

SUMMARY OF IASC GOOD PRACTICES

Preventing Sexual Exploitation and Abuse and Sexual Harassment and Abuse of Aid Workers

31 May 2018

This paper summarizes actions undertaken by IASC organizations to prevent, investigate, and respond to sexual exploitation and abuse (SEA) and sexual harassment and abuse (SHA)¹. It aims to promote good practice and learning within the IASC and identify opportunities for collaboration, where possible, responding among others to external calls for the IASC to “share and promote best practices on preventing, investigating, and responding to sexual harassment and assault.”² The actions have been grouped according to the six questions discussed at the 15 March 2018 IASC Principals meeting. The intention is to periodically update this document with new good practices. Only a snapshot of the extensive inputs submitted by IASC organizations is provided below; with the agreement of IASC Principals, the full record can be made available on the IASC website.

1. Whether we all have clear and appropriate standards, rules and expectations governing PSEA and sexual harassment, and how far they are consistent across the sector.

Setting consistent expectations through policy is a key element of improving behaviour. In 2002 the IASC adopted six core principles intended to set forth standards to prevent SEA. Translators Without Borders is currently supporting the IASC AAP/PSEA Task Team to translate these principles into 100 languages to make the principles more accessible worldwide.

These principles were incorporated into the UN Secretary General’s Bulletin on special measures for protection from sexual exploitation and sexual abuse (2003). The Bulletin states that “sexual exploitation and sexual abuse violate universally recognized international legal norms and standards and have always been unacceptable behaviour and prohibited conduct for United Nations staff.” It obliges UN staff to report incidents of abuse, and is binding on all UN staff, including all agencies and individuals who have cooperative agreements with the UN. UN organizations apply the 2003 bulletin and in some cases have used it as a foundation for the development of agency-specific policies. There are two other UN SG Bulletins – one on the prohibition of discrimination, harassment, including sexual harassment, and abuse of authority (2008), and another on protection against retaliation for reporting misconduct and for cooperating with duly authorized audits or investigations (2017) - define and prohibit all such behaviour and put in place measures to combat whistleblower retaliation. These Bulletins are useful references for IASC organizations as they provide clarity on definitions on SEA and SHA (e.g. Oxfam uses UN definitions for PSEA and sexual harassment).

UN agencies reported steps to further clarify policy set out in the 2003 Bulletin by establishing additional, internal guidance or standards or rolling out complementary guides or visualizations. For example, OHCHR developed the *Dignity@Work* policy which explicitly states that OHCHR has a policy of zero tolerance for abuse of authority, discrimination and

¹ The collection of good practices built on the work led by the IASC Co-Champions on SHA, Kate Gilmore and Lindsay Coates, in 2017.

² Feinstein International Center, Stop the Sexual Assault against Humanitarian and Development Workers, p. 5. Available at: <http://fic.tufts.edu/publication-item/stop-the-sexual-assault-against-humanitarian-and-development-aid-workers/>

harassment, including sexual harassment. *Dignity@Work* also recognizes OHCHR's duty of care to staff by setting preventive and corrective measures and requiring the collection of information on the prevalence and incidence of prohibited conduct within OHCHR. WFP's revised Policy now allows complaints from former WFP employees and from witnesses of abusive conduct.

In addition to frameworks in place for personnel, UNHCR and UNICEF also set standards/requirements in partnership agreements for (implementing) partners on managing misconduct and SEA prevention responsibilities; UNICEF's PSEA standards have also been incorporated into its supply policies.

WFP has shared with its employees a Guidance Note about the Prohibition on Engaging Prostitution Services to help employees understand WFP's expectations of conduct as related to prostitution. UNHCR has prepared a number of brochures for staff on addressing grievances, protection against retaliation and reporting SEA.

Many UN IASC organizations have specific Codes of Conduct that are relevant to SEA and SHA. IOM's Standards of Conduct enshrines "Freedom from harassment" as one of IOM's core values.

Making information available in **multiple languages** is critical to ensuring staff and affected people understand the key concepts of preventing sexual exploitation and abuse. To this end, IFRC translated its anti-harassment guidelines into English, Arabic, French and Spanish. UNHCR's Code of Conduct has been translated into nine languages³ and its brochure for staff on reporting sexual exploitation and abuse into seven languages, including Kinyarwanda and Portuguese.

