

Handout One A: Investigation Manager or Investigator?

Participant Puzzle

Receive and handle the SEA and SH complaints that come to them directly to them or through other reporting mechanisms	Assist in investigation planning and risk assessment	Facilitate the implementation of plans to meet the needs of the survivor(s) and/or complainant, specifying their need for protection, including possible relocation and any health/medical and psycho-social needs	Decide who needs to know and briefing those individuals (such as a supervisor in the event of an alleged perpetrator's suspension or transfer)
Decide whether to suspend or redeploy the alleged perpetrator during the investigation	Complete a Terms of Reference	Review recommendations on outcomes	Decide who needs to know and briefing those individuals (such as a supervisor in the event of an alleged perpetrator's suspension or transfer)
Ensure staff cooperation, find a facility for private interviews.	Find Interpreters	Inform organizations if they implicated in the allegations	Check personnel records to establish any prior complaints/investigations against a specific individual
Make recommendations on whether the subject of the complaint (SoC) should be suspended with pay during the investigation	Develop a written plan of investigation	Gathering and analyze evidence, making recommendations	Interview witnesses
Write investigation report	Make recommendations	Assess/review and advise on matters pertaining to the needs of the survivor/victim and other witnesses	Produce findings

Handout One B: Investigation Manager or Investigator?

Facilitator Copy

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Make recommendations on whether the subject of the complaint (SoC) should be suspended with pay during the investigation	Develop a written plan of investigation	Gathering and analyze evidence, making recommendations	Interview witnesses
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Light Grey = Investigator Manager Tasks

Dark Grey = Investigator Task

Handout Two: Case Study

WORLD WITHOUT POVERTY CASE STUDY

World Without Poverty is an international NGO that provides humanitarian and development services throughout the world. Services include health care, food and non-food items (NFIs) distribution, agricultural projects, micro-finance, etc. Four months ago, the international NGO hired data enumerators to help with a community assessment project. The data collection part of the project is expected to last about 3 months.

Davu, as Senior Program Officer, was responsible for coordinating the data collection including hiring the enumerators from the target community. Several weeks into the project, rumors started to surface in the community that Davu was giving work to some female enumerators in exchange for sex. The rumor was reported by a community member to Jamila, the Program Manager. Jamila started to question the truthfulness of the reporter when the reporter explained that she did not directly know anyone who given a job by Davu in exchange for sex, could not provide any specific examples or provide Jamila with the names of any of the women who were involved. Jamila supervised Davu and had worked with him for a long time, and she did not believe he would do such a thing.

A week later, a security guard, Zane, reported to Jamila that he saw a woman leaving Davu's apartment in the compound. He said he recognized the woman, Amari, as being on the data collection team. He explained that he had stopped Amari and asked her why she was coming to see Davu. Zane reported that Amari started to cry and said she did not want to get into any trouble or lose her job. According to Zane, Amari asked Zane not to tell anyone that he had seen her visiting Davu. Jamila decided that she would report this incident to the Safeguarding Unit.

Later, Amari told Zane that she lost her job. She said Davu told her that her contract was up, but Amari claims she was the only data collector who did not have her contract renewed for an additional 2 months. Amari thinks it is because Davu saw her with Zane, and that Davu thinks she may have said something to him. She started to cry and said she really needed the job. She said she did not want to go to Davu's apartment, but he was her boss and she had to do what he asked of her.

The Safeguarding Unit Director recommended that Davu should be placed on a paid administrative leave while an investigation was being conducted.

Handout Three: Questions for World Without Poverty Case Study on Key Investigation Principles

PRINCIPLE: CONFIDENTIALITY

Principle Description

Confidentiality – Complainants or survivors, witnesses and subjects of a complaint have a right to confidentiality. In some instances, it will not be possible to guarantee confidentiality (for example, where referral is made to national authorities, or where the witness' identity will be readily inferred). Information needs to be shared on a 'need to know' basis with the parameters of this being established at the planning stage. The identity of those involved should only be disclosed on an authorized basis where referral to national authorities is indicated. Records should be stored securely to avoid accidental or unauthorized disclosure of information.

What are the issues related to this principle?

How can the principle of confidentiality be upheld during the investigation?

PRINCIPLE: SURVIVOR CENTERED

Principle Description

Survivor-centered Approach —is based on a set of standards and skills designed to guide professionals-- regardless of their role—in their engagement with survivors (predominantly women and girls, but also men and boys) who have experienced sexual harassment or abuse. The survivor-centered approach aims to create a supportive environment in which the survivor's rights, safety and confidentiality are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions on how involved they wish to be in an investigation.

Why is this principle important to the investigation in this case?

How can the principle be applied in the investigation?

PRINCIPLE: SAFETY AND SECURITY

Principle Description

Safety and security— steps to promote safety might include relocating the subject, relocating the witness or maintaining an effective security/ law enforcement presence. While the organization may not be able to guarantee safety, it is essential that a survivor/witness plan is developed and reviewed. The survivor/witness must be advised as to the limits of the organization's capacity to protect (where such exist).

Are there potential safety or security risks to the victim?

Who else might be at risk and what are the safety risks to consider?

PRINCIPLE: HEALTH AND WELL-BEING

Principle Description

Health and well-being – The health needs and well-being of victims are critical. The organization staff assigned to conduct investigations should not undertake to address these concerns themselves, but they have an obligation to ensure that these matters are referred to the leader in the organization who can attend to these needs in a confidential manner throughout the investigation process. This includes medical care, psycho-social support, counselling, etc.

What immediate support concerns should be considered?

What are the potential psycho-social risks for the victim?

How might the investigation facilitate the health and well-being of the victim going forward?

PRINCIPLE: TRANSPARENCY

Principle Description

Transparency: Victims/survivors need to be informed of reporting processes and how their report will be handled, such as who will be involved. Suspects too should also understand the consequences for offenses. Witnesses need to appreciate the demands of confidentiality to protect the integrity of investigation. Non-retaliation must be a key message, with encouragement for reporting retaliation in order to best protect that person in the workplace.

What are the issues related to this standard?

How can the principle of transparency be upheld during the investigation?

PRINCIPLE: IMPARTIALITY

Principle Description

Impartiality - investigations must be conducted in a fair, equitable and unbiased way. Investigators must be free of any influence that could impair their judgment. Investigators have no personal or professional interest in the people implicated or the project. Also, investigators must be allowed to conduct a fair and unbiased investigation without interference from others.

How was the impartiality of the process compromised?

How do you apply the principle of impartiality to the investigation?

PRINCIPLE: PROFESSIONAL CARE AND COMPETENCE

Principle Description

Professional care and competence - All those involved in the investigation must have training, skills and knowledge to fulfill their responsibilities. Only trained investigators should investigate allegations of sexual misconduct. Investigations must be conducted in a diligent and rigorous manner to ensure that all relevant evidence is obtained and evaluated, including evidence which might either support or refute the complaint. All concerned have the right to be treated with respect and dignity and to be kept informed of the progress of the investigation.

What might impact professional care and competence?

How can the principle of professional care and competence be upheld during the investigation?

