplinary Sanctions

Violations of the Policy on Protection from Sexual Exploitation and Abuse (PSEA), which also constitute breaches of the Foundation's Code of Ethics and Business Conduct, may result in disciplinary action — ranging from a written warning to termination of a civil contract or an agreement with a sole proprietor (FOP), without notice and without compensation, in cases of serious violations.

7.2. Other Sanctions

In the event of a violation of the PSEA Policy by any party or involved individual, the Foundation reserves the right to apply all contractual measures available, including termination of contractual relations.

7.3. Notification of Competent Authorities

Depending on the nature and gravity of the facts established, the Foundation may report cases of sexual exploitation and abuse to competent authorities, including the prosecutor's office.

8. Protection of Survivors

The Foundation is committed to ensuring an appropriate level of support and protection for individuals who have experienced sexual exploitation or abuse. With the consent of the affected person, the following measures are taken:

- maintaining full confidentiality in the handling of reports, in accordance with the PSEA Policy;
- promptly initiating the investigation of facts presented in the reports;
- providing individualized support to survivors, in line with the PSEA Policy;
- informing the survivor about actions taken in response to the report;

- adapting the PSEA Policy to enhance its understanding and compliance among Foundation staff.

The Foundation also undertakes to take all possible measures to prevent re-traumatization, secondary victimization, or discrimination against survivors.