Regional Refugee Response
for the Ukraine Situation

VETTING AND REGISTRATION OF VOLUNTEERS AND VOLUNTEER ORGANISATIONS SUPPORTING THE UKRAINE REFUGEE RESPONSE

December 2022

Contents

Background	3
Objective of the present note	4
Terminology	4
The role of host States	5
The role of humanitarian actors	5
Key recommendations for host States	6
Key recommendations for humanitarian actors	11
Additional resources for working with volunteers and volunteer organisations	14
Resources relevant to private accommodation of refugees	14
Annex: Positive practices from the Ukraine refugee response	15

About this document

The note was endorsed and adopted by the Regional Protection Working Group for the Ukraine refugee response on 18 November 2022, following review and consultation with the Task Force on Anti-Trafficking, the Regional Sub-Working Groups on GBV and Child Protection, and the Regional Gender Taskforce. The document is considered a living document which will be regularly updated by the Regional Protection Working Group as promising practices emerge.

COVER PHOTOGRAPH:
On 8 April 2022, Olena and her children prepare to leave the UNCHR and UNICEF-supported Blue Dot centre at Sighetu Marmației, Romania for their next destination., April 2022
© UNICEF/ Alex Nicodim

Background

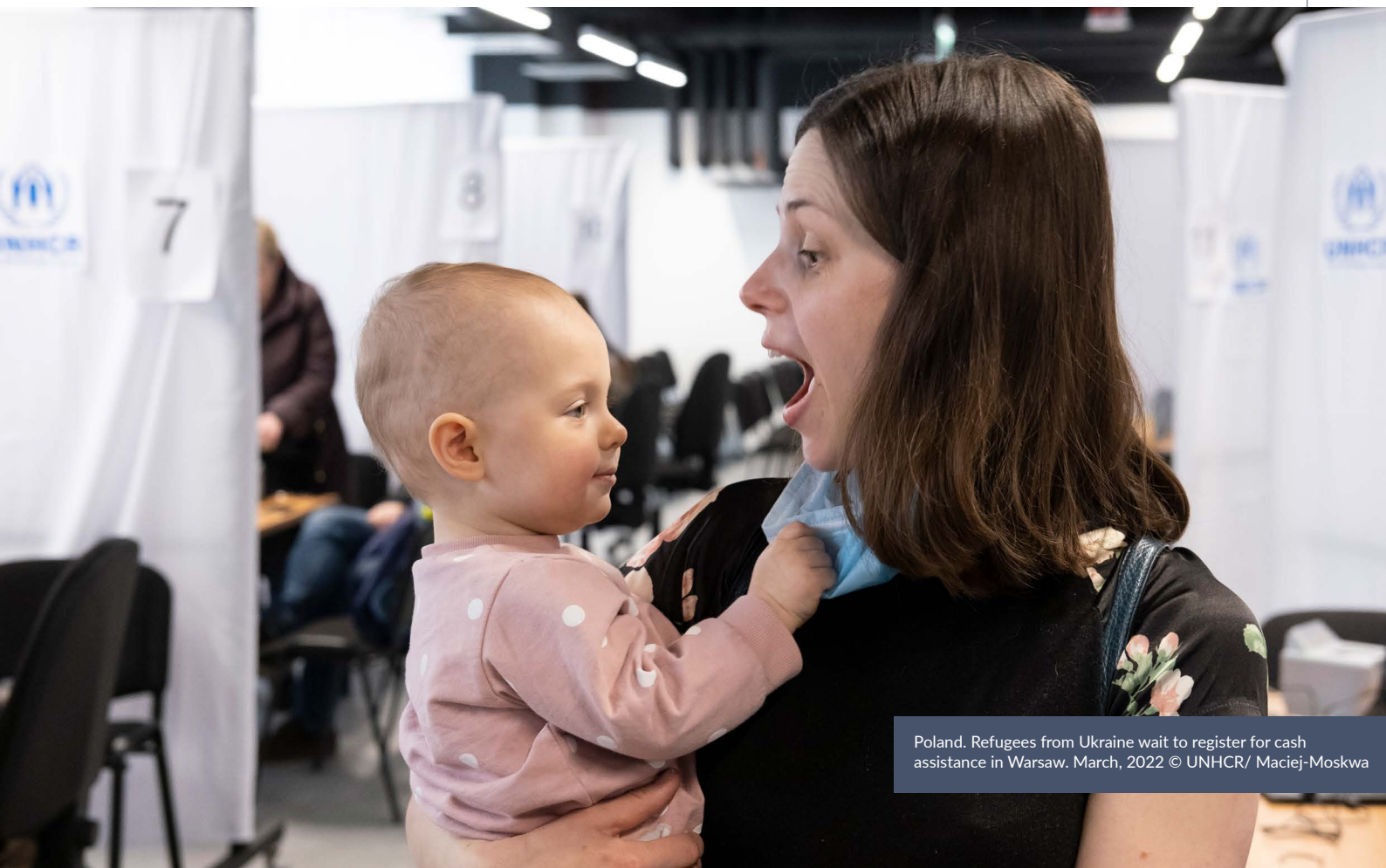
The Ukraine refugee response has seen an **extraordinary outpouring of solidarity**, with volunteers, private companies, and various organisations and groups stepping up to offer support to those fleeing Ukraine, including by offering free transportation, private accommodation, interpretation services, or help in accessing services or finding work.

