



UNHCR
The UN Refugee Agency

Regional Bureau for Europe

**10 PROMISING
PRACTICES** FROM THE
PROTECTION FROM
SEXUAL EXPLOITATION
AND ABUSE (PSEA) IN
EUROPE



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COVER PHOTOGRAPH:

MOLDOVA. Antonina, 38, and her son, were force to flee Ukraine, they look at the family photo in their room at MoldExpo, an exhibition center converted into refugee accommodation in Chisinau, May 2022. © UNHCR / Andrew McConnell

Overview

UNHCR invested significantly in risk mitigation, prevention and response to sexual exploitation and abuse (SEA) in the Europe region in 2022-2023, in particular in connection with the Ukraine emergency, where the risks were considered high due to the unprecedented scale and speed of displacement, mostly women and children, combined with high turnover of humanitarian staff and the range of new and untraditional actors involved in the response. PSEA also remains a priority for UNHCR's work for other refugees, internally displaced and stateless persons across the region.

This compilation highlights the 10 most promising practices that were initiated by UNHCR and its partners in the Europe region in 2022-2023. These practices are shared with the aim to inspire further work on PSEA in the region and elsewhere and encourage continuous learning and exchange.



Moldova. Temporary accommodation at converted exhibition centre, May 2022.
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Practice #1: Promoting responsible volunteerism (UNHCR Hungary/Regional Bureau)

Background

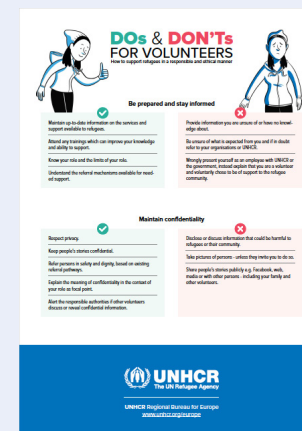
The Ukraine refugee response has been characterized by a strong sense of civic engagement. Beyond the traditional humanitarian actors, a high number of volunteers, private companies and volunteer organisations stepped up to offer support to refugees, taking on key roles in transportation, accommodation, service provision, and various other types of assistance to refugees. These actors filled critical gaps and provided lifesaving support, in particular in the first weeks of the emergency. However, a number of protection risks, including risks of SEA, emanated from the lack of oversight and capacity building of volunteers and volunteer organisations, which needed to be addressed.

Actions taken

UNHCR, in collaboration with IOM and UNICEF, issued a set of 11 concrete recommendations to host States on the vetting and registration of volunteers and volunteer organisations, including requirements to carry visible IDs, information provision, awareness raising and child safeguarding, as well as practical tips on how host States can enhance safeguards in the context of private accommodation and transportation, and how UN, NGO and other civil society actors can support and complement such efforts. The [Guidance Note on the Vetting and Registration of Volunteers and Volunteer Organisations](#) was adopted by the Regional Protection Working Group on 18 November 2022, following review and consultation. It was subsequently translated into other languages and shared with government counterparts and partners at country level. UNHCR and partners also issued a [Dos and Don'ts](#) leaflet, a [sample Code of Conduct](#) and a sample [Volunteer Undertaking](#), and offered training opportunities and information sessions for volunteers involved in the response.

Strengths, challenges, and lessons learned

The Guidance Note was considered a useful tool in raising awareness of the potential risks of SEA related to the presence of volunteers and volunteer organisations. It supported capacity building of volunteers, implementation of partners' capacity implementation plans (notably with regards to Core Standards 2 and 3) and enabled consistent advocacy messages with government counterparts across different countries and contexts. However, the implementation of the recommendations varied between the different government authorities, relying on their willingness, capacity, and resources to take the recommendations forward. Moreover, the 'Dos' and Don'ts' were also found to be useful when supporting the training of partners and other actors, such as for instance staff at the Blue Dot Hubs and enumerators who were engaged in assessment, monitoring and profiling activities.



