



ACCEPTED
by the TBEC Board
on February 11, 2025

A handwritten signature in blue ink, which appears to be 'P. Sommerfeld', is written over a horizontal line.

Paul Sommerfeld,
Chair of TBEC Board

**PROTECTION FROM SEXUAL
EXPLOITATION, ABUSE AND
HARASSMENT POLICY**
OF STICHTING TB EUROPE COALITION



PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT POLICY OF STICHTING TB EUROPE COALITION

1. Policy objective

1.1. The objective of this Policy is to:

- promulgate the policy of zero tolerance for sexual exploitation, abuse and harassment (“SEAH”) for all members of governing bodies, employees, consultants and partners of Stichting TB Europe Coalition (“TBEC”);
- ensure that roles, responsibilities and expected standards of conduct in relation to SEAH are known within TBEC;
- create and maintain a safe environment, free from SEAH, by taking appropriate measures for this purpose, both internally and with regard to TBEC’s partners, as well as in the communities where TBEC operates, through robust prevention and response work.

2. Policy statement

- 2.1. SEAH violates universally recognized international legal norms and standards. Everyone has equal rights to protection from SEAH regardless of their race, gender, age, religion or disability, sexual orientation, social background or culture.
- 2.2. SEAH are unacceptable behaviors and prohibited conduct for all members of governing bodies, employees and consultants of TBEC.
- 2.3. TBEC has a policy of zero tolerance towards SEAH. All members of governing bodies, employees and consultants of TBEC are expected to uphold the highest standards of personal and professional conduct at all times, and to provide assistance in a manner that respects and fosters the rights of relevant beneficiaries and other vulnerable members of local communities.

3. Scope of application

- 3.1. This Policy sets out TBEC’s approach to prevent and respond to SEAH.
- 3.2. The Policy applies to all members of governing bodies, employees and consultants of TBEC, both on- and off-duty. The entire staff of TBEC, who have familiarized themselves with the provisions of the Policy and signed the relevant consent, is responsible for the implementation of the Policy.
- 3.3. Acknowledgment and agreement to comply with the provisions of the Policy is evidenced by the signature of the consent form for each member of governing body, employee and consultant of TBEC. Relevant form is set forth in Annex 3.
- 3.4. The Policy does not apply to SEAH regarding children if the respective activities are covered by the scope and definitions of the Child Protection Policy of TBEC. In that case, the Child Protection Policy shall apply.

4. Definitions

- 4.1. For the purposes of the present Policy, the term “**sexual exploitation**” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another person, e.g. through recruiting or coercing them to engage in sex work, producing and/or disseminating pornography, sex trafficking and profiteering from it, etc.
- 4.2. Similarly, the term “**sexual abuse**” means the actual or threatened physical intrusion of a sexual nature (vaginal, anal or oral sexual intrusion in another’s body using any body part or object), whether by force or under unequal or coercive conditions, including any sexual acts involving an adult without his/her consent or a child irrespective of his/her consent, or in presence of a

child, forcing to a sexual act with a third person, online abuse and other similar violations of sexual freedom or sexual immunity as per the applicable legislation.

- 4.3. The term “**sexual harassment**” is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation. Sexual harassment may involve any conduct of verbal (threats, bullying, obscene comments, etc.), nonverbal (sending obscene images, records, etc.) or physical (touching, patting, etc.) nature, including written and electronic communications, and may occur between persons of the same or different genders.
- 4.4. For the purposes of the present Policy, the term “**partners**” shall mean (sub)recipients of TBEC’s assistance — legal entities, including their members of governing bodies, employees, consultants and volunteers.
- 4.5. For the purposes of the present Policy, the term “**beneficiaries**” means individuals who are recipients of TBEC’s assistance and/or clients of TBEC’s projects or projects financed at the cost of TBEC’s assistance.
- 4.6. For the purposes of the present Policy, the term “**perpetrator**” shall mean any individual having committed any form of SEAH.
- 4.7. For the purposes of the present Policy, the term “**victim/survivor**” shall mean any natural person affected by any form of SEAH. The person involved should have the choice of which term to use with regard to him/her.

5. Commitment to protection against SEAH (“PSEAH”)

- 5.1. TBEC will make every effort to create and maintain a safe environment, free from SEAH, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEAH framework, including prevention and response measures.
- 5.2. This Policy affirms commitment of TBEC to the UN Secretary General’s Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core Principles relating to protection against sexual exploitation and abuse.

