RESEARCH ON BARRIERS TO SEA REPORTING

July 2025

care® itar PLAN INTERNATIONAL INTERNATIONAL RESCUE COMMITTEE

TABLE OF CONTENTS

Acronyms

AAP	Accountability to Affected Populations
EU	European Union
FGD	Focus Group Discussions
GBV	Gender-Based Violence
HNO	Humanitarian Needs Overview
IARA	Inter-Agency Risk Assessment
IDP	Internally Displaced Person
IASC	Inter-Agency Standing Committee
INGO	International Non-Governmental Organisation
IPV	Intimate Partner Violence
IRC	International Rescue Committee
KII	Key Informant Interview
MEAL	Monitoring Evaluation Accountability and Learning
MERL	Monitoring, Evaluation, Research and Learning
MDS	Misconduct Disclosure Scheme
NIK	Supreme Audit Office (Najwyższa Izba Kontroli)
NGO	Non-Governmental NGO
PSEA	Protection from Sexual Exploitation and Abuse
SEA	Sexual Exploitation and Abuse
SEAH	Sexual Exploitation, Abuse and Harassment
SOP	Standard Operating Procedure
ToRs	Terms of Reference

Glossary

This report refers to some technical terms, defined and understood as described below.

GBV

Gender-Based Violence (GBV) refers to any harmful act perpetrated against an individual's will, often based on socially ascribed differences between men and women. Structural and systemic gender inequality contributes significantly to GBV prevalence.

Safeguarding

Safeguarding includes SEA (see below) but is broader. It refers to measures taken by organisations to prevent, report, and respond to harm or abuse and to keep programme participants and service users safe and protected from SEA(H) and from any other forms of harm. This includes harm caused by staff members or associates, or by the organisation's operations or activities.

SEA

Sexual Exploitation and Abuse (SEA) encompasses sexual exploitation and abuse within development and humanitarian organisations and Peacekeeping Missions. It primarily occurs within work-related / service provision environments and is rooted in power dynamics and inequalities. In some cases, Sexual Exploitation, Abuse and Harassment (SEAH) might be used to also encompass sexual harassment. This is not the case in this report, although several stakeholders consulted used the term SEA to refer to sexual exploitation, abuse and harassment – or even, wider safeguarding concerns in some instances. It will be made explicit when that is the case.

The Inter-Agency Standing Committee (IASC) defines these behaviours as follows:[1]

- Sexual exploitation: "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."

- Sexual abuse: "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions."

Sexual harassment

Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature. It is also any other behaviour of a sexual nature that might reasonably be expected, or be perceived, to cause offence or humiliation to another person, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident.

This study focused specifically on SEA, but several stakeholders consulted also reflected on and discussed sexual harassment.

Protection

Protection encompasses all activities aimed at ensuring the full respect of individual rights, in line with relevant laws, including human rights law, international humanitarian law, and refugee law. Such activities can be responsive, remedial, or preventive.

Protection is different from safeguarding as it refers specifically to activities implemented by an organisation to prevent harm and abuse taking place within families and communities. Safeguarding complements it by focusing on potential harm caused by an organisation, its employees or associates.

[1] IASC. The essential linkages between Accountability to Affected Populations (AAP) and Preventions of Sexual Exploitation and Abuse (PSEA).

Document overview

A consortium formed by CARE, the International Rescue Committee (IRC) and Plan International commissioned ITAR Consultants to conduct a study in order to identify barriers to reporting of Sexual Exploitation, and Abuse (SEA) among refugees from Ukraine in Poland.

This document is the final report, which presents an assessment of the study results, with an overview of the study, methodology adopted and contextual analysis, followed by a presentation of results and recommendations.

It is structured as follows:

- **Study overview:** presenting the objectives of this study, the research questions and methodology adopted, including limitations;
- **Context analysis:** with a presentation of the context for the study, based on a desk review and consultations with experts and representatives from humanitarian organisations;
- **Community perceptions of SEA and misconduct:** outlining perceptions of SEA and misconduct risks as secondary compared to priority needs among refugee communities, investigating the factors influencing this perception, and exploring how to ensure safe and accessible reporting;
- **SEA priorities for the humanitarian sector:** considering perceptions of power imbalances among humanitarian sector stakeholders and how they influence attitudes to SEA, as well as summarising identified priorities in SEA for the Polish humanitarian sector to consider in light of gaps identified; and finally
- **Recommendations:** a list of recommendations by type of stakeholders.

This report is available in Polish. An executive summary is also available in English, Polish and Ukrainian.

1 Study overview

1.1. Study relevance

Sexual Exploitation and Abuse (SEA), along with other forms of abuse, have a long history of occurring in settings where vulnerable individuals travel, reside or receive services. Yet, estimates of SEA survivors are understated. As with other forms of sexual abuse, this is partly because large studies do not consider the most vulnerable populations (e.g., homeless people, people living in shelters, closed or residential care facilities), and partly due to underreporting.[2]

In recent years, local and international humanitarian agencies have grown more aware of the risks of SEA and other misconduct in their operations and have taken steps to address these risks. However, challenges remain. Addressing them relies on sharing good practices within the humanitarian community and gaining a better understanding of specific contexts where organisations serve vulnerable individuals, including refugees, Internally Displaced Persons (IDPs) and local communities. This in turn can support international actors to improve and adapt their practices, support the identification of advocacy needs in a given context, and support local actors to improve practices.

Since the beginning of Russia's full-scale invasion of Ukraine, risks of violence, exploitation and abuse along the displacement journey of Ukrainians have been highlighted within Ukraine and in neighbouring counties, including Poland. Research has shown that populations from Ukraine, mainly women and children, have endured continued experiences and risks of violence in the conflict, during transit and in places where they have sought refuge. Forms of violence include sexual violence, structural, physical, verbal, emotional and economic violence, along with heightened risks of exploitation.[3]

[2] Care of the Adult Patient after Sexual Assault (2011). Linden, J. A. M.D. N Engl J Med 2011;365:834-841

[3] "Not a single safe place": The Ukrainian refugees at risk: violence, trafficking and exploitation. Findings from Poland and Ukraine (2022). Rertek, S., Kuznetsova, I. and Kot, M. Research Report. University of Birmingham.

Poland hosts approximately one million Ukrainian citizens seeking international protection, primarily consisting of women, children, and older individuals, with women making up 63% of the refugee population.[4] They are particularly vulnerable to gender-based violence (GBV) due to their displacement and the upheaval caused by the war. While temporary protection measures have allowed access to essential services and employment opportunities, numerous barriers, such as language difficulties, economic instability, and social stigma, worsen their vulnerabilities and prevent effective prevention, reporting and response to SEA incidents. Challenges faced by refugees are compounded by existing policy and service gaps in Poland, despite some efforts towards improved safeguarding measures.

High risks of SEA were identified from the outset of emergency response to displacement in Ukraine and neighbouring countries. This led to the gradual implementation of mechanisms to mitigate safeguarding risks, including PSEA measures targeting prevention, reporting and investigation, across the humanitarian sector. Yet, there is limited reporting of SEA or any other type of misconduct from staff or aid recipients in Poland, which practitioners across the humanitarian sector recognise is not a positive indicator. As stated in a 2022 edition of the Humanitarian Exchange: “we no longer make the mistake of assuming that no reports means everything is fine.”[5]

As Poland continues to host a significant number of refugees, predominantly women and children, there is an urgent need to understand and address the vulnerabilities they face – whether they have just arrived or been in Poland for a few years. In addition to risks encountered on the move and upon arrival, recent reporting highlights protection risks linked to accommodation, labour exploitation, and access to essential services, including housing, financial support, education, health and mental health support. Increasing hate and discrimination towards refugees is also reported in the current complex political environment.[6]

This report focuses on one of the main challenges, underreporting in Poland, trying to decode what specific measures can be undertaken in this and similar contexts. In 2024, a consortium formed by CARE, the International Rescue Committee (IRC) and Plan International commissioned ITAR Consultants to conduct **a study to identify barriers to reporting of Sexual Exploitation, and Abuse (SEA) among refugees from Ukraine in Poland.**

[4] Regional Refugee Response for the Ukraine Situation (2024). UNHCR
[5] Protection from sexual exploitation and abuse and sexual harassment in humanitarian action (2022). Humanitarian Exchange. Number 81 June 2022.
[6] Protection Monitoring Report Poland Q2 (April - June 2024). IRC.

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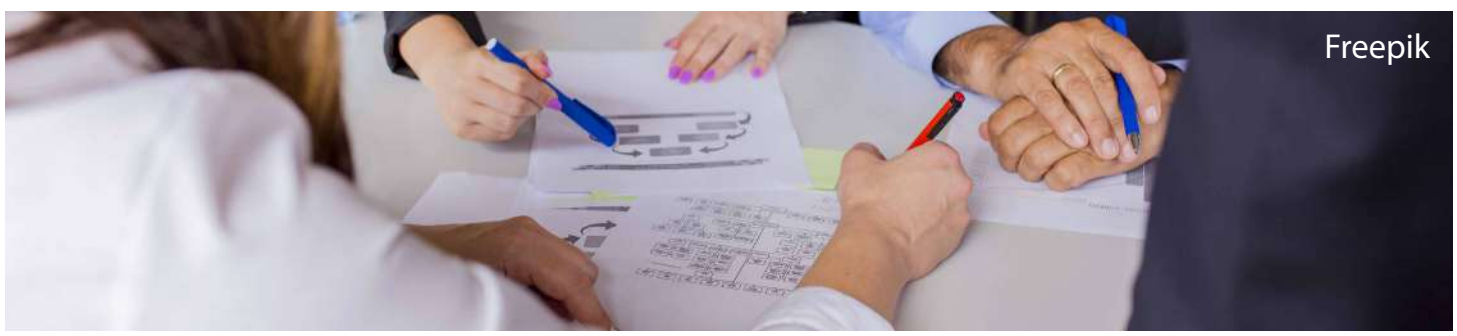
1.2. Study objectives

The primary aim of the study was to understand perceptions and reasons for underreporting SEA and further provide recommendations for CARE, IRC, Plan International and all actors providing services to refugee communities in Poland to promote social and behavioural change. It is expected that the study will inform future advocacy efforts, programming and organisational practices for safeguarding.

Following initial meetings with the consortium and scoping interviews, the study focus was broadened to perceptions from both humanitarian workers and aid recipients regarding the concepts underpinning SEA, including how power imbalances at play in the emergency response might influence attitudes towards reporting. The decision to also explore perception of power imbalances is grounded in the recognised need to raise awareness on how different understandings of power and veiled imbalances are correlated with abuse, including sexual abuse. With a focus on the specific context of the Polish response to the war in Ukraine, the study seeks to uncover any evolution regarding attitudes and practices among humanitarian organisations supporting refugees.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To achieve these objectives, the following research questions guided the study:

1. How do Ukrainian refugees in Poland understand, define, and identify SEA cases? How are concepts underpinning SEA perceived and what are factors influencing these perceptions?

2. What is the level of understanding and attitude towards the existing SEA reporting and response mechanisms among Ukrainian refugees in Poland and local communities hosting refugees?

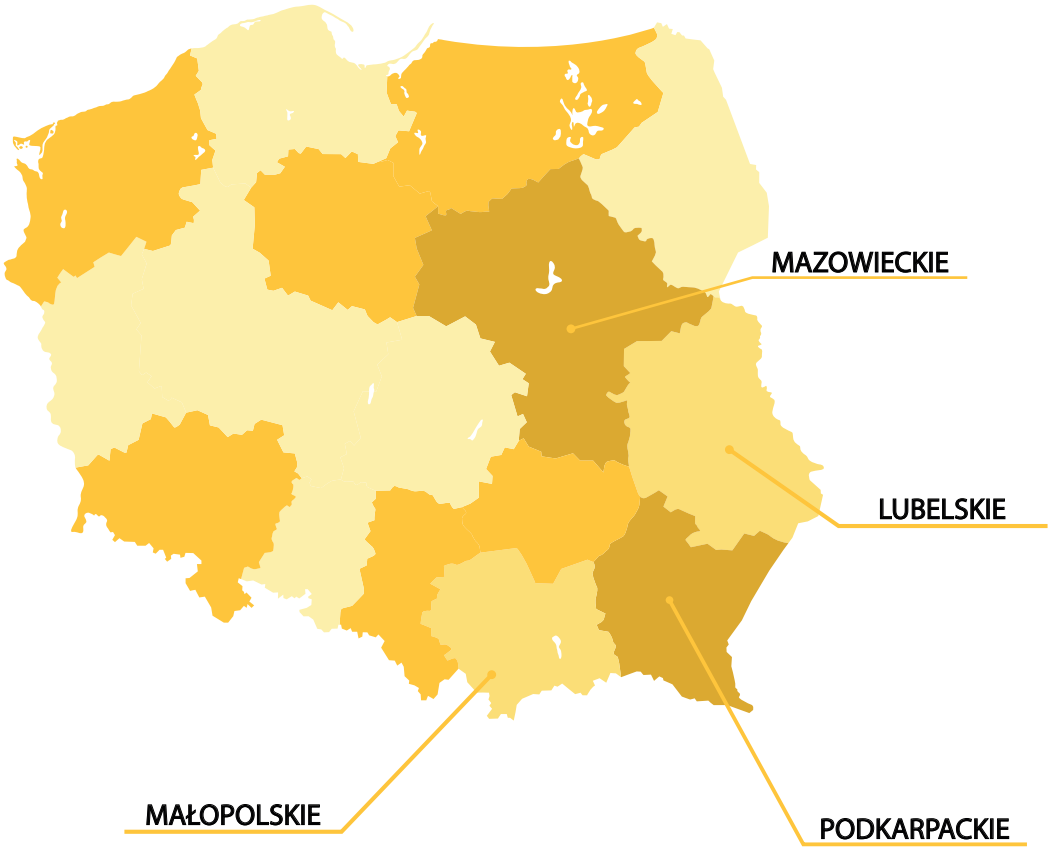
3. What are Ukrainian refugees' preferred ways to receive communication about SEA and channels to raise concerns?

4. What factors influence trust and a sense of accountability among refugees and affected populations, and specifically, what are their expectations around SEA reporting and response procedures?

5. How do organisations providing services to Ukrainian refugees in Poland (1) ensure effectiveness of internal systems for managing GBV and SEA cases, (2) support staff to recognise, report and elevate cases of GBV or SEA, and (3) take steps to prevent acts of SEA at organisational and collective levels?

6. How to foster collaboration between CSO(s) and public sector service providers in terms of strengthening accountability to crisis affected populations?

7. What evidence and good practices from similar contexts can be used to further develop and strengthen safeguarding framework in Poland?



1.3. Approach

This study is based on a broad range of sources, including civil society reports and academic journals, country reports, Polish legislation, and international humanitarian standards. A full bibliography is provided at the end of the report.

The core of our data comes from the fieldwork carried out between February and May 2025, including interviews with key informants, an online survey among humanitarian staff, and an in-person survey in the following vovoideships (regions): Podkarpackie, Masovian, Lesser Poland, and Lubelskie. These voivodships were selected for consultations because of the high representation of refugee population.

Our researchers visited collective accommodation centres, migrant integration centres, civil society organisations, and other places where refugees from Ukraine receive aid. Interviewees were selected through snowball and purposeful sampling a recruitment technique whereby research participants are chosen based on specific characteristics relevant to the research and suggested by experts in the area. In parallel, they also consulted lawyers and experts from civil society organisations, staff members from UN agencies, national and international humanitarian NGOs, and PSEA networks representatives. In total, the team conducted:

- 294 surveys among aid recipients;
- 15 Key Informant Interviews (KIIs) with experts and humanitarian staff;
- validation workshops with humanitarian staff and with aid recipients to further contextualise and discuss the results; and
- an online survey focusing on organisational practices and distributed among 60 humanitarian organisations in Poland, though completed only by 10.