Volunteers and volunteer organisations have been on the **frontline of the emergency response** since the very first arrivals from Ukraine, filled critical gaps and provided life-saving support.

While this sense of volunteerism is praised and supported, there are also a number of protection risks emanating from the presence of volunteers and volunteer organisations on the frontline of an emergency. **These risks include**, but are not limited to:

- lack of professionalism and adherence to basic humanitarian and protection principles;
- lack of accountability, common standards and coherence in the response;
- heightened risk of gender-based violence (GBV), violence against children, human trafficking, and oth- forms of abuse, including by organised and/or transnational criminal networks;
- heightened risk of persons fleeing from Ukraine of being exposed to sexual exploitation and abuse (SEA) by humanitarian workers;
- spread of inaccurate information, mis/disinformation and harmful rumours, both among persons fleeing Ukraine and in the host community.

It's important to note that **even well-intentioned actions** by volunteers or volunteer organisations can also cause unintended harm. For example, if volunteers are offering material support to individual refugees that is not sustainable in the longer term or that undermines their sense of dignity. Moreover, hosting unaccompanied children in private homes may be to the detriment of family reunification or other care arrangements that are is in the child's best interests, unless this is done as part of family or foster-based care arrangements under the purview of the authorities.



Poland. Refugees from Ukraine wait to register for cash assistance in Warsaw. March, 2022 © UNHCR/ Maciej-Moskwa

Objective of the present note

This document provides **guidance to host States** on the vetting and registration of volunteers and volunteer organisations. It also provides guidance to UN, NGO and other civil society actors on how they can support and complement State efforts through operational activities.

Terminology

Volunteering

is defined as unpaid and non-compulsory work, i.e., "time individuals give without pay to activities performed either through an organization or directly for others".[1]

Volunteers

in the context of this note are private individuals who, at their own will, have chosen to dedicate a significant amount of time to support persons fleeing from Ukraine (beyond their immediate family) without receiving payment (although volunteers may receive incentives or allowances). Volunteers can be refugees themselves, or members of the host community acting in individual capacity.

Vetting

in this context refers to a process of assessing the integrity and suitability of a person or organisation. Integrity may refer to a person's or an organisation's adherence to relevant standards of human rights and professional conduct. Vetting should, at the very minimum, include criminal reference checks and can include checks against specific national databases (such as databases for convicted sex offenders). As an overall objective, the vetting process helps host States and organisations prevent unsuitable people or organisations from working or volunteering as part of the refugee response and placing vulnerable groups at risk.

Registration

in this context refers to the mandatory recording and updating of a person's or an organisation's information in an official registry, in accordance with national law or practice. Registration should be preceded by a vetting process and the information be regularly updated and verified by the appropriate authorities.

1. Definition adopted by the International Labor Organization (ILO), Manual on the Measurement of Volunteer Work, 2011, available online at: https://www.ilo.org/stat/Publications/WCMS_162119

Halyna's destroyed home was repaired by IOM. November, 2022 © IOM Ukraine

The role of host States

The primary responsibility for the physical protection of persons on its territory, including for asylum-seekers, refugees, migrants, and third country nationals, lies with the host State.

The registration and vetting of volunteers and volunteer organisations in official registers fall within the authority and responsibility of that State and needs to be conducted in accordance with national law and procedures.

The role of humanitarian actors

UN agencies, non-governmental organisations and civil society have a role to play in advocating for official vetting and registration procedures with government authorities, and to highlight the potential protection risks in situations where such procedures are not yet in place

Such actors can also contribute and complement this work through; (1) advocacy and technical advice to the relevant authorities and (2) complementing government efforts in, for example, awareness raising and capacity building initiatives (see examples below).

