

## Procedure

### for the report and investigation of ethics cases, allegations of harassment and sexual exploitation and abuse, exploitation, fraud and bribery

#### Preamble

The purpose of this Code is to increase the confidence of employees and persons involved in its activities to report suspected or actual fraud, bribery or other forms of misconduct.

Everyone has the right to report misconduct, or suspicions of misconduct, without risk of exposure or retaliation and to have their complaint addressed by the organization.

The Congregation will have zero tolerance for anyone who is found to have knowingly made a false report against another person and will take appropriate employment or, where appropriate, criminal action against them.

Key concepts:

- a) A reasonable suspicion is based on information that the whistleblower believes to be true or reliable. The motive of the whistleblower is not relevant to the substantiality of the suspicion.
- b) A false accusation is when the whistleblower knowingly makes false statements or reports information that he or she knows to be false.
- c) Everyone is presumed innocent until proven guilty.

#### I. Reporting a complaint or suspicion

##### 1. Reporting channels

A report of actual or suspected misconduct can be made through any of these confidential channels:

- a) in person to the internal focal point
- b) via email to the internal focal point, at: [panaszkezeles@devaifogado.hu](mailto:panaszkezeles@devaifogado.hu)

If any disclosure or sensitive complaint is received through the complaint box at the reception of the Dévai Inn, the internal focal point should be immediately notified. If the internal focal point is not available, the external focal point should be contacted directly.

If a member of the Church or a member of its staff learns of the complaint or suspicion directly from the person concerned, he or she is obliged to act in accordance with the provisions of this Code of Procedure, in particular:

- a) in the case of danger to life, physical or serious psychological trauma, to take immediate action to seek medical attention for the victim,
- b) immediately notify the internal focal point (or, if not available, the external focal point) who is responsible for receiving complaints under this procedure.

##### 2. Accessibility

Reports can be lodged in Hungarian, Ukrainian, Russian or English. If the complainant has the difficulty with writing or reading, he or she can complain verbally to the internal focal point. If necessary, the Church will provide the complainant with an interpreter.

### 3. Anonymous reports

In order to take the necessary action on the basis of the report, the whistleblower (who may be the victim) is encouraged to include detailed information about the reported act, to the extent possible, including the persons directly involved (who, what was done, with whom it happened), the place, time and any other relevant circumstances. The reporting forms set out in Annex 1 and 2 to these Procedures, which are available on the website and in hard copy at the Dévai Inn, may be used for this purpose.

A report may be made anonymously, but it will facilitate the investigation of cases if the name and contact details of the person making the report are communicated to the recipient of the report. Although anonymous complaints are accepted and all are investigated by the Congregation, if the complaint is anonymous, it is not always possible to carry out an investigation because it is unlikely that due process can be ensured. However, other safeguards can be put in place to reduce/eliminate risks (e.g. improved supervision of certain activities or programmes, mandatory training for all employees, etc.)

### 4. Obligation to report

All member of staff and volunteers have a duty to report actual or suspected misconduct in any of the following areas:

- a) Fraud or bribery
- b) Sexual misconduct, i.e. sexual exploitation and abuse

The victim of sexual exploitation, abuse or harassment is not required to report the complaint. The reporting party must act with the victim's best interests in making the report and may not share his/her personally identifiable information without informed consent.

If the whistleblower makes a report in person, the church leader who receives the report will complete a report form or, if this is not possible, record a report, including all relevant information about the subject of the report and, if the whistleblower does not wish to remain anonymous, the name and contact information of the whistleblower.

## **II. Protection of the whistleblower and victim-centred approach**

### 1. Whistleblower protection

The Congregation will exercise zero tolerance for retaliation against whistleblowers.

The Church will provide appropriate protection and support to anyone who reports a real suspicion. The Congregation undertakes to support whistleblowers by:

- Taking care not to underestimate or ignore the risk to which the whistleblower may be exposed or the level of fear or distress that they may be experiencing.
- Ensuring that the whistleblower's report is handled appropriately.
- Answering the whistleblower's questions to the best of his/her knowledge and provide emotional support, but not share confidential information with the whistleblower.
- Informing the whistleblower of the action taken in response to the report.

