

ACKNOWLEDGEMENTS

CHS Alliance acknowledges the contributions of several individuals and organisations that made this implementation companion possible.

Research was undertaken by CHS Alliance in partnership with the Amhara Women's Association, Ethiopia, Mukti Cox's Bazar, Bangladesh, and the Women Affairs Centre (Gaza) and YWCA of Palestine (West Bank), both based in the Occupied Palestinian Territory.

We also acknowledge the piloting partners for their pioneering leadership and contributions to this project:

In Bangladesh MUKTI, PARC and SKUS

In Ethiopia WeAction and AWA

In Palestine ADWAR and PSCCW

With special thanks to Lucy Heaven-Taylor, Muna Hasan, Syed Rashed Jamal, Tiheyis Tengeda, Laura Brinks, Jonathan France, Murray Garrard and Martina Brostrom.

Design and Layout was done by GoAgency.

This companion has been developed in the context of the Closing the Accountability Gap to Better Protect Victims/Survivors of SEAH in the Aid Sector, facilitated by the Dutch Ministry of Foreign Affairs.



Ministry of Foreign Affairs of the
Netherlands

CHS Alliance

NGO Humanitarian Hub, La Voie-Creuse 16, 1202 Geneva, Switzerland

info@chsalliance.org

www.chsalliance.org +41 (0)22 788 16 41.

© All rights reserved. The copyright for this material lies with the CHS Alliance. It may be reproduced for educational purposes, including training, research and programme activities, provided that the CHS Alliance is acknowledged, and details of such use are provided to the Alliance prior to use. For elements of this report to be quoted in other publications, translated, or adapted for use, prior written permission must be obtained from the copyright owner by emailing info@chsalliance.org.

2024

CONTENTS

5 ↗
INTRODUCTION

6 ↗
DECOLONISING AND
LOCALISING PSEAH

7 ↗
A VICTIM/SURVIVOR-
CENTRED APPROACH

8 ↗
ABOUT THIS
IMPLEMENTATION
COMPANION

10 ↗
TARGET AUDIENCE

10 ↗
RELATED CHS ALLIANCE
GUIDANCE AND
DOCUMENTS

11 ↗
THE VICTIM/SURVIVOR
JOURNEY: SUMMARY
OF RECOMMENDATIONS

12 ↗
STEP 0:
VICTIMISATION

16 ↗
STEP 1:
KNOWLEDGE
OF RIGHTS

20 ↗
STEP 2:
DISCLOSURE AND MEANS
OF REPORTING

24 ↗
STEP 3:
CASE MANAGEMENT

29 ↗
STEP 4:
REFERRAL TO SUPPORT
SERVICES

34 ↗
STEP 5:
INVESTIGATION

39 ↗
STEP 6:
ORGANISATIONAL
DECISION-MAKING

43 ↗
STEP 7: REDRESS AND
COMPENSATION

46 ↗
TABLE OF
RECOMMENDATIONS

GLOSSARY

Child – any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood. **Child protection** – preventing and responding to violence, exploitation and abuse against children – including [but not limited to] commercial sexual exploitation, trafficking, child labour and harmful traditional practices. **Code of conduct** – a set of standards about behaviour that staff and volunteers of an organisation are obliged to adhere to.

Community-based Complaints

Mechanism – a system blending both formal and informal community structures, built on engagement with the community where individuals are able and encouraged to safely report grievances – including SEA incidents – and those reports are referred to the appropriate entities for follow-up.

Complaint – specific grievance of anyone who has been negatively affected by an organisation’s action or who believes that an organisation has failed to meet a stated commitment. **Complainant** – the person making the complaint, including the alleged victim/ survivor of the sexual exploitation, abuse or harassment, or another person who becomes aware of the wrongdoing.

Complaint mechanism or procedure

– processes that allow individuals to report concerns such as breaches of organisational policies or codes of conduct.

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

Focal point – a person designated to receive reports of cases of sexual exploitation, abuse and harassment, and support the organisation in implementing PSEAH. **Investigation of sexual exploitation, abuse or harassment** – an internal administrative procedure, in which an organisation attempts to establish whether there has been a breach of SEAH policy(ies) by a staff member or members.

PSEAH (Protection from Sexual Exploitation and Abuse and Sexual Harassment)

– the term used by those working in the international humanitarian and development sector to refer to measures taken to protect people from sexual exploitation, abuse and harassment by their own staff and associated personnel.

Referral pathway – the various support and referral services available to victims/ survivors of SEAH.

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

Safeguarding – the responsibility of organisations to make sure their staff, operations, and programmes do no harm to children and adults at-risk nor expose them to abuse or exploitation. This term covers physical, emotional, and sexual harassment, exploitation and abuse by staff and associated personnel, as well as safeguarding risks caused by programme design and implementation. Many organisations now also use this term to cover harm caused to staff in the workplace.

SEAH – the term used to refer to sexual exploitation, abuse, and sexual harassment. **Sexual abuse** – an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

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

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

Sexual harassment – unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating. Sexual harassment has widely been understood to relate to the workplace (see ‘Workplace sexual misconduct’ below) but is also included in the spectrum of behaviours that are not acceptable conduct by our staff, be it in the workplace or with crisis-affected people.

Survivor or victim – the person who is, or has been, sexually exploited or abused. The term ‘survivor’ implies strength, resilience and the capacity to survive. The term ‘victim’ has protective implications, as it implies the victim of an injustice which we should seek to redress. Therefore, this resource uses both terms. People who have experienced SEAH may choose different terms to describe their experience.

Trusted intermediary – a trusted, neutral and reliable third party chosen by the victim/survivor or community members that acts as a reliable, impartial link between survivors of such violence and the support systems available. This role is crucial in ensuring that survivors feel safe, supported, and believed, and that their cases are handled with confidentiality and respect.

Victim/Survivor-centred approach – an approach in which the victim/survivor’s wishes, safety, and well-being remain a priority in all matters and procedures.

INTRODUCTION

Sexual exploitation, abuse and harassment (SEAH) are among the most egregious failures of accountability in the aid sector. Rooted in gender and power inequality, SEAH is the abuse of power by aid actors (aid organisation staff and associated personnel) towards the communities they serve. SEAH causes harm to individuals, erodes the trust of crisis-affected communities, and undermines the collective integrity of the aid sector.

Significant strides have been made in addressing SEAH, with the development of principles, frameworks, policies, and tools, including the CHS Alliance PSEAH index and handbook, aimed at preventing and responding to SEAH violations.

However, aid work is about support to the individuals, and it is critical that the efforts to address SEAH are effectively meeting the needs of the victim/survivor and meet an accountability to affected person's approach.

It is encouraging to see the recent advancements in the importance of taking a victim/survivor-centred approach to PSEAH. Initiatives like the Common Approach to Protection from Sexual Exploitation, Abuse, and Harassment (CAPSEAH) and the IASC Definition & Principles of a Victim/Survivor-Centered Approach emphasise the need for tailored, inclusive, and context-specific approaches that prioritise the rights, safety, and dignity of survivors. This involves consulting with affected communities, particularly vulnerable groups, and strengthening existing community and national mechanisms to embed these principles effectively.

However, organisations and interagency initiatives continue to face significant challenges in implementing truly victim / survivor-centred approaches as it requires a fundamental shift in power dynamics— from top-down, compliance-driven approaches to bottom-up, survivor-led initiatives. This in turn requires an intentional commitment by organisations to localise and humbly learn from and partner with grassroots organisations that are the true experts in their setting and the ones survivors turn to for justice and support.

The CHS Alliance project Closing the Accountability Gap to Better Protect Victims/Survivors of SEAH in the Aid Sector was initiated to further explore these issues and examine how a victim/survivor centred approach could be practically implemented in different humanitarian settings. The project conducted a desk review into existing practice, followed by research with victims/survivors and their trusted intermediaries in three pilot countries – Bangladesh (Cox's Bazaar), Ethiopia and Occupied Palestinian Territories (OPT), representing different humanitarian operations. Recommendations for practice were developed based on this research and community consultations with local civil society actors, including women and human rights groups, GBV, PSEAH, safeguarding and protection actors. Informed by this research, locally designed VCA pilots were then tested and evaluated in all three countries. This companion is informed by the evidence and learnings from this initiative.

Under this project, local organisations established a solid foundation and demonstrated the effectiveness of the VCA approach, enriching the evidence base and implementation practices. This learning has fed into producing this companion, helping organisations not only embrace the VCA framework but also translate it into concrete, tailored, people-centred improvements, continuously refined through learning, adaptation, and meaningful engagement with those most affected.

This companion highlights that achieving real accountability involves not just policy, but practical measures and collaboration, marking a shift in both what we do and how we do it, to genuinely support and prevent harm to the communities we serve.

DECOLONISING AND LOCALISING PSEAH

Movements towards localising and decolonising the aid sector are crucial when adopting a victim/survivor-centred approach. SEAH represents abuses of power, making it essential to understand the dynamics of power within aid organisations to prevent and respond effectively to SEAH violations.

Key to addressing SEAH is recognising who holds power and why, identifying situations of abuses of power, and deconstructing the structures that sustain these power dynamics.