6. The core principles

- 6.1. SEAH by employees and consultants of TBEC constitute acts of gross misconduct or violation of civil law contract, and are therefore grounds for application of relevant disciplinary measures or sanctions under the civil law contract.
- 6.2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent established by local legislation. Mistaken belief regarding the age of a child is not a defense.
- 6.3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance or services that are due to beneficiaries.
- 6.4. Any sexual relationship between members of governing bodies, employees and consultants of TBEC and beneficiaries of assistance or other vulnerable members of the community that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of assistance and services provided by TBEC.
- 6.5. Where a TBEC’s member of a governing body, employee or consultant develops concerns or suspicions regarding SEAH by a fellow member, employee, consultant or partner of TBEC, whether within TBEC or not, he or she must report such concerns within 24 hours from the moment SEAH was revealed following a procedure established herein and providing all the information they have.



6.6. All members of governing bodies, employees and consultants of TBEC must not abuse their position and are obliged to promote and maintain an environment which prevents SEAH and promotes implementation of this Policy. Managers and employees at all levels have particular responsibilities to support and develop systems maintaining this environment.

6.7. When responding to cases of SEAH, TBEC shall act in a manner that prioritizes listening to survivors of SEAH, avoids re-traumatization, and systematically focuses on their safety, rights, well-being, expressed needs, and choices. This survivor-centered approach seeks to empower the survivor, giving them back as much control as possible, and ensuring an empathetic, respectful and individualized response in a non-judgmental manner.

The survivor-oriented approach also implies the following principles:

- *Do no harm*: no action should be taken that would worsen the situation of a survivor of SEAH.
- *Respect*: all actions taken are guided by respect for the choices, wishes, rights, and dignity of the survivor.
- *Safety*: the safety and security of the survivor is the number one priority for all actors.
- *Confidentiality*: there must be strict adherence to confidentiality regarding the survivor's identity and other identifying information in every aspect of case handling. All actions are to be taken to ensure that any matter is handled with full confidentiality.
- *Non-discrimination*: the TBEC provides equal and fair treatment to anyone in need of help due to a SEAH incident involving the TBEC personnel.
- *Protection of children*: Child survivors are to benefit from particular attention and their specific needs must be addressed. Child protection specialists are consulted regarding the care provided to children.

7. PSEAH framework

7.1. Prevention

Considering that prevention is an integral part of this Policy, TBEC responsibly approaches the issues of selection of employees and consultants, and takes measures to inform and train its members of governing bodies, employees and consultants.

7.1.1. Vetting:

Any job posting or announcement on selection of consultants includes the following:

Stichting TB Europe Coalition applies a zero tolerance policy with regard to sexual exploitation, abuse or harassment and related abuse of power or authority. It is expected that all selected candidates will adhere to the highest ethical standards and will undergo rigorous reference and background checks.



TBEC's employee selection process includes:

- probing the ethical behavior of the candidate in reference checks;
- verification of any gaps or inconsistencies in the CV or other data about the candidate. For this purpose, the form provided in Annex 1 to this Policy may be used;
- completion of a self-declaration confirming the candidate has never been subject to disciplinary, administrative or criminal sanctions arising from an investigation in relation to SEAH or related abuse of power, or left employment pending investigation and refused to cooperate in such an investigation. For this purpose, the form provided in Annex 2 to this Policy may be used.

7.1.2. *Onboarding and training:* TBEC familiarizes all of its members of governing bodies, employees, consultants, partners and beneficiaries with this Policy, including through posting this Policy on its website; conducts mandatory initial and periodic training for all personnel on this Policy and related procedures.

Staff training on PSEAH is conducted upon hiring and annually thereafter. TBEC can use existing certified programs offered by UN agencies and recognized international organizations with which TBEC has experience in partnership relations, such as the United Nations Children's Fund (UNICEF), as training for PSEAH.

7.1.3. *Safe programming:* Responsible programming is a priority for TBEC, so it will seek and support its partners as well as communities touched by TBEC's activity to evolve its programs to prevent and promptly address SEAH therein, including relevant risks assessment and sharing relevant information with the communities.