- If the whistleblower experiences or fears retaliation or harassment, taking the necessary measures to ensure the safety of the whistleblower, even if this involves costs.

## 2. Victim-centred approach

In the context of sexual misconduct, the victim-centred approach refers to the provision of services to individuals with needs directly arising from the misconduct perpetrated by staff and associated personnel of the organization. The victim's wishes, safety and well-being are a priority in all matters and procedures. A victim shall be provided assistance and support as soon as information about an allegation is received, by skilled and competent service providers. It is the responsibility of the organization to ensure the fulfillment of the principles of the victim-centred approach:

- a) Do no harm: well-being, protection and security first
- b) Assistance and protection
- c) Respect
- d) Non-discrimination
- e) Information
- f) Confidentiality
- g) Informed consent (and withdrawal of consent)

Assistance and referrals are provided based on the GBV referral pathways (see Annex 6 below).

## III. Liability

1. Church leaders have a responsibility to create an environment free from abuse of power, harassment and sexual harassment. All staff members have a role to play in ensuring that:

- a) Ensure that the church is an environment free from intimidation, hostility, abusive behavior, or other forms of harassment;
- b) Take action against any behaviour within the congregation that undermines the dignity or integrity of another person;
- c) Support the reporting and investigation of incidents of abuse of power, harassment and/or sexual harassment, while maintaining the confidentiality of the identity of the persons involved in such complaints;
- d) Cooperate when requested to provide information in the investigation of an incident of abuse of power, harassment or sexual harassment.

2. Duties and Responsibilities of the Pastor of the Congregation:

- a) Maintains a record of all incidents.
- b) Organizes and documents staff training and continuing education.
- c) Maintains and enforces confidentiality with staff.
- d) Ensures the protection and support of the victim.
- e) Takes routine action to protect the assets of the congregation as necessary
- f) Decides on the action to be taken in response to a report or complaint and ensures that an internal investigation is conducted in accordance with the principles of due process.
- g) On the basis of the complaint and depending on the outcome of the investigation, take the necessary measures concerning the employer or other employment contracts.

#### **IV. Confidentiality**

All persons involved in an investigation procedure (including the victim/complainant, the person who receives or records the report or complaint, the internal and the external focal points, the subject of the investigation, the witness(es), the expert, the members of the investigation committee, and also the interpreter) shall be bound by confidentiality during the proceedings and thereafter without any time limitation. The template for the confidentiality statement to be signed by the participants of a case is attached as **Annex 3** to these Rules of Procedures.

#### **V. Conflicts of interest**

1. The following shall not take part in the investigation of a notification or complaint:
  - a) the complainant or the person lodging the complaint,
  - b) the person complained against (accused),
  - c) a direct or indirect subordinate or any other subordinate in another professional hierarchy of the person complained against; and
  - d) a relative or former relative of the person complained against, as defined in Section 8:1 (1) 2. of the Civil Code (Act V of 2013 on the Civil Code);
  - e) a person who is known to be violent, aggressive, or violent-tempered towards others;
  - f) a person against whom the complainant has an explicit objection;
  - g) a person who cannot be expected to give an unbiased assessment of the matter because he or she is known to be, or has expressed views consistent with, rigid patriarchal social hierarchies, prejudicial stereotypes and/or rigid gender roles.
  
2. If the subject of investigation is the pastor of the Church, the pastor's rights and obligations under this Procedures shall be those of the Superintendent (Lay leader).

#### **VI. Action to be taken upon receipt of a complaint or allegation**

1. Upon receipt of a report, an electronic case file shall be opened by the internal focal point that contains all emails, minutes, reports and other information relevant to the case. The file shall be password protected and stored in a secure place. Only the internal focal point, the external focal point, the member of the Investigation Committee may have full access to the file or folder.
2. The internal focal point shall inform immediately the external focal point that the case file has been opened.
3. Each complaint should be acknowledged by the external focal point within 24 hours. The text of the acknowledgement e-mail to be sent to the complainant within 24 hours is attached in **Annex 4**.
4. Reports of possible misconduct are logged in a password-protected Excel sheet managed by the external focal point. Each report of misconduct should receive a case number: registration number/year (1/2023) The template of the Excel-sheet of the reports of possible misconduct is set out in **Annex 5**.
5. If misconduct is reported verbally, the acknowledgement will usually also happen verbally in the same moment. In this case, the recipient of the complaint will provide the complainant with verbal

information, record his or her contact details and send the case number and written information to the email address provided by the complainant.