PRINCIPLE: PLANNING

Principle Description

Planning – to ensure that investigations are planned, systematic, and completed according to agreed timeframes.

What are some of the planning considerations in this case?

How can the principle of planning be upheld during the investigation?

PRINCIPLE: TIMEFRAMES

Principle Description

Timeframes – it is in everyone's interest that investigations are conducted as quickly as possible without compromising quality. A number of factors (communication systems, travel, distance, etc.) will influence what is a reasonable timeframe. As a general rule, investigations should be completed as soon as possible (for example, final report submitted) within 30 days of receipt of complaint.

In what ways have the parties failed to adhere to timeframes?

How can the standard of adhering to timeframes be upheld during the investigation?

PRINCIPLE: WORKING IN PARTNERSHIP WITH OTHER INTERESTED PARTIES

Principle Description

Working in partnership with other interested parties – In some cases other INGOs or national NGOs might be implicated in the complaint. In such instances, consideration needs to be given to conducting a joint investigation in the interests of sharing relevant information and preventing the need for repeated interviews.

What if Amari had been subcontracted from a partner?

How can the principle of partnership be upheld during the investigation?

PRINCIPLE: ACCOUNTABILITY

Principle Description

Accountability —Many donors require that NGOs receiving funding from them report all cases of sexual exploitation and abuse of the beneficiary population that is allegedly perpetrated by NGO workers. USAID and all UN agencies require this reporting. Generally, a donor is not involved in investigating a report of sexual misconduct allegedly perpetrated by a worker of an NGO receiving funding from them. However, they do require NGOs to report on actions taken by them to address the allegation and results of investigations.

Also, a case in which a crime appears to have been committed, consideration needs to be given to informing national authorities. This can be a very challenging decision if there are doubts as to the integrity of police/ legal systems. The decision to inform the authorities should be taken by the organization's attorney. The decision to refer to national authorities will hinge on a number of factors and needs, which should be taken into account by the management in consultations with an attorney. Survivors should be involved in the decision-making process.

How would you address the principle of accountability in this case?

What issues should be considered in deciding whether to inform the national authorities?

Handout Four A: Managing Risk and Making Choices

Instructions

Print and distribute one copy of these instructions for each group. You will also print off cards/ paper in large type with Steps 1 -13 from the next page "Choose Your Own Adventure." **Ensure that each step is on a separate piece of paper, and that the steps are in order when you give them to each group.**

Instructions

1. Every group has a set of cards in front of them, and everyone must start with card #1.
2. On each card you are presented with a developing scenario and you are given options in terms of how you will respond. You will be directed to your next card depending on your response. Please do not scroll through the different cards. Follow the numbers based on the instructions on the cards. You may wish to place the cards on the floor/table in front of you as you proceed through this maze because you will be asked to share the highlights of your journey at the end of this session with the group.
3. If you finish this activity quickly, please go back and make different decisions to see what other outcomes could have happened.
4. Be prepared to share some of the highlights and challenges of your group's maze with the rest of the group.

Recall the allegations that we received so far in our Case Study:

- Jamila, the Program Manager received a report from a community member named Davu. The Senior Project Officer was hiring female short-term data collectors from the community in exchange for sex. The community member did not provide names or details, other than this rumor.
- Zane, the security guard, observed Amari, a data collector, leaving Davu's apartment in the compound. He asked her why she was visiting Davu, and she broke down crying, begging him not to tell anyone. Zane informed Jamila of this incident.
- Jamila reported all the information she had to the Safeguarding Unit.
- Amari later approached Zane and told him that she lost her job. She said that Davu said her contract was up, but she was the only data collector who did not have her contract renewed. Amari thinks Davu saw her talking with Zane when she left his apartment. She stated that she didn't want to go there, but he was her boss and she had to do what he asked.

You are the Head of Office where the allegation occurred, and will be working with the Safeguarding Unit Director to help support the management of the investigation process, including identifying and addressing risks at this early stage of the handling of the allegation.

Handout Four B: Managing Risk and Making Choices

Print off one copy of the maze (steps 1-13) for each group. Ensure that each step is on a separate piece of paper, and that the steps are in order when you give them to each group.

- 1. The Safeguarding Director recommends that Davu should be placed on administrative leave while the investigation is being conducted.**
 - a) You are too short-staffed to put Davu on leave, so you are putting him on desk duty in the office and do not allow him to go to the field, telling him there are complaints about his behavior in the field and you want things to settle down before he goes back out there. (Go to 2.)
 - b) You don't think you have enough to investigate, so you decide to talk with some of the staff and data collectors on Davu's team to get a better understanding of the situation. (Go to 3.)
 - c) You decide to put him on administrative leave, but don't order him to return to his home which is another part of the country. (Go to 5.)
- 2. You learn that Davu has been speaking with the junior officers and staff and aggressively asking them to tell him what are the complaints out there in the field about him.**
 - a) You call a meeting with all the staff on Davu's team to understand what is happening. (Go to 3.)
 - b) You place Davu on administration leave and have him return to his home in another part of the country. (Go to 6.)
 - c) You decide to contact the community member who first reported rumors to Jamila and see if they would be willing to share more information with you, since you are the Head of Office. (Go to 3.)
- 3. With the questions you are asking about Davu, you learn that rumors are circulating in the community that Amari was having an affair with Davu, and that she was fired because she was engaged in this relationship in violation of the organization's rules.**
 - a) You decide to reach out to Amari to see how she is. (Go to 4.)
 - b) You are waiting for further instructions from the Safeguarding Unit. (Go to 2).
 - c) You place Davu on administration leave and have him return to his home in another part of the country. (Go to 6.)

- 4. You are the first person to reach out to Amari. You can't reach her by phone. You ask Roberta, another data collector, if she can connect you with Amari. Roberta tells you that Amari left the village to stay with her aunt in the city because her father was ashamed of her when he learned she was sleeping with a married man from work.**
 - a) You decide that you need to place Davu on administrative leave and have him return to his home in another part of the country pending the full investigation. (Go to 6.)
 - b) You report to the Safeguarding Unit that Amari is gone and that there is no way to conduct an investigation. (Go to 7.)
 - c) You believe that Amari is probably in a better, safer place and you vow to keep a better eye on Davu. (Go to 7.)
- 5. Jamila said that some people have approached her and have reported seeing Davu going into the village where Amari lives, and that many of the program staff have been seen visiting his apartment in the compound. (Go to 2.)**
- 6. You place Davu on administrative leave and have him return to his home in another part of the country. You did not consult local lawyers when placing him on leave, and learn that it did not provide sufficient notice that he was being placed on leave because he was under investigation for violating the PSEA policy. He already has a lawyer, who is demanding that he be returned to work because you haven't followed proper procedures or they will file a lawsuit. (Go to 13.)**
- 7. The remaining three female enumerators have all decided not to come to work, because they don't want the reputation that they got their jobs by having sex with the Senior Project Officer. The rumors in the community are that the only females who get hired at the organization are those that have sex with the boss.**
 - a) You reach out to the Safeguarding Unit with the new information. (Go to 10.)
 - b) You decide to go out to the community to calm tensions and personally assure the community leaders that the organization does not work like that, while awaiting feedback from the Safeguarding Unit. (Go to 8.)
- 8. While visiting with the community leaders, you learn that Amari tried to commit suicide in the city. One of the data collectors stops you on your way out to let you know that she is very worried about Amari. She is also worried for herself and the other data collectors, because everyone thinks they are having the same type of relationship with Davu and even their families are not treating them well. (Go to 9.)**

