Toolkit to Support Implementation of the OECD DAC Recommendation on Ending Sexual Exploitation Abuse and Harassment

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Foreword

In 2018, several high-profile SEAH allegations drew attention to the underlying sexual- and gender-based violence that continues to be perpetrated across the development and humanitarian ecosystem, driving home the urgent need to improve SEAH prevention and responses. The OECD Development Assistance Committee (DAC) received requests from its Network on Gender Equality (GENDERNET), as well as from other parts of government, to share approaches for dealing with ongoing abuse and addressing systemic weaknesses. In June 2018, the Secretariat and DAC Members adopted a plan to develop a new legal instrument. That same year, the Committee released a *Declaration on Preventing Sexual Exploitation and Abuse (SEA)* at their informal, high-level Tidewater meeting. With the Secretariat's support, Members launched the DAC Reference Group on Preventing SEA (later renamed the DAC Reference Group on Ending SEAH; hereafter "DAC Reference Group") in September 2018, opening it to multilateral institutions, international financial institutions (IFIs), civil society organisations (CSOs) and other experts.

On 12 July 2019, the *Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance* was adopted by the 30 DAC Members. Since then, Lithuania and Estonia have joined the Committee, and therefore adopted the DAC Recommendation bringing the total to 32 DAC members. Four United Nations organisations have also adhered: UNICEF, UNHCR, UNFPA, and UNOPS.

DAC members have mandated GENDERNET to oversee the implementation of the new standard, underpinned by a robust peer learning process. They also emphasized their own roles in supporting the dissemination of the Recommendation in their countries, requesting Secretariat support in developing briefing materials.

This Toolkit synthesises learning and examples gathered from DAC members and partners, including their work through international fora such as the OECD, as well as additional research. It aims to support DAC members and partners in deepening their work and accelerate progress on any number of topics contained within the DAC Recommendation's six pillars. Progress in SEAH prevention and response can be very incremental and difficult to measure, in part because it relies on addressing the many underlying factors that support the perpetuation of SEAH, such as cultural and social norms, as well as power dynamics. This Toolkit aims to support progress by DAC members on both technical and political levels, as well as support their coordination efforts with their partners to work towards long-term, sustainable change.

The development of this Toolkit has benefited from the input of DAC members and partners, and the DAC Reference Group, including feedback and input from experts across governments and all actors involved.

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Introduction

The perpetration of sexual exploitation, abuse, and harassment (SEAH) is systemic and continues across many societies and contexts. As a form of gender-based violence (GBV) and an abuse of power, SEAH inflicts harm not only on individuals but also on families and entire communities; and it is equally a human rights violation.

In development and humanitarian contexts, and for those working in the development and humanitarian sectors, abuse by perpetrators is not new. In recent years, prompted in part by a number of highly publicised SEAH cases in the development and humanitarian sectors, donors and partners have reiterated their commitment to zero tolerance to inaction with regard to SEAH. Individually and collectively, governments, international organisations, and civil society have an important role to play in SEAH prevention and response. Actors across the development community and beyond have increased efforts to ensure safer environments and to prevent SEAH within their agencies, as well as within partner organisations, civil society groups, and other bodies running development programmes or delivering humanitarian aid in partnership.

However, efforts so far to set up policies, systems, and codes of conduct to end SEAH have not been enough to ensure effective prevention and response or provide victim/survivors with comprehensive support. Gaps in actors' understanding of their obligations persist: from the need for senior management to foster organisational change and leadership on this issue at multiple levels, to having an overarching policy framework, to enforcing rigorous standards among staff and partners, to ensuring that confidential and safe complaints mechanisms are in place in-country.

In this context, this Toolkit aims to support further progress by all actors, but also to support wider shifts in the overall environments within which they operate and also within their institutions, by stressing the following dimensions:

- Sexual exploitation, abuse, and harassment do not exist in isolation. It is important to understand the overall framing and underlying factors that allow for SEAH to continue to be perpetuated.

- Power imbalances, gender inequality, and patriarchal structures across society create enabling environments for SEAH. The six pillars of the Recommendation recognise that SEAH is deeply rooted in structures of gender inequality and discrimination, and stresses the need to ensure a victim/survivor-centred approach grounded in a gender equality agenda.

- Governments, partners, and actors cannot adequately tackle SEAH without looking inward at their own institutions and addressing harmful gender norms and discriminatory practices, as well as ensuring gender balance in positions of power.

- Moreover, given that many donors work with partner organisations in development and humanitarian contexts, those organisations too must have adequate policies, structures, and resources to prevent and respond to SEAH in place. Continuous dialogue, support for capacity building, and tools to assess and monitor partners are therefore key. To the extent that aid programmes can be designed together with partners in ways that empower women and shift

gender norms towards greater equality, they can also support reductions of SEAH and contribute to a preventative culture shift over the longer term.

- Prevention of, and response to SEAH are inextricably linked. As actors make put in place stronger response systems, they need to focus on how these actions can better support prevention, and stop abuse from happening in the first place.

- The DAC Recommendation addresses both sexual exploitation and abuse (SEA) and sexual harassment (SH)[1] together, as it recognises that although SEA and SH differ in many ways, including in terms of context and relationships between the victim/survivor and perpetrator, the root causes of each remain similar. The connection between SEA and SH also re-emphasises the need for DAC members and other institutions to consider both how they aim to prevent and react if and when cases of SEA arise in development and humanitarian contexts, but also how there is a connection between their capacities for reacting when or if cases of SH arise within their own institutions. Organisational culture and effective systems have an impact both internally and externally.

This Toolkit aims to support the implementation of the DAC Recommendation and recognises the importance of working across government departments and across sectors. While the Recommendation itself is focused on the humanitarian and development sectors, effective prevention and response require actions across development, humanitarian, and peacekeeping sectors, as well as other related sectors. Within institutions, this means not only reaching across to policy experts in many fields (gender equality, governance, health, etc.), but also those working in other fields related to ethics, human resources, and legal capacities.

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[1] Sexual exploitation & abuse (SEA) tends to describe varying forms of sexual misconduct perpetrated by an individual leveraging their comparative power or trust over someone else for sexual purposes. The difference between 'exploitation' and 'abuse' tends to be the nature of the misconduct but may also depend on the victim/survivor. For example, if a child is the victim/survivor, this is de facto sexual abuse. Sexual harassment is unwanted sexual behaviour in a work environment. For example, where the victim/survivor and the alleged perpetrator belong to or operate in the same professional community. In many cases, SH is interpreted to be cases within an institution, whereas SEA is perpetrated in development or humanitarian contexts. For further elaboration, please refer to the *Foundational Terms* section below.

Foundational Terms and Documents

- **Aid beneficiaries or recipient** refers to a person who receives assistance as part of either emergency relief or development aid through assistance programmes, who are part of the "affected population" or community to which the agency is providing assistance.
- **Child**: For the purpose of this note 'child' is defined as a person under the age of 18, regardless of the age of majority or age of consent locally.
- **Child protection**: the prevention of, and response to, exploitation, abuse, neglect, harmful practices and violence against children
- **Complainant** In the context of allegations of sexual exploitation and abuse, a complainant is commonly understood as a person who brings an allegation to the attention of staff or related personnel in accordance with established procedures. The complainant may be a survivor of sexual exploitation and abuse or someone who is aware of the wrongdoing.
- **Gender** refers to "the roles, behaviours, activities, and attributes that a given society at a given time considers appropriate for men and women. In addition to the social attributes and opportunities associated with being male and female and the relationships between women and men and girls and boys, gender also refers to the relations between women and those between men. These attributes, opportunities and relationships are socially constructed and are learned through socialisation processes. They are context/ time-specific and changeable (…)." (UN Women, n.d.[1])Not all individuals identify with a binary concept of sex or gender categories of male and female, masculine and feminine. Gender and sex are related to, but different from, gender identity. Gender identity refers to a person's deeply felt, internal and individual experience of gender, which may or may not correspond to the person's physiology or designated sex at birth.
- **Gender equality** refers to the "equal rights, responsibilities and opportunities of women and men and girls and boys. Equality does not mean that women and men will become the same but that women's and men's rights, responsibilities and opportunities will not depend on whether they are born male or female. Gender equality implies that the interests, needs and priorities of both women and men are taken into consideration, recognising the diversity of different groups of women and men" (UN Women, n.d.[1])
- **Gender-based violence (GBV)** is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) roles between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. Acts of GBV violate a number of universal human rights protected by international instruments and conventions. Many—but not all—forms of GBV are criminal acts in national laws and policies; this

differs from country to country, and the practical implementation of laws and policies can vary widely (IASC, 2015[2]).

- **International development agency** (also referred as donor or agency) refers to government line ministries or other public or private agencies entrusted with the responsibility of disbursing public funds that are accounted for as Official Development Assistance (ODA).

- **Intersectionality** is a theoretical framework that suggests that social identifiers (such as race, ethnicity, faith, socioeconomic status, class, caste, geographic location, age, ability, sexual orientation, religion, migration status and gender) come together, or intersect, at a micro level to result in an individual's lived experience. This experience is considered within the various social, institutional, and structural systems of privilege that reinforce oppression (sexism, ableism, racism). Such a framework encourages more comprehensive study and analysis, and allows for a greater understanding of how this information can be utilized to inform policy and programmes and benefit those who are experiencing disproportionate levels of marginalization, discrimination, or barriers.

- **Implementing partners** refers to government's line ministries or other public state agencies, as well as partners of international development agencies such as developing countries' governments, public bodies including local authorities, non-governmental and civil-society organisations, trade unions, multilateral development and humanitarian organisations, and suppliers of good and services involved in implementing aid projects or programmes or private-sector organisations recipient of aid funds.

- **"Retaliation" or "retaliatory action"** means any direct or indirect detrimental action recommended, threatened or taken because an individual has reported a suspicion of alleged misconduct or participated in an authorized audit or investigation. Retaliation may include adverse administrative actions, such as, but not limited to, unwarranted poor performance evaluations, changes in job duties or other negative decisions affecting the individual's terms and conditions of employment. Retaliation may also take the form of verbal abuse or harassment or isolation in a community or workplace.

- **Sexual Abuse** as adapted from the UN Secretary-General's bulletin ST/SGB/2003/13: means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with children (as defined under the UN Convention on the Rights of the Child as any person under the age of 18) is considered to be sexual abuse, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defence;

- **Sexual Exploitation**, adapting from the UN Secretary-General's bulletin ST/SGB/2003/13, constitutes any actual or attempted abuse by personnel (of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another). It is a broad term, but it includes transactional sex, solicitation of transactional sex and exploitative relationships;

- **Sexual Harassment,** as adapted from the UN Secretary-General's Bulletin on Addressing discrimination, harassment, including sexual harassment, and abuse of authority (ST/SGB/20198), and the UN System Model Policy on Sexual Harassment: "any unwelcome conduct of a sexual nature that might reasonably be expected, or be perceived to cause offence or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing the reasonableness of expectations or perceptions, the perspective of the person who is the target of the conduct shall be considered. Sexual harassment is the manifestation of a culture of discrimination and privilege based on unequal gender relations and other power dynamics. Sexual harassment may involve any conduct of a verbal, nonverbal or physical nature, including written and electronic communications. Sexual harassment may occur

between persons of the same or different genders, and individuals of any gender can be either the targets or the perpetrators. Sexual harassment may occur outside the workplace and outside working hours, including during official travel or social functions related to work. Sexual harassment may be perpetrated by any colleague, including a supervisor, peer or a subordinate. A perpetrator's status as a supervisor or senior official may be treated as an aggravating circumstance… Sexual harassment can take a variety of forms – from looks and words to physical contact of a sexual nature." \

- **Sexual misconduct** is used by some institutions to refer to all acts of SEA and SH, but is not a universally accepted definition.

- **Victim/survivor** refers to a person who has experienced sexual exploitation or abuse, or harassment. The definition of SEAH victim/survivor is interpreted differently by different institutions. Depending on the individual and the interpretation, the terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support. The term victim/survivor has been used by many to put forward an inclusive range of views [see pillar 2 for further discussion].

- **Whistle-blower** refers to an individual who reports a concern regarding wrongdoing. Whistle-blowers provide information, based on a reasonably held suspicion that wrongdoing has occurred.

- **Zero tolerance** for sexual exploitation and abuse, adapting from the UN Secretary General's bulletin ST/SGB/2003/13 and Special Measures report (A/71/818): refers to a policy that prohibits sexual exploitation and abuse by personnel and that every transgression will be acted upon, without exception. Sexual exploitation and abuse violate universally recognised international legal norms and standards, and are therefore defined as unacceptable behaviour and prohibited conduct which constitute acts of serious misconduct that are grounds for disciplinary measures including summary dismissal[2].

Foundational documents cited in the DAC Recommendation:

- The Recommendation of the Council on Gender Equality in Education, Employment and Entrepreneurship [OECD/LEGAL/0398]; the Recommendation of the Council for Development Co-operation Actors on Managing the Risk of Corruption [OECD/LEGAL/0431]; the Recommendation of the Council on Gender Equality in Public Life [OECD/LEGAL/0418]; and the DAC Recommendation on the Humanitarian-Development-Peace Nexus [OECD/LEGAL/5019];

- International instruments on various aspects of gender equality and human rights, notably the principles embodied in the Universal Declaration of Human Rights and relevant provisions of International Humanitarian Law, including the Geneva Conventions and protocols thereto; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; the United Nations (UN) Convention on the Rights of the Child; the UN Convention on the Elimination of All forms of Discrimination against Women; the UN Declaration on the Elimination of Violence against Women (A/RES/48/104); the UN Comprehensive Strategy on Assistance and Support to Victims of Sexual Exploitation and Abuse by UN Staff and Related Personnel (A/RES/62/214); the UN Protocol on Allegations of Sexual Exploitation and Abuse involving Implementing Partners; the 2018 UN General Assembly Resolution on Intensification of

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[2] Definitions are taken from a variety of sources, including: the IFRC Secretariat Policy on Prevention and Response to Sexual Exploitation and Abuse, Pledge on Prevention and Response to Sexual Exploitation, Abuse and Sexual Harassment and/or IASC Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action.

The Human Rights Campaign, Glossary of Terms: Glossary of Terms - Human Rights Campaign

efforts to prevent and eliminate all forms of violence against women and girls: sexual harassment (A/RES/73/148); and the Council of Europe Convention on preventing and combating violence against women and domestic violence;

- Relevant political commitments made within the UN context, including the 2030 Agenda for Sustainable Development; the 1994 Programme of Action of the International Conference on Population and Development; the 1995 Beijing Declaration and Platform for Action of the Fourth UN World Conference on Women and the outcome documents of their review conferences;

- The UN efforts to prevent and respond to SEA and SH, including the UN Secretary General's Report on Special Measures for Protection from Sexual Exploitation and Sexual Abuse: A new approach (2017); the UN Secretary-General's Bulletins on: Special Measures for protection sexual exploitation and sexual abuse (2003), Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority (2008), and Protection against retaliation for reporting misconduct and for co-operating with duly authorized audits and investigation (2017); UN Security Council Resolutions on Women, Peace and Security, including Resolution 1325 (2000) and subsequent resolutions up to and including Resolution 2242 (2015); Model Policy on Sexual Harassment (2018); as well as the important work done by the UN Special Coordinator on improving the UN response to SEA, the UN Victim's Rights Advocate, the UN Trust Fund in Support of Victims of SEA, the Voluntary Compact between the UN Secretary General and individual Member States, the Circle of Leadership on the Prevention of and Response to sexual exploitation and abuse in United Nations operations, the Civil Society Advisory Board on prevention of sexual exploitation and abuse, and the Grand Bargain's Agenda for Humanity (2016); and the Charter on Inclusion of Persons with Disabilities in Humanitarian Action (2016);

- The Inter-Agency Standing Committee's Principles and Minimum Operating Standards on Prevention of Sexual Exploitation and Abuse (MOS-PSEA), and the Core Humanitarian Standard on Quality and Accountability (CHS), as essential international standards;

- The UN Comprehensive Strategy on Assistance and Support to Victims of Sexual Exploitation and Abuse by UN Staff and Related Personnel (A/RES/62/214)

Reader's Guide

Since its adoption, the DAC Reference Group and OECD Secretariat has supported members and partners in peer learning and exchange, and guiding implementation of the Recommendation. This *Toolkit to Support Implementation of the OECD DAC Recommendation on Ending Sexual Exploitation Abuse and Harassment* is organised around the pillars of the Recommendation and reflects learning and good practice examples across the six pillars:

Pillar 1. Policies, professional conduct standards, organisational change, and leadership

- This section provides learning and commentary on Pillar 1 of the Recommendation. It describes how to develop policies and professional conduct standards with a focus on organisational change and leadership on ending SEAH in the provision of international aid.

Pillar 2. Survivor/victim-centred response and support mechanisms

- This section provides pathways for improving support systems for victims/survivors of SEAH through learning and commentary on Pillar 2 of the Recommendation. It describes ways to prioritise a victim/survivor-centred approach in all actions to prevent and respond to SEAH and focuses on how to integrate this approach across institutional frameworks; and provide comprehensive to support victims/survivors.

Pillar 3. Organisational reporting, response systems, and procedures

- This section provides a commentary on Pillar 3 of the Recommendation. It describes how to establish organisational reporting and response systems and procedures for the prevention of and response to SEAH.

Pillar 4. Training, awareness raising, and communication

- This section provides guidance on training, outreach efforts and awareness raising activities both amongst staff in governments, and implementing partners, as well as communication efforts with the wider community. Pillar 4 of the Recommendation highlights the importance of conducting training, raising awareness, and communicating on SEAH prevention.

Pillar 5. International coordination

- This section provides an overview of pathways for improving international coordination for SEAH prevention and response, which is Pillar 5 of the Recommendation. This includes coordination internationally across stakeholders; reinforcing existing commitments as a policy basis for action; supporting assessments of the performance of organisations; and dedicated resources to realising the goals of the Recommendation.

Pillar 6. Monitoring, evaluation, shared learning, and reporting

- This section provides learning on Pillar 6 of the Recommendation. It describes how to develop mechanisms for monitoring, evaluation, learning and reporting on the results of SEAH prevention and response and use of data.

Each section ends with a 'checklist' which provides useful questions for members ask and consider, when working to improve their efforts for SEAH prevention and response. Examples of good practices are included in tables and figures throughout the Toolkit.

Abbreviations and acronyms

AICS	*Agenzia Italiana per la Cooperazione allo Sviluppo* (Italian Agency for Development Co-operation)
BMZ	*Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung* (Federal Ministry for Economic Cooperation and Development, Germany)
CEB	Chief Executive Board (UN)
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CHS	Core Humanitarian Standard on Quality and Accountability
CSO	Civil society organisation
CRPD	Convention on the Rights of Persons with Disabilities
CRS	Creditor Reporting System (OECD)
CSW	Commission on the Status of Women
DAC	Development Assistance Committee (OECD)
DEG	Deutsche Investitions und Entwicklungsgesellschaft (Germany)
DFI	Development Finance Institution
DFAT	Department of Foreign Affairs and Trade (Australia)
DfID	Department for International Development (The United Kingdom)
ESEAH	Ending Sexual Exploitation Abuse and Harassment
EU	European Union
FAO	Food and Agriculture Organization
FCDO	Foreign, Commonwealth and Development Office (The United Kingdom)
FDFA	Swiss Federal Department of Foreign Affairs
GAC	Global Affairs Canada
GBV	Gender-based violence
GENDERNET	Network on Gender Equality (OECD-DAC)
GIZ	*Deutsche Gesellschaft für Internationale Zusammenarbeit* (Germany)
HDP	Humanitarian-Development-Peace
IASC	Inter-Agency Standing Committee
ILO	International Labour Organization
INCAF	International Network on Conflict and Fragility (OECD-DAC)

IPPF	International Planned Parenthood Federation
JICA	Japan International Cooperation Agency
LGBTQIA+	Lesbian, gay, bisexual, transgender, queer, intersex and asexual, plus other self-identifying members of the community
LNOB	Leave no one behind
MOS-PSEA	Inter-Agency Standing Committee Minimum Operating Standards
MDB	Multilateral development bank
MFA	Ministry of Foreign Affairs
NGO	Non-governmental organisation
OCHA	Office for the Coordination of Humanitarian Affairs (UN)
ODA	Official development assistance
OECD	Organisation for Economic Co-operation and Development
OHCHR	Office of the High Commissioner for Human Rights (UN)
OVRA	Office of the Victims' Rights Advocate (UN)
PSEA	Prevention of Sexual Exploitation Abuse
RG	Reference Group (DAC)
SDC	Swiss Agency for Development and Cooperation
SDGs	Sustainable Development Goals
SEA	Sexual Exploitation and Abuse
SEAH	Sexual Exploitation, Abuse, and Harassment
SH	Sexual Harassment
Sida	Swedish International Development Cooperation Agency
SOGIESC	Sexual Orientation, Gender Identity and Expression and Sex Characteristics
SRHR	Sexual and Reproductive Health and Rights
UN	United Nations
UNDP	United Nations Development Programme
UNICEF	United Nations Children's Fund
UNHCR	United Nations Refugee Agency
UNFPA	United Nations Population Fund
USAID	United States Agency for International Development
UNSCR	UN Security Council Resolution
VRA	Victims' Rights Advocate (UN)
VAWG	Violence Against Women and Girls
WEE	Women's Economic Empowerment
WHO	World Health Organization
WPS	Women, Peace, and Security

1 Pillar 1 – Policies and professional conduct standards, organisational change, and leadership

Pillar one of the DAC Recommendation highlights the importance of leadership, integrity, and clear institutional mechanisms addressing SEAH, including policies, ethical operational standards, codes of conduct, and explicit communication with staff and management. Pillar one also recognises how an organisation's culture is defined in part by these elements, and contributes to the prevention of, and response to sexual exploitation, abuse, and harassment.

Improved organisational culture to address SEAH requires change starting at the top, with organisational leadership, and requires high-level political will to achieve deep system change throughout an organisation. However, everyone takes part in establishing a safe environment, and organisational culture that is built on trust, integrity, and respect.

Organisational culture and norms

As per the DAC Recommendation:

> *1.a Foster improved organisational culture and norms through effective value-based leadership and guidance on goals, values, behaviours and expectations related to SEA and SH prevention and response; including in the promotion of inclusive, non-discriminatory, gender balanced work environments and opportunities; and by encouraging the recruitment and career development of women in senior leadership and throughout organisations.*

Why does organisational culture matter?

Sexual exploitation, abuse, and harassment are manifestations of power imbalances and abuse of power, in particular related to gender inequality. All societies, and all organisations, are characterised by systemic inequalities. Abuse is also often facilitated by impunity; and is made possible by insufficient roadblocks rooted in the values held in an organisation's culture.

Safe working environments are essential to preventing all forms of abuse of power. This safety is built on values of **integrity**, **openness**, **trust**, and **respect** which counteract impunity, supporting clear, fair, and appropriate responses when a wrong or harmful action is perpetrated. Unsafe working environments have many integrity-related issues and forms of misconduct, including but not limited to, SEAH.

When establishing SEAH prevention and safeguarding, institutions may overlook the 'bigger picture' of organisational culture, and instead only focusing on targeting specific power dynamics. However, only by stepping out of isolated groups and looking at the organisation as a whole can staff fully understand and

address the potential impact of power dynamics and the interconnection of multiple integrity issues, such as anti-corruption, anti-racism, anti-bullying, decolonisation, and anti-slavery.

Social norms

Social norms are underlying ideologies and informal rules of behaviour in a group deeply entrenched in people's culture and identity, cutting across sectors, and conditioning a large number of behaviours. They are driven by beliefs we have about how people valuable to us think, behave, and what they expect of us, which in turn guide how we behave in specific situations. These have a direct and strong influence on an individual, ultimately deciding what is acceptable or appropriate and what is "normal," and are expressed through several social norms and practices – for example gender inequity and patriarchy expressed through gender-based violence, and structural elements – power differentials institutionalised in laws and systems. This is why working on social norms to transform harmful behaviour is increasingly gaining the attention of practitioners and organisations (UNICEF, 2019[3]).

Creating safe and protective environments

Organisational culture is shaped by several factors, including an institution's established policies and processes. Explicit policies, standards, codes of conduct, and ethical norms have an important impact on the culture within organisations, and externally, including how it operates with implementing partners. These policies and standards need to be communicated and monitored regularly within the organisation in order to be effective. The linkage is clear: organisational culture informs policy, and policy contributes to organisational cultural change.

By developing strong leadership, clear standards, codes of conduct, regular communication, and action to tackle wrong-doing, organisations can transform their culture into safe places for all staff and beneficiaries. An organisation should also tackle harmful social norms that underpin SEAH. Organisations can empower women, encourage diversity, and be mindful of inter-sectional considerations, such as race, nationality, class, professional status or sexual orientation, which increase a person's likelihood of experiencing abuse (Rimal and Real, 2005[4]).

An **open** organisational culture means that all employees, managers, and leaders can regularly engage in conversations free from fear of retaliation when raising questions, concerns or ideas regarding reporting and/or preventing misconduct (Morrison, 2014[5]). Safe and inclusive working environments are spaces where staff, beneficiaries, and community members know how to share concerns and suggestions, and feel safe and empowered to do so. They are environments in which leadership is willing to engage in difficult conversations when uncomfortable challenges are raised. Setting a clear tone at the top for internal culture and organisational values supportive of integrity, diversity, inclusion, and gender equality – is essential for the transfer of values and requirements of all staff within and between institutions, and to external partners.

Research shows that bystanders may be willing and able to act, but avoid doing so if there is not a trusting relationship between implementers and community members, or the organisational culture does not feel safe (Shea et al., 2021[6]). Ethical policies, a focus on gender equality, holding regular dialogues with beneficiaries and community members, and creation of integrated frameworks to address sexual exploitation, abuse and harassment can provide important support for bystanders so they raise concerns.

Ultimately, safe working and implementing environments encourage a "speak up culture"[3] in which any act of abuse of power such as sexual exploitation, abuse and harassment is responded to appropriately, and where staff regulate their own behaviour and the behaviour of colleagues.

Recent research from Steering Committee for Humanitarian Response (SCHR) on organisational culture on PSEAH found there is often a broad perception that a lack SEAH complaints is positive, and rarely gives rise to further introspection over reporting mechanisms and the existence of a speak-up culture. Underreporting is routinely under-scrutinised, both of which stifles the creation of a safe environment where SEAH can be reported. Furthermore, it was found that there is a gap between leadership's perception of a well-functioning speak-up culture on SEAH and the perception of staff. Staff tend to be more cynical as to whether PSEAH is taken seriously (SCHR, 2024[7]) .

An organisation that is **trusted** is one where people feel an organisation is competent and caring: competent in terms of its reporting and investigation systems and the capacity required to respect confidentiality; and caring in terms of its commitment to victim/survivor-centred support (regardless of the status of the investigation and its evidence) and protection from retaliation.

Box 1.1. Understanding effective safeguarding culture: the importance of organisational culture and values

Organisational culture is the basis for safeguarding against SEAH to be practiced well in an organisation: where people are and feel safe to engage and anyone in, or impacted by, an organisation is empowered to report concerns wherever they may arise. **Bond** (a UK network of civil society organisations working in international development) developed a tool that classifies behaviours: starting from those that are often indicative of an organisational culture that is not aligned (or "non-compliant") with good safeguarding practice; to behaviours that are likely to be indicative of a culture where best safeguarding practice is **genuinely valued** and is part of the lived experience of those within, or impacted by, the organisation.

When people try to describe behaviours that are indicative of a positive safeguarding culture within their organisation, they often describe behaviours that are more **indicative of compliance**. Most organisations still meet a minimal standard of compliance, rather than having an **effective organisational culture and values** that have a real impact on behaviours.

This tool covers 6 areas:

1. **Policies and procedures**
2. **Safer programming**
3. **Survivor-centred approach**
4. **Awareness raising**
5. **Safer recruitment**
6. **Reporting**

Source: Bond (2021[8]), Understanding effective safeguarding culture, Understanding effective safeguarding culture.

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[3] "Speak up culture" refers to a healthy, supportive environment, where team members feel free to share their ideas, opinions and concerns, without fear of retaliation or penalty.

Box 1.2. UNHCR Initiatives on organisational and workplace culture to tackle SEAH

UNHCR has invested much effort and resources around tackling SEA and SH by directly addressing root causes embedded in organisational and workplace culture. During his tenure as IASC Champion on PSEA and SH, the High Commissioner for Refugees launched a number of initiatives around supporting leaders in the sector to address the root causes of sexual misconduct through dialogue and engagement on organisational culture, including through the development of **a Communications Package** for IASC Principals, the development of a Facilitators' Guide for Session on Values, Attitudes and Org Culture (with multiple closed door sessions have been held with groups of leaders across the humanitarian and development sectors to unpack underlying elements of power and gender differentials), and the publication of IASC Promising Practices on Organizational Culture Change.

UNHCR has also promoted and supported the work of grassroots initiatives such as **StrongerTogether, Men4Change** and **Women and Change**, which have helped facilitate engagement by staff on issues related to behaviour, values, masculinities, sexual harassment, racism, unconscious bias, among others, which are directly linked to toxic organisational culture when left unaddressed. Until 2021, UNHCR held **Reflective Leadership Dialogues**, a learning initiative intended to engage managers on issues related to building safe and inclusive teams and workplace environments. While it is difficult to measure the level of success of such initiatives, as work around culture requires a long-term investment and sustained commitment, the buy-in from leadership to set the tone at the top (including through UNHCR's **Town Hall Meetings** with senior leadership), along with the evolution of existing and new initiatives is a clear indication that more space is being created and filled by colleagues invested in tackling issues of organisational culture that underlie sexual misconduct.

Source: UNHCR

Key Actions

Changing culture requires vision, objectivity, and a willingness to change. The following actions will contribute to creating safe environments in which sexual exploitation, abuse, and harassment are addressed. Organisations should regularly self-assess and consider the needs of environment to ensure they have the following essential factors in place to change their organisational culture.

Table 1.1. Key actions to create safe environments

Actions	Tips
Clear SEAH policies and communicated organisational values	Organisations and their leadership need to clearly and publicly articulate their values, principles, and institutional framework on SEAH (including an overarching SEAH strategy or policy and supportive ethical frameworks including codes of conduct). These should be consistently reinforced and easily understood by all actors. Creating a strong and supportive internal organisational culture is important to guarantee the values of the organisation extend to external partners and local communities.
	For example: a safe environment is supported by an organisation's relevant communications and consistent messaging on values such as, their commitment to zero tolerance for inaction and accountability, and respect and equality for all staff and beneficiaries (Box 1.1. Understanding effective safeguarding culture: the importance of organisational culture and values).
Effective reporting and response process	Robust, accessible, and safe reporting systems are essential to creating a culture that supports ending SEAH.

Actions	Tips
	It is crucial that all staff and partners are clear on operating systems and procedures and consider these reliable and predictable. Moreover, it is important to communicate that there will be no retaliation towards those who report. Responses to SEAH incidents should be timely and appropriate, include support to victims/survivors, and when necessary, include disciplinary measures. These actions builds trust in SEAH policies and reporting mechanisms.
Gender-balanced, relevant, diverse, and inclusive teams	Women and others who may be marginalised remain underrepresented in higher positions within politics and international and multilateral organisations. Ensuring meaningful and relevant representation in leadership and decision-making positions is the first step in ensuring an inclusive environment. There is a growing body of evidence that the presence of women in leadership positions may lead to fewer cases of sexual harassment, abuse, and exploitation (Au, Tremblay and You, 2021[9]). At the same time, men also need to be gender sensitive and address issues of toxic masculinities within the organisation.
Accountability in recruitment practices	Establish safe recruitment and hiring practices. Make SEAH safeguarding part of the employment cycle from recruitment and induction, through performance management, staff management and leadership. Where relevant ensure appropriate criminal checks are undertaken and make sure that at least two references are followed up. Ask directly about previous misconduct.
Measure and collect data to track SEAH	Track internal metrics related to SEAH management, including casework, reporting data, and resolutions. When identifying elements can be removed and privacy/confidentiality concerns are taken into consideration, top-level caseload and outcomes can be published or shared to meet transparency and accountability standards. Include measures to track SEAH prevention (through monitoring), in addition to tracking cases of SEAH. Maintain and communicate data management principles based on national, regional, or international laws and regulations such as GDPR[4]. Engender an understanding that reporting of cases reflects confidence in reporting mechanisms. Analyse and cross reference SEAH data with gender equality data to assess organisational culture and issues that may need to be addressed (OECD, 2022[10]).
Resources and funding	Accountability requires dedicated, sustained human and financial investment, as well as working with partners to address uneven capacity, raise awareness, and initiate prevention and response action. Appropriate funding and staffing levels can strengthen systems and capability to manage policy and programming, and can encourage bystander action. These are significant components in creating an enabling environment for prevention of and response to cases of SEAH. Source: OECD.I

An organisation's institutional framework and the role of its leadership are critical elements to supporting organisational culture change. However, it is also important that every staff member also recognises their own individual responsibility, and that there is an active "speak up" culture. This includes in the role that all individuals play as **active bystanders**. This can be encouraged, for example, through the establishment of **whistle-blower mechanisms.**

Box 1.3. Creating a safe space for whistle-blowers: how to build speak up cultures

Establishing a **whistleblowing policy** is a foundational part of an institutional framework to respond to SEAH. The policy can encourage people who have witnessed or know of misconduct or wrongdoing to report it. Organisations should also go further to understand and act on what encourages or deters staff from speaking up and reporting.

The **CHS Alliance** report *"Creating a safe space for whistle-blowers: how to build speak up cultures"* highlights a number of steps organisations should take, including recommendations for **policymakers** when reviewing or developing a whistleblowing policy. As a starting point, a whistle-blower policy should include:

- the purpose of the policy (objectives, importance) and its scope (who it applies to and who protects);

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[4] General Data Protection Regulation

- basic principles or commitments, definitions, and terms (i.e., staff, reporter); the local legal context;
- a description of reporting channels, how reports with be handled in a fair and consistent way, and protection for reporters, including from any form of retaliation;
- how the policy and reporting system will be reviewed and improved.
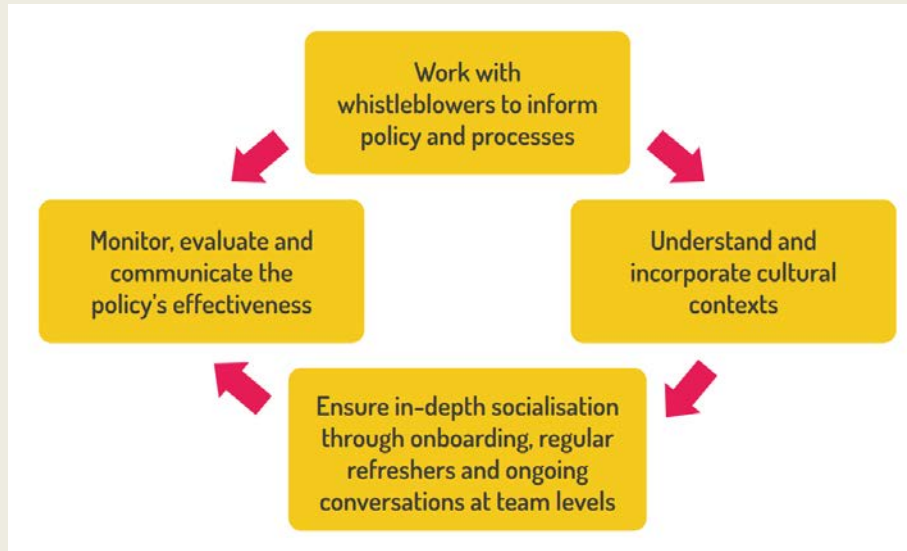
Source: CHS Alliance (2022[11]), Whistleblower protection report – how to create a safe speak up culture Whistleblower protection report – how to create a safe speak up culture.

Senior level engagement and leadership

As per the DAC Recommendation:

> *1.b Ensure sustained senior-level engagement and leadership commitments to shift or sustain positive organisational culture and norms in relation to SEA and SH prevention and response, through regular senior-level discussion on how these issues are addressed, and also ensure dedicated organisational capacity to support and coordination work on SEA and SH, recognising the links to broader human rights and commitments to gender equality.*

Organisational culture change, effective systems to address SEAH, and ensuring that there is dedicated organisational capacity to support work on ending SEAH all rely on strong support from leadership.

Leaders are role models and have an obligation to behave with integrity and to speak up and challenge wrongdoing. **Visible** and **sustained** leadership on addressing SEAH will help encourage confidence in institutions and systems to properly respond to and prevent SEAH. This kind of leadership can be expressed through regular communications, trainings, and awareness-raising activities; which are focused on explaining power and privilege, and emphasising values such as zero tolerance to inaction.

Effective leadership should also put in place organisational **values** that are supportive of broader human rights and gender equality. For instance, inclusion through gender transformative efforts and representation of persons in marginalised situations in positions of power and decision-making structures within the organisation can help to promote a more conducive context for cultural change (Coqual - formerly Center for Talent Innovation, 2013[12]).

Support for tackling SEAH needs to be clearly signalled and measured through action rather than implemented as a box-ticking exercise. Leadership should promote a culture of transparency at every level within the organisation including the publication of data and research, clear signposting of supports and policies, and inclusion of supportive behaviours in performance management criteria for all management and staff. Donors and Governing Boards can support leaders in their partner organisations by showing interest in organisational culture and incentivising (rather than discouraging) reporting.

It is important that leadership is not only visible, but also **sustained**. This helps to institutionalise support for tackling SEAH, rather than relying on any individual support or passion from a specific representative in a leadership position. Several countries and organisations have opted to appoint a high-level SEAH champion, a role that can have a marked impact on driving internal and external change. This person also plays a political role, including through internal and external advocacy. A high-level champion can be in the form of a political appointment (such as a specific ambassador), or a special coordinator or victims' rights advocate, for example. In some cases, a visible SEAH champion can also serve as a focal point for victims/survivors on the ground. Putting in place other required activities relating to SEAH, which helps solidify the requirement of addressing SEAH, such as the use of governing boards meetings or recurring reporting measures, can also be used to support institutionalisation of these efforts at the leadership level Box 1.5.

Box 1.4. Supporting leadership through conflict resolution training to promote a speak-up culture UNFPA and the Office of the Ombudsman for United Nations Funds and Programmes

An organisational culture that promotes trust and accountability, and is supportive of victim/survivors, is often also characterised by having a strong "speak up" culture. UNFPA have described this through one of its policy objectives, to "promote a harmonious working environment and create an atmosphere in which personnel feel free to express concerns about inappropriate behaviours and to use, without fear of reprisal, all recourse mechanisms and services available to them."

In an effort to implement policies around the prohibition of sexual harassment, but also other forms of harassment, abuse of authority, and discrimination, UNFPA has put in place several training and capacity building measures targeted at its leadership. This includes a new Learning programme on "Impactful Conflict Management for Leaders" in partnership with the Office of the Ombudsman for United Nations Funds and Programmes.

This programme aims to better equip leaders and empower managers in **managing conflicts** and **making early interventions to conflicts**, by developing their conflict resolution skills and equipping them with tools to effectively handle workplace issues. The programme comprises:

- Module 1 focuses on conflict management with special attention on the victim-centred approach;
- Module 2 presents key principles and techniques of mediation as an effective tool for resolving disputes; and
- Module 3 is centred around the psychological safety in team as a critical factor for a strong speak-up culture.

The programme is directed at regional, country and liaison offices Representatives, Deputy representatives, Assistant representatives, and HQ Directors, deputy Directors and Chiefs. In its roll out in several regions, it has been made mandatory for all heads of offices across the regions.

Source: UNFPA (2018[13]), Office of the Executive Director - Protection from Sexual Exploitation and Abuse and Sexual Harassment [Prohibition of Harassment, Sexual Harassment, Abuse of Authority](#)

Box 1.5. Encouraging leadership to step up on tackling SEAH: the United Kingdom approach

Active support and vocal leadership is an important element of any government or organisation's ability to respond to and prevent SEAH. Several concrete actions can encourage regular and active engagement from leadership on this issue.

The 2018 London Safeguarding Summit ("Putting people first: tackling sexual exploitation, sexual abuse and sexual harassment in the aid sector") produced commitments, including around incentivising cultural change through leadership, organisational accountability, and better human resource processes. These include concrete suggested actions, for example:

- Have one or more named **senior-level champion(s)** accountable for work on sexual exploitation and abuse and sexual harassment, while stressing that the responsibility for safeguarding rests with all individuals in an organisation.
- Encourage **at least annual discussion** at the Board or equivalent level in all organisations of sexual exploitation and abuse and sexual harassment and how the organisation is addressing them.
- Encourage the **recruitment and career development of women at the senior management** level and throughout organisations to send a clear signal about the importance of gender balance and a diverse and inclusive workforce.

UK experience in the area of due diligence with implementing partners has also led to a particular emphasis on the **importance of the organisation's board** (be they trustees appointed or elected or shareholders). This focus places the board as the ultimate holder of responsibility for safeguard and act in the best interests of the beneficiaries, staff, and volunteers.

The Foreign Commonwealth and Development Office (FCDO) Due Diligence Guidance for implementing partners sets out 6 key areas of safeguarding, including governance and accountability standards that create, foster and help ensure safeguarding through requisite controls and oversight. They identify the responsibility of the custodians of the organisation's values, namely the ones in leadership positions. Taking into account the diversity of organisations, the guidance suggests the following:

- **designate a safeguarding officer at board level** who engages with the organisation's senior leadership teams and management; and
- for larger organisations operating in multiple locations, set up a **network of safeguarding leads** at appropriate levels across the organisation;
- seek the same assurances on safeguarding governance and accountability from potential project partners.

Source: Foreign Commonwealth & Development Office (2022[14]; 2018[15]) Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH) Due Diligence Guidance for FCDO implementing partners and Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

Policies, strategies, and work plans for SEAH prevention and response

As per the DAC recommendation:

> *1.c Develop policies, strategies and work plans for SEA and SH prevention and response that are effectively implemented; set goals and standards; demonstrate a coherent approach; and support implementation of related work streams. In these policies, Adherents should make it clear that failure to respond appropriately to incidents of SEA and SH will not be tolerated, while prevention and response should be based on a survivor and victim-centred approach that aims to do no harm.*

Setting the parameters of a SEAH policy – guidelines and key considerations

Organisations should establish a comprehensive SEAH policy, to ensure that SEAH prevention and response are clearly defined and coherently implemented.

