PSEA IMPLEMENTATION QUICK REFERENCE HANDBOOK

CHSAlliance

AUTHORS

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GLOSSARY

Allegation – an assertion of facts that one intends to prove at trial or during an internal investigation procedure.

Beneficiary – someone in receipt of assistance. Alternatively referred to as a member of the affected population, person we seek to assist, person affected by crisis or rights holders.

Case management – following the appropriate policies and procedures to determine the outcome of a report of SEA.

Child – any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Child protection – preventing and responding to violence, exploitation and abuse against children – including [but not limited to] commercial sexual exploitation, trafficking, child labour and harmful traditional practices[1].

Code of conduct – a set of standards about behaviour that staff of an organisation are obliged to adhere to.

Complaint – specific grievance of anyone who has been negatively affected by an organisation's action or who believes that an organisation has failed to meet a stated commitment.

Complainant – the person making the complaint, including the alleged survivor of the sexual exploitation and abuse or another person who becomes aware of the wrongdoing.

Complaint mechanism or procedure – processes that allow individuals to report concerns such as breaches of organisational policies or codes of conduct. Elements of a complaints mechanism may include suggestion boxes, whistleblowing policies and designated focal points.

Confidentiality – an ethical principle that restricts access to and dissemination of information. In investigations on sexual exploitation, abuse, fraud and corruption, it requires that information is available only to a limited number of authorised people for the purpose of concluding the investigation. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events and builds trust in the system and in the organisation.

Feedback – the information sent to an entity (individual or a group) about its prior behaviour so that the entity may adjust its current and future behaviour to achieve the desired result.

Focal point – a person designated to receive complaints of cases of sexual exploitation and abuse.

Investigation of sexual exploitation or abuse – an internal administrative procedure, in which an organisation attempts to establish whether there has been a breach of SEA policy by a staff member or members.

PSEA (Protection from sexual Exploitation and Abuse) – the term used by the UN and NGO community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by their own staff and associated personnel.

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[1] UNICEF *Child Protection Information Sheet What is Child Protection?*

Report – where an individual or individuals report a concern regarding SEA.

Safeguarding – the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children and vulnerable adults, and that they do not expose them to the risk of harm and abuse[2]. PSEA and child protection come under this umbrella term. Generally the term does not include sexual harassment of staff by staff, which is usually covered by organisation's bullying and harassment policy.

Sexual abuse – an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation – any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Survivor or victim – the person who is, or has been, sexually exploited or abused. The term 'survivor' implies strength, resilience and the capacity to survive. This document mostly uses the term 'victim', to mean the victim of the alleged perpetrator's actions. However this is not intended to negate that person's dignity and agency as an individual.

Whistleblowing policy – an organisational policy which encourages staff members to report concerns or suspicions of misconduct by colleagues. Whistleblowers are protected from any negative consequences of reporting these concerns.

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[2] Adapted from Keeping Children Safe *www.keepingchildrensafe.org.uk*

[3] United Nations Secretariat, 9 October 2003, *Secretary General's Bulletin on Special Measures for Protection from Sexual Abuse and Sexual Exploitation, 2003/13 (ST/SGB/2003/13)*, United Nations.

[4] ibid

CONTENTS

INTRODUCTION

Background

PSEA (Protection from Sexual Exploitation and Abuse) is a term used by the UN and NGO community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse our by own staff and associated personnel.

The contexts we work in bring us into contact with vulnerable people. As NGO workers, we have access to goods and services that put us in a position of power over the community. Unfortunately, a minority of people use this imbalance of power to exploit and abuse vulnerable members of the community.

The humanitarian and development community is committed to preventing sexual exploitation and abuse in our work. However the issue is a complex one and sometimes it can seem hard to know where to start.

International standards on PSEA

The most widely used standards with regard to PSEA are the IASC (Inter-Agency Standing Committee) Minimum Operating Standards for Protection from Sexual Exploitation and Abuse for UN and non-UN staff. The eight areas covered by the Minimum Operating Standards are:

Minimum Operating Standard	Chapter in PSEA Handbook
1. Effective policy development and implementation	*Developing and implementing PSEA policy and procedures*
2. Cooperative arrangements	*Implementing PSEA requirements with partners, suppliers and contractors*
3. A dedicated department/focal point is committed to PSEA	*Assigning specific responsibilities for PSEA*
4. Effective and comprehensive communication from headquarters to the field on expectations regarding raising beneficiary awareness on PSEA	*Engaging communities and people affected by crisis*
5. Effective community based complaints mechanisms, including victim assistance.	*Developing and implementing a comprehensive complaints mechanism*
6. Effective recruitment and performance management	*Developing and implementing PSEA policy and procedures* *Ensuring staff, volunteers and associates understand and work to PSEA requirements*
7. Effective and comprehensive mechanisms are established to ensure awareness-raising on SEA amongst personnel	*Ensuring staff, volunteers and associates understand and work to PSEA requirements*
8. Internal complaints and investigation procedures in place	*Responding to reports of SEA*

PSEA is also mainstreamed in the **Core Humanitarian Standard**. It is particularly referenced in the following Key Actions and Organisational Responsibilities:

Key Action 3.6: Identify and act upon potential or actual unwanted negative effects in a timely and systematic manner, including areas of … sexual exploitation and abuse by staff.

Organisational Responsibility 5.6: Communities and people affected by crisis are fully aware of the expected behaviour of humanitarian staff, including organisational commitments made on the prevention of sexual exploitation and abuse.

Organisational Responsibility 8.7: A code of conduct is in place that establishes, at a minimum, the obligation of staff not to exploit, abuse or otherwise discriminate against people.

Other than these specific references, other elements of the CHS also contribute to PSEA:

Commitment	Key Actions or Organisational Responsibilities	Contribution to PSEA
Communities and people affected by crisis receive assistance appropriate to their needs.	Design and implement appropriate programmes based on an impartial assessment of needs and risks, and an understanding of the vulnerabilities and capacities of different groups.	Safe programming – minimising the opportunities for SEA in communities and by humanitarian staff
Communities and people affected by crisis have access to the humanitarian assistance they need at the right time.	Design programmes that address constraints so that the proposed action is realistic and safe for communities.	Safe programming – ensuring the programme Do(es) No Harm
Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.	Provide information to communities and people affected by crisis about the organisation, the principles it adheres to, how it expects its staff to behave, the programmes it is implementing and what they intend to deliver. Policies for information-sharing are in place, and promote a culture of open communication.	Engaging communities and beneficiaries on PSEA so they understand PSEA commitments and build confidence in communicating with the organisation on PSEA and particularly making a report
Communities and people affected by crisis can expect that the organisations assisting them are managing resources effectively, efficiently and ethically.	Manage the risk of corruption and take appropriate action if it is identified. Policies and processes governing the use and management of resources are in place.	Ensuring staff and volunteers understand and work to PSEA requirements – corruption and misuse of resources may be linked to SEA e.g. resources are withheld or used specifically to sexually exploit beneficiaries

Purpose of the handbook

The purpose of this handbook is to demonstrate how we can implement practical measures to prevent sexual exploitation and abuse. The Handbook takes the key areas from the above standards and provides examples of how this can look in practice. It also provides a real-life case study for each of the areas covered, so you can learn from the work of other NGOs.