9. During the meeting with community leaders, one of the leaders brings in his daughter, Maya, who claims that she filled out an application and tried to get a job as an enumerator, and when she refused to be the girlfriend of the boss, she was not hired. Back at the office, you reviewed all the applications when hiring for data collectors, and there was none from someone named Maya, even though H.R. received more than 50 applications for 4 positions. Meanwhile, the leader and his daughter are speaking with local media about this experience and saying they are getting a lawyer. (Go to 10.)
10. The Safeguarding Unit sends an independent investigator to the country to lead the investigation and requests that you nominate a staff member to support them in making arrangements for collecting documents, arranging interviews, etc. If you had held any discussions about allegations with any staff or community members, you may have jeopardized the whole investigation process. If you did not initiate conversations with anyone about the allegations, the investigation process will likely proceed with better safeguards in place for integrity and confidentiality.
THE END.
11. One of the Assistant Officers, Franz, approaches you. He heard the rumors about Davu having sex with data collectors. He doesn't know anything about it for certain, but Davu would often joke with him in the field about which girls they should take as girlfriends. He wanted to tell you this because he thinks the rumors are probably true, and you should do something about it and investigate. But he doesn't want to be involved. He is not just afraid of losing his job. His family and Davu's family are close back in their hometown. If his family learned he spoke badly about Davu at work or caused him to lose his job, he would be disgraced, and his family might even be targeted by Davu's family for harm.
 - a) You decide it is another coincidence and not really important information as it doesn't prove Davu was having relationships with anyone. You want to maintain this person's confidentiality so you keep it to yourself. (Go to 7.)
 - b) You decide to immediately place Davu on administrative leave for sexual harassment and have him return to his home in another part of the country. (Go to 6.)
 - c) You try to get some more details from Franz during your discussion. (Go to 12.)

- 12. Franz tells you he had never seen Davu with any young women in the community outside of work, even data collectors. But he does recall that Roberta, one of the current data collectors, was someone that Davu spoke a lot about—how pretty she was and how she would make a good girlfriend. Davu said everyone should stay away from Maya, because she was the community leader's daughter, and a person could get in a lot of trouble messing around with her.**
- a) You reach out to the Safeguarding Unit with all the new information. (Go to 10.)
 - b) You consider the information still too vague to be useful (Go to 7.)
- 13. You are forced to return Davu to the office, until you can coordinate with the lawyers to prepare the letter with enough information to suspend Davu. Meanwhile, the Safeguarding Unit has asked you to start collecting some documents for them to review. They have asked for the visitors' log to Davu's apartment in the compound. You notice that the day Zane observed Amari visiting Davu's apartment, it has a crossed out entry with the name of Davu's colleague and close friend, Jerome, written over it. As you flip through entries, you notice similar entries crossed out, all with Jerome's name, and a pattern of certain days and times, usually just after working hours.**
- a) You have to wait until you get approval from the lawyer to take action against Davu. (Go to 5.)
 - b) You are still collecting other documents and will share them all at once with the Safeguarding Unit. This just seems to be a coincidence. (Go to 11.)
 - c) You immediately place Davu on administrative leave for forging documents and have him return to his home in another part of the country. (Go to 6.)

Handout Five: Investigation Planning Checklist

Investigation Overview

- ☐ Summary of Complaint
- ☐ Factual description of alleged events to be investigated
- ☐ List of possible policy violations
- ☐ Location of incident(s)
- ☐ Referral received (date)
- ☐ Investigation and response team members
- ☐ Estimated timeframe for completion of the steps of investigation

Parties involved

- ☐ Reporter(s) (sometimes also the victim/survivor)
- ☐ Staff suspected of wrongdoing
- ☐ Witnesses
- ☐ Other involved organizations

Survivor support

- ☐ Health
- ☐ Psycho-social
- ☐ Legal

Risks to the investigation

- ☐ Destruction of documents or altering evidence
- ☐ Delays that impact collection of evidence or ability to finalize process in timely manner
- ☐ Lack of cooperation
- ☐ Fear of retaliation at work or out in the community
- ☐ Collusion between witnesses
- ☐ Intimidating witnesses/survivors
- ☐ Media concerns
- ☐ Not following local labor laws
- ☐ Other risks

Safety and security considerations

- ☐ For survivor or reporter
- ☐ Witnesses
- ☐ Staff suspected of wrongdoing
- ☐ For other staff

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- ☐ For survivor or reporter
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Sources of evidence and information

- ☐ Documents including electronic evidence (text messages, call histories, social media, emails, etc.)
- ☐ Records confirming time and locations
- ☐ Employee handbook/policies
- ☐ On-site location review/investigation
- ☐ IT support
- ☐ Local labor laws

Other important investigation considerations

- ☐ Confidentiality
- ☐ Timeline
- ☐ Order of interviews and locations
- ☐ Translation support for interviews
- ☐ Legal considerations
- ☐ Donor notification
- ☐ National authorities
- ☐ Internal/external communication plans
- ☐ Record and documentation security

Handout Six: Investigation Plan Template

ALLEGATIONS

List each allegation including date reported and how it was reported. List each allegation separately with a heading of the offense, such as "Sexual Exploitation," "Sexual Harassment."

COMPLAINANTS

Where known: If there are special concerns about security, their names could be withheld in this document and referred to by status (staff, female community member, male child beneficiary, etc.)

SUSPECTS

Names, positions and program (if relevant)

INVESTIGATION & MANAGEMENT TEAM

List members of the investigation team (Lead Investigator, Assistant Investigator) and Investigation Management Team, (Manager and others who will be assisting with coordination on the ground).

BACKGROUND OF ACTIVITIES

Briefly describe the scope of the work of the organization and the work being done where the allegations occurred to provide context.

STEPS TAKEN PRIOR TO INVESTIGATION

Describe any activities that occurred prior to the investigation, such as steps that management may have taken.

INVESTIGATION TIMETABLE

Investigations can change and run into obstacles, so try to include broad and realistic ranges for things such as document review, conducting interviews, and finalizing the report.

INVESTIGATION APPROACH

Document Review: Can include things such as:

- a. H.R. files for suspects, complainants and reporters (where relevant)*
- b. Employee Handbook for country program and other operating procedures*
- c. Safety and Security Protocols*
- d. Any prior complaints on suspect*
- e. Documents or documentation provided by complainant or witnesses*

Electronic records (if needed)

Should the investigator determine it is warranted, access to and review of emails or phone records that might contain evidence of the wrongdoing should be obtained, in accordance with local law. Possible text messages from witnesses

Site visit (if needed)

Should the investigator determine it is warranted under the circumstances of the case, a site visit, with photographic documentation of the location/place may occur to help establish any relevant facts of the allegation.

