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Policy on Prevention of Sexual Exploitation and Abuse

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1. General provisions

1.1. The Regulation on the Policy on Prevention of Sexual Exploitation and Abuse (from now on referred to as the PSEA Policy) of the Charitable Organization "New



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Dawn" (from now on referred to as the Organization) is developed and based on the Constitution of Ukraine, the Law of Ukraine "On Ensuring Equal Rights and Opportunities for Women and Men," certain articles of the Criminal Code of Ukraine, the Code of Administrative Offenses, the UN Convention on the Elimination of All Forms of Discrimination against Women, the UN Protocol against Sexual Exploitation and Abuse, the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse of 09.10.2003, the Key Principles of the UN Task Force on Protection from Sexual Exploitation and Abuse in Humanitarian Crises of 2002 and the UN Policy Guidelines on Prevention of Sexual Exploitation and Abuse approved by the Inter-Agency Standing Committee (IASC) at the Inter-Agency Forum of Humanitarian Partners on 12 September 2019.

1.2. For this Policy, the following definitions are used:

Sexual exploitation and abuse means the obtaining of financial or other benefits by means of coercion, including through the abuse of a person's vulnerability, to perform sexual services or other sexual activities, including the use of a person for prostitution, participation in sexual activities, production of pornographic materials or objects, or treatment or maintenance in sexual slavery.

Sexual exploitation is any abuse or attempted abuse of a position of vulnerability, power or trust for sexual purposes, including, in particular, the acquisition of monetary, social or political benefits from the sexual exploitation of another person. The subject of sexual exploitation may be:

- food, multipurpose cash assistance, property, access to services, training, employment, etc;
- denial of access to assistance with a demand to receive sexual services in exchange for it;



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In sexual exploitation, there is an exchange for something.

Sexual abuse - means a physical act or threat of a physical act against sexual inviolability, either by force or under unequal conditions or coercion. Sexual assault includes unwanted touching and physical contact (with or without penetration, with or without force), unpleasant conversation, or sexual acts that do not involve contact. Any sexual activity involving non-consensual people is sexual abuse.

Sexual harassment is every unwanted sexual behavior expressed verbally or physically, with the intent to humiliate or offend a person. Such behavior may be evaluated as other actions of a sexual nature, which will be perceived and evaluated in the same way. Sexual abuse conduct may be used to create barriers to work performance or serve as a condition of employment, and as a result, create an offensive and threatening environment.

Allegation of sexual exploitation and abuse leads to a report of sexual exploitation or abuse that, after appropriate investigation, is determined to contain sufficient information to initiate an investigation.

Authorized Persons - employees of the Organization that exercises control, processes data, and has access to information about any violations, and is responsible for registration and further processing of Ethics and Conduct matters.

Beneficiaries - individuals, groups, or organizations that receive the relevant benefit, directly or indirectly, as part of the implementation of projects, programs or activities of the Organization.

Child - any person under 18 (regardless of the local/regional specifics of determining the age of majority).

Suspicion - a cause of anxiety or concern that is not supported by evidence and is not recognized as true at a certain stage. In the context of sexual exploitation and abuse, a suspicion and/or rumor that someone from the Organization's staff or other persons involved in the Organization's activities or organizations/entities have.



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Data protection is the systematic implementation of institutional, technical, and organizational measures to protect the right to privacy and data protection in the context of the collection, storage, use and disclosure of personal data.

The initial assessment is a review of the information received to determine whether an investigation should be initiated (whether the facts are sufficient to bring charges of sexual exploitation and abuse) or to collect additional information to make a decision.

Investigation is an analytical process that gathers information to determine whether a violation of the relevant law has occurred and, if a violation is confirmed, to bring the perpetrators or organizations to justice.

Violation means sexual abuse, sexual exploitation or sexual harassment. Notice of Allegation - a written communication sent by a responsible entity to a designated party, stating the facts that form the basis for the allegation and requesting the party to provide comments. It is usually sent during an investigation.

Report of a potential incident involving sexual exploitation and abuse - information provided (by the complainant or another person (source)) about behavior that may contain signs of a violation of the SEA Policy but requires verification.

Subject of the report/investigation - a person whose actions are the subject of the investigation/report.

