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EVALUATIVE REVIEW OF UNHCR'S POLICIES AND PROCEDURES ON THE PREVENTION OF AND RESPONSE TO SEXUAL EXPLOITATION AND ABUSE

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At a glance	
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List of abbreviations

AAP	Accountability to Affected Populations
AGD	Age, Gender Diversity
CBCM	Community-based complaint mechanisms
DER	Division of External Relations
DHRM	Division of Human Resources Management (now DHR)
DIP	Division of International Protection
HQ	Headquarters
IASC	Inter-Agency Standing Committee
IGO	Inspector General's Office
KII	Key informant interview
LAS	Legal Affairs Services
LGBTI	Lesbian, Gay, Bisexual, Transgender and Intersex
MOS	Minimum Operating Standards
NGO	Non-governmental organisation
PPA	Project Partnership Agreement
PSEA	Protection from Sexual Exploitation and Abuse
SEA	Sexual Exploitation and Abuse
SGBV	Sexual and Gender Based Violence
SH	Sexual Harassment

Executive summary

This report presents the findings of a review of UNHCR's policies and procedures to protect refugees, returnees, stateless people, internally displaced people and asylum-seekers (UNHCR's 'persons of concern'[1]) from sexual exploitation and abuse by humanitarian actors (PSEA). It is intended to be a 'light touch' evaluative review of UNHCR's current policies and procedures on PSEA, and how they are being interpreted and implemented in practice. It is not an evaluation of the effectiveness of UNHCR's policies and procedures in mitigating risk, changing behaviour or responding to specific incidences of SEA. UNHCR's policies and procedures on PSEA are evolving and adapting as the agency seeks to strengthen its approach to prevention and response, so this should also be seen as a stock-take of a system in motion.

UNHCR seeks to provide 'a trusted, respectful and inclusive environment where the people we serve and those who work for the organization feel safe, heard, equipped and empowered to speak up for themselves and others and to take robust and visible action, as appropriate, to eradicate sexual exploitation and abuse as well as sexual harassment.'[2] UNHCR's commitment on PSEA has been implemented since 2002 through a series of measures relating to awareness-raising, reporting, investigations, disciplinary action and survivor and whistle-blowing protection. The past year has seen a very noticeable 'step change in [UNHCR's] approach and engagement'[3] on PSEA, driven by UNHCR leadership and clearly strengthening the agency's pre-existing commitment to eradicating sexual exploitation and abuse.

Since 2009 the intention of the agency has been to 'mainstream' PSEA in UNHCR operations. The review finds that this intention has been partially successful. However PSEA governance, and staff and management responsibilities and accountabilities on PSEA are not yet as clear as they need to be to ensure effective mainstreaming. On a day-to-day basis, much of the responsibility for PSEA has been delegated to 300 PSEA Focal Points, representing less than 2 per cent of the agency's total workforce. UNHCR staff are working with persons of concern to raise awareness and assess the risk of sexual exploitation and abuse, but it is not clear how consistently or systematically PSEA is being integrated into the agency's day-to-day work with persons of concern.

The agency is proactive in encouraging staff to report concerns regarding sexual exploitation and abuse, and the increase in numbers of reports received suggest these efforts may be paying off. However, feedback from both staff and persons of concern confirm that barriers to reporting still exist. UNHCR prioritises the investigation of complaints of sexual exploitation and abuse (SEA), and is making efforts to strengthen investigations and disciplinary outcomes on SEA cases, but a number of operational challenges remain, including the resourcing of investigations. The absence of a strategy regarding the capacity-building and monitoring of partner organisations on PSEA, combined with the limited resources of PSEA Focal Points, also mean that the agency's ability to assure

[1] *UNHCR, 2018, 'Who we Help' accessed 23rd August 2018 from http://www.unhcr.org/who-we-help.html*
[2] *From UNHCR Addressing Sexual Exploitation and Abuse and Sexual Harassment Strategy and Action Plan 2018; and also found at https://www.unhcr.org/our-fight-against-sexual-exploitation-abuse-and-harassment.html*
[3] *Executive Committee of the High Commissioner's Programme 73rd Standing Committee meeting: Statement by Ms. Diane Goodman, Senior Coordinator, Prevention of and Response to Sexual Exploitation and Abuse and Sexual Harassment 20 September 2018 https://www.unhcr.org/5ba4e1774*

the capacity of its partner organisations on PSEA, or monitor the performance of both partners and vendors, is limited.

UNHCR's 2018 strategy and action plan on sexual misconduct makes clear that sexual exploitation and abuse of persons of concern is a betrayal of the agency's protection mandate, and that the elimination of SEA requires changes in both individual behaviour, and agency culture. The review finds that some elements of effective culture change are in place. It also finds that significant amounts of agency effort have been focused on individual behaviour change particularly around staff reporting. However there is more to do in both areas in order to make further progress. The review also finds that whilst PSEA is clearly understood by the agency as a protection risk, this understanding is not currently translating on a consistent, day-to-day basis into the implementation of PSEA as a protection priority.

It is hoped the following twelve recommendations will enable UNHCR to make further progress on PSEA, and achieve the agency's ambition of eliminating sexual exploitation and abuse of all persons of concern for the future.

Recommendations

1 **UNHCR to reiterate its commitment to mainstreaming PSEA throughout every aspect of its operations.** In addition to continuing with the clear and consistent messaging to staff at all grades that the protection of persons of concern from sexual exploitation and abuse is indeed 'everyone's responsibility', UNHCR should reinforce these messages by emphasising the specific shifts in agency culture and individual behaviours that are needed and by enhancing the mechanisms and resourcing required to ensure mainstreaming happens in practice at individual, functional, programmatic and institutional levels.

2 **UNHCR to continue the dialogic and diagnostic work of clarifying responsibilities and accountabilities for PSEA across the agency.** Further work is needed in relation to establishing clear institutional governance of PSEA (at HQ, regionally and in-country), including clarifying the different roles and contributions of stakeholders in the HQ Emergency Task Force to achieving the agency's vision of eliminating sexual exploitation and abuse. Individual accountabilities need to be made more explicit. As a priority, this means including PSEA in the responsibilities of leaders and managers in the newly-created regional entities and in-country, and in the role descriptions of all Protection and programming staff. Functional responsibilities for PSEA management (including the role of the Division of International Protection - DIP) need to be clarified and agreed. Mechanisms for strengthening responsibilities and accountabilities should be developed, including but not limited to amendments to written frameworks and tools.

3 **UNHCR to continue to resource a Senior Coordinator role for the foreseeable future,** with responsibility for facilitating development, coordination, collaboration, ongoing review of and learning from the agency's strategy and plans on PSEA. The Senior Coordinator to continue to report into the Executive Office and have the ongoing support of an operational PSEA Working Group.

4 **UNHCR to strengthen and further develop the network of PSEA Focal Points across its operations.** The number of PSEA Focal Points in different operations will need to take into account the size and nature of

the operation, but the expectation of the review is that each country operation will continue to have PSEA Focal Points, and that these will be resourced at a sufficiently senior level to ensure both an effective mainstreaming approach internally, and effective PSEA management in protection and programming. At HQ level the Senior Coordinator, Ethics Office, DIP and other functional stakeholders to agree between them the distribution of roles and responsibilities in developing and supporting the performance and impact of the PSEA Focal Point network.

5 **The next iteration of the 2018 Strategy on SEA and SH to pay more explicit attention to addressing PSEA as a protection priority.** This includes ensuring an inclusive victim-centred approach to PSEA that recognises and addresses the needs of all persons of concern including paying specific attention to marginalised groups such as LGBTI people, children, people with disabilities, ethnic minorities, people who cannot read or write. Included in the strategy should be a review of the effectiveness of communications and awareness-raising activities with persons of concern on PSEA, and of the effectiveness of current community-based complaints mechanisms in preventing and responding to sexual exploitation and abuse. The strategy should also include greater emphasis on risk assessment and mitigation, and on action to increase the safety and security of survivors.

6 **UNHCR to continue the work to ensure a coherent policy framework on PSEA.** The agency should continue to ensure alignment of and between the range of institutional policies relevant to PSEA. It should also consider a review of its Code of Conduct to ensure consistency with the approach on PSEA.

7 **UNHCR to build a global learning and development strategy on PSEA.** The strategy to incorporate staff feedback on existing mandatory training to increase its relevance and impact. It should strengthen targeted training for specific roles such as PSEA Focal Points and investigations staff. It should also ensure the integration of PSEA content into existing learning and development, for instance management and leadership development, and existing training for protection and programme staff.

8 **UNHCR to continue action to strengthen staff reporting mechanisms.** This includes taking action to engage staff in feedback on and design of reporting procedures and mechanisms, as well as raising awareness of and continuing to strengthen mechanisms to assure staff safety and security.

9 **UNHCR to revisit the resourcing of and approach to third-party (partner and vendor) capacity on PSEA.** The agency to develop a strategy and tools which emphasise collaboration with partner organisations as advocates and allies in PSEA, over increasing control and accountability. UNHCR to designate a named entity to lead the implementation of the requirements under the UN Protocol on Partners. This may be an existing entity or a new one, for instance UNHCR may wish to consider establishing a Partner Advisory Panel, including partners as members, whose first action should be to prioritise local and international partners for monitoring and capacity-building on PSEA, based on an assessment of the extent of direct contact with persons of concern. PSEA Focal Points should be encouraged to develop collaborative approaches with other UN agencies for localised training, support and monitoring of those partners which have the highest contact with persons of concern, and low PSEA capacity. A strategy and tools are also needed to identify and prioritise vendors for capacity-building and compliance-checking on PSEA, based on a similar assessment of the extent of direct contact with persons of concern.

10 **UNHCR to review the budgets and resourcing of PSEA, including the Ethics Office, Senior Coordinator's team and the Division of International Protection. As a priority the agency should review the resourcing of IGO and LAS** to ensure the ongoing prioritisation and efficient expediting of sexual misconduct cases. IGO should continue efforts to enhance its expertise in investigating SEA, including by drawing on external expertise as necessary, to increase capacity and knowledge in SEA investigations. Assigning female investigators to interview female survivors should be the default, subject to immediate availability, and this requirement should be taken into account in resourcing plans. UNHCR should remain engaged in efforts within the UN system to address barriers posed by the evidentiary threshold for establishing sexual misconduct.

11 **UNHCR to contribute to, encourage and support inter-agency mechanisms and culture to facilitate greater collaboration on PSEA** and greater transparency in the exchange of current practices and learning on PSEA across the UN system. The High Commissioner to use the agency's forthcoming term as IASC Champion to encourage mainstreaming of PSEA in all areas of humanitarian response, prioritising the theme of culture change on PSEA at organisational and system-wide levels, and evolving and reporting on shared metrics of progress on.

12 **UNHCR to continue to proactively discuss PSEA with donors.** In the spirit of Grand Bargain commitments, efforts to streamline PSEA reporting requirements with donors should continue. Guidance should be developed on integrating PSEA activities in the UNHCR Global Report and Global Appeal.

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1. Introduction

This report presents the findings of a review of UNHCR's policies and procedures to protect refugees, returnees, stateless people, internally displaced people and asylum (UNHCR's 'persons of concern'[4]) from sexual exploitation and abuse by humanitarian actors (PSEA). The review was commissioned by UNHCR High Commissioner, Filippo Grandi, in March 2018, with the purpose of taking stock of the agency's current approach on PSEA, and identifying possibilities for improvement. The review was managed by UNHCR's Evaluation Service, and conducted between August 2018 and April 2019 by a team of external consultants.

2. Definitions and context

2.1 Definitions

PSEA (Protection from Sexual Exploitation and Abuse) is the term used to refer to measures taken to protect persons of concern from sexual exploitation and abuse by anyone responsible for the provision of humanitarian aid (UN staff and related personnel).

- 'Sexual exploitation' is 'any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another'.[5]
- 'Sexual abuse' is 'the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions'.[6]
- 'Related personnel' means anyone working for or on behalf of UNHCR partner organisations, as well as consultants, contractors, day labourers, interns, volunteers etc).

2.2 PSEA in context

Several sources reference 2002 as the date when PSEA originated as a 'distinct area of work',[7] following confirmed reports that humanitarian workers had been responsible for acts of sexual exploitation and abuse against persons of concern in Liberia, Guinea and Sierra Leone.

The United Nations – along with others in the humanitarian sector – responded to these allegations by implementing a 'myriad of policies, procedures, principles, mechanisms, measures, initiatives and task forces' on PSEA[8], including:

[4] *UNHCR, 2018, 'Who we Help' accessed 23rd August 2018 from http://www.unhcr.org/who-we-help.html*
[5] *Secretary-General's Bulletin entitled* Special measures for protection from sexual exploitation and sexual abuse *(ST/SGB/2003/13) https://www.unhcr.org/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html, 9 October 2003*
[6] *Ibid*
[7] *See for instance How change happens in the humanitarian sector: Humanitarian Accountability Report 2018, CHS Alliance, 2018 https://www.chsalliance.org/har and Final Report: Independent Panel Review of the UNICEF Response to PSEA, September 2018, viewed 5 October 2018.*
[8] *Ibid*

- 2003: UN Secretary-General issues a Bulletin which defines and explicitly prohibits sexual exploitation and abuse by 'all staff of the United Nations and staff of separately administered organs and programmes of the United Nations'. The Bulletin makes clear that any UN staff member who develops ''concerns or suspicions regarding sexual exploitation or abuse by a fellow worker'' must report such concerns via the appropriate mechanisms.[9]

- 2005: UN Secretariat makes clear that the implementation of zero tolerance towards acts of sexual exploitation and abuse should be clearly defined as a core management function.[10]

- 2010: UN Inter-Agency Standing Committee (IASC) finds that 'while progress has been made on the establishment of PSEA policy, this has not translated into managerial and staff understanding and acceptance of these policies…the most critical gap in organisational support to PSEA is that of visible senior management leadership to actively promote PSEA policies and to proactively support PSEA activity, while holding field managers accountable for implementation'. [11]

- 2012: IASC Task Force on PSEA is established.

- 2014: IASC Task Force on PSEA merges with the IASC Task Force on Accountability to Affected Populations (AAP), to create the IASC AAP/PSEA Task Team, which is co-chaired by UNHCR. The Task Team brings together national and international humanitarian organisations with the purpose of creating a 'culture of accountability' and encouraging the institutionalisation and operationalisation of PSEA at all levels in the humanitarian system.[12]

- 2015: IASC Principals commit to fully implementing a set of Minimum Operating Standards on PSEA (MOS-PSEA)[13] relating to: management and coordination of PSEA efforts, engagement with and support of community populations, prevention through awareness-raising, recruitment and performance management, and response (complaints and investigations procedures).

- 2016: UN Secretary-General issues a report on 'Special measures for protection from sexual exploitation and sexual abuse'[14], including promoting transparency, vetting and training of peacekeepers and civilian personnel, enforcing accountability, strengthening management of the risks of PSEA, and strengthening remedial action. A UN Special Coordinator is appointed to improve the UN's response on sexual exploitation and abuse.

- 2017: UN Secretary-General issues a strategy to improve the 'system-wide approach to preventing and responding to sexual exploitation and abuse. The strategy focuses on four main areas of action: putting victims first; ending impunity; engaging civil society and external partners; and improving strategic communications for education and transparency.'[15] Annex III of the strategy document details 55 separate

[9] *Secretary-General's Bulletin Special measures for protection from sexual exploitation and sexual abuse, ST/SGB/2003/13, 9 October 2003, Section 2.1*
[10] *https://www.un.org/press/en/2005/pko120.doc.htm*
[11] *Global Synthesis Report IASC Review of Protection from Sexual Exploitation and Abuse by UN, NGO, IOM and IFRC Personnel, 18 June 2010*
[12] *IASC Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse (AAP/PSEA). https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse [accessed 07 September 2018]*
[13] *MOS-PSEA available at https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse/content-1 accessed 16 September 2018*
[14] *Report of the Secretary-General on Special measures for protection from sexual exploitation and sexual abuse (A/70/729), 16 February 2016 http://undocs.org/A/70/729 [accessed 04 September 2018]*
[15] *Report of the Secretary-General: Special measures for protection from sexual exploitation and abuse: a new approach (A/71/818), 28 February 2017 https://undocs.org/A/71/818 [accessed 04 September 2018]*

initiatives and proposals on addressing sexual exploitation and abuse, including measures for prevention, protection and victim assistance, and response (investigations and accountability). A UN Advocate for the Rights of Victims of Sexual Exploitation and Abuse is appointed. The UN Protocol on allegations of sexual exploitation and abuse involving implementing partners is issued, taking as its general principle that 'the UN does not partner with entities that fail to address sexual exploitation and abuse through appropriate preventive measures, investigation and corrective action. Such failures shall constitute grounds for the termination of any cooperative arrangement with the UN'. [16]

Despite these interventions, multiple reports continue to document ongoing sexual exploitation and abuse by those responsible for delivering humanitarian aid:

- 2004: report on exploitation and abuse by UN peacekeepers and civilian personnel in Democratic Republic of Congo.[17]
- 2008: report alleging significant levels of abuse against children in emergencies.[18]
- 2014: report on child sexual exploitation and abuse by peacekeepers in Central African Republic.[19]
- 2018: allegations of humanitarian workers paying women for sex following the 2010 earthquake in Haiti[20]; report on sexual exploitation and abuse of women and girls in Syria by aid workers there.[21]

2.3 PSEA in UNHCR

UNHCR describes itself as having 'as part of its mandate, a well-developed institutional awareness of Sexual Exploitation and Abuse as a grave protection risk for persons of concern; the exploitation and abuse causing suffering that includes negative social consequences, and further protection risks, for the survivors'.[22] Its aim is the eradication of sexual exploitation and abuse (and sexual harassment) from its operations, and its vision is to provide 'a trusted, respectful and inclusive environment where the people we serve and those who work for the organization feel safe, heard, equipped and empowered to speak up for themselves and others and to take robust and visible action, as appropriate, to eradicate sexual exploitation and abuse as well as sexual harassment.'[23] It is committed to zero tolerance on sexual exploitation and abuse, making clear that 'UNHCR personnel found to have engaged in sexual exploitation and abuse [will] have their employment terminated'.[24]

[16] *United Nations Protocol on Allegations Of Sexual Exploitation And Abuse Involving Implementing Partners, 27 April 2018*
[17] *The Independent, 11 January 2005, 'Sex and the UN: when peacemakers become predators. https://www.independent.co.uk/news/world/africa/sex-and-the-un-when-peacemakers-become-predators-486170.html [accessed 04 September 2018]*
[18] *Csaky, C. (2008) No One to Turn To. The under reporting of child sexual exploitation and abuse by aid workers and peacekeepers. Save the Children UK: London https://resourcecentre.savethechildren.net/node/2732/pdf/no_one_to_turn_to_1.pdf [accessed 04.September 2018]*
[19] *Deschamps, M., Jallow, H. B. and Sooka, Y. (2015) Report of an Independent Review on Sexual Exploitation and Abuse by International Peacekeeping Forces in the Central African Republic http://www.un.org/News/dh/infocus/centafricrepub/Independent-Review-Report.pdf [accessed 04 September 2018]*
[20] *The Times, 16 February 2018, 'How the Oxfam sex scandal unfolded', https://www.thetimes.co.uk/article/one-week-on-how-the-oxfam-sex-scandal-unfolded-rdq6qhzgh [accessed 04 September 2018]*
[21] *House of Commons International Development Committee, 31 July 2018, Sexual exploitation and abuse in the aid sector, Eighth Report of Session 2017–19. https://publications.parliament.uk/pa/cm201719/cmselect/cmintdev/840/840.pdf [accessed 04 September2018]*
[22] *From Terms of Reference for the Evaluative Review, 2018*
[23] *From UNHCR Addressing Sexual Exploitation and Abuse and Sexual Harassment Strategy and Action Plan 2018; and also found at https://www.unhcr.org/our-fight-against-sexual-exploitation-abuse-and-harassment.html*
[24] *https://www.unhcr.org/our-fight-against-sexual-exploitation-abuse-and-harassment.html accessed 13 February 2019*

UNHCR's commitment on PSEA has been implemented since 2002 through a series of measures relating to awareness-raising, reporting, investigations, disciplinary action and survivor and whistle-blowing protection. These include:

2003 – 2017

- 2003: UNHCR's Director of Human Resource Management (DHRM) issues a memorandum to all staff, reiterating that the Secretary-General's Bulletin is legally binding on all staff, that 'it is the responsibility of every manager to be fully conversant with the content of this document and ascertain that each staff member receives a copy and that Implementing Partners [IP] are informed of its content' and that the Bulletin should be read 'in conjunction with the existing UNHCR Code of Conduct'.[25]

- 2004: UNHCR's Code of Conduct[26] (in place since 2002) is supplemented by the full text of the Secretary-General's Bulletin. DHRM issues a further memo to senior management in HQ and the field, making clear that 'any UNHCR Branch Office with a substantial presence in a particular country should appoint a senior-level SEA Focal Point and Alternate in their respective field operations', and that that all UNHCR offices are expected to implement 'in full' the provisions of the Secretary-General's Bulletin. Senior managers are also made responsible for reporting 'to the UNHCR's Office of the Inspector General on matters which involve UNHCR staff... The focal point on sexual exploitation and abuse at Headquarters is the Office of the Inspector General in matters related to investigation involving staff and the Bureaux in relation to other matters regarding sexual exploitation of refugees'.[27]

- 2005: UNHCR issues its policy on harassment, sexual harassment and abuse of authority,[28] focusing on workplace harassment by and of UNHCR employees (differentiating it from sexual exploitation and abuse of persons of concern).

