

**Guidelines to implement the
Minimum Operating Standards for
Protection from Sexual Exploitation and Abuse
by UN and non-UN Personnel**

March 2013

**Facilitated by the Interagency Standing Committee
(IASC) Task Force on Protection from Sexual
Exploitation and Abuse (PSEA) by our own staff**

TABLE OF CONTENTS

Acronyms.....	3
Definitions	4
Purpose and structure of the Guidelines	7
Acknowledgements	10
1. Effective Policy Development and Implementation.....	11
2. Cooperative Arrangements	17
3. A dedicated department/focal point is committed to PSEA among personnel	18
4. Effective and comprehensive communication from HQ to the field on expectations regarding raising beneficiary awareness on PSEA.....	23
5. Effective community based complaints mechanisms (CBCM).....	27
6. Effective recruitment and performance management	33
7. Effective and comprehensive mechanisms are established to ensure awareness-raising of SEA amongst personnel.....	35
8. Internal complaints and investigation procedures are in place	38

ACRONYMS

CBCM	Community-Based Complaint Mechanism
CoC	Code of Conduct
CCSDPT	Committee for the Coordination of Services to Displaced Persons in Thailand
GB	Great Britain
HQ	Headquarters
HR	Human Resources
IASC	Inter-Agency Standing Committee
IFRC	International Federation of the Red Cross and Red Crescent Societies
IMC	International Medical Corps
IOM	International Organization for Migration
IRC	International Rescue Committee
JRS	Jesuit Refugee Service
KAP	Knowledge, Attitude and Practice
MOS	Minimum Operating Standards
NGO	Non Governmental Organization
PSEA	Protection from Sexual Exploitation and Abuse
SCUS	Save the Children US
SEA	Sexual Exploitation and Abuse
TBBC	Thailand Burma Border Consortium
UN	United Nations
UNDP	United Nations Development Programme
UNHCR	Office of the United Nations High Commissioner for Refugees

DEFINITIONS

For the purpose of these guidelines, the following definitions¹ are used:

Accountability – a situation in which people who are affected by decisions (e.g. staff or people of concern) are able to influence the decisions and decision-makers through questions and complaints. Accountability implies one person’s right to ‘have a say’ and another person’s duty to consider and respond.

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

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

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 organizational policies or codes of conduct. Examples of mechanisms include suggestion boxes, whistleblowing policies and designated focal points.

Evidence – information gathered during the investigation that proves or disproves an allegation.

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

Gender – refers to the social attributes and opportunities associated with being male and female and the relationships between women and men and girls and boys, as well as the relations between women and those between men. These attributes, opportunities and relationships are socially constructed and are learned through socialization processes. They are context/ time-specific and changeable. Gender determines what is expected, allowed and valued in a women or a man in a given context. In most societies there are differences and inequalities between women and men in responsibilities assigned, activities undertaken, access to and control over resources, as well as decision-making opportunities. Gender is part of the broader socio-cultural context. Other important criteria for socio-cultural analysis include class, race, poverty level, ethnic group and age².

Incentive worker – an individual who receives non-monetary compensation for work or representation for an organization. Incentive workers are usually drawn from the beneficiary community.

Investigation procedures or protocol – a framework developed by organizations to conduct impartial investigations into allegations of misconduct.

¹ The definitions have been modified from Building Safer Organizations Guideline – Receiving and investigating allegations of abuse and exploitation by humanitarian workers – ICVA.

² <http://www.un.org/womenwatch/osagi/gendermainstreaming.htm>

Partner – an organization executing a project or undertaking any other work in the name of another organization. Based on the Oath of Confidentiality prepared by the United Nations High Commissioner for Refugees.

Person of concern or beneficiary – a person who receives assistance as part of either emergency relief or development aid through assistance programs.

Physical abuse of a child – act/s or omission/s which results in actual or potential physical harm to a child from an interaction or lack of interaction, which is reasonably within the control of a parent or a person in a position of responsibility, power, or trust. There may be single or repeated incidents.

Risk – the possibility of loss or harm and/or the probability of an adverse occurrence.

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

Sexual abuse of children – the involvement of a child in sexual activity that s/he does not fully comprehend, give informed consent to, or for which s/he is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. It may include, but is not limited to, the inducement or coercion of a child to engage in any unlawful sexual activity; the exploitative use of a child in prostitution or other lawful sexual practices; the exploitative use of pornographic performances and materials.

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.

Sexual exploitation and abuse (SEA) by UN and non-UN personnel/among personnel prevention strategy – plans and actions designed and implemented by organizations to reduce the risk of sexual exploitation and abuse of people of concern. Common measures include awareness-raising, staff training, improved recruitment policies, whistleblowing policies, complaint mechanisms, investigation procedures and codes of conduct.

Staff member or Personnel – a person who works for or represents an organization, whether or not s/he is compensated monetarily. Staff member in this context means the same as Personnel.

Subject of the complaint (SOC) – the person alleged to have perpetrated the misconduct in the complaint.

Survivor or victim – the person who is, or has been, sexually exploited or abused. This term implies strength, resilience and the capacity to survive.

Whistle-blowing policy – an organizational policy which encourages staff members to report concerns or suspicions of misconduct by colleagues. The reports may concern people at other organizations and people at other levels in the organization's hierarchy.

Witness – a person who gives testimony or evidence in the investigation, including the person who has experienced the sexual exploitation and/or abuse the complainant, a person of concern, a staff member of a partner agency, the subject of the complaint or another staff member, etc.

PURPOSE AND STRUCTURE OF THE GUIDELINES

The purpose of developing these Guidelines is to provide guidance to members of the 'Inter-Agency Standing Committee (IASC) Task Force on Protection from Sexual Exploitation and Abuse (PSEA) by our own staff' to implement the Minimum Operating Standards on PSEA (MOS-PSEA). They are the result of an idea that was suggested at the IASC Task Force's meeting on 7 February 2012, to develop technical notes to accompany the MOS-PSEA.

