

**Policy on Protection from Sexual Exploitation, Abuse and
Harassment (PSHEA)
of the Polish Center for International Aid (PCPM) Foundation**

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1. Purpose of the Policy

- 1.1. The purpose of the Policy on Protection from Sexual Exploitation, Abuse and Harassment is to ensure that PCPM takes all possible measures to prevent sexual exploitation, sexual abuse and sexual harassment, both among personnel and in interactions between personnel, including the Management Board and management staff, and project participants. PCPM makes every effort to respond appropriately to reported incidents and to provide support to both the subject of the incident (survivor) and the persons reporting the incident (whistleblowers).
- 1.2. In order to achieve the objectives set out above, PCPM adopts principles consistent with the United Nations Inter-Agency Standing Committee policy on protection from sexual exploitation and abuse in humanitarian crises:
 - 1.2.1. Any sexual contact between PCPM humanitarian and development mission personnel and project participants is strictly prohibited. Such relationships undermine the credibility, integrity and impartiality of humanitarian assistance.
 - 1.2.2. The exchange of money, goods, services or employment in return for sexual services or other forms of humiliating or degrading behaviour is prohibited. This applies in particular to the exchange of sexual services for humanitarian assistance.
 - 1.2.3. PCPM humanitarian and development mission personnel are required to create and maintain an environment that prevents sexual exploitation. Managers have a particular responsibility to support and develop systems that sustain such an environment.
 - 1.2.4. Where an employee or volunteer of a humanitarian or development mission has witnessed sexual exploitation or has reason to suspect that a colleague is sexually exploiting project participants, they are required to report the matter to the designated persons within their organisation or, where the matter concerns an employee of another organisation, to the relevant inter-agency authorities.
 - 1.2.5. Sexual exploitation of project participants by humanitarian and development mission personnel constitutes misconduct and is grounds for disciplinary dismissal of an employee or immediate termination of a volunteer agreement.
 - 1.2.6. Sexual contact with minors (persons under 18 years of age) is prohibited, regardless of local customs or laws concerning the age of consent. A mistaken belief regarding the age of a minor does not constitute a defence.

2. Glossary of Terms

PCPM Partners: Entities with which PCPM establishes cooperation and from which it expects adherence to similar principles of ethics and compliance.

PCPM: The Polish Center for International Aid (PCPM) Foundation. A non-political non-governmental organisation whose mission is to provide humanitarian, development and emergency assistance to people in need around the world.

PCPM Personnel: Refers to all persons covered by this Policy, including employees, regardless of their position or type of employment (employment contract, civil law contract, B2B contract), including the Management Board and management staff; associates, volunteers, partner organisations and any other persons acting on behalf of PCPM, both in Poland and in other countries. The provisions of this Policy also apply to entities and subsidiaries operating domestically and abroad, as well as partners cooperating with the Foundation.

Project Participants: Persons to whom PCPM provides humanitarian, development and emergency assistance. PCPM treats these persons with respect for their agency, wellbeing and interests.

Sexual Abuse: Refers to actual or potential physical intrusion through the use of force or under unequal conditions.

Sexual Exploitation: Refers to any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes; this includes profiting financially, socially or politically from the sexual exploitation of another person.

Sexual Harassment: Refers to actual or potential unwelcome sexual advances between members of the organisation.

3. Mechanism for Reporting and Raising Concerns about Sexual Exploitation, Abuse and Harassment

3.1. Reporting Procedures

- 3.1.1. PCPM is committed to responding promptly and effectively to all reports concerning sexual exploitation, abuse and harassment. This prevention mechanism sets out the procedure to be followed when reporting allegations, suspicions and concerns related to PSHEA. All PCPM employees, including the Management Board and management staff, are required to report any allegations or concerns regarding misconduct of which they become aware to the Safeguarding Officer and to cooperate with investigative processes, where necessary.
- 3.1.2. PCPM treats all reports with the highest degree of confidentiality and makes every effort to protect the identities of survivors, witnesses and whistleblowers.

3.2. Reporting a Concern

- 3.2.1. A report may be made orally or in writing by a survivor, family member, friend or witness.
- 3.2.2. If PCPM personnel have concerns or suspicions regarding sexual exploitation or abuse by a colleague, they are required to report it.
- 3.2.3. A report may be submitted by telephone using the number provided on the PCPM website, by email at safeguarding@pcpm.org.pl, or via the form available on the PCPM website: [Report Form - PCPM](#). Reports may also be submitted in Ukrainian or English. Where possible, the report should include as much relevant information as possible, as well as any documents or other supporting materials that may assist in assessing the reported matter.