- 2009: The High Commissioner appoints the Director of the Ethics Office as UNHCR's Senior SEA Focal Point, reporting directly to the High Commissioner, with responsibility for leading and coordinating the work of 'concerned units within UNHCR toward effective monitoring and mainstreaming of this issue'.[29]

- 2016: PSEA Focal Point network launched. The content of the annual face-to-face Code of Conduct refresher sessions, mandatory for all staff, is updated to include specific emphasis on diversity and inclusion, sexual harassment, sexual exploitation and abuse. [30]

- 2017: Mandatory on-line training on PSEA launched[31] and the 'No Excuse' card circulated to all staff, setting out standards and obligations to prevent and report sexual exploitation and abuse. Guidance is issued to country operations on planning and budgeting for PSEA activities, including: assessing SEA risks, training staff and partners on PSEA, establishing PSEA Standard Operating Procedures (SOPs), including SEA

[25] https://cms.emergency.unhcr.org/documents/11982/32382/Secretary-General%27s+Bulletin.+Special+Measures+for+Protection++from+Sexual+Exploitation+and+Sexual+Abuse/01ea1241-0740-42de-a798-83a32d6900e6 accessed 16 September 2018
[26] https://www.unhcr.org/admin/policies/422dbc89a/unhcr-code-conduct-explanatory-notes.html
[27] Memorandum subject: UNHCR Compliance with the Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse, 27 April 2004
[28] Reissued 2014 as Policy on Discrimination, Harassment, Sexual Harassment and Abuse of Authority, UNHCR/ HCP/ Z014/4
[29] From Protection from Sexual Abuse and Sexual Exploitation: message to all staff in HQ and the field, from the High Commissioner, dated 17 April 2009
[30] https://reliefweb.int/sites/reliefweb.int/files/resources/5aa29a2e7.pdf
[31] https://reliefweb.int/sites/reliefweb.int/files/resources/5aa29a2e7.pdf

in participatory assessments with refugees, and engaging with local communities in the design and implementation of community-based complaint mechanisms. [32]

2018 to date

2018 was characterized by a 'step change in [UNHCR's] approach and engagement'[33] on PSEA. Key measures introduced include:

- New HQ structures and governance on PSEA. In March 2018 the High Commissioner created a temporary position of Senior Coordinator for Prevention and Response on Sexual Exploitation and Abuse and Sexual Harassment, reporting to the Deputy High Commissioner, to 'lead and coordinate UNHCR's work on SEA and SH, including the development of an overarching strategy and implementation of an established work plan'.[34] A cross-functional Director-level Emergency Task Force on SEA and SH was established, chaired by the Deputy High Commissioner, along with an internal Working Group on SEA and SH responsible for defining and supporting work streams to deliver the agency's objectives on PSEA, supporting the work of the Senior Coordinator, and 'engaging with UNHCR colleagues globally, including in field operations, regional offices and headquarters, to ensure that the efforts of the organization to combat SEA and SH reflect the operational needs of UNHCR in a diverse range of settings'.[35]

- A new vision, strategy and objectives on sexual misconduct, including action on both SEA and SH. [36] [37]

- A renewed focus on staff awareness-raising, learning and development on PSEA, and compliance (the High Commissioner sent out a message requiring all staff to complete the mandatory on-line training on PSEA by the end of March 2018).

- A step-up in information-sharing and dialogue with staff about PSEA through multiple means (globally, locally, face-to-face, virtually, in writing) regarding roles, responsibilities, policies, procedures, progress and challenges on preventing and responding to sexual exploitation and abuse. Two whole-of-organisation 90-minute on-line conversations with senior leadership were live-streamed, which managers were encouraged to follow up with further dialogue locally. A dedicated intranet site was established, providing easier access to resources on sexual misconduct for staff, managers, survivors and witnesses. A global Representatives meeting used personal testimony to bring to life the experience and impact of sexual exploitation and abuse and sexual harassment for senior managers.[38]

- Encouragement to staff to report, by making reporting easier in practice (a Speak Up helpline was launched in October 2018, available 24/7 by phone, email or app) and by strengthening assurances regarding protection from retaliation, safety, security and support of staff complainants.[39] A new Administrative

[32] Planning for the Protection from Sexual Exploitation and Abuse (PSEA): UNHCR/AI/2017/11 – Reporting on 2017 – Implementation in 2018 – Planning for 2019
[33] *Executive Committee of the High Commissioner's Programme 73rd Standing Committee meeting: Statement by Ms. Diane Goodman, Senior Coordinator, Prevention of and Response to Sexual Exploitation and Abuse and Sexual Harassment 20 September 2018* https://www.unhcr.org/5ba4e1774
[34] *From 'Terms of Reference for the Senior Coordinator on Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment'*
[35] *All staff memo from Deputy High Commissioner, 10 May 2018, Composition of the working group on Sexual Exploitation and Abuse and Sexual Harassment*
[36] *UNHCR Addressing Sexual Exploitation and Abuse and Sexual Harassment Strategy and Action Plan 2018 (internal document)*
[37] https://www.unhcr.org/our-fight-against-sexual-exploitation-abuse-and-harassment.html
[38] *Executive Committee of the High Commissioner's Programme, 73d Standing Committee meeting: Statement by Ms. Diane Goodman, Senior Coordinator, Prevention of and Response to Sexual Exploitation and Abuse and Sexual Harassment Agenda Item: 5. Any other business, 20 September 2018*
[39] Administrative Instruction on Protection against Retaliation, *UNHCR/AI/2018/10. Date of entry into force 1 September 2018*

Instruction on Protection Against Retaliation[40] circulated to all staff by the High Commissioner made clear his determination to 'foster an environment in which everyone feels safe and free to come forward and speak up, and to protect colleagues who report misconduct or engage in any other protected activity'.[41] The new instruction extends the timeframe for staff seeking protection from 90 days to 6 months, and covers the risk of retaliation against staff, as well as actual retaliation or threat of retaliation.[42]

- Resourcing (budget and headcount) directed towards PSEA, with positions identified for instance in the investigations and Legal Affairs Services to deal with sexual misconduct cases, and in the Ethics Office to provide support to over 300 PSEA Focal Points in HQ and the field.[43]

In addition, UNHCR plays a significant role on PSEA at a system-wide level, both globally and in-country. Global initiatives include:

- Co-authoring the IASC Best Practice Guide on Inter-Agency Community-Based Complaints Mechanisms and the IASC Global Standard Operating Procedures on Inter-Agency Cooperation on Community-Based Complaints Mechanisms.[44]

- Resourcing the IASC AAP PSEA Task Team co-chair and coordinator roles.[45]

- Collaborating on the development of the IASC Championship Role Strategy on SEA and SH, which prioritises encouraging a speak-up culture, improving survivor-centred support and protection, and strengthening vetting, reference-checking, investigation processes and disciplinary measures,[46] and the development of the Protocol on Allegations of Sexual Exploitation and Abuse involving implementing partners.[47]

- Collaborating on the development of a common UN mechanism for checking international professional level candidates against a database of SEA offenders. The system, which is under the management of the OneHR joint UN Centre for Human Resources, went live in June 2018.[48] It includes employment, academic record and qualitative reference verification plus a Clear Check process by which former UN personnel are screened 'against the following United Nations databases: Sexual Exploitation and Abuse (SEA); Sexual Harassment and Abuse; and Security Council Sanctions List'[49] to identify those 'dismissed owing to substantiated allegations of sexual exploitation and abuse or who left the organization with a pending investigation or disciplinary case'.[50]

[40] Administrative Instruction on Protection against Retaliation, *UNHCR/AI/2018/10. Date of entry into force 1 September 2018*
[41] *Message to all colleagues in HQ and the field from the HC titled* New Administrative Instruction on Protection against Retaliation, *31 August 2018*
[42] *From Sexual exploitation, abuse and harassment: Frequently Asked Questions (undated)*
[43] *Investing in Integrity: UNHCR's organisational commitment to prevent, mitigate and respond to sexual exploitation and abuse, sexual harassment, fraud, corruption and other forms of misconduct, 2018-2019, http://reporting.unhcr.org/node/21117*
[44] *https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse/documents-50*
[45] *https://interagencystandingcommittee.org/system/files/minutes_of_the_psea-focused_task_team_meeting_september_2017.pdf accessed 23 February 2019*
[46] *Strategy Protection From And Response To Sexual Exploitation And Abuse And Sexual Harassment November 2018 IASC Champions on Sexual Exploitation, Abuse and Harassment https://interagencystandingcommittee.org/system/files/181101_iasc_champions_sea_sh_strategy_final.pdf accessed 23 February 2019*
[47] *From presentation notes: UNHCR Addressing Sexual Exploitation and Abuse and Sexual Harassment, Senior Coordinator on SEA and SH – Ethiopia mission, November 2018*
[48] *United Nations Global Center for Human Resources Services http://onehr.webflow.io accessed 25 January 2019*
[49] *United Nations Global Center for Human Resources http://onehr.webflow.io/our-services-basic-reference-verification accessed 14th February 2019*
[50] *Fact sheet on the Secretary-General's initiatives to prevent and respond to sexual exploitation and abuse https://www.un.org/preventing-sexual-exploitation-and-abuse/sites/www.un.org.preventing-sexual-exploitation-and-abuse/files/fact_sheet_un_system-wide_sea_initiatives_september_2018.pdf accessed 23 February 2019*

In addition the High Commissioner is taking on the role of IASC Champion on SEA and SH from September 2019 for 12 months, which will provide an opportunity for UNHCR to make an even more significant contribution to PSEA at an inter-agency level.

3. Approach to the review

3.1 Objectives

UNHCR commissioned the review recognising that 'notwithstanding the good practices, measures and initiatives taken, SEA is a continuous risk for UNHCR's persons of concern' and that 'there is therefore a need to review the existing policies and approaches and identify possibilities for improvement'.[51] The objectives of the review are:

a) To benchmark and compare UNHCR's policies and guidance on PSEA with the current standards within the UN, selected NGOs, and the international aid system to establish where improvements, or new approaches, are needed.
b) To assess the extent to which resources assigned to PSEA, the organisational structure to advance PSEA, and the activities and plans to prevent and respond to SEA are adequate and appropriate.
c) To assess, using examples from country operations, the extent to which UNHCR's prevention and response activities are effective and timely.
d) To identify existing practices of what works well (or not) and why, and explore ways of sharing these examples across the organisation.[52]

3.2 Scope

The review is intended to be, in the words of UNHCR's Evaluation Service, a 'light touch' evaluative review of UNHCR's current policies and procedures on PSEA, and how they are being interpreted and implemented, in HQ and a limited number of country operations. It is intended to provide an independent perspective on UNHCR's organisational approach; it is not an evaluation of the effectiveness of UNHCR's policies and procedures in mitigating risk, changing behaviour, or responding to specific incidences of SEA. Addressing sexual exploitation and abuse requires collaborative and coordinated action by multiple humanitarian actors (including UNHCR, other UN agencies, partners and donors). This is an evaluative review of UNHCR's policies and procedures only, rather than of the wider system response.

3.3 Methodology

Data collection and analysis was guided by six key questions:

1. How do UNHCR's policies and procedures compare to those current in other UN agencies and other members of the international aid community including NGOs?
2. To what extent have UNHCR's PSEA policies and procedure increased the capacity of UNHCR staff and related personnel to prevent and respond to SEA at both the global and country operations levels?

[51] *From Sexual Exploitation and Abuse: An Evaluative Review of UNHCR Prevention and Response Mechanisms, Draft Terms of Reference*
[52] *Ibid*

3. To what extent do regular community-based protection activities, as well as PSEA-specific activities, contribute to the prevention, identification and reporting of SEA?
4. To what extent is PSEA incorporated into UNHCR's global frameworks and practices?
5. In what ways do UNHCR's organisational culture and the composition/ profile of its workforce (at all levels) have a positive or negative impact on PSEA mechanisms?
6. What are the strengths and weaknesses of UNHCR's investigations and disciplinary measures?

Data sources included documentary review, key informant interviews with UNHCR staff and related personnel, focus group discussions with persons of concern, an on-line survey of UNHCR PSEA Focal Points, and an on-line external survey of other UN agencies and humanitarian organisations. Data was collected at UNHCR HQ in Geneva and in four country operations (Ethiopia, Lebanon, Pakistan and Ukraine). These operations were identified for participation in the review by UNHCR's Evaluation Service, based on a combination of geography, availability and the nature of the operation in-country (emergency, post-emergency, refugee/IDP, urban and camp settings).

DATA SOURCE	PARTICIPANT NUMBERS
Interviews with UNHCR staff in HQ and country operations	181
Interviews with staff of partner organisations	44
Focus group discussions with persons of concern	194
Interviews with staff from other UN agencies	32
Interviews with donor representatives	4
On-line survey of UNHCR PSEA Focal Points	126 respondents of 286 surveyed (44 per cent)
On-line survey of other UN agencies and international humanitarian organisations	11 respondents of 17 surveyed (65 per cent)

Table 1

There were some strengths to the primarily qualitative nature of the review, in particular the opportunity it gave to gather first-hand insights from staff and persons of concern about UNHCR's policies and procedures on PSEA. Interviews and focus group discussions were held with only a small number of UNHCR staff and persons of concern in a small number of countries but there was considerable consistency in their insights.

However, there were a number of challenges and limitations to the approach:

- Focus group discussions with persons of concern were conducted by gender (male/female) and age (older/younger), and there were no specific focus group discussions with LGBTI people or persons of concern with disabilities.

- Gathering robust data on how UNHCR's policies and procedures compare to those current in other UN agencies and other members of the international aid community proved challenging, despite the generosity of a number of humanitarian organisations in completing the survey. The review considered publicly-available information in the first instance but not all agencies (including UNHCR) make the detail or implementation of their PSEA policies and procedures publicly available for comparison.

- Many of the questions in the survey of PSEA Focal Points were implicitly asking about their performance in role, which is very likely to have impacted how Focal Points responded.

4. Key findings

4.1 Leadership and organisational commitment

UNHCR leadership has driven a step-up in approach on PSEA over the past 12 months, strengthening the agency's pre-existing and long-standing commitment to addressing sexual exploitation and abuse.

The senior leadership of UNHCR in HQ and in the country operations visited for this review is demonstrably committed to eliminating sexual exploitation and abuse. PSEA is seen as a protection risk to persons of concern, as a risk to the mandate of the organisation, and in direct contravention of its core purpose and values. The High Commissioner and Deputy High Commissioner have affirmed their intention to eradicate SEA on multiple occasions, and are visible champions, advocates and sponsors of action on PSEA both inside and outside the agency. The establishment of an HQ Director-level Task Force sends a clear message that PSEA is a senior-level priority, and its cross-functional membership signals that finding solutions requires a collaborative and systemic response from leaders across the organisation.

A new vision, strategy and organisational objectives have been established on sexual misconduct, incorporating both sexual exploitation and abuse, and sexual harassment. This is the first time the organisation has articulated a vision and strategy on sexual misconduct, and it represents a significant step forward for UNHCR in its approach. The agency's vision on sexual misconduct is to provide 'a trusted, respectful and inclusive environment where the people we serve and those who work for the organization feel safe, heard, equipped and empowered to speak up for themselves and others and to take robust and visible action, as appropriate, to eradicate sexual exploitation and abuse as well as sexual harassment.'[53]

The agency's strategy for achieving its vision involves:

1. 'Strengthening prevention of SEA and SH by nurturing an organizational culture, leadership and workplace practices that uphold UNHCR's values and ensure that each colleague understands his or her roles and responsibilities to prevent and respond to SEA and SH; [and]

2. Providing, through robust internal systems, a diligent, appropriate and sensitive response to all incidents of SEA and SH that places the rights and protection of victims, survivors and persons directly affected at the centre'.

The strategy recognises that both SEA and SH arise from differentials in power and privilege, and that addressing sexual misconduct of all kinds requires addressing organisational culture, leadership and workplace practices. Whilst the balance of action in the new strategy is on organisation culture, leadership and reporting, there is relatively little in it about the role of prevention, protection and programming in PSEA.

[53] *From UNHCR Addressing Sexual Exploitation and Abuse and Sexual Harassment Strategy and Action Plan 2018; and also found at https://www.unhcr.org/our-fight-against-sexual-exploitation-abuse-and-harassment.html*

4.2.1 Managing PSEA

The intention from 2009 to mainstream PSEA and make it 'everyone's responsibility' has been only partially successful, with much of the responsibility delegated to PSEA Focal Points. Accountabilities on PSEA are not as clear as they need to be, in order to achieve the new vision and strategy.

4.2.2 Governance

There is some ambiguity around key roles and reporting lines in the current governance of PSEA. UNHCR's Ethics Office is responsible for standards of conduct and integrity, and the Director of the Ethics Office is the Senior PSEA Focal Point and reports into the High Commissioner. The Ethics Office responsibilities in relation to PSEA include, setting and policy support on PSEA; advice to management and staff on practical implementation; prevention, training and outreach, and receiving complaints against retaliation.[54] It is responsible for the terms of reference of PSEA Focal Points in HQ and country operations, and for guidance, support and training and coordination of a PSEA Focal Point community of practice. The Ethics Office also has authority to 'represent UNHCR in the IASC Task Team for PSEA, and to lead and coordinate the work of relevant units within UNHCR in effectively operationalizing and implementing the Policy and report to the High Commissioner on related developments.'[55] The Senior Coordinator is responsible for coordinating PSEA activity across the organisation, and reports into the Deputy High Commissioner, who chairs the Emergency Task Force which includes the Director of the Ethics Office. The Senior Coordinator is a Director-level role and is perceived by many as 'the' person responsible for progress on PSEA, but the position is temporary, and holds no reporting authority other than for a Coordination Manager.