The methodology adopted and data collection tools were validated by Plan International's ethical review committee, to ensure they were rooted in a do not harm approach, based on robust ethical and safeguarding considerations. A detailed overview of the methodology is available in annexe of this report. All insights from consultations have been anonymised.

The purpose of the study was to promote a safe environment in which staff and aid recipients could talk about what is being done in the humanitarian sector to detect, prevent, mitigate and report misconduct and where significant gaps or challenges remain.

Yet, the study did not attempt to collect data on the extent or impact of SEA. It is also important to emphasise that this study was limited to consultations with experts, humanitarian staff and recipients of humanitarian assistance. It did not include interviews with Polish governmental authorities, law enforcement agencies and other public institutions. Other limitations included selections biases among consulted practitioners and aid recipients and the relatively low response rate for the online survey targeting humanitarian organisations, then finally the relatively small and self-selecting sample size.

The analysis provided throughout this report takes these limitations into account, reflecting that stakeholder perceptions are not statistically representative of all humanitarian practitioners and organisations active in Poland. Similarly, perceptions shared by aid recipients are not representative of all refugees who have accessed humanitarian support in Poland as many may not or no longer live in shelters. The analysis also takes this into account. Given that aid recipients currently living in shelters are among the most vulnerable population of aid recipients in Poland today, their responses provide an essential insight into SEA perceptions among these vulnerable groups.

As noted under the Glossary on p4, please note that the study, and therefore consultations among aid recipients and practitioners, focused specifically on SEA. Yet, consultations with practitioners led to reflections on sexual harassment too, often understood to fall under the scope of SEA. The analysis therefore also reflects some of these insights.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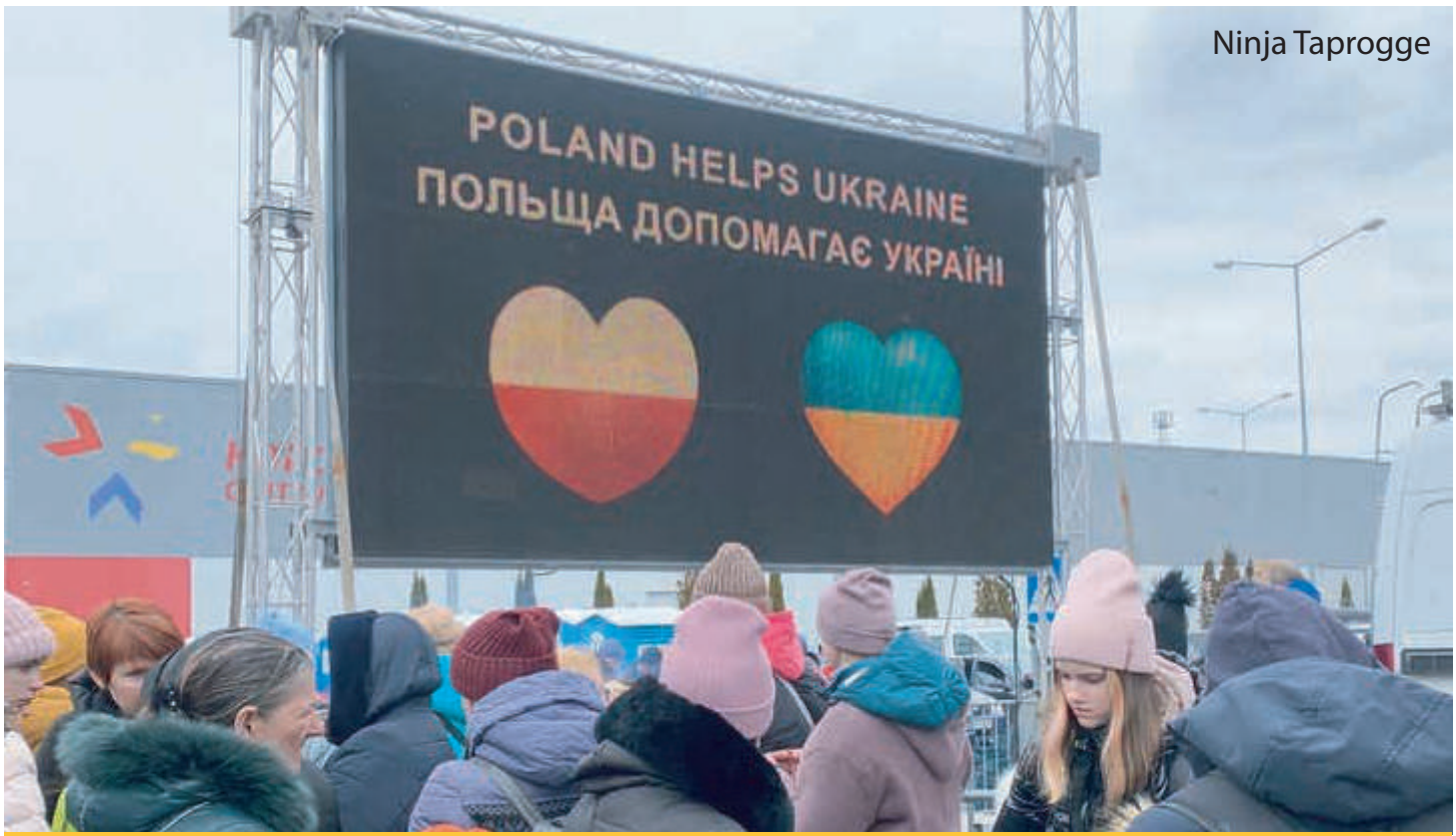
2 Context analysis



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2.1. Understanding the framework to address SEA in Poland

The Polish legal framework globally aligns with European standards but faces challenges in implementation

Poland has implemented several legal frameworks to prevent and address sexual violence, exploitation and abuse, partly governed by international treaties and regulations of organisations that Poland belongs to.

This includes notably the European Union and the Council of Europe:

- At the EU level, binding directives that Member States have to follow include: (1) several Gender Equality directives preventing discrimination and prohibiting sexual harassment in the workplace (006/54/EC; 2004/113/EC; 2010/41/EU), (2) the Anti-trafficking Directive (2011/36/EU) addressing criminalising for the purposes of sexual exploitation, (3) the Victim's Rights directive (2012/29/EU), with an obligation to provide confidential support and protect survivors of crimes (including GBV and SEA), and (4) the EU Whistleblowing Directive (2019/1937) protecting whistleblower employees who report unlawful behaviour.
- Poland ratified the Council of Europe Convention on preventing and combating violence against women and domestic violence, commonly known as the Istanbul Convention, in 2015. This international treaty mandates signatory countries to implement measures aimed at preventing violence, protecting victims, and prosecuting perpetrators.

Polish law reflects these frameworks through different acts, in the Penal Code and in the Labour Code.

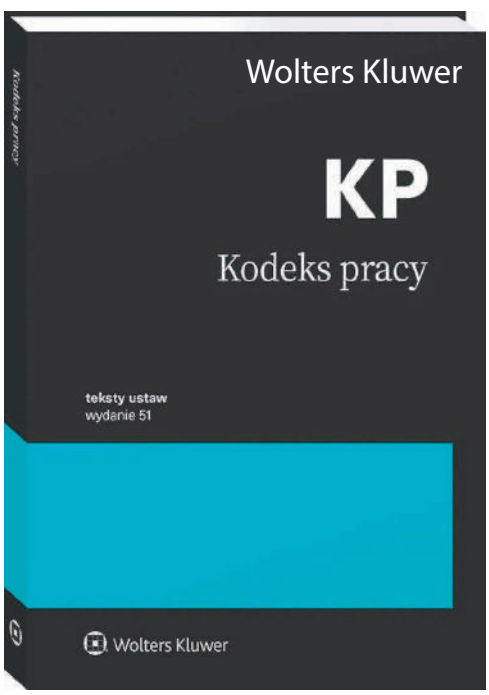
The Polish Penal Code criminalises rape, sexual abuse, sexual harassment and other forms of sexual misconduct – with provisions for abuse of dependents or those in vulnerable positions.

The definition of rape (Article 197) was amended in February 2025, to designate any sexual act committed without consent, regardless of the use of force, threats, or deception. This change replaced the previous definition, which required proof of coercion, and brought Polish law in line with international standards emphasising consent as central in cases of sexual violence.

The Penal Code also criminalises sexual exploitation, trafficking, and the promotion of sexual exploitation. Punishable offenses also encompass acts such as stalking (Article 190a, added in 2011). Finally, the Penal Code has recognised psychological violence since its entry into force on 1 September 1998. Article 207 §1 explicitly refers to both physical and psychological abuse against close persons or individuals in a dependent relationship.[7]

Further, the Act on Counteracting Domestic Violence was enacted in 2005 and amended to enhance protection. The most recent amendment, signed into law by President Andrzej Duda in 2023, broadens the definition of domestic violence to include economic violence and cyberviolence, thereby extending protections these forms of abuse.[8]

When considering discrimination in the workplace, the legal framework is broad. The Labour Code indeed provides the possibility to take legal action based on any grounds for discrimination, which does not need to be explicitly named in the code. This can thus include gender, ethnicity, sexual orientation, but also any other matter, like past experiences.



Antidiscrimination protection in Poland is not limited to employment relationships under the Labour Code. The Anti-Discrimination Act extends protection against discrimination to other areas such as education, access to goods and services, and contracts governed by civil law (e.g., civil contracts). The Act provides a closed catalogue of protected grounds, among which sex (gender) is explicitly included.[9]

[7] Kodeks karny, ustawa z dnia 6 czerwca 1997 r. (Dz.U. 1997 nr 88 poz. 553 z późn. zm.)
[8] Act on counteracting domestic violence signed by the president (2023). Ministry of Family and Social Policy of the Republic of Poland. (2023).
[9] Ustawa z dnia 3 grudnia 2010 r. o wdrożeniu niektórych przepisów Unii Europejskiej w zakresie równego traktowania (3 grudnia 2010). Sejm Rzeczypospolitej Polskiej. Dziennik Ustaw 2010 nr 254 poz. 1700.

Further, the application of the EU Whistleblowing Directive (2019/1937) is also relevant to misconduct in the workplace. After an important delay, Poland implemented the Directive through the Whistleblowers Protection Act, which came into effect in September 2024. The Act mandates the establishment of internal whistleblowing reporting procedures for legal entities with at least 50 employees and with both internal and external reporting channels; the latter managed by the Commissioner for Human Rights' Whistleblowing team. The Act provides protection from retaliation to whistleblowers, guarantees their right to confidentiality and ensures they can receive feedback on follow-up actions taken by competent authorities.[10] However, it should be noted that many small organisations are not concerned by the Act.

Finally, since February 2024, the so-called "Kamilka Act" governs the recruitment of workers in activities involving children (e.g., education, leisure, medical treatment, provision of psychological counselling, but also transport or sports). Employers must check whether future employees are recorded sex offenders before hiring them.[11] However, it is reportedly not always clear for organisations that do not explicitly target children in their programming whether and how to apply this law, especially for humanitarian organisations whose activity may occasionally include children as participants.

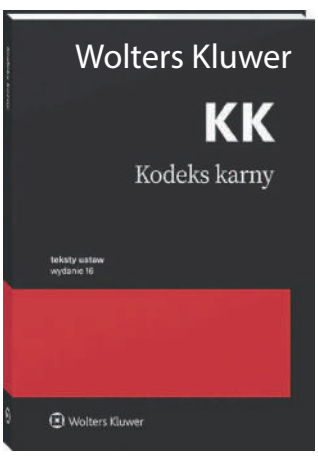
Legal, systemic and cultural challenges to the implementation of existing laws

Despite these legal advancements, significant challenges remain in ensuring legal accountability for perpetrators.

Legal limitations, such as the narrow definition of rape until February 2025, and the failure to recognise economic violence before 2023, have led to insufficient protection for at-risk individuals. This resistance has hindered progress in protecting vulnerable populations.

Most recently, the amended definition of rape, while praised for recognising the importance of consent has also created additional concerns regarding its application, the difficulty to explicitly demonstrate lack of consent, and the differences and inconsistencies it creates with regards to other provision of the Code. These discrepancies relate notably to rape of a person living with a disability, which is now punishable by a lower penalty than rape with a person without disability, and with the age of consent, set at 15, which implies sexual acts with a minor under 15 are punishable to the same degree as rape.

Civil society organisations have called for a full review of relevant Penal Code articles to ensure consistency and protection for those seeking justice.[12]



[10] Podsumowanie pierwszego miesiąca przyjmowania zgłoszeń zewnętrznych sygnalistów (2025). Zespół do spraw Sygnalistów Biura RPO: https://www.gov.pl/web/sygnalisci/podsumowanie-pierwszego-miesiaca-przyjmowania-zgloszen-zewnetrznych

[11] Kamilka Act - obtaining certificate. National Criminal Register: :https://www.gov.pl/web/krk-en/kamilka-act---obtaining-certificates

[12] See in particular (1) Ombudsman for Children (2024) "Zmiana definicji gwałtu. Jest opinia RPD" (Changing the definition of rape. Opinion from the Ombudsman for Children): https://brpd.gov.pl/2024/04/08/zmiana-definicji-gwaltu-jest-opinia-rpd/; and Feminoteka: "Stanowisko Feminoteki ws. projektu o zmianie definicji gwałtu" (Feminoteka's position on the project to change the definition of rape): https://feminoteka.pl/nasze-dzialania/stanowisko-feminoteki-ws-projektu-o-zmianie-definicji-gwaltu

Additional challenges are related to the implementation of this legal framework in practice. As mentioned by two experts consulted for this study, the application of the legal framework is impeded by several challenges.

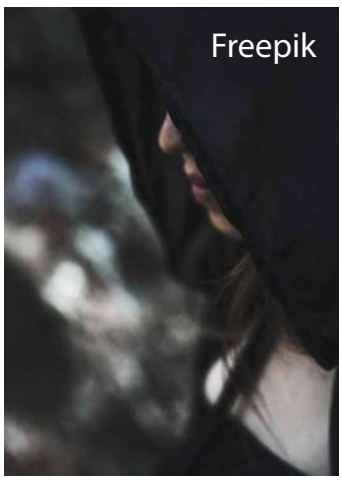
"In theory, we copy-paste EU standards, but in practice many factors impede it: jurisprudence, practice of the state, and cultural factors. There is the legal framework on one side and the reality on the other."

KII – Expert

This is partly linked to cultural resistance, limited means, lack of awareness from the public and, sometimes, from law enforcement or other actors in charge of providing support.

In cases of alleged workplace discrimination, for instance, there is a reversed burden of proof under Polish labour law. Once an employee presents facts indicating a presumption of discrimination, the employer must demonstrate that no unlawful conduct occurred. This legal principle aligns with EU anti-discrimination directives and has been in place for a long time. However, in practice, such cases (particularly those involving sexual harassment, which constitutes a form of discrimination) reportedly rarely reach the courts.

Recent research has started unveiling high levels of unreported or underreported experiences of mobbing, sexual harassment, and in some cases, sexual violence across all sections of society, including in universities,[13] in the art and cultural sector,[14] in media organisations,[15] vocational education, employment and services.[16] Findings across these studies point towards:



- a prevalence of gender-based sexual harassment or violence;
- very low reporting due to limited trust and/or lack of available processes or support in place;
- a lack of established body and processes to address, register and monitor reported cases within institutions or organisations; and
- several instances of people in positions of authority downplaying, minimising or invalidating the experience of those who report.

