

GOVERNANCE & POLICIES



POLICY

Sexual Exploitation, Abuse and Harassment (SEAH) Policy

Adopted by the Board of Directors

25th May 2026

KENT WITH UKRAINE LTD

www.kentwithukraine.co.uk

Sexual Exploitation, Abuse and Harassment (SEAH) Policy

This policy was formally approved by Kent With Ukraine's Board of Directors on 25th May 2026 and this policy will be reviewed annually.

This policy includes our commitment to the Prevention of Violence Against Women and Girls VAWG, Kent With Ukraine believes every person has the right to dignity, safety and protection from sexual exploitation, abuse, harassment and violence. KWU will take all reasonable and proportionate steps to prevent SEAH, respond to concerns seriously, protect survivors, uphold safeguarding standards and ensure our work in Ukraine and beyond never tolerates exploitation, abuse or misuse of power.

1. Policy Statement

Kent With Ukraine recognises that sexual exploitation, abuse, harassment and gender-based violence are serious violations of dignity, safety, human rights and trust.

KWU will:

- maintain zero tolerance for SEAH and VAWG;
- take all allegations seriously;
- protect survivors and affected persons;
- act in a survivor-centred and trauma-informed manner;
- ensure confidentiality where appropriate;
- prohibit retaliation against whistleblowers or complainants;
- take reasonable steps to prevent abuse of power;
- strengthen safeguarding in all programmes, travel, aid distribution and partnerships;
- ensure that no person uses KWU's name, role, access, funding or influence to exploit another person.

2. Purpose

Kent With Ukraine (KWU) is committed to maintaining a safe, respectful and dignified environment for all individuals connected to our work.

KWU has zero tolerance for Sexual Exploitation, Abuse and Harassment (SEAH) in any form.

This policy establishes how KWU will prevent, identify, report, investigate and respond to SEAH risks affecting:

- staff
- volunteers
- contractors
- consultants
- trustees
- beneficiaries
- displaced people
- veterans
- women and girls
- children
- vulnerable adults
- partner organisations
- local authorities
- community representatives
- visitors and delegations.

This policy is aligned with safeguarding principles, humanitarian protection standards, dignity, accountability and survivor-centred practice.

3. Scope

This policy applies to all KWU-related activity, including:

- humanitarian aid delivery;
- partner engagement;
- donor-funded projects;
- schools and youth initiatives;
- veteran initiatives;
- local authority and municipal partnerships;
- field travel and delegations;
- digital communications;
- meetings and events;
- accommodation and transport;
- online environments;
- third-party delivery.

This policy applies in the UK, Ukraine and any location where KWU operates.

4. Definitions

Sexual Exploitation

Any actual or attempted abuse of a position of vulnerability, power or trust for sexual purposes, including profiting socially, politically, financially or personally.

Examples include:

- requesting sexual acts in exchange for aid, support or influence;
- coercive relationships with beneficiaries;
- exploiting vulnerable persons for sexual gain.

Sexual Abuse

Any actual or threatened sexual activity carried out by force, coercion, intimidation, manipulation or without informed consent.

Examples include:

- assault;
- coercion;
- forced touching;
- rape;
- sexual violence;
- attempted abuse.

Sexual Harassment

Any unwelcome sexual behaviour that violates dignity or creates an intimidating, hostile, humiliating or offensive environment.

Examples include:

- sexual comments;
- repeated unwanted contact;
- inappropriate messages;
- coercive flirting;
- sexual jokes;
- intimidation;
- unwanted touching;
- abuse online.

Gender-Based Violence (GBV)

Violence or abuse directed at someone because of sex, gender, gender identity or unequal power dynamics.

Examples includes:

- sexual violence;
- coercive control;
- abuse linked to vulnerability or dependency;
- domestic abuse;
- forced marriage;
- exploitation;
- intimidation.

5. Violence Against Women and Girls (VAWG) Statement

Kent With Ukraine recognises that violence against women and girls remains one of the most serious global safeguarding and human rights concerns, particularly in conflict-affected and displacement settings.

KWU acknowledges that war, displacement, trauma, poverty, loss of services and social instability can heighten risks of exploitation, abuse and violence.

KWU will take reasonable and proportionate steps to ensure its work does not contribute to or ignore such harm.

KWU is committed to:

- preventing abuse, intimidation and exploitation of women and girls;
- promoting dignity, safety and equality;
- recognising power imbalances;
- ensuring women and girls can raise concerns safely;
- responding seriously to disclosures of abuse;
- integrating safeguarding into humanitarian and community activity;
- respecting survivors and avoiding victim-blaming;
- ensuring no KWU representative uses authority, aid access, transport, accommodation, influence or partnership roles to exploit women or girls.

KWU also recognises that men, boys and gender-diverse persons may also experience SEAH and abuse, and all survivors will be treated with equal seriousness, dignity and care.

6. Zero-Tolerance Rules

The following are strictly prohibited. Any KWU representative must not:

- exchange aid, access, transport, money, accommodation, influence or services for sexual activity;
- engage in sexual exploitation;
- sexually harass any person;
- abuse authority or trust;
- threaten, pressure or manipulate individuals into sexual conduct;
- use a role within KWU for personal sexual gain;
- retaliate against a complainant;
- ignore known abuse;
- facilitate abuse by others;
- consume or share sexual exploitation material;
- sexually exploit conflict-affected people, displaced persons, children, vulnerable adults or beneficiaries.

Failure to report known abuse will itself be treated as serious misconduct.

7. Relationships and Power Imbalances

KWU recognises that even apparently consensual relationships may involve harmful power imbalances.

Particular caution applies where one person has authority over:

- aid access;
- funding;
- transport;
- accommodation;
- recruitment;
- referrals;
- safeguarding;
- service delivery;
- beneficiary support.

Relationships that create exploitation risk, dependency, coercion or reputational harm may be prohibited, investigated or subject to management review.

8. Children and Vulnerable Adults

KWU has zero tolerance for any sexual exploitation or abuse involving children or vulnerable adults.

Any safeguarding concern involving a child or vulnerable adult must be escalated immediately.

KWU will comply with relevant safeguarding and legal reporting obligations and maintain a separate policy for safeguarding.

9. Reporting and Complaints

Anyone (internal or external) may report concerns. Reports may relate to:

- suspected abuse;
- harassment;
- inappropriate behaviour;
- exploitation;
- attempted coercion;
- retaliation;
- online abuse;
- unsafe conduct by staff, volunteers or partners.

Reports may be made by:

- staff;
- volunteers;
- beneficiaries;
- partner organisations;
- community members;
- delegates;
- contractors;
- whistleblowers.

Anonymous reports will be considered where practical.

10. Survivor-Centred Response

KWU will seek to ensure:

- safety first;
- dignity;
- confidentiality;
- respect;
- informed choice;

- non-retaliation;
- trauma-informed handling;
- proportionate escalation;
- referral to appropriate safeguarding, legal or support services where available.

KWU will avoid unnecessary re-traumatisation.

11. Confidentiality

Information relating to SEAH and VAWG reports will only be shared on a need-to-know basis. Confidentiality may however be limited where:

- someone is at immediate risk;
- a child is involved;
- law enforcement reporting is required;
- donor or legal reporting obligations apply.

12. Investigations

All allegations will be assessed proportionately. Possible actions include:

- immediate safeguarding measures;
- suspension from duties;
- restricted access;
- internal investigation;
- referral to law enforcement;
- referral to partner safeguarding leads;
- donor notification;
- disciplinary action.

KWU will not ignore allegations because a person is senior, politically connected, influential or externally respected.

13. Partner and Third-Party Responsibility

KWU expects partners, downstream partners, contractors and delivery organisations to maintain equivalent safeguarding and SEAH standards. Where credible abuse concerns arise, KWU may:

- suspend activity;
- investigate;
- seek corrective action;
- terminate relationships;
- report to donors or authorities.

14. Training and Prevention

Where appropriate, KWU may require:

- safeguarding induction;
- SEAH awareness;
- VAWG awareness;
- trauma-informed practice;
- code of conduct training;
- reporting pathways;
- field safety awareness.

Training should be proportionate to risk and role.

15. Retaliation

Retaliation against anyone who raises a concern in good faith is prohibited. This includes:

- threats;
- exclusion;
- intimidation;
- reputational harm;
- pressure;
- dismissal;
- harassment.

Retaliation may result in disciplinary action and referral to law enforcement agencies.

16. Breach of Policy

A breach may result in:

- removal from duties;
- suspension;
- termination of employment, volunteer or partner status;
- donor reporting;
- referral to law enforcement;
- safeguarding escalation;
- permanent exclusion from KWU activity.

17. Governance and Review

The Board of Directors Advisory Council and senior leadership are responsible for ensuring this policy remains effective.

It will be reviewed annually, or after a serious incident, after major donor requirements change or after safeguarding learning.