Non-UN IASC organizations refer to a range of measures including zero tolerance policies; Codes of Conduct with specific provisions on sexual abuse and exploitation; and organizational protocols on whistleblower retaliation, anti-harassment, child safeguarding, and so forth. In July 2017, InterAction surveyed members on preventing sexual harassment policies, procedures and processes. Of those who participated in the survey, 88% defined their policy as "zero tolerance" and 80% reported having complaints and investigations mechanisms for staff to report sexual harassment incidents. Specifically, World Vision reported setting global standards to safeguard children, communities and staff from sexual exploitation and abuse as well as sexual harassment and assault that World Vision offices worldwide align themselves with. IFRC coordinates its efforts on this issue with 191 National Societies and has called on all members of the Movement to adopt zero tolerance policies; currently, 50 National Societies refer to PSEA in their society-specific Code of Conduct and the Kenyan Red Cross Society has gone even further by putting in place a specific policy on PSEA.

In some IASC organizations such as IFRC and IOM, staff joining the organizations are expected to sign key documents such as Codes of Conduct.

One **tool** that exists is offered by the CHS Alliance which enables organizations to conduct a self-assessment against the Core Humanitarian Standard, using one of the four options (self assessment, peer review, independent verification and certification). The self-assessment extracts a detailed PSEA score (taken from 18 of the 62 indicators) and provides a comprehensive picture of different elements contributing to effective work on PSEA in an organization. The score is fed back to the individual organization and provides a way of tracking progress on PSEA.

³ English, French, Spanish, Russian, Arabic, Farsi, Thai, Urdu and Turkish

Interaction uses the PSEA audit tool to assess areas for improvement, including review of policies, their enforcement, and the adequacy of systems supporting implementation. In this way, every staff member, volunteer, donor, and future and current homeowner [i.e. beneficiary] understands how to access My Safe Workplace and Community-based Feedback and Complaint mechanisms, and accordingly anyone who feels they have witnessed inappropriate behaviour or has been treated inappropriately themselves can report those situations without fear of retribution.

Another tool to track performance has been established by Keeping Children Safe – an entity which provides standards, support and guidance to organizations to prevent the risk of abuse and exploitation of children. Keeping Children Safe assesses organisations against a comprehensive set of indicators and then develops an implementation plan for each organisation to demonstrate that they meet international child safeguarding standards.

In 2018 WFP created an internal control self-assessment to assist Country Directors in identifying compliance with WFP's PSEA normative guidance.

Meanwhile, UNICEF's Executive Director has commissioned **an independent review on policies and systems involving PSEA**, and an external review team is assessing the organization's response to sexual harassment and another reviewing gender and cultural concerns. The PSEA review is scheduled to be finalized by 30 June and will be made public.

The IASC Task Team on PSEA provides inter-agency guidance and support to organizations on preventing sexual exploitation and abuse through a variety of channels, including a **helpdesk**. The IASC Task Team on PSEA is working on mainstreaming PSEA into the Humanitarian Programme Cycle (including Humanitarian Needs Overviews) by asking specific questions in **multi-sector needs assessments**. By incorporating these questions into the methodology, the levels of risk of SEA and trust in the response and behaviour of aid workers can be identified and acted upon.

Finally, the UN also has several mechanisms to coordinate policy, tools and action in response to SEA and SHA across the UN system⁴.

2. Whether we have effective means of communicating to our staff what our standards and expectations are, including guidance material, training and other systems to ensure no-one who works for us can credibly claim not to understand what our rules, norms and expectations are.

Training is the principal way that most IASC organization communicate policies, standards and expectations to staff. A notable example is FAO's learning module on harassment, sexual harassment and abuse of authority which is delivered by its Ethics Office and explains to personnel the difference between sexual harassment and sexual exploitation and abuse and the different reporting procedures and rules. Newly appointed FAO managers also receive a detailed briefing on prevention of harassment and their role in creating an environment free of harassment. Oxfam and UNFPA provide induction training on SEA/SHA; the former also includes tailored induction sessions for senior managers. In partnership with UNICEF, UNFPA and UN Women – UNDP launched a mandatory course on SEA in 2017 which being translated

⁴ including a UN Special Coordinator on Improving UN Response to SEA; UN High-level Steering Group on SEA; the UN Working Group on SEA4; UN CEB Task Force on Addressing Sexual Harassment; etc.

Examples of activities to improve coordination and coherence across the UN system include preparing a uniform complaint/reporting form that seeks to streamline and unify data collection, developing uniform protocols on victim assistance, for coordinating the provision of services, and on handling allegations, information-sharing and the protection of victims, to increase coordination and minimize trauma to victims and witnesses during investigations, and developing a basic toolkit for managers and leaders in the field to guide in prevention and response.

into Arabic, French and Spanish. Many UN organizations have mandatory training e.g. *Prevention of Fraud, Corruption and Sexual Exploitation* and the *United Nations course on the Prevention of sexual harassment and abuse of authority* that provide guidance on the UN's policy and procedures on harassment.