Interviews:

List all identified persons for interviews known at the beginning of the investigation. Additional interviewees may be identified as the investigation proceeds.

No.	Name and Position	Location	Reason for being interviewed	Support required	Interview scheduled for
1.					
2.					
3.					
4.					

RISK ASSESSMENT

Note any risks and indicate mitigation measures. Possible risks include:

- Safety and security of reporter, witnesses, investigators
- Legal considerations
- Confidentiality
- Program/operational risks
- Reputational & media concerns
- Record and document security
- Delays that impact
- Fear of retaliation at work in community
- Collusion between witnesses
- Donor concerns
- Lack of cooperation
- National authorities
- Other risks

Risk Identified	Mitigation Measures	Comments



Handout Seven: Case Study: Piecing Together the Steps of an Investigation

Instructions for facilitator:

Before the training:

1. Print out one document and cut the text of each step into strips, and do not include the numbered step and title—only the text. You should have 10 pieces of paper. Shuffle them so they are in random order.
2. Print out a copy for each participant of the full handout in 11 point font—including all step numbers and headings and the text. This will be used for review in debrief with the whole group.
3. At the beginning of the training, or during a break, post large cards or large post-its around the room with the number and title of each step in the investigation. There should be 10 steps posted around the room.

Instructions for participants during the training:

1. Split the participants into five groups. Provide each group with two separate strips of paper. Be sure to give each group one short reading and one longer reading. Ask the groups to post their text under the appropriate step in the process under the large cards or post-its on the walls in the room.
2. After the groups have posted their steps, ask them to take the smaller Post-it notes, and post on their step with who is involved in this step: “Investigator” or “Investigation Manager.” If both parties have some involvement, you can post them both on the step.
3. Once all the steps are posted, we will review all the steps of this investigation case study from beginning to the end. Be ready to answer some questions about your step, and who is involved in that step.

10 Steps in the Investigation Process

1. Receive an allegation

Jamila sent an email to the Safeguarding Unit and copied the Country Director. She reported that there are rumors in the community that Davu is trading sex with community members for short-term jobs as data collectors. A week after this report, a security guard, Zane, told Jamila that he saw one of the female data collectors, Amari, leaving the apartment of Davu, and was crying when he asked her about it. Amari begged Zane not to say that he saw her because she didn't want to get anyone in trouble or lose her job.

2. Assess and decide next steps

The Safeguarding Director reached out to Jamila to have a follow up conversation. Jamila said the community member didn't give any specific details about the rumor about Davu, so she didn't believe it. But a week later when Zane told her that he saw the data collector, Amari leave Davu's apartment, crying and begging not to tell anyone, she became suspicious and reported it.

The Safeguarding Director reached out to the Country Director to arrange a conversation with Amari with an investigator from the Safeguarding Unit. The Country Director stated that Zane, the security guard, just told him yesterday that Amari approached him and told him her contract was not renewed, although everyone else's was. The Country Director checked with the M&E Manager, Fabia, about the extension of data collector contracts. She said 5 of the 6 were renewed for two months, with Davu telling her that there wasn't enough budget for everyone. Fabia recalls they were all good workers and knows there is plenty of work for all 6 of them.

The Safeguarding Director assigned an Investigator from the region to conduct the investigation in-country, and asked the Country Director to appoint someone to assist the investigator. The Country Director assigned the Safeguarding Focal Point, the H.R. Manager, to assist. The Country Director agreed to provide any necessary support. If it is true that Davu is asking for sex from community members in exchange for being hired as a data collector, that would be a violation of the PSEA policy by trading sex for jobs.

3. Take immediate action if necessary (safety, security, well-being)

The Country Director placed Davu on paid administrative leave in accordance with local labor laws, and returned to his home base.

The Country Director confirmed sufficient funds in the budget and asked the M&E Manager to reach out to Amari to extend her contract and inform her that she would be reporting directly to the M&E Manager, and that Davu is on extended leave and at his home town.

The H.R. Manager (and Safeguarding Focal Point) reached out to Amari with her new contract and apologized for the confusion. The H.R. Manager also offered Amari some contact information about the national staff employee support services—and said that since her contract was reinstated, she should feel free to use the free counseling service, because the H.R. Manager appreciated that the confusion about Amari's contract may have caused some stress.

4. Create an Investigation Plan

The investigators drafted a document for the Country Director to review on the next steps. They listed out the documents that they needed to review:

- Visitor's log book for Davu's apartment in the compound
- Logs of complaints for the community feedback mechanism
- Performance reviews for data collectors and for Davu
- Documents related to the hiring process of data collectors

They listed out the people they would interview, to start:

- Jamila, Program Manager
- Zane, Security Guard
- All junior officers and data collectors on Davu's team
- M&E Manager
- Anyone else identified during interviews who could be a witness
- Davu
- Anyone else identified by Davu who could be a witness

5. Gather evidence: review documents & conduct interviews

The Investigators and the Country Director discussed the best ways to gather the documents and conduct interviews that both preserved the confidentiality of the investigation process and the confidentiality of the witnesses.

Because the H.R. Manager was involved in the investigation, those records are easy to obtain. The Country Director told some teams there was a check/review of some record-keeping documents to check compliance with procedures. The H.R. Manager requested information on the drivers' log books for the past three months, the visitors' log book for the past three months on the guesthouse, and the log for complaints in the community feedback mechanism. The Country Director provided the last two for the investigators.

It was decided that because Davu's team was small—8 in total—it made sense to interview everyone, because they all could have valuable information and that way no one looks singled out as providing evidence. Some of the data collectors were not so strong in English, so the H.R. Manager could translate if they wanted to speak in the local language. However, because there was no private space in the office, the interviews were held at the guesthouse where the investigator was staying.

6. Evaluate evidence, analyze and determine factual findings

The evidence *in favor of* finding that David asked for sex in exchange for promises to get a data collector job:

- After Amari's job interview, Davu said that they should be friends outside of work. He only gives jobs to his friends, so she should come by his house after work. Amari agreed, and went that day after her interview and one other time, when Zane saw her. They had sex both times. She was ashamed and didn't want to, but she needed her job and he was the boss.
- The visitor's log book shows Amari visited Davu's apartment on that day of her interview. On the day Zane saw her, you could see her name written the same way as the first entry, but it seemed someone tried to erase and write over that with the name of Davu's close friend, Jakob. There were several other entries over the next month that looked the same.
- Amari showed text messages from Davu's number asking her to "come by now." They were sent after 5:00 p.m. and about once a week for a month. Amari didn't reply. The visitor's log book shows visits on those days at 5:30 p.m. with Amari's name erased and Jakob's name over it.
- A junior officer, Jerome, who is family friends with Davu, said that Davu often talked about which community members he should take as girlfriends, when they went to the field, especially since they had some jobs opening up. Davu had specifically mentioned Amari as someone he was interested in.
- No other data collectors said that Davu approached them for dates before or after they were hired, but there were rumors Davu was interested in Amari.
- Jamila was surprised to learn that Amari was let go, as she had budgeted for an extension for all 6 data collectors.
- The evidence against a finding that Davu asked for sex in exchange for promises to get a data collector job:
- Davu denied having any relationship with Amari, and she just visited a few times for help with improving her written English. Amari had an interest in him, and he rejected her. Davu let Amari go because she was the last one hired and there wasn't enough money in the budget.
- Davu's close friend, Jakob, at work and junior officer said Amari followed Davu around, and Davu complained about it.
- Davu gets along with everyone on the team and no one would complain about him.

