Consultancy for the elaboration of a "Duty of Care" package for local humanitarian responders in Ukraine

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Report

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List of Acronyms

CEDEM	Centre for Democracy and Rule of Law
CINFO	Swiss centre of competence for international cooperation
CSO	Civil society organisation
DoC	Duty of Care
EDD	Enhanced due diligence
EISF	European Interagency Security Forum; since 2020, Global Interagency Security Forum (GISF)
FGD	Focus group discussion
HCT	Humanitarian country team
HOPC	Humanitarian Operational and planning cell
IFAK	Individual first aid kit
INGO	International non-governmental organisation
INSO	International NGO Safety Organisation
KI	Key informant
KII	Key informant interview
MHPSS	Mental health and psychosocial support
NGO	Non-governmental organisation
NNGO	National non-governmental organisation
NP	Nonviolent Peaceforce
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
PFA	Psychological first aid
PIN	People in Need
PPE	Personal protective equipment
PSEA	Protection from sexual exploitation and abuse
PSS	Psychosocial support
RCC	Relief Coordination Centre
SESU	State Emergency Service of Ukraine
SSA	Sustainable settlement assessment
ToR	Terms of reference
UHF	Ukraine Humanitarian Fund
VO	Volunteers' organisation

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1 Executive summary

The report outlines a comprehensive review commissioned to enhance the "Duty of Care" (DoC) standards for local humanitarian responders in Ukraine, particularly in the light of the ongoing Russia-Ukraine war and the absence of deconfliction measures between the parties able to guarantee their safety and protection. The initiative, driven by Swiss Agency for Development and Cooperation, the Humanitarian NGO Platform in Ukraine, and the Alliance of Ukrainian Civil Society Organisations (Alliance UA CSO), aims to establish a response-wide accepted DoC package that can be integrated into donor budgets and enhance the safety and well-being of local humanitarian workers and volunteers.

The methodology involved extensive interviews and focus group discussions with various stakeholders, including donors, international NGOs (INGOs), national NGOs (NNGOs), volunteers' organisations and representatives of civil society organisations (CSOs), to gather insights on current practices and challenges related to DoC. The report defines DoC as a moral or legal obligation to ensure the safety of personnel from physical and mental harm, emphasising the need for a common understanding and implementation of safety standards among humanitarian actors in Ukraine.

Key findings reveal significant gaps in the existing regulatory framework, as Ukraine lacks specific legislation on DoC, relying instead on broader labour protection laws. The report highlights the challenges faced by local responders, including inadequate access to personal protective equipment (PPE) and insurance, which are crucial for their safety during humanitarian operations.

The proposed minimum DoC package includes essential elements such as insurance for staff and volunteers, psychosocial support (PSS), first aid training, and the provision of PPE. Additionally, the report recommends capacity-building initiatives to ensure that local organisations are equipped to implement these measures effectively.

The report concludes with recommendations for improving funding mechanisms, enhancing information sharing among humanitarian organisations, and fostering partnerships that leverage local knowledge and international expertise. It emphasises the importance of harmonising DoC standards across the humanitarian community to ensure the safety and accountability of those risking their lives to aid others in Ukraine.

2 Introduction

Swiss Agency for Development and Cooperation, the Humanitarian NGO Platform in Ukraine and the Alliance UA CSO have commissioned an external review to improve minimum safety standards for humanitarian workers and volunteers. Given that the majority of humanitarian activities are carried out by local responders, including especially in hard-to-reach areas along front line and borders the aim of the present work is to prepare the ground for a common understanding on a minimum DoC package for local organisations that donors and international organisations would accept in their budgets. The definition and scope of this package should be reviewed and discussed by the humanitarian community in Ukraine.

The review should also contribute to increasing stakeholders' understanding of a common definition of "Duty of Care", common standards, practices, and ultimately to enhancing accountability, risk-sharing, safety, security and well-being of local responders, and the Government of Ukraine has considered the possibility of standardising it at the state level.

From the beginning of our work, it has appeared that the scope of the review has progressively broadened, since DoC embraces various activities and practices.

We sincerely hope that this document will help the humanitarian community and all necessary stakeholders to take some steps forward in improving DoC practices for the benefit of those who risk their lives to help others in frontline regions.

We would like to thank all those who responded to our interviews for their openness and congratulate all those who do such vital work in support of affected populations.

3 Methodology and approach

3.1 Methodology and tools

After an inception meeting carried out with the Swiss Agency for Development and Cooperation staff in Kyiv and leaders of the Alliance UA CSO and the Humanitarian NGO platform in Ukraine, we have conducted a desk review of documents and reports related to the topics to be analysed.

We then started a round of semi-structured in-person and online interviews. Direct interviews have been carried out in Kyiv, Kharkiv, Mykolaiv and Dnipro cities.

Focus group discussions have been conducted, one with volunteers' organisations representatives group and one with the humanitarian donors' core group.

Globally, we have reached the following categories and number of respondents:

	People interviewed	Organisations
DONOR	11	8
INGO	13	5
NNGO	19	11
UN	5	2
Volunteers' organisation	7	5
TOTAL	*55*	*30*

3.2 Duty of Care definitions

In our review, we have adopted the following DoC definition: "A moral or legal obligation to ensure that staff are safe from physical or mental harm". We have applied this definition to the context of humanitarian aid in Ukraine.

As there is no specific legislation on DoC in Ukraine, we have excluded the widely used definition found in UN documents, given that it is limited to mandatory legal obligations: "A non-waivable duty to manage foreseeable risks that may harm or injure our personnel and eligible family members in the line of duty".

In Ukraine, there is a growing concern, as noted in the ToR for the Consultation, that humanitarian actors should: make every effort to lower risks and improve local partners' safety, security, and mental health through fair partnership and joint-risk sharing approaches. Therefore, DoC should be applied beyond an organisation "own" staff and downstream to implementing partners.

This responds to an ethical rather than a strictly normative approach, also considering that improvements in safety and security practices can contribute to localisation and ultimately to increased humanitarian aid effectiveness. Therefore, despite not having legal obligations in Ukraine, there is a widespread consensus that substantial progress in DoC for local humanitarian responders is needed, including the setting up of commonly agreed minimum standards and advocating for these standards at the state level. Furthermore, DoC should be applied beyond an organisation "own" staff and downstream to implementing partners.

DoC embraces several aspects, such as the duty to provide a safe working environment; active protection of personnel through risk assessment and mitigation measures; fair employment contracts that take due account of the specific nature of the risks associated with the particular work context; providing personnel with adequate information about the potential hazards to which they may be exposed; the duty to provide personnel with medical services and insurance policies, particularly in the event of an incident, and to take the necessary measures to ensure the well-being of the staff;

providing personnel with adequate training and the necessary equipment to carry out the tasks safely[1].

The concept also relates to the division of roles and responsibilities within an organisation to define who should do what regarding safety and security measures (triggers and "security tree") and who should be held accountable if an incident happens.

Finally, it is worth mentioning that EISF and CINFO have developed a DoC maturity model[2] meant to indicate what safety and security risk management processes NGOs have to put in place in order to improve the safety and security of their staff. The model can also be applied to the Ukrainian context to assess what safety and security risk management processes need to be set up within an organisation in order to make progress toward a certain level of 'maturity' four overarching duties: 1) duty to inform, 2) duty to prevent, 3) duty to monitor, and 4) duty to intervene[3].

4   Findings

4.1   Duty of Care regulatory framework in Ukraine

In Ukraine, there isn't a specific legislation on DoC. The relevant provisions are contained in the Labour Code of Ukraine and the Laws of Ukraine "On labour protection" and "On mandatory state social insurance".

In some documents of NGOs working in Ukraine (KII 42) we have found a literal translation of the expression "Duty of Care" such as "обов'язок належної турботи" ("duty of due care"), "політика піклування" ("policy of care") or "політика першої турботи" ("policy of first care"). (KII 43, KII 44) However, when talking about DoC issues, many informants refer generically to "security" ("безпека"), taking in account that Ukrainian – as in Latin languages – safety and security are merged into one term.
Following own research and consultations, we suggest adopting the following translation of DoC: "обов'язок турботи" [oboviazok turboty].