7.2. Response

7.2.1. *Reporting:* Members of governing bodies, employees, consultants, partners, beneficiaries and members of communities, including children, can safely and confidentially report SEAH. Such notification is carried out in accordance with the Procedure for reporting incidents and suspicions regarding SEAH (Annex 4 to this Policy). TBEC ensures communication of relevant contact data to members of governing bodies, employees, consultants and partners of TBEC. TBEC holds complainants safe from any prosecution by other members of governing bodies, employees, consultants and partners of TBEC in relation to the report (notification) of SEAH.

7.2.2. Procedure for consideration and investigation of SEAH cases is provided for in Annex 5 to this Policy.

7.2.3. Based on the conclusions of the investigation, a decision is made by TBEC's Chair of the Board on how to respond to the report of SEAH:

- If the report is considered not justified, and the case of violation of the Policy is not confirmed, no actions are taken.
- If the investigation leads to the conclusion that the Policy has been violated, or if the perpetrator him/herself admits the fact, the strictest disciplinary sanctions according to applicable law shall apply in case of an employee, and the contract shall be terminated in case of a consultant.
- If the investigation leads to the conclusion that the Policy has been violated by a member of the governing body, then such a governing body should be approached with an issue of termination of such person's membership.

- If the investigation substantiates the evidence that SEAH has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation has been dealt with inappropriately by a partner, then they risk withdrawal of funding or ending the relationship.
- If the confirmed cases concern donors, benefactors, patrons, volunteers or other similar individuals, cooperation with them is terminated.
- If the report indicates a criminal offence, it is then submitted to respective law enforcement bodies regardless of conclusions of the internal investigation subject there is an informed consent of the adult victim.
- If the report concerns a child, the children protection service and law enforcement bodies are notified within 24 hours regardless of the results of internal investigation.

7.3. Collaboration activities

- 7.3.1. TBEC ensures its partners and suppliers are familiar with this Policy and demands that they apply zero tolerance policy to SEAH and take actions to prevent and respond to SEAH.
- 7.3.2. Contracts with partners and suppliers of TBEC shall contain the following provision (names of the parties are subject to change depending on the type of the contract):

The Customer has zero tolerance for any sexual exploitation, abuse and harassment (SEAH) of any person. By signing this contract, the Contractor confirms having read, understood and undertaken to comply with Customer's Policy of Protection from SEAH (hereafter — the Policy), as well as making its member of governing bodies, employees, consultants and contractors read and comply with the Policy. If the investigation substantiates the evidence that SEAH has occurred, ongoing work with the Contractor cannot involve the individual(s) concerned. The Customer reserves the right to unilaterally terminate this Contract at any time, by sending a written notification of termination to the Contractor, if there is reason to believe that an allegation has been dealt with by the Contractor inappropriately, regardless of when SEAH were committed.

- 7.3.3. Failure of these legal entities or natural persons to take measures to prevent SEAH, investigate allegations of SEAH and take corrective actions in case of SEAH shall constitute the grounds for termination of any legal act (agreement, contract) with the partner.

8. **Roles and Responsibilities**

The Chair of the Board of TBEC has overall responsibility for SEAH matters at TBEC. In particular, s/he must take immediate and appropriate action upon receipt of any report or complaint about SEAH allegations, concerns or suspicions related to SEAH; raise awareness among TBEC's personnel and consultants; ensure that background checks are performed when new personnel are recruited; keeps a particular eye on projects in which staff are interacting with vulnerable populations, including children; monitors compliance with this Policy and, when necessary, reviews it.

TBEC personnel must read and understand the Policy; report any SEAH cases that they witness, heard about or suspect; and provide full cooperation with the Chair of the Board in any investigation that is instituted.

