

Approved:

President of the
International Charitable
Foundation

“Caritas Ukraine”
T. Stavnychy
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(date)

*Seal: International Charitable Foundation “Caritas Ukraine”
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**IMPARTIALITY, EQUALITY, AND INCLUSION POLICY
of the International Charitable Foundation “Caritas Ukraine”**

1. Purpose

- 1.1.** The International Charitable Foundation “Caritas Ukraine” (hereinafter - “**Caritas Ukraine**”) respects and values the dignity and rights of every person, strives to apply fair and inclusive approaches based on the principles of the Social Doctrine of the Catholic Church, compliance with the Universal Declaration of Human Rights, and the Constitution of Ukraine. Caritas Ukraine recognizes that the uniqueness of each person in various ways is a valuable resource that enriches our organization, communities, and society.
- 1.2.** The Impartiality, Equality, and Inclusion Policy (hereinafter - “**Policy**”) has been developed to support a safe and inclusive environment within the Caritas Ukraine network as well as:
- defines the principles of impartiality, equality, inclusivity, and expectations regarding them;
 - establishes Caritas Ukraine's commitment to creating a working and organizational space based on these principles;
 - is based on the identity, values, and principles of Caritas Ukraine as defined in the Code of Ethics and Conduct.
- 1.3.** The availability of practices of impartiality, equality, and inclusivity allows Caritas Ukraine to: better understand the people and communities with whom Caritas Ukraine member organizations collaborate; develop and implement accessible and inclusive projects and programs; engage diverse teams; counteract discrimination and harassment, and thus effectively support and develop a safe and respectful internal organizational culture.
- 1.4.** The policy has been developed in accordance with the Charter of Caritas Ukraine, the policies and procedures of the Safeguarding System of Caritas Ukraine Network, other internal documents, and the current legislation of Ukraine, in particular, but not limited to, the Constitution of Ukraine, the Labor Code of Ukraine, the Law of Ukraine “On the Principles of Prevention and Combating Discrimination in Ukraine,” the Law of Ukraine “On Ensuring Equal Rights and Opportunities for Women and Men,” and relevant international standards.

2. Definition of terms

- 2.1.** The terms used in this Policy shall have the meanings set forth in the Glossary (Appendix No.1).

3. Scope of application

3.1. The Policy applies directly to:

- 1) All personnel of Organizations Members of the Caritas Ukraine Network (all employees, management, Board members, interns, volunteers, students completing internships);
- 2) Affiliates who are involved in any way in the implementation of programs, projects, and activities of Organizations Members of the Caritas Ukraine Network (partner organizations and their personnel, project donors, consultants, contractors, and/or any other third parties, including foreign ones).
- 3) People in need/beneficiaries (individuals, groups, or organizations receiving charitable aid, including corresponding benefits, directly or indirectly, as part of the implementation of projects, programs, or events of Organizations Members of the Caritas Ukraine Network).

- 3.2.** The Policy applies anywhere and anytime, including during working hours and non-working hours (including vacations), at the workplace and outside of it, within Ukraine, and abroad.

- 3.3.** Organizations Members of the Caritas Ukraine Network approve their own Impartiality, Equality, and Inclusion Policies, which must be consistent with this Policy. In the absence of their own Impartiality, Equality, and Inclusion Policy, when implementing programs and

projects in cooperation with Caritas Ukraine, Organizations Members of the Caritas Ukraine Network undertake and guarantee compliance with this Policy.

- 3.4.** Caritas Ukraine cooperates with Personnel and Affiliates who similarly respect the safety, dignity, and rights of all people, and who appropriately prevent any violations of this Policy, in accordance with the established procedure. Any persons with whom Caritas Ukraine enters into employment and/or contractual relationships are required to comply with this Policy.
- 3.5.** If the agreement with the donor organization stipulates higher standards for the protection of internationally recognized human rights, the Personnel involved in the implementation of such a project/program are required to comply with the terms and conditions set forth in the relevant agreement.

4. Obligations of Caritas Ukraine

- 4.1.** Caritas Ukraine respects the dignity, rights, and diversity of its personnel, affiliates, and people in need (beneficiaries) and undertakes to:
- respect, protect, and promote human rights recognized by Ukrainian law and international standards for all without discrimination;
 - integrate principles of equality, impartiality, and inclusivity into daily work, relationships, and practices.

5. Principles of impartiality, equality, and inclusivity

- 5.1.** Guided by the values and principles set out in the Code of Ethics and Conduct, Caritas Ukraine focuses on the dignity, needs, and rights of all people without prejudice or discrimination.

5.2. 1) Impartiality principle of recognizing, accepting, and respecting differences between people in terms of race, skin color, political, religious, and other beliefs, gender, age, disability, ethnic and social origin, citizenship, family and property status, place of residence, language, or other characteristics that exist are, and may be, real or perceived. Caritas Ukraine recognizes and adheres to the principle of impartiality, which promotes social cohesion.

5.3. 2) Equality principle that means creating equal conditions for access to resources, opportunities, education, work, and participation in public life for all people, taking into account their equal dignity, value, and rights regardless of their characteristics or status.

5.4. 3) Inclusivity principle of ensuring the full participation of all people, including vulnerable groups, in social, economic, and cultural life on equal terms. It involves removing barriers and creating an environment where everyone feels accepted and has the opportunity to develop.

6. Prohibition of discrimination

- 6.1.** Caritas Ukraine recognizes that all individuals and/or groups of individuals, regardless of their specific characteristics, have equal rights and freedoms, equality before the law, respect for their dignity, and equal opportunities.

- 6.2.** Any discrimination and harassment based, in particular, but not limited to, characteristics such as race, skin color, political and religious beliefs, gender, age, health status, disability,

ethnic and social origin, citizenship, lifestyle, marital status, financial status, place of residence, language, etc.

6.3. Caritas Ukraine has a zero-tolerance policy towards any form of discrimination, bullying, stalking, or harassment.

7. Goals and objectives for applying the principles of impartiality, equality, and inclusivity

7.1. Caritas Ukraine has set the following goals to ensure impartiality, equality, and inclusivity:

- 1) creating and maintaining a safe and inclusive working environment based on dignity, integrity, trust, and mutual respect, providing equal opportunities and promoting the development of all personnel, without prejudice or discrimination;
- 2) counteracting discrimination, bullying, harassment, and other violations of the Safeguarding System;
- 3) ensuring barrier-free and equal access to Caritas Ukraine projects and programs for all people in need (beneficiaries), taking into account vulnerability criteria and standards for providing assistance in project activities;
- 4) providing support to vulnerable and marginalized individuals and groups to promote their empowerment and development, as well as informing them about the activities of the network's organizations.

7.2. The key objectives regarding the personnel of Organizations Members of Caritas Ukraine Network:

- ensure equal access to employment, training, development, and career advancement opportunities without discrimination or prejudice on any grounds;
- implement inclusive recruitment procedures, create conditions and provide equal opportunities for employment and volunteering for people of different genders and ages, as well as for people with disabilities, war veterans, etc.
- ensure equal pay for identical work with the same qualifications and under the same working conditions for all persons through transparent personnel policies and audits;
- ensure equal opportunities for mothers and fathers raising children, in accordance with the current legislation of Ukraine;
- develop a safe and accessible environment for people with disabilities (improving the accessibility of premises, communications, information materials, accessibility audit);
- ensure freedom of religion for personnel, including the prohibition of all forms of discrimination based on religious beliefs, the inadmissibility of coercion to participate in religious ceremonies, and condemnation for non-participation in them (clause 8.1.6. of the Code of Ethics and Conduct);
- take effective measures to prevent and combat discrimination, bullying, harassment, and other violations of the Safeguarding system against employees and volunteers of the network;
- ensure systematic training of personnel on safeguarding issues, as well as the protection of children and vulnerable adults;
- promote awareness of impartiality, equality, and inclusivity among network personnel.

7.3. Key objectives of project and program activities:

- ensure that vulnerability and discrimination risk analyses are included in all projects of Organizations Members of Caritas Ukraine Network;
- take into account the needs of target groups (people with disabilities, people of different ages and genders, etc.) and intercultural diversity in all Caritas Ukraine programs;
- develop and implement standards for inclusive provision of social services and charitable aid;

- ensure physical, informational, and communicational accessibility of all services and aid provided in the network, and take these indicators into account when planning and implementing projects;
- ensure the participation of beneficiaries in the planning and evaluation of projects and programs;
- take into account the cultural context and gender and age distribution when planning and implementing measures, projects, and programs;
- ensure the recognizability of network employees and volunteers when visiting people in need (beneficiaries), which may include the use of easily recognizable clothing and accessories with the logos of organizations members of network;
- inform all project and program participants about their rights in accordance with the law, in particular the Law of Ukraine “On Ensuring Equal Rights and Opportunities for Women and Men”;
- conducting safety briefings in accordance with the Policy and Procedures for the Protection of Children and Vulnerable Adults.

7.4. Key communication objectives:

- ensure the use of sensitive and non-discriminatory language in all external and internal communications of Organizations Members of Caritas Ukraine Network;
- consider the representation and non-stereotypical portrayal of people in visual content;
- when creating informational materials, take into account the needs of people with visual and/or hearing impairments, adapt them according to the age and abilities of users (providing sign language interpretation, subtitles, and other accessible forms of information presentation);
- conducting information campaigns to highlight the results of implementing the principles of impartiality, equality, and inclusivity in the network's work, as well as promoting them among the general public.

8. Breach of Policy

8.1. Any behavior that creates a threatening, hostile, or humiliating atmosphere for staff, people in need (beneficiaries), and affiliates is considered a breach of this Policy, primarily all forms of discrimination, bullying, harassment, and persecution. All violations of this Policy are considered breaches of the Safeguarding System and are grounds for disciplinary action.

9. Reporting of breach

9.1. Personnel and affiliates are required to report any reasonable suspicions and/or facts of Safeguarding system breaches within 24 hours of becoming aware of or should have become aware of such abuses through the established feedback channels:

✓by e-mail: feedback@caritas.ua;

✓via the online form on the Caritas website;

✓by calling the Caritas hotline;

✓in person to the Person Responsible for Implementation of the Security System (PRISS).

9.2. Reports of breaches of this Policy will be handled in accordance with Procedure for Handling Sensitive Appeals and Providing Feedback in the Caritas Ukraine Network.

10. Protection of whistleblowers

10.1. Caritas Ukraine prohibits the use of repressive measures against any person who has reported a suspicion or breach of this Policy. Discrimination, bullying, or persecution of a person who has reported a suspicion or breach of this Policy is strictly prohibited. Any person who has reported a suspicion or breach of this Policy and who has been subjected to repressive measures, discrimination, bullying, or persecution in connection with this must report the

breach of the Safeguarding System through the feedback channels in accordance with section 9.1 of this Policy.

11. Data protection and confidentiality

11.1. Personnel and affiliates are required to ensure the protection and confidentiality of all information about people in need (beneficiaries) in accordance with the requirements of Ukrainian law, the Privacy and Personal Data Protection Policy, and the Safeguarding Policy.

12. Responsibility

12.1. All persons working in Organizations Members of the Caritas Ukraine Network, especially managers, are responsible for complying with the provisions of this Policy.

12.2. In case of detected breaches of the Policy requirements, the personnel shall be held liable in accordance with the Charter, policies and procedures of the Safeguarding System, internal documents of Caritas Ukraine, and the norms of the current legislation of Ukraine. Proven conscious and deliberate violation of the provisions of this Policy by personnel is grounds for disciplinary liability, as provided for by the Labor Code of Ukraine and the Internal Labor Regulations of Caritas Ukraine.

13. Final provisions

13.1. The Policy shall be reviewed and updated at least once every two years. All changes and additions to the Policy shall be made by publishing a new version of the Policy. Once the new version of the Policy has been approved, the previous version shall cease to be valid.