Approaches to PSEAH will be ineffective and inefficient if they are imported from minority world headquarters to the contexts where aid operates, without considering their relevance and applicability to local community contexts. If policies and practices

are not meaningful to local frontline staff and communities and do not centre the experience of victims/survivors, they will not be adopted, and organisations will not be held accountable. For VCA to be meaningful, it must necessarily be informed by the lived experience of victims/survivors, tailored to local contexts, owned, and driven by the leadership of communities and local actors.



A VICTIM/SURVIVOR-CENTRED APPROACH

A victim/survivor-centred approach, while upholding certain universal principles and standards, will necessarily be tailored to the context it intends to impact. Many of the findings from this project indicated a preference in communities for SEAH to be addressed through their own community institutions and structures or at the very least in close coordination and partnership with them. These structures although imperfect, are seen as known, trusted, and familiar, and in some cases mandated to handle SEAH.

To be truly victim/survivor-focused, organisations should start with a focus on people. This will require an intentional mindset shift and may necessitate organisations challenging existing standards, policies, and practices to evolve towards a more meaningful victim/survivor-centred approach. The sector will also need to consider the different challenges, strengths, assets, and opportunities in the locations it operates.

Involving local institutions and community structures in PSEAH may appear to challenge existing practices of aid organisations, both in terms of due process and protection risks to victims/survivors, especially when involving institutions that have shown harmful practices related to gender-based violence. However, if the organisation is to respect and honour the needs, rights, and wishes of victims/survivors, exploring these options may be necessary.

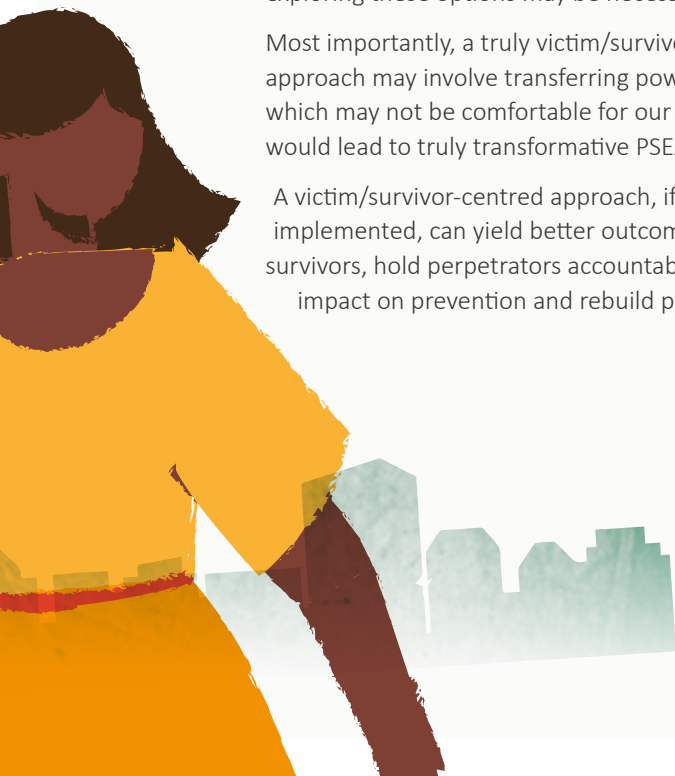
Most importantly, a truly victim/survivor-centred approach may involve transferring power to others, which may not be comfortable for our sector but would lead to truly transformative PSEAH.

A victim/survivor-centred approach, if correctly implemented, can yield better outcomes for survivors, hold perpetrators accountable, have an impact on prevention and rebuild public trust.

Victim/survivor centred vs victim/survivor led approaches

- **Victim/survivor-centred approach:** an approach in which the victim/survivor's wishes, safety and well-being remain a priority in all matters and procedures.
- **Victim/survivor-led approach:** An approach that equips and empowers survivors to take a leadership role in their own life

The aid sector tends to focus on a victim/survivor-centred approach, rather than a victim/survivor-led approach. This can sometimes be because a victim/survivor-led approach is incompatible with organisational accountabilities and responsibilities on harm prevention. For example, if the perpetrator is a member of staff (or associated personnel) of an organisation, the organisation may be legally and procedurally obliged to follow due process not always compatible with victim/survivor-led decision-making.



ABOUT THIS IMPLEMENTATION COMPANION

This Implementation Companion is structured around the stages of an SEAH case, aiming to orient organisations through the victim/survivor's journey from victimisation to redress. At each stage, this companion considers what can be done to make organisational practices more victim/survivor-centred. However, it is important to note that each victim/survivor and each case are different, and organisations may have different processes for dealing with cases.

This companion calls for improvement in PSEAH practices, urging organisations to reconsider their approaches in favour of evidence-based, sustainable practices that prioritise victims/survivors' rights and well-being. Adopting a Victim-Centred Approach (VCA) can significantly impact institutions' and collective PSEAH efforts.

This companion does not aim to provide a comprehensive approach to due diligence in responding to reports of sexual exploitation, abuse, or harassment. Existing guidance on best practices for preventing, enabling reporting, and responding to SEAH can be found [here](#).

This companion is centred around the following sections:

- **Learning from Victim/Survivors and Communities** derived from VCA Needs Assessments conducted in the three pilot countries, as well as other research, where indicated.
- **Recommendations** adjusted from the Closing the Gap Foundational Paper on Victim/Survivor-Centred Approaches to SEAH in the Aid Sector, following field testing.
- **Victim-Centered Approach in practice** use and implementation of research findings in real-world settings, consolidated lessons from pilots conducted in the three countries.
- **Indicators** used to quantify and measure progress, performance, or outcomes



VICTIMISATION



KNOWLEDGE OF RIGHTS



DISCLOSURE AND REPORTING



REFERRAL TO SUPPORT SERVICES



CASE MANAGEMENT



REDRESS & COMPENSATION



INVESTIGATION



ORGANISATIONAL DECISION-MAKING

TARGET AUDIENCE

This companion is relevant for organisations in the humanitarian sector and in peacekeeping and development cooperation. It primarily serves staff aiming to implement Victim/Survivor-Centered Approaches (VCA) to the Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) in aid operations. It also provides high-level guidance on VCA to PSEAH for:

- National and Regional Programme Managers
- Decision-Makers in Organisations
- Programme Staff and Managers at the national and subnational levels
- Donors committed to ensuring a VCA to PSEAH in the organisations they fund
- Staff of Partner Organisations implementing projects and programmes
- Supporters of Gender-Based Violence (GBV) and Violence Against Women (VAW) Programmes within their settings
- Consultants and Researchers at research institutes involved in efforts to improve PSEAH

RELATED CHS ALLIANCE GUIDANCE AND DOCUMENTS

- [Victim/Survivor-Centred Approach to Protection from Sexual, Abuse, Exploitation and Harassment in the aid sector: Foundational Paper](#)
- [PSEAH Handbook](#)
- [CHS Alliance PSEAH Index e-learning](#)
- [Whistleblower Protection Guidance](#)
- [SEAH Investigation Guidance](#)
- [Managing Complaints Package](#)



**THE
VICTIM/SURVIVOR
JOURNEY:
SUMMARY OF
RECOMMENDATIONS**

A stylized illustration of three people in a yellow and orange color palette. On the left is a woman with curly hair, wearing a dark top and a skirt. In the center is a woman wearing a hijab and a dark top. On the right is a man with short hair, wearing a dark long-sleeved shirt and dark pants. The background features a large, light yellow circle with a darker yellow ring inside it. The overall style is flat and graphic.

0.

VICTIMISATION

VICTIMISATION

WHAT'S HAPPENING WITH THE VICTIM/SURVIVOR

SEAH is perpetrated against the victim/survivor. This could be a one-off incident, or something that happens over an extended length of time.

WHAT'S HAPPENING IN THE ORGANISATION

The organisation should be learning about risk and trends in SEAH in the context where they are working.

In the aid sector, SEAH refers to sexual exploitation, abuse, or harassment perpetrated by personnel associated with humanitarian, development and peacekeeping responses. It can take many forms but is fundamentally based on abuse of power. Any sexual contact or behaviour involving a child is always classified as sexual abuse.

Victims/survivors are not a homogeneous group or category of people. Each individual must be considered as unique. Victimisation is a complex process involving several stages that impact people differently. Individuals may experience and express different feelings at different points in time, which

affects their choices and actions. Being a victim/survivor is a life-changing and unwanted experience. This requires that actors involved with victims/survivors of SEAH refrain from making assumptions about needs and instead respect the voice and choice of victims/survivors.



LEARNING FROM VICTIMS/ SURVIVORS AND COMMUNITIES

What Perpetration Looks Like in Different Contexts

In **Ethiopia**, humanitarian aid workers in Internally Displaced People (IDP) camps were identified by respondents as potential perpetrators of SEAH. Harassment and Exploitation were often found to be normalised, and the community did not consider reporting it.

“A man came here to vaccinate us against Covid, and then misbehaved with one of the young girls; we beat and chased him out of the camp and asked him never to return”.