The MOS-PSEA are modelled after the well-known Minimum Operating Security Standards for Staff Safety (or MOSS) compliance mechanism, which is mandatory for the United Nations (UN) System to ensure there is a common set of requirements that all agencies follow in order to ensure staff safety.

The MOS-PSEA are based on:

1. The Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel, August 2008
2. The Global Review of protection from Sexual Exploitation and Abuse by UN, NGO, IOM and IFRC Personnel, July 2010
3. The IASC Six Core Principles Relating to Sexual Exploitation and Abuse, June 2002

After being developed for several months, the eight MOS-PSEA were finally endorsed by the IASC Task Force on PSEA's members during the April 2012 meeting.

The four pillars of the current PSEA work provide the framework for the eight MOS and are as follows:

1. Management and coordination

- Effective policy development and implementation
- Cooperative arrangements
- A dedicated department/focal point is committed to PSEA

2. Engagement with and support of local community population

- Effective and comprehensive communication from HQ to the field on expectations regarding raising beneficiary awareness on PSEA
- Effective community based complaints mechanisms (CBCM), including victim assistance.

3. Prevention

- Effective recruitment and performance management
- Effective and comprehensive mechanisms are established to ensure awareness-raising on SEA amongst personnel

4. Response

- Internal complaints and investigation procedures are in place.

For each of the eight standards set out in the MOS-PSEA under the four pillars, the Guidelines provide current practice and examples from across the UN system, NGOs, IOM and the IFRC. We structured the MOS Guidelines in such a way that the user can just read the MOS they are interested in without going through all of them. For this reason, some examples and language are used several times under different MOS. In order to provide as much information as possible, each example specifies which agency has implemented them. Early 2012, the IASC Task Force on PSEA sent a call to its members to provide their internal practices when it comes to PSEA. Most of the examples provided come from the agencies who responded to this call. The examples are therefore not exclusive and even if their names are not mentioned, several agencies have the same practices or similar ones.


For technical support or any clarifications, or if you want to learn more about the examples and wish to contact the agency focal points, please contact the co-chairs of the IASC Task Force on PSEA.

ACKNOWLEDGEMENTS


These guidelines are the result of the collective effort of Task Force members and could not have been produced without the willingness of members to contribute to it. Specifically, the following organizations submitted practices for compilation: Concern Worldwide, International Medical Corps, IOM, IRC, Oxfam GB, Save the Children US, UNDP, UNHCR, WorldVision.

The following individuals worked on the present compilation and are thanked for time, effort, and energy volunteered: Jaqueline Carleson (UNDP), Marie Elseroad (International Medical Corps), Luc Ferran (IRC) Sylvia Lopez-Ekra (IOM).

1. EFFECTIVE POLICY DEVELOPMENT AND IMPLEMENTATION

1. Effective Policy Development and Implementation		
Indicator (MOS)	How to use the performance indicator	Current practice and examples
<p>A policy stating standards of conduct, including acts of SEA, exists and a workplan to implement the policy is in place.</p>	<p>To meet the requirement of this indicator there should be:</p> <p>A) POLICY STATING STANDARDS OF CONDUCT, INCLUDING ACT OF SEA</p> <p>The policy describes the minimum standards of behavior that your organization expects its staff to follow. It promotes good practices and behaviour expected from staff and can serve as a preventive tool. Alternatively, it provides the grounds for discipline or termination of employment should staff fail to meet the organization’s standards. Whether you revise your existing code of conduct or draft one specific to SEA, you should have a code that explicitly prohibits SEA and reflects the IASC Six Core Principles Relating to Sexual Exploitation and Abuse³ as well as the UN Secretary General’s Bulletin.</p> <p>1. “Sexual exploitation and abuse by humanitarian workers constitute acts of</p>	<p>A number of agencies have a code of conduct (CoC) in place. Examples include:</p> <ul style="list-style-type: none"> • IRC: “The IRC Way: Standards for Professional Conduct” <div style="text-align: center;">  <p>The IRC Way - Standards for Profes:</p> </div> <ul style="list-style-type: none"> • Save the Children US: Code of Ethics and Business Conduct • UNHCR: Code of Conduct & Explanatory Notes • Oxfam GB: Policy on Prevention of SEA • UN agencies and several NGOs: Secretary-General’s Bulletin Special measures for protection from sexual exploitation and sexual abuse ST/SGB/2003/13 (most of the UN agencies and NGOs have a code of conduct in place that includes the UN SG’s bulletin language) • IRC/CCSDPT has a Code of Conduct toolkit • In addition to the Code of Conduct toolkit, IRC/CCSDPT has a checklist in place : PSEA Implementation Checklist disaggregated by sector.

³ See Report of the Inter-Agency Standing Committee Task Force on Protection from Sexual Exploitation and Abuse in Humanitarian Crises of 13 June 2002, Plan of Action, Section I.A.

	<p>gross misconduct and are therefore grounds for termination of employment.</p> <ol style="list-style-type: none"> 2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense. 3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries. 4. Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work. 5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms. 6. Humanitarian workers are obliged to create and maintain an environment which 	<ul style="list-style-type: none"> • In March 2012, IOM provided a workplan template to the Sr. PSEA focal points: <div style="text-align: center;">  <p>PSEA Workplan Template.docx</p> </div>
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	<p>prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.”</p> <p>B) A WORK PLAN TO IMPLEMENT THE POLICY IS IN PLACE</p> <p>The workplan to implement the policy should ideally include objectives, activities, outputs, indicators, responsible unit/personnel, timeframe and budget. Furthermore the work plan should be endorsed and supported by Senior Management and linked to accountability activities and objectives in order to succeed in its implementation.</p>	
<p>The policy/standards of conduct have been conveyed to current staff and senior management (at HQ and field level) on repeated occasions (such as inductions and refresher trainings).</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <p>Your code of conduct should be accessible in each country’s predominant language; some countries may require translation into several different languages.</p> <ul style="list-style-type: none"> ➤ Ensure that every staff member signs the code of conduct upon hire - consider having a witness sign as well - and enter the document into his/her 	<ul style="list-style-type: none"> • SCUS Code of Ethics and Business Conduct was updated at the end of 2011 and disseminated agency-wide. New Code was accompanied by a mandatory on-line training. • UNHCR conducts mandatory Annual Refresher Courses in each Office, on a theme decided by the Ethics Office based on feedback from the Regional Bureaux and field Offices. • IMC conducts a two-hour PSEA training for new hires which includes information on how to file a complaint. IMC also conduct annual refresher trainings for all staff around the