In addition, all humanitarian organisations have the responsibility to carry out vetting processes as part of the recruitment of their own personnel and contractors, including any volunteers working for them; to clearly communicate the expected standards of conduct for humanitarian workers, including the IASC Six Core Principles on SEA;[2] to ensure safe and accessible pathways to report feedback and complaints; including to assess and mitigate risk of SEA and other forms of misconduct.

2. Inter-Agency Standing Committee (IASC), Six Core Principles on Sexual Exploitation and Abuse, available online at: https://psea.interagencystandingcommittee.org/update/iasc-six-core-principles.

Key recommendations for host States

1 DESIGNATION OF GOVERNMENT AGENCY

States are called upon to designate an appropriate government agency to ensure the registration, vetting and oversight of volunteers and volunteer organisations/groups who are working as part of the refugee response, so as to reduce the risks of persons being exposed to sexual exploitation and abuse by humanitarian workers and gender-based violence, trafficking, and other forms of abuses.

A centrally managed database is a good practice to ensure that perpetrators cannot move from one are or organization to the next.

2 OFFICIAL REGISTRATION

States are encouraged to establish (or enhance) mechanisms for registration of volunteers and volunteer organisations/groups and require all volunteers and volunteer organisations/groups that work as part of the refugee response, whether formally or informally, to register accordingly.

This is, in particular, critical for all volunteers and volunteer organisations/groups working at border crossings points, other transit points, and in reception facilities, and private individuals hosting persons fleeing from Ukraine. Data protection and privacy need to be respected for all processing of personal data.

3 VETTING

States should ensure a minimum level of vetting as part of government registration procedures, in line with national law.

This should, at a minimum, include systematic gathering of the basic information about such individuals, organizations and groups, and background checks against criminal records and employment records. It can also include checks against other government registers, reference checks (including references checks with previous employers), and/or individual interviews.

Data protection and privacy need to be respected for all processing of personal data.

Key recommendations for host States

4 IDENTIFICATION

Registered volunteers and volunteer organisations/groups working in border areas, transit points, and reception facilities should be required to carry visible identification, clearly indicating their identity, links to any organisation or government authority, and their official registration with the authorities.

Individuals and organisations not carrying such identification should not be allowed to work in these locations, with enforcement and checks by relevant national authorities.

5 INFORMATION

The designated government entity is encouraged to ensure regular briefings and information provision to all volunteers and volunteer organisations/group working as part of the refugee response, including on the humanitarian principles, the IASC principles on the prevention of sexual exploitation and abuse, and the behaviour expected of volunteers (for example using a volunteer code of conduct and sample leaflet on 'does & don'ts for volunteers'), and where to report any concerns, complaints or potential criminal activities.

UN agencies, non-governmental organisations or other humanitarian actors can be requested to support the designated government authorities with such briefing sessions, as needed.

6 PRIVATE ACCOMMODATION

States should be encouraged to require that any private company or civil society/non-governmental organisation offering accommodation for refugees and other persons of concern has vetting procedures in place for hosts, as well as confidential feedback and complaints mechanisms in case any concerns are raised. This should include private companies and civil society/non-governmental organisations who are matching hosts and guests on online platforms.

Key recommendations for host States

7 ORGANISED TRANSPORTATION

States should ensure that any private company or organisation transporting refugees across or away from official border crossing points, as well as onwards to other countries, are registered with and vetted by the relevant authorities.

Such companies and organisations should be required to provide clear information to potential customers about the destination of the transport, the time expected for the travel, and any costs or documents required. Drivers and staff should carry visible identification and be subjected to registration and vetting as per the above.

8 PRIVATE TRANSPORTATION

At border crossing points, relevant state authorities (police or border guards) should be encouraged to screen, register and track private vehicles who are picking up refugees, for example by requesting identification documents from the driver, and inquiring about the relationship with the persons they are picking up, recording the license plate number, and where they are being transported. It is preferrable if this information is gathered and recorded in standardized and systematic manner.

A reporting back mechanism, confirming safe arrival of the transported persons could also be put in place, where appropriate and feasible, for example through a dedicated digital platform (while ensuring data protection).

9 ENFORCEMENT OF REGISTRATION

States should be encouraged to ensure the presence of trained law enforcement – including, where available, anti-trafficking, child protection and gender/family officers - at all border crossing and other key transit points (train and bus stations) where persons are arriving and passing through to enforce the above, for example by checking that persons who are presenting themselves as volunteers in these sites are appropriately registered and wearing visible identification.