There is also some ambiguity regarding accountabilities in the current governance structure. The Working Group on SEA and SH has prepared an extensive and comprehensive multi-disciplinary workplan for the agency on PSEA[56], but it's not clear how different teams and functions are held to account for delivery or what the agreed reporting requirements of different stakeholders are, or the metrics and measures of performance.

4.2.3 Management and mainstreaming

UNHCR sees managers as 'key in creating change at individual and institutional levels' on PSEA,[57] but in practice levels of manager engagement on PSEA vary. Written instructions have been in place since 2016 regarding the role of Directors and Representatives on PSEA, but most managers have nothing specific in their job descriptions or performance goals on PSEA, and their accountability is unclear. Efforts are now being made to clarify and communicate the roles and responsibilities of managers on PSEA at all grades.[58]

Similarly, SEA is understood by the agency as a protection risk, but at present not all staff involved in protection are clear about their responsibilities and accountabilities on PSEA. Some staff in other areas are mainstreaming PSEA

[54] *From UNHCR intranet on accountabilities and responsibilities of Ethics Office*
[55] *https://intranet.unhcr.org/en/about/unhcr-manual/a-content-page/ch02-unhcrs-organizational-structure-and-accountability/executive-direction-and-management-edm/the-ethics-office.html accessed 21 February 2019*
[56] *IASC PSEA Action Plan Template 2018*
[57] *Investing In Integrity: UNHCR's organizational commitment to prevent, mitigate and respond to sexual exploitation and abuse, sexual harassment, fraud, corruption, and other forms of misconduct, 2018-2019, http://reporting.unhcr.org/node/21117 accessed 16 February 2019*
[58] *See for example UNHCR's Zero Tolerance Policy on Sexual Exploitation and Abuse (SEA): All staff memo from the High Commissioner, 29 April 2016*

in their operations (shelter, camp coordination, water and sanitation etc), but they lack information, guidance and accountability for action. Work is underway to incorporate specific responsibilities on PSEA into the job descriptions of both Protection and programming staff.

PSEA is integrated into some management frameworks in UNHCR, for example risk management and operations planning, as above. However PSEA is less clearly visible in other frameworks (UNHCR's Strategic Directions document for 2017-2021, its People Strategy 2016-2021 and its Age, Gender and Diversity Policy 2019 which incorporates Accountability to Affected Populations).

All current PSEA activity in UNHCR to date is funded from existing budgets. In April 2018 the Senior Coordinator for PSEA and SH submitted, on behalf Legal Affairs Service (LAS), Ethics Office, Inspector General's Office (IGO), Department of Human Resources (DHR) and Division of External Relations (DER), a successful request for 'transfer from Operational Reserve to OP/OL of DHRM, LAS, DER, IGO and Ethics for a total of $1,629,291 to Accelerate UNHCR's Response to Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment and Abuse'.[59] Most of the transfer was requested for additional temporary staffing of PSEA and SH activity by the Ethics Office, DHRM, IGO, DER and LAS. The *Administrative Instruction on Planning for 2020-2021* strengthens instructions to senior staff that 'activities must be planned, budgeted, implemented and monitored to support UNHCR's commitment to eradicate Sexual Exploitation and Abuse (SEA)'.[60] It also notes that the provisions of the UN Protocol on SEA allegations involving implementing partners, adopted April 2018[61] 'may have budgetary implications for UNHCR and will therefore need to be taken into consideration by all operations in relation to PSEA activities planning, budgeting, implementing and monitoring.'[62]

As a key risk management intervention, UNHCR is participating in the development of a common UN database and reference-checking mechanism to prevent recruitment of known SEA offenders. However the mechanism applies only to international recruitment procedures. UNHCR staff members 'account for two-thirds of the workforce and affiliate personnel one-third' and 'the national to international staff ratio is 72/28%', meaning that a significant proportion of UNHCR personnel will not being vetted for sexual misconduct through this system. [63]

4.2.4 PSEA Focal Points

PSEA Focal Points are a core mechanism in UNHCR's approach on PSEA. The review found them to be dedicated and hard-working managers and staff who together form a 'network of protection colleagues…nominated by their offices to put into place PSEA prevention and protection activities and ensure PSEA integration into the office's protection response strategy'.[64]

[59] *Request for transfer from Operational Reserve to OP/OL of DHRM, LAS, DER, IGO and Ethics for a total of $1,629,291 to Accelerate UNHCR's Response to Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment and Abuse, 13 April 2018*
[60] *UNHCRIAI/2019/1 Administrative Instruction on Planning for 2020·2021 8 February 2019 https://intranet.unhcr.org/content/dam/unhcr/intranet/policy-guidance/en/2019/UNHCR-AI-2019-1%20Administrative%20Instruction%20on%20Planning%20for%202020-2021.pdf accessed 24 February 2019*
[61] *See Section 8 above*
[62] *UNHCRIAI/2019/1 Administrative Instruction on Planning for 2020·2021 8 February 2019 https://intranet.unhcr.org/content/dam/unhcr/intranet/policy-guidance/en/2019/UNHCR-AI-2019-1%20Administrative%20Instruction%20on%20Planning%20for%202020-2021.pdf accessed 24 February 2019*
[63] Figures from https://intranet.unhcr.org/en/hr/about-hr.html accessed 23 February 2019
[64] *Terms of Reference for PSEA Focal Points, UNHCR Ethics Office [undated]*

The stated intention is that PSEA Focal Points should be senior staff, 'P4 level or senior-most protection colleague in the office'.[65] In practice, the survey of PSEA Focal Points found that most are in locally recruited roles (41 per cent of PSEA focal points are GS 4-7) or junior international positions (29 per cent are P2-3). Almost three quarters of PSEA Focal Points are women.

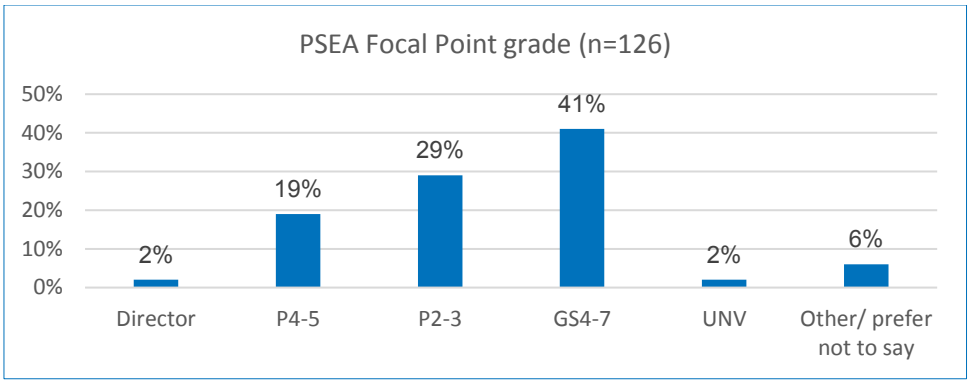


Figure 1

The scope and responsibility of the PSEA Focal Point role is extensive, but only 17 per cent of PSEA Focal Points responding to the survey said they had been selected for the role through a competency-based interview process. They are responsible for providing training and raising the awareness of all staff on preventing and responding to sexual exploitation and abuse; for working with persons of concern, conducting SEA risk assessments, providing training, raising awareness, developing reporting mechanisms and helping ensure support and referral for victims and survivors of sexual exploitation and abuse,[66] and for working with UNHCR's organisational partners to ensure compliance and coordination on PSEA.

At an individual level PSEA Focal Points report to local managers for their day-to-day work and performance management. However less than one-fifth of respondents to the PSEA Focal Point survey said that their Focal Point responsibilities were included in their job description, with only around one-third having these additional responsibilities included in their performance appraisal. Most PSEA Focal Points do the work on a voluntary basis, over and above their day job.

The Ethics Office is responsible for the role descriptions of PSEA Focal Points and for the overall management and coordination of the PSEA network. It has made significant efforts recently to strengthen support for the Focal Point network for example through developing a virtual Community of Practice and online collaboration hub Slack.[67] Just over half of respondents to the PSEA Focal Point survey said they participate in the Community of Practice.

The Ethics Office is also responsible for the training of PSEA Focal Points. However around two-thirds of PSEA Focal Point survey respondents said they had not been inducted to their role, and less than 40 per cent said they are supported through on-going training. More training was one of the main recommendations made by respondents

[65] *UNHCR Ethics Office, Terms of Reference for PSEA Focal Points (Field)*
[66] *See UNHCR Ethics Office, Terms of Reference for PSEA Focal Points (Field)*
[67] *https://slack.com/*

to the Focal Point survey to improve the role for the future, echoing the findings of an earlier survey of PSEA Focal Points conducted in 2016.[68]

4.3 Raising awareness

UNHCR has stepped up efforts to raise the awareness of staff and associated personnel on PSEA in recent months. Awareness-raising activities are ongoing amongst persons of concern.

UNHCR has made significant efforts to inform and communicate with staff regarding PSEA in recent months, in writing, in person and through a dedicated intranet site, to the extent that a small number of staff interviewees especially at HQ reported feeling overwhelmed and confused by a 'proliferation'[69] of material being issued on PSEA. Feedback suggests that the communications which are most appreciated by staff are those which are simple, heartfelt and provide opportunities for dialogue about sexual misconduct, over top-down information-sharing.

On-line training on PSEA and participation in annual face-to-face Code of Conduct sessions are mandatory for all UNHCR staff. Staff reported that both types of training helped raise awareness and understanding about sexual misconduct, and had some suggestions for improvement (such as making the on-line training more widely available in other languages and contextualising the content for different countries and cultures). However interviews with staff also found a number remain confused about similarities and differences between sexual exploitation and abuse and sexual harassment, and a small minority still remain to be convinced that sexual exploitation and abuse by humanitarian workers is a real and present risk for persons of concern. There is limited targeted training on PSEA for specific staff groups at the current time, but training for managers on attitudinal and cultural change is under development.

Awareness-raising on PSEA with persons of concern is the stated responsibility of PSEA Focal Points. Their role includes 'supporting consultations and awareness raising campaigns with staff, partners and communities about standards of behaviour to expect from humanitarian workers' and 'supporting managers to coordinate with partners and communities in relation to PSEA preventative activities'.[70] Efforts are also being made to communicate with persons of concern on PSEA through integration into protection outreach and monitoring, and sexual and gender-based violence (SGBV) awareness-raising, but this is not happening on a consistent basis. Less than half of PSEA Focal Point survey respondents agreed that UNHCR had communicated with persons of concern on the expected standards of behaviour of humanitarian workers. Feedback from persons of concern found most focus group participants, both women and men, recognised the risk of sexual exploitation and abuse by humanitarian workers, and there were high levels of agreement that such behaviour is unacceptable, but few had heard of a behavioural code prohibiting sexual exploitation and abuse by humanitarian workers.

Assessing the risk of sexual exploitation and abuse is the responsibility of Protection staff in the field, who are expected to include discussions about the risk of SEA in routine participatory assessments.[71] However, only 40 per

[68] *Survey on PSEA support needs PSEA Focal Points and Senior Managers, UNHCR Ethics Office (internal document), March 2017*
[69] *KII UNHCR staff member Geneva HQ*
[70] *Terms of Reference for PSEA Focal Points (Field) (undated)*
[71] *Planning for the Protection from Sexual Exploitation and Abuse (PSEA): UNHCR/AI/2017/11 – Reporting on 2017 – Implementation in 2018 – Planning for 2019 (internal document)*

cent of respondents to the PSEA Focal Point survey agree that UNHCR regularly undertakes community-based risk assessments on SEA, and only 35 per cent agree that the community is engaged in a meaningful way in ongoing analysis of the risks of sexual exploitation and abuse. In interviews some staff described how cultural barriers, plus a lack of information, guidance and confidence, prevented them engaging local communities in discussion on SEA. The review also saw some examples of PSEA being integrated into programmes in country operations, but not on a consistent basis. Most of the programme staff interviewed in-country see PSEA as the primary responsibility of their Protection and SGBV colleagues.

4.4 Reporting

UNHCR is proactively encouraging staff to report concerns regarding sexual exploitation and abuse, and the increase in numbers of reports received suggest these efforts may be paying off. However feedback from staff interviewees and persons of concern suggests that barriers to reporting still exist.

UNHCR has established multiple mechanisms to encourage staff to report concerns about sexual exploitation and abuse. These include reporting in-person via their manager, their PSEA Focal Point, via a volunteer network of 400 Peer Support advisors (staff with training in basic counselling and workplace grievances)[72] or via the Inspector General's Office (IGO). Staff can report on-line, by email or by phone to IGO, and they can also report via the new Speak Up helpline, operated 24/7 by an independent third party, and available by phone, email or app. Feedback from the PSEA Focal Point survey found that 43 per cent of respondents agreed that there are mechanisms for regular monitoring of practical barriers and use of complaints systems by staff, including soliciting input from staff about challenges and recommendations. In addition to the strengthening of reporting mechanisms, UNHCR is also seeking to encourage staff reporting by enhancing reassurances around safety, security and support for staff. A new Administrative Instruction on Protection Against Retaliation[73] was launched in August 2018, accompanied by a letter from the High Commissioner which makes clear his determination to, 'foster an environment in which everyone feels safe and free to come forward and speak up, and to protect colleagues who report misconduct or engage in any other protected activity'.[74] The new instruction extends the timeframe for staff seeking protection from 90 days to 6 months, and covers the risk of retaliation against staff, as well as actual retaliation or threat of retaliation.[75]

All staff interviewed for this review were aware of the mandatory responsibility to report incidents of sexual exploitation and abuse. A number of Protection staff spoke about the tension between this responsibility, and case management norms for incidents of sexual and gender-based violence (SGBV), which mean that 'all actions and services provided to the survivor should be guided by respect for wishes rights and dignity of the survivor'.[76] This tension is one which is acknowledged in the IASC Best Practice Guidance on Community-Based Complaints

[72] *Sexual harassment: where to go for help https://intranet.unhcr.org/content/dam/unhcr/intranet/organization-leadership/sea/documents/english/Where%20to%20go%20for%20Help%20FINAL.pdf*
[73] *Administrative Instruction on Protection against Retaliation, UNHCRIAI/2018/10. Date of entry into force 1 September 2018*
[74] *Message to all colleagues in HQ and the field from the HC titled New Administrative Instruction on Protection against Retaliation, 31 August 2018*
[75] *From Sexual exploitation, abuse and harassment: Frequently Asked Questions (undated)*
[76] *Quoted from draft standard operating procedures in country operation*

Mechanisms on UNHCR's intranet site, which suggests that staff 'inform the survivor of the mandate to report on SEA before proceeding with complaint intake'.[77]

UNHCR has a clear commitment to facilitating reporting on sexual exploitation and abuse by persons of concern. Objective 1 of UNHCR's new strategy on SEA and SH is about strengthening community-based complaints mechanisms (CBCM) for persons of concern;[78] responsibility for this rests with PSEA Focal Points. A survey conducted by DIP and DPSM in 2018 found that the main mechanisms used in-country to gather feedback from persons of concern on any issue were face to face (80 per cent), email and suggestion boxes (61 per cent), and hotlines (39 per cent).[79] According to staff and partners interviewed for this review, the main mechanisms available for persons of concern to report incidents on sexual exploitation and abuse are the same: in-person reporting (to UNHCR staff and to the staff of implementing partners, community outreach volunteers, women's leaders or camp coordination leadership), email, suggestion boxes and hotlines. Complaints can also be made directly to IGO via a complaints page on the agency's internet site.[80]

Guidance provided by UNHCR's Ethics Office to PSEA Focal Points on establishing CBCM states that 'participation, not just consultation of community members in setting up complaints mechanisms, is of paramount importance to ensure they experience ownership of the project, and will more easily engage in designing a complaints mechanism with which they feel comfortable and trust'.[81] However only 42 per cent of PSEA Focal Point survey respondents agreed that communities have been engaged in developing CBCM. This aligns with findings from UNHCR's 2018 Accountability Survey which reported that only 48 per cent of operations consult persons of concern on their preferred methods of giving feedback.

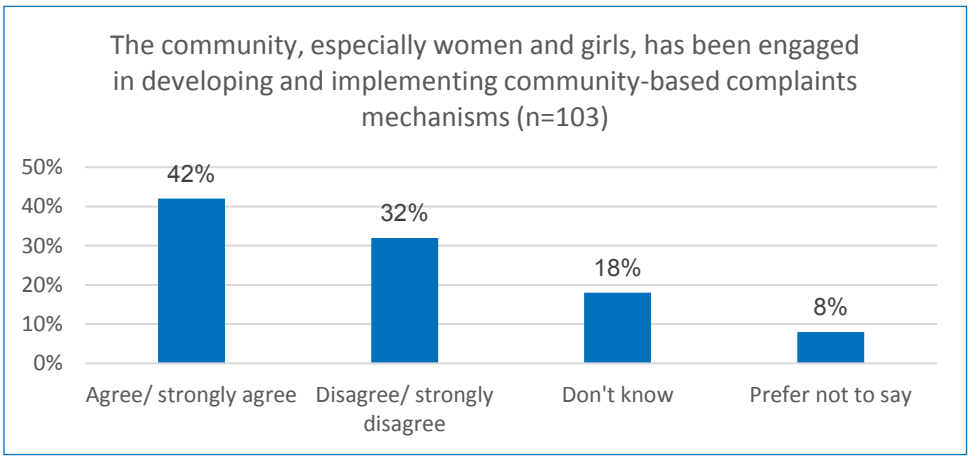


Figure 2

Awareness of community-based complaints mechanisms amongst persons of concern who took part in this review was mixed. Some had heard of or seen complaints boxes, either in UNHCR or partner premises, and some were aware of the existence of hotlines. Others had experience of in-person complaints mechanisms. But for many, mechanisms for reporting complaints in general were simply not known. Even where the reporting mechanisms

[77] Best Practice Guide: Interagency Community-Based Complaint Mechanisms *April 2016 IASC Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse* *https://interagencystandingcommittee.org/system/files/best_practice_guide_inter_agency_community_based_complaint_mechanisms_0.pdf p23*
[78] *UNHCR Addressing Sexual Exploitation and Abuse and Sexual Harassment Strategy and Action Plan 2018*
[79] *Accountability Survey Report October 2018, UNHCR*
[80] *https://www.unhcr.org/igo-complaints.html (English, French or Spanish translations available only)*
[81] *Protection from Sexual Exploitation and Abuse: Facilitators Training Manual, UNHCR Ethics Office, May 2016*

themselves are known, barriers to reporting exist. The review noted that staff and persons of concern experience similar systemic barriers to reporting (Table 2):

BARRIER	PERSONS OF CONCERN	STAFF
Confidentiality	Concerns about complaints leaking to the alleged perpetrator, or to family members and the wider community.	Concerns about complaints leaking to the alleged perpetrator, or to their manager
Being seen as a trouble-maker	Concerns about the impact of reporting on receipt of future services from UNHCR or partner organisations	Concerns about the impact of 'speaking up' on working relationships and future job opportunities in UNHCR
Assurances on safety and security	Concerns about safety and security when a report is made, and protection against the risks of further victimization	Concerns about what happens when a report is made, either to the complainant or to the person about whom a complaint is being made
Scepticism about impact	Scepticism about the difference that reporting makes, in terms of stopping the abuse, changing behaviour or removing the risk	Scepticism about the difference reporting makes in terms of disciplinary outcomes or dismissals
Social and cultural barriers to reporting	The shame and stigma of reporting exploitation and abuse	Some staff are uncomfortable with the expectation they will report concerns about sexual exploitation and abuse without any known 'facts'
Access	Cost, location, lack of attention being paid to the specific reporting needs of LGBTI people, children, people with disabilities, or those unable to read or write.	IGO perceived by some staff as 'distant' and unapproachable, a 'black box'

Table 2

Responsibility for ensuring access to safety, security and support for survivors rests with PSEA Focal Points. Their terms of reference include 'ensuring that SEA survivors have access to / are included in existing interagency referral pathways for SGBV survivors, thereby facilitating their access to medical, psychosocial, legal assistance, and to safe shelter and physical safety using a survivor-centred approach, while ensuring that adequate measures are in place to handle these cases with required additional care and confidentiality.'[82] In practice however, in the few instances where cases had been referred in the countries included in this review, the assurances that could be provided regarding the safety and well-being of survivors were recognised by staff as limited. Just over half of PSEA Focal Point survey respondents agreed that there is a community-based survivor referral and assistance programme in place for survivors, but only 40 per cent agreed that safety assessments had been undertaken to ascertain safety and security for survivors seeking police support and access to justice.