Practice #2: Working with refugee-led organisations on PSEA (UNHCR Slovakia)

Background

The level of awareness around SEA was considered to be very low in Slovakia at the onset of the Ukraine emergency. A number of concepts related to sexual misconduct, gender, and gender-based violence were unfamiliar to actors on the ground and difficult to talk about, both amongst the refugees and within the host community. Some of the refugees also indicated that the existing messages around PSEA could create fear and/or misconceptions about humanitarian/aid workers, and potentially even cause harm by discouraging refugees from seeking assistance.

Actions taken

The refugee-led organization ‘[Sme Spolu](#)’ (‘We are together’) in Slovakia received a UNHCR/ICVA grant to develop culturally sensitive PSEA messages, which were integrated into broader dialogues with refugees regarding safety. In terms of methodology, they used a “safety formula” with inspiration from the UNHCR [Stay Safe campaign](#) and the [IASC Rules of Sexual Conduct for Humanitarian Workers in plain language](#), and with support from Voice Amplified. They ran in-person and digital campaigns, where they maintained key safeguarding messages without referring to “PSEA” or “sex” as such, but rather messaging such as “you will not be blamed”, “you will be listened to”, etc., which were packaged into broader messages about how to stay safe in their country of asylum. These were disseminated in Sme Spolu’s existing meetings and ongoing activities in ‘Ukrainian and Slovak House’, their community center in Bratislava, rather than organizing specific events on PSEA.

Around 11,600 refugees and 124 staff and volunteers were reached through this project, which was funded by the [Interagency Community Outreach and](#)

[Communication Fund](#), managed by the International Council of Voluntary Agencies (ICVA) and UNHCR.

Strengths, challenges, and lessons learned

The work of Sme Spolu played an important role in Slovakia, where the concept of SEA was not well known or spoken about before the emergency. Critical success factors included the organization’s connection to the host community, their strong social media presence, and their broad contacts with Ukrainian refugees across the country and beyond. For online messaging, they found it important to have an assigned moderator who would be responsive in providing information. Moreover, after they presented their project at the PSEA Task Force, other organizations reached out to Sme Spolu to seek support for their own awareness raising activities on PSEA and capacity building, creating a multiplier effect in-country. Sustainable and longer-term funding to refugee-led organisations, such as Sme Spolu, however, remains a challenge in Slovakia, as well as in other operations.



Practice #3: Enhancing partner capacity in SEA investigations (IGO and RBE)

Background

When partnering with a UN entity, such as UNHCR, organisations are required to ensure compliance with the [UN Protocol on Allegations of SEA involving Implementing Partners](#), including by having adequate capacity to investigate allegations of SEA against its own staff. This requirement is also built into UNHCR's [Project Partnership Agreements](#) and is a critical part of its partner selection and retention. Inadequate investigation capacity was identified the main barrier for UNHCR's partners in Europe to reach full PSEA capacity, with 52% of partners in the region assessed as having "low capacity" as of March 2023. This was, in particular, a challenge for new partners, as well as smaller and local NGOs, and community-based organisations, who formed a vital part of the Ukraine response.

Actions taken

UNHCR's Regional Bureau for Europe partnered with the Inspector General's Office (IGO) to organize a series of workshops for partner NGOs in Greece, Hungary and Ukraine. These were three-day workshop covering subjects such as the principles of due process; the victim-centered approach; the memory processes and investigative interviewing skills. Participants were also engaged in a number of practical exercises, including a risk analysis to assess the likelihood and impact of different types of misconduct in their organisations; a gaps analysis of existing investigation capacity at organizational level; drafting an investigation plan; and roleplaying interviews based on a fictional scenario. Where needed, the workshops were tailored to each operational context. In Greece, for example, an additional session was included on victims' assistance facilitated by UNHCR and its GBV partner, DIOTIMA, and in Ukraine, additional full-day exchange was organized for other (non-implementing) partners to share good practices. The workshops reached a total of 99 staff from 60

different partners in nine countries. In follow up of the workshops, UNHCR also initiated a regional legal review of national legislation in 11 European countries in the context of the [Misconduct Disclosure Scheme](#), in collaboration with the [Steering Committee for Humanitarian Response](#).