COMMUNITY MEMBER, AMHARA

In **Cox’s Bazar, Bangladesh**, local volunteers involved in the humanitarian response were found to be the most likely perpetrators. Camp members entered relationships with these volunteers, hoping that they would become formalised. Although the relationships were based on a power imbalance due to the humanitarian volunteer’s access to resources, the camp residents did not consider themselves to be victims.

In **OPT**, some individuals also did not see themselves in the common framing of ‘victims’.

“I wanted justice and protection and I know they do not provide that...I do not think I am part of their target group. They seem to service “vulnerable and marginalised women” and “women in rural areas”. I have a lot of respect for women from rural areas; they endure so much. But the way women’s organisations here talk about their beneficiaries makes it feel they only service underprivileged and poor women.”

VICTIM/SURVIVOR, JERUSALEM

In **OPT**, perpetrators may be individuals who are closely connected with the victim/survivors, such as spouses, relatives or neighbours. This dynamic is particularly prevalent in Gaza, where a considerable number of community members are also engaged in humanitarian response efforts.

Also, in **OPT**, the cash transfer system of delivering assistance generated new forms of perpetration. Due to the lack of humanitarian access to the population, cash transfer systems are being utilised, whereby selected members of the crisis-affected receive codes on their phones, which they then use in the nearest shops to retrieve the money. These selected individuals are typically at risk or vulnerable, which increases opportunities for exploitation by shop staff.

RECOMMENDATIONS

- ✓ Organisations should collect and analyse data on how and where SEAH perpetration commonly occurs in their setting.
- ✓ Methodologies should include conducting and utilising existing research and consulting with crisis-affected people and groups at risk of SEAH, organisations and individuals who work on related issues in the context.
- ✓ Trusted civil society intermediaries should act as a liaison between victims/survivors and the organisation throughout the PSEAH process, if required.

VCA IN PRACTICE

In **Cox's Bazar**, a community consultation was planned to learn about SEAH reporting and complaints mechanisms. As part of the process, the researchers first needed to find ways to introduce this sensitive subject and discover the types of perpetrations that were occurring.

Members of the Rohingya community can experience challenges in discussing these issues, due to cultural, religious and political sensitivities.

Mukti

Mukti Cox's Bazar is a local NGO with extensive experience in Cox's Bazar. Their vision is a peaceful universal society free from poverty and prejudice where people live in dignity and security. The organisation works on community development with projects, such as community empowerment, gender justice and diversity, human rights and legal aid, education and more.

The consultation was implemented by Mukti Cox's Bazar. The consultation team took time to build trust by asking the community what challenges they had

faced, and what changes they would like to see. A consultation methodology was developed that approached the issue of SEAH gradually. Volunteer facilitator training included confidentiality and how to approach sensitive issues. Case studies, based on real cases from their setting, were developed to share with members of the community in the consultation, which unpacked issues of exploitation. Additionally, the consultation team used role play to communicate these case studies and stimulate discussion. Volunteer facilitators worked in groups of three: two facilitators- the enumerator and note-taker - conducted the role play, while one managed the discussion. With this methodology, the consultation was able to generate rich information and derive learning about how perpetration occurs, including the example used in the above section on learning from victim/survivors and communities.

Indicators Victimisation

- Number of SEAH incidents reported by locality
- Number of aid organisations, government and other agencies reviewing and updating PSEAH policies and codes of conduct

An illustration of a family of four holding hands in a circle. A man with a beard and red hair stands on the right, wearing a blue t-shirt and dark pants. A woman with red hair stands on the left, wearing a blue dress. In the foreground, a young girl with red hair and a blue dress holds hands with a boy with red hair and a blue dress. The background features a large, glowing yellow circle on a dark blue background.

1. KNOWLEDGE OF RIGHTS

KNOWLEDGE OF RIGHTS

WHAT'S HAPPENING WITH THE VICTIM/SURVIVOR

The victim/survivor may consider reporting SEAH

WHAT'S HAPPENING IN THE ORGANISATION

The organisation disseminates awareness raising materials and activities, to inform communities of their rights with respect to SEAH, and how they can raise concerns and report misconduct

This Companion primarily cover how to implement a victim/survivor-centred approach once SEAH perpetration has occurred. However, ensuring a wide understanding of the rights of staff and communities is essential to all areas of practice of PSEAH, as this makes clear what they should expect in terms of the conduct of aid workers, what their rights are, and how they can report any concerns. Knowledge of Rights encompass all forms of communication, whether it be through written information, education and communication materials, meetings and discussions, broadcasting, social media, or other interactions with communities and individuals.

LEARNING FROM VICTIMS/SURVIVORS AND COMMUNITIES

How communities prefer to communicate

Posters and leaflets are not always the preferred choice of communication, and communities have varying access to technology. In **Cox's Bazar**, public awareness through door-to-door visits and one-on-one discussions has been identified as the most effective method for raising awareness. These activities involved case studies and role plays to stimulate discussion on the issues.

In **OPT**, the need for professional content creators was identified to communicate success stories of women who reported SEAH and received justice and protection. These content creators would have a keen understanding of the nuances of language and

storytelling required to help rebuild trust in PSEAH mechanisms.

Ethiopia has made significant progress in raising awareness about sexual exploitation, abuse, and harassment (SEAH) by integrating it into the fabric of community life. Traditional gatherings, like coffee ceremonies, serve as forums for open discussions. These discussions introduce key Amharic terminology related to SEAH and empower participants to understand the rights of victims and survivors, including available reporting channels. Radio programmes complement these efforts by broadcasting vital information to a wider audience about available reporting channels, case management during investigations, and referral linkages for victims/survivors.

RECOMMENDATIONS

- ✓ Awareness-raising activities on SEAH are based on communities' own knowledge and understanding of exploitation and abuse of power and use language and examples from their lived experience.
- ✓ Awareness-raising materials and activities should not only comprise written materials but consider what communications model will resonate with the audience in that context. This might be other means of storytelling such as visual arts, role play and drama, and means of delivery such as radio, personal interaction, or social media.

VCA IN PRACTICE

In OPT, the organisation ADWAR developed a project to raise awareness of PSEAH through working with men as allies. As part of the project, men were identified who had some form of authority, such as traditional leaders and senior family members, and who also shared the values of the project. The resulting network was named the Men's Alliance.

ADWAR

ADWAR (Roles for Social Change Organisation) is an NGO working in Palestine. Their mission is that Palestinian women, young women and girls are citizens of a democratic, free and cohesive civil society that is based on respect for the principles of human rights and social justice and leaving no one behind. Their projects include economic, political and social development, and work on gender issues.

Members of the Men's Alliance developed their knowledge and skills about the importance of the PSEAH policy in preventing men who provide humanitarian and development services from exploiting at-risk women and girls. This included men providing humanitarian and development services in all aspects of the response, including governmental, civil and international organisations.

This led to individual initiatives by members of the Men's Alliance to further raise awareness. For example, members of the Men's Alliance in Alkhader in Bethlehem raised slogans during football matches with affiliated local football academies, such as 'No to Violence against Women', 'Together to Stop Sexual Exploitation and Abuse', and others.

The capacity-building programme also targeted government and civil society organisations and saw a change in attitudes and policy as a result of its campaigning. One example of this was the municipality of Khallet-Al-Mieh, Massafer Yatta, south of Hebron. The municipality officially adopted PSEAH policy and implemented it within their systems.

In **Ethiopia**, despite many years of PSEAH interventions by aid organisations, awareness among communities of their rights in terms of SEAH was found to be low. The pilot project addressed awareness-raising by mobilising community members who had trust and outreach in their community to spread PSEAH messaging. The project worked through a Community Action Group, which cascaded awareness-raising through a structure of sub-committees. Committee members were selected by the communities and were given training on victim/survivor-centred approaches, and how to deal with disclosures. To ensure coordination with aid organisations, the Committees met with NGO Focal Points on a bi-weekly basis.

The committees-built trust by utilising existing activities where women already gathered, to open dialogue on SEAH issues. One of these was the coffee ceremony, which is a significant community activity in Ethiopia. The committee members first discussed SEAH with the women, and how it was articulated in their own language of Amharic. They then discussed what the existing reporting mechanisms were for SEAH, what the challenges were, and how the women would like to raise SEAH issues with the aid organisations.

The project also worked with a mass media agency to produce messages via radio, informing communities what their rights were in terms of SEAH, and what is meant by a victim/survivor-centred approach. These messages were broadcast daily. The result was an increase in awareness in communities in terms of their rights regarding SEAH.

In **Bangladesh**, volunteers and field facilitators were deployed to conduct household visits aimed at raising awareness on PSEAH. Using IEC materials and role-playing, they generated discussions about the gaps in understanding PSEAH commitments of aid

organisations, the processes for proper redressal, and how community and women's representatives, along with government authorities in the camps, are involved in achieving the desired outcomes for survivors. Mukti Cox's Bazar utilized a group of 10 volunteers, SKUS had 3 field staff and a volunteer, and PARC employed 2 facilitators and a volunteer. These efforts collectively increased the knowledge of over 10,000 community members, identified trusted community actors for handling sensitive complaints, and addressed gaps in the current formal Complaints and response management system.