"The question is: are people using the laws in place (judges, police officers, prosecutors)? Is the legal framework in place actually being implemented?"

KII – Expert

[13] Badanie molestowania seksualnego na uczelni: powszechność zjawiska oraz analiza dostępności wsparcia na Uniwersytetach Jagiellońskim, Warszawskim oraz Wrocławskim dla osób studiujących, które go doświadczają Piotr Kister, Jakub Kocjan, Izabela Patykowska, Borys Tencer, Aleksandra Urbańska, Polskie Towarzystwo Prawa Antydyskryminacyjnego, 2022 (Study on sexual harassment at universities: prevalence of the phenomenon and analysis of the availability of support at the Jagiellonian University, the University of Warsaw and the University of Wrocław for students who experience it); Doświadczenie molestowania wśród studenteki studentów Agata Kwaśniewska, Mikołaj Winiewski, Dominika Bulska, Maria Babińska, redakcja merytoryczna – Adam Bodnar, Sylwia Spurek, Biuro Rzecznika Praw Obywatelskich, 2018 (Experience of harassment among female and male students)

[14] Być albo nie być. Pracowniczki i pracownicy polskich instytucji artystycznych wobec zagrożenia mobbingiem, molestowaniem i molestowaniem seksualnym Julia Gerlich, Krzysztof Jarzmus, Helsińska Fundacja Praw Człowieka, 2020 (Employees of Polish artistic institutions facing the threat of mobbing, harassment and sexual harassment)

[15] Molestowanie seksualne dziennikarek w Polsce Nikola Bochyńska, Paweł Prus, Natalia Żaba, Instytut Zamenhoffa, 2021 (Sexual harassment of female journalists in Poland

[16] Molestowanie seksualne w obszarach kształcenia zawodowego, zatrudnienia i usług Raport pod redakcją Magdaleny Grabowskiej, Polskie Towarzystwo Prawa Antydyskryminacyjnego, 2022 Sexual harassment in the areas of vocational education, employment and services).

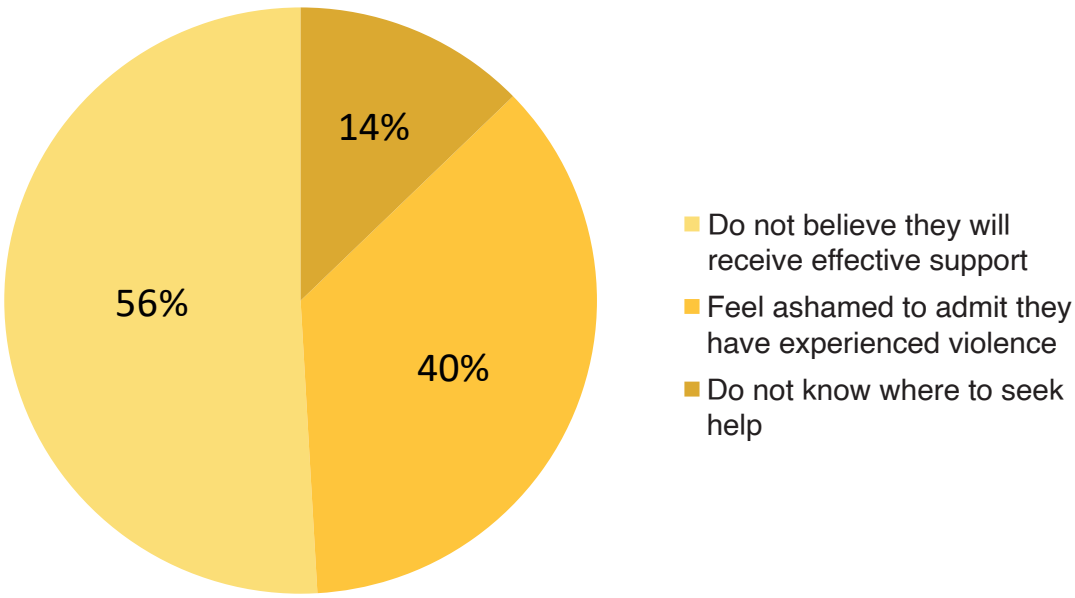
In cases of domestic violence, law enforcement or social welfare centres can start a “Blue card” procedure to identify the needs of the person(s) affected. Blue cards record individual cases of domestic violence and registers affected household. While specific to domestic violence, many of these processes also apply to sexual violence beyond the household. Recent research has demonstrated notable challenges in their application, partly due to these actors not fulfilling their statutory obligations and limited cooperation between law enforcements and social welfare centres.[17]

The Supreme Audit Office (Najwyższa Izba Kontroli – NIK) recently audited processes for preventing and addressing domestic violence, surveying district police stations and social welfare centres between 2021 and 2023. Among challenges, the audit highlights:[18]

- The lack of centralised tools (e.g., central database for blue cards integrated with other national systems, available to all public institutions involved in counteracting domestic violence), which would help support those affected by domestic violence more effectively and help gain a better understanding of the scale of the phenomenon to develop evidence-based preventative measures.
- Lack of facilities to provide immediate support and safety to those affected by domestic violence, as four of the seven audited counties have no support centre, crisis intervention centre or specialist support centre and redirect those in need to distant one, often preventing them from accessing further support.
- Limited educational and psychological follow-up for perpetrators, with low completion rates, partly due to limited offer.

[17] Najwyższa Izba Kontroli (2025) Przeciwdziałanie przemocy domowej – Niebieskie Karty. Najwyższa Izba Kontroli
[18] Ibid

Most importantly, many survivors are unaware of the support available to them. When legal tools exist, such as the recent introduction of emergency eviction orders for abusers, most survivors are not aware of it. According to the NIK audit, 25% respondents who experience domestic violence report not seeking help as they do not trust any effective support will be provided (56%), feel ashamed of admitting they have experienced domestic violence (over 40%) and do not know where to seek help (14%). Experts also report that, in many cases, survivors are unlikely to know about non-legal support or support provided by civil society.



This is grounded in social norms perpetrating underestimation of the phenomenon

As noted above, several survivors of domestic violence do not report domestic violence as it is considered shameful. Martyna Kamińskan's analysis of GBV in the EU between 2013 and 2021 highlights that it is considered a sensitive, embarrassing and inappropriate topic for public discussion in Poland.[19] This is corroborated by a 2023 Blue Line report, highlighting stereotypical perceptions often attributing responsibility for sexual violence to the person who experienced it. The report further emphasises that there is a noticeable resistance in public discourse to addressing and disseminating information on sexual violence, which hinders efforts to better understand the scale of the phenomenon and ways to prevent and address it.[20]

As highlighted by a 2024 visit to Poland by the UN independent expert on protection against violence and discrimination based on sexual orientation and gender identity, harsh abortion laws combined with discriminatory policies towards LGBT people have profoundly impacted Polish society.[21] On the one hand, this led to growing activities from civil society to step in and provide support where the state would not, while on the other hand, this also created an enabling environment for discrimination across society.

Many stakeholders highlight frustration over the slow pace of legislative change. Stakeholders consulted for this study highlighted that the current shift in international discourse presents a similar risk for social attitudes in Poland. They noted that the current framework for addressing SEA risks rely, in great part, on civil society beyond legal measures. There is a strong need for further advocacy to address remaining gaps.

[19] Kamińska, M. (2024). Sexual violence in Poland in 2013–2021: analysis of the scale of the phenomenon and the socio-economic effects of gender-based violence in the EU context. In: A. Stanimir (ed.), Contemporary socio-economic problems in analytical perspective (pp. 101-116). Wrocław University of Economics Pres
[20] Identifying sexual violence in counteracting domestic violence (6/149/2023); Blue Line: https://www.niebieskalinia.pl/aktualnosci/artykuly-niebieskiej-linii/identyfikowanie-przemocy-seksualnej-w-przeciwdzialaniu-przemocy-domowej-61492023
[21] Reid (2024). "LGBT rights in Poland: a symbolic shift is important, but no enough". UN Independent expert visit to Poland.

2.2. The emergency response in Poland

Refugees from Ukraine face high risks of GBV and SEAH

The vulnerability of Ukrainian migrant women in Poland has been reported as high even before 2022.[22] Many faced violence, exploitation, and significant barriers to seeking help. The COVID-19 pandemic exacerbated these vulnerabilities, with lockdown measures restricting access to support services. Underreporting of domestic violence, particularly among migrant women, is compounded by cultural taboos, insufficient victim protection procedures and limited access to appropriate translation support.

The war in Ukraine has exacerbated the vulnerability of Ukrainian refugees to GBV and SEA in neighbouring countries, including Poland. Family separation, socio-economic hardship, and difficulty finding safe accommodation increase the risks faced by refugees.[23] At the same time, the increase in population in need strained the limited resources already in place. Many refugees, especially those living in insecure conditions, have been subjected to SEA by landlords or other individuals in positions of power. Ukrainian women in Poland also face heightened risks of intimate partner violence (IPV). Unstable housing conditions, which are common in the refugee context, exacerbate the risk of IPV, including remote psychological abuse.[24] There are also reports of Polish men forming new relationships with Ukrainian women, some of which have led to escalating violence. Survivors and practitioners have raised concerns about the taboo surrounding IPV, with many women feeling trapped due to their dependency on their partners, making it difficult for them to leave abusive relationships.[25]

Furthermore, Ukraine's ongoing war and the influx of refugees into Poland have led to increased reports of trafficking and sexual exploitation, with many at-risk individuals coerced into the sex trade. A recent assessment by IOM and the Anti-Trafficking Task Force emphasises that refugee

[22] See for instance Situation of Ukrainian migrant women in Poland at the time of COVID-19 (2022), Cope, Keryk & Kyliushyk
[23] The COVID-19 crisis and the war in Ukraine: Gender-based violence experienced by migrant women in Polan (2024), Stelmakh, A., Slany, K., Ślusarczyk, M., & Krzaklewska, E. Jagiellonian University, Kraków.
[24] Protection from sexual exploitation and abuse: Reflections from the first year of the emergency (2023), Dulin Brass, C., Moy, M., & Iwasa, Y. FMR 72 – Ukraine: Insights and implications.
[25] Sexual exploitation and abuse against refugee women: An issue without a name in Poland (2023). Safeguarding Support Hub. Eastern Europe.

women face a continuum of vulnerability—shifting from immediate to delayed, compounded, and even dormant forms of risk as displacement becomes protracted.[26] The lack of sufficient protective measures and support systems leaves them exposed to continued abuse.[27]

Experts and representatives of Polish organisations consulted for this study specifically highlighted the lack of access to appropriate translation in places where support can be provided. This is considered among top challenges. It applies notably to formal police proceedings and courtrooms, where translation support is a right, but capacity gaps create important delays. For these cases, NGOs usually fill the institutional gap. Furthermore, in places where translation support is not an obligation (notably social welfare centres dealing with domestic violence cases), these services are even more limited or even non-existent. NGOs providing specialised support to survivors also highlight that, where translation support is provided, translators often lack appropriate training to tackle sensitive issues such as sexual violence as well as to understand the specific needs and culture of refugees.

A response driven by civil society

At the beginning of the emergency, the response was widely driven by civil society with local actors leading the response. Respondents included individuals who drove to the border to support displaced populations, existing humanitarian organisations, including some that were already active at the Belarus border, and some organisations that quickly set themselves up to respond to emerging needs. International organisations and the Polish state also started organising themselves at the regional and national level.

As one expert noted during KIIs, the early humanitarian response in Poland in 2022 was marked by chaos. Until recently, Poland had primarily been a recipient of humanitarian aid, not a provider. As a result, there was confusion around the legal status and roles of associations, foundations, and grassroots actors.

In this context, safeguarding risks were high from the outset. The issue was acknowledged but often deprioritised in the face of immediate life-saving needs. Consequently, early efforts were limited and ad hoc. They included adding women translators onto buses transporting refugees. As international actors became involved in the response, NGOs started identifying key risks. For instance, in April–May 2022, some NGOs conducted rapid assessments along the border to investigate protection and PSEA risks as well as to identify urgent gaps.

[26] Displacement and Vulnerability in the Ukraine Crisis: A Study of Human Trafficking Risks Among Refugees in Poland and Romania (2023). IOM.
[27] The COVID-19 crisis and the war in Ukraine: Gender-based violence experienced by migrant women in Poland (2024). Stelmakh, A., Slany, K., Ślusarczyk, M., & Krzaklewska, E. Jagiellonian University, Kraków.

Some safeguarding measures therefore started being implemented early on, though without clear framework. A representative from a local organisation reflected on this period of introducing ad hoc measures:

"Before the emergency response, there were no such standards in Poland. Being part of the response forced us to create everything from scratch, consulting with different organisations"

KII – local organisation

At the beginning of the emergency response, a risk assessment conducted by CARE with multiple partners highlighted that a limited understanding of PSEA and a visible need for safeguarding assurances and systemic solutions in Poland. In addition to the general absence of PSEA measures, responders were often new or small organisations, with limited staff and high reliance on volunteers.

In several cases, there was limited attention to SEA and a lack of knowledge regarding safeguarding standards. In cases where SEA was identified as a risk, or reports of SEA incidents identified, there was no capacity for investigation. This risk assessment enabled the identification of an urgent need at the time: trained investigators to respond to potential reports of SEA incidents. CARE therefore provided the first training of this kind for SEA investigators among partner organisations.

Efforts of humanitarian organisations to integrate PSEA

According to experts, the international framework for addressing SEA risks was fully introduced a year after the start of the emergency. By 2023, a more structured international PSEA framework had been proposed and formally adopted by relevant working groups. This framework offered guidance for both international and national humanitarian actors, outlining standards of conduct, reporting procedures, and protective measures under the broader "protection" umbrella. It formalised activities such as staff training, awareness-raising, and monitoring, helping to institutionalise SEA risk mitigation in line with Poland's broader obligations under international law.

The AAP-PSEA Network has made progress in raising awareness, establishing reporting mechanisms, and training aid workers.[28] The network focuses on both Accountability to Affected Populations (AAP) and PSEA. Overall, the response to SEA has been supported by UNHCR and local PSEA networks, which engage NGOs, refugee-led organisations, and volunteers to raise awareness and build capacity.

Even outside of the AAP-PSEA Network, local actors started introducing measures, often in response to international donor requirements. The 2023 update of the CARE risk assessment mentioned above highlighted, for instance, the introduction of safeguarding policies and staff code of conduct along with training and staff awareness raising activities in organisations which previously had no established measures.