6. If urgent measures to protect a victim seem necessary, the relevant colleagues in the organization (or other organizations that are able to provide such protection measures listed in Annex 6), should be informed in confidentiality and in line with the informed consent of the victim.
7. The Congregation shall retain the reports and actions taken as an electronic record in a separate, searchable, restricted-access folder until the end of the 5th year following the action taken on the report (internal procedure, denunciation).
8. If medical, psychological or mental health care or legal support is required to support the victim, the internal focal point shall arrange for the immediate provision of such care and, if necessary, the Congregation pays the costs of such care not covered by another authority or insurer.
9. The external focal point is responsible to inform the UN partner agency (or agencies) about every SEA allegation received, as soon as possible. During the investigation process, the UN partner(s) shall be kept updated.

#### **VII. Preliminary assessment of a complaint/report**

1. The external focal point is responsible for the conduct of an initial assessment to determine whether an investigation is warranted.
2. The objective of the preliminary assessment is to:
  - a) determine whether the alleged facts, if proven true, would amount to misconduct,
  - b) establish whether there is a reasonable likelihood that an investigation could reveal sufficient evidence to prove or refute the allegations.
3. SEA allegations, due to their seriousness and potential harm, would generally always be thoroughly investigated and only exceptionally it may not be possible to open an investigation. An investigation may not be pursued in these cases:
  - a) there is compelling objective evidence that the complaint is untruthful and no misconduct took place;
  - b) the length of time elapsed since the alleged wrongdoing renders it impossible to verify the incident;
  - c) the complaint is too vague to enable an investigation and there is no possibility to contact the complainant to clarify;
  - d) it seems impossible to find reliable information about the incident because there are no available witnesses and no other possible evidence;
  - e) the victim's safety is at serious risk and there is no possibility to protect them;
  - f) the victim denies consent for all possible investigative steps and wants no action taken).
4. The preliminary assessment has four possible outcomes:
  - a) An investigation is opened. The external focal point is responsible for informing the complainant and the source of the complaint who is not the victim. In sharing information

about the opening an investigation, the external focal point shall remind them to observe confidentiality: they must not inform anyone else about the investigation, otherwise it might put the investigation at risk.

- b) The case is referred to a different organization for their investigation: this happens when the initial assessment reveals that misconduct is possible, but an other organization is accountable for the alleged perpetrator's behavior and therefore they need to investigate.
  - c) The case is referred to a different team within your organization for follow-up. This can be a solution if the alleged behavior does not amount to misconduct, or if it is impossible to investigate without putting the victim at serious risk, but the victim may still need assistance from other relevant colleagues.
  - d) The case is closed and no investigation is opened. E.g. it seems impossible to find information about the alleged incident or when the victim denies consent for all possible investigative steps, with or without their participation.
5. The external focal point shall inform immediately the internal focal point, the pastor and the supervisor of the Congregation of the results of the preliminary assessment.
  6. The preliminary assessment should be completed within 10 days of the receipt of the complaint. If this is not possible, the external focal point may extend the duration of the procedure by 10 days and shall inform the complainant and the internal focal point accordingly.
  7. For allegations that do NOT pertain to sexual exploitation and abuse, an investigation shall not be conducted into an ethics matter if, on the basis of an interview with the complainant during the preparation of the investigation, the complaint can be effectively dealt with without an investigation and the complainant requests or expressly agrees to this. In this case, the complaint handler will proceed to address the complaint in a manner agreed with the complainant (in particular, mediation).

### **VIII. Process of an investigation**

1. The purpose of conducting an investigation is to gather evidence and facts to determine whether the suspicions or allegations are true and whether they are a one-off occurrence or a recurrent pattern of behaviour or activity.
2. The investigation must ensure impartiality, thoroughness and confidentiality. The investigation shall be completed within a reasonable time.
3. During the investigation, the victim and the subject of the investigation (and, on a case by case basis, other participants) shall be given the opportunity to seek the assistance of a person of trust (for moral support), or a legal representative or counsellor. The person of trust, the legal representative or counsellor can participate in the interviews and bound by confidentiality.
4. All participants in the investigation, including in particular the person complained against, shall be informed of the purpose, the course and the possible consequences of the investigation.
5. All persons concerned shall be presumed innocent until proven guilty.