Indicators Knowledge of Rights

- Number of community members sensitized on PSEAH (by type of outreach- in-person one-to-one, group sessions, mass communication)
- Percentage of community members reached with enhanced awareness of SEAH, their rights, and reporting channels



2.

DISCLOSURE AND REPORTING



DISCLOSURE AND REPORTING

WHAT'S HAPPENING WITH THE VICTIM/SURVIVOR

The victim/survivor, discloses SEAH to the organisation, or a third party

WHAT'S HAPPENING IN THE ORGANISATION

If disclosing to a third party, the report is referred to the organisation

The organisation receives the report

Disclosure is when a victim/survivor tells someone about the SEAH they have experienced. This can be verbal, but can also be non-verbal communication, for example, in young children or people living with disabilities. Disclosures can also happen through other means, such as in writing, through diagrams, or through electronic communication such as e-mail, WhatsApp or other social media.

Reporting refers to bringing an SEAH concern to the attention of the aid organisation. Sometimes the victim/survivor reports, but others might also report, for example, if the victim/survivor has disclosed to them, or they have seen or heard something that concerns them.

Most aid organisations have internal procedures for following up on SEAH reports. Some also utilise external pathways or individuals and communities to inform them of SEAH and other concerns and complaints. These processes are often called Community-based Complaints Mechanisms (or similar). They intend to provide ways to report that are safe, accessible and appropriate, designed in consultation with communities.

LEARNING FROM VICTIMS/SURVIVORS AND COMMUNITIES

Concerns with Reporting to Aid Organisations

Communities and victims/survivors have reduced trust in aid organisations to handle reports of SEAH, as it is their staff who are the perpetrators. In **OPT**, communities identified the need to prove to the

victim/survivor that this is an isolated incident and that aid organisations do not tolerate this behaviour.

“Such an incident breaks a victim’s trust not only in the harmful organisation, but her trust in all aid organisations breaks down as a result.”

PARTICIPANTS FROM HEBRON

This was also reflected in **Cox’s Bazar**, where communities identified a lack of trust to disclose to a humanitarian worker when the perpetrator was a humanitarian worker themselves. Communities in Cox’s Bazar also noted the high level of inconvenience, lack of anonymity, and expressed privacy concerns with formal reporting mechanisms.

In **OPT**, another issue was identified in reporting to aid organisations – there was a concern that approaching staff members identified by the organisation as appropriate to receive SEAH cases would identify the complainant as reporting a sexual incident.

Preferred Structures to Handle SEAH Disclosures and Reports

In **OPT**, victims/survivors stated that they often prefer to disclose in clinics or healthcare settings due to perceived privacy and confidentiality. In **Cox's Bazar**, Shantikhana (MHPSS at a health centre) is popular and was identified as a potential interlocutor for SEAH cases.

Communities in **Cox's Bazar** stated a preference for a female Majhi (political leader) or, if the Majhi is male, his wife or any of the female household members of the Majhi to receive reports of SEAH. In some camps, the Imam (religious leaders) were found to enjoy more trust and credibility, and in others, the female representatives of the community had an upper hand.

In **Ethiopia**, communities expressed a preference for existing mechanisms such as Anti-Harmful Traditional Practices Committee or Social Accountability Committee, as these already have a foundation of trust and co-operation. Other existing channels

mentioned included the Department for Women and Children Social Affairs, health extension workers, police and kebele (district) social workers. Victim/survivors also noted that they would prefer to be kept updated on their case by the first person they interacted with.

In **Cox's Bazar** and **Bhasan Char**, community members prefer to disclose SEAH incidents to well-known individuals within their communities who share their language and culture. However, they emphasise the need for these individuals to be trained on how to proceed once a disclosure is made. Additionally, certain camp-based aid workers, such as midwives, teachers, and nurses, are trusted by the community even though they are not part of the formal Complaints and Response management system. These individuals enjoy greater acceptance from the community compared to formal channels.

All locations also strongly recommended selecting and recruiting community members to receive reports and raise awareness.

RECOMMENDATIONS

- ✓ Organisations recognise that the burden of reporting SEAH should not be placed on survivors and communities. They are more proactive in analysing SEAH risk and proactively identifying where perpetration is occurring.
- ✓ Organisations are aware that disclosures may be made through any means, not just designated staff and reporting channels. Some of these means may be external to the organisation.
- ✓ Organisations recognise the role that trusted intermediaries play in reporting SEAH, both within and external to the organisation, and work with them on receiving and handling disclosures, making referrals and facilitating access to support services.
- ✓ Organisations have community based PSEAH Focal Points in place that replicate this 'trusted intermediary', who have received training where necessary, that is appropriate and meaningful to them. These might not always be staff members but may be members of the community where this has been identified as preferable by the community.
- ✓ Staff who are likely to come into contact with members of the community have at a minimum basic training on how to receive a disclosure. This should include how to respond in a way that prevents further traumatising, and how to appropriately refer the disclosure within the organisation.
- ✓ Any reporting channels in place are designed in consultation with different groups in communities and are safe, accessible, appropriate and confidential. Multiple channels should be provided, that are tailored for different groups in the community. However, the organisation should not rely solely on these channels to bring SEAH to their attention.

VCA IN PRACTICE

To address these issues, the project consulted with communities to identify individuals to whom survivors turn for SEAH issues. These were individuals who already held a position of trust and power within the community. These trusted intermediaries were not the same for each camp – in some camps, the Majhi was chosen, in others, it was someone different. The trusted intermediaries were trained in how to handle disclosures, how the humanitarian system worked, and what services were available to victims/survivors, as well as how to engage in the PSEAH process on behalf of the victims and negotiate for the survivor's behalf.

The trusted intermediaries not only conveyed reports on behalf of the community but also proactively visited vulnerable and at-risk community members. They listened to rumours, checked in on women in households, and conducted awareness-raising activities with community volunteers. This outreach approach proved to be more convenient for the women in the camp.

In some sub-camp areas, women and girls face challenges accessing reporting mechanisms and support services. They may not be allowed by male community members to go out alone. Going out alone may also expose them to risk from armed groups. Trusted intermediaries can address this challenge by accessing reporting mechanisms and support services on behalf of these women and girls.

The trusted intermediaries act on a voluntary basis and do not receive payment. Nonetheless, they are enthusiastic, outspoken, and keen to learn, and there has been a constant demand for their capacity development. The mapped trusted intermediaries in the camps have received capacity-building training on receiving disclosures and on the next steps to take when reaching out to service providers for SEAH survivors. They are aware of where to visit inside the camps for feedback from the organisation and have the necessary information out the PSEAH Focal Point of aid organisations.

Furthermore, leaders of the community and women representatives were also identified and trained in the PSEAH processes and how they can engage to ensure proper services and outcomes for the survivors. The women representatives regularly meet the service providers at the camp and maintain a good working relationship.

SKUS

SKUS (Samaj Kalyan O Unnayan Shangstha) is a non-profit, non-government and non-political voluntary women-headed development organization. with a vision to improve the socio-economic condition of the poor, marginalized and unprivileged, and to remove discrimination and all kinds of exploitation, abuse and harassment in Bangladesh.

In **Bhasan Char**, based on grassroots-level experience, PARC found that religious leaders enjoy considerable authority and respect in the community. They have capacitated the female household members of the Imam and the Majhi. Watchdog committees have been formed, informing PARC of SEAH trends and updating community actors to better prevent, protect, and respond to SEAH.

The result is that the trusted intermediaries began to receive disclosures and were even asked to resurrect cases from before the project period started.

Indicators Disclosure and Reporting

- Number of new SEAH reporting mechanisms introduced (formal/informal) – PSEAH focal points, community action groups, hotlines, etc.
- Number of community intermediaries, aid workers, government and other agency officials trained/ capacitated in VCA approach to PSEAH (disclosure and reporting)
- Percentage increase in community members who trust PSEAH reporting mechanisms
- Percentage increase in SEAH incidents reported

3.

CASE MANAGEMENT



CASE MANAGEMENT

WHAT'S HAPPENING WITH THE VICTIM/SURVIVOR

The victim/survivor is contacted by the organisation (if their identity is known)

WHAT'S HAPPENING IN THE ORGANISATION

The organisation

- documents the report or disclosure
- decides how to follow up on the report
- initiates its case management procedures if a case is opened

Case management means assessing and implementing relevant support to a victim/survivor of SEAH. Case management procedures ensure everyone understands the steps in dealing with safeguarding/SEAH incidents and allegations, including referral of criminal matters to national authorities as necessary and appropriate. These procedures must be informed by the local legal and social welfare context for protection. That includes details of referral pathways in relation to (for example) national authorities, and survivor services.

In the aid sector, case management specifically means the aid organisation's response to a report of SEAH. This includes confidentially documenting and storing all information relating to the case, referring victim/survivors to relevant services, decision-making within the organisation, and taking action which can include disciplinary measures.

Some aid organisations use case management software. These software packages usually comprise a platform that enables the organisation to log reports and store case information securely with access to relevant staff members. Some of these case

management systems also allow for staff and external individuals to report SEAH and other concerns, through secure e-mails and sometimes manned telephone hotlines.