Nevertheless, according to the law, all employees are subject to mandatory state social insurance against accidents at work and occupational diseases that have caused the loss of working capacity (Law of Ukraine "On labour protection", Art. 5 (4)). The legislation allows additional guarantees for employees subject to agreements under the employment contract.

The activities of volunteers are regulated by the Laws of Ukraine "On volunteering", "On charitable activities and charitable organisations" and "On public associations".

Ukrainian laws do not have a definition of "civil society organisation". CSO is used as a general concept, but for the purpose of the registration of NGO and CSO, there are such options:

   a)   public association;
   b)   charitable organisation.

Employees of both types of organisations are subject to labour legislation, mandatory state social insurance and social security in contrast with the relationship between volunteers and an organisation, where there are no such obligations. Similarly, staff employed as "service providers" (qualified as "individual entrepreneurs") are not subject to the provisions of the labour law.[4]

Both are non-profit legal entities and can involve volunteers. However, 'volunteer organisations' are not legal entities.[5]

Volunteering, as defined by the specific law, is a type of charity, considered a voluntary, socially oriented, non-profit activity carried out by volunteers (Art. 1). Free performance of work or provision

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[1] Andrea de Guttry, 2018.

[2] CINFO/EISF, 2018.

[3] The self-assessment can be carried out online at this website: https://dutyofcare.cinfo.ch/.

[4] In this document, we use the term "staff" to refer to people who work with an organisation on a regular basis and receive payment for their work, as opposed to volunteers who may receive reimbursement or a stipend to cover their expenses.

[5] In this document, we refer to volunteer organisations when a registered organisation is made up entirely of volunteers or is mainly run by volunteers with limited staff (less than 5 people).

of services by persons based on family, friendship or neighbourhood relations is not considered as volunteering activity.

There is no legal requirement for an organisation's statutory documents to include DoC provisions for the safety of volunteers.

Organisations may issue certificates (IDs) to volunteers and eventually insure their life and health while performing volunteer tasks. Provisions regarding insurance may be included in the volunteering agreement between the organisation and the volunteer (Art. 5 (2)) but it is not mandatory.

Volunteers may be reimbursed for expenses (for example, for business trips, food, obtaining visas, telephone services or mail, vaccinations, etc.) (Art. 11).

The law "On volunteering" (Art. 6) stipulates that in the event of the death of a volunteer or his mutilation (contusion, injury), which occurred in connection with the events of the armed aggression of the Russian Federation against Ukraine, she/he (or a family member – in case of death) is entitled to compensation from the state budget.

However, less than ten payments have been made between February 2022 and August 2024[6].

This confirms the statements of our key informants (KII 12, KII 13, KII 43, KII 44): it is practically impossible to get compensation since it is very difficult to obtain a report from military authorities regarding incidents occurred to individuals[7].

4.2   Duty of Care best practices in Ukraine

It should be noted that the following description of best practices is not intended to be exhaustive and is based on the findings gathered from the sample of organisations that were interviewed.

PPE lending

According to the INGO *Nonviolent Peaceforce* (NP): "Local organisations and volunteers are the backbone of the Ukrainian humanitarian operators, but they cannot do their work effectively without proper protection. Local aid organisations and volunteers, however, have limited or no access to adequate PPE. For local volunteers, purchasing a kit of PPE that costs an average of $450 to $1,000 has been largely impossible. With the international community still unwilling to fully or directly fund local volunteer organisations, these groups often prioritise spending their limited funds on fuel for the distribution of humanitarian aid for others over safety items for themselves."[8]

This is in line with some of the statements made by key informants:

"We don't have enough *bulletproof vests for everyone, so when we travel close to the front we have an agreement that women wear vests, men go without vests." (KII 21, KII 22)*

"Participation in evacuation or missions near the front line takes as many employees as there are bulletproof vests," (i.e. the number of people who can be involved in missions is limited due to the lack of vests). (KII 17, KII 18)

As a coping mechanism due to lack of funds, we found that an organisation occasionally cooperates with the national police in order to borrow armour plates and use them in their vests. (KII 49) They purchase the textile part of the vest and insert the borrowed plates inside when needed.

In order to overcome the lack of safety backstops, inclusive of equipment of local organisations, several organisations have tested a fairly successful project of PPE (ballistic vests and helmets) lending to partner organisations.

In 2022, NP launched a PPE Lending Programme to help volunteers and first responders operate more safely. The programme is working in all NP operational sites and has been enhanced in 2023/2024 by increasing the quantity of PPE available to partners.

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[6] Data obtained through a request to the Ministry of Veterans Affairs that is in charge of paying compensations, according to the Decree of the Cabinet of Ministers of Ukraine dated August 19, 2015 No. 604.
[7] A more detailed description of the regulatory framework can be found in Annex 4.
[8] https://nonviolentpeaceforce.org/uk/community-protection-lending-a-hand-lending-a-bulletproof-vest/

At the NNGO Relief Coordination Centre (RCC), PPE is delivered to volunteers at their request if they are to carry out humanitarian missions in dangerous areas. This can be both densely mined territory and territory near the frontline or in settlements close to the front line.

Generally, PPE can be lent:

- for a given period, for example, up to six months with an interim check after three months (KII 24). While in some cases, although PPE is provided temporarily, in fact, the equipment remains with the organisation since they need it permanently (KII 14, KII 29, KII 30, KII 31);
- for the duration of a specific project (KII 14, KII 29, KII 30, KII 31).

The lending mechanisms on one side ensure quick availability of the equipment according to needs of small local organisations that cannot access directly donor funding and on the other side the large organisations lending the equipment ensure accountability according to certain rules established in the lending contract.

According to their websites and interviews, other INGOs such as *CARE*, *PIN*, *World Vision* and *Mercy Corps* have also transferred PPE to their local partners as part of their humanitarian activities. However, despite the fact that a considerable amount of equipment has been distributed since the start of the full-scale invasion, some of the respondents stated that the needs of local responders are far from being met. (KII 17, 18, 21, 22, 49)

Insurance schemes

International partners, including the SDC and OCHA, provided funding for structured health, disability and life insurance coverage for volunteers engaged in hazardous activities such as evacuations and frontline aid delivery.

The Swiss funded pilot project was implemented first by RCC and later by NP, each using a distinct approach tailored to the specific needs of their regions and local partner organisations.

RCC in Kharkiv and Zaporizhzhia focused on providing insurance to a wide range of organisations in their target oblasts (i.e. regions), especially those who lack sustainable funding.

NP integrated insurance within a broader DoC package for their partners, offering additional support like protective equipment and psychological services as part of the Volunteer resilience programme.

The volunteer insurance programme was generally well-received by the participants, who appreciated the added sense of security it provided, knowing that they were protected in case of unforeseen events during their work.

Additionally, the procedure to obtain a reimbursement from the insurance is lean. Insurance companies pay based on receipts issued by medical services. They have appointed a focal point within the insurance in charge of facilitating the process. (KII 23)

As is the case for the PPE lending mechanisms, the insurance scheme allows small organisations to benefit from insurance services through the intermediation of a larger organisation ensuring accountability toward the donors. However, in this pilot phase the insurance has been provided only to volunteers, leaving the staff of some local organisations deprived of the access to this benefit.

On September 13, 2023, the Verkhovna Rada (Parliament of Ukraine) registered the draft law No. 10040 "On Amendments to the Tax Code of Ukraine regarding the support of volunteer activities under martial law".

Once approved, the legislation will exempt non-profit organisations from taxation for the life and health insurance of volunteers. These taxes are now mandatory.

According to CEDEM: "This is a very important initiative, which in the near future, subject to its approval, will allow the launch of large life insurance projects for volunteers in the eastern and southern regions of Ukraine"[9].

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[9] https://cedem.org.ua/news/strahuvannya-volonteriv-zminy/

Relief Coordination Centre Duty of Care practices

RCC works in the Zaporizhzhia and Kharkiv regions with more than 700 different organisations, and is responsible for organising and coordinating the actions of humanitarian missions and organisations. RCC provides actual information, which the team collects and analyses on a daily basis. This makes possible to effectively distribute the resources received from donors, coordinate efforts to fill gaps and avoid duplications of assistance and ensure a timely response to needs.

