



HARMONISED REPORTING SCHEME ON SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH)

FINDINGS FROM A YEAR OF PILOTING

September 2022-October 2023

November 2023



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BACKGROUND

The absence of a standardised approach to data collection, reporting, and analysis of incidents of sexual exploitation, abuse, and harassment (SEAH) is a widespread issue and major challenge in the aid sector, hampering collective efforts to effectively mitigate SEAH risks, prevent incidents, and improve responsive actions.

Coupled with the limited research into the overall scale of the issue, this lack of standardised approach results in a poor understanding of SEAH prevalence within the aid sector, making it ill-equipped to tackle the issue. This dearth of knowledge extends to critical aspects such as the specific typologies of incidents, most at-risk profiles of victims/survivors and recurrent profiles of alleged perpetrators, environments that foster permissive settings for SEAH, and other underlying risk factors. The true scope and contours of SEAH in the aid sector remain shrouded in uncertainty and the sector only sees the tip of the iceberg.

Despite notable advancements in raising awareness on the issue within the aid community in recent years, addressing the persistent issues of under-reporting, limited transparency, and inconsistency in response remains an area where the aid sector struggles to identify unified and effective solutions and to work in coordination and collaboration to achieve lasting positive change.

Although many organisations now collect and report data on SEAH, it was found in an assessment conducted by the CHS Alliance and the Steering Committee for Humanitarian Response (SCHR) that no common agreement exists on exactly what should be reported in relation to incidents of harm and abuse. As such, the data we have on SEAH is restricted to the organisational level, limiting possibilities of aggregating it for more advanced anonymised analysis. Additionally, some agencies report only on SEA, while others have a wider interpretation of safeguarding, to include harassment and other types of harm. Much of the guidance is fairly general and does not specify exactly what incidents and what detail should be reported.

As a result, many agencies have developed their own interpretation of SEAH reporting requirements and there is currently no consistent approach across the sector. As summarised by an organisation consulted in the initial research conducted to inform the project: "We are not speaking the same language."

Reporting limited to the individual organisational level also poses significant challenges to share trends safely and anonymously, as the more specific the information shared the higher the risk of identification, limiting organisations from sharing detailed trends. Aggregating data with other organisations removes this barrier and allows for the sharing of data and trends safely and anonymously.



ABOUT THE SEAH HARMONISED REPORTING SCHEME

The SEAH harmonised data collection and reporting scheme ("the Scheme") is an initiative led by the [CHS Alliance](#) and the [Steering Committee for Humanitarian Response](#) (SCHR), supported financially by the [Foreign Commonwealth Development Fund](#) (FCDO) which started in 2021.

It aims to increase transparency on SEAH in the aid sector and harmonise SEAH data to support trend analyses and effective learning from aggregated and anonymised data. Members of the Scheme report twice a year on agreed-upon data fields into an online platform, where the data is aggregated and anonymised before being analysed in-depth to identify trends and patterns. The data reported includes no identifiable information, and is aggregated with that of other organisations to ensure all incidents are fully anonymised. This allows for trends to be shared in a safe way with enough detail to inform action.

The trend analyses produced by the Scheme are valuable evidence to inform and improve policies, strategies, and actions for better SEAH risk mitigation, prevention, and response. They also allow for increased transparency, which, combined with better victim/survivor outcomes, are key to tackling under-reporting on SEAH in the aid sector.

PHASE 1: RESEARCH

In 2021, the CHS Alliance conducted a [study](#) on the current situation regarding SEAH data collection in the aid sector, mapping publicly available information and conducting confidential interview with 60 NGOs (international, national, and local), private sector organisations, representatives of foundations, umbrella organisations, and donors.

The study found that many agencies across the humanitarian and development sector are collecting detailed information on SEAH and safeguarding incidents reported to them, to enable proper investigation and case management, as well as appropriate internal and external reporting. There is, however, no consistent approach on the data being collected and how it is being reported. The only existing system of harmonised data collection on SEA is the UN iReport, a publicly available database that only records SEA incidents (excluding harassment). However, the UN iReport is limited to capturing incidents where UN and implementing partner personnel are involved.

Only a small number of INGOs have set up internal online data reporting systems, enabling them to have a clear overview on the number of SEAH incidents across their countries of operation, while most other INGOs and private sector agencies use less automated methods, usually involving an internal database, spreadsheet or filing system. National organisations tend to have resource limitations in relation to using digital methods and less standardised data collection and reporting mechanisms for SEAH. Overall, all organisations were found to collect similar but different data on SEAH using varied systems developed to suit their organisation or context.

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The study nonetheless found that there was general agreement among the participants that a more harmonised approach to reporting on SEAH incidents could bring many advantages, if set up in the right way with clear purposes and scope, together with an inclusive approach. Most agreed that a shared understanding of expectations and parameters for reporting between all key stakeholders operating in the aid sector, together with a mutual accountability approach, would go a long way in helping address SEAH by enabling transparency, building strong response systems, implementing safe programming, and being overall more evidence driven in tackling SEAH.

PHASE 2: PILOT

Following the study and based on the learnings from consultations, the CHS Alliance designed and piloted a data collection tool and reporting platform for SEAH incidents over a year (September 2022 - October 2023) with, at the time, a group of 24 international & national NGOs and private sector organisations, under the overall guidance of a Steering Committee composed of key figures in the safeguarding realm.

Throughout the pilot, the reporting tool and platform underwent quarterly testing and received extensive feedback from users. This allowed for data fields and parameters to be updated and reviewed, to better reflect realities from different types of organisations and from the field. The platform also underwent significant changes to be more user-friendly, accessible, and ensure the best level of data protection.

During the pilot, the CHS Alliance also conducted extensive outreach to organisations across the aid sector, donors, and safeguarding networks to further discuss the tools and collect feedback, evaluate possibilities for alignment, and increase membership.

In October 2023, the Scheme's Steering Committee validated a final framework for harmonised SEAH reporting, to be scaled up across the aid sector ([annex 1](#)).

PHASE 3: SCALE UP

The third phase of the project will build on the learning and experience from the first two phases and proposes the scale up of a common data collection and reporting system with robust trends analysis available to aid actors to improve PSEAH risk mitigation, prevention and response. This public sharing of trends will also allow the sector to be more transparent on SEAH and safely share greater information on how incidents are handled with the communities it serves, furthering trust and in turn, reducing under-reporting.

Aid actors will report bi-annually on a set of non-identifiable and comparable data fields on SEAH, using a secure information management system accessible to all types of organisations operating in the aid sector. On the platform, they will have access to dashboards allowing them to filter aggregated data to tailor it to their contexts or to a specific parameter they wish to review. Additionally, publicly available advanced analysis will be produced bi-annually to inform evidence-based SEAH risk mitigation, prevention and response in the aid sector.

KEY FINDINGS FROM A YEAR OF DATA

This report presents the main findings from the data on SEAH incidents reported during the pilot - from October 1st 2022 to September 30th 2023 - by [24 organisations](#) (11 international NGOs, 9 local NGOs, 1 Red Cross Red Crescent organisation, and 4 private sector organisations)

A total of 133 incidents of sexual exploitation, abuse and harassment (SEAH) were reported through the Scheme during this period. It is worth noting that the scope and definition of SEAH varies from one organisation to another - and as such some organisation have reported incidents of SEAH against both staff and communities.

The data shared is only from reported incidents by members of the SEAH harmonised reporting Scheme.

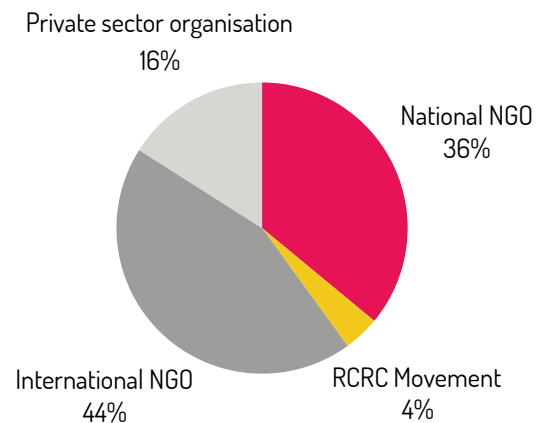
With persistent under-reporting of SEAH across the sector and the members of the Scheme representing only a small fraction of organisations operating in the sector, this report neither aims to be considered representative of sector-wide SEAH trends, or of the total incidence or prevalence of SEAH.

Nonetheless, it is likely the existence of the Scheme and its expansion will end up capturing hundreds of incidents and progressively help us grasp the sheer scale of SEAH in the sector. This would be a positive outcome as strong reporting should be considered a good sign with heightened numbers indicating greater trust in sector's reporting systems.