How to use this handbook

This handbook is designed for you to dip into when you are developing PSEA measures, to provide guidance and ideas. Each chapter takes a key element in implementing PSEA, and discusses what needs to be in place. It then takes you through a step by step guide of how to implement these measures, followed by a good practice example.

Further support

Tools and resources that support you to implement the steps in each chapter can be found on the CHS Alliance website at http://www.chsalliance.org/what-we-do/psea/psea-handbook.

If you are interested in understanding better how well you are implementing PSEA measures, the CHS Alliance can advise on approaches to organisational assessment. CHS Alliance members are required to carry out a self-assessment against the Core Humanitarian Standard every two years, and to report progress annually against an action plan derived from the findings. The CHS Alliance extracts a detailed PSEA score from the self-assessments and progress reports, giving a comprehensive picture of the different elements contributing to effective work on PSEA in an organisation. The score is fed back to the individual organisations, as well as providing a way of tracking progress on PSEA across the sector. Organisations with gaps on this can access free, unlimited remote support from the CHS Alliance as they work to improve.

PSEA HANDBOOK AT A GLANCE

PSEA policy and procedures	• A PSEA policy describes standard of behaviour for organisation's staff and representatives, specifically forbidding sexual exploitation and abuse • Procedures which describe how the policy is implemented throughout the organisation • An implementation plan for PSEA which is reviewed and updated regularly
Assigning specific responsibilities for PSEA	• Senior management takes responsibility for ensuring PSEA measures are implemented • Organisations assign focal points for PSEA • PSEA responsibilities are reflected in role and job descriptions
Ensuring staff, volunteers and associates meet PSEA requirements	• All sign the organisation's code of conduct which includes PSEA • All receive induction and (where relevant) annual refresher training on PSEA • Staff aware of their obligation to report SEA/misconduct and are protected from retaliation • Supervision and performance appraisals include adherence to code of conduct and participation in PSEA trainings
Engaging communities and beneficiaries on PSEA	• Communities fully aware of the expected behaviour of the organisation's staff • Communities know how to complain if these commitments are not met • Appropriate awareness - raising tools and approaches are used with communities
Implementing PSEA requirements with partners, suppliers and contractors	• Partners, suppliers and contractors are assessed for contact with beneficiaries, and capacity to implement PSEA measures • Clauses on PSEA are included in all contract agreements • PSEA training is delivered to partners, suppliers and contractors • PSEA measures, and SEA cases, in partner, supplier and contractor organisations are monitored
Designing safe programmes and projects	• Potential risks of sexual exploitation and abuse presented by programmes are identified and addressed • Project plans include activities on PSEA awareness and sensitivity • Budgets include funding lines for capacity building and communications on PSEA
Developing and implementing a comprehensive complaints mechanism	• A documented complaints handling process for communities and people affected by crisis • An organisational culture in which complaints are taken seriously and acted upon • Communities are made aware of what behaviour they can expect from organisation staff • Complaints channels that are designed to proactively enable reports of SEA • A fast-track process for dealing with complaints about SEA • A referral process for complaints which do not fall within the scope of your organisation's policy
Responding to reports of SEA	• Written procedures on responding to reports or concerns relating to SEA • Investigations are undertaken in line with the relevant standards and guidance • Investigations are undertaken by experienced and qualified professionals • Substantiated complaints result in either disciplinary action or contractual consequences

DEVELOPING AND IMPLEMENTING PSEA POLICY AND PROCEDURES

What should be in place

- A PSEA, or similar, policy which describes the standard of behaviour expected of the organisation's staff and representatives, and which specifically forbids sexual exploitation and abuse.

- Procedures which describe how the policy is implemented throughout the organisation.

- An implementation plan, identifying gaps in implementing PSEA and actions to address the gaps, which is reviewed and updated regularly.

How to do it

1. Develop a PSEA policy. You can develop your policy by:

   - Running a consultation with staff, raising awareness on what PSEA means and asking for their inputs on what the policy should say; or

   - Using an example of a PSEA policy from elsewhere and adapt to suit your organisation and the context in which you work. You should involve staff by circulating the draft and asking for comment before finalising.

2. If you are working with children and plan on developing a child safeguarding policy to prevent harm to children, you can develop one policy that covers PSEA and child safeguarding – but make sure that your policy covers SEA of both adults and children.

3. Check your PSEA policy:

   - Identifies the organisation's commitment to the Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).

   - Recognises the rights of all beneficiaries to be protected from sexual exploitation and abuse.

   - Applies to all staff, volunteers and associates at all times.

   - Identifies and manages risk.

   - Includes the organisation's Code of Conduct.

   - Integrates PSEA measures into all areas of the organization.

4. Develop PSEA procedures, or refer to relevant organisational procedures/ guidelines which include PSEA measures. The procedures should include:

Procedure	PSEA measures
Recruitment	• Job adverts include PSEA commitments • Gaps in employment history checked during interview • Questions related to PSEA asked during interview • At least two references taken from previous employers which include questions on candidate's conduct, behaviour • Criminal records check is conducted, where possible • New employees sign contracts which include PSEA and the organisation's code of conduct
Induction/training	• Induction includes at least a briefing on PSEA • All staff receive a half day training on PSEA – recognising and responding to risks and concerns • Annual refresher training opportunities provided
Performance management	• Performance management discussions include understanding of PSEA and an opportunity to raise concerns • Where performance management includes working to values or competencies, these include PSEA
Whistleblowing	• A policy or procedure which encourages people to report on concerns without fear of reprisals
Discipline and grievance	• SEA is explicitly stated as grounds for discipline which may result in termination
Programming guidelines	• Programming guidelines include identifying and mitigating risks in programmes to make them safer
Partnership arrangements	• All contracts with partners/suppliers/contractors include clauses on PSEA • Capacity building for partners includes capacity to implement PSEA measures • Partner monitoring includes PSEA measures and SEA reports
Complaints/ reporting	• Complaints mechanism developed to receive and respond to reports of SEA

5. Develop a PSEA implementation or work plan which identifies the gaps in the organisation in implementing PSEA measures, and states what action will be taken to address the gaps, by whom and when.

6. Monitor the implementation plan on a quarterly basis to ensure that the organisation is making steady progress towards fully implementing PSEA policy and procedures.

7. Review the PSEA policy and procedures every two years to ensure they are fit for purpose.

Developing and implementing an anti-harassment policy in India

The programme

EFICOR is a national organisation engaged in development, advocacy, disaster response and training. EFICOR support some 38 projects across India, focusing primarily on disaster management, climate change, health and urban poverty. They work with a range of communities and people including those with disabilities. Their staff are spread across the projects, with a number of them based in fairly remote communities.

