

# Fact Sheet on Community-based Complaint Mechanism (CBCM) in referring cases of sexual exploitation and abuse (SEA) in Ukraine

## What is a community-based complaint mechanism (CBCM) in referring the allegations of sexual exploitation and abuse (SEA) in Ukraine?

This mechanism is designed to **tackle the loopholes of the existent system of referring SEA allegations** across the humanitarian community in Ukraine involving partner hotlines operational in Ukraine. It is a **complementary mechanism** that aims at **ensuring timely and effective response** to allegations of possible incidents of sexual exploitation and/or abuse committed by the United Nations (UN) or associated with the UN personnel.

## When was the CBCM rolled out in Ukraine?

The CBCM was rolled out in late **February 2021** and it required substantial preparations.

## Who are the partner hotlines?

The hotlines of PAH, La Strada, DonbasSoS, Luhansk oblast Red Cross, UNHCR hotline for IDPs, Davaj Pohovorymo hotline, NRC hotline, Save the Children.

## Were the hotline operators trained to be able to properly refer the possible SEA allegations?

The hotline operators of all partner hotlines got trained on the basic notions of SEA as well as on the mechanism and procedure of referring the allegations. Moreover, there is a standard form developed for the hotline operator to know what information needs to be retrieved and what are the DOs and DO NOTs. We also provided the hotlines with some of the reference services available for GBV and SEA survivors.

## How does CBCM correlate with internal procedures introduced in the Agency?

The CBC mechanism and the standard operating procedure **is not to be used to manage cases or conduct investigation** which is the subject matter of the implementing Agency or of the UN Agency contracting the implementing partner in question. It is to be noted that **this SOP by no means override the Agency specific procedures of handling the allegations or conducting investigations** that are to be facilitated in line with and within the timeframes stipulated by the internal policy/procedure.

## How does the CBCM operate?

The Standard Operating Procedure for referring the SEA allegations have been developed to frame a transparent and consistent mechanism. A dedicated inbox [seareferral@un.org](mailto:seareferral@un.org) was established for the purposes of receiving SEA allegations. An allegation may be received via a partner hotline, via PSEA focal point or directly to the dedicated email. *[for more details, please refer to SoPs for SEA allegations]*

## Does the confidentiality clause apply?

All SEA-related information is kept confidential. Identities are protected. Personal information on survivors is to be collected and shared only with their informed consent. Where physical records

are kept, documents are be stored safely to prevent accidental disclosures. All complainants must be made aware of confidentiality procedures and should give their explicit informed consent to proceed with recording the complaint. [for details please refer to the SoPs for SEA allegations attached]

### **Who conducts investigation of SEA case?**

An allegation is referred to the Agency in question and it is the **primary responsibility of the Agency to initiate transparent and fair investigation process**. If an alleged perpetrator is recruited by an implementing partner, then the UN contracting the partner implementing the programme bears the primary responsibility.

### **Can my Agency join the CBCM if we have proper SEA policy and procedures in place?**

While it is an **obligation of each and every Agency to have SEA policy and procedures** integrated into the daily work, the consistency and solidness of such policies differ across agencies either and depends on different factors (lack of capacity, limited knowledge of the subject matter, other priorities, etc.). Thus, by joining the CBCM **you may use this mechanism for referring the cases of your implementing partners** (while transitioning to a solid internal system) as well as **ensure** that not a single **case of SEA** will fall through the cracks, thus will be **reported and tackled** by the relevant Agency.

### **How can my Agency join the CBCM?**

If your Agency would like to join the CBCM in Ukraine or find out more about this mechanism, **please contact Yuliya Pyrig** at [pyrig@un.org](mailto:pyrig@un.org) and we will make sure your colleagues receive proper training and all the pertinent information and materials.

### **What if SEA email receives a complaint referring to misconduct but which does not constitute SEA?**

Information sharing between members of the PSEA TF Network (at national and local levels) and its partners (whilst ensuring dignity and safety of SEA victim/survivor<sup>1</sup>) is observed and when other types of requests are received on SEA data via hotlines the confidentiality clause applies by default. **All the request other than SEA allegations would also be given due consideration and are to be referred to the relevant body** (Agency, Cluster, etc.)

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<sup>1</sup> Both terms – victim and survivor - are used interchangeably throughout the document.

**FLOWCHART OF MANAGEMENT OF SEA COMPLAINTS THROUGH CBCM IN UKRAINE  
POLICY AND STRATEGIS LEVEL**