IOM has developed a 3-day training for PSEA networks on establishing inter-agency Community Based Complaint Mechanisms (CBCM), as tasked by IASC, which is based on good practices and lessons learned from previous projects and training delivered by IOM in different contexts. Training is delivered at the request of country teams, with the purpose of strengthening CMCM within the PSEA response. The training covers a broad spectrum of issues, including complaint handling and referrals, multi-stakeholder engagement, victim assistance and M&E.

Most organizations reported that they actively monitor training completion, some by including targets in performance appraisals (WFP). OHCHR carries out 360° evaluations of its managers, which includes assessing their performance on fostering a respectful and harassment-free working environment. Notably UNICEF reported its course completion rates are about 90% (SHA) and 95% (PSEA). UNFPA, OHCHR and UNICEF are aiming for compliance rates of 100% for the completion of training.

Means of communication include posting policy, guidance and/or training materials on dedicated Intranet pages and on the IASC Task Team on AAP/PSEA's website; providing information through the employment cycle, including applicant screening and on-boarding processes; sending targeted emails reminding staff of policy (e.g. WFP, OCHA, OHCHR, UNHCR); holding townhall meetings (OHCHR); and carrying out awareness campaigns and staff surveys on issues such as harassment and abuse of authority (OHCHR, WFP). In 2016, WFP conducted a three-part awareness campaign against sexual violence, sexual harassment, and sexual exploitation and abuse; in addition, it is currently working on a WFP-wide "Respect" campaign designed to help employees create and preserve a respectful and equitable workplace while isolating and eliminating harassment and abusive behaviour. In 2018 UNHCR launched a *Stand Up and Support* campaign on how to be an active bystander. UNDP is also leading a comprehensive outreach campaign on SHA.

Since February 2018, WFP Security Officers have been including information specific to prostitution as SEA and prohibited conduct in their briefings to visitors and Headquarters and Country Offices.

Some IASC organizations reported using **infographics** to outline the procedures for reporting allegations and multi-media materials. FAO has a multi-language video message on policy implementation. OHCHR is designing infographics to clarify definitions (including the distinction between "sexual exploitation and abuse" and "discrimination, harassment- including sexual harassment- and abuse of authority), reporting procedures and available avenues for corrective measures.

UN agencies also reported using "No Excuse" cards – which include a concise and portable statement of UN rules and prohibitions related to sexual exploitation and abuse and provide contact details for reporting allegations. To collectively address sexual abuse, exploitation, and harassment of and by NGO staff, 119 organizations, including InterAction, made a [CEO Pledge on Preventing Sexual Abuse, Exploitation, and Harassment by and of NGO staff in 2018](#).

Several IASC organizations reported having **internal positions or mechanisms** – for example, a CEO task force (InterAction); senior coordinator and working group on SEA and SHA (UNHCR); ethics focal points (FAO); taskforce on SHA (UNDP); inter-divisional standing

committee (WFP); PSEA Vetting Task Force (International Medical Corps); core PSEA interdepartmental team (Interaction) – to lead and work on SEA and SHA.

3. Whether we have systems and processes staff and others have confidence in through which concerns about non-compliance with our norms and standards are raised. This includes things like our whistle blower systems, help lines, victim support etc.

Most IASC organizations have several **channels to report incidents**, such as dedicated confidential email addresses, helpdesks, specific senior managers and web-based platforms (e.g. UNFPA in 6 languages). Several organizations reported having a **hotline** to report misconduct or have plans to establish one. Organizations reported hotlines being either internally or externally managed and 24 hours a day. Most hotlines have trained and experienced responders or investigators (some with gender parity) answering calls. World Vision established a confidential Integrity and Protection (Whistleblower) Hotline almost ten years ago, available to anyone inside or outside of the organisation; a report can be made by phone or online, www.worldvision.ethicspoint.com. World Vision also actively monitors project areas, including establishing feedback and complaints systems for affected communities. In Oxfam, incidents can be reported to management directly or through a global, third party independent whistleblowing hotline which is available to staff, partners, and beneficiaries and is accessible in a number of languages. Oxfam uses a centrally-led case management system for handling and investigating all reports of sexual misconduct. Habitat for Humanity International HFHI has an online portal (called My Safe Workplace) to confidentially report workplace issues. They benefit from the support of a pro bono labor and employment law firm which supports affiliates, including on SHA issues. Save the Children is planning to introduce an external hotline and an online reporting system (Datix).