The Centre constantly cooperates with local and national non-governmental organisations and work in close coordination with the State Emergency Service of Ukraine (SESU), the Department of Civil Defence to ensure rapid response to emergency situations, local self-government bodies to collect data on current needs and with foundations to find the necessary resources.

For their partners RCC provides a platform that collects monthly data on problems and needs at the settlement level (sustainable settlement assessment (SSA)); an interactive map[10] as a tool that helps the charitable sector to assess the coverage of the residents of the Kharkivska oblast with basic needs; a list of contacts of responsible persons and their positions at the level of each settlement, which help representatives of aid organisations to quickly collect the necessary information and agree on cooperation; access to training and equipment; insurance packages.

Taking into account the large-scale coordination work and the operation of a large quantity of data, the question of the information protection system is acute. (KII 12, KII 13)

Nonviolent Peaceforce Duty of Care practices

NP works to improve the security of local organisations and first responders, supporting them in continuing and expanding efforts to protect civilians in Ukraine.

This included providing local partners with life insurance, PSS, PPE (such as ballistic vests and helmets), individual first aid kits (IFAKs), funds for fuel, volunteer stipends and extensive protection training and access to safe accommodation.

The type of support is managed through robust partnership agreements and follows an in-depth due diligence process in order to ensure responsible partnership, financial literacy, institutional functioning of an organisation and the respect of humanitarian principles. Unregistered informal groups would not have the same access to the support.

People in Need Duty of Care package for partners

In June 2022, People In Need (PIN) introduced a general Duty of Care policy applicable to its employees. In 2023, PIN presented a policy that is focused on its partners, i.e. national CSOs working in Ukraine. This policy ensures that partnering organisations receive the necessary support in addressing various safety and security-related risks.

These risks may include: physical threats (sexual abuse, injury, death), mental health concerns (burnout, psychological trauma, depression), information and digital risks (unauthorised access to partners' data, including personal data of beneficiaries or other sensitive details).

The policy provides guidance on what constitutes a Duty of Care for partners and how PIN ensures and contributes to the safety and security of its partnering organisations.

Generally, a written Duty of Care policy can be considered as a good practice as it helps to solidify DoC and helps avoid ambiguity between partners.

SAVE PEACE IN UA

The NGO **SAVE PEACE IN UA** helps the regions around the city of Dnipro with evacuation, providing victims with housing and food. They offer an intensive training at the *Volunteer Institute* to strengthen the capacities of volunteer organisations from all over the country, registered since the beginning of the full-scale invasion of the Russian Federation into Ukraine. More than 100 public and charitable organisations gained knowledge about ways to attract funding for the implementation of planned

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[10] https://rcc-ua.org/en/kh/map

activities and increased the capacity of their organisations. Considerable attention is also paid to raising awareness among volunteers regarding safety and psychological issues.

In a **consortium with other organisations** (CSO *Communities*, CSO *Crisis Psychological Assistance for Dnipro and Dnipropetrovsk Oblast*), are implemented different projects:

- NGO *Space* with the aim of strengthening ties between public organisations regarding joint work on civilian and military aid with the involvement of at least 25 organisations that work in the Dnipropetrovsk region;
- *ProLIVE Space* in order to conduct various events and training programmes to improve the PSS of volunteers and war victims.

Other local practices

During our assessment, we found some smaller organisations, having a network of motivated volunteers, cooperating with local state authorities, which are capable of delivering aid up to the front line with the occupied territory.

They function with the support of several private foreign donors and self-financing activities from financial resources of their businesses. Since they would rather not have the burden of reporting according to donor's standards, they do not benefit from large humanitarian programmes and projects.

Volunteers and employees of these organisations have their established channels of receiving information for planning the time and routes for the help delivery, but they do not have a sufficient number of PPE to ensure the safety of team members. Skills acquired on how to behave near front line areas have been obtained from practice rather than from attending trainings.

Nevertheless, the scale of their activities is impressive given the relatively simple structure. They are capable of providing tailor-made assistance to the vulnerable people living in hard-to-reach areas close to the front line.

4.3 Gaps and needs

Legislation

In addition to the lack of legislation on DoC, there is no clear legal framework for evacuating the population from the most dangerous areas.

In accordance with the Law of Ukraine "On the legal regime of martial law" (Art. 8 (1.19)), in Ukraine or in some of its regions, where martial law has been imposed, the military command together with the military administrations may independently or with the involvement of executive authorities carry out the evacuation of the population in the event of an emergency or threat of an emergency, as well as from zones of armed conflicts (from areas of possible hostilities) to safe areas.

"Evacuation legislation was primarily drafted before the war, and therefore may not fully respond to the current context. Under existing evacuation legislation, there is no clear procedure on information sharing and coordination between authorities and humanitarian actors. Lacking legal certainty, humanitarian organisations often find themselves assuming additional responsibilities and risks."[11]

"According to Ukrainian legislation, …a mandatory evacuation of the general population or mandatory evacuation in a forced manner of children together with their legal guardians may be announced. In the former case, people can be de facto evacuated voluntarily, considering that they have a right to sign a waiver and refuse to evacuate. In the latter case, a child must be evacuated with at least one legal guardian (for example, one of the parents or grandparents)."[12]

Some informants also report that mandatory evacuation pushes some families to hide their children, which is increasing humanitarian risks. In fact, some people refuse to leave affected areas until the

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[11] Guidance on humanitarian evacuations of civilians in Ukraine with special considerations for children. Protection Cluster, Ukraine. July 2024, p. 3.

[12] Guidance on humanitarian evacuations of civilians in Ukraine with special considerations for children. Protection Cluster, Ukraine. July 2024, p. 9.

last moment, and some refuse to leave at all. This puts humanitarian workers at risk (KII 32, KII 47) as they either have to reach dangerous areas to evacuate people who previously refused to move, or deliver aid to those who want to stay despite the shelling. This is more frequent among elderly people who might have spent all their life in a house or village.

Generally, evacuations should be seen as an opportunity for safety. DoC also means ensuring that displaced people can access aid in safer areas, that in turn will reduce the number of visits to high-risk areas by humanitarian staff. (KII 6)

Finally, it has to be mentioned that the legislation on this matter is currently under review.[13]

Data collection and data protection

The process of carrying out comprehensive needs assessment may involve a long procedure that takes time (sometimes months), and the results obtained may not meet the current needs at the moment when the reports are delivered. (KII 27) Certainly, collecting data in the closest areas to the front line is often not possible or not advisable. As a coping mechanism, local organisations are collecting information directly from the Starosty, elected village officials responsible for liaison with amalgamated territorial community authorities and for representing village interests. Some organisations also have a Hotline that people might call to communicate their specific needs. Informational tools like those developed by RCC and REACH (sustainable settlement assessment tool) and IOM frontline monitoring could be more widely used in order to collect and analyse data more effectively.

While delivering aid, some donors and tax authorities require personal data of the beneficiaries (taxpayer identification number etc.). This increases the time the humanitarian team have to spend in the high-risk areas. In addition, some beneficiaries sometimes feel uncomfortable providing personal information. (KII 29, 30, 31)

Regarding sharing information on security incidents, the practice of including obligations to inform partners about incidents is beginning to spread. However, this applies only to those organisations that have included a provision for informing about incidents in their partnership agreements. Currently, there is no single unified mechanism to record incidents to humanitarian responders. INSO is recording data from the organisations that they are registered with them (197 INGO, 10 members of the Red Cross movement, 69 NNGO) although, INSO data collection does not rely not only on self-reporting.

The humanitarian access snapshot run by OCHA as well collects and provides data on incidents. Though, INSO and OCHA systems appear to be running in parallel.

Additionally, in Ukraine, some NGOs apparently fear that having security incidents will diminish their chances of getting funding and sometimes, it is unclear what constitutes an incident or the information is considered sensitive, such as someone experiencing acute stress or being a survivor of sexual harassment. We can therefore assume that the data collected is underestimating the real situation.

Finally, it has to be mentioned that with the emergence of coordination centres and other organisations that accumulate various resources, including information on local actors and volunteers, and distribute them among local organisations, there is a growing need for powerful databases and, consequently, procedures for protecting them against intrusion. (KII 6, 7, 12, 13, 27, 29, 48, 49)

Organisational aspects

Before the full-scale invasion (2022), only a few organisations were focusing on delivering humanitarian aid to the population affected by the war in the eastern parts of Donetska and Luhanska oblasts and the occupation of Crimea since 2014.