[82] *Terms of Reference PSEA Focal Points (field)*

4.5 Investigations and disciplinary outcomes

UNHCR is making efforts to strengthen investigations and disciplinary outcomes on SEA cases but a number of operational challenges remain.

Three key UNHCR functions are involved in the process from investigations to securing a disciplinary outcome: IGO, the Legal Affairs Service (LAS) and the Division of Human Resources (DHR), all of which are represented on the Emergency Task Force and Working Group.

The number of complaints of all types received by IGO is increasing, including an increase in allegations of sexual exploitation and abuse. IGO is under-resourced to deal with this increase. A benchmarking exercise conducted by the World Bank and presented at the Conference of International Investigators in Switzerland in September 2015 established an average of 5.5 cases per investigator for the UN and other international organisations. IGO staff interviewees reported caseloads of two to three times that level.

Sexual misconduct complaints received by IGO are routinely prioritised for investigation. In order to proceed with an investigation IGO needs to know the identity of the victim/survivor and secure their consent and cooperation for the investigation to proceed; the process of securing consent can be sensitive, complex and time-consuming. A significant proportion of complaints received by IGO are not substantiated (have insufficient evidence to reach a conclusion). Between 2013 and 2018, IGO registered 193 complaints, of which 68 cases were investigated. Of these, 29 (43 per cent) were not substantiated. The number of reports of sexual exploitation and abuse with an identifiable victim/survivor received by IGO increased significantly between 2017 and 2018 (from 39 in 2017 to 117 in 2018).[83] The reasons for this increase are not clear, and outside the scope of this review. However it is recognised that an increase in reporting does not necessarily correlate to an increase in the number of incidents; it may instead indicate increased awareness of and trust in reporting mechanisms by persons of concern, and/ or UNHCR staff.

IGO staffing, formerly resourced by non-experts on rotation, has become increasingly professionalised over recent years with an increase in the number of staff with investigations backgrounds and experience. There is no specialist SEA unit in IGO, although 90 per cent of SEA complaints are allocated to four SEA Focal Points, three of whom are women. All IGO staff have received some training on SEA investigations, but the review found not all of the SEA Focal Points have the necessary levels of training or experience required for the role.

IGO aspires to provide a survivor-centred approach to investigations for both staff and persons of concern. The review found good examples of investigations being conducted in sensitive and considerate ways, but no documented consensus on what a 'survivor-centred investigation' might mean. The review notes however that DIP is currently leading a cross-functional review of existing mechanisms and protocols to protect and ensure the safety, security and well-being of victims/survivors and witnesses of SEA and SH in the context of internal administrative investigations.

UNHCR currently requires 'clear and convincing evidence' for disciplinary action to be taken against an alleged perpetrator. This standard of proof is often difficult to achieve in SEA cases, and the absolute number of dismissals from UNHCR as a result of sexual exploitation and abuse is small. Twenty-one investigations into sexual

[83] *Figures provided in written comment (v2 CC32)*

exploitation and abuse were finalised in 2018, of which four cases were substantiated. One involved UNHCR personnel and three involved partners. The UNHCR personnel was dismissed. The review team understands that LAS is conducting research on the evidentiary threshold in a number of jurisdictions, to ascertain the range from 'clear and convincing' to 'balance of probabilities' (any revision of evidentiary thresholds would need to be done as part of a UN-wide effort to ensure compatibility). Very few insights from investigations outcomes are shared with staff, missing opportunities for organisational learning or to build staff confidence in the difference reporting can make.

Finally, the review notes that it encountered some challenges in accessing a single robust data source on the number and progress of SEA complaints over time, from receipt of a complaint to disciplinary outcome. Overall the review found that the systems used for logging, storing, analysing, collating and reporting on SEA cases lack consistency across the agency.

4.6 Partners and vendors

UNHCR has contractual arrangements with over 900 partner organisations working directly with persons of concern, as well as vendors (suppliers). All partners and vendors have obligations relating to PSEA, but UNHCR's capacity to build and monitor third-party capacity on PSEA is limited.

The engagement of UNHCR partners in PSEA is core to the elimination of sexual exploitation and abuse. In the first nine months of 2018, UNHCR received 78 allegations of sexual exploitation and abuse that reached the threshold of sufficient evidence for investigation. Of these 78 allegations, 25 concerned personnel from UNHCR (32 per cent) and 53 related primarily to partner organisations implementing UNHCR programmes (68 per cent).

Multiple stakeholders in UNHCR are involved in the appointment and retention of more than 900 partner organisations. A Project Partnership Agreement (PPA) describes the nature of the agreement between UNHCR and each implementing partner, and guidance for staff on preparing PPAs written in 2017 requires that 'all reasonable measures should be put in place to prevent exploitation and abuse of refugees and other persons of concern by Partner personnel'.[84] The PPA template[85] also requires that partners 'shall undertake all reasonable measures to prevent their personnel from exploiting and abusing refugees and other persons of concern and from engaging in any form of behaviour that could amount to misconduct. The failure to take effective measures to prevent such abuse or other misconduct, or the failure to investigate allegations or to request UNHCR investigative support of the same and to take disciplinary and corrective actions when misconduct is found to have occurred, shall constitute grounds for termination of this Agreement.' UNHCR has also recently launched a new checklist to facilitate 'assessment of the PSEA capacity of partners during the selection process and the PPA'.[86]

Monitoring of partner performance against PPAs is conducted by Protection and programming staff, or sector experts, in country and field offices. Responsibility for ensuring the 'proper monitoring and reporting on PSEA,

[84] *How to Prepare Partnership Agreements Guide (December 2017): https://intranet.unhcr.org/content/dam/unhcr/intranet/staff%20support/implementing-partnerships/documents/user-guides/How%20Prepare%20Partnership%20Agreements%20-%20Guide.pdf*
[85] *Project Partnership Agreement template https://intranet.unhcr.org/content/dam/unhcr/intranet/staff%20support/implementing-partnerships/documents/project-partnership-agreements/tripartite/Trip-NGO-PPA_ENG-BY%202017.pdf*
[86] *Checklist for assessment of the PSEA capacity of partners during the selection process and the PPA https://intranet.unhcr.org/en/policy-guidance/administrative-instructions/unhcr-ai-2019-1.html accessed 24 February 2019*

including the functioning of joint CBCMs'[87] and for negotiating standard operating procedures (SOPs) between and with multiple partner organisations in reporting allegations or concerns about sexual exploitation and abuse has been delegated to PSEA Focal Points. PSEA Focal Points and IGO are responsible for providing training and advice to partners on SEA prevention, response and investigations, respectively. However interviews with staff and partners in-country found considerable variation in the extent to which partners are being monitored or supported on PSEA activity including investigations. Only 35 per cent of respondents to the PSEA Focal Point survey agreed that there was a mechanism in place to regularly assess partner implementation on PSEA. Overall it is not clear where in UNHCR ultimate responsibility for partner activity on PSEA really lies.

UNHCR vendor (private sector supplier) contracts also include specific reference to vendor obligations on PSEA, making clear that the supplier relationship will terminate if these conditions are breached: 'The failure by a supplier to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement.'[88] [89] In practice the review found some lack of clarity about responsibility for assessing or monitoring vendor compliance on PSEA.

4.7 Learning from others

Existing mechanisms for learning from others and sharing meaningful insights on PSEA across the humanitarian sector are limited.

As previously mentioned, one of the challenges of the review was obtaining insights into the detail and implementation of PSEA policies and procedures of other humanitarian organisations, for the purposes of meaningfully benchmarking UNHCR's performance. Responses to the benchmarking survey conducted for this review suggest that many humanitarian organisations are stepping up action on PSEA, adopting broadly similar approaches to those being taken by UNHCR, and facing similar challenges. An assessment of the implementation and effectiveness of PSEA in other agencies was outside the scope of this review, but it was noted that there are some useful practices to share. These include:

- The harmonisation of policy frameworks and the strengthening of Codes of Conduct on PSEA. As in UNHCR, several agencies have multiple policies and procedures related to PSEA, which some are combining into a single coherent framework that incorporates ethical standards, policy guidance and practical actions.
- The development of management accountability tools to monitor, assure and certify management compliance on PSEA.
- The use of new technologies (phones and apps) for reporting concerns about sexual exploitation and abuse.
- Increasing agency transparency including publishing anonymised details of investigations and sanctions.

[87] *Planning for the Protection from Sexual Exploitation and Abuse: supporting document to Administrative Instruction on Reporting on 2016, Implementation in 2017 and Planning for 2018-19 UNHCRAI/2017/1*
[88] *UN Supplier Code of Conduct, https://intranet.unhcr.org/content/dam/unhcr/intranet/staff%20support/procurement/documents/english/vendor-management/vendor-registration/UN%20Supplier%20Code%20of%20Conduct.pdf, accessed 21 February 2019*
[89] From General Conditions of Contract: Contracts for the Provision of Goods and Services, UNHCR https://www.unhcr.org/uk/admin/sts/4c28a2fd6/general-terms-conditions-goods-services.html accessed 25 January 2019

5. Conclusions

UNHCR's 2018 Strategy and Action Plan on Sexual Misconduct makes clear that sexual exploitation and abuse of persons of concern is a betrayal of the agency's *protection mandate*, and the elimination of SEA requires changes in both *individual behaviour*, and *agency culture* (Figure 3).



Figure 3

Agency culture

The review has found that some elements of effective culture change on PSEA[90] are in place, and some are not:

- The foundations of culture change on PSEA in UNHCR are well established. There is a strong sense of urgency (articulated by the leadership, the Emergency Task Force and Working Group in particular), a clear vision, and a genuine commitment by leaders and staff to the elimination of sexual exploitation and abuse of persons of concern.
- The accountabilities and responsibilities of managers are being clarified and there is some targeted management development in place, though mixed levels of management engagement remain.
- The agency is making efforts to shift its approach to internal communications about PSEA from a top-down to a more conversational and dialogic approach, and to develop processes and mechanisms that will encourage staff to report. Staff want more opportunities to talk about PSEA in UNHCR (not just to report), and systemic barriers to reporting remain, a number of which relate to staff experiences of organisational culture.
- The agency has allocated people and budget to shifting culture and practice on PSEA but it is not clear that these are adequate for driving the culture change required. For instance, the cross-functional governance of PSEA in UNHCR reflects the need for multi-stakeholder ownership of an effective solution, but lacks some clarity in practice. The agency has appointed a Senior Coordinator, but the position is a temporary one. IGO has become increasingly professionalised over recent years, but appears under-resourced overall and in terms of specialist SEA experience.
- UNHCR organisational partners have a vital role to play in PSEA. Some UNHCR staff would like to do more to support partners to build their capacity in terms of raising awareness and conducting investigations, but lack a clear strategy and resourcing to do so.
- Above all, effective culture change requires broad-based ownership of the change. UNHCR's intention in 2009 was to mainstream PSEA, but in practice ownership currently rests with a small number of people in

[90] *See for instance UN Lab for Organisational Change and Knowledge (UNLOCK) Change Management Model September 2018, available via https://www.unssc.org/featured-themes/united-nations-laboratory-organizational-change-and-knowledge-unlock/*

the agency. PSEA Focal Points are de facto responsible for PSEA on a day-to-day basis – they are working hard to make a difference but their responsibilities are extensive and many lack the seniority required to influence culture and behaviour both internally and externally.

Individual behaviour

Most of the recent agency effort on PSEA has been focused on changing individual behaviour, particularly in relation to encouraging staff to report concerns about sexual misconduct:

- UNHCR has mandated staff learning and development on PSEA through on-line training and through including PSEA in the annual Code of Conduct refresher sessions. Some targeted learning and development is being provided (for instance to PSEA Focal Points and investigations staff), and a new learning programme on culture change is being developed for some managers.

- Efforts are being made to incorporate PSEA into the job descriptions of some staff groups, but few staff or managers currently have PSEA in their job descriptions or performance goals. Despite the agency's intention that PSEA should be 'everybody's responsibility', not all staff see it as one of their core responsibilities.

- Two key elements in effecting individual behaviour change are missing. The first is examples of positive, PSEA-enabling behaviours. The focus of attention to date in the agency has been on changing staff behaviour around reporting, and less attention has been paid to describing staff behaviours that will prevent sexual exploitation and abuse and contribute to a culture of zero tolerance other than reporting. Second, there is limited evidence which would be visible to staff of action being taken against those who commit SEA or who contribute to a culture which enables SEA. The number of allegations being heard by IGO is increasing and the agency is taking steps to translate this into an increase in disciplinary outcomes, but the low numbers of substantiated cases mean sanctions for poor behaviour on SEA lack clarity and impact.

Protection priority

The review has also found that whilst PSEA is clearly understood as a protection risk, this is not currently translating into it being approached as a protection priority:

- UNHCR currently employs more than 16765 staff[91] of whom around 4000 work in Protection roles. Day-to-day responsibility for PSEA has been delegated de facto to fewer than 300 PSEA Focal Points, most of whom are Protection staff, representing less than 2 per cent of UNHCR's global workforce. This means that PSEA is not understood by all Protection and programming staff as one of their core responsibilities. This siloed structure and approach is unlikely to deliver the outcomes on PSEA that UNHCR is seeking.

[91] https://www.unhcr.org/ph/figures-at-a-glance *accessed 14 May 2019*

- The balance of recent effort on PSEA has largely been on policies and procedures relating to staff reporting and organisational culture, and to supporting persons of concern in terms of reporting and response. Less clear and less visible in the agency's renewed efforts on PSEA are efforts relating to working with persons of concern to prevent sexual exploitation and abuse in the first place. UNHCR's capacity to provide assurances to victims/survivors and witnesses regarding their safety and security is often limited, and this is likely to be a significant deterrent to reporting.

- UNHCR genuinely wants persons of concern to feel able to report any concerns about sexual exploitation and abuse. However, factors such as the delegation of PSEA responsibility to Focal Points, unclear prioritisation and accountability for PSEA, and in some cases a lack of confidence amongst staff in terms of engaging with persons of concern on SEA all mean opportunities to raise awareness, assess risk and encourage reporting are being missed.

Recommendations

	RECOMMENDATION	RESPONSIBLE	ANTICIPATED TIMESCALES
1	**UNHCR to reiterate its commitment to mainstreaming PSEA throughout every aspect of its operations.** In addition to continuing with the clear and consistent messaging to staff at all grades that the protection of persons of concern from sexual exploitation and abuse is indeed 'everyone's responsibility', UNHCR should reinforce these messages by emphasising the specific shifts in agency culture and individual behaviours that are needed and by enhancing the mechanisms and resourcing required to ensure mainstreaming happens in practice at individual, functional, programmatic and institutional levels.	UNHCR leadership	1 – 24 months
2	**UNHCR to continue the dialogic and diagnostic work of clarifying responsibilities and accountabilities for PSEA across the agency.** Further work is needed in relation to establishing clear institutional governance of PSEA (at HQ, regionally and in-country), including clarifying the different roles and contributions of stakeholders in the HQ Emergency Task Force to achieving the agency's vision of eliminating sexual exploitation and abuse. Individual accountabilities need to be made more explicit. As a priority, this means including PSEA in the responsibilities of leaders and managers in the newly-created regional entities and in-country, and in the role descriptions of all Protection and programming staff. Functional responsibilities for PSEA management (including the role of the Division of International Protection - DIP) need to be clarified and agreed. Mechanisms for strengthening responsibilities and accountabilities should be developed, including but not limited to amendments to written frameworks and tools.	Emergency Task Force	1 – 6 months
3	**UNHCR to continue to resource a Senior Coordinator role for the foreseeable future**, with responsibility for facilitating development, coordination, collaboration, ongoing review of and learning from the agency's	UNHCR leadership	1 – 6 months

	strategy and plans on PSEA. The Senior Coordinator to continue to report into the Executive Office and have the ongoing support of an operational PSEA Working Group.		
4	**UNHCR to strengthen and further develop the network of PSEA Focal Points across its operations.** The number of PSEA Focal Points in different operations will need to take into account the size and nature of the operation, but the expectation is that each country operation will continue to have PSEA Focal Points, and that these will be resourced at a sufficiently senior level to ensure both an effective mainstreaming approach internally, and effective PSEA management in protection and programming. At HQ level the Senior Coordinator, Ethics Office, DIP and other functional stakeholders to agree between them the distribution of roles and responsibilities in developing and supporting the performance and impact of the PSEA Focal Point network.	Emergency Task Force	1 – 12 months
5	**The next iteration of the 2018 Strategy on SEA and SH to pay more explicit attention to addressing PSEA as a protection priority.** This includes ensuring an inclusive victim-centred approach to PSEA that recognises and addresses the needs of all persons of concern including paying specific attention to marginalised groups such as LGBTI people, children, people with disabilities, ethnic minorities, people who cannot read or write. Included in the strategy should be a review of the effectiveness of communications and awareness-raising activities with persons of concern on PSEA, and of the effectiveness of current community-based complaints mechanisms in preventing and responding to sexual exploitation and abuse. The strategy should also include greater emphasis on risk assessment and mitigation, and on action to increase the safety and security of survivors.	Emergency Task Force	1 – 6 months
6	**UNHCR to continue the work to ensure a coherent policy framework on PSEA.** The agency should continue to ensure alignment of and between the range of institutional policies relevant to PSEA. It should also consider a review of its Code of Conduct to ensure consistency with the approach on PSEA.	Emergency Task Force	1 – 12 months

7	**UNHCR to build a global learning and development strategy on PSEA.** The strategy to incorporate staff feedback on existing mandatory training to increase its relevance and impact. It should strengthen targeted training for specific roles such as PSEA Focal Points and investigations staff. It should also ensure the integration of PSEA content into existing learning and development, for instance management and leadership development, and existing training for protection and programme staff.	Emergency Task Force	1 – 24 months
8	**UNHCR to continue action to strengthen staff reporting mechanisms.** This includes taking action to engage staff in feedback on and design of reporting procedures and mechanisms, as well as raising awareness of and continuing to strengthen mechanisms to assure staff safety and security.	Emergency Task Force	1 – 12 months
9	**UNHCR to revisit the resourcing of and approach to third-party (partner and vendor) capacity on PSEA.** The agency to develop a strategy and tools which emphasise collaboration with partner organisations as advocates and allies in PSEA, over increasing control and accountability. UNHCR to designate a named entity to lead the implementation of the requirements under the UN Protocol on Partners. This may be an existing entity or a new one, for instance UNHCR may wish to consider establishing a Partner Advisory Panel, including partners as members, whose first action should be to prioritise local and international Partners for monitoring and capacity-building on PSEA, based on an assessment of the extent of direct contact with persons of concern. PSEA Focal Points should be encouraged to develop collaborative approaches with other UN agencies for localised training, support and monitoring of those Partners which have the highest contact with persons of concern, and low PSEA capacity. A strategy and tools are also needed to identify and prioritise vendors for capacity-building and compliance-checking on PSEA, based on a similar assessment of the extent of direct contact with persons of concern.	Emergency Task Force	1 – 12 months
10	**UNHCR to review the budgets and resourcing of PSEA, including the Ethics Office, Senior Coordinator's team and the Division of International Protection. As a priority the agency should review**	UNHCR leadership	1 – 12 months

	the resourcing of IGO and LAS to ensure the ongoing prioritisation and efficient expediting of sexual misconduct cases. IGO should continue efforts to enhance its expertise in investigating SEA, including by drawing on external expertise as necessary, to increase capacity and knowledge in SEA investigations. Assigning female investigators to interview female survivors should be the default, subject to immediate availability, and this requirement should be taken into account in resourcing plans. UNHCR should remain engaged in efforts within the UN system to address barriers posed by the evidentiary threshold for establishing sexual misconduct.		
11	**UNHCR to contribute to, encourage and support inter-agency mechanisms and culture to facilitate greater collaboration on PSEA** and greater transparency in the exchange of current practices and learning on PSEA across the UN system. The High Commissioner to use the agency's forthcoming term as IASC Champion to encourage mainstreaming of PSEA in all areas of humanitarian response, prioritising the theme of culture change on PSEA at organisational and system-wide levels, and evolving and reporting on shared metrics of progress on PSEA.	UNHCR leadership	1 – 24 months
12	**UNHCR to continue to proactively discuss PSEA with donors.** In the spirit of Grand Bargain[92] commitments, efforts to streamline PSEA reporting requirements with donors should continue. Guidance should be developed on integrating PSEA activities in the UNHCR Global Report and Global Appeal.	UNHCR leadership	1 – 24 months

[92] https://interagencystandingcommittee.org/grand-bargain-hosted-iasc

Annex 1: Terms of reference for the review

Sexual Exploitation and Abuse: An Evaluative Review of
UNHCR Prevention and Response Mechanisms

DRAFT Terms of Reference

1. Introduction

The prevention of, and response to, Sexual Exploitation and Abuse (SEA) has been a UNHCR priority for many years. UNHCR's longstanding commitment to protecting refugees and other persons of concern from SEA is reflected in a series of measures including prevention, awareness-raising, effective investigation, survivor and whistle-blower protection, and robust action against those found to have engaged in SEA.