Efforts to embed PSEA into key sectors, such as education and healthcare, have yielded some positive results, supported by grassroots organisations advocating for stronger protections. Ongoing collaboration between international organisations and local actors focuses on addressing immediate protection needs, with the long-term goal of building resilience among both refugee and host communities. The role of civil society organisations is critical in addressing the needs of survivors, providing support services, and advocating for more inclusive, survivor-centred legal frameworks. However, as public resources remain limited, NGOs continue to face increasing pressure to meet the growing needs of those seeking safety and stability.[29] Humanitarian organisations, despite their best efforts, face constraints that hinder the effectiveness of programmes, especially with the continuously increasing volume of displaced individuals from Ukraine.[30]

[28] Violence Against Women and Girls (VAWG) Helpdesk. (2021) Summary: Barriers to reporting
[29] CARE Poland (2023) Annual Report
[30] IRC protection monitoring report, April–July 2024. International Rescue Committee

2.3. Introducing SEA standards in the Polish context

Applying international standards in emergency contexts with specific social norms and cultures presents challenges

Humanitarian actors are bound by the Inter-Agency Standing Committee (IASC) commitments to integrate AAP with PSEA. These are grounded in the core humanitarian principles of using power responsibly and ensuring affected communities have influence, access to transparent information, and mechanisms to report misconduct.[31]

Through the IASC six core principles, PSEA encompasses rules prohibiting paying for sex, asking for sex, offering help or jobs in exchange for sex, having sex with anyone under 18, sexual assault, while also attempting to regulate sexual relationships between aid workers and community members.[32] Recent IASC commitments for SEA and AAP focus on:[33]

- Guaranteeing a victim-centred approach, prioritising survivor safety, dignity, and informed consent. A victim-centred approach ensures that survivors control decisions about what happens next; confidentiality and protection from retaliation are guaranteed; support services (e.g., psychosocial care, legal aid) are accessible without requiring formal complaint processes. This approach aims to reduce re-traumatisation and promote healing and empowerment for survivors.
- Changing organisational culture on the frontline of emergency response: Frontline environments are particularly susceptible to power abuse due to urgency, instability, and weak oversight. To change culture, humanitarian leadership must shift from reactive to proactive accountability; staff must be trained in ethics, conduct, and respectful engagement; local partners and frontline staff should be empowered as key actors in upholding protection principles, not merely implementers. Changing organisational culture means prioritising trust-building, open communication, and zero-tolerance on misconduct across all operations.

[31] From tick box to turning point: Getting accountability right for improved humanitarian action (2023). Doherty, J. London: ALNAP/ODI.
[32] IASC Six Core Principles Relating to Sexual Exploitation and Abuse (2019)
[33] AAP-PSEA 2-Pager: Accountability to Affected Populations and Prevention of Sexual Exploitation and Abuse. https://interagencystandingcommittee.org; Protection from sexual exploitation and abuse and sexual harassment in humanitarian action. (2022). Humanitarian Exchange.

- Increase ability to prevent and protect from SEA, through anticipatory structures: Pre-deployment training, codes of conduct, and robust vetting procedures must be standard; community-based risk mapping and early warning systems can help identify vulnerabilities; agencies must ensure inter-agency coordination, consistent reporting mechanisms, and follow-through on disciplinary actions; donors and leadership must invest in adequate staffing and resources for safeguarding.

However, applying these standards is not always straightforward depending on local contexts. International NGOs need to apply these principles globally while adapting to local legal framework, norms and practices. This can create difficulties. For instance, a representative of IOM consulted for this study mentioned that, at the start of the emergency response in 2022, initial training and monitoring materials on PSEA did not align with the Polish context. Monitoring questions included asking about the distance to the nearest water point, whereas initial shelters were established in office buildings. Similarly, some training material for Polish organisations reported being trained on what to do in cases of child marriage, which they deemed irrelevant to the Polish context.

Humanitarian organisations face difficulties in navigating these complexities while maintaining effective communication and ensuring the protection of vulnerable groups. For this, understanding the local cultural, policy and legal context is essential.

There are notable differences between international humanitarian standards and the Polish legal framework on addressing risks of SEA and misconduct

As explained above, SEA prevention was introduced as a result of the emergency response to the full-scale invasion of Ukraine and the influx of refugees in Poland. In humanitarian organisations, the English acronym SEA (or SEAH in some instances) is the term used in Polish for organisations in their policies and internal standards, as there is no equivalent in the Polish language. This resulted directly from requirements from international donors.

In some cases, differences between the Polish legal framework and international standards create situations where it is difficult for local organisations to apply standards requested by international donors while also respecting Polish law.

For instance, the legal age of consent in Poland is 15. This differs from the international definition of a child in humanitarian contexts, where standards and policies affirm that there should be no contact with children under 18 years old. A relationship between a humanitarian worker, teacher or any other potential service provider and an individual aged 16, for instance, would be legal in Poland but against international standards. This leads to issues regarding how to address such instances.

In addition, during the initial emergency response and to this day, several organisations heavily rely on volunteers, without whom support could not be provided. During risk assessments conducted by international organisations, the question of conducting background checks on volunteers and more generally all staff working with vulnerable populations was raised. The so-called "Kamilka act" referenced under Section 3.1 does provide a legal obligation for those working with children. Introducing these checks for all humanitarian workers, however, does not align with the practice in Poland and creates concerns regarding potential legal implications and the creation of new standards.

Further, there is an obligation for Polish citizens to report some cases of sexual abuse (depending on key criteria, including age) to the police or prosecutor office. A few international humanitarian workers were surprised about this obligation to report. They believed this obligation comes in contradiction with the survivor-centred approaches promoted by international humanitarian actors. Interestingly, some humanitarian practitioners have raised concerns about the misinterpretation of the survivor-centred approach to deflect SEA reporting obligations.[34] The survivor-centred approach emphasises placing the rights, needs, safety, and dignity of the survivor at the core of all action, from disclosure to investigation and response. However, it is important to stress that the survivor-centred approach is not a survivor-led approach: Humanitarian professionals have a duty to act and respond when SEA allegations are reported to them. This is a point that often leads to confusion across the humanitarian sector, and this tension is particularly interesting to consider in the Polish context.

Finally, the question of terminology is essential when considering discrepancies between national and international frameworks. The classification of sexual exploitation, abuse and harassment does not correspond to the Polish criminal code. As outlined above, it aligns with some laws (e.g., preventing human trafficking), but there is no framework that directly relates to this, nor is there any regulations around the provision of aid.

[34] See "Post-#aidtoo: are we setting ourselves up to fail?" (2022) Hannah Clare and Carolyn Bys, in Humanitarian Exchange.

3 Perceptions of SEA and misconduct among aid recipients

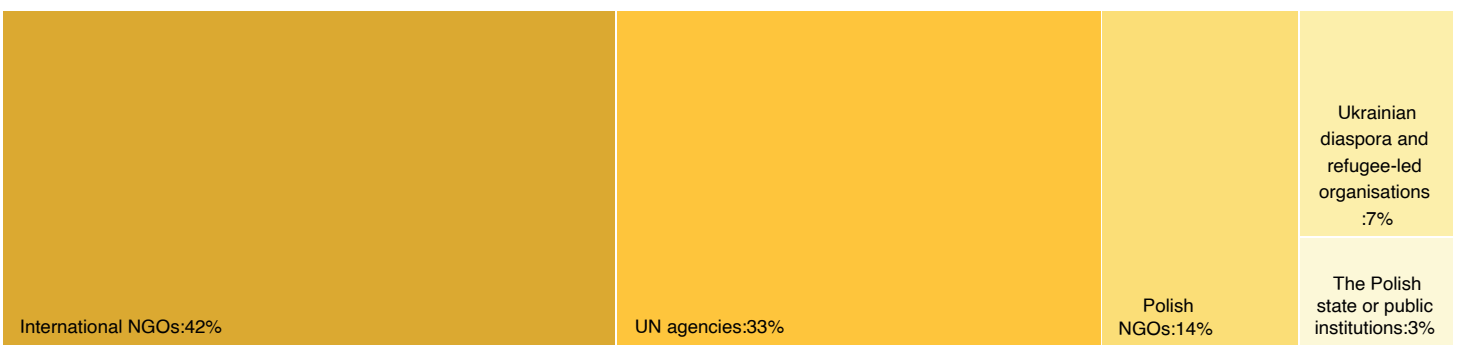
3.1. SEA does not appear as a key concern among aid recipients

Perceived quality ofservices is high withpoints of attention on follow-up

As part of the survey, respondents were asked to answer a few questions on services they had received – across all sectors, including cash assistance, food or non-food items distribution, shelter legal assistance, etc. For up to three organisations, questions focused on respondents' perceptionsregarding different aspects of service delivery. The aim was to identify any differences in perceived quality of services based on the type of organisation delivering them, to co textualise further findings on risks linked to SEA and misconduct.

Respondents were asked to name up to three organisations they received services from. The graph below shows the share of organisations mentioned by respodents, by type:

Figure 1: Organisations respondents recall receiving services from



Please note that this reflects respondents' perceptions. Where they refer to services received from an international NGO, it is possible that respondents refer to services funded by said INGO and implemented by a different organisation, which they are not aware of or do not remember. This can be linked to several factors, including respondent's previous knowledge of some organisations and the requirements from international funders to clearly communicate their support (e.g., through posters, branded vests and matrial, etc.).

For each organisation mentioned, respondents answered a series of questions to assess their satisfaction on specific elements. The table below presents scores by types of organisation:

Table 1: Perceived quality of services by type of organisation

	Overall quality and relevance	Relevance to individual case	Respectful treatment	Accessibility	Privacy	Follow up	Total score
International NGOs	98%	98%	98%	96%	98%	91%	96%
UN agencies	95%	97%	98%	93%	96%	86%	94%
Polish NGOs	94%	97%	96%	92%	99%	88%	94%
Ukrainian diaspora and refugee-led organisations	95%	98%	100%	98%	100%	95%	98%
The Polish state or public institutions	100%	100%	94%	100%	100%	94%	98%

Overall, all respondents perceive a high quality of services delivered by all types of organisations – with all satisfaction scores above 85%.

The main area for improvement regards follow-ups, with some respondents feeling like they were left to themselves after receiving the services (note that in most cases, respondents referred to cash assistance and distribution of food and non-food items).

There are limited differences in overall scores between types of organisations providing assistance. However, a few elements are interesting to note:

- Respondents are overall highly satisfied with services from public actors, but 6% report not being treated with respect, the lowest score across all types of organisations on this dimension;
- UN agencies and Polish NGOs receive the lowest score overall, mainly brought down by lower scores on relevance, access and follow-ups.

Among those who provided more details on elements leading to dissatisfactions, these aligned with the result above, referring mainly to the lack of follow up and to difficulties accessing places for assistance:

Lack of follow up	Limited accessibility
"The help ended and goodbye." (UN agency)	"At 5 a.m. you queue for medicines." (UN agency)
"They promised crutches and didn't give them." (international NGO)	"Far away from the city." (Polish NGO)
"They did not give me the promised medicines." (international NGO)	"Impossible to get to Krakow to get documents" (UN agency)
	"No public transport arranged to get there" (Polish NGO)

Considering likely positive bias regarding aid received, these provide points for further attention on service delivery in Poland for all stakeholders regarding following up after providing services, on accessibility for all actors (specifically for UN agencies and Polish NGOs), and finally on ensuring respectful treatment of aid recipients for public services.

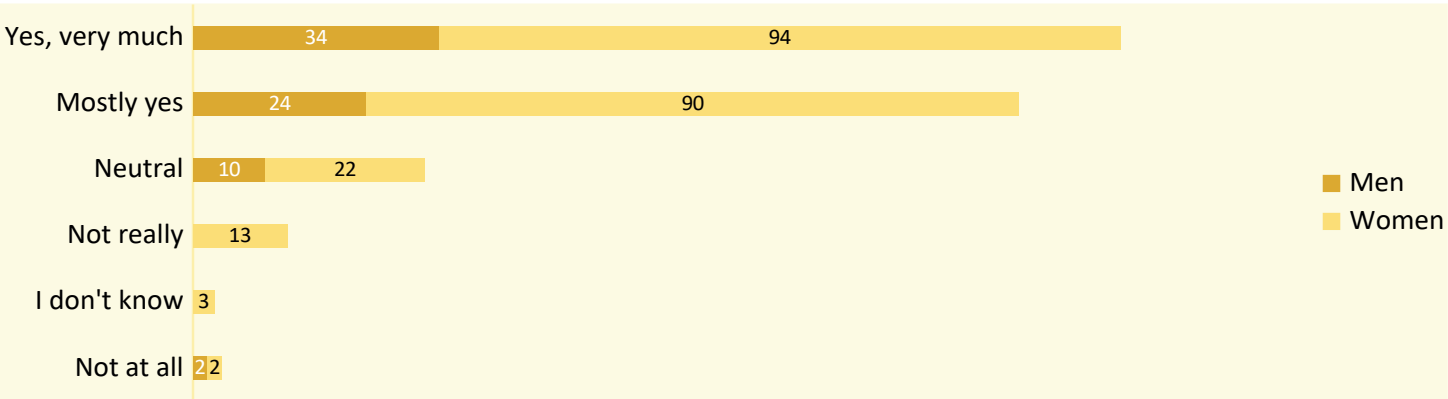
Interestingly, these findings also align with respondents' perceptions of limited risks and potential discomfort they might face during aid delivery.


CARE / Raegan Hodge

Key perceived risks or discomfort among aid recipients are not linked to SEA and suggest a need for better access to clear information

At the start of the survey, respondents were asked about their perceived safety when accessing humanitarian aid (see Figure 6 below), about risks they might face and about potential discomfort. In line with overall satisfaction on services received, respondents report feeling safe when accessing assistance, with no distinction between men and women.

Figure 2: Perceived safety among respondents - Do you feel safe when you access humanitarian assistance? (n=294)



Without prompting, respondents never mentioned risks related to sexual exploitation, abuse, or misconduct by humanitarian workers.[35] Instead, they spoke about concerns such as fear about the future, the war and adjusting to life in a foreign country. It is interesting to consider these results from a needs prioritisation perspective: individuals in a situation of vulnerability will likely focus first on their basic needs for survival before considering any other type of need (including safety).[36]

Most respondents reported no current risks in Poland. Among those who did, key concerns included:

- uncertainty about the future;
- discrimination, either experienced or reported by relatives;
- deception and false promises, due to unclear or misleading information about services;
- and misunderstandings between aid workers and recipients.

During workshops, participants discussed the example of a woman arriving at a shelter with her children in a distressed state. They reflected that volunteers might not always know how to react, and misunderstandings can happen, especially when people are overwhelmed:

"Nobody was really at fault: it was just a situation of emotional overload."

Validation workshop with aid recipients (M)

[35] Prior to engaging in the survey, when collecting informed consent, respondents were made aware of the topics to be discussed and of the objective to understand perceptions linked to sexual exploitation, abuse and other types of misconduct. They were therefore aware of the overall purpose and topic of the survey. However, when answering initial questions about risks and safety when accessing aid, no question or prompt had explicitly focused on SEA yet.

[36] See Maslow's hierarchy of needs: 1. 1. Physiological Needs; 2. Safety Needs; 3. Love and Belonging Needs; 4. Esteem Needs; 5. Self-Actualisation Needs:

Some aid recipients reflected on the psychological discomfort of being labelled a "refugee," which led to feelings of exclusion. However, one woman said this was less of an issue in Poland, where Ukrainians felt more at home compared to Western Europe.

There were distinctions across gender lines, confirmed during validation workshops. Male respondents were likely to discuss financial risks; uncertainty linked to their ability to secure a job and access housing. The lack of funds on arrival in Poland was seen as a main factor of vulnerability to manipulation or financial exploitation. Female respondents, on the other hand, reported risks linked to caring for their families, including fear that their children might be taken away from them due to different norms and rules in the EU than in Ukraine.

One person mentioned concerns about misuse of personal data, which was not widely shared. However, it resonates with some feedback from one practitioner who mentioned growing concerns among aid recipients asked to share their personal data (e.g., to register for cash assistance or other services).

Beyond risks, participants were asked to reflect on potential discomfort they might experience during the delivery of aid. Discomfort was mainly linked to practical issues.