Strengths, challenges, and lessons learned

The workshop was well received by participants and filled a critical gap in capacity for NGO partners. The workshops were found to be particularly useful because of the number of practical exercises and because they were facilitated by experienced investigators from the IGO, who could elaborate with concrete examples from their own experience. While the workshops were considered a significant step towards enhancing SEA capacity among NGO partners in the region, continued support will be required from UNHCR and other UN agencies for many of them. Some partners will also continue to require external investigation support until full capacity has been reached. A [Learning Corner](#) was therefore organized by the [Regional Safeguarding and PSEA Network](#) to highlight existing opportunities for training and support on SEA Investigations in the region.



Practice #4: Engaging operational partners on PSEA (UNHCR Greece)

Background

UNHCR in Greece, under the umbrella of the inter-agency PSEA Working Group, decided to expand its capacity building activities to organisations who did not have partnership agreements with UNHCR or other UN agencies, and who were not members of the Working Group. This initiative was prompted by repeated SEA allegations against international and refugee volunteers associated with small NGOs with a high turnover. Many of these organizations were smaller NGOs, community-based and refugee-led organisations with many international and refugee volunteers and lacked capacity on PSEA and safeguarding. PSEA trainings for non-partners were implemented first on Lesbos, and then on Samos, based on demand, focusing on NGOs with a high turnover of volunteers. As a follow up targeted and bilateral capacity building sessions on PSEA and safeguarding were provided by UNHCR.

Actions taken

By mid-2022, UNHCR Greece had completed the PSEA capacity strengthening plans for all its implementing partners and had the expertise and best practices available to expand its engagement beyond its traditional partners. At the request of smaller NGOs struggling to manage SEA allegations, UNHCR initiated bilateral workshops adapted to these organizations, using parts of the [IASC 'Say No to Misconduct'](#) package and methodology (the power walk exercise and Afrida case study), but also introducing more practical sessions, for example on how to do reference checks, the role of a PSEA focal point, and the ['do's and don'ts'](#) for volunteers. UNHCR also shared best practices and tools from the PSEA capacity strengthening plans of partners, including on recruitment and vetting, the [Misconduct](#)

[Disclosure Scheme](#), mandatory PSEA training for volunteers, feedback and complaints mechanisms, and data protection. The focus was to support smaller NGOs to establish PSEA safeguards, train volunteers on PSEA, and raise awareness among refugees on how to report SEA allegations, thereby contributing to a 'culture of feedback' and promote appropriate conduct.

Strengths, challenges, and lessons learned

The engagement with smaller organizations was important to promote safeguarding across the sector working for refugees on the Greek islands. Critical success factors included having a diplomatic and adapted approach, often starting small and looking at practical steps for the gradual implementation of PSEA standards. Lessons learned included the need to adjust the PSEA terminology, both in communication material to refugees and in training smaller organizations, and that the use of fictional case studies helped enhance understanding of what SEA is. It was also important to ensure time and space for discussion and maintain a two-way dialogue with organizations over time. Maximizing on the expertise of working with implementing partners, UNHCR developed with IOM and UNICEF a joint resource library for NGOs which continues to be used in trainings of partners and operational partners.

Practice #5: Strengthening UNHCR's organizational culture (UNHCR Poland)

