

Ukraine crisis: increased risk of sexual exploitation and abuse and sexual harassment

The situation in Ukraine continues to change rapidly, with many Ukrainians becoming displaced and seeking the shelter and safety of charities operating along Ukraine's borders and in the neighbouring countries.

We recognise the vital work charities are delivering, here and in the region, to support those affected by the crisis. Through our collaboration with the Foreign Commonwealth and Development Office (FCDO), we are aware that criminal groups are operating in the region. Charities need to be alert to the risks that some individuals may try to use the cover of charity for the purpose of sexual exploitation and abuse and sexual harassment of those in need of assistance.

All trustees must take reasonable steps to protect from harm people who come into contact with their charity – this is a fundamental part of fulfilling your trustee duties and operating as a charity for the public benefit. However, operating internationally in response to a humanitarian crisis will pose particular safeguarding challenges and we recognise that those fleeing from conflict will have experienced significant trauma, which may result in specific vulnerabilities.

Whilst the risks faced, and how these are managed, will depend on the size, nature and complexity of the charity, trustees should consider what further steps they could take to ensure they are keeping people safe from harm.

We expect trustees of charities operating in the region to:

- assess and manage sexual exploitation and abuse and sexual harassment risks and wider safeguarding risks in their charity and for its operations
- regularly review existing safeguarding policies and procedures to ensure that they remain fit for purpose as the situation on the ground evolves
- make sure trustees, staff and volunteers are suitable and legally able to act in their positions, [undertaking or updating vetting checks as appropriate](#)
- implement any training plans, especially following new recruitment
- use the [Misconduct Disclosure Scheme](#) if they are signatories when hiring staff and volunteers to help protect their charity and other organisations from individuals who pose a safeguarding risk – for those who are not currently signatories, you should apply the principles of the scheme and then sign up to it as soon as feasible
- ensure all those connected to their charity understand how, and feel able, to report concerns

If your charity is responding to the crisis in Ukraine by working with

partners, you must make sure that any grant recipient or partner body is suitable and they must have appropriate safeguarding procedures in place. Where a registered charity supports, or works closely with overseas partners or not-for-profit organisations that are not registered with the Commission, we will hold the registered charity to account over the suitability and management of that relationship – including its supervision of safeguarding risks.

For more information on conducting appropriate and proper due diligence, please [see our Compliance Toolkit](#) which includes a range of practical tools. For specific due diligence guidance on safeguarding against sexual exploitation and abuse and sexual harassment, charities may also wish to consider FCDO's framework for implementing partners.

Handling allegations or incidents

Where allegations or incidents do arise, it is important that charities respond quickly and handle the situation appropriately. Charities should ensure that support is available to victims and survivors. They must also report to all relevant agencies and regulators as appropriate.

This includes [reporting to the Charity Commission where serious incidents occur](#) and reporting potentially criminal incidents to the police and/or appropriate authorities in the locality.

In cases where a British national or a person with a claim to UK residency has committed, or potentially committed, a child sexual abuse/exploitation offence overseas, the UK authorities may have an interest even though it happened overseas. Please see our guidance on [reporting to the police](#) for more information.

Further information

For more information on sexual exploitation and abuse and sexual harassment, please see:

The Commission also has further information on protecting people who come into contact with your charity:

For guidance on responding to the crisis in Ukraine, please see the Commission's main hub – [Ukraine humanitarian crisis: guidance for charities and trustees](#).

Notes

The Charity Commission, the independent regulator of charities in England and Wales, is issuing this alert to charities as regulatory advice under section 15(2) of the Charities Act 2011.