A SEAH policy should:

- Include a clear rationale and explanation for the need for the policy as well as clarify how SEAH relate to issues of power and gender equality as well as organisational goals and values.
- Set out overarching objectives, e.g., to prevent and respond to SEAH in all humanitarian and development assistance, through tackling power imbalances including gender inequality and highlight the responsibilities of donors and other aid actors in maintaining the integrity of aid.
- Set clear goals on organisational culture, with clear organisational leadership and pathways to achieve them.
- Take into consideration mitigation and prevention efforts to end SEAH, not only response.
- Clarify the definitions of sexual exploitation, abuse, and harassment as laid out in DAC Recommendation[5], UN established frameworks[6].
- Reference relevant international standards[7], conventions, and national legislation, as appropriate.
- Reference expected standards of behaviour, a zero tolerance for inaction approach, and clear prohibitions against SEAH (based on institutional guidelines and international standards).
- Avoid language that trivialises the behaviour. For example, refers to it as an annoyance; makes moral judgements; refers to offensiveness; or engages in demeaning psychologising such as refers to humiliation.
- Clearly set out the scope of the policy and who the policy applies to, for example categories of staff, consultants, volunteers, leadership, and partners (NGOs, private sector, multilaterals, etc.).
- Clarify who is protected under the policy, for example, categories of staff, partners, project participants, family members and communities, etc.
- Outline who is responsible for each aspect of addressing SEAH beyond the basic requirement for everyone to report. In order to have accountability, people need to know what their specific responsibilities are as contracting officers, counsel, or activity managers, for example.

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[5] [DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance](#)

[6] [Addressing discrimination, harassment, including sexual harassment, and abuse of authority (ST/SGB/2019/8)](#) and [UN Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse](#)

[7] [IASC Six Core Principles Relating to Sexual Exploitation and Abuse](#) and [Core Humanitarian Standard on Quality and Accountability](#)

- Policies should be published widely, clearly and in a way that is accessible to all. They should use simple language and be available in a variety of languages, child-friendly and disability-appropriate formats and be suitable for those who have already experienced trauma.

A SEAH policy should centre around the following principles:

- A **victim/survivor-centred approach** must be at the front and centre of the policy, and applied to all partnership agreements and objectives. The approach needs to be rights-based and its definition clarified robustly as often the definition is weak.

- Highlight **do-no-harm** and **zero tolerance for inaction**.

- **Accountability** must be clear in principle and practice for all staff and partners. The consequences of breach should be clear, including in terms of support to victims/survivors, investigation, and consequences for perpetrators; and applied to the organisation and all its partners. Information should be provided on outcomes to encourage reports, recognise the experience of victim/survivors, and discourage others from perpetrating.

- Dedication to **awareness raising** to community members about SEAH, their right to not be harmed, their options for reporting and available services for victims/survivors.

- Inclusion and prioritisation of feedback and **consultations with concerned communities**.

- **Transparency** through publishing the policy and related operational mechanisms (e.g., reporting and complaints mechanisms, anonymous numerical case reporting.

- **Capability**, in terms of clarity and specifics around the needs of the organisation and partners to work together bridge gaps in organisational capacity to tackle SEAH, and include a plan on how to address these needs.

The development of a SEAH policy should:

(1) Align with and reinforce other relevant policies:

- This is a central component of ensuring the creation and implementation of a coherent and comprehensive SEAH strategy. SEAH occur in many agencies, and many different sectors and therefore it is important that any new policy is coherent and aligned with existing policies and standards in these areas; new policy should support and reinforce standards in these sectors.

- In the process of developing a new SEAH policy, it may become apparent that some of these sectors and related fields have insufficient or no policies. For example, an overarching SEAH strategy will be successful only if it is supported by strong policies across the spectrum of human resources, risk management, well-being, and health as well as security and safety approaches. In addition, it needs to be aligned with approaches laid out in an institution's sector-specific policies (including but not limited to education, employment, health, etc.).

- It is also important to align SEAH strategies with international standards and commitments in related fields, such as human rights, gender equality, human resources, and staff safety. It is also important organisations prohibit SEAH and hold perpetrators to account and ensure that they are not re-employed in the sector across all levels of hierarchy.

- An integrated approach, i.e., embedding SEAH standards and policies into existing systems (and vice versa) has been beneficial for some members. Building upon existing policies, for instance related to policies on any form of discrimination, child protection, or feminist policies has been successful.

(2) Include early consultations and transparent communications around the steps taken to develop policies:

- Securing cross-governmental or cross-agency buy-in, including across a range of departments and ministries, and addressing their concerns early in the process has proven useful when developing SEAH policies.

- Consult with civil society partners, community members and women's rights organisations and others working on Gender Based Violence (GBV) to understand SEAH risks, and develop guidance and tools. Independent national human rights institutions such as ombudsman's (national human rights commissions and consortia of these) have an important role to play.

- Initiating consultations and involving staff, experts and partner organisations at an early stage is important so that broader knowledge is gained, and the policy is internalised amongst staff and partners. Information should be available in local languages so grassroot organisations and local communities can be consulted. Welcoming their comments and recommendations, as well as disseminating information through a broad, mass distribution of, for instance, a SEAH discussion paper, is beneficial when developing a policy

- Broad dialogues are crucial to ensuring SEAH policies and values are fully understood by staff and partners, and skills building is often required, in particular with regard to awareness and communications.

- External consultations can also be useful. These include reaching out to groups such as academia and think-tanks, to share and test ideas and reflect on the scope and direction of a policy. In some instances, external consultation can also include receiving feedback on draft policies and strategies from similar organisations or institutions.

Box 1.6. Feminist foreign policies and strengthening SEAH prevention and response

While diplomatic efforts with partner countries have often focused on human rights issues in a broader sense, advocacy for gender equality and the empowerment of women and girls has not always been a priority topic in diplomacy. Nevertheless, as a result of increased evidence of the benefits of furthering gender equality for economies and societies overall, diplomats increasingly promote gender equality as a core value. Numerous countries, including DAC Members, have feminist foreign or development policies, aiming to establish a comprehensive and institutionalised approach to feminist diplomacy. (OECD, 2022[10]).

Feminist Foreign Policies contribute to the advancement of gender equality and the empowerment of women and girls globally, which it turn addresses one of the primary underlying causes of GBV. Considerations around SEAH and GBV/VAWG more broadly have been explicitly highlighted or linked to these policies by some countries. This represents an important political statement and signals high-level prioritisation of these issues. The examples below are not exhaustive but rather illustrative of advancements.

France has referred to a "feminist diplomacy" for its foreign policy action since 2018. It promotes this in its International Strategy for Gender Equality (2018-2022). The strategy highlights the need to include a gender equality perspective "in all French diplomatic priorities and all political, economic, soft diplomacy, cultural, educational and development co-operation actions". The strategy also includes violence against women in all its forms as one of the central elements; and across sectors.

Canada's Feminist Foreign Policy is the international expression of ongoing, co-ordinated and whole-of-government efforts to advance human rights, including diversity and inclusion and gender equality domestically. It involves applying a feminist approach across all of its international policies and programming, including diplomacy, trade, security, development and consular services. This builds on a series of sectoral policies and initiatives, notably the Feminist International Assistance Policy. This approach explicitly recognises the importance of reducing sexual and gender-based violence, recognises that women and girls as often the most vulnerable to violence, and also recognises the heightened risk of GBV in conflict-affected contexts.

Spain's Feminist Foreign Policy was adopted in 2021 and promotes a two-pronged approach, strengthening the work of the Foreign Service on gender equality as well as mainstreaming a gender perspective in all phases of foreign policy and actions. This Policy also recognises eradicating gender-based violence as one of Spain's core values and interests. It also explicitly recognises the importance within humanitarian affairs, stressing the mainstreaming gender equality into all interventions, especially regarding the prevention, protection and assistance to the victims of sexual and gender-based violence in humanitarian crisis situations.

The **Netherlands** announced its Feminist Foreign Policy in 2022; and defined this foreign policy approach across four central categories: rights, representation, resources, and reality check. Within the focus on rights, the Netherlands has included the right to be safeguarded from violence. The policy also plays particular importance on sexual violence during conflicts.

Box 1.7. A comprehensive institutional framework to preventing Sexual Exploitation, Abuse and Harassment: lessons from Australia

Australia was one of the first DAC Members to develop a **Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH) policy** (April 2019) and followed with the appointment of a **PSEAH Champion**. The Champion's principal role is as lead advocate for the Department of Foreign Affairs and Trade's efforts to address SEAH internally and internationally.

As understanding and awareness of the criticality of SEAH prevention and response efforts rise, the Champion's role has matured into assisting staff and external stakeholders to better understand the nexus between necessary safeguarding approaches relative to the many different contexts in which Australia works, and the importance of applying SEAH prevention principles in anticipation of the multiple global challenges. For example, climate change, the impact of adverse weather events, and the potential for an increase of SEA for vulnerable communities, requires Australia to think about prevention and response efforts to meet this challenge within the region.

In addition, Australia has based its efforts on SEAH building on longstanding systems and procedures in social safeguarding and child protection. The PSEAH Policy is underpinned by the six principles outlined below. The principles reflect Australia's international commitments to address SEAH and Australian initiatives to reduce violence against women and children:

- Principle 1: Zero tolerance of inaction: For this Policy, DFAT defines zero tolerance as acting on every allegation in a fair and reasonable way with due regard for procedural fairness.

- Principle 2: Strong leadership accelerates culture change: DFAT expects leaders to set clear expectations and model respectful behaviour in their interactions at work.

- Principle 3: Victim/survivor needs are prioritised: Action to address SEAH should be underpinned by a "do no harm" approach prioritising the rights, needs, and wishes of the victim/survivor, while ensuring procedural fairness to all parties.

- Principle 4: Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility

- Principle 5: Gender inequality and other power imbalances addressed: The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring.

- Principle 6: Stronger reporting enhances accountability and transparency: Stronger reporting allows DFAT to better monitor SEAH, understand risks, improve assurance and work with organisations to improve systems and safeguards accordingly.

Australia has also established a mechanism to review and improve on its policy going forward, a dynamic process important to be able to share progress and learning.

In support of its partners in their development of SEAH policies, the New Zealand Ministry of Foreign Affairs and Trade (MFAT) has developed guidelines to help its partners assess the risks factors and other potential considerations. There is no unique framework and each SEAH policy must be adapted to the organisation implementing it. The developed checklists contribute to a better understanding by partners of their organisational framework.

Source: New Zealand MFAT (2022[16]), Preventing sexual exploitation, abuse and harassment, https://www.mfat.govt.nz/assets/Aid-Prog-docs/PSEAH/MFATAIDPSEAH-Guidelines/MFAT-NZ-Aid-Programme-PSEAH-Guidelines.pdf and Australia DFAT (2019[17]), Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, https://www.dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment

Developing an organisational SEAH action plan

An action plan should be developed to assess the organisation's structure, activities, policies, practices, and initiatives.

Developing an action plan helps the implementation of specific objectives to make progress on SEAH prevention across all areas and programmes of the organisation. It also assists with the monitoring progress (see Pillar 6) and holding people in positions of responsibility to account.

Figure 1.1. Develop an organisational SEAH action plan

Source: Chatham House (2021[18]), Gender, think-tanks and international affairs: A toolkit, http://www.chathamhouse.org/2021/02/gender-think-tanks-and-international-affairs-toolkit.

Develop Codes of Conduct or Ethical Standards

As per the DAC Recommendation:

> *1.d Develop Codes of Conduct or Ethical Standards providing explicit standards and regulations to prevent and combat SEA and SH, ensuring they are publicly available and conveyed to staff and senior management consistently throughout key employment cycle moments (including recruitment and disciplinary processes), in preparation for and during missions, in performance management structures and within leadership values. Such codes of conduct and ethical standards should be shared with implementing partners and actively communicated in relevant languages and formats to local communities where relevant.*

A **code of conduct** clarifies expected standards of professional conduct and ethical behaviour for all staff. The code of conduct outlines the key values and principles an institution wishes to cultivate in leadership, management and amongst all staff members, and in doing so it defines both the desired and expected behaviour and prohibited conduct.

Codes of conduct clarify expected standards and prohibited situations, whereas **codes of ethics** identify the principles that guide behaviour and decision making. Most governments and international organisations use both instruments, which combine public service values with guidance on how to apply the expected standards and principles of conduct (OECD, 2020[19]).

The code of conduct plays an important role as it provides mandatory guidelines for all actors on ways to exercise good judgment, comply with expectations related to behaviour, and includes practical examples of how rules should be applied. The code of conduct should be in full alignment with applicable national and local laws and complement human resources policies already in place. Effective code of conduct development is built on rigorous planning. Leadership and commitment to the development of a code of conduct are essential and will inform the focus, tone, and content of the code of conduct.

When designing standards, it is necessary to consider whether the duties are legally and disciplinarily binding or ethical and morally dissuasive with regard to violations. Reliable procedures and resources for reporting and investigating incidents of SEAH, as well as for monitoring compliance with the code are necessary. Clarity of procedures is essential for government officials and aid workers to understand how they should behave, what they should report to whom and when; as well as the sanctions they face if they do not comply with the standards and rules.

Pillar 3 includes further information on related human resources policies and processes.

Key considerations when developing a code of conduct on SEAH.

A Code of Conduct should:

- Include **clear language** describing behaviours that are considered **SEAH,** based on international standards and definitions**.**
- Be **easy to understand** and avoid complicated language, technical jargon, and long sentences. Language should be short, simple, and easily understood by those to whom it applies.
- Provide an outline of its **enforcement policy and mechanisms**; and include accurate information on whom to contact and how for further clarification or to report a violation of the code provisions; and also including a reference to the chain of responsibility and what protection is available to those who report and expose incidents of SEAH.
- Describe **sanctions** that may apply if an employee is in breach of the code and emphasise zero tolerance for inaction. Potential sanctions include but are not limited to: informal or formal warnings; loss of salary; suspension of employment (either administrative leave or without payment of salary); termination of employment; referral to police or other authorities as warranted.
- Particular consideration for cases involving **children**, or other special considerations, should be taken into account.
- **Align** with other institutional policies and be linked to related documents that form part of the institution's wider SEAH prevention system. Assessment and analysis should be made of existing human resources and other relevant policies in order to ensure they are aligned.
- Be **shared publicly**, on the organisation's webpage and in **other places that are visited regularly;** it must also be shared with all staff and with different kinds of external partners, including volunteers, suppliers, and consultants.
- Be **embedded in job descriptions** and institutions should find ways to incentivise teams and individuals to demonstrate they consistently put code of conduct principles into practice.
- **Training** needs to be provided to ensure there is clarity on what should be expected when people are faced with ethical dilemmas and incidents of SEAH, if they for example are a bystander and

observe a violation of the code of conduct. Training can be self-paced or facilitated and involved some role playing of concrete examples and situations.

- Be **reviewed** every 2-3 years to ensure it remains relevant to the needs, challenges, and risks related to the organisation and the environments within which it operates.
- Involve key stakeholders in the **drafting and validation process,** to help build a common understanding of expected standards of conduct and also improves the clarity and ownership of the code of conduct.

Key questions for consideration:

- Does the implementing agency or programme partner have a code of conduct in place that prohibits SEAH? If so, does it include clear definitions of SEAH, actors' responsibilities, reporting protocols, accountability mechanisms and sanctions?
- Do all contracts with service providers include a requirement of a code of conduct that prohibit SEAH? In addition to a general code of conduct, standards can be adapted to specific sensitive sectors and roles within the aid framework. In particular tailored codes of conduct can be developed for at-risk positions.
- Is training on SEAH provisions in codes of conduct provided to all implementing agency staff and partners?

Box 1.8. Inter-Agency Standing Committee (IASC) 6 core principles relating to sexual exploitation and abuse

Many organisations have integrated core standards into their codes of conduct, and in partnership agreements as a requirement for implementing or partner organisation's codes of conduct.

This includes the IASC six core principles relating to SEA. These core principles:

- "Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
- Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
- Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment."

The DAC Recommendation includes an annex of core principles, including the Core Humanitarian Standard.

Source: IASC (2012[20]) Minimum Operating Standards - Protection from Sexual Exploitation and Abuse by own Personnel, Minimum Operating Standards - Protection from Sexual Exploitation and Abuse by own Personnel

Box 1.9. Contribution Agreement for Partners – Canada

Since September 1, 2019, Global Affairs Canada has **required partner organisations to have a code of conduct** to prevent and respond to sexual exploitation and abuse in place before they can apply for development and humanitarian funding.

The Contribution Agreement contains a part on sexual misconduct and requirements for the partner organisation to prevent SEAH:

22.6.1 Recognizing that sexual exploitation and abuse (SEA) violate universally recognised international legal norms and standards and, aligned with Canada's commitment to the delivery of international assistance grounded in a human rights framework, the Organisation declares and

guarantees that it has in place, and **shall maintain in place for the duration of the Agreement, a publicly available code of conduct (the CoC) to prevent, investigate and respond to SEA.**

22.6.2 The CoC shall be integrated across the Organisation's operations and shall, **at a minimum,** include the following provisions, which are based on the Department's guiding principles enunciated at Sexual exploitation and abuse in international assistance webpage:

a) **Accountability processes** integrated throughout the Organisation, including roles and responsibilities to ensure monitoring of, and compliance with, the CoC;

b) A **mechanism for anonymous and confidential reporting** and, fair and confidential investigative procedures to respond to all allegations of SEA;

c) **Training** on prevention of SEA and remedial measures when misconduct is found;

d) Measures including **disciplinary action** in cases of serious misconduct.

Source: Global Affairs Canada (2020[21]; 2021[22]), Contribution Agreement, Contribution Agreement and Sexual exploitation and abuse in international assistance .

Box 1.10. Code of Conduct Best Practices – Denmark

Through a gap analysis of its SEAH procedures, Denmark listed good practices for an efficient Code of Conduct for better protection of individuals and better implementation of procedures:

- **All stakeholders** need to be covered by the CoC (i.e., staff, volunteers, board members, partner organisations, contractors, consultants, etc). In some cases, this is addressed through **specific memorandums of understandings** with the partner organisations, or a specific CoC for non-staff (e.g., contractors).

- CoC's and PSEA policies should be signed by all relevant staff, and the organisation must **ensure that these policies are well understood and implemented throughout all activities and projects.**

- It is important to include an **explicit prohibition against buying commercial sex** although this is already covered in the Secretary General Secretary's Bulletin 2003/13 8 section 3.2 (c). Buying commercial sex contributes to human trafficking, exploitation and abuse, child prostitution and other criminal activities. Therefore, and even if this might lead to some internal conflicts in countries where commercial sex is officially and legally recognised, it is vital to clearly prohibit such activities. **This prohibition is not in contradiction with programmes of some organisations which aim to support the specific category of sex workers or prostitutes.**

- Policies and guidelines, but at the minimum our CoC needs to **be publicly available in as many languages as possible**. It is good practice to include behavioural policies and expectations on the organisation's website.

Source: Denmark, Gap analysis in existing procedures in the Danish NGO sector and civil society tackling SEAH

> **Box 1.11. The importance of legal writing in codes of conduct – Italy**
>
> Italy's Code of Conduct relies on legal references and precise definitions, to avoid any misinterpretation and ambiguity. Sexual harassment is defined, and a non-exhaustive list of examples helps individuals and partner organisations to fully understand the concept:
>
> "Sexual harassment indicates reiterated, undesired, and unacceptable sex-related behaviour and practices, including invitations, questions, requests of sexual favours, verbal or physical behaviour or gestures, which can be reasonably perceived as offensive or humiliating. As a non-exhaustive example, the following actions and ways of behaving are considered sexual harassment:
>
> a) undesired requests - both implicit and explicit - of sexual services;
>
> b) sex-related attentions, deemed inappropriate and offensive by the person who receives them;
>
> c) undesired physical contacts;
>
> d) attitudes, written or oral communications having a derogatory and/or offensive nature connected to a person's gender or way to express sexuality;
>
> e) exposure in the workplace to pornographic material, also in electronic format; extortion of sexual services in exchange for benefits, privileges, and career advancement;
>
> f) threats or retaliation following refusal of sexual attention;
>
> g) sex-related gestures or allusions deemed offensive or inappropriate."
>
> The use of legal terminology is useful in case of a potential conflict between parties, allows for **better accountability** and therefore **better prevention** of SEAH cases.
>
> Source: Italian Agency for Development Cooperation (2020[23]), PSEAH CODE -Protection from Sexual Exploitation, Abuse and Harassment, PSEAH Code of Conduct.

Reporting and response, co-operative agreements

As per the DAC Recommendation:

1e. Develop reporting and response protocols, with clear guidelines for staff on when and to whom to report, and how to respond in a confidential, survivor- and victim-centred and ethically-sensitive manner. Staff should be aware of the obligation to report SEA and SH incidents, with a set time frame for response and follow-up mechanisms, and know that a policy for protection from retaliation is in place, recognising that improved accountability mechanisms may lead to more reporting of SEA and SH incidents.

1f. Include standards, procedures, requirements, and/or binding commitments in all co-operative agreements and funding instruments (for example, contracts, grants, memoranda of understanding) alongside remedies for breaches and reporting requirements.

Reporting and response protocols will be covered in pillars 2 and 3, along with implications for co-operative agreements and funding instruments under pillar 5.

Checklist on Pillar 1

DAC members can helpfully ask the following questions:

On leadership and organisational culture:

- Does leadership communicate clearly on goals, values, behaviours, and expectations related to SEAH prevention and response?
- Are there regular senior-level discussions, and tracking on how these commitments are prioritised and implemented?
- Does guidance exist and are incentives put in place to ensure inclusive, gender-balanced, non-discriminatory environments?
- Are there specific strategies for the recruitment and career development of women in senior leadership and throughout organisations?
- Are there resources dedicated and organisational capacity continuously developed to support and coordinate work on SEAH? Are these efforts linked to other important commitments, such as broader human rights and gender equality?

On policies and codes of conduct:

Codes of Conduct and **Ethical standards** need to provide explicit rules and regulations to prohibit SEA and SH. Codes of conduct should:

- Is SEAH clearly defined, and are all actor's responsibilities explained? Are accountability mechanisms and sanctions clearly explained, in the event that harmful behaviour occurs?
- Are the policies and relevant ethical standards publicly available, on the organisation's/institution's webpage and in other well-visited places?
- Are policies conveyed to staff and senior management consistently throughout the employment cycle, including recruitment, on-boarding, performance management, and disciplinary processes?
- Are policies and practices actively communicated to local communities in relevant languages and formats? Including those appropriate for children, people with disabilities, etc.?
- Does the policy and/or strategy address different types of discrimination and inequalities that intersect with gender equality?
- Do mechanisms to report SEAH incidents exist, as well as clear protocols for how to follow up on a report? Are these shared with implementing partners and include reporting procedures for implementing partners.
- Is SEAH addressed in international partnerships, networks, negotiations, dialogues, and other processes? Do binding commitments such as co-operative agreements and funding instruments (i.e., contracts, grants, memoranda of understanding) etc. include expectations and responsibilities in relation to SEAH?
- Do overall and sector-specific development policies/strategies incorporate any thematic priorities in support of addressing the risk of SEAH? Are the connections between addressing SEAH and gender equality and other development priorities clear and well-established within the institution?
- Does the policy and/or strategy lay the foundations for sustainable and long-term transformative change?

2 Pillar 2 – Develop or support survivor- and victim-centred response and support mechanisms

Defining a Victim/Survivor-centred approach

As per the DAC Recommendation:

> *"Provide for a survivor- and victim-centred approach to SEA and SH prevention and response, where survivors and victims' experiences, rights, needs, and wants are at the centre of reporting, investigative, and response systems, and to ensure donors and implementing partners respond in a timely manner and support and protect survivors and victims throughout the process. This approach should take special consideration of vulnerable groups, including women and children, as well as people most at risk of discrimination on the basis of, for example, disability, gender identity and sexual orientation, race, ethnicity, age or religion. A survivor- and victim-centred approach should be grounded in respect for human rights, as well as respect, confidentiality, safety, and non-discrimination."*

Why a victim/survivor-centred approach?

Organisations have the responsibility to operate safely in development and humanitarian contexts in a way that does not harm, and work in partnership across actors and communities. This includes providing protection from SEAH, working to prevent SEAH, and responding when SEAH occurs. At the heart of these efforts, is the SEAH victim/survivor. There is an obligation to recognise the harm and long-term damage inflicted on individuals and their communities, and the responsibility that entities have to promote the well-being, healing, and recovery of an individual and/or community affected, as well as to pursue measures to hold the perpetrator accountable.

The rights and dignity of the victim/survivor must be placed at the centre of all SEAH prevention and response efforts. A victim/survivor-centred approach ensures that victim/survivor needs are heard and taken into consideration, treated with respect, and get the assistance and support they need. The principles of "do no harm" and "zero tolerance for inaction" are central in ending SEAH internationally. These principles should be applied both in approaches to the ways organisations address SEAH, including prevention, and in their approach to supporting victims/survivors. For the principles of 'do no harm', it is important to understand the norms and values of the community/society and the implications this may have for victims to come forward. Intersectionality - specifically the special considerations for the lived experiences of victims/survivors with intersecting identities that could put them in vulnerable positions - should be included at all work to end SEAH and in efforts across the pillars of the DAC Recommendation.

Defining a SEAH victim/survivor

Depending on the organisation, the terms "victim" and/or "survivor" are used in different ways. The reasons for the different use can vary. It is the individual who should decide when the shift from 'victim' to 'survivor' occurs. Human rights treaties and other documents developed within the United Nations and other bodies generally use the term 'victim.' This term does not preclude the recognition that those coming forward have had to garner greater strength and courage[8]. The term "victim" can also be interpreted as recognising the gravity of the harm that has been committed; it is often argued that the term victim also avoids undercutting the serious nature of the abuse. For example, in cases where a child has been the victim of abuse, the term "victim" may be chosen as it relates to the child's agency (dependent on their age or other circumstances) and the extent of the crime committed. In addition, not all victims of sexual assault survive the attack and can therefore not be called survivors.

Throughout the process, the victim/survivor should retain a sense of control and agency, as those who have experienced violence also report feelings of loss of control. The way that the person is identified, or referred to, is one such way to maintain a sense of control, as it is their personal choice. Depending on who has experienced violence, that person does not always identify themselves in the same way (as a "victim" or "survivor" or something else).

For the purposes of this toolkit, the term "victim/survivor" will be used.

Many victims/survivors do not report, and many may remain unknown. A low level of reporting is often a sign that the systems in place are not working[9], or fear of retaliation or reprisals. If sexual exploitation, abuse, and harassment is not reported, this does not mean that there are no victims/survivors. Rather, it may be an indicator that SEAH risks may not be proactively assessed or handled. It is essential to remember that institutions are no less accountable to those victims/survivors who are invisible, as to those who are able or willing to report.

In placing the rights and needs of victims/survivors at the centre, the organisation recognises that each person:

- is different and unique;
- may react differently to sexual exploitation abuse and harassment;
- decides who should know about what has happened to them;
- has equal rights to care, support, and protection;
- has fundamental rights; and those appropriate to their age and the circumstances; and
- has different strengths, capacities, resources, and needs.[10]

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[8] UN Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse and Technical Note of the Implementation of the United Nations Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse.

[9] "Systems" refers to those mechanisms set up to specifically prevent and response to SEAH (i.e. complaints mechanisms), but also a compromised legal systems or functioning rule of law specific to the context/environment. This also includes that systems may in fact exist, but proper confidentiality or privacy measures are not respected. This will be developed further in this chapter, and in pillar 3.

[10] This list was adapted and expanded based on different organisations' experiences (UNICEF and others):

What is a victim/survivor-centred approach?

Defining a victim/survivor-centred approach

The DAC Recommendation refers to a "survivor and victim-centred approach" that should "be grounded in **respect for human rights**, as well as **respect, confidentiality, safety, and non-discrimination**"[11] …where survivors and victims' **experiences, rights, needs, and wants** are at the centre...".

Other definitions also take into account similar underlying principles, whether limited to SEA or SH, or SEAH as a whole. For example:

> *The UN Chief Executive Board Task Force defines a victim-centred approach to sexual harassment as "engaging with a victim/survivor in a way that respects their **rights, needs, wishes and dignity,** protects them from **retaliation, re-traumatization and discrimination**, keeps them **informed, and supported**. It underscores the fact that this approach is essential to ensuring respect for the victim's/survivor's **dignity**, **empowering victims/survivors**, and creating a working environment free from sexual harassment. It also recognises that the way the rights, needs, wishes and dignity of victims/survivors are approached is critical to their **safety and well-being**…" (UN System Chief Executives Board for Coordination (CEB), 2021[24])*

> *UNHCR defines a victim-centred approach: "In the context of sexual exploitation and abuse and sexual harassment, a victim-centred approach is a way of engaging with victim(s) that **prioritizes listening to the victim(s), avoids re-traumatization,** and systematically focuses on their **safety, rights, well-being, expressed needs and choices,** thereby giving back as much **control to victim(s)** as feasible and ensuring the **empathetic and sensitive delivery of services** and **accompaniment in a non-judgmental manner**." (UNHCR, 2020[25])*

While many development agencies and institutions distinguish between the rights and needs of a SEA victim/survivor and a SH victim/survivor, as well as the response and preventative measures, there are central core principles that apply to all SEAH victims/survivors. The principles outlined below also align closely with the IASC *Definition & Principles of a Victim/Survivor Centered Approach* (Inter-Agency Standing Committee, 2023[26]).

Table 2.1. Some guiding principles: victim/survivor-centred approach to consider

Principle	Explanation
Do no harm	The responsibility not to jeopardise the life, safety, freedom, dignity, and well-being of persons who come in contact with the organisation, in particular victims/survivors. Entities must exercise good judgement, be aware of the potential risks, prioritise victim's safety and well-being and avoid causing further harm to victims/survivors when addressing sexual exploitation abuse and harassment.
Putting victims/survivors first	The rights and best interests of victims/survivors are central in shaping responses to allegations regardless of who the alleged perpetrators are. This means that victims/survivors must be informed of the options available to them, and that their safety and well-being take precedence.
Respect for human rights	The rights of victim/survivors must be respected at all steps in the process.
Non-discrimination	All individuals are equal as human beings and by virtue of their inherent dignity. All human beings are entitled to their human rights without discrimination of any kind.
Respect for confidentiality	Confidentiality is a key means to protect victims/survivors. It covers the identity of those who provided the information, as well as the information itself. Issues of privacy, including measures in place to protect anonymity and personal data, should be included.
Respect for informed consent	Informed consent is based upon the victim/survivor's clear appreciation and understanding of the facts,

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[11] These four guiding principles are based on the UN Comprehensive Strategy on Assistance and Support to Victims of Sexual Exploitation and Abuse by UN Staff and Related Personnel (A/RES/62/214)

Principle	Explanation
	implications, and future consequences of an action. In order to give informed consent, SEAH victims/survivors must have all relevant facts available at the time their consent is sought to be able to evaluate and understand the consequences of a course of action. They must also be aware of and have the power to exercise the right to refuse to engage in an action.
Participation	Consult with victims/survivors and create the opportunity and channels for them to actively participate in decisions and processes that affect them and impact on their life.
Transparency	Ensure that victims/survivors are informed on the progress and outcomes of processes that concern them, and that information on new allegations and related responses is made publicly available, as appropriate.
Accountability	The responsible entity must ensure accountability, for example through the application of disciplinary measures while respecting due process requirements. The organisation also responsibility to ensure appropriate measures to protect victims/survivors' protection, safety, and well-being.
Equal application	Taking action to prevent and respond to sexual exploitation, abuse, and harassment regardless of the nature and/or status of the alleged perpetrator's affiliation with any respective entity.
The best interests of the child	Particularly in relation to securing the child's physical and emotional safety in the immediate, short, and long terms. The concept of the child's best interests is aimed at ensuring both the full and effective enjoyment of all the rights recognised in the Convention on the Rights of the Child.

Source: Adapted from multiple sources, including Policy on Integrating a HRBA to United Nations efforts to Prevent and Respond to SEA (United Nations, 2021[27]), and A Human Rights Framework For Preventing Sexual Exploitation, Abuse and Harassment (InterAction, 2022[28]).

Rights of the victim/survivor

There are fundamental rights applicable to all SEAH victims/survivors, based on human rights principles and considerations. The UN Victims' Rights Statement also provides explicit references and guidelines for SEAH victim/survivors (2023).

These include:

- Comprehensive support services for victims/survivors of sexual exploitation and abuse, including legal aid, medical care, psychosocial support including counselling by trained professionals, shelter, and rehabilitation services;
- Protection of victims/survivors during investigations and judicial proceedings, including by making available gender-responsive protection mechanisms and ensuring protection from stigmatisation; and
- Access to information on processes concerning them;
- Provision of remedies to victims/survivors, including equal and effective access to justice;
- Adequate, effective, and prompt reparation for harm suffered and rights violated;
- Remedies should be extended to children born as a result of sexual exploitation and abuse with paternity and child support claims addressed in a prompt and comprehensive manner.

Given the complex environments within which SEAH can occur, it is important to acknowledge that these rights are not systematically realised.

> ## Box 2.1. A human rights-based approach for SEAH victims/survivors
>
> The DAC Recommendation recognises that SEA and SH can constitute a violation or abuse of human rights in some circumstances, and thus the promotion, protection, and respect of human rights must be at the core of preventing and combatting SEA and SH. A "human rights-based approach" to preventing and responding to SEAH integrates human rights considerations, in accordance with international human rights principles, norms, and standards that may have been violated. In this way, placing SEAH within a human rights-based approach can also be seen as offering a complementary legal and policy framework for prevention and response.
>
> This approach seeks to analyse and respond to abuse through understanding the context (power, discrimination, social exclusion, and inequality). It also recognises the power imbalances present between a bilateral donor, international organisation, government, or civil society organisation– and the communities with whom they work. SEAH occurs when these power imbalances are exploited or abused, and the fundamental rights of the community and the staff within these organisations are violated. These abuses of power stem from systemic factors of inequality, and a human rights-based approach allows organisations to develop SEAH prevention measures that take into account factors of people's identities that can exacerbate SEAH risks and have a compounded impact when SEAH does occur; it also helps to ensure SEAH approaches analyse and address the root causes of discrimination and inequality.
>
> Source: United Nations (2021[27])Policy on Integrating a HRBA to United Nations efforts to Prevent and Respond to SEA, https://www.un.org/preventing-sexual-exploitation-and-abuse/sites/www.un.org.preventing-sexual-exploitation-and-abuse/files/policy_on_integrating_a_human_rights-based_approach_to_un_efforts_to_prevent_and_respond_to_sea.pdf, and InterAction (2022[28])A Human Rights Framework For Preventing Sexual Exploitation, Abuse and Harassment, https://www.interaction.org/resource-library/a-human-rights-framework-for-preventing-sexual-exploitation-abuse-and-harassment/ .

When considering a victim/survivor-centred approach, there is a tendency to focus on those actions associated with **response**. While this is essential, especially considering the response necessary to support individual victim/survivors, it is also important that SEAH **prevention** efforts take a victim/survivor-centred approach. However, more emphasis is needed on prevention.

What are some initial considerations for victim/survivor-centred prevention efforts?

- Prevention should aim to prevent incidents of SEAH; there is a need to learn from and engage victim/survivors (when they are willing and as appropriate) in order to inform preventative actions
- Perpetrators or potential perpetrators are one of the main target of preventative efforts; it is important that the responsibility of prevention is not transferred to the individual victim/survivors.
- Prevention should be tailored to stakeholders, the intervention aims to reach communities and different categories of staff, and be adapted to culture and location.
- Prevention activities should principally be aimed at preventing perpetration, and focus on mitigating risks, understanding and documenting patterns of perpetration
- Prevention should also include an awareness-raising and training component focused on (1) building skills and empowering staff and concerned communities in terms of exercising their PSEAH rights; and (2) expected behaviour of staff, and training bystanders on recognising and reporting bad and abuse behaviour.
- Prevention also includes organisational accountability – dealing with offenders through perpetration registries, and using human resources screening tools, and referral of criminal accountability.

Applying a victim/survivor-centred approach

A victim/survivor centred approach should be integrated into all parts of an institution's framework to address SEAH. This includes:

(1)   SEAH policies and codes of conduct that specifically prohibit SEAH, communicated robustly to communities receiving aid and informed through consultation with them;

(2)   Statements and messaging by leadership;

(3)   Reporting, feedback, and complaints measures;

(4)   Investigative and response systems;

(5)   Referral mechanisms and service pathways;

(6)   Capacity building, training, and awareness raising, human resources considerations;

(7)   Risk management.

(8)   Coordination ensuring implementing partners and responsible entities respond in a timely manner to support and protect victims/survivors.

These efforts should be accompanied by explicit consideration of groups in vulnerable situations and people most at risk of discrimination, including on the basis of, sex, disability, gender identity, sexual orientation, race, ethnicity, age, or religion.

Policies

A victim/survivor-centred approach should be a central pillar of the overarching SEAH policy and strategy of an institution. In some instances, entities may put in place a separate victim/survivor-centred policy.

Box 2.2. Examples of learning around integrating survivor and victim-centred approaches in policy or creating standalone policies

UNHCR put in place a (separate) specific victim-centred approach policy in 2020. Its efforts focus on increasing the operationalisation of this policy (so it goes beyond simply existing as an overarching policy/strategy). This includes working with all parts of the organisation in a resolution process (Ombuds office, legal, HR, etc.), so that when an individual comes forward with a complaint, there is a clear standard operating procedure that correlates with the policy. The organisation has also put in place measures to ensure that staff in a variety of roles are prepared and understand relevant processes and from the point of view of the victim/survivor.

USAID has focused on embedding a survivor-centred approach into broader SEA efforts and SEA policy by drawing on established resources and learning in the area of gender-based violence. USAID's approach builds on the comprehensive, widely used, and accepted resources addressing survivor-centred approaches built from the notable progress within the GBV Community of Practice and the GBV Area of Responsibility. USAID has stressed the importance of utilising and building on these evidence-based resources within the PSEA space as well. The Inter-Agency Standing Committee (IASC) GBV resources are the main point of reference - consisting of the Guidelines for Integrating GBV Interventions in Humanitarian Settings, GBV Case Management Guidelines, and GBV Minimum Standards. These bring together the wealth of knowledge and expertise garnered by the GBV

Community of Practice, and can serve as important resources for donors seeking to integrate the survivor-centred principles and standards into their own policies and practices.

Capacity-building

Those responsible for implementing a victim/survivor-centred approach are not only those directly involved in specialised agencies or functions, such as professionals working in child protection, GBV service providers, or those specialising in SEAH expertise in government capitals. Victims/survivors usually report to those who they trust, and that person may not be a trained practitioner working in the field of protection from SEAH. Therefore, organisations are responsible for ensuring that all staff and non-staff personnel are informed of the meaning behind this concept and understand their responsibilities.

An institutional framework that is victim/survivor centred should be accompanied by technical support, training, and capacity building. It is important that everyone working within an organisation and its partners understand the principle of "victim/survivor-centred" and what it implies for their role and responsibilities. This is necessary whether or not SEAH response or investigation is explicitly included in their responsibilities.

Box 2.3. Examples of technical support and/or trainings designed to reinforce a victim/survivor-centred approach

InterAction has developed a PSEA training toolkit, which is designed to reach a range of humanitarian actors. This training consists of three modules: PSEA standards and response; Prevention of SEA; and Managing an SEA Investigation. The updated version of InterAction's PSEA training embeds guidance on survivor-centred principles across these modules, particularly when responding to SEA reports and conducting follow-up actions. InterAction was supported by USAID in this project.

CHS Alliance has developed the Investigation Qualification Training Scheme (IQTS), which is a three-tiered training scheme that builds professional skills in Sexual Exploitation Abuse and Harassment (SEAH) investigations and establishes a professional standard and career progression for investigators. The curriculum for this training is based on CHS Alliance's updated Sexual Exploitation Abuse and Harassment (SEAH) investigation guide, and integrates survivor-centred approaches throughout the various modules of the curriculum. The development of this program was supported by technical advice on the curriculum from a group of bilateral donors and other actors. This support also helped to ensure the inclusion of the survivor-centred content. The development of this scheme also benefited from learning in the gender-based violence community.

With support from USAID, **UNFPA** has also developed SEA survivor-specific guidance to be integrated into the IASC GBV Case Management Guidelines and training program. This content has been piloted with field-based GBV Case Management focal points, with the objective to increase their capacity to ensure survivor-centred support to survivors of SEA, as part of broader GBV case management efforts. The survivor-centred approach is integrated throughout the training sessions.

The **Office of the Victims' Rights Advocate** and the **Chief Executives Board Task Force on Addressing Sexual Harassment** has collaborated with the International Organisation for Migration and the Office of the UN High Commissioner for Human Rights, and developed systems-wide training for all UN staff and related personnel. This training emphasises that preventing and responding to sexual harassment is a collective responsibility. It focuses on fostering an understanding of the rights of victims of SEAH, and what an applied victim-centred approach means.

Sources: (InterAction, 2019[29]; CHS Alliance, 2023[30]; CHS Alliance, 2022[31]; Office of the Victims' Rights Advocate, 2021[32])

Complaints mechanisms

As per the DAC Recommendation:

> *"Include a variety of effective, clear, and simple survivor- and victim-centred complaints mechanisms that are available to all community members, with clear requirements and guidance on when and how the mechanisms might be used, and ensure appropriate linkages to and support for the provision of survivors' and victims' assistance. Complaints mechanisms, including community-based mechanisms, should be developed and implemented, adapted to specific local and cultural contexts, and used in co-operation with local leadership, and with authorities where safe and appropriate, and to the maximum extent practicable, be jointly supported."*

A victim/survivor-centred complaints mechanism should take account of the context and environment within which SEAH occurred, and the environment in which the complaints procedure and subsequent actions will take place, while considering the role of the victim/survivor before, during, and after the process. The complaints mechanism should address a number of criteria, including considering the role of the victim/survivor, and their need for support (in the form of services, protection, etc.) before, during, and after the process.