Information on how to make a complaint relating to the policy

The issue

EFICOR had been working with a child protection policy and a gender policy. In 2010 the Supreme Court in India issued a recommendation that organisations introduce anti-harassment policies and procedures. EFICOR took this opportunity to introduce a new anti-harassment policy, which replaced their gender policy, to cover sexual harassment, abuse and exploitation both within and outside the workplace.

What EFICOR did

EFICOR adopted a consultative process in developing the policy. The initial draft of the policy was developed by EFICOR's Planning, Action, Coordination Team (PACT) during their annual meeting and agreed by the Board of Trustees. EFICOR used a policy from another organisation to help inform the draft. All staff were then consulted on this draft; discussions focused on potential challenges in implementing the policy and other concerns staff had. The results of this consultation were used to produce a final draft of the policy which was signed off by the Board. The policy is accompanied by a set of procedures which describes what needs to be done for recruitment, induction/training, reporting concerns and disciplinary actions relating to sexual harassment. All staff were required to sign the policy upon its introduction during their annual staff retreat. The process of developing, consulting and signing off the policy took a year and a half.

Key procedures that EFICOR have implemented to support the policy are:

- **Recruitment** – EFICOR ask candidates to complete application forms and declare they are free from convictions relating to abuse of children. Candidates are asked about any gaps in their employment history during the interview. They are required to provide two references; EFICOR also contacts the previous employer to check whether there are concerns over the candidate's behaviour. Background checks are done on successful candidates.

- **Induction/training** – all new employees receive a briefing on the policy and are asked to sign it. Staff have the opportunity to discuss the values they work to during the annual staff retreat.

- **Performance appraisal** – this triggers a renewal of contract which is accompanied by a letter reminding staff of the policies they must work to.

Information on the anti-harassment policy being delivered during a maternal health project

What happened as a result

EFICOR's leadership has been instrumental in developing and implementing the policy and models the behaviour expected of staff. The Board monitor the progress in implementing the policy.

Due to the process of developing the policy, and the reminders and discussions that take place each year, staff understand the policy well and "hold one another accountable". The policy is going to be translated into local languages to ensure all stakeholders fully understand.

Lessons learnt

- Check what national legislation or policy exists that supports PSEA, anti-harassment etc. and use this as a foundation for your organisation's policy and measures.

- The Board of Trustees plays a vital role in leading the development and implementation of the policy. Having Board members who have a good understanding of the issue and/or the legal implications of not having a policy is particularly useful.

- If using a policy from another organisation, it must be adapted to suit the context and organisation. Cultural practices with regard to issues such as child care need to be well understood.

- Always consult staff in the development of the policy – it creates ownership, buy-in and awareness.

- There needs to be a balance between focusing on SEA for women and SEA for men – it is not just an issue which impacts on women.

- Larger, more well resourced, organisations may be able to implement a policy within existing funding. Smaller organisations may need support and some additional funding may be required.

ASSIGNING SPECIFIC RESPONSIBILITIES FOR PSEA

What should be in place

• Senior management takes responsibility for ensuring PSEA measures are implemented.

• Organisations assign focal points for PSEA, who coordinate the development and implementation of PSEA policy and procedures.

• PSEA responsibilities are reflected in role and job descriptions.

How to do it

1. At least once every three months, include an item on PSEA on your Senior Management Team meeting agenda. Discuss progress and challenges with implementing the PSEA policy and implementation plan.

2. Present a progress report on implementing the PSEA policy to your Board at least once a year.

3. Identify staff members who can serve as focal points on PSEA. These staff members should be relatively senior and/or hold roles which already implement PSEA measures, such as human resources staff.

4. Be clear on the role the focal points will play. The role will need to include:

   • Awareness raising/training for staff, stakeholders and communities

   • Documenting who has signed the PSEA policy and code of conduct and who has received training on PSEA

   • Receiving reports on PSEA and coordinating the response

5. Identify PSEA responsibilities for other staff. These are typically:

Role	Responsibility
All staff	• Adhere to the PSEA policy and code of conduct, report concerns.
All Managers	• Ensure all new employees receive the PSEA policy training as part of their induction. • Ensure PSEA measures are implemented within their area of responsibility. • Follow up, and address, SEA issues appropriately.
HR staff	• Implement the necessary measures when recruiting new staff and volunteers. • Ensure all new employees receive a copy of the PSEA policy and code of conduct, prior to, or at the time of, issuing an employment contract. Signed copies must be place in their personnel file.
Programme staff	• Ensure that communities are aware of the PSEA Policy and how to report concerns.

6. Write PSEA responsibilities into job descriptions and include it in performance management/appraisal discussions.

Good practice example

Assigning responsibilities for PSEA in a refugee programme in Kenya

The programme

The Refugee Consortium of Kenya (RCK) promotes and protects the rights and dignity of refugees, asylum seekers, internally displaced people and other forced migrants in Kenya and the wider East African region. The organisation was established in response to an increasingly complex and deteriorating refugee situation in Kenya and the region.
RCK provides legal aid services and psychosocial counseling; advocates for policy change and raises awareness on the rights of refugees. The organisation works in Nairobi and urban centres and in camps hosting refugees.

Workshop on PSEA code of conduct

The issue

RCK had introduced some PSEA measures in 2004. In 2010 RCK began work with UNHCR and, as a requirement of the partnership, had to include PSEA commitments in all contracts and demonstrate that the organisation was actively implementing PSEA measures across the organisation. RCK needed key people within the organisation to support PSEA implementation.

What RCK did

RCK decided to assign focal point responsibilities to key staff in the organisation.

The national focal point role was assigned to the HR/admin officer in Nairobi. RCK recognised that the HR/admin officer is an important role for PSEA. The HR/admin officer had the necessary authority to recommend or take decisions in relation to staff, and she was able to work professionally, be objective and manage information confidentially.

RCK also recognised, however, that this role did not have contact with the refugee communities where abuse might be taking place. They needed to assign focal point roles to project managers who worked in the camps and the urban communities in which RCK operated.

The focal points have been given a number of responsibilities for PSEA. The HR/admin officer is responsible for:

- Delivering induction/training to staff on PSEA.
- Reporting concerns or issues with PSEA implementation to the Senior Management Team.
- Receiving reports and coordinating the response to any reports that arise.

The project managers are responsible for:

- Holding monthly staff meetings during which they discuss PSEA.
- Holding quarterly meetings with refugees during which they discuss PSEA.
- Receiving reports from refugees.

The senior management team hold a monthly review of concerns or issues that have arisen with PSEA implementation, and report as necessary to their Board of Trustees.