The investigator found that it was more likely than not that Davu did ask Amari for sex in exchange for the promise of getting a job as a data collector. Amari had multiple text messages of Davu inviting her over, which undermined Davu's credibility that Amari was interested in him. Jakob, Davu's close friend, was the only one to give evidence in support of Davu, and he had a motive to lie to protect his friend. Even though Amari only admitted visiting Davu twice, it is likely she visited more times, as indicated by log books with her erased signatures, occurring at times just after David texted her to come by. While Amari did not disclose all details, it was plausible that her omissions were from shame and not admitting to more than she needed to. Davu's interest in Amari was corroborated by Jerome, who had no issues with Davu. Jerome stated that Davu specifically mentioned his romantic interest in Amari and also connected that interest with a job opportunity as a data collector. That was also consistent with Amari's story that Davu used the promise of a job to coerce her into a sexual relationship. Davu also lacked credibility in his reason for not renewing Amari's contract, as his boss planned for that extension. It is more plausible that Davu did not renew Amari's contract because there was suspicion about their relationship.

7. Determine whether established facts constitute a policy violation

The Country Director, in consultation with the investigators and the Safeguarding Unit, concluded that those established facts—that Davu promised Amari a job as a data collector if she had a sexual relationship with him—constituted a violation of the PSEA policy: No exchanges or offers to exchange jobs for a sexual relationship. Because Amira was a community member and otherwise a beneficiary, the PSEA policy addressed exchanges of jobs in the community for sex.

8. Determine appropriate disciplinary sanctions (if any)

The Country Director, in consultation with the investigators and the Safeguarding Unit, decided that because the PSEA policy states that sexual exploitation is gross misconduct, termination of employment was warranted for Davu.

9. Prepare investigation report with findings, conclusions and recommendations

After discussions by the investigators with the Country Director and the Safeguarding Unit about the factual findings in this case, the conclusion was made that the factual findings support the conclusion that Davu violated the PSEA policy, and that he should have his employment terminated for gross misconduct. The investigators finalized the written investigation report. The report detailed factual findings by the investigators, and recommended conclusions on policy violations and disciplinary sanctions.

During the investigation, the investigators also identified gaps in procedures and practices that could have contributed to circumstances that allowed the violation to occur. These included issues with the hiring process for data enumerators, awareness of SEA in the community, apartment compound visitation rules, and community reporting mechanisms.

10. Conclude investigation & implement corrective actions

The Country Director presented the Investigation Report to local counsel, prepared the termination of employee letter for Davu and followed the process required by local labor law.

The H.R. Manager updated local H.R. records and HQ databases about Davu's termination for a PSEA policy violation.

Amira was connected to further counseling sessions for support.

The Country Director worked with the Program Manager, H.R. Manager, M&E Manager and Security Manager on an implementation plan to make procedural changes to prevent additional incidents of SEA.

Handout Eight: Managing an Investigation – Steps in the Investigation Process

1. Receive an allegation

- Report is escalated to the person or team responsible for overseeing the investigation (for example, Safeguarding Unit, Ethics, Legal or H.R. at the senior level).
- Staff are reminded of the need for confidentiality.
- If there are any immediate health or safety concerns, they should be addressed on an emergency basis.

2. Assess and decide next steps

- The team responsible for overseeing the investigation reviews the allegation(s) along with the Senior Manager (if not implicated in the allegation), who becomes the "Investigations Manager." Teams may decide to appoint a small, trusted and confidential "Investigations Management Team" of two-three senior level managers.
- A determination is made if the allegations should be directly referred for investigation or if a preliminary assessment is necessary to understand the situation. If there is, take Step 3.

3. Take immediate action if necessary (safety, security, well-being)

- The safety and security needs of the survivor/witnesses are identified and resources are identified.
- Survivor is provided referral services, where needed and desired (medical, legal, psycho-social).
- Make a determination if national authorities should be notified if it involves criminal or reportable conduct. Adult survivors have the right to determine reporting to authorities, and organizations should assist a survivor who wishes to report. Review mandatory reporting laws and obligations when there are child survivors and parents do not want to report.
- The status of the Subject of Complaint (SoC) is decided (paid administrative leave, transfer, etc.) to ensure the safety of all concerned and protect the integrity of the investigation process.
- The risks to the investigation and other important considerations are identified and mitigation strategies established.

4. Create an Investigation Plan

- Investigator is identified. The Investigation Manager may appoint others to assist them.
- Investigator and Investigation Manager/Team prepare an investigation plan.
- A timeline is established on investigation activities and the overall timeline is communicated to affected parties

5. Gather evidence: review documents & conduct interviews

- Manager assists in obtaining access to documents and other evidence for the investigator.
- Documentation is secured to ensure integrity of the investigation.
- Other resources are identified such as local labor laws, and other legislation related to the case.
- Manager ensures staff to be interviewed understand their duty to cooperate with the investigation.
- Manager helps secure a confidential location for conducting witness interviews and locates an interpreter if needed.
- Investigator conducts interviews with the survivor, other witnesses, and the SoC.

6. Evaluate evidence, analyze and determine factual findings

- Investigator evaluates the evidence, both documents and statements of interviewees, to determine what events occurred, using a more likely than not standard.¹
- Investigator weighs evidence in favor of certain factual findings and weighs evidence against the factual findings. The investigator assesses the credibility of the evidence (using factors like corroboration, plausibility, motivation to lie, past record) to assist in weighing the evidence for and against the facts alleged to reach factual findings.
- Investigator's factual findings of the allegation(s) will indicate one of the following:
 - More likely than not, and by reasonable inference, identify which facts in the allegation did occur.
 - More likely than not, and by reasonable inference, identify which facts in the allegation did NOT occur.
 - In cases where there appears to be insufficient evidence, that weighs in favor of the facts being unsubstantiated, because there is not enough evidence to support.

7. Determine whether established facts constitute a policy violation

- **Conclusions on policy violations:**
 - **Substantiated:** More likely than not, and supported by factual findings, a violation of the policy has occurred.
 - **Unsubstantiated:** More likely than not, and supported by factual findings, a violation of the policy has NOT occurred.
 - In some cases, while the initial allegation was unsubstantiated, the evidence may support a finding that other Code of Conduct violations were substantiated.

8. Decide on appropriate disciplinary sanctions (if applicable)

- A decision is made on disciplinary actions if a violation of the Code of Conduct was substantiated.
- Remember that all violations of actual or attempted sexual exploitation and abuse are considered gross misconduct.