While most respondents said they experienced little or no discomfort, those who did cited:

- language barriers;
- access or logistical issue (resonating with findings on satisfaction detailed under Section 4.1); and
- and misunderstandings or conflicts when accessing services or aid delivery (e.g., when standing in queues).

During a workshop, women raised concerns about poor shelter conditions, including hygiene, overcrowding, and unsuitable arrangements for families with babies. One woman expressed frustration about being promised a clean, private room with a shower but finding the opposite. This added to her stress, especially when health issues arose. This signals potential gaps in terms of safe and inclusive programming to ensure that participants' safety and dignity is prioritised, and meaningful access to assistance and services is promoted along with accountability and participation.

Some respondents also mentioned fraud concerns. While recipients mainly described fears, not personal experiences, humanitarian workers cited known examples of aid diversion since the emergency began. This also suggests examples of gross misconduct, even if not linked to SEA. Interestingly, wider misconduct than SEA, including fraud, aid diversion, discrimination, bullying, can be an entry point to discuss SEA with aid recipients, as it creates space to discuss programming misconduct and identify potential sexual violence risks.

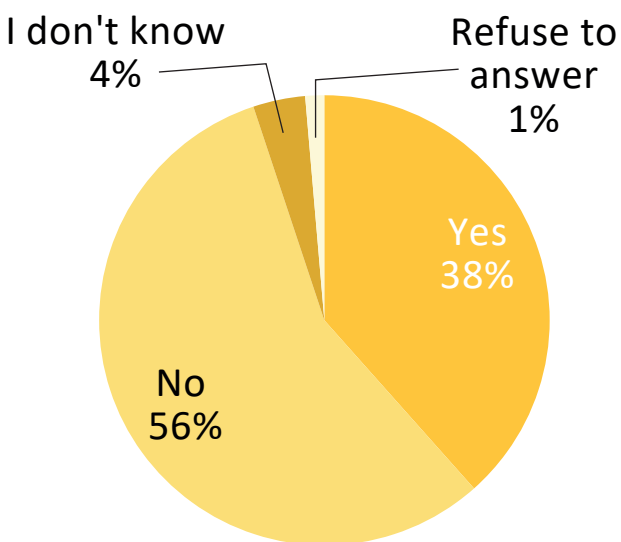
Most perceived risks or discomfort discussed revolve around difficulties communicating and align with key demands from aid recipients to have better access to up to date information on available services.

3.2. Understanding low interest in SEA

Aid recipients display a lack of interest in the topic of SEA

Respondents displayed a lack of interest in discussing SEA and wider risks of misconduct. This was found at the start of the survey when asked general questions about risk and discomfort without prompt, but also after discussing specific scenarios illustrating examples of potential abuse or misconduct. As shown below, more than half of respondents expressed having no interest in learning more about the topic.

Figure 3: Interest in learning about SEA among survey respondents -Would you like to receive more information and learn more about this issue? (n=294)



Those who expressed no interest usually gave the following reasons:

- They have no time.
- This is not considered as a “real” problem.
- They have other priorities to consider.
- They find that enough is already done.

This aligns with findings that practical considerations are seen as higher priority. It also suggests limited awareness and recognition of the risks. The analysis suggests that it is linked to deeply rooted social norms combined with the vulnerable position of refugees in the face of power imbalances.

Aid recipients focus instead on expressing gratefulness

Throughout the survey and regardless of question asked, most respondents insisted on sharing positive feedback and expressing their gratitude. Enumerators reported several respondents asking them to record clearly their positive feedback on services received. Validation workshop participants displayed a similar attitude:

"Everything is very good, very-very-very good."

Validation workshop with aid recipients (M)

This suggests a combination of genuine gratitude along with fear of losing access to services, as is often common among aid recipients across all types of emergencies. Some practitioners further reflected on the specific Polish context and a perceived expectation that refugees should appear grateful to "merit" the support they receive. This highlights a barrier in and of itself to providing feedback, let alone reporting abuse.

This expression of gratitude is sometimes combined with self-deprecation or identifying other aid recipients as troublemakers. Interestingly, this was also reflected in other survey questions. When asked about solutions to improve reporting, there was limited interest in enabling better participation of communities. Some respondents were concerned increased participation would create unnecessary complications, with other aid recipients creating further difficulties.

This suggests that many aid recipients internalise a political discourse and put humanitarian workers on a pedestal, making it difficult to collect honest feedback. Further enquiries into perceived power imbalances, discussed below, confirmed this perception.

Deeply rooted social norms limit recognition of the risks

Consultations with humanitarian workers as well as further discussions with aid recipients during workshops suggest that this lack of interest is a direct result of a lack of awareness or recognition of risks linked to SEA. This is rooted in social norms, including patriarchal norms on the role of women, trivialisation of abuse, and cultural legacy focusing on the importance of not appearing weak while prioritising the collective.

Abuse is a taboo topic. Respondents are not comfortable discussing this issue and therefore tend to dismiss it. At the individual level, this attitude seems linked to the importance not to appear weak in the face of adversity.

"I would not find myself in this situation"

Validation workshop with aid recipients (F)

This aligns with perceptions from experts and humanitarian workers highlighting tendencies in both Polish and Ukrainian culture to hide vulnerability. Several practitioners highlighted that refugees, and in particular Ukrainian women who have been at the centre of the emergency response, reject discourses based on vulnerabilities (i.e., using terms such as survivor or victim).

Abuse also appears to be normalised to a certain extent, with high levels of stigma and shame for those who do speak out:

"It's real. It happens. But people are afraid to talk because of what others will think."

Validation workshop with aid recipients (F)

Promising practice: Avoid loaded terms and survivor-centric discourse.

Practitioners in the Polish context and other emergency contexts (e.g., Sudan) highlight the importance of progressive approaches to discuss SEA in communities with high levels of taboo. Such progressive approaches rely on:

1. Avoiding loaded terms (sexual exploitation, sexual abuse) and jargon to instead focus on concrete examples.

2. Focusing on "empowered bystanders" discourse rather than personal experience or vulnerabilities.

3. Adopting a gradual approach focusing on gaining trust before approaching the topic. This can start with safe and inclusive programming as an entry point to further discuss misconduct in general, and later on SEA more specifically.

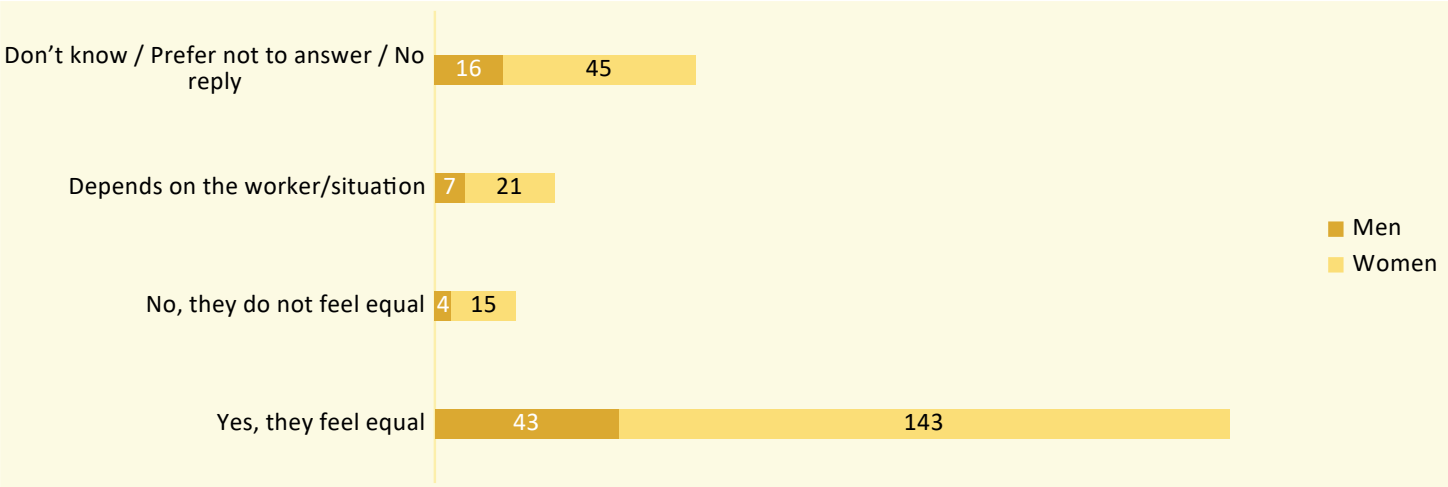
NB: *Points 1 and 2 were applied in the approach for this study's survey. Respondents' unwillingness to discuss the topic highlight how important progressive dialogue is in order to build trust.*

There is limited awareness of power imbalances at play during assistance

A clear understanding of power imbalances from humanitarian workers is essential as there is limited awareness of this dynamic among aid recipients

Aid recipients were asked an open question regarding perceptions of power imbalances, with opportunity to further detail and contextualise. Analysis of their responses shows that over 60% do not feel any power imbalances. A limited number of respondents (under 10%) explained that it depends on the situation, referring notably to the nationality of humanitarian workers as a factor (i.e., respondents perceive themselves closer to Ukrainian staff who may have experienced similar displacement than Polish staff), and their general attitude. Around 20% did not provide any further detail, which suggest that a large portion does not feel comfortable discussing this.

Figure 4: Aid recipients' perceptions of power dynamics with humanitarian workers - When people in your community interact with humanitarian workers, do they feel equal? (n=294)



As further questions revealed a tendency to idealise aid workers, this points to a limited awareness of real power imbalances among aid recipients.

When reflecting on risks of abuse among practitioners, one example came up several times: aid recipients' willingness to pay to access services they need (e.g., medical or psychological), which could be taken advantage of. This power imbalance is further reinforced by cultural norms. It is indeed common practice among many refugees that something should be offered in return for assistance, which could be categorised as corruption.

"My colleagues have to decline gifts daily. It is not a bribe but an expectation that you should be thanked with a gift."

KII – IOM staff

Yet, aid recipients have some expectations regarding how aid workers treat them

Despite limited awareness regarding risks of power abuse from workers, aid recipients expect minimum standards of behaviour. They mainly revolve around treating displaced people with dignity, avoiding shouting or aggressive behaviour, avoiding arbitrary decisions and following through with communicated plans. Aid recipients explain that they expect workers to follow clear rules, with codes of conduct for volunteers and humanitarian workers.

Disruptions in promised timelines or unprofessional attitudes were cited as distressing, especially when refugees are already emotionally strained. This again aligns with expectations of follow ups after providing services. This was confirmed during discussions with humanitarian staff, including fieldworkers who insisted on the necessity to always consider the emotional state of distress or war-induced trauma aid recipients might be in.

Key takeaways

Aid recipients do not consider SEA as a priority amid immediate practical concerns. Instead, their priorities are **access to up-to-date information** on available legal, medical and psychological services, **clear communication on assistance and follow up.**

This lack of interest in and awareness of risks linked to SEA and misconduct of humanitarian staff suggests that ***prevention*** **should be the primary focus before addressing reporting barriers.** Programming efforts should focus on raising awareness and opening a conversation through progressive dialogue, tailored to different communities.

Promising practice: Focus on AAP first to improve SEA awareness

Community engagement (i.e. AAP) appears to be a structured way of working that would increase SEA awareness. It would consist in continuous interaction between organisations and crisis -affected people and communities for mutual social and organisational outcomes through:

- Systematically sharing timely, relevant and actionable information with communities.
- Supporting meaningful participation and leadership of affected people.
- Ensuring feedback systems are in place to enable communities to assess and comment on the performance of humanitarian action, including on sensitive matters such as SEA.

When presented with hypothetical scenarios, aid recipients identify serious misconduct as abuses of power but mostly do not feel concerned

In anticipation of respondents' limited awareness and reluctance to speak about SEA risks, scenarios illustrating potential situations of exploitation, abuse or misconduct risks from humanitarian workers were presented to survey respondents. Respondents were presented with four different scenarios randomly allocated. Respondents were asked a few questions about what the scenario described and how they would react if they witnessed this situation:

Scenario 1: Marek, a young man, has been waiting for a cash assistance grant. The staff member processing his application, Monika, says that his case could "move to the top of the list" if he meets her privately. He implies that there should be "something extra" in return for accelerating his claim, leaving Marek feeling unsafe and unsure if he should report it.

Scenario 2: Zara, a young single mother, has been waiting for a cash assistance grant. The staff member processing her application, Andrzej, says that her case could "move to the top of the list" if she meets him privately. He implies that there should be "something extra" in return for accelerating her claim, leaving Zara feeling unsafe and unsure if she should report it.

Scenario 3: During a registration event, Marek, a humanitarian staff member, is visibly irritated by the long lines. He starts yelling at some refugees for not having their documents organised. One woman, Rania, becomes upset when Marek publicly mocks her accent and says, "People like you always slow us down," causing her to feel embarrassed in front of everyone.

Scenario 4: Boris, a 35-year-old man living in Warsaw applies for cash assistance. While registering at the designated office, he shares his full name as required. A week later, the humanitarian worker handling registration reaches out through Facebook to connect.

Table 2: Respondents' reactions to hypthetical scenarios

	% considering it misconduct	Terms used in answer to qualify this type of behaviour	Answers to "Would you say that something like this could happen in your community?"
1	97%	Abuse of power, harassment, extortion, exploitation	62% disagree or strongly disagree
2	92%	Abuse of power, harassment, coercion, violence	66% disagree or strongly disagree
3	84%	Unprofessional, rude, cruel	70% disagree or strongly disagree
4	55%	Unprofessional, unethical, privacy breach	18% disagree

Respondents' reactions to the above scenarios show that aid recipients clearly identify serious misconduct but face hesitation with less explicit situations.

Scenarios 1 to 3 were mostly identified as misconduct, with the majority using terms such "unprofessional", "unethical", "unworthy of a volunteer", or "inappropriate" to qualify the behaviour of the worker. A couple of respondents also qualified all three scenarios as instances of "discrimination" or "fraud."

For scenarios involving sexual advances (1 and 2), some respondents also used stronger terms including "asocial behaviour", "inhumane" and "unlawful." These were widely recognised as misconduct though not named as sexual exploitation. In fact, only one respondent used the term exploitation, in reference to the second scenario. Yet, a few respondents used terms showing a clear identifying of inappropriate behaviour: "abuse of power", "harassment", "coercion", and "violence." The slight difference in perceptions between the two is likely explained by the fact that respondents find an instance of a women perpetrator less plausible.

Scenario 3 proved less clear to identify as misconduct for some, with a few respondents downplaying or excusing the behaviour (e.g., mentioning burn out, fatigue, or the possibility that the aid recipient might have been at fault).

Aid recipients mostly do not think such incident would happen in their communities, except for the online dating app scenario

The last scenario, on the other hand, caused mixed reaction. Half of respondents presented with the hypothetical situation were not sure how to qualify this type of behaviour (i.e., answered "I don't know" or skipped the question). Among the other half of respondents, most qualify this as unprofessional, unethical or inappropriate, with some specifically denouncing a break of confidentiality or privacy. Yet, a few found this normal behaviour. Unlike the other three scenarios, more than half believed this was likely to happen in their community.