After 2022, due to the magnitude of the invasion's consequences, many local organisations working on development issues or human rights have shifted their focus on humanitarian aid. (KII 55)

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[13] Ukraine: Protection Cluster National meeting minutes - 14 August 2024 [EN/UK] - Ukraine | ReliefWeb

Additionally, thousands of citizens have spontaneously mobilised to support people in need. (KII 28) Many occasional helpers have evolved into volunteers working permanently in supporting either the population affected by the war or the military, or both at the same time. New CSOs/NGOs have been registered as well.

While the scale of this mobilisation is unprecedented in its motivations and dimensions, many individuals and organisations have started supporting others without having specific knowledge and skills on humanitarian principles, aid mechanisms and standards and have evolved according to a "learning by doing" modality.

Because of this background, some organisations do not have security protocols neither permanent staff assigned for safety and security. Apparently, many local organisations have adopted a rather horizontal management system whereby the responsibilities to carry out a risk assessment shift from one person to another according to the operations and decisions regarding how to implement field activities in dangerous areas are taken collectively rather than hierarchically.

Certainly, these modalities have proven to be efficient and effective on a small scale, operating with little bureaucracy. However, this has hindered the possibility of scaling up operations and, ultimately, has made access to funding problematic due to the lack of accountability procedures.

Additionally, the lack of a clear division of roles and responsibilities at organisational level makes it difficult to assess who is responsible in case of incidents and what should be done to mitigate the risks.

It is worth mentioning that, according to our informants, it is difficult to find security managers with the right skills and experience whenever needed, and having dedicated staff it is an additional financial burden.

Aid delivery mechanisms

Aid delivery modalities near the front line can have an impact on the security of humanitarian personnel.

Despite coordination efforts, there are still gaps in harmonising aid delivery. At hromada level, coordination is based more on personal contacts. (KII 23) There have been cases in which local organisations have taken the initiative of coordinating among themselves for distribution of water and found out that some localities were not covered with it. (KII 24) Coordination meetings at regional level are time-consuming and not necessarily cover all the details required for the operations. (KII 29, 30, 31) There are also challenging barriers in communication between international and local actors, including linguistic barriers. In some spheres, actors evolve in parallel. There are, for example, spontaneous initiatives of private companies not necessarily coordinated with humanitarian actors. (KII 47)

The "drop and go" approach adopted in convoys does not contribute to security (KII 21, 22, 23) in the sense that it concentrates people around the dropped deliveries, thereby increasing the risk of transforming the distribution gathering into a target.

Following the "do not harm" principles, humanitarian actors have to take in account that humanitarian convoys and missions have sometimes been hit by Russian Forces. In a war without deconfliction measures nor humanitarian corridors, it appears that the visibility of humanitarian agencies' logos doesn't protect against attacks.

There are also questions on how to critically analyse where to go, for what purpose and how to prioritise aid delivery. (KII 6) For example, it is questionable whether the reconstruction of houses in villages under shelling should be continued. Compared to the initial phase of the full-scale invasion, when the reaction of the population was to flee from the front line as far as possible within the country or even abroad, now there is a tendency to move from the evacuated areas, but as close as possible.

There is therefore the risk that the distribution of aid in zones that should be evacuated keeps the people in place or even attracts people back to dangerous areas. (KII 6) In this respect, strengthening information and coordination with the authorities that are planning for mandatory evacuations should be enhanced.

Language barriers

Some NNGOs feel uncomfortable when communicating with representatives of international organisations due to language barriers and the use of "jargon".

It should be part of the Duty of Care practices to consider that, when discussing security issues, the focus should be on whether the information can be clearly understood by NNGO's personnel.

Barriers to receiving psychological support

The practice of consulting a psychologist is not widespread in Ukrainian society. There is a stigma and resistance to access psychological practices, especially among men. Though, as a consequence of the war duration and its effects on mental health, the situation is rapidly changing.

Each of the respondents we interviewed emphasised the need and importance of the psychological component in projects. The majority highlighted that the need emerges but, particularly in local organisations, only a small number of people are seeking help from a specialist.

In order to understand which method is the most effective and optimal for maintaining the psychological health of volunteers and humanitarian workers, it is therefore necessary to consider the barriers to seeking psychological help.

According to a research carried out by *Gradus Research* Company and the Ministry of Health[14], the main barriers to seeking for a psychologist in Ukraine are the following:

- Ukrainians do not pay sufficient attention to their mental health;
- they are confident that they can manage on their own or with the help of loved ones;
- they think that it is expensive.

Additionally, it appears that, particularly male staff, tend to rely on negative coping mechanisms: "Many of our volunteers try to cope with stress with the help of alcohol" (KII 49) or "…sleeping pills" (KII 6).

Such barriers can be eliminated with time by raising awareness among humanitarian organisations' staff and volunteers about the need to take care of their mental health and providing them with opportunities.

Several KI have mentioned that burnout cases are increasing. Starting from the full-scale invasion, humanitarian responders have been working relentlessly to provide people in need with aid, sometimes in difficult situations. Since the war is now in its third year, the engagement and the emotional consequences of dealing with hard work and occasionally with traumatic experiences is paying a toll on mental health.

Some humanitarian operators are so much dedicated to their work and attached to their motivations that they operate without rest. Many volunteers describe feeling an adrenaline rush and exhilaration when they are involved in their volunteering activities. This provides a sense of purpose and a distraction from one's own problems, but the active phase is followed by a period of exhaustion that leads to emotional burnout and other chronic disorders. This can lead to extreme fatigue and burnout, not to mention that "stress provokes incidents." (KII 47)

Mobilisation campaign

Military mobilisation is also affecting humanitarian workers (KII 41) and it is affecting humanitarian operations: "We noticed more and more challenges to humanitarians related to mobilisation." (KII 47)

Mobilisation may affect organisations, especially male personnel, because they fear to be enrolled while going through check points; beneficiaries are afraid of providing personal data because they fear to be mobilised, and there was an actual incident in Dnipropetrovska oblast about mobilisation taking place during distribution of aid. (KII 32)

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[14] Mental health and the attitude of Ukrainians to psychological help during the war. *Gradus Research* Company. March 2024.

5 Assessment of feasible, response-wide minimal Duty of Care umbrella package for local humanitarian responders

5.1 Introduction to Duty of Care packages

Based on KII, FGD, donors' discussion and desk review, we received a large list of measures that, in the opinion of interested parties, could improve the safety and security of volunteers and NGO, VO staff that provide assistance in the frontline territories.

The resulting list can be divided into preventive and protective measures. They reflect two distinct approaches to managing risks and addressing potential threats or harmful situations.

Preventive measures are actions taken to reduce the likelihood or probability of an adverse event occurring in the first place. They aim to eliminate or minimise the root causes of potential problems by:

- implementing security protocols and practices to prevent accidents or injuries;
- using PPE to safeguard against hazards;
- conducting regular maintenance and inspections (PPE, IFAKs, cars) to identify and address issues before they escalate;
- providing education and training to help people recognize and avoid risky behaviours (security training, mine safety courses, first aid training, defensive driving, PFA);
- implementing cybersecurity measures to deter criminal activity or unauthorised access to information.

Protective measures, on the other hand, are actions taken to shield against or mitigate the impact of an adverse event if it does occur. They focus on minimising the consequences or harm when a risk materialises. This can include:

- deploying emergency response systems and procedures to manage crises;
- implementing insurance policies (personal, vehicles);
- implementing PSS (individual/group sessions).

5.2 Duty of Care minimum package

Following a review of small grants programmes to CSO and VO, the Ukraine Humanitarian Fund (UHF) has defined and adopted several recommendations in order to support effective humanitarian response through local organisations.

Among the recommendations on capacity development and support, the UHF has developed a "mandatory package" of Duty of Care support to local NGO/CSO/VO personnel operating near the front lines and other high-risk environments, including the provision of:

1) insurance for CSO/VO staff;
2) PSS/stress management guidance;
3) first aid trainings;
4) PPE when working in frontline locations.

Additionally, the UHF has recommended developing "a list of mandatory trainings or other forms of capacity support for granting partners to provide to CSOs and VOs, …prior to and during implementation of UHF-funded grants: …"Do No Harm", PSEA, narrative and financial reporting, financial procedures (including procurement) and monitoring and evaluation".