6. Any notification or complaint lodged shall be investigated and, if it concerns a failure to comply with an internal rule, shall be investigated in accordance with the internal policies of the Congregation.
7. The investigation will be conducted by a **3-member Ethics Committee, whose members will be appointed by the Pastor of the Congregation.** The external focal point is an ex officio chairperson of the Committee. The pastor may invite a member of the presbytery and an outside expert (lawyer, psychologist, private investigator) to serve on the Ethics Committee.
8. Members are expected to be objective and impartial, thorough, and able to maintain confidentiality. Expert members are also expected to have professional competence and experience, and they adhere to the victim-centred approach. For SEA investigations specifically, due to the sensitivity of the topic, minimum requirement that the investigators complete the Investigating Allegations of Sexual Exploitation and Abuse E-learning.<sup>1</sup>
9. If the employer is the subject of the investigation, the Presbytery is entitled to invite the members of the Ethic Committee to conduct the investigation.
10. The order of the investigation interviews for cases of SEA is as follows:
  - a) The source of the complaint, if different from the victim
  - b) The victim
  - c) Relevant witnesses suggested by the victim
  - d) Other relevant witnesses
  - e) The subject of the investigation
  - f) Relevant witnesses suggested by the subject of the investigation.
11. If it is likely that the committee's investigation would impede or obstruct the effectiveness of the investigation of an infraction or criminal prosecution, the chairperson of the Committee may suspend the investigation. If only the victim or his or her legal representative is entitled to make a report at the police or the court, the pastor of the congregation shall ensure that the victim or his or her legal representative is provided with the information necessary to initiate the proceedings and the possible consequences of the proceedings.
12. The investigation shall be carried out with respect for the persons concerned, and the Ethics Committee shall conduct the investigation in accordance with the following principles:
  - a) The Committee shall endeavour to promote appropriate confidentiality, and the complainant shall not be placed in a worse position than before the complaint was made.
  - b) The parties concerned should be heard separately, up to and including the end of the procedure, as long as a joint hearing can be avoided. Joint hearings are always to be avoided in sexual exploitation and abuse investigations.
  - c) The complainant may not be compelled to attend a joint hearing, still less to submit to a confrontation - the refusal of the complainant to attend a joint hearing or to submit to a confrontation shall not constitute grounds for refusing to proceed or for terminating the proceedings.

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<sup>1</sup> Available at: <https://learning.unpartnerportal.org/course/view.php?id=4>; or on the UNHCR Learn and Connect platform at <https://unhcr.csod.com/client/unhcr/default.aspx>; or DisasterReady.org at <https://www.disasterready.org/courses> (search 'SEA investigations')

- d) If any person has knowledge of a conflict of interest in relation to a member of the Committee in general or in relation to a particular matter, he or she has the right to report it to the member or management of the Committee of his or her choice.
  - e) An institutional member of the Committee is expected to be familiar with the rules of conduct adopted by the Congregation and the provisions of this Code of Conduct and the professional criteria for membership of the Committee.
13. An external member of the committee is expected to have known expertise in critical perspectives on power relations, the literature, exploration and practice of addressing power abuse, harassment, sexual harassment, and abuse of authority, to be sufficiently sensitive, to not hold views that reinforce social and personal power hierarchies, and to be independent of the institution. For SEA investigations specifically, due to the sensitivity of the topic, minimum requirement that the investigators complete the Investigating Allegations of Sexual Exploitation and Abuse E-learning.
14. During the hearing of the persons concerned, it must be ensured that the following is available:
- a) documentation of the interview (date, place, persons present, questions and answers of the interviewee)
  - b) enforcement of the prohibition of coercion
  - c) the presence of a support person, legal representative or counsellor, if so requested and deemed appropriate.
15. All participants to an investigation process have **a duty to confidentiality and to provide information to the best of their knowledge**. Additionally, they have rights and duties as follows:

Rights of the victim, as well as the complainant and other witnesses:

- a) professional, impartial, thorough investigation without undue delay
- b) confidentiality in the conduct of the investigation
- c) explanation of the process
- d) protection from retaliation (whistleblower protection)
- e) non-disclosure of the identity of the source of a complaint
- f) measures to protect against safety risks
- g) to be accompanied at the interview by a person of trust, legal representative or counsellor
- h) assistance of an interpreter
- i) review their record of interview.