Additionally, when compared with key trends or findings from other reporting systems, we can identify similar patterns, also confirmed by SEAH practitioners as conforming to what they see in the field. As such, some evidence and learning can be taken from this report - particularly but not only for members of the Scheme.

This report gives us a glimpse of what trend analysis could look like if we harmonise the way we collect and report SEAH data, and the learnings that could be achieved with a more representative sample size. The more organisations that join the Scheme by reporting non-identifiable non-personal data on a bi-annual basis, the stronger the quality of the data analysis and the more representative the trends. Inputting their data into the platform would require minimum effort by organisations, and with no personal data collected and the aggregated format for analysis, it would not present any safety risk for victims/survivors, alleged perpetrators, or organisations.

Types of organisations part of the Scheme



GEOGRAPHY OF INCIDENTS

The majority of the reported incidents took place in the **Middle East (22%)**, followed by **Eastern Africa (15%)** and **Central Africa (13%)**. This is aligned with the operational areas of the Scheme members who provided case data, but some specific findings can nonetheless be identified from this information.

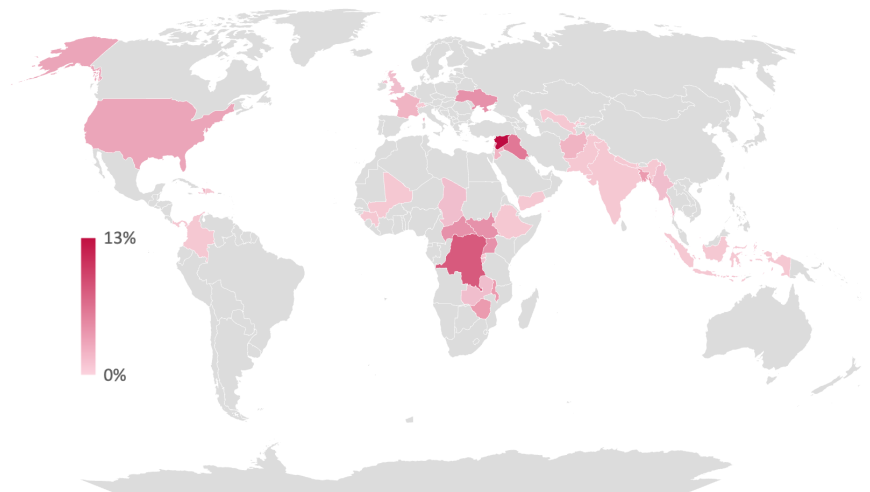
The three countries where most incidents were reported are **Syria** - 13% of incidents, the **Democratic Republic of Congo (DRC)** - 8%, and **Iraq** - 6%. Other countries with a higher number of incidents include Bangladesh, Central African Republic, South Sudan, Ukraine, Occupied Palestinian Territories, Malawi, Zimbabwe and Uganda (4% respectively).

Although the Scheme and the Inter-Agency Standing Committee (IASC) SEA Risk Overview (SEA RO) are not statistically linked (considering the reported incidents of the Scheme depend on the number of participating NGOs and the likelihood of reporting, not the actual incident prevalence), we can still see some similarities in high risk countries, with several countries being on top of the list in both the Scheme and the SEA RO (e.g. Syria, DRC, South Sudan, among others). Nonetheless, it is interesting to note that the two countries with a highest risk level in the SEA RO - Yemen and Afghanistan - have a lower number of reported incidents in the Scheme, despite several Scheme members being active in those countries.

On the other hand, **Iraq is low on the SEARO, but has a higher level of reporting in the Scheme**. Countries like Malawi, Bangladesh, Uganda, or Zimbabwe - either low or not featured on the SEA RO - also have higher reporting rates in the Scheme.

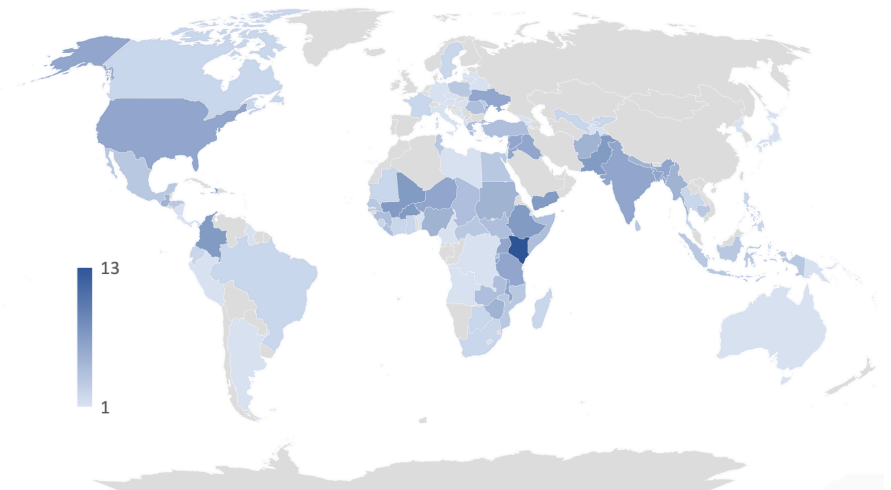
As such, Scheme members and PSEA Networks in these countries are particularly encouraged to review the trends in this report and, when relevant, take action.

Countries of reported incidents



The darker the colour shade, the highest the number of incidents reported

Countries of operation of Scheme Members



The darker the colour shade, the largest the presence of Scheme Members

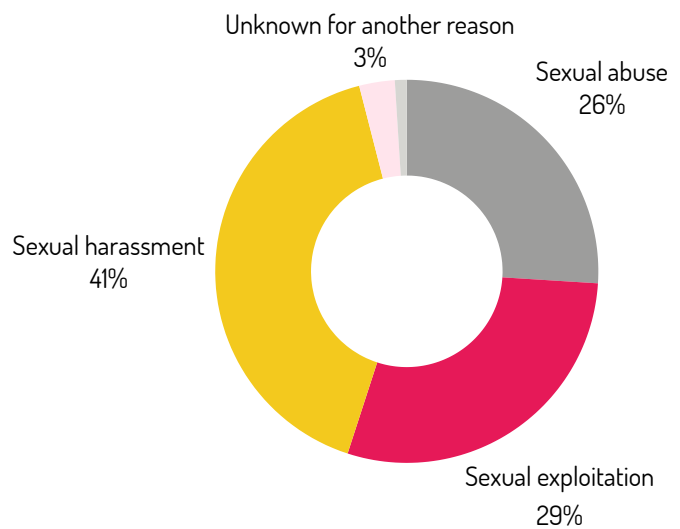
TYOLOGY OF INCIDENTS

The majority of the reported incidents are sexual harassment (41%), followed by sexual exploitation (29%) and sexual abuse (26%). The typology was unknown in 3% of cases, or not disclosed due to a risk of identification in 1% of cases.

It is important to note that this data includes incidents occurring in the workplace, as some Member organisations include this in their definition of SEAH.

To be able to have more clarity on the typology of incidents, a new data field will be added from October 2023, to distinguish incidents and victims/survivors in the workplace (e.g. against the staff member or affiliated personnel of an organisation) vs incidents and victims/ survivors from the community.

Type of incident reported



PROFILE OF THE VICTIM/SURVIVOR

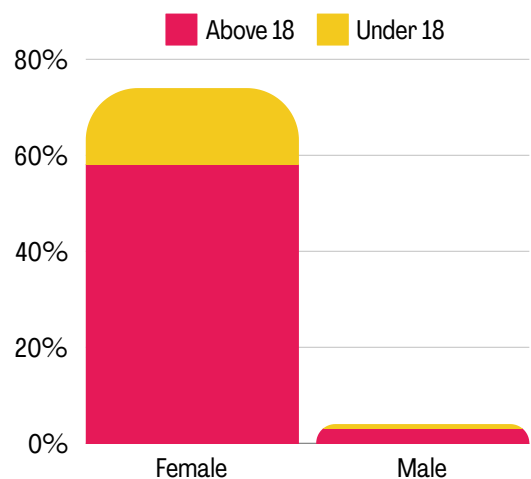
The majority of victim/survivors are female (84%) whereas males account for 4% of incidents. The sex was unknown in 11% of incidents, or not reported due to a risk of identification in 1% of incidents.

The majority of victims/survivors are 18 or above (in 64% of incidents), whereas victims/survivors were under 18 in 19% of incidents. The age group was unknown in 11% of incidents, not disclosed in 1% of incidents, or not collected in 1% of incidents.