This section will look at overall management and co-ordination of an SEAH case in an aid organisation. Following sections will focus specifically on referral to support services, and administrative workplace investigations, as these areas of case management often come with specific challenges in implementing a victim/survivor-centred approach.

LEARNING FROM VICTIMS/ SURVIVORS AND COMMUNITIES

Preference for Familiar Channels- Despite Issues

All pilot locations raised the issue of trust in who manages an SEAH case. Many stated that they would prefer to use familiar channels, both formal and informal, such as traditional leadership or the police or civil authorities when dealing with SEAH cases—even when humanitarian staff were the perpetrators.

This is not to say that communities didn't have significant concerns about these structures and their appropriateness and ability to deal with cases involving SEAH. In **OPT**, major issues were raised with traditional leadership over women's and girls' rights, prioritising men in outcomes, and the potential for corruption. There was also mistrust in the police and judiciary. In **Cox's Bazar**, communities were concerned that religious leadership are often driven by their own interests and have no accountability. However, despite these concerns, these structures were still seen as preferable to aid organisations handling cases of SEAH. For all their potential flaws, communities were more familiar with these structures, and identified some advantages: for example, the police are mandated to enforce a response to GBV cases, and religious leaders have oaths that bind them to confidentiality.

In contrast, aid organisations' processes were seen as opaque, and communities in **OPT** observed that they had not acted on previous (non SEAH) complaints, so trust in them to deal with sensitive SEAH cases was low. Most importantly, when it was staff of the organisation who had caused the harm in the first place, there was no trust in the organisation to solve the issue.

There were many recommendations on how to make existing structures safe and appropriate for handling SEAH cases, from sensitisation and awareness raising, to holding such entities to account for their practices. In **OPT**, some people suggested that women's organisations could work together with traditional structures to ensure a survivor-centred approach. In **Ethiopia**, suggestions for case handling included the Amhara Women's Association, and Ethiopian Lawyers Institution.

Humanitarian structures are seen to be imposed

In the pilot countries, staff working for aid organisations reported feeling pressured to participate in PSEAH processes that were imposed on them by others.

In **OPT**, staff discussed the fear of pressure from donors to take specific actions that they thought were not appropriate for the context.

**“that works in Europe, but it does not
work in Palestine”.**

PROGRAMME MANAGER, OPT

In **Cox's Bazar**, staff recommended that Inter-Agency PSEAH mechanisms should include other stakeholders functioning under camp authority. A staff member in **OPT** reported feeling coerced into signing standard reporting mechanisms for SEAH.

RECOMMENDATIONS

- ✓ Victim/survivors are treated as unique individuals who are experts in their situation. This may include supporting victim/survivors to access external institutions, structures, and processes, including traditional leadership.
- ✓ Organisations' internal reports handling and case management systems are designed with vulnerable and at-risk groups in mind, such as children, people of different SOGIE (sexual orientation or gender identity expression), people living with disabilities, and male survivors.
- ✓ The victim/survivor's consent is sought before proceeding with a SEAH report. When victim/survivor does not consent, the organisation balances its decision making with the risk that the perpetrator may be posing to people they come into contact with, and considers alternative actions where possible
- ✓ Organisations are honest with the victim/survivor about what will happen if they wish to proceed with a report of SEAH. The case management and investigation processes are outlined, including how decisions are made on the conclusions—and the limitations on what may be possible in terms of disciplinary procedure of the perpetrator. The victim/survivor is able to make an informed decision on what they consent to in the process.
- ✓ Victim/survivors are provided with support for as long as it is needed, at the pace of the victim/survivor.



VCA IN PRACTICE

In **Cox's Bazar**, the trusted intermediary network helps victim/survivors to navigate the case management process. This includes working closely with stakeholders such as the PSEA Network, local magistrates, and local service providers.

To link the trusted intermediaries with service providers, the pilot project convened a joint workshop to which all GBV and SEAH service providers in the project area were invited. The purpose of the workshop was to show what both the trusted intermediaries and the service providers were doing, act as an 'icebreaker' between them, and facilitate a joint working relationship.

To link the trusted intermediaries with service providers, the pilot project convened a joint workshop to which all GBV and SEAH service providers in the project area were invited. The purpose of the workshop was to show what both the trusted intermediaries and the service providers were doing, and act as an 'icebreaker' between them, and facilitating a joint working relationship.

PARC

PARC (Rehabilitation Centre for Prostitutes and Rootless Children) is a renowned Non-Governmental Organization (NGO) in Bangladesh working for the development of vulnerable groups and in the realm of gender, human rights and good governance, sex workers' rights and rehabilitation, child rights and education. PARC aims to ensure good governance through participation, accountability, and transparency at all levels to foster dignity.

In **Bhasan Char**, community PSEAH focal persons were appointed and trained to collaborate with service providers and the case management team, advocating for the concerns and sensitivities of victims/survivors. They highlighted issues such as victim-blaming, belittling, and confidentiality concerns, emphasising the utmost respect for the well-being of survivors.

Indicators Case Management

- Number of community intermediaries, aid workers, government and other agency officials trained/capacitated in VCA approach to PSEAH (case management)
- Number of SEAH cases managed
- Percentage increase in victims/survivors satisfied with SEAH case management process



4.

REFERRAL TO SUPPORT SERVICES



REFERRAL TO SUPPORT SERVICES

WHAT'S HAPPENING WITH THE VICTIM/SURVIVOR

The victim/survivor accesses any support services they might wish to use. This may take place immediately, or later, and may last any amount of time according to the survivor's needs

WHAT'S HAPPENING IN THE ORGANISATION

The organisation supports the victim/survivor to access any support services they may wish to use. If the victim/survivor is a child, referrals will be made in the best interests of the child.

Victim/survivors in SEAH cases should always be supported to access support services, should they choose to do so. Services can include medical, psychosocial, transportation costs, and legal support. Referrals can also be made to law enforcement, if the victim/survivor wishes.

If the victim/survivor is a child under the age of 18, referrals made by the organisation will be guided by the best interests of the child.

These referrals are part of due process in dealing with reports of SEAH and are separate from the organisation's own internal procedures to address the report. Many organisations work to advocate for and provide support to victim/survivor support services, usually in their protection, child protection, gender or gender-based violence programming. PSEAH practice is different in that there is additional accountability for the organisation to address, as the perpetrator is their staff member or associated personnel.



LEARNING FROM VICTIMS/ SURVIVORS AND COMMUNITIES

Ideas for Accessing Support Services

In the pilot contexts, communities observed that support services are not always available, or can be inaccessible or not considered safe or confidential.

Some ideas for addressing challenges in different contexts included:

- Recommendation from **OPT** for online support services, such as online support groups, virtual counselling, and digital self-help resources tailored to specific needs of survivors.
- In **Cox's Bazar**, support services were not always open at all hours. Health centres were identified as easy point of access for referral to support centres, as they are open 24/7.

Both locations recommended provision of transport to the required services.

RECOMMENDATIONS

- ✓ Comprehensive support service mapping is undertaken before an SEAH case is reported. Services are identified that are safe for victims/survivors, particularly those who may be at increased risk. Services that are mapped take local context and custom into account. Support service mappings are shared between organisations and should be regularly updated.
- ✓ Victims/survivors are proactively assisted to access services, should they wish to. This should take place at the victim/survivor's pace, even if this does not fit with organisational case management and investigation timeframes.
- ✓ Cases involving children under 18 are always referred to appropriate services when it is safe to do so.



VCA IN PRACTICE

The **OPT** pilot worked with PSCCW, who are an NGO working on psychosocial support for women throughout the West Bank. The project addressed how support services could be more victim/survivor centred. The project centred on developing a holistic approach to providing support to victim/survivors, including accompaniment throughout the process, at the victim/survivor's pace.

PSCCW

PSCCW (Psychosocial Counseling Center for Women) is a women's organization that has been working in the West Bank and East Jerusalem since 1997 with focus on area C, H2 in Hebron and the Jordan Valley. PSCCW provides specific services for GBV survivors as a main target group, MHPSS services, legal aid, economic empowerment, and awareness-raising. In addition, PSCCW advocates for the rights of the most marginalised groups through partnerships in coalitions and networks. Furthermore, PSCCW conducts capacity-building activities to improve the quality of the services provided to women, youth and children as well as effective policies and regulations used by Governments and NGOs. PSCCW also establishes safe spaces for women & girls 'SCWG' which aim to promote women's protection and empowerment and help mitigate the risk of GBV.

The project provided both individual and group counselling, to provide tailored support to victim/survivors. The group therapy was introduced to provide victim/survivors with a supportive environment to share their experiences, learn from others, and build coping skills. These sessions promote healing and resilience among survivors. Specifically, women in Gaza, who have endured the ravages of war, expressed their pain and fears in these sessions. Many recounted experiences of degradation, where basic services like restroom use, food access, and other necessities are withheld unless they submit to exploitation. Through these therapy sessions, they learnt self-defence techniques and effective communication methods, empowering them to assert their rights and protect themselves from further harm.