	<p>personnel file.</p> <ul style="list-style-type: none"> ➤ Create a monitoring system to ensure that all staff have signed the CoC and that the signed CoC is appropriately filed into the appropriate personnel file. To monitor this activity on an ongoing basis, consider including in regular field audits a check of personnel files for signed codes of conduct. ➤ Publicize and disseminate these documents throughout all offices. Ask all the offices to display them in a place accessible for all staff to read. <p>A STAFF ORIENTATION upon hire will help ensure that your PSEA policies are understood and taken seriously. A refresher training every year after that will ensure sustainability. You should be prepared to provide the same PSEA orientation, on an ongoing basis, to volunteers, contractors, interns, and anyone else doing business with or through your organization in the field, including board members.</p> <p>Tips for a successful orientation / refresher training:</p> <ul style="list-style-type: none"> ➤ Have one of your senior executives open the orientation and address staff to underscore the importance of the subject matter. ➤ Orientation modules could include an explanation of SEA, your code of 	<p>world. Each year, their staffs re-sign the IMC code of conduct.</p> <ul style="list-style-type: none"> • UNDP has included PSEA in their mandatory online Ethics training that must be taken by all UNDP staff. • IRC/CCSDPT designed CoC posters in Karen, Burmese, and Thai. • TBBC includes PSEA in new staff orientations. • For many organizations, expatriate staff codes of conduct are entered into a headquarters file while field offices retain national staff files. • These are several helpful resources available on the IASC Task Force on PSEA's website that you may use or adapt for your own orientation and refresher trainings: <ul style="list-style-type: none"> ✓ To Serve With Pride: Zero Tolerance for Sexual Exploitation and Abuse, A 20-minute film and facilitator's guide by ECHO/ECPS UN and NGO Task Force on Protection from Sexual Exploitation and Abuse ✓ UNICEF's Training of Trainers on Gender-Based Violence: Focusing on Sexual Exploitation and Abuse ✓ Understanding Humanitarian Aid Worker Responsibilities: Sexual Exploitation and Abuse Prevention • IOM has the article on PSEA from their CoC translated in 50 languages and posted on our intranet and in all public areas in our office around the world. They have a dedicated intranet page on PSEA. They have new posters ready to be rolled out in 3 official languages. They have a half of day sensitization session done yearly with a different PSEA related theme every year. They also
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	<p>conduct, complaints and investigations procedures, disciplinary consequences for non-compliance, and other relevant policies.</p> <ul style="list-style-type: none"> ➤ Be sure to highlight your staff’s mandatory duty to report SEA complaints and concerns and allow sufficient time during orientation for questions from staff. Your ultimate goal is their full understanding of, support for, and compliance with your policies. ➤ Develop orientation modules and materials that can be translated and delivered in each of the countries where you work. <p>A “TRAIN-THE-TRAINER” APPROACH can maximize limited resources while ensuring quality orientation for all staff. You may want to appoint and train SEA focal points in each field office to train the teams or management staff to travel to each region/country to deliver your SEA orientation to senior management. Because managers have a special responsibility to maintain an environment that discourages SEA, conduct additional training for them.</p> <p>KEEPING THE MOMENTUM GOING Strategic messaging from senior management and ongoing education is necessary to keep your SEA efforts fresh in your staff’s minds.</p> <ul style="list-style-type: none"> ➤ Use all-staff meetings, internal 	<p>designed a facilitator guide that made it accessible for approximately 200 facilitators to deliver the training on their own. There is a session on PSEA in the IOM Chief of Mission training. Finally, IOM Director General regularly give update on PSEA during Town Hall meetings with all HQs staff as well as some missions in the field following via videoconference</p>
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	<p>newsletters, web-based collaboration functions, etc., to share SEA messages.</p> <ul style="list-style-type: none">➤ Test and maintain staff knowledge of your code of conduct and SEA policies through refresher trainings.➤ Include attendance of the refresher training in annual performance evaluations and as items to be evaluated by internal audit teams.	
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2. COOPERATIVE ARRANGEMENTS


2. Cooperative Arrangements		
Indicator (MOS)	How to use the performance indicator	Current practice and examples
<p>SG's Bulletin (ST/SGB/2003/13) or respective codes of conduct are included in general contract conditions.</p>	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ A PSEA by UN and non-Un related personnel clause added into all standard contract and agreement templates with implementing partners and service providers. 	<ul style="list-style-type: none"> • IOM has a PSEA clause added into all standard contract and agreement templates with implementing partners and service providers. <div style="text-align: center;">  <p>IOM standard PSEA clause for IOM Contr</p> </div> <ul style="list-style-type: none"> • SCUS require any entity or individual who will be in contact with children to acknowledge receipt of SCUS Child Safety policy (which includes reference to PSEA).
<p>Procedures are in place to receive written agreement from entities or individuals entering into cooperative arrangements with the agency that they are aware of and will abide by the standards of the PSEA policy.</p>	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ Whenever your organization enters into a cooperative arrangement with another individual or entity - such as another international NGO, a business vendor, a community-based organization, etc. - you should inform them of your code of conduct and receive a written, signed, and dated statement in return, stating that they accept your standards. 	<ul style="list-style-type: none"> • UNHCR Implementing partners are obliged to sign the annexed Code of Conduct which forms part and parcel of any financial or co-operation agreement. • All implementing partners entering arrangements with UNDP are obliged to sign a contract stating they are aware of the standards set out in the ST/SGB/2003/13.