One victim/survivor out of five is a girl under 18

Sex and age groups of victims/survivors

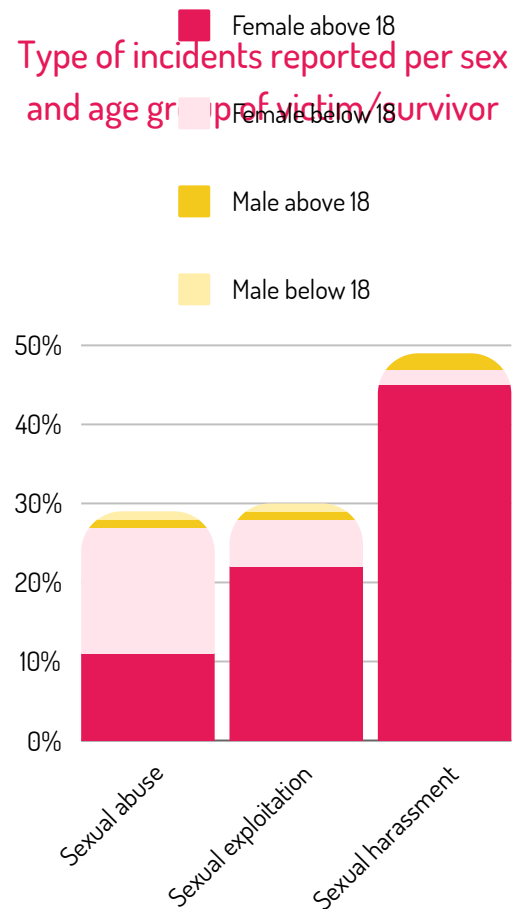


When looking specifically at the profile of the victim/survivor per type of incident we can identify the following trends:

- **Women are most at risk of sexual harassment** and, to a lower extent exploitation, whereas **girls are most at risk of sexual abuse** and, to a lower extent, exploitation
- **Men are most at risk of sexual harassment** whereas **boys are most at risk of exploitation and abuse.**

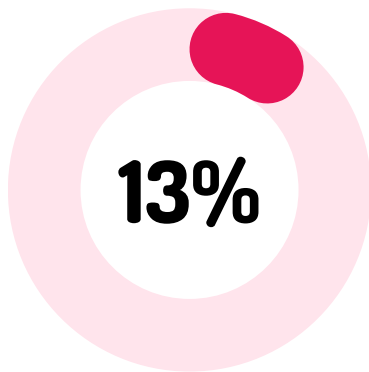
The higher number of abuse incidents against minors can be partly attributed to the fact that many organisations classify SEAH incidents as sexual abuse when the victim/survivor is under 18. Nonetheless, the number of victim/survivors under 18 highlights the **importance of strengthening child safeguarding policies** and ensure risk mitigation, prevention and response measures specific to the needs of children are taken.

Additionally, **attention needs to be given to the number of males victims/survivors as services and support are often unavailable to them.**



ALLEGED PERPETRATOR PROFILE

The majority of alleged perpetrators are males (in 68% of incidents), while females account for 7%. In 25% of incidents, this information was not available because the data field on the sex of the perpetrator was added from the second quarter of the pilot. As such, we can say that when the information was collected, **males accounted for 91% of alleged perpetrators** and females for 9%.



13% of alleged perpetrators are international staff

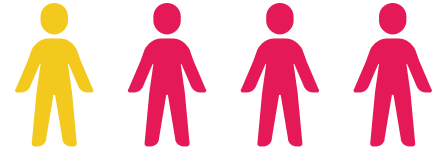
The majority of incidents were allegedly perpetrated by national staff (75%). In 12% of incidents, the status of the perpetrator was unknown. **International staff accounts for 13% of alleged perpetrators.** Considering the ratios between national staff and international staff in most organisations (i.e. international staff rarely represents more than 10% of the personnel) **the percentage of incidents perpetrated by international staff is alarmingly high.**

Senior managers account for 10% of alleged perpetrators, whereas middle managers account for 14% and field staff for 27%.

In 9 % of incidents, the level of the staff member was not disclosed. Again, when keeping in mind the small ratio that managers represent amongst the workforce, **the percentages of alleged perpetrators in management positions - in particular senior management - is alarmingly high.**

Field staff also account for one fourth of alleged perpetrators, emphasising again the importance of training the teams who are in contact with communities on safeguarding. Trainings must be tailored to the context to ensure they are fully understood by staff, using for instance fictional scenarios to ensure practical learning as opposed to theoretical.

1 alleged perpetrator every 4 is in a managerial position



When looking at the typology of incident per status and profile of the alleged perpetrator, we can see that **senior managers are most represented in incidents of sexual harassment and sexual exploitation**, middle managers are most represented in incidents of sexual harassment, and field staff are represented in all three typologies of incidents (exploitation, abuse and harassment).

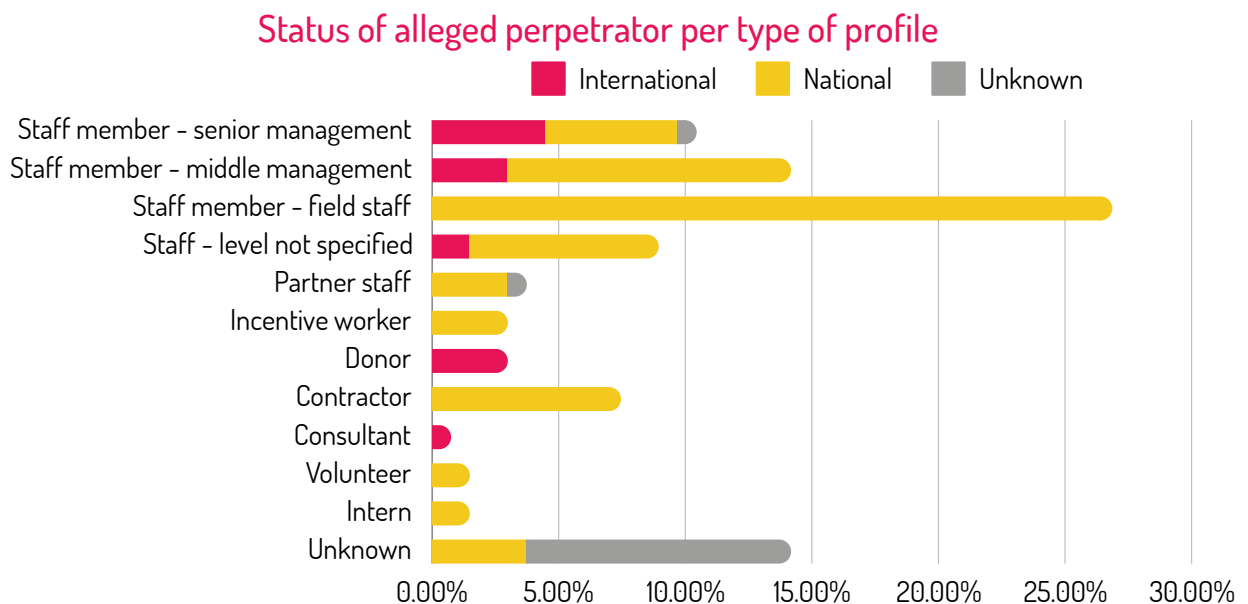
Numbers for other profiles of alleged perpetrators like contractors, consultants, or volunteers also remind us it is imperative that any personnel affiliated with an organisation imperatively sign a code of conduct and be aware of all safeguarding policies, even if they only work one hour for the organisation. It is concerning to see that incidents involving consultants and volunteers were all incidents of sexual abuse, highlighting how much risk is associated with these profiles who are only partly linked to an organisation. Similarly, contractors have been associated with incidents of sexual exploitation and sexual abuse, also highlighting an important risk to consider.

It is absolutely crucial that organisations reflect on how to best ensure that safeguarding standards are upheld by individuals with short-term engagement or contracts - like contractors, volunteers, or consultants. These individuals are put in extreme positions of power within communities - particularly when they take part in aid delivery - and their short-term engagement can sometimes result in them not signing codes of conducts or not being briefed on safeguarding policies, as well as them feeling like they can abuse of community members in impunity as they will have moved to another contract once and if the incident is reported.