The obligation to report/record SEA and SH to an appropriate entity should be well established (within organisations and in contexts in which they have operations). The onus to report should not be carried solely by the victim/survivor; the international system needs to do more to support action. The obligation of the bystander to report should also be well established. Many victims/survivors do not report cases of SEAH or report a significant amount of time after the occurrence of SEAH. There are a multitude of reasons for this. A complaints mechanism that is developed hand in hand with victims/survivors can help overcome some of these barriers to reporting, be they informational, environmental, social norms.

Complaints mechanisms and subsequent procedures should also be accompanied by **case management** and victim/survivor tracking mechanisms and guidelines on how to process and handle complaints and finalise the reporting system, as well as follow-up on referrals in order to determine the quality and appropriateness of service providers. These can be informed by long-standing practices in the fields of gender-based violence[12].

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[12] This includes, for example, the Interagency Gender-Based Violence Case Management Guidelines.

Figure 2.1. Example of SEA case management process

CASE MANAGEMENT STEPS FOR ADULTS AND CHILDREN, WITH SPECIAL CONSIDERATIONS FOR SEA VICTIMS

1. Introduction and engagement: Greet and develop rapport; assess immediate safety; introduce services and obtain permission (informed consent). For SEA incidents explain **limits to confidentiality** before gathering information. For child victims, ask them to identify a **trusted adult** who can participate throughout the case management.

2. Assessment of victim's situation and needs: First assess if the victim needs immediate medical attention then assess their and their family's immediate safety risks (such as threats, retaliation, harassment).

6. Close case: Once the goals identified with the victim at the start of the process have been achieved, the victim is satisfied with the services received and does not wish to receive further services.

3. Case action planning: Develop a plan for the support and services the victim needs. Decide who will do what by when. First consider their safety/security needs (such as relocation, placing in a safe house), and then their immediate needs (this can include clinical care for sexual assault victims, clothing, food, water).

5. Case follow up: If the goals have been achieved and the victim does not require more assistance, move to next step. If not, reassess victim's needs and identify barriers to achieving care and treatment goals. Make new case plan and implement.

4. Implement the **case plan** including direct support and referral services with the informed consent of the victim

SEA considerations: If victim gave consent to participate in an investigation in coordination and consultation with the investigator, offer to be present at all interviews with investigators to provide emotional support to the victim during the interviews. Also offer to be the liaison person to provide updates on the investigation process and outcome. Give the victim the option to choose if they want the additional support. In cases of child victims who give assent to participate, be present at all interviews with investigators.

Source: United Nations (2021[33]), Technical Note of the Implementation of the United Nations Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse, https://psea.interagencystandingcommittee.org/sites/default/files/2021-11/Technical%20Note_UN%20Victims%20Assistance%20Protocol%20%28ENG%29%202021_final.pdf.

Role of the victim/survivor in the complaints process

Victims/survivors need to be reassured that their needs and perspectives are considered/heard, they maintain control of any subsequent processes following the allegation, and receive regular information on their case. It is important that the complaints process itself does not recreate the lack of control victims/survivors can feel in experiencing SEAH. Throughout the process of bringing forward an allegation, organisations need to be equipped to listen.

Table 2.2. GBV Good practice list: How to engage with a SEAH victim/survivor

Learning developed around GBV Case Management provides guidance around how to engage SEAH victims/survivors

Process Step	Tasks – "do's"	Avoid – "don't"
Introduction and Engagement	• Greet and comfort the survivor. • Build trust and rapport. • Assess immediate safety. • Explain confidentiality and its limits. • Obtain permission (informed consent) to engage the person in services.	• Do not make assumptions about the person and their experience • Avoid unnecessary questions; only ask questions that will give you information to help the victim/survivor. • When different actors or service providers are involved, avoid having the victim/survivor repeat their story, which may be painful or frustrating. • Do not put pressure on the person
Assessment	• Understand the victim/survivor's situation, problems and identify immediate needs. • Provide immediate emotional support. • Give information. • Determine whether the survivor wants further case management services.	

Source: IMC, IRC, UNHCR, UNFPA, UNICEF & USAID (2017[34]) Interagency Gender-Based Violence Case Management Guidelines and Inter-Agency Gender-based Violence Case Management Capacity Building Initiative Strategy and Toolkit

The victim/survivor's involvement in the complaints process can vary, for instance, if they feel capable and willing, they may agree to provide evidence as part of an investigation process. However, they may decide not to participate or withdraw their participation. In other instances, misconduct is reported by a bystander, but no other witnesses or victims/survivors formally come forward.

A victim/survivor's safety and basic needs should be met immediately upon reporting (before any steps including an investigation). A victim/survivor's level of participation in the reporting and subsequent processes does not determine if they receive support or not. If the victim/survivor does not want to be involved in an investigation, for example, support services and assistance should still be offered to the victim/survivor. Irrespective of whether an allegation is substantiated or unsubstantiated, or even investigated at all, services and support to victims/survivors are essential.

In addition, even in the absence of access to victims/survivors, organisations can carry out a range of activities in relation to the perpetrator, and in terms of mitigation. This can include an assessment of the environmental context where the abuse was perpetuated, to identify specific factors that contribute to SEAH; and ways to mitigate those risks in the future.

Elements of a victim/survivor-centred complaints mechanism

Table 2.3. Applying a victim/survivor-centred approach to a complaint mechanism

Availability of complaints mechanisms	Effective, clear, and accessible victim/survivor-centred complaints mechanisms should be made available to everyone including staff, implementing partners, aid beneficiaries and the general public and community. Complaint mechanisms should be developed in co-operation with local actors and adapted to local and cultural contexts. Multiple mechanisms should be made available, including direct to donors.
Clarity of procedure	Procedures should be easy to understand, and readily available – victims/survivors should not have to spend time trying to understand who to report to and how a system works. A lack of clarity around any procedure is discourages reporting.

Advocacy mechanisms	Victims/survivors report to those who they trust, and/or who they believe can lead them to assistance. Where there is somebody in place to act as an advocate for the victim/survivor, it has been found that reporting levels are higher (UN OVRA, 2021[35]). The role and responsibilities of the advocate can include making sure that victims/survivors are able to access the reporting/complaints process, that they are not being ignored or "falling through the cracks" and that they are accompanied and provided advice throughout.
Communication with victims/survivors throughout the complaints procedure	Victims/survivors should be regularly informed and updated on the evolution of their case. Communication with the victim/survivor should be based in respect and empathy and follow privacy and confidentiality concerns.
Comprehensive services/assistance provided to victim/survivor	Assistance for the victim/survivor should include systemic services, across physical and mental health, legal, financial, physical safety/security, etc. In instances where this assistance is provided through other services – such as GBV and child protection – it is important that these are properly funded (in terms of both human and financial resources). Otherwise, there is a risk that the referral pathway is established, but is not functioning properly.
Confidentiality of procedure	Victims/survivors should be reassured of the confidentiality of procedure and have the option to report anonymously should they wish to do so.
Guidelines around **involvement and role of the victim/survivor**	There should be guidance in place around the role of victim/survivor in a complaints mechanism (and then investigation and subsequent accountability process). Tracing the "journey" of the victim/survivor through the process can help to better understand the point of view of the victim/survivor, and improve transitions from one step to the next. Guidelines should take into account different possible scenarios and a range of levels of participation by the victim/survivor. Regardless of their level of participation in alleging a complaint and the subsequent allegation, the victim/survivor should be provided with services/assistance.
Accountability mechanisms	A complaints mechanism should be accompanied by accountability measures. It is important that perpetrators of SEAH are punished, and that there are clear consequences for this misconduct. Organisations must strive to move quickly and decisively – to act to ensure that perpetrators are held accountable and to prevent additional harm. Often mechanisms for accountability often lack survivor-centred principles. While organisations consider legal definitions and compliance structures, survivors are left disconnected from the system. Victims/survivors need to have confidence in the system: if they do not believe that accountability is taken seriously or systematically enforced, they will not come forward. Accountability measures should be clearly defined and communicated, and they must be put in place in a systematic manner. Victims/survivors should be aware of the consequences for perpetrators, and be able to trust accountability mechanisms.
Resources and funding	Resources and assistance provided to the victim/survivor need to be sustainably funded, as well as to the accompanying person who plays the role of advocate. The role of different actors, as well as the need for additional funding and resources needs to also be taken into account by all development and humanitarian actors – including bilateral and multilateral donors, and other actors working directly in the field.
Monitoring and evaluation of process	Complaints mechanisms should be regularly assessed and updated, in order to measure their impact and efficacy. Maintaining a victim/survivor-centred approach should also be included when reviewing. Victim/survivor feedback can also inform monitoring and evaluation. In some cases, indicators can be used. For example, this could be around the roll-out of reporting pathways including GBV considerations, or tracking how PSEA coordinators are reporting on victim/survivor assistance.

> ### Box 2.4. The role of a victim/survivor advocate
>
> Several organisations have put in place a dedicated victim/survivor **advocate. The UN established the UN Victims' Rights Advocate** role in 2018. In some instances, similar roles have been created in the form of "victim/survivor **support specialist**" (put in place at UNOPS). These roles can supplement or are also complementary to the appointment of a victim/survivor champion or overall SEAH champion, established by a number of governments.
>
> Victim/survivor advocates can have a regional or country-wide presence. For example, **Senior Victims' Rights Officers** perform the function of the **UN Victims' Rights Advocate** in the field – currently in the Central African Republic, the Democratic Republic of the Congo, Haiti, and South Sudan. These Officers are the main contact for all victims on the ground and they take steps to ensure that a victim-centred, gender- and child-sensitive and non-discriminatory approach is integrated into the United Nations support of victims. In some contexts, **focal points for victims' rights** have been established. These focal points, appointed by the most senior UN official at country level, have a system-wide role to advise on and strengthen a coordinated and victim-centered approach to the provision of assistance and support to complainants and victims of sexual exploitation and abuse in consultation with the Victims' Rights Advocate.
>
> Another example is UNHCR's **Victim Care Officer** who supports victims of sexual harassment. The Victim Care Officer, a Clinical Psychologist, provides psychosocial support, confidential guidance on processes and services, supports decision making, accompanies victims through the process, coordinates action on their behalf, and assesses risks and individual needs. This service also provides guidance to witnesses and advice to managers on support and risk mitigation for sexual harassment.\
>
> More and more entities are creating these roles, with others including UNOPS creating the role of **Victim Support Specialist.** The advocate role is particularly important, as it builds on the domestic advocates that exist in many DAC members (Australia, Canada, UK, US, most EU countries) for victims of crime.
>
> A dedicated advocate helps to build trust, and encourages people to come forward. The advocate can also provide one central point of reference where people can go for support, and reinforces internally processes, as people within an organisation (and those working with the organisation) are better aware of the process and the potential support available. This also helps to guarantee that appropriate kind of assistance is being provided, and the onus is not put on the victim/survivor to request certain kinds of support (of which they might not be aware or not know what to ask for). With one central point person or advocate, the victim/survivor can also more easily feedback to this same person about what is working or needs to be improved.
>
> Source: UNHCR (2020[25]) Policy on a Victim-Centred Approach in UNHCR's response to Sexual Misconduct, and UN OVRA (2022[36]) Senior Victims' Rights Officers.

Feedback as a central element of victim/survivor-centred approach

There are different forms of feedback that improve institutional mechanisms and reinforce a victim/survivor-centred approach. Organisations have a responsibility to **(1) provide feedback to victims/survivors on the evolution of their case and relevant actions**. Organisations, often through investigators or human resource professionals, should provide information to the victim/survivor on the process surrounding their case and how it is evolving, and be available to provide information should questions arise. Organisations

should also establish ways of working and systems to **encourage feedback (2) from the community; and (3) from victims/survivors themselves.**

Donors, implementing partners, and other kinds of institutions, should work in partnership with both communities and victims/survivors. Victims/survivors may not want to give feedback and their wishes and decisions should be respected. However, in the event that victims/survivors wish to engage, feedback from victims/survivors can help to effectively meeting their needs, and implementing learning through communication and feedback. This type of partnership approach will also contribute to strengthening prevention of further abuse.

Providing an opportunity to victims/survivors to offer feedback during and after the completion of a case creates an opportunity for those directly affected to provide their reflections on processes, which helps to ensure that systems are working effectively and responding properly to victims/survivors' needs. A feedback mechanism allows victims/survivors to contribute to the prevention of further abuse being perpetrated.

Box 2.5. Methodology developed on victims/survivors' feedback

The methodologies to gather feedback from victims developed by the Office of the Victims' Rights Advocate are grounded in the core principles of dignity, respect, non-discrimination, safety, confidentiality, informed consent, support, and prevention that align with realization of the rights of victims and SGBV best practice. Information provided by victims will not be tested, challenged, nor contradicted; and they will be believed and heard. The methodologies also recognise that addressing power imbalance is central to ethical and transformative working, and they will be implemented in a way that does not raise victims' expectations. None of these methodologies is intended to be part of a process of evidence-gathering, or a legal process, and they are informed, *inter alia*, by the World Health Organisation's Guidelines on Researching Violence Against Women, and the Global Women's Institute's '*Gender Based Violence Research, Monitoring and Evaluation with Refugee and Conflict-Affected Populations*' (2018).

The UN CEB Task Force's workstream on strengthening a victim-centred approach to sexual harassment has developed a survey for entities to seek feedback from victims/survivors who have used their informal or formal institutional processes to address complaints of sexual harassment. The feedback will be used to assist the organisations of the United Nations system to address sexual harassment claims better and strengthen support to victims/survivors. The questions in the survey are aligned with the core principles on Advancing a Common Understanding of a Victim-centred Approach to Sexual Harassment, namely respect, non-discrimination, safety, confidentiality, informed consent, support and prevention.

Source: UN OVRA. (2023[37]), Office of the Victims' Rights Advocate | Preventing Sexual Exploitation and Abuse (un.org)

Community feedback loops are important parts of development and humanitarian programming and projects. In actions around protection from SEAH, communities can provide information on how processes and projects should be developed, and on how these are or are not working.

There are various ways to gather feedback from victims/survivors. For example, UNHCR has used a victim/survivor "reference group" – whereby organisations have created an internal or external group of victims/survivors that are willing to be called upon to provide feedback on any new initiative. The use of existing networks to reach victims/survivors for feedback through focal points in the field has also been used. This includes working with SEAH or GBV focal points across different countries.

Box 2.6. Participatory action research (PAR) with communities and PSEAH stakeholders – CHS Alliance, International Institute of Social Studies (ISS), Erasmus University and the Netherlands Ministry of Foreign Affairs

The CHS Alliance, International Institute of Social Studies (ISS), Erasmus University, supported by the Netherlands Ministry of Foreign Affairs, have launched a project called *Closing the accountability gap: better protecting victims/ survivors of sexual exploitation, abuse and harassment.* The overarching goal is to improve the response to SEAH in a holistic and integrate way that puts the needs of the victims/survivors at the centre.

The project was born out of recognition that current efforts to address SEAH are inadequate, and that SEAH cannot be tackled solely from within and by the aid sector itself. Instead, the project aims to promote a bottom-up victim/survivor-centred approach to prevent, address, and redress SEAH (PSEAH) to local contexts and led by communities.

Phase I of the project aims to identify areas for improvement on PSEAH and accountability to affected populations (AAP) systems through country reviews. Further phases of the project will include piloting solutions led and designed by communities themselves; and then bringing learnings from the country pilots to the broader aid sector.

In Phase I, three countries representing different contexts of humanitarian response were examined through desk review, data from the CHS Alliance PSEAH Index, and participatory action research.

For example, findings from Bangladesh where gender-based violence (GBV) among refugees in Cox's Bazar is common, show that 48% of respondents report attempts by aid workers to have sexual relations with community members. Despite this, there is a low level of knowledge among aid staff of their responsibilities in terms of PSEAH, particularly those from the host community with refugee facing roles. In addition, aid organisations' formal reporting mechanisms are seen as weak and 'tokenistic', allowing impunity among perpetrators. There are also many barriers to reporting SEAH, including concerns around confidentiality, stigmatisation, and retaliation. Affected populations therefore prefer to use informal channels for SEAH reporting and redress.

Once this initial phase was completed, a review meeting of key PSEAH stakeholders was held to analyse and discuss the findings. Findings from PAR Phase I show need of increased awareness of PSEAH and acknowledgement of experiences, better reporting and remedial mechanisms, increased accountability to affected people and protection from Sexual Exploitation and Abuse AAP/PSEA Ecosystem.

Phase 2 is currently underway, piloting innovative programmatic approaches, advocating for accountability, developing guidance and modelling scale-up scenarios in three humanitarian settings: Palestine, Bangladesh, and Ethiopia. Early insights from these pilots have highlighted the importance of involving affected communities and working with local, trusted, intermediaries in project design and implementation.

Source: (CHS Alliance, ISS, Erasmus University, Netherlands Ministry of Foreign Affairs, 2020[38]; CHS Alliance, 2023[39])

Safe response and protection

As per the DAC Recommendation:

> *"Provide integrated and safe response and protection for those who report SEA and SH, including survivors and victims, in collaboration with relevant stakeholders such as: the United Nations; Civil Society Organisations (CSOs) and local women's organisations; local and national governments where safe and appropriate; and public bodies including local authorities. Adherents should develop guidance and minimum standards for survivors' and victims' assistance, redress, and support, including by mapping out key stakeholders and service providers for referrals, and by seeking to provide required financing support that is jointly supported to the maximum extent practicable."*

Comprehensive support for SEAH victims/survivors requires a multi-sector and multi-actor response – and often involves specialised experts. Providing safe response and protection to victims/survivors requires assistance and support.

This requires consultations with victims/survivors, assessment of needs and resources, and may involve a range of response actions that will be unique and specific to each victim/survivor and each context. There are, however, essential services that should be safely accessible and available to any victim/survivor. Even though organisations often make the distinction between different kinds of misconduct, including SEA and SH, there are core principles that apply to both SEA and SH, and the kind of support that is necessary.

It also important to recognise that certain instances of SEAH may be perpetrated in remote areas, where support services are either very limited or there are no services available. Geographical location is not the only limiting factor, and in other circumstances, due to the complexity of the environment, or the prioritisation of resources by the organisations present in a given context, may mean that services are often limited. However, the availability of support does not change the level of support that is required.

Protection and services

There are key elements that need to be considered when defining what should be included in victims/survivors assistance and support. This consistently should take into account the victims/survivors' recovery and needs.

Victims/survivors of sexual exploitation, abuse, and harassment have a right to assistance and support. The responsibility for providing support will depend on the particular context and allegation, and who the victim/survivor may trust, feel safe with, or identify as relevant to their recovery efforts. The organisation involved will also depend on the particular case, this could imply the organisation of the perpetrator, or may imply other organisations or entities that are connected to the organisation through partnership or funding arrangements. The organisation should provide services directly (in some circumstances) or can make safe referrals to appropriate services. Ensuring comprehensive protection and support services for SEAH victims/survivors often involves a web of actors, including:

- Governmental actors:
  - Bilateral donors present in implementing environments and in capital; and
  - National or Host governments operating both through public service provision and as employers of national aid workers, as well as being overseers of existing and prospective legislative rules and regulations that may pertain to abuse, exploitation, discrimination, human rights etc.;
- Multilateral actors, including international organisations and international NGOs/CSOs;

- Civil society organisations operating at various levels (national/sub-national/local), including those specialising in women's rights and legal aid; and Community-based organisations.
- External experts, providers, and case workers (for example, GBV case workers);

Establishing **minimum standards/guidelines** for victims/survivors' assistance and support helps to better protect and serve victims/survivors. There are overarching principles that should be applied in terms of the scope, timing, and roll-out of such services.

When establishing services for the victim/survivor, it is important to minimise risks of victim/survivor stigmatisation, and further harm by the perpetrator, their family, or from their own family or community. During each step of the process from report, investigation, and subsequent actions, risks for SEAH victims/survivors can increase. Protection of the victim/survivor is itself a form of assistance.

The UN Protocol on the provision of assistance to victims of sexual exploitation and abuse provides guidance for the humanitarian and development systems[13]. Other organisations[14] have developed guidelines and notes on specific processes and implementing a victim/survivor-centred approach to assistance/support. It is also important that these guidelines are effectively communicated and transmitted to relevant actors, including partners and other local organisations.

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[13] In 2007, the UN General Assembly adopted the United Nations Comprehensive Strategy on Assistance and Support to Victims of Sexual Exploitation and Abuse by United Nations Staff and Related Personnel. The UN Protocol was adopted in 2019.

[14] This includes, for example, InterAction, who has developed Core Standards for Survivor-Centred Support of Sexual Exploitation Abuse and Harassment Core Standards for Survivor-Centered Approach for SEAH canva.pdf (interaction.org)

Table 2.4. Key Questions and considerations relevant in establishing minimum standards and guidelines for victim/survivor support

Question	Tips
How do you define the timing of assistance?	There is no generalised timeline in terms of how long assistance should last, this depends on each individual case.[15] The timeline for support should also take into consideration dependents of the victim/survivor, such as for cases where children are born out of SEA. Support should start when an allegation is received, it does not need to wait until an investigation has started. Support/assistance is not reliant on proof of credibility of a claim, and it should also not be linked to the victim/survivor's co-operation or participation in an investigation or other accountability procedure.
Who decides what services/support should be provided to the victim/survivor?	An "opt out" approach to services/support should be used (as opposed to an "opt in"). All individuals who submit a complaint should automatically be offered support and assistance (with the consent of the victim/survivor). This takes away the onus being put on the victim/survivor to ask for support (when they could be unable to do so, be unaware of what support exists). This also increases the chances of providing comprehensive support across all sectors/areas, and avoids delays in the start of this support. In some instances, those receiving a complaint may wait to see if the victim/survivor or complainant is showing signs of ill health before intervening to offer more support (in line with an "opt in" approach). However, this may be problematic, as it leaves the victim/survivor unsupported and may lead to delay in recovery.
How should support/assistance be tailored to individual cases?	Special considerations should be integrated for specific groups, such as children. Other considerations including consideration of vulnerabilities should also be included [see section below].
Who is responsible for providing support/assistance? How should service provision be coordinated, including involving external entities?	A dedicated case worker should coordinate services that are necessary for victim/survivor support.[16] Wherever specialised services exist, they should be offered to the victim/survivor. Gaps in service coverage should be identified, and additional resources provided to cover any gaps. It is also important that the services/assistance provided to the victim/survivor are recorded, assessed for quality, and tracked. Recording services also helps ensure that in the instance of turnover within an organisation, this information is not lost; in addition, if the case in question involves multiple country missions (in the case of SEA in the field) the need arises to share information on the record of services/assistance provided, with respect to privacy and confidentiality.

The list below was developed based on UN guidance around comprehensive assistance and support. While these were developed in the context of cases of SEA, victims/survivors of SH also require comprehensive support and assistance, based on similar principles (UNGA, 2007[40]; United Nations, 2019[41]; United Nations, 2021[27]).[17] In many SEA contexts, there are no services at all and it might be useful to make this clear and suggest how donors and others could assist. Generally support is provided by implementing partners, generally GBV or CP practitioners. They may not exist in remote areas and where they do, they may not have the expertise needed to deal with victims of SEA or understand the importance of legal assistance for them. Again, this is an area where SEA and SH victims may be in a different situation given that the latter are generally more informed.

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[15] Frequently asked questions on the scope and duration of assistance for victims of SEA by UN staff and non-staff personnel (UN OVRA) un-ovra-faq-booklet-scope-duration.pdf

[16] All members of staff and volunteers should be aware of the referral pathways and available services, in the case that they need to direct victims/survivors to those services. However, this does not mean that they are then responsible for case management, unless they have the skills and it is their specific role in the organisation. The case manager or case worker should be a dedicated function. Further guidance: IFRC Toolkit: Guidance on Basic Case Management and Basic Referral Pathway and PSEA Operational Manual.

[17] The UN Protocol and Technical Note also provide guidelines on how to (1) assist a victim, (2) address special considerations for child victims, (3) address gaps in services, and (4) support effective coordination and integration of victim assistance into country frameworks.

Table 2.5. Establishing comprehensive services for victims/survivors

Type of Service	Description
Safety	Immediate safety or protection measures for victims/survivors, witnesses, and complainants to address the risk of retaliation or further violence, such as survivor safety planning, safe shelter (i.e., a space that offers temporary safety to individuals fleeing harm), relocation support.
Immediate medical care (including Clinical Management of Rape (CMR))	Immediate medical response to injuries, administering of medication to prevent or treat infections, and prevent unwanted pregnancies. Treatment within 72 hours should be provided, particularly to administer post-exposure prophylaxis (PEP) for HIV or emergency contraception; survivors may present much later than 72 hours and still require treatment. Clinical Management of Rape (CMR) can include treatment, counselling, and follow-up care as well as the collection of forensic evidence and the provision of a medical certificate. It is important to note that medical staff are not in a position/expected to make a legal determination as to whether an individual was sexually assaulted or not. For victims/survivors who get pregnant and give birth to children as a result of sexual exploitation and abuse this can also include prenatal and postnatal care.
Physical health and related provisions	Kits are generally provided to women and girls and typically contain standard hygiene items such as sanitary napkins, hand soap, toothbrushes, toothpaste, and underwear, as well as information on available GBV services, including where and how to access those services.
Mental health and Psychosocial support	Mental health care, emotional and practical support, either individually (by trained social workers) or community based. This also includes counselling and case management, assessment of service needs, and provision of information and referral of victims/survivors to other services to provide support to meet their needs. Victims/survivors who experience severe responses to abuse and trauma may require specialised services from mental health professionals, such as a psychologist or psychiatrist, in a manner appropriate to the local social and cultural context.
Legal services	Legal assistance services, including free legal counselling by an attorney/legal aid provider of their choice, legal representation, advocacy, and other support. Legal assistance may be part of gender-based violence (GBV) and child protection (CP) referral pathways and/or be included in a one-stop centre, as part of a holistic approach. A GBV/CP subcluster coordinator and/ or specialist may be able to assist victims/survivors in locating legal service providers. For accountability processes that involve multiple jurisdictions, transnational legal assistance should be provided, where needed and based on the victim/survivor's wishes.
Basic material assistance, socio economic empowerment/livelihoods	Provision of food, clothing, shelter, education assistance (to prevent dropout or promote school re-integration) and livelihood support (examples are income-generating initiatives, vocational training and cash-for-work for adults and skills training and savings schemes for older adolescents). Where the victim is a child, the child's caregivers should have access to livelihoods assistance based on their and the child's needs.
Support for children born as a result of SEA	Medical and psychosocial care and pursuit of paternity and child support claims, in conjunction with relevant national governments. The UN may also facilitate the pursuit of claims of paternity and child support and ancillary benefits, such as the nationality or citizenship for children born of SEA. This could be pursued by a guardian or the child themselves. The UN should refer victims to legal assistance in line with their wishes and can link them with the appropriate officials in the country where they wish to bring their claim.

Box 2.7. Example of support provided in cases of SH and SEA: Canada

The Government of Canada condemns all forms of gender-based violence (GBV). This starts from the expressed values of leadership, corresponding guiding policies and treasury report. The work is undertaken by all departments and agencies. Federal departments and agencies in the core public administration are required to make available to employees a confidential employee assistance program. There is also an expectation that the Canadian civil society sector upholds the same values. Global Affairs Canada (GAC) has put in place an **Employee Assistance Program (EAP),** which provides a range of services to its staff, including survivors/victims of workplace and sexual harassment. All services and counselling are guided by the Value and Ethics code for the Public Sector, and a confidentiality policy.

The program includes provisions such as free short-term counselling for personal or work-related problems as well as crisis counselling. It also provides Employee Assistance Program counsellors – this team offers confidential active-listening skills and provides: (1) Counselling for employees; (2) Advice for managers; (3) Crisis intervention and critical incident debriefings; and (4) Trainings.

In order to ensure a survivor-centred approach and reinforce support services, Global Affairs Canada has put in place several other accompanying activities. This includes the organisation of mental health weeks and other awareness raising and culture shifting initiatives. More broadly, this starts from the expressed values of leadership, as the Government of Canada condemns all forms of gender-based violence (GBV), and there is an expectation that the Canadian civil society sector to uphold same values. All policies are taken into account and put in the treasury report. The mandate of Global Affairs Canada (GAC) expressively mentions the use of a victim-and-survivor centred approach. Work is also based in the Women and Gender Equality department, leading the GBV policy team and placing the needs of victim/survivors above all. There is a National Strategy and Action Plan that implements these approaches, and a Knowledge Center.

Sources: Government of Canada (2023[42]; 2023[43]; 2023[44]) Women and Gender Equality Canada and Canada's Feminist International Assistance Policy; and Canada's National Action Plan on Women, Peace and Security (international.gc.ca) and Canada's National Action Plan on Women, Peace and Security.

Understanding risks and specific considerations for different groups

It is important to take into consideration other factors, which may affect a SEAH victim/survivor. Intersecting inequalities can have varying degrees of impact, and this can include groups and people most at risk of discrimination, including on the basis of, for example, sex, disability, gender identity and sexual orientation, race, ethnicity, age, or religion (OECD, 2022[10]).

The provision of assistance to **child victims** should take into account the capacities of the child (UNGA, 1989[45]), and respect the principles of non-discrimination; the best interests of the child; their right to life, survival, and development; the evolving capacity of the child and their right to express their views and have them considered. The involvement of the child's parent or legal guardian in the provision of assistance may also be required (United Nations, 2021[33]), when appropriate, and in the best interest of the child.

Issues of safety and protection are particularly central in relation to SEA child victims. A number of initial considerations should be taken into account, such as clear policies around the process of interviewing children and involvement of police or national authorities (when appropriate); the involvement of child protection agencies in country, which are often cross-sectoral, including social services, police, health, education; and the evaluation and mitigation of risks around child safety and protection that are specific to

local contexts. Best practice and established guidelines in relation to child protection should be respected Box 1.10.

Many entities – whether government, international organisations, and CSOs – have taken steps to better coordinate their efforts around SEA and child protection. Taking into account their evolving capacity, child victims require special support, such as the appointment of a trained and trusted support person to accompany the child throughout the course of the investigation. This practice can also apply to other victims/survivors in vulnerable situations. Organisations should not be interviewing children about SEA except in very exceptional circumstances. Normally this is for the police (in most countries we work in) - and where it may not be justifiable to involve the police for safety reasons - then robust standards must be met (see IQTS manual on interviewing children for example), and clear policies in place for this eventuality. Child protection agencies in country are likely to be critically involved and these will often be cross sectoral - social services, police, health, education. Organisations can encourage national government partners to strengthen their approaches and work with them to achieve this. Risks in local solutions need to be assessed and mitigated as far as possible - child marriage outcomes, for example.

Learning can also be drawn from established practice and developed guidelines around VAWG and GBV, including for specific considerations on victims at different ages (such as **adolescents**), or those in transit or on the move Box 1.10 Box 1.11.

Organisations have increasingly integrated considerations for specific groups of people, in order to refine their approach and provide appropriate and comprehensive support better. For example, Canada has taken into account the needs of **indigenous people** bearing mind intersectionality through, among other things, the express requirements to apply Canada's Gender-Based Analysis + to all initiatives, policies, and treasury submissions. Canada also hosts an Indigenous Women's Circle to engage with Indigenous women leaders and experts in the public and private sector on the challenges they face and their priorities for the Government of Canada related to advancing gender equality and ending gender-based violence.[18]

There are also special considerations related to victims/survivors with **disabilities**. Protocol around assistance should take into account logistical and other arrangements that need to be provided (translation, transportation, etc.) to facilitate access to assistance.[19]

For victims/survivors identifying as **LGBTQI+,** in many humanitarian settings for example, there are few specific programmes for these populations, and availability and access to services remain severely lacking. In many contexts, these victim/survivors are also at high risk of reprisals. More research is needed to establish appropriate models respond and support these populations. [20] [21] It should be noted, also, that

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[18] Additional resources: The Knowledge Centre, in collaboration with Statistics Canada, provides disaggregated data for Indigenous Women, girls and 2SLGBTQQIA+ (Lesbian, Gay, Bisexual, Transgender, Queer, Questioning, Intersex, and Asexual Plus) people; Crown Indigenous Relations and Northern Affairs; and Indigenous services Canada.

[19] Additional resources: Disability-inclusive Child Safeguarding Guidelines | Able Child Africa ; Pocket Guide: Safeguarding persons with disabilities and/or mental health conditions in CSO programmes | Safeguarding Resource and Support Hub (safeguardingsupporthub.org) Tip Sheet on people with disabilities in the Safeguarding Journey from the Resource and Safeguarding Hub; Evidence Map on SEAH for people with disabilities (Disability Helpdesk); Able Child's guidelines on safeguarding children with disabilities: Disability-inclusive Child Safeguarding Guidelines | Able Child Africa"

[20] "That Never Happens Here": Sexual and Gender-Based Violence Against Men, Boys and/Including LGBTIQ+ Persons in Humanitarian Settings.

[21] Further information on sexual orientation and gender identity and specific risks related to violence: "Discriminatory laws and practices and acts of violence against individuals based on their sexual orientation and gender identity. Report of the United Nations High Commissioner for Human Rights".

these victims/survivors are at great risk of reprisals, including violence, so the need and type of programmes should be carefully considered before establishment.

Box 2.8. Working with adolescent girl GBV survivors on the move: a guide for service providers, UNICEF LACRO in partnership with VOICE

Established guidelines in gender-based violence and lessons learned from different contexts can also be applied to cases of SEA.

The *Guide for service providers in Latin America and the Caribbean (LAC) on working with adolescent girl GBV survivors on the move* focuses on adapting services to support individuals in transit, as they often cannot benefit from traditional service delivery models that are designed for displaced populations in settlements. It also provides links to resources that support traditional delivery models and highlights how adaptations may differ between the two. The geographic and demographic focus responds to the mass movement of refugee and migrants in the region.

Due to the additional risks and violence they face, the Guide focuses on working with adolescent girls. This group accounts for an increasing proportion of displaced persons, but services are often not tailored to their specific needs and age, instead targeting adult GBV survivors or offering child- or youth-focused services that do not have a gender focus. The Guide provides outlines of how to understand **risk**: what kinds of GBV risks exist for this population; and how to work with girls to understand and reduce risk; how to use information to reduce risk, and respond to immediate needs; and how to reduce risks related to physical space.

The Guide also provides information on: essential services and considerations for providing quality services, and how to adapt services to this specific group. Services must be tailored to adolescent girls' needs and experiences in order to serve them well and help them survive and thrive during times of crisis and displacement.

Source: (UNICEF, 2020[46]) Source: UNICEF (2020[46]) [Working With Adolescent Girl GBV Survivors On The Move](#)

Box 2.9. INSPIRE: seven strategies for ending violence against children, WHO-UNICEF

INSPIRE: Seven strategies for ending violence against children (WHO-UNICEF) sets out evidence-based strategies for countries and communities working to eliminate violence against children, and serves as a key global resource for implementing, adapting and monitoring interventions to prevent and respond to violence against children.

INSPIRE is an acronym for seven strategies: I for the implementation and enforcement of laws; N for norms and values; S for safe environments; P for parent and caregiver support; I for income and economic strengthening; R for response and support services; and E for education and life skills. In addition, two cross-cutting activities – multisectoral action and coordination and monitoring and evaluation – help connect and strengthen the seven strategies and track the extent of their implementation and impact on the problem.

The *Global status report on preventing violence against children 2021* explores countries' progress on ending violence against children through the seven INSPIRE strategies. It shows, for example, that on average 88% of countries have laws in place for preventing violence against children but just 47% of government respondents felt that these laws were enforced strongly enough to ensure violators would be penalized.

Following the 2016 launch of the "INSPIRE core document" in six UN Languages, the INSPIRE technical package was expanded to include five more resources: INSPIRE Handbook, INSPIRE Indicator Guidance and Results Framework, INSPIRE Guide to Adaptation and Scale Up, INSPIRE Competency Framework and INSPIRE Massive Open Online Course.

Source: WHO (2022[47]) INSPIRE: Seven strategies for ending violence against children.

Box 2.10. Responding to violence against women based on their diverse sexual orientations, gender identities and expressions, an annotated bibliography of resources – GBV AoR Global Protection Cluster

Lessons for considerations of SEAH victim/survivors can be drawn from the compendium of resources on *Responding to violence against women based on their diverse sexual orientations, gender identities and expressions* (SOGIE). The GBV AoR Help Desk was started by the GBV AoR Global Protection Cluster in 2021, and has produced this resource compendium. The Help Desk is a research and technical advice service, aiming to inspire and support humanitarian actors to help prevent, mitigate and respond to violence against women and girls in emergencies. Resources were identified through online desk-based research. These include, for example:

- Interagency Gender-Based Violence Case Management Guidelines IMC, IRC, UNFPA, UNICEF, UNHCR, USAID (2017)

This resource sets out standards and good practice for providing quality and compassionate care and support to **GBV survivors in humanitarian settings**. The resource largely focuses on women and adolescent girls, which is followed by a section on GBV case management with other groups, including **working with LGBTI persons who have experienced violence**. The section on working with LGBTI survivors focuses on i) terms and definitions that are important for working with LGBTI survivors, ii) barriers that LGBTI survivors may face to accessing care, and iii) providing care and support in a safe and welcoming manner for LGBTI survivors. This includes special considerations for how to carry out safety planning with LGBTI survivors.

- LGBTIQ+ Inclusion in Humanitarian Action: LGBTIQ+ Vulnerabilities and Capacities in Crisis IPPF (2019)

This resource from the International Planned Parenthood Federation (IPPF) sets out the organization's commitment to LGBTIQ+ inclusion and outlines recommendations for how the Minimum Initial Service Package for Sexual and Reproductive Health (MISP for SRH) can be LGBTIQ+ inclusive. The recommendations cover different action areas including **prevention and response to sexual violence.** The recommendations focused on preventing and responding to sexual violence focus on ensuring privacy for LGBTIQ+ persons; strengthen awareness of informal networks that LGBTIQ+ survivors of sexual violence may turn to; create safe and stigma free spaces for LGBTIQ+ survivors; and develop inclusive referral mechanisms. The resource also includes brief case studies of LGBTIQ+ inclusive humanitarian response in the Asia and Pacific Region.

Source: GBV AoR, (2021[48])Gender-Based Violence Area of Responsibility, https://gbvaor.net/support.

Quality and availability of services

As per the DAC Recommendation:

> *"Seek to strengthen existing local services and networks and coordination with gender-based violence and child-protection services, also to address violence against girls, where appropriate. A survivor- and victim-centred approach should be integrated into broader efforts to strengthen responses to gender-based violence and SEA and SH at the local level, including strengthening the rule of law and access to justice. Efforts should aim to improve the quality and availability of referral services and protection mechanisms to minimise the risks of survivor and victim stigmatisation."*

Connection to referral systems and other services

The quality and availability of services and protection mechanisms for SEAH victims/survivors at country level often relies on the quality and availability of gender-based violence (GBV) and child protection services and programmes (IASC, 2018[49]). Long-standing GBV and child protection approaches and existing pathways provide a basis for improving support to SEA victims/survivors (IASC, 2015[50]; UNFPA, 2022[51]; Protection Cluster & UNHCR, 2022[52]). The IASC Inter-Agency Sexual Exploitation and Abuse Referral Procedures (IA SEARP), aims to provide guidance on a standardised model of procedures for inter-agency referral of SEA complaint and survivors, for members to use when designing or updating country-level procedures (Inter-Agency Standing Committee, 2023[53]).

Agencies should map out key stakeholders and/or service providers for victim/survivor's referrals in countries (and updated at regular intervals) (UNICEF, 2014[54]), and actively integrate these stakeholders into prevention and response mechanisms. Where possible, information should be shared between partners[22]. Coordinating with other agencies, clusters or subclusters (within implementing contexts) – such as Protection, GBV, Child Protection, PSEA, etc. – as these referral pathways may already be established, or the mapping exercise for services already completed (IFRC, 2020[55]). For example, the UN Office of the Victims' Rights Advocate completed mapping for a number of countries, which it keeps updated (UN OVRA, 2020[56]). Even when referral pathways exist, organisations should make sure that they respect principles of "do no harm' (IFRC, 2021[57]).

Connecting victims/survivors to the appropriate professionals who can provide specialised support, for example for psychological or legal support, can be challenging. This poses difficulties especially for governments or organisations with small in-country presences and reinforces the need for close collaboration and sharing of information and donor coordination.

In order to have a more effective approach to ending SEAH, the bilateral/multilateral donor/agency and/or its implementing partners should integrate SEA and SH into broader efforts to strengthen responses to GBV at the local level, and SEA and child protection. This can be carried out through closer collaboration with relevant experts within the organisation, and partners across sectors; it also is reinforced through support to existing local services and networks. While it is assumed that SEAH referrals may be made to existing GBV and CP services, in many development and humanitarian environments, these services are unavailable, heavily underfunded, or non-existent. With this understanding, the action of making a referral

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[22] Referral channels can also include different geographic and/or administrative levels, such as: (1) Local referral mechanism – government entities or service providers at the local level; (2) National referral mechanisms – government entities and service providers at the national level; and (3) Transnational referral mechanisms – these mechanisms serve to link various stakeholders from two or more countries involved in the identification, referral, and assistance of the victim/survivor. See Guidance on Referral Mechanisms, https://publications.iom.int/system/files/pdf/iom_guidance_on_referral.pdf

is not sufficient, and the different services themselves need to not only be better coordinated, but also better supported and funded through different donors and mechanisms.

Box 2.11. Example of SEA referral pathway

The IASC Best Practice Guid lays out an example of an assistance pathway, which could be applied to SEA complaints. This model pathway would need to be applied to specific contexts, taking into account the availability and funding of such services and referral pathways. Components of the referral pathway include:

- Reporting by the Complainant (i.e., conducting a needs assessment for victim/survivors and/or complainants)
- Medical Care (i.e., examination or treatment of injuries, prevention of disease and/or unwanted pregnancy, and collection of forensic evidence)
- Safety and Security (i.e., conducting an immediate security and needs assessment, and creating a security plan that addresses ongoing and additional risks)
- Mental Health and Psychosocial Support (i.e., providing counselling and support to assist recovery from the psychological consequences of SEA)
- Legal/Justice Response (i.e., providing the victim/survivor with the appropriate avenues for seeking legal counselling if they so desire)

Source: IASC (2016[58]) Best Practice Guide : Inter-Agency Community-Based Complaints Mechanisms, https://interagencystandingcommittee.org/system/files/2021-03/Best%20Practice%20Guide%20Inter%20Agency%20Community%20Based%20Complaint%20Mechanisms.pdf.