While these recommendations are consistent with our research findings and the needs expressed by INGOs and NNGOs, we believe that the DoC minimum package for those working in frontline areas should be slightly revised as follows:

1) health and life insurance for NGOs/CSOs staff and volunteers;
2) PSS measures;
3) IFAKs;
4) PPE;

5) training on the usage and application of DoC minimum package items, coupled to an introductory training on safety and security management.

The rationale of the proposed minimum package is that no equipment should be distributed without first building the capacity of the people who will use it, which some KIs say has not always happened before. (KII 6, KII 24)

Minimal mandatory PSS for DoC package should be as follows:

- to provide volunteers and staff with information on the support services available, including mental health and psychosocial support (MHPSS) services (e.g. peer-to-peer, self-care resources) and how to access support;
- to provide vouchers for individual psychological consultations.

Additionally, in order to overcome stigma and resistance to psychological practices, especially among men, training in mental health and support practices could be combined with safety and security management and first aid training.

Donors and large NGOs providing sub-grants to local organisations should raise awareness of the possibility of including DoC packages in project proposals and how to access them.

Minimum reporting standards on the use of DoC packages should be established, while providing clear, simplified procedures for local organisations to use.

5.3 Additional optional measures to be considered in the DoC packages

Equipment

In this section, we are reporting all items that have been mentioned by our KIs. Some of the items described can be of dual use: civilian and military. The decision on which optional equipment could be included in project proposal depends on the specific situation where they should be employed and donors' specific policies. The pros and cons for each item should be thoroughly assessed. Also, we underline that organisations intervening in frontline areas should focus on preventive measures rather than heavily rely on equipment.

Ceramic ballistic protective vests, though more expensive, should be preferred, at least for women, due to their lightweight compared to those with armoured metal plates.

Starlink connections are already adopted by some humanitarian actors in order to have access to Internet services in areas not covered by the mobile network or where it is not advised to use normal cell phones. These can be bulky and attract attention. Smaller alternative solutions exist, such as devices for sending an SOS signal.

Power banks are certainly useful considering that field missions occur in areas where there might be no electricity or no time to recharge devices.

Vehicle repair and fuel for volunteers' private vehicles could be part of operational costs against minimal reporting protocols on how they are used. Local volunteers conducting civilian evacuations or aid delivery need to be supported in their movements to ensure the necessary security backstops are put in place. Well-maintained and fuelled vehicles are a prerequisite.

Armoured vehicles are seen by some informants as important to protect against shrapnel or bullets. However, other actors believe that they can be easily detected and targeted by Russian Forces, as they could be seen as part of a military operation. In addition, they cannot protect against improvised combat unmanned aerial vehicles (UAVs), which can even damage or destroy a tank. Also, drivers need special training to operate this type of vehicle. Finally, they are much more expensive than normal cars. Based on these considerations, it may be useful to have a pooling system whereby a reduced number of armoured vehicles are made available for some activities by a group of organisations in a specific region.

Drone scanning and drone jamming devices have been requested by some organisations due to the increased risk of weaponised UAV in the 10-15 km range from the front line. However, the technology

is evolving rapidly hence, the equipment might be rapidly becoming outdated[15]. Given that jamming technology is in high demand for military forces, the risk of the opposition from government forces towards NGOs use might significantly outmatch the benefits.

Gas masks have not been mentioned by our KIs however they could be relevant considering that there are proofs of the use of chemical warfare agents, although in a limited and targeted manner so far. Some NGOs are having masks for fire safety reason in their offices. They can be effective also in case of the presence of asbestos dust in damaged houses.

Soft measures

Capacity building activities in some areas would help to reinforce the internal organisation regarding safety and security and raise awareness about certain risks and how to mitigate them. Apart from the basic training associated with the DoC minimum package, tailor-made trainings (adapted to the context) are requested with priority of 'in-person' trainings and mentorship on:

- advanced courses on safety and security management for a specific target audience (protocols, tools, internal systems and mechanisms);
- knowledge of Ukrainian legislation and international humanitarian law, which regulates response to humanitarian crises;
- awareness of mines and ammunitions risks;
- cybersecurity.

Other training topics are[16]:

- protection mainstreaming;
- humanitarian principles, incl. Do Not Harm;
- PSEA;
- humanitarian negotiations and communication skills;
- narrative and financial reporting, financial procedures;
- accountability to affected population;
- fair partnership principles.

Extreme or defensive driving practical training could be an additional asset, given that many humanitarian workers were not necessarily used to driving on unpaved or damaged roads before the full-scale invasion.

In order to enhance MHPSS the following practices could be considered:

- PFA training;
- training for non-psychologists to detect signs of distress to provide assistance;
- sensitization about the importance of mental health and how to cope with stress, anxiety and burnout;
- encouraging peer-to-peer support among humanitarian practitioners;
- staff retreat, eventually combined with capacity building moments;
- well-being and relaxation practices.

Staff and office relocation

It is worth considering emergency relocation measures in areas of shifting front lines. Staff who become displaced need housing and financial support until they are settled. NGOs that have to relocate offices and storage facilities require costs to be covered.

6 Ukraine Duty of Care model and its potential replication in other humanitarian contexts

Various key informants with extensive work experience in different countries, (KII 8, KII 23, KII 24, KII 36, KII 39, KII 40, KII 41, KII 47, KII 50, KII 51, KII 55) mentioned that the humanitarian context of the Russian-Ukrainian war is very specific. Ukraine receives a level of aid and support that is

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[15] Ref.: Ukraine short-range improvised combat UAVs implications and recommendations for NGOs. INSO.
[16] Some of them are already mentioned in UHF recommendations.

unmatched elsewhere. On the other hand, Ukraine has a strong civil society and a level of digitalisation that cannot be found in other contexts where humanitarian aid is needed. The absence of deconfliction measures between the parties able to guarantee the safety and protection of humanitarian personnel is not unique but nevertheless an additional characteristic of the ongoing situation.

Despite these specificities, the experiences that are under implementation in Ukraine on DoC policies and practices could be helpful also in other contexts.

Improving Duty of Care standards is a moral imperative for the protection and assistance to NGOs personnel that provide humanitarian aid near the front line. The Ukrainian experience in defining a minimum and optimal DoC packages could be adapted and adopted in other humanitarian contexts. It will be interesting as well to document how and to which extent DoC packages will be translated into concrete measures by donors and implementing partners.

A lesson learnt from the present review is that DoC for humanitarian responders is a moral and not only a legal obligation toward staff and volunteers risking their lives to help the communities affected by the war, and it should be applied beyond an organisation "own" staff and downstream to implementing partners. Also, DoC is not limited to providing the right equipment or to improving safety and security management including mental health; it embraces several aspects such as aid delivery mechanisms, coordination and fair partnership principles.

This review pointed out that improving safety and security conditions for staff working at the front line contributes to aid effectiveness and localisation by building the capacities at local level, transferring resources and responsibilities.

Best practices such as equipment lending mechanism, or health and life insurance schemes for humanitarian workers and volunteers could be replicated since they allow small organisations to benefit from services through the intermediation of a larger organisation thereby ensuring accountability toward donor agencies according to their procedures and reporting standards.

Finally, innovations in funding mechanisms such as the UHF small grants programme and its characteristics are certainly not limited to DoC practices but can certainly contribute to enhancing working conditions in frontline areas.

7   Recommendations

Direct and indirect factors that are affecting the safety and security of humanitarian personnel have been identified.

The direct factors include the availability of minimum DoC package: PPE, IFAKs, insurance and training.

Indirect factors include a wide list of organisational measures that reduce the risk for humanitarian workers such as coordination between actors, information sharing, operational cost for fuel and car repair, programmes to encourage on-time evacuation from frontline areas, to support internally displaced persons (IDPs) in order to avoid that they return to dangerous zones, and data protection.

The implementation of an acceptable DoC package should take into account both direct and indirect factors. This approach is reflected in the following recommendations.

Minimum Duty of Care package

- The definition of a minimum and optimum DoC packages should be widely discussed and finally adopted by all actors within the humanitarian community. A non-binding common framework agreement signed by donor agencies, UN agencies and NGO/CSO umbrella organisations could be a valuable tool for harmonising safety and security practices and procedures.
- Humanitarian country team (HCT) to commit to the principle of DoC and endorse the minimum DoC package.