The project also provided access to legal consultations, medical aid and shelter. The legal aid in particular was observed as important, as it had the added benefit of making the victim/survivors feel that their case was important and was being taken seriously. (See section on redress and Compensation)

Small grants of around \$100 per case were also provided to specific individuals in severe cases, where the victim/survivor's vulnerability had made them more at risk of exploitation, for example, if they didn't have access to food or medicine. The money helped to reduce this vulnerability.

In **Bangladesh**, authority figures such as Majhi were trained on referral. The Majhi are present in the camp during evenings and weekends, so can always be available to help with referrals.

In **Ethiopia**, one implementing organisation, the WE-Action took a leading role in mapping referral linkages within IDP camps.

This option focused on understanding the specific services offered by various organisations in the camps and ensuring that they are accessible, and victim/survivor-centred. The outcomes were enhanced visibility of services and a comprehensive overview of support options accessible to victims and survivors such as psychosocial support, nutritional assistance, legal aid, and counselling. The intervention also improved the referral system by establishing efficient referral pathways among organisations. This ensured that survivors could be connected with the most suitable services tailored to their individual needs.

WE-Action

WE-Action (Women Empowerment Action) is a feminist women's rights organisation, established 2003 working towards a "gender Just Ethiopia" and operating across eight zones in three Ethiopian Regions, Amhara, Southern Nations, Nationalities, People's region (SNNPR) and Oromia. Their mission is to empower both women and men to achieve gender equality and build sustainable livelihoods. Their work prioritises strong female leadership.

In **Cox's Bazar**, efforts have sensitised community volunteers involved in support services to better uphold confidentiality regarding cases they encounter, while also ensuring adequate protection of survivors from circulating rumours within the camps.

In **Bhasan Char**, trusted intermediaries and community PSEAH focal persons have been capacitated on available service provisions and informed about organisational reporting points to hold service providers accountable.

Indicators Referral to Support Services.

- Number of referral networks expanded holistically/ increase in number of agencies within referral networks
- Number of victims/survivors provided with psycho-social support/health/livelihoods/other support
- Increase in personal well-being of victims/survivors (qualitative assessment)



5.

INVESTIGATION



INVESTIGATION

WHAT'S HAPPENING WITH THE VICTIM/SURVIVOR

The victim/survivor is contacted by the organisation to inform them of a potential investigation and ask their consent.

The victim/survivor may participate in the investigation by providing interview testimony or evidence.

WHAT'S HAPPENING IN THE ORGANISATION

The organisation undertakes an investigation, if appropriate.

As discussed in the previous section, PSEAH practice differs from GBV programming, in that the organisation is accountable for the actions of the perpetrator. Part of this accountability can include undertaking an administrative investigation into concerns raised regarding staff members or associated personnel.

Note that organisational SEAH cases do not always result in an investigation. An investigation is not always necessary to hold the perpetrator to account, or to provide redress to the victim/survivor. In some cases, it will be clear that perpetration has occurred, so an investigation will not be necessary. In some cases, reports will be referred directly to law enforcement.

An investigation will typically occur when a report indicates a violation of organisational PSEAH policy, and additional information is needed to determine whether policy was breached.

A SEAH investigation is a workplace administrative investigation, to determine whether organisational PSEAH policy has been breached. If the report alleges criminal activity, it should be referred to the relevant local authorities. However, in some circumstances, the organisation may decide not to refer to local authorities, if it is not safe for the victim/survivor to do so.



LEARNING FROM VICTIMS/ SURVIVORS AND COMMUNITIES

Lack of Trust in Aid Organisations to Investigate Themselves

This issue was summarised in the **Cox's Bazar** pilot: it is very unlikely that victims/survivors would participate in an aid organisation's investigation, due to lack of trust.

In **OPT**, all participants agreed that aid organisations are not equipped with the required expertise and training to conduct investigations. Many thought that even if these organisations were well-trained to conduct investigations, they lacked the mandate and resources to do so effectively. Moreover, it was also noted that running investigations requires more than just investigative skills. Organisations need to be prepared to face potential risks and pushback from community members. If they are not equipped to manage these dynamics, they could jeopardise their entire relationship with the community.

This was echoed in the other locations.

“I don't believe that development and aid organisation workers fulfil the necessary requirements to conduct investigation[s]. They lack experience, training, and proper educational backgrounds.”

PARTICIPANT FROM DEBRE BIRHAN, ETHIOPIA

Investigators taking bribes were additionally identified as a risk in **Cox's Bazar** and **Ethiopia**.

The key message was summarised in **Cox's Bazar**: independent, appropriately skilled investigators with the involvement of local processes is best.

Involving Local Structures, Spaces and Individuals

In **OPT**, some expressed a preference for police to investigate, as they are mandated to do so, and can hold perpetrators to account – although significant challenges were noted in the approach to GBV, the preference was to capacitate the police rather than replace them. Aid organisations' investigations can be seen as colonial, whereas involvement of the police means local ownership of process.

In **Cox's Bazar**, it was suggested that buy-in to an organisation's internal investigation would be through female community representative, such as the Majhi or the Majhi's wife or sister. Some recommended that interviews and discussions related to investigations should take place in a safe shelter or Majhi's house as it is more private.

In **Ethiopia**, it was recommended that investigations take place in the Office of Women, Children's and Social Affairs. These spaces appeared to be considered more confidential than the aid organisations' offices.

Communities in **Cox's Bazar** also suggested that the focal point/accompaniment for investigation could be the civil society intermediary such as female Majhi, Majhi's wife or camp-based female Rohingya PSEAH Focal Point, to provide updates and feedback on the investigation process to safeguard survivors' boundaries, rights, and interests.

RECOMMENDATIONS

- ✓ Organisations consider whether an investigation is necessary, or whether there are other ways in which the SEAH case can be resolved, which do not risk re-traumatising the survivor, while ensuring that the organisation's staff and associated personnel do not present a risk to others they interact with.
- ✓ If an investigation is required, the victim/survivor provides consent based on an informed choice where the implications and potential conclusions of an investigation are made clear to them. If the victim/survivor does not consent, other options for resolving the case are considered (see above).
- ✓ When organisations decide an investigation needs to take place, they consider whether victims/survivors need to participate, or whether the investigation can be conducted using other approaches.
- ✓ When conducting investigations, organisations follow principles including transparency and impartiality, use investigators trained and experienced in survivor-centred and trauma-informed approaches, and use safe and appropriate investigation protocols. 'Balance of probability' is used as the evidentiary threshold.
- ✓ Victim/survivors are accompanied by a trusted intermediary or other support person throughout their interaction with the organisation, if they wish to be. This support person should be unconnected with the organisation and chosen by the victim/survivor.
- ✓ Organisations should consider collaborating with external stakeholders and safe spaces that are trusted by communities in the investigation process, for example local community structures and institutions.

VCA IN PRACTICE

In **Ethiopia**, stakeholders were asked what the characteristics of a good investigator should be. The response was as follows:

1. **Understanding local context and cultural norms:** Awareness of cultural sensitivities and power dynamics within the targeted community is crucial for conducting culturally competent investigations.
2. **Proficiency in English language:** Both written and spoken fluency are necessary for effective communication with diverse stakeholders.
3. **Computer proficiency,** able to navigate online platforms, utilise learning management systems, and actively participate in online training modules and discussions.
4. **Experience** working in gender-based violence (GBV) or related fields: Prior experience working with survivors of GBV and/or related issues, such as human trafficking or child protection, with skills and sensitivity for dealing with SEAH cases.
5. **Interpersonal and communication skills:** This includes active listening, empathy, building trust, and conducting interviews in a trauma-informed and culturally sensitive manner.
6. **Critical thinking and analytical abilities:** Ability to analyse evidence, identify patterns, draw objective conclusions, and write clear and concise reports.
7. **Commitment to ethical conduct and safeguarding principles:** Upholding confidentiality, respecting boundaries, and prioritising the safety and well-being of all individuals involved.
8. **Emotional resilience and self-care awareness:** Ability to manage stress and vicarious trauma while maintaining professionalism and emotional well-being throughout the investigative process.

The project facilitated training for national NGOs on investigation and case management. The training was conducted by Ethiopian staff from INGOs who were experienced in GBV and case management, so that the training was contextually appropriate.

AWA

AWA (Amhara Women's Association) is based in Bahir Dar, Ethiopia. Their mission is to promote a society that respects the rights of women and girls. AWA assist women's motivation to participate and strives towards equality in every aspect of life, ensuring they equally benefit from the fruits of their labour. Currently, the Amhara Women Association has more than 1.86 million active members participating in the development agenda for women and girls.

In **Cox's Bazar**, community representatives have been briefed on organisational SEAH investigations to assist investigators in navigating the cultural nuances of the community sensitively. Women representatives are offering their homes for victims/survivors and witness interviews to mitigate local suspicions and potential rumours.

Indicators Investigations:

- Number of community intermediaries, aid workers, government and other agency officials trained in survivor centred SEAH investigations
- Number of aid organisations, government and other agencies refreshing organisational policies and procedures to ensure VCA approach to SEAH investigation
- Percentage increase in reported cases of SEAH progressing to investigation (or legal authorities)
- Percentage increase in victims/survivors who consider the investigation was conducted in a prompt, confidential and victim-centred way
- Percentage of investigated allegations/cases that were substantiated



6.