9. **Annexes:**

- Annex 1 — Feedback form about the candidate from the previous employer
- Annex 2 — Questionnaire of a candidate for filling a vacant position/providing services
- Annex 3 — Form of consent to comply with the Protection from Sexual Exploitation, Abuse and Harassment Policy
- Annex 4 — Procedure for reporting incidents and suspicions regarding SEAH
- Annex 5 — Procedure for consideration and investigation of SEAH cases
- Annex 6 — Internal report of a case of sexual exploitation, abuse or harassment
- Annex 7 — Form for documenting an incident with accusations of SEAH
- Annex 8 — Consent to participate in the investigation in the SEAH case
- Annex 9 — Statement on compliance with the confidentiality of persons who are not participants in the investigation or investigators
- Annex 10 — Obligation of confidentiality of the investigator (member of the investigation commission)
- Annex 11 — Referral form



Annex 1

To Protection from Sexual Exploration, Abuse and Harassment Policy

Feedback form about the candidate from the previous employer

Stichting TB Europe Coalition conducts this check to promote absolute (zero) tolerance to sexual exploitation, abuse and harassment for all employees, consultants and partners of TBEC, to create and maintain a safe environment free from sexual exploitation, abuse and harassment, as well as improving the prevention of any forms of abuse.

** Required for filling in*

Your name: *

Name of your organization and position: *

Email address and phone number: *

Name of the candidate: *

Your business position in relation to the candidate (manager, colleague, business partner, consultant): *

How long have you worked with the candidate and in which organization? *

We appreciate your honest feedback. Please answer the questions briefly. If possible, please provide specific examples.

1. Briefly describe the main job duties of the candidate when you worked with him/her: *
2. Describe what achievements and/or contributions the candidate has made to your organization: *
3. Has s/he been in an environment where s/he has had the opportunity to work with team members and partners from different cultures, languages, perspectives, etc.? Describe her/his ability to communicate with others: *
4. In your opinion, what professional skills and competencies of the candidate need to be worked on? How do you see him/her trying to improve them? *
5. Do you have any concerns about this candidate's ability to maintain a safe work environment free of sexual exploitation, abuse or harassment? *
6. Do you know of any cases where the candidate violated the rules and internal policies of the organization? If so, what violations took place? *
7. Do you have any additional comments or reservations about the candidate's work or ethical conduct? *
8. Would you hire him/her again? *



Annex 3

To Protection from Sexual Exploration, Abuse and Harassment Policy

Form of consent to comply with the Protection from Sexual Exploitation, Abuse and Harassment Policy

in Stichting TB Europe Coalition TBEC

I, _____, confirm with my signature that I have familiarized myself with the provisions of the Protection from Sexual Exploitation, Abuse and Harassment Policy of TBEC (the 'Policy'), have understood all the principles and requirements, and confirm my commitment to the policy of zero tolerance for sexual exploitation, abuse and harassment ('SEAH') and my readiness to act in full accordance with the requirements of the Policy.

I also guarantee with my signature the truthfulness of the data provided by me during the selection for cooperation with TBEC regarding the absence of any cases of SEAH in the past where I could act as a perpetrator.

I am aware of the full extent of responsibility for violating the provisions of the Policy, including administrative and criminal responsibility, in accordance with the applicable legislation.

I have had the opportunity to ask all questions regarding the provisions of the Policy and receive comprehensive answers from the authorized person before signing this Form.

Full name and role of signatory: _____ Signature: _____

Name of the authorized person of TBEC: _____ Signature: _____

Date: _____



Annex 4

To Protection from Sexual Exploitation, Abuse and Harassment Policy

Procedure for reporting incidents and suspicions regarding SEAH

1. Notification of an incident or suspicion of sexual exploitation, abuse and harassment ('SEAH') can be submitted by members of governing bodies, staff, consultants, partners or any other victims of SEAH or witnesses to the incident.
2. In the event of incidents or suspicions of SEAH, the relevant person is obliged to immediately, in an arbitrary form or in the form of an internal report as provided in Annex 6 to the Policy, notify the Chair of the Board. If the notification concerns the Chair of the Board, the report should be addressed to the Executive Director who then takes all actions and decisions conferred on the Chair of the Board according to the Policy.
3. The report must be detailed and include information about facts or suspicions regarding the case of SEAH, information about the survivor, the perpetrator and witnesses, including their personal data.
4. All cases and/or suspicions of SEAH, including anonymous ones, are treated individually and confidentially, in accordance with TBEC's Protection from Sexual Exploitation, Abuse and Harassment Policy and its Procedure for consideration and investigation of SEAH cases (Annex 5 to the Policy).
5. TBEC creates, maintains and disseminates information about the availability of channels for receiving notifications (reports): email address (coordinator@tbcoalition.eu).
6. The Chair of the Board constantly checks the presence of notifications (reports) and records all received notifications (reports), including anonymous ones, in a separate log file saved at a secured folder located on TBEC's server.
7. The corresponding log file must be protected by a password known only to the Chair of the Board.
8. The Chair of the Board carries out an initial evaluation of the notification (report).
9. In the case of detection of the facts of SEAH, the Chair of the Board, if required by a donor, must send a corresponding notification (report) about the incident to the donor's email address.