Substantiated report - the investigation has established that there is sufficient evidence to establish that acts of sexual exploitation and abuse have occurred.

Unsubstantiated report - the available evidence was insufficient to complete the investigation or the investigation concluded that the evidence was insufficient to establish that acts of sexual exploitation and abuse had occurred for a number of reasons - this does not always mean that the allegation was found to be false.

Zero Tolerance Policy - a policy that prohibits any manifestation of sexual exploitation and abuse by the Organization's personnel, including implementing



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partners, and establishes mandatory accountability in case of such actions.

The policy of zero tolerance to sexual exploitation and abuse at the “New Dawn” is an important element of our work, and we implement it at all levels of the organization.

1. Prevention of SEA: We actively take measures to prevent any form of sexual exploitation and abuse among staff and partners. This includes continuously raising awareness of the seriousness of SEA among our staff and partners, organizing trainings on ethical behavior and professional standards in our interactions with beneficiaries, and implementing mechanisms to prevent such cases.
2. Clear message that SEA is unacceptable: We clearly communicate to our employees, contractors and partners that any form of SEA is unacceptable and will result in serious consequences. The zero-tolerance policy is communicated to each team member at the time of hiring or contracting.
3. Reporting mechanisms: Our organization has established confidential channels for reporting cases of SEA. Any employee or beneficiary can report an incident without fear of retaliation or harassment. All reports are reviewed immediately by the organization's Management and Legal Officer, in compliance with the principle of confidentiality, to protect victims and ensure proper investigation (hotline +380996350810, a separate email address - complains@newdawn.org.ua, or an anonymous box located at the hub in Odesa, 8 Gagarina Avenue).
4. Investigation and accountability: We ensure that all allegations of SEA are investigated thoroughly and impartially. If a violation is found, we will take disciplinary action, including dismissal or termination of contract. This applies not only to employees, but also to freelancers and contractors.



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5. Control of contractors and partners: We closely monitor our partners' and contractors' compliance with our SEA policy. If contractors do not fulfill their obligations to prevent or investigate SEA, we may terminate their cooperation and cancel their contracts.
6. Preventing abuse of authority: We recognize that in the context of humanitarian assistance, there is often significant power inequality between staff and beneficiaries. The use of this power for sexual purposes is completely unacceptable and is strictly prohibited.
7. Zero tolerance for impunity: We will not tolerate an atmosphere of impunity in matters of SEA. All individuals, regardless of their status, will be held accountable for their actions.

This policy is an integral part of our efforts to create a safe, respectful and secure environment for both our employees and those we serve.

1.3. Principles and standards of the SEA Policy:

All personnel of the Organization is obliged to create and maintain an environment within and outside the Organization to prevent sexual exploitation and abuse;

- any sexual acts against children under the age of 18 are prohibited. Misconception of the child's age is not an excuse;
- exchange of sexual services for money, work, goods or services (including hiring sex workers) is prohibited;
- abuse of power or authority to engage in sexual relations with a beneficiary is prohibited;
- The organization's staff is obliged to report any suspicions of sexual exploitation and abuse. When an employee of the Organization has fears or doubts that any of his/her colleagues are committing sexual exploitation or abuse, he/she must report such fears through the established reporting channels (hotline, mail, box);



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- sexual exploitation and abuse are gross misconduct that is grounds for dismissal.

1.4. All forms of sexual exploitation and abuse are a violation of human rights and an abuse of power over a person in a vulnerable situation or a subordinate position. Sexual exploitation and abuse can lead to long-lasting, negative consequences for victims. Manifestations of any form of sexual exploitation and abuse in the Organization undermine its reputation and negatively affect the ability to achieve the goals and objectives of the Organization.

1.5. Abuse of power over a person in a vulnerable situation or a subordinate position. Sexual exploitation and abuse can lead to long-term, negative consequences for victims. Manifestations of any form of sexual exploitation and abuse in the Organization undermine its reputation and negatively affect the ability to achieve the goals and objectives of the Organization.

1.6. The SEA Policy is a basic document that defines organizational principles, standards, and requirements for the prevention of sexual exploitation and abuse. It is binding on all organization personnel.

1.7. The SEA Policy defines the principles, standards, and procedures that are mandatory for the Organization's staff to follow, which are designed to prevent sexual exploitation and abuse and respond to possible manifestations of sexual exploitation and abuse against the Organization's beneficiaries, other employees and any representatives of vulnerable groups during and after working hours of employees.

1.8. All the Organization's staff, engaged experts, beneficiaries, and other persons related to the Organization's direct activities have equal rights to impartial investigation and protection without discrimination on any grounds: age, gender, nationality, place of residence/stay, race, sexual orientation, language, social status, property status, religious, political or other beliefs, health status, disability or any other grounds.

1.9. Within the framework of the SEA Policy, the Organization is committed to



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creating an atmosphere of zero tolerance for sexual exploitation and abuse in the organization, with an emphasis on prevention, awareness, and training among staff and beneficiaries.

1.10. The Organization guarantees an impartial investigation in the event of a reported incident and prosecution by the Organization's internal rules and applicable law, in the event of a substantiated allegation of sexual exploitation and abuse.

1.11. In addition to the staff, the principles and standards of this SEP Policy also apply to any persons involved in implementing the Organization's activities, including employees, partner public or charitable organizations, donor organizations, benefactors, patrons, implementing partners, contractors, consultants, volunteers, and other persons and organizations/structures involved in the Organization's activities.

1.12. The SEA Policy shall be applied by the Organization's staff during working and non-working hours, during travel, business trips, and any type of leave.

1.13. The principles and standards of the SE Policy apply to employees, engaged experts, volunteers, and other persons and organizations/structures involved in the Organization. Acquaintance and consent to comply with the SE Policy shall be certified by the signature of each member, employee, and engaged expert of the Organization and kept together with the application (for members of the Organization), personal file (for employees), copies of individual documents (for other persons).

1.14. The text of the SE Policy shall be posted in the organization's internal information resource.

1.15. The Authorized Person appointed by the order of the CP and the Board of Directors of the Organization shall coordinate and be responsible for the implementation of the SE Policy.

1.16. The Board of Directors of the Organization shall control the



implementation and realization of the SE Policy.

1.17. The Organization's SEP Policy comes into force after it is approved by its Board of Directors.

2. Purpose of the Sexual Exploitation and Abuse Policy

2.1. The SEA Policy reflects the Organization's commitment to high ethical standards, the desire to improve the culture, and maintain the proper business reputation.

2.2. The Organization set as goal:

- identify measures to prevent cases of sexual exploitation and abuse;
- establish precise mechanisms for avoiding and reporting cases of sexual exploitation and abuse;
- to establish the obligation of the Organization's members, employees, engaged experts, and other persons involved in the Organization's activities to know and comply with the principles, standards, and requirements of this SE Policy.

3. Mechanism for preventing and responding to sexual exploitation and abuse

3.1. Prevention is a necessary part of the SEA Policy. Therefore, the Organization takes a responsible approach when selecting personnel.

3.2. When hired, the staff is familiarized with the SEA Policy and signed informed consent to comply with its provisions.

3.3 The Organization does not engage in work, partnership, patronage, volunteer or other activities of persons who are or were on the preventive registration of offenders in the National Police of Ukraine;



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- are registered in a psychoneurological or drug treatment clinic;
- were dismissed from previous jobs due to unethical behavior towards beneficiaries or colleagues. Verification of these facts is part of the Organization's personnel selection procedure. If such facts were not established during the selection of personnel or the start of cooperation with partners but became known in the course of activities, the Organization, if the facts are established, terminates cooperation with such persons.

3.4. The Organization regularly conducts information and educational work on the prevention and control of sexual exploitation and abuse (PSEA) among staff, involved experts, beneficiaries, implementing partners and participants of the Organization. This is done by conducting educational talks, distributing information materials and organizing thematic trainings. The Organization's employees are obliged to undergo knowledge updates in the format of educational videos and trainings once every 6 months. In addition, in the case of hiring a new employee to the Organization, attending a PSEA training is a mandatory condition.

3.5. The Organization participates in existing certified programs offered by UN agencies and other recognized international organizations as training on combating sexual exploitation and abuse.

3.6. The Organization informs the staff, implementing partners, and participants of the Fund about the availability of reporting mechanisms for possible incidents of sexual exploitation and abuse.

3.7. When working with beneficiaries, the Organization informs those about the existing mechanisms for reporting possible incidents of sexual exploitation and abuse.

3.8. When conducting monitoring activities, authorized representatives assess



the awareness of beneficiaries and implementing partners about the inadmissibility of sexual exploitation and abuse and the availability of reporting mechanisms.

3.9. Cases of abuse of the grievance mechanisms may be subject to sanctions against employees of the Organization.

3.10. The organization takes the necessary measures to guarantee the confidentiality of the complainant and other interested parties.

3.11. Monitoring mechanisms for sub-partners

Regular reports: Sub-partners must submit reports on the implementation of the PSEA policy (including the number of trainings, appeals, investigations, etc.).

Risk assessment: Periodic assessment of the risks of sexual exploitation in projects where sub-partners are involved.

Compliance audit: Implement regular audits to verify that sub-partners comply with the PSEA policy.

Complaints systems: Ensure access to anonymous complaint mechanisms for stakeholders. Use of two sources of complaints, sub-partners (mail, hotline), as well as specifying the mail, telephone numbers for complaints of the partner. For transparency of control and alternative sources of complaints and suggestions.

3.12 Tools to strengthen monitoring

Single database: Implement a centralized database to register cases of sexual exploitation, abuse, as well as trainings and prevention actions carried out.

Training and testing: Regular training of staff and sub-partners using knowledge testing to check the level of awareness.



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Performance indicators: Establish key indicators (e.g. number of trainings, number of complaints investigated) and monitor them regularly.

Collaboration and exchange of experience: Organize joint meetings with donors, sub-partners and stakeholders to share best practices and agree on monitoring approaches.

3.13 Integrating screening questions related to the prevention of sexual exploitation and abuse (PSEA) into the staff recruitment process is an important step in the integration of a new employee into the Morning of the Renaissance Foundation. Scenario questions: Add questions to interviews that allow assessing the candidate's attitude to ethical standards, confidentiality and work with vulnerable groups. Use tools to assess the candidate's values and ethical principles, such as psychological testing or ethical thinking assessment. Check the candidate's past experience. Recommendations: Ask for references from previous employers with clear questions about the candidate's adherence to ethical standards. Inform during hiring. PSEA Policy Awareness: New employees must sign a document acknowledging that they are familiar with the PSEA policy and commit to complying with it. Mandatory Training for New Employees All new employees must receive mandatory PSEA policy awareness training within the first two weeks of employment.

4. Responsibility in case of violation of the provisions of the Sexual Exploitation and Abuse Policy

4.1 The Organization applies sanctions due to proven violations of the provisions of the SEP Policy. Such sanctions include termination of the employment contract for serious violations without compensation. Relevant provisions governing



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the application of sanctions shall be included in all employees' employment contracts.

4.2 The Organization has the right to apply contractual sanctions, including termination of contracts with implementing partners and termination of service or supply contracts with suppliers. Relevant provisions governing contractual sanctions shall be included in all contracts with suppliers of services and goods.

4.3. In case of proven accusations against the members of the Organization, the Board of Directors will consider and decide on excluding such members from the Organization.

4.4. When responding to requests from third parties regarding the reasons for the dismissal of employees or termination of relations with individuals or legal entities, the Organization undertakes to report proven facts of violations of the provisions of the SEA Policy.

4.5. If there is a reasonable suspicion of committing a crime against sexual inviolability or other crimes, by the Criminal Code of Ukraine, the Organization will report the facts to the relevant law enforcement agencies.

5. Procedure for reporting and handling incidents and suspicions of sexual exploitation and abuse

5.1. The Organization's staff and beneficiaries may report an incident or suspicion of sexual exploitation and abuse, witnesses of the incident or any other victims of sexual exploitation and abuse.

5.2. If employees of the Organization witness violations of the SEA Policy, it is their duty to notify the authorized persons immediately. The report by the employee should be detailed and include information, facts or suspicions about the case of sexual exploitation and abuse, information about the victim, the perpetrator, and



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witnesses.

5.3. To avoid a conflict of interest, the Organization shall appoint at least two authorized persons to receive the report if the report concerns an authorized person.

5.4. The Organization creates, maintains, and disseminates information about the availability of channels for receiving reports: a written complaint to the Organization, a telephone number for reports with working hours (hotline of the Organization +380996350810), a separate e-mail address - complaints@newdawn.org.ua.

5.5. In order to ensure anonymity in the process of filing and processing complaints, the organization uses the following measures:

1. Confidential reporting channels: All channels for receiving complaints (written form, hotline, e-mail) are designed to protect the person submitting the complaint. They are designed to accept reports in any convenient way, providing the opportunity to submit a complaint anonymously.
2. Anonymity of the hotline: The reporting hotline (+380996350810) allows a person to file a complaint without revealing their identity. Information received through the hotline is recorded without the need to identify the caller.
3. Email anonymity: Complaints sent to complaints@newdawn.org.ua can be sent from any account, including anonymous accounts. Only the Chairman of the Board and the organization's Lawyer have access to this email address, which reduces the risk of data disclosure or interference by other employees.
4. Security of written complaints: Written complaints are recorded in a special logbook that is kept in a safe. Only authorized persons have access to this log, ensuring that the information is protected and cannot be accessed by other employees.



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5. Limited access to information: All complaints are handled exclusively by those directly responsible for the investigation. This includes limited access to information and confidentiality, even within the organization.

These measures ensure that the process of filing and processing complaints is anonymous and confidential, creating an atmosphere of trust and security for those who report violations.

5.6. The authorized person shall assess the report and submit its results to the Director of the Organization.

5.7. If the initial assessment concludes that the suspicion is justified, the Director of the Organization shall order to establish a temporary commission consisting of at least three persons for administrative investigation of the case.

5.8. The investigation commission may include the Directors of the Board of the Organization, individual members of the Organization and representatives of the donor or partner organization, and independent experts. The commission may not include persons concerned by the notification. If the report concerns an authorized person, he/she shall be suspended from performing his/her duties for the duration of the investigation.

5.9. As part of the investigation, the persons who made the report, victims, witnesses, and subjects of the inquiry may be interviewed to clarify the circumstances. Persons involved in the interview shall sign and consent to participate in the investigation.

5.10. The personal data of persons who file a report and are involved in the investigation shall be treated as strictly confidential.

5.11. The Commission analyzes the information obtained during the investigation and prepares conclusions on confirmation or non-confirmation of the facts of sexual exploitation and abuse. The investigation may last up to three months.



5.12. The conclusions of the investigation commission are considered during an extraordinary meeting of the Organization, which decides on the necessary sanctions. If the report concerns a member of the organization committee, this person will be removed from it.

5.13. All persons involved in the investigation of the report shall sign a form on non-disclosure of details that may harm the affected person.

5.14. Within the scope of his/her authority, the authorized person shall provide the affected person with the necessary support in the form of information on available security resources, and psychological, legal, medical and other essential assistance.

6. Responding to cases of sexual exploitation and abuse

6.1. By the investigation's conclusions, the organization's commission decides how to react to the reports conclusions.

6.2. If the report is not substantiated and the violation of the SE Policy is not confirmed, no action is taken.

6.3. If the investigation findings indicate evidence of violations of the SE Policy, or if the subject of the investigation admits guilt, the employee is dismissed.

6.4. If the conclusions relate to confirmed cases of sexual exploitation and abuse with the participants of the Organization, the Organizations committee considers the termination of such participation.

6.5. If the confirmed cases relate to commercial contracts, they are terminated.

6.6. If the confirmed cases relate to donors, benefactors, patrons, volunteers and others, cooperation with them is terminated.

6.7. If the report contains signs of a criminal offense, it is forwarded to the



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relevant law enforcement agencies, regardless of the conclusions of the internal investigation, but is subject to the informed consent of the adult victim.

6.8. If the report concerns a child, the public Service for Childrens Protection and the law enforcement agencies shall be notified immediately within 24 hours, regardless of the results of the internal investigation.

Approved and signed by:

Yulia Pogrebna _____

Victoria Didovets _____

Franke Philipp _____