ORGANISATIONAL DECISION MAKING

ORGANISATIONAL DECISION MAKING

WHAT'S HAPPENING WITH THE VICTIM/SURVIVOR

The victim/survivor is notified that the investigation is complete. Details of what is shared vary depending on organisational policy.

WHAT'S HAPPENING IN THE ORGANISATION

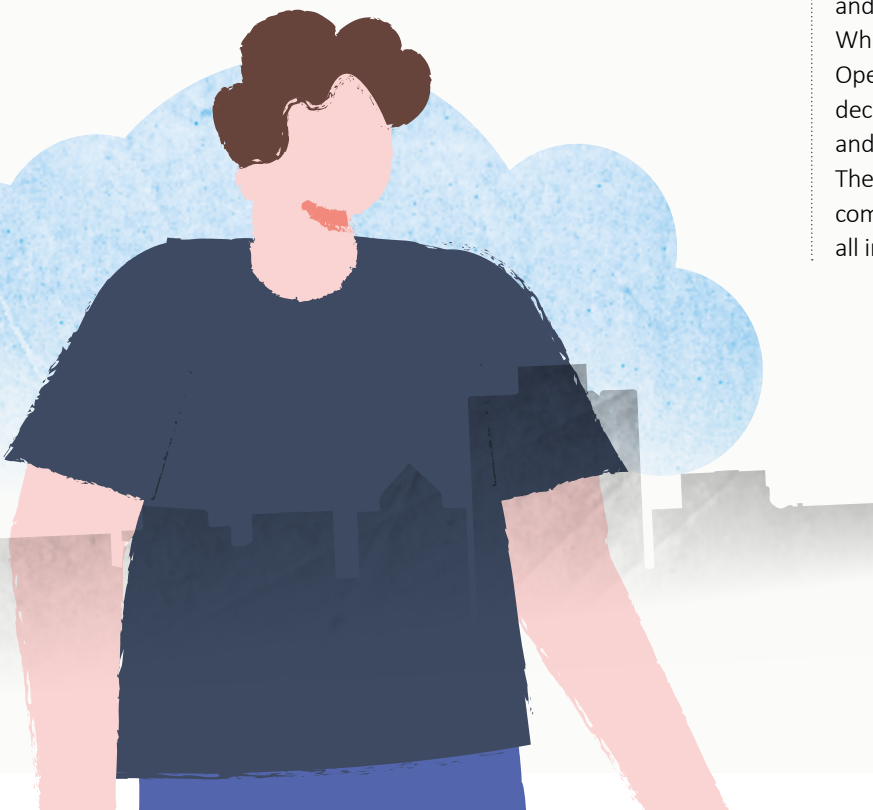
The organisation makes decisions on next steps to take, for example

- If disciplinary procedures are required
- If any other stakeholders need to be informed of the case
- If any learning can be fed back into the organisation

A SEAH case usually requires key decisions to be made by the aid organisation. This will encompass:

- Deciding on the immediate safety measures based on the level of risk posed to the survivor
- Deciding whether to initiate a formal investigation
- Deciding whether to involve law enforcement based on severity and circumstances
- Deciding on disciplinary measures or corrective actions for staff involved
- The action to be taken if an investigation yields inconclusive results
- The policy and procedural changes to be made to the organisation are based on learnings from the case.

The results of procedures such as investigations and risk assessments should guide these decisions. While aid organizations' policies and Standard Operating Procedures provide the framework, decisions regarding SEAH cases are often intricate and multifaceted, impacting various stakeholders. These decisions require both sound judgment and a compassionate approach, ensuring the well-being of all involved and upholding integrity in mitigating harm.



LEARNING FROM VICTIMS/ SURVIVORS AND COMMUNITIES

Communities have limited influence on organisational decision-making and have expressed dissatisfaction with the lack of feedback from organisations, particularly regarding updates and the outcomes of reported SEAH cases.

In **Cox's Bazar**, communities commented that the decisions of organisations tend to be limited to solely terminating the contract of the perpetrator, while the victim/survivors receive, in most cases, psychosocial support but are left to navigate through

the socioeconomic and cultural aftermath of SEAH alone. They mentioned that many victim/survivors tend not to report SEAH owing to the risk it brings and the inadequate outcome that fails to take their best interests into consideration. The victim/survivor and community do not take part in decision-making.

Communities in **Cox's Bazar** suggested that a trusted intermediary from the Rohingya community, the Majhi or his wife, or a camp-based Rohingya female Focal Point or Shantikhana personnel should represent the victim/survivor and her community to negotiate with the organisation to ensure a decision that secures the best interest of the victim/survivor.

RECOMMENDATIONS

- ✓ Decisions are made in the best interest of the victim/survivor, rather than the organisation.
- ✓ Disciplinary outcomes for perpetrators are consistent, and anonymised data on cases are shared in the public domain so that organisations can be held to account.
- ✓ Whistleblowers are not retaliated against for exposing SEAH cases or reporting malpractice or negligence in dealing with SEAH cases by organisations. All organisations should have at minimum a [Whistleblower protection policy](#) (Disclosure of Malpractice in the Workplace policy) in place which is also upheld in practice. Immediate disciplinary action should be taken against anyone who victimises or retaliates against a person who has reported SEAH.

VCA IN PRACTICE

In **Cox's Bazar**, the trusted intermediaries helped victims/survivors to navigate their interactions with aid organisations, and other stakeholders in SEAH cases.

Both cultural and legal constraints can prevent victim/survivors and communities in Cox's Bazar from accessing decision-making spaces. For example, Rohingya camp residents do not usually have permission to travel outside the camp. Additionally, women and girls are limited in who they can interact with outside of the family group. The trusted intermediaries can use their position in the community to 'knock on doors', both within the camp and even at aid organisation's headquarters offices in Dhaka. In this way, the trusted intermediaries can support victim/survivors to hold organisations to account in SEAH cases.

To ensure organisations address the needs of SEAH survivors, female representatives and the Camp in Charge (CiC) are actively involved, as recommended by the community. Their role ensures that, beyond terminating perpetrators, the well-being of survivors is prioritised. Community representatives liaise with the CiC in camps and organisations to ensure organisational decisions positively impact survivors' lives.

Measuring and Monitoring Organisational Decision-Making

- Outcomes of investigations are documented and shared with victim/survivor
- Percentage of substantiated cases that led to disciplinary action
- Percentage of victims/survivors satisfied with communication and progress updates throughout investigation process
- Perpetrator is registered in the perpetrator registry



7.

REDRESS & COMPENSATION



REDRESS & COMPENSATION

WHAT'S HAPPENING WITH THE VICTIM/SURVIVOR

The victim/survivor may receive compensation from the organisation. They may also be supported to seek redress.

If not, the victim/survivor may choose to seek redress for themselves, for example through a legal process or a customary practice.

WHAT'S HAPPENING IN THE ORGANISATION

The organisation decides on whether redress and/or compensation are provided to the victim/survivor, and if so, what form these will take.

One of the most overlooked and under-resourced areas of work concerning PSEAH within the aid sector is redress and compensation. Yet, this area holds immense significance for victims and survivors of SEAH. Victims and survivors rightfully seek justice in the aftermath of SEAH incidents, accountability from organisations involved, and compensation for the harm they have endured.

Redress encompasses various forms, including financial compensation, support to access legal remedies, and engagement in communal justice mechanisms. The form of redress required varies depending on the survivor, the community and the context of the incident. It aims not only to provide tangible restitution for the harm suffered but also to acknowledge and address the broader impacts on the victim's well-being and recovery.

Efforts to address redress and compensation in PSEAH cases are crucial for ensuring that victims' rights are respected and that organisations take responsibility for their actions. By prioritising and adequately resourcing this aspect of PSEAH, aid organisations can contribute to a more equitable and supportive environment for victims and survivors seeking justice and healing.

LEARNING FROM VICTIMS/SURVIVORS AND COMMUNITIES

Community Involvement and Knowing Their Rights

In **Cox's Bazar**, it was observed that the victim/survivor and community are not involved in the decision-making on redress, so compensation is inadequate.

Some in **OPT** expressed an interest in learning more about the law, legal rights and tribal law related to SEAH. They recommended a comprehensive reference resource that clearly explains the rights of victims and survivors of SEAH within the legal framework.

No Access to The Law

Some communities in the pilot faced complex civil contexts where they do not have access to redress through the courts. In **OPT**, this includes Area C in the West Bank where the Palestinian Authority has no jurisdiction. In **Cox's Bazar**, the Rohingya population have no access to legal protection as they are not citizens of Bangladesh.

RECOMMENDATIONS

- ✓ Organisations are aware of and committed to their administrative and legal obligation to ensure redress for victims/survivors of SEAH.
- ✓ Where possible, organisations support the victim/survivor's wishes for redress – for example legal recourse, or common law or restorative justice practices.
- ✓ Where the SEAH is a criminal act, legal aid is facilitated for victim/survivors if they wish to pursue legal recourse.
- ✓ Organisations adjust their existing compensation policies for harms other than SEAH to inform practice on compensation cases of SEAH. Specifically, organisations consider financial compensation as is usual in other workplace malpractice cases.