A minority of respondents (two to three per scenario) found the situation unrealistic. Even where misconduct is clearly identified, a minority of reactions suggest the need for more awareness raising. The quotes below are all from women respondents in reaction to the first scenarios:

> *"This is illegal behaviour. Humanitarian aid worker have always been decent, I did not know that such a thing could happen"*
>
> *Survey – Aid recipient (W)*

> *"This cannot happen in Poland, though it can in Ukraine."*
>
> *Survey – Aid recipient (W)*

> *"It is the employee's sense of humour. It will be the choice of the person receiving the assistance."*
>
> *Survey – Aid recipient (W)*

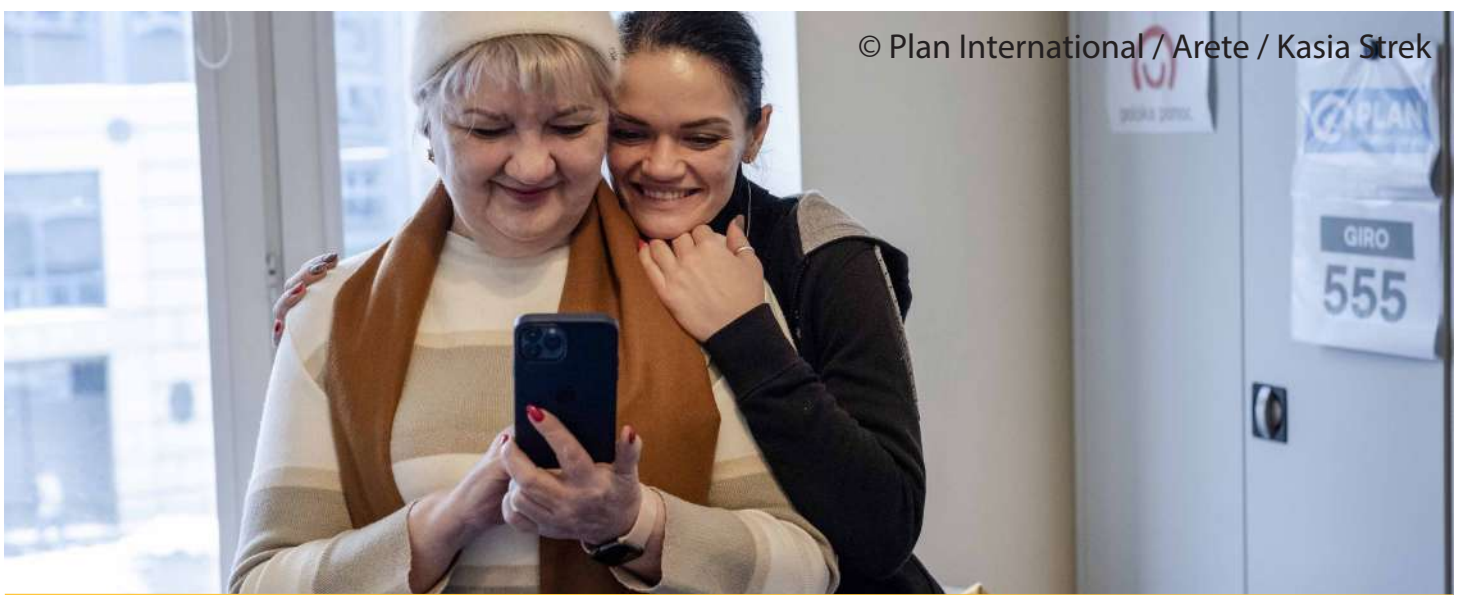
> *"I would tactfully refuse"*
>
> *Survey – Aid recipient (W)*

Key takeaways

Aid recipients clearly reject overt misconduct when presented with a hypothetical situation but do not appear concerned or aware of the potential risks in their communities.

The term 'sexual exploitation' does not seem to resonate, even to qualify behaviour identified as misconduct. This could suggest a **need to adapt vocabulary in communication material:** terms like abuse and coercion resonate more among aid recipients, along with harassment and discrimination. This also shows a **need for further awareness on risks.**

Respondents recognise unprofessional behaviour but do not consistently identify it as harmful or as abuse. Where situation could present risks but are not as explicit, respondents are unlikely to identify them. In some instances, respondents downplay or excuse inappropriate behaviour or suggest the behaviour of aid recipients might be at fault instead. This suggests a **limited understanding of power dynamics at play, which in turn limits identification of SEA risks.**



3.3. How to enable reporting for those who need it?

Despite low levels of interest in and awareness of risks, it remains essential to ensure that safe, confidential and accessible reporting mechanisms are available to those who need it.

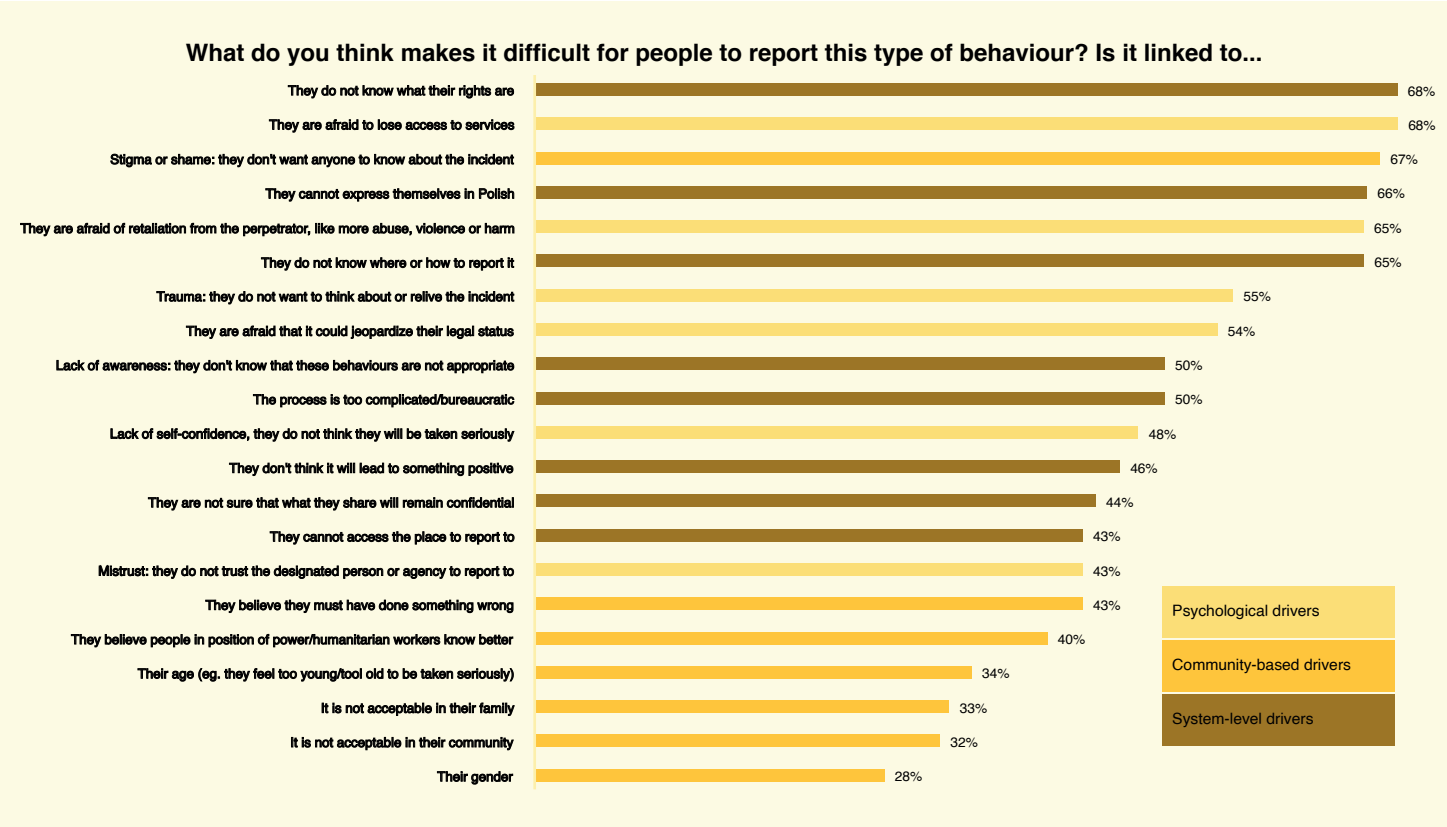
"It is not our role to educate people on feminism, but it is our role to let people who do not find it funny and do not enjoy it to know they can complain."

KII – IOM staff

Reported barriers are linked to an interplay of psychological, community-based and system-level factors

Scenarios discussed above served as the basis for a series of questions exploring awareness and preferences on reporting.

Figure 5: Aid recipients' perceptions of reporting barriers



As Figure 9 shows, respondents found that the main reporting barriers – with which over 60% of respondents agreed – are linked to:

- psychological drivers, including fear of losing access to services, and fear of retaliation;
- community-based drivers creating stigma and shame; and
- and system-level drivers, including limited awareness of their rights, language barriers and limited knowledge of reporting process and mechanisms.

In addition, qualitative data collection also highlighted strong mistrust in authorities among aid recipients (community-based driver) and the impact of war-related trauma (psychological driver). The latter was specifically emphasised by humanitarian staff from Ukraine as a factor that needs to be considered as a priority when considering the wellbeing of refugees from Ukraine.

At the individual level, psychological barriers are rooted in fear and trauma

As explained in the previous section, aid recipients' attitudes appear driven by a strong fear in losing access to assistance, shelter, or even legal protection. This informed all survey results and dominated discussions in validation workshops with recipients and workers.

"People endure and turn a blind eye to problems in order not to escalate the situation and not to lose access to services. People are afraid of being left homeless. They feel that they have to 'kiss the feet' of the workers to stay in the centre."

Survey – Aid recipient (W)

Fear of retaliation is also a strong driver, especially when considered against power dynamics between aid workers and recipients. Many feel disempowered to report abuse, particularly when the perpetrator is in a position of authority or influence. Fear of retaliation is a common factor for not reporting abuse. It is further reinforced by the vulnerable situation aid recipients find themselves in when depending on the perpetrator for resources or support.

Psychological barriers	Associated needs
Fear of losing access to assistance	Awareness raising on rights Better communication on reporting mechanisms, processes and principles (confidentiality, security, non-discrimination) Embedding of safer programming standards into the projects and initiatives from the development stage, ensuring safeguarding of participants from harm and abuse
Fear of retaliation	Better communication on reporting mechanisms and processes (with an emphasis on what happens after the report to reassure aid recipients on the quality of follow-up after a complaint – This could include for instance clear systems of "reporting companion," i.e., someone who accompanies people who complain so they are not left on their own after reporting). Ensuring confidentiality of mechanisms Providing additional entry doors for reporting, including outside the country at HQ level for international organisations could help mitigate risks in emerging emergencies. **Multiple channels should be available for reporting, with entry doors at local, national level, regional level, and global/HQ level** using different tools (website, email address, phone/Whatsapp, focal points, etc). – localised and tailored to the context – so that the person reporting abuse can chose their preferred channel.
Trauma linked to abuse or to experience of the war	Provide accessible psychological services with adequate translation and cultural mediation (with referral pathways to specialised services) Encourage and normalise psychological support (already more common now than at the beginning of the emergency)

At the community level, stigma, shame and mistrust in authorities limit reporting

Cultural norms, discussed in the previous section as limiting interest in SEA, also contribute to the reluctance of Ukrainian refugees to report abuse. In conservative settings, reporting abuse is seen as dishonouring the family or bringing shame, making many hesitant to come forward. Two practitioners mentioned instances where Ukrainian women who had been raped by Russian soldiers were concerned about their community hearing about it, for fear that this could bring shame on their husband.

Widespread mistrust of authorities exacerbates this issue, as many aid recipients fear that those in position of authorities will not be held accountable due to corruption or biases within the system. During validation workshops, Ukrainian humanitarian workers specifically insisted on this point. According to them, mistrust in authorities is high across Ukraine and reflected in refugees' attitudes towards Polish authorities. It is further reinforced by systemic barriers including limited access to information, language and lack of awareness on their rights in Poland.

Community-level barriers	Associated needs
Stigmatisation and shame	Awareness raising on social norms in Poland and across the humanitarian sector – for instance, through peer advocates and survivors' networks organising community dialogue, or through anonymous online storytelling platforms, to influence social norms beyond individual perceptions
Mistrust in authorities	Access to clear and up to date information Awareness raising on rights Accountability from authorities Promotion of third parties to collect reports, providing an additional channel for reporting – potentially more trusted

Ninja Taprogge

Systemic drivers primarily point towards limited access to information, unclear communication and low awareness on aid recipients' rights in Poland

Both the survey and qualitative data collection showed that refugees from Ukraine have low awareness of their rights, and most importantly of their rights once they are in Poland. This aligns with low levels of awareness regarding SEA risks discussed in the previous section. This is confirmed by a recent survey by UNHCR Poland, where 55% of respondents did not feel informed about their rights and assistance options in Poland.[37]

Those systemic gaps are language barriers and lack of knowledge on how and where to report abuse. The UNHCR survey also confirms this finding, revealing that 76% of respondents were unaware of feedback channels offered by UNHCR and partners.[38] One practitioner consulted also highlighted language as a key barrier to reporting, both in terms of language used (often English on online forms, for instance) and on terminology and length of the forms which can discourage respondents who may not understand them. This points to gaps in communication about and accessibility of reporting mechanisms.

Systemic barriers	Associated needs
Limited awareness of rights	Awareness raising on social norms in Poland and across the humanitarian sector, in affected people's preferred language. Awareness raising on key rights of aid recipients Protection and safeguarding risks analysis to make sure humanitarian actors share tailored messages.
Language barriers	Available translation and cultural mediation when communicating on SEA – adapted to each community Clear and accessible translation of reporting mechanisms with localised entry points in participants' languages, adapted to their profiles and the context
Limited knowledge of reporting process and mechanisms	Communication on reporting mechanisms, beyond link, leaflet or poster "Human" entry point to introduce mechanisms Accessibility across multiple channels (hotline, email, in-person) through simplified message and clear short steps to follow

Aid recipients favour opportunities for dialogue on prevention and reporting

"People want to talk." – Validation workshop with humanitarian staff

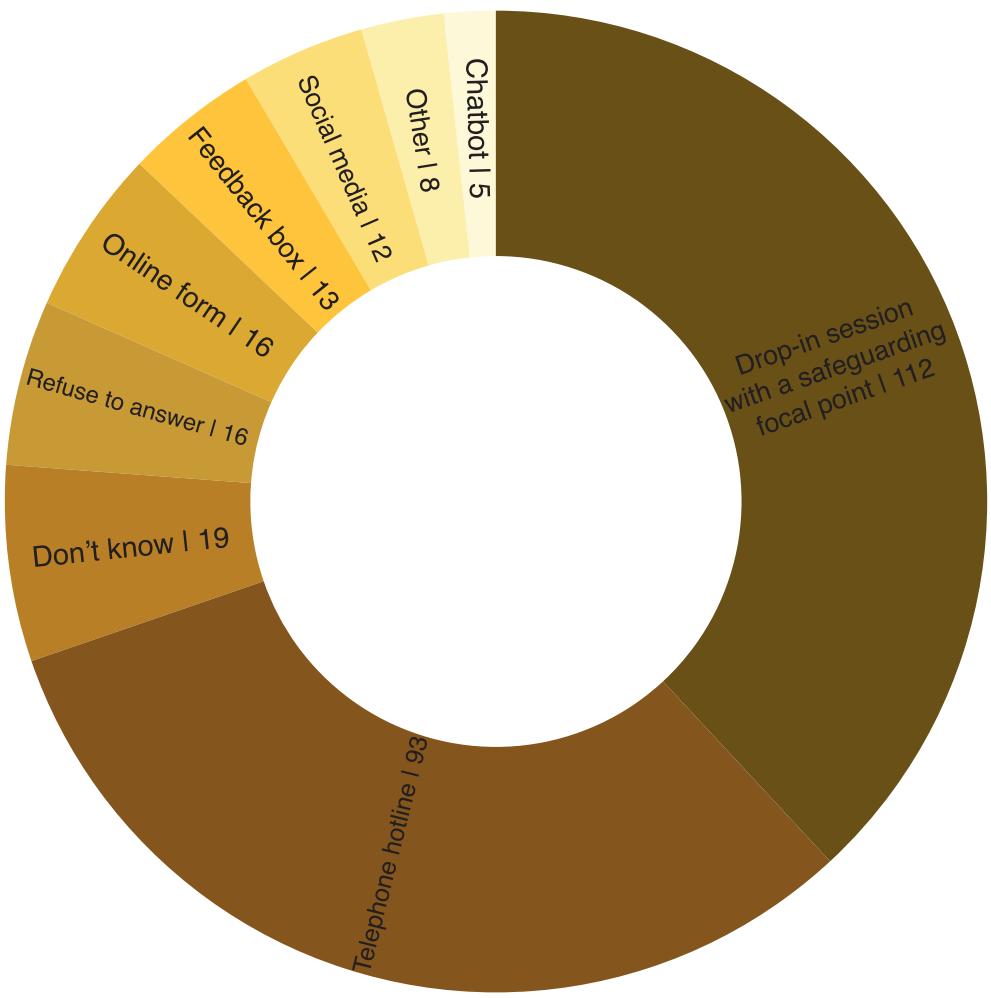
"People come for psychological or legal support but not SEA support. These vulnerable groups do not report the SEA, they come for psychological support, for instance, and during the therapy, the SEA comes out. The psychologist finds out during the session, but the victim often considers it a secondary issue."