13.2. Once approved, this Policy shall be made available to all persons who are members of personnel as of the date of approval. In order to promote awareness and understanding among all interested parties, the Policy shall be made publicly available on the Caritas Ukraine website.

13.3. This Policy is inextricably linked to other Caritas Ukraine policies, in particular the policies and procedures of the Caritas Ukraine Safeguarding System.

13.4. This Policy shall take effect on the first day of the month following the month in which it was approved.

Glossary

1. Disability-free principle that the environment, services, information, and transportation are accessible to all people, regardless of age, gender, or health status. This is a key component of creating an inclusive society.
2. Vulnerable groups individuals or groups who are at increased risk of discrimination, exclusion, or violence due to social, economic, or physical factors.
3. Human dignity fundamental principle that recognizes that human beings are created in the image of God and have intrinsic value, regardless of their social or physical status. This is the main basis for all Caritas activities. The right to respect for human dignity is guaranteed by the Constitution of Ukraine.
4. Discrimination situation in which a person and/or group of persons, based on their race, skin color, political, religious, and other beliefs, gender, age, disability, ethnic and social origin, citizenship, family and property status, place of residence, language, or other characteristics that were, are, or may be, real or presumed, is subject to restrictions in the recognition, exercise, or enjoyment of rights and freedoms in any form established by Ukrainian law and internationally recognized standards.
5. Disability discrimination any distinction, exclusion, or restriction on the basis of disability which has the purpose or effect of impairing or nullifying the recognition, enjoyment, or exercise, on an equal footing, of all human rights and fundamental freedoms in the political, economic, social, cultural, civil, or any other field. It includes all forms of discrimination, including denial of reasonable accommodation¹.
6. Gender discrimination situation in which a person and/or group of persons on the basis of gender, which were, are, and may be real or presumed, are subject to restrictions in the recognition, exercise, or enjoyment of rights and freedoms or privileges in any form established by the Law of Ukraine “On the Principles of Prevention and Combating Discrimination in Ukraine,” except in cases where such restrictions or privileges have a legitimate, objectively justified purpose, the means of achieving which are appropriate and necessary².

¹ UN Convention on the Rights of Persons with Disabilities dated 13.12.2006, ratified by Ukraine on 16.12.2009 (date of entry into force: 6.03.2010).

² Law of Ukraine No. 2866-IV dated 08.09.2005 “On Ensuring Equal Rights and Opportunities for Women and Men”

7. Accessibility removing physical barriers and, conversely, creating conditions in which every person feels comfortable in a given space. Full accessibility means that a person can use the surrounding space independently, i.e., without outside help. Accessibility is not only architectural, but also informational.
8. Accessibility in communications includes the use of languages, texts, Braille, tactile communication, large print, accessible multimedia, as well as printed materials, audio aids, plain language, readers, and augmentative and alternative communication methods, modes, and formats, including accessible information and communication technology.³
9. Disability result of interaction between persons with persistent health impairments and various barriers (physical, social, informational, behavioral) that prevent their full and effective participation in society.⁴
10. Inclusion process of ensuring the full participation of all people, including vulnerable groups, in social, economic, and cultural life on an equal basis. It involves removing barriers and creating environments.
11. Non-discriminatory (sensitive) language language that respects the dignity of every person, does not contain prejudices, stereotypes, or terms that devalue.
12. Equality principle that means creating equal conditions for access to resources, opportunities, education, work, and participation in public life for all people, taking into account their equal dignity, value, and rights regardless of their characteristics or status.
13. Impartiality principle of recognizing, accepting, and respecting differences between people in terms of race, skin color, political, religious, and other beliefs, gender, age, disability, ethnic and social origin, citizenship, family and property status, place of residence, language, or other characteristics that were, are, or may be real or presumed. Caritas Ukraine recognizes and supports the principle of impartiality, which promotes social cohesion.

³ UN Convention on the Rights of Persons with Disabilities of 13.12.2006, ratified by Ukraine on 16.12.2009 (date of entry into force: 6.03.2010)

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