3. A DEDICATED DEPARTMENT/FOCAL POINT IS COMMITTED TO PSEA AMONG PERSONNEL

3. A dedicated department/focal point is committed to PSEA		
Indicator (MOS)	How to use the performance indicator	Current practice and examples
<p>A dedicated department/focal point have the overall responsibility for the development and implementation of PSEA policy and activities.</p>	<p>To meet the requirement of this indicator there should be:</p> <p>A PERSON DEDICATED TO AT LEAST 50% TO PSEA:</p> <ul style="list-style-type: none"> ➤ Experience has shown that without a person in the organization dedicated at least at 50% to the implementation of the protection from SEA program, progress are very slow. To have a successful implementation throughout your organization of the PSEA program, it is recommended to have a person or a department dedicating at least 50% of their time to the issue. <p>FOCAL POINTS:</p> <ul style="list-style-type: none"> ➤ Focal points play a very important role in preventing and responding to SEA. In each of your countries they can help raise awareness of SEA and your prevention and response program, identify new and improved prevention. ➤ The IASC drafted model terms of reference for field focal points, which you may adapt for your own purposes. These terms of 	<ul style="list-style-type: none"> • IRC, UNDP, UNHCR and Concern Worldwide have a full time personnel member focusing solely on PSEA. • IMC and Oxfam UK have staff focusing at 50% on PSEA. • IOM has strategically placed the PSEA portfolio with the Office of the Director General with the technical support from the Gender Coordination Unit. Within the organization, a Task Force on PSEA has been created to coordinate PSEA activities and an Action Plan Group on PSEA is in charge of the implementation of the IOM Plan of Action on PSEA. • UNHCR has a dedicated department (the Ethics Office) and a Senior Advisor working on PSEA. Currently all Field Offices are required to appoint a PSEA Focal Point who may also act as the SGBV Focal Point in any given Office. As such they are provided with the necessary training, including online mandatory training. • IMC has a cross-departmental working group to address SEA organization-wide which comprises staff from Human Resources (HR), Operations, Security, Health Technical Unit, and the Accountability and

	<p>reference are available on the IASC Task Force on PSEA’s website.</p> <ul style="list-style-type: none"> ➤ Choose your focal points carefully. Ask your country director or other senior managers to recommend staff for these roles. Selection criteria should include the following competencies and experience: <ul style="list-style-type: none"> ✓ Proven integrity, objectivity, and professional competence; ✓ Demonstrated sensitivity to cultural diversity and gender issues; ✓ Ability to maintain confidentiality; ✓ Fluency in relevant languages; ✓ Demonstrated experience working directly with local communities; and ✓ Proven communication skills. ✓ In addition, your focal points should have positions that allow for regular interaction with the beneficiary community. Someone office based tasks may not be accessible to those who cannot travel, who feel unsafe in your office, or who are afraid to be seen making an SEA complaint. ➤ Training for focal points is critical. Several resources exist that you may adapt to 	<p>Quality Assurance Unit, as well as Legal Counsel. It is co-chaired by staff from HR and the Domestic and International Affairs department. The group meets monthly and oversees the implementation of the organization’s SEA policy. In addition, one dedicated HR staff person has half of his/her work time committed to ensuring proper implementation of the SEA policy and procedures and continued training of all staff as well as investigation.</p> <ul style="list-style-type: none"> • Pilot inter-agency trainings for SEA by UN and non-UN related personnel focal points were conducted in Kenya (for the Somali Country team), Libya, Indonesia, Nepal, Liberia and Côte d’Ivoire during 2008-2009. The evaluation of these trainings may help you as you develop your own training program.
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	<p>reflect the particulars of your organization's SEA complaints mechanisms (The OCHA Focal Points Training Package is available on the IASC PSEA Task Force website).</p> <ul style="list-style-type: none"> ➤ Most UN agencies and some NGOs have already established focal points. To enhance SEA coordination and support in the field, some countries have an UN-led SEA focal point network for which the IASC has established terms of reference. ➤ While your own focal points may not participate in the network directly, they should develop and maintain relationships with the NGO representative and other members. ➤ Finally, the value of SEA focal points is not limited to the field. Consider training headquarters SEA focal points as well, whom you might task with assisting in staff orientation, raising awareness of SEA, and providing support to headquarters staff who have questions or receive SEA complaints. 	
<p>The responsible department/focal point is required to regularly report to</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ Regular reports sent to Senior 	<ul style="list-style-type: none"> • Within IOM PSEA is regularly raised during Senior Management Meetings and special Senior Management Team meetings on PSEA have been

<p>senior management on its progress on PSEA through the Senior Focal Point on PSEA.</p>	<p>Management on progress of the implementation of the PSEA program allow keeping senior management engaged on the issue of SEA.</p> <ul style="list-style-type: none"> ➤ You can choose several ways to report to SM: through your Sr. SEA Focal Point; through the senior management meetings; through a SEA cross-departmental working group; through the head of the department to which the focal point belongs. 	<p>organized. PSEA is also regularly on the agenda of the Management Coordinating Committee.</p> <ul style="list-style-type: none"> • Within IMC, the SEA cross-departmental working group meets monthly and oversees the implementation of the organization’s SEA policy and advises the PSEA technical advisor. The head of Human Resources is part of the department and reports progress directly to senior management.
<p>Staff members dealing with PSEA have formalised responsibility for PSEA in their job description, performance appraisal or similar.</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ Country directors, SEA focal points at HQ and in-country, investigators, managers at all levels or anyone else addressing PSEA should have these responsibilities in their terms of reference. This will reinforce the accountability, ownership and importance of the issue for the organization. ➤ PSEA should also be included in their performance appraisal. This will allow the organization to measure their work on PSEA by UN and non-Un related personnel. Despite good willingness to work on the issue, because of staff’s busy schedule, PSEA can fall back, unless it is fully included in the performance appraisal cycle. 	<ul style="list-style-type: none"> • The IASC Task Force on PSEA’s website has examples of Terms of References for in-country PSEA Focal Point. • CCSDPT has outlined Responsibilities for Appointed Roles within CCSDPT Agency  CCSDPT 110621 PSAE Appointed Staff