Annex 5

To Protection from Sexual Exploration, Abuse and Harassment Policy

Procedure for consideration and investigation of SEAH cases

The procedure is applied to consider internal, external, anonymous notifications (reports) according to a single algorithm, namely:

1. No later than 72 hours from the moment of receiving the notification (report), the Chair of the Board must consider the notification (report) and contact the survivor to confirm its receipt.
2. Within 72 hours after confirmation of the fact of receiving a notification (report) of SEAH, the information is evaluated, taking into account an individual, confidential approach to the needs of the survivor. Necessary qualified specialists can be involved to provide assistance to the survivor.
3. The Chair of the Board must direct suspicious and substantiated SEAH cases and cases involving minor children and vulnerable adults, in accordance with the applicable legislation.
4. The Chair of the Board performs an initial evaluation of the notification (report).
5. The Chair of the Board may, if necessary, initiate the formation of a temporary commission (group) consisting of at least three persons for the administrative investigation of the case for further consideration of the received notification (report) about the SEAH case. The investigation commission may include the Chair of the Board, TBEC's staff, representatives of TBEC's member organization, the donor organization, as well as independent experts. Persons to whom the notification (report) relates cannot be members of the commission.
6. The commission (group) analyses the information received during the investigation and prepares conclusions regarding the confirmation or disconfirmation of the facts of the SEAH. The investigation may last up to three months.
7. For a comprehensive assessment of the situation, the Chair of the Board or the commission (group) must receive in writing the testimony of other persons who may have been affected by the SEAH case or who may have become witnesses, as well as the perpetrator's explanation. As part of the investigation, interviews of the persons who made the notification (report), the survivor, witnesses and subjects of the investigation may also be conducted, which are necessary to clarify the circumstances. Persons involved in this way sign an informed consent to participate in the investigation (Annex 8 to the Policy).
8. The conclusions of the investigation commission are considered by the Chair of the Board who then decides on application of necessary sanctions, guided by TBEC's Protection from Sexual Exploitation, Abuse and Harassment Policy and having objectively and impartially considered all available facts.
9. The survivor has the right to receive information about the progress of the investigation procedure.
10. The Chair of the Board must inform the informant, the perpetrator and the survivor about the relevant decision.
11. The case is documented by the Chair of the Board in the relevant log file saved at a secured folder located on TBEC's server in order provided for in Annex 7 to the Policy.
12. Confidentiality. Personal data of persons who make a notification (report) or are involved in an investigation are treated as strictly confidential. All members of the commission, participants in the investigation and other persons involved in the consideration of the notification (report) must observe the principle of confidentiality during the entire process of submission and consideration thereof, as well as afterwards. All persons involved in the review of the notification



(report) sign the appropriate statement on compliance with confidentiality (Annexes 9 and 10 to the Policy). In case of breach of confidentiality, such persons will be subject to disciplinary or contractual penalties, or other liability measures in accordance with the applicable legislation. Confidential information received by the Chair of the Board during the consideration of the case may not be transferred to other persons, unless it is provided for by law.



Annex 6

To Protection from Sexual Exploration, Abuse and Harassment Policy

Internal report about a case of sexual exploitation, abuse or harassment

Reason for reporting the case:

- I witnessed a case of sexual exploitation, abuse and harassment ('SEAH')
- I have a reasonable suspicion that the person is involved in SEAH
- I became a survivor of SEAH

Please provide the facts that support your concern. If possible, specify the date, time, place and circumstances of the incident:

If you are a survivor of SEAH, what urgent assistance do you need?

- I need medical assistance.
- I need psychological support and rehabilitation.
- I am looking for legal assistance to bring the guilty person to justice.
- I need financial assistance to cope with the consequences of SEAH.

Other (specify):



Annex 7

To Protection from Sexual Exploration, Abuse and Harassment Policy

Form for documenting an incident with accusations of sexual exploitation, abuse or harassment

CONFIDENTIALLY:

access to this document is limited and this document is kept separately from other documents related to the SEAH incident.