Key recommendations for host States

10 AWARENESS RAISING

States should be encouraged to initiate (or reinforce), with the support of UN agencies, non-governmental organisations or other humanitarian actors, awareness raising and information dissemination related to the vetting and registration procedures in place in the host State, the standards of conduct expected from volunteers and volunteer organisations, as well as information on where and how to report any feedback and complaints, including in relation to sexual abuse or exploitation, potential criminal activities or other incidents. This should include national anti-trafficking hotlines and police hotlines.

11 CHILD SAFEGUARDING

Given the heightened vulnerability of migrant and refugee children, and the responsibility of all persons and organisations working with them to act in a way that does not cause them further harm, host States should ensure that registered volunteers and volunteer organisations/groups in contact with children are aware of and trained in the basic principles of child safeguarding and follow a clear code of conduct when implementing their activities. Organisations and individuals should be expected to act in a way that ensures that the best interests of the child are a paramount consideration at all times. This includes, but is not limited to, strong and visible organisational child safeguarding policies and procedures, including clear expectations around behaviour and conduct. It should also include training in both child friendly communication and adopting a child-sensitive approach, which balances a child's right to individual protection and considers the special needs, views and concerns of each individual child. Where possible, child-friendly information on where and how to report any complaint or reach child protection services, a national anti-trafficking hotline and police hotline, should be made available.

12 GENDER-SENSITIVE INTERVIEWING AND COMMUNICATION

In view of the gendered context of this response, with the majority of Ukrainian refugees being women and children, it is important to ensure gender balance in volunteer recruitment and staffing, both as a mitigating measure and as a protection measure that provides women and girls the choice to seek assistance and help from someone of their own gender. This is especially pertinent when we are looking at specialized personnel at the border who may be interviewing potential female victims of trafficking. In addition, it is crucial that psychological first aid, SEA, GBV and safe referral training is provided to all front-line volunteers and organisations as part of their mandatory training, as they may all come into contact with survivors in the course of their work and should be capacitated to provide referral information in accordance with the minimum guidelines and the "do no harm" principles.

It is also recommended that trauma-informed interviewing trainings be provided to any front-line staff/organization that may be implicated in interviewing/screening/assessing potential trafficking/GBV/SEA cases.

Romania. Art therapy for Ukrainian refugee children, May 2022
© UNHCR/ Andrew McConnell

Key recommendations for humanitarian actors

1 Provide information and capacity building to volunteers and volunteer organisations on registration and vetting procedures, as well as on basic humanitarian and protection standards, the expected standards of conduct for humanitarian workers.

Regular information briefings should also be conducted with volunteers to ensure the sharing of accurate and updated information with refugees and third country nationals.

Contextualize, translate and disseminate guidance or information material on registration and vetting procedures, on working with refugees and with refugee children specifically, humanitarian and protection standards, codes of conduct, and feedback and complaint mechanisms.

2 Enhance partnerships and collaboration with registered and vetted volunteer, civil society and local non-governmental organisations who are working as part of the response, and support their work through additional resources, where needed. It is particularly relevant to engage with women-led volunteer networks or groups.

3 Collect information to identify and analyse trends and evolving protection risks linked to volunteers and volunteer organizations from a gender and intersectional perspective to adequately inform mitigation strategies and awareness raising.

4 Collaborate closely with regional and national coordination mechanisms for anti-trafficking, including for information sharing, analysis and briefing on the vetting and registration procedures and other anti-trafficking measures put in place in the context of the refugee response.

5 Initiate awareness raising/information campaigns and engage in regular dialogue with refugee and host communities on existing registration and vetting procedures and the expected standard of conduct for humanitarian workers and ensure that the voices and views of persons fleeing Ukraine and their host communities are taken into consideration when designing and adapting interventions.

6 Ensure that all humanitarian actors working as part of the response have effective feedback and complaints mechanisms, with procedures in place for the handling of allegations of sexual exploitation and abuse through a victim-centred approach. Information on how to access such mechanisms should be widely disseminated, taking into account gender, age and diversity considerations.

Key recommendations for humanitarian actors

7 Ensure that all organisations deploying volunteers that may come into contact with GBV survivors and persons at risk of GBV have policies, procedures and training in place that cover every aspect of engagement with GBV survivors.