Background

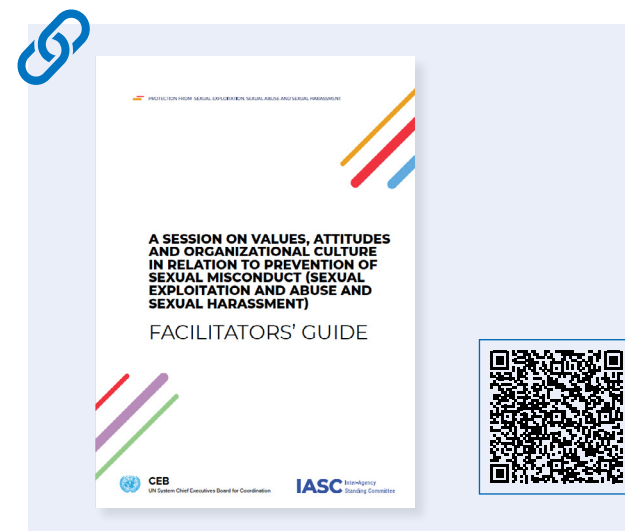
During the Ukraine refugee response, UNHCR Poland grew from a small advocacy operation with less than 10 staff members to a large frontline operation with more than 120 staff members. There was high staff turnover at the beginning of the emergency, followed by a high number of new recruitments using fast-track procedures. It was therefore seen as important to include a session on SEA and sexual harassment in the all-staff retreat organized in November 2022.

Actions taken

At the retreat, the PSEA Coordinator and the Assistant Communications Officer (and alternate PSEA focal point) facilitated a dedicated session on '[Values, attitudes and organizational culture](#)', using an adapted version of the global facilitators guide developed under the High Commissioner's PSEA championship in 2019. The session took 1,15 hours and included practical exercises focused on identifying unconscious bias and how this can affect perceptions and decisions. The session also included a video with staff testimonies and discussions around these testimonies, which enabled a facilitated discussion on what actions are expected of UNHCR staff, and especially of the team in Poland, how they can contribute to a strong organizational culture, and where and how to report any allegations. There was also an open discussion around challenges in reporting and investigations. The facilitators highlighted resources available to staff, including UNHCR's [protection from retaliation](#), the [Victims Care Officer](#), and [Staff Welfare](#). 120 staff attended the session.

Strengths, challenges, and lessons learned

The session received encouraging feedback from participants, including from colleagues who had worked with UNHCR for a long time and had not participated in a similar session in the past. The support of the Representative during the discussion was critical as to help clarify processes and expectations. Strong facilitators of both genders were considered a success factor, as was the focus on what colleagues can do to enhance organizational culture and mitigate risks of misconduct. While the session was short, it helped strengthen buy-in across different thematic functions and offices. The session will be followed by the roll-out of the [PSEA/SH internal training package](#) to all staff, so as to cover the full range of topics in relation to PSEA and sexual harassment.



Practice #6: Promoting online safety for refugees (UNHCR Hungary)

Background

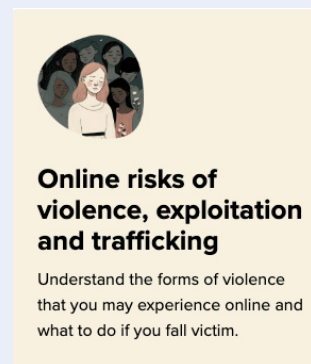
Since the beginning of the Ukraine emergency, refugee support networks and websites with offers of help have proliferated on social media platforms. Facebook groups, Viber and Telegram channels are the primary connectors for refugees from Ukraine who are seeking assistance, accommodation, transportation, work, or sponsorship. Refugee children and their families are also turning to digital solutions more than ever to support children's learning, socialization, and play. Among many well-intentioned initiatives, it's challenging to spot malicious content being posted online. Limited features exist to ensure safeguarding, privacy, and vetting of individuals or organizations offering help. Against this backdrop, many refugees, and refugee women and girls in particular, have expressed that they feel vulnerable when seeking assistance online, yet their growing financial insecurity leave them with little options but to keep using these channels and, when doing so, take various risks.

Actions taken

UNHCR in Hungary, in collaboration with the UNHCR Innovation Service, therefore launched an innovative project to enhance refugees' capacity and skills to self-protect in the online space, and to easier detect and flag malicious content and exploring strategies to strengthen safeguards adopted by online platforms when moderating posts and vetting content. A new section of the Hungary Help page called '[Safe Online – A guide to be protected on the internet](#)' was launched to inform refugees on how to recognize and report digital threats and where to seek help. Awareness raising and capacity building was initiated, comprised of mini-training curricula, educational booklets, and a digital campaign, building on the evidence and trends monitored on online platforms used by Ukrainian refugees.