KII – Local organisation

[37] UNHCR Poland (2024). Communicating with Communities. Survey Report.
[38] UNHCR Poland (2024). Communicating with Communities. Survey Report.

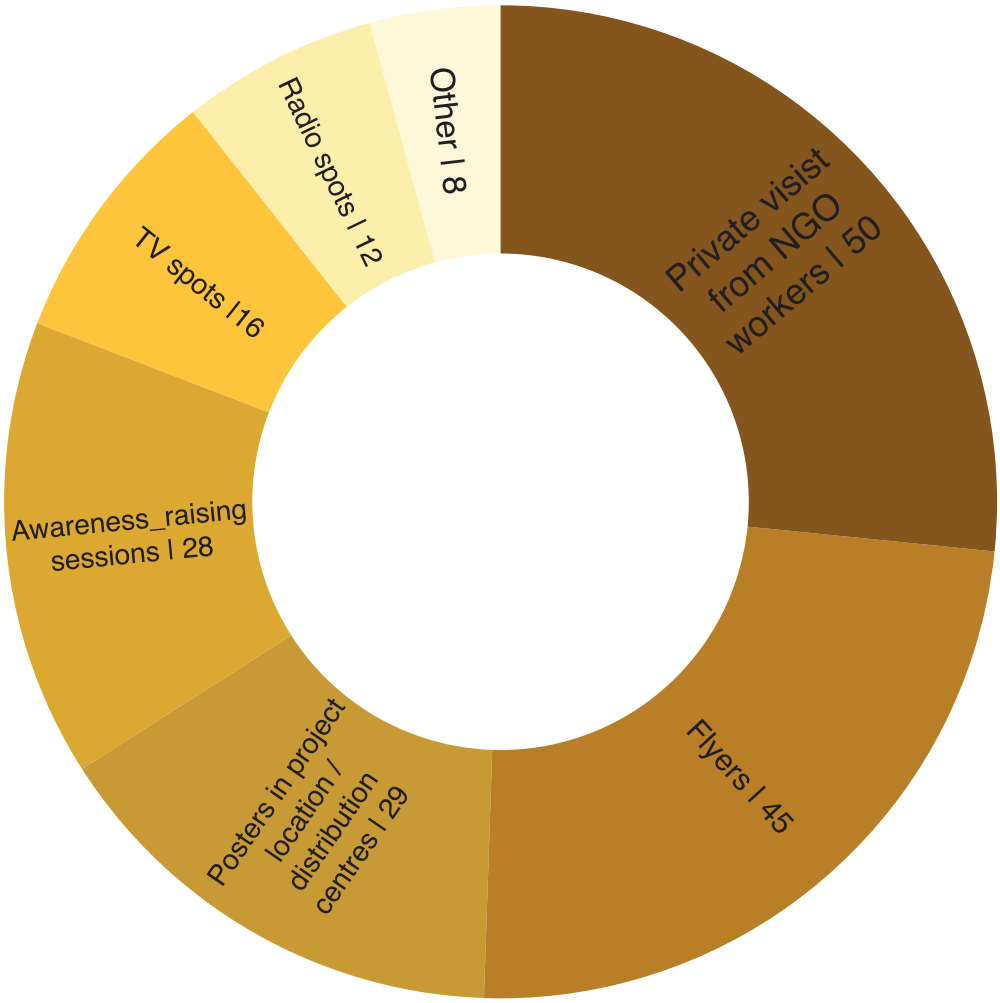
Across all ages and genders, the majority of respondents reported feeling most comfortable reporting to a focal point at the humanitarian organisation in charge of assistance (27%). This is followed by someone in their community or social circle (20%), and by the police (17%). This low level of readiness to report to the police aligns with reported mistrust in authorities. Yet, it is interesting to note that the police is still mentioned as the third preferred contact to report to. It should be noted that this concerned mostly clear sexual exploitation risk scenarios and was more prevalent among women than men.

Figure 6: Preferred communication channels for **reporting** – What would be the best channel of communication for you to report this without fear? (n=294)



Regarding preferred channels for reporting, responses highlight preferences for opportunities to talk. This aligns with findings from the 2024 UNHCR survey, which highlighted that telephone helpline is the most favoured channel for reporting issues, followed by email and messaging applications. Some respondents also mentioned Messenger, WhatsApp and Telegram as potential communication channels to make use of. Humanitarian staff also confirm this, insisting that "people want to talk." Following survey interviews and validation workshops, several respondents expressed requests for opportunities to have individual or group discussions.

Figure 7: Preferred communication channels for **prevention** – What would be the best channel of communication for you to report this without fear? (n=294)



Similarly, among respondents who expressed an interest in hearing more about SEA (only 38% as shown in Figure 9 above), private visits from NGO workers were highlighted as the preferred channel. Flyers and posters were also favoured. Aid recipients who discussed the issue further linked it to the lack of up-to-date information on available services and their limited knowledge on where to find information.

For prevention, respondents further mentioned opportunities for communication on Facebook and other social media platforms, through dedicated channels gathering relevant content and information on how to prevent and react to situations of misconduct or abuse.

Key takeaways

Beyond limited awareness and recognition of SEA, underreporting is linked to a mix of psychological, cultural and systemic barriers. Many of these can be addressed through:

- **awareness-raising on rights, opportunities to report, and available mechanisms;**
- **improving reporting mechanisms accessibility** (simplification, language, multiple digital and physical entry-points) and **confidentiality**;
- and **demonstrating accountability** of mechanisms and processes in place.

Preferred communication and reporting channels show a **need to create opportunities for dialogue between humanitarian workers and recipients.**

4 PSEA priorities for the humanitarian sector

The study also investigated potential barriers to reporting among humanitarian staff in Poland, with a focus on identifying behaviours among staff that can impact trust in reporting and investigation mechanisms for staff and aid recipients. As part of this, consultations included a focus on power imbalances to explore staff perceptions of power dynamics at play during the delivery of aid in an emergency. This section provides an overview of findings linked to perceptions of power dynamics and how they impact trust in and effectiveness of measures to prevent SEA and misconduct in general.

Freepik

4.1. Perceptions of power imbalances among humanitarian staff

Perceived power imbalances among local humanitarian workers limit trust and willingness to report

Hierarchy reportedly plays a strong role in power imbalances among local humanitarian staff

Although some humanitarian staff perceive the risk of SEA as low, many raise concerns about power imbalances. Their responses suggest ways in which their organisations or communities could be better protected.

When asked about power imbalances within Polish society generally, and among humanitarian organisations specifically, most key informants highlighted the weight of hierarchy. Senior positions are perceived as holding more influence, benefiting from access to information and having limited accountability. One fieldworker from a Polish organisation explained that some individuals become “untouchable” due to their ties, ability to access funding for the organisation or accumulated knowledge.

Excessive power among leadership was perceived as a common issue by several informants, in part linked to the legacy of Soviet authoritarianism, with two related behaviours among local staff:

- Deference to hierarchy: this can enable negative behaviours and perpetuate social norms fostering an environment of abuse. Two key informants also mentioned that this deference is reinforced when people in positions of authority are perceived as international staff, further fuelling perceptions of power imbalances.

> *"I accept this because they are my chiefs and because it's always been like this."*
>
> KII – Expert

- Mistrust towards management: this was mentioned by three respondents and flagged as problematic given that, in many organisations, SEA focal points are selected among the management board. This mistrust fosters a lack of trust in focal points and reporting mechanisms within local organisations, fuelling potential fear of losing an opportunity as a result of reporting, such as a job for candidates, a promotion or growth for current employees, or even opportunities in other organisations in the future (due to fear that that confidentiality would be breached even beyond the organisation).

Typical organisation culture across humanitarian organisations in Poland does not encourage reporting of SEA, misconduct or any other concern among staff

In addition to deference and mistrust towards hierarchy, there appears to be a tendency towards non-transparent practices in many local organisations. This seems to be rooted in individual fear to be seen as a "snitch" or troublemaker combined with opaque practices. Again, several respondents also linked this to the Soviet legacy.

Some referred to the "snitch mentality," fear of appearing disloyal or feeling uncomfortable if they had to report a colleague.

> *You could be seen as a snitch, not a loyal member of the team."*
>
> KII – Expert

Other respondents highlighted limited transparency on work practices, implementation of regulations and accountability. One respondent in particular highlighted that these power imbalances and non-transparent organisational culture are particularly harmful at the organisation level, but also impact the sector as a whole, supporting a culture of non-transparency:

> *"The world of Polish NGOs is small, so everybody knows each other. Going against a boss at an organisation can have further consequences for a person's career."*
>
> KII – fieldworker

Promising practice: PSEA focal points beyond management roles

Among staff consulted, some respondents highlighted promising measures in place to address fear and mistrust in management when considering reporting mechanisms:

- Rotating PSEA focal point selected through organisation-wide elections. This helps ensure that (1) the selected figure is trusted beyond the management board, and (2) the position rotates regularly.
- Appointing a PSEA focal point who is not a member of the management board, with the notice that staff can go to the board if they do not feel comfortable reporting to said focal point (e.g., because they are the perpetrator).
- Beyond PSEA focal point, encouraging a culture of openness by communicating one key message "go to someone you trust".
- Direct reporting channels at regional / HQ level can also be an option, in the event of a perpetrator at senior management level.
- Extending PSEA focal points to focal points for all types of misconduct can also help overcome some reporting barriers and encourage trust.

Humanitarian staff appear well aware of their position of power vis-à-vis aid recipients

Vulnerabilities are perceived to stem mainly from gender, nationality, and ethnicity (as well as status and hierarchy), making aid recipients particularly vulnerable to abuse from workers

Consultations with humanitarian staff also considered how certain groups may be more vulnerable to abuse. Overall, key vulnerabilities highlighted were linked to:

- Gender: in a society that remains driven by patriarchal norms to some extent;
- Nationality: further exacerbated by a certain level of fatigue among Poles regarding support to refugees, by the war, and by increasingly polarised political discourse;
- Ethnicity: with Roma and non-white minorities highlighted as particularly vulnerable.

Some practitioners also reflected on additional vulnerabilities, including in physical ability. Most notably, older people and people living with a disability were perceived as particularly vulnerable as they tend to be more dependent on aid. Age was also mentioned as a factor when referring to children, who are perceived as particularly vulnerable due to their lack of agency and sometimes limited understanding of certain situations.

Practitioners seem to have a clear understanding of power imbalances and risks of abuses towards aid recipients

All humanitarian staff consulted for this study displayed high awareness of their position of power. When asked to explain terms like sexual exploitation, abuse, or misconduct, most provided theoretical examples of how a humanitarian worker could take advantage of an aid recipient. Further, most reflected on what gave them a position of power: access to resources and information, or provision of a service or item in demand.

Most respondents displayed a clear understanding of exploitation, abuse and power imbalances. However, it is important to note a potential bias among them, given their status as safeguarding officers or as decision-makers in organisation interested in the issue or with ties to international organisations.

Consultations with fieldworkers suggest that terminology is not always clear. Indeed, fieldworkers display a clear grasp of what constitute inappropriate behaviours but are not always comfortable with terms used. Distinction between protection and safeguarding, or between GBV and SEA, are not clear to all. This was confirmed through interviews with some safeguarding officers, who mentioned challenges in explaining differences to staff.

This was confirmed through interviews with some safeguarding officers, who mentioned challenges in explaining differences to staff. The term "protection", for instance, was described as unclear:

> *"No one knows what this covers exactly, this is an imported term, humanitarian jargon."*

Such linguistic and conceptual dissonance impeded effective communication of core PSEA principles. This likely results from the recent introduction of these terms through international support to the emergency response

In some cases, respondents discussed an inversion of power imbalances

Consultations with humanitarian workers highlighted some instances where power imbalances are switched. Three humanitarian workers from local organisations explained that burnout among NGO staff is often linked to behaviours from aid recipients. In the face of vulnerability or exhaustion, abusive or aggressive behaviour has indeed been reported from aid recipients, both by humanitarian workers and aid recipients.

Consultations showed that humanitarian workers understand where these behaviours come from: high levels of vulnerability, exhaustion and pressure, trauma linked to the war experience. However, they highlighted that this should also be considered when training humanitarian staff to ensure they have the tools to react to such behaviours.

This clear understanding from humanitarian workers is essential in light of limited awareness of this power imbalance among aid recipients (see section 3.2)

4.2. PSEA measures have improved but important gaps remain

Local organisations have established PSEA measures in response to international donor requirements

As explained under Section 2, local actors had limited systems, due process, and capacity at the beginning of the emergency response. Perceptions of power imbalances discussed above suggests that awareness of SEA and misconduct risks has increased.

All organisations consulted through interviews, or the online survey have now implemented codes of conduct, policies and staff training tackling SEA and broader safeguarding. In most cases, this resulted from requirements from international donors.

To implement these measures, local actors received support:

- from international organisations (though not always tailored to the local context); and
- from local organisations specialising in supporting survivors, addressing gender inequalities, or addressing discrimination.

Overall, measures appear to be in place. Yet, selection bias among informants should be taken into account. This could not be the case for all organisations in Poland, as informants for this study are likely either interested in the topic or tied to donors who requested the study. One informant mentioned that safeguarding and PSEA measures might not be that widely implemented beyond those who have ties to international donors.

Reporting mechanisms are in place across organisations consulted, with designated focal points. However, their use is limited.

Few instances were discussed of aid recipients using them, and even less so of staff. Most reported uses of reporting mechanisms are described below:

- In most cases, aid recipients sharing positive feedback, request for additional support, and in some cases, suggestion for change in programme implementation;
- In a few limited instances, concerns over some aid recipients' behaviours were raised, by staff or by other aid recipients. Such issues were either not addressed (e.g., perpetrator had left the programme by the time it was reported) or addressed with support from public actors (in cases requiring reporting to the police). It should be noted that most practitioners consulted report limited cooperation with public actors beyond legal requirements. There appears to be a strong separation between public actors and humanitarian actors, with the latter perceiving themselves as activists and institutional actors as part of a separate sphere.
- Limited instances also included staff raising internal concerns, though not linked to SEA or misconduct. These were dealt with internally.