SEA is the result of (an abuse of) fundamentally unequal power relations, such as those that exist in humanitarian operations between the beneficiaries and the providers of assistance. The risks of SEA increase in situations of forced displacement, often characterized by large scale separation of families and a disruption of habitual protective social structures. The decreased social control, and a (perceived) lack of rule of law in the areas of displacement, further aggravate the risks of SEA for displaced populations.

UNHCR, as part of its mandate, has a well-developed institutional awareness of Sexual Exploitation and Abuse as a grave protection risk for the persons of concern; the exploitation and abuse causing suffering that includes negative social consequences, and further protection risks, for the survivors.

UNHCR has continuously taken measures to improve the Prevention of and response to Sexual Exploitation and Abuse (PSEA) of persons of concern. As part of these efforts, the High Commissioner (HC) decided to commission an evaluative review of "UNHCR's existing procedures and policies on sexual exploitation and abuse, to identify lessons learned, identify gaps, inform our ongoing response, and make recommendation for improvements."

2. Background and Context

In 2003, the Secretary General (SG) issued a Bulletin (ST/SGB/2003/13) prohibiting Sexual Exploitation and Abuse (SEA). This Bulletin also sets the responsibilities of all managers to prevent SEA, to take appropriate actions, "where there is reason to believe" sexual exploitation and abuse have taken place, and to report through proper channels.

On 13 November 2003, the UNHCR Director of Human Resource Management (DHRM, now DHR) issued IOM/FOM-77/2003 on the SG's Bulletin: special Measures for Protection of SEA, reiterating that the Bulletin is legally binding on all staff. The IOM/FOM and SG's Bulletin should be read in conjunction with the existing UNHCR Code of Conduct (IOM/60-FOM/56- 2002).

In April 2009, the HC appointed the Director of the Ethics Office as the SEA focal point for the Organisation. The SEA focal point reports directly to the HC on all relevant issues related to SEA.

Following an independent report on allegations of SEA committed by peacekeepers in the CAR between 2013 and 2015, the SG set up several working groups in order to put measures in place to strengthen investigations of SEA, and improve prevention and response to victims.

Within the Inter-Agency Standing Committee (IASC), the Deputy High Commissioner participates in the IASC Senior Focal Points meetings on PSEA, led by the Director General of IOM, William Swing. UNHCR is a member of the Inter-Agency Standing Committee (IASC) AAP/PSEA Task Team. The IASC Task Force on Accountability to Affected Populations (AAP) was created by the IASC in July 2012. The IASC Task Force on Protection from Sexual Exploitation and Abuse (PSEA) by humanitarian workers was established in January 2012. Since January 2014, these 2 tasks force were combined as the IASC AAP/PSEA Task Team, and UNHCR, through the Division of International Protection, acts as Co-Chair.

In 2017, the SG announced additional measures on PSEA, including a report: 'Special Measures for Protection from Sexual Exploitation and Abuse: a new approach' which outlines vigorous changes for the UN as a whole. A Special Coordinator on Improving UN Response to SEA was appointed as well as a Victims' Rights Advocate.

UNHCR participates in and continues to contribute to all initiatives and measures introduced by the Special Coordinator's Office; particularly on victim assistance, strengthened reporting and information-sharing, the protocol on allegations involving Implementing Partners, and the vetting/screening of candidates for vacant posts.

UNHCR has established some good practices. Notably, UNHCR has integrated PSEA activities into its programme of work, requiring every office to provide PSEA training to staff, partners, outreach to communities and designing with community members' community-based complaints mechanisms. UNHCR has a system of PSEA focal points who can use an online platform to exchange good practices and to keep up to date on the PSEA policy and activities. The PSEA Focal Points network includes over 300 PSEA Focal Points and their Alternates from all offices world-wide. Terms of Reference for PSEA Focal Points (and Managers) were drafted and shared with the country operations and Headquarters for comments and finalized in October 2017.

The specific roles of Offices, Senior Managers, PSEA focal points and staff in relation to planning, budgeting and implementing PSEA activities are included in the UNHCR/AI/2017/1 Administrative Instruction on Reporting on 2016, Implementation in 2017 and Planning for 2018-2019, with an Annex on Planning for Protection from Sexual exploitation and Abuse 2018.

The High Commissioner and Deputy High Commissioner have prioritized communications with all personnel to inform them of UNHCR's approach to combatting SEA, including multiple instructions on UNHCR's Zero tolerance Policy, outlining staff's obligations and announcing new initiatives. In March 2018, a Senior Coordinator for Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment was nominated within UNHCR, reporting to the Deputy High Commissioner. She is assisted by a SEA/SHA Working Group composed of representatives from the Ethics Office, the Legal Affairs Service (LAS), the Inspector General's Office (IGO), the Division of External Relations (DER), the Division of Human Resources (DHR) – including the Staff Health and Welfare Service (SHWS) and the Global Learning Centre (GLC), the Ombudsman's Office, the Department of Emergency, Security and Supply (DESS) through the Field Safety Service (FSS), and the Division of International Protection.

A SEA/SHA Emergency Task Force under the leadership of the Deputy High Commissioner was created and its members are the UNHCR Spokesperson, the Inspector General, the Principal Counsel, the Ethics Director, the Director of DHR, the Director of DIP, the Ombudsman, the Special Assistant to the HC and the Senior Coordinator.

3. Rationale and objectives

Notwithstanding the good practices, measures and initiatives taken, SEA is a continuous risk for UNHCR's persons of concern. In 2017, the IGO, the authority in UNHCR that investigates SEA, received 39 allegations, during the first quarter of 2018, 21 allegations were received.

There is therefore a need to review the existing policies and approaches and identify possibilities for improvement.

The High Commissioner, on 20 March 2018, commissioned an evaluative review of "UNHCR's existing procedures and policies on Sexual Exploitation and Abuse, to identify lessons learned, identify gaps, inform our ongoing response, and make recommendation for improvements."

The objectives of the evaluative review are:

a) To benchmark and compare UNHCR's policies and guidance on PSEA with the current standards within the UN, selected NGOs, and the international aid system to establish where improvements, or new approaches, are needed.
b) To assess the extent to which resources assigned to PSEA, the organizational structure to advance PSEA, and the activities and plans to prevent and respond to SEA are adequate and appropriate.
c) To assess, using examples from country operations, the extent to which UNHCR's prevention and response activities are effective and timely.
d) To identify existing practices of what works well (or not) and why, and explore ways of sharing these examples across the organization.

The results of the evaluation are expected to:

a. Provide a list of key recommendations, and next steps to be taken in order to strengthen the organization's SEA approach with an emphasis on prevention-/capacity building, accountability, investigation practices and disciplinary processes, including the support to, and protection of, victims.
b. Provide actionable recommendations on PSEA for specific situations in humanitarian/emergency operations, taking into account changing assistance modalities (e.g. cash based interventions).

4. Scope and Methodology

The scope of this review is limited, it takes stock of the existing PSEA policies and measures; it is not a comprehensive evaluation of the risks of, and response to, PSEA in UNHCR operations.

The review of the existing PSEA procedures and policies will be managed by the Evaluation Service in close collaboration with the Senior Coordinator for Prevention and Response to Sexual Abuse and Exploitation and Sexual Harassment, with the support, and under the overall guidance, of the Emergency Task Force on Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment, chaired by the Deputy High Commissioner.

The review will be carried out through primary and secondary data collection. Data sources will include (but are not limited to):

- Instructions, IOM/FOMS, manuals and policies related to PSEA;
- Relevant reports-, or planning documents, regular or ad-hoc, on aspects related to PSEA: FOCUS, MSRP, ARP, Protection Reports, etc;
- Relevant internal reviews, such as the ones being carried out by the Bureau for Middle East and North Africa (MENA) on SEA in the Syria and Iraq situations, etc.
- Relevant external reviews and reports by UN agencies, NGOs, donors, the UN Special Coordinator, the IASC Taskforce on PSEA/AAP, etc.

The secondary data review will be substantiated by primary data collection through interviews with relevant UNHCR staff at HQ, and in field operations. Participating staff will include those in managing/policymaking positions, as well as operational staff

- Staff of pre-selected UN agencies and NGOs will also be included.

In order to foster a participatory approach, representatives of the beneficiary populations in selected field operations will also be interviewed.

In light of the sensitive nature of the subject, and potential for stigmatization of those interviewed, due care will be exercised to ensure confidentiality, including the way interviews are organized.

The method/indicators used to measure effectiveness and impact will be designed to account for the fact that incidents of SEA are under-, or not- reported, and an increase of reported incidents could actually indicate improved access for victims to support mechanisms (and not an actual increase in the number of incidents).

5. Key Evaluation Questions:

1. How do UNHCR's PSEA policies and procedures compare to those current in other UN agencies and other members of the international aid community, including NGOs?
    a. How effective are UNHCR policies and procedures compared to those of other selected UN agencies and NGOs?
    b. What are the key strengths and weaknesses of UNHCR PSEA policies and procedures compared to those of other selected UN agencies and NGOs?
    c. Are there good practices from other selected UN agencies and NGOs that could be replicated by UNHCR?

2. To what extent have UNHCR's PSEA prevention and awareness activities been effective?
    a. To what extent is awareness/knowledge of PSEA policies and measures permeated among the staff?
    b. To what extent is PSEA a part of regular programme planning?

c. How does the office ensure PSEA awareness and prevention is part of the implementation arrangements with partners?
d. To what extent is PSEA integrated in the protection response?
e. To what extent does the Code of Conduct support the prevention and response of SEA?
f. Which tools among those put in place by UNHCR to prevent and raise awareness are considered by staff as most effective?
g. What are the key gaps identified by staff when it comes to SEA prevention and awareness raising?

3. To what extent do regular community based protection activities (registration, complaint mechanisms, protection interviews, focus group discussions, protection monitoring, AGDM, etc.) contribute to the prevention, identification and reporting of SEA?
    a. To what extent does the office engage persons of concern in PSEA (information, prevention, response)?
    b. To what extent are reporting/complaint mechanisms effective?
    c. How is access for refugees to reporting mechanisms established/monitored?
    d. How are victims and witnesses effectively protected, both among staff and refugees?

4. To what extent is PSEA incorporated in UNHCR's risk management framework and practices?

5. In the country contexts reviewed, are there specific examples in which the workforce composition/profile, or the working environment had a positive, or negative, impact on prevention and response mechanisms? For example:
    a. To what extent did the office dynamics and workforce profile (gender and functional diversity) impact prevention and response?
    b. To what extent did management decisions impact effective prevention and response activities?

6. To what extent are investigations, and disciplinary measures, carried out in a qualitative, timely and effective manner?
    a. To what extent are the IGO and LAS adequately structured and equipped to respond to allegations of SEA?
    b. To what extent are implementing partners advised and guided when conducting SEA investigations?
    c. To what extent are personnel, including staff and affiliate workforce, and implementing partners vetted to exclude those involved in SEA?

6. Evaluation Team

The evaluative review will be undertaken by a team of 4 qualified external consultants, supported by the UNHCR Evaluation Service, under the overall guidance of the Senior Coordinator for PSEA.

The consultants will be selected through a committee comprised of the Senior Coordinator for PSEA, the Evaluation Service, IGO, Ethics and DIP.

7. Timeline and Deliverables

The evaluation should be completed within 5 months from the date of signing the contract (October 2018). Key deliverables of the evaluative review are:

1. Inception report, confirming the scope of the evaluation, the methods to be applied and details on the analytical framework developed for / used in the evaluation.
2. Final evaluation report including recommendations, and workshop/presentation.
3. Executive summary (drafted as stand-alone document).
4. The final report will be a public document.

Annex 2 PSEA Focal Point survey

PSEA Focal Point role
I/The FP in my location volunteered for the FP role
I/The FP has an alternate for when s/he is not available
There was a competency-based interview process for my selection/ selection of the FP
I/the FP in my location received initial induction / training for the role
I/the FP in my location receives ongoing training for the role
I/the FP in my location is allowed extra time from normal duties to fulfil the role
I/the FP in my location is provided with extra compensation for undertaking the role
My role/ the role of the FP is clear
FP responsibilities are included in the job description for FPs/ my job description
My/the FT responsibilities include:
- Receiving and reporting complaints
- Awareness raising on SEA among staff and communities of concern
- Addressing staff and community issues in relation to SEA
- Developing and monitoring CBCMs
- Monitoring and reporting SEA trends to management
- Training on PSEA
- Other (*free text box*)
FP responsibilities are included in the performance appraisal process and setting of targets for FPs/ my performance appraisal and targets
I am/the FP in my location is sufficiently supported by management to be successful in the role
• The FP in my location participates/ I participate in an internal UNHCR support mechanism (such as a community of practice)
• I/ the FP in my location participates in an external PSEA focal point coordination mechanism with other agencies
The FP role works well in practice overall
The FP network works well in practice overall
In your view, what are the main strengths of the FP role and network? *Free text box*
In your view, what are the main challenges of the FP role and network? *Free text box*
What suggestions do you have, if any, for improvements to the FP role and network for the future? *Free text box*
UNHCR policies and procedures – Management and Coordination
UNHCR leadership demonstrates a clear commitment to eliminating PSEA– at global level
UNHCR leadership demonstrates a clear commitment to eliminating PSEA – at regional level
UNHCR leadership demonstrates a clear commitment to eliminating PSEA – at country level
UNHCR leadership demonstrates a clear commitment to eliminating PSEA - at field office level
Senior managers regularly communicate their responsibility for PSEA – at the global level
Senior managers regularly communicate their responsibility for PSEA – at the regional level
Senior managers regularly communicate their responsibility for PSEA – at the country level
Senior managers regularly communicate their responsibility for PSEA - at the field office level
Senior managers at the country level visibly deliver on their responsibilities in relation to PSEA
Senior managers at the country level participate in a PSEA management team
The management task team has a clear PSEA action plan including shared management responsibilities
The PSEA action plan include regular trends analysis on agency-wide issues including, for example: agency culture; complaints; investigations; survivor support
There is a global level policy applicable to *all* staff stating standards of conduct with regard to prohibition of SEA, accompanied by procedural tools and guidelines
• The policy is regularly reviewed and updated as necessary
• There is a country level policy stating standards of conduct with regard to prohibition of SEA, accompanied by procedural tools and guidelines

• The policy is regularly reviewed and updated as necessary
• There is a fully budgeted strategy/action plan to implement the policy at country operations level
• The policy is regularly conveyed to all staff at all levels
• The policy is available to staff in all relevant local languages
• All contracts with external implementing partners, suppliers and contractors include the Code of Conduct and stipulations about agency response when the Code of Conduct is violated
• All contracts with external implementing partners, suppliers and contractors require them to communicate the COC and PSEA policy to people of concern whom they serve
• Any other comments on or recommendations for Management and Coordination of PSEA within UNHCR?
Engagement with communities, risk assessment, community-based mechanisms, and survivor support polices
The agency has disseminated translated and/or summarised versions of the COC and other PSEA policies to the community leaders, including women's leaders and women's groups and children's / youth groups
The agency regularly undertakes community-based risk assessments related to SEA across all community-based operations
The community is engaged in a meaningful way in on-going risk analysis
There is a mechanism for ensuring findings from risk analysis inform programmes
The agency ensures widespread and on-going community-based communication campaigns regarding PSEA, including what it is, how to report, and how to receive confidential care and support
The community, especially women and girls, has been engaged in developing and implementing community-based information and awareness raising regarding PSEA
The community, especially women and girls, has been engaged in developing and implementing community-based complaints mechanisms
The community, especially women and girls, has been engaged with monitoring the CBCMs
There are a variety of complaints mechanisms in place to facilitate confidential reporting
All agency staff working at the community level have been trained on basic survivor-centred approaches to engaging with local populations and referring potential complaints to community-based focal points
There are community-based focal points in place to receive concerns/complaints by community members
The community-based focal points are representative of different sections of the community, including women and youth and children for example
The responsibilities of the community-based focal points are included in their TORs and regularly assessed by their supervisors as part of their performance review
The community-based focal points receive regular and on-going training on PSEA, especially survivor-centred approaches to receiving and reporting a complaint
Information about PSEA, including complaints processes and survivor support, is displayed prominently in all service delivery sites supported by the organization
There is regular monitoring to ensure all community members are aware of how to submit a confidential complaint
There is a community-based survivor referral and assistance framework in place
Technical and financial resources have been allocated to service providers to ensure their capacity to provide no-cost safe, comprehensive and coordinated survivor support
This support includes: Material support Health care Psychosocial support Legal aid Security
Safety assessments have been undertaken to ascertain the safety and security for survivors seeking police support and access to justice
This support includes access to safe shelter/relocation as necessary
This support includes remunerations/reparations
Survivor support referral and assistance is regularly monitored for quality of care

There is a system in place to follow-up with survivors and a confidential data management system that keeps track of all case details
There is a clear community-based feedback mechanism for community members to share concerns about complaints and care and support mechanisms
Any other comments on or recommendations for Community Engagement on PSEA within UNHCR? *Free text box*
Engagement with staff, partners and contractors, and orientation and prevention procedures
There is a recruitment process in place that ensures background checks and other vetting mechanisms for all new staff (including local staff, volunteers, secondees, etc.)
There is a tracking system to avoid re-hire of staff, partners, suppliers and contractors who have committed SEA
All job advertisements reaffirm agency commitment to PSEA
All new hires are required to sign the COC and review agency PSEA policies and procedures prior to employment as part of staff induction
There is a mechanism in place to ensure staff understand the COC and PSEA policies and procedures as part of staff induction
There are contractual clauses and disqualifiers for PSEA-related misconduct
All supervisory processes include review of staff participation in regular COC training as well as other trainings on related issues, including rights, diversity, gender, etc.?
The agency has undertaken additional efforts to ensure an agency culture of zero tolerance for SEA, including regular staff assessments on SEA-related risks, attitudes, behaviours
All staff are regularly solicited/engaged in the design of these efforts, as well as in other prevention efforts to support agency-wide responsibilities for PSEA
All sector managers include SEA risk mitigation in the design and implementation of their programming
Sector programmes are required to submit information about SEA risk monitoring and mitigation in their regular reporting
Training on PSEA is regularly provided to implementing partners, suppliers and contractors on the COC and other PSEA policies and procedures
There is a mechanism in place to regularly assess partners, suppliers and contractors' abilities and activities to implement the COC and other PSEA responsibilities in their field operations
In line with community-based risk assessment findings, targeted programmes are supported that would reduce risk at the community level (e.g. livelihoods)?
Any other comments on or recommendations for Community-based mechanisms utilised within UNHCR *Free text box*
Agency complaints and investigations
The agency has undertaken efforts to ensure an agency culture that facilitates reporting and support to complainants
The agency has a whistle-blowing policy in place that ensures protection from retaliation including for witnesses
All staff are aware of and regularly reminded of the mandate to report
The agency has internal and independent, confidential channels through which UNHCR staff and related personnel can report concerns/complaints
All staff are aware of these channels
There are mechanisms for regularly monitoring practical barriers and use of complaints systems by staff, including soliciting input from staff about challenges and recommendations
The agency ensures that complaints are managed according to clear policies and procedures that are in line with global standards (e.g. the IASC Model Complaints and Investigation Procedures and Guidance)?
This includes guidance on support provided to witnesses who cooperate with investigations
All managers and focal points are trained in the complaints and investigations procedures
All managers are trained in when to report to the police, in line with survivor-centred principles
The agency has a specific team of staff trained in managing investigations (separate from the PSEA focal points)
Investigators have the necessary financial, technical, psychological and other support to carry out their functions

Investigations are fast-tracked to limit negative repercussions for complainants, witnesses and objects of investigation
Disciplinary measures are in place and activated when appropriate
There is an explicit mechanism for following up with complainants/survivors about the outcomes of investigations
There is an explicit mechanism for following up with witnesses about the outcomes of the investigations
There is an agency-wide monitoring mechanism in place to track investigation procedures and outcomes
Any other comments on or recommendations for Community-based mechanisms utilised within UNHCR? *Free text box*

Are there any other comments or suggestions / recommendations you would like to make to the evaluative review team in order to try and improve UNHCR's overall approach to the prevention of and response to PSEA?