Key staff have received introductory training on PSEA and participated in events on investigations.
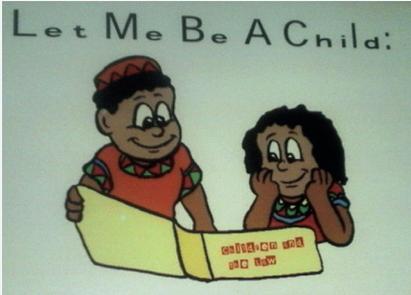
Excerpt from booklet produced by RCK to support monthly discussions with children on SEA

What happened as a result

RCK have been able to demonstrate that PSEA measures are being implemented throughout the organisation. All staff are trained and have the opportunity to discuss PSEA on a regular basis so awareness on PSEA and code of conduct is high. Coordination on PSEA across the organisation is strong - particularly between the focal points. Lines of reporting are very clear, refugees know who has responsibility for receiving and responding to reports and the team can manage issues professionally.

RCK has also been able to identify where their gaps may be. For example, they are exploring different avenues for encouraging reports on PSEA to build refugee confidence in reporting. Further training will be needed for key staff to manage cases and conduct investigations.

Lessons learnt

- Need to commit to being accountable on PSEA – having funds to implement PSEA measures is not enough.
- Include a proportion of costs for implementing PSEA measures in all project proposals.
- Ensure job descriptions reflect responsibilities, and that time is allocated for PSEA work.
- Make sure focal points have a good relationship with the communities you are supporting – it is difficult for people to report if they do not know the focal point, or if they do not trust them.

ENSURING STAFF, VOLUNTEERS AND ASSOCIATES UNDERSTAND AND WORK TO PSEA REQUIREMENTS

What should be in place

- All staff, volunteers and associated personnel sign the organisation's code of conduct, or equivalent, which includes PSEA.

- All staff, volunteers and associates receive induction and (where relevant) annual refresher training on PSEA.

- Staff members are aware of their obligation to report SEA/misconduct and are aware that there is a policy for protection from retaliation (often called a whistleblower policy') in place.

- Supervision and performance appraisals include adherence to code of conduct and participation in trainings (or similar) that include PSEA.

How to do it

1. All staff, volunteers, and associated personnel should sign a copy of the organisation's Code of Conduct (or equivalent) when joining the organisation. This can be annexed to their contract. Note that, as an organisational policy, the Code of Conduct still applies even to staff who have for any reasons not signed it.

2. Contractors, suppliers and other personnel associated with the organisation should also be made aware of the code of conduct. See the chapter on Implementing PSEA requirements with partners, suppliers and contractors.

3. Staff should be briefed on their obligations in terms of PSEA when joining the organisation. It is not enough just to sign the code of conduct – they need to be made aware of its contents. Inductions should include

   - What is expected of them in terms of their conduct.

   - What are the implications of breaching the code of conduct.

   - How to report any concerns they might have regarding SEA.

4. Regular refresher training should be held on PSEA, covering the above points.

5. Awareness raising materials can also be used to remind staff of the code of conduct. These could be in the form of posters or leaflets displayed in the office and distributed to staff.

6. Procedures such as performance review, annual appraisal and so on could include a section on adherence to the code of conduct, and participation in training.

7. Staff should be performance managed on whether they are implementing their role and responsibility for PSEA effectively *(see the chapter on Assigning specific responsibilities for PSEA).*

8. Senior managers should be performance-managed on whether they are creating an environment to help prevent sexual exploitation and abuse – for example ensuring that inductions and training are taking place, communicating to staff that they will take any complaint or concerns seriously, and following up any SEA issues appropriately and according to the organisation's procedures.

Communicating principles and values to YEU staff in Indonesia

The programme

YEU is the Emergency Unit of YAKKUM - the Christian Foundation for Public Health, based in Indonesia. YEU provides humanitarian assistance across Indonesia and the East Asia region.

The issue

YEU has an organisational code of conduct, which covers issues of PSEA. The code of conduct has been part of all staff contracts since 2011. However, the challenge was to raise staff awareness on PSEA, so it became a 'living' part of their work – not just something that they signed with their contract, then forgot about.

What YEU did

YEU set up a series of procedures to ensure that PSEA became part of regular management processes. This includes:

• Inductions on the organisation's principles and code of conduct, which includes PSEA.

• Quarterly management meetings to address pressing issues of PSEA, review PSEA policy, etc.

• Annual all-staff meetings in order to refresh staff on organisational values and norms, including PSEA – and share experience of dealing with PSEA issues from the field.

• Displaying agreements with communities on the walls of field offices, which include code Of conduct and remind staff of the specific behaviour that is expected of them.


YEU public health programme in Mentawari Island

- Implementing 360° feedback for staff performance (where both managers and subordinates can feed back on staff performance), which includes breaches of the code of conduct.
- Including PSEA in other associated policies, such as the communication policy, the information disclosure policy etc – so it is visible across the organisation.

What happened as a result

YEU report that the results have been very positive – staff are more aware of PSEA issues as a result of rolling out these procedures.

In addition, working on PSEA has been helpful for acceptance in the community. YEU are a Christian organisation working in a majority Muslim country. Introducing PSEA has shown the community that YEU are really thinking about how they can work together respectfully, and has helped to develop trust.
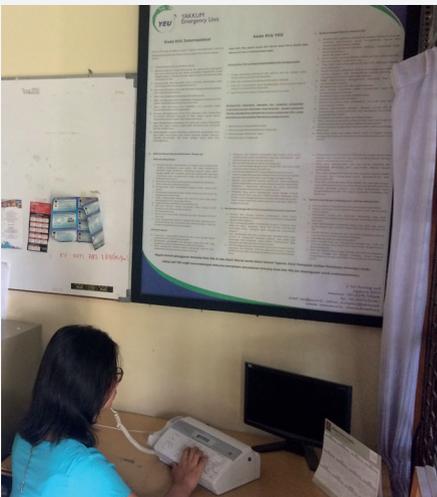
YEU Code of Conduct displayed on the office wall

Lessons learnt

- Be aware of staff turnover, or whenever there is mobilisation of volunteers, especially for short-term assistance. You will need to re-introduce PSEA for each specific context.
- PSEA is relevant for all staff – from senior staff to security, drivers, gardeners. There is no excuse.
- In smaller offices, sometimes managers have to 'switch roles' if there is a PSEA issue. Make sure they have additional training on how to deal with it.
- For Christian and other faith-based organisations, it is helpful to include PSEA in communications about organisational values and principles.
- Think about how to roll PSEA out to partners – not just other NGOs, but hospitals and others.
- Be aware that zero complaints/reports does not mean an absence of cases, but seek to review the enabling environment for the delivery of complaints/reports.

ENGAGING COMMUNITIES AND PEOPLE AFFECTED BY CRISIS

What should be in place

• Communities we work with are fully aware of the expected behavior of the organisation's staff, including organisational commitments made on the prevention of sexual exploitation and abuse.

• Communities we work with know how to complain if these commitments are not met.

• Appropriate awareness-raising tools and approaches are used with communities, which are relevant to age, language and capacity.

How to do it

1. Pull out the key messages from your organisation's policies on PSEA that communities need to know. What should communities expect from the organisation and its staff in terms of PSEA? What is unacceptable conduct?

2. Profile the community you are communicating with. Different groups (such as mothers with young children, older men or women with disabilities) will have different communication needs.

3. Consider how to communicate these key messages in a way that is relevant and accessible to the community or community group. Consider the following points:

   • Is this group literate?

   • If so, what languages do they speak?

   • If your messages are translated, it helps to have them proof-read by another party to make sure the message is correct and appropriate.

4. Develop your communication materials. There are many different ways to communicate messages, and a mixture of different types can be used. Here are some suggestions:

   • Posters

   • Leaflets

   • Acting out plays

   • Radio programmes

   • Focus group discussions

5. Involve the community throughout the process of developing your key messages communication materials. This will help ensure that your messages are appropriate, sensitive and likely to get the right message across.

6. Always make sure that the community members know how to complain if they think SEA is taking place. Include clear information on how to contact your organisation with a complaint, for example by including your phone number on a poster. *(See Developing and implementing a comprehensive complaints Mechanism)*

Good practice example

Involving the community in PSEA messages in Ethiopia

The programme

GOAL implement a wide-scale humanitarian programme in Ethiopia, providing programmes including emergency seeds, water and sanitation, and community-based management of malnutrition. They have a large number of staff across many regions, most of them Ethiopian nationals.

Testing the designs with the community

The issue

GOAL Ethiopia has a code of conduct that addresses PSEA, but found that the reality was, staff were signing it then filing it away without really being aware of its contents. GOAL decided that they would look at ways that they could bring the code of conduct to their staff and to the communities they were working with.

What GOAL did

First of all, GOAL decided to identify the key messages in the code of conduct. They asked team members to help define the four top priority messages from the code of conduct. They did this by conducting a country-wide survey.

Working with the monitoring and evaluation team, the humanitarian programme manager selected one office in each region of the country. They then held a meeting with staff in that office, and put a piece of flipchart paper on the wall for each of the points in the code of conduct. Staff were asked to mark what they thought were the top four most important points. In addition, the GOAL team surveyed staff in the country office. They put out the flipcharts on a wall in the office, and left them for a week. Staff could mark the flipcharts whenever they wanted, for example when they were going for lunch. All the responses were then added to a database, and the overall top four priorities were calculated. The four key priority messages were:

- Do not accept bribes.
- Do not abuse children.
- Do not exclude different groups in the community.
- Do not sexually exploit people.

Next, GOAL's media officer came up with some designs and images that he felt matched the four key points. The images were then taken out to communities, and were discussed with a wide group of people – different tribes and clans, beneficiaries and non-beneficiaries. At this stage, the designs did not have any writing on, as the team wanted to see if the communities understood the messages that the images were trying to convey.

There was a lot of feedback, which was all fed back to the country office. Some couldn't be taken into account, but most could. Text was also added to the images in the different local languages spoken where GOAL works. The images were then made into posters and displayed wherever possible – at the country office, in warehouses, in field offices, and so on.
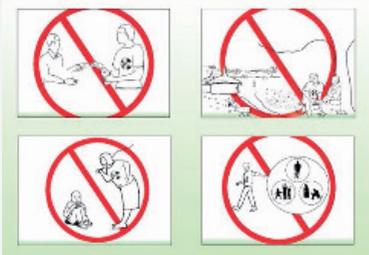
Some of the original designs….

…and the finished version

What happened as a result

As a result of the measures taken, GOAL began to receive feedback from the community, which was dealt with through the appropriate channels. The fact that PSEA was chosen as one of the four key messages shows that GOAL staff in Ethiopia take it very seriously, and communicating this to the community demonstrates GOAL's commitment on this.

Lessons learnt

- Ensure you have the participation and buy-in of key staff to roll the message out to communities. It is often assumed that this trickles down from senior management – it does not.
- Do not be afraid to approach donors to fund your PSEA activities.
- No need to create extra meetings for community feedback – add it on the meetings that are already planned.

IMPLEMENTING PSEA REQUIREMENTS WITH PARTNERS, SUPPLIERS AND CONTRACTORS

What should be in place

- Partners, suppliers and contractors are assessed for their contact with beneficiaries, and capacity to implement PSEA measures.

- Clauses on PSEA are included in all contract agreements.

- PSEA training is delivered to partners, suppliers and contractors (particularly where these organisations will have contact with beneficiaries).

- PSEA measures, and SEA cases, in partner, supplier and contractor organisations are monitored.

How to do it

1. Assess all partners, suppliers and contractors before the contracting arrangements are agreed:

   - Will the organisation/company be working directly with beneficiaries?

   - Will the services they deliver bring them into contact with beneficiaries?

   (If yes, the partner, supplier or contractor will need to have a PSEA policy and code of conduct or sign onto your policy and code of conduct)

   - What is the status of the organisation/company PSEA measures?

   - Do they have a PSEA policy and code of conduct?

   - How well has the policy been implemented throughout the organisation?

   (The responses to these questions will help you decide what support to provide to the partner/supplier/contractor)

3. Develop contracts for organisations/companies which include PSEA requirements and commitments (if necessary) to supporting the organisation/company to meet requirements.

4. Ensure that staff of organisations/companies working directly with beneficiaries sign onto a code of conduct, either yours or the that of the organisation's/company's (if it is of an acceptable standard).

5. Decide on the best approach for training the organisations/companies on PSEA, based on the context and resources available.

6. Deliver a short briefing to all organisations/companies on PSEA.

7. Include the organisation/company staff in staff training events if they are directly implementing activities or have significant contact with beneficiaries.

8. Agree with organisations/companies how to exchange information on PSEA. This should include:

   - Progress with implementing PSEA measures to be included in reports on progress with projects or services (where appropriate).

   - Concerns or cases which arise regarding the organisation/company will need to be reported to your organisation.

Partners are commonly defined as those organisations which are contracted to deliver programmes and projects, or providing funding.

Suppliers are commonly defined as organisations or companies that have been contracted to provide goods, equipment and other supplies that are being used by the organisation generally, including for the delivery of programmes and projects.

Contractors are commonly defined as organisations or companies that have been contracted to deliver specific services, such as construction work.

Implementing measures to prevent sexual exploitation and abuse (and other harm) of children with partners, suppliers and contractors

The programme

Plan International is a global international development and humanitarian organisation focused on children's rights and equality for girls. Plan International has programmes in over 70 countries and works extensively with national and local partners.

The issue

As an organisation focused on children and adolescent girls, Plan International has had policies and procedures in place for preventing harm (including sexual exploitation and abuse) to children for more than 15 years. The growing scale of Plan International's partnerships, the types of organisation partnered with, and the use of suppliers and contractors for its work, meant that Plan International must ensure that these organisations are able to work to international standards for child safeguarding, which include preventing sexual abuse and exploitation of children.

What Plan International did

Plan International's Child Protection (Safeguarding) Policy outlines minimum standards for engaging with partners, suppliers and contractors. The minimum standards require Plan's offices to assess all partners' capacity to implement measures to prevent harm to children. The assessment informs the overall decision of whether or not to work with the partner. The assessment is based on ten key questions – if the partner has a policy and code of conduct, how it recruits and inducts staff, the partner's reporting/complaints mechanisms, how child safeguarding measures are embedded in its operations and programme interventions, and its arrangements for monitoring the measures that prevent harm. Plan International will not go ahead with the partnership if they consider that the organisation presents a significant risk for children which it is unwilling to address. Increasingly, however, all organisations with whom Plan International partners are actively interested in strengthening their organisational capacity to prevent harm to children and welcome support from Plan International to do so.

All agreements made with partners, suppliers and contractors include a clause on preventing harm to children As Plan International is committed to safeguarding children generally, the requirements for partners, suppliers and contractors includes informing Plan International if any of their staff members is being investigated for harm to children, including SEA, regardless of whether they are working directly with children through the partnership or not.

The commitments described in the partnership contract, informed by the assessment, might include support to the partner for developing a policy, shared training, linked reporting/complaints mechanisms and exchanging outcomes from the monitoring of the measures for preventing harm to children.

Plan International is now supporting its national and local partners to support smaller civil society organisations (CSOs) to put minimum (suitable) standards in place for preventing harm to children. Plan International helps the national or local partner to run workshops with the civil society organisations to raise awareness on the importance of measures to prevent harm, and to agree on the measures that the civil society organisations will adopt.

What happened as a result

Plan International's approach to implementing these measures with partners, suppliers and contractors has progressed from one based on contractual compliance to an approach which contributes to improved outcomes for children's safety more generally, such as increased awareness in communities, changes to local laws and a range of organisations with appropriate policies and procedures. This has arisen from the way in which Plan International looks at the risks involved (not only considering the actual contact that organisations have with beneficiaries, but also how robust partners are in developing and implementing measures to prevent harm generally), and the investment Plan International has made in building capacity of partners, contractors, and suppliers (where necessary).

Lessons learnt

• Resources are required for supporting partners, suppliers and contractors to have the necessary measures in place Costs for preventing harm should be built into all relevant project and programme budgets – this is easier to do where the costs can be included in capacity building plans for partners (which donors tend to favour).

• A large number of partners, suppliers and contractors work with more than one organisation – are the other organisations also supporting them on measures to prevent harm? This is worth finding out to avoid duplication of effort and save resources.

• Sharing, and maximising, capacity building of partners between organisations would be valuable e.g. if one organisation is delivering capacity building interventions for partners, if possible, extend the invite to partners of other organisations working in the same location.

• In countries where the governments have legislated on SEA or harassment, use this as a driver for ensuring that partners, suppliers and contractors have the necessary measures in place.

DESIGNING SAFE PROGRAMMES AND PROJECTS

What should be in place

• Potential risks of sexual exploitation and abuse presented by programmes and projects are identified and addressed.

• Project plans include activities on PSEA awareness and sensitivity.

• Budgets include funding lines for capacity building and communications on PSEA.

How to do it

1. Assess the context in which the programme is to take place – identify the general risks and issues related to sexual exploitation and abuse in communities. Communities experiencing abuse and exploitation are also more vulnerable to it being perpetrated by staff and associated personnel, and those contracted to deliver programmes.

2. Map the patterns of behaviour within families and communities when designing programmes and projects - who fetches water, who manages household income. These patterns of behavior might make certain family members more vulnerable to SEA, such as adolescent girls whilst fetching water from remote water points.

3. Identify how the programme/project might exacerbate the risk of SEA by staff and associated personnel - will certain groups within the community not be receiving goods and services? Are the goods and services likely to be inadequate for the beneficiary population, or delivered unpredictably? Beneficiaries who desperately need goods and services will be more vulnerable to exploitation.

4. Design programmes/projects to address any risks identified – ensure all those involved in the delivery of goods and services are safe; include costs for prevention, awareness raising, training on SEA and response in programme/project budgets.

5. Incorporate awareness raising and communications on PSEA into programme/project activities.

6. Monitor, with the communities you are working with, whether the programme/project is safe – ask specific questions about whether harm or abuse has arisen because of the delivery of goods and services, whether that has been reported, and what would help to prevent this arising in future.

7. Adapt, or redesign, any programme/project that is presenting a risk of SEA by staff or associated personnel.

8. Identify and document existing local and national child protection mechanisms and related support services for referral.

Good practice example

Supporting organisational change to ensure programmes and projects are safe

The programme

Save the Children is an international NGO focused on creating, and supporting, opportunities to give children a healthy start in life, to enable children to learn and to protect children from harm. Save the Children work globally, reaching around 62 million children either working directly and through partners. Save the Children works in both development and humanitarian contexts, including those which are particularly fragile and complex.

The issue

Save the Children has been implementing PSEA measures throughout the organisation for more than a decade, as part of their commitment to safeguard children (implemented through their Child Safeguarding Policy) but also as part of their commitment to prevent sexual exploitation and abuse of adult beneficiaries. Save the Children has played a significant role in supporting the sector on PSEA, working with the IASC PSEA Task Team, contributing to the To Serve With Pride film used widely for training staff and others on PSEA and providing technical input at CHS Alliance PSEA events and conferences.

Save the Children has recently introduced key initiatives across the organisation to realise ambitions to be a high performing organisation. One of these initiatives is to strengthen organisational approaches and practices for safe programming. Safe programming in Save the Children refers to:

- Programmes and projects delivered by 'safe' staff, partners and other stakeholders.

- Programmes and projects deliver on the rights and needs identified with beneficiaries (within Save the Children's remit) to achieve positive outcomes - minimising opportunities for exploitation within communities, and from humanitarian workers.

- Programmes and projects do no harm to children or other beneficiaries – they are designed, implemented, monitored and evaluated using a risk management approach, identifying and minimising risk.

What Save the Children did

Save the Children developed a structured approach to ensuring programmes and projects are safe. The initiative was led by Save the Children's global child safeguarding team who:

- Assessed how different departments and teams in the organisation support or contribute to designing and delivering programmes, and the standards they work to.

- Adapted existing standards and processes to ensure safety is embedded into department/team work on programming.

- Developed guidance and tools on safe programming which enable staff to assess and minimise risk and to design programmes to achieve positive outcomes in safer environments.

- Built capacity of staff and partners on safe programming.

What happened as a result

The initial work on assessing how different departments and teams contribute to designing and delivering programmes highlighted how the organisation needs to work together across functions:

- Programme staff design programmes and projects – and need to understand how to make them safe.

- The risk management team provides tools and guidance on risk assessing programmes and projects, and these need to include risks associated with safe programming.

- Award management staff provide guidance and tools on agreeing to a programme/ project proposal and 'signing it off' – the guidance and tools need to to ensure the proposal includes a comprehensive risk assessment for safe programming.

- Procurement staff are responsible for obtaining supplies for the programme/ project – they need to ensure that the supplies are 'fit for purpose'.

- Technical experts on child safeguarding (and PSEA) need to be able to provide advice on how to design and deliver safer programmes.

- Monitoring and evaluation staff have an important role to play in monitoring whether the project is being implemented safely.

Save the Children developed overall guidance on child safe programming. In addition, a key part of the work was to advise departments and teams what changes they needed to make in their guidance, tools and approaches to support safe programming. They also supported the leadership in creating an organisational culture for safe programming.

Lessons learnt

- Safe programming cuts across different functions, teams or departments – make sure they all understand how to integrate safe programming into their work.

- Assessing and minimising risks is key to ensuring programmes are as safe as possible – at the very least a rapid risk assessment can be conducted at the beginning of an emergency response, but a more thorough risk assessment will be needed once the programme or project is underway.

- Projects and programmes should not be 'signed off' by management without a good risk assessment.

- All stakeholders involved in the project need to understand safe programming and be able to deliver their part of the programme safely.

- It is unlikely that you will be able to mitigate all risks – minimise them but be aware of the risks the programme or project is carrying.

- Regular monitoring of the programme or project is vital – make sure that monitoring looks for unintended negative consequences, which should then be addressed immediately.

DEVELOPING AND IMPLEMENTING A COMPREHENSIVE COMPLAINTS MECHANISM

What should be in place

- A documented complaints handling process for communities and people affected by crisis.

- An organisational culture in which all complaints, including SEA are taken seriously and acted upon.

- Communities are made aware of what behaviour they can expect from organisation staff, and of organisational commitments made on protection from sexual exploitation and abuse – and how to complain if these commitments are not met *(see Engaging communities and beneficiaries on SEA).*

- Complaints channels that are designed to proactively enable reports of SEA.

- A fast-track process for dealing with complaints about SEA.

- A referral process for complaints which do not fall within the scope of your organisation's policy.

How to do it

1. If your organisation does not already have a complaints mechanism in place, you will need to develop one. Resources are widely available to help you to develop a complaints policy, and set up a safe, secure and accessible complaints mechanism. Below are the key considerations for developing a complaints mechanism.

2. Reports on SEA should be referred directly to a named senior manager within the organisation. Staff should understand the importance of following this procedure. They should be clear that they should not try to investigate themselves, and that they should not discuss the complaint with anyone else. They must also understand their own responsibility to report any concerns they might have regarding colleagues or partners and SEA.

Key considerations for developing a complaints mechanism

Consult with communities and people affected by crisis on the design, implementation and monitoring of complaints-handling processes.

Get senior management support for the mechanism – from the start.

Ensure that staff members understand the rationale for the complaints mechanism and the importance of maintaining confidentiality, and can receive and deal with complaints confidently.

Communicate with communities so that they understand how they can raise a complaint and what they can complain about.

Have more than one channel through which communities can make complaints to your organisation. Possible channels could include SMS, email, letter, telephone hotline, information desk, complaints box or face-to-face meeting, amongst others. Consider how the safe and private these channels will be for someone complaining about SEA.

Ensure that the mechanism can manage complaints in a confidential and timely manner which ensures the safety of all involved.

3. SEA is by its nature a sensitive issue. Consider carefully whether you have developed communication channels that proactively enable reports about SEA. When consulting the community about your complaints mechanism, be sure to consult diverse groups on how they might feel comfortable in reporting SEA. Look also at how you can use existing activities to pick up concerns regarding SEA – such as work with women's groups, or outreach work on gender-based violence.

4. Organisations are increasingly developing joint complaints mechanisms, some focusing on SEA. Find out if there is a joint complaints mechanism in your area of operation, and consider whether you would like to participate. Participating in a joint complaints mechanism will usually mean agreeing to common standards and procedures for dealing with SEA for all members.

5. Monitor and review your PSEA complaints mechanisms on an ongoing basis to check:

- Is the mechanism receiving complaints? What kind of complaints are they receiving? If your complaints channels are not picking up reports of SEA, explore the possible reasons for this

- Is the mechanism appropriate? Does the community feel comfortable using it?

- Does the mechanism put users at further risk?

- Who is using the mechanism? Is it reaching all community groups, including the most vulnerable?

- Are complaints, including reports of SEA, being followed up appropriately within your organisation?

6. If you open up the possibility of SEA reports with the community, it is absolutely vital that you follow them up. Raising concerns of SEA can be distressing for the complainant, and we have a responsibility to take it seriously. Not following up such serious concerns could lead to a breakdown of trust between your organisation and the community who have raised the concerns. *(See Responding to reports of SEA.)*

Good practice example

PSEA complaints mechanisms on the Thai–Burma border

The programme

The Committee for the Coordination of Services to Displaced Persons in Thailand (CCSPDT) is a network of NGOs and community-based organisations working with displaced people in camps along the Thai-Burma border.

The issue

CCSDPT wanted to provide an environment where refugees, particularly those most vulnerable in their communities, knew they were able to access services free from abuse and exploitation.

What CCSDPT did

First of all, CCSDPT developed an inter-agency protocol for dealing with complaints of SEA. The protocol included:

- The channels through which complaints might be received.
- Assigning Focal Points to deal with and refer incoming complaints.
- Clear guidance on management responsibilities for dealing with complaints once they were received.
- Procedures for investigating complaints of SEA.
- How to refer complaints made about another network member.
- Support to survivors of SEA.
- Establishing a steering committee to ensure complaints were being dealt with according to the protocol.

CCSDPT member agency staff at work

Member agencies then implemented a widespread roll-out of PSEA measures to the camps. Entry points for complaints were designed, including through existing structures such as community-based organisations, the sexual and gender-based violence committees, complaints boxes, or reporting directly to the agency.
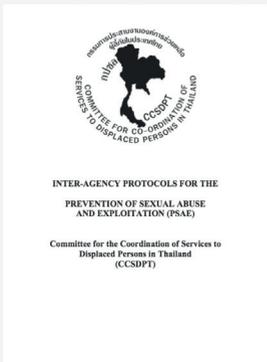
The CCSDPT Protocols

Awareness raising was then conducted through community-based organisation representatives. This included PSEA messaging in local language on caps and bags, and through theatre and radio broadcasts.

What happened as a result

Cases of PSEA began to reported to CCSDPT, and were dealt with according to the protocol. Three years after the mechanisms were introduced, an assessment found that the community perceived that SEA had significantly reduced.

From the Compendium of Practices on Community-Based Complaints Mechanisms, IASC, 2012

Lessons learnt

• Consult with beneficiaries and CBOs on your complaints mechanism from the design stage onwards, otherwise it can affect use and sustainability.

• Consult with vulnerable groups, such as new arrivals to the camp, single women and children on reporting mechanisms.

• Consider different community languages and customs from the start.

• Consider how to ensure the momentum on PSEA is maintained once dedicated resources are no longer available.

RESPONDING TO REPORTS OF SEA

What should be in place

- Written procedures on responding to reports or concerns relating to SEA Investigations are undertaken in line with the relevant standards and guidance.

- Investigations are undertaken by experienced and qualified professionals, who are trained on sensitive investigations such as allegations of SEA.

- Substantiated complaints result in either disciplinary action or contractual consequences.

How to do it

1. Make sure your organisation has policies and procedures in place for responding to reports or concerns relating to SEA. Tools and resources are widely available to help you with this.

2. When you receive a report, or hear of a concern about SEA, there may be several different actions the organisation might take. These could include:

   - The report or concern does not actually represent a breach of policy – no actions taken.

   - The report or concern results in immediate dismissal according to your organisation's disciplinary procedures – for example, if there is already clear evidence that SEA took place, or the staff member does not deny it.

   - If the report involves a criminal act, it must be referred to the local authorities if it relates to a child under the age of 18, it may be referred to the local authorities if it involves an adult, s/he agrees to a referral and if this does not represent a protection risk to anyone involved.

   - More information is needed to determine if SEA took place, which may require an investigation.

Remember if a report has been raised through your complaints mechanism, you will need to respond to the complainant to let them know you have processed the complaint and resolved the issue. For confidentiality reasons, more detailed information is not usually provided.

3. If an investigation is required, it is advised that it is undertaken by experienced and qualified professionals, who are trained on sensitive investigations such as allegations of SEA. If there is no-one within your organisation with these qualifications and training, you should consider accessing external resources to help you. Contact CHS Alliance for further information.

   It is extremely important that reports relating to SEA are investigated properly. If you do not follow due process, it can make it harder for you to discipline or dismiss a staff member. Staff members who have been the subject of concerns may move on to work for other organisations without the issue having been addressed. Staff members who are the subject of an allegation are entitled to a fair process to determine what actually happened, rather than being subject to gossip and rumours.

4. Once the SEA case has been resolved, there are several issues you will need to consider:

   - Confidentiality will still need to be maintained. The issue should not be discussed with anyone other than on a need-to-know basis.

   - All paperwork relating to the case will need to be kept securely.

- Your organisation will need to have a policy on what goes on the personnel file of the staff member against whom the complaint was made – whether it was upheld or not.

- If a staff member was found to have breached the Code of Conduct, be clear on what can be included legally in their references.

5. A case of SEA can have an impact on staff morale. By the time a complaint is made, there might already have been months of rumours and concerns circulating in the affected office, and in the wider community. Staff may then feel excluded by the investigation, as confidentiality requirements mean they can know nothing about it. They may feel let down by the conclusion. The organisation may well have to invest time in restoring staff and community morale, by listening to their concerns and reassuring them that due process has been undertaken, whilst explaining why some aspects of the case need to remain confidential.

Good practice example

Oxfam GB's case management procedures

The programme

Oxfam Great Britain is one of the 18 Oxfam affiliates that make up the confederation of Oxfam International. Oxfam's aims are:

• to prevent and relieve poverty and to protect vulnerable people, including through humanitarian intervention.

• to advance sustainable development.

• to promote human rights, equality and diversity, in particular where to do so contributes to the prevention and relief of poverty.

Oxfam GB achieves this through working in three interconnected ways, on humanitarian, development and advocacy programmes. Their work focuses on active citizenship, advancing gender justice, life saving programmes, sustainable food and financing for development. They currently work in 51 countries globally.

The issue

Oxfam has long recognised the importance of preventing sexual exploitation and abuse, and has been putting measures in place for over ten years. Work has been done to implement stringent policies, and make staff aware of their responsibilities. Additionally, Oxfam has invested in making the communities they work with aware of their rights in terms of assistance, and have put measures in place to enable them to give feedback and make complaints.

Oxfam PSEA poster

Oxfam recognises that if you invite people to report concerns of sexual exploitation and abuse, it is vital that you have the procedures in place to follow them up appropriately. Not doing so is likely to cause additional risk and distress to complainants, and also greatly risks your relationship of trust with your staff and the communities you are working with.

What Oxfam did

Oxfam established various entry points for reporting SEA (and other serious misconduct), including reporting to line managers or other appropriate senior staff members; a network of safeguarding focal points; a whistleblower hotline and community-based complaints mechanisms.

Oxfam also developed a system for dealing with SEA reports when they enter the organisation. The steps are as follows:

1. Refer safeguarding/SEA reports to Oxfam's safeguarding team.

2. Assign responsibility for the case to the relevant staff member. This could be the country director, or somebody more senior according to what is appropriate in each case. This person will be the decision maker for this case.

3. Convene a case conference. This usually consists of:

   • head of global safeguarding

   • Decision maker (see above)

   • Person who received the report (such as the focal point, or manager)

   • HR manager

4. Conduct and sign off on risk assessment. Sign off must be given jointly by the head of global safeguarding and the decision maker.

5. Decide on next steps to take and write a terms of reference if necessary.

6. When case is concluded, refer to HR policy and procedure to conclude case as appropriate (for example, disciplinary action, notes on file, etc, depending on the outcome of the investigation).

Disciplinary action does not necessarily mean dismissal – it could be a written warning, a meeting with the manager, a note on the file etc. However it usually results in one of these two outcomes, due to the seriousness of SEA.

It does not matter who fulfils roles in case management, as long as:

• The decision maker is a senior staff member (country director or equivalent).

• The investigators (if an investigation is required) are not the same people as the decision makers.

• Everyone involved has an understanding of PSEA issues and procedures – not just the investigators. It is worth providing additional training on PSEA and case management to everyone with decision-making responsibility.

What happened as a result

Oxfam's measures have resulted in an increase in reports of SEA, which are handled according to the procedures outlined above.

The safeguarding team found that most reports were made to an individual. This would either be someone the complainants knew in person, such as a trusted manager or a focal point, or because they had seen someone's name and picture on a document or website. Very often, reports would come about after a safeguarding workshop – participants might approach the trainer afterwards with specific issues. Reports are less likely to come in through an impersonal channel, like the whistleblowing e-mail address – although its important to have these channels, so that people have different options through which they can raise a concern.

In 2015/16, Oxfam handled 64 reports of sexual exploitation and abuse (this includes reports from all areas of their work, including their UK-based shops). Oxfam sees this as a sign that they are improving visibility of this important issue and giving victims more confidence to report incidents.

Lessons learnt

- Staff involved in responding to reports need to have the right understanding of, and attitude towards, sexual violence.

- You can access experts at a national level, in wider civil society – people with experience in the police, legal professions, or in fraud can all potentially make good SEA investigators or advisors – although they must be well managed and must have the right attitude towards sexual violence (as above).

- The more self-reflective your organisation is, more you will succeed. Responding to SEA will not work as a 'box ticking' exercise.

- There will be staff who do not respect case management procedure: for example not referring reports, try to investigate themselves, or trying to get confidential information from the case management team – these should be treated as disciplinary matters.

- If you are smaller NGO, there is plenty of help out there for you. Borrow someone else's policies. Ask larger or international partners for help - capacity building should be part of their responsibility.

- You are not on your own. If in doubt, ask an NGO with expertise to help! The CHS Alliance can also provide you with guidance and support.

NOTES