



Approved by

Director of Charity Foundation
Source of Revival
Serhii Zhuk
January 21, 2026

**POLICY ON PROTECTION FROM SEXUAL EXPLOITATION
AND ABUSE (PSEA)
CHARITY FOUNDATION SOURCE OF REVIVAL
(CFSR)**

Kharkiv – 2026

CONTENTS

1. Introduction	3
2. Definitions	4
3. Purpose, Scope and Target Groups	5
4. Key Principles and Rules of Conduct	7
5. Roles and Responsibilities	9
6. Reporting Procedures	12
7. Monitoring and Evaluation	13
Annex 1: Confidential Report on an Incident of Sexual Exploitation and Abuse (SEA)	15
Appendix 2: Referral Form	17

1. Introduction

Charity Foundation Source of Revival (hereinafter – the Foundation) recognizes respect for human dignity and the protection of the rights of vulnerable individuals as one of the key principles of its activities, as outlined in its Charter.

Sexual exploitation and abuse of individuals who receive assistance or support from the Foundation represent some of the most serious violations of humanitarian principles and pose a threat to the Foundation's ability to fulfill its mission. Despite efforts made by the humanitarian sector, cases of sexual exploitation and abuse still occur, and many remain unreported due to fear of retaliation or negative consequences. Therefore, the Foundation considers it essential to take systematic measures to prevent such violations and to ensure an adequate response when they are identified.

This Policy applies not only to beneficiaries but also to employees, volunteers, consultants, contractors, partners, and all individuals involved in the Foundation's activities.

This Policy focuses on issues of sexual exploitation and abuse by the Foundation's personnel.

It may also serve as a reference for partner organizations that are planning to introduce or improve their own approaches to preventing sexual exploitation and abuse.

The Policy establishes provisions prohibiting all forms of sexual exploitation and abuse of individuals who seek or receive assistance from the Foundation. In particular, the exchange of money, labor, goods, or services for sexual acts, sexual favors, or other forms of degrading or exploitative behavior is strictly prohibited. This prohibition also applies to any interaction with sex industry workers.

The Foundation adheres to international standards of zero tolerance for sexual exploitation and abuse and is guided by the provisions of the United Nations Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13). The Foundation also takes into account Resolution 3 adopted by the 32nd International Conference of the Red Cross and Red Crescent in 2015, which condemns sexual and gender-based violence and calls on organizations to implement zero-tolerance policies and apply sanctions for such violations.

2. Definitions

For the purposes of this Policy, the following terms are used with the meanings set out below:

- ***Affected persons*** – individuals who seek assistance from or receive protection and support from the Foundation. This category may include any individuals in the country or local community who interact with the Foundation.

- ***Community-Based Complaints Mechanisms (CBCMs)*** – reliable channels through which members of affected communities can safely submit complaints and seek assistance. These mechanisms are based on engagement with communities, where individuals can – and are encouraged to – confidentially report complaints, including incidents of SEA. Such reports are referred to the appropriate bodies for response.

- ***Foundation personnel*** – any individual who performs work for or on behalf of the Foundation, including specialists engaged under civil-law contracts or contracts with individual entrepreneurs, seconded staff, persons providing services on behalf of the Foundation, volunteers, interns, and consultants.

- ***Internal rules of the Foundation*** – job descriptions, including the Code of Ethics and Business Conduct, as well as other applicable rules, regulations, and policies of the Foundation.

- ***Prevention of Sexual Exploitation and Abuse (PSEA)*** – a set of policies, rules, and actions aimed at preventing the involvement of Foundation personnel in any form of sexual exploitation or abuse, as well as ensuring an appropriate response when such cases are identified.

- ***Retaliation*** – any direct or indirect harmful act that is threatened, promised, or carried out against a person who has been a victim or who, in good faith, reports a suspicion of wrongdoing (including SEA), or who participates in an authorized audit or investigation. Retaliation may include denial of assistance, unfair distribution of resources, biased administrative actions (such as unjustified negative evaluations, changes in job responsibilities, or the creation of a hostile environment), as well as verbal harassment or abuse.