WFP has an internally managed, confidential hotline available to WFP staff and others, with plans to outsource its management to enable enhanced anonymous reporting, 24/7, and in multiple languages. IFRC has a third party anonymous reporting line (Safe Call UK), whereby calls can be grouped by geographic location, type of allegations, etc. UNHCR is also setting up a 24/7 hotline which will be managed by an external service provider and will be accessible in different languages. WHO's integrity hotline constitutes a unique mechanism allowing people (staff as well as the wider public) to report concerns that something of an unethical nature may be occurring involving WHO, even anonymously.

UNICEF is piloting an anonymous 'one-click' mechanism to register incidents of sexual harassment, to alert management to an issue in the office environment that needs to be addressed. It is also adapting the cellphone-based "U Report", currently in use in 40 countries, to make reporting safe and accessible to vulnerable communities and to reach child victims. IOM's MigApp is a secure, user-friendly downloadable application that was released worldwide in December 2017 and is accessible by beneficiary populations and staff members, which contains a reporting link that goes directly to the Ethics and Conduct Office.

FAO (ethics focal points), International Medical Corps (PSEA focal points) and OHCHR (dignity contacts) reported creating **networks of staff** who share the information on staff rights and responsibilities as well as the options available under various policies. OHCHR's "Dignity Contacts" confidentially "sign post" affected colleagues to the full range of options (formal and informal) available to them. About 20 staff members from different duty stations, grades and functions, form the network. They have been provided with training and asked to sign a confidentiality undertaking. Anonymized information collected by them, with the consent of staff affected, will help track prevalence and adjust prevention strategies as needed.

UNCHR has **Respectful Workplace Advisors (RWAs)**, a trained network of staff whose role is to provide individuals with a confidential contact point and be a source of information and

support, to serve as a sounding board and to provide guidance on accessing appropriate support services available. Peer Support Personnel (PSP) are a trained network of staff members who volunteer to offer support to their colleagues in dealing with personal and work related problems, including colleagues experiencing harassment in the workplace.

UNHCR has also established a **PSEA Focal Points** system and created a **Community of Practice** using Yammer (a web based platform) to enhance information and good practice sharing. Over 270 staff are currently registered on the platform.

An important principle of managing cases of sexual harassment, exploitation and abuse is that it is **survivor-led**. As part of standard operating procedures, organizations provide psychological, medical and other support for affected staff. Of the 42 organizations who participated in InterAction's July 2017 survey, 36% reported they provide counselling and/or medical assistance to victims, although the level of psychological support varies across organizations. UNDP plans to contract a counselling service for staff affected by SEA which will be available in 6 languages. IFRC and WFP have 24/7 numbers to call, a Senior Health Officer and a dedicated Critical Incident Management Hotline respectively. The UN has also developed and field tested a protocol on the provision of assistance to victims of SEA which aims to strengthen the UN system approach to SEA victim assistance and to clarify the inter-agency governance structure at field level on PSEA.

UNHCR is part of the Task Force on SEA Allegations involving implementing partners under the leadership of UNICEF and UNFPA. The Task Force focuses on developing a "uniform protocol" that looks to strengthen a common approach across the UN system for how SEA allegations involving implementing partners are reported and addressed, as well as prevention and other related issues. The Task Force has drafted an Outline for United Nations Protocol on Protection from Sexual Exploitation and Abuse Involving Implementing Partners. The Protocol has two Annexes: Reporting SEA allegations and incidents; and the Draft Uniform Policy on balancing disclosure of information for accountability for alleged SEA with principles of confidentiality.

Finally, the UN Secretary-General and specific UN agencies report annually on the outcome of all investigations and disciplinary measures, including those relates to SEA and SHA cases and inter-agency community-based **complaints mechanisms** (CBCM).

4. Whether our investigatory capacities are where we need them to be. This includes both the resourcing level needed, to ensure that complaints or concerns can be investigated promptly, and the skill sets in the relevant functions to ensure that complainants are handled in the right way and that investigations are effective.

Investigations are generally governed by various **internal frameworks and principles**. For example, UNFPA's Disciplinary Framework sets out the investigative process in general, while its Harassment Policy governs aspects specific to harassment investigations. UNFPA investigations are conducted in line with its oversight policy; financial regulations and rules; and the Uniform Principles and Guidelines for the Conduct of Investigations of the Conference of International Investigators. The purpose of UNHCR's Operational Guidelines on Conducting Investigations and Preparing Investigation Reports is to assist the Inspector General's Office in the discharge of its responsibilities when investigating possible misconduct. It applies to all UNHCR staff members and any entity or person that has a contractual link with UNHCR as subjects or participants in an investigation; it explains their roles, rights and obligations as well as the investigation process and provides guidance to investigators on conducting investigations and preparing investigation reports.

