

SEA/SH Response Procedure under PREPARE Ukraine Project Grievance Mechanism

The PREPARE Ukraine Project is committed to creating and maintaining an environment in which any gender-based violence (GBV) and Sexual Exploitation and Abuse/Harassment (SEA/SH) have no place, and where they will not be tolerated by any involved Project worker, subcontractor, supplier, representative of the contractors or Project initiator/beneficiary. The Codes of Conduct have been developed to prevent and address SEA/SH and GBV risks that will be applied for all Project workers, contractors, suppliers, and partners.

The PREPARE Ukraine Project will ensure procedures to handle any **sensitive and confidential complaints**, including those related to **Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH)** in line with the [World Bank ESF Good Practice Note on SEA/SH](#).

All complaints related to SEA /SH, or other GBV forms shall be reviewed in accordance with a survivor-centered approach and in compliance with the following principles:

- **Confidentiality** — information about the complaint, the survivor, and the circumstances of the incident shall be disclosed only to authorized persons, and solely to the extent necessary for an appropriate response.
- **Safety of the survivor** — all actions shall be carried out with due consideration of potential risks to the survivor and shall be aimed at preventing further harm.
- **Informed consent** — any further actions, including the transfer of information or referral to support services, shall be taken only after the survivor has been provided with clear and understandable information and has given their consent.
- **Non-discrimination** — each complaint shall be reviewed impartially, with respect for the dignity, rights, needs, and choices of the survivor.
- **Protection from retaliation** — filing a complaint in good faith or participating in its review shall not give rise to negative treatment, harassment, or any other adverse consequences.

The safety, choices, and well-being of the survivor are the primary concerns at every stage. The project guarantees that no person will face professional or personal repercussions for filing a good-faith report.

If such a SEA/SH case occurs within the Project, any survivor is given an opportunity to submit a confidential complaint via dedicated channels with restricted access only for responsible grievance management staff:

- **Email box for confidential grievances:** grievanceprepare@gmail.com (please indicate **Subject: SEA/SH** for proper identification)
- **Special secure lockable boxes** for confidential complaints will be placed in the premises of the Project, where there is no direct video surveillance, to ensure anonymity.

The receipt of such sensitive complaints will be acknowledged immediately after receipt. The GM Manager shall, within 24 hours of receipt of the complaint, notify the SEA/SH incident to the PIU, with a copy to the World Bank, and shall provide an anonymized summary of the complaint based on pre-established information exchange protocols. The GM Manager shall ensure that the information collected regarding the complainant and the allegations complies with the principles of confidentiality, anonymity, and consent. If a SEA / SH incident is confirmed to be related to the Project, relevant corrective action shall be taken against the perpetrator in line with Project procedures and national legislation.

Confidential referral of survivors to relevant gender-based violence support services (health, legal, psychosocial, security or other assistance) **shall be ensured** based on the consent, needs and wishes of survivors.

Several external channels are available at national level that provide for professional support in addressing SEA/SH related issues including but not limited by:

<p>24/7 La Strada Ukraine 0-800-500-335 or 116-123</p>	<p>The hotline for the prevention of domestic violence, human trafficking and gender discrimination works 24/7, providing psychological and legal assistance, advice on services to combat gender-based violence.</p>
<p>24/7 National Police of Ukraine 102</p>	<p>Mobile brigades of the National Police of Ukraine for operational response to domestic violence (DV) or gender-based violence (GBV) are authorized to help victims of domestic violence. The police can also refer victims to medical and psychosocial services, as well as shelters for temporary accommodation. If necessary, victims can also approach police departments/offices and district police officers.</p>
<p>24/7 Government's hotline 15-47</p>	<p>The government's 15-47 hotline provides 24/7 informational advice to survivors of domestic violence or other forms of gender-based violence, violence against children, human trafficking, or those who are at risk of such violence. Victims who do not want to report the incident to the police can get help through a hotline.</p>
<p>Survivors rescue centers UNFPA Україна Центри допомоги врятованим</p>	<p>Rescue centers were created in response to the challenges of the ongoing war. Internally displaced persons, those who left the zone of active hostilities or territories occupied by Russia, local residents - anyone who needs help can get it here. Ukrainians can come to the Centers with any issue related to the war. Qualified specialists provide the necessary social, psychological, legal or informational support comprehensively and confidentially - and all this in one place.</p>
<p>Free legal assistance 0 800 213 103</p>	<p>Advice on protecting rights and filing lawsuits.</p>
<p>Ombudsman Office: Hotline 0-800-501-720, tel. 044-299-74-08, email: hotline@ombudsman.gov.ua</p>	<p>The Commissioner for Human Rights of the Verkhovna Rada of Ukraine (Ombudsman) - for filing a complaint about discrimination or harassment.</p>
<p>State Labor Service</p>	<p>State body that monitors compliance with labor</p>

<p>email: zvern@dsp.gov.ua Hotline for consultations: +380733570753 tel: +38(044) 289-85-11)</p>	<p>legislation, including protection against mobbing and harassment in the workplace</p>
<p>Legal support "YurFem" lines: Tel.: +380 68 145 55 90 or 0 800 30 55 90 (Mn-Fri 9:00–18:00). Viber/Telegram/Signal: +380 68 145 55 90.</p>	<p>In cases of sexual harassment - In case of sexual harassment and gender-based violence, including in the workplace, contact the legal helpline "YurFem: Support" - Specialized assistance from the Association of Women Lawyers of Ukraine</p>

The consideration of the SEA/ SH complaints shall be effected in line with the current national legislation, including:

- Any SEA/SH complaint shall be considered with strict confidentiality as very sensitive information that is being processed in line with the *Law "On protection of personal data"*.
- *Labor Code* - Art. 2-1 explicitly prohibits discrimination in the workplace, including sexual harassment. In line with the *Art. 40/41*, sexual harassment may be grounds for dismissal (as "committing immoral misconduct" by an employee performing educational functions, or for violation of labor discipline, if this is stipulated in the Code of Conduct).
- *Law "On Ensuring Equal Rights and Opportunities for Women and Men"*: Art.1 provides a clear definition: sexual harassment is any action of a sexual nature, expressed verbally (threats, intimidation, obscene remarks) or physically (touching, patting), that humiliates or insults a person who is in an employment, service, financial or other relationship. Art.22 obliges the employer to take measures to prevent such cases and to create a mechanism for redressing complaints.
- *Art. 152-154 of the Criminal Code of Ukraine* - In case of signs of a criminal offense, the PPP Agency shall facilitate contacting the police, based on the consent of survivors.
- *CMU Resolution No. 226 dated February 18, 2026* - the Procedure for Responding to Cases of Gender Discrimination that defines a clear mechanism for considering appeals, interacting with responsible bodies, and informing about the results of their processing.