<p>They have received systematised training on PSEA and the time committed to PSEA is commensurate with the scale of implementation required under the current situation of the organisation.</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ It is important for staff members dealing with the issue to be regularly trained. This will insure quality of the implementation of the PSEA program and engagement from staff members dealing with PSEA. 	<ul style="list-style-type: none"> • The former ECHA/ECPS Task Force on PSEA developed training packages for PSEA Focal Points and Senior Managers. These training packages are available in French on the same website. • InterAction has online trainings on SEA Investigations and Community-Based Complaint Mechanisms (CBCM).
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4. EFFECTIVE AND COMPREHENSIVE COMMUNICATION FROM HQ TO THE FIELD ON EXPECTATIONS REGARDING RAISING BENEFICIARY AWARENESS ON PSEA


4. Effective and comprehensive communication from HQ to the field on expectations regarding raising beneficiary awareness on PSEA		
Indicator (MOS)	How to use the performance indicator	Current practice and examples
The HQ has communicated in detail the expectations regarding beneficiary awareness raising efforts on PSEA (including information on the organisation's standards of conduct and reporting mechanism).	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ It is not enough to establish your prevention and response policies and train your staff. Above all else, beneficiaries must know, understand - and contribute to - your SEA standards and procedures. At a minimum, beneficiaries have a right to know: <ul style="list-style-type: none"> ✓ The definition of sexual exploitation and abuse as per the SG's Bulletin and your organization's; ✓ The agency's code of conduct; ✓ That they have a right to be protected from sexual exploitation and abuse, including specific details of their food and non-food entitlements; ✓ How they can complain, including the stages, timeframes, rules, decision-making processes; ✓ Participants, and responsibilities involved in a complaint; 	<ul style="list-style-type: none"> • Concern Worldwide has developed several materials to train their staff on raising beneficiary awareness and implementing community-based complaints mechanisms. • IMC trains their beneficiaries as part of their GBV projects. Staff in charge of beneficiaries' awareness-raising are employed by the GBV project. • The IASC Task Force's Model Information Sheet for Local Communities is one literacy-based method of communicating these basics, which can be translated and posted publicly in your field sites.

	<ul style="list-style-type: none"> ✓ To whom they can complain and where that person is located; and ✓ What steps they can take to ensure confidentiality and what steps your organization will take to ensure safety and confidentiality ➤ More importantly, your field staff should develop appropriate outreach, information, and education activities in each country and site through beneficiary engagement. To do so, they should consider: <ul style="list-style-type: none"> ✓ Audience(s) - what is the gender, age, physical ability, language, level of literacy, and ethnicity of your target population, disability?? ✓ Available communication tools – is it better to advertise through posters, dramas, radio, TV or cell phone messages, music, focus groups, local action, and/or community groups? ✓ The core message – what does the target population really need to know? ✓ The budget – how can you reach the widest cross-section of the community within budgetary constraints? ✓ Before you launch your orientation or information campaigns, test your messages with a variety of 	
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	<p>stakeholders - including vulnerable populations - to ensure that the messages are culturally appropriate.</p> <ul style="list-style-type: none"> ➤ Examples of SEA outreach and awareness campaigns by UN agencies and NGOs in various countries include t-shirts, wrist bands, radio messages, bumper stickers, posters, dramas, videos, and more. Make sure you awareness-raising material is not victimizing, offending to the community or sending a confusing message as it could cause more damage than positive changes. 	
<p>The HQ has distributed examples of awareness raising tools and materials to be used for beneficiary awareness raising activities.</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ Your organization should do an awareness raising campaign and develop awareness raising materials to send to the field on a regular basis. ➤ If the material is not changed on a regular basis, beneficiaries don't pay attention to the messages on the posters, t-shirts, etc. anymore. ➤ Remember that before you launch your orientation or information campaigns, test your messages with a variety of stakeholders - including vulnerable populations - to ensure that the messages 	<ul style="list-style-type: none"> • Several awareness raising tools can be found on the IASC Task Force on PSEA's website, under Thematic Area/Awareness Raising for Local Communities


	are culturally appropriate	
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5. EFFECTIVE COMMUNITY BASED COMPLAINTS MECHANISMS (CBCM)

5. Effective community based complaints mechanisms (CBCM)		
Indicator (MOS)	How to use the performance indicator	Current practice and examples
<p>The HQ urges its field offices to participate in community-based complaint mechanisms that are jointly developed and implemented by the aid community adapted to the specific locations.</p>	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ Community-based complaints mechanisms provide the means by which beneficiaries can share SEA concerns. These mechanisms should be safe, confidential, transparent, and accessible. Such mechanism shall be reasonably accessible to beneficiaries, including children and those facing particular vulnerabilities, regardless of age, sex, physical ability or level of literacy. The Community-based Complaint referral mechanism shall include the ability to make anonymous complaints. ➤ The experience of certain CBCMS suggests that interagency (joint) community-based mechanisms facilitates and encourages reporting by beneficiaries, or even whistle blowing by agency personnel because of their interagency aspect. ➤ Whether you implement your organization's own community-based complaints mechanism or decide to establish an interagency one, when 	<ul style="list-style-type: none"> • IRC/CCSDPT has Interagency Protocols for the Prevention of Sexual Abuse and Exploitation by Humanitarian Workers includes reference to CBCM, They also have PSEA Awareness-raising Outreach Record Template and CBCM mechanism description. <div style="text-align: center;">  <p>CCSDPT Interagency Protocols.rar</p> </div> <ul style="list-style-type: none"> • The IASC Task Force on PSEA developed a Compendium of Practices on Community-Based Complaints Mechanisms. • The ECHA/ECPS UN and NGO Task Force's draft Guidelines on Setting up a Community Based Complaints • Guidelines on Setting Up a Community Based Complaints Mechanism Regarding Sexual Exploitation and Abuse by UN and non-UN Personnel • WorldVision has developed a resource guide "Complaint and Response Mechanism". • There are many guidelines available on community consultation, such as The UNHCR Tool for Participatory Assessment.