Recommendations to donors

Funding and financial management

- In order to promote localisation, Ukrainian NGOs/CSOs are calling for more flexible funding, lean procedures and medium to long-term funding. Projects should include overheads costs for covering structural and administrative costs that are not directly linked to the project activities, supporting the organisations in its core functions. It is recommended that donors make this mandatory for their partners (i.e. include in contracts) or, at a minimum, use it as a non-mandatory criterion when evaluating proposals and budgets.

Adaptive support packages

Taking into account the diversity of humanitarian actors operating close to the front line and their different levels of compliance following due diligence assessments, it is recommended to offer them support packages adapted to their internal organisation:

- For local actors who do not meet the requirements for receiving large or long-term grants, the minimum DoC package should include: access to the rental of PPE, access to IFAKs, insurance schemes for staff and volunteers, PSS measures and introductory training in safety and security.
- For larger NNGOs, it is important to build their capacity to act as intermediaries between donors and small organisations, to receive DoC equipment in bulk for distribution to smaller organisations, and additional optional DoC measures including extensive safety and security management trainings.

Recommendations for humanitarian aid implementation

Coordination

- Foster humanitarian coordination between actors at oblast and, in some cases, at hromada level, increasing the level of synergy, especially in evacuation operations and assistance in hard-to-reach areas, through co-working spaces, coordination centres, information-sharing events between large INGO, NNGO and smaller organisations.

Capacity building

- Local organisations prefer capacity-building support and organisational development in the form of mentoring that is tailored to their needs and requests, rather than short "conducted and forgotten" trainings. It is recommended that this approach is adopted by the "funding organisation".
- A coordination mechanism for existing capacity building initiatives is highly needed in order to avoid duplication of efforts and to standardize the contents. NGOs/CSOs umbrella organisation should play a role in coordination of these initiatives.

Data protection

- Coordination centres and other organisations that accumulate data on beneficiaries, local actors, volunteers, have proven their effectiveness. In this regard, it is recommended to allocate resources in project budgets for the development of data protection measures, given the sensitivity of these data.

IDP support and evacuation issues

- Increase understanding of why and to which extent people are returning to insecure areas through an evidence gathering research to inform the response and reduce the risk of causing harm.
- There should be a lobbying and advocacy action of humanitarian actors toward the government in order to clarify the legal framework on evacuations.

Recommendations to NGOs/CSOs

Local organisations' responsibilities

- Local organisations must ensure compliance by their employees and volunteers with safety and security standards such as reporting about cases, adoption of mandatory training on humanitarian principles and appropriate use of equipment.
- In a medium-/long-term perspective, local organisations should consider specialising and professionalising. The organisational strengths, the knowledge and experience acquired in this emergency phase – including in compliance to procedures and reporting standards – will be useful in the recovery and reconstruction phase in which the civil society will have an important role to play.

Information sharing

- Promote bilingual information sharing among UN, large INGO, NNGO and smaller organisations. The circulation of information regarding risks and incidents can help ensure the safety and increase awareness of those who provide assistance to the frontline areas should be a matter of concern for every humanitarian organisation.

Partnership agreements

- Promote the establishment of consortia, based on fair partnership principles, between more structured organisations with smaller and young organisations in order to build organisational capacities at local level.

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Annex 1 – Timeline

Date	Day	Place	Activity
25.07.2024	THU	Kyiv	Briefing with Liù Fornara and Oleg Masyk, *Swiss Cooperation Office*
29.07.2024	MON	Kyiv	Meeting with Mila Leonova, *Alliance UA CSO*
		Kyiv	Meeting with Sasha Buglak, *Humanitarian NGO Platform in Ukraine*
30.07.2024	TUE	Kyiv	Work with documents, questionnaire preparation, trips organisation
31.07.2024	WED	Kyiv	Meeting with Ermina Strutinischi, *INSO*
		Kyiv	Meeting with George Ingles, *ACAPS*
		Kyiv to Kharkiv	By train
01.08.2024	THU	Arrival in Kharkiv	Arrival in Kharkiv, 06:45; to Kulikovskiy Hotel
		Kharkiv	Meeting Father Andriy Nasinnyk (head of Caritas Kharkiv), Ludmila Borovyk (deputy director), Oleg (security manager), *CARITAS UA*
		Kharkiv	Meeting at RCC, Yevhen Koliada, Danil Korchma
			Group meeting with a local organisations *Mission Kharkiv*, *Action*, *A common cause for people* (*RCC* office, until 16:30)
02.08.2024	FRI	Kharkiv	Meeting at *Proliska*
		Kharkiv	Meeting with *OCHA*
		Kharkiv to Kyiv	Arrival in Kyiv at 19:23
03.08.2024	SAT		-
04.08.2024	SUN	Kyiv	-
05.08.2024	MON	Kyiv	Analysis, reporting and meetings
06.08.2024	TUE	Kyiv	Intermediate meeting with Oleg Masyk and Mario Trutmann
06.08.2024		Kyiv to Mykolaiv	By train
		Mykolaiv	Arrival in Mykolaiv; to Green City Hotel
07.08.2024	WED	Mykolaiv	Meeting with Serhiy, Elena, *Regional association of territorial communities*, *4UA International volunteering centre*
			Meeting with Sarah Hamdy, Yumy, *Nonviolent Peaceforce*
			Meeting with Tatiana, Volodymyr, *Vidnovlennya*
08.08.2024	THU	Mykolaiv to Dnipro	By bus, arrival at 13:30; to Art Hotel Academy
		Dnipro	Meeting with Mykyta Prodanets, *Save Peace in Ukraine*, *Consortium NGO Space*
		Dnipro	Meeting with Katerina Chizik, the psychological space *ПРОжити* (*PROlive*) based at *Consortium NGO Space*
09.08.2024	FRI	Dnipro	Meeting with Marina Perederii, Anna Zavhorodnya, Halyna Lyashko, Charitable Fund *ПОМАГАЄМ* (*Ротодаеm*)
		Dnipro	Meeting with Eduardo Burmeister, *UNHCR*
		Dnipro to Kyiv	Train 21:48 > 05:50
10.08.2024	SAT	Kyiv	-
11.08.2024	SUN	Kyiv	Analysis and preparation of presentations
12.08.2024	MON	Kyiv	Pre donor discussion, meeting with Mario and Oleg, *Swiss Cooperation Office*

		Kyiv	FGD with humanitarian donor core group on Duty of Care minimum standards
13.08.2024	TUE	Kyiv	Meeting with David White, *UHF*
		Kyiv	Online meeting with Diya Alshboul, civil-military coordination officer, *OCHA*, Dnipro
		Kyiv	Kasia Kot-Majewska, senior protection cluster coordinator, *UNHCR*
14.08.2024	WED	Kyiv	Anna Medviedieva, *People in Need*
		Kyiv	Stakeholders feedback meeting, debriefing with Mario and Oleg, Mila, Sasha
20.08.2024	TUE	online	Vladyslava, *Proliska*
20.08.2024	TUE	online	Andrea Trevisan, *ECHO*, Dnipro
21.08.2024	WED	online	Thomas Mauget, Petr Base, *Helvetas*
21.08.2024	WED	online	Andrea Barboza, *Mercy Corps*
21.08.2024	WED	online	George Ingles, *ACAPS*
22.08.2024	THU		Oleksandra, *CEDEM* office
23.08.2024	FRI	online	Ekaterina, *Pluriton*, Sumy
26.08.2024	MON	online	Oleksandr Kulyk, volunteer from Novhorod-Sivers'kyi (50 km from Russian border)
26.08.2024	MON	online	Ruslan Isaev, *AVSI*
27.08.2024	TUE	online	Fred Larsson, *NGORC*
09.09.2024	MON	online	*CARE* team
10.09.2024	TUE	online	Andrea Barboza, *Mercy Corps*