1. Detailed information about how, when and by whom the accusation was received:
2. Description of the alleged incident, including dates, time and place:
3. Description of intended or expected survivors (for example, full name, age, gender, ethnic origin / nationality, disability):
4. Description of alleged or suspected perpetrators (for example, full name, age, gender, nationality, organizational affiliation / position, previous records of wrongdoing):
5. Activities undertaken by TBEC in response to allegations received to date (e.g. referral for assistance, investigations, reporting to third parties):
6. Activities carried out by other organizations or entities in response to this accusation:
7. Requested support from partners (for example, providing support to survivors of SEAH, support during investigations):
8. Information about the persons to whom this report was sent (name, position, contact information (e-mail, phone), date):

The report was prepared by:

Name _____

Position _____

Date _____



Annex 8

To Protection from Sexual Exploration, Abuse and Harassment Policy

Consent to participate in the investigation in the SEAH case

You have been asked to assist in the investigation of an allegation of sexual exploitation, abuse or harassment ('SEAH') conducted by TBEC. You may be asked to undergo an interview, provide documents, computer files and other records, or be asked to provide assistance in any other way. Internal investigations are a core element of TBEC's commitment to preventing and responding to SEAH.

As a participant in the investigation, you must know and agree to the following.

Cooperation. You are requested to cooperate with the investigation and answer honestly and fully to all questions and requests of the relevant commission.

Compliance with confidentiality. You must keep confidential the fact that an investigation is underway and that anything was discussed with you as part of the investigation, as well as any details of such discussion.

Renunciation of retaliation. TBEC does not accept any threats or retaliation against those who report a violation or cooperate with an investigation.

Abandoning your investigation. Do not attempt to conduct your own investigation or subpoena witnesses, as this may disrupt the course of the investigation.

Creation of favorable conditions. Never try to interfere or obstruct the investigation.

Compliance with these requirements is mandatory. Violations may result in severe disciplinary action and referral to law enforcement. Thank you very much for helping TBEC in conducting the investigation. If you learn or remember anything else that may be relevant to the investigation, or if you have any questions, please contact us.

Name and contact details of TBEC'S authorized person: _____

Signature of TBEC's authorized person: _____

I agree to participate in the investigation and comply with the conditions of such investigation specified in this consent.

Name and signature of the investigation participant: _____



Annex 9

To Protection from Sexual Exploration, Abuse and Harassment Policy

Statement on compliance with the confidentiality of persons who are not participants in the investigation or investigators

Purpose: Confidentiality is an important component of the survivor-centered approach in investigations of sexual exploitation, abuse or harassment ('SEAH') and ensures that information collected during the investigation is shared only with authorized recipients on a need-to-know basis. Therefore, the "Confidentiality Statement" instrument applies to all interpreters, survivors' representatives, providers of support, and all persons who are not participants in the investigation and are not part of the main group (commission) conducting the investigation.

How to use this instrument: Interpreters, survivors' representatives, providers of support, and any other person who is not a participant in the investigation and who is not part of the core investigation group (commission) must read and sign the Confidentiality Statement in the presence of an investigator (commission member or the authorized person of TBEC) before participating in interviews, sessions or information exchange. The investigator also signs the statement, ensuring that it is properly filed and kept with other investigative documentation. If the investigation is conducted remotely, ideally the statement should be signed in the presence of a member of the investigation group (commission). If this is not possible, the statement must be signed by video conference in the presence of the investigator.

Confidentiality Statement

I, the undersigned _____, undertake to exercise the utmost caution regarding my participation in the investigation conducted by Stichting TB Europe Coalition.

I undertake to maintain the confidentiality of all information that has become known to me as a result of my activities within the framework of the specified investigation. I will not use such information for my personal gain, nor for the benefit or detriment of any third parties. I understand that this statement will remain in effect after my investigative assignment is complete. I also understand that disclosure of confidential information to persons not authorized to receive it may constitute misconduct and that a signed original of this statement will be kept in the appropriate investigative file.