Annex 3 PSEA Desk review findings

This desk review focuses on publicly available information about internal agency policies and procedures. It focuses on the Code of Conduct, Whistleblower Policy, Prevention, Survivor Support, Complaints and Investigations related to PSEA for 15 agencies. As noted in the methodology of this report, there were challenges accessing any materials other than those available online. As such, the information below should be treated as indicative. Where "not known" is denoted this does not mean a policy is not in place, but rather it was not possible to access it. Clear good practices that have been identified as of particular interest/learning to UNHCR (based on other findings from the evaluative review) are marked below with the following symbol:

In addition to the information gathered in the desk review, the *IASC Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse* has recently produced a PSEA mapping of system-wide UN good practices (available here), and of global initiatives (available here). OCHA intends to collect and publish UN good practices on a regular basis.

ORGANIZATION: ACTIONAID

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• Code of Conduct (2014) ActionAid's Code of Conduct provides clear guidance on what is expected of staff, and provides examples of conduct that are unacceptable. Employment and engagement with ActionAid is conditional on all staff signing and therefore agreeing to this Code of Conduct and its contents. ActionAid's Code of Conduct is binding to all staff. The Code of Conduct covers anyone representing ActionAid; staff, volunteers (including board and assembly members where relevant), consultants, interns, P4C staff, dependents accompanying international staff when on business, and other individuals representing ActionAid. Staff are responsible for managing their behaviour both in and out of work in accordance with ActionAid's values, policies and procedures and this Code of Conduct. • Areas covered in CoC: Protect the safety and wellbeing of self and others; Demonstrating Mutual Respect of others; Maintain high standards of personal and professional conduct; Personal conduct outside of work; Protection and use of ActionAid's assets, resources, and information; Avoid conflicts of interest and duty; Report any incident or concern relating to this Code of Conduct; Compliance to this Code of Conduct.
Whistleblower Policy	• Whistleblowing Policy (Effective June 2008): The policy covers the responsibility to report wrongful acts committed by staff of ActionAid and those of partner organisations. Wrongful acts in this sense are described as; Financial and procedural malpractice including those relating to mismanagement, misappropriation of funds, actual or suspected fraud or abuse of authority. Under this policy, it will be a disciplinary matter if a genuine whistleblower were to be victimised. While the policy does not specifically cover ex-employees of the organisation, reports received from ex-employees will be considered for investigation. • This policy outlines the reporting responsibility of all staff (details of who to report to); issue of confidentiality; how cases will be handled (timeline of receiving, responding and managing cases; roles and responsibilities of different stakeholders; reporting to donors and the Board, if and when required); false allegations (sanctions) and notification (responsibilities of HR and department heads to communicate the content and existence of this policy to all staff.
Prevention	• PSEA-specific prevention not known
Survivor Support	• PSEA-specific survivor support policy/framework not known
Complaints	• PSEA-specific complaints mechanism is not known.
Investigations	• PSEA-specific investigations mechanism is not known.

Other/Misc	• ActionAid Child Protection Policy (2007). The purpose of this policy is to ensure that ActionAid International has procedures in place to prevent and deal with child abuse and exploitation by any Affiliate, Associate or Country Programme of ActionAid International or the International Secretariat. This policy will apply to all ActionAid International staff and partner staff as well as supporters and donors and all ActionAid Board members. This policy outlines responsibilities of various entities within ActionAid International vis-à-vis the children that they work with. Annex includes forms of child abuse and exploitation, and how to recognise them; and guidelines for working with children in difficult circumstances.

ORGANIZATION: DANISH REFUGEE COUNCIL (DRC)

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• Code of Conduct (n.d.) • This Code of Conduct applies to DRC and to all its staff in relation to international programme activities. Both international, expatriate staff, HQ staff on mission, and local staff in the international programmes are obliged by this Code of Conduct. • The following sections are relevant to PSEA: *1.4.1 While acknowledging that local laws and customs may differ from one country to another, the Code of Conduct is based on international legal standards. Guidance on appropriate interpretation can be found in the Notes to the UNHCR Code of Conduct, in the UN Secretary-Generals Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13), and in the IASC Report on protection from sexual exploitation and abuse in humanitarian crises (13 June 2002).* *3.7 To prevent, oppose and combat all exploitation and abuse of persons of concern* *3.7.1 I undertake not to abuse the power and influence that I have by virtue of my position over the lives and well-being of persons of concern.* *3.7.2 I will never request any service or favour from persons of concern in return for protection or assistance.* *3.7.3 I will never engage in any exploitative relationships, emotional, financial or employment-related with persons of concern. I will act responsibly when hiring or otherwise engaging persons of concern for private services. I will report in writing on the nature and conditions of this employment to my manager.* *3.7.4 I will not engage in sexual activity with children under the age of 18. Mistaken belief in the age of the child does not constitute a defence.* *3.7.5 I will not engage in sexual exploitation or abuse of persons of concern, and I have a particular duty of care towards women and children.* *3.7.6 I will neither solicit nor engage in commercial exchange of sexual services as such relationships may undermine the credibility and the image of the Humanitarian Sector and of DRC.* *3.7.7 I am aware that DRC strongly discourages sexual relationships between its staff members and persons of concern, although these relations are not exploitative or abusive. Such relationships may undermine the credibility and the integrity of DRC and of the staff members involved. Should I find myself in such a relationship with a person of concern that I consider non-exploitative and consensual, I will report this to my manager for appropriate guidance in the knowledge that this matter will be treated with due discretion.*
Whistleblower Policy	• Not known.
Prevention	• Short films used during the onboarding of new staff, training existing staff, and to foster dialogue and awareness raising. The films can also be used to inform partners

	and other stakeholders about DRC's policies and procedures when it comes to serious misconduct. Films can be accessed here. • HR has developed new onboarding checklists for managers. • During onboarding, new staff is presented with the Code of Conduct along with their contract. The Code of Conduct is shared in writing as well as in a four-minute video which explains the basics of what standard of behaviour the Code of Conduct sets for DRC staff. • The global Code of Conduct Team conducts training in Country Operations upon need or request from management. The topic of sexual harassment, sexual exploitation and abuse is thematically included in the training as part of explaining what is considered serious sexual misconduct. Five such training courses have taken place in 2017. More is planned for 2018. • Code of Conduct training is part of the HQ induction for new management staff in the field, and is held 4 times a year. Country and regional accountability focal points, HR consultants and managers frequently provide training with the aim of raising awareness about the Code of Conduct, the rights, obligations and possibilities to report serious misconduct, and the expected standards of behaviour for DRC staff.
Survivor Support	• Not known
Complaints	• DRC has had a complaint procedure since 2009 to address serious misconduct by staff as defined in the Code of Conduct. DRC added detailed guidelines for the conduct of administrative investigations into such complaints in 2013. The investigation guidelines set standards for due process, protection of confidentiality, and burden of proof for the investigation into all serious misconduct allegations. • To report or file a complaint: Code of Conduct Reporting Mechanism or e-mail c.o.conduct@drc.dk
Investigations	• HQ investigation staff is trained specifically in the handling of investigation of such cases.
Other/Misc	• N/A

ORGANIZATION: ICRC

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• Code of Conduct (May 2018). This Code of Conduct (the "Code") applies to all ICRC employees. For the purposes of the Code, anyone who works for the ICRC under an employment contract or on another basis (such as a secondment agreement with a National Society or another employer, a consultancy contract or as a volunteer) is considered an employee. The Code contains the following sections: a) Rules of conduct; b) Harassment, abuse of power and sexual exploitation; c) Duty of discretion; and d) Use of information technology facilities. The Code also lists reporting mechanisms, who to report to and other places to seek help. • The Code of Conduct and details of how employees and people outside the ICRC can report potential misconduct or any other compliance-related matter can be found on the ICRC's website. • The Code also lists reporting mechanisms, who to report to and other places to seek help
Whistleblower Policy	• In the ICRC Code of Conduct, there is a reference to a whistleblower protection mechanism: *ICRC employees who report potential misconduct or who provide information or otherwise assist in an inquiry or investigation of potential misconduct will be protected against retaliation.*
Prevention	• In terms of vetting job applicants, ICRC puts the initial onus of disclosing misconduct information on the candidate. It requires applicants to self-declare prior issues of sexual or other misconduct and termination of past employment in the application,

	and to consent to the disclosure of any misconduct or termination information by their former employer during the verification of references. Affirmative responses or the failure to consent to the disclosure of information results in the rejection of the applicant without further consideration (*Preventing Transgressors From Moving Through The Humanitarian System, May 2018)*
Survivor Support	• Not known
Complaints	• The ICRC Code of Conduct and details of how employees and people outside the ICRC can report potential misconduct or any other compliance-related matter can be found on the ICRC's website. • Several reporting channels are available: ○ the online form on the confidential reporting platform ○ letter: ○ or to the Global Compliance Office: International Committee of the Red Cross 19 Avenue de la Paix 1202 Geneva Switzerland email: code_of_conduct@icrc.org • ICRC employees can also make a complaint in person, by letter or by phone to one of the following people: line manager; HR manager or finance & administration manager; head of delegation or regional director general counsel; any member of the Global Compliance Office based in Geneva. • ICRC's intranet page contains more information on reporting potential misconduct (not accessible to the public). • The ICRC may take disciplinary measures against employees found to have violated the Code of Conduct, including termination of employment. • Other places for ICRC employees to seek help or advice: Ombuds Office based at headquarters:ombuds@icrc.org worldwide ombuds network.
Investigations	• Not known
Other/Misc	• In spring 2017, ICRC created the Global Compliance Office, tasked with monitoring and enforcing staff adherence to the Code of Conduct. This office manages complaints and allegations confidentially and functions independently. Before that ICRC created a worldwide ombudsman network to which staff can turn for advice and support.

ORGANIZATION: IFRC

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• IFRC's Staff Code of Conduct (2007) applies to all Staff at all times during their service with the Federation– both during and after working hours. "Staff" in this Code refers to all Federation employees (Geneva-based, delegates and local staff), consultants, volunteers, and interns, as well as staff-on- loan and all individuals working under the Federation name and legal status. Federation Staff are expected to be advocates and champions of vulnerable people everywhere and to act in accordance with the Fundamental Principles and this Code of Conduct. • The IFRC Code of Conduct includes information on staff, management and institutional responsibility in the implementation of the CoC. It also sets out rules of conduct under section 3, with a specific section on SEA (points 17 – 20): ○ *17. Not commit any act of sexual exploitation, sexual abuse or sexual violence. This prohibition extends to all forms of sexual abuse or exploitation and includes not reporting concerns or suspicions regarding any violation by a co-worker (whether fellow Staff or an individual working for a partner organisation).*

	○ *18. Not engage in any sexual activity with persons (adult or child) that look to or benefit from the Federation's protection or assistance, or with any persons under the age of 18 years, regardless of the age of majority or consent locally (mistaken belief in the age of a child is not a defence). Sexual activity includes all forms of activity and abuse of a sexual nature, with or without physical contact and whether or not either party is aware of such abuse.* ○ *19. Not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition extends to any use of sex trade workers.* ○ *20. Not produce, procure, distribute or use pornographic material in Federation offices or on Federation equipment, including reading/surfing pornographic websites or message boards or sending pornographic emails.*
Whistleblower Policy	• From Whistleblower Protection Policy: ○ *2.3.1 A suspicion of alleged misconduct should be reported in writing as soon as possible and normally not later than 6 months after the whistleblower has come to learn of the specific event(s). The report should be factual and contain as much information as possible to allow for a proper assessment of the nature, extent and urgency of the matter.* ○ *2.3.2 Reports of a suspicion of alleged misconduct should be made through the established internal channels, as follows, either: directly to Human Resources in Geneva or in the field, or; to the whistleblower's line manager(s) or any Senior Manager, or to the Risk Management and Audit department, or through Safecall, a confidential service run by an independent third party, at ifrc@safecall.co.uk.* ○ *2.3.3 In all cases, the line manager or Senior Manager or the Risk Management and Audit Department shall refer the matter to the Head, Human Resources, who shall acknowledge receipt of the report of the alleged misconduct normally within three days of receipt thereof.* • From IFRC PSEA Policy (2018): ○ *Reporting by Affected Persons* ▪ *In every country where IFRC operates, an appropriate mechanism for Affected Persons to report SEA by IFRC Personnel shall be developed and information about it effectively disseminated. These may include creation of a community-based complaint mechanism in collaboration with the community, use of the IFRC whistle-blower hotline system ("currently known as Safecall") and/or designation of a focal point for receiving complaints. Reporting by IFRC Personnel IFRC* ○ *Personnel who witness, are aware of, or suspect that other IFRC Personnel have engaged in SEA shall report through any of the following current channels: a) The Office of Internal Audit and Investigations, b) The locally designated PSEA focal point (if applicable), c) The reporting individual's line manager or any other manager, including senior managers, d) Human Resources, in Geneva or the Regions, e) IFRC's whistle-blower hotline system (currently known as "Safecall").* ○ *Reporting concerning persons other than IFRC Personnel* ▪ *Complaints received against National Society staff or volunteers shall be referred to the National Society by OIAI, in consultation with Governance Support if needed. The IFRC requests National Societies to report back on the outcome of cases and on steps taken to ensure that any immediate medical, psychosocial or other needs of the SEA survivor related to the alleged incident are addressed. Complaints received against Third-Party Personnel or external*

	organisation employees shall be referred to the employer of the person concerned by OIAI.
Prevention	• Mandatory PSEA training is in place.
Survivor Support	• From IFRC PSEA Policy (2018): ○ *5.4.3 Both the alleged perpetrator, and any IFRC Personnel interviewed during the course of the investigation are to be offered appropriate support. This could include access to psychosocial support services such as counselling.* ○ *6.3.1 The IFRC requests National Societies to report back on the outcome of cases and on steps taken to ensure that any immediate medical, psychosocial or other needs of the SEA survivor related to the alleged incident are addressed.*
Complaints	• See Whistleblower Protection and PSEA Policies above
Investigations	• From IFRC PSEA Policy (2018): ○ *5.3 Responsibilities of the Office of Internal Audit and Investigation* ▪ *5.3.1 The Director of the Office of Internal Audit and Investigations (OIAI) has the authority and responsibility to ensure an appropriate investigation of possible instances of sexual exploitation and abuse within IFRC4. The assessment and/or investigation may be outsourced according to the resources and skills needed.* ▪ *5.3.2 All allegations, regardless of their communication channel should be communicated to the Director of OIAI without delay. Reports of possible sexual exploitation and abuse may be submitted anonymously and shall be kept confidential.* ▪ *5.3.3 Upon receipt of an allegation, a preliminary assessment of the allegation will be performed by OIAI. If the preliminary assessment of the allegation shows that there are legitimate grounds to believe that possible sexual exploitation and abuse has occurred, an administrative investigation shall be opened in line with the IFRC investigation procedures and applicable staff rules and regulations.* ▪ *5.3.4 Confidentiality is to be maintained in relation to OIAI's investigative activities by all parties involved. The person who is the subject of an allegation is presumed innocent during the preliminary assessment and the investigation. During an investigation the alleged perpetrator are to have an opportunity to be heard.* ▪ *5.3.5 Once the investigation is concluded, OIAI drafts an Investigation Report setting forth its findings, conclusions and recommendations.* ▪ *5.3.6 Based on the nature and severity of the allegation and the applicable legal framework, the Secretary General may decide to refer the case to the local authority and may waive immunities for the individuals concerned.* ○ *5.4 Responsibilities of the Human Resources Department* ▪ *5.4.1 OIAI shall inform the Director of Human Resources, where appropriate, of the opening of an investigation, who shall notify the IFRC Personnel whose conduct is under investigation.* ▪ *5.4.2 On the basis of the Investigation Report, the Director of Human Resources, in consultation with Legal Affairs, shall decide on (1) whether or not there are legitimate grounds to charge the individual with sexual exploitation and abuse, (2) if charges are issued, review responses to charges, (3) recommend appropriate disciplinary measures, if any, to be determined by the Secretary*

	General in line with the IFRC Staff Regulation5, and convey the final decision to the concerned individual. ▪ *5.4.3 Both the alleged perpetrator, and any IFRC Personnel interviewed during the course of the investigation are to be offered appropriate support. This could include access to psychosocial support services such as counselling.*
Other/Misc	• IFRC Child Protection Policy (2013): *The purpose of this IFRC Child Protection Policy is to provide a framework for ensuring that children are protected from all forms of abuse and exploitation in all IFRC operations, activities and programs. This document details the following aspects of the Policy: Background; Key principles of child protection; Prevention of child exploitation and abuse; Mechanisms of review of allegations; Standards for acceptable/unacceptable behaviour in relation to children; Standards expected from contractors, suppliers and partners; and Responsibilities. This Policy applies to all personnel that are engaged by the IFRC, including its staff, consultants and volunteers. It also defines, under part 7, what is expected from IFRC partners, suppliers and contractors with regard to child protection. This Policy is to be communicated to all relevant stakeholders. It is included as an annex to the global Staff Regulations and as such is part of the employment contract of all Employees. For all other personnel (defined as any individual contracted by the IFRC, whatever his/her legal status, see Annex 1 on definitions), it is also an annex to the Code of Conduct and its relevant provisions are binding for all personnel required to sign the Code of Conduct.*

ORGANIZATION: INTERNATIONAL MEDICAL CORPS (IMC)