- ***Sexual violence*** – any actual physical or psychological act of a sexual nature committed under threat, coercion, or unequal circumstances against affected persons.
- ***Sexual exploitation*** – includes, but is not limited to, the following acts:
 - sexual relations with persons under 18 years of age. A mistaken belief regarding age is not a valid defense. Foundation personnel are prohibited from engaging in sexual relations with persons under 18, even in countries where the age of consent is lower;
 - exchange of money, employment, goods, or services for sex or other sexual acts;
 - sexual relations with sex workers, even where such activities are legal in a given country;
 - inducing a child or an adult to engage in sexual acts with other persons;
 - coercion, threats, or denial of services or assistance in response to refusal to provide sexual services.
- ***Sexual exploitation and abuse (SEA)*** – a term used in this Policy to collectively refer to the acts described above.
- ***Sexual harassment*** – unwanted sexual conduct, requests for sexual favors, verbal expressions, physical actions, gestures, or any other behavior of a sexual nature that may offend or humiliate another person in the workplace. This may consist of a single incident or repeated conduct.
- ***Third-party personnel*** – any individual employed by another organization and engaged in the Foundation’s activities under a service agreement between the Foundation and a service provider, who is not a direct employee of the Foundation.
- ***Whistleblower*** – a person who reports, on the basis of reasonable suspicion, a possible violation of the Foundation’s internal rules related to wrongdoing.

3. Purpose, Scope and Target Groups

3.1. Purpose

a) The purpose of this Policy is not only to prevent sexual exploitation and abuse by the Foundation’s personnel but also to ensure an appropriate response when such

incidents are identified. This includes caring for the well-being of affected individuals, ensuring accountability, and fostering ethical engagement with communities. An essential component of this Policy is the fair treatment of persons who are reasonably suspected of violations, in accordance with the Foundation's internal rules and policies.

b) This Policy and its procedures strengthen existing systems for internal reporting, investigation, and follow-up actions regarding possible breaches of the Code of Ethics and Business Conduct and job responsibilities related to SEA. The relevant steps for handling SEA cases are explained below in Sections 5 "Roles and Responsibilities" and 6 "Reporting Procedures." The Action Plan supporting the implementation of this Policy is aimed at further addressing awareness-raising and staff training needs, thereby enhancing capacity to address cases in accordance with international standards.

c) This Policy reinforces the accountability framework aimed at preventing sexual exploitation and abuse both within the Foundation's operations and among engaged third parties. It establishes conditions under which anyone – an employee or another person who witnesses or suspects SEA – can safely report an incident and be protected from any form of retaliation.

d) Engagement with local communities, support for accessible complaint mechanisms, and assistance to affected persons are key elements of this Policy, its procedures, and the Action Plan. The approaches set out in this document are aligned with the Foundation's internal guiding principles and are also based on the provisions of the United Nations Secretary-General's Bulletin on Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13), particularly regarding reporting procedures and support for vulnerable individuals. In developing and implementing this Policy, the Foundation also takes into account the best practices of Ukrainian and international humanitarian organizations.

3.2. Scope

a) This Policy applies to all personnel of the Foundation, including employees, volunteers, consultants, contractors, and other individuals engaged in the Foundation's activities.

b) All agreements entered into by the Foundation, including employment contracts, civil-law contracts, contracts for the supply of goods or provision of services, and similar arrangements, must include provisions on compliance with the Policy on Protection from Sexual Exploitation and Abuse (PSEA). The same requirement applies to grant agreements with implementing partners.

c) Complaints concerning the conduct of personnel, volunteers or other engaged individuals shall be handled in accordance with Section 6.3.1 of this Policy.

d) This Policy does not apply to cases of sexual harassment between Foundation employees. Such situations are governed separately in accordance with the provisions of the Code of Ethics and Business Conduct.

e) All employees, volunteers, consultants, contractors, service providers, and other individuals involved in the Foundation's activities are required to familiarize themselves with the Foundation's Code of Ethics and Business Conduct and sign the respective acknowledgment form (see Appendix 1 to the "Code of Ethics and Business Conduct of the Charity Foundation Source of Revival") as a mandatory condition for the commencement of cooperation.

3.3. Target Groups

This Policy is intended to protect the following categories of individuals:

Beneficiaries – persons who seek or receive support from the Foundation;

Foundation personnel – permanent, non-permanent, temporary employees, consultants, and interns;

Volunteers and other engaged individuals, including contractors, service providers, and experts;

Partner organizations and their personnel involved in joint projects with the Foundation;

Any other individuals who interact with the Foundation in the course of its activities.

4. Key Principles and Rules of Conduct

4.1. Zero-Tolerance Policy

The Foundation adheres to a policy of absolute zero tolerance toward sexual exploitation and abuse. This means that any person found guilty of such actions must be held accountable.