Limiting factors on access to services

Barriers to **accessibility** should be taken into consideration: even when services exist or where referral pathways are established, victims/survivors can face barriers to access. These can include geographic and physical restrictions, such as distance to services and lack of security. They can also involve administrative or budgetary limitations, such as the cost of services or administrative barriers. The service provision themselves can be disrespectful of the above-mentioned principles, which also create barriers to access, such as lack of privacy and confidentiality in services; lack of trained female staff; or perception that services are not available or friendly to certain groups of people. And finally, community and/or family barriers: perceptions of services by people in the community; or community beliefs about sexual purity and family honour; or family pressure to not seek services (IMC, IRC, UNHCR, UNFPA, UNICEF & USAID, 2017[34]).

Figure 2.2. Lessons learned – gaps in referral mechanisms for assistance (SEA)

Source: UN OVRA (2020[56]), Mapping of Victims' Assistance.

The situation of **rule of law and access to justice** in a country often have an impact. How services and assistance are provided to victims/survivors may rely on the legal environment, and institutional frameworks. Beyond the specific legislative frameworks that govern violence or harassment[23], there are a number of broader issues that can have an impact on SEAH service provision specifically. It is important to take into account how women/girls are referred to in national/legal frameworks, or how other groups are considered or protected, or in some cases, not acknowledged (this includes, especially, people or groups in vulnerable situations, such as those who identify as LGBTQI+, etc.). These factors have impact on how services can be provided and to what extent; and can also have an impact on the victim/survivor's ability to access services.

It is also important to recognise the numerous levels of legal proceedings in which the victim/survivor is often involved, even in relation to one allegation of abuse. For example, in the case of alleged abuse, there are often ongoing criminal, civil, family, and other legal proceedings simultaneously, which are all interconnected (OECD, 2021[59]). In circumstances where the alleged perpetrator is a foreign national or is subject to diplomatic immunity, there are additional levels of complexity.

Legal proceedings can often be tied to the provision of services, and may impact the timing of the delivery of such services. Many victim/survivors can face impediments to receiving services, or not receiving services in a timely manner, due in part to this complexity or due to a lack of understanding of legal systems and requirements.

In some circumstances, official legal processes may be superseded or contradicted by rules and regulations in place within certain communities, or by informal authorities. Governments and other

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[23] Additional references in the World Bank Group Compendium of International and National Frameworks on Sexual Harassment in the Workplace.

organisations should take into account these multiple levels and specifics relating to the local, regional or national context when assessing how to best establish SEAH response and support systems.

Collaboration and co-ordination with stakeholders on support services

Collaboration across relevant actors needs to be ensured, in order to provide integrated and safe response and protection for those who report SEAH. Better co-operation strengthens the overall operating environment, leading to a more protective environment. In certain contexts (notably for cases of SEA), this includes government agencies with UN, CSOs, local women's organisations, and national or local governments. While historically, the UN and international NGOs have been included in collaboration efforts, more recently, there have been an increase in efforts including local NGOs and local government counterparts.

In terms of the services infrastructure in the field in humanitarian and development contexts, a number of roles have been established. This includes co-ordination structures across missions or country teams, technical inter-agency coordinators, PSEA networks and focal points, Senior Victims' Rights Officers, and Victims' Rights Focal Points, relevant humanitarian clusters and sub-clusters, etc. Technical or specialised expert support should also be included in co-ordination efforts.

Inter-agency co-ordination is important as to avoid the overreliance on one agency to provide all kinds of support. Specialised agencies are not present in all countries/regions, so while it is remains essential that expert agencies or organisations provide guidance and are available to provide support (i.e., UNICEF for child protection), all organisations and entities need to be well-informed and able to put in place these services, without overreliance on one source.

Table 2.6. Understanding challenges and roadblocks to effective collaboration between stakeholders around victim/survivor assistance

Area of consideration	Explanation/Tips
Localising SEAH response efforts in providing victim/survivor assistance	The absence of tailoring or contextualising SEA/SH responses can lead to a breakdown in collaboration between actors, and less effective provision of assistance for victims/survivors. It is important to take into account the specific regional, country, and local context within which SEA responses are taking place. For example, even when a country-level analysis or perspective is available, there may be more specific contextual challenges, especially in regard to lack of services, and the roles and responsibilities that need to be clarified. An ongoing challenge is the need to coordinate more with local government counterparts on responding to and preventing SEAH. Without proper coordination, a survivor-centred approach, and principles, and ensuring victim/survivor assistance, will be undermined. Engagement with national governments also needs to be contextualised and adapted to each specific environment (region/country/sub-national context).
Funding of victim/survivor assistance	Ensuring resources and financing of support services remains a challenge. This is particularly challenging in some humanitarian or development contexts that are remote or in complex environments (i.e., those with security concerns, etc.)[24]. The specialised capacity necessary to provide comprehensive support for SEAH victims/survivors is often lacking. In the case of governments or international organisations, this could be better supported from headquarters to country-level focal points: there is a need for greater investments in technical capacity in headquarters and to the field support teams. Bilateral donors or governments may also face challenges, as they can have small representations with few officials working in embassies or country offices. This lack of permanent staff in field offices, or having more temporary staff/consultants, can pose a problem in terms of their capacity to engage with appropriate partners and know how to coordinate to ensure that services are provided.

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[24] Further information around violence in conflict contexts: Conflict-related sexual violence : report of the UN Secretary-General (2022).

Area of consideration	Explanation/Tips
Data sharing and information	The sharing of information while respecting data privacy and confidentiality around SEAH cases can be a challenge. It is important that standards around data sharing and privacy are respected, and that these are understood within an organisation – such as the Minimum Standards for Prevention and Response to Gender-Based Violence in Emergencies for guidance on victim/survivor data.[25]
	There is also a reluctance from some organisations to share information surrounding a victim/survivor, even in the case that this information is being requested in order to better support the victim/survivor (for example: when headquarter entities request information on the process, in order to ascertain how to provide additional support). There are often challenges around a lack of clarity of the notion of confidentiality and consent from victims/survivors. It should be made clear that requests for information regarding victims/survivors on a need-to-know basis for the purposes of ensuring adequate support does not encompass information and details concerning the allegation or investigation process.
	In some instances, the question is raised as to the use of data in order to better inform analysis of an overall context.
	There is also a question around the validity of sharing information for the purposes of assessing risk in a particular context. This is interpreted by some organisations as potentially useful, so that other entities operating in that context (even if they were not involved in the specific allegation) can be aware of the risks and help identify the contextual/environmental factors that may be contributing to this increased risk. This approach could also help organisations to learn more about what interventions are being used and help assess their effectiveness.

Funding and resources for services

Institutions channel their funding and resources for services to SEAH victims/survivors through multiple channels. First, organisations should provide adequate funding and resources for services provided to SH victims/survivors within their institutions. This often necessitates establishment of specialised services, and the use of external providers or experts that are not present within the organisation. Organisations should also guarantee that services/assistance pathways in the field in which they are operating are sustainably funded, in collaboration with other relevant partners, who are involved in service provision. In addition, as many SEA victims/survivors are often channelled through existing referral pathways, such as those used for GBV or child protection, these services are only functional if they are well-funded and coordinated.

Joint funds and trust funds, such as the UN Trust Fund in Support of Victims of Sexual Exploitation and Abuse can also facilitate provision of assistance. Some bilateral donors have either used specific budgets to fund and support service delivery, or strategic level projects that are believed to inform, support research, develop technical standards, guidelines (global projects). In some instances, support to PSEA can also be provided from regional budgets.

In order to avoid duplication of efforts and better coordinate, governments and other international stakeholders could consider pooling resources for certain activities related to support services. For example, this could include joint projects to map available services, providing funding for services, a common trust fund). Pooled resources are also important for accountability purposes; and could also offer a mechanism for sharing information, including on funding and resources.

Resource implications should be taken into consideration when establishing SEAH policies, strategies, and setting up institutional mechanisms to respond to and prevent SEAH. They should also be included in longer-term financing and investment decisions, including development programming.

Currently, levels of financing towards GBV more broadly, remain low when considering certain categories of donors. For example, bilateral allocable official development assistance (ODA) committed by DAC members towards ending violence against women and girls (VAWG) in 2020-21 amounted to USD 458 million on average per year. This is less than 1% of bilateral allocable ODA reported in the same period. This also aligns with the overall trend of low levels of investment in gender equality through bilateral ODA

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[25] Other guidelines such as the Harmonised SEAH Data Collection and Reporting Template developed by CHS Alliance.

(OECD, 2022[60]). Donors need to specifically target prevention and response to SEAH in their development and humanitarian programming decisions, but also align these efforts with prioritization of gender equality[26]. It is therefore important to consider the following efforts in tandem: mainstreaming of SEAH into development programming; ensuring sufficient regional budgets; and considering increasing budgets for GBV, as these services are often the ones provided to SEAH victims-survivors.

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[26] See the Gender Equality and the Empowerment of Women and Girls: Guidance for Development Partners.

Checklist on Pillar 2

DAC members can helpfully ask the following questions:

On victim/survivor-centred approaches in institutional frameworks:

- Are victims/survivors' experiences, rights, dignity, needs, and wants at the centre of organisation-wide efforts?
- Are complaints mechanisms adapted to the SEAH victim/survivor, taking into account barriers and specific local and cultural contexts? Are the services available clearly explained and communicated to staff within the government, in implementing partners, and communities?
- Do feedback mechanisms include provisions to provide regular information and feedback to the victim/survivor; as well as the option for the victim/survivor and others to provide feedback to the organisation?
- Doe sthe organisation allocate resources to supporting the victim/survivor (whether SH or SEA)? Has the use of a SEAH victim/survivor support advocate or specialist been considered?
- Do policies and procedures take an intersectional approach and special consideration of those in vulnerable situations? This includes women and children, as well as people most at risk of discrimination on the basis of, for example, disability, gender identity and sexual orientation, race, ethnicity, migration status, age, or religion.
- Are there appropriate principles, processes, and mechanisms in place to address SEA against children?

On support to victim/survivors:

- Have guidance and/or minimum standards been developed for survivor/victim assistance? Does this include considerations around the timing, scope, provision, and funding of support?
- In partnerships with implementing partners and other actors, are responsibilities surrounding victim/survivor support and assistance, and the coordination necessary, taken into account?
- Have additional resources been allocated for services and referral pathways for SEAH victim/survivors? Have existing services and local networks been mapped? Is there coordination with GBV and child-protection services?
- When coordinating with partners, are there appropriate data protection measures in place regarding sharing of information on victim/survivors, their cases, and the support provided?
- When considering development and humanitarian funding decisions, including around ODA, are projects and programs targeting SEAH included? Do funding decisions in related sectors such as gender equality, heath, governance, etc. also take into account SEAH considerations?

3 Pillar 3 – Reporting and complaints mechanisms

Setting the context: what impacts how victims/survivors approach reporting

Underreporting of SEAH remains common. Lack of reporting does not necessarily indicate that no abuse is being perpetrated, but rather that victims/survivors are not reporting, and existing mechanisms are not being used and/or are not trusted[27]. Subsequently, in the event that there is an increase in the number of complaints submitted, this does not necessarily indicate a sharp rise in the levels of abuse being perpetrated, but rather that systems are becoming more effective, and are being increasingly trusted.

Reporting systems and their use are important elements of institutional frameworks to address SEAH, but it is important to note that an organisation or institution should not wait for cases to be reported before putting in place policies and processes to prevent and respond to SEAH; and taking action to establish a more supportive organisational culture.

Institutions are increasingly approaching SEA and SH together; and in some instances, reporting mechanisms may handle both SEA and SH allegations together. While the actors involved and the subsequent actions (investigations, etc.) may differ depending on each case, and SEA and SH specifically, victims/survivors of SEA and SH have the same rights and needs. Victim/survivors may also find it difficult to distinguish between reporting mechanisms for SEA and SH. In some cases, allegations of SH may qualify as SEA, and some cases of SEA as SH. In addition, a prevalence of SH cases can be demonstrative of an organisational culture that perpetuates impunity for this kind of abuse/behaviour, which may lead to a tolerance of SEA. Moving towards prevention of both SEA and SH requires tackling the same underlying causes, gender inequality and power differentials.

Barriers to the effective use of reporting mechanisms

Many victims/survivors do not report sexual exploitation, abuse, or harassment because they do not know organisations have policies against such acts, are unaware of or unable to access reporting mechanisms (e.g., if it is located inside an implementer's office, requires access to the internet, a phone, or literacy),

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[27] Learning and guidance in the field of GBV in humanitarian contexts points to underlying assumptions that should be applied, and should be applied when considering the risk of SEAH. Regardless of whether the prevalence or incidence of various forms of GBV is 'known' and verified, it is important to remember that GBV is happening everywhere. It is under-reported worldwide, due to fears of stigma or retaliation, limited availability or accessibility of trusted service providers, impunity for perpetrators, and lack of awareness of the benefits of seeking care. Waiting for or seeking population-based data on the true magnitude of GBV should not be a priority in an emergency due to safety and ethical challenges in collecting such data. With this in mind, all humanitarian personnel ought to assume GBV is occurring and threatening affected populations; treat it as a serious and life-threatening problem; and take actions based on sector recommendations, regardless of the presence or absence of concrete 'evidence'. (IASC, 2015[50])

doubt their complaint will be dealt with seriously, and/or they distrust the system, and/or they fear retaliation.

It requires courage to come forward and submitting a complaint can be stressful or traumatic for victims/survivors. Effective reporting mechanisms should not place the burden of generating action on the reporter, but provide support, and assure that appropriate action is taken.

Even where there are systems in place to facilitate reporting, they are not always trusted. Clear information on reporting channels is one action that should be highlighted in order to support greater trust in the system and to encourage victims/survivors to come forward. However, information is only a starting point for motivating greater trust, which is linked to broader questions of organisational culture

It is important to take into consideration what the perceived and real risks are to the victim/survivor. Victims/survivors, or those who report, may perceive that the costs of reporting outweigh the possible benefits. An additional reason for under-reporting relates to local context and the fear of being stigmatised and or subject to reprisals by their families and communities and/or fear of retaliation by the perpetrator. The "best" or more effective system is often the one that is easily understood, contextually appropriate, and accessible and therefore most likely to be used. Working with the communities to develop the reporting options can help support the development of effective systems, and also contributes to encouraging reporting when SEAH does happen.

Particular groups of people or victim/survivors may suffer marginalization caused by social stigma, including against disability or other intersectional inequalities. This can serve as a barrier to come forward or use complaints mechanisms; and communications, awareness raising, and other tools should consider targeting these groups to support facilitating access for marginalised groups or those groups in vulnerable situations[28]. Particular considerations and additional resources regarding victim/survivors facing intersecting inequalities, or in situations of vulnerability, are also included in pillar 2.

Table 3.1. Risks and Considerations in use of complaints mechanisms

Risk	Tips
Victim/survivor is conflicted or unaware of what qualifies as SEAH	Acts of SEAH are often embedded within complex webs of social relationships, leaving victims unsure about whether their experiences fit the legal definitions of harassment, abuse, or exploitation, or feeling conflicted about whether to report their perpetrator.
Victims/survivors cannot access mechanisms (due to physical location or modality)	Physical security and safety: it is important to have context-specific mechanisms in discreet, but easy-to-access locations. Factors such as the geographical location should be taken into consideration (victims/survivors may not be able to physically travel to a location due to it being too far away or inaccessible due to lack of access to transport). The functioning of systems may also be impacted due to certain environmental factors, such as there may be higher risk to the safety of victim/survivors in rural zones, or within conflict contexts. Victim/survivors may also be unable to access reporting mechanisms e.g., if it is located inside an implementer's office (which they cannot or are reluctant to approach), or if they are limited by resource implications, i.e., using the mechanism requires access to the internet or a phone, and this is unavailable to them.
Victim/survivors face challenges to effectively communicate and receive little information on the advancement of a complaint	It is important to have context-specific mechanisms provided in local languages. Literacy can also be a barrier. Significant delays in sharing information, updates, and progress with those who reported can lead to lack of trust in the systems. It is important to have consistent predictability of investigations with a clear overview on the process. This is difficult when multiple actors are involved, and the same approach is not used or understood (and can be complicated further by the involvement of a partner government and/or the relationship of the perpetrator to the victim/survivor). One approach to work against significant delays is for an organisation to set guidelines as to the expected timeline.

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[28] Additional resource: Edge Effect https://www.edgeeffect.org/wp-content/uploads/2020/08/Out-of-the-Margins_Full-Report_June-2020_FINAL.pdf

Risk	Tips
Victims/survivors face retaliation if they report	Many victims/survivors do not report in fear of a stigmatization, punishment, or retaliation. This can be in the form of physical, social, and/or legal ramifications: National legal frameworks, and societal norms and values, can support contexts that present challenges to reporting. For example, for victim/ survivors residing in a country where sex outside marriage is punishable by law, or when the risk of losing custody of their children is a likely outcome, may be discouraged to come forward. Special considerations for groups of victim/survivors, including those facing intersecting inequalities Pillar 2 – Develop or support survivor- and victim-centred response and support mechanisms, may face especially significant risks and likelihood of retaliation. Further physical harm could arise from the perpetrator, family, or community retaliation. Retaliation can also be in the form of punishment by managers or leadership, firing the victim/survivor from their position, or blocking career progression or removing opportunities for the person who reports. Retaliation can also result from weak confidentiality safeguards, or compromised reporting systems, including fundamental data protection procedures. It is important to put in place supporting policies, such as protection from retaliation. The elements of effective anti-retaliation policies require further research and examples.
Victims/survivors see no benefit to reporting	Victims/survivors may be aware of historically poor responses to reporting. They see that even when others report, there were little to no consequences for the perpetrator, the process took far too long or was not managed properly, and the enabling environment for abuse was not changed. This indicates that accountability mechanisms are not being implemented effectively or systematically; or there may be a lack of accountability mechanism all together. Victims/survivors may not be aware of possible assistance, or they may already be aware that assistance is not available, and so are discouraged from reporting. In many areas, sufficient services are unavailable [*see chapter 2*]; SEAH victims are often referred to get help where programmes are already underfunded, and do not reach all segments of communities.

Box 3.1. Protecting the victims/survivors: Canada's (anti-)retaliation procedures

The Public Service Disclosure Protection Act (PSDPA) is whistle-blower legislation available to all Federal public servants, with authority to accept disclosures under this instrument in place at Global Affairs Canada.

This legislation lays out the following protections:

- The disclosure process is **confidential** so the identity of the reporting person is protected in accordance with the Act.

- The legislation includes the requirement to ensure that **retaliatory measures** are not taken against an individual who has made a protected disclosure or who has participated in an investigation into alleged wrongdoing.

- Anyone that is experiencing an act of reprisal can make a complaint to the **Public Sector Integrity Commissioner** within 60 days, for referral to an external, quasi-judicial body, the Public Sector Integrity Tribunal.

- This referral or complaint can lead to a **settlement** or **corrective action** ordered by a special tribunal, such as compensation or disciplinary action against the guilty parties. Authorities to protect individuals from reprisal also includes changing their work or removing individuals out of a specific work place to prevent reprisal from occurring.

- The Senior Officer for Internal Disclosure and the Deputy Head must take measures to prevent or stop reprisals from occurring.

Source: Government of Canada (2008[61]), Public Service Disclosure Protection Act (PSDPA), https://www.canada.ca/en/treasury-board-secretariat/services/values-ethics/disclosure-protection/overview-public-servants-disclosure-protection-act.html

Actions to encourage reporting

Organisational culture can discourage reporting (both internally vis-à-vis its own staff, and in ways in which it operates with outside partners and community members). It is important to recognise and address the institutional factors (both internally and externally) that contribute to this.

The burden of reporting and proof should not be placed solely on the victim. Instead, it is important that local, national, and international actors create an environment that ensures confidentiality, encourages family, community members, and bystander support, and generates action to support victims/survivors. Reporting systems should aim to remove uncertainty for reporters. When a victim comes forward, it is important that they receive protection, are accompanied throughout the process, remain informed throughout, and feel respected from those responsible for the processes.

In addition to limiting the risks around complaints mechanisms and understanding the barriers to the use of reporting mechanisms Table 3.1, organisations can consider other actions to encourage victims/survivors to report. For example:

- Ensure that the community, all local stakeholders, and partners clearly understand that aid is never given on condition of an exchange for sex and encourage reporting of any such instances.
- Make sure staff and community members know what SEAH is, that organisations are required to prevent such acts from occurring, and are accountable if and when an incident takes place. Staff and community members know where and how to report an incident.
- Share general case statistics (with respect to privacy and confidentiality), as well as the outcome of investigations, to reinforce transparency and accountability to affected populations.

However, it is also important for those beyond victim/survivors are empowered as well. Organisational culture supported by outspoken leadership, along with effective policies.

Table 3.2. Checklist for markers of organisational culture that encourages reporting by bystanders, and has a productive "speak up" or whistleblowing culture

The CHS Alliance conducted research, interviews, and exchanges with a number of organisations to establish a list of actions to encourage reporting, and demonstrate what elements characterise a support whistleblowing culture.

A culture that encourages all staff to speak up and protects them when they do (i.e., does not allow retaliation) requires:

Category	Actions
Essential principles	✓ protecting those who report and speak up; ✓ being accountable when wrongdoing occurs;
Institutional framework and safeguards	✓ having a strong and living code of conduct that reflects the organisation's values; ✓ developing a whistleblowing policy and other procedures and practices that influence ethical conduct; ✓ protected reporting mechanisms and prevention of retaliation in the organisation's internal controls, ethics, and compliance systems; ✓ ensuring reporting tools are readily available and easy to use; ✓ providing multiple types of channels to report; ✓ a secure system that can offer anonymity to the reporter; ✓ regularly updating the reporter on the progress of the case;
Scope and implementation	✓ promoting greater implementation of whistleblowing protection provisions throughout the organisation and involving a cross section of staff to test the policy's implementation before implementing widely across the organisation; ✓ ensuring the whistleblowing policy scope is as broad as possible and protects all who carry out functions or activities related to the organisation's mandate;

Category	Actions
Messaging and communications	✓ clearly communicating the processes in place (reporting channels and procedures to facilitate disclosure) through promotion, regular awareness raising and training (including policy training); ✓ clear messages from senior level management/leadership that set the tone by "leading by example" and acting as positive role models; ✓ removing the negative connotation and social stigma associated with whistleblowing by considering using different terms such as, "reporters of wrongdoing" or "reporters of misconduct";
Monitoring and evaluation	✓ regularly reviewing, monitoring, and evaluating the whistleblowing policy

Source: CHS Alliance (2022[11]), Whistleblower protection report – how to create a safe speak up culture.

Key elements of a reporting mechanism

As per the DAC Recommendation, organisational reporting and response systems and procedures for the prevention of SEA and SH should include:

> *a. Internal complaint and investigation procedures that are context-specific and survivor- and victim-centred, and that include established functions and mechanisms to handle incidents and allegations for donors and implementing partners. Adherents should explore independent mechanisms as appropriate, noting that alleged perpetrators also have privacy rights.*
>
> *b. Easy, safe, accessible, context-sensitive, culturally appropriate reporting and complaint mechanisms that are confidential and anonymous through which affected individuals and communities can report incidents, and which are coordinated to ensure consistency in response efforts. These could include independent whistleblowing mechanisms available to staff, partners, aid recipients, and their families and communities, as well as other stakeholders, involving local and national governments where safe and appropriate, and in accordance with their national legal and institutional frameworks.*
>
> *c. Protection from retaliation for those affected or who report, including whistle-blowers, by having a policy for protection from retaliation in place.*

Mechanisms should be accessible, but confidential, in order to enable anyone who experiences, witnesses, or learns about an act of SEAH by staff, partners, volunteers or any of those involved in the management or provision of aid to make a complaint.

The existence and functioning of the mechanism should also be widely communicated. Information should be provided (in local languages, and child-friendly and disability appropriate formats) to the community and all local stakeholders on the complaint handling process, how it works, who is responsible, what happens when a complaint is made, how confidentiality is maintained, what the purpose of the complaints mechanism is, and any limitations in terms of scope or process.

Efforts should be made to take a victim/survivor-centred approach to complaints mechanisms.

Table 3.3. Self-assessment of a good complaints/reporting mechanism

Guiding Principle	Question	Considerations
Adopt a system-wide approach	Are complaints mechanisms coordinated at headquarters and mission level? Are existing and informal mechanisms taken into account?	✓ Reporting pathways are embedded in all sectors and processes exist for staff and beneficiaries alike ✓ Reporting mechanisms are connected to existing referral structures, such as health services, social services, and gender-based violence response systems ✓ Reporting mechanisms are connected to community engagement processes, with awareness that some reports are likely to be made through community structures

Guiding Principle	Question	Considerations
Adapt to local context	Are there any community-based and/or informal mechanisms in place? Are relevant actors at the community level involved?	✓ Local actors, including those who are trusted in the community, are included in the development and operation of reporting process ✓ Informal reporting systems are taken into account (and not discounted due to their informal nature)
Provide multiple methods of access	Does the report mechanism include multiple channels for individuals to report SEAH? Are they easily accessible and readily available?	✓ Multiple languages ✓ Options for non-written complainants ✓ Consideration of possible disabilities, such as visual or hearing impaired ✓ Clear guidelines for receiving complaints related to SEA against children, including how when, and to whom referrals should be made ✓ Multiple modalities: complaint boxes, anonymous web forms, helplines, and dedicated email addresses. ✓ Multiple physical locations are possible, and geographic constraints/risks are taken into consideration
Remove uncertainty	Are follow-up processes clear for the complainant? Are timelines respected?	✓ Process and steps are explained, including how reports and information provided will be used in the future ✓ Timeline is clear and respected (guidelines in place to ensure delays are not excessive)
Provide confidential or anonymous reporting	Are there safe channels for programme actors to report? Is anonymous reporting available? Is it clear that bystanders can make reports too?	✓ Anonymous reporting is available and respected ✓ Multiple channels are available: including possibility to report through a manager or human resources ✓ Bystanders can report and whistleblowing protections are well known
Provide protection and use secure technology	Does the process provide adequate safeguards and protect the reporter?	✓ Privacy is respected ✓ Data protection protocols are in place and respected (including on data sharing) ✓ Physical safety and protection are provided

Box 3.2. Ensuring confidentiality and anonymity of reporting mechanisms

There are many ways that countries and other actors have taken actions to help ensure confidentiality in reporting and complaints processes. For example, countries have put in place different mechanisms to reinforce this:

- Multiple methods of reporting, where victim/survivor is not asked to report their identity
  - Australia has different methods in place: a phone hotline, online form a victim/survivor can submit, etc.
  - New Zealand do not require the victim to disclose their identity at any time.
  - Canada has established a dedicated mailbox to receive confidential SEA reports from partners.
  - Switzerland is developing a secure inbox that will allow victims to communicate directly with the Compliance Office while protecting their anonymity.
- Restricted access to information, including exceptions in national legislation
  - Canada's reporting requirements excludes personal identifying information in order to preserve confidentiality.
- Legal protections for confidentiality
  - Italy's code of conduct includes a detailed section on procedures (article 5) giving a clear framework for reporting mechanisms and legal protections for the victims.

Localising mechanisms

Mechanisms are only effective if they are fit for purpose and adapted to the specific local context. Various forms of reporting mechanisms should be considered, taking into account the environment within which they operate.

Involving community is key to improving understanding of their needs, in particular consulting more marginalised groups and those least likely to come forward, as well as the need to understand how other organisations and implementing partners are working in the community.

Consider including local groups or local leaders (where appropriate and where local leaders prioritise the best interest of the community and victims/survivors) from the outset in developing or adjusting complaints mechanisms. This can help better respond to local contexts, build trust, and encourage more reporting. Senior Victims' Rights Officers and community-based complaint networks play important roles, and can help connect to these local groups/leaders.

Co-ordination

Co-ordinating among relevant actors remains challenging. In some instances, even when allegations are brought forward, there are insufficient frameworks in place to join up necessary action among relevant institutions (including international organisations, governments, etc.) responsible for joint projects or programmes. There is a need to develop better systems to receive complaints and coordinate action and responses.

Co-ordination among actors also has implications for human resources policies and practices (e.g., to avoid the rehiring of perpetrators and preventing them from moving through other international entities undetected).

It is important to consider co-ordination with local and national governments when responding to allegations. However, organisations need to apply the "do no harm principle" when reporting criminal acts to national services. For example, in countries where rape is considered adultery, where "honour" crimes are tolerated or where homosexuality incurs physical punishment (including capital punishment).

National accountability systems can also provide opportunities for coordination on referral and complaints mechanisms.

Effective co-ordination requires clear communication about different mechanisms, reporting requirements, and responsibilities of each actor in relation to SEAH cases. Bilateral and multilateral donors take a variety of approaches on requirements for reporting and response. These requirements can be linked to other criteria included in partnership arrangements. It is important that development partners:

- establish and effectively communicate their reporting mechanisms;
- are clear about reporting requirements (e.g., donors' requirements for implementing partners); and
- have established investigation procedures whether in-house or supported through external mechanisms.

Box 3.3. Community-based complaints mechanisms: a model for inter-agency coordination

A Community-based complaints mechanism (CBCM) is a system blending both formal and informal community structures, built on engagement with the community where individuals are able and encouraged to safely report grievances – including SEA incidents – and those reports are referred to the appropriate entities for follow-up. It is rooted in community input so that the structure is both culturally and gender-sensitive, maximizing its safety and effectiveness.

An inter-agency CBCM entails that the mechanism can receive complaints against actors from multiple organisations, and that the complaints will be referred to the proper unit within each organisation for follow-up. Advantages of this kind of system include:

- If properly implemented, the CBCM can increase awareness of SEA in both the affected population and humanitarian staff, including how to report SEA incidents.
- One joint mechanism is easier for communities to understand and to safely access. It offers the beneficiary complainant (or even a staff complainant) the option of reporting SEA to an agency which does not itself employ the alleged perpetrator of the misconduct, reducing fear of reprisal.
- The referral system also ensures that the complaint will arrive at the appropriate agency when a beneficiary cannot or does not distinguish which agency employs the offending staff member.

The Best Practice Guide on IASC CBCMs builds on projects carried out to pilot inter-agency CBCMs in the Democratic Republic of Congo, and in Ethiopia; it also pulled from lessons contained in evaluations in Thailand, Haiti, Kenya, and by CARE. Although these mechanisms were developed in humanitarian contexts, they can also be applicable to transition and development contexts.

Source: IASC (2016[58]), Best Practice Guide : Inter-Agency Community-Based Complaints Mechanisms.

Modalities: receiving a complaint and case management

Once a complaints mechanism is established, institutions actors report that it can be challenging to determine procedures for different kinds of cases, including distinguishing SE, SA, and SH and other kinds of misconduct. In some cases, organisations handle SEAH reports and allegation through the same mechanism as other misconduct, such as bullying, harassment, fraud, and corruption. Organisations with enough capacity and expertise have established triage systems to separate cases and determine next steps.

Protocols around receiving and handling complaints should be respected. This includes established practice in the field, such as IASC Guidelines. Specific guidelines should also be used around (1) In-person complaints vs others; (2) anonymous complaints; and (3) child complaints.

Organisations have taken a variety of approaches to case management (whether using internal or independent procedures). Case management requires specific technical expertise, and can only be conducted by case managers or case workers with the correct skill set.

Complaints systems should be linked to victim/survivor support and assistance Pillar 2 – Develop or support survivor- and victim-centred response and support mechanisms. Victim/survivor support is not contingent on whether the victim/survivor participates in the investigation of the complaint, an investigation is undertaken; or allegations of the complainant are substantiated. All victims/survivors should be given

the opportunity to receive comprehensive services. Complaints mechanisms should be connected to other relevant stakeholders and those responsible for providing services, and service referral pathways. IASC provides examples of how a complaint is received in the context of a community-based complaints mechanism, with an established PSEA coordinator (IASC, 2016[58]).

Monitoring complaints mechanisms

The active monitoring and evaluating of systems should be conducted on a rolling basis. It is critical to ensure that channels are functioning correctly and response to the complaint is effective.

First and foremost, reports of SEAH indicate that harm and suffering are being perpetrated. They also indicate that there are significant individual and collective failings that need to be addressed within institutions, and within the environment within which they operate.

At the same time, reports and complaints should be taken as avenues to improve an organisation's systems, as they demonstrate failings and gaps in protection. Complaints provide insight into the realities of the organisational culture, and within its implementing environment; they also present an opportunity to improve relationships with stakeholders, and test assumptions about community needs[29]; and to assess the existence and efficacy of services provision at different levels.

When programmes end or when monitoring the functioning of a complaints mechanism, it is important to provide space for questions as to why people may have reported or not. Monitoring and evaluation mechanisms should be integrated into all aspects of SEAH frameworks, including reporting mechanisms.

One modality for review and updating mechanisms is through feedback. Affected communities (whether that be staff within an institution) or those communities in humanitarian or development contexts, as well as victims/survivors, may be offered the opportunity to provide feedback, on a voluntary basis. If they are willing to participate in such an exercise, enquiring as to whether victims/survivors felt safe, respected, and comfortable reporting through existing channels, and other reflections around their experience, can provide useful input for the improvement of reporting mechanisms. The feedback loop to those who report can be crucial, especially regarding zero tolerance for inaction. If there is no feedback loop in place to assess how an institution responds when receiving a complaint, people may not trust the systems in the future.

Broader community feedback is also an important tool in monitoring and improving mechanisms; collecting the experiences and opinions of beneficiaries can support efforts to ensure that the systems in place are working. It may also be useful to work together with governmental and local partners, to provide the option for multi-pronged feedback systems incorporating different channels, such as SMS options, email channels, and/or direct in person contact channels. Other options to gather feedback can also be explored: national and local surveys can be a helpful way to collect information about preferred systems for feedback and reporting complaints.

Providing feedback has confidentiality implications and institutions must take necessary precautions when sharing information regarding those who reported (anonymously or not) and the implicated communities more broadly.

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[29] SEAH Investigation Guide, (CHS Alliance, 2022[31]) : A guide for humanitarian organisations on receiving and investigating allegations of abuse, exploitation, fraud or corruption by their own staff.

> **Box 3.4. An example of information flow - Switzerland's reporting mechanism**
>
> **The flow of information in Switzerland's reporting mechanism**
>
> The Swiss Agency for Development and Cooperation (SDC) developed specific reporting mechanisms for both internal and external cases.
>
> For the external mechanism, the Compliance Office, with the collaboration of SDC's PSEAH Focal Point, manages SEAH cases from partnering organizations. Contracting partners are primarily responsible for investigating allegations of SEAH, but the Compliance Office will ensure that they have taken steps to protect the alleged victim and have set up an independent investigation. The Compliance Office monitors the progress of the partner's proposed actions and may recommend suspension of funds or termination of contractual relations if there are doubts about the quality of the investigation or the organization's ability to handle the results.
>
> Internal mechanisms are divided in two possibilities accordingly to the wishes of the victim. The Compliance Office will be able to receive and hear alleged victims in a strictly confidential and secure setting. Depending on the specific situation, the Compliance will discuss the various options available; informal approach or formal complaint, with the alleged victim, whose consent is needed for any further steps. As a rule, formal investigations will be trusted to external investigators.
>
> Source: Swiss Agency for Development and Cooperation (2020[62])

Investigations

As per the DAC Recommendation[30]:

> *3e. Strengthened transparent reporting and investigation mechanisms and procedures to ensure internal and external accountability, support prevention, and improve access to information, taking into consideration the safety, wants, needs, and rights of survivors and victims with regard to information-sharing, confidentiality, consent, and risk assessment, for the protection of the survivor and victim and with the aim of preventing future incidents.*

Investigations into SEAH allegations are important for accountability of the perpetrator and to the victim/survivor, taking into account their safety and rights. Investigations are also an essential accountability mechanism of the organisation in improving SEAH prevention and response management, with a view to preventing future incidents and responding appropriately.

Investigations by organisations are often administrative, with consequences for perpetrators restricted to organisational misconduct procedures. However, if criminal wrong-doing is suspected, the organisation may refer the matter to the appropriate legal system for criminal investigation and prosecution. SEA against a child will almost always be criminal for most countries, within national contexts around age of consent and child marriage practices. SEAH against adults will depend on national legal frameworks that govern GBV. Criminal referrals should always be subject to "do no further harm" tests and legal framework analysis, as well as legal requirements in the perpetrator's country where non-nationals are concerned.

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[30] 3d. Support for local capacity, rule of law, access to justice, and increased accountability, through development co-operation and humanitarian assistance, depending on the local context. See Pillar 2.

The context within which investigations occur can vary greatly, and each investigation is unique (with a variety of time and resources required for each phase of each investigation). However, regardless of the kind of investigation undertaken, it is important to have a clear overview of the role of investigations and investigators to ensure they employ victim/survivor-centred approaches.[31] Taking into account victim/survivor support in these processes is also addressed.

Table 3.4. Good practice: Guiding principles for SEAH investigations

Several actors have developed guidance around SEAH Investigations, providing a set of principles:

Foundational Element	Description
Roles and Responsibilities	SEAH Investigations must have clearly defined roles and responsibilities. Investigations can be conducted by competent external parties or internally if there are qualified staff available.
Standards of proof in administrative investigations	Investigation standards of proof can vary depending on organisational requirements. In most SEAH investigations, because they are administrative, complaints must be provided on the balance of probabilities standard, i.e., it must simply be more probable than not that the misconduct occurred. Others may require a higher "clear and convincing evidence" standard.
Victim/Survivor-centred	SEAH Investigations should integrate a victim/survivor-centred approach. This includes respect for the principles of do no harm; and guaranteeing safety; confidentiality; respect; and non-discrimination.
Transparent and Fair	The principles of due process, impartiality, and fact-based decision-making should be respected. All investigations must be conducted in a way that maintains the rights of all stakeholders involved. Investigations must always be transparent, objective, and fair.
Professional	Investigations should follow established guidelines and practices. They should also be: timely (conducted as soon as possible after the complaint is received; coordinated (investigation team must coordinate with appropriate specialists, experts, and other organisations if they are implicated in the particular case etc.); and qualified (the investigation team members should be appropriately trained and experienced in conducted SEAH investigations).
Structured	Investigations should be thorough, conducted in a diligent, complete, focused, and rigorous manner to ensure that all relevant evidence is obtained and evaluated. They should also be process-oriented, and appropriately documented.

Source: CHS Alliance (2022[31]), SEAH Investigation Guide.

Responsibility and capacity for investigations

The approach to SEAH investigations varies. Some bilateral and multilateral donors do not investigate SEAH cases directly, and the responsibility falls on implementing partners and partner organisations, who then are required to report to the relevant donor. Donors often allocate responsibility for investigations to implementing partners, as they have direct control over their own staff and direct accountability to beneficiaries in aid delivery processes.

In some cases, for example if the implementing partner is a small civil society organisation (CSO), the donor provides a level of support, accompanying them in the process (such as by direct donor involvement; support for independent consultant investigators; or training and capacity building for the organisation). Consultancy agreements with other organisations to cover certain investigations is also current practice.

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[31] For further information or examples of guidance on investigations that are victim/survivor-centred, the UN Chief Executive Board produced a Manual on investigations of sexual harassment complaints, which provides guidance that is applicable to many institutional contexts. Objectives of this manual include to reduce the burden for victims/survivors, and produce more consistent, effective and efficient investigations. Investigators' Manual - Investigation of Sexual Harassment Complaints | United Nations - CEB (unsceb.org)

In some instances, funds may also be available to support this specific capacity, such as the OCHA Fund for investigations into sexual exploitation, abuse, and sexual harassment.

It is important to note that not all organisations have their own internal investigation capacity and may rely on external experts or contractors to provide investigation support. Depending on requirements and capacity, different actors have varied levels of responsibility in relation to undertaking investigations. Where dedicated SEAH investigator capacity does not exist, some organisations have relied on fraud and corruption investigators to cover SEAH, whereas sexual harassment may more often be investigated by internal human resource teams. External investigators may be more practical in some cases, depending on the specifics of complaints and the increased risk of sharing private information in some circumstances.

Developing capacity of investigators specific to SEAH is an evolving field. All investigators, be they internal or external, can build up their capacity (as the field is quickly evolving, and some organisations may rely on existing investigators that need additional training). In some instances, investigators benefit from undertaking capacity-building such as the CHS Alliance SEAH investigations for managers and staff training scheme and the UNHCR e-learning on SEA investigations CHS training on SEAH investigations for managers and staff.

Box 3.5. Lessons around accountability and victim/survivor support in investigations and related legal processes

It is important to take a **victim/survivor-centred approach** to all activities relating to SEAH prevention and response, including administrative and criminal investigations. Lessons can be learned from long-standing standards for gender-based violence (GBV) minimum service provisions, and guidelines produced around victim/survivor assistance and care, including the **Core Standards for Survivor-Centred Support of Sexual Exploitation, Abuse, and Harassment.**

These Core Standards set out to ensure that all survivors of SEAH are entitled to adequate support services, regardless of which organisation employed the person who caused the harm. They necessitate that the victim/survivor is the driving force behind all decisions and actions taken regarding support services, including when actions are taken, and the types of support services to be provided.

This tool provides international development and humanitarian organisations with a set of standards related to **safety, medical care, psychosocial support (PSS), accountability, and long-term recovery** for victims/survivors of SEAH.

Core Standard: Accountability

Under the Core Standard provision on Accountability, guidance is set out on the processes around investigations, criminal justice systems, and administrative accountability measures:

As the criminal justice system can cause further harm, it is an adult victim/survivor's decision about whether to choose this route. If the survivor is a child, a criminal offense must be reported to the authorities in most countries. If the case does not go to the criminal justice system, there is a need to have a robust internal administrative accountability measures in place within an organisation. Administrative investigations are a requirement because an organisation has a responsibility to prevent further harm to individuals.