Rights of the subject of investigation:

- a) presumption of innocence throughout the investigation
- b) professional, impartial, thorough investigation without undue delay
- c) confidentiality in the conduct of the investigation
- d) explanation of the process
- e) opportunity to explain his/her conduct, suggest relevant witnesses, and present relevant information
- f) scheduling of interview at a reasonable place and time
- g) to be accompanied at the interview by a person of trust, legal representative or counsellor
- h) assistance of an interpreter
- i) review his/her record of interview



- j) opportunity to comment on the factual findings of the investigation and to provide additional evidence.

Obligations of the Ethics Committee conducting the investigation:

- a) conduct an objective, impartial and fair investigation
- b) maintain the integrity of the investigation
- c) disclose and manage any actual or perceived conflict of interest
- d) maintain confidentiality (“need-to-know” basis)
- e) collect both inculpatory and exculpatory evidence
- f) balance the rights of the subject and the protection of the victims (and take appropriate steps if serious risks are identified)
- g) draw only reasonable inferences
- h) support investigative conclusions with objective findings.

Obligations of the support person, legal representative or counsellor:

- a. may be present at the hearings, but may not intervene
- b. may not make a personal statement in place of the person being interviewed
- c. is bound by confidentiality.

**IX. Closure of the investigation, possible consequences**

1. The investigation should be completed within 30 days of its initiation. If this is not possible, the Ethics Committee may extend the duration of the procedure by 30 days and shall inform the parties concerned accordingly.
2. Following the closure of the investigation, the Committee may decide to:
  - a. The fact of abuse/harassment/sexual harassment has not been credibly proven and therefore no further action can be taken by the Congregation. The Committee assesses the evidence as a whole and decides on the balance of probabilities: it considers that the evidence indicates that the event more likely occurred, then it did not. The Committee shall also consider the aggravating and mitigating factors.
  - b. The sexual exploitation or abuse/harassment/sexual harassment has been credibly proven. The Committee will record this in a written decision and determine the further conduct or sanction expected of the complainant;
  - c. It is established that the report or complaint was wrongly made. The Committee shall record this in a written decision and close the procedure;
  - d. It is established that the notification or complaint was a deliberate false notification.
  - e. If it appears that the case may give rise to criminal proceedings, the Committee shall inform the parties concerned of this possibility. This information shall be recorded in the decision of the committee. If the complainant so requests, he or she shall be provided with all the documents relating to the case.
3. The result of the investigation shall be sent to the pastor and the supervisor, on the basis of which the pastor and supervisor decide on the applicable employer action. The result of the investigation also shall be sent to the complainant (if she/he is the victim or the person of concern) and the subject of investigation. The decision of the pastor and the supervisor shall include the employer's action, indicate the possibility and the means of appeal and shall inform the persons concerned that the present procedure is not an obstacle to, nor a substitute for, any other administrative or

judicial appeal procedure. The case file shall be made available to either party upon request, while ensuring the protection of personal data.