Annex 2 – List of key informants

Name	Surname	Function	Organisation
Mykhailo			A common cause for people, Kharkiv
George	Ingles	Senior analyst	ACAPS
Oleksandr			Action, Kharkiv
Mila	Leonova	Director	Alliance UA CSO
Ruslan	Isaiev	Country representative	AVSI
Olena	Prokopchuk	Field manager Kharkiv	CARE Ukraine
Yuhana	Yudith	Human resources	CARE Ukraine
Yuliia	Serha	Area manager	CARE Ukraine
Father Andriy	Nasinnyk	Director of Caritas Kharkiv	CARITAS Ukraine
Ludmila	Borovyk	Deputy Director Caritas Kharkiv	CARITAS Ukraine
Oleg		Security manager Caritas Kharkiv	CARITAS Ukraine
Anna	Isichko	Deputy director, coordinator of the project "Initiative of sectoral support of civil society of Ukraine"	Centre of Democracy and Rule of Law
Oleksandra	Melnyk	Project manager, project "Initiative of sectoral support of civil society of Ukraine", security specialist	Centre of Democracy and Rule of Law
Anna	Zavhorodnya	Head of the development department	Charitable Foundation ПОМАГАЄМ (Pomogaem), Dnipro
Halyna	Lyashko	Security specialist, project manager	Charitable Foundation ПОМАГАЄМ (Pomogaem), Dnipro
Marina	Perederii	Director	Charitable Foundation ПОМАГАЄМ (Pomogaem), Dnipro
Andrea	Trevisan	Technical assistant	ECHO, Dnipro
Eric	Peterson	First secretary	Embassy of Sweden
Alice	Hooper	Humanitarian advisor	FCDO Ukraine
Jeremy	Loveless	Humanitarian advisor	FCDO Ukraine
Petr	Base	Country director	Helvetas
Thomas	Mauget	Humanitarian response coordinator	Helvetas
Oleksandra	Buglak	Deputy director	Humanitarian NGO Platform in Ukraine
Ermina	Strutinischi	Country director	INSO Ukraine
Vasyl	Piskunov	Safety advisor	INSO Ukraine, Dnipro
Elena	Vlasenko	Volunteer	International volunteering centre 4UA, Mykolaiv
Andrea	Barboza	Team lead, Ukraine Crisis Analysis Team	Mercy Corps
Maria			Mission Kharkiv
Fred	Larsson	Director	NGORC
Sarah	Hamdy	NP Mykolaiv Team	Nonviolent Peaceforce, Mykolaiv
Joachim	Kleinmann	Senior programme manager	Nonviolent Peaceforce, Odesa
Dmytro	Filipskyi	Associate humanitarian affairs officer	OCHA, Kharkiv
Iryna	Chernysh	Assistant humanitarian affairs officer	OCHA, Kharkiv
Diya	Alshboul	Civil-military coordination officer	OCHA, Dnipro

Anna	Medviedieva	Civil society engagement technical lead	People In Need, Ukraine
Kateryna	Arisoy	Head	Pluriton, Sumy
Hanna	Zavoloka	Consultants for monitoring the humanitarian situation and consulting on social issues	Proliska, Kharkiv
Olena	Pavlovska	Consultants for monitoring the humanitarian situation and consulting on social issues	Proliska, Kharkiv
Vladislava	Zomareva	Deputy head	Proliska, Uzhhorod
Katerina	Chizik	Head	Psychological space ПРОжити (PROlive), Dnipro
Danil	Korchma	Senior project specialist	RCC
Yevhen	Koliada	Director	RCC
Serhiy	Vlasenko	Chairman of the board	Regional association of territorial communities, 4UA International volunteering centre, Mykolaiv
Mykyta	Prodanets	Director	Save Peace in Ukraine, Consortium NGO Space, Dnipro
Olle	Castell	Ukraine response coordinator	SIDA
Liù	Fornara	Head of the humanitarian programme	Swiss Cooperation Office, Kyiv
Mario	Trutmann	Deputy humanitarian coordinator	Swiss Cooperation Office, Kyiv
Oleg	Masyk	National programme officer	Swiss Cooperation Office, Kyiv
David	White	Head of humanitarian financing/Funds manager	UHF-OCHA
Eduardo	Burmeister	Protection cluster coordinator	UNHCR, Dnipro
Kasia	Kot-Majewska	Senior protection cluster coordinator	UNHCR, Kyiv
Vika	Planson	Deputy leader for coordination	USAID/BHA DART, Ukraine
Xerses	Sidhwa	Team leader	USAID/BHA DART, Ukraine
Tatiana	Tymoshenko	Head of the department of the day care centre for children and their families	Vidnovlennya, Mykolaiv
Volodymyr	Tymoshenko	Chairman of the board	Vidnovlennya, Mykolaiv

Annex 3 – Interview guide

NGO/CSO Interview guide

Introduction to the interview, personal introduction

- Explain the purpose of the interview. Confidentiality. Duration approximately 60 min.
- Emphasise the importance of obtaining information in order to reduce risks and increase safety, security and mental well-being of volunteers and staff of NGOs through fair partnership and joint risk sharing approaches – to set a response-wide acceptable Duty of Care minimal standard.
- Request for a brief introduction of yourself and your organisation.
- Can you briefly introduce yourself and your organisation? When it was established, main activities?
- Staff and volunteers: how many, how are they organised?
- Do you have formal agreements with volunteers?

Section 1   Discovering the peculiarities of the organisation's activities near the front line

- How close to the front line are you working?
- What type of activities are you performing?
- Needs assessment and coordination with other organisations?
- What difficulties did you face when organising missions near the front line?
- What are the ways to overcome these difficulties?

Section 2   Discovering the security procedures/instructions/protocols for employees and volunteers within organisation

- Security systems and procedures; risk assessment mechanisms.
- Security manager. Person/persons who shared these responsibilities.
- Types of incidents experienced. Report registration procedure. What is the organisation's role in helping victims?
- Equipment for frontline missions.
- Are you aware of a PPE lending facility?
- Insurance scheme for staff and volunteers and procedures to get paid.
- What do you provide to partner's organisations?
- What do you provide to volunteers?
- What kind of training does your organisation provide for staff and volunteers? How helpful are they? What kind of training and how often do you need?
- What could help to improve the safety and security of staff and volunteers?
- PSS. How much it is in demand in your organisation. Successful and unsuccessful practices.
- Behavioural mitigation of some risks.
- How do you cooperate with local authorities at hromada level in order to organise activities at the front line?
- How do you get information or share information about the risks?
- Risk sharing aspects.
- Terminology/definitions on safety and security. Translation of Duty of Care into Ukrainian language
- Possible, preferable ways to mainstream the information about security, Duty of Care.

Section 3   Recommendations

- Do you have any recommendations for how the security/Duty of Care practices should be improved?
- According to your experience, what donors are willing to accept as DoC package and what not?
- According to your previous experience, what Duty of Care practices could be replicated in other countries and context?

Closing

- Do you have any other comments or suggestions regarding the security/Duty of Care initiatives?
- Is there any document that you might be able to share with us?
- Explain how the insights from this interview be used to improve Duty of Care initiatives?
- Thank the participation for their time and valuable input.

Interview guide to UN personnel

Introduction to the interview, personal introduction

- Explain the purpose of the interview. Duration approximately 60 min.
- Emphasise the importance of obtaining information in order to reduce risks and increase safety, security and mental well-being of local partners through fair partnership and joint risk sharing approaches – to set a response-wide acceptable Duty of Care minimal standard.
- Request for a brief introduction of yourself and your organisation.

Main part. General information

- Introduction about the operations.
- What duties among UN agencies in a region?
- Protocols, procedures, how are you internally organised: what your staff can do and cannot do?
- How close to the front line are you allowed to provide your activity?
- How is the needs assessment carried out? Are there some opportunities to improve it?
- Aid coordination mechanisms?
- How they work with local organisations and volunteers? How many, how are they registered with them? How are they selected and contacted? Partner assessment or due diligence.
- Types of incidents.
- How to mitigate the risks?
- What could be done to improve the safety and security of staff and volunteers (PPE, PSS, insurance, behavioural mitigation of some risks)?
- How do you cooperate with local authorities at hromada level in order to organise activities at the front line?
- What safety equipment do you use when operating close to the front line (PPE, digital radios for communication, armoured vehicles)?
- Do you provide fuel and car repair services to volunteer or local partner organisations?
- Psychological support to staff and volunteers.
- Is data security an issue?
- Did you experience incidents working toward the front line? If YES, what mitigation measure did you take?
- What kinds of training are required?
- How do you understand risk sharing practices? What is actually in place?
- According to your experience, what donors are willing to accept as DoC package and what not?
- Possible, preferable ways to mainstream the information about security and minimum Duty of Care package.
- What problems did you face in Ukraine? How do you think they can be resolved?