	<p>possible, try to build them upon already existing community-based complaints mechanism.</p> <ul style="list-style-type: none"> ➤ Prior to establishing a community-based complaints mechanism, it is important: <ul style="list-style-type: none"> ✓ To have clear internal complaints procedures ✓ To have your staff trained on your complaints procedures and PSEA to ensure that beneficiaries' complaints be adequately answered. ➤ Here are the steps to take to establish an interagency community-based complaints mechanism: <ol style="list-style-type: none"> 1. Consultation with agencies and government <ul style="list-style-type: none"> ✓ Buy-in / agreement from participating agencies and participation of agency PSEA focal points 2. Project Steering Committee established <ul style="list-style-type: none"> ✓ Establish a steering committee (PSC) 3. Consultation with beneficiaries and CBOs <ul style="list-style-type: none"> ✓ Identify channel, preferably already existing channels ✓ Identify barriers for reporting ✓ Identify messaging channels, 	
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	<p>preferably exciting channels</p> <ul style="list-style-type: none"> ✓ The only way to know how beneficiaries would be most comfortable reporting SEA is to ask them: engage diverse groups of beneficiaries to ensure that your complaints mechanisms and messaging address differences in: * language * age * sex * sexual orientation * caste * physical ability * faith * level of literacy * culture * ✓ It is essential that “women and children who have an impairment or disability...have a means of being heard and that lack of mobility or verbal communication does not exclude them.” ✓ Also ensure that boys including adolescent boys are considered when developing complaints mechanisms, as they can also be victims of SEA. <ol style="list-style-type: none"> 4. Establish Interagency protocols and/or Clearinghouse mandate 5. Establish common standards and/or Code of Conduct 6. Establish an agency PSEA by UN and non-UN related personnel coordination network 	
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	<p>7. Development and roll out of messaging / awareness-raising campaign</p> <p>8. Conduct a KAP surveying at 6-9 months</p> <p>9. Analysis of complaints</p> <p>➤ Make sure to manage beneficiaries' expectations from the beginning as this can become a major challenge.</p>	
<p>There is guidance provided to the field on how to design the CBCM to ensure it is adapted to the cultural context with focus on community participation.</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <p>➤ There is no “one size fits all” approach to SEA. This means that community-based complaints mechanism must be adapted to local context. From country to country – and between communities within the same country – there will be different barriers to reporting.</p> <p>✓ The only way to know how beneficiaries would be most comfortable reporting SEA is to ask them: engage beneficiaries to ensure that your complaints mechanisms and messaging address differences in: * language * age * sex * sexual orientation * caste * physical ability * faith * level of literacy * culture *</p>	<ul style="list-style-type: none"> • There are draft “Guidelines on Setting up a Community Based Complaints Mechanism Regarding Sexual Exploitation and Abuse by UN and non-UN Personnel” • Concern Worldwide has developed internal guideline for their staff on setting up community-based complaints mechanism: <div style="text-align: center;">  <p>1. Concern CRM GUIDE February 2012</p> </div>
<p>There is a mechanism for</p>	<p><i>To meet the requirement of this indicator there</i></p>	<p>No examples were found.</p>


<p>monitoring and review of the complaint mechanism.</p>	<p>should be:</p> <ul style="list-style-type: none"> ➤ The only way to know if your internal complaints mechanism works and is adapted to the local context, is to develop a monitoring and reviewing system. Monitoring & Evaluation specialist may be able to assist you in developing a mechanism. ➤ For the complaints mechanism for beneficiaries, there should be a focus on community consultation. Especially, different groups should be consulted to ensure that they actually feel comfortable using the mechanism. 	
<p>The organisation has written guidance on the provision of victim assistance.</p>	<p>To meet the requirement of this indicator there should be⁴:</p> <ul style="list-style-type: none"> ➤ SEA Victim Assistance Mechanisms (SEA/VAMs) help persons victimized by sexual exploitation and abuse to access the services they need as a result of such abuse. ➤ Each country will develop its own SEA/VAM to assist survivors according to its local context. The mechanisms of assistance may vary between and even within countries, however there are a number of fixed 	<ul style="list-style-type: none"> • There is an inter-agency “SEA Victim Assistance Guide” on Establishing Country-Based Mechanisms for Assisting Victims of Sexual Exploitation and Abuse by UN/NGO/IGO Staff and Related Personnel (Produced by the ECHA/ECPS UN and NGO Task Force on Protection from Sexual Exploitation and Abuse, April 2009) • There is also a victim assistance strategy that was adopted by the General Assembly. This strategy is available on the PSEA Task Force website in several languages.

⁴ The provided guidance that follows comes from the [SEA Victim Assistance Guide](#)


	<p>characteristics and components shared by all SEA/VAMs. The SEA Victim Assistance Guide summarizes these characteristics and components.</p> <ul style="list-style-type: none">➤ To provide assistance to a victim, you will need funding. A dedicated budget needs to accompany the victim assistance strategy.	
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6. EFFECTIVE RECRUITMENT AND PERFORMANCE MANAGEMENT

6. Effective recruitment and performance management		
Indicator (MOS)	How to use the performance indicator	Current practice and examples
The organisation makes sure that all candidates are required to sign the code of conduct before being offered a contract.	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ All new hires have to sign the Code of Conduct when signing their contract, and the same applies for interns, consultants, volunteers or anyone working for the organization. 	<ul style="list-style-type: none"> • All IOM staff members are requested to sign the Standards of Conduct when signing their contract with IOM. • IRC/CCSDPT has a 'Human Resource Working Group PSAE Presentation and Exercises' • In UNHCR, all contracts are signed simultaneously with the Code of Conduct. If the staff member refuses to sign the CoC, the reasons for this must be elaborated in writing. The CoC is not legally binding but is an important moral guide. In addition, all new recruits have to sign off on the Code of Conduct, and the same applies for interns, consultants etc. • All IMC staff are required to sign the Code of Conduct upon being hired and to re-sign it every year after. Internal auditors will check that this is done.
Each organisation commits to improving its system of reference checking and vetting for former misconduct.	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ Your organization's recruitment policy should include reference check, including criminal ones. ➤ Your organization should also keep employees' files updated to avoid hiring persons sanctioned for misconduct, particularly of a sexual nature. 	<ul style="list-style-type: none"> • Many agencies have a recruitment policy which includes criminal reference check before making a job offer.