9. Prepare investigation report with findings, conclusions and recommendations

- The Investigator prepares a final investigation report that includes the factual findings reached by the Investigator. It will also include recommendations on whether the findings constitute a policy violation.
- Recommendations also include a Management Report outlining any instances of gaps in procedures or practices involving sexual exploitation and abuse.

10. Conclude investigation & implement corrective actions

- Investigation results are communicated as appropriate, including to survivors.
- Recommendations of corrective actions to prevent similar instances from happening in the future are implemented.
- Actions to protect the survivor and witnesses are taken, if necessary, such as when adverse employment actions are taken against the Subject of the Complaint.
- Support for the survivor continues as needed and requested. (that is, psycho-social support, medical, security.)
- If allegation(s) are unsubstantiated, training or monitoring may be recommended to enhance prevention or address any poor practices identified.

Handout Nine: Investigation Report Template

The following is a recommended template for the final investigation report along with guidelines for completion of the report.

The investigation report should:

- Observe the principles of good report writing (that is, be clear, concise, written in plain English and grammatically correct).
- Bear testimony to the key standards of an investigation
- Address evidence to support and refute the complaint (where such exists)
- Give a clear account of methodology (process) as well as findings (content)
- Evaluate evidence against specific stipulations of the code of conduct and other policy violations, rather than the investigator's own moral perspective
- Provide sufficient evidence to support conclusions and recommendations
- Be produced according to agreed-upon timeframes
- Separate fact from opinion
- Avoid emotional language

The format and content of the report should be as follows:

TITLE PAGE

- Name and title of investigator(s)
- Name (or case reference number) of subject(s)
- A statement to the effect that the report is confidential and is not to be copied or disclosed without due authorization
- Date

INTRODUCTION

- Name(s) or case reference number of subject(s) of complaint
- Confidentiality statement
- Brief contextual information (for example, the country, refugee camp, etc.)
- The factual nature of the allegation and which policies regarding sexual exploitation, abuse and harassment are alleged to have been breached
- The scope of the investigation (how many reporters, victims/survivors, witnesses, subjects, etc.)

EXECUTIVE SUMMARY

- Only necessary in longer and more complicated reports
- This should provide the reader with a very concise overview of the investigation: where the investigation was conducted; high level
- It should address succinctly how the investigation was conducted, as well as findings and recommendations. It should not contain any information which is not in the main body of the report.
- The executive summary should not be written until all other sections have been completed.

METHODOLOGY

- Describe the process used during the investigation to gather information (for example, location of interviews, those in attendance, translation support needed)
- Specific procedures or measures that were followed in accordance with the organization's policies (if relevant)
- Type of assistance provided and by which staff members or other agencies (if relevant)
- Type of witnesses interviewed (for example, refugees, the organization's own staff, other aid workers, etc.)
- Number of interviews
- Types of documents reviewed
- Type and location of any site visits (if relevant)

FACTUAL FINDINGS

- Summarize each allegation. If additional allegations surfaced during the course of the investigation, they should be added, explaining how they arose. If there are multiple allegations, take each one in turn.
- Include any new allegations discovered
- Include excerpts of applicable policies that may have been violated. It is also important to mention here the relevant procedures, protocols, etc., and to identify what is working, and what needs improvement for corrective measures.
- Describe the evidence in favor or and against each fact that is relevant to establishing a policy violation.
- Then explain why the evidence, when looked at together, supports a finding that a fact did or did not occur:
 - Describe other evidence - photos, work logs, emails, etc. in support of your analysis
 - Weigh the factors of motives to lie, logical inconsistencies, inherent plausibility, corroboration from other witnesses/evidence and past record when making this analysis and conclusion
 - Remember the standard for establishing the facts is "more likely than not", which means which story is more likely by a margin of 51%.
- Note any challenges in conducting the investigation (unavailable witnesses, documents, etc.)
- Draw logical and fair conclusions

Tips:

For each allegation, describe the main evidence that supports that finding. Identify other corroborating evidence in other witness statements or documents. Present any evidence, such as statements, to the contrary. Draw logical and fair findings based on the evidence. You can consider motives, logical inconsistencies, inherent plausibility, corroboration from other witnesses/evidence and past record. Remember, the standard for establishing the facts is “more likely than not,” which means which story is more likely by a margin of 51%.

Reports are much more manageable when broken down allegation by allegation rather than reciting all of one person’s story and then reciting the next person’s story.

CONCLUSIONS & RECOMMENDATIONS

This section should summarize the investigator(s) conclusions. Keep in mind, when you are conducting a workplace investigation, your determination of whether an allegation has merit has to be based upon the preponderance of the evidence. In other words, is it more likely than not that the incident occurred? The criminal law standard of “beyond a reasonable doubt” does not apply in employee misconduct investigations.

The conclusions are taking the factual findings-- that have also used a “more likely than not standard”-- to identify whether those facts constitute a policy violation and which one(s).

This section should state specifically the findings with respect to each allegation. The choices are **Substantiated or Unsubstantiated**.

1. Substantiated: It is more likely than not that the allegation is **true**.

2. Unsubstantiated: On balance of probabilities, it is more likely than not that the *allegations are not true*.

Disciplinary Sanctions:

In determining recommended disciplinary sanctions, consider the following:

Ensure compliance with applicable laws: Some laws require more proof than others before terminating an employee.

Handout Ten: HR Information and Investigation Outcome – World Without Poverty Case

World Without Poverty Study – Conclusion and Recommendation Analysis Exercise

Activity: After reviewing the outcome and other evidence from the Investigator below, what kind of corrective actions would you recommend?

Investigation Outcome:

The Investigator found from the document review and interviews that the following are more likely than not true:

- The subject of the complaint (SoC) violated the code of conduct.
- The Program Manager, Jamila by not reporting the rumor from the community member as stipulated in the code of conduct.
- The survivor's (Amari's) contract was terminated in violation of HR guidelines for extension of contracts.
- The SoC more likely than not sexually exploited the survivor
- The SoC had a habit of inviting enumerators to his apartment after hours
- The survivor has reported experiencing psychological trauma

Here is additional information that was learned in the investigation:

World Without Poverty's Protection From Sexual Exploitation, Abuse and Harassment (SEAH) Policy

- Policy prohibits all forms of SEAH
- Staff are required to report all suspected reports of SEAH, including rumors
- Staff/consultants/contractors in supervisory positions are required to disclose to HR any sexual or romantic relationships with staff reporting directly to them or in their supervisory authority so that reporting lines can be adjusted to avoid any potential conflicts of interest.
- All staff sign a statement indicating that they have received and understand the safeguarding policy
- All staff receive training on the safeguarding policy
- Staff must comply with PSEAH and Code of Conduct Policies even when they are not working
- Cash for work and temporary employees are not informed of the safeguarding policy by their supervisor on their first day of work. They do not sign anything.

Hiring practices for enumerators:

- No formal process, usually workers are hired based on referral
- The Project Supervisor does all of the hiring by him/herself
- No background checks are made on temporary workers
- Post a notice of the positions at community centers
- The Supervisor pays the workers in cash every week

Background check on subject of complaint:

Prior employment references received were from two colleagues who used to work with him. All were positive.