Preventing staff members and affiliated personnel from abusing, exploiting or harassing those who they serve is a critical ethical and operational concern for aid organisations. Some critical steps are recommended below to address and mitigate this risk:

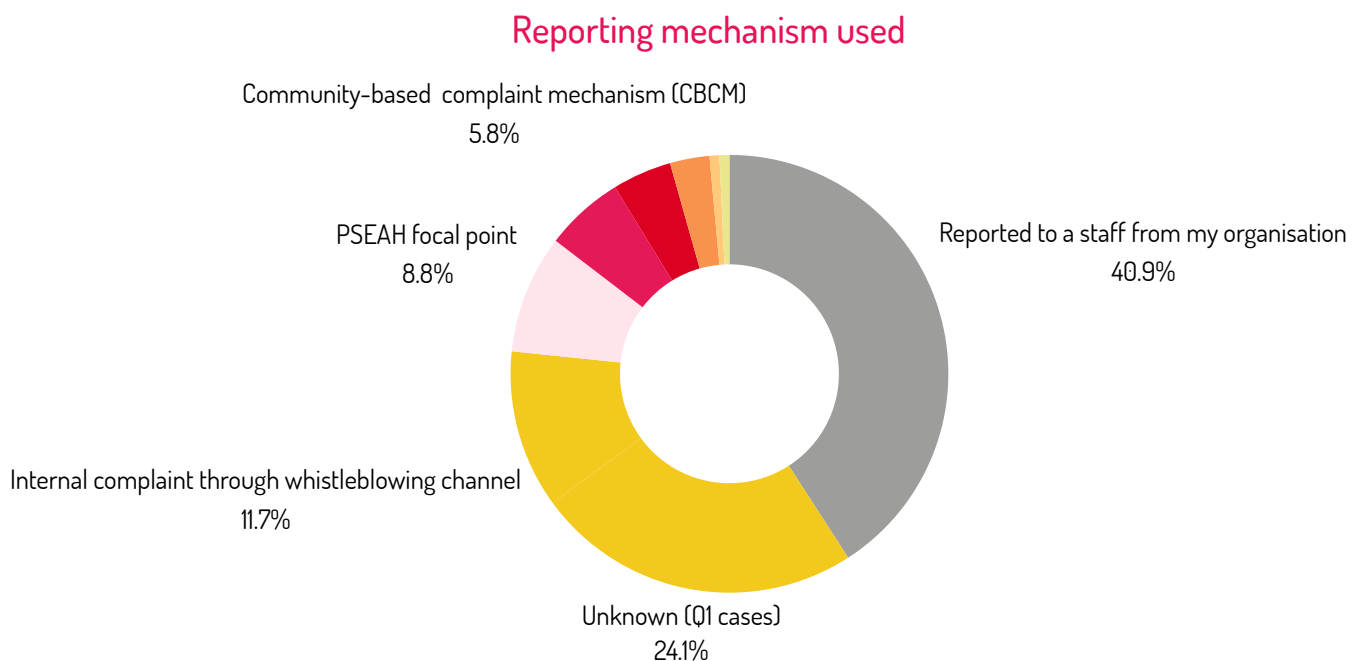
- **Strong codes of conduct:**
 - Develop and enforce a comprehensive code of conduct that clearly outlines expected behaviour and ethical standards for all staff, regardless of their nationality. This code should explicitly define and prohibit SEAH.
- **Training and awareness:**
 - Provide mandatory training to all staff - all affiliated personnel (national and international) and any short-term engagements like contractors or consultants - on the code of conduct, PSEAH, ethical behaviour and cultural sensitivity. Make trainings scenario-based, to ensure training is concrete and accessible.

- Include modules on local customs, norms, and cultural sensitivity to help staff understand and respect the communities they work with.
- **Clear reporting mechanisms:**
 - Establish clear and confidential reporting mechanisms for staff members and community members to report any misconduct or abuse. Ensure that these mechanisms are easily accessible and widely communicated.
 - Protect whistleblowers from retaliation and ensure that reports are promptly and thoroughly investigated.
- **Background and reference checks:**
 - Conduct thorough checks on all staff members and affiliated personnel before hiring to identify any previous history of misconduct or abuse.
 - The [Misconduct Disclosure Scheme](#) is instrumental in ensuring offenders cannot move from one organisation to another.
- **Regular monitoring and evaluation and strong community engagement:**
 - Implement robust monitoring and evaluation systems to assess the impact of projects and identify any potential issues or risks related to staff behaviour, and conduct regular audits/evaluations to ensure compliance with ethical standards.
 - Involve local communities in the planning, implementation, and evaluation of development projects to ensure their active participation and ownership.
 - Establish community feedback mechanisms to regularly collect input and concerns from community members.
- **Strong leadership and accountability as central to the organisational culture:**
 - Promote a culture of ethical behavior and accountability starting from the top leadership of the organization.
 - Hold staff members accountable for their actions and impose appropriate sanctions for misconduct.
 - Zero tolerance for SEAH, should be a clear message for all staff members, regardless of their status or their profile, and must be central to the organisational culture.



CHANNELS OF REPORTING

The majority of incidents were reported directly to the staff of the organisation (40.9%). Other incidents were reported through internal whistleblowing channels (11.7%), PSEAH focal points (8.8%), community-based complaint mechanisms (5.8%), or a staff member from another organisation (4.4%). A minor number of incidents were reported through a referral from a public service, by community leaders, or through an anonymous letter. The data is unknown for a fourth of cases, because this data field was added in the second quarter of the pilot.



The profile of the person reporting the incident corroborates the above: a majority of incidents are reported by the staff members of the organisation (36%). A large part of the incidents were also reported by the community, which is very positive - with 26% of incidents reported by the victim/survivor, 4% by their family, and 13% by another member of the community.

Putting together the information on the entry point and person reporting, we can deduce that the majority of cases are reported either reported directly by staff who may have experienced, witnessed or heard about incidents, or by victim/survivors and their community to staff members. This emphasises the importance of ensuring staff is well trained to receive disclosure to ensure they know how to safely handle the disclosure, as well as respect victim/survivor-centred response approaches.

Finally, the almost null use of community-based reporting mechanisms (CBCM) reinforces the importance of consulting communities to better understand how reporting mechanisms can be more accessible and trustworthy as many victims/survivors may not feel comfortable reporting to a staff member of the organisation, especially if the alleged perpetrator works with that organisation or if they depend on assistance from that organisation, which may deter them from reporting.

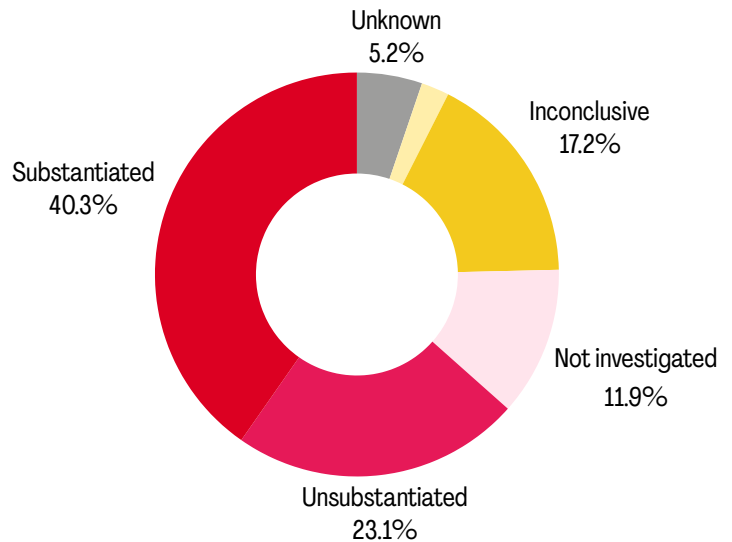
ACTIONS TAKEN: RESPONSE

Two incidents in five were substantiated (40%). Those that were unsubstantiated represent 23%, and those determined to be inconclusive represent 17%.

Numbers on substantiated, unsubstantiated and inconclusive cases are positive, as we can theoretically deduce that 80% of incidents were investigated - although the current data fields don't allow us to confirm this.

However, members reported that no investigation was conducted in 12% of incidents. Incidents were reported to local authorities in only 2.2% of incidents because they were criminal.

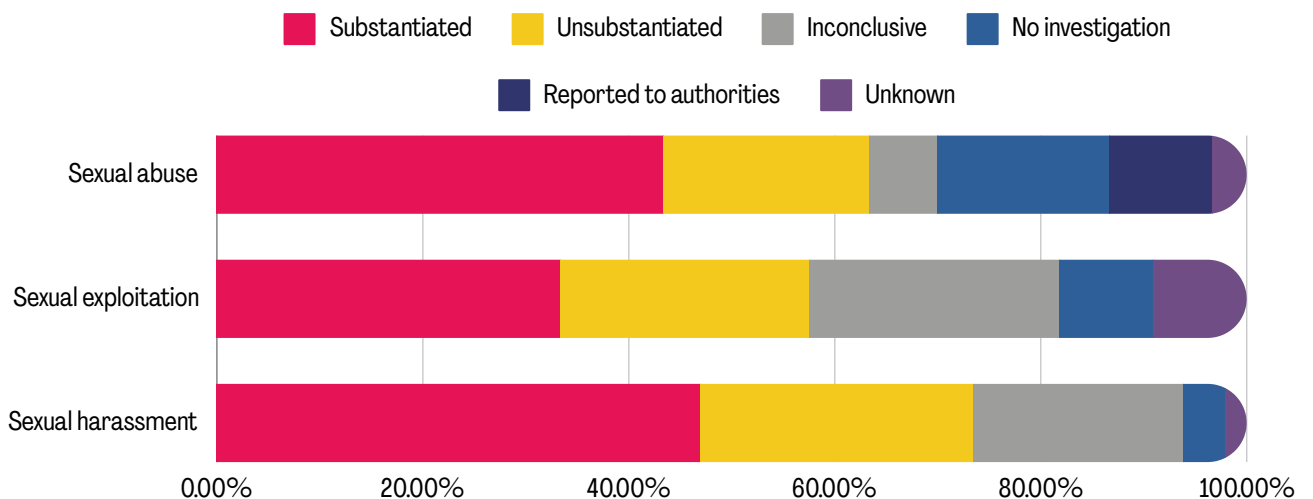
Status of the incident



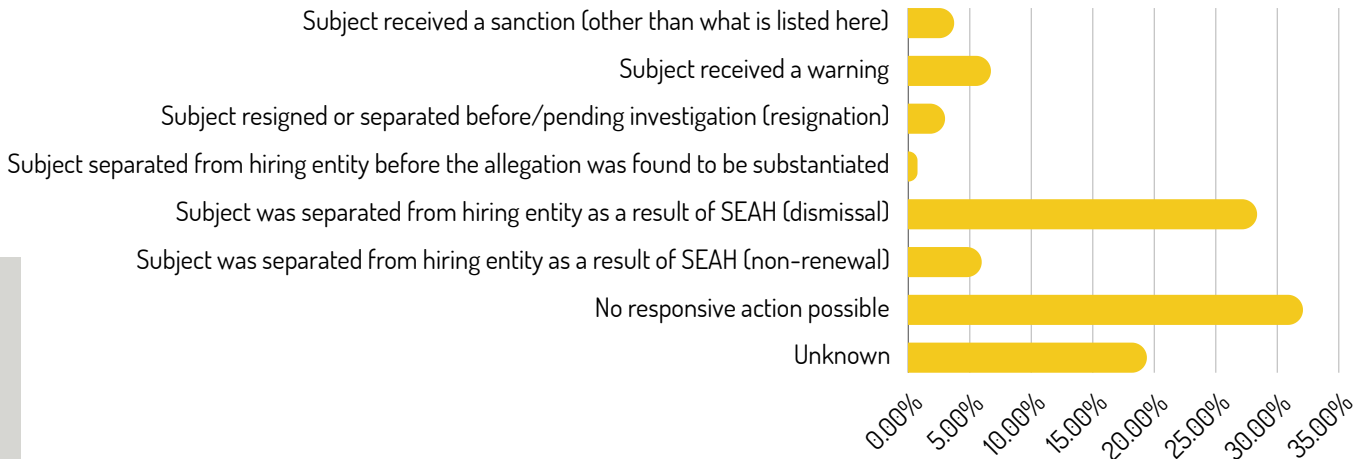
When looking at the status of the incident per type of incidents, we find that:

- **Sexual exploitation was the type of incident less frequently substantiated and most frequently inconclusive.** The high rate of inconclusive investigations for sexual exploitation (24%) could indicate a need for more training for staff receiving the allegation and conducting the investigation.
- **Sexual abuse was substantiated in a majority of cases,** nonetheless there is an alarming percentage of incidents where no investigation took place (17%).
- **Sexual harassment was the type of incident most frequently unsubstantiated,** which could reflect and corroborate a culture of silence around harassment in the aid sector, thereby highlighting the importance of changing organisational culture and policies to also include a zero tolerance to harassment.

Status of the incident per type of incident



Action taken in response to the incident



The responsive actions taken following investigations show some positive outcomes in terms of terminations of contracts for offenders, but also put to light the difficulties organisations face to take actions following SEAH:

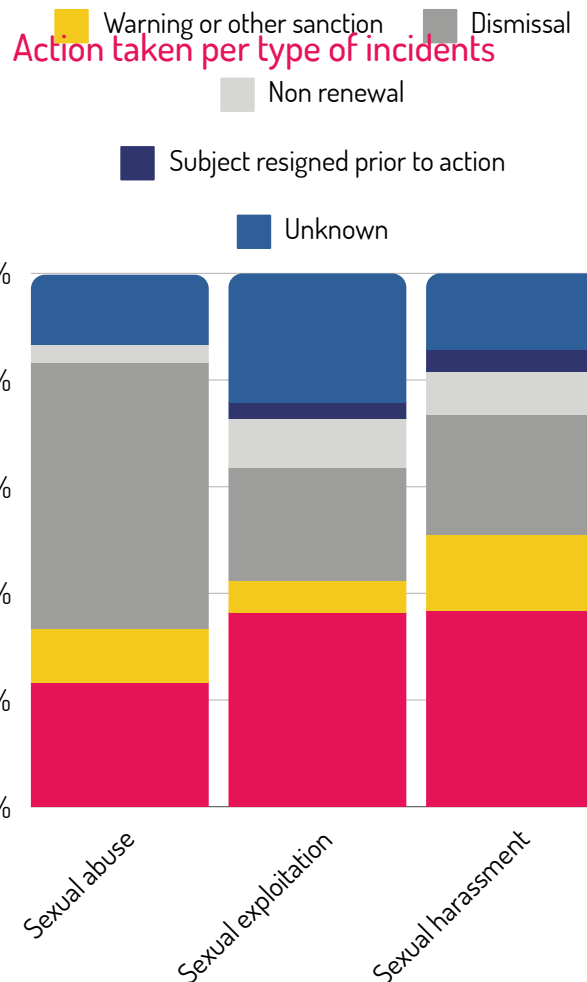
- In the majority of incident (32% - almost 1 in 3 incidents), it was reported that no responsive action was possible.
- In 34% of incidents, the subject was separated as a result of substantiated findings of SEAH (dismissal: 28%; non-renewal: 6%).
- In 10% of incidents, the subject received a sanction (a warning or other).
- In 4% of incidents, the subject either resigned or was separated before the investigation.
- In one incident in five, the action taken was not reported.

Sexual harassment and sexual exploitation are the type of incidents where no action was taken in most cases, which can be explained by the fact that they are also those most frequently unsubstantiated or inconclusive.

They are also those where alleged perpetrators most often resign prior to action, which could indicate a trend of offenders not being sanctioned and moving to other organisations to keep their record clean.

Members also reported these incidents as the most complex to handle due to terminations resulting in heavy legal repercussions and risks in certain context and legal environments.

Sexual abuse is the type of incident where the alleged perpetrator was most frequently terminated: half of the subjects of complaints were dismissed.



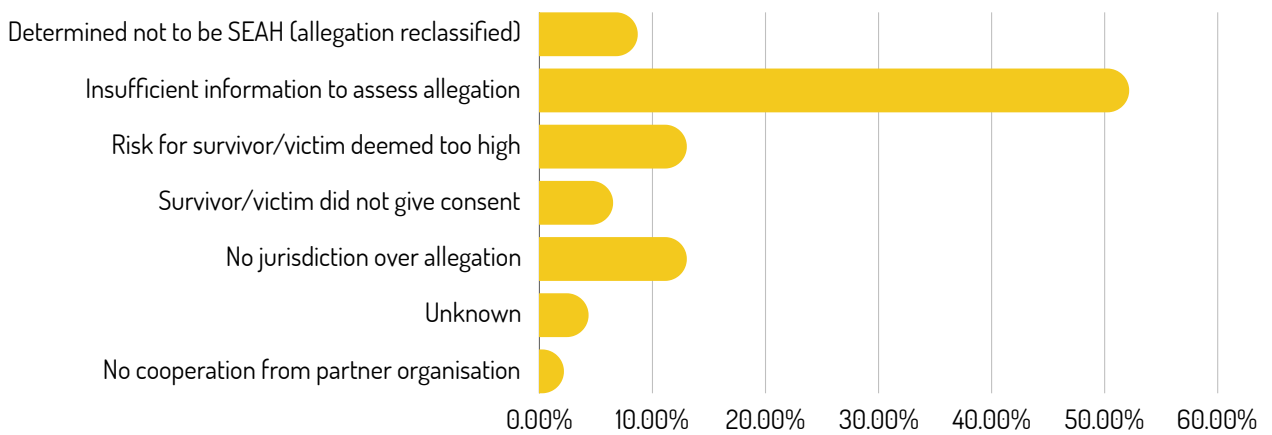
Finally, in half the incidents where no action was taken, it was due to insufficient information to assess the allegation, re-iterating the recommendation made above of training all staff to know how to react to SEAH disclosures, to ensure first and foremost that they adopt a victim/survivor centred approach, but also ensuring that they collect the right information in a safe way to allow for investigations to take place.

In 50% of incidents where no action was taken, the reason was insufficient information



Situations where the risk for the victim/survivor/ was deemed too high (13%) or the victim/survivor did not consent for an investigation to take place (7%) were also reported, emphasizing the need to make resources available for investigators in such a situation as these issues shouldn't prevent other actions from being taken. If we do not investigate when we deem the risk for victim/survivor as too high or when they do not consent to take part in the investigation, we risk encouraging alleged perpetrators to threaten victims/survivors and create a culture of impunity.

Reason why no action was taken



ASSISTANCE RENDERED

Assistance to the victim/survivor was rendered in half of the incidents, with mental health and psychosocial support (MHPSS) accounting for the vast majority of assistance provided (27%), followed by medical assistance (8%), legal assistance (5%), economic assistance (4%), physical protection (4%) and other (3%).

For half of the incidents where no assistance was rendered, no reason was specified in 27% of incidents, whereas in 7% no victim/survivor was identified, in 6% the victim/survivor did not seek assistance, and in 1% no assistance was available. The fact that half of the victims/survivors did not have access to assistance emphasises the importance of improving outcomes for victims/survivors, as this is a key step to encourage reporting.

If victims/survivors do not have access to support and do not see outcomes when they report, under-reporting will continue to stay high as reporting will be seen as a burden or risk, as opposed to a way to access justice and support.

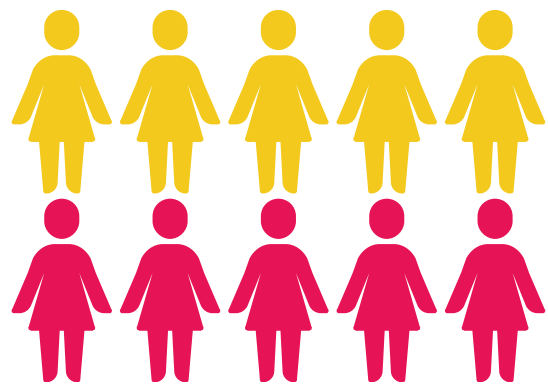


Finally, legal assistance remains low (5%), which is concerning considering some of the trends (e.g. 13% of incidents are sexual abuse against children which are criminal cases). Victims/survivor should have access to legal support should they wish to pursue legal action against the perpetrator. Regardless of whether the victim/survivor wants to take part in legal proceedings, those must be initiated by organisations when appropriate to hold alleged perpetrator accountable.

Assistance for victims/survivors of SEAH thus still requires attention by the aid sector. PSEA networks in collaboration with GBV Areas of Responsibility must map services available for victims/ survivors and make clear and up-to-date referral pathways available so they can be used in a timely manner in case of disclosure.

Ensuring better outcomes for victims/survivors is key to reduce under-reporting of SEAH. Staff who manage incidents of SEAH should be informed of referral pathways and services available, and organisations have the responsibility to bear the costs if any.

At least one form of assistance was rendered to the victim/survivor in half of the incidents



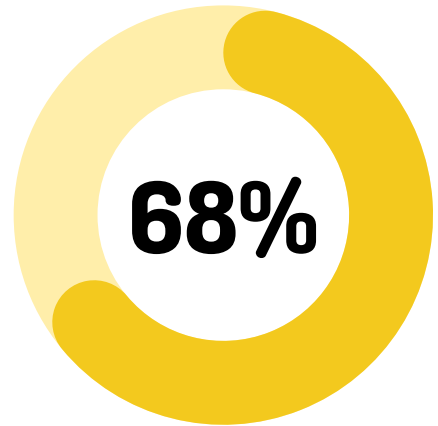
Finally, all staff members - in particular those most likely to be in touch with victims/survivors (investigators, PSEAH focal points, etc) - as well as services providers should be trained on victim/survivor-centred approaches to ensure the safety and dignity of victims/survivors in case of disclosure.

REMEDIAL ACTIONS

Remedial actions - actions for longer-term organisational changes to reduce risks or prevent SEAH - **were taken in 68% of incidents.** Those were in the vast majority of cases training of staff or affiliated personnel (25%), followed by the assessment and/or implementation of human resource risk mitigation measures (15%) and programmatic risk mitigation measures (11%), community awareness raising (13%), the design of a PSEAH action plan (4%), or other remedial measures (1%).

No remedial measures were taken in 24% of incidents or were unknown by the person reporting the incidents into the Scheme in 8% of incidents (which doesn't mean they weren't taken).

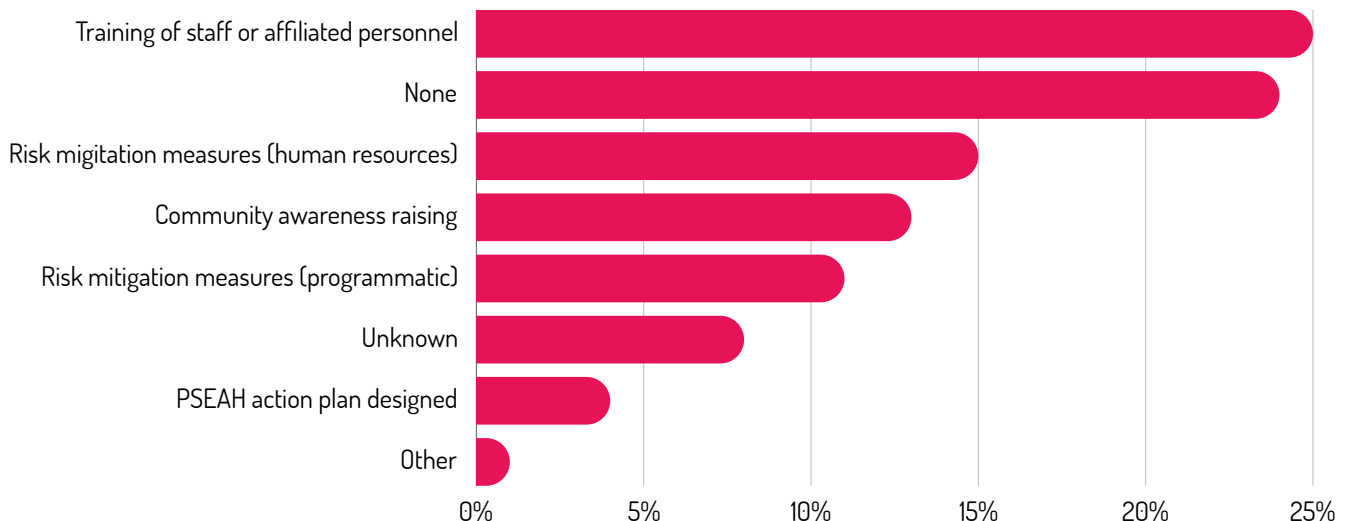
Remedial actions were taken in more than two thirds of incidents



Remedial actions - as those listed in the section above - **are instrumental in building a safer environment for humanitarian assistance.** They should be systematic: **all organisations should conclude their incident handling process with a learning phase** where key actions are decided to prevent such types of incidents from occurring again.

Precisely for this matter, having evidence to inform remedial actions like the ones contained in this report is key. For instance, understanding the profile of the alleged perpetrator can allow us to tailor trainings. Understanding what types of reporting mechanisms are being used and by whom can also allow us to improve them. Understanding the profile of victim/survivor according to the type of incident can help us tailor awareness raising in communities. These actions can be taken to prevent SEAH before incidents happen.

Remedial actions taken



CHALLENGES & LESSONS LEARNED BY MEMBERS HANDLING INCIDENTS

As part of reporting, Scheme members have the ability to report any challenges they have faced or any lessons they have learned, in order for the information to be used to inform capacity building or to be shared with peers. Some recommendations, formulated by members and by the Scheme team, are shared below:

Complexity of investigations when there are high risks to the victim/survivor or when the victim/survivor does not wish to cooperate.

The [CHSA SEAH Investigation Guide](#) provides guidance on safe ways to conduct investigations when witnesses/victims/survivors do not consent to be part of the investigation due to fear or mistrust. Further guidance on managing high risks for victims/ survivors would be useful to develop.

Staff turnover in the sector making investigation difficult or disciplinary measures impossible when witnesses or alleged perpetrators have moved on to another organisation.

The [Misconduct Disclosure Scheme](#) is essential in ensuring offenders cannot move from one organisations to another.

General lack of resources to recruit investigators who are often over-stretched, and lack of qualified investigators in some regions.

Organisations should look into the [CHSA Investigation Qualification Training Scheme](#). Further resources should also be allocated to ensure access to internal investigators who are able to travel, or to external investigators from regional pools.

Complexity of handling incidents in cases of dual jurisdiction (law within country of incident vs law of the perpetrator's contract)

Importance of having internal or external legal services with an understanding of the aid sector and its complexity in terms of labor law, and an understanding of SEAH

Absence of quality community based complaints mechanisms and lack of trust of victim/survivors and their families in these mechanisms.

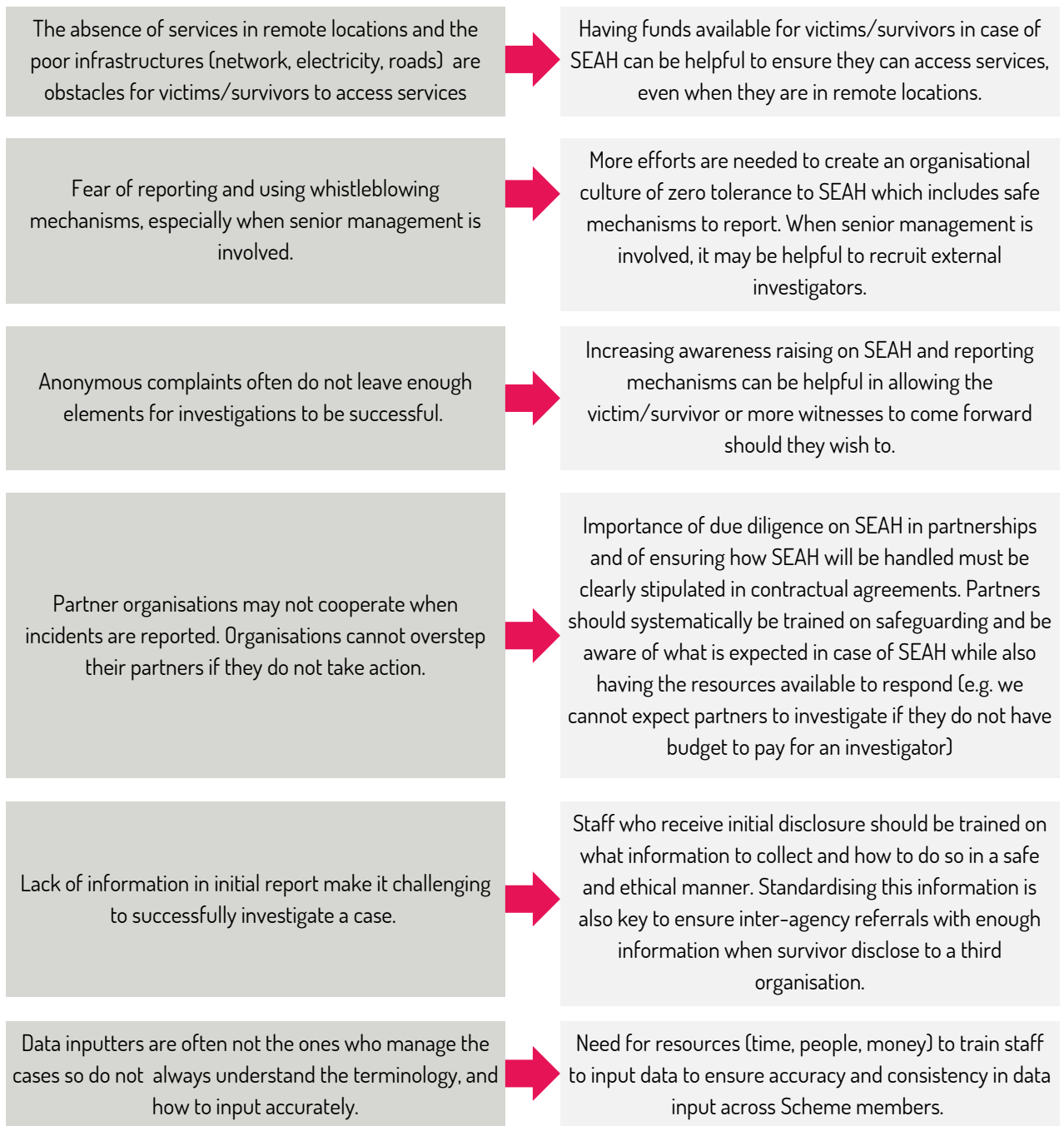
Always consult communities when setting up complaints mechanisms to ensure they are safe and accessible (see [CHS commitment #5](#)). They should be regularly be explained to communities as no one will report into a system when they do not understand the process.

Limited understanding of SEAH from communities, resulting in victims/survivors or their family not seeing the abuse of power and therefore refusing to report or take part in the investigation

Conduct regular awareness raising session where SEAH is explained by discussing root causes linked to abuse of power. Participatory exercises like scenarios can be helpful and concrete.

Contractors are poorly informed of safeguarding policies resulting in incidents and difficulty to taking action in case of incidents.

All affiliated personnel - including contractors - must sign a code of conduct and be trained on the safeguarding policies of the organisation



The challenges and lessons learned highlighted above provide some important evidence for organisations and donors on elements to prioritise when operationalising safeguarding.

Together with the data from the report, they provide valuable information to help donors identify where safeguarding resources should be allocated, guide organisations in identifying what key actions should be included in their safeguarding priorities and strategies, and for technical groups like IASC PSEA Networks or other Safeguarding networks provide awareness of what further capacity building is required or what guidance should be developed.

In parallel, peer-to-peer exchange sessions will continue to be organised with Scheme members to create a space to share and learn from challenges and lessons learned in different contexts.

LESSONS LEARNED FROM A YEAR OF PILOTING

Over a year of piloting, challenges have been identified when promoting the SEAH Harmonised Reporting Scheme in many foras and with many organisations. They are shared below to take into consideration to ensure a successful scale up.

THE ROLE OF LEADERS

After a year of piloting and dozens of presentation on the Scheme with different organisations and in different foras, it has become clear that those who remain to be persuaded are leaders. Generally, the Scheme has been welcomed and received positive feedback from safeguarding leads or focal points, but there remains a clear need for leaders to take ownership of this initiative for each organisation to join. **As the project scales up, more work needs to be done to convince leaders to sign up their organisations to strengthen their accountability and transparency standard, improve organisational strategies, and strategically allocate safeguarding resources.**

HIGH EXPECTATIONS FOR DONOR ALIGNMENT

The main obstacle to joining reported by non-members who took part in a survey was the perception of the Scheme as an additional reporting burden, which they did not have the internal capacity to take on. Similarly, in phase 1 consultations, the main challenge to harmonisation shared was the high reporting burden for SEAH cases, due to different donors having different requirements. As such, before joining, many organisations are waiting to see whether the Scheme would indeed allow to mainstream SEAH reporting, or would only create another reporting burden. **Donors play a key role here as the majority of external reporting is provided to them based on their individual requirements. Their endorsement will also encourage their grantees to join and will be instrumental in making the Scheme become a marker of accountability & transparency.**

A UNIQUE OPPORTUNITY FOR KNOWLEDGE EXCHANGE

The SEAH harmonised reporting scheme offers a unique opportunity for its Members to collaborate and learn from organisations of varying sizes and capacities. This collaborative approach fosters a dynamic exchange of knowledge, experiences, and best practices, enabling

organisations to it from the diverse perspectives and strategies employed by their peers, whilst driving innovation and positive change, as diverse organisations come together and brainstorm ways to overcome challenges they face in operationalising safeguarding and PSEAH.

By engaging in this cross-organisational dialogue, members can collectively develop more effective prevention measures, refine reporting mechanisms, and enhance their overall SEAH response. This collaborative learning not only strengthens individual organisations' abilities to prevent SEAH, but also contributes to the sector's collective effort to create a safer and more accountable environment for both aid workers and the communities they serve. This knowledge exchange needs to be further strengthened at scale up, with more opportunities for peer-to-peer exchange and facilitated dialogues between members. More advanced and more user-friendly options relying on the newly available platform with more technological options should also be assessed.

THE NEED FOR DATA PROTECTION GUARANTEES

Organisations who have not yet joined the Scheme also reported concerns on data protection, confidentiality, and legal implications, showing that the type of data collected by the Scheme remains misunderstood. **No personal data is collected in the Scheme** and the Scheme platform has strong data protection safeguards in place, as explained in the Scheme's data protection protocol (available upon request). Indeed, 100% of Scheme members confirmed they were comfortable with the data protection and felt like the analysis produced with aggregated data allowed to maintain confidentiality and anonymity for their organisation, the victim/survivor, and the alleged perpetrator.

THE NEED FOR MORE USER-FRIENDLY PLATFORM

Due to budget constraints during the pilot and the need to be able to constantly review and adapt the platform to feedback, it was decided to stick with a simple reporting platform on Sharepoint, which did result in some technical challenges and proved to be a deterrent in joining for some organisations. **As the Scheme scales up, and budget permitting, a more professional user-friendly platform will be developed** relying on more advanced technology which will allow for members to sign in with their professional addresses, allow them to log incidents in no more than a few minutes, and most importantly give them access to dashboards allowing them to adapt the aggregated trends to the evidence they are looking for (e.g. by country).

LANGUAGE AS KEY TO ACCESSIBILITY

The absence of other options than English for reporting during the pilot proved to be an important obstacle to joining or reporting - particularly for local organisations. **As such, to make the Scheme accessible to organisations globally, the reporting platform and tools will be available in multiple languages, as well as the analytical reports published.** Indeed, the Scheme truly aims to be accessible not only to large INGOs but also to local organisations, as they are in constant contact with local communities, making them key actors in safeguarding.

MAKING REMEDIAL ACTIONS A PRIORITY

Many organisations who were asked about key reasons why they had not yet joined the Scheme disclosed they still do not see the added value of the Scheme, or said that joining the Scheme not considered a priority. Today, **PSEAH still remains fundamentally focused on response, when we know much can be done to prevent incidents from happening and to mitigate risks.** But with no data to inform these actions, many organisations use a one-size fits all approach, like doing blanket identical trainings across their operations. These top-down actions are of course useful, but their effectiveness would be largely increased if they were targeted using evidence. Similarly, many organisations have PSEAH action plans which are based on general knowledge of risks of SEAH - these action plans could gain in efficiency and impact if they were grounded in evidence.

The risks outlined in the report will allow members to take actions for safer recruitment, safer programming, tailored awareness raising and training, and many others.

Reports from the SEAH harmonised reporting scheme should be a useful read not only for safeguarding leads but also for individuals like CEOs, head of programs or operations, program managers, human resource managers, distribution supervisors, and any other type of staff or affiliated personnel as PSEAH and the mitigation of risks of SEAH is the responsibility of all staff members.

Donors and safeguarding networks play a key role in creating a shift in policy dialogue to ensuring PSEAH isn't confined to response and more work is done on remedial actions and preventive measures.

SCALING UP THE SCHEME

A CALL TO ACTION

DONORS MUST PLAY AN ACTIVE ROLE IN THE SCALE-UP PHASE

Donors are encouraged to : (1) align their reporting requirements to those of the Scheme so organisations can systematically report in the same way to all donors, reducing the reporting burden; (2) encourage their grantees to join the SEAH Harmonised Reporting Scheme, making it a marker of accountability and transparency.

LEADERS SHOULD DRIVE THEIR ORGANISATIONS TO JOIN

Leaders are encouraged to: (1) sign their organisations up to participate in the Scheme and strengthen their organisational accountability and transparency standards; (2) work with their Safeguarding teams to use the evidence and trends to improve their organisational strategies and allocate safeguarding resources based on evidence; (3) be part of a leadership movement taking action to create sector-wide transparency on SEAH.

FUNDERS MUST ALLOCATE MORE RESOURCES TO PSEAH

The Scheme is a high-impact low-cost project, but does require stable financial support to cover staff costs, platform maintenance & licenses cost, and technical accompaniment for Members. Funders interested in making a difference to improve transparency on SEAH, prevent incidents and ensure better outcomes for survivors are encouraged to contact us to discuss how they can support the SEAH Harmonised Reporting Scheme.

MORE EMPHASIS NEEDS TO BE MADE ON SEAH PREVENTION

A sector-wide shift must be made in SEAH to go beyond response and allocate resources - both staff time and financial resources to adapt programming - for SEAH prevention and risk mitigation. Learning from past incidents, together with continuous dialogue with communities, are instrumental steps in ensuring safe programming and organisational cultures with zero tolerance for SEAH.

PSEA NETWORKS MUST ALIGN WITH THE SCHEME

PSEA Networks collect data on SEA - although usually not including harassment - at the field level, with the same objective as the Scheme of producing evidence and trends. Aligning and joining forces with the Scheme, would reduce the reporting burden for partners thereby increasing membership, and give them access to advanced dashboards for data analysis tailored to their response.

ANNEX 1 HARMONISED REPORTING FRAMEWORK

1. INCIDENT LOCATION

Region / Country

2. DATE OF INCIDENT

Year / Month

3. SEX OF SURVIVOR/ VICTIM

Male

Female

4. AGE OF VICTIM/ SURVIVOR

18 and above

Below 18

5. STATUS OF VICTIM/SURVIVOR

Staff member

Community member

6. TYPE OF ALLEGATION

Sexual exploitation

Sexual abuse

Sexual harassment

7. REPORTING CHANNEL

Community-based
complaints mechanism

Community leader

PSEAH focal point

Reported to a staff from my
organisation

Reported to a staff from
another organisation

PSEAH Network or other
coordinating body

Internal complaint through
whistleblowing channel

Referral from public service
or local entry point

Other

8. PROFILE OF PERSON REPORTING INCIDENT

Staff or my organisation

Staff of other organisation

Victim/survivor

Member of survivor's/ victim's
family

Community volunteer

Other community member

Anonymous

Other

9. SEX OF ALLEGED PERPETRATOR

Male

Female

10. NUMBER OF ALLEGED PERPETRATORS

#

11. STATUS OF ALLEGED PERPETRATOR

International

National

12. PROFILE OF ALLEGED PERPETRATOR

Staff member - senior
management

Staff member - middle
management

Staff member - field staff

Volunteer

Incentive worker

Partner staff

Contractor

Consultant

Donor

Trainee/intern

Other

13. OVERALL STATUS OF INVESTIGATION

Substantiated

Unsubstantiated

Criminal case - reported to
authorities

Unconclusive

Not investigated

Other

Incident management
ongoing (open case)

14. RESPONSIVE ACTION

No responsive action possible

Subject received a warning

Subject received a sanction
(other than what is listed
here)

Subject was separated from
hiring entity as a result of
SEAH (dismissal)

Subject was separated from
hiring entity as a result of
SEAH (non-renewal)

Subject resigned or separated
before/pending investigation
(resignation)

Subject resigned or separa-
ted pending disciplinary
process (resignation)

Other

Incident management
ongoing (open case)

15. REASON WHY NO RESPONSIVE ACTION WAS TAKEN

N/A (responsive action taken
or unsubstantiated)

Victim/survivor did not give
consent

Risk for victim/survivor
deemed too high

Complainant did not
cooperate

Lack of internal capacity or
resources

No jurisdiction over allegation

No access to the area of the
incident

Insufficient information to
assess allegation

Determined not to be SEAH
(allegation reclassified)

Other

Incident management
ongoing (open case)

16. ASSISTANCE RENDERED TO THE VICTIM/SURVIVOR

Medical assistance

Mental health and
psychosocial assistance

Legal assistance

Physical protection

Economic assistance

No victim/survivor identified

Victim/survivor did not seek
assistance

No assistance available

Other

Incident management
ongoing (open case)

17. REMEDIAL ACTIONS

Training of staff or affiliated
personel

Community awareness raising

Risk mitigation measures
implemented (programs)

Risk mitigation measures
implemented (human
resources)

PSEAH action plan designed

None

Other

Incident management
ongoing (open case)

For all fields, Members may also select the following options:

Do not wish to disclose this
information

Risk of identification

Do not routinely collect this
information

Unknown for another reason

18/19. CHALLENGES & LESSONS LEARNED

Organisations can include qualitative information on challenges they have faced in managing each case or on lessons learned which can inform discussions with the community of practice

WHAT ARE THE REQUIREMENTS TO JOIN?

The only requirements to join the SEAH Harmonised Reporting Scheme are to report non-identifiable data on SEAH incidents every 6 months using the agreed-upon template and platform.

If your organisation does not yet collect all the data required by the Scheme (see [Annex 1](#)), you can start by reporting the data you have, and select "do not routinely collect this information" for data you do not collect.

WHAT IS THE YEARLY TIME COMMITMENT OF BEING PART OF THE SCHEME?

The time commitment largely depends on how advanced your organisation is in terms of SEAH data collection, and your caseload. If your organisation already has an internal database with SEAH incidents, being part of the Scheme should only take you less than an hour every 6 months, as each incident should take no longer than a couple of minutes to log into the platform.

ARE THERE ANY FINANCIAL COSTS ASSOCIATED TO JOINING THE SCHEME?

Being a member of the SEAH Harmonised Reporting Scheme is completely free. The CHS Alliance will provide you with the licenses to access the platforms. Organisations with fewer resources may also request free technical support in the form of mentoring sessions when they join the Scheme to support them in putting in place the internal processes necessary to safely collect and report SEAH data.

HOW DO I OFFICIALLY JOIN?

Contact Mathilde Belli (mbelli@chsalliance.org) and Coline Rapneau (crapneau@chsalliance.org) to express the interest from your organisation to join. If you wish, an initial information session can be organised with your organisation.

Then, an information sharing agreement will be shared with you explaining the process and rules for data sharing, to be signed by the head of your organisation. Once signed by the head of your organisation and the CHS Alliance, you will be officially part of the Scheme and will receive an induction on how to report and your credentials to log-into the reporting platform.

Do you have any other questions?

Visit our [webpage](#) or contact Mathilde Belli (mbelli@chsalliance.org) for more information