4. PCPM Policy for Handling Reports of Violations

4.1. Handling Process for a Reported Violation:

- 4.1.1. If the reported violation does not involve PCPM personnel, volunteers and/or partners, the Safeguarding Officer refers the project participant to a designated non-governmental organisation or helpline. In cases involving a threat to life, the matter is referred directly to the Polish Police or social services, in accordance with the requirements of Polish law. In the case of an overseas mission, the matter is referred to the relevant authorities in the country where the incident occurred, in accordance with local law.
- 4.1.2. If the incident concerns PCPM personnel, including the Management Board and management staff, volunteers and/or contractors:
 - 4.1.2.1. The Safeguarding Officer shall promptly, and no later than within 7 working days of receiving the report, confirm to the whistleblower that an investigation procedure has been initiated;
 - 4.1.2.2. The Safeguarding Officer appoints a three-member committee to review the complaint;
 - 4.1.2.3. The committee reviews the complaint. Only committee members have access to information concerning the incident and the persons involved;
 - 4.1.2.4. If the incident concerns a Member of the Management Board, a Member of the Foundation's Supervisory Board shall be appointed to the committee reviewing the report. If the incident concerns a Member of the Supervisory Board, a Member of the Management Board shall be included in the committee;
 - 4.1.2.5. Where there are reasonable grounds to do so, an external adviser with appropriate expertise and experience in conducting investigations of this nature may be appointed to the committee;
 - 4.1.2.6. The Safeguarding Officer is responsible for organising and administering the reporting system, ensuring the proper processing and documentation of submitted cases, including

follow-up actions, conducting a preliminary review of the content of reports, providing responses to whistleblowers within the required time limits, maintaining a register of reports, and ensuring their archiving.

4.2. Investigation Process for a Reported Violation

- 4.2.1. The committee, led by the Safeguarding Officer, develops a clear and comprehensive investigation plan in accordance with the following framework:
 - 4.2.1.1. Formulation of the allegations
 - 4.2.1.2. Identification of the applicable legal provisions and internal policies to which the report relates.
 - 4.2.1.3. Identification of the personnel involved.
 - 4.2.1.4. Specification of the stages and timeline of the investigation process.
 - 4.2.1.5. Description of potential risks (to the organisation and to individuals) and measures to avoid or mitigate such risks.
- 4.2.2. The committee has access to all information and documents held by PCPM that may be relevant to the investigation.
- 4.2.3. The committee may invite witnesses to meetings, for which a detailed summary is prepared and confirmed by the signature of the person interviewed in relation to the investigation.
- 4.2.4. The outcome of the investigation is a report setting out the established facts, conclusions and recommended remedial actions. The report is provided to the relevant persons and/or organisational units, in accordance with the specific circumstances of the case.
- 4.2.5. The Safeguarding Officer reports the conclusions of the investigation and the investigation process, as appropriate, to the PCPM Management Board and Supervisory Board, and prepares an annual report on the activities undertaken.
- 4.2.6. Where justified, the relevant law enforcement authorities will be notified of the matter.

4.3. Documentation of Violations and Data of Persons Involved:

- 4.3.1. Each case is carefully documented. The register of reports is maintained electronically by the Safeguarding Officer, ensuring the confidentiality of the data and enabling the efficient identification of each case.
- 4.3.2. Both the whistleblower and the survivor are protected and provided with appropriate support.
- 4.3.3. A final report is prepared for each investigation, containing information on the course of the investigation, its conclusions, as well as the actions taken and recommendations for the future.
- 4.3.4. The contact details of the person reporting the violation (whistleblower), as well as the content of the report, are treated as confidential. The committee reviewing the report does not include persons directly involved in the implementation of humanitarian

activities and, at the initial stage, consists only of selected personnel at the Warsaw office.

- 4.3.5. Each report is processed in accordance with the applicable policy on reporting misconduct and violations of the law. PCPM's priority is to ensure the safety of the whistleblower and the survivor, so that their personal data are not disclosed to the persons against whom the complaint has been made unless they themselves have given their consent.

5. Communication and Awareness-Raising Activities

- 5.1. The PCPM Safeguarding Officer initiates and conducts communication, training and awareness-raising activities concerning ethical principles and the Policy on Protection from Sexual Exploitation, Abuse and Harassment, and provides advice and information on these matters.
- 5.2. Periodic refresher training should be conducted regularly in accordance with the PCPM training schedule set out in the Foundation's applicable training procedure.

6. Implementation and Monitoring

6.1. Implementation of the Policy

Every new employee, associate and volunteer is required to familiarise themselves with the Policy on Protection from Sexual Exploitation, Abuse and Harassment (PSHEA) of the Polish Center for International Aid (PCPM) Foundation within 7 days of commencing their cooperation with PCPM.

6.2. Consequences of Violating the Policy

A violation of the provisions of this Policy constitutes a gross breach of fundamental employment duties or obligations arising from another agreement serving as the basis for activities undertaken on behalf of or for the benefit of PCPM. Disciplinary measures or other actions provided for under generally applicable law may be taken, including through criminal or civil proceedings. Where justified, the relevant law enforcement authorities will be notified of the matter. Any liability incurred by the Foundation does not exclude the individual liability of natural persons holding managerial, management or supervisory positions, as well as representatives, contractors, employees or other persons engaged by PCPM, whether on a fixed-term or indefinite-term basis.

6.3. Monitoring and Evaluation of the Policy

This document shall be reviewed annually in order to introduce any necessary amendments or adjustments.