<p>Supervision and performance appraisals include adherence to participation in Code of Conduct trainings (or similar) that includes PSEA.</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ Your organization should include PSEA in the Staff Evaluation System for all staff. By integrating adherence to participation in Code of Conduct trainings that includes PSEA you will strengthen the importance of the issue for the organization, develop a sense of responsibility and ensure that non-attendance in mandatory training will affect their performance appraisals. 	<ul style="list-style-type: none"> • IOM has included PSEA in the Staff Evaluation System for all staff from P3 to D2 and NOC-NOD and G7. • In UNHCR’s Performance management, all staff are assessed against the Core Values and Core Competencies, in which core value INTEGRITY has one of the measuring indicator "demonstrates the values and principles of UNHCR in daily activities and behaviors as reflected in the Code of Conduct"
<p>Performance appraisals for Senior Management include the adherence to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of the ST/SGB/2003/13 or code of conduct.</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ Managers at all levels have a special responsibility to create and maintain an environment free of SEA. Managers should be evaluated in their performance appraisal on their performance in creating and maintaining such an environment. Without formal evaluation, some managers will create and maintain such an environment while others won’t. 	<ul style="list-style-type: none"> • Concern Worldwide has a section dedicated to PSEA in their staff performance appraisal forms: <div style="text-align: center;">  <p>Concern Worldwide_appraisal f</p> </div>

7. EFFECTIVE AND COMPREHENSIVE MECHANISMS ARE ESTABLISHED TO ENSURE AWARENESS-RAISING OF SEA AMONGST PERSONNEL

7. Effective and comprehensive mechanisms are established to ensure awareness-raising of SEA amongst personnel		
Indicator (MOS)	How to use the performance indicator	Current practice and examples
Staff receives annual refresher training on the standards of conduct, learn about the mechanism to file complaints and reports of misconduct and the implications of breaching these standards.	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ Providing annual refresher training to all staff on your organization’s Code of Conduct will help reinforcing your organization’s standards and prevent breach of these standards. ➤ Either as individual training or as part of the Code of Conduct training, staff should be trained annually on PSEA and ways to report. Staff are often concern about confidentiality and how their report will be handled. Make sure to specifically address these points during training. ➤ In addition to the annual refresher training, different materials can be used and develop to raise-awareness throughout the year such as posters, desktop calendars. 	<ul style="list-style-type: none"> • IRC/CCSDPT has ‘PSEA staff training slides and exercises’  PSEA Training Materials from Thailar • UNDP has reached about 5000 staff members of its work force with a global awareness raising campaign for staff and related personnel. Campaign materials included facilitators guide, PPT, movie “To Serve with Pride” and evaluation tools. • IOM has conducted in 2011-2012 a series of awareness-raising sessions on PSEA covering 7000 staff worldwide. A training package including a facilitator manual was developed for this purpose. Many Senior Managers participated as facilitators of these sessions. The training includes information on reporting process, disciplinary measures and consequences on the victims, community and organization. • IMC conducts annual refresher training specifically on for all staff around the world. Each year, their staff resigns their code of conduct. IMC have developed several documents explaining what SEA and what IMC’s complaints mechanism is. These documents are

		<p>displayed in all their offices and available to staff. In addition, HQ has distributed awareness-raising material for all staff.</p> <ul style="list-style-type: none"> • Each time an IMC HQ employee travels to the field, s/he is required to demonstrate understanding of the SEA policy by re-taking the on-line SEA quiz (not to exceed taking the test once/year).
<p>Training on misconduct (specifically mentioning SEA) forms part of the induction process.</p>	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ Training on PSEA should be part of the new hires' induction training. This will set the organization's standards from the beginning. ➤ Staff should be trained annually on PSEA and ways to report. Staff are often concern about confidentiality and how their complaint will be handled. Make sure to specifically address these points during training. 	<ul style="list-style-type: none"> • Several agencies have an online mandatory training for new hires that includes reference to their PSEA policy. • IMC conducts a two-hour PSEA training for new hires that includes information on how to file a complaint. • IOM New hires required to attend new employee orientation which covers code of ethics and business conduct – new hires review several 'real life' situations and identify policy(ies) involved and appropriate action to address the issue(s).
<p>Staff members are aware of their obligation to report SEA/misconduct and are aware that there is a policy for Protection from retaliation in</p>	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ All PSEA training should reinforce the notion that it is mandatory to report any suspicions related to a SEA case. 	<ul style="list-style-type: none"> • UNDP has successfully mainstreamed PSEA in their online mandatory Ethics training for staff and in their induction packages to ensure all staff and related personnel are made aware of PSEA obligations and standards of conduct. • IMC's Code of Conduct, Complaints mechanism


<p>place.</p>	<ul style="list-style-type: none"> ➤ Staff are often concerned about confidentiality and how their complaint will be handled. Make sure to specifically address these points during training. ➤ During training, mention your organization whistleblower policy and how people who report will be protected from retaliation as long as their complaint is not done maliciously. ➤ Mention also that confidentiality is better insured if people choose one channel to report and instead of report through different channels. Mention that your agency will do its best to maximise confidentiality but cannot guaranty it at 100%. 	<p>procedures and referral form are displayed in all their offices including field site offices and available to staff. It is specifically mention to staff during training and on the referral form that they should only choose one channel to report.</p>
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8. INTERNAL COMPLAINTS AND INVESTIGATION PROCEDURES ARE IN PLACE