Strengths, challenges, and lessons learned

Critical to the project's success was the strong community-based approach to project design and implementation from the very beginning. A multi-stakeholder round table, refugee consultations, and cooperation with Ukrainian organizations were instrumental in identifying the specific risks and challenges faced by the Ukrainian community, and the practical opportunities to increase awareness on online safety. Tailoring of content for youth was also found to be important. The project confirmed a heavy reliance on digital channels to seek vital information about rights, entitlements, and humanitarian aid. It also confirmed the rapid expansion of ICT-facilitated exploitation, scams, frauds, trafficking, and incidents of online GBV, and highlighted an urgent need for humanitarian organisations to include the provision of tools and resources to promote safe and responsible online behaviour an essential part of any protection strategy, including for PSEA.



Practice #7: Joint PSEA trainings for national law enforcement and border guards (INTERPOL, UNHCR and IOM Poland)

Background

During the first year of the war in Ukraine, there were more than 10 million border crossings from Ukraine into Poland, almost four times the number in any other country. Almost 90% of those fleeing were women and PSEA was a rather new concept for national actors. One of the priorities were to sensitize law-enforcement and border guards about their role in responding to SEA, while at the same time protecting the rights and security of the victims and preventing potential harm or revictimization.

Actions taken

UNHCR and IOM, under the umbrella of the PSEA Network, collaborated with INTERPOL to offer Polish law enforcement officers a series of training sessions on PSEA. The trainings were piloted in the Podkarpackie region, the main entry point for Ukrainian refugees coming into Poland. Five one-day training sessions were delivered to over 130 government officials over the period 15-19 May 2023. The training package was adapted for the Polish National Police, building on existing material from [Project Soteria](#) and the [IASC “Say No to Misconduct”](#), and aimed at strengthening the participants’ abilities to protect refugees and other members of the affected population from SEA, and to promote survivor-centered and “do-no-harm” approaches in responding to SEA allegations. The initiative was coordinated in country through INTERPOL’s National Country Bureau (NCB).

Strengths, challenges, and lessons learned

The pilot was positively received by the participants and ensured access to government counterparts which UNHCR and IOM do not work with on a regular basis, in particular on issues related to PSEA. The tripartite collaboration between IOM, UNHCR and INTERPOL was a critical success factor for the pilot, each bringing its expertise and experience to the training, and is recommended maintained for future trainings of this kind. The pilot also highlighted possibilities for further capacity-building, information-sharing, and collaboration with national law enforcement at country level. Areas that need to be further refined includes procedures for information-sharing around allegations of SEA against humanitarian workers which do not constitute crimes in national law, and guidance for how and when humanitarian organisations refer SEA cases that constitute potential crimes to national law enforcement. The training package is to still be revised, based on the feedback from the pilot. The initiative has a great potential to be replicated in other operations in Europe and beyond.

Practice #8: Integrating PSEA in the work to enhance Refugee Accommodation Centers (UNHCR and WHO Moldova)

Background

136 Refugee Accommodation Centers (RACs) were established by the Moldovan authorities to provide temporary housing and assistance to people fleeing from Ukraine, of which 58 remained active in May 2023. While the RACs provide refugees with free and much-needed temporary accommodation upon arrival, they were also found to entail a number of risks, including due to unclear lines of accountability for the management, safety, and service provision. Against this backdrop, UNHCR and WHO integrated RACs into the Inter-Agency SEA Risk Assessment in 2023, so as to inform and prioritize interventions.