1. *If an organisation does not have the capacity to conduct such an investigation themselves, they must ask for support from their donors, primary grant holder, or others to provide such support.*

2. *Administrative investigations must never seek a level of proof higher than 'on the balance of probability' unless legally required to do so. Where local legal frameworks for administrative action*

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prevent appropriate disciplinary actions, a 'not eligible for hire' or similar designation should be noticed in the employee file. This is aligned with emerging standards and good practices for the sector, including those outline in the Misconduct Disclosure Scheme.

3. *Where the survivor feels that it is safe and will not cause further harm, the organisation is required to facilitate access to local criminal or civil courts. This should at a minimum include, with a survivor's informed consent and input, facilitating local legal advice in a language understood by the survivor, and appointing an individual who is appropriately trained and experienced accompany the survivor to meetings and court dates if this is desired by the survivor. The organisation must cover the transport costs to and from meetings with legal advisors and court dates.*

4. *It is strongly recommended that organisations liaise with and seek advice from local legal aid or justice-oriented organisations where they operate. It is further recommended that organisations develop relationships with local embassies who often can provide limited legal advice or advice on vetted local lawyers.*

5. *Where requested, organisations must comply with requests from local judiciary to provide evidence about the current location of the accused. This includes information to facilitate paternity and child support cases brought forward by the survivor.*

6. *A criminal investigation takes precedence over an administrative investigation. However, there are some circumstances where it might be appropriate to undertake a parallel investigation, such as when considering the length of time it might take for the criminal investigation to conclude.*

Cross-sector expertise

The Core Standards were developed by InterAction and a group of small, medium, and large organisations; humanitarian and development organisations; and faith-based and secular organisations. The Core Standards were reviewed by numerous other organisations and reflect feedback from a wide range of stakeholders.

Source: InterAction (2023[63]) Core Standards for Survivor-Centered Support of Sexual Exploitation, Abuse, and Harassment, https://www.interaction.org/wp-content/uploads/2023/02/Core-Standards-for-Survivor-Centered-Support-of-SEAH.pdf.

Employment accountability

As per the DAC Recommendation:

> *3f. Policies and processes to ensure both mechanisms and management responsibilities to ensure accountability for staff when necessary, including dismissal, suspension, and other administrative measures. At the same time, positive incentives to promote good practice and rewards for learning and improvement should be used to foster a culture of inclusion, trust, and openness to enable accountability and transparency.*
>
> *3g. Clearly communicated mechanisms to tackle impunity, and penalties for staff violations of codes of conduct.*
>
> *3h. Effective and transparent recruitment, performance management, and referral practices to prevent the hiring (e.g., re-hiring, transfer, or promotion) of perpetrators, including improved mechanisms for screening candidates' backgrounds, references, and criminal records checks for former misconduct.*

Governments and organisations should consider the implications for human resources, legal, and related policies in their institutional frameworks to respond to and prevent SEAH.

The role of human resources and preventing SEAH

Strong institutional mechanisms to prevent and respond to SEAH include ethical instruments and codes of conduct; including definitions of harmful behaviour, and the implications if the codes of conduct are breached. These should also be accompanied by mechanisms and clearly defined management responsibilities to ensure that when necessary, dismissal, suspension, other administrative measures are taken.

SEAH occurs when impunity persists within institutions, with partners, and in the environments within which they operate. Consistently implementing human resources policies and having clearly defined legal regimes are key elements to ensure accountability of perpetrators, and contribute to stronger SEAH prevention efforts.

Perpetrators are able to circulate in the development, humanitarian, and other sectors, due to a number of facilitating factors: a lack of good detection mechanisms, effective reporting, and missing communication between organisations. To counteract the hiring, re-hiring, or promotion of perpetrators, it is important that institutions put in place improved mechanisms for screening candidates' backgrounds, references, and criminal records checks for former misconduct.

Sharing information between organisations has a number of challenging implications, including legal considerations (different national jurisdictions and legal frameworks), and data protection and privacy regulations. Co-operation between institutions has increased, including through initiatives such as the Project Soteria and Misconduct Disclosure Scheme Box 3.6

These considerations should also be accompanied by capacity building measures. Donors (bilateral and multilateral) should also take into account that providing resources or funding for capacity building is important, as building capacity amongst organisations, particularly small or new ones, strengthens protections across the entire sector for staff, victims/survivors, and community members.

Table 3.5. Steps to reduce the risk of SEAH and stop the cycling of SEAH perpetrators around the employment cycle

Human resources offices and experts are involved throughout the entire employment cycle and represent key opportunities for accountability measures. Legal regimes provide the framework for organizations to address employment accountability.

Employment cycle phase	Key consideration
Job postings	✓ Job position descriptions should reflect the importance of addressing and preventing SEAH within the organisation and the standards of conduct required of its staff. ✓ An interdepartmental approach to human resources to ensure a comprehensive system for prevention and response to incidents.
Recruitment and Hiring	✓ Self-certification, interview and referencing questions to determine any past history of misconduct for further consideration. ✓ The provision of complete references for former staff. ✓ Include a check of police register as part of the background check in the recruiting process. ✓ Consider the integration of information-sharing and/or coordinating systems with other organisations, such as the Misconduct Disclosure Scheme or the Project Soteria (Box 3.6). ✓ Ensure the recruitment/hiring process involves a personal discussion about the Code of Conduct/standards and the consequences of breaches by human resources or the manager/supervisor of the new employee. This should include the responsibility of all employees to speak up about wrong-doing and of all managers to respond to concerns raised.
Performance management	✓ Performance appraisal processes that include measures to hold staff accountability for safeguarding and safe workplace environments. ✓ Include a requirement for management and leadership around supporting organisational efforts to prevent SEAH ✓ Include a requirement for regular (required) trainings ✓ Annual verification of organisational standards by each employee, including, for example, signing and dating each page of a code of conduct affirmation.
Monitoring and evaluation	✓ Regular review of employment and human resource decisions; and monitoring of implementation of human resources policies and respect for codes of conduct. ✓ Trend analyses used as a benchmark for staff and leadership to identify and respond to vulnerabilities and areas of improvement.
Resource allocation and capacity building	✓ Allocation of adequate funding and resources to support human resources departments. ✓ For donors, consideration of the budgetary and resource implications of effective human resources policies and practices to prevent SEAH, when development partnership and co-operation agreements. ✓ For donors, investments in the capacity building of implementing partners and other partner organizations, in order to support the development and institutionalization of better practices on preventing SEAH.
Legal framework	**Key Considerations**
Legal considerations within an organisation's institutional framework	✓ Include rules/regulations on data protection, privacy and labour laws, and due process rights. ✓ Develop a data sharing and privacy plan that outlines privacy protections and procedures for transparency. ✓ Ensure international human rights standards and international standards on SEAH, are included in institutional frameworks and are always respected.
If an allegation of SEAH occurs	✓ Ensure international human rights standards and best practices are observed in relation to all affected individuals. Consider the rights of all parties including the alleged victim/survivor, alleged perpetrator, witnesses, and whistle-blowers. ✓ Preparation before a case occurs, including an analysis and framework in place to react in a timely manner and appropriately. Understanding applicable legal frameworks, including in different jurisdictions, is critical. Incidents will occur in jurisdictions with differing levels of individual protections for labour standards, data protection, human rights etc. ✓ Integrate a victim/survivor-centred approaches when considering the legal responsibilities to address cases and the liability involved in the failure to respond to cases.

Note: This list is developed in part drawing on learnings in a Community of Practice on Employment Accountability, brought together by USAID, in co-operation with the Netherlands, composed of academics, donors, non-governmental organizations (NGOs), aid practitioners, and related organizations. This Community of Practice produced the Employment Accountability Roadmap, is a guide for the international development and humanitarian assistance sector to address sexual exploitation, abuse and harassment throughout the employment cycle. It draws on the experiences and best practices in the aid sector to identify proven models, common challenges and areas for continued learning.

Box 3.6. International coordination efforts to stop perpetrators from circulating through different organisations

Misconduct Disclosure Scheme

The Misconduct Disclosure Scheme facilitates the sharing of misconduct data between employers, and is implemented by over 170 organisations. The Scheme complements other vetting processes, such as police checks, as it picks up perpetrators who have had disciplinary processes completed against them, or who are subject to ongoing investigation, but who may not have committed crimes or been investigated by the police. The Scheme aims to both improve current referencing practices, and build confidence that requesting data related to sexual misconduct is possible both practically and legally.

Organisations who are part of the Scheme commit to systematically checking with previous employers about any SEAH issues relating to potential new hires; and a commitment to respond systematically to such checks from others. The Scheme holds no information on specific cases of abuse but rather, it facilitates the systematic bilateral sharing of misconduct data between recruiting organisations and previous employers.

The Scheme aims to contribute to better outcomes in coordination around employment accountability and safer environments. The goals include to facilitate coordination, contributing to: shared information results in better hiring decisions; better hiring decisions reduces hiring of abusers, and by extension, exploitation and abuse.

Project Soteria

Interpol (International Criminal Police Organization)'s Project Soteria has brought together a cross-sector partnership of law enforcement and organisations (of various sizes) to focus on preventing perpetrators of SEAH from working in the aid sector.

The project's objectives include to:

- Strengthen the capacity of law enforcement to investigate reports of SEAH in the aid sector, maintain and manage criminal records and increase awareness of SEAH in general.
- Leverage the full range of INTERPOL's global policing capabilities – from INTERPOL notices to a dedicated crime analysis file – towards increased understanding and prevention of cases of SEAH committed by aid sector personnel.
- Collaborate with the aid sector to prevent and detect cases of SEAH by facilitating information exchange and enhancing recruitment mechanisms that both detect past offenders and deter potential offenders.

A number of activities are included. For example, workshops to train child protection and sexual or gender-based violence investigators; in-country activities, including joint law enforcement and aid sector workshops and training courses for employees, volunteers, and interns on SEAH and how to respond; a global "search and check" scheme, to enable pilot aid sector organisations to send INTERPOL information on candidates to identify individuals who could pose a threat to vulnerable children.

An advisory board of representatives from government, law enforcement, the United Nations, legal experts, the private sector, civil society and survivors of SEAH in the aid sector also informs the project.

The project is funded by the United Kingdom Foreign, Commonwealth and Development Office (FCDO), with an initial timeframe from 2021-2025.

Source: (Interpol, 2021[64]; Misconduct Disclosure Scheme, 2022[65])

Checklist on Pillar 3

DAC members can ask the following questions:

- Are reporting and complaint mechanisms confidential and anonymous; and easy, safe, and accessible? Have multiple modes of access and multiple types of mechanisms been provided?

- Are complaint and investigation procedures context-specific, including in in relevant languages and formats?

- Are local actors, including those who are trusted in the community, included in the development and operation of reporting process? Are informal mechanisms also taken into account?

- Do victim/survivors and bystanders feel safe to report harmful behaviour? Are elements of "speak up" culture supported within the institution?

- Do reporting and investigation procedures take an intersectional approach and special consideration of those in vulnerable situations? This includes women and children, as well as people most at risk of discrimination on the basis of, for example, disability, gender identity and sexual orientation, race, ethnicity, migration status, age, or religion.

- Are support mechanisms for victim/survivors connected to reporting procedures?

- Are protection measures for those who report in place, and are any retaliation policies well implemented?

- Have limiting factors been identified when understanding potential barriers to access for reporting mechanisms? Has this been undertaken both in consideration of the organisational culture within an institution, and the social, cultural, or other limiting factors within development/humanitarian contexts?

- In communications to staff, partners, and communities, and in an effort to reinforce transparency and combat impunity, is the process around complaints, including repercussions (dismissal, suspension, and other administrative measures) and timeline, clearly explained?

- Have resources been provided to support safe reporting mechanisms within government institutions? Have they been provided for co-operation with implementing partners and other actors in development and humanitarian contexts?

- Have resources been dedicated to develop SEAH investigation capacity? Whether this be within institutions, or through capacity building with implementing partners or external entities?

- Do investigations related to SEA against children have clear and specific procedures, with significant risk management and mitigation expectations?

- Do reporting and investigation processes respect data protection protocols and privacy?

- Have there been efforts to strengthen human resources to take into account the risk of SEAH and also referral practices to prevent the hiring (e.g., re-hiring, transfer, or promotion) of perpetrators?

4 Pillar 4 – Training, awareness raising and communications on SEAH prevention

Pillar 4, as per the DAC Recommendation:

a.   Effective communication to raise community awareness on SEA and SH response, including the provision of information on: applicable national laws, donor agency standards, and codes of conduct; requirements and expected behaviour of donor management, staff, and implementing partners, including the private sector; and how complaint mechanisms can be used to report violations.

b.   Regular training and capacity building for management and staff on standards, codes of conduct, mechanisms to file complaints and report misconduct, and the implications of breaching standards, including anti-retaliation policies, to ensure effective cultural change and promote a safe, confident, and mutually-respectful work environment. Training and capacity building should be linked to, or aligned with, gender equality training and capacity building. Where possible, designated focal functions for SEA and SH prevention should receive professional training.

c.   Awareness-raising activities and educational, preventative outreach efforts or programmes with implementing partners to ensure aid recipients and local populations are aware of their rights, reporting mechanisms, and available support services. Aid beneficiaries and local populations should be consulted in the design of SEA and SH response programmes, and wider programming where appropriate, to ensure their needs are met. This could include capacity building and training of established local organisations, including women's rights organisations, and in-country SEA and SH prevention networks and mechanisms. Tools and materials should be shared between headquarters, field offices, implementing partners, and local and national governments, as well as public bodies including local authorities, where safe and appropriate; in relation to gender equality and non-discrimination, to prevent and protect against SEA and SH.

Supporting staff to change culture

An organisation's culture has implications internally and externally. Governments and organisations cannot adequately tackle sexual exploitation, abuse, and harassment without transparently challenging the power dynamics within their own institutional cultures and ensuring that equality and representation are delivered at every level within their institutions.

Training to prevent and respond to SEAH

Providing training, along with useful and accurate tools, to all staff regardless of their job or expertise, is essential to building individual and organisational understanding and capacity to prevent and respond to SEAH. Effective training is an indispensable part of embedding a culture of zero tolerance for inaction.

An increasing number of training programmes exist to prevent or respond to sexual misconduct, harassment, abuse, and other forms of gender-based violence. Some previous training in the sector has been described as following a "fear-based" model, focusing on the "3 Ps" – policies, prohibitions, and procedures, and has been described as being compliance focused. These traditional means of training tended to be one-off, or self-paced courses, presentation heavy and with little to no interaction or self-reflection. Further, they have been shown to have a limited effect in changing organisational culture (EEOC, 2016[1]). There is a growing need for an updated approach that ensures that all individuals know how to make the right decisions, recognise power dynamics and their implications, and prevent and respond to situations – from the obvious to the subtle – that can lead to SEAH. Transformative change requires everyone involved to have an awareness of underlying issues such as power imbalances, gender and social inequalities and each person's own unconscious biases. This requires interactive and experiential training methodologies.

Box 4.1. Suggested points for an effective SEAH training

A SEAH policy should be accompanied by thorough training in SEAH prevention, which applies from onboarding and is repeated periodically until a person exits the organisation. Policies, political commitments, and statements of intent are not enough to eliminate SEAH, inclusive dialogue to seek solutions are vital . Staff need to understand the policies in place and take ownership of the tools at their disposal to implement agreed actions.

An overview of relevant trainings provides the following suggested points to be addressed in any SEAH-related training:

- What is sexual abuse, exploitation, harassment? What is safeguarding against SEAH and why is it important? Including specifically in the humanitarian and development sectors?
- How can prohibited conduct be recognised? How to identify suspicious behaviour? Real-life scenarios and codes of conduct can be used.
- What is the role of internationally recognised standards and agreements, such as the IASC six core principles, or the DAC Recommendation, in discouraging prohibited conduct and encouraging safeguarding?
- How do you define your organisational culture? The culture should provide an environment where people feel safe to engage, where anyone in or impacted by an organisation is empowered to report concerns when they arise.
- What is included in SEAH prevention efforts? Recognising importance of organisational-scale prevention, from recruitment to response.
- How can a greater focus be placed on inclusive communication and making communication context-sensitive? For example, in countries where illiteracy is high, flyers should make use of little text or alternatives way of communication and awareness raising might be more efficient.
- How are risk assessments defined in relation to SEAH? A range of contexts or examples of different environments should be examined.
- Why is it important to report concerns? How do you raise concerns?
- What is power? What are the different types of power? How to use power with respect?
- What does it mean to adopt a victim/survivor-centred approach? Prioritising the rights, needs and wishes of the survivor/victim.
- What are key principles of a good reporting system and how can their inclusive development be ensured? What are barriers or challenges to effective reporting channels?

- How do you manage disclosure? Response protocol and consequences for the survivor/victim, for the perpetrator, and the organisation.
- Including brainstorming sessions after each training activity to find context-specific or locally adapted solutions (bottom-up rather than top-down)

Source: Adapted from UKAid and Open University (2022[66]), Safeguarding in the International Aid Sector; SIDA (2022[67]) E-learning course on SEAH in development cooperation and humanitarian assistance, and InterAction (2019[68]), Course Materials for Preventing Sexual Exploitation and Abuse.

Table 4.1. Key questions to ask when designing SEAH training initiatives

Questions	Promising practices on training
Do staff currently know what behaviours are unacceptable, prohibited, and considered as SEAH?	Before developing training, assess staff members' knowledge and experience. This can be done through a pre-training survey, for example. Do not assume prior knowledge or understanding of how sexual exploitation, abuse, and harassment manifests. If awareness is low, start by focusing on improving recognition of these behaviours and the hidden power dynamics that drives them.
Do you have well established and effective internal reporting channels for individuals to report, along with clear complaint handling procedures?	Experience shows that reporting tends to increase after trainings are held due to increased awareness so it is particularly important for staff to know how they can do it safely. Moreover, if staff report post-training and there is no system in place to handle it properly, it can damage staff's trust in the system in the future and discourage reporting moving forward. In other words, before conducting trainings, management must have clarified reporting mechanisms and how the report is handled in a timely, professional, confidential and victim/survivor centred manner.
Do individuals in your organisation see the importance of SEAH training?	Kicking off a training with the key reasons why SEAH prevention and response is important to the audience is crucial so that staff understand how SEAH is relevant to their work. Importantly, there needs to be an interactive discussion about how power inequalities are exacerbated in humanitarian settings, as well as other reasons why SEAH should be discussed. An example of this could be aligning with the organisation's wider mission and values, learning from past incidents, the negative consequences that even one single incident has on victims/survivors, the organisation, and the wider community. Leadership must continuously communicate the importance of SEAH training, before, after, and during the training roll out so that staff understand this is an organisational priority and not just a tick the box exercises for compliance purposes.
Do staff feel they can speak openly about SEAH issues?	Within an organisation, to create internal cultural change in relation to SEAH, it is vital that staff can openly discuss SEAH issues. Discourse in relation to SEAH has traditionally been problematic as it often ignores the voice of survivors, and can employ a victim blaming rhetoric, or a perpetrator centred narrative. Organisations must become more comfortable in speaking about SEAH, examining the underlying factors and root causes, as well as hearing the reality of the victim/survivor experience and acknowledging the role the organisation has played in enabling SEAH. Training should be contextualised, particularly any case studies that are shared. It is important to consider the type of programming participants are familiar with, overall social setting, and the prevalent protection risks in that setting. Trainings also need to plan accordingly the participant make-up and how participants will feel most comfortable attending and sharing. For example, sometimes the setting requires providing gender-segregated training, or training in separate languages so that the message is effectively communicated, or separate trainings for field staff and management as having high-level leadership present can at times stifle open participation. Training should highlight the positive effects of intervening, as well as the negative impacts of unchallenged SEAH behaviours. It should also explore the messaging around SEAH, challenge stereotypes and how to be mindful of issues such as victim-blaming and avoiding re-traumatisation of victims/survivors.
Do staff know how to be an active bystander and report a situation? Do they feel empowered to do so?	Effective SEAH training should send a clear message that it is every individual's responsibility to speak up and report incidents of sexual misconduct. Training should also include information on how, when, and to whom to report. If knowledge is low, focus on discussing examples of specific bystander responses across a range of scenarios. Role playing activities can also be used and raise awareness of the support systems and reporting structures in place. This can increase individual's confidence and encourage them to act and respond. Are staff aware of the services available to them if they experience sexual misconduct? If they are unaware of support available, they are less likely to take action.

Questions	Promising practices on training
What is the preferred format of your training?	Training should be designed to be as interactive as possible, to meet the needs of different leaning styles (audio clips, videos, interactive polling, variety of speakers, group activities, case studies, etc). This has been particularly important in the transition to virtual learning due to the pandemic, and the resulting fatigue for online sessions, which requires that sessions be highly interactive to enable participants to actively engage and contribute.
How will you check the effectiveness of your trainings? How can we measure knowledge gain and retention?	Not all SEAH trainings will achieve their objective, particularly if they do not apply good practices as aforementioned. Post-test is one way to check knowledge gain immediately after the training, but organisations might also consider applying regular knowledge checks over the longer term, in addition to mentioning continuous messaging around SEAH in other forms outside of training to ensure knowledge retention, such as posters in offices and programme sites, short refresher courses and internal digital reminders via email, etc.

Box 4.2. United Kingdom Safeguarding in the International Aid Sector Training Package

The Open University, in partnership with the UK Foreign, Commonwealth and Development Office (FCDO), created three extensive safeguarding courses forming the Safeguarding in the International Aid Sector Training Package. They draw on the experience and expertise of practitioners and academics from within the humanitarian sector. These courses aim to raise the standard of knowledge and skills and equip learners for effective practice in any aid organisation, including an increased ability to understand complex safeguarding issues, devise effective policies and procedures and manage challenging implementation issues.

Each of these courses has previously been run as a Massive Open Online Course (MOOC) on the FutureLearn platform. Unlike many trainings, these are more interactive and allow learners to ask questions to deepen their learning and go further than a self-paced online course.

The training package is divided in 3 courses:

1. Introduction to safeguarding (24 hours)
2. Implementing safeguarding (24 hours)
3. Leadership in safeguarding (8 hours)

A training toolkit has also been developed to enable Safeguarding Leads to deliver safeguarding training or other forms of support for their organisation and as a resource to help those who use it to internalise, practice and deliver key safeguarding messages.

Source: UKAid & Open University (2022[66]), Safeguarding in the International Aid Sector

Box 4.3. Bond Safeguarding Leadership Tool for CEOs and Leaders

Recent failures in safeguarding in the international development and humanitarian sector have shown that organisations cannot deliver good safeguarding practice without a healthy safeguarding culture. This is a discussion-based tool to support leaders of organisations to understand what a positive safeguarding culture looks like. It aims to help leaders assess their organisational culture in relation to safeguarding and develop clear actions to help prevent all types of harm, including sexual exploitation, abuse, and sexual harassment (SEAH).

This tool is designed to facilitate honest discussion and generate conversations to support teams or organisations to make important culture changes within their working environments. It is developed for both large organisations and small organisations. It is broken down into six sections, each focusing on different aspects of a positive safeguarding culture, including: accountability; policies and processes; do no harm/safer programming; survivor-centred approach; awareness raising; and safer recruitment and HR processes.
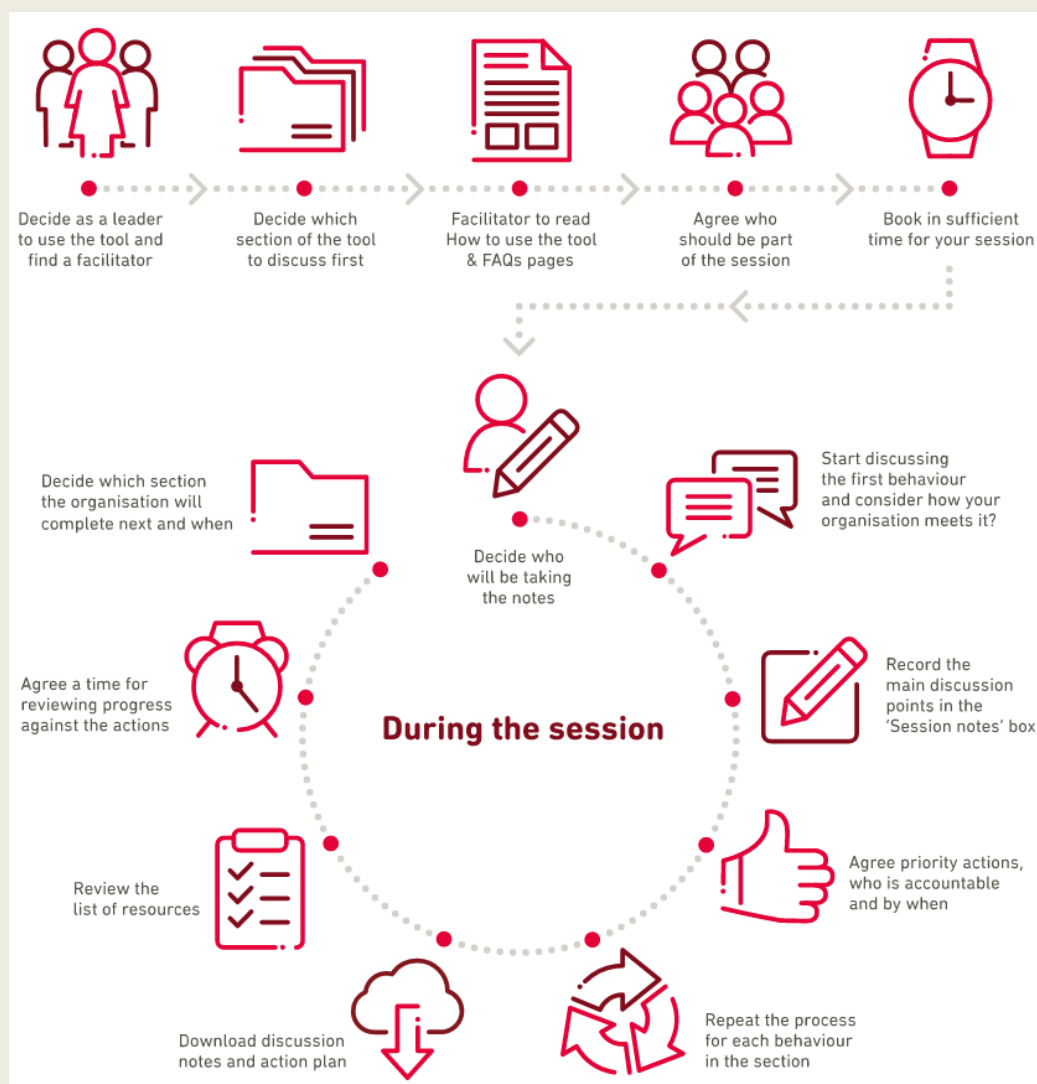
Source: Bond (2022[69]), Safeguarding Tool, . https://safeguarding-tool.bond.org.uk/.

Box 4.4. United Nations High Commissioner for Refugees (UNHCR) PSEA and Sexual Harassment training

In 2021, the UNHCR developed and launched an **internal Learning Package on PSEA & Sexual Harassment** (SH). These packages aim to develop skills, knowledge, and behaviour of all personnel to define, detect, prevent, and respond to sexual misconduct. Given COVID-19 restrictions and constraints, a virtual adaptation was produced, and they are currently being rolled out by country operations. Using interactive and experiential learning methodologies, the packages consist of a one-day training on PSEA and a half-day training on SH. Participants reflect on what they can do to prevent sexual misconduct and how to respond if it does happen. These packages have been translated to AR, FR, SP, RU.

Targeting specifically PSEA Focal Points (FPs) across UNHCR's operations, a **Case Conference** was launched as an interactive tool for 2h sessions, based on a video case study, developed to facilitate peer-to-peer exchange among PSEA FPs, and to unpack and better understand concepts, standards, and best practices that form the work around identifying the risk of, preventing, and responding to sexual misconduct. The Case Conference consists of small face-to-face or online group sessions, and provides the opportunity for shared learning amongst FPs, exchanging good practices and identifying actions to improve prevention and response at the operational level. The tool was rolled out across regions, with a total of 119 PSEA FPs from 50 operations, representing over 89 office locations. An external version of this resource was also produced and shared with inter-agency networks and partners. The tool is available in AR, EN, FR and SP.

PSEA/SH content was introduced or strengthened in several organisational learning programmes. Dedicated sessions have been delivered virtually to over 850 participants (may include repetitions where the same person attended more than 1 programme) through activities integrated in the UNHCR's learning programmes including the Inter-Agency Coordination programme, the Reflective Leadership Dialogues which focuses on culture change, the Senior Emergency Leadership Programme, Field Security Advisors Workshops, and Workshops for Emergency Management (including a multi-day simulation with SEA and SH live injects). In all learning and awareness raising activities the approach has changed from what is known as the 3Ps – Policies, Prohibitions, and Procedures, to engagement, open dialogue, and discussion. Focus is also on practical prevention measures including individual roles and responsibilities to build and maintain a protective environment, safe programming, and promoting a sense of collective responsibility.

Activities for **external partners and agencies** have also been designed and delivered, including dedicated sessions for regional NGO Consultations, and the IOM-led inter-agency PSEA Coordinators course. An e-learning on Investigations for partners was developed by UNHCR under the HC's Championship of the IASC and is currently being translated. In addition, a Facilitators' Guide for Session on Values, Attitudes and Org Culture was made publicly available for partners to use in engaging their teams on issues relating to workplace culture.

Source: UNHCR (2020[70]), United Nations High Commissioner For Refugees, Filippo Grandi's IASC Championship On Protection From Sexual Exploitation And Abuse And Sexual Harassment.

Box 4.5. Core Humanitarian Standard on Quality and Accountability: The CHS Alliance's PSEA Index e-Learning course

The CHS Alliance sets out the essential elements of Protection from Sexual Exploitation and Abuse and Sexual Harassment as part of the overall Core Humanitarian Standard (CHS) on Quality and Accountability. In 2020, the CHS Alliance published an updated **PSEAH Index** as part of its verification tools, to give organisations verifying their performance against the CHS the ability to determine whether they have the policies and practices in place to protect people in vulnerable situations.

The updated requirements are mapped against other sector-wide standards, including the IASC Minimum Operation Standards on PSEA, the UN Implementing Partner PSEA Capacity assessment and the DAC Recommendation. Available in Arabic, English, French, and Swahili, the accompanying Introduction to the PSEAH video is a useful introduction to the key requirements, indicators, questions and recommended evidence. The index can be used by any organisation regardless of sector, size, or location.

In 2022, the CHS Alliance launched an e-Learning training course, hosted on the Disaster Ready Platform, to help organisations to better understand and use the PSEAH index. The course is designed for all humanitarian and development workers, to highlight their direct or indirect responsibilities related to PSEAH. This includes, but is not limited to, programmes staff of any kind, managers of all levels, human resources, and PSEAH Focal Points.

Source: CHS Alliance (2022[71]). E-Learning: Understanding and Using the CHS PSEAH Index | CHS Alliance

Box 4.6. Sweden: An e-learning module for SEAH in development co-operation and humanitarian assistance

Sida developed a 30-minutes e-learning module for its staff, the Ministry for Foreign Affairs and Swedish Embassies. The objectives of the training are to:

- understand what SEAH is and its key concepts;
- be familiar with how to prevent and respond to SEAH;
- be familial with how to assess a partner organisation's capacity to prevent and respond to SEAH; and
- understand Sweden's commitments and the international framework regarding SEAH.

The training first defines concepts and the international frameworks currently in place. It is followed by an interactive case study with multiple choice questions involving acts of SEAH within a development programme. It covers every step from the assessment, warning signs, barriers, reporting to the responses, consequences, and potential improvements to the process.

The module follows a survivor-based approach and puts the survivor's experiences, rights, needs and wishes at the centre of reporting, investigations, and responses.

Source: Sida (2022[67]), E-learning course on SEAH in development cooperation and humanitarian assistance.

Organisational Communications

How an organisation communicates both internally and externally shapes the culture and beliefs of its employees. Everything from the language used, to the imagery, and the design of internal policies, plays an important role in shaping the internal culture and underlines the values and the social norms of the organisation (UNDP, 2018[72])[32].

Moreover, methods of communication that do not fully integrate gender can reinforce systemic biases and perpetrate harmful norms within organisations (Chatham House, 2021[73])[33].

Different systems, such as networks of focal points Box 4.7 either internally or externally, can also help facilitate and reinforce organisational communications.

Box 4.7. The importance of PSEAH Focal Points: the Swiss example

PSEAH Focal Points support the management in ensuring prevention activities such as awareness raising and trainings of staff. In addition, the PSEAH Focal Point assists management in identifying gaps in the PSEAH prevention and response mechanism. Each Swiss Representation identifies a person who can assume this responsibility.

Responsibilities of the PSEAH Focal Point of the Representation:

- Ensure that PSEAH is regularly discussed in the Swiss Representation and that staff understand the causes, expressions and effects PSEAH through trainings and awareness activities;

- Support the Representation to integrate PSEAH in security risk assessments and to support programme staff to include SEAH risk assessments in project monitoring visits and project reviews

- Guide the PSEAH Partner Risk Assessment process

- Link partner organisations with insufficient mechanisms to know-how and technical resources that support them in elaborating and implementing an adequate action plan

- Support management in addressing PSEAH cases.

Source: Swiss Agency for Development and Cooperation (2020[74]), Addressing Prevention of and Protection from Sexual Exploitation, Abuse and Sexual Harassment (PSEAH) in Partner Organizations.

Table 4.2. Key considerations for an organisation's communications

Considerations	Tips
Train staff to understand **the difference between 'gender-sensitive,' 'gender-neutral', and 'gender-transformative'** language	In particular, learn how language can perpetuate bias and discrimination. • Gender-sensitive language ensures gender is appropriately discussed. • Gender-neutral language is not gender-specific. • Gender-transformative language changes biased thinking.
Avoid using harmful stereotypes	These are stereotypes usually associated with character, physical characteristics, roles, and professions. Learn how to recognise and challenge them.
Avoid using gender-discriminatory language	Any language that demeans or ignores women, men, or any other gender or gender

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[32] http://www.undp.org/eurasia/publications/10-principles-gender-responsive-communications
[33] http://www.chathamhouse.org/2021/02/gender-think-tanks-and-international-affairs-toolkit

	non-conforming people.
Images and design used should be relevant and given full proper ethical consideration	Images and design are powerful ways of communicating, and are influential in shaping perceptions, values, and norms. For instance, imagery referencing humanitarian aid work can often depict women and children in developing countries as weak, poverty-stricken victims without agency. These can reinforce power imbalances, as it often depicts aid workers in positions of power and influence as they carry out humanitarian duties
Ensure communications are not just one-off	Make sure that communications about SEAH are not one-off but rather pervasive and repetitive. Repetition is key to conveying the importance of SEAH and spreading awareness. Ensure that messages reach all staff, including those in the field and/or those that frequent the office less often, and/or those who use different languages.
Defined roles and responsibilities	Be clear on who will be ensuring that the communication is happening and that people are effectively receiving it. In other words, make sure that communication and messaging responsibilities across different positions are clear (see Box 4.7. The importance of PSEAH Focal Points: the Swiss example).

Source: Adapted from BASIC (2021[75]), Gender, think-tanks and international affairs.

Box 4.8. IASC Communications Package on Addressing Sexual Misconduct

Addressing sexual misconduct in the humanitarian sector is a communications package to guide managers and those in leadership positions in meaningful dialogue with staff on issues of sexual misconduct. The tool facilitates often uncomfortable discussions and aims to promote transparency and a "speak-up culture".

This simple tool aims to guide senior managers in holding a one-hour discussion with staff on SEA and SH. The objective is to highlight the role of leadership, by reinforcing the message that there is no place for such behaviour in the organisation and by encouraging self-reflection on personal perceptions, unconscious biases, and active engagement by all.

Source: IASC (2021[76]), IASC Communications Package on Addressing Sexual Misconduct.

Campaigning for change

Why is awareness raising important?

To effectively prevent and respond to SEAH, it is crucial that everyone (employees, volunteers, and affected communities) understand the root causes of SEAH, and their obligations and rights, as well as how to safely report a misconduct concern. A successful campaign has the power to help individuals identify the problem and understand their roles and responsibilities in shaping solutions.

Initiatives can raise awareness, educate, or inform specific groups about their rights and/or actions to take. For example, a campaign may aim to encourage people to intervene when they witness any form of violence against women. Other campaigns may seek to notify specific groups of people (such as women) about their rights as potential victims and education programmes can address youth at an early stage to discourage them from adopting harassing behaviours.

Ultimately, all outreach initiatives share one common objective – **to change particular behaviours** (for example, the violence itself, low reporting of rape, how to recognise harassment, inappropriate handling of reporting, stereotypical attitudes towards women and girls, etc.), among **different target groups** (victims/survivors, organisations, etc.).

Box 4.9. The Forumtheatre as self-reflective awareness raising tool, Switzerland

In international co-operation, staff at head offices and at country offices need to be able to react immediately and correctly in case of sexual misconduct in their direct working environment or by their contractual partners. The key elements of every response are prompt action and survivor-centred protection. But how do we recognize sexual harassment or exploitation? How must the supervisor react? And what can and must we do to protect the whistle-blower?

The **Forumtheatre "Fit for PSEAH?"**, developed by SDC, introduces the audience to concrete SEAH situations. "Fit for PSEAH?" is one element in a series of measures that should contribute to increased awareness and know-how as a basis for creating a functioning PSEAH mechanism.

The training package contains a video-tool with accompanying moderation guide structured along 3 PSEAH cases (see also below) and is available in English and French (Spanish version in preparation).

The Forumtheatre "Fit for PSEAH?" tool is designed for various teams and groups working in international co-operation. The examples should clearly illustrate the hierarchical mix that can occur in PSEAH and the need for full responsibility by perpetrators. Therefore, all groups and teams that participate in the Forumtheatre should include members of the management. It is also particularly suitable for Country Office staff which are in co-operation with partner organisations.

The Forumtheatre uses three different stories about PSEAH, involving staff of a country office, their supervisors and partner organisations. Each story deals with **PSEAH from a different perspective**. The individual scenes played by professional actors are repeatedly interrupted to discuss questions with the audience or to involve them in finding solutions. The interaction with the audience takes place by voting, in discussion blocks, and through inputs from experts. Group work allows participants to explore the feelings of individual characters and to identify their needs and concerns. A moderation team (comprised by a man and a woman) guides through the Forumtheatre and animates the discussions and joint reflections on the topic. Specialist resource persons provide inputs on relevant policies and standards regarding PSEAH, the **correct reaction for whistle-blowers** and **staff in management positions** and the **grounding principle of the survivor-centred approach**.

Source: Swiss Foreign Ministry, Forumtheatre "Fit for PSEAH?"

Box 4.10. Canada's Digna - A resource hub for the prevention of SEAH

Sharing information and resources are important parts of efforts to prevent and respond to SEAH. Global Affairs Canada is funding Digna, the Canadian Centre of expertise on the Prevention of Sexual Exploitation and Abuse (PSEA). Digna aims to contribute to organisational culture change within the Canadian international co-operation community by providing training, online resources, and consultation services for the adoption of gender-responsive best practices with the ultimate goal of preventing sexual exploitation and abuse in operations and partnerships, particularly of women and girls.

One of the objectives of Digna is to make resources on PSEA more accessible to Canadian organisations and their partners. There are a wealth of resources available online; but finding them and determining their usefulness can be challenging. Digna has collected a growing list of resources created by agencies across Canada and around the world and is committed to reviewing and recommending them as appropriate.

Digna hosts many resources, such as: Examples of organisational policies, Codes of conduct, Tools and templates, Trainings, Reporting mechanisms, Investigation, and Digital media.

Source: Digna (2019[77]), https ://www.digna.ca

Box 4.11. United Kingdom's Resource and Support Hub: Safeguarding Essentials

The Safeguarding Resource and Support Hub (RSH) is a programme that aims to support organisations in the aid sector to strengthen their safeguarding policy and practice against Sexual Exploitation, Abuse and Sexual Harassment (SEAH).

RSH has an Online Hub website available in English, Arabic, French and Swahili and is free for anyone working in the aid sector to use. It includes a resource library, e-learning courses, a safeguarding consultants directory, and webinars and podcasts.

It has recently developed a "Safeguarding Essentials" package with a selection of guidance and tools on safeguarding such as risk assessment tools.

Source: Resource and Support Hub (2022[78]), https://safeguardingsupporthub.org/essentials.

What drives us? Behaviourally informed outreach

SEAH does not exist in isolation and is an 'outcome' of a host of environmental factors, inextricably linked to social, economic, and political frameworks and the inequalities and power imbalances that derive from those. These shape local and national social norms in formal and informal institutions, including a direct impact on organisational culture and values. For example, in development contexts, women and marginalised groups are often underrepresented within decision-making and power structures. Understanding and acknowledging the **multi-faceted and interactive effects of personal and environmental factors that determine behaviours**, helps to identify the parameters for sustainable change and prevention through specific action and collaboration across multiple stakeholder groups, ideally driven by the voices of those women and marginalised groups.