4.2. Survivor-Centered Approach

The Foundation applies an approach that places the needs of vulnerable persons at the center of all actions. The core principles of this approach are:

- a) *Do No Harm* – no action should worsen the situation of the affected person.
- b) *Respect* – all decisions and actions must be guided by respect for the individual's choices, rights, dignity, and needs.
- c) *Safety* – the protection and safety of the affected person are an unconditional priority.
- d) *Confidentiality* – information about the affected person, as well as any data that could identify them, must not be disclosed. All cases must be handled with the highest level of confidentiality.
- e) *Non-discrimination* – all persons who require assistance in connection with an SEA incident are entitled to equal and dignified treatment.
- f) *Child Protection* – children who have been affected require special attention and support. Child protection issues must be addressed with the involvement of qualified specialists.

4.3. Principles of Investigation

Investigations into cases of sexual exploitation and abuse must be impartial, fair, and conducted with respect for the rights of all persons involved.

4.4. Community Engagement

The Foundation follows an approach based on community engagement and accountability, placing the interests of local communities at the center of its activities.

4.5. Prohibited Conduct

In accordance with the Code of Ethics and Business Conduct, Foundation staff are required to:

- a) Refrain from any form of sexual exploitation and abuse.
- b) Not engage in sexual relations:

- with persons under the age of 18, regardless of the age of consent (lack of knowledge or mistaken belief about age does not constitute a justification);
- with adults who seek or receive assistance from the Foundation;
- in any form involving abuse of power, inequality, or coercion, regardless of whether physical contact is involved.

c) Not offer or exchange money, work, goods, or services for sexual services, sexual favors, or other forms of exploitative or degrading behavior.

d) It is prohibited to create, store, distribute, or view pornographic materials in the workplace or through the use of the Foundation's equipment, including email and internet resources.

4.6. Protection of Whistleblowers

The Foundation adheres to a policy of zero tolerance toward any form of pressure or retaliation against persons who report, in good faith, reasonable suspicions of violations of internal rules or who participate in audit or investigation procedures.

4.7. Principle of Good-Faith Reporting

Any person reporting a suspected offense must act in good faith and have reasonable grounds to believe that the information provided may indicate a violation of the Foundation's internal rules.

5. Roles and Responsibilities

5.1. Leadership Responsibilities

5.1.1. The Director, Deputy Director, and Project Managers of the Foundation are responsible for implementing this Policy within the scope of their authority. If needed, they may seek support from an appointed SEA focal point within partner structures (for example, within UN agencies).

5.1.2. The general responsibilities of leaders include:

a) ensuring that all personnel are informed about and regularly reminded of the content and requirements of this Policy;

b) leading by example to foster and maintain an environment that prevents sexual exploitation and abuse;

c) taking immediate and appropriate action in response to any reports or complaints related to SEA, including suspected retaliation or other violations;

d) ensuring, as the person responsible for SEA matters, that regular mandatory training on SEA is provided to all personnel;

e) integrating issues of sexual exploitation and abuse into outreach campaigns, training, and meetings with affected individuals, with particular attention to vulnerable groups, and ensuring effective mechanisms for reporting incidents (as described in Section 6.1);

f) promoting cooperation with local organizations, including women's groups, organizations working with persons with disabilities, and other vulnerable groups, to raise awareness of zero-tolerance policies on sexual exploitation and abuse. Where possible, initiate joint activities to create gender-sensitive environments and effective reporting mechanisms.

5.2. Responsibilities of Personnel

All staff of the Foundation, in addition to the requirements of Section 4.5, are expected to:

a) familiarize themselves with this Policy and understand its content;

b) complete mandatory training on SEA;

c) report all known, potential, or suspected cases of SEA of which they have become aware or about which they have received information (in accordance with Section 6.2);

d) cooperate with persons responsible for investigations;

e) maintain confidentiality regarding any reported incident;

f) familiarize themselves with the Foundation's Code of Ethics and Business Conduct and sign the acknowledgment form confirming their commitment to comply with it.

5.3. Responsibilities in the Event of an Investigation

5.3.1. The Director of the Foundation or the designated SEA focal point has the authority to organize an appropriate investigation of possible cases of sexual exploitation and abuse within the Foundation. If necessary, the investigation may involve external experts.

5.3.2. All reports, regardless of the channel through which they are submitted, must be immediately communicated to the Director of the Foundation. Reports may be submitted anonymously and will be treated with confidentiality.