Actions taken

With the support of the Regional Bureau for Europe and building on the GBV/SEA safety assessments conducted elsewhere in the region, the UNHCR Moldova Field, PSEA, PSEA and Shelter teams worked in collaboration with WHO to develop a [risk assessment tool](#) to evaluate the RACs. The tool encompasses 83 indicators across nine thematic areas: access control; access to information; disability inclusion/ accessibility; safe disclosure; staffing; codes of conduct; lighting; privacy; and access to services. Trainings were organized on how to use the tool and field visits were conducted to various RACs to assess their performance against the agreed indicators. This information was then analyzed and presented in a Safety Index, which UNHCR teams are using to plan and prioritize interventions in different RACs, and to inform the development of the transition plan for the closure of some RACs.

Strengths, challenges, and lessons learned

The RAC assessments provided a valuable opportunity to raise awareness on PSEA mainstreaming among the different teams, organizations and authorities involved in the RACs, while providing concrete and tangible elements to consider during monitoring visits, and a clear evidence base to inform and prioritize UNHCR and partner interventions and support, as well as advocacy with the relevant authorities. Some assessments had to be re-done for data quality control, highlighting the importance training enumerators not only on the usage of the tool per se, but also to have a good understanding of PSEA. The Safety Index also revealed other critical areas for intervention to mitigate SEA and other protection risks in the RACs, especially on disability inclusion and availability of information and reporting mechanisms that are accessible for and inclusive of children.

Practice #9: Supporting partners to strengthen their complaint and feedback mechanisms (UNHCR Moldova)

Background

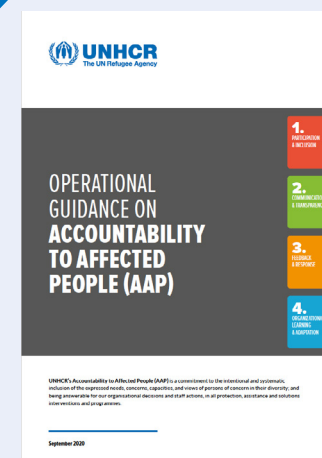
While organizations recognize the importance of complaint and feedback mechanisms, many of them face significant challenges in developing and implementing these in an effective manner. In Moldova, many local organizations lacked systems or technical capacity to implement such mechanisms with the necessary safeguards. The absence of safe and effective complaint and feedback mechanisms can result in barriers to reporting, inadequate support for victims/survivors, and an overall lack of accountability, which may again create risks to the organization's reputation and credibility.

Actions taken

To support partners at the local level, the AAP Task Force and the PSEA Network hosted a joint training on complaint and feedback mechanisms. The objective was to assist organizations in building the necessary knowledge and skills to establish and maintain effective mechanisms, and more broadly creating safe spaces and safeguarding practices, while acknowledging each organization's specific context and available resources. UNHCR facilitated a two-day session on the key principles of AAP and PSEA, and the practical steps to develop and implement complaint and feedback mechanisms. The workshop also included promising practices from other organizations and sessions dedicated to accessibility and adaptation for different profiles. To supplement this, UNHCR developed checklists and guiding documents to assist in their process during and after the capacity-building session.

Strengths, challenges, and lessons learned

The workshop received positive feedback and promoted the sharing of promising practices among organizations, along with fostering important discussions regarding PSEA. While the workshop was designed based on experiences and resources from different organizations, including [UNHCR's AAP Operational Guidance](#), it was noted as a gap that there is no comprehensive guidance for developing and implementing a feedback and complaints mechanism, neither with UNHCR or at interagency level. There is also no standard facilitation package to train partners on this. Other lessons learned was that a full two-day training is necessary (as the initial one-day format was insufficient for the participants, leaving many practical questions unanswered) and that, while designed for local organizations, it also piqued the interest of UN Agencies and INGOs that manage local partners and are grappling with similar issues. While the workshop was an important step forward, continued one-on-one support will be needed to address the specific needs of each organization.