Often traditional outreach and awareness-raising campaigns miss these important factors and fail to recognise that providing individuals with the right information and education will rarely automatically translate into optimal choices and changed behaviour. Outreach strategies must recognise that human behaviours are much more complex and start with listening to those whose access to rights and needs are most negatively affected by prevailing attitudes and norms. People are highly emotional and influenced by their environment, by those that are closest to them, and by those with whom they interact. Efforts should first aim to change environments before changing individuals.[34]
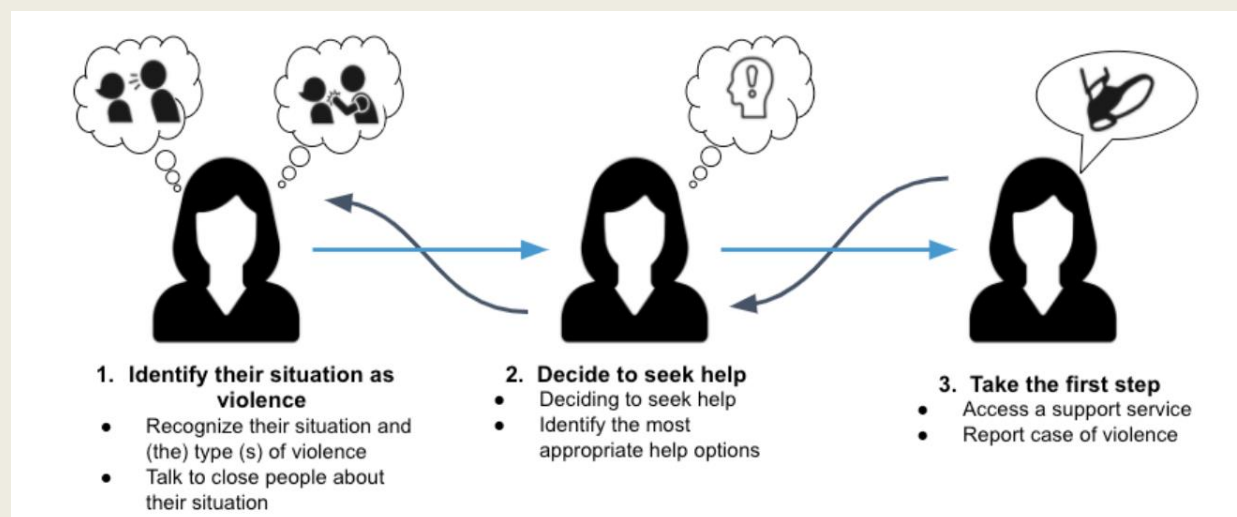
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[34] See tool in annex: Socio-Ecological Model levels (SEM) that maps various levels of influence that can shape a person's behaviour – developed by UNICEF – strives to fill this gap by increasing the use of theorical foundations in programme design.

Table 4.3. Key considerations when developing a SEAH campaign

Considerations	Tips
Understand and acknowledge the context	Gaining insight and understanding the local power and social context, including gender norms, behaviours, and access to rights for women, children and marginalised groups is necessary when designing a SEAH campaign. Undertaking a SEAH risk assessment to understand the likelihood of SEAH, and how to equip those creating and rolling out the campaigns with the necessary knowledge and understanding is essential.
Ensure that victims/survivors of SEAH and specialist organisations are involved in the process of campaign development to ensure appropriate messaging.	Include marginalised groups in the development of the messaging to ensure that the campaign has an intersectional perspective and accounts for a range of experiences through consultative, inclusive dialogue..
Avoid messaging that disempowers victims/survivors and overly "sanitising" or obscuring the issue.	For example, avoid trivialising the experience of those experiencing SEAH. Be careful not to portray victims/survivors as "helpless", using sexually objectifying imagery, and perpetuating victim/survivor-blaming messaging such as telling victims/survivors to avoid harassment by dressing differently, or being more responsible in relation to their own safety. Behaviours should be named. For example, "rape" should not be referred to as sexual misconduct in awareness raising activities with the public.
Recognise and be mindful of the different accessibility needs of the target audience when communicating policies and support services.	Use plain language, choose accessible fonts, and make campaigns clear.
Be sensitive to specific contexts regarding SEAH.	In places where issues around gender or gender equality are sensitive or can be considered taboo, it may be more effective to first develop a campaign that brings gender norms into the open for discussion and address the underlying drivers of SEAH rather than confronting SEAH directly.
Aim to embed a behavioural approach	1. identifying the potential behavioural element (i.e., the trigger) of the target behaviour; 2. proposing behavioural levers that can be used to induce the behavioural change; and 3. measuring the expected and actual impact of the initiatives.
No "one-size-fits-all" solutions	Initiatives aiming to prevent and respond to SEAH should be targeted and as tailored as possible so that the focus is on the root causes of wrongs/the problem and on the relevant target audience. There should be a clear call to action and purposely designed to encourage or discourage a specific target group to perform a specific behaviour. The campaign is clear in its messaging, objectives, and in identifying its target audience.
Adopt behavioural levers that induce the desired behavioural change	For example, people are likely to perform a particular behaviour when they perceive it as in line with social norms. Harnessing the power of social norms can help to challenge the perception that any form of sexual exploitation, abuse or harassment is a private issue, which deters people in the victim's/survivor's social environment from intervening.
Conduct pre-testing where possible	This can be useful to compare the effects of various initiatives or different messages and to inform the choice of the most powerful one. Always ensure that pre-testing both qualitatively and quantitatively are in line with ethical standards.
Identify specific sexual exploitation, abuse, and harassment issues	A campaign should use evidence-informed approaches when considering what aspect of SEAH to address. It is a multi–faceted and nuanced issue and no single campaign can tackle it in its entirety.

A study from the Behavioral Economics Guide with survivors focused on recognising warning signs, promoting early help-seeking, and encouraging safety planning.

1. **Identify their situation as violence**
- Recognize their situation and (the) type (s) of violence
- Talk to close people about their situation

2. **Decide to seek help**
- Deciding to seek help
- Identify the most appropriate help options

3. **Take the first step**
- Access a support service
- Report case of violence

Source: Bellatin & Paloma (2021[79]) The Behavioral Economics Guide 2021

Uncertainty aversion (the preference of known risks to unknown risks) and sunk cost fallacy (continuing a behaviour as a result of previously invested resources) were two of the strongest barriers to help-seeking that we identified in their qualitative research.

The positive results from the trial suggest that tackling these barriers (i.e., reducing uncertainty about what happens after you contact a support service, and helping survivors understand how remaining with an abusive partner affects their well-being) can be an effective way of encouraging help-seeking. The image addressing sunk costs, which invites thoughts of a positive future and the end of a negative situation, was also cumulatively the strongest of all images, leading to the largest impact on women's likelihood to reach out for help. This suggests that taking the time to understand key behavioural barriers and develop an evidence-based theory of change is critical to addressing SEAH/GBV effectively.

In the trial presented in this paper, researchers mapped barriers to a desired behaviour (online help-seeking) for a specific actor (GBV survivors in Honduras), in order to devise and test targeted interventions to address those barriers. This trial illustrates three core aspects of a behavioural approach to developing GBV prevention policy:

1. drawing on **evidence;**

2. developing a **behavioural map** that describes barriers to key behaviours and dynamics among specific actors;

3. tailoring interventions grounded **in context** to address these barriers.

Source: Bellatin & Paloma (2021[79]) The Behavioral Economics Guide 2021

Checklist on Pillar 4

DAC members can helpfully ask the following questions:

- Is training on SEAH conducted on a regular basis? Are different forms of training used, and different groups targeted (for ex: at different levels of staff, management, etc.)

- Do training and capacity building efforts include information on standards, codes of conduct, mechanisms to file complaints and report misconduct, and the implications of breaching standards, including anti-retaliation policies?

- Do these activities include information so that all staff, partners, and local populations are aware of their rights, reporting mechanisms, and available support services? Are they informed by inclusive approaches and consultation?

- Do communication efforts and awareness-raising activities target aid recipients and local populations? Are these educational and preventative outreach efforts included in work with and for implementing partners?

- Are tools and materials shared between headquarters, field offices, implementing partners, and local and national governments, and where possible with other organisations, as well as public bodies including local authorities, where safe and appropriate?

Annex 4.A. An integrative model of behavioural prediction

Annex Figure 4.A.1. An integrative model of behavioural prediction

Distal variables

- Demographic variables
- Culture
- Stereotypes and stigmas
- Personality, moods and émotions
- Other individual differences variables (e.g., perceived risk)
- Exposure to media and interventions

Behavioural beliefs and outcome evaluations → Attitude

Normative beliefs and motivation to comply → Perceived norm

Efficacy beliefs → Self-efficacy

Skills and knowledge

Intention

Environmental constraints

BEHAVIOUR

Source: Adapted from (Fishbein and Yzer, 2003[80]).

Annex 4.B. The Socio-Ecological Model

The Socio-Ecological Model (SEM) is an analytical tool that maps together several levels of influence and factors that can shape a person's behaviour. There are five nested concentric layers, from inner to outermost: individual/intrapersonal (e.g., beliefs, knowledge, skills, etc.), interpersonal (e.g., family, friends, and colleagues), community (e.g., relationships among organisations, social norms, etc.), institutional (e.g., organisations and social institutions, services, etc.), and societal (e.g., laws and policies). Acknowledging that because of the multifaceted and interactive effects of personal and environmental factors that determine behaviours, sustainable change requires action and collaboration across multiple levels.

Annex Table 4.B.1. Description of Socio-Ecological Model levels

SEM level	Description
Individual	Characteristics of an individual that influence behaviours, including knowledge, attitudes, gender, age, self-efficacy, developmental history, religious identity, racial/ethnic identity, sexual orientation, economic status, financial resources, values, goals, expectations, literacy, stigma, and others.
Interpersonal	Formal and informal social networks and social support systems that can influence individual behaviours, including family, friends, peers, co-workers, religious networks, customs, or traditions.
Community	Relationships among organisations and informational networks within defined boundaries, including the built environment, local associations, community leaders, businesses, transportation, as well as social rules applying to the local community.
Organisational	Organisations with rules, procedures, and regulations to structure everyday life, including for operations that affect how, or how well, for example, services are provided for citizens.
Policy/Enabling Environment	Local, state, national and global laws and policies affecting the issue of interest, either as the promoters or barriers to interventions and changes.

Source: UNICEF (2018[81]), Module 1: What are the Social Ecological Model (SEM), Communication for Development (C4D)?.

Annex 4.C. Designing an initiative to counter SEAH in 4 steps

The following four steps should be followed when designing the awareness raising, outreach, or education initiative (Lee and Kotler, 2021[82]):

1. Determine the objectives of the initiative
2. Identify the target audience
3. Design the message: content, framing, and source
4. Evaluate

1. Determine the objectives of the initiative[35]

*   The objective of the campaign can vary – from reducing the number and severity of SEAH cases, to increasing the levels of reporting. It is important to identify the target behaviour[36] when defining the objective(s).
*   Objectives must also be specific. For example, an objective could be to reduce people's tolerance of SEAH (changing attitudes), or to change the tendency that people do not intervene when they witness violence (changing social norms).[37]
*   The objectives should be measurable, if possible, accompanied by quantifiable indicators. Examples of indicators can include: the number of cases reported or women's level of awareness of helplines. Indicators can also be captured through surveys before/after a campaign. Objectives should be SMART (Doran, 1981[83]), i.e., specific, measurable, attainable, realistic, and timely. Once an intervention has been implemented, its impact should be evaluated *ex-post* and compared to these objectives (see Pillar 6 on Monitoring and Evaluation).

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[35] These indications also build on learning from Chatham House (2021) Gender Think Tanks and International Affairs Toolkit and UNDP's (2018) 10 principles of gender-responsive communications.

[36] A behavioural approach should be taken into account. OECD defines Behavioural insights as an inductive approach to policymaking that combines insights from psychology, cognitive science, and social science with empirically tested results to discover how humans actually make choices. This field of work is based on human behavioural traits and intervention design experiments spread across multiple fields. See https://doi.org/10.1787/9789264270480-en.

[37] See tool in annex 4b for an additional option of analysis: Socio-Ecological Model levels (SEM) that maps together various levels of influence that can shape a person's behaviour – developed by UNICEF – strives to fill this gap by increasing the use of theorical foundations in programme design.

What can be used to identify an initiative's objective(s)?

- SEAH research conducted within the organisation, nationally or internationally, in the field, or with the partner country.
- Attitudinal or experiential surveys of SEAH in the community
- Focus groups with staff and employees in relation to SEAH
- Victims/survivors testimonies

2. Identify the target audience

- Campaigns and initiatives should be purposely designed to encourage a specific target group to perform a specific behaviour, or to discourage them from doing so. Identifying who makes up the target audience is pivotal in shaping campaign messaging, as this will influence the tone, content, and design of the campaign.
- Multiple factors (attitudes, subjective norms, demographics, culture, etc.) are underlying causes of SEAH. It would be unrealistic for an initiative to try and tackle all factors at once, therefore campaigns should focus on a limited number of behavioural causes that hold relevance for the problem and the target group in question.
- It is important to describe the target audience in terms of socio-demographic characteristics. For example, age, level of education, place of living, traits, and habits. This will help shape the messages in order to reach the target audience and identify the appropriate channels to reach the particular audience. For instance, if it is found that many offenders of SEAH are men from a particular socio-economic background, then one should select media consumed by this segment of the population as the main channel for the campaign.
- In some cases, campaigns can have a more general target audience, such as the public. Campaigns can also target opinion leaders, following the logic that influential people are important messengers within communities, and will disseminate messages to the public, which can be more convincing.

Examples of target audiences

- **Victims/survivors:** the campaign might raise awareness of issues such as the services that are available to them, and could encourage them to report. Messaging could include themes of safety and protection, and above all confidentiality.
- **Perpetrators:** the campaign could highlight various types of perpetrator behaviour and make them aware that they will be held accountable for such behaviour.
- **Community/Public:** Campaigns can also make the broader community aware of the role that individuals in the community all play in changing the culture and creating a more open environment to discuss SEAH.

3. Design the message: content, framing and source

- When designing the message, take into consideration the content of the message; how the message is framed; and who should convey the message.

- It is important that the content of the message is credible: the information being communicated is accurate, based on evidence and data, and not hearsay.

- In addition, in the case that a campaign advertises a specific service, it is essential that there has been an appropriate expansion of the service capacity to meet the potential increase in demand (Donovan and Vlais, 2005[84]).

- The way the message is framed can also influence its perception and effect. Framing factors include, for instance, the choice of words and imagery, and using emotions versus rational arguments.

In framing messages conveyed in awareness campaigns, utmost attention must be paid to avoiding Cialdini's "big mistake" (Cialdini and Trost, 1998[85]). This refers to instances where the behaviour one is actually trying to discourage (rather than the appropriate behaviour) is communicated as being relatively common, thus inadvertently having a counterproductive effect. This point is of particular relevance for violence against women and SEAH campaigns.

Choose the channel

- There is a wide variety of communication channels to choose from to convey messages.

- Online social networks are a relatively recent option, offering the possibility of interactivity and the potential viral dissemination of the message.

- Go to where your audience is – not necessarily online.

Building a community approach – the messengers

- Raising awareness is an important first step, but working together with local community-based networks can build trust.

- Community based approaches in terms of campaign development are those that engage community members, developing a collective analysis of how SEAH issues affect them. Community leaders should also be included in the design of outreach campaigns and awareness raising efforts. Cultural transformation requires a collective community and a wider societal effort. Identifying SEAH focal points with specific responsibilities related to the prevent of sexual exploitation and abuse, including helping people access support resources as well as through training and awareness raising activities is a crucial component of the wider training efforts.

- Civil society organisations (CSOs), community-based organisations, and faith-based organisations often maintain close relationships with communities and are critical partners for raising awareness as they can have an influence over local dynamics, and the social and moral orientation of their constituencies thanks to the "trust capital" they have earned. They can facilitate a level of dialogue that is unique to their community and can help implement research, planning, and facilitate the roll out of campaigns.

Pre-test the message

- Pre-testing and piloting initiatives before deploying them, along with systematically evaluating their impact, is crucial in order to implement effective initiatives. This is particularly important with ethically sensitive issues such as SEAH.

- Examples of qualitative pre-testing can include gathering feedback (such as through offline or online focus groups) on the campaign message's appeal, clarity, comprehension, cultural acceptance, and credibility. This form of pre-testing can also examine the audience's emotional reactions to the message. Alternatively, individual in-depth interviews can be conducted, and can be well suited to topics that are highly sensitive, and where people may be reluctant to discuss freely in a group setting. This includes, for example, if survivors of SEAH are the target audience of the campaign.

4. Evaluating the impact of the initiative

Evaluation should not just be a "tick-box exercise", but rather it should be included from the beginning of the design of campaigns. Evaluation is critical to building successful campaigns and understanding their impact, as it ensures a focus on what actually works and where further development is needed for future initiatives. Set objectives for the campaign that can be tracked during and after its implementation. A sample objective could be increasing the number of people who know how to access support services for SEAH survivors. Quantitative goals in support of this could include directing people to a specific web page, or an increase in the number of people reporting via an online submission form.

Examples of ways to evaluate and measure campaign initiatives include:

- Monitoring website traffic as a useful indicator of interest in the campaign; this includes noting the search terms and referral paths that bring individuals to the campaign website.

- Monitoring social reach: use platforms' native analytics tools to understand the demographics of those interacting with the campaign.

- Developing a survey at the launch of the campaign to create a baseline reference, before repeating it during and on completion of the campaign to understand how awareness levels changed throughout its implementation.

5 Pillar 5 – International co-ordination for SEAH prevention and response

International co-ordination

Closer co-operation between stakeholders, and reinforcement of existing commitments

As cited in the DAC Recommendation:

a. *Coordinate internationally with donors and implementing partners to set clear standards and expectations, align existing measures to the extent possible, respond to survivors' and victims' needs, and take comprehensive action in SEA and SH prevention and response.*

b. *Include existing commitments by some DAC members as a policy basis for action on prevention and response, including the Core Humanitarian Standard on Quality and Accountability (CHS), the Inter-Agency Standing Committee Minimum Operating Standards (MOS-PSEA), relevant OECD and DAC Recommendations, and other relevant international commitments, including the Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector at the 2018 London Safeguarding Summit.*

c. *Ensure closer co-operation and collaboration among DAC members, implementing partners, and international and national experts on SEA and SH prevention and response; the UN, specifically the Inter-Agency Standing Committee (IASC); and the UN System Chief Executives Board for Coordination (CEB). Particular efforts should be made to align standards for survivors' and victims' support, investigation management, and reporting by implementing partners.*

Co-ordination (across international, national, and sub-national levels) remains critical to ensuring the effectiveness of development co-operation and humanitarian assistance across all sectors. Stopping and managing the perpetration of SEAH requires a co-ordinated approach in a number of ways:

Co-ordination and alignment on international standards and approaches to tackling SEAH across the aid sector (humanitarian, development ,and peacekeeping) to enhance coherence, increase aid integrity, reduce transaction costs and improve accountability and response to survivors 0

- Organisational culture and norms.
- Collaboration and co-ordination with stakeholders on support services including referral services 2Pillar 2 – Develop or support survivor- and victim-centred response and support mechanisms.
- Co-ordination across reporting and complaints mechanisms including examples of models; and across investigations, data handling/sharing Pillar 3 – Reporting and complaints mechanisms.
- Co-ordination across human resource policies and employment practices Pillar 4 – Training, awareness raising and communications on SEAH prevention.
- Outreach, inter-agency training and learning Pillar 5 – International co-ordination for SEAH prevention and response.

Donors and other stakeholders have reported reinforcing co-ordination, with different objectives relating to ending SEAH. This includes: to set clear standards and expectations; align existing measures to the extent possible; respond to victim/survivors' needs; and take comprehensive action to SEAH prevention and response.

The section examines the role of instruments and standards – and the continuous development of additional tools to accompany such standards – as key elements of support to donors, implementing partners, and others in SEAH prevention and response.

International instruments and standards

International actors including governments continue to draw from key core standards to guide their actions, including **the DAC Recommendation on Ending SEAH**, the **Core Humanitarian Standard on Quality and Accountability** (CHS), and the **Inter-Agency Standing Committee Minimum Operating Standards (MOS-PSEA)**, among others. Key references to other instruments.

Efforts to strengthen these standards and develop complementary resources continue. For example, an External Review of **IASC** efforts on Protection from SEA and SH was conducted (IASC, 2021[86])[38] and the IASC endorsed a new Protection from Sexual Exploitation and Abuse and Sexual Harassment Vision and Strategy 2022-2026 (IASC, 2022[87]). The IASC Champion on Protection from Sexual Exploitation and Abuse and Sexual Harassment[39] continues to play an important role, reinforcing visible leadership to address challenges and collective action. The IASC Technical Advisory Group (TAG) on PSEAH supports co-ordination (Inter-Agency Standing Committee, 2023[88]). Supplementary tools have also been developed by the IASC, to better share information between stakeholders, which contributes to facilitating co-ordination. This includes, as an example, the global dashboard that tracks progress to implement PSEA within humanitarian responses at country-level (Inter-Agency Standing Committee, 2023[89]).

Exercises such as the External Review and actions taken in response can provide lessons and recommendations relevant beyond the humanitarian sector Box 5.1. IASC standards and review: lessons learned across SEAH prevention and response , as they are global in nature.

Reporting on the 2003 UN Secretary General's Bullet on Special Measures for PSEA (IASC, 2023[90]) provides useful information for the UN, its Members and partners, but also prompts co-ordination within the UN and its Members around his annual reporting exercise. The inclusion of standing or ad-hoc items on UN agency executive board meetings in relation to SEAH also prompts and facilitates co-ordination between governments.

The (CHS) Core Humanitarian Standard on Quality and Accountability has undergone review, to update and improve the previous standard (CHS, 2024[91]) This aims to make the standard better able to adapt to a changing environment, drawing on learning and new developments and innovations. The objective is also to make the Standard more accessible and user friendly for different stakeholders – particularly by the people vulnerable to and affected by crisis. The CHS continues to be an essential tool in the sector. CHS is also supported by the Humanitarian Quality Assurance Initiative (Humanitarian Quality Assurance Initiative, 2023[92]), which monitors the implementation of this standard and assesses the performance of organisations.

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[38] The review was commissioned by the 2021 IASC PSEAH Champion, UNFPA Executive Director Dr. Natalia Kanem.

[39] In January 2022, Mr. Andrew Morley, Chair SCHR(President and CEO World Vision International) assumed the Inter-Agency Standing Committee (IASC) Championship on Protection from Sexual Exploitation and Abuse and Sexual Harassment (PSEAH) taking over this role from Dr. Natalia Kanem, Executive Director, UNFPA, IASC Champion 2021-2022.UNICEF and UNHCR served as previous champions.

Bilateral donor co-ordination has increased through efforts such as the DAC, the UK-chaired SEAH donor Technical Working Group (TWG), and other smaller groups. Co-ordination has increased at different levels, including across capital headquarters, key diplomatic postings (such as the UN in New York, Geneva, and Rome). This includes, for example, follow up to the 2018 London Safeguarding Summit (United Kingdom, 2018[93]) and co-ordination activities across different groups of stakeholders[40]. Bilateral donors and other actors have also increased their efforts to co-ordinate at country-level, including in response to major crises.

In addition, political recognition of the importance of SEAH prevention and response and international co-ordination at the global level has increased. This is demonstrated through commitments such as: The Whistler declaration on protection from sexual exploitation and abuse in international assistance and the G7 Foreign and Development Ministers' Meeting: Communiqué.

Box 5.1. IASC standards and review: lessons learned across SEAH prevention and response

The *External review: Global Report on Protection from SEA and SH* (2021) was conducted to provide an **independent assessment** of the impact and effectiveness of the IASC approach to PSEAH. IASC standards in place since 2012, and the previous review in 2010 provide a basis for monitoring progress. The IASC agreed to a new Protection from SEA and SH Vision and Strategy 2022-2026 (IASC, 2022[87]) and Workplan. The External review's analysis and recommendations provide critical learning from the **humanitarian** community, and also **provides lessons for others**, as the scope of the review is **global**.

Overall, the review found that the IASC has prioritised leadership attention to PSEA; mobilised resources to agreed priorities; invested in inter-agency guidance, tools, training, and mechanisms; and country-level leadership and co-ordination have been reinforced. The level of awareness and understanding of the importance of effective PSEA to build trust in the humanitarian system across IASC members, globally, and at country level, has fundamentally and positively changed since 2010.

The External Review focuses its reflections around four themes, which also provides recommendations applicable to other sectors and a multitude of actors:

1. **Victim-centred approach**: the implications of a victim/survivor-centred approach has not been adequately discussed, in terms of the implications resulting from these responsibilities on the organizational culture, services, and resources; including GBV experts in this dialogue is critical; ensuring appropriate, safe, timely and accessible services for victim/survivors of all GBV is the responsibility of all IASC members, not only those who are direct service providers.

2. **Community engagement**: despite strong understanding of the barriers to reporting experienced by SEAH victims/survivors, this is not systematically applied in the design of community feedback and complaints mechanisms; risks associated with partnerships with local governments/authorities not yet satisfactorily addressed in most contexts; and the potential for working closely across the humanitarian system with all clusters, ensuring all workers are responsible for delivering PSEA commitments has not yet been realized.

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[40] Annual reports on progress against the London Summit commitments continue to provide information around efforts across groups of stakeholders, see https://www.gov.uk/government/publications/safeguarding-against-sexual-exploitation-abuse-and-harassment-cross-sector-progress-report-2021-to-2022/cross-sector-progress-report-on-safeguarding-against-sexual-exploitation-abuse-and-harassment-seah-2021-to-2. Previous reports Safeguarding against sexual exploitation and abuse and harassment (SEAH) in the aid sector - GOV.UK (www.gov.uk) The donor TWG has coordinated several joint Ministerial letters and engagements with the UN Secretary General since 2018, which has led to concrete progress in areas such as aligned SEAH language in funding agreements.

3. **Leadership, co-ordination, accountability**:
   a. The focus of the IASC Principals and Secretariat on SEA and SH has been unwavering over the last decade, and responsibility for PSEA has been firmly embedded at the field level; however, little evidence on whether the mechanisms that have been prioritized (CBCM, PSEA Network, PSEA Coordinator) are delivering; and the support provided by the IASC Secretariat is inadequate to meet current PSEAH commitments.
   b. Some progress on mechanisms for aggregating allegations, but current systems do not allow IASC members to understand the number and pattern of allegations in relation to the measures that they are putting in place for PSEA in humanitarian contexts; the pressure on the limited capacity able to undertake SEA investigations will continue to grow; clear and meaningful progress has also been made on the key issue of reference checking,

4. **Sexual harassment**: clear majority of those interviewed, particularly women, believe that humanitarian agencies have not taken sufficient action to address SH; IASC Principals have committed to addressing SH on many occasions, but the implications of these commitments and the responsibilities are not sufficiently understood at member or country level.

Source: IASC (2021[86])

OECD instruments in supporting DAC Members and the international community in addressing the root causes of SEAH

International instruments and standards, including the OECD, provide an important normative framework to reinforce individual and collective action to prevent SEAH.

Gender inequalities remain an underlying factor that perpetuates SEAH. Governments continue to make efforts to improve their policies and practices on gender equality, including through the implementation of the 2013 OECD Recommendation on Gender Equality in Education, Employment and Entrepreneurship (OECD, 2017[94]) [and the 2015 OECD Recommendation on Gender Equality in Public Life (OECD, 2016[95]).

Monitoring of implementation of these Recommendations (OECD, 2022[96]) point to a number of areas where OECD Member governments have made progress, but also where challenges remain. These findings provide an indication of underlying challenges and roadblocks to taking effective action to better support gender equality globally. Being aware of such challenges and trends in the roll-back of gender equality are critical to understand. A number of long-standing and new challenges have been identified, which threaten progress on gender equality across a number of sectors: longstanding gender biases and lack of data hinder progress on gender equality; persisting gender stereotypes threaten progress towards gender equality in education; gender gaps in employment have slowly decreased, but are far from being closed; gender equality will not be achieved without eradicating VAW; and gender gaps in entrepreneurship have slightly narrowed, but women experience greater barriers than men to set up and maintain their businesses.

Reinforcing the prevention of SEAH will require action across ministries, sectors, and different teams within government (and other institutions). The use and implementation of these Recommendations will further increase the implementation of the DAC Recommendation on Ending SEAH.

In the development and humanitarian sectors, tools such as the DAC *Guidance for Development Partners on Gender Equality and the Empowerment of Women and Girls* (OECD, 2022[10]) will continue to influence

political decision-making and reinforce actions within the development and humanitarian sectors. Strong frameworks that support gender equality are necessary for smart and effective action on SEAH prevention and response. Further guidelines are provided below Box 5.2.

OECD efforts across instruments and policy approaches in the area of **VAWG and GBV** more broadly are also important to take into consideration. In order for government strategies to effectively respond to and prevent SEAH, they should reach across government: policy coherence across sectors and levels of government are important, not only limited to development and humanitarian assistance.

Box 5.2. Key development tools and instruments for reinforcing gender equality

Strong policies and frameworks targeting GE and mainstreaming GE will support efforts on SEAH prevention and response. The *DAC Guidance for Development Partners: Gender Equality and the Empowerment of Women and Girls* offers a practical handbook for development partners as they strive to advance gender equality. It is designed around the programme cycle and beyond; from policy framework through analysis, design and implementation, to learning and evaluation. It sets out opportunities for increasing financing for gender equality with and beyond official development assistance (ODA), and the challenges of how best to establish the internal organisational systems required to deliver on gender equality in all development and humanitarian assistance efforts.

Key points to consider:

- **Policy frameworks and leadership:** Leadership commitment and a sound policy framework recognising the importance of gender equality and the empowerment of women and girls are cornerstones for effective development co-operation. Approaches for development partners should address unequal power relations and harmful structures and norms, including working more closely with local women's rights organisations, in order to achieve transformative change; and take into account inequalities that intersect with gender.

- **Planning and design of development programmes:** well-designed programmes, based on analysis of context and gender equality; tools such as theory of change and gender equality continuum frameworks are helpful; consideration of gender norms and roles; and data and indicators are essential for understanding the different needs, priorities, opportunities and barriers that individuals face.

- **Inclusive partnerships, and combining gender-focused actions with mainstreaming**: a twin-track approach is needed, of both implementing programmes dedicated to GE, and mainstreaming GE throughout policies and programming across sectors; mainstreaming should include policy and political dialogue, and paying attention to internal institutional set-up and human resource policies; partnering is essential for implementation.

- **Financial resources drawn from both ODA and other flows**: both the shares and amounts of bilateral ODA for gender equality should be increased; and both dedicated and integrated aid are needed; Private investments with a gender lens, blended finance and other types of financial flows can complement ODA for gender equality.

- **Monitoring and evaluating results build momentum for GE**: Building a body of evidence demonstrating the achievement of gender equality can help increase political will to focus on, and increase investments in this goal; consider adapting performance measurement frameworks and other assessment tools for gender equality results to account for the timelines and the complex nature of change.

- **Institutional set-up:** Gender equality needs to be addressed holistically. Development partners need to set the tone for internal culture: "living" organisational values is essential if those values

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> are to inspire development efforts; build institutions and staffing levels that help all professionals work towards gender equality through incentives and accountability systems.
>
> Source: OECD (2022[10]) Gender Equality and the Empowerment of Women and Girls : Guidance for Development Partners | OECD iLibrary (oecd-ilibrary.org)

OECD Members have demonstrated increased prioritisation of issues relating to violence against women[41]. It is important that governments consider all kinds of violence and have comprehensive approaches, as perpetration of one form of violence often indicates risk of other forms. For instance, high levels of **intimate partner violence**, can suggest that other forms of gender-based violence and sexual harassment are also high in a given country and can therefore be used as a proxy indicator of GBV risk, along with other factors (OECD, 2021[59]). SEAH, IPV, and all forms of VAWG, have the underlying factors of gender inequality and power imbalances. Limitations on providing comprehensive support to victim/survivors of violence should be considered as OECD Members work through different agencies and level of government to stop the perpetuation of VAWG in all its forms, and improve service delivery for victim/survivors. Recent research around integrated service support for victim/survivors of intimate partner violence (OECD, 2023[97]). Based on analysis of policies and approaches by OECD governments provide areas for consideration:

- Integrated service delivery (ISD) for victim/survivors is a critical component of any public policy response to violence. A victim/survivor-centred approach is crucial.

- Governments must adopt a whole-of-state approach to gender equality generally and GBV specifically to promote ISD on the ground. This means ensuring reliable, adequate, and well-organised funding for co-ordinated services. It also requires policy coherence across agencies and levels of government.

- ISD is most frequently introduced at entry points in health care, emergency housing, and police services. These sectors are increasingly interconnected and have linkages to income support, child-related services, and legal assistance. Many of these ISD practices rely on case management, referral systems, and/or physically co-located delivery.

- Data-sharing capabilities across agencies must be strengthened. Data sharing across providers can reduce clients' application costs (in time and energy); reduce the trauma associated with repeating accounts of violence to different providers; and improve client safety by better tracking risks across repeated incidents of violence. Any data sharing strategy must include strong privacy protections to ensure victim/survivors' safety.

- While OECD governments have trialled and implemented a multitude of ISD strategies, especially across the sectors of health, housing, and justice, very few of these programmes have been rigorously evaluated. Better and more regular programme evaluations are essential.

OECD Member efforts and implementation of instruments in related fields of **ethics, such as anti-corruption**, also reinforce efforts in the area of SEAH prevention and response.

Since its adoption in 2016, implementation of the OECD Recommendation of the Council for Development Co-operation Actors on Managing the Risk of Corruption (OECD, 2016[98]). Has progressed (OECD, 2022[99]). This is illustrated by improvements such as: the adoption of institutional frameworks or recommended instruments, such as codes of conduct, ethical guidance, training, and the use of anti-

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[41] Additional OECD guidelines for governments to strengthen their public governance systems, place the needs and experiences of survivor/victims at the centre of all policies and programmes, and improve justice and accountability in order to effectively address GBV: *Eliminating Gender-based Violence: Governance and Survivor/Victim-centred Approaches (2021)* https://doi.org/10.1787/42121347-en

corruption clauses in contracts and agreements. This Recommendation promotes actions by governments to first, address risks of corruption and model integrity in the stewardship of ODA; and secondly, ensure policy coherence by considering actions that can be taken, individually and through concerted actions, at the domestic and international levels, to fight corruption, its drivers, and its enablers. Efforts along these lines also reinforce institutional considerations to end SEAH.

Coherence around SEAH prevention and response activities across the development, humanitarian, and peacekeeping sectors continues to evolve, but remains a challenge. In the multilateral community, the UN[42] has made progress through implementing policies and practices to better align the humanitarian, development and **peace and security** pillars related to combating SEA (UN General Assembly, 2005[100]).

OECD DAC Members have also recognised the need for improving their ways of working across sectors and communities. This is demonstrated by the adoption and ongoing implementation of the 2019 DAC Recommendation on the **Humanitarian-Development-Peace Nexus** (OECD, 2024[101]). This DAC instrument provides a pertinent normative framework, and can support better co-ordination and funding models across these contexts. Lessons learned from implementation of this Recommendation (OECD, 2022[102]) provide insights into challenges and trends in efforts made to address SEAH across the development, humanitarian, and peacebuilding sectors:

- Stakeholders have made significant progress in developing a shared understanding of how to reduce risks and improve resilience at country level, notably through the design of collective outcomes. However, co-ordination challenges remain, and joint analysis and planning must meaningfully translate into development programs.
- New operational practices reflecting the programming principles of the HDP Nexus Recommendation are emerging. Identifying and scaling up good practices requires sustained collective investment in joint learning and evidence. There is little visible progress, however, in strengthening the voice and participation of people affected by crises and fragility.
- Similarly, while the use of nexus-friendly financing models has increased, it is important to learn from these initiatives and integrate them into the humanitarian and development financing architecture in a sustainable manner.

The OECD DAC has also reinforced its models of **co-ordination**, and made stronger commitments to collaborate with **civil society** actors through the adoption of the 2021 DAC Recommendation on Enabling Civil Society in Development Co-operation and Humanitarian Assistance (OECD, 2021[103]). This important commitment reinforces efforts from the bilateral donor community to better support and partner with civil society, and can reinforce efforts in many sectors, including preventing SEAH.

Assessments

> d. *Support the development of measures to jointly assess the performance of multilateral organisations with regard to their approach to SEA and SH, such as those currently under development by the Multilateral Organisation Performance Assessment Network (MOPAN).*

The Multilateral Organisation Performance Assessment Network (MOPAN) has adapted its approach and built on the pillars of the DAC Recommendation on Ending SEAH to integrate SEAH in their assessment frameworks since 2020, through the integration of key performance indicators into its methodology to jointly assess the efforts of multilateral organisations in preventing and responding to SEA and SH (MOPAN, 2021[104]). Support for this method of assessment remains important, and contributes to the harmonisation of efforts across the sector. In an effort to pull additional learnings around SEAH and organisational performance, a synthesis analysis of the results of these first assessments (*forthcoming*) aims to provide

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[42] 2005 UN Strategy in Peacekeeping Operations.

an overview of how far organisations have come, understand what their challenges are, and identify good practice (MOPAN, 2022[105]).

Further information on monitoring of organisation's performance, and MOPAN's criteria and monitoring framework are also referred to under Pillar 6 – Monitoring, evaluation, shared learning, and reporting

Funding and resources

> e. *Dedicate resources – including financial and personnel – to realise the goals of this DAC Recommendation and to ensure that implementing partners can uphold these standards.*

The international architecture around SEAH prevention and response faces certain systemic challenges, including a lack of adequate funding and resources. Governments have many roles and responsibilities in development and humanitarian contexts, with one significant role being that of donors. Multilateral agencies can also act as donors, in addition to their roles as implementing partners.

Further contributions by individual donors, and alignment of donor efforts in SEAH prevention and response, are important. This includes by: dedicating resources to preventing SEAH within their own institutions; investing in capacity of partner organisations to prevent and respond to SEAH; playing a role and providing resources to co-ordination mechanisms at the country-level; and investing in joint projects and initiatives. Sustainable support as well to development programmes that improve the enabling environment for prevention and response is increasingly recognised as vital, not least programmes to end gender-based violence, and certain areas of governance for development work, whether related to participation or voice and accountability for women and girls' agency, or conflict prevention and peacebuilding programming and related political and cultural context analysis.

Table 5.1. What requires funding in SEAH prevention and response?

The list below includes a set of items requiring funding or resource allocation within an organisation's approach to SEAH prevention and response.

Category	Funding item details
Internal investments (within the donor's institution/organisation)	Dedicated SEAH experts/positions in development agencies but also across ministries (MFA, others) Experts in related fields: GBV, CP, gender equality, anti-corruption (These positions are both present in capital/headquarters, and in country delegations/representatives).
	Victims' rights specialist or advocate position
	High-level champion position (ambassador or otherwise)
	Training SEAH investigators (or hire external trained SEAH investigators)
	SEAH-specific trainings for all staff, including trainings for leadership and management skills specifically
	Communications expertise to be able to: target relevant audiences, support awareness-raising activities; and provide information/documentation to all Translation and design services (to be able to communicate in multiple formats, languages, etc.)
	Human resources and legal capacity, specific training on SEAH risk and considerations
	Comprehensive monitoring and evaluation tools/mechanisms (sometimes require external review, or investment in internal expertise to design and implement)

Category	Funding item details
Investments in implementing organisations	Include capacity building for requirements related to SEAH: setting up a SEAH policy, reporting infrastructure, etc. all require expertise, time, resources
	Consider joint capacity building: especially in humanitarian/development contexts, trainings etc. can be conducted for donor staff present in-country, and a range of implementing organisations and other relevant actors present
	Coordination of victim/survivor support
Victim/survivor support services provision	When SEAH is perpetrated within the donor's government or organization (sometimes referred to as SH), dedicated capacity to case management, service provision coordination; and the funding of services themselves, either through internal or external professional capacity (health, psychosocial, legal), respecting international standards on what qualifies as SEAH victim/survivor support *[cross-ref boxes xx]*.
	When SEAH is perpetrated in development/humanitarian contexts, and/or between a donor organisation and external victim/survivor (whether that person in the community, another organisation, etc.): funding for **existing mechanisms and referral pathways** (often **child protection and GBV**); and if **non-existent, funding for the creation of such mechanisms** and the necessary coordination with relevant actors present in these contexts or responsible for providing services.
	Coordination mechanisms necessary to coordinate referral pathways and service provision.
Contribute to coordination mechanisms and key positions	Coordination functions and dedicated positions, for example, PSEA focal points (UN)
	Victims' rights field officers and focal points, office of the victims' rights advocate (OVRA)
Contribute to joint funds	OCHA Fund for investigations into sexual exploitation, abuse, and sexual harassment (IASC, 2019[106])
	Trust Fund in Support of Victims of Sexual Exploitation and Abuse (United Nations, 2022[107])
Contributions to joint initiatives	Projects around information sharing and joint action to stop perpetrators, improve employment practices and investigation capabilities (among others)
	Information-sharing platforms, such as resource hubs
Development finance and programming	Investments in VAW/GBV projects and programs: through targeted ODA
	Investments in creating safer development and humanitarian environments: ODA investments in governance, health, gender equality, other sectors
	Investments that target strengthening rule of law, access to justice, etc.

Donor investments in partner organisations: areas for alignment

SEAH prevention and response frameworks should adapt to the realities of complex partnerships within development and humanitarian contexts. This includes, for example, the relationships between donors and implementing partners, and responsibilities and requirements in relation to SEAH prevention and response.

Some efforts have been made, including agreement between some bilateral donors to align specific language in funding agreements that outlines their requirements and expectations regarding SEAH prevention and response. This includes, for example, bilateral agreements with the United Nations Box 5.3. This aligned approach is also being considered with other kinds of institutions and partnership agreements.

Resource allocations for capacity building in implementing partners should also be included. Implementing partners, and other organisations involved in program delivery, may not yet have the capacity to implement requirements around SEAH, for example, establishing their own policies or organisational action plans on SEAH; specific trainings for staff; or coordination functions with referral mechanisms for SEAH victim/survivors.

The range of sizes of organisations should be taken into account when funding, alongside the reality that many implementing partners may partner themselves with other, third-party organisations, such as through the use local sub-contracted partners, who may also have limited organizational capacity to implement necessary SEAH frameworks and requirements.

Donors can do more to align in deciding what resources and funding are provided to what functions or activities related to SEAH prevention and response in implementing partners. This alignment will contribute to improving consistency and predictability in terms of expectations around donor funding in this field.

Box 5.3. Aligned donor language on SEAH requirements in agreements

OECD DAC Members have made efforts to review and enhance templates and agreements with partners to include SEAH prevention and response. In mid-2019, a group of donors initiated a dialogue on aligned SEAH language to be included in future funding agreements with multilateral partner organizations to develop a harmonized approach to SEAH language. The objectives of this initiative also aimed to indirectly support initiatives such as the UNSG online reporting mechanism, system-wide coherence, and the Funding Compact, and promotes efficiency while reducing administrative pressure.