4. If the subject of the investigation is one of employers, the Presbytery is entitled to make the decision.

## **X. Appeals**

1. Both parties shall have the right to appeal the decision of the employer within **thirty** days of notification; the appeal shall be sent to the Presbytery of the Congregation. The Presbytery shall establish a two-members ad hoc committee to consider the appeal within 8 days and the committee shall review the investigation documentation within 30 days of the request.
2. The ad hoc committee members are expected to have professional competence and experience, and they adhere to the victim-centred approach. For SEA investigations specifically, due to the sensitivity of the topic, minimum requirement that the investigators complete the Investigating Allegations of Sexual Exploitation and Abuse E-learning.
3. The ad hoc committee shall not include:
  - a) a person who participated in the decision under appeal;
  - b) the subject of investigation;
  - c) the complainant;
  - d) who is subject to a conflict of interest which also applies to the members of the committee;
  - e) to whom any sanction imposed should be enforced.
4. An appeal is well founded if:
  - a) it presents new facts, new evidence, new witnesses; or
  - b) it substantiates that the initial proceedings suffered from some serious procedural error.
5. The ad hoc committee may, by reasoned decision, uphold or alter the original decision or annul it. The ad hoc committee shall send its decision to the Presbytery within 3 days. The Pastor shall inform the person of concern, the subject of investigation of the decision of the ad hoc committee within 8 days. The decision of the ad hoc committee may not be appealed again, but may be appealed by any party outside the congregation (e.g. court, labour tribunal).
6. If the subject of the investigation is one of employers, the Presbytery is entitled to make the decision.

## **XI. Sanctions**

1. If the investigation determines that the person complained against has violated a rule of conduct in the congregation, the pastor may, subject to the decision of the investigating committee, apply the relevant sanction, noting that for confirmed allegations of sexual exploitation and abuse this may amount to dismissal.
2. For other types of confirmed misconduct, the pastor may consider applying the following measures:

- a) Require the subject of investigation not to continue the conduct complained of;
  - b) Require the subject of investigation to attend the sexual exploitation and abuse/abuse of power/harassment/sexual harassment or PSEA training session next arranged by the Congregation;
  - c) Issue a management warning to the subject of investigation;
  - d) take action to remove the subject of investigation about (including expulsion, termination of employment, contract, banishment).
3. If the investigation reveals that the whistleblower or complainant has knowingly made a false report in bad faith, the pastor shall take steps to investigate the misconduct.

## **XII. Information**

1. In order to provide information to members and staff of the congregation, as well as to customers, the congregation shall:
  - a) make the congregation's policies and these procedures available on its website in English and Hungarian
  - b) publish, in a short and plain language, at least in Hungarian and English, at the places where the assembly carries out its activities and on its website, information in a concise and easily understandable form, including at least:
    - the contact details (telephone number and email address) of the person responsible for providing information on ethics and other forms of misconduct (external focal point)
    - how to report complaints and suspicions,
    - the names, titles and contact details (telephone number and email address) of the persons who will receive the report
    - the contact details of external support organisations, authorities and NGOs (see listed in Annex 6).
  - c) directly informing members and staff of the changed rules when they join the congregation and when the rules and procedures are amended
  - d) designate a staff member responsible for providing information on ethics and other forms of misconduct and ensure that he/she receives the necessary training and further training to fulfil this function.

## **XIII. Training**

The congregation shall ensure that its entry-level employees receive training on the standards of conduct expected in the Congregation at starting work, and its employees receive refresher training on this Procedures at least once a year. The training shall take the form of lectures, webinar, e-learning courses, training.

### **Annexes:**

- 1. Form for reporting fraud, bribery and misconduct**
- 2. Complaint report form**
- 3. Template for the confidentiality statement**

4. Text of the acknowledgement e-mail to be sent to the complainant or whistleblower
5. Registration of reports on possible misconducts
6. GBV referral pathways

*Revised and approved on 26 November , 2023*

## Annex 1

### Form for reporting fraud, bribery and misconduct

*The information on this form is highly confidential. Only authorised persons shall have access to the form and the information recorded on it. This form must be stored securely.*

Name of the whistleblower: <i>A report may be made anonymously, but it will facilitate the investigation of cases if the name and contact details <b>of the whistleblower</b> are communicated to the recipient of the report</i>	
Date(s) of the event(s) giving rise to the suspicion:	
Name and title (job title, responsibilities) of the staff member(s) <b>allegedly</b> involved:	
Indication of evidence: (a) names and contact details of witnesses (b) names and availability of documents	
Estimate of the extent of the loss, damage or other prejudice:	
Other relevant information:	

I agree that the data controller of the Budapest-Józsefváros Evangelical Congregation may store my personal data provided when filling in the form until the end of the 5th year after the assessment of the notified case or until the withdrawal of the notification, and process it for the purpose of contacting me as described in the Privacy Policy.