Module 2 - Post-Test – Safe Recruitment and Selection Participant Version

Thank you for completing this post-test. Your responses will help us improve future training programs, as well as assess how much knowledge you have acquired in attending this training. This information is confidential and for training assessment purposes only.

1. When thinking about safe recruitment and selection, name a possible warning sign on an employment application or resume.

2. Where would be the best starting point for reducing SEA risks in positions?

3. In the case of an emergency response, when candidates need to be hired quickly, it would be acceptable to forego the reference and background checks so people's lives can be saved. True or false? Circle the correct answer.

True

False

4. One strategy for lowering SEA risk is having gender balance in the workforce. Name two ways you could encourage more women candidates to apply.

5. The interviewing process itself can pose sexual exploitation risks to job candidates, especially for women, where an exchange of sexual favors is required to get the position. Name two ways women could be protected during the interviewing process.

Module 3 - Pre-Test – Managing an SEA Investigation Participant Form

Thank you for completing this pre-test. Your responses will help us improve future training programs, as well as assess how much knowledge you have acquired in attending this training. This information is confidential and for training assessment purposes only.

1. Name three tasks of an investigator.

2. Name three tasks of an investigation manager.

3. Name three risks to the investigation, that could affect the integrity of the investigation OR the people involved in the process.

4. Put in order the 10 steps of an Investigation (by putting the appropriate number in the blank space provided next to each step):

- ____ Determine if facts constitute policy violation
- ____ Take immediate action if necessary (safety, security, well-being)
- ____ Assess and identify next steps
- ____ Gather evidence and interview witnesses
- ____ Create an investigation plan
- ____ Conclude investigation
- ____ Evaluate evidence and make factual findings
- ____ Receive an allegation
- ____ Decide on disciplinary sanctions
- ____ Write investigation report

5. A matter is referred for investigation. Select the first three steps that should be taken as a priority:

- a. Contact the person who made the original report person to obtain as many details as possible on the allegations, names of witnesses, etc.
- b. Inform the subject of the complaint (SOC) that allegations have been made against him/her and that an investigation will be conducted.
- c. Interview the SOC to obtain his/her version of the facts.

- d. Immediately request the suspension of the SOC.
 - e. Assess whether there is a risk of evidence being destroyed or tampered with or threats to physical or psychological safety
 - f. Determine what rules may have been violated by the alleged conduct.
6. The safety and welfare of people who may have been victims of sexual abuse or exploitation includes (select all that apply):
- a. Safeguarding their physical safety
 - b. Compensation
 - c. Immediate health care, if necessary
 - d. Providing access to counseling services
 - e. Mandatory reporting to the national police authorities
7. Which is the most important step of a good SEA investigation?
- a. A good, well-prepared investigation plan
 - b. Interview note templates
 - c. Final investigation report
 - d. Conclusions about a policy violation beyond a reasonable doubt
 - e. Terminating an employee's contract for gross misconduct
8. Explain the differences between factual findings, conclusions and recommendations in a report.
-
-
-
-
9. Name at least three factors to weigh when considering disciplinary sanctions for substantiated violations of SEA.
-
-
-
-
10. Name three possible considerations when identifying corrective measures to prevent future incidents of SEA.
-
-
-
-

Module 3 – Managing an SEA Investigation

Facilitator Answer Key

1. Name three tasks of an investigator.

(6 Points Total: 2 points for each correct answer)

- Develop a written plan of investigation
- Recommendations on whether the subject of the complaint (SoC) should be suspended with pay during the investigation
- Assess/review and advise on matters pertaining to the needs of the survivor/victim and other witnesses
- Interview witnesses
- Gathering and analyze evidence, making recommendations
- Produce findings
- Write investigation report
- Make recommendations

(Any answer that conveys three of these main concepts is acceptable)

2. Name three tasks of an investigation manager.

(6 Points Total: 2 points for each correct answer)

- Receive and handle the SEA and SH complaints that come to them directly to them or through other reporting mechanisms
- Assist in investigation planning and risk assessment
- Facilitate the implementation of plans to meet the needs of the survivor(s) and/or complainant, specifying their need for protection, including possible relocation and any health/medical and psycho-social needs
- Decide who needs to know and briefing those individuals (such as a supervisor in the event of an alleged perpetrator's suspension or transfer)
- Check personnel records to establish any prior complaints/investigations against a specific individual
- Decide whether to suspend or redeploy the alleged perpetrator during the investigation
- Complete a Terms of Reference
- Review recommendations on outcomes
- Decide who needs to know and briefing those individuals (such as a supervisor in the event of an alleged perpetrator's suspension or transfer)
- Ensure staff cooperation, find a facility for private interviews.
- Find interpreters
- Inform organizations if they are implicated in the allegations

(Any answer that conveys three of these main concepts is acceptable)

3. Name three risks to the investigation, that could affect the integrity of the investigation OR the people involved in the process.

(6 Points Total: 2 points for each correct answer)

- Destruction of documents or altering evidence
- Delays that impact collection of evidence or ability to finalize process in timely manner
- Lack of cooperation
- Fear of retaliation at work or out in the community
- Collusion between witnesses
- Intimidating witnesses
- Media concerns
- Not following local labor laws
- Safety and security concerns for:
 - Victims/survivors Reporters
 - Witnesses Staff suspected of wrongdoing
 - Other staff

(Any answer that conveys three of these main concepts is acceptable)

4. Put in order the 10 steps of an Investigation (by putting the appropriate number in the blank space provided next to each step):

(10 Points Total: 5 points partial credit for some correct order, 10 points for fully correct order)

- | | |
|----|---|
| 7 | Determine if facts constitute policy violation |
| 3 | Take immediate action if necessary (safety, security, well-being) |
| 2 | Assess and identify next steps |
| 5 | Gather evidence and interview witnesses |
| 4 | Create an investigation plan |
| 10 | Conclude investigation |
| 6 | Evaluate evidence and make factual findings |
| 1 | Receive an allegation |
| 8 | Decide on disciplinary sanctions |
| 9 | Write investigation report |

5. A matter is referred for investigation. Select the first three steps that should be taken as a priority:

(6 Points Total: 2 points for each correct answer)

- a. Contact the person who made the original report person to obtain as many details as possible on the allegations, names of witnesses, etc.
- b. Inform the subject of the complaint (SOC) that allegations have been made against him/her and that an investigation will be conducted.
- c. Interview the SOC to obtain his/her version of the facts.
- d. Immediately request the suspension of the SOC.

- e. Assess whether there is a risk of evidence being destroyed or tampered with or threats to physical or psychological safety
- f. Determine what rules may have been violated by the alleged conduct.