In 2021, 15 governments agreed to aligned donor language on SEAH requirements in agreements. Extracts below demonstrate examples of agreed requirements: "The Recipient will apply the IASC Six Core Principles Relating to Sexual Exploitation and Abuse (Annex I) and the following principles and practices when implementing the activities under this arrangement and provide evidence to demonstrate this where required:

- Adherence to the IASC-Minimum Operation Standards on "Protection from sexual exploitation and abuse by own personnel" and/or [the] SEA elements of the Core Humanitarian Standard on Quality and Accountability;
- A victim/survivor-centred approach to SEA issues;
- Strong leadership and signalling on tackling SEA;
- Make all reasonable efforts to address gender inequality and other power imbalances;
- Reporting to enhance accountability and transparency;
- Ensure that SEA standards from this arrangement are reflected in funding templates with implementing partners, [for UN entities: by means such as, but not limited to, adherence to the United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners]."

And for sexual harassment, **"**the Recipient will apply the following principles and practices when implementing the activities under this arrangement: A victim/survivor-centred approach to SH issues; Strong leadership and signalling on tackling SH; Make all reasonable efforts to address gender inequality and other power imbalances; and Reporting to enhance accountability and transparency."

This includes harmonisation around the following principles:

- Zero tolerance for inaction approach to tackling sexual exploitation and abuse ("SEA") for both the Recipient and Donor. This means the Recipient and its implementing partners will take all reasonable steps to prevent SEA (…). Zero tolerance for inaction approach to tackling sexual harassment ("SH") for both the Recipient and Donor. This means the Recipient will take all reasonable steps to prevent SH and respond appropriately when reports of SH arise (…).
- Adhesion by the recipient to requirements of reporting all allegations of SEA, SH and measures taken through existing reporting mechanisms.
- Taking reasonable, swift, safe, and appropriate action when the Recipient becomes aware of reasonable suspicions, complaints or reports of SEA or SH by its personnel.
- Carrying out reviews or evaluations or other assessment measures to verify the Recipient's zero tolerance for SEA and SH by the Donor or any of its duly authorized representatives. Protection of sensitive information, ensure the safety and security of persons and respect the due process rights of all involved by the Donor.

Supporting joint initiatives and coordination functions

Joint funds are one model of organising resources towards a specific objective; a number of funds exist to provide greater support within SEAH prevention and response. This includes the OCHA Fund for investigations into sexual exploitation, abuse, and sexual harassment (IASC, 2019[106]) the Trust Fund in Support of Victims of Sexual Exploitation and Abuse (United Nations, 2022[107]), and the Interagency Community Outreach and Communications Fund on PSEA, under the UNHCR High Commissioner's IASC Championship on PSEA (IASC, 2020[108]). However, these remain limited in size, and not always flexible or nimble enough to meet demand and/or needs.

Initiatives around SEAH prevention and response can be scaled up through collaboration, including funding, where they show promise. For example, donors have pooled resources across initiatives such as the CHS Alliance Investigation Qualification Training Scheme (see Table 3.4 for more information). Initiatives such as those around employment accountability (see Box 3.6 for an example), and information-sharing hubs (see Box 4.10).

The complexity around SEAH prevention and response necessitates coordination across actors, including but not limited to, humanitarian and development contexts. Coordination is essential for effective SEAH prevention and response for many reasons: better coordination can also create potential efficiencies in the system, leading to less transaction time, which frees up resources.

The availability of sustainable funding for **co-ordination functions** around SEAH prevention and response continues to be challenging in countries. PSEA Coordinators, for example, serve as independent inter-agency coordination functions in many humanitarian contexts, and which have defined roles and responsibilities[43]. These positions operate through the UN coordination structure in country, and also coordinate and cooperate with other organisations, government, and civil society at different levels[44]. The need for a PSEA Coordinator is not limited to emergencies, as the minimum standards on PSEA and leadership responsibilities are the same in development, peace, and humanitarian contexts.

There remains room for greater contributions and alignment of funding for co-ordination functions around SEAH prevention and response in countries. Although individual organisations have deployed interagency PSEA coordinators in some contexts, coordination gaps persist.

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[43] IASC external review: *the concept of a PSEA Coordinator established in every RC/HC office, with a well-functioning, inclusive and resourced PSEA Network and supported by the HCT through the HRP, or other means, should be maintained.*

[44] The full-time independent inter-agency PSEA Coordinator role is a relatively new position, as endorsed by the Inter-agency Standing Committee (IASC) Principals in the 2016 Global Standard Operating Procedures on Inter-agency Cooperation in Community-Based Complaint Mechanisms ("Global SOPs") and reinforced in the 2018 IASC Plan for Accelerating PSEA in Humanitarian Response at Country Level ("IASC Acceleration Plan") that calls for a dedicated PSEA Coordinator in all humanitarian contexts. The need for a Coordinator is not limited to emergencies, as the minimum standards on PSEA and leadership responsibilities are the same in development, peace, and humanitarian contexts. A dedicated and independent PSEA Coordinator has been found critical to support and create momentum for the inter-agency PSEA program at the country level. The standardized responsibilities of the PSEA Coordinator are outlined in the Generic PSEA Coordinator TORs (2019). A global Training for PSEA Coordinators based on these TORs is available as part of IOM's PSEA Coordinator capacity building activities.

These challenges remain in part due to lack of funding, contracting and retention issues, and a mismatch between the skills available and the experience needed[45]. More sustainable funding would not only improve coordination, especially in SEAH high risk or priority contexts, but also provide more security for these posts long-term. This also contributes to better and more effective coordination at the country level, as those holding these posts can focus on building relationships and trust that enable delivery at country level. Identifying and understanding high risk or priority contexts at country-level can help prioritise limited resources and support.

To respond to these challenges, the IASC have pulled together an initiative to create a roster of PSEA coordinators (see as well Box 5.4).

Box 5.4. Reinforcing coordination at country-level: the importance of funding and resources

Coordination between actors at country-level includes, in some contexts, the presence of a PSEA coordinator or focal point. Some actors have advocated for further provision of such capacity.

PSEA coordinators, identifying high risk contexts and resource allocation prioritisation / Roster

In order to identify a mechanism with the capacity to meet identified needs, the IASC Champion in consultation with the IASC Secretariat analysed the capacity of 8 organisations/structures including Standby Partnerships with current rostering and other support capabilities across 16 criteria using a simple points system; This included subjective and objective criteria which was triangulated with a variety of stakeholders, and included frank exchanges around the realities of operations. Following, the three most credible and practical partner organisations are engaged in detailed capacity, budget and governance discussions, which led to the options below.

The IASC requires a PSEA Coordinator administrative & funding mechanism:

- Easily identified, owned, and trusted by all IASC members and is consistently championed by all IASC Principals;
- Trusted by donors to deliver impact, and can therefore secure sustainable, predictable funding on an ongoing basis; provides a single, simple inter-agency governance/decision-making structure, can support deployments of a minimum 24-month duration to at least 15 contexts as identified using the new SEA-RO PSEA risk index as a primary guide;
- Able to provide a service as contract manager with duty of care and operational support to postholders; and
- Can provide Talent Pool Management capabilities (on-going identification, succession planning, performance management).

In order to meet immediate gaps, UNFPA have continued their excellent work selecting a new pool of candidates to be rostered at the P4 and P5 level.

Source: IASC & SCHR (2022[109]; 2022[110]) ProCap and GenCap Appeal for 2023-2024 and SCHR PSEAH Championship Priorities

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[45] Reflections offered under the SCHR IASC Champion on SEA.

Creating safer environments through development finance

More attention to how broader investments made in development and humanitarian contexts is important, including funding and resources in areas relating to SEAH; and the environments and contexts within which SEAH is perpetrated.

Official development assistance (ODA) remains an important resource in development and humanitarian contexts. Donors should consider how SEAH is integrated or targeted through ODA and other development finance instruments.

Targeted flows to VAWG projects are tracked through the DAC Creditor Reporting System, but these remain low Box 5.5. Greater investments in VAW and GBV systems are important. Funding of service provision through child protection and GBV systems is especially important in the area of support to SEAH victim/survivors Pillar 2 – Develop or support survivor- and victim-centred response and support mechanisms.

Investments in these environments should target not only SEAH prevention and response directly, but also those underlying factors that contribute to higher risk environments. This includes, importantly, how gender equality is supported or not through development assistance Box 1.1. In 2020-21, the overall share of total ODA that has gender equality as a policy objective dropped slightly; and support to programmes dedicated to gender equality and women's empowerment as the *principal* objective amounted to only 4% of total bilateral aid. Donors should intensify their efforts to direct more financial resources for gender equality and the empowerment of women and girls in partner countries.

Development programming and investments in related fields should also be considered and targeted: those relating to ethics and anti-corruption, including for example, how investments seeking to reinforce rule of law and access to justice. SEAH prevention and risks should also be integrated into development and humanitarian programming decisions in relevant sectors such health and governance.

Box 5.5. Official development assistance for Ending Violence Against Women and Girls, and Gender Equality

Violence against women and girls

Official development assistance is tracked in terms of support towards **ending violence against women and girls**. DAC members committed **USD 563 million** on average per year in 2021-22 to ending violence against women and girls, less than 1% of their total ODA. Canada, the United Kingdom, the EU Institutions and Germany were the top providers of ODA to end violence against women and girls in 2021-2022, each committing more than USD 50 million on average per year.

Figure 5.1. ODA to end violence against women and girls

Top 15 DAC members(average 2021-22)
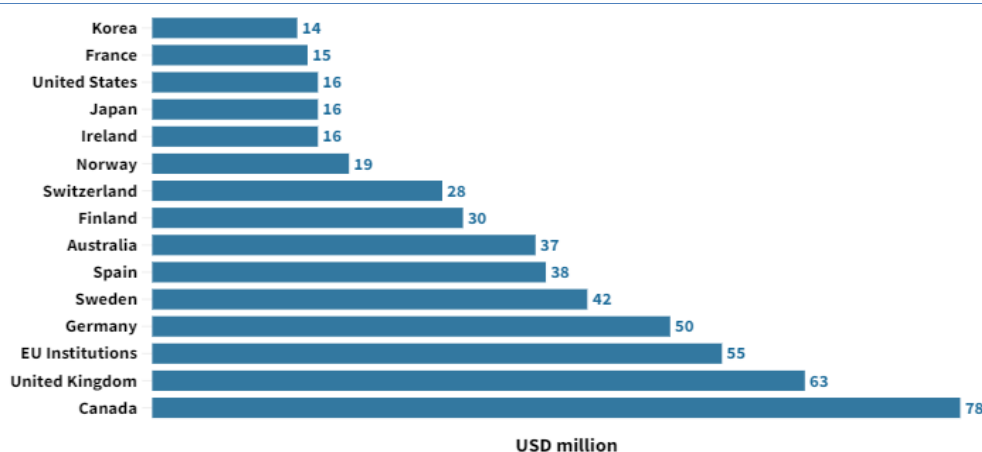
Note: Bilateral allocable ODA. Based on commitments to code 15180 "Ending violence against women and girls", that exists since 2015.
Source :OECD (2024[111]) Creditor Reporting System (Database), https://stats.oecd.org/Index.aspx?DataSetCode=CRS1
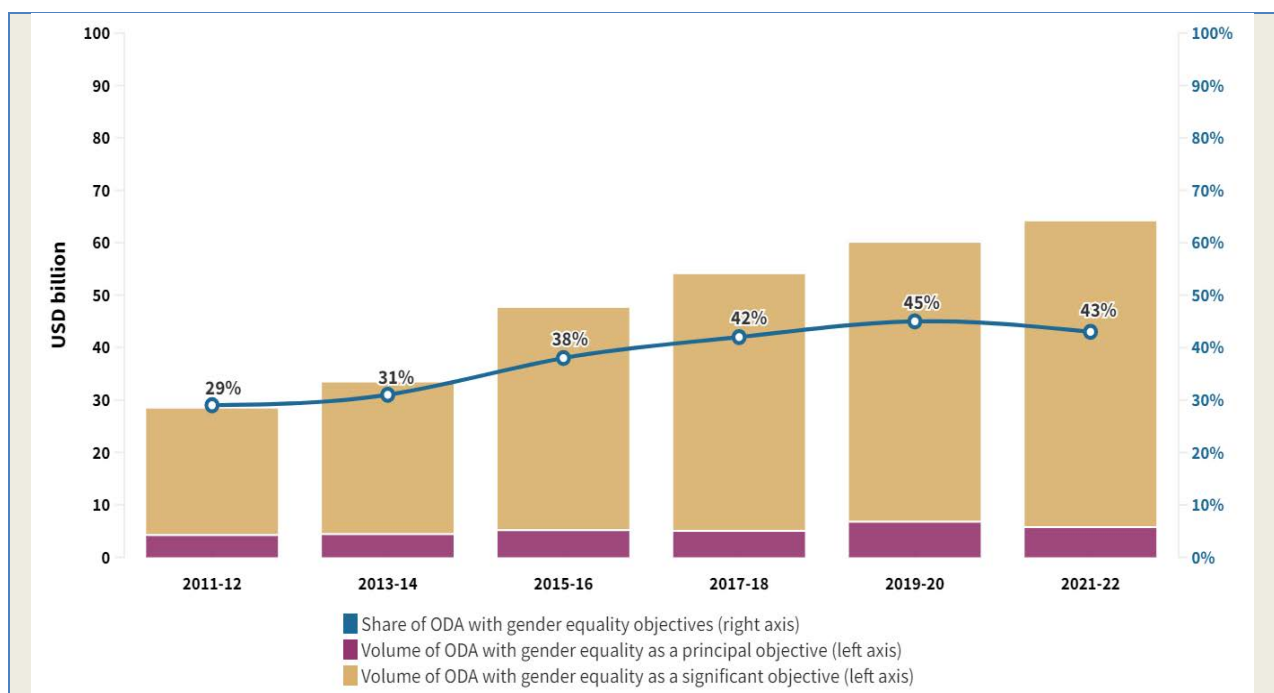
Gender equality

The volume of ODA for gender equality and women's empowerment increased from USD 60 billion per year on average in the period 2019-20 to 64.1 USD billion in 2021-22. This rise is in line with the increase of ODA overall in the same period, as DAC members stepped up their aid for partner countries grappling with the COVID-19 crisis. While volume of ODA remains at a historical high level, the share of total ODA[46] that has gender equality as a policy objective **dropped from 44% in 2020-21 to 43% in 2021-22**. This signals a need for DAC members to intensify their efforts to direct more financial resources for gender equality and the empowerment of women and girls in partner countries.

The bulk of ODA with gender equality objectives was for programmes that integrate gender equality as one **significant** policy objective amongst others: **USD 58.3 billion** (39% of total bilateral aid). Only **4%** of total bilateral aid was dedicated to programmes with gender equality as the **principal** objective, a similar share from the previous period.

Figure 5.2. Bilateral development finance for GE by DAC members (2011-2022)

Volume and share of bilateral allocable Official Development Assistance (ODA) that has gender equality and women's empowerment as principal and significant policy objective, from 2011 to 2022, Constant 2021 prices

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[46] Refers to bilateral allocable ODA that has been examined against the gender marker. DAC members examined over 93% of their bilateral allocable ODA against the marker in 2021.

Note: Gender-focused includes both principal and significant.
Source: OECD (2024[111]) Creditor Reporting System (Database), https://stats.oecd.org/Index.aspx?DataSetCode=CRS1

Source: OECD (2024[112]) Development finance for gender equality and women's empowerment, https://www.oecd.org/dac/financing-sustainable-development/development-finance-topics/development-finance-for-gender-equality-and-women-s-empowerment.htm.

Checklist on Pillar 5

DAC Members can ask the following questions:

On upholding international standards and co-ordination

- Are your institution's policies based on international commitments, including relevant OECD and DAC Recommendations, the Core Humanitarian Standard on Quality and Accountability (CHS), and the Inter-Agency Standing Committee Minimum Operating Standards (MOS-PSEA)?

- Have efforts been made to better coordinate across the bilateral donor community? This includes to set clear standards and expectations, align existing measures to the extent possible, and respond to survivors' and victims' needs?

- Have efforts been taken to support coordination measures in-country, including those relating to victim/survivor support and assistance?

- Have efforts been made to reach out to broader stakeholders, including local organisations, including women's rights organisations and movements?

- Have resources been dedicated and efforts been made to improve coordination across international stakeholders? Including the UN, specifically the Inter-Agency Standing Committee (IASC); and the UN System Chief Executives Board for Coordination (CEB)?

- Are assessment measures to assess the performance of multilateral organisations' approach to SEAH (such as by MOPAN) supported?

On funding and resources:

- Have resources (financial and personnel) been dedicated to realise the goals of the DAC Recommendation? This includes supporting stronger policies and institutional frameworks both internally and through partnerships.

- Have resources been dedicated to support implementing partners in upholding standards? And in fulfilling requirements related to SEAH prevention and response?

- Have resources (financial and personnel) been dedicated to SEAH capacity in headquarters and in country offices? And have efforts been made to reach out to other relevant experts?

- Have resources been dedicated to survivor/victim support?

- Have resource and budgeting decisions on SEAH prevention and response been linked to broader decisions around investments? This includes through official development assistance.

- Have contributions to joint initiatives and funds been considered?

6 Pillar 6 – Monitoring, evaluation, shared learning, and reporting

Monitoring and evaluating SEAH prevention and response

As per the DAC Recommendation:

> *6a. Establish mechanisms for monitoring and reviewing responses, support, and follow-up, such as independent progress and impact assessments, evaluations, or review mechanisms on best practices and lessons learned, and common definitions.*

Why is monitoring & evaluation important?

Policies and processes around SEAH prevention and response should not only exist, but they also need to be effectively implemented, lead to change, and have a positive impact[47]. Currently, there is a lack of available information related to how well existing systems are working. Monitoring and Evaluation (M&E) can help demonstrate this, or point to where goals are not being met.

Monitoring is defined as:

> *"A continuing process that involves the systematic collection or collation of data (on specified indicators or other types of information). Provides the management and other stakeholders of an intervention with indications of the extent of implementation progress, achievement of intended results, occurrence of unintended results, use of allocated funds and other important intervention and context-related information." (OECD, 2022[113]).*

Monitoring is a continuous management and measurement function to assess progress towards achieving expected results, to spot bottlenecks in implementation, and embed a flexible approach when rolling out a programme or project and its activities. When successfully carried out, results monitoring and management highlight whether there are any unintended effects (positive or negative) from a specific programme and its activities and allows for constant iteration and the possibility to change course if the results are not as expected.

Evaluation complements results monitoring, providing deeper insight to underlying drivers of effects, by answering questions about the relevance, coherence, effectiveness, efficiency, impact, and sustainability of interventions Box 6.1. Evaluation, however, often occurs less frequently and explores questions such as how results are achieved, who is benefiting or whether gains can be expected to last. Evaluation is defined as:

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[47] Discussion of how to define a "positive impact" in SEAH prevention and response (and difficulties around this) is addressed later in this chapter.

> *"The systematic and objective assessment of a planned, ongoing or completed intervention, its design, implementation and results. The aim is to determine relevance, coherence, effectiveness, efficiency, impact and sustainability.*
>
> *Evaluation also refers to the process of determining the worth or significance of an intervention. An evaluation should provide information that is credible and useful, enabling the incorporation of lessons learned into decision-making processes.*
>
> *Evaluation in some instances involves the definition of appropriate standards and criteria, the examination of performance against those standards, an assessment of actual and expected results and the identification of relevant lessons and recommendations. Though evaluation deals with the assessment of relevance, coherence, effectiveness, efficiency, impact and sustainability, not all evaluations will cover all of these criteria to the same degree or at all." (OECD, 2022[113])*

Evaluation is targeted and complements monitoring by determining the outcomes (the short and medium-term effects of the intervention) and impacts (the positive and negative, primary, and secondary longer-term effects produced by an intervention, directly or indirectly, intended, or unintended). Evaluation criteria and additional key references are set out in Box 6.1 below.

It is important that monitoring & evaluation is integrated into an organisation's approach to ending SEAH. It should be factored into an agency's work from the outset, and appropriately resourced. Monitoring should be a continuous process that provides early indications of progress in SEAH prevention and response systems. Setting up effective monitoring and learning plans can help professionals working on development co-operation design interventions that can be corrected in a timely and responsive manner. Monitoring also supports donors and other actors to better measure whether systems in place deliver the expected results.

Currently, M&E is not being incorporated systematically into SEAH prevention and response efforts. Each policy, strategy, and mechanism should be accompanied by a monitoring mechanism and evaluated periodically. Integrating monitoring and evaluation can help track the relevance, effectiveness, and efficiency of SEAH policies and systems; and also of interventions specifically targeting SEAH. The use of M&E in relation to efforts to combat SEAH can contribute to programmes running efficiently and actors and stakeholders being accountable for the results of their activities. Moreover, M&E can play a crucial role in correcting aspects of SEAH response systems, so that they better meet their objectives.

SEAH prevention and response results should be monitored and evaluated at all levels. This will capture progress both at headquarters as well as in operations. And ultimately, sector-wide progress becomes more visible when monitoring information is aggregated globally.

However, recognising that institutions have different levels of available resources, and in order to design a fit-for-purpose model, organisations can consider a "right size" approach to monitoring, reporting and evaluation activities. Institutions can focus on where information is most useful and valuable for different purposes (learning, accountability etc.).

This section provides information on monitoring and evaluation of organisational or institutional measures and systems. Some of the approaches covered herein also provide lessons that may be translated into country and programme level progress. It also looks at potential or emerging mechanisms that provide opportunities for global monitoring.

Box 6.1. OECD DAC Evaluation: essential references and tools

The OECD DAC has defined **six evaluation criteria** to guide development partners. The evaluation criteria's purpose is to support consistent, high-quality evaluation within a common framework. These criteria can be applied to evaluating SEAH systems and interventions.

The criteria can also be used in processes beyond evaluation, including defining frameworks and indicators for monitoring and results management, funding approval, strategic planning, and intervention design, particularly to improve future interventions. Collectively, there is value in having commonly defined criteria that are similarly applied across interventions. The criteria also provide a consistent language across the development field, providing standardisation and allowing for comparison and learning across interventions. Each of the six criteria is summarised by a broad question, which illustrates its overall meaning:

- **Relevance**: Is the intervention doing the right things?
- **Coherence**: How well does the intervention fit?
- **Effectiveness**: Is the intervention achieving its objectives?
- **Efficiency**: How well are resources being used?
- **Impact**: What difference does the intervention make?
- **Sustainability**: Will the benefits last?

The *Glossary of Key Terms in Evaluation and Results-Based Management for Sustainable Development (Second Edition)* (OECD, 2023[114]) provides conceptual clarity to support thoughtful approaches to results-based management, monitoring, and evaluation. This glossary is useful for training and in practical work on sustainable development in the public and private sectors – including during project or policy design, monitoring, programme implementation and management, and various types of evaluation. Definitions have also been adjusted to reflect their current use by a range of actors in diverse contexts of work on sustainable development, including within communities.

Additional guidance is included in the ***Applying Evaluation Criteria Thoughtfully*** (OECD, 2021[115]), including on applying a gender lens: "Evaluators should work in ways that thoughtfully consider differential experiences and impacts by gender, and the way they interact with other forms of discrimination in a specific context (e.g., age, race and ethnicity, social status). Regardless of the intervention, evaluators should consider how power dynamics based on gender intersect and interact with other forms of discrimination to affect the intervention's implementation and results. This may involve exploring how the political economy and socio-cultural context of efforts influence delivery and the achievement of objectives."

The OECD DAC first laid out five evaluation criteria in 1991 (OECD, 1991[116]) and provided definitions in 2002 (OECD, 2002[117]). These five criteria – relevance, effectiveness, efficiency, impact and sustainability – have become a common reference point for evaluators in development co-operation and beyond. Prompted by a desire to respond to the 2030 Agenda for Sustainable Development and the opportunity to draw on extensive experience and learning, a wide-ranging consultation and adaptation process was undertaken and the DAC endorsed revised criteria definitions in 2019 (OECD, 2019[118]). The DAC Network on Development Evaluation (EvalNet) provided these updated criteria, drawing on nearly three decades of learning by members along with the wider global evaluation community.

Levels of monitoring and review in SEAH prevention and response

When establishing monitoring and evaluation systems, it is important to follow established guidelines, such as on protection of persons involved in evaluation (OECD, 2022[120]), and DAC quality standards around ethical principles and evaluation (OECD, 2010[121]).

Monitoring of specific mechanisms related to SEAH prevention and response can contribute to raising visibility, providing a basis for accountability and assessments to support updates, revisions and better outcomes. Throughout this section, monitoring and evaluation can be referred to on multiple levels in systems relating to SEAH prevention and response. This includes monitoring and evaluation of:

1. **Institutional monitoring (internal and external)** of individual bilateral and multilateral agencies, or civil society organisations to respond to and prevent SEAH (this includes, an institution's SEAH policies, codes of conduct, partnership, and funding agreements; as well as reporting systems and complaints mechanisms, investigation capacity, etc.)

2. **Monitoring of multi-stakeholder or coordinated systems** used by bilateral agencies and multilateral or civil society organisations to respond to and prevent SEAH. These are often shared with other partners at country level (for example: referral systems or assistance/support provisions used to support SEAH victim/survivors, coordination mechanisms between actors, etc.)

3. **System-wide performance monitoring** of progress in SEAH prevention and response. Such mechanisms draw on the monitoring information produced by each agency or organisation, to provide an overview of SEAH efforts in the development and humanitarian sector. This information tells the stakeholders of these organisations where the sector is meeting collective benchmarks, identify good practice, and point to areas where improvements have to be made.

Additional consideration should be taken into account in terms of monitoring and evaluating:

4. **Monitoring of relevant (development and humanitarian) programmes and projects** that impact SEAH prevention and response, and the context within which SEAH occurs.
   a. Agencies should monitor their programmes and projects targeting SEAH; and those targeting GBV and VAWG;
   b. Agencies should monitor and evaluate their programmes that impact the environment within which SEAH occurs through key sectors such as governance, health, anti-corruption, gender equality, and other programs that contribute to addressing the risk factors present in the environments within which SEAH is perpetrated.

Agency or Institution-specific monitoring and review

Monitoring and evaluation of individual institutions' efforts can take the form of *internal* M&E mechanisms (for ex: a bilateral aid agency or a UN agency's own M&E processes used to evaluate their own policies, etc.); or monitoring by *external entities* (such as the OECD monitoring implementation of the DAC Recommendation by individual DAC Members, or MOPAN monitoring the performance of individual multilateral organisations, among others).

It is important that all institutions, whether *bilateral donors/governments*, *multilateral organisations* (with the role of both multilateral donor and/or implementing partners), and other kinds of implementing partners or actors, such as *civil society organisations*, have monitoring and evaluation systems in place to assess

their institutional mechanisms for SEAH prevention and response. Internal mechanisms including SEAH policies, codes of conduct, reporting systems and complaints mechanisms, investigation capacity, victim/survivor assistance, etc.

For DAC members or bilateral donor governments, evaluation of all development policies and systems should be established (OECD, 2010[121]) (Box 6.1) including in the field of SEAH prevention and response. Governments choose to use internal or external capacity to monitor and evaluate their internal systems and efforts. The reports or assessments from these mechanisms are not always shared publicly.

For some governments, institutional monitoring may also feed into requirements to report to a wider reaching governmental body (that oversees development or humanitarian activities, for example), or a parliamentary oversight function.

It is important that M&E of individual donors (whether bilateral or multilateral) should also include consideration of / M&E of their implementing partners' efforts on SEAH prevention and response. M&E can also be included as a requirement around SEAH prevention and response activities required by donors (when these are included in partnership or funding agreements); or M&E can be a required activity in the reporting of implementing partners to donors. Connecting these systems requires more research and collection of experiences.

DAC Peer Reviews monitor progress of implementation of all DAC instruments[48] by individual DAC Members, including the DAC Recommendation on Ending SEAH. However, the DAC Peer Review follows a 5-6 year cycle for each DAC Members, meaning that information collected through this process is regular but well-spaced out[49], and the information gathered remains at a high level.

The monitoring process included with the DAC Recommendation on Ending SEAH collects information on individual Members' efforts, and thus provides an opportunity for DAC Members to assess their own efforts and identify areas for potential changes. This monitoring process allows for collective learning.

Multilateral agencies or organisations also establish their own monitoring and evaluation of their policies and systems. In some instances, these evaluations are shared more publicly. For example, evaluations of UNHCR policies and procedures on the prevention of SEAH from 2018-2019 were published as part of broader commitments through the UNHCR Evaluation Policy to "_support accountability, learning and continual improvement through the systematic examination and analysis of organisational strategies, policies, and programmes._" This review covered both headquarters and a number of country contexts. Since this review, UNHCR has updated several of its institutional policies and strategies (UNHCR, 2019[122]).

UN agencies funds and programmes monitoring, and review processes also feed into reporting requirements to their boards and the UN SG system-wide report (see paragraph below).

Institutional monitoring should also include efforts at the field level, or by country offices, if applicable for certain implementing partners or multilateral organisations. For example, in the UN system, there are however important opportunities for agency-specific monitoring to become better anchored. The UN is a

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[48] The DAC Peer reviews' methodology includes: "peer reviews are a key tool for the DAC to monitor members' adherence to OECD and DAC Recommendations and other instruments" and recognises the role of DAC policy networks in this process and the full list of Peer reviews.

[49] It is important to take into account the fast-changing environment and constantly evolving field of SEAH prevention and response internationally. As such, 5-6 years is a significant amount of time between monitoring individual government's efforts – both through the DAC peer review (much higher level) or the 5-year monitoring mark of the DAC Recommendation.

point in case, where RCs/HCs and heads agencies are required to submit their Action Plans, and where it could be imaginable to require agencies to also submit their monitoring against that action plan.

External monitoring of multilateral institutions on SEAH prevention and response also has been established. The Multilateral Organisation Performance Assessment Network (MOPAN) assess the performance of individual multilateral organisations on a number of issues; these assessments and its accompanying indicator framework are distinguished from other mechanisms as they are part of an external, independent, third-party assessment, commissioned jointly by the MOPAN member states. MOPAN has integrated indicators to measure and monitor performance on SEAH. Within MOPAN methodology, these are situated within the organisational performance area, rather than the results area, as they focus on the presence and application of policy and procedures regarding SEA and SH. The MOPAN SEA/SH indicators are closely aligned with the DAC Recommendation on Ending SEAH, the MOS-PSEA of the IASC, and other existing norms and best practice[50] (Box 6.2).

For _civil society organisations_, mechanisms should also be set up to assess internal policies and procedures.

CSOs may use external review mechanisms such as HQAI to measure performance against standards (in this case the CHS). In some instances, this review is included as a requirement by donors. The CHS Alliance have developed further tools for supporting monitoring and review processes, such as the CHS index and handbook also provide guidelines for defining organisational results.

Multi-stakeholder system monitoring and review

Monitoring the effectiveness of systems where multiple stakeholders are involved is not always straightforward. This can include, for example, M&E of coordination systems for SEA prevention and response (in country for example); or M&E of multi-stakeholder referral systems and SEA victim/survivor assistance at the country level.

In the GBV prevention and response, for example, specific monitoring and evaluation mechanisms have been established to assess the coordination aspects of a humanitarian response (as opposed to the overall services delivered as part of the humanitarian response). Monitoring and evaluation of the GBV sub-cluster's performance may be done through Cluster Coordination Performance Monitoring (CCPM), which is a self-assessment (with humanitarian leadership initiating this process). (GBV AoR, 2019[123]).

The role of PSEA coordinators can not only support system-wide performance monitoring at the country level/in the field (see paragraph below on IASC), but also support such joint monitoring mechanisms for such systems.

System-wide performance monitoring and review

Analysing collective progress, whether between groups of similar institutions, or across certain sectors, can be valuable. It allows stakeholders to understand where the sector is meeting collective benchmarks, to identify good practice, and to point to areas where improvements should be made.

Mechanisms to monitor system-wide performance draw from the monitoring information produced by individual agencies or organisations. However, currently, even when organisations that monitor or evaluate their own progress, this is often kept internal, or not shared more widely.

In terms of _government_ efforts, the monitoring mechanism for the DAC Recommendation on Ending SEAH is a key tool in monitoring collective trends across the bilateral aid community. The DAC Recommendation

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[50] Multiple assessments including SEA/SH indicators had been conducted. All assessments can be accessed on MOPAN's website.

itself includes a requirement for the production of a monitoring report to the DAC five years after adoption (for 2024). This will allow an opportunity for monitoring of individual Members' efforts of implementation, along with trends within the community[51]. At the mid-point, an Interim Progress Report of implementation of the DAC Recommendation on Ending SEAH was produced (in 2021), pointing to key trends (OECD, 2021[124]) across the DAC membership, both in areas where additional attention is needed, and where some progress against the pillars of the DAC Recommendation had been made. This Interim exercise helped support DAC members by identifying areas where members would benefit from more time dedicated to learning and exchange, and where additional resources and/or political support was needed.

Within the *multilateral system* – specifically the *UN* – the annual UN SG report on SEA[52] provides a source for monitoring UN system-wide progress, but rarely disaggregates performance reporting. This report collects information from individual Agencies, Funds and Programmes, who report progress on SEA and SH to their Boards; and an annual certification letter to the UN SG provides assurance that SEA allegations have been reported through the UN SG's mechanism and handled appropriately, and that PSEA training was offered. However, more detailed monitoring information is usually not included; and these letters are not publicly available. For the UN, no comparable joint annual reporting mechanism exists for SH, which is addressed by the UN Office of Human Resources and the Sexual Harassment Task Force of the UN Chief Executives Board, beyond the statistical data on disciplinary actions taken by agencies against personnel (including cases of SH).

The IASC External Review was an Important exercise in assessing sector-wide or so-called "global" progress, and provided insights for improvements in collective efforts.

Monitoring collective efforts at country level is also important, and increased commitments have been made, for example: the IASC in its 2022-2026 PSEA Strategy, has committed to better monitor collective efforts at the country level and to ensure the needed capacity to meet them. As such, the IASC is undertaking a mapping exercise to track collective progress using agreed core indicators; PSEA Coordinators support the HC and HCT, as well as the wider humanitarian community in reporting against these indicators (IASC, 2022[125]). The IASC has also set up other tools, such as the PSEA Global Dashboard that tracks progress against IASC commitments in humanitarian response. The objectives include both collective, inter-agency progress, as well as country-specific progress, and supports country-level tracking of results, focusing on the field[53].

MOPAN has evolved into a hub where information around progress across the multilateral system is collected, published, and analysed. The first six MOPAN assessments to include an assessment of SEA and SH based on the 16 indicators presented above were published in 2021[54]. This has allowed MOPAN to begin monitoring sector-wide progress (Box 6.2). While these initial assessments focused on the UN

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[51] The DAC Recommendation: "*VIII. INSTRUCTS the DAC Network on Gender Equality to: c. Report thereon to the DAC no later than five years following the adoption of this DAC Recommendation and at least every ten years thereafter.*"

[52] UN Secretary-General's reports: https://www.un.org/preventing-sexual-exploitation-and-abuse/content/secretary-generalsreports.

[53] The IASC PSEA Global Dashboard tracks inter-agency, collective progress among all countries with HRP/RRP or similar on accelerating PSEA, based on IASC commitments and priority areas. The global chart serves as an aggregated and longitudinal analysis of 33 IASC humanitarian countries from 2019 to 2021 while the country dashboards track data and progress across 41 countries with humanitarian response, including some development settings. The aim is to strengthen a global IASC community of practice on PSEA, through knowledge management and country-level tracking of results that focuses on the field. https://psea.interagencystandingcommittee.org/dashboard.

[54] Around twelve more organisations will be assessed until 2024, allowing for more information to be accumulated.

system specifically, other multilateral organisations will undergo MOPAN assessments and provide further learning.

Monitoring impact of development/humanitarian programs

M&E should be included in all development and humanitarian programming. This includes of those programs that directly target SEAH, or integrate objectives related to SEAH prevention and response; as well as those programs closely related: programs targeting GBV or integrating objectives related to GBV and/or VAWG.

More efforts should be made to evaluate programs that contribute to addressing the risk factors that are present in the environments within which SEAH is perpetrated. For example, programs targeting anti-corruption (present in SEAH high risk environments); or programs targeting stronger governance, rule of law (both not present in SEAH high risk environments) or those programs that target access to justice for those people in vulnerable situations specifically (barriers present in SEAH high risk environments); or targeted more comprehensive health services, including for women and girls and those in vulnerable situations (also not present in SEAH high risk situations); or programs in child protection that take into account access to services and accompanied (both necessary in SEAH high risk situations).

Box 6.2. Identifying patterns in multilateral organisations' performance: lessons from MOPAN assessments

MOPAN benchmarks on SEA and SH were applied for the first time in the assessments of: International Labour Organization (ILO), Office for the Coordination of Humanitarian Affairs (OCHA), United Nations Development Programme (UNDP), United Nations Environment Programme (UNEP), United Nations Children's Fund (UNICEF), and United Nations Office for Project Services (UNOPS).

Synthesis analysis from these six monitoring exercises point to a number of patterns or trends:

Common patterns for sexual exploitation and abuse and sexual harassment

- All meet the criterion of organisational policies, action plan or code of conduct on PSEAH;
- All have mandatory training in place for both SEA and SH as preventive measures, with good evidence of completion rates.
- Having dedicated resources and structures, especially at field level, is a difficulty in both areas. Only two of the agencies had some dedicated resources at both HQ and field levels.

Patterns specific to sexual exploitation and abuse

- Agencies do well in transparently reporting allegations every year, due to the common system instituted by the UN SG annual reporting on special measures to tackle SEA.
- There are large differences in organisations' due diligence in vetting implementing partners and building their capacity to protect from SEA; but some good practice is emerging.
- The requirement to co-ordinate among agencies is particularly highlighted for SEA. In practice, the involvement in such initiatives is linked to organisations' mandates and obligations, and to common systems such as UN Clear Check or UN SG annual reporting on SEA. Organisations tend to engage more easily in inter-agency initiatives at headquarters rather than field level. Such inter-agency co-operation and synergies are however crucial in light of the nature of SEA, and of resource constraints.

- A major weakness across all organisations is tracking the implementation of their SEA abuse policies and risk management. While all track the number of and response to allegations, they do little to monitor the actual progress against organisational policies and action plans.

- Adopting a victim-centred approach remains an area of challenge. Aside from commitments, most organisations were unable to demonstrate tangible action.

Patterns specific to sexual harassment

- Ensuring that complaints of SH are handled in a timely manner is an area of attention with only 1-2 organisations leading the way. This requires significant investment to be able to better respond to misconduct.

- While public reporting on SEA is advanced in the UN system, public reporting on SH is poorly co-ordinated, which means that organisations fare differently. Some take it upon themselves to report publicly whereas others choose to keep matters internal.

- Progress across the board is needed on benchmarks relating to the responsibility of organisations to set up multiple structures to directly receive and respond to complaints of SH..

- More effort is needed to regularly track the implementation of policy, especially at field level.

Source: MOPAN (2022[126]) Brief: Progress on SEAH? From words to deeds

Drawing lessons on M&E across sectors

When evaluating efforts in SEAH prevention and response, lessons can be drawn from the field of gender equality, as well as from experience monitoring and evaluating other areas of violence and abuse, and the promotion of fundamental human rights, and security of persons, among others[55].

For example in the field of **GBV** prevention and response, the IASC GBV AoR has established guidelines and learning around monitoring and evaluation (both on individual institutional and cross-sector levels) (GBV AoR, 2019[127]). Established Guidance in the field also considers indicators and frameworks, and how to apply them in different humanitarian contexts or types of institutions (IASC, 2015[2]).

Other actors have also drawn from expertise in GBV to extend across areas with sexual harassment, and build indicator frameworks. For example, the IFC, European Bank for Reconstruction and Development (EBRD), and CDC Group have developed guidance for addressing GBV and Sexual Harassment across sectors; including examples of key performance indicators (KPI) that institutions could use in order to track the effectiveness of efforts to prevent and respond to GBVH. This set of indicators was designed to be able to be adapted to different institutions, to ensure they are appropriate both to the local context and institutional operations (IFC, 2020[128]).

Monitoring and evaluation should also be sensitive to a number of **intersecting inequalities**, which can be underlying factors for the perpetration of SEAH. This includes gender equality, an important consideration in its own right, but also in the approach taken to monitoring and evaluation of efforts surrounding the promotion of gender equality and empowerment of women and girls. The impact of SEAH on particular groups of people, including those in vulnerable situations, should also be taken into account when analysing underlying factors for the perpetuation of SEAH Pillar 2 – Develop or support survivor- and victim-centred response and support mechanisms. This includes the consideration of specific factors, such as those with disabilities. Many challenges associated with monitoring and evaluating **gender equality** results have become more apparent in recent years, – particularly **transformative change** related to

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[55] Further guidance on applying a human rights approach to evaluation: https://doi.org/10.1787/9aaf2f98-en.

shifting power relations and changing norms, and the view of what counts as "evidence" of change. As tools and guidance on gender-sensitive or responsive monitoring and evaluation have increased, the need for indicators and methodologies better able to capture long-term change and transformational gender equality results is acknowledged widely.

These shifts in norms and culture are also necessary for ending SEAH; monitoring and evaluation should be adapted to consider how to define this transformational change.

Defining results and indicators

The difficulty in defining results of effective SEAH prevention and response

There is no one established notion of the "results" of an *effective* or *successful* system of SEAH prevention and response. However, in order to assess the effectiveness and impact of such systems, these results should be defined.

Current monitoring assessments, for example MOPAN,

Table 6.2. MOPAN Indicators for SH, recognise that results have not been agreed upon by the international community, and therefore takes the approach of measuring whether a policy exists, and how far organisations have come in implementing them; but stops short of monitoring results or effectiveness of such policies (MOPAN, 2021[104]).

The DAC Recommendation itself refers to *ending* SEAH; referring to the ultimate goal or result: to eliminate the perpetration of SEAH in all its forms, or zero occurrences of SEAH. However, given the complexity of the environments within which SEAH is perpetrated, and the systemic nature of abuse, there are realistically intermediary steps or prerequisites that will likely be reached before achieving this ultimate objective. Progress, even if only incremental, should still be measured. Defining what is evidence of or what is demonstrative of progress or "positive" steps towards this objective, is challenging.

Even if the objective is to ultimately stop all abuse from occurring, positive results *cannot* be indicated by zero **SEAH cases** reported. As reiterated and drawing from established practice around GBV M&E, the number of reported cases (either increase or decrease) as an indicator of success (IASC, 2015[50]). When an organisation receives zero cases of abuse, this does not necessarily indicate that SEAH is not being perpetrated. Reporting systems may be in place, but they may not be trusted; victim/survivors may decide to not come forward and report for a variety of personal and societal reasons, or because the organisational culture does not create a supportive environment for victims/survivors to come forward. No cases may indicate that the systems in place are not working or are not sufficient; and that there is a need to address the environmental, social, or other factors impeding victim/survivors.

Another challenging issue is the need to assess the changes in **organisational culture** necessary to support progress on SEAH prevention and response. Monitoring of values or culture can be difficult. By their very nature, an organisation's overarching values may be broad and conceptual, or defined in a broad/conceptual way. Some of the values may be more easily susceptible to quantitative assessment, but others will be more difficult to measure, and a more qualitative approach may need to be taken. In cases where the values themselves may not be quantifiable, the implications or manifestations of these values – or how they show up on a day-to-day basis – may be measured and monitored. (…) Monitoring an organisation's culture in relation to SEAH should therefore involve a range of tools including internal staff engagement surveys, specific "pulse" surveys, focus groups, regular interviews, and exit interviews in addition to utilising quantitative sources of data such as reports and outcomes, staff turnover, sickness and grievance figures, disciplinary numbers and compensation adjustments, and complaints. A combination of these resources will be needed to gain an assessment of progress towards the cultural objectives of an organisation.

A well-formulated 'Theory of Change' that can help articulate the ways specific SEAH prevention and response activities are meant to contribute to positive outcomes, and can be tested by gathering data on results (OECD, 2022[10]).[56] [57]

Indicators and assessment frameworks

When establishing a monitoring mechanism for SEAH prevention and response, indicators can be used to measure progress. Examples of such indicator frameworks, which can also be applied in different contexts and institutions are included in the tables below.

Table 6.1. IASC Core Indicators for PSEA

The IASC PSEA Core Indicators outlined below are based on the IASC PSEA, Acceleration Plan and the minimum PSEA actions in the UNCT/HCT PSEA Action Plan. They build upon the work that UNICEF has carried out on behalf of the IASC since 2019 to track progress on PSEA and to support its acceleration across the humanitarian response.

Output	Indicators	
Outcome 1. Prevention. All staff and related personnel know the standards of conduct for protection from SEA and understand their personal and managerial/command responsibilities to address SEA and other misconduct		
1.1 Personnel understand the standards of conduct on the protection from SEA	1.1a Number and percentage of personnel deployed, including those short-term and those visiting the country complete mandatory training on PSEA that includes clear guidance on where and how to report allegations of misconduct.	1.1.a The purpose of this indicator is to measure both the number and percentage of staff deployed in the field who are informed on SEA-related misconduct regulations and are provided with updated information on where and how to report if experiencing or witnessing the occurrence of SEA.
Outcome 2. Safe and Accessible Reporting.		
2.1. Safe, accessible, child-sensitive mechanisms are in place for reporting sexual exploitation and abuse, particularly in high-risk areas.	2.1. A Safe, accessible, child-sensitive mechanisms are in place for reporting SEA, particularly in high-risk areas.	2.1. A This indicator aims at measuring the level of coordination among PSEA network members on the mechanisms that ensure safe, accessible and child and gender-sensitive reporting and assistance to SEA victims/survivors.
	2.1.C. Number and percentage of children and adults who have access to a safe and accessible channel to report sexual exploitation and abuse by personnel who provide assistance to affected populations.	2.1. C Ensuring the provision of safe and accessible reporting channels for SEA is a priority for the IASC. This indicator measures the estimated number and percentage of people who can reasonably access at least one SEA reporting/complaint channel within the country.
	2.1.D. Percentage of allegations reported to the PSEA Network per month and responded to within seven days.	2.1. D All UN entities are required to report SEA allegations in-country to the Resident Coordinator. Many interagency PSEA Networks under the overall leadership of the RC/HC have SOPs in place that provide for aggregate reporting of SEA allegations to the PSEA Coordinator, on behalf of the RC/HC. This indicator is intended to promote the increased effectiveness of SEA reporting channels, in order to ensure that any reported allegations are promptly responded to. Responsiveness to SEA allegations builds trust and promotes greater accountability. Maintaining awareness of SEA allegations in-country is important for SEA risk monitoring and ensuring reporting channels are effectively working. By tracking on this indicator, PSEA networks

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[56] Further explanations on defining a Theory of Change can be found: OECD (2022), *Gender Equality and the Empowerment of Women and Girls: Guidance for Development Partners*, OECD Publishing, Paris, https://doi.org/10.1787/0bddfa8f-en.

[57] Specific examples of theories of change in SEAH prevention and response; for an overall strategy, in the UK, the Safeguarding strategy is based on Theory of Change. UK strategy: safeguarding against sexual exploitation and abuse and sexual harassment within the aid sector - GOV.UK (www.gov.uk); and another example in Project Soteria, see page 3 of the 2022 Annual Review for Project Soteria, https://devtracker.fcdo.gov.uk/projects/GB-GOV-1-300784/documents.

		will be able to monitor how reactive and responsive to allegations are.
2.2. Community mobilization, consultation and awareness-raising on PSEA in each community receiving and/or affected by UN assistance. Where there is an HC/HCT this would apply to all humanitarian partners.	2.2.A. Number of sites where awareness raising campaigns/activities on how to report SEA and how to access victim/survivor-centred assistance have been reached annually.	2.2.A The purpose of this indicator is to monitor the coverage of awareness raising campaigns and activities on PSEA. All sites where humanitarian assistance is provided to targeted populations should have information about PSEA, including how to report SEA and receive assistance.
	2.2.B. Number of children and adults engaged through awareness-raising activities and community mobilisation interventions on PSEA.	2.2.B This indicator is measuring the number of people engaged through activities that raise awareness and promote the involvement and engagement of communities on PSEA. It is particularly important to reach to and listen to perceptions and preferences of most vulnerable groups in the communities such as children, adolescent girls and boys, people living with disabilities, single mothers and female heads of households and LGTBQ+.

Outcome 3. Victim's right to assistance.

3.1. SEA victim/survivor assistance is provided through GBV or CP programming which is familiar with SEA and specific needs of victims/survivors.	3.1.C. Number and percentage of SEA victims/survivors who have been promptly referred to SEA victim assistance, as part of ongoing GBV and CP programming or in line with existing service mappings.	The purpose of this indicator is to measure the number and proportion of survivors/victims21 that have come forward, given consent and have been referred to specific services according to their wishes and needs. The indicator supports monitoring of referrals.
	3.1.E. Percentage of required funding/resources for assistance to GBV victims/survivors at the response plans/ appeals that is available.	Under the overall goal of providing evidence on the increased availability of safe, timely and accessible services for victims/survivors of SEA, the purpose of this indicator is to measure the availability of funds/resources to cover GBV programming/services needs within the Humanitarian Response Plan (HRP).
3.2. PSEA Networks have referral pathways for victim/survivor assistance in place, as part of an integrated approach with GBV services	3.2.A. Status of implementation of the UN Victims' Assistance Protocol by the PSEA Network, including SOPs for referral and provision of services for SEA survivors.	The purpose of this indicator is to measure how advanced the status of implementation of the UN Victims' Assistance Protocol, including SOPs for referral and provision of services for SEA is. It is important that PSEA Network coordinates with GBV/CP Coordinators and SOPs should be built on existing GBV/CP referral pathways and mappings carried out by other UN or humanitarian agencies, in particular GBV and Child Protection AoR to avoid duplication and creating increased burden on service providers.

Outcome 4. Accountability and Investigations

4.1. PSEA Networks adopt, implement and track progress against uniformed protocols/guidelines for prompt, safe and victim/survivor-centred assistance during investigations at country-level.	4.1.A. Number and percentage of PSEA Network members have personnel trained on SEA guidelines and protocols for victim/survivor-centred investigations.	The purpose of this indicator is to ensure that UNCT/HCT members, PSEA Network members adopt, implement and track progress against uniformed protocols/guidelines for prompt, safe and victim/survivor-centred assistance during investigations at the country-level through training of their personnel.
4.2. SEA victims/survivors informed of and/or supported in relation to investigations and accountability processes.	4.2.A. Percentage of victims/survivors who are informed of the outcome of the investigations.	The purpose of this indicator is to ensure that sexual exploitation and abuse victims/survivors are informed of and/or supported to participate in relevant accountability processes, including investigation.
4.3. When working with implementing partners, adequate safeguards are in place and action is taken related to sexual exploitation	4.3.A. Percentage of implementing partners assessed as having medium or full capacity based on UN Implementing Partner PSEA Capacity Assessment.	The purpose of this indicator is to assess the implementing partners' organizational capacities on PSEA

and abuse – e.g., screening, co-operative arrangements, monitoring, and termination of arrangements.		

Source: (IASC, UNICEF, 2023[129])

Table 6.2. MOPAN Indicators for SH

MOPAN's assessments of multilateral organisations' performance. The table below includes excerpts for those indicators applying to stopping sexual harassment.

Indicator	Evidence source
2.1. Organisation specific dedicated policy and/or codes of conduct addressing SH are available, aligned to international standards and applicable to all categories of personnel.	Document review: Available policies and action/ implementation plans, organisation-specific policy, UN: Annual Action Plan (submitted to the SG).
2.2. Mechanisms are in place to regularly track the status of SH policy implementation at HQ and at field levels.	Document review: Independent reviews of progress in addressing SH, independent expert reviews. Headquarters interviews: Evidence of uptake and implementation (e.g. Human resources lead, SH focal point, programme staff, partner liaison). Field staff interviews: Enquire about policy implementation at country or regional levels. Go beyond HR and towards administrative, junior grades and national staff and staff unions, etc.
2.3. The organisation has a holistic mechanism in place to support the implementation of its SH policy, with clearly identified roles and structures.	Document review: Check available policies, action/ implementation plans, risk registers, management letters, gender policies/ strategies for SH to find roles/responsibilities. Budget documents (provisions for personnel with full or partial responsibility for SH prevention/response). Independent reviews of progress on addressing SH. Headquarters interviews: Probe for evidence of clear responsibilities in implementation at HQ (e.g. HR lead, SH or joint SEAH focal point, programme staff, etc.). Interviews with field offices: Include enquiry into a holistic approach to implementation at headquarters (Human resources lead, SH or joint SEA/SH focal point, programme staff, etc.) and support to SH capacity at country or regional levels
2.4. The organisation has resources in place for implementing its SH policy/guidelines at headquarters and in the field.	Document review: Budget documents (provisions for personnel with full or partial responsibility related to SH prevention/response; and their operational budget).
2.5. The organisation has clearly identifiable support channels in place for SH victims and clear responsibilities for following up with them, and a body that co-ordinates the response.	Document review: Services available to (all) personnel and affected individuals; check available policies and action or implementation plans, risk registers, management letters, gender policies/strategies, as well as budgets to find roles/ responsibilities, and services available to (all) personnel and individuals affected by SH. Headquarters interviews: Evidence of clear responsibilities in implementation at headquarters (e.g. HR lead, SH or joint SEA/SH focal point, programme staff, etc.). Interviews with field offices: Include enquiry into capacity to support on SH matters at country or regional levels and to determine service uptake and quality.
2.6. All managers have received training on preventing and responding to SH, and all staff has been trained to set behavioural expectations (including on SH).	Document review: Training modules and materials, annual report on training delivered, action plans, management letters, risk register (mitigation), and staff survey. Interviews (field and headquarters) to verify the provision, uptake and effectiveness of training.
2.7. Several mechanisms can be accessed to seek advice, pursue informal resolution, or formally report allegations of SH	Document review: Complaint mechanisms in place (e.g. website, ethics office report, ombudsman's office report, SG Annex 1), review of staff perception study/survey, informational brochures, etc. Headquarters and field interviews: Evidence that formal and informal reporting channels are used.
2.8. The organisation ensures that it acts in a timely manner on formal complaints of SH allegations.	Documentary evidence: Includes reporting by the ombudsman's office, ethics office, staff surveys, etc. Interviews can provide information on timeliness (average number of days for response, and efforts to improve timeliness). Document review: Reporting and publications by the ombudsman's office the ethics office. Interviews: Timeliness (average number of days for response, efforts to improve timeliness). Staff surveys, if available.
2.9. The organisation transparently reports	Document review: Annual compendium of disciplinary measures (UN Office of Human Resources),

Indicator	Evidence source
the number and nature of actions taken in annual reporting.	Annual Disciplinary Reports (for non-UN organisations), Annual report to the Executive Board (UN funds and programmes), or equivalent.
3.1. Accountabilities and responsibilities for protecting from SEA and SH are clearly allocated in the organisation's management; leadership is held to account	Document review: Policies and action/implementation plans, organisation-specific policy; terms of reference for senior managers; corporate communications to staff on SEA/SH, etc. Interviews with staff and management
3.2. Organisational culture supports protection from SEA and SH	Document review: Corporate messages, communications, annual self-assessment on implementing the UN System-Wide Action Plan for Gender Equality. Interviews with staff and management.
3.3. Policies and measures are in place and are being applied to protect whistle-blowers and individuals who report, from retaliation.	Document review (or establish in interviews if needed). Headquarters and field interviews/surveys: Do staff trust these policies/protection mechanisms? Interviews with whistle-blowers: how have they been protected against retaliation? Independent staff surveys: does staff feel protected against retaliation if they disclose SEAH cases?
3.4. The organisation prevents the hiring of candidates with a history of prohibited conduct	Document review: Documentary evidence on the use of candidate screening applications can be found in annual reports to the Executive Board/GA or equivalent and in annual disciplinary reports (usually internal) if available. Regarding ClearCheck implementation: the list of participating Mos is included in the Fact sheet on the SG's initiatives to prevent and respond to SEA Section II: Transparency, accountability and ending impunity, item no. 10

Source: (MOPAN, 2021[130])SEAH Note.pdf (mopanonline.org)

Indicators in relation to SEAH should also be designed, where possible, so they can be incorporated into existing sectoral M&E tools and processes, in order to improve information collection and analysis without the need for additional data collection mechanisms. Actors should select indicators and set appropriate targets prior to the start of an activity and adjust them to meet the needs of the target population as the project progresses. Some indicators require a mix of qualitative and quantitative data to better understand the quality and effectiveness of programmes (IASC, 2015[50]).

More research and analysis is needed to determine definitions of positive results in SEAH prevention and response; and appropriate indicators for governments and other actors. Coordination is important in this area, as comparability across indicators means that comparability around assessments of organisational performance.

Additional details on examples of other frameworks including indicators can be found in Box 6.9 below (MOPAN and SEARO Indexes).

Improving data in SEAH prevention and response

As per the DAC Recommendation:

> *6b. Improve data, including sex- and age-disaggregated data, qualitative and quantitative measures, and assessments and evaluations of agencies and partners' initiatives that ensure confidentiality for survivors, victims and vulnerable groups. These efforts could include disaggregating data to be able to use it across organisations, locations, and time to learn and detect trends that would inform gaps in all the other areas.*

Data collection methodology, availability, and quality of data

Data are the backbone of all development and humanitarian programmes, as they provide the essential basis for understanding the practicalities of the development process, the interactions, and feedbacks between different systems, and the factors that should shape decisions. They also support identifying the reasons beyond differential rates of progress, and the impact of policies and systems. Relevant, timely and usable data are essential for countries and institutions to be able to set priorities, make informed choices, and implement better policies. (OECD, 2021[131])

Data and statistics should inform the design and analysis of SEAH prevention and response policies and systems, and help assess the environment within which SEAH may occur. It is also important to use data to inform decision-making and prevent unintended harms of programs or policy decisions, which could include SEAH.

For example, by collecting data before and after a policy is put in place, organisations and governments can determine whether their interventions are having the desired effect. This information can be used to make necessary adjustments to the policy, or to develop new strategies to address any remaining issues. It can also be used to inform budgetary decisions, or advocate for greater resources.

In the past, data related to SEAH (including case data) was virtually never shared or reported, unless a particular organisation or case garnered public attention and was put under pressure. In the past few years, organisations have increased their efforts to collect data around SEAH, but there is no standard approach and data remains varied and incomparable. In addition, this data is reported inconsistently and very rarely shared publicly (not including detailed case management data, which remains confidential) (CHS Alliance, 2022[132])

Research has shown that there is a lack of a standardised approach to the data collection, reporting, and management of cases on SEA, whether reporting of allegations and cases of SEA by organisations, which can be internal to their Board or other internal reports) or external (accountability reports, specific reports to donors, etc.). Different organisations may use internal databases, methods that are automated, spreadsheets or filling systems. Beyond individual institutional systems, there are a few existing systems for reporting that are used, such as UN iReport. Reporting to boards on a regular basis has become more common, and some agencies have started to include information about SEA and safeguarding on their websites; and some organisations publish individual reports. (CHS Alliance, 2023[133]).

Data collection

There are many methods and tools that can be used for data collection and analysis, which can be adapted based on the context and purpose. Table 6.3 below provides an overview.

Table 6.3. Techniques for data collection and analysis

Approach/tool	Considerations for data collection and analysis
Focus groups	Focus groups can encourage women and girls to express their views more openly than through conventional survey methods. Focus groups also provide opportunities for dialogue on gender equality and enable evaluation processes to contribute to changes in attitudes about gender. The inclusion of local evaluation consultants and advice from evaluation reference groups are important strategies to adopt.
Interviews	Special attention should be paid to including in the programmes women and girls who may have been forgotten or left out of discussions and decision making, but who may have insights related to the context and the evaluation questions.
Surveys	Surveys are commonly used to collect information on experiences of stakeholders in a programme or project. Feminist survey design experts have advocated for survey questions to avoid perpetuating negative gender-related social norms and to model positive norms in designing survey questions.
Case studies	Case studies can be particularly helpful for highlighting the experiences of women and girls to understand the effects of a particular programme or intervention. Case studies by definition are context-specific and allow a detailed narrative to emerge about how a programme has been experienced by stakeholders. Case studies, combined with participatory analysis, can be empowering, as they allow individual women or girls to understand and interpret their own situation.
Most Significant Change	The Most Significant Change (MSC) methodology is widely used for collecting stories of lived experiences and allowing the storytellers to select stories representative of the type of change being sought. Project stakeholders are involved in deciding the kind of change to be recorded and analysing data.

Approach/tool	Considerations for data collection and analysis
Outcome Mapping	As a planning, monitoring and evaluation approach, Outcome Mapping (OM) unpacks an initiative's theory of change, provides a framework to collect data on immediate, basic changes that lead to longer, more transformative change, and allows for the plausible assessment of the initiative's contribution to results.
Outcome Harvesting	Outcome Harvesting (OH) is designed to collect evidence of change (the "outcomes") and then to work backwards to assess whether or how an organisation, programme or project contributed to that change. This contrasts with the more traditional way of carrying out monitoring and evaluation, which is to start with activities and then attempt to trace changes forward through output, outcome and then impact levels. Women's rights organisations are experimenting with OH as an approach that is consistent with feminist monitoring and evaluation.
Participatory mapping	Participatory mapping refers to a spectrum of data collection tools that can be used for collecting women and girls' spatial access and knowledge of different resources, freedom of movement, and how this is affected by different relations within communities. The use of interactive, fun, and engaging techniques facilitates an exploration of sensitive issues around differences in access and control over resources amongst different women, in a non-threatening manner.
Participatory visual storytelling	Participatory visual storytelling includes a variety of participatory tools aimed at transformative change embedded in action research. It empowers participants in telling their life story, as well as other experiences, through photography or video, as a basis for stimulating social change. Examples include PhotoVoice and participatory video, to help make women and girls' voices central in explaining empowerment and other processes of change from their perspective.
Evaluative rubrics	Evaluative rubrics set out criteria and standards for different levels of performance and describe what performance would look like at each level. These frameworks can be developed from the programme logic and developed in a participatory way by evaluators with programme stakeholders. Rubrics offer a process to make explicit the judgements in an evaluation and are used to judge the quality, the value or the importance of the service provided. Rubrics are made up of: • evaluative criteria: the aspects of performance the evaluation focuses on • merit determination: the definitions of what performance looks like at each level.

Note: This table is adapted from guidance provided on human rights and gender equality data collection and evaluation approaches in the UN Evaluation Group 2014 and the below sources.
Source: (Newton, Eerdewijk and F. Wong, 2019[134]), *What do participatory approaches have to offer to the measurement of empowerment of women and girls?,* https://www.kit.nl/wp-content/uploads/2019/03/KIT-Working-Paper_final.pdf; (Oakden, 2013[135]), Evaluation rubrics: how to ensure transparent and clear assessment that respects diverse lines of evidence, https://www.betterevaluation.org/sites/default/files/Evaluation%20rubrics.pdf; (Better Evaluation, 2014[136]), Photo Voice, https://www.betterevaluation.org/en/evaluation-options/photovoice.

Box 6.3. Empowered Aid: lessons on participatory action research and data collection

The approach to data collection should be adapted to different contexts, and also to the subject at hand. When considering SEAH prevention and response, there are a number of particularly sensitive and strategic factors, which impact how data should be collected. Lessons from research in the field of SEA prevention, and gathering information from Uganda and Lebanon provide important reflections.

The Global Women's Institute Empowered Aid project is focused on prevention of SEA, focusing on pro-active measures to mitigate risk and prevent abuse from occurring. Shared power with refugee women and girls, their communities, and emerging women researchers from some of the largest refugee-hosting countries in the world, to ensure prevention of SEA is led by those most affected by it.

Participatory, feminist, and anthropological approaches

Participatory action research is *a method that proactively acknowledges and addresses power imbalances between the affected population and researchers/humanitarians, and was grounded in formative ethnographic work with refugee women and girls, to safely take an active role in asking and*

answering questions about their own lives (The Global Women's Institute, 2020[137]). Applying participatory, feminist, and anthropological methods in gender-based violence research can hold researchers accountable to both acknowledging and explicitly addressing these power disparities. Applying these approaches throughout the research process takes time – to build trust and share stories rather than 'extract' data, to engage in collective meaning-making with those whose lived experiences are a form of expertise, and to consider how knowledge is represented and with whom it is shared. (Alina Potts, 2022[138]).

This approach recognises women and girls as contextual safeguarding experts and engages them as co-producers of knowledge, supported to safely take an active role in asking and answering questions about their own lives.

Data collection and methods

The project took a series of activities employing different methods on data collection:

1. "**Participatory group discussions**" (PGDs): focus group discussions that employ participatory activities throughout, focused on the challenges people who are refugees face when accessing different types of aid; which challenges present the most difficulty for women and girls, and how they respond when faced with violence.

2. **Semi-structured qualitative interviews** (Qis); refugee women and girls carried out structured observations around each type of aid (from among those they selected at the PAR workshops), and met one-on-one with a NGO staff member of the team approximately every two weeks to share their observations.

3. "Participatory group discussion #2: methods used here include *community mapping*, to identify risks and safe/unsafe places in their communities, and *body mapping*, to reflect on their participation in the study; also includes a short *questionnaire* to collect basic demographic information.

4. **Reflection workshops** were held with staff, women, and girls so that they could step back and reflect on the process, as well as provide the staff-research team with inputs and feedback to improve data collection for the rest of the project.

5. **Key informant interviews** (KIIs) with community leaders, service providers and other humanitarian personnel.

All activities were segregated by age, meaning women and girls were always in separate groups. To solicit input from other members of the refugee, host, and humanitarian community, PGDs were held with refugee men, boys; refugee women and girls identified as belonging to particularly vulnerable groups, including those living with disabilities; and host community women, girls, men and boys.

The Participation action research Toolkit (The Global Women's Institute, 2020[139]) provides templates for **consent forms** for different activities (including explanation of the risks, benefits, eligibility, confidentiality, etc.), and guidelines for **interviews**, whether in groups or individually.

Background

Empowered Aid is led by the Global Women's Institute at the George Washington University, in partnership with local and international aid actors, as well as affected communities in refugee-hosting countries around the world. Since 2018, Empowered Aid has conducted rigorous and participatory research on the ways that aid (including food, non-food items, shelter, water, fuel, cash & vouchers) may increase risks of SEA within affected populations, and how to reduce those risks.

There is a lack of common agreement on exactly what should be reported in incidents of harm and abuse. Some institutions have developed individual guidance materials, but this may lack exactly what incidents and what detail should be reported (CHS Alliance, 2023[133]). A harmonised approach to data collection and the criteria has potential benefits to increase comparability across the sector, and support learning and targeting of interventions. One example of such a harmonised approach is the SEAH Harmonised Reporting Scheme, with the potential for learning and detecting trends (Box 6.4).The full framework for the Harmonised Reporting Scheme can be found on the CHS Alliance website (CHS Alliance, 2023[133]).

Considerations around data collection and sharing will have particular constraints, depending on their intended purpose and further use.

Some donors require that partner or implementing organisations sharing data on SEAH incidents, through reporting. There are certain kinds of data that is valuable for sharing among different institutions (including between partners and donors). In some instances, this information may also be shared publicly to support transparency. Confidentiality and privacy should be taken into consideration, some information should not be shared outside of the organisation. When appropriate, information sharing between organisations can support the identification of trends through aggregated data, and allows for institutions to better understand challenges and risks beyond their own individual experience. However, in order to be able to conduct joint analysis, it is important that organisations are able to collect comparable SEAH data. This provides a comparable, understandable basis for sharing information between actors. In response, a harmonised data collection framework has been proposed by certain entities, including joint reporting mechanisms. Lessons can also be learned from established practice around data collection and sharing in the field of gender-based violence.

For example, when considering data sharing in relation to survivor/victim assistance should prompt a number of reflections:

- How can data be collected and protected?

  The collection and use of victim/survivor data should be done safely and ethically to reinforce prevention and response systems. Record keeping and all information sharing regarding SEAH responses must adhere to the "do no harm" and confidentiality principles. Data security and safeguarding, paramount in every context is especial crucial here.

- What data are shared among actors (and which actors are these?) regarding the victim/survivor? What happens when victim/survivors do not want data to be shared?

  The use of data and privacy protections, and relevant international standards, are important. International co-ordination is needed to facilitate a consistent approach to how organisations and actors deal with data.

Better data collection can improve accountability and transparency by providing a basis for public reporting and oversight. By making data on SEAH policies publicly available, organisations and governments can demonstrate their commitment to addressing these issues and can provide a mechanism for stakeholders to hold them accountable for their actions. It can also help to build trust and confidence among stakeholders.

While transparency is crucial for better accountability, cases and data concerning SEAH require confidentiality. Just as it is necessary to conduct anonymous surveys, it is also crucial to preserve the anonymity of the data, especially in small organizations and projects. Indeed, when disaggregating data into several subcategories, it is sometimes possible to cross-check and establish correlations, which could

eventually put one or more victim/survivors at risk. Therefore, it may be necessary to keep some level of opacity in some specific cases as it could do more harm than good.

Data reporting and sharing have different requirements depending on the organisation, and agreements between partners.

Box 6.4. Demonstrating potential learning through use of a harmonised approach to SEAH data collection and reporting

The objective of proposing a harmonised framework is to increase transparency and accountability on SEAH. A harmonised reporting scheme for organisations can support trend analyses and effective learning from aggregated data; and can in turn inform policies and strategies. Through the piloting phase of a proposed [harmonised framework](#) (infographic 6.1), data on SEAH incidents were reported by 24 organisations (11 international NGOs, 9 local NGOs, 1 Red Cross Red Crescent organisation, and 4 private sector organisations), a total of 133 incidents of SEAH.

While this cannot be considered as representative of sector-wide SEAH trends or of the total incidence or prevalence of SEAH, this scheme and analysis contributes to identifying key trends and potentially similar patterns across contexts and actors. This project provides initial indications and demonstrates the potential learnings that can be achieved through trend analysis in SEAH prevention and response.

The scheme produced a number of takeaways, which provide insights to areas for strengthened action or policy changes. For example:

- **Typology of incidents**, and **profile of victim/survivors**: The majority of the reported incidents are sexual harassment (41%), followed by sexual exploitation (29%) and sexual abuse (26%). Males accounted for 91% of alleged perpetrators and females for 9%. The majority of victim/survivors are female (84%) whereas males account for 4% of incidents. The majority of victims/survivors are 18 or above (in 64% of incidents), whereas victims/survivors were under 18 in 19% of incidents. The number of victim/survivors under 18 highlights the importance of **strengthening child safeguarding policies** and ensure risk mitigation, prevention and response measures specific to the needs of children are taken.

- **Alleged perpetrator profile**: the majority of incidents were allegedly perpetrated by national staff (75%). In 12% of incidents, the status of the perpetrator was unknown. International staff accounts for 13% of alleged perpetrators. Considering the ratios between national staff and international staff in most organisations (i.e. international staff rarely represents more than 10% of personnel) the percentage of incidents perpetrated by international staff is alarmingly high.

- **Assistance to the victim/survivor** was rendered in half of the incidents, with mental health and psychosocial support (MHPSS) accounting for the vast majority of assistance provided (27%), followed by medical assistance (8%), legal assistance (5%), economic assistance (4%), physical protection (4%) and other (3%). The fact that half of the victims/survivors did not have access to assistance emphasises the importance of improving outcomes for victims/survivors. If victims/survivors do not have access to support and do not see outcomes when they report, under-reporting will continue to stay high as reporting will be seen as a burden or risk, as opposed to a way to access justice and support.

Note: The SEAH harmonised data collection and reporting scheme is an initiative led by the CHS Alliance and the Steering Committee for Humanitarian Response (SCHR), supported financially by the Foreign Commonwealth Development Fund (FCDO). Recognising the importance of data privacy and protections, this initiative is also accompanied by a Data Protection Protocol, ensuring multiple levels of security.

Box 6.5. Lessons from GBV information management – Gender-Based Violence Information Sharing System (GBVIMS)

Reliable data is crucial to informing the humanitarian response to GBV. The Gender-Based Violence Information Sharing System (GBVIMS) is a data management system that enables those providing services to GBV survivors to effectively and safely collect, store, analyse, and share data related to the reported incidents of GBV. It responds to a need to have a coordinated and aligned approach across actors to collection, management, and sharing of GBV-related data generated through service delivery. This includes numerous tools:

- Intake and Consent Form,
- Incident Classification System,
- Incident Recorder; and
- GBV Information Sharing Protocol template, ensuring that GBV data be shared confidentially and compiled and analysed in a format that ensures survivor anonymity and the safety and security of all involved.

The system is based on the following best practices:

- GBV individual case data should not be gathered in situations where services to survivors are not available; services must be available to GBV survivors if data is going to be gathered from them
- GBV survivors' confidentiality must be protected, and survivors must formally consent for their information to be shared
- GBV intake forms should not be shared outside of the context of referral
- GBV data should be kept securely in locked cabinets, with passwords to protect files and only shared on a need-to-know basis

- GBV data sharing protocols or agreements should be in place between organizations that share GBV data, which explains how data is shared with whom, and for what purposes.

The IASC guidelines for GBV in humanitarian emergencies are an important reference point, can provide insights applicable to the field of SEAH prevention and response. The Inter-Agency GBV Case Management Guidelines and the GBV Case Management Capacity Building Initiative provides further insights.

The GBVIMS was originally launched in 2006 by UNOCHA, UNHCR, and the IRC; and the GBVIMS Steering Committee now consists of UNFPA, UNICEF, UNHCR, IRC and IMC. It has now been implementing in over 20 countries for nearly 10 years.

Source: GBVIMS (2021[142]) Intake and Consent Forms, https://www.gbvims.com/gbvims-tools/intake-form/

The importance of sex-disaggregated data in monitoring SEAH

The collection and analysis of sex-disaggregated data is an important step in effectively monitoring SEAH as it can reveal inequalities and disparities, but also highlight unequal treatment or outcomes based on gender. "We can only fix what we know but the reality is what we know is often limited by the data we have and the level of disaggregation of this data" (Chair & Rodriguez, 2020). Data must be as diverse as possible to represent every single person.

Certain groups of women are also disproportionately affected by SEAH such as the youth, migrant women, women in wage and salaried work and persons affected by discrimination. (ILO, 2022), as well as girls, youth, older women, and women with disabilities. Gathering sex-disaggregated data but also disaggregated data on other identity factors (age, ethnicity, religion, etc.) can help to expose systemic inequalities and address them through tailored interventions. Examples of intersectional approaches can be found in Box 6.6, Box 6.7 and Box 6.8.

Different forms of data collection, in terms of SEAH cases, should be considered. There are numerous barriers to that can impede the collection of information on SEAH victims/survivors [Pillars 2and 3]. Surveys and interviews must take into account barriers that may prevent people from disclosing SEAH incidents to optimize data collection with anonymous and adapted questions. Statistical tools such as data weighting and non-response adjustments can also be used to improve data quality.

Box 6.6. Switzerland: Taking steps towards monitoring intersectional inequalities

In the **Swiss Agency for Development and Cooperation** (SDC), a unit has been created to focus on gender and social equality. This has led to joint efforts to identify the interlinkages between gender equality and "Leave No One Behind" (LNOB), and an emphasis on intersectionality. SDC introduced a new set of reference indicators for monitoring the implementation of the new strategy for international co-operation (2021-2025). It is mandatory to include gender equality and at least one "LNOB group" as units of disaggregation for all reference indicators, with exceptions only where justifiable. For each indicator, a fact sheet is available that provides a definition and description for the target, the rationale behind the indicator and a theory of change.

In the annual gender status report for 2020, results were disaggregated for priority areas by numbers of women and men and numbers of women and men from disadvantaged groups. For illustrative examples in the report, information was included on women and men from disadvantaged groups.

Box 6.7. Canada: Intersectionality as an analytical method

Canada expanded its definition of "gender" to include a spectrum of sexual orientations and gender identities in 2018. To reflect this, Canada developed an analytical process known as GBA Plus (Gender-based Analysis Plus). It is an analytical process that provides a method for the assessment of systemic inequalities, as well as a means to assess how diverse groups of women, men, and gender diverse people may experience policies, programs, and initiatives.

This method extends the analysis to assess for identifying factors beyond biological sex and socially constructed gender identities and considers other identifying factors such as race, ethnicity, religion, age, and mental or physical disability, and how the interaction between these factors influences the way we might experience government policies and initiatives. It also addresses the importance of diversity and inclusion in achieving transformative change and thus, equitable and sustainable development.

Some considerations for incorporating GBA Plus in evaluation and monitoring are:

- Were diverse perspectives assessed and factored into the initial design?
- Does the sex- and/or gender-disaggregated data being used in the evaluation phase include diverse people?
- Have baseline indicators been established to measure the effectiveness of the initiative, and are they conducive to assessing the impact on various sub-groups of the target population? If not, what data collection methods would best measure outcomes for these groups?
- Are there gaps in the quantitative or qualitative data needed to effectively measure outcomes? How could these gaps be filled?
- Are there differences in how various groups access or experience the program or service? Are there gaps that pose risks or create unintended barriers for some groups? How can these gaps be filled?

Source: Canada (2022[144]), Gender-based Analysis Plus (GBA Plus), https://women-gender-equality.canada.ca/en/gender-based-analysis-plus.html

Box 6.8. Sex- and age-disaggregated data give a broader understanding of violence cases

The ILO developed a survey in collaboration with Lloyd's Register Foundation and Gallup to provide a global overview of people's own experiences of physical, psychological, and sexual violence and harassment at work. Each answer of the survey is disaggregated by sex, age, but also by nationality, ethnicity, religion, and disability status. It allows for a broader and better understanding of who is affected by those types of violence and therefore helps to adopt more adapted measures to fight them.

Figure 6.1. Share of persons in employment globally who have experienced violence and harassment at work within the past five years, by type of violence and harassment, by age and by sex, 2021 (%)

Survey question: Approximately, when was the last time this happened to you — was it within the last year, two to five years ago, or more than five years ago?
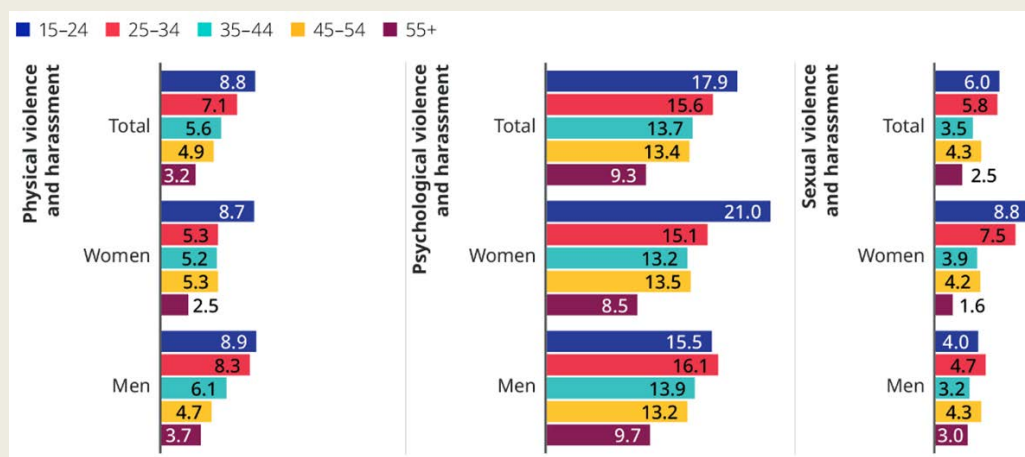
Note: Among all employed persons 15 and older who said they have experienced physical, psychological, or sexual violence and harassment at work. Global estimates are weighted by the overall employed population of individuals aged 15+ for each country.
Source: ILO & Lloyd's Register Foundation (2022[145]), Experiences of Violence and Harassment at Work: A Global First Survey,
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Risk assessments in preventing SEAH

Certain indicators and data points can also be used in the context of assessing the risk of SEAH in a particular context. Risk assessments are important in information decision-making in any development or humanitarian context, and adapting risk criteria for SEAH specifically is important.

Box 6.9 below provides an example of such an analytical framework.

**Box 6.9. IASC Sexual Exploitation and Abuse Risk Overview (SEARO)**

The SEARO, a composite index, simplifies a large amount of information to facilitate the analysis of complex issues. The SEARO brings together indicators on a range of different factors that can influence the risk of SEA. It categorizes countries with ongoing humanitarian response operations according to their level of risk, enabling comparisons of risk between countries and assessing how those risks change over time.

This composite index can help governments and institutions to make more informed use of limited humanitarian resources, by informing decision-making both at the global and country level. It can help identify priority issues and countries of concern, to help design effective mitigation measures by prioritizing countries for additional allocation of resources, capacity, projects, advocacy and stakeholder dialogue.

The SEARO Analytical Framework was developed from an initial pool of more than 240 potential risk factors identified through a literature review of 80+ sources and consultation with 28 experts. SEARO comprises four dimensions and reflects distinct factors of risk that: exist in every country (Enabling Environment); are introduced along with a humanitarian crisis (Humanitarian Context); are introduced

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along with a humanitarian response operation (Operational Context); and are introduced with specific measures that aim to address SEA (Protective Environment).

Figure 6.2. SEARO Framework
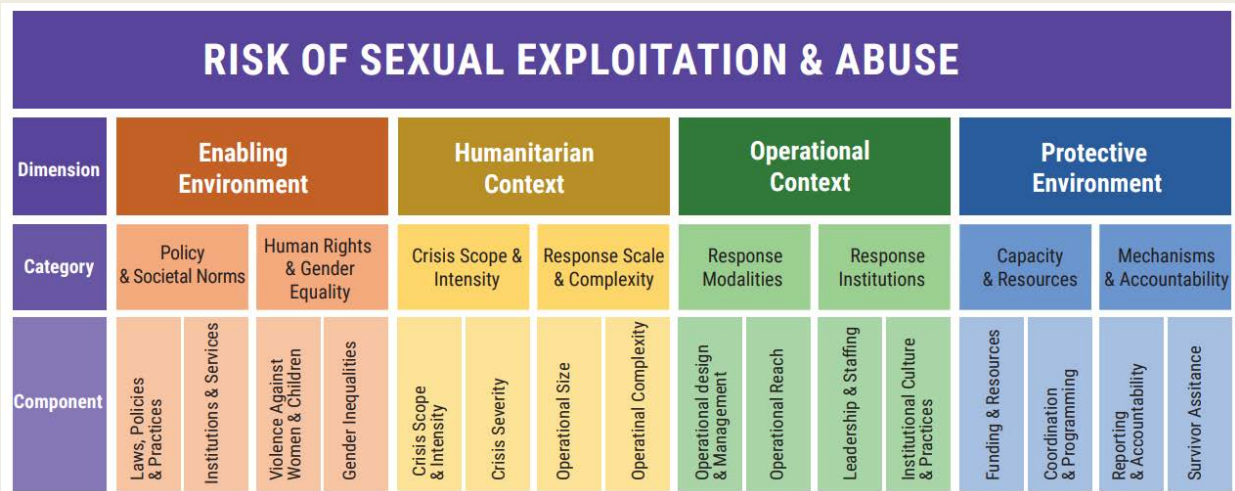
Note: SEARO is a collaboration of the Inter-Agency Standing Committee (IASC) Secretariat, the United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA), the United Nations Children's Fund (UNICEF) and the UK Foreign and Commonwealth Development Office (FCDO).
Source : IASC (2022[146]), Sexual Exploitation and Abuse Risk Overview (SEARO) Index, https ://psea.interagencystandingcommittee.org/iasc-sea-risk-overview-index

Checklist on Pillar 6

DAC Members are invited to consider the following questions:

On monitoring & evaluation:

- Do you have mechanisms established for monitoring? And Evaluation? Do these follow criteria and definitions based on standards (such as those established by the DAC Network on Evaluation)?

- Has the use of independent progress and impact assessments been considered?

- Are M&E mechanisms established for (1) internal institutional mechanisms? (your own policies and systems); (2) are they also integrated into partnerships with implementing partners? (3) and cross-sector/multi-actor partnerships or initiatives?

- Have you considered M&E for development assistance and programming across other sectors that impact the effectiveness of SEAH prevention and response? (i.e. gender equality, GBV, health, governance, etc.).

On data:

- Have qualitative and quantitative measures and assessments been used – of both your own initiatives, and those of partners?

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- Do your SEAH prevent and response efforts include data and privacy protections, based on international standards?

- Have efforts been made to share data and information across organisations, when appropriate and safe?

- Have efforts been made to improve data, including sex- and age-disaggregated data collected and used in SEAH prevention and response?

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