Practice #10: Collaboration with national civil protection (UNHCR and UNICEF Italy)

Background

As of June 2023, more than 92,000 Ukrainian refugee women had arrived in Italy and almost 50,000 Ukrainian children. Despite the notable commitment of national authorities in setting up mechanisms to identify and assist people fleeing from Ukraine, some challenges in the reception system persisted, such as overcrowding, mixed-gender facilities, limited privacy, inadequate information and lack of systematic referrals and access to specialized services (including GBV and trafficking). While home and community-based hosting are considered as good practices, such arrangements also raised concerns around potential GBV and SEA, in particular in the absence of clear regulations and minimum requirements, monitoring, and safe complaint and reporting mechanisms. Many who were hosted in informal community-based accommodations were also left without assistance. These factors further aggravated the risks facing refugee women in Italy, where, notably, Ukrainian women represent one of the groups of women who are reported to be most exposed to physical or sexual violence.

Actions taken

Against this backdrop, UNICEF, UNHCR and the Italian Civil Protection jointly developed a [Toolkit \(Practical Guide\)](#) for risk mitigation in the widespread reception system in May 2023. The Guide aims to support authorities and civil society actors managing reception to integrate PSEA, child protection and the prevention of GBV into their work, with a main focus on risk mitigation. It provides both a theoretical framework and a set of practical tools and will be further disseminated, complemented by support to selected actors for development of internal tools, webinars for focal points in the widespread reception system, and the development of an e-learning on risk mitigation.

Strengths, challenges, and lessons learned

The Guide was deemed as a best practice by the Italian Civil Protection, whose ownership of the document provided it with legitimacy at the institutional level. Furthermore, the Guide has been well received by civil society both thanks to the consultative process of drafting, which incorporated civil society and experts' inputs, and due to its operational approach, which provides practical and concrete tools to tackle GBV and SEA. The main challenge in this work was to identify focal points among the numerous civil society organisations involved in reception, and to ensure continuity. While currently only applicable to widespread reception, UNHCR will also seek to advocate for the adoption of the Guide in ordinary reception system in Italy. The Guide will also be translated to English.



Toolbox of key resources



Practice #1 Promoting responsible volunteerism

Vetting and registration of volunteers and volunteer organisations supporting the Ukraine refugee response:

- [English](#)
- [Hungarian](#)
- [Polish](#)

Dos and Don'ts for Volunteers:

- [English](#)
- [Hungarian](#)
- [Polish](#)
- [Romanian](#)
- [Russian](#)
- [Slovak](#)
- [Ukrainian](#)

Code of Conduct:

- [English](#)
- [Hungarian](#)

11 Key Safeguarding Messages:

- [English](#)
- [Hungarian](#)

Volunteer Undertaking:

- [English](#)



Practice #2: Working with refugee-led organisations on PSEA

- UNHCR Stay Safe campaign. [Link](#)
- ‘Sme Spolu’ information page. [Link](#)
- IASC Rules of Sexual Conduct for Humanitarian Workers in plain language. [Link](#)
- ICVA/UNHCR Interagency Community Outreach and Communication Fund. [Link](#)



Practice #3: Enhancing partner capacity in SEA investigations

- Thematic Brief: Resources and opportunities to enhance investigation capacity into allegations of sexual exploitation and abuse in the Ukraine refugee response. [Link](#)



Practice #5: Strengthening UNHCR’s organizational culture

- Facilitators Guide ‘Values, attitudes and organizational culture’. [Link](#)



Practice #6: Promoting on-line safety for refugees

Safe Online: A guide to be protected on the internet:

- [English](#)
- [Ukrainian](#)



Practice #8: Integrating PSEA in the work to enhance Refugee Accommodation Centers

- SEA Risk Assessment - Observational Checklist (Sample used for RACs in Moldova) [Link](#)



Practice #9: Supporting partners to strengthen their complaint and feedback mechanisms

- UNHCR’s AAP Operational Guidance. [Link](#)



Practice #10: Collaboration with national civil protection

- UNICEF, UNHCR and the Italian Civil Protection Toolkit (Practical Guide) for widespread reception (Italian). [Link](#)

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