Challenges in achieving a balanced relationship between international and local actors while promoting international standards can impact how PSEA processes are implemented

Staff of local organisations report that donor- and INGO-centric approaches lack adaptation to the local context

Humanitarian staff from local organisations perceive challenges in achieving a balanced relationship with international donors. This stems from funding requirements that demand compliance with international standards, often without adaptation to the local context.

Four local key informants highlighted early challenges in applying these standards, using terms like "imposition" and "top-down". Some examples, such as training on child marriage or strict gender-segregated services, stemming from different emergency contexts were cited as irrelevant to the Polish context or even harmful in some cases, excluding women with young sons from support.

International requirements also reinforced feelings of dependence and lack of agency among local actors. Respondents reported feeling unable to reject donor demands, ranging from contractual requirements to request to participate in assessments or to provide communication material such as photographs of aid recipients.

> *"We feel used. It is possible to refuse requests, but it appears risky."*
>
> KII – Local organisation

Local organisations also reported that standardised approaches overlooked their diverse capacities. Some had relevant expertise, particularly those already working on issues like GBV, and were therefore able to adapt quickly. One key informant mentioned that many humanitarian workers reported “feeling small” after several training on topics they were already familiar with. While most organisations lacked processes for safeguarding or SEA at the start of the response and many still do, this shows the importance for international donors to adapt to the varied capacities of local actors.

These issues are not unique to Poland. They reflect broader global challenges around localisation, the development of equitable partnerships and the need for better understanding and respect of local capacities.

This structural challenge unfortunately overshadows key nuances, sometimes limiting meaningful implementation of policies

The large number of actors involved in the emergency response has led to critical gaps in SEA and safeguarding, especially due to limited awareness. Several experts noted that Polish civil society and public institutions often downplay SEA risks, based on the belief that such issues are unlikely to happen in a "civilised country" like Poland. This shows a lack of understanding of safeguarding concerns.

Standardised approaches from international actors can reinforce this perception, making SEA policies seem irrelevant. This perception can stem from three elements:

- Lack of adaptation to the local context using examples or material referencing situations that do not resonate with staff from local organisations, thus reinforcing this idea that SEA risks are not relevant to Poland.
- Limited recognition of individual organisation's expertise and capacity, repurposing standardised material without a prior assessment of needs at the organisational level and of specific activities of said organisation.
- Administrative or contractual requirements presented without prior training or discussion of what they entail in practice and how to implement them (e.g., through dedicated funding).

"If there was one curriculum between donors with webinar and certificate, it would have been easier for all international organisations to create an e-learning platform with a single course, including every standard. The whole team could go through this and then specialists would have more in-depth trainings in person."

KII – local organisation

As a result, these measures are often treated as formalities or another demand from international actors to comply with, regardless of its purpose. This may weaken long-term safeguarding efforts in both humanitarian work and Polish society.

Further, this lack of adaptation also does not provide a positive model. The online survey distributed among organisations showed that PSEA policies and practices are not necessarily grounded in local needs assessment. Please note that this is based on responses from only 10 organisations and therefore not representative. However, organisations which took part in the survey are likely among those with the most up to date practices due to their interest in the topic or link to international actors that motivated their participation.

Figure 8: Online survey responses “Are existing PSEA measures in your organisations based on…” (multiple choice, n=10)

This lack of grounding in local assessments and in recognition of different capacity needs among local organisations risks limiting potential for meaningful impact. One respondent highlighted that not considering the level of knowledge of various stakeholders when introducing standardised measures limits the potential to draw on existing expertise at the local level to target gaps. It might also limit the potential to tap into existing structures that could lead these processes based on local ownership.

Promising practice: Exercise to identify discrepancies between international standards and local practices, laws and regulations.

Existing IOM trainings include a simple exercise to discuss discrepancies between intentional and local standards, which have been met with positive feedback from local actors. This could be replicated in future trainings for local actors on SEA in Poland as well as in future emergencies.

Through a participatory exercise, the training requires participants to identify whether illustrative scenarios correspond to a breach of national law or of international standards. This then leads to open discussions and questions on practical examples and questions that practitioners might face. This type of exercise helps open dialogue, move away from top-down dynamics, and identify together potential points of tension in the application of required standards. Crucially, concrete examples are essential and help move away from international humanitarian jargon.

Important challenges remain with regards to organisational culture and capacity

As described under Section 4.1, power imbalances and biases at play in the Polish humanitarian sector mean that organisational culture does not always meaningfully promote safeguarding. This is partly linked to power imbalances within Polish organisations, with mistrust of and potential abuse from hierarchy. This fosters a lack of trust in reporting mechanisms and in designated focal points when they hold senior positions.

It is also linked to challenges in embarking local actors in solutions to fix identified issues and adopt international standards; whereby local actors' perceptions that safeguarding requirements are not tailored to their operational environment can reinforce the consideration of these requirements as box-ticking.

Further, important capacity gaps remain:

- All actors consulted highlight the lack of funding and personnel resources to properly address SEA risks. In particular, they regret the lack of long-term funding to address SEA gaps within organisations beyond project-specific requirements.
- There are varied levels of knowledge and understanding of SEA terminology, especially among fieldworkers. They recognise inappropriate behaviours but are not always clear on differences between safeguarding and protection, or harassment and abuse. Feedback on validation workshops among humanitarian staff highlighted the benefit of a group session tailored to discussing SEA, reflecting about definition of key concepts together and identifying potential examples. This aligns with feedback from key informants who called for regular opportunities to hold team meetings and individual sessions with qualified individuals to discuss questions regarding SEA and other misconduct.
- There is limited to no capacity for following up on reported concerns. Key informants reported that most organisations do not have the capacity to investigate reports should there be any. A key factor for underreporting among staff is linked to perceived inaction or lack of accountability. If an organisation is not able to investigate and thus respond to reports, this directly impacts trust in advertised mechanisms.

Promising practices: Support measures from the PSEA network

In the current crisis affecting the humanitarian sector, it is urgent to address these capacity gaps among local organisations. The PSEA network has implemented key support measures, which align with these gaps. These include, notably:

- **Tailored awareness-raising campaigns:** Addressing low awareness among communities receiving support is among the PSEA priorities. Campaigns to raise awareness on SEA risks have focused on interactive material (e.g., videos) and in-person visits, including with translators and mediators to address cultural barriers.
- **Establishing a pool of qualified investigators** from different humanitarian organisations across Poland: In theory, any organisation can request support from the pool of investigators to address concerns or reports of abuse. In practice, however, it has not been used to this day.
- **Advocacy for screening employees:** The PSEA network supports advocacy campaigns to introduce background checks for employees of the humanitarian sector, with a view to reducing risks of misconduct.

5 Recommendations

The table below provides a detailed summary of recommendations stemming from the study findings. They are presented by actors concerned and include relevant resources to support their implementation. Please note that recommendations for international actors should be considered for the Polish context as well as any future emergency in different contexts. These recommendations were identified as a result of discussions with experts, humanitarian staff from local and international organisations, and a validation workshop with the consortium commissioning the study.

Actors concerned	Proposed recommendations	Relevant resources
General recommendations		
Polish policymakers	1. **Support the collection of evidence on domestic violence, sexual exploitation and abuse on a large scale in Poland.** This could include (1) encouraging audits focused on specific sectors or organisations (e.g., in all shelter centres, in organisations working with refugees, etc.); and (2) supporting the establishment of a central registry for Blue Card procedures. 2. Conduct **trainings for professionals dealing with survivors of sexual violence,** including law enforcement, social welfare centres, shelter staff, humanitarian staff.	See recent audit on combatting domestic violence by the NIK: https://www.nik.gov.pl/aktualnosci/przeciwdzialanie-przemocy-domowej-niebieskie-karty.html IOM/UNHCR/INTERPOL resources on SEA training for Polish law enforcement agencies could help inform content of trainings for

	3. Introducing **obligatory response** procedures across all Polish organisations for mobbing, sexual harassment and sexual violence.	professionals working with refugees, adopting a victim centred approach. Furthermore, civil society organisations focused on combatting sexual exploitation, abuse and harassment in Poland could also support training design for specific actors.
International and local actors	4. Conduct **joint advocacy initiatives to encourage changes to the law and have both the Penal Code and Labour Law adapted to international standards.** In particular, this could include encouraging a review of laws pertaining to sexual violence, abuse and exploitation to ensure consistency across different measures and to promote a clear understanding and application among all relevant actors (judiciary, law enforcement).	
International actors	5. **In the current context of decreasing budget, it is more important than ever to dedicate allocated funding to PSEA within project funding generally and for dedicated project focusing on SEA awareness-raising and further capacity-building. A good practice to potentially replicate is to streamline PSEA funding into funding cycles with dedicated lines (e.g., as M&E funding).**	
Prevention		
All actors providing assistance (including public actors where relevant)	6. **Improve aid recipients' access to information on (1) their rights, (2) on available services,** including legal services and action, **(3) on the duties of humanitarian workers and expected behaviour,** including Code of Conduct, and **(4) on reporting channels in the event of a misconduct.** Adopt a participatory approach with aid recipients to develop content and approach for awareness raising materials and activities. 7. Raise awareness through **interactive material, progressive dialogue and discourse based on "empowered bystander"** as opposed to survivor portrayal. During the development of the awareness raising materials and implemented actions, consider the different needs and abilities of the vulnerable groups.	Consider existing tools and campaigns produced by the PSEA network that could be replicated across the country. If SEA is too sensitive to discuss among some communities, a gradual approach could focus on accountability, humanitarian and ethical principles andstandardsand safeguarding. This would gradually introduce sensitive topics, such as SEA, into the conversation. IASC – Guidance note on PSEA terminology and its recommended translation into Polish language

		https://psea.interagencystandingcommittee.org/resources/guidance-note-psea-terminology-and-its-recommended-translation-polish-language
Local organisations	8. Ensure clear guidelines and policies are in place and followed up with SEA trainings for staff based on **concrete examples** beyond terminology, and monitoring of their implementation. 9. Encourage **regular and progressive dialogue among teams.** 10. Build trust and provide **individual supervision or have a contact point to discuss** questions and concerns (within the NGO or through a network, e.g., a pool of advisors maintained by the PSEA network could be considered). 11. **Move from compliance towards a culture of safeguarding, modelled by champions** (e.g., PSEA network).	Essential resources (including trainings materials, repertory of trainers and communities of practice) to support move towards a culture of safeguarding: • Bond Safeguarding Leadership Tool (for small or large organisations): https://safeguarding-toolbond.org.uk/how-to-use • Safeguarding resource hub: https://safeguardingsupporthub.org/ • CHS alliance: https://www.chsalliance.org/protection-from-sexual-exploitation-abuse-and-sexual-harassment/ • IASC – Learning Package on Protection from Sexual Misconduct for UN partner organisations, Afrida Case Study video, Polish: https://psea.interagencystandingcommittee.org/pl/resources/iasc-learning-package-protection-sexual-misconduct-un-partner-organizations-afrida-case
International actors	12. Adapting international standards to local contexts • **Work with experts, lawyers and other resources (e.g., Commissioner for Civil Rights Protection in Poland) to adapt** training, tools and requirements to local context. • International actors could **audit local legal frameworks** and decide through a defined process to apply the higher standard when there is a difference between the two frameworks (e.g., the age of consent).	ICVA resources and principles to engage in equal, constrictive and transparent partnerships between governments, academia, the private sector and affected populations: https://www.icvanetwork.org/transforming-our-network-for-impact/principles-of-partnership/

	Through this process, it could also be decided to not formally follow the local legal framework in promotion of fundamental rights (e.g., in legal systems where marital rape is not explicitly criminalised, or where violence against LGBTQ+ individuals is not explicitly addressed; or in contexts where sexual offences are tied to death penalty). 13. **Empowering local actors and adapting requirements to the varied capacities and needs of local organisations:** • **Support advocacy efforts to encourage donors to align standards** to the extent possible, taking into consideration the size and activities of local organisations. • **Empower local organisations through co-creation of trainings** taking into account the capacity, dynamics and specific activities of local organisations, incorporating local perspectives and providing technical assistance to implement processes in different sectors. This implies developing resources and trainings tailored to specific sectors too (e.g., education, women's rights, health). • Provide **training of trainers (ToT)** for humanitarian staff that should be able to conduct sensitisation in Polish and Ukrainian, adapted to different vulnerable populations. 14. **Demonstrate transparency** and communicate about their policy, their preventive, responsive, and corrective actions. Accountability needs to be demonstrated by actions and international actors can lead by example and encourage trust building.	IOM resources on SEA training for Polish law enforcement agencies could inform future training of trainers.
Reporting and Response		
All actors providing assistance (including public actors)	15. **Build trust and increase accountability** by communicating on reports, results and measures taken to address concerns. 16. **Share information on existing reporting mechanisms** and distinguish between feedback and reporting mechanisms. This should include how to report/find help within the humanitarian system, but through Polish institutions. If feeling safe to do so, aid recipients should have the choice to report where they want.	Examples of how to strengthen accountability through communication: **Doherty, Jennifer. (2023)** From tick box to turning point: Getting accountability right for improved humanitarian action. **London: ODI/ALNAP**

	This is also a way for NGOs to showcase a higher level of accountability. 17. Clearly **communicate steps** in the reporting and response process. 18. Organise **drop-in sessions** for aid recipients to ask questions, collect information and to flag any concern. 19. Provide **accessible channels to report** (taking into consideration language, adapted terminology, length, single point of entry regardless of type of abuse, multiple channels possible). 20. Guarantee anonymity **and confidentiality.**	
Local organisations	21. Provide **evidence of the response process** (deadline, response rate, roadmap showing potential actions that could be taken etc.). 22. **Involve third parties** to avoid intimidation and fear. This could be a first step towards developing a robust, principle-based, independent, reliable system, able to effectively manage cases, therefore encouraging reporting.	Consider calling on pool of investigators maintained by PSEA network Adopt a victim/survivor -centred approach from violation to redress: https://www.chsalliance.org/get-support/resource/victim-survivor-centred-approach-pseah/ The CHS Investigator Qualification Training Scheme (IQTS) is also an affordable and accessible option to train local staff to conduct robust and high-quality victim/survivor -centred investigations: https://www.chsalliance.org/get-support/training/investigator-qualification-training-scheme/
International actors	23. Provide **technical support to local organisations for developing their own roadmap in responding** to reports and for guaranteeing anonymity and protection of those who report (guidelines on how to react, psychological supervision offering; resources for protection). 24. Provide **practical support** to answers questions on specific cases and next steps	The Misconduct Disclosure Scheme: https://misconduct-disclosure-scheme.org/

	(e.g., regional focal point, focal point with dedicated calling hours, email address with guarantee to call back). 25. Explore feasibility of creating a **single reporting mechanism,** including legal concerns, ownership and responsibilities and how to communicate about it. Note that a single reporting mechanism should have multiple and diverse reporting channels (i.e., entry points) that are accessible, confidential and safe for all users. 26. Join the Misconduct Disclosure Scheme (MDS) developed to stop perpetrators of sexual misconduct moving between organisations undetected. The Scheme facilitates sharing of misconduct data between employers. It is currently implemented by over 320 organisations.	

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