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• IMC Code of Conduct (February 2016): ○ CoC covers a wide range of ethical standards: reporting violations; responsibilities of supervisors; bribery; dealing with government officials; compliance with donor requirements; conflict of interest; gifts and entertainment; treating each other fairly and respectfully; safety and security; SEA; alcohol and drug free work place; accurate books and records; protection and proper use of assets; trade restrictions; images, logos; and social media guidelines. ○ Copies of this Code are available on OneCorps or from the Human Resources Department at Headquarters. All staff must sign a statement acknowledging receipt of the Code of Conduct and Ethics. ○ Code of Conduct and Ethics training is in place.
Whistleblower Policy	• Whistleblowing Policy (September 2017, v3): ○ Sets out duties and responsibilities of employees, team members and Directors as well as third parties when raising concerns about possible misconduct. Outlines reporting order for both employees and team members. Outlines duties of IMC Worldwide in investigating, follow up and response. ▪ *3.5 Intentional false reporting of misconduct is prohibited and will result in termination of the IMC Worldwide employee, independent consultant or sub consultancy Agreement.* ▪ *3.6 IMC Worldwide shall provide feedback to those who raise concerns in connection with this whistleblowing policy. Such feedback shall include what steps have been taken to investigate and address the concern. Under certain circumstances, however, there may be a delay in giving feedback or a limit to what can be shared based on the advice of police and/or legal counsel.*
Prevention	• IMC has the following trainings in place for PSEA (e-mail from FP, 12/18):

	○ Code of Conduct and Ethics ○ Refresher e-learning and PowerPoint ○ PSEA e-learning ○ Induction e-learning and PowerPoint ○ Senior Manager training -- PowerPoint ○ Training of Trainers -- PowerPoint
Survivor Support	• IMC's Safeguarding Policy (2018, v2) ○ *"IMC will offer support to survivors of harm caused by employees or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor."* ○ *"We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that harmful practices are, or may be, taking place in any part of our business or in any of our supply chains."* ○ *"If you believe that you have suffered any such treatment, you should inform the Human Resource Manager immediately or appropriate Regional Director. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Intranet."*
Complaints	• IMC has a Complaints Procedures Manual. Not seen. • IMC's Safeguarding Policy (2018, v2) ○ *"Employees who have a complaint or concern relating to safeguarding should report it immediately to IMC's Safeguarding Manager – Adele.Monk@imcworldwide.com. If the employee feels more comfortable reporting to someone more familiar to them, they may report to any other appropriate employee or a local Safeguarding Focal Point. For example, this could be a Senior Manager or a Regional Director."*
Investigations	• IMC's Safeguarding Policy (2018, v2) ○ "*Employees who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure."* ○ *"We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible."* ○ *"We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that harmful practices are, or may be, taking place in any part of our business or in any of our supply chains."* ○ *"If you believe that you have suffered any such treatment, you should inform the Human Resource Manager immediately or appropriate Regional Director. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Intranet."*
Other/Misc	• IMC has the following in place for PSEA (e-mail from FP, 12/18): ○ Code of Conduct and Ethics ○ Policy Against SEA ○ Complaints Procedures Manual ○ Complaints Referral Form ○ SEA Investigations Manual ○ SEA Referral Pathway

	○ PSEA FAQs • Safeguarding Policy (July 2018, v2): ○ IMC commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response. Includes information on how to report as well as guidance on how to receive a report. ○ The policy lays out the commitments made by IMC, and informs employees and associated programme personnel of their responsibilities in relation to safeguarding. ○ This policy applies to all IMC Worldwide employees, permanent or otherwise. This policy also applies to all associated personnel whilst engaged with work or visits related to IMC, including but not limited to the following: independent consultants; contractors' employees; contractors' independent consultants; programme visitors including client representatives, journalists, celebrities and politicians. ○ This policy addresses the following areas of safeguarding: child and adult safeguarding and also protection from sexual exploitation and abuse (PSEA). ○ This policy also includes provision on protection and support for whistleblowers. ○ In terms of response, survivors will lead decisions regarding support.

ORGANIZATION: INTERNATIONAL ORGANIZATION FOR MIGRATION (IOM)

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse, IN/234, which binds staff members to standards of behavior at all times and especially when working with beneficiaries of assistance, including during emergency response. • In addition to IOM's PSEA Instruction and the Standards of Conduct, IOM has also made PSEA commitments that include inter-agency coordination to prevent and address SEA incidents, including active participation in in-country PSEA Networks.
Whistleblower Policy	• Not known
Prevention	• IOM as an institution has played a key leadership role in promoting stronger safeguards, standards, and inter-agency cooperation at the global level. • Director General (DG) Swing was the IASC Champion on PSEA from 2011-2018, working with senior leadership from IASC member agencies to implement PSEA standards and international commitments on the issue, and reporting biannually to the IASC Principals on the PSEA accomplishments and challenges of all member agencies. • Additionally, IOM has worked in close collaboration with humanitarian assistance agencies to develop tools on inter-agency complaint mechanisms and plays an active role in the Task Team on Accountability to Affected Populations and PSEA, and its technical assistance helpdesk for in-country PSEA networks. • Since 2016 and ongoing, the inter-agency PSEA capacity-building team in DOE has provided technical assistance to Humanitarian Country Teams and PSEA Networks on setting up or strengthening joint PSEA initiatives, including joint CBCMs. • From IOM's PSEA Policy IN/234 (2016): *"The Gender Coordination Unit, in coordination with the Talent Management Unit, the Office of the Inspector General, the Ethics and Conduct Office and other relevant departments, shall create an online training module on PSEA for IOM staff members to supplement existing training materials, subject to the availability of funding."*
Survivor Support	• From IOM's PSEA Policy IN/234 (2016): "*Provision of non-financial assistance: IOM will provide non-financial assistance and support to complainants and victims of SEA as deemed necessary and appropriate on a case-by-case basis. A preliminary assessment of the victim's or complainant's needs arising directly from SEA or alleged SEA should*

	be conducted as soon as possible. The assistance provided to complainants shall aim at fulfilling needs that cannot await the substantiation of a claim. The nature and duration of assistance may vary. This assistance may include immediately needed services (e.g. medical care, psychological counselling, legal advice, provision of shelter, food, clothing and security). Assistance provided to victims is not intended to serve as compensation and shall not be considered, in part or whole, as compensation for damages or injury caused by SEA. If assistance is deemed necessary and appropriate, IOM will rely on existing local services, such as those already available to the victims of sexual and gender-based violence."
Complaints	• IOM's MigApp is a user-friendly downloadable application that was released worldwide in December 2017. This application can be used by beneficiary populations and staff members, and contains a reporting link that goes directly to the Ethics and Conduct Office. • From IOM's Policy IN/234 (2016): *"For the purposes of the present Instruction, a "complainant" is a person who files a complaint alleging that he or she is a victim of SEA. A person's status as a complainant starts as soon as a complaint is filed and lasts until a decision has been reached by IOM based on the facts that substantiate SEA, at which point a person attains victim status."* • From IOM's Policy IN/234 (2016): *For IOM staff members: reporting SEA or retaliation related to SEA 21. All IOM staff members shall report in good faith SEA allegations, concerns or suspicions or retaliation related to SEA, as described in paragraph 13(b) above, to one of the following: (a) Their immediate supervisor, who shall act in accordance with paragraph 22 of the present Instruction; or (b) The PSEA focal point, as defined in paragraph 12(a) above, who shall act in accordance with paragraph 23 of the present Instruction; or (c) The Ethics and Conduct Office at Ethics&ConductOffice@iom.int or PSEA@iom.int if the IOM staff member knows or suspects that his or her immediate supervisor and/or the PSEA focal point is directly or indirectly involved in the matter.* • *All supervisors who receive from their supervisees reports about SEA allegations, concerns or suspicions or retaliation related to SEA shall promptly report to one of the following: (a) The PSEA focal point, as defined in paragraph 12(a) above, who shall act in accordance with paragraph 23 of the present Instruction; or (b) The Ethics and Conduct Office at Ethics&ConductOffice@iom.int or PSEA@iom.int by submitting a duly completed Confidential report of SEA or retaliation related to SEA (Annex 3), if the supervisor knows or suspects that the PSEA focal point is directly or indirectly involved in the matter.* • *PSEA focal points who receive any report or complaint of SEA allegations, concerns or suspicions or retaliation related to SEA from any source, including from the local referral complaint mechanism, shall promptly submit a duly completed Confidential report of SEA or retaliation related to SEA (Annex 3) to the Ethics and Conduct Office at Ethics&ConductOffice@iom.int or PSEA@iom.int.* • *For non-IOM staff members: allegations, concerns or suspicions of SEA or filing SEA complaints. A local complaint referral mechanism shall be introduced in locations where IOM operates, for non-IOM staff members (e.g. beneficiaries and those people not included in paragraph 4 above) to report or complain about SEA or about retaliation related to SEA. Such a mechanism shall be reasonably accessible to non-IOM staff members (including IOM beneficiaries and the most vulnerable populations) in locations where IOM operates. IOM offices are urged to participate in jointly developed community-based complaint mechanisms, where appropriate. PSEA focal points are responsible for creating, maintaining and raising awareness about the local complaint referral mechanisms for non-IOM staff members.*
Investigations	• IOM Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse (IN/234): *Response to a complaint or report of SEA - Upon receipt of a report or complaint about SEA allegations, concerns or suspicions or retaliation related to SEA,*

	IOM shall: (a) Take all reasonable actions to protect the alleged victim, alleged offender, complainant, reporter and any witnesses from any retaliation; (b) Conduct any initial assessment and investigation, if deemed necessary, promptly and objectively in a neutral and confidential manner with full respect for the principles of due process, in accordance with IOM standards, policies and procedures, including the Charter of the Office of the Inspector General (IN/74/Rev.1) and the IOM Data Protection Principles (IN/138); (c) Take appropriate measures to ensure effective cooperation in the Field between the Organization and United Nations entities and non-governmental organizations on issues involving SEA; (d) Take the above action regardless of the function, title, length of service or contractual status of the person(s) concerned. • *IOM may: (a) Take disciplinary action against the offender in accordance with Staff Regulation 10 or terminate the contract of the offender if he or she is not subject to the Unified Staff Regulations; (b) Take managerial action, including mandatory training, counselling, revision of standard operating procedures or other appropriate corrective measures; (c) Close the case if there is no or insufficient evidence of SEA; or (d) Take any other action as deemed appropriate. IOM ensures due process during all proceedings, including the right of the alleged offender to be informed of the allegations against him or her, to be given the opportunity to respond to those allegations and to request review of or appeal any decision taken against him or her according to standard IOM procedures. Investigations form part of the internal oversight mechanism provided by the Office of the Inspector General and are undertaken under its authority. In composing the investigation teams, due regard is given, to the extent possible, to gender, geographical and other relevant considerations. The Administration may also decide, if deemed necessary and upon internal consultation with, among others, the Office of the Director General and the Office of Legal Affairs, to refer any complaints about SEA allegations, concerns or suspicions to the national authorities for appropriate action. Complaints, concerns or suspicions about SEA committed by a person who is not an IOM staff member may also be referred to local law enforcement authorities and/or reported to the employer of such person.*
Other/Misc	• IOM Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse (IN/234 has a specific section on Budget: *"The Office of the Director General, in coordination with the Gender Coordination Unit and the Department of Resources Management, shall meet the financial and human resources needs arising from the implementation of the present Instruction, including victim assistance and training, to be included in donor appeals and the annual organizational programme and budget, recognizing that budget requirements may change over the course of this policy's implementation."*

ORGANIZATION: INTERNATIONAL RESCUE COMMITTEE (IRC)

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• IRC's Code of Conduct also known as the IRC Way is a comprehensive document that outlines ethical and moral standards as well as practical steps that one can take to follow the Code of Conduct, and examples of concerns that should be escalated for proper response. • The IRC Way endorses the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, and is guided by its core humanitarian principles, including humanity, impartiality, neutrality and independence. • The IRC Way applies to all IRC directors, officers, employees, interns, volunteers, incentive staff and partners who work on behalf of the IRC.

	• The IRC Way includes sections on commitments to different stakeholders, including colleagues, clients, donors, suppliers, partners, and to IRC. The IRC Way also describes resources available in the form of relevant IRC policies and guidance on each of these commitments. Further information on how to spot ethical dilemmas and channels for raising concerns are included in this document.
Whistleblower Policy	• The IRC Way/Code of Conduct outlines IRC's Anti-Retaliation Policy (n.d.): ○ *"The IRC will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated. Anyone, regardless of position or tenure, found to have engaged in retaliatory conduct against someone who has raised an ethics or compliance concern will be subject to disciplinary action, and possibly termination. If you feel you have been subjected to retaliation, you should contact the Hotline for assistance."* ○ *"The IRC encourages managers and employees to self-report violations and, depending on the specific circumstances, may treat self-reporting as a mitigating factor when assessing any disciplinary measures."*
Prevention	• Not known.
Survivor Support	• Not known. IRC is in process of improving its survivor-centred guidance linked to PSEA.
Complaints	▪ The IRC Way/Code of Conduct lists several channels of communication for staff seeking advice or wishing to report concerns on a wide range of areas. ▪ The Ethics and Compliance Unit is responsible for responding to concerns/complaints that reflect a potential violation of IRC's Code of Conduct. The Ethics and Compliance Hotline is administered by EthicsPoint, which is an independent third party that does no log or identify telephone numbers or computer IP addresses. It is available 24 hours a day, 7 days a week, in multiple languages. It is available to anyone involved with the IRC, including staff, clients, suppliers or partners. While individuals are encouraged to provide their name when raising a concern and to help IRC ensure that the complainants do not experience retaliation when making a good faith report, IRC recognises that individuals may wish to raise concerns anonymously but cautions against using the Hotline in bad faith as this will undermine the integrity of the Hotline for everybody.
Investigations	• Not known
Other/Misc	• IRC also has the following policies, relevant to SEA, in place: Beneficiary Protection from Exploitation and Abuse Policy; Child Safeguarding Policy; Combatting Trafficking in Persons Policy; Confidentiality Policy; Open Information Policy.

ORGANIZATION: NORWEGIAN REFUGEE COUNCIL (NRC)

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• Code of Conduct (July 2008). ○ This Code of Conduct applies to all staff; international and national staff, trainees, volunteers, HQ staff and anyone representing NRC. Whether signed or not, the Code shall automatically form an integral part of all NRC's contracts of employment and conditions of service for all staff. ○ Specific section on PSEA with a list of prohibited behaviors ▪ *Sexual exploitation and sexual abuse violate universally recognised international human rights standards, are a criminal offence in many countries and have always been unacceptable behaviour for NRC personnel.* ▪ *Sexual relationships between NRC personnel and beneficiaries of assistance undermine the credibility and integrity of the work of NRC and are prohibited.*

	▪ *Where an NRC staff member develops serious concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he/she must report such concerns via his/her supervisor and/or established reporting mechanisms.* ▪ *NRC staff members and management are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promote the implementation of the Code of Conduct.* ▪ *Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.* ▪ *The term 'sexual exploitation' is here defined as any abuse of a position of vulnerability, differential power, or trust for sexual purposes; including profiting monetarily, socially or politically from the sexual exploitation of another.* ▪ *Similarly, the term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.* ▪ *In order to protect the most vulnerable populations in humanitarian crises, especially women and children, staff must declare and accept the following:* • *I will not commit any act of sexual exploitation, sexual abuse or sexual violence.* • *I will not engage in any sexual activity with persons (adult or child) that benefit or look to benefit from NRC's protection or assistance, or with any persons under the age of 18 years10, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defence.* • *I will not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition extends to any use of sex trade workers.* • *I will not produce, procure, distribute or use pornographic material in NRC's offices or on NRC's equipment, including reading/surfing pornographic websites or message boards or sending pornographic emails .* ▪ *The above-mentioned standards are not intended to be an exhaustive list. Other types of sexually exploitative or abusive behaviour may be grounds for disciplinary measures.*
Whistleblower Policy	• Not known
Prevention	• Not known
Survivor Support	• Not known
Complaints	• Not known
Investigations	• Not known
Other/Misc	• Anti-Corruption Policy (n.d.) outlines NRC's position on Anti-Corruption, defines corruption as *"the abuse of power for illegitimate individual or group benefits. This involves both financial and non-financial benefits."* ○ Policy outlines duty to report misconduct through three whistleblowing channels: ▪ 1. Through Line Manager or any senior NRC manager; ▪ 2. Through-appointed focal points or staff representatives; ▪ 3. Through the HR Manager/adviser in the country office, regional office or HR adviser in HO. Policy includes references to

	NRC's Anti-Corruption Handbook (must-read resource for line managers and support staff). ○ Policy lists documents that include regulations and procedures related to Anti-Corruption. An Anti-Corruption and Investigation Adviser position established at the Head Office is the global focal point for ○ NRC's anti-corruption work and investigation of (alleged) cases of corruption. The Anti-Corruption and Investigation Adviser must be informed as early as possible about all probable corruption cases within the organisation and will coordinate information given to our donors.

ORGANIZATION: OCHA

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• UN Staff Rules and Regulations (agency-specific CoC not known)
Whistleblower Policy	• Not known
Prevention	• In line with the Secretary-General's Bulletin (ST/SGB/2003/13), OCHA has established structures and procedures for ensuring compliance with the zero-tolerance policy. • Standard operating procedures are in place for submission and receipt of complaints, reporting, investigation and victim assistance. • PSEA focal points have been established in OCHA offices at headquarters, regional and country levels, and all staff members receive training and information on preventing and responding to acts of sexual exploitation and abuse. • At the field level, Humanitarian Coordinators (HCs) are charged with ensuring that effective systems are in place for preventing and responding to acts of sexual exploitation and abuse, and OCHA provides support to HCs to this end. • HCs' responsibilities on PSEA are included in their annual compacts, and HCs report regularly to the Emergency Relief Coordinator (ERC) on the matter. The topic is also a standing item in the HCs' annual retreat. • As the Chair of the Inter-Agency Standing Committee (IASC), the ERC plays a key role in propelling progress on PSEA across the humanitarian system.
Survivor Support	• Standard operating procedures are in place for victim assistance. Details not known.
Complaints	• Standard operating procedures are in place for submission and receipt of complaints. Details not known.
Investigations	• Standard operating procedures are in place for investigations. Details not known.
Other/Misc	• OCHA supports the IASC Champion on PSEA and Sexual Harassment in implementing priority actions through the network of IASC Senior Focal Points on PSEA. They meet bi-annually to assess individual organizations' progress in combatting sexual exploitation and abuse. Priority actions include establishment of safe and accessible community-based reports mechanisms, ensuring that survivors have access to assistance, and field-based PSEA networks wherever humanitarian assistance is delivered.