For UN entities, **investigatory capacity** is located in a separate audit and investigation unit or an inspector general's office, mandated to conduct all investigations for the organization, including those of SEA, sexual harassment and abuse of authority. WFP reported that its most sensitive cases were handled by third party experts to ensure that SEA and sexual harassment cases received immediate attention and independent review; it also engaged a consulting firm, specializing in SEA and sexual harassment cases, to review its current processes and internal investigatory capacity. Many UN IASC members are part of the SEA Task Force of the UN Representatives of Investigations Services (UNRIS).

Other good practices noted included: having a multidisciplinary team of lawyers, law enforcement professionals and other professionals, who undergo regular investigative training, including on SEA and SH (UNFPA); trained and experienced investigators who speak several languages; a gender balanced investigations team (Habitat for Humanity, FAO); access to professional investigations consultants to supplement internal capacity during peak times; etc.

World Vision manages allegations of abuse through a global incident management team and the type of incident determines whether the investigation would be conducted by human resources or its audit investigation team. The International Catholic Migration Commission (ICMC) believes that only outside investigators have the required expertise and independence to investigate serious incidents of SEA and SHA, in particular any incidents in which senior managers may be implicated. It has therefore established a stand-by Framework Agreement with specialized and trained investigators from an outside company to lead a robust and independent investigation. ICMC also believes that concluding a Framework Agreement for stand-by capacity sends a clear message within the organization that such incidents will not be tolerated and that it may help to deter potential perpetrators.

Training is a critical component to maintain and develop investigators' skill sets. For the UN system, the Office of Internal Oversight Services (OIOS) trains UN investigators on reviewing allegations, including on forensic interviewing of child victims of abuse, and coordinates the harmonization of investigation methods and approaches across the various UN investigatory bodies. Most UN entities also reported having additional, internal training for their investigators (WFP). UNHCR reported that it provides some training to NGO partners - for example in 2017 it trained its staff and NGO partners in Rwanda in order to build capacity to detect cases of SEA and provide assistance to survivors.

5. Whether we have the right approaches to sanctioning staff, who are found to have acted egregiously

IASC organizations reported having policies and processes to ensure both the mechanisms and management responsibilities are in place to sanction staff when necessary. In cases of confirmed inappropriate behaviour, most reported that the consequences include robust disciplinary action, such as dismissal, suspension, written censure or other administrative/corrective measures as well as reporting the incident to law enforcement authorities for criminal prosecution. Those that are being investigated are also limited in professional advancement opportunities.

Some organizations have specific measures to hold managers accountable for taking appropriate action. FAO managers are required to undertake specific training and to implement policy; any manager permitting the existence of an environment that tolerates sexual harassment could face disciplinary measures. For some IASC organizations, failure to report wrongdoing may also be considered as misconduct.

6. Whether we have the systems we need to ensure that information on staff who have been found to have transgressed is available to others across the sector.

Humanitarian organizations have the common objective of employing only the right individuals i.e. those who meet high integrity requirements. IASC organizations are committed to sharing information on former staff members, to prevent transgressors from moving freely from one agency to another, but legislation related to employment, privacy and data protection limits them from doing so in certain contexts. This is why 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.

Other examples to prevent hiring perpetrators of misconduct include: the use of **pre-screening questions** as part of the application process (UNHCR, UNICEF); the establishment of a system of **accredited referees** (Oxfam); the development of an internal **database of disciplinary measures** on staff, including dismissals, to avoid rehiring them at a later point in time (WFP).

Notably, many UN organizations reported using a **joint reference checking centre**, which requires referees to answer a mandatory question on PSEA (UNFPA) – a first step to prevent people from being ‘recycled’ in the UN system. [InterAction’s CEO Pledge](#) includes a commitment to discuss and share best practices around the issue of perpetrator disclosure. InterAction supported a workshop exploring US and UK legal issues surrounding perpetrators with the International Center for Non-Profit Law and K+L Gates.

The UN System Chief Executives Board for Coordination (CEB) has agreed to establishing UN system-wide, centralized databases and screening tools (SEA and SHA ‘trackers’) to avoid rehiring transgressors. Many UN organizations that are part of the IASC have joined the two trackers that are expected to go live this summer.

Please see IASC Principals discussion paper entitled Preventing transgressors moving through the humanitarian system dated 31 May 2018, which provides more detail.

RECOMMENDATIONS FOR IASC PRINCIPALS

1. Agree to make the good practices document publicly available on the IASC website.
2. Task the IASC Secretariat to periodically update the good practices document.
3. Agree to making detailed agency-specific reports (already provided) available on the IASC website (password-protected)