On 16 March 2022, Diana and her two children register at the Blue Dot Hub in the Sighetu Marmatiei border crossing in northern Romania, after having fled the war in Ukraine. © UNICEF /Adrian Holerga

8 Vetting and registration will only go so far in keeping children and other vulnerable groups safe, so it is imperative that organisations deploying volunteers that are in contact with children have robust child safeguarding policies, procedures and training in place. This includes:

- safer recruitment processes to prevent unsuitable individuals from working or volunteering with them;
- risk management processes that enable all activities with children and young people to be risk assessed including identifying safeguarding risks and planning how these will be mitigated;
- policies and processes for responding and reporting any child safeguarding issues and concerns, that are visible and accessible to all, especially children, including those with disabilities;
- expected standards of behaviour in the form of a simple code of conduct or equivalent, that includes clear instructions on behaviours that are expected and prohibited. This should include instructions like not to work alone with children, to work in a way that places children's rights at the heart of everything we do, to work in a transparent and accountable way and to report any concerns immediately to their supervisor or another designated focal point. These standards should also include clarity on the possible consequences of breaching the code of conduct.
- Training and other learning opportunities on child safeguarding so that staff and volunteers know what is expected of them and how to report concerns (through internal procedures and/or to law enforcement authorities, depending on the circumstances and whether there are potential criminal acts);
- Clarity on how volunteers will be supervised when engaging with children;
- Clarity on how children's data will be kept safe.

Additional resources for working with volunteers and volunteer organisations

Volunteer Management in the Red Cross/ Red Crescent (RC)

Volunteering in emergencies: Practical guidelines (RC)

Safer recruitment of volunteers (NCVO)

Tip Sheet: Safe Recruitment (RSH)

How to develop your organizational safeguarding policy (RSH)

How to develop or update your Code of Conduct (RSH)

Sample "Dos and Don'ts" leaflet for volunteers (UNHCR)

Sample Code of Conduct (UNHCR)

Sample Volunteer Code of Conduct to Sign (UNHCR)

Sample 11 Key Safeguarding Messages (UNHCR)

Resources relevant to private accommodation of refugees

Solidarity and housing: Supporting Safe Homes (European Commission)

Housing support for Ukrainian refugees in receiving countries (OECD)

A snapshot of experiences under the Ukraine Family and Homes for Ukraine Sponsorship schemes in the (Seeking Sanctuary)

Annex: Positive practices from the Ukraine refugee response

In **Romania**, the Directorate for Emergencies requires prior registration of all busses and minibuses that are transporting persons away from official border crossing points. They have an office at the border to verify these registrations. In addition, the local police conduct spot checks of private vehicles that are picking up individuals, through identity checks and quick interviews. Photos are taken of the identity documents of the driver and the vehicle registration number and recorded.

In **Hungary**, the PSEA Task Force developed and translated a Volunteer Undertaking and Code of Conduct to sign for volunteers, and 11 Key Safeguarding Messages (available here: https://data.unhcr.org/en/situations/ukraine/location/10783).

In the **Czech Republic**, the Act on Volunteer Services regulates the work of volunteers, including the requirement for an organisation using volunteers to obtain formal accreditation through a multi-functional Accreditation Committee (see Article 6 of the law, available here: https://www.legislationline.org/documents/id/5788).

In **Poland**, the PSEA Network conducted a PSEA risk assessment in May 2022, which included a survey of existing vetting mechanisms among members of the network.

At regional level, **European Commission** issued the safe homes guidance "Solidarity and housing: Supporting Safe Homes Considerations, key principles and practices" for private individuals hosting persons fleeing Ukraine (available here: https://home-affairs.ec.europa.eu/safe-homes-guidance_en).

UNHCR issued a **"Dos and Don'ts"** leaflet for volunteers in the Ukraine response (available here: https://data.unhcr.org/en/documents/details/95498).

UNICEF worked in partnership with the **World Organisation of Scout Movement (WOSM)** ensuring high child safeguarding standards were applied throughout all agreed activities in support of Ukrainian refugee children involving staff and volunteers. Based on best safeguarding practice and a common agreement on how WOSM global safeguarding policy should be applied at a local and national level to ensure consistently high standards, WOSM was supported around codes of conduct for adults and children, supervision of children and young people, reporting mechanisms for safeguarding concerns and recruitment, training and supervision of local volunteers. As a result, 500 summer camps and activities were organised safely from June to August 2022 in 9 countries for an approximate number of 21,105 children out of which approximately 8,347 were Ukrainian.

Regional Refugee Response
for the Ukraine Situation

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

December 2022