Section 3   Recommendations

- Do you have any recommendations for how the safety, security/Duty of Care practices should be improved?
- Potential replication of the Ukraine Duty of Care practices in other countries and humanitarian contexts.

Closing

- Do you have any other comments or suggestions regarding the security/Duty of Care initiatives?

- Explain how the insights from this interview be used to improve Duty of Care initiatives?
- Thank the participation for their time and valuable input.

Guide for donors' group discussion

Introduction

- Explain the purpose of the meeting and group discussion.
- Emphasise the importance of obtaining information in order to reduce risks and increase safety, security and mental well-being of local partners through fair partnership and joint risk sharing approaches – to set a response-wide acceptable Duty of Care minimal standard.
- Request for a brief introduction of yourself and your organisation.

Main part

- What are roles and responsibilities regarding Duty of Care practises that donor agencies should take into account regarding humanitarian respondents?
- What could be improved in the way it is delivered in order to minimise or mitigate the risks?
- Are current delivery mechanisms the most appropriate way of supporting population in frontline areas?
- How to improve needs assessments in order to have more precise delivery, therefore minimising movements of people and goods in dangerous zones?
- Which procedures are mandatory and which ones could be smoothened in order to simplify the tasks of aid delivery in the field?
- What your agency will be willing to accept in project proposals and under which conditions?

Recommendations

- Do you have any recommendations for how the minimum Duty of Care package should be improved?

Closing

- Do you have any other comments or suggestions regarding the minimum Duty of Care package?
- Thank the participation for their time and valuable input.

Annex 4 – Detailed regulatory framework description on civil society and volunteering in Ukraine

In Ukraine, there isn't a specific legislation on "Duty of Care", instead the terms "labour protection", "labour safety", "labour guarantees" and "compensation" are used. The relevant provisions are contained in the Labour Code of Ukraine and the Laws of Ukraine "On labour protection" and "On mandatory state social insurance". The employer and the state are responsible for the implementation of such guarantees for employees.

In some documents of NGOs working in Ukraine (KII 42) we have found a literal translation of the expression "Duty of Care" such as "обов'язок належної турботи" ("duty of due care"), "політика піклування" (literally "policy of care") or "політика першої турботи" ("policy of first care"). (KII 43, KII 44)

However, when talking about Duty of Care issues, many informants refer generically to "security" ("безпека"), taking in account that Ukrainian – as in Latin languages – safety and security are merged into one term.

Following our research and consultations, we suggest adopting the following term: "обов'язок турботи" [oboviazok turboty]. According to the law, all employees are subject to mandatory state social insurance against accidents at work and occupational diseases that have caused the loss of working capacity (the Law of Ukraine "On labour protection", Art. 5 (4)). The legislation allows establishing additional guarantees for employees and, for example, to pay them (and sometimes even family members of the employee) a private health insurance. All this is the subject of agreements under the employment contract.

Employees of charitable organisations and public associations are subject to labour legislation, mandatory state social insurance and social security in contrast with the relationship between volunteers and an organisation, where there are no such obligations. Similarly, staff employed as "service providers" (sometimes qualified as "individual entrepreneurs") are not subject to the provisions of the labour law[17].

The activities of volunteers are regulated by the Laws of Ukraine "On volunteering", "On charitable activities and charitable organisations" and "On public associations".

Ukrainian laws do not have a definition of "civil society organisation". CSO it is used as a general concept, but for the purpose of the legal entity's registration, there are such options:

    a) Public association that can operate in the form of:
        i)   a public organisation (the founders are natural persons); or
        ii) a public union (the founders are legal entities).

They are regulated by the Law "On public associations". The purpose of these organisations is to exercise and protect rights and freedoms, to satisfy the public, in particular economic, social, cultural, environmental and other interests.

    b) Charitable organisations, regulated by the Law "on charitable activities and charitable organisations". Their purpose is the organisation of charitable activities.

According to the Law "On state registration of legal entities", individual entrepreneurs and public organisations, the state registration of the above-mentioned legal entities takes three working days, as well as the assignment of the status of a non-profit organisation. Registration is free of charge.

NGOs and CSOs in Ukraine are registered under both types of legal status: public association or charitable organisation. The legal status does not affect the obligations of the organisations to their staff or volunteers. Both are non-profit legal entities and can involve volunteers. However, there is no such thing as a 'volunteer organisation' as a legal entity. It is the type of membership or the modalities of operation that define this type of organisation. In this document, we refer to volunteer

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[17] In this document, we use the term "staff" to refer to people who work with an organisation on a regular basis and receive payment for their work, as opposed to volunteers who may receive reimbursement or a stipend to cover their expenses.

organisations when a registered organisation is made up entirely of volunteers or is mainly run by volunteers with limited staff (less than 5 people).

Volunteering, as defined by the specific law, is a type of charity, considered a voluntary, socially oriented, non-profit activity carried out by volunteers (Art. 1). Free performance of work or provision of services by persons based on family, friendship or neighbourhood relations is not considered as volunteering activity.

According to the law, the organisation's statutory documents are not required to contain requirements for the safety of volunteers or certain guarantees for them.

However, organisations that engage volunteers are obliged to (Art. 5 (3)):

- provide volunteers with safe and suitable life and health conditions for performing volunteer activities;
- train volunteers;
- provide volunteers with reliable, accurate and complete information about the content and specifics of volunteer activities;
- provide free access to information related to the implementation of volunteer activities by the organisation that involves volunteers in their activities.

Organisations may issue certificates (IDs) to volunteers and eventually insure their life and health while performing volunteer tasks. Provisions regarding insurance may be included in the volunteering agreement between the organisation and the volunteer (Art. 5 (2)) but it is not mandatory.

Volunteers may be reimbursed for expenses (for example, for business trips, food, obtaining visas, telephone services or mail, vaccinations, etc.) (Art. 11).

The law (Art. 6) stipulates that in the event of the death of a volunteer or his mutilation (contusion, injury), which occurred in connection with the events of the armed aggression of the Russian Federation against Ukraine, she/he (or a family member – in case of death) is entitled to payment from the state budget. The payment procedure in case of a volunteer's death or injury was established by the Decree of the Cabinet of Ministers of Ukraine No. 604, on August 19, 2015. Applications for the payment are considered by the Interdepartmental commission, which operates under the Ministry of Veterans Affairs.

To confirm that injury or death is due to volunteering activities which occurred in connection with the events of the armed aggression of the Russian Federation against Ukraine, a person or his/her representative should provide the statement (testimony) to the head of one of the units of the Armed Forces (or other units of the Defence Forces). Additionally, other documents can be required to confirm this fact.

We sent a request to the Ministry of Veterans Affairs in order to clarify the number of cases of such payments (compensations) to volunteers since the beginning of the full-scale invasion of the Russian Federation into Ukraine. According to the information provided by the Ministry of Veterans Affairs, for the period from 24.02.2022 to August 2024, the Interdepartmental commission decided to award one payment in the case of volunteer's disability and six decisions were made on the award of one-time payment in case of death of the volunteers.

Annex 5 – Reference list

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«Безпекові потреби ОГС, активістів, волонтерів, правозахисників». Аналітичний звіт ЦЕДЕМ, підготований Олександрою Мельник, Аріною Євгієнко, 2024.
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Security needs of CSOs, activists, volunteers and human rights defenders. Analytical report of CEDEM. Kyiv, 2024.
https://cedem.org.ua/library/bezpekovi-potreby-zvit/
Що потрібно знати громадським та благодійним організаціям про безпеку команди. Доступ до переліку методичних рекомендацій та інфографіки щодо питань фізичної, ментальної, цифрової та правової безпеки для волонтерів та ГО, підготовлені ЦЕДЕМ:
https://cedem.org.ua/bezpeka-ogs/
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Localisation

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[18] INSO information is intended for humanitarian use only. In the event of any questions, please contact the INSO Ukraine CD at: director@ukr.ngosafety.org

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