6. The safety and welfare of people who may have been victims of sexual abuse or exploitation includes (select all that apply):

(6 Points Total: 2 points for each correct answer)

- a. Safeguarding their physical safety
- b. Compensation
- c. Immediate health care, if necessary
- d. Providing access to counseling services
- e. Mandatory reporting to the national police authorities

7. Which is the most important step of a good SEA investigation?

(6 points for the correct answer)

- a. A good, well-prepared investigation plan
- b. Interview note templates
- c. Final investigation report
- d. Conclusions about a policy violation beyond a reasonable doubt
- e. Terminating an employee's contract for gross misconduct

8. Explain the differences between factual findings, conclusions and recommendations in a report.

(12 points Total: 4 points for each correct answer)

Factual findings: The main part of the investigation to gather evidence and to determine what the facts are. Factual findings are establishing what happened, by drawing logical and fair findings, based on the evidence. The facts are found by reasonable inference, by what is more likely than not to have occurred. These are generally determined by the investigation team.

Conclusions: Conclusions are taking the facts to decide whether there has been a policy or code of conduct violation. These are generally taken by the response team, although the investigation team can make recommendations. Conclusions are Substantiated and Unsubstantiated.

Recommendations: These are recommendations by the investigation team on conclusions, disciplinary sanctions and corrective measures. Disciplinary sanctions are recommendations based on substantiated conduct. While taken by the investigation management team, the investigation team can make recommendations. Another piece is recommending corrective measures: what are steps around trainings, procedures and processes that can prevent future occurrences of such behavior.

9. Name at least three factors to weigh when considering disciplinary sanctions for substantiated violations of SEA.

(6 Points Total: 2 points for each correct answer)

- Seriousness of the misconduct (exploitation, violence, extreme harassment)
- Prior misconduct
- Frequency of misconduct
- Position of suspect: the higher the position, the greater the obligation to treat people with respect and dignity
- Internal procedures and practices
- Ability to accept responsibility and reform versus continued denial

10. Name three possible considerations when identifying corrective measures to prevent future incidents of SEA.

(6 Points Total: 2 points for each correct answer)

- How to change/modify some program practices to prevent sexual exploitation, abuse and harassment
- Where additional training might be needed
- Policy changes
- Supervision concerns
- How to protect witnesses if adverse employment actions are taken against the subject of complaint
- Awareness sessions with beneficiaries and communities on their rights and responsibilities, including how to report concerns about programs or staff
- Strengthening Feedback and Response Mechanisms in communities
- Strengthening internal reporting systems on staff misconduct
- Recruit more female staff in the field and to positions of authority
- Adjust procedures and protocols to ensure staff are not alone with beneficiaries of opposite sex
- Reinforce trainings for managers for red-flag behaviors that they should stop before it escalates

(Any answer that conveys three of these main concepts is acceptable)

Module 3 - Post-Test – Managing an SEA Intervention Participant Form

Thank you for completing this post-test. Your responses will help us improve future training programs, as well as assess how much knowledge you have acquired in attending this training. This information is confidential and for training assessment purposes only.

1. Name three tasks of an investigator.

2. Name three tasks of an investigation manager.

3. Name three risks to the investigation, that could affect the integrity of the investigation OR the people involved in the process.

4. Put in order the 10 steps of an Investigation (by putting the appropriate number in the blank space provided next to each step):

____ Determine if facts constitute policy violation
____ Take immediate action if necessary (safety, security, well-being)
____ Assess and identify next steps
____ Gather evidence and interview witnesses
____ Create an investigation plan
____ Conclude investigation
____ Evaluate evidence and make factual findings
____ Receive an allegation
____ Decide on disciplinary sanctions
____ Write investigation report

5. A matter is referred for investigation. Select the first three steps that should be taken as a priority:

- a. Contact the person who made the original report person to obtain as many details as possible on the allegations, names of witnesses, etc.

- b. Inform the subject of the complaint (SOC) that allegations have been made against him/her and that an investigation will be conducted.
 - c. Interview the SOC to obtain his/her version of the facts.
 - d. Immediately request the suspension of the SOC.
 - e. Assess whether there is a risk of evidence being destroyed or tampered with or threats to physical or psychological safety
 - f. Determine what rules may have been violated by the alleged conduct.
6. The safety and welfare of people who may have been victims of sexual abuse or exploitation includes (select all that apply):
- a. Safeguarding their physical safety
 - b. Compensation
 - c. Immediate health care, if necessary
 - d. Providing access to counseling services
 - e. Mandatory reporting to the national police authorities
7. Which is the most important step of a good SEA investigation?
- a. A good, well-prepared investigation plan
 - b. Interview note templates
 - c. Final investigation report
 - d. Conclusions about a policy violation beyond a reasonable doubt
 - e. Terminating an employee's contract for gross misconduct
8. Explain the differences between factual findings, conclusions and recommendations in a report.
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9. Name at least three factors to weigh when considering disciplinary sanctions for substantiated violations of SEA.
-
-
-
-
10. Name three possible considerations when identifying corrective measures to prevent future incidents of SEA.
-
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-
-

Outcome Evaluation – Managing an SEA Investigation

This section helps us evaluate how effective the training was in teaching participants the desired material. We would like for you to rate your knowledge, skills, and confidence before and after the training in the areas listed below.

Please select the most appropriate response and circle or highlight your answer. If you missed the session that covered a particular topic, please select “Did Not Attend.”

1. How would you rate your knowledge, skills and confidence on the topic of the role of the Investigation Manager in the Investigation Process?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

2. How would you rate your knowledge, skills and confidence on the topic of the SEA Investigator’s role?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

3. How would you rate your knowledge, skills and confidence on the topic of the Investigations Manager’s role in supporting the SEA investigator?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

4. How would you rate your knowledge, skills and confidence on the topic of the key investigation principles?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

5. How would you rate your knowledge, skills and confidence on the topic of identifying risk in handling SEA allegations?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

6. How would you rate your knowledge, skills and confidence on the topic of minimizing risks in an SEA investigation?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

7. How would you rate your knowledge, skills and confidence on the topic of survivor support?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

8. How would you rate your knowledge, skills and confidence on the topic of the 10 steps in an investigation process?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

9. How would you rate your knowledge, skills and confidence on the topic of corrective measures to prevent SEA based on investigation findings and recommendations?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

10. How would you rate your knowledge, skills and confidence on the topic of the Investigation Manager's role in concluding an SEA investigation?

Before Training	Poor	Fair	Good	Excellent	Did Not Attend
After Training	Poor	Fair	Good	Excellent	Did Not Attend

Training Evaluation – Managing an SEA Investigation

This section helps us understand how future workshops may need to be adjusted to best respond to participants' needs. Please circle the number that best describes your experience.

The training content was relevant.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

The training content was comprehensive.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

The training content was easy to understand.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

Workshop handouts supported presentation material.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

Training handouts provided useful additional information.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

Training handouts were clear and well-organized.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

The training was well-paced.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

The training was a good mix of listening and group activities.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

The group activities were useful learning experiences.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

The facilitator was knowledgeable.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

The facilitator was responsive to participants' questions.

Strongly Disagree 1 2 3 4 5 **Strongly Agree**

What did you like best about this workshop?

Do you have any specific recommendations for improving this course?

What further training or support would you like to have?

Additional Comments:
