



A GLOBAL NGO NETWORK
FOR PRINCIPLED AND EFFECTIVE
HUMANITARIAN ACTION

The Long Run to Protection Against Sexual Exploitation and Abuse (PSEA)

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June 2018

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EXECUTIVE SUMMARY

Acts of sexual abuse and exploitation (SEA), including sexual harassment at work place, are punished by law. However, such acts continue to occur in all settings, including by peacekeeping, humanitarian and development actors. Aware of the risks, these actors are increasingly strengthening their internal systems and measures to protect against sexual abuse and exploitation (PSEA), first the population they are working in, but also at work place. But are the efforts going in the right direction? Are there areas where further investment is needed to address current challenge and to transform 'the zero tolerance' from a policy on paper to a reality for all, including the most vulnerable?

The current paper aims to contribute to such a reflection by sharing on the experiences of the members of the [International Council of Voluntary Associations](#) (ICVA). For the purposes of the paper, a desk review and semi-structured interviews were conducted with national and international NGO members, as well as with few NGO Fora, representing a substantial constituency of actors at local and national level. Special attention was given to national and local actors work on PSEA to link also with the localisation commitments following the [World Humanitarian Summit](#) and the [Grand Bargain](#).

The findings of the paper show a renewed commitment on PSEA, especially at the international level. Progress has been achieved at the policy level, with all the organisations interviewed covering PSEA through codes of conducts, in recruitment processes and complaint mechanisms. Investments in institutional capacity building was also ongoing. International NGOs were investing further resources on PSEA internally and building knowledge and capacities of staff in induction phase and through refreshment courses. All the NGOs had benefitted through standard development and referred in specific to the certification process and benchmarking against the Core Humanitarian Standards. Training and tools developed by organisations such as [InterAction](#), [ICVA](#) or the more extended guidance and work of [CHS Alliance](#), [Keeping Children Safe](#) and the [IASC Task Force on PSEA](#) were all considered as very useful by the NGOs interviewed. The development of the national hubs and networks on PSEA was also highlighted as a strong promising practice, because it allows for analysis and understanding of the gaps, and follow up action with local and national actors, as well as mobilisation and sharing of resources at the benefit of all.

Despite these existing good practices, a large number of concerns and challenges was also shared by the NGOs interviewed. The main gap identified by this paper is the under-reporting, linked to two main causes:

- A) The PSEA developing as a silo in itself, focussing a lot on internal reputational risk management and not sufficiently on addressing external and internal structural factors that favour SEA and its impunity. Factors highlighted include gender and power relations; violence, especially against women and children; and the top down nature of relations and lack of trust characterising the sector.
- B) The lack of protection and support services for victims. In fact, many of the NGOs interviewed emphasised not only the challenge to discuss SEA with the communities, but also that victims have nothing to gain from coming forward. While, in many contexts specialised services needed are either non-existing or too limited in time and quality, current PSEA commitments and investments are still not sufficiently addressing the victims' need.

As more can and should be done, all the NGOs interviewed welcome the current momentum in enhancing PSEA measures. However, to ensure that this does not become another missed opportunity, their call upon all actors to:

1. **Strengthen engagement in prevention;**
2. **Enhance fight against inequality and promote horizontal relations;**
3. **Prioritise victim protection and support;**
4. **Mitigate negative impact;**
5. **Enhance focus on national and local level;**
6. **Ensure long term commitment and investment.**

I. INTRODUCTION

a) Background to PSEA

International and national law protect both children and adults against sexual exploitation and abuse (SEA). While child SEA is well defined by international law¹, there is no internationally agreed definition of sexual abuse and exploitation of adults. However, by looking at definitions at national level, it is argued that sexual abuse and exploitation occurs when:

*'An individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive another person into an act of sexual nature or of sexual intent in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.'*²

Despite SEA being generally condemned and prohibited in law, acts of SEA continue to occur, often with impunity, in all settings, including in peace-building efforts and delivery of humanitarian and development aid. In fact, such settings are usually characterised by a high vulnerability of the population and large risks of human rights violations, including risks of gender-based violence, sexual exploitation and abuse. Evidence shows that peace, humanitarian and development actors³, both international and national, are not immune to such acts. Individuals working for them can be among perpetrators, responsible for SEA within working environment but also against population they are working with and expected to protect and assist. Thus, in addition to be prone to fall under criminal laws, SEA acts carried out by peace, humanitarian and development staff towards members of the population, constitute also a breach of principled intervention. SEA acts violate the principles of humanity, protection, do not harm and accountability.

It is based on these principles, founded on international and national laws, that peace, development and humanitarian actors commit to a zero tolerance towards acts of SEA and put in place measures to prevent and protect against such acts, when committed by their own staff (hereinafter protection against sexual exploitation and abuse- PSEA). [The Core Humanitarian Standards](#) mainstream PSEA and three commitments specifically refer to PSEA, namely:

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.*

b) The scope of this paper and ICVA

But how is the PSEA agenda progressing today in the peace, humanitarian and development nexus? The question is very much at the heart of many involved actors, who call for further action and measures to enhance PSEA. For these actions and measures to be efficient, they have to build upon evidence and lessons learnt so far. The ongoing PSEA work has to be deeply analysed, identifying existing challenges and reasons thereof as well as good practices and elements of success.

The current paper aims to contribute to such a reflection by sharing on the experiences of members of the [International Council of Voluntary Associations](#) (ICVA). ICVA is a network for collaboration and

¹ See UN Convention on the Rights of the Child and its Optional Protocol on the sale of children, child prostitution and child pornography

² See also the definitions in the [PSEA Implementation Quick Reference Handbook](#), CHS Alliance, 2017

³ The reference to peace, humanitarian and development actors is done in the context of 'the New Way of the Working' promoted by the UN GS and MS. See for more :The New Way of Working Examined: An ICVA briefing paper at:

https://www.icvanetwork.org/system/files/versions/ICVA_NWoW_Briefing_paper.pdf

coordination among over 100 NGOs members and other humanitarian actors. Though initially linked to humanitarian interventions, many of ICVA members, as well as the network itself work across the divisions between humanitarian and development, by combining responses to short-term needs with long term solutions. Since collaboration and coordination is considered as a mean by the members to improve the lives of communities they work with, the network has a significant role to play also in PSEA coordination and collaboration. In the past, ICVA has conducted [capacity building](#) on PSEA, while its regional hubs periodically bring together humanitarian practitioners to critically analyze collective practice around the quality of services and accountability to affected populations.

In March 2018, ICVA General Assembly re-affirmed accountability towards the people its members serve, partners, supporters and the public at large. It also mandated the secretariat to document and voice the PSEA work, challenges and good practices existing among members and identify recommendations to feed efforts at international, regional and national level. In further discussing the mandate, it was agreed to focus specifically in national and local NGOs. Localisation is one of the core commitments of [World Humanitarian Summit](#) and the [Grand Bargain](#), thus efforts to strengthen PSEA build upon local knowledge and capacities.

The Grand Bargain

states that “Humanitarian action should be as local as possible and as international as necessary”.

Localisation highlights the importance of local knowledge, capacities and action and aims to actively strengthen these by changing funding flows, devolving decision-making, strengthening partnerships and increasing participation. Localization is based on the idea of subsidiarity, which calls for solutions to be derived from those affected, with the value of every additional layer of assistance measured in terms of its positive impact on existing capacities, structures and needs. It can alternatively be seen as an exercise in identifying comparative advantages and working wherever possible to shift these advantages towards local actors.

Localization Examined: An ICVA Briefing Paper, July 2018 – To be published

c) Methodology

This paper follows upon the ICVA 2018 General Assembly decision related to PSEA and aims to document and voice the PSEA work of its members, with specific attention to local and national NGO members. Due to the limit time available, the paper is far from comprehensive and should be considered as a process-starter.

The paper is based on semi-structured interviews and analysis of current PSEA measures with 12 ICVA members. Out of them, four represent networks, bringing together a substantial constituency of local and national NGOs. Three are ICVA national NGO members and five international NGOs members with numerous partnership agreements with local and national organisations. Five additional interviews were conducted with the ICVA executive director and regional representatives. Some of ICVA members shared additional written information for this paper, including examples of Codes of Conduct. A large number of documents related to PSEA, localisation and standards were also consulted, and in specific the work of the [Inter-Agency Standing Committee \(IASC\) Task Team on Accountability to Affected Populations \(AAP\) and Protection from Sexual Exploitation and Abuse \(AAP/PSEA\)](#).

The interviews did not aim to analyse in depth the PSEA system of the ICVA members. However, some useful information came up during the interviews and is briefly summarised in the paper. The paper focuses then on the challenges as identified by the members and few ongoing promising. The paper concludes with a number of recommendations for follow up by ICVA both in terms of program support to members and advocacy.

II. FINDINGS

a) Systems in place

All the organisations interviewed have PSEA systems and measures in place, though the level of investments varies among members. The Code of Conduct was mentioned by all as an internal source of **written guidelines** for staff on **appropriate/expected standards of behaviour** at work, towards other staff, partners and, first of all, towards population with whom the organisation works with. International NGOs referred also to agreements with various donors, which in their view contained a number of **PSEA related obligations**. Few of them had additional internal policies dedicated to PSEA and/or child safeguarding (especially child rights organisations).

National NGO members and networks also referred to national legislation as a main source of PSEA. Moreover, they also emphasised on the role of cultural norms and religion as a source of unwritten rules on appropriate behaviour. In few cases of national NGOs, the Code of Conduct was generally formulated and did not prohibit in specific SEA. The representatives from national NGO networks also recognised that at national and local level, not all NGOs have a Code of Conduct. There is a high risk that especially small NGOs, but in some contexts also middle-size NGOs do not have a Code of Conduct.

It was also highlighted that when working in partnership with an international agency and regardless of whether the national/local NGO had its own Code of Conduct or not, in many occasions, the international partner would ask the NGO program staff to sign also its own Code of Conduct. As an NGO could implement simultaneously various programs supported by different partners, its staff might become bound by various Codes of Conducts and with differences in formulations.

Moreover, there was agreement that the Code of Conduct was in itself not sufficient and adequate resources had to be invested in institutional capacity building. Examples of training sessions on the Code of Conduct or regular refreshment obligatory tests for staff were mentioned, especially by the international NGOs. However, on institutional capacity building, all members interviewed agreed that more needs to be done, internally and with partners. One international NGO stated that their approach was to assist the national and local partners to come up with their own Code of Conduct and build the institutional capacities to implement it. However, this international NGO recognised that it did not always have the required resources to accompany national and local partners in the process.

There was an overall and strong agreement on the need to invest further in prevention. Most of the organisations interviewed had a very broad understanding of prevention, including strengthening protection systems at national level, promoting integrity at work and an open organisational culture. Recruitment processes were mentioned as needed to have strong checks in place. Few of the members reflect commitment to PSEA in jobs' adverts. During recruitment, both national and international NGO members inquire on the integrity of the candidates during references' checks. However, some of them would not ask in specific on SEA related risks, while others, especially the international NGOs, would increasingly require also a criminal record excerpt as part of the process.

Many national NGOs emphasised on the fact that being rooted within the community, helped to select and preserve the integrity of the staff. One national NGO network highlighted that for many NGO members, the majority of the staff is female, which also, in her view, reduced risks of SEA by staff. One international NGO emphasised on the need to invest in a healthy working environment, including guaranteeing regular working hours and staff holidays, also as a mean to prevent inappropriate behaviour by staff members.

All the organisations interviewed had a complaint mechanism in place, which was in few cases, not specific on SEA. Some of the organisations would also have specific visuals to explain the complaint mechanism as well as accepted and unaccepted behaviour. Focal points were appointed to deal with complaints, though in one case it was mentioned that the focal point would be appointed ad hoc. Senior executives of national NGOs and networks interviewed, recognised that ultimate responsibility for ensuring PSEA rests with them and highlighted the importance of leadership's role in promoting the

implementation of complaint mechanisms also outside PSEA. Organisations were making efforts to promote the complaint mechanism within the communities they are working with.

As for the capacity to investigate, all organisations felt capable of responding to complaints but for many national and local NGOs, this would be done through internal capacities, rather than external independent investigation. Finding the right investigator was not mentioned as a specific concern, though some referred again to the need for adequate resources. Two NGO shared in specific concerns on the increased expectations regarding complaint mechanisms formats, which in their views could be afforded only by the large international NGOs. All organisations spoke about under-reporting as an issue and though the number of PSEA related complaints was not in specific asked during the interviews, few NGOs mentioned that so far they have had no such complaints.

Follow up of complaints was also discussed. Once an allegation was proven, the contract would be terminated. In one specific case, reference was however done to national legislation, where the contract could be terminated only if the allegations were proven before a national court of law. In the meantime, the person alleged could be suspended from his/her job. It was in this aspect that a national NGO emphasised on the need for international NGOs to better understand national context and legislation, including labour laws of the countries they work in.

Different opinions existed on reporting to national authorities. While all members interviewed recognised their accountability to the affected population, for some of them this was quite different from accountability to national or local authorities. NGOs elaborated that in some of the contexts they work, the rule of law is extremely weak, authorities might not have control on the territory, and some of them might be corrupt or might even be responsible for large scale and grave human rights violations. The international NGOs interviewed mentioned thus that the decision to report to national authorities would be made rather on a case by case basis and in general they did not feel at ease with that. National NGOs on the other hand were more inclined towards reporting of the case to the authorities, though one NGO mentioned that if the staff belonged to a group facing real risks of discrimination (i.e. ethnic minority, refugee, migrant) in access and delivery of justice, they might decide not to report the case to the authorities.

b) Challenges and risks

Victims centred protection and support: One of the main concerns expressed during the interviews regarded protection and support for victims. For the NGOs this had to be the first priority once a complaint was reported. Sexual abuse and exploitation has a profound impact on victims. The NGOs interviewed highlighted that acts of SEA do not cause only physical injury, but also a range of sexual and reproductive health problems, with both immediate and long-term consequences. Sexual abuse and exploitation also affect the mental and social wellbeing of victims; individuals may be stigmatized and ostracized by their families and others. Death might also result from SEA, among others because of suicide and HIV infection.

As all the organisations interviewed are either providing services directly or through members/partners, they all stated that the victim would have access to these services as well as be referred to other organisations as per need. However, it was recognised that many of the specialised services that might be required by the victim are lacking at local and national level. In many contexts, the services would also be run by NGOs, which means that the services are of a project bound duration, contrary to the long-term needs of the victims for protection and support.

Moreover, as shown by the interviews, the current thinking was more in terms of protection and support and less in terms of redress and compensation, to which victims should also be entitled. It is however recognised that for the NGO concerned these issues are sensitive and difficult to be handled properly outside a court of law verdict.

Even the United Nations (UN) took time to establish a Trust Fund in Support of Victims of Sexual Exploitation and Abuse. The Fund, established in 2016, is aimed at, among other things, engaging in community outreach and addressing service gaps in the provision of assistance and support for complainants, victims and children born as a result of sexual exploitation and abuse. In August 2017, the UN Secretary-General appointed also system-wide Victims' Rights Advocate at UN Headquarters to ensure that the UN system provides tangible and sustained assistance to the victims of sexual exploitation and abuse. The Advocate will work with government institutions, civil society, and national human rights organizations to build support networks and to help ensure that the full effect of local laws, including remedies for victims, are brought to bear.⁴ Some of the NGOs interviewed were however not families with these victim centred mechanisms of UN, which are also meant to apply only in case the act of SEA has been committed by UN related personnel (including consultants, volunteers, individual contractors, personnel of partner organizations, experts on mission and peacekeepers, both civilian and uniformed personnel⁵)

Gender inequality: The relation between gender and violence is complex. However, evidence shows that the gender inequalities increase the risk of violence by men against women and inhibit the ability of those affected to seek protection. Studies show that among the factors increasing the risk of a man committing acts of SEA against a woman are those related to attitudes and beliefs, as well as behaviour arising from situations and social conditions that provide opportunities and support for abuse. In many contexts culture norms and religion, but also implementation of the laws by the authorities continue to favour a predominant position of the men in society and support beliefs such as that sexual intercourse is a man's right, that women and girls are responsible for keeping men's sexual urges at bay or that rape is a sign of masculinity. This leads then to impunity for acts of SEA committed by men, while forcing women and children to continue suffering in silence.⁶

One NGO member referred to a very recent and unfortunately common case, outside the context of NGOs, where a woman alleged her husband committed domestic violence and filed the case with the police. While no measures were taken against the husband, he divorced the women who ended up being blamed and pushed away by the community and her own family. As the NGO member further elaborated, '*the state-run shelters are often unprotected and abusive. We just think providing legal help is protection but the fact is that post abuse rehabilitation is the great issue stopping women to voice against abuses.*' Because of the gender inequalities and lack of services, throughout the world victims fear they have too much to lose and too little to gain by reporting.

Power relations: Linked to gender inequalities, but going further than that, most of the organisations interviewed linked the under-reporting with unbalanced power relations at all levels. According to the interviews, the stronger the power imbalance, the bigger the risk that the victim would not speak out and/or be listened to. As it was emphasised in one of the interviews, the victims fear that there will be not only direct negative consequence on them, but also on the family and the entire community. Communities and their members fear that, if they speak out, they would end up further marginalised. In fact, it was pointed out how after recent public disclosure of SEA cases by an NGO's staff, and despite the immediate mitigating measures taken by the NGO, some donors suspended funds without clear conditions, which also meant less resources and support provided to the communities in need.

While many NGOs are engaged in promoting complaint mechanisms within the communities, it was recognised that such efforts should be long term and require building relations of trust with the communities.

Trust was mentioned often during the interviews also in terms of internal organisational dynamics. Some of the main actors of the sector were considered as being highly hierarchical internally, which makes it

⁴ See for more on UN efforts on victims' protection and support: <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/victim-assistance>

⁵ See UN Comprehensive Strategy on Assistance and Support to Victims of Sexual Exploitation and Abuse by United Nations Staff and Related Personnel, 2007

⁶ Understanding and addressing violence against women, WHO, 2012

difficult to truly promote an open culture of reporting and discussing SEA concerns and allegations. The unequal power relations between national and international staff within the same organisation were another challenge mentioned, while it was also recognised that some national and local NGOs function centred on the leader and his/ her behaviour as well as that of 'his/her friends' could hardly be challenged by other staff. One national NGO network interviewed asked for a more prominent role of the State, including a complaint mechanism run by the State for all service providers in the country, including NGOs.

Concerns were expressed on relations within the sector being in general considered quite vertical and top-down and there was fear that increased funding gaps might lead to even more top down decisions. One of the actors interviewed referred to the shrinking space for negotiations with donors and that there were more and more donors' policy requirements to comply with. Already in 2013, for example, a study commissioned by the UN Office for the Coordination of Humanitarian Affairs (OCHA) and Norwegian Refugee Council discussed the impact of donor counterterrorism measures on principled humanitarian action.⁷ Since then, similar requirements have increased involving costs, that are too high even for large international NGOs and cannot be absorbed by national and local actors. Another international NGO also expressed concerns on the administrative processes required and the costs involved, emphasising that 'if we want to continue working with national and local NGOs, we have to reduce all this'. [Less Paper More Aid](#), which is an initiative carried out by NGOs to reduce the burden of donor conditions on aid agencies has conducted research showing that donor reporting, due diligence and audit posed the most challenges for NGOs.

Achieve by 2020 a global, aggregated target of at least 25 per cent of humanitarian funding to local and national responders as directly as possible to improve outcomes for affected people and reduce transaction costs

The Grand Bargain

The national NGOs and networks on their side, emphasised on the need to engage in more honest terms on the issue by bringing the discussion on PSEA at the national and local level, and take in consideration the questions asked. In some communities it is not easy to discuss sexual behaviour in general and they felt more joint thinking was needed on how to really address this challenge in the right way.

Inadequate resources: It was highlighted as a challenge by all the organisations interviewed. While they are all committed to improve PSEA systems and measures in place, the resources at their disposal are insufficient. Reference was done to lack of financial resources as well as the need to further invest in production of knowledge, development of technical tools and their dissemination. Opportunities for horizontal exchanges of practices, case studies, lessons learnt, guiding tools and manuals of standard operating procedures/minimum standards were highly in demand especially by the national NGOs, which also emphasised on the need to contextualise them.

Concerns were expressed also about some current discussions on PSEA at international level. While all of the organisations were pleased to see the issue high on the international agenda, some of them were expecting the discussion to go more in depth. All NGOs highlighted the importance of investing in ensuring diversity and sustainability of services for victims and expected donors to do more in this regard. Long term investments in strengthening rule of law and challenging harmful cultural norms and practice were considered as crucial game changers, but often absent in current PSEA international discussions.

NGOs interviewed wanted PSEA discussions to cover also private sector, both national companies doing business abroad as well as foreign companies contracted by their governments abroad. As SEA occurs

⁷ Kate Mackintosh and Patrick Duplat, Study of the Impact of Donor Counter-Terrorism Measures on Principled Humanitarian Action (July 2013), available online at: https://docs.unocha.org/sites/dms/documents/ct_study_full_report.pdf

in all settings, few felt that a focus targeting only NGO would send the wrong message to the public and be instrumentalised for political purposes, especially by those who were not keen in humanitarian and development aid investments.

For some of the NGOs it was even unclear if donors were willing to support some of the costs for PSEA institutional capacity building (internally and of partners), as part of the program costs. Another international NGO that had longer experience with donors' engagement in safeguarding, asserted that current practices varied from donor to donor. There was also a concern that the costs were under-estimated. Especially national NGO networks referred to the large and long-term investments needed at the national level to ensure that all organisations, no matter of their size, had a PSEA system in place and functioning.

c) Promising practices

The challenges identified were not stepping back organisations from strengthening PSEA systems and measures. On the contrary, many of them have made use of the increased international attention to PSEA to strengthen internal measures and push for more to be done within their own organisation as well as the entire sector. As already mentioned, many existing promising practices were identified by the ICVA members looking at their internal systems and practices. They vary from refreshment tests on Code of Conducts to helping partners to elaborate their own Code of Conducts and building institutional capacities to implement it, including training and supporting focal points for complaints.

Few of the members referred to the training on specific elements of PSEA and the importance of participating in these training together with other actors at international and national level, so that people can learn from each-others experiences and practices. Training and training tools developed by organisations such as [InterAction](#), [ICVA](#) or the guidance provided by [CHS Alliance](#) and the [IASC Task Force on PSEA](#) are all found useful and need to be updated regularly. One of the members that went through the certification process recently, considered that benchmarking against standards, namely the Core Humanitarian Standards, was helpful internally to strengthen PSEA standards. [Keeping Children Safe](#) was also identified as a very successful initiative, set up by humanitarian and development actors with the commitment to jointly develop, implement and promote institutional child safeguarding standards. The Keeping Children Safe provides also for [a self-auditing tool](#) and a [certification process](#) that can be adjusted more broadly to a PSEA self-auditing tool and easily undertaken by interested organisations.

As most of the challenges identified are at the national level, it is worthy to briefly elaborate on some ongoing work at the country level that was referred to as a promising practice by two of the national NGO networks interviewed. In both cases, reference was done to a [national PSEA network](#). Though the thinking behind and the development of the networks is not the same, they have many interesting features and purposes in common.

Both networks aim largely at strengthening PSEA capacities of all actors working at national level. Their membership includes UN agencies, international, national and local NGOs, with all the members recognising the benefit of learning from each other and joining knowledge and resources to improve PSEA. The engagement is long-term with a specific time-bound action plan, financed by some of the members and with regular follow-up meetings. Instead of coming up with ready made solutions, both networks decided to invest first in mapping what is in place and analysing gaps. In both case, mapping was done by reaching out to all those concerned including also members of the population and authorities. The results of this work will guide further actions by the network. In both cases, the NGOs expected from the network to function as a [PSEA hub](#), from which all actors could benefit regardless of the financial resources available to them. They spoke about a potential role for the hub in ensuring referral of victims for services, identifying/developing friendly complaint mechanisms, sharing experiences and learning, policies, contextualising standardised operation procedures (SOPs), organising training and guiding members further in their PSEA work.

I. CONCLUSIONS AND RECOMMENDATIONS

In the last years, humanitarian and development actors have reached important achievements in enhancing accountability. Commitment and investment in PSEA is one of them, though the issue is also part of a broader agenda, that of fighting inequality and strengthening rule of law. Despite the commendable efforts, the risks remain high and acts of SEA by humanitarian and development staff continue to occur, often remaining hidden, not-reported and/or tolerated. Currently there is an international momentum to move forward the PSEA Agenda. All the actors interviewed very much welcomed this momentum. However, they expressed also some concerns about discussions so far, and shared few recommendations in order to maximise this opportunity. The recommendations can be summarised as per below:

1. **Strengthen engagement in prevention.** Clear code of conducts, checks systems in recruitment, complaint mechanisms and institutional capacities to implement them are all very much needed. However, they do not function in isolation from the local reality. Therefore, PSEA efforts should be better linked with ongoing work on challenging harmful norms and addressing violence, especially against children and women, at local and national level. When conditions allow, capacities of local and national authorities should be build, to uphold justice and address impunity, in respect of international human rights law. Independent national human rights institutions can also play a key role in this regard.
2. **Enhance fight against inequality and promote horizontal relations.** As SEA is substantially about exploitation of vulnerability and abuse of power, it will reduce at a minimum in an environment where all feel safe, equal, able to speak and listen to. These are the core values that must guide PSEA engagement. Few specific examples were given on how it could be reached concretely, varying from the need to engage in an honest discussion about SEA in the sector and its root causes, to promoting healthy working environments, gender equality at work, promotion policies for women and national staff.
3. **Prioritise victim protection and support.** As victims should have nothing to fear by speaking out, more joint reflection and action is needed to address risks of re-victimisation faced at present. Timely access to adequate sustainable services, responding to the multi-dimensional needs of the victims and their families should be guaranteed. This means investments in ensuring specialised services of quality and easily accessible. The elements of gender and age responsiveness are also a must for such services. Compensation is not only a right but for many victims also an important tool to regain control of their lives.
4. **Mitigate negative impact.** It was highlighted that every PSEA related measure should be weighed against potential negative impact on the individual concerned and/or other vulnerable and marginalised population. Impact of PSEA agenda on national and local NGOs should be considered as well. This is not to prevent progress but to make it meaningful, by avoiding too much of top down policy requirements, which risk remaining only on paper. Systems of partnership and organisational culture build on vertical relations are also to be avoided as they kill courage and trust and prevent complaints from being raised.
5. **Enhance focus on national and local level.** The ongoing advocacy and communication efforts at international level should be translated in further steps on the ground. The building of PSEA measures and systems should be done together with national and local actors as well as communities concerned. A lot can be learnt from complaint mechanisms build and adjusted with the communities involved. Moreover, PSEA hubs/networks, bringing together all humanitarian and

development actors working in the country, enables not only capacity building there where the risks are higher but also serves efficiency through joint resource mobilisation and knowledge management.

6. **Ensure long term commitment and investment.** PSEA is not a quick win. Any strategy aiming at progressing the PSEA agenda, should be based on long-term planning and adequate ongoing resources. In line with the above recommendations, a great part of the resources should go where the risks are higher, thus at local and national level. Commitments to do more and better should be accompanied with resources and support. Also, more evidence is needed to guide the work. Few indicators have to be agreed upon to guide measurement of progress and adjustments on short, medium and longer terms.



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