VCA IN PRACTICE

In **OPT**, the PSCCW project focused on how to make assistance more victim/survivor-focused, for them to feel comfortable coming forward and seek legal redress. The project found that there was an accountability gap, in that victims/survivors did not immediately want to come forward and hold perpetrators accountable – but might want to do so at a later stage.

The mental health professionals working with the victim/survivors took a holistic approach in accompanying victim/survivors through support at their own pace. With this accompaniment, some victim/survivors decided at a later point that they wanted to take up the offer of available legal consultation, to pursue legal redress against the perpetrator.

Measuring and Monitoring Redress and Compensation

- Number of aid organisations refreshing organisational policies and procedures to ensure VCA approach to compensation and redress for SEAH
- Number of victims/survivors receiving legal aid/support
- Percentage of cases investigated where victim/survivor receives compensation or other redress
- Percentage increase in victim/survivor satisfaction following the outcome of an investigation

The Cost of Inaction

Organisations must handle misconduct cases carefully to avoid causing more harm than if they had done nothing. Ensuring that SEAH is competently addressed in line with implementation companion ensures a high-quality process for the survivor, can mitigate reputational risks, and impacting donor funding and avoid legal claims by perpetrators. Organisations must consider their accountability first and set aside their conflicts of interest. PSEAH is an accountability issue where transparency and responsibility towards both the people we serve and the donors who fund us are paramount.

TABLE OF RECOMMENDATIONS

Recommendations for a survivor-centred approach

A selection of further resources

Victimisation

Organisations should collect and analyse data on how and where SEAH perpetration commonly occurs in their setting.

Methodologies should include conducting and utilising existing research and consulting with crisis-affected people and groups at risk of SEAH, organisations and individuals who work on related issues in the context.

Trusted civil society intermediaries should act as a liaison between victims/survivors and the organisation throughout the PSEAH process, if required

[Ethiopia PSEA Network Risk Assessment Guide](#)
[SEAH Risk assessment and Management in Emergencies Safeguarding Resource and Support Hub Understanding SEAH in South Sudan](#)

Communications and awareness-raising activities in SEAH are based on communities' own knowledge and understanding of exploitation and abuse of power and use language and examples from their lived experience.

Awareness-raising materials and activities should not only comprise written materials but consider what communications model will resonate with the audience in that context. This might be other means of storytelling such as visual arts, role play and drama, and means of delivery such as radio, personal interaction, or social media

[Clear Global Resources on Language and PSEAH](#)
[InterAction Safeguarding Visual Toolkit](#)
[Safeguarding Resource and Support Hub Contextual Communications for Safeguarding](#)

Disclosure and Reporting

Organisations recognise that the burden of reporting SEAH should not be placed on survivors and communities. They are more proactive in analysing SEAH risk and proactively identifying where perpetration is occurring.

Organisations are aware that disclosures may be made through any means, not just designated staff and reporting channels. Some of these means may be external to the organisation.

Organisations recognise the role that trusted intermediaries play in reporting SEAH, both within and external to the organisation, and work with them on receiving and handling disclosures, making referrals and facilitating access to support services.

Organisations have community based PSEAH Focal Points in place that replicate this 'trusted intermediary', who have received training where necessary, that is appropriate and meaningful to them. These might not always be staff members but may be members of the community where this has been identified as preferable by the community.

Staff who are likely to come into contact with members of the community have at a minimum basic training on how to receive a disclosure. This should include how to respond in a way that prevents further traumatisation, and how to appropriately refer the disclosure within the organisation.

Any reporting channels in place are designed in consultation with different groups in communities and are safe, accessible, appropriate and confidential. Multiple channels should be provided, that are tailored for different groups in the community. However, the organisation should not rely solely on these channels to bring SEAH to their attention.

[How to Support Survivors of GBV When a GBV Actor is Not Available in Your Area Guidelines](#)
[Safeguarding Resource and Support Hub How to Design a CBRM](#)
[Safeguarding Resource and Support Hub Preparing for and Managing Safeguarding Reports](#)

Recommendations for a survivor-centred approach**A selection of further resources****Case management**

Victim/survivors are treated as unique individuals who are experts in their situation. This may include supporting victim/survivors to access external institutions, structures, and processes, including traditional leadership.

Organisations' internal reports handling and case management systems are designed with vulnerable and at-risk groups in mind, such as children, people of different SOGIE (sexual orientation or gender identity expression), people living with disabilities, and male survivors.

The victim/survivor's consent is sought before proceeding with a SEAH report. When victim/survivor does not consent, the organisation balances its decision-making with the risk that the perpetrator may be posing to people they come into contact with, and considers alternative actions where possible.

Organisations are honest with the victim/survivor about what will happen if they wish to proceed with a report of SEAH. The case management and investigation processes are outlined, including how decisions are made on the conclusions— and the limitations on what may be possible in terms of disciplinary procedure of the perpetrator. The victim/survivor is able to make an informed decision on what they consent to in the process.

Victim/survivors are provided with support for as long as it is needed, at the pace of the victim/survivor.

[GBV IMS Interagency Gender-based Violence Case Management Guidelines](#)
[Safeguarding Resource and Support Hub Case Management Flow Chart](#)
[CHS Alliance Managing Complaints Package](#)

Referral to Support Services

Comprehensive support service mapping is undertaken before an SEAH case is reported. Services are identified that are safe for victims/survivors, particularly those who may be at increased risk. Services that are mapped take local context and custom into account. Support service mappings are shared between organisations and should be regularly updated.

Victims/survivors are proactively assisted to access services, should they wish to. This should take place at the victim/survivor's pace, even if this does not fit with organisational case management and investigation timeframes.

Cases involving children under 18 are always referred to appropriate services when it is safe to do so.

[Safeguarding Resource and Support Hub Mapping Local Services](#)
[The UNICEF Technical Note to support the UN Protocol on Provision of Assistance to Victims of SEA](#)

Investigation

Organisations consider whether an investigation is necessary, or whether there are other ways in which the SEAH case can be resolved, which do not risk re-traumatising the survivor, while ensuring that the organisation's staff and associated personnel do not present a risk to others they interact with.

If an investigation is required, the victim/survivor provides consent based on an informed choice where the implications and potential conclusions of an investigation are made clear to them. If the victim/survivor does not consent, other options for resolving the case are considered (see above).

When organisations decide an investigation needs to take place, they consider whether victims/survivors need to participate, or whether the investigation can be conducted using other approaches.

When conducting investigations, organisations follow principles including transparency and impartiality, use investigators trained and experienced in survivor-centred and trauma-informed approaches, and use safe and appropriate investigation protocols. 'Balance of probability' is used as the evidentiary threshold.

Victim/survivors are accompanied by a support person throughout their interaction with the organisation, if they wish to be. This support person should be unconnected with the organisation and chosen by the victim/survivor.

Organisations should consider collaborating with external stakeholders and safe spaces that are trusted by communities in the investigation process, for example local community structures and institutions.

[CHS SEAH Investigation Guide](#)
[Safeguarding Resource and Support Hub How to Survivor-Centred Investigations](#)

Recommendations for a survivor-centred approach**A selection of further resources****Organisational Decision-Making**

Decisions are made in the best interest of the victim/survivor, rather than the organisation. Disciplinary outcomes for perpetrators are consistent, and anonymised data on cases are shared in the public domain so that organisations can be held to account.

Whistleblowers are not retaliated against for exposing SEAH cases or reporting malpractice or negligence in dealing with SEAH cases by organisations. All organisations should have at minimum a Whistleblower protection policy (Disclosure of Malpractice in the Workplace policy) in place which is also upheld in practice. Immediate disciplinary action should be taken against anyone who victimises or retaliates against a person who has reported SEAH.

[CHS Alliance Harmonised Data Collection and Reporting Scheme](#)

[CHS Alliance Whistleblower Protection Guidance](#)

Redress and Compensation

Organisations are aware of and committed to their administrative and legal obligation to ensure redress for victims/survivors of SEAH.

Where possible, organisations support the victim/survivor's wishes for redress – for example legal recourse, or common law or restorative justice practices.

Where the SEAH is a criminal act, legal aid is facilitated for victim/survivors if they wish to pursue legal recourse.

Organisations adjust their existing compensation policies for harms other than SEAH to inform practice on compensation cases of SEAH. Specifically, organisations consider financial compensation as is usual in other workplace malpractice cases.

[UN Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse](#)

Upcoming guidance from CAPSEAH



Ministry of Foreign Affairs of the
Netherlands



**DELIVERING A VICTIM/
SURVIVOR-CENTRED
APPROACH TO PROTECTION
FROM SEXUAL EXPLOITATION,
ABUSE AND HARASSMENT
IN THE AID SECTOR**

WHAT WILL IT TAKE?

**IMPLEMENTATION
COMPANION**

CHS Alliance
NGO Humanitarian Hub,
La Voie-Creuse 16, 1202 Geneva,
Switzerland
info@chsalliance.org
www.chsalliance.org
+41 (0)22 788 16 41