5.3.3. After receiving a report, the designated person conducts a preliminary assessment. If the preliminary assessment indicates reasonable grounds to believe that a violation has occurred, a full investigation shall be initiated in accordance with the Foundation's procedures.

5.3.4. All participants in the investigation are required to maintain confidentiality. During the investigation, the person against whom allegations have been made is presumed innocent until proven otherwise. Individuals interviewed in the course of the investigation have the right to be heard.

5.3.5. After the investigation is completed, the designated person shall prepare an investigation report containing findings and recommendations.

5.3.6. Depending on the nature and severity of the violation and in accordance with applicable law, the Director of the Foundation may decide to refer the matter to competent law enforcement authorities.

5.3.7. If medical, psychosocial, or legal support is needed, the affected person may be advised to seek assistance from appropriate service providers, including medical facilities, psychological support centers, or hotlines.

5.4. Responsibilities of the Director of the Foundation

5.4.1. The Director of the Foundation or an authorized representative initiates investigations into the conduct of individual staff members and, as necessary, informs relevant stakeholders.

5.4.2. Based on the investigation report, and after consulting with legal advisors, the Director decides on:

1. whether there are reasonable grounds to substantiate an allegation;
 2. what responsive actions are necessary to address the identified violation;
 3. the appropriateness of applying disciplinary measures;
- and communicates the final decision to the concerned individual.

5.4.3. Both the person against whom allegations have been made and any Foundation staff involved in the investigation shall be offered appropriate support, including access to psychosocial or legal assistance.

5.4.4. The Director of the Foundation also:

- a) conducts screening of new employees prior to employment;
- b) oversees assessment of personnel working with children;
- c) monitors compliance with mandatory SEA training programs.

5.4.5. Candidates for positions involving direct contact with beneficiaries or access to confidential information are required to submit a signed self-declaration (see Appendix 1 to the Human Resources Policy). The self-declaration must confirm the absence of any history of sexual exploitation, abuse, corruption, fraud, or ethical misconduct. The document is stored in the staff member's personnel file in a secure cloud environment with restricted access.

5.4.6. The Director ensures the proper storage of all documentation related to SEA, including acknowledgments of the Code of Ethics and Business Conduct, in the personnel files of employees.

6. Reporting Procedures

6.1. Reporting by Affected Persons

6.1.1. The Foundation shall ensure the availability of an effective mechanism that allows affected persons to report incidents of sexual exploitation and abuse committed by Foundation personnel. This mechanism must be transparent, accessible, and understandable to the communities with which the Foundation works. It may include:

- community-level complaint channels established in cooperation with local initiatives;
- the Foundation's hotline;
- email or other feedback mechanisms;
- the appointment of a designated person (coordinator) to receive such reports.

6.2. Reporting by Foundation Staff

6.2.1. If a staff member witnesses, becomes aware of, or has reasonable suspicion of another Foundation staff member's involvement in sexual exploitation or abuse, they are required to report it through one of the following channels:

- direct supervisor;
- Director of the Foundation;
- designated person responsible for PSEA issues (if applicable);
- local PSEA coordination center (if available);
- PSEA coordinator of a UN entity;
- hotline or email address provided on the Foundation's official website.

6.2.2. Persons receiving such reports are required to forward them immediately to the Director of the Foundation for appropriate action.

6.2.3. External partners may also use these channels to submit reports about suspected violations by Foundation personnel.

6.3. Reporting Regarding Persons Who Are Not Foundation Employees

If a report concerns individuals who are not Foundation employees but are involved in project activities (for example, staff of partner organizations or contractors), it should be forwarded to the respective employing organization. The Foundation expects that:

- the employer will inform the Foundation of the outcome of the complaint review;
- measures will be taken to provide necessary medical, psychosocial, or other support to the affected person.

7. Monitoring and Evaluation

7.1. The Director of the Foundation holds overall responsibility for monitoring the implementation of this Policy and facilitating its execution.

7.2. An internal review of the progress in implementing this Policy shall be conducted once a year.

7.3. The responsibilities of leaders in the area of preventing sexual exploitation and abuse must be reflected in their job descriptions or terms of reference (depending on the type of engagement), and taken into account during performance evaluations.

7.4. Each year, the Foundation reports to staff, donors, and partners on the number of complaints received concerning sexual exploitation and abuse, the number of confirmed cases, and the measures taken in response.

7.5. Part of this annual report shall be made available to the public. It should include information on the actions taken in response to complaints, preventive activities, and leadership accountability for compliance with and support of the Policy.

7.6. The Foundation collaborates with international, Ukrainian, intergovernmental, and non-governmental organizations to assess the implementation of this Policy and to analyze the effectiveness of joint efforts to prevent sexual exploitation and abuse.

7.7. An evaluation of the effectiveness and impact of this Policy will be carried out two years after its approval.

7.8. To ensure the confidentiality, integrity, and accessibility of information, the Foundation uses a secure cloud storage system for internal documentation. All materials related to PSEA, including reports, investigation documents, and personnel records, are stored electronically with restricted access in accordance with the Foundation's internal procedures.

Appendix 1
Confidential Report on a Case of
Sexual Exploitation and Abuse (SEA)

Date of report submission:

___ / ___ / _____

1. Reporter's information:

(This section may be left blank for anonymous reporting)

Name: _____

Position / Status: _____

Contact information: _____

2. Information about the affected person (if known):

• Name: _____

• Age (approximate): _____

• Gender: _____

• Relationship with the Foundation (e.g., beneficiary, employee, volunteer, other):

3. Information about the alleged perpetrator:

• Name (if known): _____

• Position or role: _____

• Department / Organization: _____

4. Description of the incident:

(Please provide as many details as possible: date, time, location, circumstances, what happened, whether there were witnesses, etc.)

5. Were there any witnesses?

• Yes / No / Unknown • If yes, please list names and contact information (if available):

6. What actions have already been taken?

7. Additional information or comments:

Signature: _____

Date: ___ / ___ / _____

The report should be submitted to the Director of the Foundation or via email to info@cfsrua.com. All reports are treated confidentially in accordance with the Foundation's PSEA Policy.

Transfer form

CONFIDENTIAL: Please restrict access to this document and keep it in a secure location.

Note: Please retain a copy for internal organizational record keeping and future actions.

Sending agency	

Receiving agency	
Agency / organization:	Contact person:
Phone:	Email:
Address:	

Information about the victim	
Full name:	Phone:
Address:	Age:
Gender:	Country of registration:
Language:	Identification number
If the victim is a minor (under 18 years old):	
Full name of the main guardian:	Degree of kinship with the child:
Guardian's contact information:	Is the child separated from his parents or from the adults accompanying him? <input type="checkbox"/> Yes <input type="checkbox"/> No
Is the Guardian informed of the referral? <input type="checkbox"/> Yes <input type="checkbox"/> No (if "no", then explain)	

Background information / reason for referral and services already provided	
Was the victim informed of the referral? <input type="checkbox"/> Yes <input type="checkbox"/> No (if "no", please explain below)	Was the victim sent to any other organisation? <input type="checkbox"/> Yes <input type="checkbox"/> No (if "no", please explain below)

Requested services

<input type="checkbox"/> Mental health services	<input type="checkbox"/> Security services	<input type="checkbox"/> Shelter
<input type="checkbox"/> Psychosocial support	<input type="checkbox"/> Legal assistance	<input type="checkbox"/> Financial assistance
<input type="checkbox"/> Social services	<input type="checkbox"/> Education	<input type="checkbox"/> Food
<input type="checkbox"/> Medical assistance	<input type="checkbox"/> Support by providing livelihoods	<input type="checkbox"/> Support for children born as a result of SEN

Please explain the need for all requested services:

Consent to the transfer of information. (Read the document with the victim / Guardian and answer any questions before he / she signs below. Sign on behalf of the victim / guardian if the consent is given orally and the victim / guardian cannot sign this document).

I, _____ (**full name of the victim**), understand that the purpose of providing and disclosing this information _____ (name of the agency receiving) is to ensure the safety and continuity of services provided by their suppliers who strive to serve their client. The service provider, (name of the organization sending), clearly explained to me the procedure for sending and listed the exact information that should be disclosed. By signing this form, I authorize the disclosure of this information.

Signature of the responsible person (victim or guardian, if the case concerns a child):

Date (DD / MM / YY):

Подробиці направлення

Any contact or other restrictions? Yes No (if "no", please explain below)

Referral delivered via phone (emergency only) email electronic means of communication (such as a software application or database) in person

Follow-up actions are expected via: phone (emergency only) email in person.

Up to (DD / MM / YY):

News agencies agree to exchange in the future:

Recipient'S full name and signature: _____ Date of receipt (DD / MM / YY): _____