8. Internal complaints and investigation procedures are in place		
Indicator (MOS)	How to use the performance indicator	Current practice and examples
Written procedures on complaints/reports handling from staff members or beneficiaries are in place.	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ It is important for your organisation to have clear written complaints/reporting procedures in place and to let staff know about it. Without clear procedures in place, it is unlikely that staff will report cases and / or for the complaint / report to be handled. Chances for confidentiality to be lost are also higher without clear reporting guidelines. 	<ul style="list-style-type: none"> • IRC/CCSDPT have a number of useful tools for complaints handling including: <ul style="list-style-type: none"> - Incident Report Forms (IRF) – contained in CCSDPT Interagency Protocols • UNDP has written procedures on how personnel can/should make a complaint and these have a good level of detail. • Building Safer Organizations has released guidelines that the IASC Task Force on PSEA endorsed.
Staff members are informed on a regular basis of how to file a complaint/report and the procedures for handling these.	<p>To meet the requirement of this indicator there should be:</p> <ul style="list-style-type: none"> ➤ It is very easy to forget the complaint / reporting procedures of an organization. For this reason, through induction training and annual refresher trainings, it is important to let staff know what the complaint/reporting procedures are. It is also important to remind staff that it's mandatory to report SEA (including suspicions of SEA). ➤ Staff who are well-aware of the reporting procedures and trust them are more likely 	<ul style="list-style-type: none"> • All IOM staff receive a yearly face-to-face information on PSEA including the reporting process, disciplinary measures and consequences on the victims, community and organization. • As part of their management course which is a one-time event, UNDP managers receive instructions on what to do once a complaint is received. • IMC staff are trained once a year as part of their PSEA refresher training on complaint / report procedures. A 4-member SEA Case Team, comprising senior managers from different departments, is in place to receive complaints, oversee investigations, and make final decisions on outcomes. • UNHCR sends to all staff on an annual basis a report

	<p>to report cases.</p> <ul style="list-style-type: none"> ➤ One way to inspire trust in the system is for the Director of your organization to send an organization-wide report at the end of each calendar year about SEA complaints and how these were handled by the organization. This report should not reveal any confidential information or hints that could reveal the identity of the complainant, victim or perpetrator. 	<p>about SEA cases that took place during the year. The report gives the professional grade of the perpetrator, what sanction was given and the name of the country.</p> <ul style="list-style-type: none"> • UN agencies and IOM send a yearly organization-wide report to their staff worldwide about SEA complaints and how these were handled by the organization.
<p>Standard investigation operating procedures or equivalent issued and used to guide investigation practice.</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ Your organization should have clear written standard investigation procedures in place that will be used to guide the investigation. This will ensure that your investigations follow a protocol, respect due process and are well-run. ➤ Clear investigation protocol will ensure that safety and reputation of the victim, complainant and perpetrator as well as that the organization’s reputation is upheld. ➤ An investigation should be managed by someone at HQ and two trained investigators, should be deployed in the field. 	<ul style="list-style-type: none"> • SCUS has an ‘investigation toolkit’ that is sent to anyone investigating a complaint/allegation; toolkit includes instructions on how to run investigation and prepare a report. • UNDP has investigations procedures that are explicit about confidentiality, who should receive complaints, timelines, communication of results, and required HQ response. These procedures are available online to all staff and beneficiaries alike. • InterAction has a Management of SEA Investigations elearning training. • HAP offers two in-person trainings on investigation of SEA cases.

<p>Investigations are undertaken by experienced and qualified professionals who are also trained on sensitive investigations such as allegations of SEA.</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ Only trained investigators who know how to handle SEA investigations should undertake investigations. SEA investigations are more sensitive than most other type of investigations and the specificity of their nature should be taken into account. Investigators who are not trained to conduct SEA investigations or not trained enough, may cause more damage than good. ➤ Investigators should be regularly trained on how to conduct an SEA investigation. They should have the opportunity to practice their skills through trainings involving case studies. ➤ An investigation should be managed by someone at HQ and two trained investigations should be deployed in the field. ➤ Cases involving children should be handled by investigators with special training. 	<ul style="list-style-type: none"> • Concern Worldwide / International Medical Corps / IRC / Oxfam UK have teams of trained investigators in various regions worldwide who are available to conduct internal SEA investigations. • HAP International offers trainings of investigators focusing on SEA investigations. • Within UNDP all investigations are managed by professional investigators of the Office of Audit and Investigations. • IRC/CCSDPT Investigation Team Terms of Reference – <u>contained in CCSDPT Interagency Protocols</u>
<p>Investigations are commenced within 3 months and information about out-come is</p>	<p><i>To meet the requirement of this indicator there should be:</i></p> <ul style="list-style-type: none"> ➤ The investigation policy should include some language on when the investigation 	<ul style="list-style-type: none"> • IMC: Investigation must be finished within 28 days from the day the SEA case team decided an investigation must take place. At the end of the investigation, feedback must be given to complainant.

<p>shared with the complainant.</p>	<p>should be commenced.</p> <ul style="list-style-type: none"> ➤ Feedback to the complainant at the end of the investigation is very important. It will ensure that the complainant knows that investigation was conducted. Feedback will also make the complainant trust the organization’s complaints handling system. Feedback should not reveal confidential information but the complainant has the right to know how the case was handled by the organization. ➤ One way to inspire trust in the system is for the Director of your organization to send an organization-wide report at the end of each calendar year about SEA complaints and how these were handled by the organization. This report should not reveal any confidential information or hints that could reveal the identity of the complainant, victim or perpetrator. ➤ Each investigation should be carefully recorded as part of a database or tracking system. 	<p>If the investigation goes beyond 28 days, the complainant must be informed that there will be some delay in providing feedback.</p> <ul style="list-style-type: none"> • IRC/CCSDPT Case Tracking Sheet <div style="text-align: center;">  <p>SEA Case Tracking Sheet.doc.docx</p> </div>
<p>Substantiated complaints have resulted in either disciplinary</p>	<p><i>To meet the requirement of this indicator there should be:</i></p>	

<p>action or contractual consequences and, if not, the entity is able to justify why not.</p>	<ul style="list-style-type: none"> ➤ If a complaint is substantiated, it is the responsibility of your organization to take the necessary steps for disciplinary action. ➤ During recruitment processes, ensure that background checks are undertaken for any history of SEA. ➤ In case of SEA substantiated after an investigation, include the disciplinary letter in the staff member's file and introduce a monitoring system to avoid the rehiring of SEA perpetrators. ➤ If allowed by local law, provide adequate information to other potential employers when approached for a reference check on a former staff member dismissed for substantiated SEA. 	
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