Date:

Signature (optional):

## Annex 2

### Complaint report form

*This form allows you to report sexual exploitation or abuse, abuse of authority, including harassment or sexual harassment at the Congregation or by a Congregation staff member, or if the complainant experiences retaliation after an attempted abuse.*

*Complaints may be filed anonymously (name without identifying the complainant) if the complainant wishes to initiate a general investigation or to investigate a specific incident by identifying the complainant by name.*

*The information contained in this form is highly confidential. Only authorised persons have access to the form and the information recorded on it. This form must be stored securely.*

<b>I. Personal data</b>	
- Name of the complainant or whistleblower (optional)  <i>A report may be made anonymously, but it will facilitate the investigation of cases if the name and contact details of the complainant or whistleblower are communicated to the recipient of the report</i>	
- Contact details chosen, with several options (optional)	
- Details of the complainant: - optional Name: Person description (if name is not known) and status (e.g., staff, volunteer, guest): Additional complainants if the abuse was not committed by a single person:	
<b>II. Case description</b>	
Please describe the incident(s) in as much detail as you can! It may help to state the facts by answering questions about who(s), when (dates), what (dates), where (locations) did (did) it. The case description is not limited in pages or characters, it can be continued on a separate page or sheet.	
<b>III Witnesses (optional)</b>	
Please provide, as accurately as you know, the names or descriptions of possible witness(es) and indicate their status and contact information, as well as any relationship you have (friend, co-worker, acquaintance, etc.)	
<b>IV. Documents, exhibits (optional)</b>	
Please indicate and attach if there have been any communications from the person complained against to you that support the facts (text message, e-mail, letter, social media message or comment, picture or screenshot, etc.)	
<b>V. Other information (optional)</b>	
Are there any previous proceedings related to the case? Please describe if you have reported or contacted others in the congregation, if you have contacted authorities about the incident, and to whom! (optional)	

I agree that the data controller of the Budapest-Józsefváros Evangelical Congregation may store my personal data provided when filling in the form until the end of the 5th year after the end of the 5-year period following the assessment of the reported case or until the withdrawal of the notification, and process it for the purpose of contacting me as described in the Privacy Policy.

Date:

Signature (optional):

**Confidentiality statement**

I,

*name:*

*mother's name:*

*date and place of birth:*

hereby declare, that

1. I agree to be bound by and abide by the rules of ***Procedures for the report and investigation of ethics cases, allegations of harassment and sexual abuse, exploitation, fraud and bribery***
2. I will keep all the information shared with me confidential
3. I will not discuss or share the information with anyone
4. I will keep all information secure while it is in my possession.
5. I comply with the instructions of the Congregation about requirements to physically and/or electronically secure records (including password protection, file/folder encryption, and/or use of secure electronic transfer of records through file sharing, etc.).
6. I will not allow any personally identifiable information to which I have access to be accessible.

Date:

Signature

## **Annex 4**

### **Text of the acknowledgement e-mail to be sent to the complainant or whistleblower**

To be sent within 24 hours of receipt of the report or complaint

**Subject:** (case number)

Your complaint has been received and registered under case number .../202.... The Congregation is reviewing the information and may contact you if more information is required.

Please do not take any investigative steps, unless you are expressly requested to do so by the organization. If you have evidence (such as records or documents) already in your possession, please send those by email. Please quote the case number in the subject line.

Contact info

Signature



**Annex 5**

**Registration of reports on possible misconducts**

Dévai Inn registration of reports and complaints of misconduct					
Date	Registration number (ser.number/year)	Complainant/whistleblower data	Subject of report/complaint	Action taken	Person completing the form

## Annex 6

GBV referral pathways are flexible mechanisms that safely link victims (/survivors) to services that they need and want, including healthcare, psychosocial support, case management, safety/security, and justice and legal aid.

In Hungary, updated GBV referral pathways can be found online at:

- GBV referral pathways in Hungarian: <https://data.unhcr.org/en/documents/details/93364>
- GBV referral pathways in Ukrainian: <https://data.unhcr.org/en/documents/details/93365>
- GBV referral pathways in English: <https://data.unhcr.org/en/documents/details/93204>