ORGANIZATION: SAVE THE CHILDREN

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• Multiple CoCs (region/affiliate specific) in place across the organisation
Whistleblower Policy	• Save the Children UK Whistleblowing Policy ○ The Whistleblowing Policy sets out processes and advice for escalating concerns internally to named persons, to the Integrity Line which is a confidential third party service, and to external regulators (the Charity

	Commission and the Fundraising Regulator, although no reference is made to the Health and Safety Executive). ○ The policy describes the Integrity Line as an avenue by which reports may be made anonymously, about any matter, but advises that it is more difficult for the charity to take action in response to anonymous reports. Reports to the Integrity Line will be forwarded to the charity and dealt with in accordance with the policy. The current arrangement is that reports are forwarded to the Director of Child Safeguarding
Prevention	• Mandatory CoC training; as of June 2018, there is 95% compliance.
Survivor Support	• Not known.
Complaints	▪ Save the Children UK PSEA Policy (May 2018) *The following information has been extracted from the Independent Review of Workplace Culture at Save the Children UK. The full report can be found here.* ○ *"The policy makes it a duty for all members of staff and other 'representatives' defined in the policy to report concerns regarding potential sexual exploitation and abuse. For the charity's staff, disciplinary action may follow breach of the policy. Others within the scope of the policy may be referred to statutory agencies."* ○ *"Concerns are to be internally reported to a 'PSEA Focal Point' who is not named or identified by their position. A dedicated email link is provided for contacting them. However, no information is given about what will happen next; or when the person reporting the concern should expect to receive a response, such that they can be confident they have fully discharged their duty."*
Investigations	• Not known.
Other/Misc	• Child Safeguarding Policy (SC UK, April 2018) ○ Policy applies to all staff, representatives and partners ○ 'Children First' card – all staff and representatives must act in accordance with this card, a code of behavior that ensures the welfare and safety of children is prioritized at all times. ○ All staff must sign the Child Safeguarding Declaration of Acceptance, prior to or at the time of signing of a contract for employment or other services. ○ Outlines responsibilities of different entities, mandatory training, reporting procedures and partnership agreements. • Exploitation or abuse of adult beneficiaries by any SC UK member of staff or representative is unacceptable and should be addressed under the PSEA Policy. • Save the Children UK PSEA Policy (May 2018) ○ This policy was adopted in May 2018 and a training module is currently in development. The policy addresses actual and suspected acts of sexual exploitation and abuse of adults by Save the Children UK staff or the charity's 'representatives'. ○ The term 'representatives' is defined in the policy, and includes people working for or with the charity, contractors, suppliers, volunteers and visitors to the charity's premises. The acts it contemplates include sexual exploitation and abuse of adults in the communities with which the charity works, and also the charity's own staff. • The Save the Children UK PSEA Policy (May 2018) intersects with several other people management policies. The document should be read in conjunction with the Child Safeguarding Policy, the Save the Children Code of Conduct, the Grievance Policy, the Gender Equality Policy and the Whistleblowing Policy.

ORGANIZATION: TRANSLATORS WITHOUT BORDERS (TWB)

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• Code of Conduct (n.d.). ○ TWB's CoC details TWB's expectations of employees in a number of important situations. All employees, interns, volunteers and consultants (referred to as "staff" in this document) are subject to these policies. ○ Prohibited behaviors specific to SEA: ▪ *I will, in our programs, promote the well-being and development of children and will not engage in behaviour that is likely to cause harm, including physical, sexual, emotional abuse and neglect;* ▪ *I will not abuse my position for personal gain by requesting, soliciting or accepting any payment, gift, service or favour (including sexual favours) from others, whether for my own personal benefit or for another person, in return for TWB support, goods or services;* ▪ *I will not enter into commercial sexual transactions at any time while working for TWB;* ▪ *I am aware that sexual relationships between a TWB staff member and a beneficiary are likely to be based on inherently unequal power dynamics and may undermine the credibility of the organization and its work.* ▪ *I know that TWB considers such sexual relationships inappropriate. Should I be in or develop a sexual relationship with a beneficiary, I will inform immediately a senior manager in my program area of the relationship in order to clarify what could otherwise become an ambiguous situation;* ▪ *Sexual activity with children (persons under the age of 18) is expressly prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of the child is not a defense;* ▪ *The exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior with children is prohibited. This includes exchange of assistance that is due to children benefiting from TWB programing.* • TWB's CoC (similar to ActionAid's CoC) also requires all staff to report any breaches of the CoC to management. • TWB is a signatory to a voluntary CoC established by the ICRC and NGOs in Disaster Relief in 1994. This CoC outlines ten points of principle, which all humanitarian actors should adhere to in their disaster response work. These ten principles are appended to TWB's CoC.
Whistleblower Policy	• Anti-Fraud & Whistleblowing Policy (2016). ○ *"The purpose of this policy is to provide: A clear definition of what we mean by "fraud"; A definitive statement to staff forbidding fraudulent activity in all its forms; A summary to staff of their responsibilities for identifying exposures to fraudulent activities, for establishing controls and procedures for preventing such fraudulent activity and/or detecting such fraudulent activity when it occurs; Guidance to staff as to action, which should be taken where they suspect any fraudulent activity; Clear guidance as to responsibilities for conducting investigations into fraud related activities; Protection to staff in circumstances where they may be at risk of victimization as a consequence of reporting, or being a witness to, fraudulent activities. This also includes any 'whistle-blowers'."*

Prevention	• Not known
Survivor Support	• Not known
Complaints	• Not known
Investigations	• Not known
Other/Misc	• Child Protection Policy (June 2016). ○ *"This Child Safeguarding Policy is in addition (and complementary) to the general Code of Conduct. It specifies the professional behavior and good practice expected by TWB from all staff and representatives in relation to children. The Code of Conduct also identifies behavior which is unacceptable in relation to children."* ○ *"By following this policy, staff and representatives will be both playing their part in safeguarding children, and developing best practice in working with children."* ○ *"As with the general Code of Conduct, if a staff member breaks this policy or fails to meet the standard of behavior that it requires, disciplinary action may be taken."* ○ *"All TWB staff and representatives must sign the Declaration of Acceptance, prior to or at the time of issuing of any employment contract, to show that they are aware of this policy, the Child Safeguarding Joint Statement and their Summary Local Procedures and will act in accordance with these documents."* ○ *"All agreements between a) TWB and b) implementing partners other individuals, groups or organizations who have a formal/contractual relationship to TWB that involves them having contact with children must include agreement on the issue of this Child Safeguarding Policy."* ○ *"Partner agencies must adopt this policy or have developed their own policy of a similar standard. Partnership agreements must clearly outline agreed procedures for reporting and investigating concerns involving breaches of the policy involving issues of child abuse and exploitation".*

ORGANIZATION: UNDP

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• UNDP Code of Ethics (updated in 2017) Code of Ethics identifies the ethical standards expected of all who work for UNDP. • While this Code describes the ethical behavior UNDP anticipates from its staff, it states that it does not replace or supersede the various policies, rules, regulations (e.g., UN Staff Regulations and Rules), documents, web pages, bulletins and procedures that provide greater detail on specific subjects, most of which have been linked throughout the Code for clarity and ease of reference.
Whistleblower Policy	• Not known
Prevention	• UNDP's recruitment policy states clearly that staff members who have been found to have violated human rights or sexual exploitation and abuse provisions shall not be employed by the organization. • UNDP is participating in a joint project with other UN agencies to create a system-wide database to ensure that former staff members involved in substantiated cases of sexual exploitation and abuse with one entity in the system cannot be employed by another entity in the UN system. • The Secretary General's Bulletin (ST/SGB/2003/13) is part of UNDP's Individual Contracts and Service Contracts. All individual contractors and service contract holders must formally confirm that they understand what is outlined in this bulletin.

	• These provisions are also reflected in the UN Staff Regulations and Rules and staff must acknowledge these obligations before commencing a new role. • Partners of UNDP must comply with the "United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners". • UNDP has developed an on-line training course on preventing sexual exploitation and abuse, in collaboration with UNFPA, UN Women and UNHCR. • Clear information outlining the "No Excuses" approach of UN rules and prohibitions related to sexual exploitation and abuse are available to all UNDP personnel on the Conduct and Discipline site, available in English, French, Spanish, Arabic, Russian and Chinese.
Survivor Support	• Not known
Complaints	• All reports of sexual exploitation and abuse must be reported to the Office of Audit and Investigations either through an online referral form, hotline (worldwide and interpreters available 24 hours/day), by e-mail, or by regular mail to Deputy Director (Investigations).
Investigations	• Any allegation of sexual exploitation and abuse reported to UNDP is assessed and may be investigated by the independent Office of Audit and Investigation. • Depending on the violation, these cases may also, upon consultation with the Office of Legal Affairs, be referred to national authorities for criminal prosecution. • The UNDP Administrator publishes annually the details of allegations of misconduct, including cases of sexual exploitation and abuse, and sanctions taken.
Other/Misc	• N/A

ORGANIZATION: UNFPA

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• UN Staff Rules and Regulations (agency-specific Code of Conduct not known)
Whistleblower Policy	• Protection against Retaliation for Reporting Misconduct or for Cooperating with an Authorized Fact-finding Activity (issued 15 February 2008, revised 25 November 2014)
Prevention	• UNFPA conducts rigorous pre-employment checks of staff and personnel to prevent the rehiring of known offenders. • All UNFPA personnel are required to undergo mandatory online training on the prevention of sexual exploitation and abuse and sexual harassment. • Mandatory PSEA online training course developed together with UNHCR, UNDP, UNFPA and UN Women, rolled out in August 2017. • UNFPA does not partner with entities that fail to appropriately address sexual exploitation and abuse and sexual harassment.
Survivor Support	• UNFPA staff members are protected from retaliation for reporting allegations of sexual exploitation and abuse or sexual harassment in good faith. Retaliation is prohibited and, if established, constitutes sanctionable misconduct. • In collaboration with its partners, UNFPA can offer psychosocial assistance and medical treatment. • Staff members who believe that they have been victims of retaliation may seek informal redress or make a formal complaint to the Ethics Office at ethicsoffice@unfpa.org.
Complaints	• UNFPA personnel are obligated to report allegations of sexual exploitation and abuse to the Office of Audit and Investigation Services through the confidential reporting tools available here, including an online reporting form available in five of the official UN languages. • SEA allegations must be reported to the Director of OAIS either through confidential helpline, dedicated hotline e-mail, in-person at OAIS office, by e-mail, fax, letter or dedicated OAIS voicemail.

	• Anonymous reporting is possible.
Investigations	• UNFPA publishes annually, in anonymized form, details of all investigations of wrongdoing, including those of sexual exploitation and abuse and of sexual harassment, as well as sanctions taken in response. • PSEA investigation structure not known.
Other/Misc	• UNFPA adheres to the Secretary-General Bulletin on sexual exploitation and abuse, applicable to all UN staff. • The UNFPA Oversight Policy embodies the principle of zero tolerance for wrongdoing, including sexual exploitation and abuse and sexual harassment. • Prohibition of sexual exploitation and abuse and sexual harassment also forms part of UNFPA's cooperative arrangements with individual contractors, service contract holders and implementing partners. • UNPFA reports, on a real-time basis, all allegations of sexual exploitation and abuse to the Secretary-General.

ORGANIZATION: UNICEF

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• UN Staff Rules and Regulations (agency-specific CoC not known)
Whistleblower Policy	• UNICEF Policy on Whistle-Blower Protection Against Retaliation (DHR/POLICY/2018-001) covers UNICEF personnel, includes designated focal point on SEA as one of four channels for reporting misconduct or preventing retaliation, and reinforces the Ethics Office as location to report attempts at retaliation. Potential measures to protect complainants (UNICEF Personnel) and sanction retaliation attempts are set out.
Prevention	• Mandatory PSEA online training course developed together with UNHCR, UNDP, UNFPA and UN Women, rolled out in August 2017. • Field Results Group issues SEA tools and training package (2018) based on UN uniform protocol. Within UNICEF, the Field Results Group has been charged with rolling out the UN Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners. • UNICEF is increasing hands-on support for capacity building at the operational level through capacity development and support to partners to implement PSEA requirements in the revised Programme Cooperation Agreement (PCA). • UNICEF has also developed SEA risk assessment tools for its programmes and partners. • UNICEF will also establish a dedicated senior-level PSEA Coordinator who sits in the Office of Executive Director.
Survivor Support	• UNICEF allocated human and financial resources to provide and monitor assistance to SEA victims in priority countries of West and Central Africa Region and East and South Africa Region. • A UN system-wide Protocol on Victim Assistance, led by UNICEF is still in draft form. It has been field tested in CAR, DRC, Iraq and Mali.
Complaints	• UNICEF has instituted a Notification Alert to Senior Management for reporting allegations and incidents of SEA of children by UN personnel or foreign military personnel associated with a UN mandate. This is in the form of a Significant Incident Report (SIR) from the Country Representative of UNICEF to the Regional Director and onto the DED Management in New York, all within 36 hours. • UNICEF participated in the development of a UN Incident Reporting Form (IRF), and is engaged in piloting it in Democratic Republic of Congo, as part of the effort to strengthen a common approach to reporting allegations of SEA.

	• UNICEF is adapting the cellphone-based "U Report", currently in use in 40 countries, to ensure safe and accessible reporting for vulnerable communities as well to reach child victims. • Under the Child Safeguarding Policy (2016), reports required under this Policy are to be made to the Director, Office of Internal Audit and Investigations as soon as possible. *"They can be made in any of the following ways: (a) to the Head of the relevant UNICEF Office or to one's supervisor at UNICEF, who must then refer the matter to the Director, Office of Internal Audit and Investigations, New York Headquarters; (b) directly to the Director, Office of Internal Audit and Investigations, New York Headquarters; and (c) by email to integrity1@unicef.org (which is monitored by the Office of Internal Audit and Investigations). Reports must be as thorough and specific as possible. Reports must be made in good faith. Making a false or malicious allegation is not permitted or protected, and may result in disciplinary action (in the case of staff), or termination of contract for cause (in all other cases). Reports can be made anonymously, although anonymous reports that lack specific details will be reviewed but may not be pursued further if the report does not include sufficient supporting information."*
Investigations	• The Office of Internal Audit and Investigation (OIAI) carry out investigations into SEA and the training of investigators.
Other/Misc	• UNICEF Child Safeguarding Policy (2016) has 30 reference documents, instructions, guidance, and standards supporting its commitments. Senior management is required to make a case-by-case determination, taking into account all relevant factors including the best interests of the child, as to whether particular conduct comes within the scope of conduct prohibited by this Policy. The policy outlines types of prohibited conduct, the responsibilities of parties in cooperative agreements with UNICEF, i.e. host governments, civil society partners and UNICEF National Committees; and outlines processes for reporting and ways to lodge a complaint as well as issues of confidentiality and disclosure. • 16 high-priority countries and 3 regional offices have designated PSEA focal points that are responsible for supporting UNICEF's work on PSEA. • Within UNICEF, the Field Results Group has been charged with rolling out the UN Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners. • Findings from an independent review of the UNICEF response to PSEA were published in October 2018. • The "Short Guide for Managers on Prevention of, and Response to, Sexual Harassment in the Workplace and Sexual Exploitation and Abuse (SEA) of the Local Population (April 2018)" has been produced by the High-Level Committee on Management Working Technical Group on Sexual Harassment, a committee of the United Nations Chief Executives Board, which includes UNICEF. This guide provides a comprehensive checklist to assist managers in effectively fulfilling important obligations related to PSEA. The checklist outlines key steps that need to be undertaken at 6 different stages: 1. Starting a new assignment; 2. During the assignment; 3. When you witness SH in the workplace; 4. When a staff member approaches you/reports SH in the workplace; 5. Restoring the workplace environment after harassment has occurred; 6. When finishing the assignment • In 2018, a dedicated child safeguarding function and unit was added to the Office of the Executive Director

ORGANIZATION: UN WOMEN

DOCUMENTS/POLICIES	DESCRIPTION
Code of Conduct	• UN Staff Rules and Regulations (agency-specific CoC not known)

Whistleblower Policy	• UN Women Policy for Protection against Retaliation (n.d.) Based on the UN Women Guide on SEA and SH (June 2018), the Retaliation policy is described below: *Retaliation against an individual because that person has reported allegations of wrongdoing on the part of one or more staff member(s), or cooperated with a duly authorized audit or investigation, constitutes MISCONDUCT, which if established, will lead to DISCIPLINARY ACTION and/or transfer to other functions in the same or a different office. In order to be protected by the Retaliation policy, the allegations of wrongdoings reported by an individual must have a reasonable basis of belief and should not be intentionally false or misleading, or they could constitute misconduct for which disciplinary measures may be imposed. Managers and supervisors must ensure that all personnel who report an instance of SH or SEA are protected from retaliation.* Option 1: UN Women encourages the informal resolution of conflicts. To seek resolution of the matter, UN Women personnel may, at their discretion:
	  ○ Contact the Office of the Joint Ombudsman.
	  ○ Request a third person to mediate.
	• Option 2: UN Women personnel may submit a formal complaint to the Director of the UN Ethics Office (no later than 60 days after the alleged act or threat of retaliation). If the Ethics Office determines there is a prima facie case of retaliation or threat of retaliation, it will refer the case to the Director OIOS who will seek to complete its investigation and submit its report to the Ethics Office within 120 days.
	• Note that enquiries to the Ethics Office are confidential.

Prevention	• Mandatory PSEA online training course developed together with UNHCR, UNDP, UNFPA and UN Women, rolled out in August 2017.
Survivor Support	• Not known
Complaints	• The formal channel for reporting allegations of SEA and SHA is the Office of Internal Oversight (OIOS). For confidentiality purposes, allegations of SEA should ONLY be reported to OIOS. The Investigations Division of OIOS will assess and determine whether to investigate allegations of SEA by UN Women personnel or by third parties acting on behalf of UN Women. OIOS will acknowledge the receipt of all allegations. • The Director of the Investigations Division will decide whether to investigate, refer, or file a report for information, or whether to suspend it for preliminary inquiries. • Anyone can report SEA allegations and reports can be made anonymously. • The Office of Internal Oversight Services (OIOS) has established a reporting facility to provide a confidential mechanism for individuals wishing to report allegations of SEA. Any individual can report directly to OIOS in the following way: investigations hotline, online reporting form and regular mail.
Investigations	• The Office of Internal Oversight Services (OIOS) of the United Nations has been entrusted with the responsibility of providing investigation services to UN Women. In the event of an investigation, OIOS Investigations Division staff will carry out an administrative fact-finding process involving, for example, interviews with witnesses, documentary analysis and forensics. • If the facts are established, OIOS is responsible for submitting an investigation report with appropriate recommendations to UN Women, for consideration of disciplinary proceedings or administrative action, as appropriate.
Other/Misc	• UN Women Guide on SEA and SH (June 2018) provides UN Women Managers and Personnel with a comprehensive overview of the policies and procedures applicable to Sexual Exploitation and Abuse as well as Sexual Harassment. This Guide is not intended to replace or be a substitute for UN Women's policies and

	procedures and all personnel are expected to familiarize themselves with these policies. Its aim is to raise awareness about the policy framework for identifying, addressing, reporting and preventing sexual misconduct within our organization.
	• *UN–Women Legal Framework for Addressing Non–compliance with UN Standards of Conduct (January 2018)* The present document does not apply to: (a) UN–Women staff members on an inter–organization exchange to a UN agency for acts that occurred during their inter–organization exchange to that agency. However, disciplinary action under the present document may be initiated upon their return; (b) individuals who do not have a UN Women letter of appointment; (c) independent contractors working with UN–Women under Special Service Agreements (SSA); (d) persons employed under Service Contracts (SC);(e) UNV Volunteers (UNVs);(f) interns. The present document serves multiple purposes: (a) It serves as a reminder to all staff members of their duty to abide by the highest standards of conduct. It defines the mechanisms that currently exist within UN–Women for reporting allegations of wrongdoing, as well as what constitutes misconduct (Chapter I); (b) It clarifies the responsibilities of each individual involved in the investigation of allegations of wrongdoing (Chapter II); (c) It explains the procedure following investigation (Chapter III); (d) It outlines the disciplinary procedure (Chapter IV)
	• UN Women PSEA Action Plan for 2018 is organized across 4 pillars with specific indicators and actions in support of each area.
	  ○ Management and coordination (HR/Regional Directors/Heads of Field Offices/HQ Sections/Legal Division/Programme Division)
	  ○ Engagement with and support of local communities (Heads of Field Offices/PSEA Focal Points/Field Offices)
	  ○ Prevention (HR/ERM/Legal)
	  ○ Response (HR/ The Executive Director's Office/OIOS)

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