Name: _____

Position: _____

Signature: _____

Date and place: _____



Annex 10

To Protection from Sexual Exploration, Abuse and Harassment Policy

Obligation of confidentiality of the investigator (member of the investigation commission)

It is extremely important to respond to allegations of sexual exploitation, abuse or harassment ('SEAH') in a safe and independent manner. To this end, it is important to ensure respect for the privacy/confidentiality of those involved in the report consideration.

Each investigator who has personally identifiable information must not share this information except with the group responsible for managing the investigation (members of the relevant commission and the authorized person) and/or decision-makers at TBEC.

Any breach of privacy can have serious consequences for

- (i) the alleged survivor,
- (ii) the informant, witnesses or alleged perpetrator,
- (iii) and for the credibility and safety of the investigative group.

In connection with this obligation, confidential information is:

- ✓ Direct or indirect information related to the notification (report) and/or investigation
- ✓ Documentary evidence (report forms, emails, interview reports, handwritten notes, recordings, etc.)
- ✓ Information related to the investigation group's investigation priorities and planning.

I, _____, am authorized as an investigator to conduct an investigation into a SEAH report on behalf of TBEC. I undertake to professionally perform the tasks assigned to me. I agree to perform the necessary actions in full and conscientiously, to the best of my ability.

I understand that all information provided by witnesses and the informant or any other party involved in the investigation is strictly confidential.

I will respect the right to privacy of everyone involved in this case.

I will always seek the consent of survivors to share their personal information with decision-makers in the case and ensure that they are familiar with TBEC's case management procedures.

I will not discuss, directly or indirectly, any information related to the case with anyone outside the investigation group without written permission from TBEC.

I also agree to keep all documentary evidence securely in accordance with TBEC's instructions, keeping physical copies in a locked location and electronic copies in a password-secured location.

I agree not to make copies of evidence unnecessarily and to destroy all electronic and physical copies remaining in my possession after my participation in the investigation is complete.

If I am required to provide law enforcement with information related to an investigation, I will immediately notify TBEC in writing.



I understand that this obligation remains in effect even after the investigation is complete and that disclosure of confidential information at any time may result in prosecution and disciplinary or other action by my employer and/or TBEC.

Signature of the investigator

Date



Annex 11

To Protection from Sexual Exploration, Abuse and Harassment Policy

Referral Form

CONFIDENTIAL: Please restrict access to this document and keep it stored safely.

Note: Please share copies of filled out referral forms with the survivor and receiving agency and keep a copy for the organization's internal records and follow-up.

Referring agency	
Agency/org:	Contact:
Phone:	Email:
Location	

Receiving agency	
Agency/org:	Contact:
Phone:	Email:
Location	

Survivor information	
Name:	Phone:
Address:	Age:
Sex	Nationality:
Language:	ID number
If survivor is a minor (under 18)	
Name of primary caregiver:	Relationship to child:
Contact information for caregiver:	Is child separated or unaccompanied? Yes No
Caregiver is informed about referral? Yes No (If no, explain)	



Background Information/Reason for referral and services already provided

Has the survivor been informed of the referral?

Yes No (If no, explain below)

Has the survivor been referred to any other organization?

Yes No (If yes, explain below)

Services requested

Mental Health Services Psychosocial Support Social Services Medical Care

Protection Services Legal Assistance Education Livelihood Support

Shelter
Material Assistance Nutrition
Support for children born as a result of SEA

Please explain any requested services:

Consent to release information. (Read with survivor/ caregiver and answer any questions before s/he signs below. Sign on behalf of survivor/caregiver if consent is given verbally and survivor/caregiver cannot sign.)

I, _____ **(survivor name)**, understand that the purpose of the referral and of disclosing this information to _____ **(name of receiving agency)** is to ensure the safety and continuity of care among service providers seeking to serve the client. The service provider, _____ **(name of referring agency)**, has clearly explained the procedure of the referral to me and has listed the exact information that is to be disclosed. By signing this form, I authorize this exchange of information.

Signature of responsible party (survivor or caregiver if a child):

Date (DD/MM/YY):



Details of Referral

Any contact or other restrictions? Yes No (If yes, please explain below)

Referral delivered via: Phone (emergency only) E-mail Electronically (e.g., App or database) In Person

Follow-up expected via: Phone E-mail In Person. By date (DD/MM/YY):

Information agencies agree to exchange in follow up:

Name and signature of recipient: _____

Date received (DD/MM/YY): _____